

RTO RESPONSIVENESS WORKING GROUP

Proposal for Increased Ratepayer and Consumer Advocate Participation with ISO-NE

ISO-NE has relied heavily on its highly functional working relationship with state regulatory commissions through the New England Commission of Public Utility Commissioners (NECPUC) to demonstrate its responsiveness to regional state stakeholders. In its comments leading to FERC's Order 719, ISO-NE cites to its interaction with NECPUC, including biannual meetings with the ISO-NE Board and the assignment of particular ISO-NE directors to each state Commission to demonstrate responsiveness to the states. Likewise, NEPOOL affords State Commissions and NECPUC access to virtually all of its committee and sub-committee meetings. Overall, ISO-NE and NEPOOL should be commended for including State Commissions and NECPUC in its decision making process and providing the state regulators with direct access to the Board and information through regular briefings.

The RTO Responsive Working Group provides a unique opportunity to build on the NECPUC – ISO-NE model and address a missing component in ISO-NE's relationship and responsiveness to the New England States. In addition to state regulatory Commissions each New England State has public entities that are directly responsible for representing the interests of ratepayers. These include the Attorney General in Massachusetts, the Office of Consumer Counsel in Connecticut, the Attorney General and Rhode Island Division of Public Utilities and Carriers in Rhode Island, the Office of the Public Advocate in Maine, the Office of Consumer Advocate in New Hampshire and the Division of Public Advocacy in Vermont. In addition, other Attorney General's in New England such as the Connecticut Attorney General likewise represent consumer interests in energy related matters. In general, these agencies represent ratepayer interest before state and federal regulators and through the court system pursuing priorities including but not limited to: safe and reliable service; just and reasonable rates; energy policy that puts the interests of customers first, minimizing rate impacts and ensuring long-term, tangible benefits; and preserving consumer protection in deregulated markets.

The New England Ratepayer and Consumer Advocates are important energy policymakers and the heads of these agencies are either appointed or elected to represent ratepayer interests. It is important for these organizations to have access to information and staff at ISO-NE and equally, if not more important, for the ISO-NE Board to meet directly with these state officials. The New England Ratepayer and Consumer Advocates therefore propose that ISO-NE as part of its 719 compliance include a commitment to establish reporting and meeting requirements with the State Ratepayer and Consumer Advocates including but not limited to:

- Biannual Meetings with the ISO-NE Board and ISO-NE Executive Staff
- Assignment of individual directors to each New England Ratepayer and Consumer Advocate (similar to the practice with Commissioners)
- Quarterly Updates/Reports on all ISO-NE and NEPOOL Activities

- Assignment of a permanent point of contact within ISO-NE for the State Ratepayer and Consumer Advocates
- Inclusion in all regional stakeholder meetings or working groups established through or by ISO-NE