

February 10, 2022

VIA ELECTRONIC FILING

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

Re: ISO New England Inc., Capital Budget Quarterly Filing for Fourth Quarter of 2021; Docket No. ER22-____-000

Dear Secretary Bose:

ISO New England Inc. (the “ISO” or “ISO-NE”) hereby submits, pursuant to Section 205 of the Federal Power Act (“FPA”), Part 35 of the Rules and Regulations of the Federal Energy Regulatory Commission (the “Commission”), and the provisions of Section IV.B.6.2 of the ISO New England Inc. Transmission, Markets and Services Tariff (the “Tariff”),¹ the ISO’s Capital Projects Report (the “Capital Projects Report”) and schedule of the unamortized costs of the ISO’s funded capital expenditures (the “Unamortized Costs Schedule”) for the quarter ending December 31, 2021 (collectively, the “Fourth Quarter 2021 Report”). The ISO respectfully requests that the Commission accept the Fourth Quarter 2021 Report as filed, effective January 1, 2022.

I. INTRODUCTION

Section IV.B.6.2 of the Tariff provides:

Consistent with the requirements imposed by the Commission in Docket No. ER02-2153, the ISO will file quarterly reports with the Commission specifying, by project, the ISO’s prior year spending on multi-year projects, year to date spending and a forecast of the next calendar year spending. In addition, the ISO will file a schedule of the unamortized costs of the ISO’s funded capital expenditures at the end of the quarter and the allocation of those costs to Schedules 1, 2, and 3. Such reports will be filed within forty-five (45) days at the end of each quarter and posted on the ISO’s website. All quarterly capital budget and expenditure filings will be filed pursuant to, and subject to Commission review under, Section 205 of the Federal Power Act.

The Capital Projects Report and the Unamortized Cost Schedule for the quarter ending December 31, 2021 are attached hereto. The Unamortized Cost Schedule sets forth the

¹ Capitalized terms used but not otherwise defined in this filing have the meanings ascribed thereto in the Tariff.

allocation of the costs to Schedules 1, 2, and 3 of Tariff Section IV.A, should such collection prove necessary.

II. DISCUSSION OF THE FOURTH QUARTER REPORT

The ISO's forecasted annual capital budget, accepted by the Commission for 2021 at \$28.0 million,² could not predict with perfect accuracy the exact manner in which the ISO would incur capital expenditures. The ISO's quarterly filings keep stakeholders and the Commission apprised of adjustments; accordingly, the Fourth Quarter 2021 Report provides actual capital expenditures incurred by the ISO through 2020 on multi-year capital projects, year-to-date spending during 2021, and forecasted future amounts for projects that extend beyond 2021.

Final capital expenditures for 2021 were \$27.5 million. Contributing to lower than expected 2021 spending was the Energy Security Improvements project, on hold due to the Commission's rejection of ISO-NE's proposal³ to address operational risks facing the region and a reduction for the deferral of the 2021 Cyber Security Improvements project. The Cyber Security Improvements project will refresh the hardware and software for systems that support the collection of network traffic data. Due to increased risks from ransomware and cyber attacks, this project was reprioritized to allow resources to address the more critical concerns. As a result, the Security Information and Event Management Log Monitoring Replacement project, to advance ISO-NE's ability to prevent, detect, and contain potential cyber events, was chartered in 2021 to mitigate increased cyber risks. Planning for the 2021 Cyber Security Improvements project, now referred to as Packet Broker Infrastructure Replacement Project, began late in 2021 and will be chartered in 2022. Additional reductions in 2021 included the CIP Electronic Security Perimeter Redesign project to improve CIP compliance of ISO-NE's electronic security perimeter networks, originally planned to begin in 2021, but was expedited into the fourth quarter of 2020, resulting in a shift in cost between years; planned funding for a second phase of the Data Governance, Risk Management & Compliance Software project, to expand software to assist the Enterprise Risk Management department's new quality assurance program, was returned to the Emerging Work Fund as the first phase of the project addressed nearly all of the end users' needs; and for the Human Resources Workflow project which was removed and funds returned to the Emerging Work Fund as this project was not ready to begin in 2021.

Increases from the original 2021 capital budget included the Security Information and Event Management Log Monitoring Infrastructure Replacement project (discussed above) that included replacement of both the hardware and software for the existing log-monitoring infrastructure. The new log-monitoring infrastructure will provide a more robust, industry standard log-monitoring product that will allow for the ability to prevent, detect, and contain potential cyber events. Increases also included continuing work on the long-term effort to transition to GE's market application suite, known as the Next Generation Markets (nGEM) program, and new initiatives not known at the time of the original budget. These initiatives include the Forward Capacity Market Qualification Enhancements project to address a number of enhancements identified for the qualification process of Import Capacity Resources, Demand

² See Commission letter order issued to ISO New England Inc. in Docket No. ER21-106-000 (December 18, 2020).

³ See Commission letter order issued to ISO New England Inc. in Docket No. ER20-1567-000 (October 30, 2020).

Resource Energy Efficiency, and Monthly Resource Qualifications; the Forward Capacity Market (“FCM”) Cost Allocation & Accelerated Billing project to provide enhancements to the current cost allocation methodology and the frequency of FCM billing to help reduce large Financial Assurance obligations and delay in payment to generators; and the Oracle 19c Upgrade project to change to the latest vendor supported software version for the Settlement Management System, Market Information Server, and the Forward Capacity Tracking System.

The following discussion highlights significant changes from the last quarterly report. Specifically, below, the ISO describes any (i) newly-chartered⁴ capital projects, (ii) projects completed during the quarter, and (iii) projects with significant budget changes compared with the last quarterly report. Finally, the discussion below includes a review of unchartered projects and non-project capital expenses.

The ISO vetted the changes discussed herein through the stakeholder process by posting a draft of this filing letter (with attachments) on its website on February 3, 2022. The ISO also discussed the contents of the filing letter and attachments at the February 10, 2022 meeting of the NEPOOL Budget & Finance Subcommittee.

