



**To:** New England States Committee on Electricity  
**Cc:** Al McBride, VP of System Planning, ISO New England  
**From:** Alex Lawton, Senior Principal, Advanced Energy United  
**Date:** 11/22/2024  
**Re:** Input on Transmission Needs for LTTP RFP

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Advanced Energy United (“United”) is pleased to share the following input in response to NESCOE’s letter to ISO-NE and request for stakeholder input on transmission needs for a Request for Proposal (“RFP”) under Longer-Term Transmission Planning (“LTTP”). United has been an ardent supporter of NESCOE’s 2020 vision statement and a staunch advocate for more holistic, forward-looking transmission planning that can build the New England grid of the future.<sup>1</sup> Through issuing this letter and request for input on transmission needs, the New England states, through NESCOE, have taken a critical step in delivering grid solutions that will result in least-cost, reliable, clean electricity.

Issuing an RFP, selecting a winner through a competitive process, and catalyzing construction, however, remain the endgame for this process given the exigent need for enhanced transmission capabilities. Unlocking the clean energy generation potential in Northern Maine through a competitive procurement will allow states to fulfill their energy and climate requirements while ensuring electric reliability and affordability. Hence, the region relies on a successful procurement through the LTTP process that translates to the actual construction of transmission infrastructure upgrades and a consensus-driven equitable distribution of costs that reflect the regional benefits transmission will deliver. The New England states can best ensure the likelihood of a successful solicitation by formally advancing this list of identified transmission needs for the ISO to issue a procurement by the March RFP issuance timeline NESCOE alluded to at the October 23<sup>rd</sup> Planning Advisory Committee (“PAC”) meeting.

United appreciates NESCOE’s deliberate, collaborative approach to defining transmission needs in a manner that is specific enough to address needs identified in the 2050 Transmission Study without precluding cost-effective solutions unnecessarily through overly prescriptive requirements. The desire to strike a balance on the specificity of requirements for transmission solution proposals must be weighed against preventing any unnecessary delays. Above all, we urge the states, through NESCOE working with ISO-NE, to explicitly commit to

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<sup>1</sup> Comments of Advanced Energy United (then known as “Advanced Energy Economy”) in Docket No. ER22-727- 000; Comments of Advanced Energy United in support of Longer-Term Transmission Planning Process Phase 2 in Docket No. ER24-1978-000.

releasing this RFP forward by March of 2025. This timeline balances expediency with meaningful process through the PAC. A March deadline affords stakeholders ample opportunity to offer meaningful input and for that feedback to be considered and incorporated if needed, for NESCOE to consult ISO-NE on any technical considerations as NESCOE finalizes its list of transmission needs, and for the ISO to prepare and issue the RFP accordingly.

Looking forward along in the process, we note that the year review stage between ISO-NE receiving proposals and selecting a winner is a long period of time for QTPSs to hold firm their bids and adds significant time to the overall schedule. We urge ISO-NE to strive to complete their review as expediently as possible and ideally in under the designated one year. In subsequent RFPs, it would be appropriate to reassess the fit of the review timeframe once the ISO has more experience with the process.

### **North-South Transmission Needs**

United supports NESCOE's preliminary list of transmission needs identified in its letter to ISO-NE focusing on strengthening north-south interfaces starting between Maine and New Hampshire and down into southern New England. Multiple studies and analyses have documented the abundant renewable resource potential found and seeking to interconnect in northern Maine.<sup>2</sup> The findings of the 2050 study further corroborate that Northern Maine is energy resource rich yet restricted in its power transfer capability. As New England seeks to bolster its regional energy security and adequacy, Northern Maine is a particularly promising area for development given the region's strong renewable energy potential and land availability. Throughout much of southern New England, development is hampered by challenges facing the siting of new energy infrastructure. Furthermore, it lies within the ISO-NE region, and thus its resource potential is not directly impacted by imports or restricted by interregional transfer limits and provides important economic development and energy security benefits to our region. Energy and capacity resources located within the region are increasingly important given how some imports have begun to waiver during critical reliability events in recent years.<sup>3</sup> Increased capacity from northern New England will help the region position itself for anticipated load growth and help ensure reliability.

