

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

Implementation of Dynamic
Line Ratings

)
)

Docket No. RM24-6-000

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

Pursuant to the Advance Notice of Proposed Rulemaking issued by the Federal Energy Regulatory Commission (“Commission” or “FERC”) on June 27, 2024,¹ the New England States Committee on Electricity (“NESCOE”) files comments on the Commission’s consideration of the need to establish requirements for transmission providers to use dynamic line ratings (“DLRs”) to improve the accuracy of transmission line ratings as well as potential reforms to ensure transparency in the development and implementation of DLRs.²

I. DESCRIPTION OF COMMENTER

NESCOE is the Regional State Committee (“RSC”) for New England. It is governed by a board of managers appointed by the Governors of Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont and is funded through a regional tariff that ISO New England Inc. (“ISO-NE”) administers.³ NESCOE’s mission is to represent the interests of the citizens of the New England region by advancing policies that will provide electricity at the lowest possible price over the long term, consistent with maintaining reliable service and

¹ *Implementation of Dynamic Line Ratings*, Advance Notice of Proposed Rulemaking, 187 FERC ¶ 61,201 (2024) (“ANOPR”).

² ANOPR at P 1.

³ *ISO New England Inc.*, 121 FERC ¶ 61,105 (2007).

environmental quality.⁴ These comments represent the collective view of the six New England States.

II. COMMENTS

NESCOE appreciates the Commission's efforts to improve the accuracy of transmission line ratings and ensure that DLRs are developed and implemented in a transparent manner.

NESCOE strongly supports the Commission's ANOPR.⁵

Alternative transmission technologies, such as DLRs, can provide substantial benefits to the electric grid when incorporated with existing and new transmission infrastructure.⁶ As the Commission has acknowledged, when added to existing infrastructure, alternative transmission technologies have the potential to “optimize the performance of such infrastructure, mitigating or deferring the need for development of new regional transmission facilities.”⁷ Certain alternative transmission technologies, including DLRs, can also enhance reliability benefits.⁸ NESCOE has long supported the efficient use of existing transmission facilities and the construction of new facilities, where necessary and appropriate, to ensure the transmission grid's reliability, efficiency, and ability to integrate clean energy resources, consistent with certain States' legal

⁴ See Sept. 8, 2006 NESCOE Term Sheet (“Term Sheet”) that was filed for information as Exhibit A to the Memorandum of Understanding among ISO-NE, the New England Power Pool (“NEPOOL”), and NESCOE (the “NESCOE MOU”). Informational Filing of the New England States Committee on Electricity, Docket No. ER07-1324-000 (filed Nov. 21, 2007). Pursuant to the NESCOE MOU, the Term Sheet is the binding obligation of ISO-NE, NEPOOL, and NESCOE.

⁵ ANOPR at P 1.

⁶ Request for Clarification and Rehearing of the New England States Committee on Electricity, Docket No. RM21-17-000, at 23 (filed June 12, 2024) (“NESCOE Request for Clarification and Rehearing”).

⁷ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Final Rule, Order 1920, 187 FERC ¶ 61,068 (2024) (“Order No. 1920”), at P 1201. Order No. 1920 adopted and modified the NOPR by requiring the consideration of advanced conductors and transmission switching in addition to dynamic line ratings and advanced power control devices. Order No. 1920 at P 1198.

⁸ *Id.* at P 1241.

requirements and other mandates.⁹ Similarly, NESCOE supports requiring transmission providers to prioritize consideration of alternative transmission technologies when evaluating potential transmission solutions.¹⁰

The ANOPR builds on Order No. 2023¹¹ and Order No. 1920's mandates that transmission providers evaluate alternative transmission technologies in interconnection studies¹² and transmission planning.¹³ NESCOE commends the Commission for considering how to implement DLRs in a transparent manner, and, thereby, improve the accuracy of transmission line ratings. NESCOE is confident that efforts to adopt accurate transmission line ratings will lead to just and reasonable wholesale rates and, ultimately, consumer rates. Accordingly, NESCOE strongly encourages the Commission to advance the ANOPR to a proposed rule informed by the comments received on the ANOPR in order to encourage the continued deployment of DLRs.

III. CONCLUSION

NESCOE thanks the Commission for its consideration of these Comments.

⁹ See, e.g., NESCOE, *New England States' Vision for a Clean, Affordable, and Reliable 21st Century Regional Electric Grid* (Oct. 2020), at 3, at <https://nescoe.com/resource-center/vision-stmt-oct2020/>.

¹⁰ See NESCOE Request for Clarification and Rehearing, at 22-25.

¹¹ *Improvements to Generator Interconnection Procs and Agreements*, Order No. 2023, 184 FERC ¶ 61,054 (2023) ("Order No. 2023"); *order on motions*, 185 FERC ¶ 61,063 (2023); *order on reh'g & clarification*, Order No. 2023-A, 186 FERC ¶ 61,199 (2024).

¹² Order No. 2023 at P 1578.

¹³ Order No. 1920 at P 1198.

Respectfully Submitted,

/s/ Shannon Beale

Shannon Beale

Assistant General Counsel

New England States Committee on Electricity

P.O. Box 322

Osterville, MA 02655

Tel: (781) 400-9000

Email: shannonbeale@nescoc.com

Dated: October 15, 2024