

**To:** Al McBride, Vice President, System Planning, ISO New England, and Brent Oberlin, Executive Director, Transmission Planning, ISO New England

**From:** Claire Lang-Ree (NRDC), Cary Lynch (TNC), Nick Krakoff (CLF), Jolette Westbrook (EDF), Anya Poplavska (Acadia Center), Susan Muller (UCS), Ada Statler (Earthjustice), Rebecca Schultz (Natural Resources Council of Maine), and Amy Boyd Rabin (Environmental League of Massachusetts)

**Date:** April 10, 2025

**Re: Request for Community Engagement Plan Requirement in LTTP RFP**

The undersigned public interest organizations write to request that ISO New England (“ISO-NE”) require Qualified Transmission Project Sponsors (“QTPS”) Respondents<sup>1</sup> to submit a community engagement plan as part of the application for the Longer-Term Transmission Planning (“LTTP”) Request for Proposals (“RFP”).<sup>2</sup> Specifically, we propose the addition of a new subsection captioned “Community Engagement Plan” within Sections 1 through 17 of the RFP (e.g., within Section 14, “Scheduling and Real Estate”). We strongly support the LTTP RFP and appreciate ISO-NE’s inclusion of community engagement in Part 1, Appendix A as an Evaluation Factor,<sup>3</sup> but QTPS community engagement plans must be a requirement for all applicants and should be added to the questions included in Part 2. Specifically, ISO-NE should adopt language similar to the following excerpt in Part 2, as a new subsection within Sections 1 through 17:

**Question 14.X. – Provide a community engagement plan.**

Instructions	Response
<p>The response shall list every community which may be impacted by the Longer-Term Transmission Proposal. This includes geographic communities including local municipalities and Tribes, as well as communities defined by shared use of the geography. Respondents shall also provide a plan for community engagement, including but not limited to:</p> <ol style="list-style-type: none"><li>1. The plan to identify communities and Tribes that will be impacted by the Longer-Term Proposal, and, if applicable, efforts to respect Tribal sovereignty and the right of Tribes to engage in government-to-government consultation, and that conversations remain private;</li><li>2. The start date of planned engagement;</li><li>3. Description of the form of engagement (e.g., all meetings and written materials), with a three meeting minimum requirement, as well as a description of</li></ol>	<p>Written response example –</p> <ol style="list-style-type: none"><li>1. We will use the Environmental Protection Agency’s “EJSCREEN” tool and our proposed construction plans to identify impacted communities and Tribes. We will respect Tribal sovereignty and engage in confidential consultation if requested.</li><li>2. Our community engagement plan will begin April 2029, one year before construction.</li><li>3. We will hold three meetings with each of the identified impacted communities. There will be virtual and in-person participation options. At the meetings, we will lay out the full scope of the community engagement plan and seek community input for plan improvement. We will also discuss relevant cultural considerations and how we will ensure transparency of information to inform how</li></ol>

<sup>1</sup> All capitalized terms are assigned the meaning given to them in the referenced documents unless otherwise noted.

<sup>2</sup> ISO New England, Inc., 2025 Longer-Term Transmission Planning RFP (March 31, 2025). <https://www.iso-ne.com/system-planning/transmission-planning/longer-term-transmission-studies/>

<sup>3</sup> ISO New England, Inc., Request for Proposal Longer-Term Transmission Upgrade (LTTU) Part 1 - Appendix A, Evaluation Factors (Mar. 31, 2025) at 1. <https://www.iso-ne.com/system-planning/transmission-planning/longer-term-transmission-studies/>

