

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

ISO New England Inc.

)

Docket No. ER15-519-000

**COMMENTS OF
NEW ENGLAND POWER POOL PARTICIPANTS COMMITTEE**

(December 19, 2014)

The New England Power Pool (“NEPOOL”) Participants Committee¹ hereby files these comments in the above-captioned docket.² This proceeding was initiated by the December 1, 2014 filing by ISO New England Inc. (“ISO-NE”) of its revisions to its Open Access Transmission Tariff (“OATT”) and request for waivers related to Order No. 676-H³ (the “ISO-NE Waiver Filing”). In the ISO-NE Waiver Filing, ISO-NE request renewal of several waivers previously granted by the Commission (because the conditions for those waivers have not changed), requests waivers of certain new standards required by Order No. 676-H, and submits certain revisions to the ISO-NE OATT in compliance with Order 676-H.

¹ NEPOOL is a voluntary association organized in 1971 pursuant to the New England Power Pool Agreement, and it has grown to include more than 430 members. The Participants include all of the electric utilities rendering or receiving services under the ISO-NE Tariff, as well as independent power generators, marketers, load aggregators, brokers, consumer-owned utility systems, demand response providers, developers, end users and a merchant transmission provider. Pursuant to revised governance provisions accepted by the Commission in *ISO New England Inc. et al.*, 109 FERC ¶ 61,147 (2004), the Participants act through the NEPOOL Participants Committee. The NEPOOL Participants Committee is authorized by Section 6.1 of the Second Restated NEPOOL Agreement and Section 8.1.3(c) of the Participants Agreement to represent NEPOOL in proceedings before the Commission. NEPOOL is the principal stakeholder organization for the New England RTO.

² NEPOOL timely moved to intervene in the above-captioned docket by document-less intervention on December 4, 2014.

³ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-H, 148 FERC ¶ 61,205 (2014), as modified by the Commission’s October 2, 2014 *Errata Notice*, 149 FERC ¶ 61,014 (2014) (“Order No. 676-H”).

I. BACKGROUND

On April 25, 2006, the Commission issued its Order No. 676⁴ which required public utilities to revise their OATTs to include North American Energy Standards Board's ("NAESB") Version 000 Standards for Business Practices and Communication Protocols of the Wholesale Electric Quadrant ("WEQ Standards"). Order No. 676 gave public utilities the chance to submit requests for waivers of individual standards.⁵ ISO-NE filed such requests seeking certain waivers with respect to its offering of Regional Network Service and Through or Out Service ("Regional Transmission Services"), and those requests were granted by the Commission, recognizing the unique nature of New England's Regional Transmission Services.⁶ Subsequently, the Commission has also granted ISO-NE requested waivers to NAESB WEQ Standards under Order Nos. 676-C and 676-E. Order No. 676-H, amends the Commission's regulations in order to incorporate NAESB WEQ Version 003 Standards, which include modifications to support the implementation of Order No. 690⁷ and relate to *pro forma* OATT services that are not offered by ISO-NE.⁸

ISO-NE now is requesting the renewal of previously granted waivers of compliance requirements associated with certain Version 003 WEQ Standards, which were incorporated by reference into Order No. 676-H.⁹ Further, ISO-NE is seeking waivers of new standards that are contained within NAESB's WEQ Version 003 standards related to the *pro forma* OATT and

⁴ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676, 115 FERC ¶ 61,102 (2006) ("Order No. 676").

⁵ Order No. 676.

⁶ *ISO New England Inc.*, 117 FERC ¶ 61,195 (2006). Unlike the *pro forma* OATT, New England's Regional Transmission Services are not based on an advance physical reservation system and do not use Point-to-Point or Network Integration Transmission Service.

⁷ See Order No. 676-H at 1-2.

⁸ See ISO-NE Waiver Filing at 7.

⁹ See ISO-NE Waiver Filing at 8.

specifically to the Network Integration Transmission Service requests and Service Across Multiple Systems, both of which services do not apply in New England.

Finally, ISO-NE has modified Schedule 24 of its OATT in order to incorporate by reference the NAESB WEQ Version 003 Standards, excluding those standards for which it has requested a waiver of the compliance requirement.

II. COMMENTS

The ISO-NE Waiver Filing was discussed and voted on by the NEPOOL Transmission Committee (the “Transmission Committee”) at its December 1, 2014 meeting. The Transmission Committee unanimously approved a motion to recommend support of the ISO-NE Waiver Filing to the NEPOOL Participant’s Committee (“Participants Committee”).

At its December 5, 2014 meeting, the Participant’s Committee considered and voted on the ISO-NE Waiver Filing. The Participant’s Committee unanimously supported the ISO-NE Waiver Filing. Given the nature of Regional Transmission Services in New England, NEPOOL supports the ISO-NE in its requested waivers and urges the Commission to grant the requested waivers and find the revisions to the ISO-NE OATT to be in compliance with Order 676-H.

III. CONCLUSION

For the reasons stated herein, the NEPOOL Participants Committee requests that the Commission accept the ISO-NE OATT revisions and grant the requested waivers contained in the ISO-NE Waiver Filing.

Respectfully submitted,
NEPOOL Participants Committee

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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing document to be served electronically upon each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission.

Dated at Boston, Massachusetts this 19th day of December, 2014.

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