

NESCOE Submission Regarding Transmission Needs Driven by State and Federal Public Policy Requirements

March 17, 2026

Pursuant to Section 4A.1 of Attachment K of the ISO New England Inc. (“ISO-NE”) Open Access Transmission Tariff (the “OATT”),¹ the New England States Committee on Electricity (“NESCOE”) hereby provides this submission to ISO-NE regarding transmission needs driven by state and federal Public Policy Requirements (“PPRs”). The Tariff defines a PPR as “a requirement reflected in a statute enacted by, or a regulation promulgated by, the federal government or a state or local (*e.g.*, municipal or county) government.”²

As part of the process laid out in Section 4A.1 of Attachment K of the OATT, NESCOE carefully considers the input that members of the ISO-NE Planning Advisory Committee (the “Stakeholders”) provide regarding state or federal policy-driven transmission needs.³ In this instance, no Stakeholders have identified PPRs or other actions that, in their view, drive transmission needs.

Because there are no Stakeholder-identified state or federal PPRs “driving transmission needs relating to the New England Transmission System” at this time,⁴ NESCOE is not requesting that ISO-NE initiate a Public Policy Transmission Study for the current planning cycle.⁵

Section 4A.1, requires that NESCOE explain why any Stakeholder-identified transmission needs should not be evaluated for potential solutions. Because no Stakeholder has identified PPRs or other actions that, in their view, drive transmission needs, NESCOE does not include such an explanation in this communication.

¹ The OATT is Section II of the ISO-NE Transmission, Markets, and Services Tariff (the “Tariff”). Capitalized terms not defined herein are intended to have the meaning given to such terms in the Tariff.

² Tariff Section I.2.2.

³ ISO-NE typically posts any submissions from Stakeholders on its website. *See, e.g.*, https://www.iso-ne.com/static-assets/documents/2023/03/2023_public_policy_requirements_stakeholder_submittals_combined.pdf.

⁴ Section 4A.1.

⁵ This communication does not reflect NESCOE’s perspective or the perspective of any NESCOE Manager in connection with any particular project proposal(s). Moreover, this communication should not be read as foreclosing transmission developed pursuant to various state laws but rather as a response that there are no Stakeholder-identified PPRs that at this time warrant the study of regionalized, customer-supported transmission solutions.

Conclusion

A thoughtfully planned and appropriately sized transmission system is central to a reliable, affordable, clean grid.

NESCOE looks forward to continuing collaboration with ISO-NE and stakeholders this year and in coming years to advance transmission development. In particular, we appreciate the substantial work ISO-NE has undertaken at our request on the longer-term transmission planning (“LTTP”) process. Once the first LTTP cycle concludes later this year, we look forward to conversations with ISO-NE and stakeholders about efficient approaches to the next cycle.