

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Building for the Future through Electric
Regional Transmission Planning and
and Cost Allocation**

Docket No. RM21-17-000

**JOINT MOTION FOR EXTENSION OF TIME UNTIL JUNE 14, 2027, TO
ACCOMMODATE REGIONAL AND INTERREGIONAL COMPLIANCE FILINGS**

Pursuant to Rules 212 and 2008 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the “Commission”),¹ ISO New England Inc. (“ISO-NE”),² together with the New England States Committee on Electricity (“NESCOE”),³ and the Participating Transmission Owners Administrative Committee (“PTO AC”) on behalf of the Participating Transmission Owners (“PTOs”)⁴ (the “Filing Parties”)⁵ provide a report on emerging New England long-term planning efforts and respectfully move for an extension of the deadlines contemplated in the Commission’s final rule on *Building for the Future Through*

¹ 18 C.F.R. §§ 385.212 and 385.2008 (2020).

² Capitalized terms used but not defined in this filing are intended to have the meaning given to such terms in the ISO New England Inc. Transmission, Markets and Services Tariff (the “Tariff”). Section II of the Tariff is the Open Access Transmission Tariff (“OATT”).

³ NESCOE is the Regional State Committee for New England, representing the collective positions of the six New England states in regional electricity matters. The six New England states consist of Connecticut, Massachusetts, Rhode Island, Maine, New Hampshire, and Vermont. Consistent with Order No. 1920-A, existing relevant state committee processes may guide Relevant State Entities in defining what constitutes agreement. *See* Order No. 1920-A at P 654.

⁴ Consistent with their obligations under the Transmission Operating Agreement as between ISO-NE and the PTOs, the PTOs have compliance obligations for local transmission planning requirements under Order No. 1920 and are a necessary party in order to effect changes to certain Tariff provisions over which the PTOs either hold exclusive filing rights (*e.g.*, cost allocation provisions) or share filing rights with ISO-NE (*e.g.*, interconnection procedures).

⁵ ISO-NE has coordinated this request for extension of the compliance filing deadline and implementation of Order Nos. 1920 and 1920-A with the New England Power Pool (“NEPOOL”) through NEPOOL counsel, who has consulted with NEPOOL leadership. NEPOOL, which pursuant to the Participants Agreement provides the sole Participant Processes for advisory voting on ISO matters, has authorized ISO-NE to state that NEPOOL does not oppose this request for extension of the Order Nos. 1920 and 1920-A compliance filing deadlines and implementation.

Electric Regional Transmission Planning and Cost Allocation (“Order No. 1920”), as modified by Order No. 1920-A.⁶ As further discussed herein, NESCOE has recently requested that ISO-NE initiate the first solicitation for transmission solutions to NESCOE-identified long-term needs under the existing Longer-Term Transmission Planning Process (“LTTP”).⁷ This long-term needs solicitation is expected to run through September 2026 and provides the opportunity for ISO-NE, the New England states, and stakeholders to gain invaluable experience implementing long-term planning that can then inform the development of a Long-Term Regional Transmission Planning process (“LTRTP”) that is compliant with Order Nos. 1920 and 1920-A. Accordingly, the Filing Parties request an extension of the time to submit the regional compliance filing directed in Order Nos. 1920 and 1920-A by twenty-four months from June 12, 2025,⁸ to June 14, 2027,⁹ and also request an extension of time to submit the interregional compliance filing by twenty-two months, from August 12, 2025,¹⁰ to June 14, 2027. Further, the Filing Parties seek an adjustment to the implementation deadline for regional and interregional transmission plans in accordance with Order Nos. 1920 and 1920-A,¹¹ from “two years from the

⁶ Building for the Future Through Electric Regional Transmission Planning and Cost Allocation, Order No. 1920, 187 FERC ¶ 61,068 (May 13, 2024), order on reh’g and clarification, Order No. 1920-A, 189 FERC ¶ 61,126 (Nov. 21, 2024), appeals pending, Petition for Review, Appalachian Voices v. FERC, Nos. 24-1650, et al. (4th Cir. July 16, 2024).

⁷ Letter, NESCOE, Transmission Needs for a Longer-term Transmission Planning RFP (Dec. 13, 2024), at https://www.iso-ne.com/static-assets/documents/100018/a05_2024_12_18_pac_transmission_needs_for_a_longer-term_transmission_planning_rfp_final.pdf.

⁸ “We . . . require each transmission provider to submit a compliance filing within ten months of the effective date of this final rule . . . that it meets all of the requirements adopted in this final rule, except those adopted in the Interregional Transmission Coordination section of this final rule.” Order No. 1920 at P 1768.

⁹ Twenty-four months following June 12, 2025, is June 12, 2027, which is a Saturday. Pursuant to 18 C.F.R. § 385.2007(a) (Rule 2007), a projected filing deadline following a twenty-four-month extension would, therefore, fall on Monday, June 14, 2027.

