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|  | Planning Advisory Committee |
|  | Michael I. Henderson and Carissa P. Sedlacek |
|  | July 8, 2019 |
|  | RSP19 Comment Submittal |

ISO New England, Inc. (the ISO) has posted the draft 2019 Regional System Plan (RSP19) for review by interested stakeholders, especially the Planning Advisory Committee (PAC). Comments to RSP19 may be submitted to the ISO in writing via email to [pacmatters@iso-ne.com](mailto:pacmatters@iso-ne.com) no later than **July 24, 2019.** The attached form should be used to submit comments, and directions are listed below.

**Directions**

* Comments must be relevant to information previously presented to PAC and not introduce new scopes of work
  + ISO and PAC have discussed the scope of work and draft study results summarized in the report
  + The report is approximately 180 content pages and provides references to detailed information
* Please focus ***comments on the substance*** of the report
  + ISO’s Technical Editor will reflect comments in the report as appropriate to avoid repetition, etc.
  + The final report will be fully copy edited, contain revised footnotes with live links, and will reflect updates to items marked in yellow within the report
* Original comments will be publicly posted on the ISO website and as such should not discuss CEII materials. Although RSP does not discuss CEII materials, it does include links to CEII protected materials for those interested in more details.
* Those wishing to submit comments must submit them to [pacmatters@iso-ne.com](mailto:pacmatters@iso-ne.com) using the ***form*** attached to this memo
  + Please indicate the pages and section numbers
  + Individual comments pertaining to each page of the RSP should be entered separately into the form
  + Redlined comments to the draft RSP19 are acceptable, but need to appear in the appropriate column of the form for consideration
  + Do not send comments in PDF format

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| **RSP19 Comment Form** | | | | |
| **Page Number** | **RSP Section** | **Commenter (Name/Organization)** | **Comment** | **Initial ISO Response** |
| 117 | 7.3.1 | John Moskal, US EPA | Figure 7-3 still has Neptune LNG offshore terminal. That was decommissioned. Remove the reference and it will be consistent with the text on p. 116 which only lists the Northeast Gateway terminal. |  |
| 81 | 5.5.1 | John Moskal, US EPA | 2022 Needs Assessment was published in June 2014 not “2104” |  |
| 137 | 8.1.2 | Bob McConnell, US EPA | We suggest that the word “will” be changed to “may” in the following sentence, as it isn’t necessarily the case that Connecticut’s revised ozone nonattainment classification of serious would bring about additional control requirements for electric generators in the state: “EPA has proposed downgrading Connecticut from moderate to serious nonattainment with the 2008 ozone standard, which, if finalized, may ~~will~~ trigger additional control requirements for in-state fossil power generators.” |  |
| 138 | 8.1.2 | Bob McConnell, US EPA | In Table 2, for the “major provisions” entry for the CSAPR, we suggest adding the following sentence to the ending: “Although none of the New England States are required to reduce their emissions pursuant to phase 2 of CSAPR, the region will benefit from the emission reductions required of upwind states.” |  |
| 139 | 8.1.2 | Bob McConnell, US EPA | The first sentence at the top of page 139 references to footnote 281; since the sentence speaks of the ozone NAAQS, it appears the proper footnote should be to 280, not 281. |  |
| 125 | 7.5.2.1 | John Moskal, US EPA | Discussion around increased use of oil only mentions greater greenhouse gas emissions. Greater oil use also results in increases in NOx and SO2 emissions. |  |
| 153 | 8.8 | John Moskal, US EPA | I would consider adding a discussion item on the potential impact of declining state GHG caps (as discussed in Fig 8-4) on the potential for investment or disinvestment in fossil units in selected states and resultant impact on system……. |  |
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