ISO new england

Extended-Term/Longer-Term Transmission Planning Phase 2

Introduction

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Project Title: Attachment K Extended-Term/Longer-Term Transmission Planning*

Proposed Effective Date: August 2024

- In the <u>New England States' Vision for a Clean, Affordable, and</u> <u>Reliable 21st Century Regional Electric Grid</u> (Vision Statement), the New England states recommended that ISO identify process changes to allow for a routine transmission planning process to help "inform all stakeholders of the amount and type of transmission infrastructure needed to cost-effectively integrate clean energy resources" and enumerated certain criteria for that framework
 - These changes were addressed through Tariff changes under the Phase 1 effort, which were accepted by <u>FERC in February 2022</u>
- This effort, Phase 2, establishes the rules that enable the states to achieve their policies through the development of transmission to address anticipated system concerns, and the associated cost allocation method

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*The name of this effort was originally "Extended-Term." During the review process, the Tariff language was changed to "Longer-Term."

Background and Purpose

- <u>NESCOE's June 2021 Governor's Report</u> recommended the revisions to the ISO Tariff to "implement a state-led, proactive scenariobased planning process for longer-term analysis of state mandates and policies as a routine planning practice"
- In response, the ISO revised Attachment K of the OATT to incorporate a new transmission planning process primarily focused beyond the current ten-year planning horizon
 - This first phase established the rules to enable the New England states to request that the ISO perform scenario-based transmission planning studies, on a routine basis
 - The Phase 1 rules are reflected in Section 16, Procedures for the Conduct of Longer-Term Transmission Studies (LTTSs)
- Under the current rules, LTTSs, such as the 2050 Transmission Study, are informational studies

Background and Purpose

The second phase of Tariff changes is intended to establish the processes to facilitate the states' achievement of their policy-based goals

- The project will create the process to enable the development of transmission infrastructure to address the findings of a LTTS by:
 - Codifying NESCOE and the ISO's respective roles throughout the process
 - Establishing the cost recovery methodology for resulting transmission
- Additionally, in <u>July 2023</u>, the New England states indicated the potential for increased reliance on the ISO to provide technical assistance in connection with state procurements and efforts to secure transmission-related funding
- The concepts discussed in this presentation are the outcome of joint discussions between the ISO and NESCOE on the processes to address the states' requests
- This is the first meeting at the Transmission Committee to discuss these changes, which are anticipated to be filed with FERC in Q2 2024
 - Today's discussion is limited to high-level concepts for Phase 2
 - Additional discussion on high-level concepts for Phase 2 will be continued at the November TC meeting

Problem Statement

 Modifications to the Tariff are needed to support the states' efforts to meet their State-identified Requirements*

*Tariff Section I.2.2: State-identified Requirement refers to a legal requirement, mandate or policy of a New England state or local government that forms the basis for a Longer-Term Transmission Study request submitted to the ISO pursuant to the process set out in Section 16 of Attachment K of the OATT.

Conceptual Process to Allow for Transmission Development

- The general transmission development process would be divided into the following three steps:
 - Step 1: RFP Determination NESCOE, with ISO technical support, selects system concerns to be addressed through one or more RFPs
 - Step 2: RFP Issuance, Administration, Evaluation ISO issues the RFP, evaluates the submittals, and selects preferred solution
 - Step 3: NESCOE Response Project(s) from the preferred solution included in RSP for cost regional allocation, unless NESCOE requests alternative cost treatment or terminates the process
- The following slides provide additional information on the anticipated conceptual features of each of these steps

Conceptual Process - Step 1: RFP Determination

- After the conclusion of a LTTS, NESCOE may request the ISO to perform follow-up studies based on the LTTS results
 - An LTTS is a study conducted by the ISO in response to a request from NESCOE
 - The 2050 Transmission Study is the first LTTS
- NESCOE will consult with the ISO on possible RFPs based on the results of the LTTS, NESCOE-requested follow-up studies (if applicable), or known long-term system concerns such as non-time-sensitive reliability, economic, or public policy needs
- NESCOE determines which potential system concerns will be included in an RFP(s) and requests the ISO to issue RFPs

