

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

RENEW Northeast, Inc.,	)	
Complainant,	)	
	)	
v.	)	Docket No. EL23-16-000
	)	
ISO New England Inc. and	)	
New England Participating Transmission	)	
Owners,	)	
Respondents	)	

**ANSWER OF THE  
NEW ENGLAND STATES COMMITTEE ON ELECTRICITY  
IN SUPPORT OF THE MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 213<sup>1</sup> of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, the New England States Committee on Electricity (“NESCOE”)<sup>2</sup> submits this answer to the Motion for Extension of Time and Request for Expedited Action by the Participating Transmission Owners Administrative Committee (“PTO AC”) filed on December 16, 2022.<sup>3</sup> For the reasons stated herein, NESCOE agrees that an extension of time to answer the Complaint filed by RENEW Northeast, Inc. (“RENEW”)<sup>4</sup> in this proceeding would be reasonable and supports the PTO AC’s request. Likewise, NESCOE supports the PTO AC’s request that the Commission expedite its consideration of this motion by acting no later than December 23, 2022.<sup>5</sup>

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<sup>1</sup> 18 C.F.R. § 385.213 (2021).  
<sup>2</sup> NESCOE filed a doc-less motion to intervene in this proceeding on December 14, 2022.  
<sup>3</sup> See Motion for Extension of Time and Request for Expedited Action by the Participating Transmission Owners Administrative Committee, Docket No. EL23-16-000 (filed December 16, 2022) (“Extension Request”).  
<sup>4</sup> *RENEW Northeast, Inc. v. ISO New England, Inc. et al.*, Complaint, Docket No. EL23-16 (filed Dec. 13, 2022).  
<sup>5</sup> Extension Request at 2, 5.

In the Extension Request, the PTO AC seeks a brief extension of the deadline for responses to the Complaint from January 3, 2023 to January 23, 2023.<sup>6</sup> The PTO AC states that RENEW does not oppose the request for a 20-day extension.<sup>7</sup> The PTO AC explains that coordination among the 31 separate entities named in the complaint will be a significant undertaking.<sup>8</sup> The PTO AC also notes, among other things, that the Complaint relates to a complicated area of the ISO-New England Inc. tariff with numerous likely interested parties representing various stakeholder groups.<sup>9</sup>

Issues concerning transmission cost allocation are of critical importance to New England. NESCOE agrees that additional time to respond to the Complaint is needed and, ultimately, an extension would provide the Commission with a more thorough record. A 20-day extension of time will not prejudice RENEW—which does not oppose the request according to the Extension Request<sup>10</sup>—or otherwise unduly delay the resolution of any issues raised in the Complaint. NESCOE supports the request for the extension of time to answer the Complaint.

For the reasons discussed herein, NESCOE respectfully requests that the Commission grant the PTO AC’s requested extension of time to answer the Complaint and expedite its consideration of this motion by acting no later than December 23, 2022.

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<sup>6</sup> *Id.* at 4.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 3.

<sup>9</sup> *Id.* (referencing Schedules 11 and 21 of Part II of the ISO-NE Transmission, Market, and Services Tariff).

<sup>10</sup> *Id.*

Respectfully Submitted,  
*/s/ Shannon Beale* \_\_\_\_\_  
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Dated: December 21, 2022

## 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 Natick, Massachusetts this 21<sup>st</sup> day of December, 2022.

/s/ Shannon Beale  
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