

September 25, 2026

VIA E-MAIL

TO: PARTICIPANTS COMMITTEE MEMBERS AND ALTERNATES

RE: Supplemental Notice of October 2, 2026 Participants Committee Meeting

Pursuant to Section 6.6 of the Second Restated New England Power Pool Agreement, supplemental notice is hereby given that the October 2026 meeting of the Participants Committee will be held **in person on Friday, October 2, 2026, at 10:00 a.m. at the AC Hotel Portsmouth Downtown/Waterfront, located at 299 Vaughan St., Portsmouth, NH 03801**, for the purposes set forth on the attached agenda and posted with the meeting materials at nepool.com/meetings/.

To join the meeting using the enhanced Webex interface, please **download the Webex app** to your desktop or to your phone (whichever device you will be using) **in advance of the meeting** and use the app to join the meeting. You may also access the meeting through the ISO's Webex meetings page by clicking <https://iso-newengland.webex.com/webappng/sites/iso-newengland/meeting/home> and selecting the meeting (event password = **nepool**).

Although the NEPOOL room block at the AC Hotel Portsmouth is closed, please contact Laura Clark (lclark@daypitney.com; 860.275.0695) if you need a room; she may be able to assist.

Looking Ahead:

- **Thursday, November 12 Sector Meetings with ISO Board and State Official Panels** – The next Sector meetings with the ISO Board and State Officials are scheduled to be held in person on Thursday, November 12 at the Hilton Boston Back Bay (prior to the start of the Participants Committee meeting and **beginning for most Sectors at 9:00 a.m.**). ***Please work directly with your Sector's Vice-Chair to help prepare and finalize proposed agendas and any supporting material for those meetings.***
- **2027 NEPOOL Officers** – Each Sector needs to advise us, no later than **Wednesday, October 21**, of the voting member it has chosen to serve as its Sector's 2027 Participants Committee Officer. The Participants Committee will then select its 2027 Chair from among those Sector-selected Officers, using the required voting process for that selection. We have included with this notice a memorandum that provides more information about the selection process.

Respectfully yours,

/s/

Sebastian Lombardi, Secretary

FINAL AGENDA

1. To approve the draft minutes of the September 3, 2026 Participants Committee meeting. A copy of the draft minutes, marked to show the changes made since the minutes were circulated with the initial notice, is included and posted with this supplemental notice.
2. To adopt and approve the actions recommended by the Reliability Committee set forth on the Consent Agenda included with this supplemental notice and posted with the meeting materials. Consent Agenda Item No. 3 has been removed at the request of the ISO and will be considered as Item 2A (*see immediately below*).
- 2A. To consider, and take action, as appropriate, on revisions to Planning Procedure 5-6 (Interconnection Planning Procedure for Generation and Elective Transmission Upgrades). This item was removed from the Consent Agenda (Consent Agenda Item 3). Background materials and a draft resolution are included and posted with this supplemental notice.
3. To receive summaries of the ISO Board and Board Committee meetings held since the last summaries were circulated. The summaries are included and posted with this supplemental notice.
4. To receive a System and Market Operations Report. The October System and Market Operations Report, reflecting September data, will be circulated and posted in advance of the meeting.
5. To receive an ISO Draft 2027 Work Plan Report. A 2027 Annual Work Plan presentation is included and posted with this supplemental notice.
6. To consider, and take action, as appropriate, on the following proposed budgets:
 - a. 2027 ISO-NE Operating and Capital Budgets; and
 - b. 2027 NESCOE budget.Background materials and draft resolutions are included and posted with this supplemental notice.
7. To consider, and take action, as appropriate, on the membership application of the Environmental League of Massachusetts, Inc. Background materials and a draft resolution are included and posted with this supplemental notice.
8. To receive a report on current contested matters before the FERC and the Federal Courts. The litigation report will be circulated and posted in advance of the meeting.
9. To receive reports from Committees, Subcommittees and other working groups:

• Markets Committee	• Budget & Finance Subcommittee
• Reliability Committee	• Membership Subcommittee
• Transmission Committee	• Others
10. Administrative matters.
11. To transact such other business as may properly come before the meeting.

MEMORANDUM

TO: NEPOOL Participants Committee Members and Alternates
FROM: Pat Gerity, NEPOOL Counsel
DATE: September 18, 2026
RE: 2027 Participants Committee Officer Elections

In order to ensure that the selection process requirements in the Participants Committee Bylaws for 2027's Participants Committee officers can be timely completed, each Sector needs to identify, no later than **Wednesday, October 21, 2026**, who the Sector has selected to serve as the Sector's Participants Committee officer for 2027. A description of the qualifications, responsibilities, and expectations of the Sector officers selected has been included with this memorandum.

By way of reminder, the Bylaws require that one voting member from each Sector be selected by a majority of all the voting members in its Sector (i) to serve as a nominee for Chair of the Participants Committee and (ii) if not elected Chair, to serve as a Participants Committee Vice-Chair. A confidential, written balloting process will then be conducted to elect the 2027 Chair from among the Participants Committee officers selected by each of the Sectors. To allow time for that balloting process ahead of the December 2 Annual Meeting, as required by the Bylaws, we need the Sectors' officers to be identified by October 21, 2026.

If any Sector needs assistance in conducting a vote for its Sector officer, please let us know (preferably no later than October 14). We would be pleased to help however we can. Also, if you have any questions, please contact me at pmgerity@daypitney.com or (860) 275-0533.

***Participants Committee Sector Officer
Qualifications, Responsibilities and Expectations***

Qualifications: A Participants Committee Chair or Vice-Chair must be a voting member of the Participants Committee. Per the Participants Committee Bylaws, one voting member from each active Sector of the Participants Committee is to be selected to serve as the Vice-Chair of the Sector “by a majority of all the voting members in its Sector.” The Chair is selected from among the nominated Vice-Chairs using the balloting procedures in the Bylaws.

Responsibilities and Expectations of Participants Committee Sector Vice-Chairs:

1. Help to build and maintain a collegial and productive working relationship with other Committee officers and members, ISO management, and New England State officials participating in Committee activities.
2. Communicate routinely and effectively with other members of the Sector:
 - a. To help ensure that members have the information needed to support informed and active Committee participation;
 - b. To ensure that the officer has sufficient information to provide to the other officers, ISO management and staff, and state and federal officials a fair and objective report of Sector members’ positions and sensitivities on regional matters; and
 - c. To report objectively to Sector members information, questions, positions, perspectives, and sensitivities of or from the other Sectors, the ISO, and state and federal officials that are provided to the Officer to be shared with the Sector.
3. Attend and lead or support planning for and participation in Participants Committee meetings, including (a) participation in planning conference calls and in-person meetings to identify and confirm Committee meeting agenda topics and materials, meeting logistics and orderly flow of business at Committee meetings, and (b) serving as Chair if and as needed for a meeting or portions of a meeting at which the Chair is not able to preside.
4. Coordinate and organize Sector members when appropriate, including for meaningful participation by the Sector members in the semi-annual meetings with the ISO Board of Directors, New England State officials and FERC representatives.
5. Ensure that the Sector is fairly and objectively represented at other committee and working group meetings and meetings among Officers, ISO management and New England State officials, and that the Officer or representative is reasonably informed as to the perspectives and sensitivities of the Sector members.
6. With the other NPC Officers, review and comment on NEPOOL filings or pleadings, raising awareness of any Sector-specific sensitivities.
7. Serve, or designate an appropriate Sector member to serve, on the Joint Nominating Committee that recommends to the Participants Committee for endorsement a slate of candidates for membership on the ISO Board of Directors.

PRELIMINARY

Pursuant to notice duly given, a meeting of the NEPOOL Participants Committee was held beginning at 10:00 a.m. on Thursday, September 3, 2026, at the Portland Sheraton at Sable Oaks in South Portland, Maine. A quorum, determined in accordance with the Second Restated NEPOOL Agreement, was present and acting throughout the meeting. Attachment 1 identifies the members, alternates, and temporary alternates who participated in the meeting.

Ms. Sarah Bresolin, Chair, presided, and Mr. Sebastian Lombardi, Secretary, recorded. Ms. Bresolin welcomed the members, alternates and guests who were present, including Maine Public Utilities Commission Chair Philip Barlett, and Commissioners Patrick Scully and Carolyn Gilbert. She thanked each of the Maine Commissioners for their continued engagement with NEPOOL.