A. New Projects with Approved Charters⁵

1. nGEM Hardware Phase II (\$4,570,000)

Significant infrastructure updates, including new technology for an open-source container platform, will be required to support the GE Next Generation Markets (nGEM) implementation program and other GE upgrades. The nGEM Hardware project (to be completed in two phases), is to complete the build out of environments early enough so the nGEM Market Clearing Engine (“MCE”) Implementation project schedule is not adversely impacted. The nGEM Hardware Phase I project provided the infrastructure required for the nGEM MCE Implementation project’s development environment.

The nGEM Hardware Phase II project will include outside expertise with the new open-source container platform, along with the necessary hardware and software required to build out the integration and production environments needed for the nGEM MCE Implementation project. These purchases include a suite of products and solutions that allow users the ability to build, run, and manage controlled container-based applications. In addition, a cloud-based cyber security package will be procured as part of this project to provide access control, advanced threat protection, user behavior monitoring, and other services for protection of enterprise applications and resources.

The targeted completion date for this project is November, 2022.⁶

⁴ All capital projects, prior to approval, must have a completed project charter. This charter documents the project’s goals and objectives, schedule and milestones, and budget. Before approving a new capital project, the ISO’s senior management team reviews each project charter.

⁵ Amounts shown in parentheses represent total project costs.

⁶ The capital projects that fall within the scope of the nGem software program will be put into production at the completion of all phases of the core product development. These projects include CIMNET Simultaneous Feasibility Test with Data Transfer Enhancements project, nGEM Value Added Development, nGEM Market

2. Forecast Enhancements (\$1,781,000)

ISO-NE provides regional weather forecasts for eight cities in the New England region. Currently, the weather concepts for each of these eight cities are weighted, using static weighting factors, to derive a representative regional weather forecast with a single value for each variable that represents the region. The Forecast Enhancements project will expand the number of weather forecasts to twenty-three cities and add two additional weather concepts to improve the forecast accuracy of the zonal and regional load forecast models. As load forecasting becomes more challenging and modeling tools are advancing, the load forecast process can benefit from more readily available information. In addition to improving the forecast accuracy of the zonal and regional models, more granular weather information will improve the visibility of diversified weather patterns that can greatly affect the magnitude and distribution of system demand.

In addition to the expansion of weather stations and weather information, this project will also implement a Behind-the-Meter Photovoltaic (“BTM PV”) forecast blending process, similar to the blending done with the final load forecast. This will require additional PV forecast vendors to augment the current process of incorporating the effects of BTM PV generation into operational time-frame load forecasting tools. In March 2019, the ISO implemented new tools to account for BTM PV production in the load forecast process. While this process has been successful, reliance on a single forecast from only one vendor when attempting to produce a reasonably accurate BTM PV forecast is subject to errors and biases. ISO-NE’s experience with load forecasting has shown that blended forecasts are, on average, more accurate than the individual contributions to that forecast.

The targeted completion date for this project is July, 2023.

3. Solar Do-Not-Exceed Dispatch Phase I (\$1,595,300)

The quantity of in-front-of-the-meter solar generation in the New England region is increasing and expected to continue to increase. Integration of solar resources will require development of rules, processes, forecasts, and tools necessary to incorporate these resources into the Do-Not-Exceed (“DNE”) dispatch processes. Phase I of this project will develop and implement enhancements to ISO-NE’s Renewable Plan (“RPlan”) software, developed by GE, and to allow Market Participants to submit their medium-term and long-term data for the availability of future power generation. Enhancements under the Solar DNE Dispatch Phase I project include RPlan software upgrades to support provisions for solar power forecasts and will enable the ability to receive forecasts for both wind and solar from multiple vendors. GE will design, develop, unit test, and integrate custom software enhancements, interfaces, and software tools to integrate solar resources into the DNE dispatch process.

Phase I will create the system platform to support the efficient dispatch of solar generation and its integration with the balance of the resource fleet, which can improve the economic efficiency of the system and can improve overall system reliability. Phase II of this

project will involve the integration of the updated RPlan software into integration and production systems at ISO-NE, and is anticipated to begin shortly after the completion of Phase I.

The targeted completion date for the Phase I project is December, 2022.

4. Physical Security Improvement Project (\$1,136,300)

The current camera security platforms at both the Main Control Center (“MCC”) and Backup Control Center (“BCC”) are obsolete, it is difficult to obtain replacement parts, and the system is costly to maintain.

Under the Physical Security Improvement Project, ISO-NE will partner with a technology company to deliver a next generation physical security system, providing enhanced video capabilities, cross-line analytics for real-time alerts of area breach and movement, and additional software monitoring and analytics. The existing security cameras will be replaced.

The targeted completion date for this project is September, 2022.

5. Replace Messaging Software (\$432,100)

ISO-NE’s current messaging software, used to pass Desired Dispatch Points from the Markets Database to the Communications Front End and to resources in the field, will be replaced with new messaging software.

In order to reduce cyber security vulnerabilities and maintain Electronic Dispatch capability, this messaging software must be replaced. This project will replace the existing software with messaging software currently in use on other ISO-NE systems. The replacement choice was based on a vendor assessment, desired functionality, and ISO-NE’s experience with the product. The project scope includes the purchase of new servers for multiple environments, design and configuration for the infrastructure and software architecture of the new servers on all environments, and required testing.

The targeted completion date for this project is November, 2022.

6. Asset Activation Automation (\$408,000)

Activating new generating assets in ISO-NE systems involves multiple business groups carrying out several manual processes in a timely fashion and takes multiple days. These processes are executed in a test environment before they are carried out in production environments.

The Asset Activation Automation project will provide enhancements including new data fields to be created in the Customer Asset and Management System (“CAMS”), modifications to existing data bridges to bring the new data field information into the Units Dispatch System and Control Room Operators Window (“CROW”) systems, and the build out of a new application programming interface to initiate new assets in CROW. With the frequency of asset activations expecting to increase as the industry moves toward smaller assets, automating the asset

activation process will reduce effort, allow for a timely response, and reduce the potential for human error.

