United States Senate

April 30, 2024

Gordon van Welie
President and CEO
ISO New England
One Sullivan Road
Holyoke, MA 01040

Dear Mr. van Welie:

As New England undergoes significant electric grid transformation, we write to urge ISO-New England (ISO-NE) to continue to improve its governance policies, proactively plan for new transmission, and ensure fair access to markets for clean energy technologies. Too many of ISO-NE's policies—as well as those of the New England Power Pool (NEPOOL), its stakeholder advisory group—limit community involvement, stymie comprehensive transmission investment, and prioritize incumbent fossil interests over affordable and reliable clean technologies. Even though ISO-NE is funded by ratepayers, it lacks key accountability measures and has historically failed to meet the needs of states with clean energy and climate targets. While we are encouraged by ongoing progress on transparency, longer term transmission planning, and resource accreditation, ISO-NE must listen to its customers, state leaders, and advocates to ensure a clean energy grid that works for all.

Transparent and Accountable Governance

ISO-NE charges ratepayers across New England more than $200 million annually to fund its operations including more than $2 million for your salary, and proposed a 21.5 percent budget increase for 2024.[1] With such enormous operating revenue funded from the pockets of customers, ISO-NE has an outsized obligation to ensure transparency and accountability, diverse leadership, open meetings, and stakeholder engagement. ISO-NE's 10-member board of directors (or Board) is currently stacked with energy industry representatives. We urge you to diversify the ISO-NE Board to include those with experience and expertise on environmental justice, consumer protection, clean energy, and New England state policies. To do so, ISO-NE should change its slate voting system, where stakeholders must vote for or against an entire slate of nominees, providing stakeholders with only a façade of choice for the Board. We urge you to

[1] Jon Lamson, *ISO-NE Proposes 21.5% Budget Increase for 2024*, RTO Insider (Aug. 13, 2023), https://www.rtoinsider.com/52613-iso-ne-proposes-budget-increase-2024/; Tyson Slocum, *ISO-NE: The Most Powerful and Unaccountable Utility in New England*, Public Citizen (Sept. 8, 2023), https://www.citizen.org/wp-content/uploads/ISONEA.pdf; Jon Lamson, *NEPOOL Participants Committee Briefs: Oct. 5, 2023*, RTO Insider (Oct. 9, 2023), https://www.rtoinsider.com/57809-nepool-pc-100523/.

change this anti-democratic system so that stakeholders may vote for or against board members individually.

The Board must also operate in a more open and transparent manner, and continue to improve upon its governance reforms.[2] It is encouraging that ISO-NE held its second public board meeting this year, after being the only grid operator in the country to hold all its board meetings behind closed doors. But ISO-NE must go further and open all its board meetings to the public.[3] This includes facilitating public participation by widely distributing meeting information in advance of board meeting dates and ensuring community members have the opportunity to raise concerns and questions leading up to and during public board proceedings, through in person and remote engagement. This is especially important considering NEPOOL's meetings are closed to the public, which already limits the ability of the public to participate as stakeholders. ISO-NE should also endeavor to provide accessible public materials related to meetings and policy or administrative changes. For example, plain language one-pagers that summarize key agenda items and decisions, published before and after board proceedings, would help ensure that ISO-NE decisions and policies are not only understood by those with technical or professional expertise, but also by the public at large.

To enable true community participation, ISO-NE must improve its current stakeholder engagement process. ISO-NE's plans to establish a position dedicated to community engagement and environmental justice is an important first step, but cannot stop there. ISO-NE must develop a strong environmental justice team with the expertise, decision-making power, and staffing capacity to uplift lived experiences, account for social costs and benefits, and align with larger environmental justice priorities, such as the Biden administration's Justice40 Initiative.

