

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

ISO New England Inc.	)	
Central Maine Power Company	)	
The Connecticut Light and Power Company	)	
Fitchburg Gas and Electric Light Company	)	
Green Mountain Power Corporation	)	
Maine Electric Power Company	)	
The Narragansett Electric Company	)	Docket No. EL26-72
New England Power Company	)	
New Hampshire Transmission, LLC	)	
NSTAR Electric Company	)	
Public Service Company of New Hampshire	)	
The United Illuminating Company	)	
Unitil Energy Systems, Inc.	)	
Vermont Electric Power Company, Inc.	)	
Vermont Transco LLC	)	
Versant Power	)	

**ANSWER IN RESPONSE OF THE NEW ENGLAND STATES COMMITTEE ON
ELECTRICITY TO THE MOTION OF ISO NEW ENGLAND, INC.
AND THE PARTICIPATING TRANSMISSION OWNERS
ADMINISTRATIVE COMMITTEE TO HOLD
PROCEEDING IN ABEYANCE**

Pursuant to the Federal Energy Regulatory Commission’s (the “Commission”) Notice Establishing Answer Period, the New England States Committee on Electricity (“NESCOE”)¹ hereby submits this answer in response to the Joint Motion of ISO New England, Inc. (“ISO-NE”) and the Participating Transmission Owners Administrative Committee (“PTOAC”) on Behalf of the Participating Transmission Owners to Hold Proceeding in Abeyance (the “Joint

¹ On June 23, 2026, 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.

Motion”). For the reasons described below, NESCOE supports the Joint Motion and respectfully requests that the Commission grant it.

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-NE administers.² 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 environmental quality.³ This answer in response represents the collective view of the six New England states.

II. BACKGROUND

On June 18, 2026, the Commission issued an order instituting the above-captioned proceeding pursuant to Section 206 of the Federal Power Act (the “Show Cause Order”).⁴ The Show Cause Order directed ISO-NE and the Participating Transmission Owners to show cause that ISO-NE’s existing Transmission, Markets and Services Tariff (the “Tariff”) remains just and reasonable and not unduly discriminatory or preferential without provisions addressing certain delineated issues related to large and co-located loads.⁵ Although the Commission directed ISO-NE and the PTOs to respond within 60 days of the Show Cause Order, the Commission also

² *ISO New England Inc.*, 121 FERC ¶ 61,105 (2007).

³ See Sept. 8, 2006 NESCOE 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.

⁴ *ISO New England Inc.*, 195 FERC ¶ 61,215 (2026).

⁵ *Id.* at P. 32.

stated that it would consider requests to hold all or certain aspects of the Show Cause Order in abeyance for up to 90 days for the responding parties to work through the stakeholder process to develop FPA Section 205 filings to revise the Tariff.⁶

On August 3, 2026, ISO-NE and the PTOAC filed the Joint Motion. The Joint Motion seeks a 90-day abeyance of the Show Cause Order.⁷ The Joint Motion anticipates that the parties will develop a Section 205 filing that will “address all of the Commission’s concerns in each of the five categories of reform of the Show Cause Order....”⁸ As described in the Joint Motion, the abeyance will allow ISO-NE and the PTOs to present a proposed design and Tariff provisions, as needed, to the New England Power Pool (“NEPOOL”) Transmission Committee and Markets Committee.⁹ The Joint Motion further represents that the NEPOOL Participants Committee would vote on the Section 205 proposal at its November 12, 2026 meeting and that the parties would make their Section 205 filing with the Commission on November 16, 2026.¹⁰

III. ANSWER IN RESPONSE

NESCOE supports ISO-NE and the PTOAC’s request for an abeyance to allow for them to develop a Section 205 filing through New England’s stakeholder process. As the Joint Motion notes, “the request is consistent with the long-standing history of stakeholder engagement in New England.”¹¹ The large load and co-location issues raised by the Show Cause Order are

⁶ *Id.* at PP. 32, 36.

⁷ Joint Motion, at 2.

⁸ *Id.*, at 5.

⁹ *Id.*, at 11.

¹⁰ *Id.*, at 11–12.

¹¹ Joint Motion, at 4.

significant and complex, and ISO-NE and the PTOAC's expected Section 205 filing would likely be made much stronger if developed through New England's robust stakeholder process.

The issues raised in the Show Cause Order are important to NESCOE, and NESCOE plans to fully participate in the regional stakeholder process that the Joint Motion contemplates. Indeed, NESCOE has offered its preliminary input on ISO-NE and the PTOAC's response to the Show Cause Order, identifying certain foundational principles against which it will assess any proposed Section 205 filing.¹² In brief, NESCOE believes that any new regulatory construct should seek to mitigate the ratepayer cost impacts of new large load projects, preserve traditional state authority to regulate large and co-located loads, prioritize reliability, and promote transparency.¹³ NESCOE looks forward to participating in the stakeholder process that will be made possible by the Joint Motion's requested abeyance.

¹² NESCOE, Preliminary Input on ISO-NE's Response to the Large and Co-Located Loads Show Cause Order (July 30, 2026), available at <https://nescoe.com/wp-content/uploads/2026/08/NESCOE-Large-Load-Advanced-Feedback-7-30-26.pdf> (last checked Aug. 7, 2026).

¹³ *Id.* at 2.

IV. CONCLUSION

Therefore, for the reasons stated herein, NESCOE respectfully requests that the Commission grant the Joint Motion.

Respectfully Submitted,

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Date: August 7, 2026

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 August, 2026.

/s/ Nathan Forster

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Shannon Beale, Assistant General Counsel

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