¹⁰ “[W]e also . . . require each transmission provider to submit a separate compliance filing within 12 months of the effective date of this final rule . . . that it meets the interregional transmission coordination requirements adopted in this final rule.” Order No. 1920 at P 1770.

¹¹ Order No. 1920-A at P 507. ISO-NE is targeting an implementation date as soon as December 2027.

date on which initial filings to comply with Order No. 1920 are due,” to four months from the date that the Commission issues an initial order accepting those filings.

The Filing Parties submit good cause exists to grant this motion. As noted above, on December 13, 2024, NESCOE submitted a request for ISO-NE to issue the first solicitation for transmission solutions to NESCOE-identified long-term needs under the recently accepted, supplemental LTTP rules in Attachment K of the ISO-NE OATT; NESCOE’s request forms the basis for this motion. The execution of the first request for proposals (“RFP”)—a substantial portion of which ISO-NE anticipates completing by September 2026—offers a first-time opportunity for ISO-NE, the New England states, and stakeholders to gain invaluable experience implementing long-term planning and to leverage that experience to inform the development of an LTRTP that is compliant with Order Nos. 1920 and 1920-A. The LTTP shares many aspects of the LTRTP envisioned by the Commission and is designed to achieve the same results—namely, the identification, evaluation, and selection of transmission solutions to address the region’s long-term transmission needs.¹² Affording the New England region additional time to leverage the “lessons learned” from executing the first RFP under the LTTP will directly benefit the development of an effective and durable LTRTP.

The Filing Parties also respectfully request that the Commission issue an order granting the requested extension by **February 10, 2025**, so that the region can proceed with certainty as to the deadline for meeting the directives of Order Nos. 1920 and 1920-A.

¹² See Concurring Opinion, Chairman Phillips, Order Accepting Tariff Revisions, Subject to Condition, and Directing Compliance, Docket No. ER24-1978-000 (issued July 8, 2024) (“ISO-NE’s proposal includes many of the significant components of Order No. 1920, such as multi-factor planning on at least a 20-year time horizon, an *ex ante* default cost allocation method, the option for states to agree on alternative cost allocation methods, and the option to voluntarily pay for the portion of a project that exceeds the identified benefit-cost ratio.”). See also Order No. 1920-A at P 3 (“[T]hese reforms ensure that transmission providers, state regulators, and stakeholders possess the information necessary for each transmission planning region to identify, evaluate, and select (i.e., determine whether to pursue the development of facilities) more efficient or cost-effective transmission facilities that provide significant benefits for customers.”).

I. BACKGROUND

A. Long-Term Transmission Planning in New England

Thanks to the New England states' and industry stakeholders' proactive and collaborative efforts to address the region's needs, ISO-NE is already implementing long-term transmission planning rules that include many aspects from the LTRTP required in Order Nos. 1920 and 1920-A. In 2020, the New England states laid out a vision for a longer-term planning process where the states have a central, decision-making role in planning for a reliable, clean energy future.¹³ Recognizing these efforts, ISO-NE developed a new planning element supplemental to Order No. 1000 planning processes, where ISO-NE could perform state-requested transmission analyses based on state-developed scenarios, inputs and assumptions, and time horizon (*i.e.*, Longer-Term Transmission Studies), and the states could advance transmission investment in connection with such studies. The LTTP improvements were developed by ISO-NE through collaboration and coordination with NESCOE, as the Regional State Committee for the New England states, spanning three years, between 2021–24. Each aspect of these rules reflects intensive engagement between ISO-NE and the six New England states, through NESCOE, to obtain consensus, including on cost allocation methodologies, as well as the PTOs to obtain agreement with respect to designated filing rights. ISO-NE also worked with NEPOOL to obtain NEPOOL review of, input into, and advisory votes on the proposed Tariff revisions incorporating the LTTP improvements. As a result of these intensive, collaborative efforts, the new rules received overwhelming support from stakeholders.

¹³ New England States' Vision for a Clean, Affordable, and Reliable 21st Century Regional Electric Grid, New England States Committee on Electricity, at 3-4 (Oct. 16, 2020), at https://nescoe.com/wp-content/uploads/2020/10/NESCOE_Vision_Statement_Oct2020.pdf.

The LTTP tariff revisions were bifurcated into two phases. On February 25, 2022, the Commission accepted the LTTP Phase 1 revisions, which enable the New England states to request that ISO-NE perform state-requested, scenario-based transmission planning studies that may extend beyond the ten-year planning horizon on a routine basis.¹⁴ The first such Longer-Term Transmission Study was finalized on February 12, 2024.¹⁵ On May 9, 2024, ISO-NE filed a request to adopt the LTTP Phase 2 revisions, which enable the New England states to request that ISO-NE conduct a competitive solicitation for the development of transmission solutions to state-identified longer-term needs and establish the cost allocation methodologies for the associated transmission infrastructure.