The Board should also engage more deeply with the ISO-NE Consumer Liaison Group (CLG) to ensure that public interest is a core tenet of all future decisions and policies. Now that more community voices have been elected to the CLG governing committee, the Board and ISO-NE leadership should continue to participate in CLG meetings in order to fully assess and understand the impacts of its decisions on the communities it serves and who pay for its operation.[4]

Finally, ISO-NE should better equip consumers to more effectively advocate in grid proceedings. Currently, the state-authorized consumer advocates that represent the 15 million consumers who ultimately pay the entire region's electricity costs hold less than 2 percent of the

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[2] Letter to NESCOE Board of Directors. From ISO-NE Board of Directors. *ISO New England Governance Enhancements – Update to May 20, 2022 Memo*, (July 6, 2022), https://www.iso-ne.com/static-assets/documents/2022/05/board_memo_to_nescoe_governance_enhancements_052022.pdf

[3] Sabrina Shankman, *New England's Electric Grid Operator Opened its Doors to Public Participation — and Got a Dressing Down,* Boston Globe (Nov. 1, 2022), https://www.bostonglobe.com/2022/11/01/science/new-englands-electric-grid-operator-opened-its-doors-public-participation-got-dressing-down/.

[4] Sabrina Shankman, *Power to the People: How Activists are Working to Change New England's Grid Operator From the Inside*, Boston Globe (Jan. 26, 2023), https://www.bostonglobe.com/2023/01/25/science/how-climate-activists-took-over-little-known-group-iso-new-england/.

voting power in NEPOOL.[5] While the NEPOOL voting structure must change—which gives outsized voting influence to power generator and utility operator members to the detriment of public interest advocates—ISO-NE can still make progress.[6] ISO-NE should consider a tariff-funded consumer advocate representative organization, which would provide a steady, regionalized source of funding to support state consumer advocates in their engagement at NEPOOL.[7] This will help address the imbalance of power, in pursuit of a voting body that is truly democratic.

Holistic Transmission Planning

Increased transmission capacity is critical for affordability, reliability, and decarbonization. New England state climate plans, such as the Massachusetts Clean Energy and Climate Plan, identify transmission as key to bringing on new renewable capacity and meeting clean energy goals.[8] By ISO-NE's own estimates, approximately 4,000 miles—or 50 percent—of New England's transmission lines could be overloaded by 2050, due to increased electrification demand.[9] As of March 2024, 71 transmission project components were planned, proposed, or under construction across ISO-NE, and in a recent report, the region earned a grade of D+ in Overall Transmission Planning and an F for Transmission Capacity Available for New Resources.[10] In a separate report on interconnection of energy projects, the region also ranked second-lowest with a D+.[11]

Given the importance of increased transmission capacity, new transmission planning and deployment processes are urgently needed. We are encouraged by ISO-NE's progress on its 2050 Transmission Study—the first longer-term transmission planning study in the region—and the ongoing effort between ISO-NE and the New England States Committee on Electricity

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[5] NEPOOL Participants, https://nepool.com/participants/ (last visited Feb. 2, 2024).
[6] *New England Power Pool Second Restated NEPOOL Agreement*, NEPOOL (April 7, 2017), https://www.iso-ne.com/static-assets/documents/2015/01/op_2d_rna.pdf ("NEPOOL Agreement")
[7] Letter from Consumer Advocates of New England. To Heather Hunt, New England States Committee on Electricity. *New England Energy Vision, Governance Ideas* (Mar. 26, 2021).
[8] *Massachusetts Clean Energy and Climate Plan for 2025 and 2030*, State of Massachusetts, (June 30, 2022), https://www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download; *A Transmission Blueprint for New England: Delivering on Renewable Energy*, RENEW Northeast (May 23, 2022), https://renewne.org/transmission-blueprint-for-new-england/; Joint State Innovation Partnership for Offshore Wind (Jan. 2023), https://newenglandenergyvision.files.wordpress.com/2023/01/joint-state-innovation-partnership-for-offshore-wind-concept-paper.pdf.
[9] Future Grid Reliability Study Summary, ISO-NE (Sept. 2022), https://www.iso-ne.com/static-assets/documents/2022/09/future_grid_reliability_study_summary_03.pdf.
[10] RSP Project List and Asset Condition List March 2024 Update, Planning Advisory Meeting, ISO New England (Mar. 20, 2024); Zach Zimmerman et al., *Transmission Planning and Development Regional Report Card*, Americans for a Clean Energy Grid (June 2023), https://www.cleanenergygrid.org/wp-content/uploads/2023/06/ACEG_Transmission_Planning_and_Development_Report_Card.pdf;
[11] *Advanced Energy United Generator Interconnection Scorecard*, Advanced Energy United (Mar. 6, 2024). https://blog.advancedenergyunited.org/reports/generator-interconnection-customer-survey-and-performance-scorecard