APPROVAL OF AUGUST 6, 2026 MINUTES

Ms. Bresolin referred the Committee to the preliminary minutes of the August 6, 2026 meeting, as circulated and posted in advance of the meeting. Following motion duly made and seconded, the preliminary minutes of that meeting with additional non-material clarifications were approved unanimously, with an abstention by Mr. Jon Lamson noted.

CONSENT AGENDA

Ms. Bresolin then referred the Committee to the Consent Agenda that was circulated and posted in advance of the meeting. Following motion duly made and seconded, the Consent Agenda was approved unanimously, with an abstention by Mr. Lamson noted.

ISO BOARD & BOARD COMMITTEE SUMMARIES

Ms. Bresolin then referred the Committee to the summaries of the ISO Board & Board Committee meetings held since the last Participants Committee meeting, which had been circulated and posted in advance of the meeting. There were no questions or comments on those summaries.

ISO Strategic Plan Update

Dr. Vamsi Chadalavada, ISO Chief Executive Officer (CEO), provided an update on the ISO's work to revise its strategic plan. He explained that the ISO was reassessing its longer-term planning approach in light of a number of uncertainties, including the following: supply entry, permitting and logistics; the pace of electrification and potential growth of large loads; tightening system margins and affordability concerns; more extreme weather; greater uncertainty regarding assistance from neighboring regions; and increasingly sophisticated cybersecurity threats.

Dr. Chadalavada reported that, against that backdrop, the ISO was developing a portfolio of initiatives and goals to be evaluated and delivered over shorter long-term timeframes, the first by 2032. He expected that additional details would be ready for presentation and feedback at both the November 10 open ISO Board meeting and November 12 Participants Committee meeting, with materials expected to be published in January. He emphasized that the strategic plan, which he hoped would be clear, direct and candid, would be a "living document", one that would be adapted and updated as circumstances change, supporting confidence in New England's markets and ensuring New England's long-term success.

In response to a member's question as to how artificial intelligence (AI) would be incorporated into the strategic plan, Dr. Chadalavada said that the ISO viewed AI less as an initiative in and of itself and more as a key capability that would support and enable the ISO's

progress on its strategic plan. Another member emphasized the importance of including as a core element of the ISO's revised strategic plan the strengthening of confidence in wholesale markets. He strongly implored the ISO to serve, not just as an administrator, but as a guardian of sound market design and champion for competitive markets.

ISO SYSTEM & MARKET OPERATIONS REPORT

Mr. Stephen George, ISO Vice President of System & Market Operations and Capital Projects, referred the Committee to the September System & Market Operations Report (Report), which had been circulated and posted in advance of the meeting. He reviewed Report highlights (noting that data in the Report was through August 26, 2026), which included: (i) the Peak Hour for August 2026, with 24,191 MW of Revenue Quality Metered (RQM) Data, occurred on August 7, 2026 during the hour ending at 6:00 p.m. (meaning, with the end of summer approaching, the peak for 2026 was likely set on July 2 at 25,832 MW); (ii) August averages for Day-Ahead Hub Locational Marginal Price (LMP) (\$52.81/MWh), Real-Time Hub LMP (\$57.08/MWh), and natural gas prices (\$2.30/MMBtu); (iii) Energy Market value for August 2026 was \$591 million, down 27% from July 2026 and up 17% from August 2025; (iv) Ancillary Markets value (\$8 million) was down 53% from July 2026 and 43% from August 2025; (v) average Day-Ahead cleared physical energy during peak hours as a percentage of forecasted load was up from August 2025 and down from July 2026; (vi) Net Commitment Period Compensation (NCPC) payments for August totaled \$2.2 million (representing 0.4% of August's monthly Energy Market value), comprised of \$2.2 million in First Contingency payments (including \$718,000 in Dispatch Lost Opportunity Costs, \$291,000 in Rapid Response Pricing Opportunity Costs, \$95,000 paid to resources at external locations, down \$34,000 from July, and less than

\$1,000 paid to Real-Time Deviations); and (vii) a Forward Capacity Market (FCM) value of \$77 million.

Using slides from the Report, Mr. George then (i) reviewed specifics from the August 7, 2026 M/LCC-2 (Abnormal Conditions Alert) event (during which peak system load reached 23,702 MW in the hour ending at 7:00 p.m.), (ii) noted that, in connection with the DAAS Market and subject to further confirmation, the updates made effective August 1, 2026 appeared to be ~~workperform~~ing as expected, (iii) highlighted the year-over-year growth in offshore wind, which had increased by approximately 70% from August 2025 (noting that on August 30, 2026, hour ending 23:00, the region's three offshore wind resources produced a combined all-time high output of approximately 930 MW); and (iv) noted the continuing enhancements to the Report.

In response to questions on the data for offshore wind resources, Mr. George said that the capacity factors were generally expected to be lower in the summer and higher in the winter. He said the ISO would continue to monitor those resources' readiness and performance in the coming months, particularly in the winter, and would be in a position to address the data in more detail thereafter.

Turning to planned transmission and generation outages, Mr. George highlighted the following scheduled transmission outages: (i) a Phase 2 outage (from October 5, 2026 through November 2, 2026) (reducing Phase 2 Total Transfer Capability (TTC) to 0 MW for that period); (ii) a 12-day outage of the New England Clean Energy Connect (NECEC) (scheduled from November 5, 2026 through November 17, 2026); and (iii) a 5-day outage of the 390/3016 tie between Orrington, Maine and Point Lepreau, New Brunswick (scheduled from November 16, 2026 through November 20, 2026). Each were expected to affect TTC into and out of New England. Mr. George confirmed in response to a question that the 390/3016 outage was for

routine maintenance, and noted that the planned return date for a New Brunswick generator then out of service remained an estimate based on the ISO's latest information.

2027 ISO AND NESCOE BUDGETS

Mr. Tom Kaslow, Budget & Finance (B&F) Subcommittee Chair, referred the Committee to the materials circulated and posted in advance of the meeting related to the proposed 2027 ISO and New England States Committee on Electricity (NESCOE) Budgets. He reported that the 2027 budgets had been presented at the August 7, 2026 B&F Subcommittee meeting, with no concerns or objections expressed with respect to the proposed budgets.

2027 ISO Budgets

Ms. Kelly Reyngold, ISO Vice President and Chief Financial Officer, reported that the proposed 2027 ISO Operating Budget, before the annual true-up, totaled approximately \$350 million, inclusive of costs associated with the Asset Condition Reviewer (ACR) function. The proposal was approximately \$1.3 million below the preliminary estimate presented at the June Summer Meeting. She attributed the reduction primarily to lower projected salaries for planned new hires, a greater allocation of employee time to capital projects, employee time charged to reimbursable studies, and lower projected employee benefit costs.

Addressing capital project governance, Ms. Reyngold explained that the project scope, timing and estimated costs continue to develop as the design work progresses. She reported that the ISO authorized project funding through its established governance process, remained within approved budget amounts and reported quarterly to the B&F Subcommittee on material changes. Unspent funds, including funds associated with the ACR function or a potential second longer-term transmission planning study, would be returned through the true-up process.

Ms. Reyngold then highlighted potential risks to the [accuracy of](#) Budget projections, including cybersecurity exposure, volatile technology costs, increased AI and cloud usage, regulatory and policy changes, labor-market conditions and inflation. She noted that the ISO used contingency funding and dedicated financial operations governance to monitor cloud and AI costs and would reprioritize work if costs exceeded available contingency.

Ms. Reyngold stated that state agencies had until September 7, 2026 to submit comments regarding the Budget. She reported that the ISO expects to review the Budget with its Board later in September, respond to comments approximately one week later and provide projected Schedules 1, 2 and 3 [rates](#) around the same time, adding that the ISO would explore whether AI could help accelerate the rate calculation process. Ms. Reyngold stated that the ISO expects to return to the Participants Committee at its October 2, 2026 meeting for a vote, and to file the Budget with the FERC by October 15, 2026.

In response to a member's question, Ms. Reyngold confirmed that the smaller projected true-up would increase the overall rate impact relative to the prior year. She explained that the true-up reflected in the 2027 budget (\$7 million), reflecting both underspending and Tariff collections, was smaller than the true-up reflected in the 2026 budget (\$15 million).

Ms. Reyngold also provided an update on the ISO's new Holyoke facility, reporting that financing and permitting had been secured, demolition was beginning and groundbreaking was expected in approximately one month. She also reported that the ISO continued to target the first quarter of 2028 for occupancy of the new facility.

