

Comments to New England States on the New England Energy Vision

Equity and Environmental Justice Forum Northeast Clean Energy Council, Advanced Energy Economy, Sunrun and Enel X

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The Northeast Clean Energy Council (NECEC), Advanced Energy Economy (AEE), Sunrun and Enel X appreciate the opportunity to offer brief comments related to connection with the New England Energy Vision process and the equity and environmental justice considerations. At the outset, we reiterate the call of many organizations that each element of the Vision process-- Wholesale Market Design, Transmission Planning, and Governance Reform--must be centered around equity and environmental justice.

We commend the New England states for addressing equity and justice directly in the overall process and for holding a separate session dedicated to these issues. As these efforts advance, urge a continued and intentional approach that includes joint decision-making with EJ communities at the table from the start and meaningfully accounts for community concerns. For each track of the process, we encourage the States to adopt the following principles which are adapted from the Massachusetts Global Warming Solutions Act, Implementation Advisory Committee¹ and its Climate Justice Working Group²

1. **Prioritize Equity and Justice** to avoid further harm to populations most vulnerable to and most at risk from climate impacts, pollution, displacement, energy burden and cost while prioritizing climate, environmental, energy, and health benefits to such populations. Prioritize analysis of cumulative impacts, while reducing burdens and increasing benefits to environmental justice populations.
2. **Put people first in Policy, Program Design and Implementation**, providing for and ensuring broad-based stakeholder participation, input, and oversight. These efforts should engage communities at the onset to ensure community input will influence decision-making.
3. **Support Partnerships and Collaboration in every way possible at scale for impact.** Ensure that national, regional, municipal, private, and NGO programs and contributions are used to increase support and likelihood of success.
4. **Ensure consistent and supportive approaches** to provide transparency, predictability and to avoid conflicts when evaluating the value of and co-benefit to each economic sector and natural resources.
5. **Prioritize Burden Reduction of** existing energy infrastructure in EJ communities and ensure that increased clean energy infrastructure investments (e.g., transmission equipment) do not increase the energy burdens in LMI and EJ communities.

¹ <https://www.mass.gov/doc/iac-work-group-proposed-guiding-principles-and-policy-priorities-updated-10262020/download>

² <https://www.mass.gov/doc/iac-climate-justice-work-group-policy-priorities/download>

The Transmission Planning part of the vision process is a key area where equity and justice concerns are likely to occur. Transmission planning and asset development is essential to achieving the levels of clean energy resources set in state policy. This process must move forward expeditiously and on a large and ambitious scale; at the same time, the process(es) undertaken to achieve the grid infrastructure we need must be inclusive and engage environmental justice populations and community-based organizations meaningfully. This means identifying key organizations, meeting them where they are, and identifying concerns and mitigating risks whenever possible in line with the principles identified above. In addition, planning and siting decisions must take into account geographic areas and communities that have borne cumulative environmental harms.

In addition to transmission, both the Governance and Wholesale Market tracks of the Vision process have strong equity and justice implications. Equity must be incorporated into every facet of policy and decision making at the wholesale/bulk power system. ISO Governance and the overall processes related to the operation of the bulk power system is incredibly opaque and participation and engagement is extremely difficult for most citizens. As part of addressing equity and justice concerns, the states must advance efforts to increase transparency and accessibility to ISO-NE's activities. To this end, we suggest that ISO and NEPOOL create and fund a function within their organizations that is dedicated to meaningful engagement with environmental justice communities. This will require an unwavering commitment and sufficient resources. In addition, the perspectives of environmental justice stakeholders must be incorporated into key decisions, including but not limited to transmission facility planning, siting and construction; overall market participation; and public participation in ISO-related activities.

Again, we appreciate the opportunity to offer these comments and commend the states for their efforts to bring equity and environmental justice issues squarely to the center of its New England Energy Vision process. Successfully incorporating equity and justice into each element of the process will yield economic and social benefits as the region moves forward with the clean energy transition.

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