(NESCOE) to better plan for transmission over a longer time horizon.[12] The second phase of the 2050 Transmission Study, already approved by NEPOOL, will capitalize on the momentum of states and establish the procurement process and cost allocation framework to get New England to its 2050 transmission goals. This codified structure will enable all states to have a seat at the table, minimize project-by-project negotiations, and enable more rapid and equitable transmission development.[13]

Still, there is room for more proactive, holistic, and community-centered transmission planning. The Federal Energy Regulatory Commission (FERC) is currently finalizing its "Regional Transmission Planning and Cost Allocation and Generator Interconnection" proposed rule.[14] ISO-NE should use that filing to improve its transmission planning by accounting for extreme weather scenarios, incorporating advanced transmission technologies and grid-enhancing technologies such as dynamic line ratings and high-performance conductors, and considering the full scope of transmission benefits including health, environmental justice, and emissions impacts. Additionally, ISO-NE should collaborate to address gaps in the oversight of asset condition projects that refurbish or rebuild transmission in existing rights of way, and advocate to incorporate these projects into planning processes.[15]

ISO-NE must also expand interregional transmission planning to improve system resilience and reduce decarbonization costs through access to diverse generation across varying climate zones.[16] ISO-NE is already interconnected with the New York Independent System Operator (NYISO), TransEnergie (Québec), and the New Brunswick System Operator, through which it imports around 17 percent of its annual energy needs.[17] Bidirectional interregional transfer capacity should be further explored for reliability and integration of clean energy resources, yet New England Clean Energy Connect is the only interregional transmission line to Quebec currently under construction, and will only deliver energy north to south.[18] In partnership with

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[12] *Transmission Planning for the Clean Energy Transition – Pilot Study Final Report*, ISO-NE (Jan. 2022), https://www.iso-ne.com/static-assets/documents/2022/01/final_transmission_planning_for_clean_enery_transitiont_pilot_study_report.pdf.

[13] Jon Lamson, *NEPOOL PC Supports Additional Delay of FCA 19*, RTO Insider (April 7, 2024) https://www.rtoinsider.com/75605-nepool-pc-additional-delay-fca-19/; *Extended-Term Transmission Planning Tariff Changes Key Project*, ISO-NE (last visited April 1, 2024), https://www.iso-ne.com/committees/key-projects/extended-term-transmission-planning-key-project; Jennifer Danis et al., *Transmission Planning for the Energy Transition,* Institute for Policy Integrity (Dec. 1, 2023), https://policyintegrity.org/publications/detail/transmission-planning-for-the-energy-transition

[14] Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection, 87 Fed. Reg. 26504, 26504 (May 4, 2022) (to be codified at 18 C.F.R. 35), https://www.federalregister.gov/documents/2022/05/04/2022-08973/building-for-the-future-through-electricregional-transmission-planning-and-cost-allocation-and.

