

Comments on the New England Energy Vision: Transmission Planning The Nature Conservancy in Connecticut

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- How would stakeholders like to participate in providing input into the long-term system plan?

Decisions made for the ISO-NE region are done by the 10-member ISO-NE Board, with input from the New England Power Pool (NEPOOL) participants, and the New England States Committee on Electricity (NESCOE). The summation of all 6 New England states energy commissioners views, priorities, and goals are given with 1 vote. This is unacceptable given that there are over 13 million people represented by one vote. The NEPOOL participants, 350 dispatchable generator contractors, have more power in the planning of the grid than the state elected and appointed officials who answer to the constituents that pay for the implementation and use of that grid.

In Connecticut, the Department of Energy and Environmental Protection (DEEP) creates plans and policy that is implemented by the Public Utilities Regulatory Authority (PURA). All plans/policy are public and involve input and discussion from stakeholders throughout the state. In theory, all voices are given the opportunity to contribute. However, given the structure of ISO-NE, plans constructed by the state are given very little value in planning at the regional level, even if these plans are in alignment with the other New England states.

Integrating state policy into grid planning will be difficult, but we strongly believe the ISO-NE governing body must attempt to coordinate better with the people they are serving. Stakeholders in Connecticut participate in public energy policy, but their voices are lost in the overall governance done by ISO-NE. We believe that the NESCOE must have more power in grid planning, and through NESCOE, stakeholders can more fully participate in long-term grid planning.

- How can stakeholder participation and/or the process be shaped to provide this input as efficiently as possible?

Committee formation within NESCOE may bring more diverse voices to discussions. ISO-NE committees should also be open to all stakeholders, which is not the case with MANY of the ISO-NE committees.

- Would stakeholders be comfortable with having the ISO use state-provided scenarios for the first round of the "2021 ISO-NE Long Term System Plan"?

This is a tricky question. On one hand, state scenarios are typically done by consultants with input from the state and surrounding states. Scenarios are constructed on the basis of state needs and policy goals, but input and models can differ. Consultants provide cost-benefit scenarios with a particular bias, which may skew results and create unrealistic recommendations. On the other hand, state-provided scenarios are the constructed and paid for by the state, hence they are likely tuned to state goals and potential policy.

We believe that giving ISO-NE state-provided scenarios is in the best interest of the state, and as such would recommend this option.

- Recognizing that the transmission plan will be improved through future iterations, would stakeholders prefer (1) a “fast” first round or (2) an approach where ISO take its time with the first round?

We believe that a “fast” first round approach is better than a “wait and see” approach. Grid operation and transmission planning is difficult and requires careful, thought-out planning. However, allowing ISO-NE to “take its time” does not take into account the urgency of the looming climate crisis and the need for clean energy. As stated in the above question, there will be updates and iterations throughout the implementation of the plan. Fast does not necessarily mean un-informed, and in fact many of the stakeholders in CT understand both the urgency and need to address transmission issues that will be hugely problematic if not dealt with now.

The region produces more than 11 GW annually. Of that 11 GW, 48.5% is from natural gas, 30.5% from nuclear, 11.4% from renewables, and 8.9% from hydro. Additionally, the region relies on 2.6 GW of imports from NY and Canadian provinces.

For the last decade, we’ve come to rely on natural gas, building new facilities and infrastructure across the region. This reliance has led to a low-cost, some-what reliable energy system. The problem with this is that natural gas is a fossil fuel, which is finite and is contributing to the global problem of anthropogenic climate change.

We must halt the buildout of natural gas generation as quickly as possible, which means planning must begin immediately. Stopping the paradigm of natural gas as the dominant source of energy should be prioritized and planning for distributed resources should be done immediately and not at the whim of ISO-NE.

Additionally, CT, RI, and MA have procured OSW energy but transmission constraints will be hugely problematic unless ISO-NE develops an “ocean grid” that will limit impact on the environment and aquatic species while increasing the potential for more OSW. This will help drive down costs associated with future OSW builds for the region and state. Given the importance of OSW for future winter energy needs and the time needed for citing, permitting, and construction of OSW, transmission planning cannot happen soon enough.

- Please build on the discussion at the technical forum regarding the savings involved in the early implementation of long-term requirements.

We agree with the conclusions given at the technical forum and would recommend that the cost-savings of transmission planning be stressed to stakeholders and in outreach activities.