2027 NESCOE Budget

Turing to the 2027 NESCOE budget, Ms. Bresolin referred members to the materials circulated in advance of the meeting and indicated that Ms. Heather Hunt, NESCOE Executive Director, was available to answer any questions. In response to a question regarding the expiration of NESCOE's current five-year *pro forma* budget noted in the materials, Ms. Hunt explained that, following past practice, NESCOE would develop and present a new five-year *pro forma* in the spring of 2027, which would then be filed with the FERC and in turn inform the presentation and consideration of NESCOE's 2028 Budget. There were no further questions or comments regarding the 2027 NESCOE Budget materials.

FINANCIAL ASSURANCE POLICY CHANGES (OPINION 594 ROE REFUNDS)

Mr. Kaslow referred the Committee to the materials circulated and posted in advance of the meeting regarding proposed revisions to the Financial Assurance Policy (FAP) to address resettlements related to the Return on Equity (ROE) refunds required by FERC Opinion ~~No.~~ 594 (FAP Changes). He explained that Opinion 594 required the New England Transmission Owners (TOs) to apply a replacement base ROE beginning in October 2014, and to provide refunds with interest. Mr. Kaslow explained that because of the atypical impact of the resulting resettlements on the TOs' financial assurance obligations, the ISO had asked the B&F Subcommittee to review the FAP Changes.

Mr. Kaslow reported that the B&F Subcommittee considered the FAP Changes at its August 25, 2026 meeting. Members asked clarifying questions, but expressed no concerns or objections. In response to a question regarding timing, ISO representatives stated that the ISO planned to file the FAP Changes with the FERC in the fall and would seek an effective date

before January 11, 2027, when the refunds were expected to begin flowing through the settlements process.

There being no further questions or discussion, the following motion was duly made, seconded and approved unanimously, with an abstention by Mr. Lamson noted:

RESOLVED, that the Participants Committee supports the revisions to the ISO New England Financial Assurance Policy to address the treatment of resettlements related to FERC Opinion No. 594 ROE refunds, as reflected in the materials circulated to this Committee in advance of this meeting, together with such non-substantive changes as may be approved by the Chair of the Budget & Finance Subcommittee.

LITIGATION REPORT

Mr. Lombardi referred the Committee to the September 1, 2026 Litigation Report that had been circulated and posted before the meeting. He reported that several ISO and NEPOOL filings remained pending before the FERC, including changes related to the Day-Ahead Ancillary Services market, the treatment of system-backed exports, the Balancing Ratio Cap compliance proceeding and the ACR role. He also reported that the FERC had earlier that week accepted the reduction to the Payment Performance Rate.

Mr. Lombardi also reported that the FERC had granted the joint motion by the ISO and Participating Transmission Owners Administrative Committee (PTO AC) to hold the New England Large and Co-Located Show Cause proceeding in abeyance for 90 days; the deadline for filing proposed Tariff changes, or responses, had been extended to November 16, 2026, which he noted would support the anticipated stakeholder process as well as Participants Committee action at its November 12, 2026 meeting.

Finally, in an update regarding the FERC's PJM governance and stakeholder process reforms proceeding, Mr. Lombardi noted that post-technical conference comments had been filed on August 21, 2026, and interested parties were meeting in Washington, D.C. that week with the FERC's Dispute Resolution Services, which was mediating discussions on possible reforms. In response to a member's question, Mr. Lombardi reported that some of the post-technical conference comments had identified elements of New England's governance and stakeholder process as potential models for PJM reforms.

COMMITTEE REPORTS

Markets Committee (MC). Ms. Emily Laine, MC Chair, reported that the next MC meeting would be held the following week, September 8-10, 2026, with most of the meeting conducted as a joint meeting of the MC, RC and TC to consider the Capacity Auction Reforms: Seasonal/Accreditation (CAR-SA) proposal, including proposed stakeholder amendments.

Reliability Committee (RC). Mr. Frank Etori, RC Vice-Chair, reported that the RC would be held by Webex on September 16, 2026. The RC expected to vote on several Operating and Planning Procedures and continue its discussion of changes to Planning Procedure No. 4.

Transmission Committee (TC). Mr. Dave Burnham, TC Vice-Chair, reported that the next TC meeting would be held in person on September 15, 2026 at the DoubleTree Hotel in Westborough, MA at which the TC was scheduled to discuss the ISO's response to the Large and Co-Located Loads Show Cause Order and receive an introductory presentation on the ISO's compliance with FERC Order 1920. Mr. Burnham also directed members to a memo circulated the night before describing the remaining stakeholder process for the Large and Co-Located Loads project, which included notice of two additional joint MC/RC/TC meetings scheduled for October 27, 2026 and November 3, 2026, with Technical Committee votes on the Large and Co-

Located Loads project targeted for the November 3, 2026 meeting. He directed members to the ISO [and NEPOOL](#) calendars for further details.

Budget & Finance Subcommittee. Mr. ~~Tom~~ Kaslow, ~~B&F Subcommittee Chair~~, reported that the next B&F Subcommittee meeting would be held by Webex on September 22, 2026. The main topics of discussion were expected to include CAR-SA related revisions to the FAP and Billing Policy.

Membership Subcommittee. Mr. Brian Thomson, Membership Subcommittee Chair, reported that the next Membership Subcommittee meeting would be held virtually on September 14, 2026, with six membership applications and no terminations expected to be considered. He encouraged all those interested to participate.

ADMINISTRATIVE MATTERS

Ms. Bresolin reported that the next Participants Committee meeting would be held in person, on Friday, October 2, 2026, at the AC Hotel Portsmouth Downtown/Waterfront in Portsmouth, New Hampshire. She also noted that the November 12, 2026 Participants Committee meeting would be held in person at the Hilton Boston Back Bay in Boston, MA, and the December 3, 2026 Participants Committee meeting would be held in person at the Colonnade Hotel in Boston, MA.

Mr. Lombardi reported that the November 12, 2026 meeting day would begin at 9:00 a.m. with Sector meetings involving ISO Board panels and State officials, and the Participants Committee meeting would begin at 2:00 p.m. that day. He emphasized that the November meeting would be held on the second (rather than the typical first) Thursday of the month.

There being no other business, the meeting adjourned at 10:57 a.m.

Respectfully submitted,

Sebastian Lombardi, Secretary

**PARTICIPANTS COMMITTEE MEMBERS AND ALTERNATES
PARTICIPATING IN THE SEPTEMBER 3, 2026 MEETING**

PARTICIPANT NAME	SECTOR/GROUP	MEMBER NAME	ALTERNATE NAME	PROXY
Acadia Center	End User	Joe LaRusso		
Advanced Energy United	Assoc. Non-Voting		Alex Lawton (W)	
Ashburnham Municipal Light Plant	Publicly Owned Entity			Dan Murphy (W)
AVANGRID (CMP/UI)	Transmission	Alan Trotta (W)	Jason Rauch	
Bath Iron Works	End User			Bill Short
Belmont Municipal Light Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Block Island Utility District	Publicly Owned Entity	Dave Cavanaugh (W)		Michael Lazorchak
Boylston Municipal Light Department	Publicly Owned Entity			Dan Murphy (W)
BP Energy Company (BP)	Supplier		Christine Huhgey (W)	José Rotger
Braintree Electric Light Department	Publicly Owned Entity	Dave Cavanaugh (W)		Michael Lazorchak
Brookfield Energy Trading and Marketing LLC	Supplier	Aleks Mitreski (W)		
Chester Municipal Light Department	Publicly Owned Entity		Dan Murphy (W)	
Chicopee Municipal Lighting Plant	Publicly Owned Entity			Dan Murphy (W)
Clear River Electric	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
CLEAResult Consulting Inc.	AR-DG	Tamera Oldfield (W)		
Clearway Power Marketing LLC	Supplier			Pete Fuller (W)
Concord Municipal Light Plant	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Connecticut Municipal Electric Energy Coop.	Publicly Owned Entity	Brian Forshaw (W)		
Connecticut Office of Consumer Counsel	End User		Jamie Talbert-Slagle (W)	
Conservation Law Foundation	End User	Nick Krakoff (W)		
Constellation Energy Generation (Constellation)	Supplier	Andy Gillespie (W)	Gretchen Fuhr	
Cranberry Point Energy Storage, LLC	AR-DG	Mandy Meadors (W)		
Cross-Sound Cable Company (CSC)	Supplier		José Rotger	
Danvers Electric Division	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Dartmouth Power Associates, L.P.	Generation			Sarah Yasutake (W)
Dominion Energy Generation Marketing, Inc.	Generation	Wes Walker (W)		
DTE Energy Trading, Inc. (DTE)	Supplier			José Rotger
Elektrisola, Inc.	End User			Bill Short
ENGIE Energy Marketing NA, Inc.	AR-RG	Sarah Bresolin		
Eversource Energy	Transmission		Dave Burnham	
First Point Power	Supplier	Peter Schieffelin (W)		
FirstLight Power Management, LLC	Generation	Tom Kaslow		
Fiscal Alliance Foundation, Inc.	End User			Lisa Linowes (W)
Gabel Associates, Inc.	Supplier	Sarah Yasutake (W)		
Galt Power, Inc.	Supplier	José Rotger	Jeff Iafrati (W)	
Garland Manufacturing Company	End User			Bill Short
Generation Bridge Companies	Generation		Steve Kirk	
Generation Group Seat	Generation		Abby Krich (W)	
Georgetown Municipal Light Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Green Oceans	End User			Lisa Linowes (W)
Groton Electric Light Department	Publicly Owned Entity			Dan Murphy (W)
Grid United LLC	Provisional Member	Mike Spector		
Groveland Electric Light Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Hammond Lumber Company	End User			Bill Short
Harvard Dedicated Energy Limited	End User			Doug Hurley (W)
High Liner Foods (USA) Inc.	End User		Bill Short	
Hingham Municipal Lighting Plant	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Holden Municipal Light Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Holyoke Gas & Electric Department	Publicly Owned Entity			Dan Murphy (W)
H.Q. Energy Services (US)	AR-RG	Louis Guilbault (W)		
Hudson Light and Power Department	Publicly Owned Entity			Dave Cavanaugh (W)
Hull Municipal Lighting Plant	Publicly Owned Entity			Dan Murphy (W)