[15] *States Press New England TOs on Asset Condition Projects,* RTO Insider (May 19, 2023) https://www.rtoinsider.com/32235-states-press-new-england-tos-asset-condition-projects/

[16] *National Transmission Needs Study*, U.S. Department of Energy (Oct. 2023), https://www.energy.gov/sites/default/files/2023-12/National%20Transmission%20Needs%20Study%20-%20Final_2023.12.1.pdf.

[17] ISO-NE, FERC, https://www.ferc.gov/industries-data/electric/electric-power-markets/iso-ne.

[18] *National Grid says Biden-backed transmission line 'not viable,'* Commonwealth Beacon (last updated Oct. 19, 2023), https://commonwealthbeacon.org/energy/national-grid-says-biden-backed-transmission-line-not-viable/.

state governments, ISO-NE should embrace a much more ambitious paradigm for interregional grid coordination and planning with neighboring balancing authorities on both sides of the border, building on the work of the Interregional Planning Stakeholder Advisory Committee.[19] Doing so would enable the greater region to collectively plan and build for the future, achieve shared climate and clean energy goals, and fully harness the complementary energy resources spread across its footprint.[20]

Finally, ISO-NE must improve its processing of the interconnection queue to ensure the timely integration of new clean energy generation and storage onto the grid. As of March 2024, 404 projects were waiting in ISO-NE's Interconnection Request Queue, up from 289 in 2021, the majority of which are battery, wind, and solar.[21] For New England to achieve the lowest cost energy transition that maintains reliability, ISO-NE must maximize the opportunity for reforms through both forward-looking reforms and its imminent filing to the FERC "Improvement to Generator Interconnection Procedures and Agreements" rule, known as Order 2023. It is encouraging that ISO-NE has integrated stakeholder feedback into its modified compliance filing proposal, which will improve interconnection processing speed, increase customer flexibility, and reduce prohibitive network upgrade costs.[22]

Now, ISO-NE must go further by adopting a forward-looking approach to interconnection.[23] This means identifying collective interconnection needs and prioritizing interconnection where transmission capacity is present or approved.[24] ISO-NE can achieve this through exceeding FERC Order 2023's heatmap requirements to provide comprehensive and regular updates of maps of available transmission capacity required by FERC Order 2023 and through prioritization of transparency and data availability. ISO-NE should also investigate the feasibility and practicality of a "connect-and-manage" approach, where pre-approval analysis focuses on the immediate local network upgrades required for a generation request to interconnect to the electric grid, saving more extensive deliverability studies for after a source is integrated.[25] Ultimately, ISO-NE should work with states and neighboring regions to develop a proactive,

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[19] *Interregional Planning Stakeholder Advisory Committee*, ISO-NE, https://www.iso-ne.com/committees/planning/ipsac.

[20] *The Northeast Grid Planning Forum,* Acadia Center (Jan. 12 2024), https://acadiacenter.org/resource/the-northeast-grid-planning-forum-framing-paper/.

[21] *NEPOOL Participants Committee Report*, ISO-NE (Mar. 7, 2024) https://www.iso-ne.com/static-assets/documents/100009/mar-2024-coo-report.pdf.

[22] Jon Lamson, *Stakeholders Propose Amendments to ISO-NE Order 2023 Compliance,* RTO Insider (Jan. 7, 2024), https://www.rtoinsider.com/67718-stakeholders-propose-amendments-to-iso-ne-order-2023-compliance/

[23] Improvements to Generator Interconnection Procedures and Agreements, 88 Fed. Reg. 61014 (July 28, 2023) (to be codified at 18 C.F.R. pt. 35), https://www.federalregister.gov/documents/2023/09/06/2023-16628/improvements-to-generator-interconnection-procedures-and-agreements.

[24] Commissioner Clements Concurrence on Order No. 2023: Improvements to Generator Interconnection Procedures and Agreements, Docket No. RM22-14, FERC (July 28, 2023), https://www.ferc.gov/news-events/news/e-1-commissioner-clements-concurrence-order-no-2023-improvements-generator.

