

August 17, 2022

Partners:

350 Mass
350 New Hampshire
Acadia Center
The Alliance for Business Leadership
Association to Preserve Cape Cod
Bristol Community College
Ceres
Clean Energy NH
Clean Water Action
Climate XChange
CT League of Conservation Voters
Elders Climate Action - MA
Environment America
Environmental League of MA
Green Energy Consumers Alliance
Health Care Without Harm
IBEW Local 104
League of Conservation Voters
Maine Audubon
Maine Climate Action Now
Maine Conservation Voters
Mass Audubon
National Wildlife Federation
Natural Resources Council of Maine
New England Aquarium
PowerOptions
Revision Energy
Salem Alliance for the Environment
Save the Sound
Second Nature
Sierra Club
VHB
VT Natural Resources Council

Members:

Amalgamated Bank
Atrevida Science
Bemis
Ben Hillman & Company
Berkshire Bank
Black Economic Council of MA
Boston Energy Wind Power Services
Cape Cod 5
Cape Cod Climate Change Collab.

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

**RE: Docket No. RM21-17-000, Notice of Proposed Rulemaking,
*Building for the Future Through Electric Regional Transmission
Planning and Cost Allocation and Generator Interconnection***

Dear Secretary Bose,

New England for Offshore Wind appreciates the opportunity to submit comments on the Federal Energy Regulatory Commission's (Commission's) Notice of Proposed Rulemaking (NOPR), *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, which was published in the Federal Register on April 21, 2022. New England for Offshore Wind is a broad-based coalition of over 100 organizations that aims to drive regional collaboration and increased commitments to responsibly developed offshore wind in New England.

As a coalition of businesses and business associations, environmental and justice organizations, academic institutions, and labor unions with significant operations in New England, we understand the critical need for transmission planning reform and strongly support the trajectory of the NOPR. Included in this comment letter are recommendations on long-term planning, including requirements for scenario-based planning and consideration of public policy; interregional planning; cost allocation; and stakeholder engagement. The modernization of transmission planning is critical to ensuring that New England's transmission grid can reap the benefits of new generation resources, including offshore wind,¹ that are increasingly available as a result of public policy requirements and advancements in technologies, and in response to market trends including electrification and the cost valuation of externalities such as pollution. These reforms will help unlock economies of scale, lower prices, improve reliability, and enable the increased deployment and integration of clean energy resources including offshore wind while minimizing environmental and community impacts.

¹ The January 2022 ISO-NE interconnection queue shows 60% of proposals from offshore wind. <https://www.iso-ne.com/about/key-stats/resource-mix>.

Members (cont'd):

Climate Action Now, Western MA
Climate Reality Project – MA Southcoast
CT Sustainable Business Council
E. Hampton Clean Energy Task Force
Eastern Bank
Eastern CT Green Action
Energy Efficiency Associates, LLC
Environmental Council of RI
eWind Consultants
Faith Communities Enviro. Network
Flashover LLC
Green Newton
Greenwater Marine Sciences Offshore
Hollis Line Machine
Iron Workers Local 7
IUPAT DCI I
Keuka Energy
Lautec US Inc.
League of Women Voters MA
MA AFL-CIO
MassMEP
MCAN
Mills Public Relations
MOCA Westport
Mothers Out Front
Muggventures
Nashoba Conservation Trust
New Hampshire Audubon
NH Businesses for Social Responsibility
NH Citizens for Progress
NH EEC Network
People's Action for Clean Energy
Philip Conkling & Associates
POWER-US | MA
Rangel Renewables
Rhode Island Building Trades
Robert E Derecktor Inc.
Seacoast Anti-Pollution League
Self-Reliance
Skunk Works Fund
Turnstone
University of Maine
Vineyard Power Cooperative Inc.