**PARTICIPANTS COMMITTEE MEMBERS AND ALTERNATES
PARTICIPATING IN THE SEPTEMBER 3, 2026 MEETING**

PARTICIPANT NAME	SECTOR/GROUP	MEMBER NAME	ALTERNATE NAME	PROXY
Industrial Wind Action Corp	End User	Lisa Linowes (W)		
Ipswich Municipal Light Department	Publicly Owned Entity			Dan Murphy (W)
Lamson, Jon	End User	Jon Lamson (W)		
Littleton (MA) Electric Light and Water Dept.	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Long Island Power Authority (LIPA)	Supplier	Bill Kilgoar (W)		
Maine Power LLC	Supplier	Jeff Jones		
Maine Public Advocate's Office	End User	Drew Landry		
Mansfield Municipal Electric Department	Publicly Owned Entity			Dan Murphy (W)
Marble River, LLC	Supplier	John Brodbeck (W)		
Marblehead Municipal Light Department	Publicly Owned Entity			Dan Murphy (W)
Mass. Attorney General's Office (MA AG)	End User	Jackie Bihle	Jamie Donovan (W)	
Mass. Bay Transportation Authority	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Mass. Department of Capital Asset Management	End User		Paul Lopes (W)	
Mass. Municipal Wholesale Electric Company	Publicly Owned Entity		Dan Murphy (W)	
MDC – The (CT) Metropolitan District	Publicly Owned Entity		Dave Cavanaugh (W)	
Mercuria Energy America, LLC	Supplier			José Rotger
Merrimac Municipal Light Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Midcoast Regional Redevelopment Authority	Publicly Owned Entity		Dave Cavanaugh (W)	
Middleborough Gas & Electric Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Middleton Municipal Electric Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Moore Company	End User			Bill Short
New England Power (d/b/a National Grid)	Transmission	Tim Brennan (W)	Tim Martin	
New England Power Gens. Assoc. (NEPGA)	Assoc. Non-Voting	Bruce Anderson	Dan Dolan	Molly Connors (W)
New Hampshire Electric Cooperative	Publicly Owned Entity			Brian Forshaw (W)
New Hampshire Office of Consumer Advocate	End User	Matthew Fossum		
NextEra Energy Resources, LLC	Generation	Michelle Gardner		
North Attleborough Electric Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Norwood Municipal Light Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Nylon Corporation of America	End User			Bill Short
Pawtucket Power Holding Company	Generation	Dan Allegretti		
Paxton Municipal Light Department	Publicly Owned Entity			Dan Murphy (W)
Peabody Municipal Light Department	Publicly Owned Entity			Dan Murphy (W)
PowerOptions, Inc.	End User			Doug Hurley (W)
Princeton Municipal Light Department	Publicly Owned Entity			Dan Murphy (W)
Reading Municipal Light Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
RENEW Northeast, Inc.	Assoc. Non-Voting	Francis Pullaro (W)		Carter Scott
Rhode Island Energy (Narragansett Electric Co.)	Transmission	Brian Thomson	Robin Lafayette (W)	
Rowley Municipal Lighting Plant	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Russell Municipal Light Dept.	Publicly Owned Entity			Dan Murphy (W)
Saint Anselm College	End User			Bill Short
Shell Energy North America (US), L.P.	Supplier	Jeff Dannels		
Shipyard Brewing LLC	End User			Bill Short
Shrewsbury Electric & Cable Operations	Publicly Owned Entity			Dan Murphy (W)
South Hadley Electric Light Department	Publicly Owned Entity			Dan Murphy (W)
Sterling Municipal Electric Light Department	Publicly Owned Entity			Dan Murphy (W)
Stowe Electric Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
Taunton Municipal Lighting Plant	Publicly Owned Entity		Dave Cavanaugh (W)	
Templeton Municipal Lighting Plant	Publicly Owned Entity			Dan Murphy (W)

**PARTICIPANTS COMMITTEE MEMBERS AND ALTERNATES
PARTICIPATING IN THE SEPTEMBER 3, 2026 MEETING**

Veolia Flexible Energy Services North America	AR-LR	Doug Hurley (W)		
Vermont Electric Company	Transmission	Frank Ettori		
Vermont Energy Investment Corp.	AR-LR			Doug Hurley (W)
Vermont Public Power Supply Authority	Publicly Owned Entity			Brian Forshaw (W)
Versant Power	Transmission	Dave Norman	Stephen Johnston	
Village of Hyde Park (VT) Electric Department	Publicly Owned Entity	Dave Cavanaugh (W)		
Vistra (Dynegy Marketing and Trade, Inc.)	Generation	Ryan McCarthy		
Vitol Inc.	Supplier	Seth Cochran (W)		
Wakefield Municipal Gas & Light Department	Publicly Owned Entity			Dan Murphy (W)
Wallingford DPU Electric Division	Publicly Owned Entity		Dave Cavanaugh (W)	
Wellesley Municipal Light Plant	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
West Boylston Municipal Lighting Plant	Publicly Owned Entity			Dan Murphy (W)
Westfield Gas & Electric Department	Publicly Owned Entity		Dave Cavanaugh (W)	Michael Lazorchak
ZTECH, LLC	End User			Bill Short

CONSENT AGENDA

Reliability Committee (RC)

*From the previously-circulated notice of RC actions at the **September 16, 2026 RC Meeting**, dated September 16, 2026.¹*

1. Revisions to OP-21 (Data Usage Clarifications and Survey Updates)

Support revisions to ISO New England Operating Procedure (OP) No. 21 (Operational Surveys, Energy Forecasting & Reporting and Actions During an Energy Emergency),² as recommended by the RC at its September 16, 2026 meeting, together with such non-material changes as may be approved by the RC Chair and Vice-Chair.

The motion to recommend Participants Committee support was approved unanimously.

2. Revisions to PP5-1 and PP5-3 (Proposed Plan Application (PPA) Process Enhancements)

Support revisions to ISO New England Planning Procedure (PP) No. 5-1 (Procedure for Review of Market Participant's or Transmission Owner's Proposed Plans) and PP No. 5-3 (Guidelines for Conducting and Evaluating PPA Analyses),³ as recommended by the RC at its September 16, 2026 meeting together with such non-material changes as may be approved by the RC Chair and Vice-Chair.

The motion to recommend Participants Committee support was approved unanimously.

3. REMOVED FROM CONSENT AGENDA; SEE DISCUSSION ITEM #2A

Revisions to PP5-6 (Revisions to Support First Full Cluster Study and Other Conforming Changes)

Support revisions to PP No. 5-6 (Interconnection Planning Procedure for Generation and Elective Transmission Upgrades),⁴ as recommended by the RC at its September 16, 2026 meeting together with such non-material changes as may be approved by the RC Chair and Vice-Chair.

The motion to recommend Participants Committee support was approved unanimously.

¹ RC Notices of Actions are posted on the ISO-NE website at: <https://www.iso-ne.com/committees/reliability/reliability-committee/?document-type=Committee%20Actions>.