The filing letter submitted with the LTTP Phase 2 revisions acknowledged that, while the changes were not proposed in connection with the Notice of Proposed Rulemaking in RM21-17—*Building for the Future through Electric Regional Transmission Planning and Cost Allocation*—such revisions “align with and advance the objectives articulated [] therein.”¹⁶

Those similarities are evident in the following description of the LTTP process:

The LTTP Phase 2 Changes comprise a package of processes that enable the New England states to advance from the state-requested, scenario-based [Longer-Term Transmission Studies] to regional transmission solutions and cost allocation for such solutions needed for the states to achieve their energy and environmental policy objectives. The processes include: (1) a comprehensive core process and (2) an add-on supplemental process. . . . The processes will include strong stakeholder engagement along the way. They will also have an ex ante default cost allocation methodology for [Longer-Term Transmission Upgrades] that meet Tariff-based criteria demonstrating quantifiable broad regional benefits, and a mechanism for

¹⁴ ISO New England Inc., 178 FERC ¶ 61,137, at P 15 (2022) (accepting Tariff revisions to incorporate a supplementary transmission planning process authorizing ISO-NE to conduct state-led, scenario-based transmission analysis in the Regional System Planning Process) (“February 2022 Order”).

¹⁵ ISO-NE, 2050 Transmission Study Final Report (Feb. 12, 2024), at https://www.iso-ne.com/static-assets/documents/100008/2024_02_14_pac_2050_transmission_study_final.pdf.

¹⁶ Filing Letter, ISO-NE, Revision to the Attachment K Longer-Term Transmission Planning Process, Docket No. ER-24-1978-000, at 3 (May 9, 2024) (hereinafter “LTTP Phase II Filing Letter”).

alternative cost allocation methods where projects do not meet the Tariff-based criteria. . . .¹⁷

On July 8, 2024, the Commission accepted ISO-NE’s proposed Tariff revisions to establish LTTP Phase 2.¹⁸ Chairman Phillips, in his concurring opinion, positively acknowledged the similarities between the newly-accepted LTTP process and the Commission’s intentions for the anticipated LTRTP process.¹⁹ Chairman Phillips’ and Commissioner Christie’s concurring opinions both strongly supported the New England states’ close involvement in the development of, as well as decision making role in, the LTTP process.²⁰ Given the known similarity and likely intersection of the LTRTP and LTTP, great care will need to be taken to ensure the intended alignment and successful implementation of both processes.²¹

On October 16, 2024, NESCOE, on behalf of the six New England states, gave notice of its intention to submit a formal solicitation request under the LTTP and issued a letter identifying potential transmission needs for an LTTP RFP, with a request for stakeholder comment.²² On December 13, 2024, following stakeholder input, NESCOE sent its formal request for ISO-NE to issue the first solicitation under the LTTP rules for transmission proposals that would “(1)

¹⁷ LTTP Phase II Filing Letter at 3.

¹⁸ Order Accepting Tariff Revisions, Subject to Condition, and Directing Compliance, Docket No. ER24-1978-000 (issued July 8, 2024).

¹⁹ “ISO-NE’s proposal includes many of the significant components of Order No. 1920, such as multi-factor planning on at least a 20-year time horizon, an *ex ante* default cost allocation method, the option for states to agree on alternative cost allocation methods, and the option to voluntarily pay for the portion of a project that exceeds the identified benefit-cost ratio.” *Id.*

²⁰ Chair Phillips stated, “I applaud ISO-NE and the New England states for working together and with stakeholders to voluntarily develop a long term, regional transmission planning process, which goes a long way toward meeting the requirements of Order No. 1920.” Commissioner Christie stated, “I concur in today’s order because the role of the states in longer-term planning and cost allocation of public policy projects in a multi-state region in this proposal exemplifies what the Commission should approve and encourage.” *Id.*

²¹ Pursuant to Order No. 1920-A, supplemental long term planning processes that are not subject to the requirements of Order No. 1000 are considered to not be affected by Order No. 1920 and do not need to be re-approved. Order No. 1920-A at P 715.

²² Letter, NESCOE, Potential Transmission Needs for a Longer-term Transmission Planning RFP (Oct. 16, 2024), at https://www.iso-ne.com/static-assets/documents/100016/a03_pac_nescoe_rfp_letter.pdf.

strengthen the connection between northern and southern New England, and (2) facilitate the integration and deliverability of additional resources located in Maine.”²³

The LTTTP RFP request is a significant milestone for the region and is the first ever instance in which all states in a multi-state RTO region have agreed to move forward with a long-term transmission planning solicitation. The final scope seeks transfer capability increases at two interfaces, to at least 3,000 MW on Maine-New Hampshire and at least 3,200 MW on Surowiec-South by 2035, as well as new infrastructure to accommodate the interconnection of at least 1,200 MW of onshore wind at or near Pittsfield, Maine. The RFP, and resulting proposals, also will be within the context of a Maine transmission system that has known stability and voltage constraints and challenges.²⁴ The RFP establishes minimum requirements to allow bidders to expand project scope to incorporate additional, measurable benefits that are cost-effective. ISO-NE is now preparing to release the NESCOE-requested RFP in March 2025, with final selection anticipated to occur in September 2026, as detailed in the timeline discussed below.