The targeted completion date for this project is September, 2022.

7. Browser Standardization (\$472,000)

Currently the ISO information technology staff supports four different browsers. The use of four browsers requires support and development teams to try to ensure that all of the browsers are up-to-date to meet security concerns and that all ISO system web sites are functional in all four browsers. Additionally, one of the browsers the ISO currently uses is Internet Explorer. Internet Explorer will no longer be vendor supported as of June 15, 2022. In an effort to streamline browser use, the ISO will be removing two (Internet Explorer and Firefox) of the four browsers currently in use from all devices. The Chrome and Edge browsers will become the browsers of choice for the ISO. The project scope will include analyzing the ISO's suite of applications to determine how applications will be impacted by the removal of the two browsers; assessing applications' compatibility with the Chrome and Edge browsers, including consultation with the Original Equipment Manufacturers of critical applications; and implementing necessary changes for uninterrupted use of these systems.

The targeted completion date for this project is June, 2022.

8. Linear State Estimator Phase I (\$362,000)

ISO-NE currently uses a GE Phasor Measurement Unit ("PMU") based Linear State Estimator ("LSE") algorithm which utilizes time-synchronized phasor measurements in conjunction with the ISO-NE network model to estimate the power system state for the PMU-observable region of the network. The ability to provide real-time LSE functionality is part of GE's Wide Area Monitoring System product roadmap plan. The Linear State Estimator Phase I project will provide a proof-of-concept to assess LSE solutions as alternative situational awareness, and as a real-time synchrophasor-based backup system for grid control.

The Linear State Estimator Phase I project will deploy GE's real-time LSE into a development environment and connect appropriate data sources in order to evaluate the product for future use at ISO-NE. This Phase I proof of concept will include the internal labor and GE software required to deploy the GE real-time LSE product into the ISO-NE development environment, as well as the deployment of data bridges between various systems. If the proof of concept is successful, ISO-NE will charter Phase II of this project.

The targeted completion date for this project is June, 2022.

9. Short-Term Load Forecast Curve Modification Enhancement (\$279,600)

ISO-NE's system operators use the Short-Term Load Forecast ("STLF") module of the Energy Management System to ensure reliable dispatch of the real-time market. Currently, the STLF operator must repeatedly make updates to the STLF to reflect small differences throughout the operating day; the current process to make these updates is cumbersome and time consuming.

The STLF Curve Modification Enhancement project will provide an improved user interface to allow for these changes and reduce the opportunity for manual data entry errors. A new graphical user interface will allow system operators to modify the STLF similar-day historical traces and graphically adjust STLF overrides with ease and efficiency.

The STLF Curve Modification Enhancement project will simplify the operator's interaction with the STLF functionality in the Energy Management System by streamlining data entry, improve visualization, and reducing the chance for data input errors. An enhanced user interface will also increase situational awareness achieved through graphical representation of the STLF.

The targeted completion date for this project is June, 2022.

10. Forward Capacity Market Delayed Commercial Resource Treatment Phase II (\$253,000)

Under the original Forward Capacity Market Delayed Commercial Resource Treatment project, the ISO implemented a set of changes effective with the tenth Capacity Commitment Period ("CCP") that started on June 1, 2019, to improve incentives for a participant with a delayed project to take appropriate action to cover the resource's Capacity Supply Obligation ("CSO"). A resource that is unable to demonstrate its full CSO quantity is subject to a failure to cover charge for undemonstrated quantity.

Phase II of the Forward Capacity Market Delayed Commercial Resource Treatment project will implement the required change in calculation of the failure to cover charge rate, effective for CCP 13 (June 1, 2022). The modified failure to cover charge rate will be in compliance with Market Rule section III.13.3.4(b), providing additional incentive for a participant with a delayed project to take appropriate action to cover the resource's CSO.

The targeted completion date for this project is March, 2022.

11. Energy Management System Communications Monitoring (\$235,200)

Standard security tools (e.g., antivirus, intrusion detection systems, etc.) are insufficient to identify attacks within the communication protocols of operational technology systems such as Inter-Control Communications Protocol, Electronic Dispatch, Voice Communications, and Facility Control Subsystems. The Energy Management System Communications Monitoring project will purchase the necessary hardware and software to allow for enhanced monitoring of communication systems within the Operations area and allow for earlier identification of anomalies and cyber threats to these systems. This new system, which will specialize in detection that looks for anomalies in industrial control systems and operational technology, is a cyber threat intelligence system that provides actionable threat actor tactics and techniques for network defense, and is highly rated in the threat intelligence industry.

The targeted completion date for this project is April, 2022.

B. Capital Projects Completed in Current Quarter

1. Enterprise Application Integration Phase II

The Enterprise Application Integration (“EAI”) Phase II project was placed into service in December, 2021 at a total cost of \$1,082,200, \$124,200 higher than planned costs of \$958,000. The EAI project was a multi-phase project to transition to the new EAI messaging infrastructure, including the conversion of orchestration services (e.g., integrating two or more applications together) and adaptors (e.g., allowing one application to talk to another). The scope of the EAI Phase II project was revised to include a portion of the 2022 planned work for Phase III, which was to continue the conversion of application servers, not addressed in previous phases, to the new vendor supported version. The ISO was able to capitalize on available resources and utilize a small portion of the Emerging Work Fund, to complete the added scope. Currently no additional EAI work is expected for 2022 after the completion of Phase II.

2. Integrated Market Simulator Phase I

The Integrated Market Simulator (“IMS”) Phase I project was placed into service in December, 2021 at a total cost of \$981,500, \$527,700 less than planned costs of \$1,509,200 reported in the Third Quarter 2021 Report. This project was part of the multi-year effort to develop a new market simulation tool for evaluating operational and economic impacts of specific market or system changes in the energy and ancillary services markets. The planned scope was broken down into an additional phase with estimated costs of \$500,000, accounting for the variance. Phase I development of the IMS tool was limited to emulating outcomes of the day-ahead market only, and without full topological modeling. Therefore, it was determined that IMS development work would continue, into a Phase II project that will attempt to expand the day-ahead market modeling capabilities and develop the necessary enhancements to simulate the sub-hourly market and operations. Phase II is scheduled to begin in the first quarter of 2022.