² The OP-21 changes include revisions to clarify the use of generator fuel and emissions survey responses for capacity accreditation and for IMM reference level calculations, and to improve ISO-NE situational awareness through more precise survey questions related to fuel deliveries and access to demineralized water or ammonia.

³ The PP5-1 and PP5-3 changes include revisions to: (i) enhance and clarify the PPA review process (including clarifying expectations regarding the level of analysis and required documentation); (ii) update existing forms (to a fillable PDF format with enhanced fields); and (iii) add a load PPA form and describe the changes made to a load facility that would require the submission of a load PPA.

⁴ The PP5-6 changes include revisions to: (i) update reactive power requirements and power factor evaluation methodology for use in the first Cluster Study and subsequent Interconnection Studies; (ii) revise model acceptance tests and add a new attestation requirement related to ISO-NE's adoption of certain clauses of IEEE 2800-2022; (iii) refine the scenarios that may be assessed for steady-state and stability analyses; (iv) specify base network topology resource assumptions used for Cluster Studies, including treatment of Resource deactivations, state jurisdictional projects, and transmission projects that are under study; and (v) reflect miscellaneous clean-up revisions.

MEMORANDUM

TO: NEPOOL Participants Committee

FROM: Pat Gerity, NEPOOL Counsel

DATE: September 25, 2026

RE: NPC Vote on PP5-6 Revisions

You will be asked at the October 2, 2026 Participants Committee meeting to vote on proposed revisions to ISO Planning Procedure 5-6¹ (“PP5-6 Revisions”). The Reliability Committee unanimously recommended Participants Committee support for the PP5-6 Revisions (with the exception of a newly-identified additional ISO-proposed change) at its September 16, 2026 meeting. For the reasons more fully explained in the ISO’s voting memo included with this memorandum, the PP5-6 Revisions have been pulled from the Consent Agenda to allow for the PP5-6 Revisions to be supported with the additional change. Materials supporting consideration of the PP5-6 Revisions are included (or linked to) in the materials circulated and posted with the supplemental materials.

Specifically, in addition to the unanimously recommended PP5-6 Revisions, the ISO has identified the need to update a parameter for one of the new model acceptance tests (Test 17 – Consecutive Voltage Deviation) in PP5-6 Appendix C-2. The ISO states that this update does not materially change how the new model acceptance tests are performed.

The following resolution could be used for Participants Committee consideration of the PP5-6 Revisions:

RESOLVED, that the Participants Committee supports the PP5-6 Revisions, as circulated to the Participants Committee in advance of its October 2, 2026 meeting, together with [any changes agreed to at the meeting and] such non-substantive changes as may be agreed to after the meeting by the Chair and Vice-Chair of the Reliability Committee.

¹ The PP5-6 changes include revisions to: (i) update reactive power requirements and power factor evaluation methodology for use in the first Cluster Study and subsequent Interconnection Studies; (ii) revise model acceptance tests and add a new attestation requirement related to ISO-NE’s adoption of certain clauses of IEEE 2800-2022; (iii) refine the scenarios that may be assessed for steady-state and stability analyses; (iv) specify base network topology resource assumptions used for Cluster Studies, including treatment of Resource deactivations, state jurisdictional projects, and transmission projects that are under study; and (v) reflect miscellaneous clean-up revisions.



memo

To: NEPOOL Participants Committee (PC)

From: Pradip Vijayan, Senior Manager, Modeling and Integration

Date: September 25, 2026

Subject: ISO New England Planning Procedure No. 5-6

The ISO is requesting a vote by the PC on revisions to ISO New England Planning Procedure No. 5-6 – Interconnection Planning Procedure for Generation and Elective Transmission Upgrades (PP5-6). The proposed revisions provide clarity around the requirements for inverter-based resources participating in the first Cluster Study. The opening of the first Cluster Request Window is on October 5, 2026. These proposed revisions were unanimously supported by the Reliability Committee (RC).¹

Following the RC's recommendation for PC support, the ISO has identified the need to update a parameter for one of the new model acceptance tests (Test 17 – Consecutive Voltage Deviation) in PP5-6, Appendix C-2. By way of background, PP5-6, Appendix C-2 details the model acceptance tests that are required to support an Interconnection Request. The proposed revisions supported by the RC add three new model acceptance tests that evaluate the conformance of inverter-based resources with the ISO-adopted clauses of IEEE 2800-2022.

The ISO has identified that the new model acceptance Test 17 inadvertently specified a short circuit ratio (SCR) of infinity. To correct this, the ISO is updating the new model acceptance Test 17 by specifying testing at a SCR of 2.5 and 20, respectively, which aligns with similar RC-supported Appendix C-2 model acceptance tests. This update does not materially change how the new model acceptance tests are performed.

The proposed revisions to PP5-6 for the PC's consideration have been presented at the RC meeting dates outlined below:

- July 23, 2026; [agenda item #6.3](#)
- August 18-19, 2026; [agenda item #12.3\(a\)](#)
- September 16, 2026; [agenda item #6.3](#)

¹ [September 16, 2026 RC Actions Letter](#)

Appendix C-2
Model Acceptance Tests for Inverter-Based Resources (IBR)
Revision 2.0

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Section 1

Introduction

The positive sequence and electromagnetic transient (EMT) model submittals in support of an Interconnection Request, or subsequent changes to the models, must be accompanied by model acceptance tests (MAT). This document outlines dynamic performance and benchmarking requirements, applicable tests, and the procedures for conducting these tests.

1.1 Scope of Model Acceptance Tests

To assess the consistency, accuracy, and dynamic performance of the models provided in support of an Interconnection Request (IR), a series of tests shall be conducted in a single machine infinite bus (SMIB) system bounded by low and relatively high short circuit ratio (SCR)¹ conditions. Additionally, the tests verify the IBR plant model's ability to demonstrate compliance with the IEEE 2800 sub-clauses adopted by PP5-6 Appendix F, and the performance requirements noted below reflect these sub-clauses. While the Appendix F requirements only apply to IBR plants starting with the first Cluster Study and subsequent Interconnection Studies, the tests provided in the Appendix will be performed for model reviews of IBR plants that interconnected prior to the first Cluster Study as well. In the case of the latter, for tests that specifically reference IEEE 2800, the performance requirements employed will be relaxed to reflect the applicable performance requirements for the interconnection study associated with the IBR plant. An overview of the tests is provided in Table 1 below.

Table 1 Model Acceptance Tests

Test No	Test Name
1	Flat Run
2	Steady-State Reactive Power Limit
3	Dynamic Reactive Power Limit
4	Voltage Reference Step Change
5	Active Power Reference Step Change
6	Grid Frequency Magnitude Change
7	Balanced Fault Ride-Through
8	Balanced Remote Fault Ride-Through
9	Unbalanced Fault Ride-Through

¹ SCR is a measure of the strength of the network to which the equipment is connected (or to be connected). Further details can be found in Annex C of IEEE Std. 2800-2022.

10	Voltage Protection Verification
11	NERC PRC-024 Voltage Ride-Through
12	Frequency Ride-Through
13	Rate of Change of Frequency (ROCOF) Ride-Through
14	Grid Voltage Phase Angle Change Ride-Through
15	Point of Interconnection SCR Change Ride-Through
16	Power Factor Verification Test
17	Consecutive Voltage Deviation Ride-through
18	Voltage Oscillation Ride-through

1.1.1.1 Battery Energy Storage System (BESS)

For battery energy storage system (BESS), all model acceptance tests must be performed in both discharging and charging mode.

1.1.1.2 Hybrid IBR Plant

Should a plant incorporate multiple IBR technologies, such as a combination of photovoltaic (PV) and BESS, model assessment tests must be applied to each technology type individually per its designated operational strategy. For instance, in a PV-BESS facility, should the BESS be designed to inject or absorb power from the transmission network, irrespective of the PV's operational status, the testing should encompass the stand-alone operation of the PV and BESS and their concurrent functioning.

1.1.1.3 SCR for Model Acceptance Tests

The model acceptance tests shown in Table 1 shall be conducted for the three SCRs listed below:

1. SCR = 2.5 and $X/R = 10$
2. SCR = 20 and $X/R = 10$
3. SCR = Infinite ²

The SCR and X/R shown above and IBR's rated aggregate MVA value shall determine the required grid impedance between the IBR plant's Point of Interconnection (POI) and the infinite bus representing the transmission grid. For a HVDC connected IBR plant, the MVA capability of the HVDC transmission facility shall be used.