B. Order Nos. 1920 and 1920-A

On May 13, 2024, in Docket No. RM21-17-000, the Commission issued Order No. 1920, which requires public utility transmission providers, including ISO-NE and the PTOs, to make a number of changes to the regional and local system planning process set forth in Attachment K of the OATT. Specifically, Order No. 1920 requires transmission providers to: (1) engage in

²³ Letter, NESCOE, Transmission Needs for a Longer-term Transmission Planning RFP (Dec. 13, 2024), at https://www.iso-ne.com/static-assets/documents/100018/a05_2024_12_18_pac_transmission_needs_for_a_longer-term_transmission_planning_rfp_final.pdf.

²⁴ See, e.g., ISO-NE, Presentation, Post-NECEC Main Transfer Limits, at slides 5, 12 (Dec. 18, 2024), at https://www.iso-ne.com/static-assets/documents/100018/a07_2024_12_18_post_necec_maine_transfer_limits.pdf. This presentation shows that all Maine transfer limits show stability concerns, even after the New England Clean Energy Connect project and its associated upgrades are placed in-service.

long-term regional transmission planning with a minimum twenty-year planning horizon and, as part of such planning, develop Long-Term Scenarios to identify long-term transmission needs and enable the identification and evaluation of transmission facilities to meet such transmission needs; (2) determine a cost allocation methodology for Long-Term Regional Transmission Facilities; (3) evaluate interconnection-related transmission needs in existing regional transmission planning processes; (4) consider alternative transmission technologies; (5) increase transparency of local transmission planning processes and opportunities for right-sizing; and (6) interregional transmission coordination. Order No. 1920 requires transmission providers to submit a regional compliance filing ten months following the date of publication of the rule in the Federal Register, and an interregional transmission coordination filing twelve months following publication—*i.e.*, June 12, 2025, and August 12, 2025, respectively.²⁵

Recognizing the magnitude of the upcoming compliance effort, ISO-NE promptly commenced its assessment of Order No. 1920 after the Commission’s issuance of the order, to begin to understand how the then-recently filed LTTP Phase 2 revisions would or would not meet the new requirements. Stakeholder discussion of Order No. 1920 commenced at the Transmission Committee meeting held on May 16, 2024.²⁶ On July 8, 2024, the Commission issued its order accepting ISO-NE’s LTTP Phase 2 revisions. On September 9, 2024, ISO-NE provided notice of the six-month State Engagement Period for the Relevant State Entities to develop and agree on transmission cost allocation. ISO-NE also began stakeholder discussions at the Transmission Committee on September 25, 2024, with a presentation on a high-level

²⁵ Order No. 1920 at P 1768.

²⁶ NEPOOL counsel presented to the committee with ISO-NE staff present to answer questions. FERC Final Rule on Transmission Planning – Order No. 1920; NEPOOL Counsel Presentation to transmission Committee (May 16, 2024), at https://www.iso-ne.com/static-assets/documents/100011/a05_nepool_counsel_memo_transmission_planning_final_rule.pdf.

overview of the requirements of Order No. 1920 compared to the LTTP, a discussion of the requirements for the State Engagement Period, and a compliance development plan,²⁷ along with a chart providing a detailed comparison of the requirements of Order No. 1920 against the LTTP.²⁸ These materials highlighted ISO-NE's initial findings that, while the LTTP aligns with the goals and many of the components of the LTRTP, there are prescriptive differences that require further shaping of the LTRTP, specific to New England, to meet the Commission's envisioned goals. Following this presentation, ISO-NE continued internal deliberations in earnest, specifically inquiring to what extent the LTTP could be leveraged to inform the LTRTP compliance plan.

At the October 24, 2024 Transmission Committee meeting, ISO-NE notified stakeholders that it would be deferring stakeholder discussions on Order No. 1920.²⁹ ISO-NE instituted this pause given the significant uncertainty from the then-pending rehearing requests and appellate court filings regarding Order No. 1920 and the potential impact on compliance requirements. The pause would also help ISO-NE focus its efforts on the implementation of the LTTP rules in advance of the expected request for ISO-NE to issue an RFP.³⁰ During this time period and pursuant to its defined role under the LTTP, ISO-NE Transmission Planning staff was actively

²⁷ ISO-NE, FERC Order No. 1920 Presentation to the Transmission Committee (Sept 25, 2024), at https://www.iso-ne.com/static-assets/documents/100015/a05_tc_order1920_presentation.pdf.

