

07/22/2024

To: ISO New England  
James Woods, Secretary, NEPOOL Markets Committee  
Emily Laine, Chair, NEPOOL Markets Committee

**Re: Capacity Deliverability Process for State-Jurisdictional Interconnections under CAR**

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

Designing the new capacity market qualification process will, of course, be a required component of the CAR project scope and we strongly recommend ISO-NE design as part of that process the ability for resources not subject to the ISO-NE interconnection process (i.e., those subject to state interconnection processes) to secure capacity deliverability (i.e. obtain a CNRC value) on a "forward" basis. It is important that these resources obtain certainty as to their ability to participate in the capacity market before the resources are constructed (and thus before the "prompt" capacity auction qualification process), as such information can be a critical component of the decision whether (or where) to construct those resources. Such a "forward" capacity deliverability assessment for these projects would be consistent with how resources subject to the ISO-NE interconnection process secure CNRIS via the new cluster process and is consistent with how such resources secure a CNRC under the current FCA construct.

Sincerely,



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



Doug Matheson, Director, Energy Markets