For a hybrid IBR plant, the grid impedance calculated for model acceptance tests is guided by the plant's designated operational strategy. If each technology type (e.g., PV, BESS) in the plant is

² For any test that uses an infinite SCR, if reactive drift is observed during testing, this can be changed to a finite value that is still sufficiently high to where the generator will not influence the dynamics of the POI.

intended to operate in stand-alone mode only, the grid impedance will be determined using the aggregate rating of the specific IBR resource being evaluated. If not, the total aggregated rating of all IBR resources will be used.

1.1.4 Reference Point of Applicability for Dynamic Performance and Benchmarking Requirements

The reference point of applicability for the dynamic performance and benchmarking requirements is the Point of Measurement (POM)³. The applicable requirements are provided along with each model acceptance test.

1.1.5 Simulation Tools

The model acceptance tests shall be conducted using PSSE for positive sequence modeling and PSCAD for EMT modeling. The software version used shall be the ISO-NE version in effect.⁴

1.1.6 Benchmarking Report

A benchmarking report must be submitted to document the analysis results, as specified in section 5.

1.1.7 Results Evaluation

ISO-NE will use good engineering judgment and the requirements outlined herein to evaluate submitted model dynamic performance and benchmarking results for acceptability.

1.1.8 Interconnection Stage Applicability

The model acceptance tests in this Appendix correspond to, and leverage, the design-evaluation activities described in IEEE 2800.2-2026 Section 7.3, conducted in support of a Cluster Study.

³ Definitions adopted as used in IEEE Std. 2800-2022, and per PP5-6 Appendix F

⁴ The list of software and software versions used by ISO for interconnection studies is posted on its website at <https://askiso.iso-ne.com/s/article/Modeling-Data-Software-Compatibility>

Section 2

Test System

The model acceptance tests in Table 1 shall be conducted using an SMIB test system.

2.1 Single Machine Infinite Bus

A SMIB test system generally consists of an equivalent IBR plant connected to a bus representing the transmission grid (i.e., infinite bus). The transmission line between the IBR POI and the infinite bus represents the grid impedance. The following figure provides a representation of the appropriate equivalent to be used.

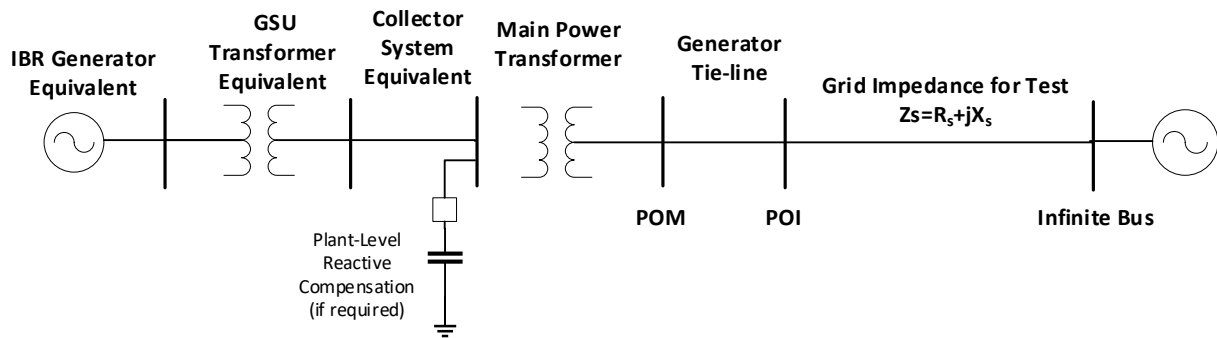


Figure 1 Single Machine Infinite Bus Test System

2.1.1 Equivalent IBR generator representation in PSSE and PSCAD

The equivalent IBR generator represents all the inverters' total generating capacity.

2.1.2 Equivalent Generator Step-up Transformer in PSSE and PSCAD

The equivalent generator step-up transformer represents the aggregate effect of all step-up transformers.

2.1.3 Equivalent Collector System in PSSE and PSCAD

The equivalent collector system branch represents the aggregate effect of the IBR plant collector system.

2.1.4 Main Power Transformer (MPT)⁵

Where applicable, the main power transformer shall be modeled as two-winding.

2.1.5 Voltage Control

2.1.5.1 Equivalent IBR generator

By default, the equivalent IBR generator shall be in voltage control mode. For the MAT's purposes, the voltage control target shall be set to regulate the POI according to the voltage schedule defined

⁵ The MPT is the power transformer that steps up voltage from the collection system voltage to the nominal transmission/interconnecting system voltage for dispersed power producing resources.

in Table 2. If an auxiliary device (e.g., STATCOM) is used to regulate the POI voltage, adequate technical rationale must be provided on the proposed coordination between the IBR and the auxiliary device.

Table 2 Voltage Schedule Assumption

Voltage Schedule Assumption for MAT	
Nominal Voltage (kV) at POI	Voltage Schedule (kV) at POI
345	355
230	234
115	118

2.1.5.2 GSU, MPT, and reactive compensation device

GSU, MPT taps, and any reactive compensation device within the plant should be configured such that the plant's reactive power capability is utilized to its fullest extent; this utilization of the plant's reactive power capability shall be evaluated at the maximum net active power injection and absorption at the POI⁶. In addition, this configuration should respect the inverter terminal's continuous operating voltage range. Transformer taps and switched shunt settings should not be adjusted between tests.

- If an On-Load Tap Changer (OLTC) transformer is used, the tap should adjust based on the load flow solution; it should not be set manually to a specific tap.

2.1.6 Infinite Bus Setup

The infinite bus, as shown in Figure 1, is connected to the IBR plant POI bus through a transmission line; the impedance of this transmission line is determined using the information provided in Section 1.1.3 and represents the grid impedance for model acceptance tests. The infinite bus must be numbered 101.

2.1.6.1 Infinite bus source load flow representation in PSSE

The source connected to the infinite bus is modeled as a generator with a machine base of 10,000 MVA with an impedance of $R = 0$ and $X = 0.01$ per unit. The infinite bus generator voltage set point is set to a default value of 1.0 p.u., and may be adjusted to achieve the required reactive power at the POI for the model acceptance tests.

2.1.6.2 Infinite bus source PSSE dynamic model

The infinite bus generator in PSSE will use two different dynamic models depending on the model acceptance test being simulated. The specific model to be used is provided with the test details.

1. GENCLS with parameters $H=D=0$

⁶ Refer to Appendix D of ISO-NE Planning Procedure for additional guidance.

2. PLBVF1 to play-in voltage and/or frequency signal

2.1.6.3 Infinite bus source representation in PSCAD

An equivalent generator model shall be used in PSCAD to represent the infinite bus.

2.2 Grid Impedance Calculation

The grid impedance to be used for model acceptance testing can be calculated using the method below.

Grid impedance as per Figure 1 is $Z_S = R_S + jX_S$ where Z_S is in per unit. The following steps can be used to determine R_S and X_S :

Step 1. Determine base impedance Z_B

$$i. \quad Z_B = \frac{V_B^2}{MVA_B}$$

where

V_B is the nominal line-line POI voltage in kV

MVA_B is the system base MVA. MVA_B is assumed to be 100 MVA for calculation.

Step 2. Determine X_Ω using formula below

$$X_\Omega = \frac{V_B^2}{\frac{SCR \times IBR_{MVA}}{\sqrt{1 + \frac{1}{\left(\frac{X}{R}\right)^2}}}}$$

where,

V_B is the nominal line-line POI voltage in kV

SCR is the SCR required for the specific model acceptance test

X/R is the value required for the specific model acceptance test

IBR_{MVA} is the aggregate MVA of the IBR (MVA capability of HVDC, where applicable)

Step 3. Determine R_Ω

Given:

$$\frac{X}{R} = k$$

where k is the $\frac{X}{R}$ ratio

$$R_\Omega = \frac{X_\Omega}{k}$$

Step 4. Using Z_B , X_Ω , and R_Ω calculated above

$$X_S = \frac{X_\Omega}{Z_B}$$

$$R_S = \frac{R_\Omega}{Z_B}$$

Section 3 PSSE and PSCAD Simulation Setup

This section provides details on the dynamic simulation setup required for the model acceptance tests outlined in Table 1 of Section 1.1.

3.1 Solution Parameters

3.1.1 PSSE Dynamic Simulation Parameters

The default dynamic simulation solution parameters are shown below.

