

November 22, 2024

New England States Committee on Electricity
424 Maine Street
Osterville, MA 02655

RE: National Grid's Response to NESCOE's Potential Transmission Needs for a Longer-term Transmission Planning RFP Letter

National Grid submits these comments in response to NESCOE's Potential Transmission Needs for a Longer-term Transmission Planning RFP letter to ISO-NE on October 16, 2024, and its request for stakeholder feedback.

National Grid commends NESCOE for utilizing the newly approved Longer-Term Transmission Planning (LTTP) process to advance transmission development in New England and appreciates the opportunity to comment. As addressed below, National Grid supports the identification of a need to integrate renewables from Maine and northern New England into load demand centers in southern parts of New England and encourages NESCOE and ISO-NE to provide further detail on how proposals will be evaluated to allow participants to design the most effective solutions for New England customers.

Identified Need

National Grid agrees that interface constraints restrict flow of power from northern New England to southern parts of New England, posing a challenge for integrating renewable energy from Maine to serve load in and around Boston. ISO-NE's 2050 Transmission Study identified overloads on the Maine-New Hampshire, North-South, and Boston Import interfaces as high likelihood needs that exist through 2050, making this corridor an appealing candidate for the LTTP process. If NESCOE defines the LTTP need with increased interface limits, National Grid recommends defining the need as a problem statement that will allow participants to consider and submit more innovative solutions, creating the greatest value for New England customers. For example, if NESCOE's primary goal is to increase deliverability of renewable resources to Greater Boston load centers, National Grid recommends that it define the RFP with such a goal, encouraging participants to most effectively address the need.

Evaluation Criteria and Proposal Evaluation

ISO-NE's Tariff Attachment K details evaluation criteria that will be used to evaluate proposals and identify the preferred Longer-Term Transmission Solution. National Grid recommends that NESCOE and ISO-NE consider evaluation criteria when defining the need and adjust the evaluation criteria if needed after a final need has been defined, to ensure proposals are evaluated on achieving the core goal of the solicitation. National Grid recommends that NESCOE make known to ISO-NE and participants what it values in a solution, providing a suggested weighting of how these criteria should be valued. National Grid encourages ISO-NE to adopt and make known a relative weighting of evaluation criteria. Such clarity will ensure alignment across all parties and will help participants propose solutions focused on the criteria or benefits that matter most to New England states and ratepayers. As NESCOE and ISO-NE consider the relative

significance of different criteria, National Grid encourages both entities to focus on value for New England customers and specifically suggests the use of a \$/MW of renewable energy deliverability metric to evaluate the cost effectiveness of different sized proposals.

Additional information on how ISO-NE will evaluate proposals is needed for participants to develop thorough and effective solution proposals. National Grid encourages NESCOE to wait to initiate the request for proposals (RFP) until participants are provided clarity on the following topics:

1. Base case and any sensitivities to be used by ISO-NE to evaluate proposals
2. How and when ISO-NE will address contingency issues and recalibrate interface limits for an HVDC solution if the RFP is defined by interface limit increases

In conclusion, National Grid supports NESCOE's proposed solicitation and the effort to further develop the New England transmission system to accommodate greater renewable energy deliverability. National Grid recommends that NESCOE define the need to focus on renewable energy deliverability rather than interface limits to give participants greater flexibility in solution development and provide customers with the optimal solution. National Grid also encourages NESCOE and ISO-NE to be as transparent as possible about how evaluation criteria will be weighted and how proposals will be studied to allow participants to design solutions that best meet New England's needs. National Grid appreciates NESCOE's effort on the scope of this solicitation and engagement with stakeholders.

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