²⁸ ISO-NE, Comparison of ISO-NE LTTP Tariff Provisions to FERC Order 1920 Requirements (Sept. 25, 2024), at https://www.iso-ne.com/static-assets/documents/100015/a05_tc_1920_ltpp_comparison_chart.docx.

²⁹ NEPOOL TC Committee, Minutes of the Transmission Committee (TC) Meeting, at 4–5 (October 24, 2024), at https://www.iso-ne.com/static-assets/documents/100017/2024_10_24_tc_meeting_minutes_final.pdf.

³⁰ As part of its implementation of the LTTP rules, ISO-NE staff also updated the Transmission Planning Process Guide to include the LTTP during this period, https://www.iso-ne.com/static-assets/documents/100017/a07_ltts_phase_2_tppg_update_pac_presentation.pdf.

consulting with and providing technical support to NESCOE to identify longer-term needs that might be addressed through an RFP in connection with the 2050 Transmission Study.³¹

On November 21, 2024, the Commission issued Order No. 1920-A, which largely sustained Order No. 1920, including the regional and interregional compliance filing deadlines. However, Order No. 1920-A enhanced state involvement in the LTRTP, namely in relation to the development of a Long-Term Regional Transmission Cost Allocation Method and/or State Agreement Process³² and the development of Long-Term Scenarios. Importantly, while Order No. 1920 established that the first Long-Term Regional Transmission Planning Cycle was to begin no later than one year from the regional compliance filing deadline, Order No. 1920-A sets aside Order No. 1920 to establish that such cycle start date occur no later than *two* years from the regional compliance filing deadline.³³

II. JOINT MOTION FOR EXTENSION OF TIME

Under the Commission’s Rule 2008, “the time by which any person is required or allowed to act under any statute, rule, or order may be extended by the decisional authority for good cause, upon a motion made before the expiration of the period prescribed or previously extended.”³⁴ The Filing Parties respectfully submit to the Commission that good cause exists to grant this motion for: an extension of the regional compliance filing deadline from June 12,

³¹ “At the request of NESCOE, the ISO will consult with and provide technical support to NESCOE on possible longer-term needs that may be addressed through one or more request for proposal(s) in connection with a Longer-Term Transmission Study or a follow-on study. During this consultation, the ISO, at its sole discretion, may also identify for NESCOE’s consideration known non-time-sensitive reliability or market efficiency needs that could be combined with longer-term needs in a request for proposal(s).” ISO-NE OATT, Attachment K, Section 16.4(a).

³² Notably, the order directs transmission providers to assist Relevant State Entities in State Engagement Period discussions if requested to do so: “[U]pon the request of Relevant State Entities, transmission providers must facilitate and participate in a cost allocation discussion during the Engagement Period with Relevant State Entities.” Order No. 1920-A at P 651.

³³ Order No. 1920-A at P 507.

³⁴ 18 C.F.R. § 385.2008(a) (2020).

2025, to June 14, 2027; an extension of the interregional compliance filing deadline from August 12, 2025, to June 14, 2027; and an adjustment to the implementation deadline for regional and interregional transmission plans from “two years from the date on which initial filings to comply with Order No. 1920 are due,” to four months from the date that the Commission issues an initial order accepting ISO-NE’s regional and interregional compliance filings.

The primary reason for this motion is to allow for substantial completion of the first LTTP RFP, which is planned to occur by September 2026, in order to incorporate valuable “lessons learned” into the development of the LTRTP. With the requested extensions, ISO-NE, NESCOE, PTOs, NEPOOL, and other stakeholders will have the unique opportunity to leverage valuable “lessons learned” from the LTTP solicitation into LTRTP development and allows for the complementary building and implementation of the LTTP and LTRTP processes. Allowing the LTTP cycle to advance through evaluation and selection before initiating in-depth discussions on the LTRTP presents an invaluable opportunity for stakeholders to gain further practical understandings about whether and, if so, how the LTTP and LTRTP might actually interact or complement each other, which has been a leading question in compliance discussions—both internally and at the NEPOOL Transmission Committee—thus far.

Moreover, the same key staff at ISO-NE will be taxed with both of these efforts. Without the requested extensions, the timeline for development of the NESCOE long-term RFP solicitation will directly conflict with the development of the LTRTP. The Filing Parties believe that staff’s undivided attention to the tasks on a sequential basis would result in better products for each. Building on the experience of developing the LTTP, but also allowing for a full compliance development period, would achieve the best possible LTRTP process. The Filing Parties believe, therefore, that extending the compliance development timeline to June 2027 is

extremely desirable. ISO-NE is committed to a first LTRTP cycle start date within four months of the Commission’s initial order accepting the compliance filings.

