

## Draft 2025 Longer-Term Transmission Planning RFP: Comment Form

Please provide comments on the draft 2025 Longer-Term Transmission Planning RFP in the following table. ISO-NE will publish all responses on the [Longer-Term Transmission Studies](#), [Competitive Transmission](#), and [Planning Advisory Committee](#) pages of its website.

Document (Part 1, Part 1 Appendix A, or Part 2)	Page Number	Section/ Question Number	Comment
Appendix A		Introduction	<p>The lack of a clear rubric for grading each of the evaluation factors in Appendix A is cause for concern, given the possibility that if two or more Longer Term Proposals (LTPs) may be tied or have a BCR higher than 1, it will not be clear how their A, B, and C evaluation factors would be weighed accordingly to choose between the proposals. The concern is that the absence of an objective rubric invites more subjective evaluation of each factor, and will not provide clarity regarding how each factor had been graded and differentiated among LTPs. As such, we recommend that the RFP include a defined rubric for grading each of the A, B, and C evaluation factors to make explicit the determination made with respect to each such evaluation factor. We would also request the ISO amend Section 4.5 under Part 1 of the RFP accordingly.</p> <p>In addition, NESCOE emphasized in their RFP outline the importance of LTPs going above the minimum to deliver on benefits to ratepayers. It has not been made clear in Appendix A or the RFP how LTPs exceeding the minimum requirements of the RFP would be evaluated comparatively. For the final RFP, we encourage the definition and expansions of evaluation factors to award QTPS Respondents additional points for LTPs that deliver extra benefits to ratepayers.</p>
Appendix A		A Factors	<p>While the “A Factors—Highest Priority: potential siting/permitting issues or delays,” is the heading used in the RFP outline, it is missing the critical subheading of “consideration of whether bidder has demonstrated a clear plan to get support through engagement – assess experience, engagement strategy.” We strongly urge that the final RFP reinstate this provision and mandate an evaluation of community engagement strategy and planning under “siting and permitting” in Appendix A. It is also important for this requirement to be reflected in the RFP application itself, urging and allowing applicants to upload their community engagement plan, and reflecting that it is a priority in RFP evaluation. Doing so would also necessarily align the requirements of the RFP with the ISO’s future FERC Order 1920 compliance filing.</p>
Appendix A		A Factors	<p>Under the A Factors—Highest Priority: “future expandability”, we encourage the addition of specific references, including but not limited to: future interregional expansion/connections, general offshore wind expandability/mesh readiness, interoperability requirements for AC and DC solutions that would make substations within the same offshore wind area compatible with each other, onshore wind and other land-based renewables expandability, interconnection improvements, and potential for and compatibility with future upgrades. We also note that in Part 2 of the RFP, the definition of future expandability is described exclusively as potential expansions of physical placements within a right of way or at a substation; we encourage criteria to push past physical expandability exclusively to include</p>

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			hardware and software solutions, modular design, and other equipment that would increase the capacity of the proposed solution.
Appendix A		B Factors	Under the B Factors--“impact on interface limits,” we encourage an explicit reference to interfaces between New England and neighboring balancing authorities in Canada (as well as interfaces with New York, if/as applicable), and criteria regarding how those cross-border transfer capabilities could be considered for a positive evaluation in this RFP.
Part 1		1.4	As a general comment related to the timeline of the LTTP process, we are disappointed that the comment period for this RFP was limited to one week. Given the scope of the RFP and the full year that is planned for the ISO to review LTPs, we believe it is reasonable to expect a longer comment period to ensure adequate opportunity for stakeholder review and engagement. In addition, we encourage the ISO to accelerate the evaluation period as well if the number of submitted LTPs is fewer than expected, and/or to release the evaluation results should a selection be made in less than the year allotted for evaluation.
Part 1		4.1, Longer Term Proposals	Given that the RFP encourages joint proposals, we request the ISO, throughout this section and the balance of the RFP where applicable, remind applicants that they can jointly apply to fulfill the criteria of the RFP and that such joint filing is a Category C Factor—third highest priority. This way, LTPs can have more diverse benefits for ratepayers and be more expansive.
Part 1		4.5, Identification of the BCR	It is unclear why, in the case of the 30-day timeline after the ISO posting of the Longer-Term Transmission Solution (LTTS), NESCOE’s only other option other than to terminate the process if they don’t like the LTTS is to specify an alternative allocation for recovery of incremental costs that doesn’t address reliability or economic needs. It would be helpful to have more stakeholder input at this stage--aside from the PAC decision--and provide more flexibility on the NESCOE response (e.g., more tangible feedback on the selected LTTS). Under Section 4.6, it seems that NESCOE can identify up to three longer term proposals for additional analysis under the failed BCR threshold scenario, and we would suggest more flexibility for analysis requests under the positive BCR threshold scenario as well, in addition to allowing NESCOE to comment on the reliability and economic needs presented in the chosen solution.
Part 2		7.13, Hourly Ratings Based on DLR	In accordance with ‘Advanced Transmission Technologies’ being listed as a Category C priority in Appendix A, we request that the final draft RFP to be more expansive and ask for more information beyond and in addition to Dynamic Line Rating (DLR) information. As such, we request that Section 7 include an option to provide information about other ATT solutions, including but not limited to proposed