3. 2021 Issue Resolution Project

The 2021 Issue Resolution Project was placed into service in November, 2021 at a total cost of \$934,200, \$93,800 less than planned costs of \$1,028,000, representing the balance of unused contingency funds.

4. nGEM Hardware Phase I

The nGEM Hardware Phase I project was placed into service in November, 2021 at a total cost of \$753,000, \$119,900 less than planned costs of \$872,900. Savings included less internal resources needed to complete the development environment and unused contingency funds.

5. Wireless Infrastructure Upgrade

The Wireless Infrastructure Upgrade project was placed into service in October, 2021 at a total cost of \$555,300, on target with planned costs of \$563,900.

6. Communications Front End EMP 3.2 Upgrade

The Communications Front End Energy Management Platform 3.2 Upgrade project was placed into service in December, 2021 at a total cost of \$377,300, \$23,800 less than planned costs of \$401,100, representing the balance of unused contingency funds.

7. FERC Forms 1, 3-Q and 714

The FERC Forms 1, 3-Q and 714 project was placed into service in November, 2021 at a total cost of \$100,200, on target with planned costs of \$102,800.

C. Projects with Significant Changes

1. Replacement of Locational Margin Prices Monitor (2022 budget increase of \$265,000 for a total project cost of \$649,000)

The Replacement of Locational Margin Prices Monitor (“LMP”) project, to implement a new LMP monitor built on a more modern, supportable, and maintainable platform, increased by \$265,000. This increase relates to changes from the original architectural approach, which was not consistent with existing architecture that required coding changes not in the original project scope.

D. Capital Projects in Planning/Conceptual Design

Capital project priorities in the planning and conceptual design phase are fluid. The Capital Projects Report includes ISO-NE’s current best estimate as to how it will spend capital funds. The estimates for projects in Planning/Conceptual Design are high level/low confidence. When the project scope, timeline, budget, and benefits are determined, these figures will be updated and communicated to stakeholders and the Commission through future quarterly reports. When final project scope is determined and planned funding is less, any difference will be returned to the Emerging Work Fund. Conversely, if the project is found to need additional funds they will be provided through the Emerging Work Fund.

Projects in planning that have had significant changes from the original 2022 budget include the removal of \$1.5 million for the Minimum Offer Price Rule project as the design/solution that was put forth to address the objectives for removing the barriers to the clearing of state sponsored resources in the Forward Capacity Market does not require any major software changes. Funds of \$500,000 allocated for the Enterprise Application Integration Phase III project were also removed from the 2022 capital budget, as discussed in Section B.1 above. Additionally, two other projects, not anticipated to begin in 2022 due to current resource constraints because of other higher priority projects, have been removed from the original 2022 capital budget. These projects are the Critical Infrastructure Protection (“CIP”) Electronic Security Perimeter Redesign Phase II project, with budgeted funds of \$1.0 million, to continue the effort to redesign ISO-NE’s electronic security perimeter, and \$400,000 in planned funds for the External Website Migration to Cloud project to migrate the ISO-NE public website from internal servers to the cloud.

Other significant changes for projects in planning, from the original 2022 capital budget, include the Cyber Security Enhancements project, now known as the Packet Broker Infrastructure Replacement project, to refresh the hardware and software for systems that support the collection of network data. The Packet Broker Infrastructure Replacement project is estimated with a total cost of \$1.0 million, a reduction of \$1.0 million from the original 2022 budget planned for the Cyber Security Enhancements project. With the level of activity planned for 2022, it is anticipated that only one phase of the Issue Resolution Project (“IRP”) will be done during 2022. Issue Resolution Projects are conducted annually in an effort to address specific System Improvement Requests for software enhancements. As a result, the 2022 IRP project has been reduced by \$750,000 from an original budget estimate of \$1.5 million. Estimated total costs for the Amazon Web Services Cloud Foundation project has been reduced by \$275,700, as the project scope is nearing completion and it is expected to be chartered in the first quarter of 2022. Additional changes include an increase for the nGEM Real-Time Market Clearing Engine Implementation project (not included in the original 2022 Budget) with planning dollars of \$495,000, as part of the larger effort underway to support the GE Next Generation Markets (nGEM) implementation program.

E. Non-Project Capital Expenses

Non-project capital expenditures fund the internal capitalized labor necessary to code System Improvement Requests, also known as “SIRs.” The SIRs are generally a result of requests from Market Participants and ISO-NE’s operational groups to improve system functionalities. Non-project capital expenditures also fund hardware, software, and furniture and fixture purchases.

ISO-NE’s non-project capital spending for 2021 was \$4,133,800, an increase of \$365,800 from amounts reported in the third quarter 2021 report. Increased spending in the fourth quarter related primarily to the purchase of new hardware and software. Purchases include a backup and recovery software solution to support ISO-NE’s transition to cloud-based storage; market monitoring and simulation software designed to streamline data exchange, keeping in line with new technology being proposed for the future grid; and an email security appliance for advanced phishing protection. This increased spending was partially offset by lower than budgeted expense to address System Improvement Requests, primarily due to resource constraints on higher priority projects.

III. ADDITIONAL SUPPORTING INFORMATION

The ISO submits the following additional information pursuant to Sections 205 of the FPA and 35.13 of the Code of Federal Regulations:

35.13(b)(1) – In addition to this transmittal letter, the ISO provides the following materials:

- for the Fourth Quarter ending December 31, 2021, the Capital Projects Report and the Unamortized Costs Schedule (Attachment 1); and

- a list of the governors and electric utility and other regulatory agencies for the six New England states that comprise the New England Control Area and the New England Conference of Public Utility Commissioners, Inc. (Attachment 2).