I. Long-Term Planning

We support the Commission's proposed reforms to the transmission planning process that would drive forward-looking, long-term planning that encourages regional collaboration. We agree with the commission that regional planning that looks no less than 20 years into the future is sufficiently long-term and forward-looking. We also support the Commission's proposal to require reassessing and revising such long-term plans on a frequency of no less than three years. This frequency is necessary and advisable, given the speed at which the industry and the resource mix is transforming.

a. Scenario-Based Planning

We appreciate the Commission's proposal to require scenario-based planning, with the use of at least four Long-Term Scenarios to identify transmission needs driven by changes in the resource mix. The proposed requirement for planning to include at least one low-frequency, high-impact scenario such as extreme weather is prudent, given the increased likelihood of extreme weather events due to climate change. While the Commission proposes to require the use of scenarios in long-term planning, the NOPR does not propose to require any additional specifics in the selection of these scenarios. We encourage FERC to require a minimum set of factors that must be included in scenario-based planning to maximize the effectiveness and utility of the process and to ensure just and reasonable outcomes. We also encourage the Commission to require plans to give preference to solutions that hedge against and perform well under a range of scenarios and not just a single scenario.

b. Consideration of Public Policy and Resource Mix

We also strongly support the Commission's proposal to require public utility transmission providers to "incorporate state or federal laws or regulations...that affect the future resource mix and demand into the development of Long-Term Scenarios."² Using state policy requirements and the expected resource mix as key inputs in long-term planning processes will ensure that transmission is being planned for the grid of the future – one that integrates increasing levels of renewable energy such as offshore wind.

In New England, each of the six states has a goal to reduce greenhouse gas emissions by at least 80% by 2050. In five of the six states, those emissions reductions are mandated by law, and three of them have also enacted 100%

² P 70 of the NOPR



clean or renewable electricity mandates.³ These policies for greenhouse gas emissions reductions are economy-wide and are thus driving reductions across all sectors of the economy, with an emphasis on electrification. This electrification will dramatically increase electricity load and require massive amounts of clean energy. State and independent analyses have detailed the critical role that offshore wind will play on our shared grid in the coming decades to enable the achievement of these policy requirements. Offshore wind offers New England a pivotal new source of energy and is likely to be the linchpin of the region's clean energy transition. In recognition of this, several New England states have mandated offshore wind procurements and signed contracts with developers for offshore wind power (see tables I.0 and I.1 below). According to several analyses, New England will need anywhere from 30⁴-43⁵ GW of offshore wind to reach 80% emissions reductions by 2050, and more could be needed to reach net zero. Driven by offshore wind, this transition will provide high-quality job opportunities for New England's unionized workforce and will moreover reduce overall pollution and lead to improved air quality and health outcomes, especially in our most vulnerable communities.

Table I.0 – New England Offshore Wind Procurement Mandates		
State	Targets (MW)	Required Contract Date
CT	2,000 MW	By 2030
ME	~156 MW	TBD ⁶
MA	5,600 MW	By 2027
RI	1,030 MW	By 2023
TOTAL	8,786 MW	

Table I.1 – New England State Offshore Wind Contracts			
State	Project Name	Nameplate Capacity	Contract Date
MA	Vineyard Wind I	800 MW	July 2018
RI	Revolution Wind	400 MW	May 2018
CT	Revolution Wind	304 MW	June 2018
MA	Mayflower Wind	804 MW	October 2019
ME	New England Aqua Ventus I	11 MW	November 2019
CT	Park City Wind	804 MW	December 2019
MA	Commonwealth Wind	1,232 MW	April 2022, <i>pending DPU approval</i>
MA	Mayflower Wind (Residual)	400 MW	April 2022, <i>pending DPU approval</i>

While we support the Commission's proposal to require scenario-based planning that considers state law for public policy transmission planning, we are disappointed that the Commission does not propose

³ "The New England states' frameworks for reducing greenhouse gas emissions and increasing renewable energy continue to evolve." ISO Newswire, February 25, 2022, <https://isonewswire.com/2022/02/25/the-new-england-states-frameworks-for-reducing-greenhouse-gas-emissions-and-increasing-renewable-energy-continue-to-evolve/>; An Act Concerning Climate Change Mitigation 2022 (CT), S.B. No. 10, s. 1.3, <https://cga.ct.gov/2022/ACT/PA/PDF/2022PA-00005-R00SB-00010-PA.PDF>; Act on Climate 2021 (RI), Title 42, Chapter 6.2-2, <http://webserver.rilin.state.ri.us/Statutes/TITLE42/42-6.2/42-6.2-2.HTM>; An Act Relating to Public Utilities and Carriers-Renewable Energy 2022 (RI), H 7277 sub A, s. 1, <http://webserver.rilin.state.ri.us/BillText/BillText22/HouseText22/H7277A.pdf>.