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<sup>2</sup> *Final Second Maine Resource Integration Study*, ISO New England Inc. (October 30, 2020), at page 6. Available at: <https://www.iso-ne.com/static-assets/documents/2021/01/second-maine-resource-integration-study-report-non-ceii-final.pdf>; *Maine Renewable Energy Market Assessment*, Maine Governor's Energy Office (February 17, 2021), slide 26. Available at: [https://www1.maine.gov/energy/sites/maine.gov.energy/files/inline-files/GEO\\_Maine\\_Renewable\\_Energy\\_Goals\\_Market\\_Assessment\\_February\\_Webinar\\_Slides.pdf](https://www1.maine.gov/energy/sites/maine.gov.energy/files/inline-files/GEO_Maine_Renewable_Energy_Goals_Market_Assessment_February_Webinar_Slides.pdf)

<sup>3</sup> *Letter from Gordon van Welie to New England Senators concerning Winter Storm Elliott*, ISO New England (February 10, 2023), at page 3. Available at: [https://www.iso-ne.com/static-assets/documents/2023/02/combined\\_storm\\_elliott\\_op4\\_letters.pdf](https://www.iso-ne.com/static-assets/documents/2023/02/combined_storm_elliott_op4_letters.pdf)



## Enhancing Competition

Prioritizing competition in the procurement process helps ensure ratepayers get the most cost-effective transmission solutions, incumbents don't receive unfair advantages, and participation and collaboration is prioritized. The best way to enhance competition is to maximize the ability of Qualified Transmission Project Sponsors (QTPSs) to participate and propose solutions.<sup>4</sup>

United commends NESCOE's commitment and stated intent to maximize competition for a forthcoming RFP and identifies four ways in which competition can be enhanced under LTTP.

First, we recommend softening requirements for non-incumbent QTPSs to leverage right-of-ways and install equipment necessary implementing proposed solutions can. The tariff prohibits non-incumbent QTPSs from identifying or installing new equipment needed for upgrades on existing lines without partnering with the incumbent transmission owner. This will be a common occurrence given the results of the 2050 Transmission Study found that much of the incremental transmission capacity we need in the region by 2050 will be most cost-effectively addressed through upgrades to existing lines.<sup>5</sup>

Second, LTTP favors incumbent transmission owners through a requirement for bids to identify non-PTF upgrades. Determining non-PTF upgrades cannot be done without close coordination and significant assistance from the incumbent transmission owner and goodwill aside, there is no incentive for the transmission owner to help. A solution that ensures good faith collaboration between the incumbent and the QTPS or softens this requirement can improve competition by leveling the playing field.

Third, competition can be enhanced by removing the prohibition on submitting partial solutions. Under the tariff, QTPSs are required to submit complete solutions sets in response to an RFP, meaning QTPSs are barred from submitting proposals that solve only part of a needs set within an RFP. This design precludes multiple QTPSs from addressing a solution set together in a least-cost manner should one QTPS be able to solve a subset of needs more cost-effectively.

Finally, defining transmission needs broadly is the most suitable approach for enhancing competition under this RFP since it leaves room for Qualified Transmission Project Sponsors to propose creative solutions, offer additional upgrades beyond the minimum requirements where efficiencies or opportunities may be gained, and overall encourages more participation.

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<sup>4</sup> See Comments of Advanced Energy United in support of Longer-Term Transmission Planning Process Phase 2 in Docket No. ER24-1978-000, at page 9-11.

<sup>5</sup> *2050 Transmission Study, ISO New England Inc. Transmission Planning* (February 12, 2024), at 18.

[https://www.iso-ne.com/static-assets/documents/100008/2024\\_02\\_14\\_pac\\_2050\\_transmission\\_study\\_final.pdf](https://www.iso-ne.com/static-assets/documents/100008/2024_02_14_pac_2050_transmission_study_final.pdf)



While there are tradeoffs to breaking up transmission needs across multiple RFPs (discussed below), multiple RFPs may at least foster improved competition by allowing more robust bidding and participation given the prohibition on submitting partial solutions is likely to be effective for the first RFP.

### **One Versus Multiple RFPs**

United would not be supportive of splitting the solicitation into separate RFPs if doing so in any way slows down the overall process and impairs the probability of a successful procurement. Although we are not necessarily opposed to it, especially if the transmission needs under the forthcoming RFP err on the prescriptive side, we urge caution and defer to the ISO and NESCOE on the matter. We are cognizant of the resource constraints ISO-NE faces already in administering LTTP in addition to looming projects such as Order 1920 compliance. Breaking up solicitations into multiple RFPs in subsequent transmission need identifications may be most efficient when the ISO has more experience with the process and has sufficient staff hired and up to speed to support LTTP. For this first solicitation, however, we caution any measure that may complicate the process or stretch staff bandwidth thin. Ultimately, we defer to the ISO's and NESCOE's judgement on whether breaking the solicitation up may distract or further challenge ISO staff bandwidth or risk delays for a procurement, but United reinforces the notion that time is of the essence and that this process should move forward without delay.