35.13(b)(2) – The ISO requests that the Commission accept the Fourth Quarter 2021 Report as filed, effective January 1, 2022. Since the information in the Fourth Quarter 2021 Report involves the period ending December 31, 2021, a waiver of the 60-day prior notice requirements is appropriate, as is the requested effective date. That effective date will also avoid any issue regarding a potential lag in the “backstopping” accomplished through the ISO’s capital budget quarterly reports.

35.13(b)(3) – An electronic copy of this filing is being provided to all NEPOOL Participants and to the governors and electric utility and other regulatory agencies for the six New England states that comprise the New England Control Area, and to the New England Conference of Public Utility Commissioners, Inc. The names and addresses of these governors and regulatory agencies are shown in Attachment 2. In accordance with Commission rules and practice, there is no need for entities identified on Attachment 2 to be included on the Commission’s official service list in the captioned docket unless such entities become interveners in this docket.

35.13(b)(4) – A description of the materials submitted pursuant to this filing is contained in this transmittal letter.

35.13(b)(5) – This transmittal letter and supporting materials provide a statement of the reasons the Fourth Quarter 2021 Report should be accepted by the Commission.

35.13(b)(6) – The ISO’s approval of these changes is evidenced by this filing. The ISO also notes that the NEPOOL Budget and Finance Subcommittee reviewed this filing and the 2021 Capital Budget, and the NEPOOL Participants Committee voted to support the 2021 Capital Budget.

35.13(b)(7) – The ISO does not have any knowledge of any relevant expenses or costs of service that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

35.13(c)(1) – Sales, services, and revenues cannot reasonably be projected at this time.

35.13(c)(2) – There is no other rate schedule on file for which a comparison of charges would be appropriate.

35.13(c)(3) – No specifically assignable facilities have been or will be installed or modified in order for the Commission to accept this filing.

IV. COMMUNICATIONS

Correspondence and communications regarding this filing should be addressed to:

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V. CONCLUSION

For the reasons stated herein, the ISO requests that the Commission accept the Fourth Quarter 2021 Report as filed, effective January 1, 2022.

Respectfully submitted,

/s Jennifer M. Recht
Jennifer M. Recht
Assistant General Counsel – Corporate
ISO New England Inc.

Attachment 1

ISO New England Inc.
Capital Projects Schedule
For the Quarter ended 12/31/21
(\$000's)

Description	Prior Year(s) Spending [1]	2021 Total Costs	2022 Cost to Complete	Future Year Costs to Complete	Total Project Costs [2]
Capital Projects - Approved Charters					
. nGEM Market Clearing Engine Implementation	3,177.6	4,855.9	4,612.3	1,254.7	13,900.5
. nGEM Software Development Part II	127.3	1,881.5	2,780.8	-	4,789.6
. nGEM Hardware Phase II	-	397.8	4,172.2	-	4,570.0
. Identity and Access Management Phase II	3,870.0	485.7	-	-	4,355.7
. Forward Capacity Tracking System Infrastructure Conversion Part III	-	197.2	2,952.8	-	3,150.0
. Security Info. & Event Mgt Log Monitoring Replacement	300.9	2,208.3	360.8	-	2,870.0
. Energy Management Platform 3.2 Upgrade Part II	2,503.4	30.7	-	-	2,534.1
. Forecast Enhancements	-	79.0	1,306.1	395.9	1,781.0
. Solar-Do-Not-Exceed Dispatch Phase I	-	316.4	1,250.8	28.1	1,595.3
. Internal Market Monitoring Data Analysis Phase III	17.0	558.5	920.5	-	1,496.0
. Forward Capacity Tracking System Infrastructure Conversion Part II	581.9	739.2	-	-	1,321.1
. Change Request System Replacement	1,279.5	19.0	-	-	1,298.5
. Physical Security Improvement Project	-	21.9	1,114.5	-	1,136.3
. Enterprise Application Integration Phase II	-	1,082.2	-	-	1,082.2
. Forward Capacity Market Cost Allocation & Accelerated Billing	-	729.2	335.8	-	1,065.0
. Forward Capacity Market Qualification Enhancements	229.3	806.8	17.9	-	1,054.0
. Integrated Market Simulator Phase I	131.9	849.6	-	-	981.5
. 2021 Issue Resolution Project	-	934.2	-	-	934.2
. Critical Infrastructure Protection Electronic Security Perimeter Redesign	766.3	148.5	-	-	914.8
. 2020 Corrective Action Preventative Actions	649.7	240.9	-	-	890.6
. Sub-accounts for Financial Transmission Rights Market	447.5	372.1	-	-	819.6
. E-mail List Server Technology Refresh	-	207.4	556.7	5.0	769.2
. nGEM Hardware Phase I	170.9	582.1	-	-	753.0
. TranSMART Technical Architecture Update	49.4	330.6	325.0	-	705.0
. Data Governance, Risk Management & Compliance Software Phase I	493.1	202.4	-	-	695.5
. Forward Capacity Market Nested Zones [3]	648.1	43.5	-	-	691.6
. Edge Network Redesign	634.1	19.6	-	-	653.7
. Oracle 19c Upgrade	-	610.2	42.8	-	653.0
. Replacement of Locational Margin Prices Monitor	-	249.4	399.5	-	649.0
. Enterprise Phone System Upgrade	311.2	310.7	-	-	622.0
. Wireless Infrastructure Upgrade	381.1	174.2	-	-	555.3
. Browser Standardization	-	260.0	212.0	-	472.0
. Replace Messaging Software	-	24.1	408.0	-	432.1
. Asset Activation Automation	-	54.7	353.3	-	408.0
. Ownership Transfer & External Registration	66.5	309.5	25.3	-	401.3
. Communications Front End EMP 3.2 Upgrade	175.5	201.8	-	-	377.3
. Generation Survey System	300.5	61.9	-	-	362.5
. Linear State Estimator Phase I	100.0	56.7	205.4	-	362.0
. Total Transfer Capability Calculator Redesign	-	141.2	211.8	-	353.0
. Time Entry System Upgrade	79.3	236.4	10.7	-	326.4
. Annual Maintenance Schedule Automation	140.0	145.3	-	-	285.3
. Short-term Load Forecast Curve Modification Enhancement	-	79.9	199.7	-	279.6
. Forward Capacity Market Delayed Commercial Resource Treatment Ph II	-	72.9	180.1	-	253.0
. Secure Lightweight Directory Access Protocol Channel Binding Adaption	-	237.4	13.5	-	250.8
. Energy Management System Communications Monitoring	-	188.4	46.8	-	235.2