[25] Ethan Howland, *Can ERCOT Show the Way to Faster and Cheaper Grid Interconnecton?*, Utility Dive (Nov. 27, 2023), https://www.utilitydive.com/news/connect-and-manage-grid-interconnection-ferc-ercot-transmission-planning/698949/.

transparent, stakeholder-informed approach to transmission planning to predict future infrastructure and interconnection needs and eliminate the interconnection logjam.

Fair Access to Markets

For years, ISO-NE has routinely made the case that fossil fuels, particularly natural gas, are vital for a reliable grid, especially in extreme weather events. Through skewed market rules and direct subsidies to fossil plants to cover the cost of storing extra fuel for winter, ISO-NE has used this logic to unfairly tilt the playing field in favor of gas. The result is an electricity system increasingly dependent on just-in-time delivery of gas, putting us at risk of failing to meet our climate goals and failing to keep the lights on. Ironically, by subsidizing the very fuel source that contributes to the climate crisis, ISO-NE practices are contributing to the intensifying winter storms that challenge grid reliability. We encourage ISO-NE to strengthen and finalize its new market rules under development, phase out its artificial market support for fossil plants, continue to lead the way in extreme weather resource modeling, and ensure its rules do not prevent energy storage, demand response, and distributed energy resources from participating in the markets.[26]

Gas is a bad investment decision in a world that already needs to address the climate crisis. The North American Electric Reliability Corporation (NERC) found that "growing reliance on natural gas as an electricity generation fuel source increases the potential for common-mode failures that have widespread reliability impacts."[27] In five recent extreme winter weather events, gas plants failed disproportionately in comparison to the percentage of total installed gas capacity. Cold weather can lead to malfunctions in plant operations and equipment as well as constraints in fuel supply, exacerbated by the mutual dependence of power and gas systems. And heat, as well as drought, can also force power plant reductions and forced outages.[28] By contrast, multiple studies have demonstrated the sustained benefits to resilience and reliability that come with a clean and diverse energy mix that includes renewable generation, energy storage, demand-side solutions, and transmission. Modeling by the National Renewable Energy Laboratory, UC Berkeley, and Energy Innovation all demonstrate that a grid run almost entirely on clean electricity and demand management can maintain resource adequacy during extreme weather events.[29]

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[26] Order Accepting Tariff Revisions, 184 FERC ¶ 61,082 (Aug. 4, 2023), https://www.iso-ne.com/static-assets/documents/2023/08/er23-1588-000.pdf.

[27] 2022 State of Reliability Report, North American Electric Reliability Corporation (July 2022), https://www.nerc.com/pa/RAPA/PA/Performance%20Analysis%20DL/NERC_SOR_2022.pdf.

[28] Paul Arbaje & Mark Specht, *Gas Malfunction: Calling into Question the Reliability of Gas Power Plants,* Union of Concerned Scientists (Jan. 9, 2024), https://www.wsj.com/articles/new-england-risks-winter-blackouts-as-gas-supplies-tighten-11665999002; *PJM, 3 other RTOs propose steps to improve gas-electric sector coordination, boost reliability,* Utility Dive (Feb 22, 2024), https://www.utilitydive.com/news/SPP-PJM-New-England-MISO-propose-gas-electric-coordination-improvements/708184/

[29] Rachel Chang, *Renewable Energy Is the Key to Building a More Resilient and Reliable Electricity Grid*, Center for American Progress (Nov. 7, 2023), https://www.americanprogress.org/article/renewable-energy-is-the-key-to-building-a-more-resilient-and-reliable-electricity-grid/; Melissa Birchard & Casey Roberts, *New England's Winter Electricity Challenges Call for a Clean Energy Solution*, Sierra Club et al., https://www.sierraclub.org/sites/default/files/2563%20NE%20Winter%20Reliability%20WP%2003_web.pdf.

