

October 5, 2016

Patrick M. Gerity, Esq.
NEPOOL Counsel
Day Pitney LLP
242 Trumbull Street
Hartford, CT 06103

Re: NEPOOL IMAPP Process and NESCOE Comments

Dear Mr. Gerity:

Pursuant to Chair Gordon's October 2 memorandum, the undersigned members of the Consumer Advocates of New England ("CANE") write to (1) provide feedback on proposed next steps in the NEPOOL IMAPP process; and (2) comment on the September 30 NESCOE memorandum setting forth the states' positions and long-term objectives relative to the currently pending IMAPP proposals.

CANE members agree generally with the three stated long-term objectives set forth in the NESCOE memorandum. We also share certain concerns expressed in that memorandum, particularly the many jurisdictional issues surrounding any attempt by ISO-NE to administer clean energy procurements mandated by individual state policies. CANE members further believe that the accelerated schedule of the IMAPP process does not lend itself to resolution of the many complex issues involved in considering the long-term integration of wholesale markets and individual state public policies. Judicious consideration of these issues and any resultant proposals would be best accomplished after near term challenges are addressed.

CANE members suggest that the remaining time allotted for completion of the IMAPP discussions could be constructively utilized by identifying the near term challenges to the ISO-NE markets that may arise from implementation of the existing state-mandated clean energy procurements, and by proposing ways to address them. Among the most pressing challenges will be to ensure that ratepayers are not forced to "pay twice" for contracted volumes of clean energy if the contracted resources do not participate in the forward capacity market, or do not clear in the forward capacity auction.

We would appreciate your distribution of this letter to all NEPOOL Participants Committee Members and Alternates.

Sincerely,

MAURA HEALEY
ATTORNEY GENERAL

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