ISO New England Inc.
Capital Projects Schedule
For the Quarter ended 12/31/21
(\$000's)

Description	Prior Year(s) Spending [1]	2021 Total Costs	2022 Cost to Complete	Future Year Costs to Complete	Total Project Costs [2]
. PI Historian for Short-term PMU Data Repository	78.6	107.0	45.7	-	231.3
. Learning Content Management System / Learning Management System Replacement	-	186.8	-	-	186.8
. Single Sign-on Hardware Replacement	-	169.6	17.0	-	186.6
. Market Information System File Transfer Protocol Refresh	-	147.9	4.5	-	152.4
. Behind-the-Meter Photovoltaic Web Publication	-	106.2	-	-	106.2
. FERC Forms 1, 3-Q and 714	44.7	55.5	-	-	100.2
. Projects Less Than \$100K in Value (One Project)	88.1	5.0	-	-	93.1
Sub Total Projects with Approved Charters	17,843.3	22,533.5	23,082.2	1,683.7	65,142.6
Capital Projects in Planning/Conceptual Design [4]					
. Long-Term FTRs [5]	907.5	-	-	-	907.5
. Packet Broker Infrastructure Replacement Project	-	17.8	982.2	-	1,000.0
. Amazon Web Services Cloud Foundation	-	274.3	700.0	-	974.3
. 2022 Issue Resolution Project	-	-	750.0	-	750.0
. Integrated Market Simulator Phase II	-	-	500.0	-	500.0
. nGEM Real-time Market Clearing Engine Implementation	-	-	495.0	-	495.0
. Identity and Access Management Phase III	-	-	400.0	-	400.0
. Human Resources Workflow & Document Management	19.2	1.0	-	-	20.2
. Projects Less Than \$100K in Value (Five Projects)	-	86.6	120.3	-	206.9
. Other Emerging Work Projects	-	-	1,470.3	-	1,470.3
Sub Total Capital Projects Planning/ Conceptual Design	926.7	379.7	5,417.8	-	6,724.2
Non-Project Capital Spending	-	4,133.8	3,000.0	-	7,133.8
Capitalized Interest & Loan Fees	-	458.7	500.0	-	958.7
Total Capital Projects	18,770.0	27,505.7	32,000.0	1,683.7	79,959.3

[1] Prior Year(s) spending reflects only those projects with current and future spending.

[2] Total project costs include external and internal labor capital costs.

[3] The Forward Capacity Market Nested Zones project was previously known as the 2020 Forward Capacity Markets Improvement project.

[4] All estimates are subject to material change until rules are finalized, approved by FERC, scope is defined and project chartered.

[5] The Long-Term FTRs project has been indefinitely deferred pending the development of appropriate credit requirements.

ISO NEW ENGLAND INC.

FERC COMPLIANCE FILING -12/31/2021

ALLOCATION ON UNRECOVERED PLANT IN SERVICE/UNAMORTIZED COST OF PLANT

Line No.	Description	Unrecovered Basis			Self-Funding Tariff				
		Total	Adjustments	Adj. Total	Total	Schedule 1	Schedule 2	Schedule 3	
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
1	2021 Items:								
2	Building Improvements	\$ 558,738	\$ -	\$ 558,738	\$	558,738	120,408	289,147	149,183
3	Furniture, Fixtures, and Equipment	1,762	-	1,762		1,762	380	912	470
4	Non-Project Capital Spending (Hardware and Software)	2,832,356	-	2,832,356		2,832,356	610,373	1,465,744	756,239
5	Market Systems and Enhancement Projects	20,121,863	-	20,121,863		20,121,863	1,749,527	14,077,256	4,295,080
6	Non-Market Systems and Enhancement Projects	5,075,478	-	5,075,478		5,075,478	1,022,514	2,620,774	1,432,190
7	Total 2021 Items - \$	\$ 28,590,196	\$ -	\$ 28,590,196	\$	28,590,196	\$ 3,503,202	\$ 18,453,833	\$ 6,633,162
8	Total 2021 Items - %					100.00%	12.25%	64.55%	23.20%
9									
10	2020 Items:								
11	Building Improvements	\$ 447,016	\$ -	\$ 447,016	\$	447,016	96,332	231,331	119,353
12	Furniture, Fixtures, and Equipment	6,898	-	6,898		6,898	1,487	3,570	1,842
13	Non-Project Capital Spending (Hardware and Software)	1,377,760	-	1,377,760		1,377,760	296,907	712,991	367,862
14	Market Systems and Enhancement Projects	11,736,288	-	11,736,288		11,736,288	874,629	8,694,606	2,167,054
15	Non-Market Systems and Enhancement Projects	4,548,477	-	4,548,477		4,548,477	888,632	2,119,480	1,540,365
16	Total 2020 Items - \$	\$ 18,116,439	\$ -	\$ 18,116,439	\$	18,116,439	\$ 2,157,987	\$ 11,761,977	\$ 4,196,476
17	Total 2020 Items - %					100.00%	11.91%	64.92%	23.16%
18									
19	2019 Items:								
20	Building Improvements	\$ 198,348	\$ -	\$ 198,348	\$	198,348	42,744	102,645	52,959
21	Furniture, Fixtures, and Equipment	-	-	-		-	-	-	-
22	Non-Project Capital Spending (Hardware and Software)	448,022	-	448,022		448,022	96,549	231,852	119,622
23	Market Systems and Enhancement Projects	8,735,015	-	8,735,015		8,735,015	1,275,561	5,891,680	1,567,774
24	Non-Market Systems and Enhancement Projects	3,189,807	-	3,189,807		3,189,807	696,008	1,615,686	878,113
25	Total 2019 Items - \$	\$ 12,571,191	\$ -	\$ 12,571,191	\$	12,571,191	\$ 2,110,861	\$ 7,841,862	\$ 2,618,468
26	Total 2019 Items - %					100.00%	16.79%	62.38%	20.83%
27									
28	2018 Items:								
29	Building Improvements	\$ 14,242	\$ -	\$ 14,242	\$	14,242	\$ 3,069	\$ 7,370	\$ 3,803
30	Furniture, Fixtures, and Equipment	13,378	-	13,378		13,378	2,883	6,923	3,572
31	Non-Project Capital Spending (Hardware and Software)	65,130	-	65,130		65,130	14,036	33,705	17,390
32	Market Systems and Enhancement Projects	3,516,729	-	3,516,729		3,516,729	522,345	2,528,739	465,645
33	Non-Market Systems and Enhancement Projects	1,396,711	-	1,396,711		1,396,711	298,200	730,300	368,211
34	Total 2018 Items - \$	\$ 5,006,190	\$ -	\$ 5,006,190	\$	5,006,190	\$ 840,533	\$ 3,307,037	\$ 858,620
35	Total 2018 Items - %					100.00%	16.79%	66.06%	17.15%
36									
37	2017 Items:								
38	Building Improvements	\$ 360,905	\$ -	\$ 360,905	\$	360,905	\$ 77,775	\$ 186,768	\$ 96,362
39	Furniture, Fixtures, and Equipment	31,673	-	31,673		31,673	6,826	16,391	8,457
40	Non-Project Capital Spending (Hardware and Software)	-	-	-		-	-	-	-
41	Market Systems and Enhancement Projects	1,164,291	-	1,164,291		1,164,291	97,303	1,022,347	44,641
42	Non-Market Systems and Enhancement Projects	268,525	-	268,525		268,525	52,272	138,507	77,746
43	Total 2017 Items - \$	\$ 1,825,395	\$ -	\$ 1,825,395	\$	1,825,395	\$ 234,175	\$ 1,364,014	\$ 227,206
44	Total 2017 Items - %					100.00%	12.83%	74.72%	12.45%

