

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

ISO New England Inc.)	Docket Nos. ER23-739-000
PTO Administrative Committee)	ER23-743-000
New England Power Pool Participants Committee)	

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

Pursuant the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) December 29, 2022 Combined Notice of Filings #1, the New England States Committee on Electricity (“NESCOE”) hereby submits these comments in the above-captioned proceeding.¹ On December 29, 2022, ISO-NE, joined by the PTO Administrative Committee (“PTO AC”) on behalf of the New England Participating Transmission Owners (“PTOs”) and the New England Power Pool Participants Committee jointly filed with the Commission proposed revisions to the Tariff and the Transmission Operating Agreement (“TOA”) between the PTOs and ISO-NE to incorporate rules that will enable electric storage facilities to be planned and operated as transmission-only assets (“Storage as Transmission-Only Asset” or “SATOA”) to address system needs identified in the regional system planning process set forth in the OATT (“SATOA Revisions”).²

¹ On January 3, 2023, NESCOE filed a doc-less motion to intervene in this proceeding. NESCOE is the Regional State Committee for New England, representing the collective 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”). Section II of the Tariff contains the Open Access Transmission Tariff (“OATT”).

² ISO New England Inc., Revisions to Enable the Treatment of Storage as Transmission-Only Assets, Docket No. ER23-739-000 (filed December 29, 2022) (“SATOA Filing Part 1”), at 1-2. ISO-NE filed the SATOA Revisions with the Commission in two parts, and two separate docket numbers were assigned for each submission (ER23-739-00 and ER23-743-000).

Presently, ISO-NE’s regional system planning process, which ISO-NE performs in accordance with the TOA and Attachment K of the OATT, does not allow for consideration of electric storage facilities as traditional regulated transmission solutions when addressing identified transmission system needs.³ This is predominantly because electric storage facilities have historically been treated as market resources.⁴ However, the Commission has recognized that there may be situations and system needs that are more efficiently and cost-effectively addressed by electric storage facilities serving as transmission assets.⁵

Following the region’s first competitive transmission solicitation process, ISO-NE committed to exploring changes to that process informed by its experience and initiated stakeholder discussions to inform “lessons learned” from the solicitation.⁶ As part of these stakeholder discussions, NESCOE advocated for ISO-NE to work to modify its Tariff to allow for the inclusion of electric storage facilities as transmission-only asset both in competitive solicitations and incumbent solutions studies.⁷ In response to requests from NESCOE and stakeholders, ISO-NE developed the SATOA Revisions proposed in this filing.⁸ ISO-NE’s efforts resulted in broad regional support for the proposed SATOA Revisions.⁹

³ SATOA Filing Part 1 at 5.

⁴ *Id.*, citing TOA at Section 3.09(a) (“The ISO shall perform all of its responsibilities pursuant to the ISO Planning Process set forth in the ISO OATT.”).

⁵ *Id.*; *see also id.* at n.17.

⁶ *See, e.g.*, Competitive Solution Process: Order 1000/Boston 2028 Request for Proposal Lessons Learned (February 17, 2021), at https://www.iso-ne.com/static-assets/documents/2021/02/a11_greater_boston_2028_rfp_and_order_1000_lessons_learned.pdf. *See also ISO New England Inc. and New England Power Pool Participants Committee*, 169 FERC ¶ 61,195 at P 21 (2019).

⁷ *See* ISO-NE, Order 1000/Boston 2028 RFP Lessons Learned Submittal Template – NESCOE, at 5, https://www.iso-ne.com/static-assets/documents/2020/12/a3_competitive_solution_process_order_1000_boston_2020_request_for_proposal_1_essons_learned_stakeholder_comments.pdf; SATOA Filing Part 1 at 6.

⁸ SATOA Filing Part 1 at 6.

⁹ *Id.* at 6, 24-25.

NESCOE strongly supports the SATOA Revisions and greatly appreciates ISO-NE's close work with states and stakeholders throughout the process of developing Tariff revisions. The eligibility of electric storage facilities as transmission-only assets should enhance the competitiveness of future solicitation processes, ultimately resulting in more cost-effective transmission solutions and benefits to consumers.¹⁰ The expanded eligibility reflected in the proposed Tariff changes represents an important and incremental step toward considering how to more fully leverage SATOAs to provide enhanced system benefits and better cost-effective solutions to solve regional needs.

As ISO-NE gains experience with SATOAs and as storage technologies such as batteries are deployed in increasing numbers throughout New England in the coming years, ISO-NE should reevaluate both the criteria in the SATOA Revisions for dispatching these resources as well as undertake a broader consideration of potential other SATOA solutions. NESCOE looks forward to continuing to work with ISO-NE, the PTO AC, and stakeholders on these issues.

For the reasons stated herein, NESCOE respectfully requests that the Commission approve the proposed SATOA Revisions.

Respectfully Submitted,

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¹⁰ *Id.*

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 19th day of January, 2023.

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