

From: Gagnon, Ashley A (EEA)
Sent: Friday, November 1, 2024 12:56 PM
To: PACMattersList@iso-ne.com
Subject: MA EEA Interregional Modeling Comments

Good afternoon,

The Massachusetts Executive Office of Energy and Environmental Affairs (MA EEA) appreciates ISO-NE's interregional modeling updates and efforts to more comprehensively model seams in its economic study process. As a general matter, we hope that this interregional modeling effort can be built on to analyze the benefits and costs of interregional transmission more broadly, examining these opportunities in a holistic manner beyond just reducing system congestion. As FERC Order No. 1920 and the recent ISO-NE Longer-Term Transmission Planning Reforms illustrate, transmission development can provide multiple value streams to consumers and proactive system planning is key to unlocking these benefits.

MA EEA has several questions based on ISO-NE's recent [PAC presentation](#) and hopes that ISO-NE can provide its responses as part of a presentation at a future committee meeting.

1. It appears that NERC LTRA Tier 1 criteria may result in a conservative set of future resources given that development timelines for resources could be less than 10 years. Did ISO-NE consider criteria other than NERC LTRA Tier 1 inclusion rules?
 - Relatedly, it appears that the Sunrise Wind and South Fork wind farms, resources with PPAs that are under construction and would meet NERC LTRA Tier 1 criteria, are not reflected in the resource assumptions on Slide 8. Is this correct and, if so, could ISO-NE explain why? Are there resources in other regions that would meet LTRA Tier 1 criteria but are not reflected in this table?
2. Slide 10 notes that the same fuel prices are assumed for all regions. Given persistent differences in natural gas prices between NY and NE, can ISO-NE provide more detail about why setting equal prices is preferable to projecting annual and seasonal differences forward 10 years? While we appreciate the ISO's caution in seeking to avoid "transmission development based solely on future price projections," how does ISO-NE weigh this consideration against the benefit of increasing interregional trading opportunities to access lower cost markets for consumers?
3. Do net exports of 2.86 TWh from HQ (Slide 22) include contracted flows across the Champlain Hudson Power Express (CHPE) and New England Clean Energy Connect (NECEC) interties or is this suggesting HQ is net exporting across existing interties above these contracted flows? If they are inclusive, can ISO-NE share the net flows across the existing interties (e.g., to Sandy Pond in CMA, VT, and NYISO Zone D)? Also, can ISO-NE clarify whether CHPE and NECEC are modeled as monodirectional or bidirectional?

MA EEA appreciates the opportunity to provide the foregoing comments and looks forward to further stakeholder discussions on this topic and other activities related to the 2024 Economic Study and supporting Tariff discussions.

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