ISO NEW ENGLAND INC.

FERC COMPLIANCE FILING -12/31/2021

ALLOCATION ON UNRECOVERED PLANT IN SERVICE/UNAMORTIZED COST OF PLANT

Line No.	Description	Unrecovered Basis			Self-Funding Tariff			
		Total	Adjustments	Adj. Total	Total	Schedule 1	Schedule 2	Schedule 3
45								
46	2016 Items:							
47	Building Improvements	\$ 154,274	\$ -	\$ 154,274	\$ 154,274	\$ 33,246	\$ 79,837	\$ 41,191
48	Furniture, Fixtures, and Equipment	1,068	-	1,068	1,068	230	553	285
49	Non-Project Capital Spending (Hardware and Software)	2,113	-	2,113	2,113	455	1,093	564
50	Market Systems and Enhancement Projects	226,169	-	226,169	226,169	68,795	124,566	32,807
51	Non-Market Systems and Enhancement Projects	64,870	-	64,870	64,870	7,240	33,023	24,607
52	Total 2016 Items - \$	\$ 448,494	\$ -	\$ 448,494	\$ 448,494	\$ 109,967	\$ 239,073	\$ 99,455
53	Total 2016 Items - %				100.00%	24.52%	53.31%	22.18%
54								
55	2015 Items:							
56	Building Improvements	\$ 8,883	\$ -	\$ 8,883	\$ 8,883	\$ 1,914	\$ 4,597	\$ 2,372
57	Furniture, Fixtures, and Equipment	23,551	-	23,551	23,551	5,075	12,188	6,288
58	Non-Project Capital Spending (Hardware and Software)	-	-	-	-	-	-	-
59	Market Systems and Enhancement Projects	-	-	-	-	-	-	-
60	Non-Market Systems and Enhancement Projects	18,391	-	18,391	18,391	3,963	9,517	4,910
61	Total 2015 Items - \$	\$ 50,826	\$ -	\$ 50,826	\$ 50,826	\$ 10,953	\$ 26,302	\$ 13,571
62	Total 2015 Items - %				100.00%	21.55%	51.75%	26.70%
63								
64	2014 Items:							
65	Building Improvements	\$ 21,324	\$ -	\$ 21,324	\$ 21,324	\$ 4,595	\$ 11,035	\$ 5,693
66	Back-up Control Center	1,268,177	-	1,268,177	1,268,177	273,292	656,282	338,603
67	Furniture, Fixtures, and Equipment	-	-	-	-	-	-	-
68	Non-Project Capital Spending (Hardware and Software)	152,891	-	152,891	152,891	32,948	79,121	40,822
69	Market Systems and Enhancement Projects	46,162	-	46,162	46,162	-	46,162	-
70	Non-Market Systems and Enhancement Projects	-	-	-	-	-	-	-
71	Total 2014 Items - \$	\$ 1,488,554	\$ -	\$ 1,488,554	\$ 1,488,554	\$ 310,835	\$ 792,600	\$ 385,119
72	Total 2014 Items - %				100.00%	20.88%	53.25%	25.87%
73								
74	2013 Items:							
75	Building Improvements	\$ 14,973	\$ -	\$ 14,973	\$ 14,973	\$ 3,227	\$ 7,748	\$ 3,998
76	Back-up Control Center	14,268,003	-	14,268,003	14,268,003	3,074,755	7,383,691	3,809,557
77	Furniture, Fixtures, and Equipment	-	-	-	-	-	-	-
78	Non-Project Capital Spending (Hardware and Software)	190,670	-	190,670	190,670	41,089	98,672	50,909
79	Market Systems and Enhancement Projects	-	-	-	-	-	-	-
80	Non-Market Systems and Enhancement Projects	-	-	-	-	-	-	-
81	Total 2013 Items - \$	\$ 14,473,646	\$ -	\$ 14,473,646	\$ 14,473,646	\$ 3,119,071	\$ 7,490,112	\$ 3,864,463
82	Total 2013 Items - %				100.00%	21.55%	51.75%	26.70%
83								
84	2012 Items:							
85	Building Improvements	\$ 29,427	\$ -	\$ 29,427	\$ 29,427	\$ 6,342	\$ 15,229	\$ 7,857
86	Back-up Control Center	1,338,709	-	1,338,709	1,338,709	288,492	692,782	357,435
87	Furniture, Fixtures, and Equipment	-	-	-	-	-	-	-
88	Non-Project Capital Spending (Hardware and Software)	257,081	-	257,081	257,081	55,401	133,040	68,641
89	Market Systems and Enhancement Projects	-	-	-	-	-	-	-
90	Non-Market Systems and Enhancement Projects	-	-	-	-	-	-	-