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		Equipment; also 8.16	reconductoring, advanced power flow control, and topology optimization investments, if/as applicable; as well as to provide more clarity on how the ATT factor will be evaluated under 'financial' and other benefits/scoring. Further, while the RFP specifies that 2019 weather data will be “used in the calculation of financial benefits for the RFP”, it is unclear what this financial methodology or calculation entails. It is also not clear why weather data from 2019 is requested, as opposed to more recent weather data or averaged/forward-looking models. We encourage alignment, instead, with PEAT and REST weather modeling inputs and for the ISO to request or use future-forecasting of weather conditions to detail the capacity of DLR/ATT deployment.
Part 2		14.3, Route and Site Evaluation	<p>In accordance with the A Factors—Highest Priority regarding community engagement, we recommend amending this section to require applicants to upload their community engagement plan and make clear the requirements they’ve met. We note that at minimum, this RFP should remind applicants that within FERC Order 1920, the basic requirement for engagement (that can be emulated here, with LTTP taking inspiration from FERC’s Order 1920) is that providers must 1) post the publicly available information related to their project on a clear website and 2) include at least three publicly noticed stakeholder meetings in the affected area. Additionally, stakeholder plans should be mandated to: 1) ensure that community members are made aware of the proposed projects that may affect them; (2) provide meaningful opportunities for community members and organizations to get involved, including opportunities for the public to provide written and oral comments; and (3) provide resources and technical assistance regarding the proposed projects and potential impacts, including plain-language summaries, and translated materials as needed.</p> <p>To go beyond this, we encourage ISO to name and favorably evaluate other best practices, such as: 1) multi-lingual access and translation of materials to different languages; 2) micro-siting adaptations such as route adjustments to adapt to stakeholder feedback as needed; 3) hiring a local trusted messenger/well known leader in the community to help with the project; 4) an engagement plan that allows communities to see clear benefits and mitigation from the project; 5) negotiation of benefits in tandem with taxes, local revenue numbers, and benefits/requests that come from specific community needs; 6) documenting stakeholder input thoroughly, how the feedback was taken, and the use of metrics for community benefit goals.</p> <p>We also encourage the ISO to reference 1)The community benefits transmission grants guidance found here at the Department of Energy (<a href="#">GRIP Program Community Benefits Plan   Department of Energy</a> ) and 2) Massachusetts’ RFP offshore wind solicitation (<a href="https://macleanenergy.com/wp-content/uploads/2023/08/83c-rd4-rfp-8.30.2023.pdf">https://macleanenergy.com/wp-content/uploads/2023/08/83c-rd4-rfp-8.30.2023.pdf</a>) that evaluated projects to the extent to which they would “mitigate, minimize, and avoid environmental and socioeconomic impacts, including through</p>

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			<p>meaningful consultation with impacted environmental and socioeconomic stakeholders, including federally recognized and state acknowledged tribes” and the extent to which they “demonstrate[d] that [the project] avoids, minimizes, or mitigates, to the maximum extent practicable, negative impacts on Environmental Justice Populations and host communities, and extent to which the project directs positive benefits to those communities.” Appendix J of the Mass. 83civ solicitation included additional details on socioeconomic impact criteria, specifying that a project would be evaluated on the extent to which it (1) identifies potentially impacted EJ communities and Tribes; (2) demonstrates plans or investments to avoid, minimize, and mitigate environmental burdens and other negative impacts on host communities; (3) includes plans to engage with affected communities through public involvement and best practices; (4) includes plans to incorporate input from impacted host communities, especially EJ communities and tribes, into decision-making regarding project siting and development; and (5) includes plans to direct positive benefits from the project to EJ communities and a strategy plan to track and report on the status of EJ impacts and meaningful engagement.</p> <p>The Final LTTP Phase 2 RFP should adopt a similar approach for evaluating community impacts and remind QTPS’s that they will be scored even more favorably if they go above and beyond basic requirements of engagement for the project. <i>If the community engagement aspects that NESCOE requested are not included in the final RFP draft, it will be critical for the ISO to address publicly how this requirement will be fulfilled.</i></p> <p>And: 3) While states vary in their identification of EJ communities, we encourage the ISO to display this resource – <a href="#">EJScreen</a> -- to project proponents and stakeholders to assist them in identifying EJ communities that may be affected by their proposed project.</p>
Part 2		14.4, Right of Way	<p>The Right of Way section should be amended to add a subpart (14.4.4) that would allow applicants to list their in-service date, in order to give preference for faster Right of Way in-service project dates to move the process forward more quickly. Additionally, respondents generally (in this section and Question 6.1 in Part 2) should be encouraged to use existing rights-of-way such as those for existing transmission lines, highways, railways, and those for brownfield siting. This would also tie in under Appendix A Factor priority for ‘siting/permitting issues and delays’ evaluation, since adopting these reforms would streamline permitting and should give applicants additional points/more favorable consideration.</p>