ISO-NE anticipates issuing the LTTP RFP in March 2025 and completing the evaluation and selection of transmission proposals in September 2026. The following table reflects the anticipated LTTP solicitation steps and associated timelines:

	Target dates
Request-for-Proposals Development and Issuance – 3 months <i>This period includes ISO-NE developing base cases and models necessary for bidders to develop proposals</i>	March 2025
Submission of Proposals – 6 months <i>This period includes ISO-NE answering clarifying questions to bidders</i>	September 2025
ISO Review of Proposals/Selection – 12 months	September 2026

To achieve this timeline, ISO-NE’s Transmission Planning staff will be dedicated to the LTTP solicitation from approximately December 2024 to September 2026. Through March 2025, ISO-NE Transmission Planning staff will be dedicated to the development of the RFP, which not only requires the translation of NESCOE’s communication to ISO-NE into an RFP, but also the development of base cases and models necessary for bidders to develop their proposals. While the timeline reflects a six-month solicitation window—from March 2025 to September 2025—during which Transmission Planning staff would appear to be free, in fact, Transmission Planning staff will be addressing solicitation-related questions from potential project proponents, as occurred when implementing the region’s first competitively developed transmission solicitation process from December 2019 to March 2020 (commonly referred to as the “Boston RFP”). Additionally, Transmission Planning staff will be engaged in substantial preparation for evaluating proposals, including improvements to automated study tools, creation of system models at various transfer levels for ease of later analysis, and preliminary analysis of the financial benefits that may be associated with various levels of interface limit increases. Staff of

NESCOE and other Relevant State Entities in New England will be similarly focused on the LTTP RFP in evaluation of proposals and the selection process, which will occur from approximately September 2025 through September 2026.

In addition, specific end-of-year activities have already been identified to be advanced to earlier in the year so that Transmission Planning staff are ready to undertake the evaluation and selection process for the LTTP solicitation beginning in September 2025. These activities include but are not limited to: mandatory planning studies under NERC Reliability Standards, such as TPL-001; NPCC Area Transmission Review; completion of ongoing reliability studies for Boston and Connecticut; and development and issuance of the annual Base Case Library. To provide a responsive and efficient solicitation process, ISO-NE has already begun implementing its resources toward this process. The redirection of these resources toward the development of another complex transmission planning process would risk delay in the LTTP solicitation and project selection, and could result in suboptimal compliance filings. In contrast, leveraging the extensive work that has already been memorialized into the LTTP process presents an invaluable opportunity.

The requested extension would also protect the integrity of the LTTP solicitation process. Given that the LTTP and LTRTP processes are so similar in structure, open discussions on the development of the new LTRTP process that would need to occur during the LTTP proposal development period introduces the potential for information conflict. Should ISO-NE need to work toward a June 12, 2025 regional compliance filing deadline, open, deliberative discussions to develop the LTRTP would need to occur between March 2025 and June 2025, which encompasses nearly all dedicated NEPOOL technical committee meetings leading up to the regional compliance filing deadline. As a practical matter, discussions regarding LTTP “lessons

learned” during the exact period that the LTTP solicitation is open would not be possible given the potential risks for such information to impact the integrity of the solicitation process. The current conflict in the timelines would, in this way, thwart open, deliberative discussions and would not give NEPOOL, which provides the sole market participant stakeholder process for advising on ISO-NE matters under the Participants Agreement, adequate time to provide meaningful input into the compliance proposal. Commencing the compliance development process after the completion of the LTTP evaluation and selection process, however, provides an opportunity to leverage “lessons learned” in the development of the LTRTP and to have those discussions openly with stakeholders without risking the integrity of the LTTP solicitation or the NEPOOL stakeholder process.

The extension would also provide more time for the Relevant State Entities to participate in the State Engagement Period on a timeline that would complement development of the new process. On September 9, 2024, ISO-NE established a six-month State Engagement Period that would begin on that same day and end on March 10, 2025. The State Engagement Period, pursuant to Order No. 1920, would allow for Relevant State Entities to consider a Long-Term Transmission Cost Allocation Method(s) and/or State Agreement Process for communication to ISO-NE and potential inclusion in the regional compliance filing.³⁵ According to the notice issued by ISO-NE to the Relevant State Entities, any agreements emerging from the State Engagement Period would be required to be communicated to ISO-NE by no later than Monday, March 17, 2025, to allow time for ISO-NE and the PTOs’ consideration thereof in the June 12, 2025 regional compliance filing.³⁶

³⁵ Letter, ISO-NE, Notice of Six-Month Engagement Period on Transmission Cost Allocation (Sept. 9, 2024), at https://www.iso-ne.com/static-assets/documents/100015/notice_of_six_month_engagement_period_1.pdf.

³⁶ *Id.*

ISO-NE established these engagement period dates to accommodate review and consideration of any proposals from the Relevant State Entities, as well as to provide the Relevant State Entities with the opportunity to understand the conceptual approach to a compliance plan before finalizing any proposals on cost allocation. The engagement period end-date of March 10, 2025, provided the PTOs, through the PTO AC, and then also ISO-NE and the NEPOOL committees the needed time to consider any proposals communicated by the Relevant State Entities prior to committee voting and final preparation of the filing.