Settings	Values
Network solution iterations	100
Acceleration	0.5
Tolerance	0.0001
Island frequency acceleration	1.0
Island frequency tolerance	0.0005
Time step	4.16 ms
Frequency filter	0.033
Delta threshold intermediate	0.05
Delta threshold island frequency	0.116667

The number of iterations and acceleration may be adjusted as needed, within reasonable values, to aid in network convergence. The same solution parameters must be utilized for all the simulations and documented in the benchmark report.

3.1.2 PSSE and PSCAD Simulation Run Time

Unless stated otherwise, all tests shall be run for at least 30 seconds from disturbance inception and show that the response has reached steady-state.

3.1.3 PSCAD Simulation Parameters

The simulation parameters, as provided by the OEM of the IBR inverter model, should be adhered to.

3.2 PSSE and PSCAD Simulation Plot

The simulation output signals to be plotted for all the model acceptance tests are shown in Table 3.

Table 3 PSSE and PSCAD Simulation Plots

Simulation Output Quantity	Measurement Point	Measurement Quantity
Active Power	IBR Terminal and POM	The simulation tool calculated Root Mean Square (RMS) quantity.
Reactive Power		
Voltage Magnitude		
Grid frequency (computed by Power Plant Controller (PPC), Phase-Locked Loop (PLL) output, etc.)	POM	
Instantaneous Phase Voltage	IBR Terminal	Instantaneous measured quantity in PSCAD.
Instantaneous Phase Current		

3.2.1 Plot Time Step

3.2.1.1 PSCAD

The plot time step must not exceed 500 μ s (microsecond). A plotting filter time constant of 0.02 seconds must be used.

3.2.1.2 PSSE

The plot time step must adequately capture the transient behavior due to the applied disturbance.

3.2.2 Plot Scale

Plot scales shall be set appropriately for the reviewers to discern the entirety of the plotted signals without clipping.

3.2.3 Benchmarking Analysis Plots

A trace-over-trace comparison plot of the simulation output quantity must be provided for the model acceptance tests that require benchmarking analyses.

3.3 Sample Plots

The sample plots provided in this section illustrate the expected format of plots included in the benchmarking report.

3.3.1 Voltage Reference Step Test

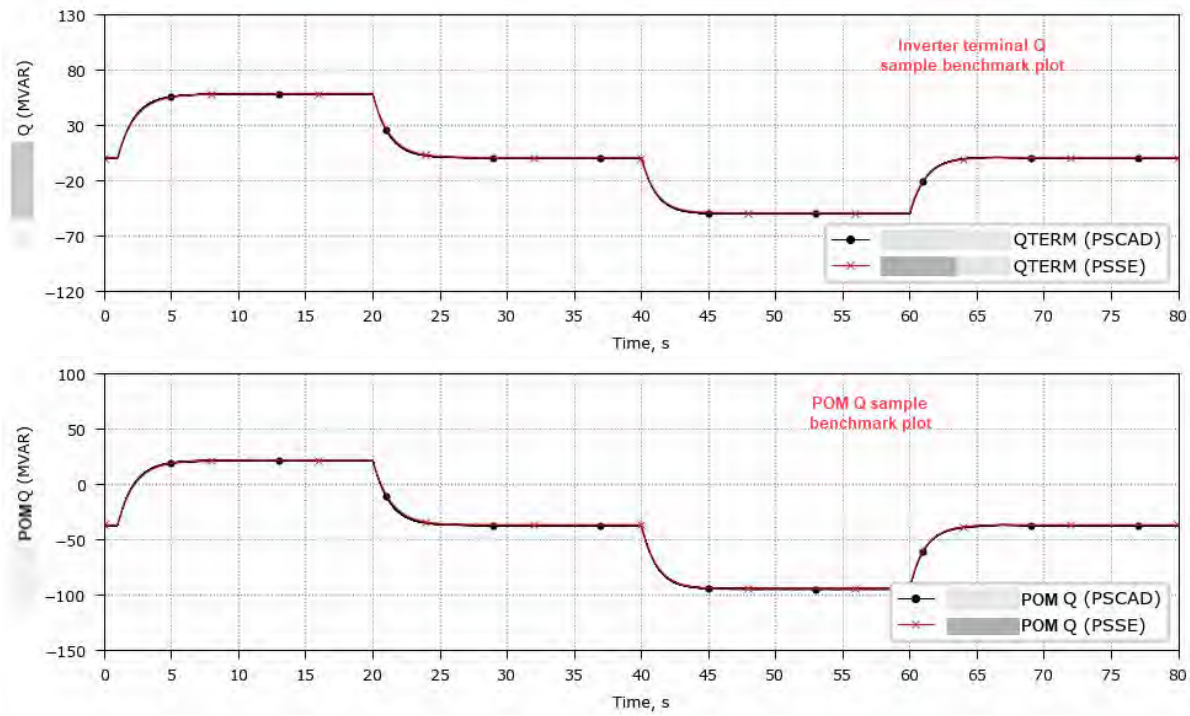
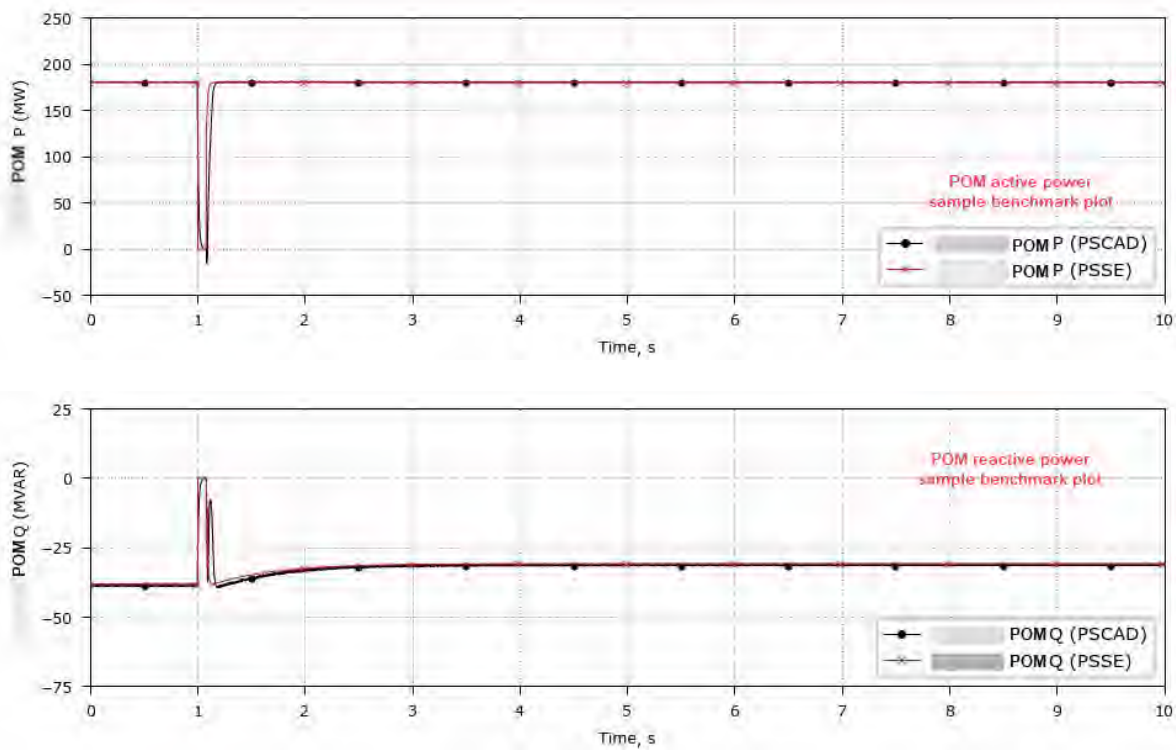


