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October 31, 2024

Via eTariff Filing

Hon. Debbie-Anne Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: New England Power Pool - FERC Docket No. ER25-_____-000
Termination of NEPOOL Memberships

Dear Acting Secretary Reese:

The New England Power Pool (“NEPOOL”) Participants Committee¹ hereby electronically submits this transmittal letter, along with materials supporting the termination of the Participant status of the following Participants:

- ProGrid Ventures, LLC (“ProGrid”); and
- Palm Energy LLC (“Palm Energy”, and together with ProGrid, “Terminating Participants”).

I. TERMINATION OF MEMBERSHIPS: ProGrid, Palm Energy

Pursuant to Section 16.1(a) of the Second Restated NEPOOL Agreement, “[a]ny Participant shall have the right to terminate its status as a Participant upon no less than sixty (60) days’ prior written notice given to the Secretary of the Participants Committee.” Terminating Participants have provided such notice, requesting waiver of the 60 days’ notice requirement. *See* Attachments 2-3. NEPOOL requests that termination of Terminating Participants’ Participant status be made effective as of October 1, 2024. If the Commission accepts for filing the termination of Terminating Participants’ memberships, each of Terminating Participants will be excused from its obligation to pay Pool charges, and relieved of its other Pool obligations and responsibilities that might have otherwise been incurred from and after October 1, 2024.²

¹ Capitalized terms used but not defined in this filing are intended to have the same meaning given to such terms in the Second Restated New England Power Pool Agreement (the “Second Restated NEPOOL Agreement”), the Participants Agreement, or the ISO New England Inc. (“ISO-NE”) Transmission, and Markets and Services Tariff (“ISO-NE Tariff”).

² *See* Second Restated NEPOOL Agreement §§ 14.1, 14.2.

II. REQUESTED EFFECTIVE DATE

Terminating Participants have requested expedited consideration of the termination of their respective status as a Participant. Accordingly, the Participants Committee requests that the Commission waive any applicable notice requirements to permit the following effective date:

- **October 1, 2024** for the termination of the Participant status of: ProGrid and Palm Energy.³

The Participants Committee further requests that the eTariff record effective date also be set at October 1, 2024.⁴

III. ADDITIONAL SUPPORTING INFORMATION

The Participants Committee has the authority, pursuant to Section 3.1 of the Second Restated NEPOOL Agreement and Sections 8.1.3(f) and (g) of the Participants Agreement, to act on an Entity's application to become a Participant in NEPOOL. By delegation of authority, the Participants Committee has authorized the Membership Subcommittee to approve applications and terminations, which will be subject to the standard conditions, waivers and reminder established by the Participants Committee. The Membership Subcommittee reviewed the materials submitted by Terminating Participants and approved the termination of each of their respective status as a Participant in NEPOOL. Accordingly, the following materials are submitted herewith for filing:

- A changed sheet from the Second Restated NEPOOL Agreement's list of NEPOOL Participants marked to show the removal of Terminating Participants from the list of NEPOOL Participants (Attachment 1);

³ To the extent the Commission determines that certain filing requirements have not been met fully, the Participants Committee respectfully requests waiver of such requirements for the termination of Terminating Participants' Participant status be accepted as noted in Sections I and II. No party will be adversely affected by the waivers requested in these circumstances.

⁴ The Commission has relieved NEPOOL of the requirement to file changes to the NEPOOL Agreement in tariff format. *ISO New England, Inc. and New England Power Pool*, 95 FERC ¶ 61,384, 62,441–42 (2001). Accordingly, the NEPOOL Agreement has not been filed formally as an eTariff pursuant to Order No. 714. Proposed changes to the NEPOOL Agreement, however, are still required to be filed with the Commission with enough information provided to permit the Commission to view the proposed changes in the context of the composite Agreement. *Id.* at 62,442. As a matter of administrative efficiency and convenience, these materials, including Attachment 1 provided herewith marked to show the removal of Terminating Participants from the list of NEPOOL Participants, were submitted using the Commission's eTariff system. A composite list of NEPOOL Participants and a composite copy of the Second Restated NEPOOL Agreement are posted at: <https://nepool.com/library/operative-documents/>.

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- A letter from ProGrid dated September 13, 2024 requesting termination of its NEPOOL membership and its Market Participant Service Agreement with ISO-NE (Attachment 2);
- A letter from Palm Energy dated September 24, 2024 requesting termination of its NEPOOL membership and its Market Participant Service Agreement with ISO-NE (Attachment 3); and
- A list of governors and utility regulatory agencies in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont to which a copy of this filing has been sent (Attachment 4).

The materials filed herewith do not change the NEPOOL Agreement as previously filed with the Commission, other than to terminate the Participant status of ProGrid and Palm Energy in NEPOOL. Therefore, no comparisons of transactions and revenues or cost data are submitted. Existing facilities will not be impacted and no additional facilities are to be installed or modified by the Participants in connection with the termination of the Participant status of ProGrid and Palm Energy.