Given the previous cost allocation discussions engaged upon by the New England states, through NESCOE, during planning for the LTTP—which included an *ex ante* default cost allocation methodology and a mechanism for alternative cost allocation methods—the Filing Parties, and especially the Relevant State Entities, share a common and productive engagement on these matters. With the extension that is now being requested, the Filing Parties all recognize that the State Engagement Period will need to occur between September 2026 and March 2027 to fulfill the requirements of Order Nos. 1920 and 1920-A.³⁷ It would be beneficial for this six-month period to occur after substantial stakeholder discussion on Order No. 1920 compliance has commenced, so that the Relevant State Entities can understand the conceptual approach to a compliance plan before finalizing any proposals on cost allocation. In considering a request for an extension, the Filing Parties considered which timeline would support the most robust, informed, and state-engaged outcome that also honors the Commission’s understandable interest in implementation that is evident in Order No. 1920-A.³⁸ It was concluded, by the Filing Parties,

³⁷ Similarly, and pursuant to Order No. 1920-A, the Commission identified “the critical role that states play in the development of new transmission infrastructure, particularly at the regional level” when determining that Relevant State Entities might “need additional time to complete cost allocation discussions” and “to engage in fulsome discussions.” Order No. 1920-A at P 677–78.

³⁸ Order No. 1920-A at P 914.

that a June 12, 2027 compliance filing deadline will allow for a full window of compliance development, state engagement, and stakeholder process following the anticipated completion of the LTTP RFP evaluation and selection phases that essentially mirrors the timeline that ISO-NE developed for the original June 12, 2025 regional compliance filing—which originally planned for compliance filing development starting in September, with draft tariff language in January, committee votes in April and May, for a June compliance filing—with the accompanying State Engagement Period from September 2026 through March 2027. During this time, starting in September 2026, ISO-NE will begin compliance discussions with NEPOOL and will work with NESCOE to inform NEPOOL of proposals that come out of the State Engagement Period discussions, with voting anticipated to occur at the NEPOOL Transmission Committee in April 2027, at the NEPOOL Participants Committee in May 2027, and also at the PTO AC in that timeframe.

The Filing Parties submit that granting these extensions would be consistent with prior Commission rulings. Importantly, the Commission has recently granted an extension of time under similar circumstances. On December 10, 2024, the Commission granted the Midcontinent Independent System Operator, Inc.’s (“MISO’s”) request for a twelve-month extension to their regional compliance filing deadline.³⁹ MISO argued that good cause existed to grant the extension because the current timeline for compliance conflicted with its own Long Range Transmission Planning (“LRTP”) efforts, and that continuing with the two processes in tandem would result in disruption to the LRTP, delayed projects, and slow consideration of present long-term transmission needs.⁴⁰ MISO further cited the “enormous undertaking” represented by

³⁹ Notice of Extension of Time (Dec. 10, 2024).

⁴⁰ Motion for Extension of Time to Submit Compliance Filing. . . of Midcontinent Independent System Operator, Inc. (Nov. 5, 2024).

the LRTP for MISO and its stakeholders, including its states,⁴¹ seeking “to ensure that the Order No. 1920 compliance effort is properly aligned and integrated with MISO’s ongoing long-term transmission planning efforts.”⁴² Similar to ISO-NE’s request, the extension, MISO argued, “would allow for more stakeholder input into the Order No. 1920 compliance process, including from state regulators.”⁴³

The Filing Parties recognize the extensions requested herein would provide for Order No. 1920 regional and interregional compliance filings in June 2027, which represents a period longer than the twelve months granted to MISO. Comparatively, the planning processes between MISO and ISO-NE are materially different in ways that are directly relevant to a compliance filing period, including that MISO is further along in its current LRTP cycle, while ISO-NE is in its first LTTP cycle. The Filing Parties also submit that the region’s implementation deadline would not need to be projected out as far as two years from filing, as contemplated in Order No. 1920-A. Instead, ISO-NE is confident that, following the conclusion of the LTTP RFP cycle, implementation of the new LTRTP is feasible within four months from the certainty of the Commission’s initial order accepting the compliance filings. Implementation of the new process is a priority for ISO-NE and the requested extension periods are not intended to delay the implementation of the first LTRTP cycle. The Filing Parties believe this schedule preserves and honors the Commission’s implementation goals for this vital transmission planning initiative.

To further transparency in continuing development on the LTRTP, and given the longer regional and interregional compliance filing extensions that the Filing Parties are seeking herein, the Filing Parties propose that ISO-NE submit informational filings to the Commission to

⁴¹ *Id.* at 6.

⁴² *Id.* at 9.

