UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Technical Conference on Resource Adequacy	)	Docket No. AD25-7-000
	)	

POST-TECHNICAL CONFERENCE COMMENTS OF THE NEW ENGLAND STATES COMMITTEE ON ELECTRICITY

Pursuant to the Federal Energy Regulatory Commission's (the "Commission" or "FERC") Notice Requesting Post-Conference Comments, the New England States Committee on Electricity ("NESCOE")[1] hereby submits these comments in the above-captioned proceeding.

On June 4, 2025, and June 5, 2025, respectively, the Commission held a two-day commissioner-led conference on resource adequacy referred to as the "2025 Technical Conference on Meeting the Challenge of Resource Adequacy in Regional Transmission Organization and Independent System Operator Regions" (the "Technical Conference"). As is relevant to New England, representatives from ISO-NE, representatives from the New England states, an industry representative, and the NEPOOL Chair participated in the Technical Conference. NESCOE greatly appreciates the work of the Commission and its staff in holding the Technical Conference, as well as its close attention to resource adequacy, which is a vitally important topic to the region, its states, and New England consumers, who depend on affordable and reliable electric service.

[1] NESCOE is New England's Regional State Committee and represents the collective views of the six New England states. These comments are submitted to FERC on behalf of the States of Connecticut, Maine, New Hampshire, Rhode Island, Vermont, and the Commonwealth of Massachusetts.

As discussed during the Technical Conference, ISO-NE does not anticipate resource adequacy concerns in the immediate term. However, the region's resource adequacy picture is less clear starting in the early 2030s. This uncertainty is driven by several interrelated factors that could challenge resource adequacy. These factors include larger-than-expected load growth; retirement of significant gas, oil, and nuclear resources; and a substantial delay in offshore wind and solar resources coming online.[2]

NESCOE applauds ISO-NE for developing new and sophisticated tools to assess and forecast the region's resource adequacy. Specifically, ISO-NE worked with the Electric Power Research Institute ("EPRI") to conduct a probabilistic energy-security study for the New England region under extreme weather events and developed the Probabilistic Energy Adequacy Tool ("PEAT") to assess energy shortfall risk under various scenarios and on different time horizons. PEAT joins a set of other recently developed or improved analytic tools, as well as the longer-term transmission study process[3] and ISO-NE's recently revamped economic study process.[4] With this strong analytical foundation in place, the critical next step is for ISO-NE to deploy these tools in a coordinated, predictable fashion to provide regular holistic insight into the region's upcoming resource adequacy and energy security needs and to inform potential actions to resolve them.

During the Technical Conference, ISO-NE indicated that the New England states have a joint and complementary role with ISO-NE in ensuring resource adequacy and that the states

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2 *See* Operational Impact of Extreme Weather Events at 190–233, https://www.iso-ne.com/static-assets/documents/100006/operational_impact_of_exteme_weather_events_final_report.pdf; Economic Planning for the Clean Energy Transition: Illuminating the Challenges of Tomorrow's Grid (Oct. 24, 2024) at 22–25, https://www.iso-ne.com/static-assets/documents/100016/2024-epcet-report.pdf.

3 *ISO New England Inc.*, 178 FERC ¶ 61,137, at P15 (Feb. 25, 2022).

4 *ISO New England Inc.*, 191 FERC ¶ 61,211, at P13 (June 20, 2025).

could take various actions to help ensure resource adequacy in New England going forward. The New England states welcome ISO-NE's acknowledgement of the important role that states play in resource adequacy and planning. Whether to help maintain existing resources critical to meeting the region's resource adequacy requirements or to bring new resources online that will further contribute to resource adequacy, the states are exploring various actions, which may include state siting and permitting reforms, competitive state procurements, changes to default service practices, or other policy mechanisms. NESCOE believes that New England will be best positioned to meet future resource adequacy challenges by ISO-NE conducting the analysis described above, including scenarios based on state laws, policies, and plans that are performed on a regular, consistent basis that provides timely insight and the opportunity for action to address emerging issues.

In addition, NESCOE appreciates that ISO-NE is working to implement reforms to the forward capacity market that will shift the region to a prompt and seasonal capacity market with accreditation reforms, which ISO-NE expects will improve power system reliability and cost-efficiency as New England's resource mix evolves.[5]

In closing, NESCOE thanks the Commission for holding the Technical Conference and looks forward to continuing resource adequacy related discussions with the Commission, ISO-NE, and stakeholders.

[5] *See* Capacity Auction Reforms Key Project, https://www.iso-ne.com/committees/key-projects/capacity-auction-reforms-key-project.

Respectfully Submitted,

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Date: July 7, 2025

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 Osterville, Massachusetts this 7th day of July, 2025.

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