



NEW ENGLAND STATES COMMITTEE ON ELECTRICITY

POTENTIAL TRANSMISSION NEEDS FOR A LONGER-TERM TRANSMISSION PLANNING RFP

Comments of Central Maine Power Company November 22nd, 2024

Central Maine Power Company (“CMP”) submits these comments to the New England States Committee on Electricity (“NESCOE”) and the Independent System Operator of New England (“ISO-NE”) in response to NESCOE’s letter (“the Letter”) to ISO-NE regarding Potential Transmission Needs for a Longer-Term Transmission Planning (“LTTP”) Request for Proposals (RFP), in which NESCOE seeks feedback regarding the best way to achieve its stated objectives of (1) strengthening the connection between Northern and Southern New England and (2) facilitating the integration and deliverability of additional affordable generation resources located in northern Maine beyond the Surowiec South interface, as well as feedback regarding the specific preliminary needs identified in the Letter and any other feedback that may increase the likelihood of a successful solicitation.¹ CMP commends NESCOE and ISO-NE for their efforts to enhance regional collaboration and establish a robust process for longer-term regional transmission planning and investment. CMP appreciates the opportunity to provide comments regarding the scope and structure of the upcoming ISO-NE LTTP RFP and looks forward to continued active participation in this effort.

CMP serves approximately 653,170 electricity customers in an 11,000 square-mile service area in central and southern Maine. We strive daily to provide safe, reliable service to customers and value to our communities. CMP is a subsidiary of Avangrid, Inc., a leading, sustainable energy company with approximately \$44 billion in assets and operations in 24 U.S. states. Avangrid is part of the Iberdrola Group. Iberdrola, S.A. is an energy pioneer with one of the largest renewable asset bases of any company in the world.

¹ <https://nescoe.com/resource-center/lttp-rfp-letter/>



Avangrid has two primary lines of business, networks and renewables. Avangrid owns eight electric and natural gas utilities, serving more than 3.3 million customers in New York and New England, including The United Illuminating Company and CMP. Avangrid also owns and operates a portfolio of over 9,000 MW of renewable energy generation facilities across the U.S. Avangrid is actively developing some of the largest projects advancing New England’s clean energy future: the New England Clean Energy Connect (“NECEC”), a 1200 MW High Voltage Direct Current (“HVDC”) transmission line to import emissions free hydroelectricity from Quebec to the ISO-NE grid; Vineyard Wind 1, an 800 MW offshore wind project jointly developed by Avangrid and Copenhagen Infrastructure Partners; and New England Wind 1, an 804 MW offshore wind project.

CMP hopes that NESCOE and ISO-NE find these comments helpful in finalizing the scope and structure of the upcoming RFP to ensure a successful solicitation that achieves NESCOE’s stated goals of strengthening the connection between Northern and Southern New England and facilitating the integration and deliverability of additional affordable generation resources.

I. Background

The New England States (“the States”) have set ambitious clean energy and decarbonization goals, and proactive and coordinated regional transmission planning is essential to ensure that the States continue making progress towards these goals in the long-term. To this end, NESCOE recommended in its October 2020 correspondence titled “New England States’ Vision for a Clean, Affordable, and Reliable 21st Century Regional Electric Grid” (“the Vision Statement”) that ISO-NE conduct a comprehensive long-term regional transmission study informed by the future resource scenarios identified in the various States’ analyses of pathways to decarbonization.² Additionally, the Vision Statement recommended that ISO-NE identify and implement tariff changes required to

² [New England States Vision Statement | NESCOE](#)



conduct detailed planning processes to maximize the use of existing transmission, build new transmission only where absolutely necessary, and use competitive solicitations to minimize costs to consumers.

In response to the Vision Statement, ISO-NE conducted the 2050 Transmission Study, the first study of its kind in New England, which identified high-likelihood concerns that are likely to bring the greatest benefit for a wide range of possible future conditions as the clean energy transition accelerates.³ The study also identified roadmaps for transmission upgrades to inform stakeholders of the amount and type of transmission infrastructure necessary to provide reliable, cost-effective energy to the region throughout the clean energy transition. Additionally, ISO-NE revised Attachment K of the ISO-NE Open Access Transmission Tariff (“OATT”) to incorporate a new longer-term transmission planning process looking beyond the traditional 10-year planning horizon and to adopt a new competitive process to solicit solutions to transmission needs identified by NESCOE based on the results of long-term transmission planning studies conducted by ISO-NE, such as the ISO-NE 2050 Transmission Study.⁴

NESCOE subsequently issued a public letter to ISO-NE regarding Potential Transmission Needs for a Longer-term Transmission Planning RFP on October 16, 2024, in which NESCOE “identified possible needs requiring competitive solutions... based on both the analysis in the 2050 Transmission Study and subsequent consultation with ISO-NE.”⁵ In this letter, NESCOE proposed potential requirements and recommendations for an RFP to solicit transmission solutions to address the identified need of “strengthening the connection between northern and southern New England and facilitating the integration and deliverability of additional affordable generation resources,” namely:

³ iso-ne.com/static-assets/documents/100008/2024_02_14_pac_2050_transmission_study_final.pdf