⁴³ *Id.* at 10.

document its progress in meeting the prescribed deadlines herein. Specifically, the Filing Parties propose that, in August 2026—thirty days prior to the September 2026 initiation of the stakeholder engagement—ISO-NE submit an informational filing describing the stakeholder process schedule and consultation with NEPOOL regarding the development of that schedule. The Filing Parties also propose that ISO-NE submit status reports every ninety days thereafter until the requested compliance filing deadline. The Filing Parties propose that these status reports provide details regarding the region’s compliance plans and the progress of the ongoing stakeholder discussions regarding those plans, so that the Commission can gain familiarity with the plans in advance of the regional and interregional compliance filings.⁴⁴

The Filing Parties respectfully submit that the requested extension will not harm or prejudice any party. Instead, such an extension will provide additional benefits to the New England states and stakeholders, by ensuring their meaningful participation as well as the full dedication of ISO-NE resources to both long-term processes, to the benefit of the region as a whole. With the granting of the requested extensions, ISO-NE could maintain the planned dedication of resources toward the first LTTP solicitation. Thereafter, ISO-NE would be positioned to leverage invaluable “lessons learned” into the development of a new LTRTP process and stakeholders would be allowed more time and opportunity to participate in the development of the LTRTP. With this motion, therefore, the Filing Parties believe that the requested extension is both reasonable and would provide a superior outcome for both processes and ultimately advance the Commission’s goals in Order No. 1920 in the most meaningful way.

⁴⁴ The Commission required a similar reporting structure “to assist in facilitating stakeholder deliberations and provide information on . . . progress” when granting an approximate 6.5-month extension to ISO-NE to comply with Order No. 2222. Letter Order, Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators, Docket No. RM18-9-000 (issued May 24, 2021).

Based on the foregoing, the Filing Parties submit that good cause exists to grant the requested extensions.

III. REQUEST FOR COMMISSION ACTION BY FEBRUARY 10, 2025

The Filing Parties respectfully request the Commission's response to this motion by February 10, 2025. In the event the requests for extension herein are not granted, ISO-NE must immediately begin stakeholder engagement in the relevant NEPOOL technical committees. A response by February 10, 2025, would allow engagement with the NEPOOL Transmission Committee to begin at its February 27, 2025 meeting. That timeline would allow for a compliance proposal to be discussed with the Transmission Committee two times prior to finalizing a compliance proposal for votes at the Transmission Committee and the Participants Committee, ahead of the current June 12, 2025 compliance filing deadline. As such, the Filing Parties believe that a Commission response by the proposed February 10, 2025, would provide ISO-NE and stakeholders the needed clarity to plan a timeline for compliance in either event.

IV. CONCLUSION

For the foregoing reasons, the Filing Parties respectfully request that the Commission grant this motion for: (1) an extension of the regional compliance filing deadline from June 12, 2025, to June 14, 2027; (2) an extension of the interregional compliance filing deadline from June 12, 2025, to June 14, 2027; and (3) an adjustment to the implementation deadline for regional and interregional transmission plans from "two years from the date on which initial filings to comply with Order No. 1920 are due," to four months from the date that the Commission issues an initial order accepting ISO-NE's regional and interregional compliance filings. The Filing Parties also respectfully request for the Commission issue an order granting these requests by **February 10, 2025**.

Respectfully submitted,

ISO NEW ENGLAND INC.

By: /s/ Jillian Kasow

Monica Gonzalez
Assistant General Counsel—Operations & Planning
Jillian Kasow
Regulatory Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
Tel: (413) 535-4178
Tel: (413) 540-4460
Fax: (413) 535-4379
E-mail: mgonzalez@iso-ne.com
E-mail: jkasow@iso-ne.com

Counsels for ISO New England Inc.

**NEW ENGLAND STATES
COMMITTEE ON ELECTRICITY**

By: /s/ Shannon Beale

Shannon Beale
Assistant General Counsel
New England States Committee on
Electricity
P.O. Box 322
Osterville, MA 02655
Tel: (781) 400-9000
Email: shannonbeale@nescoe.com

Counsel for the New England States
Committee on Electricity

**THE PARTICIPATING TRANSMISSION
OWNERS ADMINISTRATIVE COMMITTEE**

By: /s/ Mary E. Grover

Mary E. Grover, Esq.
Chair of the PTO AC Legal Working Group
On behalf of the Participating Transmission Owners
Administrative Committee
c/o Eversource Energy Service Company
247 Station Drive, SE100
Westwood, MA 02090
Tel: (781) 441-8696
Email: mary.grover@eversource.com

Counsel for the Participating Transmission
Owners Administrative Committee

Dated: January 15, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Commission Secretary in these proceedings.

Dated at Holyoke, MA this 15th of January, 2025.

/s/ Julie Horgan

Julie Horgan
eTariff Coordinator, Legal Department
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040
(413) 540-4683