





June 27, 2023

Maria Robinson Director Grid Deployment Office United States Department of Energy 1000 Independence Avenue SW Washington, D.C. 20585

## Dear Director Robinson:

We are writing in regard to the June 16, 2023 letter officials from the states of Connecticut, Maine, Massachusetts, New Jersey, New Hampshire, New York, Rhode Island, and Vermont, requesting your assistance in forming a "Northeast States Collaborative on Interregional Transmission" (Northeast States Collaborative).

The letter suggested that the three northeast regional transmission organizations, the New York Independent System Operator, Inc. (NYISO), PJM Interconnection L.L.C. (PJM), and ISO New England, Inc. (ISO New England), could play an important role in supporting the work of a Northeast States Collaborative.

The NYISO, PJM, and ISO New England agree. As referenced in the June 16<sup>th</sup> letter, our regions already have in place a Northeastern ISO/RTO Planning Coordination Protocol<sup>1</sup>. Under the Protocol and other joint agreements, our regions coordinate planning efforts that include:

- Exchanging data and information;
- Coordinating interconnection requests and transmission requests with cross-border impacts;
- Developing a Northeastern Coordinated System Plan;
- Performing planning studies through an open stakeholder process; and
- Allocating the costs associated with interregional projects having a cross-border impact consistent with each party's tariff and applicable federal regulatory policy.

Our regions implement the Protocol consistent with interregional planning requirements of the Federal Energy Regulatory Commission (FERC) Order No. 1000, including the following:

- The sharing of information about the respective needs of each region and potential solutions to these needs; and
- The identification and joint evaluation of interregional transmission facilities that may be more efficient or cost-effective solutions to these regional needs.

<sup>&</sup>lt;sup>1</sup>The protocol is posted on the ISO-NE website: https://www.iso-ne.com/static-assets/documents/committees/comm\_wkgrps/othr/ipsac/rto\_plan\_prot/planning\_protocol.pdf

In addition, the Eastern Interconnection Planning Collaborative, of which each of us are members, has publicly committed to undertake an analysis of interregional transfer capability throughout the Eastern Interconnection. Moreover, NERC is undertaking nationwide analysis of interregional transfer capability including providing recommendations for future action in this area. Offshore wind development is a key component of the larger reviews of interregional transfer capability across the Eastern Interconnection. Accordingly, the NYISO, PJM, and ISO New England welcome the opportunity to leverage the expertise, tools, and processes we have in place to serve the work of a Northeast States Collaborative. We would ask that this work be coordinated with the other efforts outlined above to ensure consistency and avoid duplicative efforts. With that in mind, our regions stand ready to assist the Department of Energy and the northeast states in the development and informational needs of the Northeast States Collaborative, and look forward to supporting, as the June 16<sup>th</sup> letter states, "the strong partnership between DOE and the states to strengthen our power grid, drive down consumer costs, and accelerate the deployment of clean energy."

Sincerely,

Richard Dewey

President and Chief Executive Officer

New York Independent System Operator, Inc.

Manu Asthana

President and Chief Executive Officer

PJM Interconnection, L.L.C.

Gordon van Welie

President and Chief Executive Officer

ISO New England, Inc.

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## Dear Director Robinson:

We appreciate the U.S. Department of Energy's (DOE) focus on interregional transmission planning. This includes making funding available through your office for planning, modeling, and analysis and to facilitate stakeholder discussion. In addition, as you know, DOE's Draft National Transmission Needs Study released earlier this year, as well as DOE's Atlantic Offshore Transmission Study, identified the anticipated need for substantial new transfer capacity between various regions such as New England and New York and the Mid-Atlantic and New York, as well as system and governmental needs for the successful integration of new resources throughout the Northeast and Mid-Atlantic. Federal legislators and the Federal Energy Regulatory Commission are also exploring or proposing changes to transmission planning and operations to increase transfer capabilities between regions.

Rather than wait for new regulatory mandates to spur action, we can collectively take steps now to consider expanding ties between our regions to help enhance system reliability and transition to a clean energy future more quickly and affordably. To facilitate this effort, we are respectfully writing to request your assistance in forming a "Northeast States Collaborative on Interregional Transmission." By convening this group and leveraging DOE's technical expertise, DOE and states representing New England, New York, and New Jersey can work in partnership to explore opportunities for increased interconnectivity, including for offshore wind, between our regions.

In addition to DOE and the states, the three regional transmission organizations (RTOs) representing our regions could be invited to participate as additional technical support to the Collaborative. As RTOs, they are uniquely positioned to help identify cost-effective options for increasing transfer capability and have been coordinating on planning for many years through an

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<sup>&</sup>lt;sup>1</sup> Grid Deployment Office, Interregional and Offshore Wind Electricity Transmission Planning, Modeling and Analysis, at <a href="https://www.energy.gov/gdo/interregional-and-offshore-wind-electricity-transmission-planning-modeling-and-analysis">https://www.energy.gov/gdo/interregional-and-offshore-wind-electricity-transmission-planning-modeling-and-analysis</a>.

<sup>&</sup>lt;sup>2</sup> U.S. Department of Energy, National Transmission Needs Study: Draft for Public Comment, Feb. 2023, at <a href="https://www.energy.gov/sites/default/files/2023-02/022423-">https://www.energy.gov/sites/default/files/2023-02/022423-</a>
<a href="https://www.energy.gov/gdo/offshore-wind-transmission-federal-planning-support">https://www.energy.gov/gdo/offshore-wind-transmission-federal-planning-support</a>.

existing interregional process.<sup>3</sup> The Collaborative's work could be expanded to include other states and, at a later stage if and when appropriate, Canadian representatives.

We would welcome an opportunity to discuss the development of the Collaborative in more detail, including its potential scope of work and objectives. Let's build on the strong partnership between DOE and the states to strengthen our power grid, drive down consumer costs, and accelerate the deployment of clean energy.

Sincerely,

Rebecca Tepper Secretary

Massachusetts Executive Office of Energy and Environmental Affairs

Vironmental Affairs Protecti

June E. Tierney Commissioner

Vermont Department of Public Service

Kallu S Dykes

Katie S. Dykes Commissioner Connecticut Department of

Energy & Environmental Protection

Dan Burgess Director

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Doreen M. Harris President and CEO

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Chris Kearns
Acting Commissioner

pris Kearns

State of Rhode Island Office of Energy Resources

Jared Chicoine
Commissioner
New Hampshire Department

of Energy

<sup>&</sup>lt;sup>3</sup> <u>https://www.iso-ne.com/committees/planning/ipsac/.</u>