Section	Existing Text or Section	Suggested Text	Comments
1.1.1	"Independent Service Operator of New England (ISO-NE)"	ISO New England	ISO New England is the full name of the organization and does not need to be further spelled out, but should you wish to explain what we are, we are the independent *system* operator.
3.1.1	"Incumbent transmission owners plan local projects in New England, typically radial expansion of a network or lower voltage level transmission facilities. These do not require ISO-NE formal review or approval."		All projects 69kV and greater must be reviewed by the ISO to ensure that there is no adverse impact to the system. This also applies when certain generation is interconnected on the distribution system.
3.1.1	"The New England Clean Energy Connect (NECEC) project is an example of a public policy project that ISO-NE studied as an ETU."	"The New England Clean Energy Connect (NECEC) project is an example of a project that ISO-NE studied as an ETU."	While NECEC was a response to a state solicitation driven by public policy, referring to this project as a "public policy project" may mislead the reader to believe that this project was related to the Order 1000 public policy process.
3.1.1	"To date, these processes have been used infrequently and have not resulted in any regional transmission upgrades, although ISO-NE is currently in the process of developing tariff language for the longer-term transmission planning process that would allow states to operationalize study results through an ISO-NE led procurement."		This section may be misleading. ISO New England has only recently received approval for the longer-term transmission planning tariff changes. Additionally, the Public Policy process has been used three times since its inception. In each of those times, the states, through NESCOE, indicated that under the existing ISO Tariff, there was not a sufficient basis to initiate a Public Policy Transmission Study. There have been 169 ETU applications in the queue. Finally, the New England Clean Energy Connect (NECEC) project was an ETU which will result in transmission upgrades once completed.

Section	Existing Text or Section	Suggested Text	Comments
3.1.2.4	"In New England, the ISO-NE 2023 Energy Shortfall Study supports this concern. Specifically, more hydro power imports into the region by existing and new circuits could reinforce the overall resiliency of the region."	"In New England, the ISO-NE Operational Impact of Extreme Weather Events study shows that incremental imports from the New England Clean Energy Connect (NECEC) project help mitigate energy shortfalls, and additional imports, whether from hydroelectric or other dispatchable sources, further mitigate that risk.	The title of this report appears to be incorrect, and greater imports into the region are equally valuable whether they come from hydroelectric or other dispatchable sources. If desired, a link may be added to the final report, which is located on the ISO-NE website at: https://www.iso-ne.com/static-assets/documents/100006/operational_impact_of_exteme_weather_events_final_report.pdf
3.1.7, 3.1.9.1, and throughout	Figure 1, Figure 2, and all references to the 2050 Transmission Study		All references to the 2050 Transmission Study, including graphs and visualizations should be cited as "Draft." The final 2050 Transmission Study report has not been released and information included in the draft report is subject to change as a result of stakeholder feedback.
3.1.8	"In most scenarios, the current paths to import power into Boston were unable to support increasing load due to high load and low assumed generation in the area."	"In most scenarios, the current paths to import power into Boston were unable to support increasing load due to high load and despite assumed growth in offshore wind and energy storage interconnections in the area."	While the amount of generation in the greater Boston area is relatively low today, the 2050 study's input assumptions included a significant amount of offshore wind and energy storage in greater Boston by the year 2050.
3.1.9.1	"For context, total transmission spending between 2002 and 2023 totaled $15.3 billion, or an average of approximately $0.73 billion per year."	For context, total transmission spending on reliability-based and asset condition projects between 2002 and 2023 totaled $15.3 billion, or an average of approximately $0.73 billion per year."	
3.1.9.3	"The proposal contemplates that costs for projects selected through the solicitation would be allocated across the region on a load share basis."	The proposal contemplates that costs for projects selected through the solicitation would be allocated across the region on a load share basis by default, but would allow for alternative cost allocation if requested by NESCOE.	
3.1.9.2		"A draft Technical Appendix to the 2050 Transmission Study was also released on December 4, 2023, with a 30-day comment period."	Suggested addition to section 3.1.9.2.

Section	Existing Text or Section	Suggested Text	Comments
3.1.9.3	Section 3.1.9.3 title: "Phase 2 tariff change"	"Longer-Term Transmission Phase 2 Tariff Changes"	Suggest specifying "Longer-Term Transmission" here to avoid any confusion with the Phase II transmission facility in central Massachusetts.
4.1.3	"As noted above, incumbent transmission owners plan local projects in New England, typically radial expansion of a network or lower voltage level transmission facilities. These do not require formal review or approval by ISO-NE. Costs of these projects are allocated locally, to the transmission customer causing the need for the project."		These projects may require Proposed Plan Application review by the ISO.
6	"This is because spare injection headroom has been exhausted and new, regional headroom has not been planned and constructed."		The ISO would suggest eliminating "This is because" in the identified sentence. The exhaustion of spare injection headroom is not the reasoning behind the cost allocation as implied here.
7.1.1	Section 7.1.1		DLRs provide benefit in real time and near real time operation of the system. Their consideration in planning may be limited to certain use cases. Planning studies still need to assume that it is hot during summer peak load conditions. With the implementation of ambient-adjusted ratings (AARs), the impact of lower temperatures on equipment ratings can already be accounted for when considering winter peak load in planning studies. If DLRs and rating methodologies are consistent, static line ratings under the assumed conditions of the planning assessment will be reasonably close to those ratings being provided by DLRs under the studied conditions.

Section	Existing Text or Section	Suggested Text	Comments
9.1	"To the extent new onshore transmission lines are needed, the Commonwealth should encourage the co-location of transmission infrastructure within state-owned or state-controlled properties and corridors, such as highway and railroad rights-of-way. The legislature should consult with relevant agencies (such as Massachusetts Department of Transportation and the Massachusetts Bay Transit Authority) and consider allocating additional resources to these agencies or granting additional statutory authority to support the Commonwealth's clean energy transition. This aligns with federal guidance on leveraging alternative uses of highway rights-of-way."		Locating facilities along railroads is often problematic. The TOs are not granted access to maintain the lines because it limits train use of the corridor.
9.2	"By using GETs, including DLR, to lower generator interconnection costs…"		This section likely overstates the benefit of DLRs in long-term planning and resource interconnection. As stated in the comment on section 7.1.1, above, the transmission system must be planned for the most severe conditions that are likely to occur. Under these conditions, and with the implementation of AARs as envisioned in FERC Order 881, there will likely be little to no difference between static ratings and those achievable with DLRs.

Section	Existing Text or Section	Suggested Text	Comments
Section 7 or Section 9		"In general terms, the Grid-enhancing Technologies (GETs) discussed here (dynamic line ratings, power flow controllers, and topology control) seek to maximize the use of a system that is thermally limited. These GETs allow more power to move through transmission facilities before the facilities are overloaded. Implementation of these technologies can have many benefits on systems where thermal limitations prevent optimal use of the existing facilities, and these benefits are typically associated with day to day operation of the system rather than long term planning. However, most meaningful limits on today's transmission system in New England are either stability or voltage based. As a result of the extensive transmission system additions over the past twenty years, there is very little congestion on the New England system today. Therefore, there must be careful consideration of the additional expense and complexity that are inherent to these devices versus their benefit."	See previous comments on use of GETs.
9.6	Section 9.6		The 2050 Transmission Study is still in draft form and the draft report is subject to change based on stakeholder feedback.