An electronic copy of this filing has been furnished to all the members and alternates of the Participants Committee, which represents all of the electric utilities rendering or receiving service under the ISO-NE Tariff,⁵ as well as each of the independent power producers, power marketers, power brokers, load aggregators, customer-owned utility systems, merchant transmission providers, developers, and end users that are currently Participants in the Pool. This transmittal letter and the accompanying materials have also been sent to the governors and electric utility regulatory agencies for the six New England states, which comprise the New England Control Area, to the New England Conference of Public Utilities Commissioners, Inc., and to the Executive Director of the New England States Committee on Electricity.

⁵ The Commission approved the settlement agreement pursuant to which the regional transmission organization for New England (the “RTO”) was established. *ISO New England Inc. et al.*, 109 FERC ¶ 61,147 (2004). Activation of the RTO was noticed in accordance with the settlement agreement and became effective on February 1, 2005. *ISO New England Inc. et al.*, 110 FERC ¶ 61,111 (2005) (authorizing RTO Operations).

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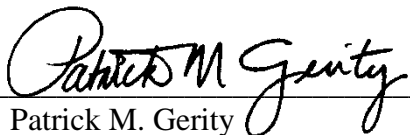
Correspondence and communications regarding this filing should be addressed as follows:

Brad Swalwell
Chair, NEPOOL Membership Subcommittee
Tangent Energy Solutions, Inc.
204 Gale Lane
Kennett Square, PA 19348-1734
Tel: 610-590-3971
Fax: 610-444-2822
E-mail: Brad.swalwell@tangentenergy.com

Patrick M. Gerity, Esq.
Counsel, NEPOOL Participants Committee
Day Pitney LLP
225 Asylum Street
Hartford, CT 06103
Tel: 860-275-0533
Fax: 860-881-2505
E-mail: pmgerity@daypitney.com

Respectfully submitted,

NEPOOL PARTICIPANTS COMMITTEE

By: 

Patrick M. Gerity
Its Counsel

Attachments

Cc: Terminating Participants
NEPOOL Participants Committee Members and Alternates
Governors and Utility Regulatory Agencies identified on Attachment 4

ATTACHMENT 1

Participant Name	Effective Date of Membership if after 6/30/2000
NRG Business Marketing, LLC	8/1/2013
NRG Curtailment Solutions, Inc.	6/1/2010
NRG Kiosk LLC (d/b/a Power Kiosk)	4/1/2022
NS Power Energy Marketing Incorporated	6/1/2019
NSTAR Electric Company	
Number Nine Wind Farm LLC	9/1/2010
Nylon Corporation of America, Inc.	10/1/2017
Ocean State BTM LLC	4/1/2021
Ocean State Power, LLC	2/1/2024
Octopus Energy LLC	4/1/2022
Old Middleboro Road Solar, LLC	8/1/2022
Ontario Power Generation Energy Trading, Inc.	5/1/2011
Ontario Power Generation Inc.	2/1/2006
OW North America LLC	3/1/2024
Oxford Energy Center, LLC	10/1/2021
Pacific Summit Energy, LLC	3/1/2014
Palm Energy LLC	2/1/2021
Palmco Power MA, LLC d/b/a Indra Energy	3/1/2012
Pascoag Utility District	
Pawtucket Power Holding Company	6/1/2007
Paxton Municipal Light Department	
Peabody Municipal Light Plant	
Peninsula Power, LLC	1/1/2015
Phillips 66 Energy Trading LLC	1/1/2024
Phoenix Energy Group, LLC	9/1/2013
Pioneer Hydro Electric Co., Inc.	11/1/2013
Plainfield Renewable Energy, LLC	5/1/2009
Plant-E Corp.	10/1/2014
PowerOptions, Inc.	
PPL TransLink, Inc.	5/1/2023
Precept Power, LLC	11/1/2023
Princeton Municipal Light Department	8/1/2007
ProGrid Ventures, LLC	6/1/2024
Protor Energy, LLC	5/1/2021
Provider Power Mass, LLC	5/1/2013
PSE US Holdings Inc.	4/1/2022
PSEG Energy Resources & Trade LLC	11/1/2000
Public Service Company of New Hampshire	
Putnam Hydropower, Inc.	3/1/2010

ATTACHMENT 2



ProGrid Ventures

9/13/2024

NEPOOL Participants Committee
c/o Sebastian M. Lombardi, Secretary
Day Pitney LLP
slombardi@daypitney.com

ISO New England Inc.
c/o Participant Support & Solutions
askiso@iso-ne.com

RE: ProGrid Ventures, LLC Notice of Intent to Terminate NEPOOL Membership and Market Participant Status

Please accept this letter as notice of termination of ProGrid Ventures, LLC's ("PROG's") NEPOOL membership and the Market Participant Service Agreement by and between PROG and ISO New England Inc (the "MPSA").¹ PROG requests that the termination of its status as a NEPOOL Participant and the termination of the MPSA be made effective as of October 1, 2024, and further requests, if and to the extent necessary, that the NEPOOL Participants Committee waive the sixty days' notice of termination of membership requirement set forth in Section 16.1(a) of the Second Restated NEPOOL Agreement.

