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From: Massachusetts Office of the Attorney General and the New Hampshire Office of the Consumer Advocate
Date: November 22, 2024
Subject: October 16, 2024 NESCOE Letter to ISO-New England Regarding Potential Transmission Needs for a Longer-Term Transmission Planning RFP
CC: Planning Advisory Committee (PAC), pacmatters@iso-ne.com

The Massachusetts Office of the Attorney General and the New Hampshire Office of the Consumer Advocate (together the “Consumer Advocates”) provide the following response to the NESCOE letter to ISO-New England (the “ISO”) dated October 16, 2024 regarding NESCOE’s interest in moving forward on a first request for proposals (“RFP”) under the recently-approved Longer-Term Transmission Planning (“LTTP”) protocol. The Consumer Advocates are encouraged to see NESCOE moving this process forward and seeking to address needs identified in the ISO’s 2050 Transmission Study by focusing the first RFP on increasing the transfer capability within the New England system to allow more power to flow from Maine to New Hampshire and into southern New England. The Consumer Advocates generally support this approach and focus on facilitating the integration of affordable new generation to increase reliability and improve market dynamics. The Consumer Advocates offer the below comments and questions out of an interest in better understanding NESCOE’s proposal so that the Consumer Advocates can offer constructive feedback and suggestions as the process unfolds.

We appreciate NESCOE’s efforts to focus on cost-effective outcomes, as noted in NESCOE’s letter. To help facilitate this shared goal, the Consumer Advocates seek to enhance our ability to participate more proactively in the LTTP process and to be included in critical discussions at key decision points to assure ratepayer interests are effectively represented and meaningfully considered. The Consumer Advocates look forward to continuing discussions with NESCOE and enhancing the participation by consumer advocates in the region.

Further, the Consumer Advocates request that NESCOE provide additional information in response to the following questions:

1. Footnote 2 of the letter notes the four areas of concern identified by the ISO in the 2050 Transmission Study, including the North-South interface issues NESCOE is focusing on for this RFP. Please explain how NESCOE determined to focus on the North-South interface, including the factors that caused NESCOE to prefer this issue over the others identified by the ISO.
2. Page 2 of the letter notes that “recent studies” indicate the potential for “on the order of” 3,000 megawatts of generation capacity to be developed in northern Maine. Please

identify the referenced studies and the range of capacity that is anticipated in each identified study as having potential for development in northern Maine.

3. Page 2 of the letter notes that NESCOE has had consultations with the ISO subsequent to the 2050 Transmission Study and that those consultations helped to identify particular needs to be addressed through the LTTP process. Please describe those consultations and how they led to the development of the needs identified in the letter, and the selection of the North-South interface as the focus of the first LTTP RFP.
4. Pages 2-3 of the letter describe various ways to facilitate integration of generation in Maine into the regional network. Relative to those items:
 - a. Please describe how NESCOE arrived at the proposed capacity levels for the Maine-New Hampshire interface and the Surowiec-South interface and whether NESCOE considered the New England Clean Energy Connect project in making its determination.
 - b. Consideration (3) relates to a requirement that any solution “facilitate” the interconnection of new capacity. What does NESCOE understand “facilitate” to mean in this context?
 - c. Considerations (3) and (4) appear to be seeking somewhat similar information. Please describe how NESCOE understands the differences between these considerations.
5. Page 3 of the letter describes NESCOE’s intent that any RFP help facilitate development and integration of “additional affordable generation sources.” Please describe what “affordable” means in this context and how ratepayer interests would be included in any determination of affordability.
6. Please explain whether and how NESCOE considered the recent Department of Energy award of Grid Innovation Program funding for the “Power Up New England” portfolio of projects in determining to prioritize the North-South interface for its first LTTP RFP.
7. In finalizing the scope and specific needs of the RFP, please state whether and how NESCOE and the ISO did or will consider any impacts of:
 - a. The ISO’s 2050 Transmission Study Additional Analysis on Offshore Wind Relocation and Screening;
 - b. The New England Clean Energy Connect project;
 - c. Updated Maine Interface Transfer Limits; and / or
 - d. Ongoing ISO planning processes, such as the Boston 2033 Needs Assessment and Solutions Study.
8. On page 2, NESCOE notes that “[t]he minimum values proposed here balance the objectives of strengthening the connection between northern and southern New England and facilitating the integration and deliverability of additional affordable generation resources with the recognition that significant increases to the Maine-New Hampshire and Surowiec-South interfaces may require additional investments on downstream

interfaces.” How do NESCOE and the ISO intend to handle this issue in the RFP and bid evaluation process?

The Consumer Advocates appreciate the opportunity to offer these comments and questions on the LTTP process and RFP proposal and look forward to working constructively with NESCOE, the ISO, and other stakeholders as the region pursues cost-effective projects for the benefit of the region.