⁴ [er24-1978-000.pdf \(iso-ne.com\)](https://iso-ne.com/static-assets/documents/100008/2024_02_14_pac_2050_transmission_study_final.pdf)

⁵ [Letter on Potential Transmission Needs for a Longer-term Transmission Planning RFP | NESCOE](#)

1. “a requirement to increase the Maine-New Hampshire interface capacity to at least 3,000 MW by 2035 and increase the Surowiec-South interface capacity to at least 3,200 MW by 2035;
2. a requirement or recommendation to increase the capacity of additional interfaces (e.g., Orrington-South, North-South, or others); or
3. a requirement that any solution facilitate the interconnection of a minimum amount of new generation capacity at substations above the Surowiec-South interface; or
4. a strong preference for solutions that facilitate the interconnection of incremental generation north of the Surowiec-South interface.”

II. Comments and Responses to NESCOE Letter

CMP organizes its comments as follows:

- A. Feedback regarding the best way to achieve the stated objective of strengthening the connection between Northern and Southern New England.
- B. Feedback regarding the best path to achieve the stated objective of facilitating the integration and deliverability of additional affordable generation resources located in northern Maine beyond Surowiec.
- C. Feedback regarding the specific preliminary needs and considerations identified in the Letter.
- D. Feedback to increase the likelihood of a successful solicitation.

A. Feedback regarding the best way to achieve the stated objective of strengthening the connection between Northern and Southern New England.

CMP supports NESCOE’s stated objective of strengthening the connection between Northern and Southern New England and supports NESCOE’s initiative to achieve this objective through expanding the transfer capability of the transmission interfaces connecting Northern and Southern New England. While expanding the transfer capability

of the Surowiec-South and Maine-New Hampshire interfaces will be necessary to achieve this objective, there is also value in soliciting a solution to address transmission constraints between Northern and Southern New England. This might be achieved by issuing a separate RFP that addresses these additional requirements to increase the capacity of the North-South and Boston import interfaces in line with the North-South and Boston Import Roadmap identified in the 2050 study.⁶

B. Feedback regarding the best path to achieve the stated objective of facilitating the integration and deliverability of additional affordable generation resources located in northern Maine beyond Surowiec.

NESCOE “*seeks feedback on the best way to achieve the stated objectives of (1) strengthening the connection between northern and southern New England and (2) facilitating the integration and deliverability of additional affordable generation resources located in northern Maine beyond Surowiec.*” A transmission solution that strengthens the connection between northern and southern New England will have broader benefits than a transmission solution integrating generation resources in Northern Maine. An AC solution addressing the interfaces will allow for the flow of generation from anywhere in Maine to load South of the interfaces, not just Northern Maine generation, and will also reduce future congestion on the bulk power system. Such a solution may also allow for power to flow North if necessary to meet increased load growth in Maine. CMP supports efforts to enable the integration and deliverability of additional affordable generation resources located in Northern Maine beyond Surowiec, but as separate solutions, under separate solicitations, from the solutions addressing the interfaces.

NESCOE states that including a requirement for solutions that extend further North into Maine past the Surowiec-South interface “may hinder the success of a potential RFP

⁶ iso-ne.com/static-assets/documents/100008/2024_02_14_pac_2050_transmission_study_final.pdf

by unduly limiting the pool of bids or by reducing the likelihood of soliciting a cost-effective solution.” The interconnection of additional affordable generation resources located in Northern Maine beyond the Surowiec South and Orrington South interfaces will require over 100 miles of new and upgraded transmission between Aroostook County, where these new affordable generation sources are located, and substations well north of Surowiec such as Coopers Mills. As identified in the 2050 Study, additional upgraded transmission miles would also be needed to incorporate offshore wind generation interconnecting further up the coast and/or additional land-based renewable generation Downeast Maine. While enabling the integration of affordable generation sources north of Surowiec is an important goal for the region, it is separate and discrete from the need to increase transfer limits between northern and southern New England and is more logically addressed through a separate RFP.

Additionally, if the LTTP RFP includes “a strong preference” or “recommendation” that proposed solutions include transmission North of Surowiec to interconnect resources in Northern Maine rather than a requirement, this risks a further multiple-year delay of the construction of this much-needed infrastructure to Northern Maine and the new renewable energy generation resources that it would enable. The Maine Public Utilities Commission (“Commission”) has already been authorized by recently passed legislation to solicit transmission solutions to interconnect up to 1200MW of affordable clean energy generation resources in Northern Maine.⁷ If the LTTP RFP recommends but does not require this transmission North of Surowiec help interconnect these new resources, the Commission may delay issuing this separate RFP until after a transmission solution has been selected in the LTTP RFP to avoid duplicative procurement processes. It is entirely possible in this case that ISO-NE could select a transmission solution that satisfies the requirements of the RFP but does not include the necessary transmission to integrate these resources, at which point the Commission or ISO-NE would need to issue a separate RFP,

⁷Public Law 2023, Ch. 660.

https://www.mainelegislature.org/legis/bills/display_ps.asp?ld=1963&PID=1456&snum=131

after a lengthy delay.

