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LS Power Grid Northeast, LLC ("LS Power") submits the following comments regarding the New England States Committee on Electricity (NESCOE) letter issued October 16, 2024 on the Potential Transmission Need for a Longer-term Transmission Planning RFP and later discussed at the October 23, 2024 Planning Advisory Committee (PAC) meeting.

LS Power supports NESCOE's proposal to initiate the Longer-Term Transmission Planning ("LTTP") process for a Request for Proposals ("RFP"). It is important as NESCOE stated throughout the meeting that this RFP be structured in a non-prescriptive, needs focused manner. This will allow for greater range of creative, competitive solutions to be submitted by developers.

#### **Process Timing**

Given that this is the first application of the LTTP, the goal should be to complete the process as efficiently as possible, in order to apply lessons learned to future LTTP RFPs. Experience in other regions shows that the process could be completed more quickly than identified. At the October 23, 2024 PAC, the discussion was for a 6-month solicitation window for developers to submit proposals followed by a yearlong evaluation. LS Power believes a shorter submission window, such as a 60–90-day period still provides developers sufficient time to put together detailed proposals. For example, the recent PJM competitive planning process<sup>1</sup> for the 2024 RTEP window 1 was a 60-day window, opening on July 15, 2024 and closing on September 17, 2024. Within this 60-day window PJM received 94 total proposals submitted from 16 different entities.<sup>2</sup> In addition, the proposed evaluation period of one year could also be reduced. PJM estimates selection and approval of a project in February 2025, approximately five months after submittal. A shorter window and evaluation process will give NESCOE an opportunity to utilize the LTTP process more frequently, which will help meet the needs outlined in the 2050 Transmission Study. LS Power recommends NESCOE reduced the application window to 60-90 days and target an evaluation period of 6 months.

#### **Corollary Upgrades**

LS Power wants to ensure that ISO-NE and NESCOE have the flexibility to choose the most cost-effective solutions as part of the LTTP RFP.

LS Power has heard stakeholders express concern that the ISO-NE tariff could be interpreted to limit the ability for non-incumbents to propose full solutions. More specifically, some have suggested that ISONE OATT Attachment K Section 16.4 could be read as suggesting only incumbent transmission owners will be permitted to

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<sup>1</sup>Reliability Analysis Update presentation 11/06/24 TEAC, Slide 4. <https://www.pjm.com/committees-and-groups/committees/teac>

<sup>2</sup>Reliability Analysis Update presentation 11/06/24 TEAC, Slide 7. <https://www.pjm.com/committees-and-groups/committees/teac>



submit proposals that include certain upgrades that require reconductoring an existing facility, or work within an existing utility's right-of-way.

Previously a narrow reading of this provision was highlighted as a shortcoming of the Boston Needs 2028 RFP.<sup>3</sup> Were this provision read similarly in the LTTP process, it could result in a non-incumbent developer's project being disqualified from the process *prior to the evaluation phase* – that is, without ever being seen or evaluated on its merits. This would likely restrict a non-incumbent developer from being selected in the LTTP process, even if they have a more cost-effective proposal, contrary to NESCOE's goal of having a robust and competitive RFP process.<sup>4</sup>

To avoid this pitfall, the LTTP RFP should include language that clarifies that Section 16.4 enables non-incumbent developers to propose full solutions that include upgrades or facilities within incumbent ROWs, without requiring an agreement with the incumbent utility. Such upgrades or facilities could be owned by the incumbent utility, jointly owned, or owned by the bidder, subject to state law of the specific jurisdiction. This clarification would allow developers include all aspects of a project in their proposals and will give ISO-NE and NESCOE a broader range of potential solutions. The RFP could specify whether any corollary upgrades should be included either in a bidder's proposal or as identified by ISO-NE in the evaluation process.

## **Conclusion**

LS Power appreciates the opportunity to provide feedback in in the LTTP process. We believe by including the suggested comments above the RFP and LTTP process will result in more robust, cost-effective solutions for the region.

Sincerely,

Tim Lundin  
Transmission Regulatory Policy Manager

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<sup>3</sup> Modified reliability and market solutions tariff under section 4.3 of Attachment K as a result of the Boston 2028 lessons learned.

<sup>4</sup> ISONE OATT Section 16.4