

07/22/2024

To:

ISO New England

James Woods, Secretary, NEPOOL Markets Committee

Emily Laine, Chair, NEPOOL Markets Committee

Re: Co-located Accreditation under CAR

Dear ISO-NE Team,

Thank you for the opportunity to provide the following feedback on ISO-NE's CAR initial scoping considerations.

We strongly support ISO-NE's continued assessment of enhancements to the modeling framework for co-located resources, and the inclusion of that work in the scope of the Capacity Auction Reforms project. We believe this work supports the ISO's Objective #2 to "prioritize design work that provides the most value to the region in the shortest time", as there are likely simple changes that can be made to the ISO's previously proposed co-located accreditation process which would not take significant staff time to implement, and which would more accurately reflect these resources' expected performance during hours that impact reliability.

The accurate accreditation of this rapidly growing resource class is important both to the overall economic efficiency of the ISO's capacity market design and to the region's decarbonization goals. We have previously passed along to ISO-NE staff preliminary suggestions for changes to the co-located accreditation process and are happy to continue working with the ISO on those or other ideas.

Sincerely,

BLUEWAVE

Michael Berlinski, Director of Federal Policy and Regulatory Affairs



Aidan Foley, Founder and CEO



Alex Chaplin, Manager, Utility-Scale Policy and Business Development



Doug Matheson, Director, Energy Markets