C. Feedback regarding the specific preliminary needs and considerations identified in the Letter.

As stated in Section II.A of this document, there is value in considering the increase of capacity of additional interfaces other than the Maine-New Hampshire and Surowiec-South interfaces such as the North-South and Boston import interfaces, which would more fully strengthen the connection between Northern and Southern New England. If NESCOE seeks to expand the transfer capacity of additional interfaces such as the North-South interface, NESCOE should clearly define in a separate RFP the requirements for which interfaces they seek to expand and the capacity that they seek these interfaces to be expanded to, similar to the Surowiec-South and Maine-New Hampshire requirements in the Letter.

Additionally, NESCOE has identified a preliminary requirement for the RFP that transmission solutions "increase the Maine-New Hampshire interface capacity to at least 3,000 MW by 2035 and increase the Surowiec-South interface capacity to at least 3,200 MW by 2035." CMP recommends that NESCOE and ISO-NE consider instead soliciting solutions that expand these interfaces by a specified amount such as 1,000 MW because these existing transfer capability limits may change over the course of the LTTP process due to developments independent of the RFP such as generator interconnection upgrades.

CMP recommends that NESCOE and ISO-NE clearly define the needs to be addressed by transmission solutions in the upcoming LTTP RFP through specific measurable requirements and avoid "recommendations" or "preferences." To the extent that NESCOE and ISO-NE include recommendations or preferences beyond the requirements of the RFP, clarity should be provided on how expanded solutions that address these recommendations or preferences will be valued. Additionally, CMP recommends that NESCOE and ISO-NE avoid combining transmission interface needs

with needs tied to specific generation into one RFP. CMP suggests these recommendations to ensure a successful and competitive solicitation, as is described in greater detail in Section II.D of this document below.

Given this LTTP process is a new process, ISO-NE and the states should err on the side of a well-defined RFP scope that maximizes the potential for a successful solicitation. This allows for better comparison across projects and can spread out cost impacts of these major investments for the region's ratepayers. A well-defined RFP scope will enable better project comparisons during the evaluation stage by, for instance, reducing uncertainty in the cost-benefit analysis as to the timing and type of potential new renewable generation additions relative to the timing of the transmission solutions to enable the amounts and generation profiles of such new renewable capacity additions.

D. Feedback to increase the likelihood of a successful solicitation.

Clear Project Requirements

Specific project requirements and selection criteria are critical to ensure a clear and objective evaluation process, and do not necessarily conflict with NESCOE's stated goal of avoiding an overly prescriptive scope. Including "recommendations" or "preferences" in the RFP may result in too wide an array of potential solutions with dissimilar costs and benefits that could further complicate the evaluation process, which is already anticipated to take approximately one year to complete. NESCOE can and should identify specific needs to be addressed by transmission solutions solicited through the LTTP while also giving developers the flexibility to propose different potential transmission solutions to address these needs, which is a model that has proved successful in other markets. This is the approach that the New York Independent System Operator ("NYISO") has utilized in its Public Policy Transmission Need ("PPTN") process⁸. NYISO has issued four RFPs to date under the PPTN process, successfully soliciting billions of dollars in transmission

⁸ [M-36 Public Policy Manual v1.0 Final.pdf \(nyiso.com\)](#)



investment. The NYISO PPTN process has exhibited robust competition and a wide array of solutions to identified needs, and most importantly, has selected projects that are viable and have either come into service or are making real progress towards targeted in-service dates.

Emphasis on Project Viability

The most important aspect of any successful transmission solicitation is ensuring that the necessary transmission infrastructure solicited in the RFP is ultimately built, which make it critical that factors relevant to project viability such as site control are highly weighted in the evaluation criteria. In the interest of ensuring that new transmission is built in a reasonable timeframe, and to prevent the possibility of project cancellations or significant delays, ISO-NE should place emphasis on evaluating “potential siting/permitting issues or delays” in their evaluation process to select a preferred Longer-Term Transmission Solution in accordance with Section 16.4(h) of Attachment K of the ISO-NE OATT, and not simply select the proposed solution with the lowest life-cycle cost and / or highest Benefit to Cost Ratio (“BCR”).⁹ This is especially pertinent as NESCOE and ISO-NE prepare to issue an RFP to address transmission needs primarily located in Maine, considering the challenges faced by recent transmission development efforts in the state.

III. Conclusion

CMP respectfully thanks NESCOE for the opportunity to provide information that may inform the scope and structure of the upcoming ISO-NE LTTP RFP. CMP supports the initiative and recognizes the need to strengthen the connection between northern and

⁹ [sect ii att k.pdf \(iso-ne.com\)](#)



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southern New England and facilitate the integration and deliverability of additional affordable generation resources. CMP recommends that NESCOE and ISO-NE ensure a successful RFP by soliciting transmission solutions for clearly defined needs while allowing developers flexibility to propose different solutions to meet these needs, and prioritizing project viability in the selection process.

Submitted this 22nd day of November 2024.

Central Maine Power Company

A handwritten signature in blue ink that reads "Joseph Purington". The signature is fluid and cursive, with the first name and last name clearly legible.

Joseph Purington
President & CEO