Conceptual Process - Step 2: RFP Issuance, Administration, Evaluation

- The ISO issues the RFP:
 - A single stage process is under consideration
 - This is different from the two phase/stage process that already exists in the competitive transmission development portions of Attachment K
 - Qualified Transmission Project Sponsors (QTPSs) submit proposals to the ISO, along with \$100k deposit per proposal
 - Joint proposals would continue to be permitted similar to the competitive transmission development portions of Attachment K
 - No QTPS cost recovery for development of proposals
 - No backstop solution to be submitted by incumbent PTOs
 - Each submitted proposal must meet all needs identified in the RFP (no partial solutions permitted)
- After consideration of the evaluation factors, ISO selects the preliminary preferred solution, which is discussed with PAC

Conceptual Process - Step 3: NESCOE Response

- Within a certain timeframe of the ISO selection of the preliminary preferred solution NESCOE may:
 - Provide notice to the ISO in support of continuing the process, but provide an alternative cost allocation methodology
 - Provide notice to the ISO to terminate the process
 - ISO would then terminate the process
- If the process is not terminated, the ISO proceeds with one of two possible cost allocation methodologies:

- The NESCOE provided alternative cost allocation methodology
- If no notice is provided by NESCOE, the costs for the preferred solution are allocated regionally, similar to reliability projects
- The ISO would issue the Selected Qualified Transmission Project Sponsor Agreement (SQTPSA)
 - The QTPS has 30 days to accept responsibility

Additional Process Details that need to be Addressed

- Adding evaluation factors as part of a cost benefit analysis beyond the evaluation factors that are currently described in Attachment K
 - Focusing on production cost savings and reliability improvements

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10

- Allow for termination of the process by the ISO
- Address failure of a QTPS to proceed with project development
- Address ISO technical support of state RFPs

Additional Discussion – Assignment to Incumbents

- The ISO and NESCOE have been discussing two additional concepts and are looking forward to stakeholder feedback
 - Assignment to incumbent PTOs
 - Combining needs

Additional Discussion – Assignment to Incumbents

- Should a process be included to identify whether some needs/solutions are best assigned to incumbent TOs, rather than being part of an RFP?
 - For example: Rebuilding existing transmission lines, or adding relatively inexpensive equipment within existing substations
- If such a process is adopted, are there any concepts that could be applied to ensure cost containment or cost certainty for the needs/solutions assigned to incumbent TOs?
- Based on the ISO's experience gained during the Boston 2028 RFP and through the 2050 Transmission Study, there are areas where the assignment of certain needs/solutions to the incumbent TOs may allow non-incumbents to focus on areas where they may be able to propose more cost-effective solutions

Additional Discussion – Combining Needs

- There may be opportunity to combine non-time-sensitive reliability and economic needs into a longer-term RFP that allows a single solution to address all of the needs in an area
 - Would require the needs to be identified around the same time; may make the timing of LTTS RFP initiation process variable
 - An LTTS RFP can be initiated at any point after completion of an LTTS, so long as the next LTTS has not begun
 - This allows the LTTS RFP to be held back for a period of time while other studies are being completed
- This process would need to describe what happens if the LTTS RFP is terminated at any point
 - There would still be reliability and economic needs that must be resolved

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13

Conclusion

- The ISO is developing Tariff modifications to support the states in achieving their State-identified Requirements
- Further conceptual discussion will occur at the November TC meeting

Stakeholder Schedule*

Proposed Effective Date – August 2024

Stakeholder Committee and Date	Scheduled Project Milestone
October 17, 2023	Discussion of concepts to be included in upcoming Tariff revisions
November 21, 2023	Respond to stakeholder questions from previous meeting and further discussion of concepts to be included in upcoming Tariff revisions
December 20, 2023	Respond to stakeholder questions from previous meeting and initial review of proposed redlines
January 23, 2024	Respond to stakeholder questions from previous meeting and review of proposed redlines
February 15, 2024	Respond to stakeholder questions from previous meeting and review of proposed redlines
March 27, 2024	Vote on the proposed Tariff revisions and any proposed amendments
Participants Committee April 4, 2024	Vote

*Note: Schedule will be updated to account for PTO AC review. The need for discussion at other NEPOOL Committees and other stakeholder groups is under review. Schedule will be updated accordingly to reflect any additional review needed.

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15

Questions

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