⁴ "Massachusetts 2050 Decarbonization Roadmap," Massachusetts Executive Office of Energy and Environmental Affairs and The Cadmus Group, <https://www.mass.gov/doc/ma-2050-decarbonization-roadmap/download>.

⁵ Weiss, Jürgen and Hagerty, John Michael, "Achieving 80% GHG Reduction in New England by 2050," The Brattle Group, slide 11, https://www.brattle.com/wp-content/uploads/2021/05/17233_achieving_80_percent_ghg_reduction_in_new_england_by_20150_september_2019.pdf

⁶ Pending federal approval of 144 MW offshore wind research array proposed by the state of Maine.



to integrate reliability and economic regional transmission planning processes together with public policy planning. Cost-effective and well-optimized transmission must be planned to meet all three of these needs, not one in isolation of the other two. The NOPR's oversight on this is problematic and would create artificial silos for reliability, economic, and public policy benefits. By requiring scenarios and public policy to only be considered for long-term planning, it creates the risk that scenario-based planning would only be a box to be checked without any real-world impacts. To the extent it results in three separate types of planning processes, it will drive up costs, increase impacts on communities and the environment, and slow progress in reaching each of the three types of goals. To ensure just and reasonable results, the planning process for transmission must work to optimize outcomes for public policies, including greenhouse gas reduction and environmental justice, while also providing economic and reliability benefits. This holistic approach will ensure the appropriate integration of all three goals in planning, while reducing overall impacts on communities and the environment.

II. Interregional Planning

The Commission does not propose reforms to interregional transmission planning and related cost allocation issues beyond requiring regional planning processes to identify interregional projects that may be more efficient or cost-effective solutions. We agree with the Commission that a separate rulemaking will be needed to address this issue. Such a rulemaking should consider interregional planning across Regional Transmission Organizations (RTOs) in the US as well as with neighboring regions of Canada. We also urge the Commission to provide clarity around jurisdiction for planning transmission in federal waters in an additional rulemaking that addresses interregional planning. Given New England's proximity to neighboring Regional Transmission Organizations (RTOs) such as NYISO and PJM and the planned offshore wind development in those adjacent regions, interregional planning and collaboration to address the needs of multiple regions may be necessary and beneficial. An interregional, offshore planned approach could minimize costs to ratepayers, increase reliability, and minimize impacts to the environment and communities by reducing the amount of new transmission infrastructure needed.⁷ Failure to plan and develop a shared offshore transmission grid in a timely manner for the next phase of offshore wind projects will result not only in increased costs, but also force major land-based transmission system upgrades, including in areas where there are sensitive, biologically diverse habitats and disadvantaged communities.

III. Cost Allocation and Benefits

In the NOPR, the Commission proposes to require public utility transmission providers to adopt either “(1) a Long-Term Regional Transmission Cost Allocation Method to allocate the costs of Long-Term Regional Transmission Facilities, (2) a State Agreement Process by which one or more relevant state entities may voluntarily agree to a cost allocation method, or (3) a combination thereof.”⁸ We support the Commission's proposal to seek agreement for these methods from the states, however, the Commission must define what constitutes “agreement.” It is important that such agreement should not

⁷ Pfeifenberger, Johannes, “Offshore Wind Transmission: An Analysis of New England and New York Offshore Wind Integration, *The Brattle Group*, https://brattlefiles.blob.core.windows.net/files/21229_offshore_wind_transmission_-_an_analysis_of_options_for_new_england_and_new_york_offshore_wind_integration.pdf

⁸ NOPR at P 302



be required to be unanimous so that any one state or small subset of states cannot delay cost allocation by withholding agreement. Requiring agreement of a majority of the states would be consistent with existing processes. For example, the Regional State Commission in New England – the New England States Committee on Electricity (NESCOE) – only requires the agreement of a majority of the states while providing state input on ISO-NE proposals, and there have been a few recent instances in which NESCOE has taken a position without unanimity.⁹ We also agree with the Commission’s proposal to prescribe a 90-day time period for state-negotiated cost allocation. Setting a deadline is essential to preventing the delay of transmission development due to disagreement about cost responsibility.

