



To: New England States Committee on Electricity (NESCOE)  
Cc: ISO New England (ISO-NE) Planning Advisory Committee  
Al McBride, Vice President, ISO-NE

November 22, 2024

*Via E-mail*

Re: NESCOE's October 16, 2024 Letter, "Potential Transmission Needs for a Longer-Term Transmission Planning RFP"

Dear NESCOE Managers and Staff:

Clearway Energy Group (Clearway)<sup>1</sup> appreciates the opportunity to provide feedback in response to NESCOE's October 16, 2024 letter to ISO New England (Oct. 16 NESCOE Letter) regarding potential transmission needs for a Request for Proposals under the Longer-Term Transmission Planning (LTP) process (the LTP RFP). As discussed below, we:

- Applaud the leadership of the New England states in advancing this important and unique opportunity to unlock low-cost, reliable, clean energy from northern Maine (section 1);
- Urge NESCOE and ISO-NE to ensure that the LTP RFP results in successful awards in 2026, and is designed to complement a transmission procurement from the State of Maine, if needed (section 2); and
- Recommend that NESCOE define the transmission need as a minimum of 1,200 MW deliverable from northern Maine generation, while enabling optionality to surpass that amount (section 3).

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<sup>1</sup> Clearway Energy Group is leading the transition to a world powered by clean energy. Along with our public affiliate Clearway Energy, Inc., our portfolio comprises approximately 11.4 GW of gross generating capacity in 26 states, including 9 GW of wind, solar, and energy storage assets, and over 2.4 GW of conventional dispatchable power generation providing critical grid reliability services. As we develop a nationwide pipeline of new energy projects for the future, Clearway's fleet of emissions-free assets generates enough reliable electricity to power more than 2 million homes today. Clearway Energy Group is headquartered in San Francisco with offices in Denver, Houston, Phoenix, Princeton, and San Diego.

**1. The LTTP RFP is a unique opportunity to build backbone transmission needed to unlock low-cost, reliable, clean energy from northern Maine.**

Clearway applauds the leadership of the New England states, through NESCOE, in securing FERC approval for the LTTP Phase 2 rules and now taking an important step toward a first solicitation under this new transmission planning framework. As the developer of the utility-scale County Wind farm in Aroostook County, Maine, Clearway has long seen the potential of northern Maine renewables—including up to 3 GW of onshore wind and solar, in Aroostook County alone—to deliver low-cost, clean power for New England ratepayers. Onshore renewables represent the least-cost option for New England states to achieve their public policy goals for reliable, affordable, clean energy—even after accounting for the costs of network upgrades.<sup>2</sup> More importantly, given recent setbacks in developing offshore wind resources, onshore renewables in northern Maine represent the *only* near-term path to achieving those goals.

The primary roadblock to developing, financing, and building these beneficial northern Maine projects is the lack of a viable transmission solution to deliver this affordable, clean energy to load centers in New England. NESCOE's letter appropriately recognizes this urgent need and seeks to address it. We stand ready to support NESCOE and ISO-NE as they work collaboratively with stakeholders to ensure a timely and successful solicitation for this needed transmission.

**2. Time is of the essence. NESCOE and ISO-NE should ensure that the LTTP RFP is designed to result in successful awards in 2026, in tandem with a Maine PUC transmission RFP (if needed).**

The top priority for the LTTP RFP should be successful awards that enable construction of transmission infrastructure to deliver low-cost northern Maine generation as soon as possible. That requires clarity in scope so that if, based on the scope of the LTTP RFP, the Maine Public Utilities Commission (Maine PUC) will also need to issue its own transmission RFP in order to result in adequate infrastructure to deliver northern Maine generation to the ISO-NE system, the Maine PUC will be able to issue its RFP on a timeline that aligns with the LTTP RFP, resulting in complementary awards in early 2026. Given the 5+ years lead time to site, permit, and construct

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<sup>2</sup> For example, average onshore wind prices for the Eastern U.S. are approximately \$0.045/kWh, roughly half the average annual wholesale power price in ISO-NE. See Lawrence Berkeley National Laboratory, "Land-based Wind Market Report (2024 Ed.)," p. 48, [https://emp.lbl.gov/sites/default/files/2024-08/Land-Based%20Wind%20Market%20Report\\_2024%20Edition.pdf](https://emp.lbl.gov/sites/default/files/2024-08/Land-Based%20Wind%20Market%20Report_2024%20Edition.pdf) (accessed Nov. 21, 2024).