Accurate modeling will help ensure ISO-NE's practices reflect more realistic assumptions of resource performance in summer and winter conditions.[30] We are supportive of ISO-NE's probabilistic energy-security study conducted by the Electric Power Research Institute (EPRI), which is innovative in how it accounts for intermittent renewable energy sources. Preliminary results found renewable energy and efficiency improvements are a key to grid stability, and have increased reliability such that the Everett liquefied natural gas (LNG) import facility may no longer be needed.[31] These results would be even stronger if EPRI includes modeling of long duration storage and flexible demand.

Within the ISO-NE Forward Capacity Market, auction rules have long privileged gas-fired generation. The capacity accreditation rules unrealistically assume gas-only resources are available at their summer qualified capacity value year-round, which has not historically been the case during the winter as the gas supply gets diverted to home heating. They also excuse operators from failing to have gas available for real-time dispatch—flexibility not afforded to renewable resources. Additionally, ISO-NE's phased out Minimum Offer Price Rule (MOPR) forced renewables to bid at artificially high prices so more expensive gas units could clear the auction and remain in the market. Encouragingly—if later than necessary—ISO-NE has taken steps to address these unfair and unrealistic practices, including phasing out the MOPR and reevaluating methodology for accrediting resources.

New resource accreditation is an opportunity to meaningfully incorporate stakeholder feedback, address gas plants' over-accreditation, and ensure solar photovoltaic, storage, and demand response are not under-accredited or subject to other market barriers. The Resource Capacity Accreditation (RCA) project is currently developing methodology that will better capture gas capacity constraints by taking into consideration resources' operating characteristics including maximum capability, intermittency, fuel limitations, and forced outages.[32] However, concerns persist around the transparency, comprehensibility, and calculation of accreditation values. ISO-NE should expand the scope of RCA to better reflect gas plant performance, and ensure accreditation values adequately incentivize the resources states policies demand to participate in the capacity markets.[33]

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[30] *Calling into Question the Reliability of Gas Power Plants*, Union of Concerned Scientists (Jan. 2024), https://www.ucsusa.org/sites/default/files/2024-01/Gas%20Malfunction_brief_1.8.pdf.

[31] Bruce Mohl, *Grid operator dials back electricity concerns*, CommonWealth Beacon (June 20, 2023), https://commonwealthbeacon.org/energy/grid-operator-dials-back-electricity-concerns/; Vamsi Chadalavada & Stephen George, *Extreme Weather Risks to ISO-NE, Presentation of the EPRI Study* (June 20, 2023), https://www.iso-ne.com/static-assets/documents/2023/06/ad22-9_winter_gas_electric_forum_extreme_weather.pdf.

[32] Resource Capacity Accreditation in the Forward Capacity Market Key Project, ISO-NE https://www.iso-ne.com/committees/key-projects/resource-capacity-accreditation-in-the-fcm; Dane Schiro, Resource Capacity Accreditation in the Forward Capacity Market, NEPOOL Markets Committee (March 12-13), https://www.iso-ne.com/static-assets/documents/100009/a03b_mc_2024_03_12_13_impact_analysis_sensitivity_results.pdf.

[33] *The Impact of Resource Inflexibility on Capacity Accreditation in New England,* Synapse Energy Economics, (March 2024), https://www.sierraclub.org/sites/www.sierraclub.org/files/2023-03/Capacity%20Accreditation%20for%20Inflexible%20Resources%202023_03_07%20%281%29.pdf

While the RCA is on track to finalize by the fall, ISO-NE has more recently proposed moving from its current capacity market structure to a "prompt/seasonal" model and integrating a market constraint approach.[34] The market constraint approach would account for issues of fuel availability, and the prompt/seasonal model would ensure the capacity auction takes place closer to the delivery period instead of three years away and addresses the distinct reliability challenges of winter and summer.[35] If ISO-NE's request for a delay to pursue this proposal is approved by FERC, it will have an additional two years to make changes.[36]

