|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **RSP19 Comment Form** | | | | |
| **Page Number** | **RSP Section** | **Commenter (Name/Organization)** | **Comment** | **Initial ISO Response** |
| 1 | 1 | NESCOE | “Transmission improvements are needed to enhance the reliability ~~and economic performance~~ of the regional power system and support state policies to access remotely located sources of clean energy. Transmission plans are in place throughout the region to meet system needs.” **There are currently no transmission improvements identified as needed for economic performance. If there are, this should note the source document.** |  |
| 1 | 1 | NESCOE | “New England is currently fuel constrained, which remains the greatest reliability risk to the region.” **ISO-NE should define “fuel constrained” here and provide a source to ISO-NE’s determination as to fuel constraints being the greatest reliability risk to the New England power system.** |  |
| 2 | 1 | NESCOE | ‘Additional potential measures include, firm contracts with gas suppliers to improve gas availability for power generation,…” **Which committee is discussing this potential measure?** |  |
| 4 | 1.1.2 | NESCOE | “To date, resource-adequacy studies have shown that the most ~~reliable and~~ economic place for developing new resources is in the Northeastern Massachusetts (NEMA)/Boston and Southeastern Massachusetts/ Rhode Island (SEMA/RI) areas.” **ISO should explain what it means when it says that one location is more reliable for interconnection than another or delete the term. Does this mean this location needs less upgrades than others – that would be economics.** |  |
| 5 | 1.1.2 | NESCOE | “RSP19 conducted operable-capacity analyses using projected systemwide demand forecasts and projected systemwide ICR values.” **ISO conducted the analysis (not RSP19).** |  |
| 5 | 1.1.2 | NESCOE | “Continuing to ~~properly~~ locate and size ~~economical~~ resources within major load pockets to replace resource retirements would decrease the amount of reserves required within load pockets and reduce the reliance on transmission facilities.” |  |
| 11 | 1.1.5.3 | NESCOE | “Also, although National Grid has proposed a 1 Bcf LNG facility in Providence, Rhode Island for gas distribution company peak shaving, this improvement is not anticipated to directly benefit New England generators.” **There is no explanation for this conclusion and no discussion of this in Section 7. The only mention appears to be in the executive summary.** |  |
| 18 | 1.1.8 | NESCOE | **Strike New England Governors Conference and replace with Coalition of Northeastern Governors** |  |
| 131 | 8 | NESCOE | “Various elements of the power system are subject to federal, regional, and state environmental laws and regulations controlling pollution, emissions, or discharges for protecting human health and the environment”  **Strike the word “regional”. There are no regional laws or regulations.** |  |
| 131 | 8 | NESCOE | However, to date, most national, regional, and individual state regulators have provided compliance options in several recent rulemakings and permitting decisions, recognizing the reliability value that low-capacity fossil steam generators (primarily oil-fired units) provide in maintaining energy security (see Section 7.2).” **Strike the word “regional”. There are no regional regulators.** |  |
| 153 | 8.8 | NESCOE | “Existing and pending federal, regional, and state environmental regulations may require generators to consider adding air pollution control devices; modifying or reducing water use and wastewater discharges; and, in some cases, limiting operations.”  **Strike the word “regional”. There are no regional regulations.** |  |
| 154 | 9 | NESCOE | “A longer-term strategy for decreasing overall carbon dioxide emissions calls for coupling the growth of renewable electric energy supplies with the electrification of the transportation and heating sectors.” **This should indicate whose strategy this is.** |  |
| 154 | 9.1.1 | NESCOE | “Additionally, the states are cooperating on promoting environmentally friendly policies and have committed to work together to ‘evaluate ~~regional~~market-based mechanisms that value the contribution that existing nuclear generation resources make to regional energy security and winter reliability.’ ~~to help maintain critical nuclear and clean energy facilities~~ (Section 10.1).” **To ensure accuracy, suggest revising this to quote from the source document rather than characterizing it.** |  |
| 154 | 9.1.1 | NESCOE | “The governors also reaffirmed their commitment to advancing a diverse regional energy supply and reduced carbon emissions through increased clean energy generation and energy-efficiency measures and cooperation with the neighboring Canadian provinces (see Section 10.1.4)”   **Same comment as above. Recommend quote from source document for accuracy.** |  |
| 172 | 10.1.3 | NESCOE | “The six New England governors are committed to diversifying the regional energy supply, promoting renewable resource development and energy efficiency, and reducing carbon dioxide and other greenhouse gas emissions."  **Same comment as above.** |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |