



May 6, 2021

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *Nextera Energy Seabrook, LLC*, Petition for Declaratory Order of NextEra Energy Seabrook, LLC; Docket No. EL21-3-___

NECEC Transmission LLC v. NextEra Energy Res., LLC, Amended Complaint and Request for Expedited Relief of NECEC Transmission LLC and Avangrid, Inc.; Docket No. EL21-6-___

Dear Secretary Bose:

ISO New England Inc. (“ISO-NE”)¹ offers this letter to express the importance of prompt resolution of the matters before the Federal Energy Regulatory Commission (“Commission”) in the above-referenced proceedings.² Based on the pleadings to date, prompt resolution is supported by the disputing parties – NECEC Transmission LLC/Avangrid, Inc. (collectively, “Interconnection Customer”) and NextEra Energy Seabrook, LLC (“Affected Party”). While ISO-NE writes to inform the Commission of the need for expeditious resolution of the issues, it does not take a position on the issues presented nor the specific proceeding in which they are addressed.

These proceedings relate to certain upgrades to the generator circuit breaker at the Affected Party’s Seabrook Station (“Affected System”) that are required for the safe and reliable interconnection of Interconnection Customer’s proposed Elective Transmission Upgrade, known as the New England Clean Energy Connect (the “Project”), to the ISO-NE-administered system. ISO-NE identified the need for the Affected System upgrades during the Interconnection Studies performed for the Project

¹Capitalized terms used but not otherwise defined in this filing letter have the meanings ascribed thereto in the ISO’s Transmission, Markets and Services Tariff (“Tariff”).

² See *NECEC Transmission LLC v. NextEra Energy Res., LLC*, NextEra Answer to Amended Complaint of NECEC Transmission LLC and Avangrid, Inc.; Docket No. EL21-6-000, p. 14 (Apr. 15, 2021) (“NextEra Answer” (continuing to support promote resolution of the matters in dispute); *NECEC Transmission LLC v. NextEra Energy Res., LLC*, Amended Complaint and Request for Expedited Relief of NECEC Transmission LLC and Avangrid, Inc., Docket No. EL21-6-000 (Mar. 26, 2021) (“Amended Complaint”) (requesting expedited relief).

pursuant to the Commission-accepted ETU Interconnection Procedures. Specifically, the Interconnection System Impact Study for the Project showed the duty on the Seabrook Station circuit breaker within its ratings until the addition of the Project, but over its ratings after the addition of the Project, which rendered Interconnection Customer responsible for the circuit breaker upgrade. In other words, the Seabrook Station circuit breaker upgrade was not required “but for” the interconnection of the Project. Interconnection Customer’s responsibility for this Affected System upgrade is memorialized in the fully-executed Interconnection Agreement for the Project,³ and is included as a requirement of the Project’s approval under Section I.3.9 of the Tariff.

In accordance with the Interconnection Procedures and Section I.3.9 of the Tariff, the Project and its corresponding upgrades must be included in the base case of all subsequent planning studies performed under the planning processes set forth in the Tariff. As relevant to these proceedings, the expected in-service date and the actual new equipment design for the Seabrook Station circuit breaker, as upgraded, are inputs into several subsequent interconnection and regional planning studies and therefore the information is required for those assessments. That information, however, is now pending resolution of the issues presented in these proceedings. Therefore, prompt resolution of these proceedings is needed to allow the planning processes associated with all subsequent projects to continue to move forward.

Please feel free to contact us if you have any questions on this matter.

Very truly yours,



Alan McBride
Director, Transmission Services
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³ For reference, see Elective Transmission Upgrade Interconnection Agreement by and among ISO New England Inc., NECEC Transmission LLC, and Central Maine Power Company, dated November 6, 2020, and designated as Original Service Agreement No. ETUIP-ISONE/CMP-20-01 under Schedule 25 of Section II of Tariff.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service lists compiled by the Secretary in these proceedings.

Dated at Holyoke, Massachusetts this 6th day of May, 2021.

/s/ Julie Horgan
Julie Horgan
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