<p>how the engagement methods are tailored to address regional and local issues, cultures and relationships including the languages that the written materials and meetings will be in;</p> <ol style="list-style-type: none"> <li>4. Description of how and when notice of scheduled meetings will be provided, including the physical and online notice locations and the timing of notice in advance of meetings, to ensure that most community members can participate;</li> <li>5. Description of efforts taken to ensure that technical material will be made accessible;</li> <li>6. The plan for keeping the community updated on project developments, including any QTPS point of contact available for the community to communicate with;</li> <li>7. Description of how communities will be encouraged to participate and how community input will be considered, including any dispute resolution frameworks;</li> <li>8. Description of if or how the QTPS will use the engagement framework to discuss and develop community benefit mechanisms (this includes providing information sessions on community benefits, as well as providing third-party technical or legal services to help in the development and negotiations of a benefit mechanism); and</li> <li>9. Efforts to monitor the effectiveness of this plan, actively seek feedback from stakeholders and the public, and modify engagement processes as necessary to ensure they remain relevant and effective.</li> </ol>	<p>we are considering input through our intake form (described in #7).</p> <ol style="list-style-type: none"> <li>4. Notice of the meetings will be given at least 30 days in advance of each meeting, posted on our website in the most prevalent languages spoken in the impacted community, and provided at multiple physical and online locations. We will request that the city or town of the impacted community post meeting and other relevant notices on its webpage.</li> <li>5. Plain-language fact sheets will be available online prior to the meetings so that participants can begin to acquaint themselves with the project details.</li> <li>6. We will create an email list that community members can register for to receive project updates via email. We will also provide contact information for our Community Liaison who can be reached via phone or email.</li> <li>7. We will provide a website where the community can continuously provide feedback through a simple intake form and monitor route changes in real time. We will also hire a dedicated Community Liaison to address questions and concerns before, during, and at least 60 days after construction. We will hire a translator for that community's preferred language(s) other than English.</li> <li>8. We will discuss the possibility of a community benefit agreement and what technical or other third-party resources, we can provide to ensure that a meaningful agreement is developed.</li> <li>9. Our Community Liaison will routinely take and implement feedback from the public about the structure and format of engagement.</li> </ol>
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Community engagement is essential to gain support for and successfully develop transmission projects. Community opposition to transmission projects has contributed to nearly one-third of U.S. transmission project delays or cancellations.<sup>4</sup> Indeed, the New England region has seen firsthand the impacts of community opposition to large transmission projects with the New England Clean Energy

<sup>4</sup> Baranoff, Olga and Norris, Zachary, "A closer look at the role of litigation and opposition in transmission projects undergoing federal permitting," *Niskanen Center*, (Mar. 4, 2024) <https://www.niskanencenter.org/a-closer-look-at-the-role-of-litigation-and-opposition-in-transmission-projects-undergoing-federal-permitting/>

Connect project, which faced monumental delays.<sup>5</sup> A comprehensive community engagement plan is necessary to ensure that impacted communities are treated equitably and are consulted early and often about projects that may impact them, to minimize the risk of exacerbating environmental injustices, to demonstrate the need for the project and its route and design and, ultimately to build community support for the project.

Without requiring applicants submit a comprehensive community engagement plan in Part 2 of the RFP, ISO-NE heightens the risk that the selected project will be delayed or cancelled. Requiring QTPS Respondents to submit community engagement plans with their applications also ensures uniformity among applications for fair evaluation. In the absence of a requirement, applicants will be left to choose whether to submit a community engagement under the ‘optional’ section, leading to proposal disparities.

The undersigned organizations repeatedly raised this request with ISO-NE through the feedback on the draft RFP,<sup>6</sup> as well as in comments to the New England States Committee on Electricity (“NESCOE”) addressing the initial RFP outline, but ultimately these comments were not incorporated into the final RFP. We raise this request again because community engagement is essential to ensure the selection of a successful Longer-Term Transmission project that will serve New England for decades to come, and because it was a key priority for NESCOE in the final request for an RFP.<sup>7</sup>

To minimize potential delay to the LTTP process, the undersigned organizations request that ISO-NE address this request by incorporating the language listed above into Part 2 of the RFP as soon as possible. Given that applicants still have months before applications are due, we believe it unlikely that this insertion will require delays to the LTTP process, but we welcome the opportunity to work with ISO-NE staff to minimize delays and pursue other avenues for ensuring community engagement for QTPS Respondents, including issuing a guidance or best practices document. If this insertion cannot be included in this initial procurement, we respectfully request that it be included in subsequent LTTP RFPs.

Sincerely,

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<sup>5</sup> Jon Lamson, “Massachusetts DPU Approves Price Increase for NECEC Line,” RTO Insider (Jan. 28, 2025), <https://www.rtoinsider.com/96767-mass-dpu-approves-price-increase-nec-ec-tx-line/>

<sup>6</sup> See Feedback on Draft 2025 Longer-Term Transmission Planning RFP from Acadia Center, Conservation Law Foundation, and (Mar. 25, 2025), <https://www.iso-ne.com/system-planning/transmission-planning/longer-term-transmission-studies/>

<sup>7</sup> New England States Committee on Electricity, Transmission Needs for a Longer-term Transmission Planning RFP (Dec. 13, 2025), [NESCOE RFP Final Request-f](#)

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