Finally, in line with improved market rules, ISO-NE must not employ any other expensive mechanisms to manage winter energy adequacy concerns that subsidize fossil fuels out of consumers' pockets. The Inventoried Energy Program, first adopted in 2019 and re-approved last August, authorized up to $812 million to pay mostly fossil plants to store fuel for two winters out of consumers' pockets.[37] The Mystic Cost of Service Agreement, which started June 2022, also takes ratepayer money to keep the Mystic generating plant online and has cost consumers more than $660 million as of January 2024.[38] If any such programs are proposed in the future, they need to be based on clear, cohesive, and transparent evidence that they are truly necessary.

Our Northeast Grid Future

The Northeast energy grid is about more than technical markets—it is about the people it serves. ISO-NE must address issues of governance with increased accountability and transparency, strategically build out transmission capacity, and reshape the ISO-NE market structures that have a history of unfairly subsidizing existing fossil fuel generation. Ultimately, continued reliance on fossil fuels creates both long-term climate and economic risks and short-term public health risks for frontline communities. We must look towards a clean, affordable, and reliable energy future—built with good-paying union jobs that delivers a livable future for all. We appreciate your attention to this matter.

To help us better understand how ISO-NE is addressing our concerns, please respond to the following questions in writing by May 10, 2024:

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[34] Jon Lamson, *NEPOOL PC Supports Additional Delay of FCA 19*, RTO Insider (April 7, 2024) https://www.rtoinsider.com/75605-nepool-pc-additional-delay-fca-19/

[35] *See* Capacity Market Reforms to Accommodate the Energy Transition While Maintaining Resource Adequacy, Docket No. ER24-___-000, FERC (Oct. 13, 2023), https://www.pjm.com/-/media/documents/ferc/filings/2023/20231013-er24-99-000.ashx.

[36] Revisions to ISO New England Transmission, Markets and Services Tariff to Further Delay the Nineteenth Forward Capacity Auction and Related Capacity Market Activities, Docket No. ER24-_____-000, ISO-NE and NEPOOL (April 5, 2024), https://www.iso-ne.com/static-assets/documents/100010/rev_to_further_delay_19th_fca.pdf; *ISO-NE recommends capacity market reforms*, ISO Newswire (Feb. 8 2024), https://isonewswire.com/2024/02/08/iso-ne-recommends-capacity-market-reforms/.

[37] *Order Accepting Tariff Revisions*, 184 FERC ¶ 61,082 (Aug. 4, 2023), https://www.iso-ne.com/static-assets/documents/2023/08/er23-1588-000.pdf.

[38] Mystic Cost of Service Preliminary Report, ISO-NE (Jan. 2024), https://www.iso-ne.com/static-assets/documents/100008/mystic_cos_prelim_01_2024.pdf.

1. Will ISO-NE commit to transparent and accessible governance through open and responsive board meetings, diverse Board representation, and more proactive community engagement? If so, how is ISO-NE moving forward on these elements of governance?

2. Will ISO-NE continue to improve upon its long-term transmission planning by including a more complete list of benefits, ensuring adequate evaluation and use of grid-enhancing technologies, and continuously improving the interconnection process? If so, how?

3. How is ISO-NE working with states and other stakeholders to address market rules and out-of-market mechanisms that create an unfair advantage for oil and gas? What structures and frameworks are in place to determine if market rules and out-of-market mechanisms are necessary and based on clear, cohesive, and transparent evidence?

4. How is ISO-NE ensuring market rules reduce barriers to participation by renewable resources, distributed energy, demand response, and energy storage?

CC:
Cheryl LaFleur
Chair, Board of Directors
ISO New England

Sarah Bresolin
Chair, Participants Committee
NEPOOL

Sincerely,

Edward J. Markey
United States Senator

Sheldon Whitehouse
United States Senator

Elizabeth Warren
United States Senator

Bernard Sanders
United States Senator