

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc.)	Docket No. ER22-727-000
New England Power Pool Participants)	
Committee)	

**COMMENTS OF THE
NEW ENGLAND STATES COMMITTEE ON ELECTRICITY**

Pursuant to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) December 27, 2021 Combined Notice of Filings #1 and December 30, 2021 Errata Notice, the New England States Committee on Electricity (“NESCOE”) hereby submits these comments in the above-captioned proceeding.¹ On December 27, 2021, ISO-NE and the New England Power Pool (“NEPOOL”) Participants Committee jointly filed with the Commission proposed Tariff revisions “to incorporate a supplementary, transmission planning mechanism for the ISO to perform state-requested, scenario-based transmission analysis as a permanent feature” of the regional transmission planning process (“Longer-Term Planning Changes”).²

NESCOE strongly supports the Longer-Term Planning Changes. As discussed in the December 2021 Filing, these revisions effectuate one of the key visions that the New England states set out to realign our regional electric system to meet current and emerging needs.³

¹ On January 3, 2022, NESCOE filed a doc-less motion to intervene in this proceeding. NESCOE is the Regional State Committee for New England, representing the collection positions of the six New England states in regional electricity matters. Capitalized terms not defined in this filing are intended to have the meaning given to such terms in the ISO New England Inc. (“ISO” or “ISO-NE”) Transmission, Markets and Services Tariff (“Tariff”).

² ISO New England Inc. and New England Power Pool Participants Committee, Attachment K Longer-Term Planning Changes, Docket No. ER22-727-000 (filed Dec. 27, 2021) (“December 2021 Filing”), at 1.

³ See *id.* at 2-3 (quoting NESCOE, *New England States’ Vision for a Clean, Affordable, and Reliable 21st Century Regional Electric Grid*, Oct. 16, 2020 (“Vision Statement”), available at <https://nescoe.com/wp->

NESCOE’s Vision Statement expressed that our region “cannot effectively plan for integrating clean energy resources and decarbonization of the electricity system required by certain states’ laws without having a clear understanding of the investments needed in regional transmission infrastructure.”⁴ The Vision Statement further noted that the “need for such planning has become paramount” and that the Tariff currently lacks a routine planning process to identify potential cost-effective transmission investments to integrate resources across the region to meet states’ clean energy requirements.⁵ NESCOE’s subsequent report to the New England Governors in July 2021, *Advancing the Vision*, recommended continued work with ISO-NE and stakeholders to “implement a state-led, proactive scenario-based planning process for long-term analysis of state mandates and policies as a routine planning practice.”⁶

The Longer-Term Planning Changes create this process. In so doing, the Tariff revisions implement a flexible, state-led transmission planning tool—consistent with Commission precedent⁷—to provide critical visibility into future public policy-driven transmission needs and facilitate consideration of transmission options that seek to integrate “clean energy resources at the lowest possible cost.”⁸

[content/uploads/2020/10/NESCOE_Vision_Statement_Oct2020.pdf](#)); *see also* December 2021 Filing, Prepared Testimony of Brent K. Oberlin on Behalf of ISO New England Inc., Attachment 3, at 2-3.

Following issuance of the Vision Statement, state officials organized a series of public technical sessions in 2020 and 2021. Materials and archived recordings are available at <https://newenglandenergyvision.com/>.

⁴ Vision Statement at 3-4.

⁵ *Id.* at 4.

⁶ *New England Energy Vision Statement: Report to the Governors – Advancing the Vision* (June 2021), at 12, available at https://nescoe.com/wp-content/uploads/2021/06/Advancing_Vision_Report_6-29-21.pdf.

⁷ *See, e.g.*, December 2021 Filing at 5-6 (citing to Commission orders on Order No. 1000 compliance filings from ISO-NE and PJM Interconnection, L.L.C. regarding complementary and optional processes to regional transmission planning for public policy-based needs).

⁸ Vision Statement at 5.

NESCOE greatly appreciates ISO-NE's efforts in translating the Vision Statement's transmission planning framework into Tariff revisions. This work culminated in broad regional consensus for this enhancement to the planning process, with market participants and stakeholders unanimously supporting the Longer-Term Planning Changes at the NEPOOL Participants Committee.⁹

For the reasons stated herein, NESCOE respectfully requests that the Commission accept the Longer-Term Planning Changes.

Respectfully Submitted,

/s/ Jason Marshall

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Date: January 18, 2022

⁹ See December 2021 Filing at 9.

CERTIFICATE OF SERVICE

In accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day served by electronic mail a copy of the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Cambridge, Massachusetts this 18th day of January, 2022.

/s/ Jason Marshall

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