

Equity, Justice, and the Regional Grid

Comments on the New England Energy Vision

May 13, 2021



Background

Acadia Center appreciates the opportunity to provide the following comments on the opportunity to center equity and environmental justice concerns and outcomes within the New England Energy Vision process. Acadia Center believes that all stakeholders and decision-makers have the moral responsibility to proactively ensure that communities who have borne the burden of an energy system that endangers public health and contributes to the climate crisis experience the benefits of the clean energy future. These voices have been excluded from decision-making processes, resulting in outcomes that are unjust and inequitable. In particular, the ISO-NE tariff, transmission planning process, and governance structure fail to assess and account for impacts on EJ communities and human health.

While Acadia Center strongly supports the overall goals of the New England Governors' Vision Statement, the statement and stakeholder engagement process did not initially include any meaningful mention of equity or environmental justice. Acadia Center joined other clean energy and climate advocacy organizations, along with community activists, to request additional forums and opportunities to engage in the process. Acadia Center notes that the participation in the one forum focused on Equity and Environmental Justice was very well attended, indicating the significant demand for such opportunities to engage in dialogue.

Overall recommendations

Many barriers exist today preventing full, diverse participation and equitable outcomes in the regional electricity market. State decision-makers and regional governance bodies must greatly expand their understanding of those barriers and address them through thoughtful engagement and meaningful consideration of the numerous ways that reforms can be developed, considered, and implemented. Here, Acadia Center briefly describes a sampling of some of those preferred approaches.¹

- Continue to convene accessible and transparent discussion forums focused on Equity and Environmental Justice with formats and on schedules that allow participation by a broad range of stakeholders, including members of EJ communities.
- Engage with equity, environmental justice, and consumer stakeholders at the start of and throughout the process of developing specific reform proposals for markets, transmission planning, and stakeholder participation processes and governance models.
- Adopt or adapt best practices and models from elsewhere created and endorsed by equity, environmental justice, and consumer-focused stakeholders that are producing successful outcomes for stakeholder engagement, governance, and policy design.
- Through an inclusive stakeholder process, develop and include measures of equity, environmental justice, and consumer impacts to create fully informed analyses of benefits and costs, forecasts, impact assessments, and evaluations of reformed market designs and transmission planning.

Expanding the Participation Model: Advisory Board

In the face of governance bodies like NEPOOL which is dominated by powerful, well-funded market participants with full-time staff and nearly unlimited access to technical consultants, the ability of communities most affected

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by the electricity system to participate meaningfully must be comprehensively addressed. Among the many recommendations raised in our prior comments, Acadia Center supports the establishment of an Advisory Board as part of a suite of reforms needed to address the imperative to create durable and meaningful participation by communities representing equity, environmental justice, and consumer interests. While many of the specific details would be determined by stakeholders, to be effective, the Advisory Board would, at a minimum, require:

- Membership representative of equity, environmental justice, and consumer-focused stakeholders from throughout New England.
- A fully funded budget similar to the mechanism for funding NESCOE (or the CAPS body in the PJM region) that compensates the Advisory Board members as well as funds the Board's needs for technical expertise.
- The authority to fully participate in the NEPOOL process with voting rights and engagement in proposal development and decision-making.ⁱⁱ
- Accountability mechanisms requiring ISO-NE staff to provide requested information, submit proposals, analytic scopes and assumptions, and decisions to the Advisory Board, in particular, to ensure that enhanced impact assessments of market proposals and transmission planning scenarios performed by ISO-NE staff have fully incorporated environmental justice criteria.
- Public transparency regarding the Advisory Board's requests to ISO-NE and all responses to those requests.

Conclusion

In addition to the clean energy advocacy coalition comments previously submitted through the New England Energy Vision process, Acadia Center directs your attention to recommendations presented in [Comments of Acadia Center and Other Public Interest Organizations on the FERC's Office of Public Participation \(AD21-9-000\)](#), many of which, if adopted in New England, would begin to address the role of state and regional organized electricity markets in achieving equity and environmental justice. Many other organizations focused on equitable and just outcomes in organized energy markets have commented on Docket AD21-9-000. Acadia Center recommends the New England states review these comments and consider for inclusion in any final recommendations stemming from the New England Energy Vision effort.

Thank you for the opportunity to submit comments on this very essential topic. I am available for further discussion and look forward to working to achieve the goals of the New England Energy Vision in an equitable, just, and fair manner.

For more information

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ⁱ Please see [Comments from Public Interest Organizations on ISO Governance](#) submitted to the New England Energy Vision website by Acadia Center, Conservation Law Foundation, Environmental Defense Fund, Natural Resources Defense Council, Sierra Club, and the Sustainable FERC Project for more detail on the recommended reforms.

ⁱⁱ The development of an Advisory Board would not be a substitute for decision-making process reforms as described in separate comments on Governance.