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July 30, 2024

VIA EMAIL

Brad Marszalkowski
Supervisor, Resource Integration System Planning
BMarszalkowski@ISO-NE.com

Re: Affected System Operator (ASO) Study Coordination with Order No. 2023

Dear Brad:

The Massachusetts Executive Office of Energy and Environmental Affairs (EEA) appreciates the opportunity to provide comments regarding ISO New England's (ISO-NE) proposed revisions to Planning Procedure 5-6 (PP5-6) to describe how ASO Studies for non-Federal Energy Regulatory Commission (FERC) jurisdictional distributed generation (DG) projects will be coordinated with the cluster studies required under FERC's Order No. 2023 (Order 2023).

It is critical that the ASO Study coordination process does not delay or frustrate the development of DG resources in Massachusetts and across the region. DG resources are essential to ensuring Massachusetts' ability to meet its clean energy and climate requirements and provide customers with an affordable, reliable, and modernized electric grid. A transparent and efficient ASO Study coordination process that fully accounts for existing state interconnection processes is a key component to timely DG deployment throughout New England.

We understand that stakeholders are concerned that ISO-NE's proposal to conduct electrical relevancy and Level 0/III determinations during limited, pre-defined windows that, depending on FERC-jurisdictional cluster restudy needs may occur every 270 days,¹ could

¹ State Jurisdictional Interconnection Process Review, Affected System Operator (ASO) Study Coordination, slide 16 (June 18, 2024).

introduce additional delays to state-jurisdictional interconnections.² To address this concern, a group of clean energy developers, led by New Leaf Energy, jointly proposed an amendment that would require ISO-NE to continue conducting electrical relevancy and Level 0/III determinations on a monthly basis.³ Under this approach, projects determined to be Level 0 would proceed toward I.3.9 approval while Level III, non-electrically relevant projects would have the option to start their own ASO study which would not need to coordinate with the cluster.⁴

EEA appreciates ISO-NE's openness to solicit and consider stakeholder feedback on "alternative approaches that balance [] noted objectives, while still achieving coordination with the new Order No. 2023 construct."⁵ We strongly encourage ISO-NE to give New Leaf's and any similar stakeholder proposals received between now and the August Reliability Committee vote serious consideration. We are confident that ISO-NE's continued collaborative approach to Order 2023 and close work with stakeholders, including affected clean energy developers, will lead to a solution that can reasonably balance concerns regarding additional delays to state-jurisdictional interconnection processes with the coordination of ASO Studies and FERC-jurisdictional cluster studies.

Thank you for considering our comments and please do not hesitate to reach out if you have any questions.

Sincerely,

s/Ashley Gagnon

Ashley Gagnon

Federal and Regional Energy Affairs Senior Director
Executive Office of Energy and Environmental Affairs

cc: NEPOOL Reliability Committee

² New Leaf Energy Proposed Amendments to PP5-6 Regarding ASO Coordination, slide 3 (Just 25, 2024); OnSite Renewables, Affected System Operator (ASO) Study Coordination Memorandum, at 1 (July 15, 2024).

³ New Leaf Energy Proposed Amendments, at slides 3-4.

⁴ *Id.*, at slide 4.

⁵ State Jurisdictional Interconnection Process Review, Affected System Operator (ASO) Study Coordination, at slide 2 (July 25, 2024) (available at: https://www.iso-ne.com/static-assets/documents/100013/a09_02_01_a_aso_study_coordination.pdf).