ISO NEW ENGLAND INC.
FERC COMPLIANCE FILING -12/31/2021

ALLOCATION ON UNRECOVERED PLANT IN SERVICE/UNAMORTIZED COST OF PLANT

Line No.	Description	Unrecovered Basis			Self-Funding Tariff			
		Total	Adjustments	Adj. Total	Total	Schedule 1	Schedule 2	Schedule 3
91	Total 2012 Items - \$	\$ 1,625,217	\$ -	\$ 1,625,217	\$ 1,625,217	\$ 350,234	\$ 841,050	\$ 433,933
92	Total 2012 Items - %				100.00%	21.55%	51.75%	26.70%
93								
94	2010 Items:							
95	Facilities Project	\$ 8,924	\$ -	\$ 8,924	\$ 8,924	\$ 1,923	\$ 4,618	\$ 2,383
96	Furniture, Fixtures, and Equipment	-	-	-	-	-	-	-
97	Total 2010 Items - \$	\$ 8,924	\$ -	\$ 8,924	\$ 8,924	\$ 1,923	\$ 4,618	\$ 2,383
98	Total 2010 Items - %				100.00%	21.55%	51.75%	26.70%
99								
100	2009 Items:							
101	Facilities Project	\$ 9,681	\$ -	\$ 9,681	\$ 9,681	\$ 2,086	\$ 5,010	\$ 2,585
102	Non-Project Capital Spending (Hardware and Software)	-	-	-	-	-	-	-
103	Total 2009 Items - \$	\$ 9,681	\$ -	\$ 9,681	\$ 9,681	\$ 2,086	\$ 5,010	\$ 2,585
104	Total 2009 Items - %				100.00%	21.55%	51.75%	26.70%
105								
106	2008 Items:							
107	Facilities Project	\$ 8,884	\$ -	\$ 8,884	\$ 8,884	\$ 1,914	\$ 4,597	\$ 2,372
108	Non-Market Systems and Enhancement Projects	209,718	-	209,718	209,718	45,194	108,529	55,995
109	Total 2008 Items - \$	\$ 218,602	\$ -	\$ 218,602	\$ 218,602	\$ 47,109	\$ 113,126	\$ 58,367
110	Total 2008 Items - %				100.00%	21.55%	51.75%	26.70%
111								
112	2007 Items:							
113	Facilities Project	\$ 1,578,299	\$ -	\$ 1,578,299	\$ 1,578,299	\$ 340,123	\$ 816,770	\$ 421,406
114	Non-Market Systems and Enhancement Projects	1,061,593	-	1,061,593	1,061,593	228,773	549,374	283,445
115	Total 2007 Items - \$	\$ 2,639,892	\$ -	\$ 2,639,892	\$ 2,639,892	\$ 568,897	\$ 1,366,144	\$ 704,851
116	Total 2007 Items - %				100.00%	21.55%	51.75%	26.70%
117								
118	2006 Items:							
119	Facilities Project	\$ 5,545,254	\$ -	\$ 5,545,254	\$ 5,545,254	\$ 1,195,002	\$ 2,869,669	\$ 1,480,583
120	Total 2006 Items - \$	\$ 5,545,254	\$ -	\$ 5,545,254	\$ 5,545,254	\$ 1,195,002	\$ 2,869,669	\$ 1,480,583
121	Total 2006 Items - %				100.00%	21.55%	51.75%	26.70%
122								
123	2005 Items:							
124	Building/property improv. (Renov. workspace, network & voice rewiring)	\$ 7,278,135	\$ -	\$ 7,278,135	\$ 7,278,135	\$ 1,568,438	\$ 3,766,435	\$ 1,943,262
125	Capital Interest/Fees	137,688	-	137,688	137,688	-	90,185	47,502
126	Total 2005 Items - \$	\$ 7,415,822	\$ -	\$ 7,415,822	\$ 7,415,822	\$ 1,568,438	\$ 3,856,620	\$ 1,990,764
127	Total 2005 Items - %				100.00%	21.15%	52.01%	26.84%
128								
129	2004 Items:							
130	Building/property improv. (Renov. workspace, network & voice rewiring)	\$ 392,761	\$ -	\$ 392,761	\$ 392,761	\$ 84,640	\$ 203,254	\$ 104,867
131	Capital Interest/Fees	13,664	-	13,664	13,664	-	8,950	4,714
132	Total 2004 Items - \$	\$ 406,426	\$ -	\$ 406,426	\$ 406,426	\$ 84,640	\$ 212,204	\$ 109,581
133	Total 2004 Items - %				100.00%	20.83%	52.21%	26.96%
134								
135	Total Unrecovered Plant in Service - \$	\$ 100,440,750	\$ -	\$ 100,440,750	\$ 100,440,750	\$ 16,215,914	\$ 60,545,251	\$ 23,679,585
136	- %				100.00%	16.14%	60.28%	23.58%

Attachment 2

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