Additionally, preliminary results from ISO-NE's 2024 Economic Study show that onshore wind is the least-cost resource for carbon abatement. See ISO-NE, "2024 Economic Study," slides 6 & 30, [https://www.iso-ne.com/static-assets/documents/100017/a05\\_pac\\_2024\\_economic\\_study\\_preliminary\\_policy\\_scenario\\_results.pdf](https://www.iso-ne.com/static-assets/documents/100017/a05_pac_2024_economic_study_preliminary_policy_scenario_results.pdf) (accessed Nov. 21, 2024).

transmission infrastructure, RFP award(s) in 2026 is a critical path milestone toward achieving New England states' 2030 climate and energy policy goals.

If the LTTP RFP scope partially overlaps with the scope of a Maine PUC RFP issued around the same time, the Maine PUC RFP would likely need to indicate that award(s) under that procurement may be modified based on LTTP awards.

**3. Clearway recommends NESCOE define the transmission need as a minimum of 1,200 MW deliverable from northern Maine generation, while enabling optionality to surpass that amount.**

To ensure that the LTTP RFP achieves the stated objectives of New England states, Clearway recommends that NESCOE define the transmission need in terms of a minimum requirement to enable 1,200 MW of northern Maine generation deliverable from the Orrington-South interface to points south.

Establishing a minimum requirement will guarantee that selected transmission projects support NESCOE's objective of "facilitating the integration and deliverability of additional affordable generation resources located in northern Maine beyond Surowiec." As a starting point, it would be appropriate to set this minimum at 1,200 MW, which corresponds to the current loss-of-source limit and aligns with injections assumed in ISO-NE's Third Maine Resource Integration Study. Requiring deliverability would right-size transmission upgrades to capture the full value of northern Maine generation, including capacity attributes needed to support resource adequacy in ISO-NE.

Consistent with NESCOE's desire for the LTTP RFP scope to "allow bidders sufficient flexibility to propose a variety of potential solutions,"<sup>3</sup> it could be beneficial for ISO-NE to solicit multi-part bids (i.e., tiered configurations) to evaluate the benefits and costs of surpassing that minimum. For example, the Joint ISO/RTO Planning Committee (JIPC) is studying whether the current loss-of-source limit of 1,200 MW could be raised to 2,000 MW. While those study results are anticipated in mid-2025, it is unclear when a change to the limit could be made. If the limit is ultimately increased during the 1-year bid evaluation phase, multi-part bids that contemplate a larger injection capacity could result in selection of a more ambitious transmission solution while still respecting the benefit-to-cost requirements of the LTTP Phase 2 process.

To unlock the full potential of up to 3,000 MW of northern Maine generation, the loss-of-source limit ultimately is the binding constraint on a single transmission solution. Thus NESCOE may wish to define the need in a sufficiently flexible way to solicit bids involving multiple paths, or to allow ISO-NE to bifurcate the RFP to solicit two transmission solutions. However, if that introduces unmanageable complexity into the solicitation process, it may be advantageous for

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<sup>3</sup> Oct. 16 NESCOE Letter at 2.

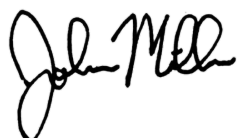
this first RFP to focus on what can be accomplished fairly quickly, while leaving the door open to procure additional transmission capacity in the future.

As for the location, defining the need to extend up to the Orrington-South interface will result in a true regional transmission solution that delivers northern Maine generation to load centers in southern New England. Meanwhile, the benefit-to-cost requirements of the LTTP Phase 2 process guarantee that any transmission solution selected delivers value for money, protecting ratepayers from bearing unreasonable costs. In turn, reinforcing the transmission system as far north as the Orrington-South interface would de-risk the buildout of complementary transmission (to be procured by the Maine PUC through the Northern Maine Renewable Development Program) that will collect and deliver northern Maine generation to the ISO-NE system.

#### **4. Conclusion**

Clearway appreciates NESCOE's leadership on this important issue and we value the opportunity to comment on the Oct. 16 NESCOE Letter. The LTTP RFP presents an exciting and rare opportunity to advance the New England states' goals for reliable, affordable, and clean energy. Clearway stands ready to help NESCOE and ISO-NE answer questions regarding how to sequence the development of transmission and generation to unlock the full potential of northern Maine renewables for New England ratepayers. We look forward to next steps in this endeavor.

Sincerely,

A handwritten signature in black ink, appearing to read "John Miller", with a stylized, cursive script.

John Miller  
Director, Market Policy  
Clearway Energy Group  
john.miller@clearwayenergy.com  
240-630-2201 cell