PROG understands that this termination of NEPOOL membership must be accepted by the Federal Energy Regulatory Commission and that, until such time as it is accepted, PROG will continue to have the full rights and obligations of other Participants under the Second Restated NEPOOL Agreement.

PROG further understands that termination of the MPSA and the termination of PROG's status as a NEPOOL member does not affect any obligation of, or to, PROG arising prior to the effective date of such termination under the Second Restated NEPOOL Agreement, the Participants Agreement, or the Tariff. In particular, PROG hereby acknowledges its obligation to pay all of its NEPOOL and ISO New England Inc. expenses incurred while a NEPOOL member and participant in the New England Markets.

If you have any questions I can be reached at jshi@progridanalytics.com or 626-202-6347

Sincerely,

Jason Shi
Operations Manager

cc: Patrick M. Gerity, Esq., pmgerity@daypitney.com

Participant Name: **ProGrid Ventures, LLC**

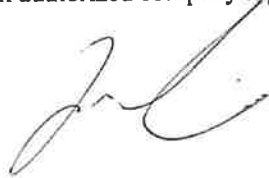
¹ The MPSA with PROG is reported by ISO New England as MPSA No. [169308].

Participant Customer Asset Management System (CAMS) ID number: **169308**

Market Participant Service Agreement (MPSA) number: **169308**

Date termination is to be effective (always on the 1st of the desired month): **10/1/2024**

Signature of an authorized company representative



Jason Shi
Operations Manager

9/18/24

ATTACHMENT 3



Florida Office, 8901 Quality Road, Bonita Springs, FL 34135
833-682-7273 www.e2companies.com

09/24/2024

NEPOOL Participants Committee
c/o Sebastian M. Lombardi, Secretary
Day Pitney LLP
slombardi@daypitney.com

ISO New England Inc.
c/o Participant Support & Solutions
askiso@iso-ne.com

RE: [Palm Energy LLC [154612]] Notice of Intent to Terminate NEPOOL Membership and Market Participant Status

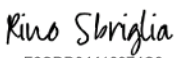
Please accept this letter as notice of termination of [Palm Energy LLC [154612]] NEPOOL membership and the Market Participant Service Agreement by and between [Palm Energy LLC] and ISO New England Inc (the "MPSA").¹ [Palm Energy LLC] requests that the termination of its status as a NEPOOL Participant and the termination of the MPSA be made effective as of [October] 1st, 2024, and further requests, if and to the extent necessary, that the NEPOOL Participants Committee waive the sixty days' notice of termination of membership requirement set forth in Section 16.1(a) of the Second Restated NEPOOL Agreement.

[Palm Energy LLC] understands that this termination of NEPOOL membership must be accepted by the Federal Energy Regulatory Commission and that, until such time as it is accepted, [Palm Energy LLC] will continue to have the full rights and obligations of other Participants under the Second Restated NEPOOL Agreement.

[Palm Energy LLC] further understands that termination of the MPSA and the termination of [Palm Energy LLC]'s status as a NEPOOL member does not affect any obligation of, or to, [Palm Energy LLC] arising prior to the effective date of such termination under the Second Restated NEPOOL Agreement, the Participants Agreement, or the Tariff. In particular, [Palm Energy LLC] hereby acknowledges its obligation to pay all of its NEPOOL and ISO New England Inc. expenses incurred while a NEPOOL member and participant in the New England Markets.

If you have any questions I can be reached at (239)-319-1097

Sincerely,

DocuSigned by:

56CDD8441097469
Rino Sbriglia
COO

cc: Patrick M. Gerity, Esq., pmgerity@daypitney.com

¹ The MPSA with [Palm Energy LLC] is reported by ISO New England as MPSA No. [].

ATTACHMENT 4

**New England Governors
and Utility Regulatory
and Related Agencies**

Oct 31, 2024

Connecticut

The Honorable Ned Lamont
State Capitol
210 Capitol Ave.
Hartford, CT 06106

Connecticut Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051-2605

Maine

The Honorable Janet T. Mills
One State House Station
Rm. 236
Augusta, ME 04333-0001

Maine Public Utilities Commission
18 State House Station
242 State Street
Augusta, ME 04333-0018

Massachusetts

The Honorable Maura Healey
Office of the Governor
Rm. 360 State House
Boston, MA 02133

Massachusetts Department of Public Utilities
One South Station
Boston, MA 02110

New Hampshire

The Honorable Christopher T. Sununu
State House
107 North Main Street
Concord, NH 03301

New Hampshire Public Utilities Commission
21 South Fruit Street
Suite 10
Concord, NH 03301-2429

Rhode Island

The Honorable Daniel J. McKee
82 Smith Street
Providence, RI 02903

Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Vermont

The Honorable Philip B. Scott
109 State Street, Pavilion
Montpelier, VT 05609

Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620-2701

**New England Governors
and Utility Regulatory
and Related Agencies**

Oct 31, 2024

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New England Conference of
Public Utilities Commissioners, Inc.
c/o Connecticut Public Utilities Authority
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George Twigg
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