

BRUCE MCKINNON – PUBLIC STAKEHOLDER

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Sent: Friday, October 18, 2024 2:03:11 PM

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Subject: PAC October Agenda Item No.3

Heather, Jeff;

I am disappointed in NESCOE's terminology choices it uses in its efforts to inform the ISO and NEPOOL Stakeholders of your interests in properly augmenting the existing transmission grid to service the region's future electric energy needs.

First, not recognizing that the ISO considers keeping the "lights on" as its primary responsibility and interprets all messages with that in mind >and translates vague definitions such as "generating resources" into RELIABILITY terminology such as "Qualified Capacity" as used in their reliability calculations. Intermittent resources are heavily discounted in magnitude during that nomenclature change. The Public Policy sensitivity of your terminology to "Green Energy" and associated nameplate values is quickly overlooked.

A similar interpretation is also applied in the utilization of the word "economics" as hard dollar exchanges come to the forefront without including societal and public financing costs.

Second, while I am pleased with your offerings related to the North/South interfaces, I am further disappointed that you do not see any need to forestall the development of similar transmission issues developing on the integration of Offshore Wind Resources into the Rest of New England, both within and beyond the SEMA/RI border's export interfaces. I suspect that the expansion of BESS resources in the "Rest of Pool" areas looking for "surplus" charging energy, off-peak, from these OSW resources will be constrained by insufficient transmission exporting capability to the extent that the OSW installations will be operating under DNE procedures, when strong winds are blowing, making more available energy output than the QC values used for PTF network design and construction decisions allow for.

Your message needs reinforcement with better terminology that focuses upon Public Policy green energy concerns and "right sizing" for the future.

BRUCE