



New England States Committee on Electricity

To: ISO New England
From: NESCOE (Contact: Sheila Keane)
Date: October 9, 2026
Subject: Comments on ISO-NE's Draft 2027 Work Plan

NESCOE appreciates the opportunity to provide preliminary comment on ISO New England's (ISO-NE) Draft 2027 Annual Work Plan (AWP), discussed at the October 2, 2026, NEPOOL Participant's Committee Meeting.¹

In general, NESCOE appreciates and agrees with ISO-NE prioritizing resources to assess and maintain resource adequacy, implement necessary oversight and processes for transmission planning, and improve the transparency and efficiency of interconnection processes. Each bears on consumer costs and warrants the focus and resource allocation ISO-NE sets forward.

NESCOE also recognizes the imperative for ISO-NE to allocate significant human and other resources for cybersecurity monitoring, detection, and recovery tools across all aspects of ISO-NE's work. While that day-to-day work is not visible to states and stakeholders, NESCOE understands its criticality and strongly supports ISO-NE's allocation of time and resources to protecting the power system.

We offer brief comment on three items below.

A Chief Priority: Efficient Interconnection

The timely and cost-effective interconnection of new resources is a chief priority for NESCOE. NESCOE supports the draft 2027 AWP enhancements on generator interconnection. A transparent and efficient interconnection process is essential to the region's ability to integrate affordable and reliable resources in the coming years. Recent experience with the Transitional Cluster Study has brought into sharp focus the need for continued refinements to ISO-NE's interconnection processes under the new cluster study construct. Given that interconnection bears on consumer costs, resource adequacy, and the ability to satisfy the requirements of some states' laws, NESCOE urges ISO-NE to dedicate adequate resources to this work to complete the enhancements in the nearest possible term.

Longer-term Transmission Planning (LTTP)

NESCOE supports the draft 2027 AWP commitment to promptly engage in a lessons learned discussion following the successful completion of the first LTTP solicitation.

¹ https://www.iso-ne.com/static-assets/documents/100039/2027_awp_draft_for_10_02_2026_pc.pdf

The draft 2027 AWP appears to signal ISO-NE's intent to advance a key lesson learned – a change in competitive procurement model – under a separate, accelerated track as part of compliance with FERC Order 1920. NESCOE understands the connection and intent to discuss this change in the context of 1920 compliance. NESCOE requests that any changes to the competitive procurement model proposed as part of 1920 compliance be simultaneously considered and filed at FERC, if supported, as a change to the LTTP model.

LTTP is a forward-looking, proactive transmission planning process that was unanimously supported by the states in light of the central role of states in project selection and cost allocation. While ISO-NE must meet the 1920 compliance deadline, that obligation should run in coordination with adjustments to the region's proven pathway for transmission investment. NESCOE requests that any changes to the region's competitive procurement model in the Order 1920 context be simultaneously implemented in the LTTP provisions to enable the continued, efficient, and timely use of this established and successful planning process.

Demand Response and Load Flexibility

The improved integration and deployment of demand response resources and load flexibility is a critical avenue for the region to ensure it is efficiently using all resources – both supply and load – to support reliability and markets. While not explicitly identified in the draft 2027 AWP, NESCOE understands that ISO-NE views growing demand response in coordination with retail programs as an important area of focus in the coming years. NESCOE supports the allocation of resources to expand opportunities to leverage these resources in a way that prioritizes affordability in the context of large load integration and other workstreams. Better utilization of load side resources will be important as the region heads into the first prompt capacity market auction in spring 2028 given the potential to bring such resources online more quickly than generation resources facing supply chain constraints and other headwinds. NESCOE requests that ISO-NE confirm the scope of load flexibility initiatives in detail as part of the forthcoming strategic planning process expected in early 2027. NESCOE looks forward to continuing to work with ISO-NE, NECPUC, and stakeholders to increase opportunities for these resources, including ways to efficiently align state and ISO-NE market efforts.

NESCOE looks forward to continuing conversation on the draft 2027 AWP with ISO-NE and stakeholders.