The Commission enumerates a list of twelve quantifiable benefits of regional transmission in the NOPR, including benefits related to cost reductions and system reliability and resilience. The Commission does not, however, require these benefits to be considered or for costs to be allocated according to those benefits. As we stated in our ANOPR Comments, these broader benefits should be taken into account for analyses for cost responsibility. The Commission should require a minimum list of benefits to be considered for planning and cost allocation and should promote a broad and forward-looking allocation of these benefits to all beneficiaries of a project, not just beneficiaries within a given state or utility territory. Analyses for cost responsibility for transmission infrastructure should also take climate change and public health into account.

IV. Stakeholder Engagement and Transparency

To evolve the electric system, improve reliability, and maintain public health in the face of a climate crisis, the United States needs to rapidly and substantially expand transmission infrastructure.¹⁰ This expansion and the growth of renewable resources including offshore wind could create hundreds of thousands of direct and indirect jobs in the coming decades.¹¹ However, without a transparent and inclusive planning process, regional planning efforts will be at cross-purposes with state policy on environmental justice and the reduction of environmental and community impacts. It will inevitably result in projects that fail to meet the needs of communities and are therefore rejected by siting boards.

Energy infrastructure siting including transmission is of particular concern to environmental justice communities in New England. The expansion of responsibly developed offshore wind and transmission could address historical environmental and economic justice issues through project labor or community benefits agreements by driving the creation of high-quality, family-sustaining jobs and the closure of dirty fossil fuel power plants often located in low-income communities and communities of color. To ensure that all benefits are maximized and appropriate alternatives are considered early before plans are locked in, early stakeholder engagement is essential.

⁹ See Memorandum of Understanding among ISO-New England, Inc, the New England Power Pool, and New England States Committee on Electricity, LLC, Section 2(a), available at https://www.iso-ne.com/static-assets/documents/regulatory/part_agree/mou_final.pdf.

¹⁰ See, e.g., “How are we going to build all that clean energy infrastructure?” *Clean Air Task Force and Niskanen Center*, August 2021, <https://www.catf.us/2021/08/new-report-electricity-transmission>.

¹¹ The White House Briefing Room, “FACT SHEET: Biden Administration Jumpstarts Offshore Wind Energy Projects to Create Jobs”, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-biden-administration-jumpstarts-offshore-wind-energy-projects-to-create-jobs/>



In the NOPR, the Commission proposes a number of requirements for transparency in regional transmission planning, which we support. These include requiring public utility transmission providers to enhance transparency on assumptions used in the planning process; local transmission needs identified in that process; and the potential regional transmission that will be evaluated to address those needs.¹² However, a planning process for transmission should also include transparency on the evaluation of alternative options which could optimize the performance of renewable energy, as well as a justification of investment decisions and how they compare to the alternatives – including a no action alternative to better understand climate change, resilience, and community impacts.

We appreciate the proposed requirements around stakeholder engagement contained in the NOPR, however, we note that some RTOs including ISO-New England (ISO-NE) have formal stakeholder engagement processes (i.e. with NEPOOL and NESCOE) that are not open to the public. We urge the Commission to utilize the new Office of Public Participation to foster a robust and inclusive stakeholder engagement process at the regional level to ensure that communities are aware and involved in these proceedings. In particular, more needs to be done to ensure the participation and engagement of disadvantaged communities and consultation of tribal nations that have borne the brunt of many past energy and industrial impacts. The transmission planning process should also include an assessment of cumulative impacts to ensure equitable siting. Careful and transparent planning is essential to ensuring the effective expansion of transmission for responsibly developed offshore wind in our region.

Thank you for the opportunity to comment in this rulemaking proceeding on the important subject of transmission planning reform. We strongly support the Commission's efforts to evolve transmission planning and look forward to continued opportunities to engage at the Commission on these issues. It is critical to ensure the rapid and efficient integration of clean energy including offshore wind that addresses the existential threat of climate change and keeps our grid, our environment, and our communities strong and safe.

Sincerely,

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¹² NOPR at P 400

