Proposal to ISO New England Inc. for Two Studies of Transmission to Connect New Renewable Generation

NECPUC makes the following proposal to ISO New England, Inc. and its Planning Advisory Committee (PAC) for 2 studies of potential transmission projects to connect new generation sources, pursuant to the process under Attachment K of its Open Access Transmission Tariff (OATT).

The purpose of the studies is to analyze new transmission interconnections or upgrades to connect renewable resources from certain areas within New England. The goal is to evaluate such projects in a manner to be reviewed in an ongoing ISO New England stakeholder process.[1] Two zones within the region will be studied as part of this process: northern New Hampshire and northeastern Vermont; and offshore wind facilities in Northern and Southern New England.

Attachment K, "Regional System Planning Process," to the OATT of ISO-NE establishes a process for economic studies, a process whose purpose and scope remain undefined. In general terms, Attachment K calls for prioritization and selection of up to 3 economic studies each year with the cost of such studies to be paid for through the overall OATT cost of service. The date by which requests for such studies must be submitted is April 1. While ISO New England has convened a stakeholder process to consider the appropriate purpose and scope of Attachment K studies, this process will not be completed before the April 1 deadline for submittal of Attachment K requests for 2008. Consequently, since the nature of such studies remains to be developed, this proposal contains only a description of the geographic focus of the specific New England case studies requested. We look forward to working with ISO-NE and other stakeholders in the development of the analytic framework and to refine the parameters of the first three specific case studies. We urge ISO-NE to proceed with the studies proposed herein at its earliest convenience following completion of the Attachments N and K stakeholder process.

Two Specific New England Case Studies:

(a) Off-shore or coastal wind. Connecticut, Massachusetts, and Rhode Island have all recently undertaken extensive exploration of the potential for off-shore wind projects. Maine and New Hampshire also have extensive offshore wind capability. This case study should include a review of locations with known development interests (e.g., off of Cape Cod/southern MA, coastal RI, and coastal CT) as well as areas of potential interest (Maine and New Hampshire).

(b) Northern NH and northeast VT, wind, biomass and imports. Northern NH (mainly Coos County north of the White Mountain National Forest) has been identified as having the potential for roughly 500 MW of commercially viable wind and over 100 MW of biomass electric generation. The Northeast Kingdom of VT also has significant wind energy potential and some biomass potential. Large scale renewable development in northern NH and/or VT would likely require significant upgrades to transmission south of Whitefield and Comerford. NU and National Grid have done some preliminary analysis of this and have

[1] March 5, 2008 Memo to NEPOOL/NECPUC, from Robert Either, Director of Resource Adequacy and Chief Economist, ISO, New England, Inc., regarding "Stakeholder Review Process for Attachments K and N, available at: http://www.iso-ne.com/committees/comm_wkgrps/othr/econ_stdy/mtrls/2008/mar262008/memo_attachment_k_n_stakeholder_process_nes.pdf.

substantially completed a generator interconnection study for the first 100 MW project in the queue.[2]

[2] It might also make sense to take a high level look at connecting the Coos County transmission loop directly to transmission near Rumford, Maine for interconnecting western Maine wind and biomass, as well as possible interconnection of the Coos County loop or new transmission in the vicinity of the Lost Nation substation (Groveton, NH) directly to a new A/C line that might extend north from Comerford to the Quebec/Canada border in the HVDC corridor, to an HVDC interconnection with Hydro-Québec TransÉnergie like the one in Highgate, VT.