

New England States  
Committee on Electricity

**To:** ISO-NE/PAC  
**From:** NESCOE  
**Date:** January 11, 2012  
**Subject:** Comments on 2011 Economic Studies

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NESCOE submits the following observations and questions to ISO New England in response to its November 16, 2011 and December 14, 2011 presentations to the Planning Advisory Committee (PAC) clarifying next steps in connection with the 2011 Economic Studies. We welcome discussion about - rather than a written response to - the issues below.

- 1. It would be helpful to the states if ISO-NE could articulate a systematic process to collect, retain and ultimately release the raw data generated by the economic studies, at a fairly granular level.**

NESCOE recognizes the limits allowed by confidentiality requirements, however information beyond the charts and graphs that have historically been made available for previous Economic Studies would help the states as we seek to identify the best approaches to further development of projects that may meet public policy objectives. Specifically, the raw data behind any table or graph presented to the PAC would be helpful.

- 2. NESCOE generally supports the objectives and planned methodology, especially if the data will be made available.**
- 3. NESCOE seeks ISO-NE confirmation that ‘100% deliverability’ means that new wind generation can displace dispatchable fossil or nuclear generation, but does not displace existing wind, solar, hydro, landfill gas or biomass generation. If any of these renewable generation resources are displaced by new wind generation, NESCOE requests that ISO-NE report to what extent such renewable generation is curtailed, as wind generation increases as well.**

**4. Does ISO-NE plan to synthesize the ultimate results of the economic studies with the conclusions of the strategic planning studies (or other related studies)?**

Studying specific planning futures in silos could lead to apparently inconsistent or contradictory conclusions. As states consider and plan for future resource adequacy and/or to meet public policy objectives, it is important that the information made available to assess future system characteristics is consistent and comparable *or* that differences in studies are clearly identified. We would welcome a conversation about this issue.