

July 22, 2024

James Woods, NEPOOL Market Committee Secretary,

NextEra Energy Resource (NEER) thanks ISO New England (ISO-NE) and the NEPOOL Markets Committee (MC) for the opportunity to provide additional written feedback as a supplement to our comments during the July 9-10 MC's Capacity Auction Reforms (CAR) scope of work kick-off discussion.

At this time, NextEra's primary concerns are largely captured in the communications from NEPGA. However, we would like to share one concern with ISO-NE's intent to take a "phased approach" in filing CAR related changes with the Federal Energy Regulatory Commission (FERC) and the apparent prioritization of elements within those filings. Based on the MC discussion and previous ISO-NE statements, it is our understanding that ISO-NE intends to first file "retirement reforms" and a prompt capacity market design, followed by a second filing that includes a seasonal market design and Resource Capacity Accreditation (RCA) changes.

This phased filing approach creates a risk that the region could be in the unacceptable position of running FCA-19 without RCA changes in place, a risk that we think is higher than if ISO-NE were to file everything together. It is NextEra's view that RCA design and implementation should be the highest priority for ISO-NE, with the prompt/seasonal market elements viewed as enhancements to increase RCA's efficiency and impact. Consequently, ISO-NE should consider including RCA changes in its first filing to ensure the region has these necessary reforms in place for FCA-19 or the opportunity to respond to any deficiencies identified by FERC.

Thank you again for the opportunity to provide feedback and consideration of our comments, we look forward to continued stakeholder discussions going forward.

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