Figure 2 Voltage Reference Step Test

3.3.2 3-phase bolted fault



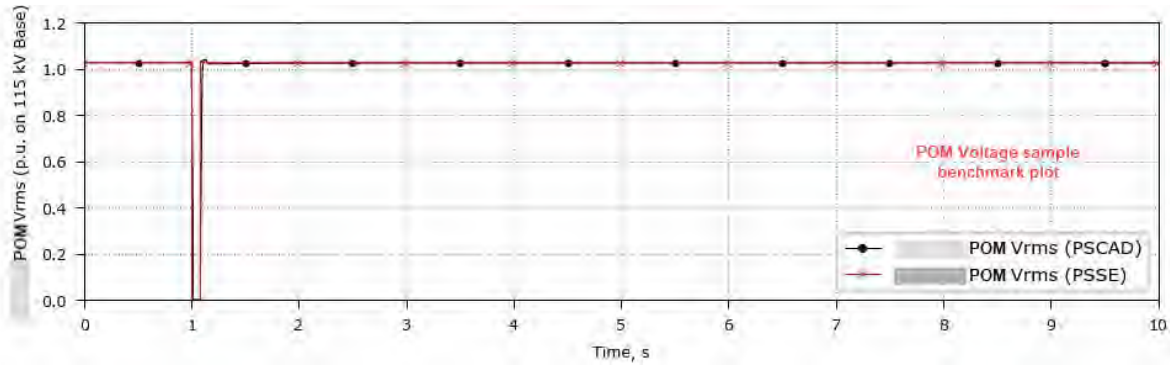


Figure 3 3-phase bolted fault – POM

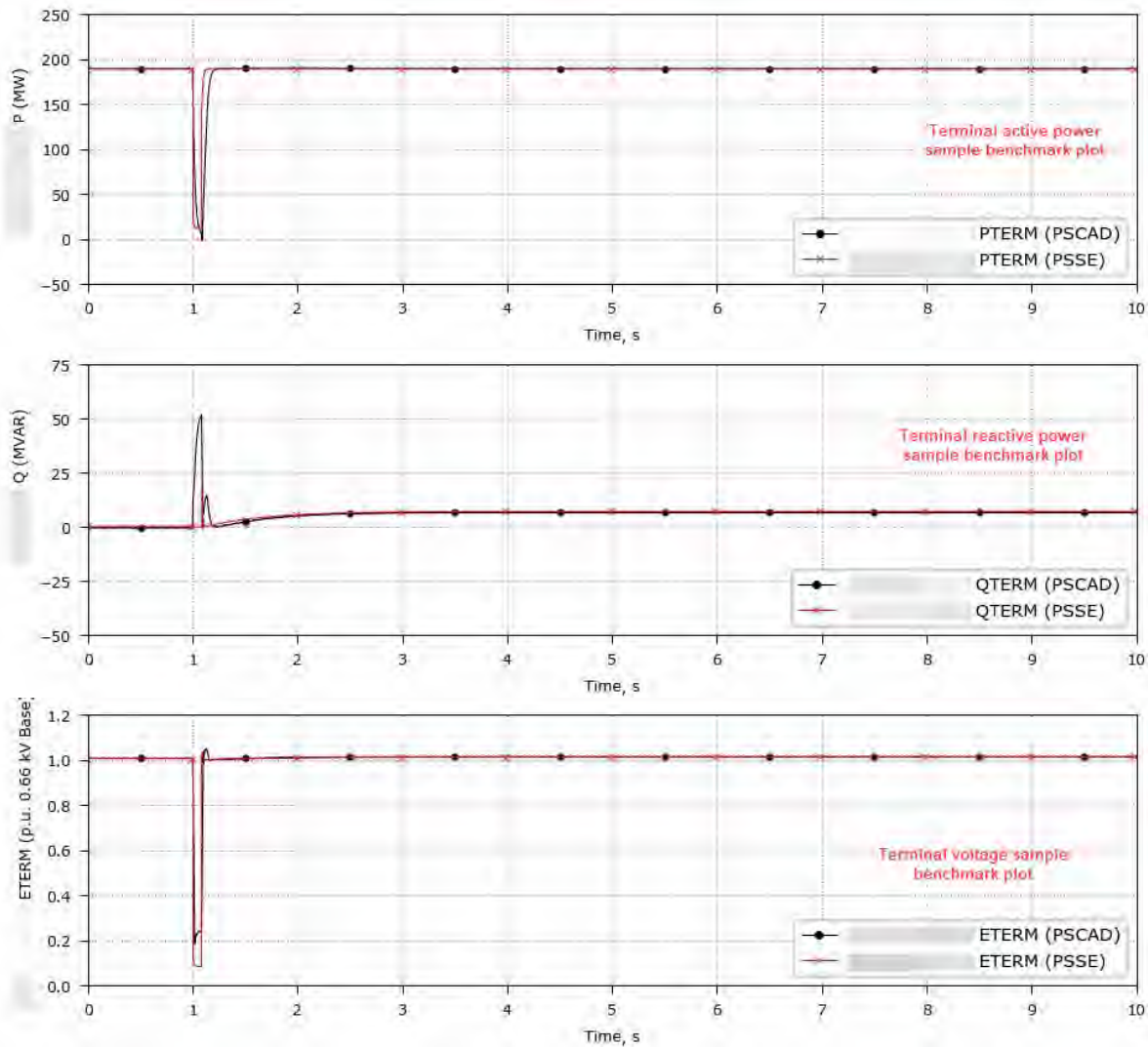


Figure 4 3-phase bolted fault - IBR Terminal

3.3.3 Instantaneous Phase Voltage and Current

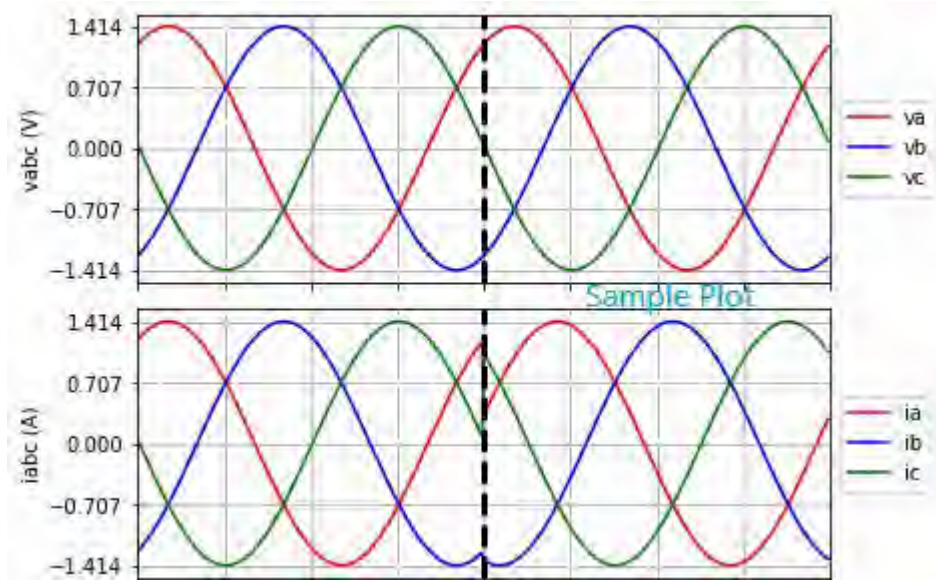


Figure 5 Instantaneous Phase Voltage and Current – IBR Terminal

Section 4 Model Acceptance Tests

The model acceptance tests specified in Table 1 of Section 1.1 are required to evaluate the provided models' consistency, accuracy, and dynamic performance. This section provides detailed guidance on simulating these tests and the dynamic performance and benchmarking requirements associated with each test.

The term Pnet used for all the tests refers to the net active power injection at the POI stated in the Interconnection Request. In model acceptance tests involving a BESS, Pnet refers to net injection (i.e., discharging) and absorption (i.e., charging) at the POI.

4.1 Test 1 – Flat Run

This test evaluates the model's ability to initialize accurately for given inputs and reach a steady-state output.

4.1.1 Test Description

The plant is initialized at the initial active and reactive power at POI values shown in Table 4. The GENCLS model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 4 Flat Run Test

Test No	Simulation Time (s)	SCR	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
1a	30	Infinite ⁷	Pnet	~0	PSSE and PSCAD	Dynamic Performance PSCAD model: The output reaches steady-state within 5 seconds PSSE model: Generator MW and MVAR will not change by 0.1 or more. Line Flow MW and MVAR will not change by 0.3 or more.
1b	30	Infinite	0.5 * Pnet ⁸	~0	PSSE and PSCAD	

⁷ Represented by a zero impedance line.

⁸ If the plant requires a minimum physical output, then test at the minimum value. Documentation must be provided to support the physical minimum value.

						Bus voltage will not change by 0.0001pu or more. Angle will not change by .1 or more The model shall not cause any DSTATE error.Benchmarking Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.
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4.2 Test 2 - Steady-State Reactive Power Limit

This test evaluates the model's ability to initialize at its steady-state capacitive and inductive reactive power limits, demonstrating the IEEE 2800 clause 5.1 Reactive power capability envelope at the POM

4.2.1 Test Description

The plant is initialized at its capacitive and inductive limits (Qmax and Qmin). The grid voltage can be adjusted such that the inverter (or HVDC, where applicable) can inject or absorb maximum (Qmax)/minimum (Qmin) reactive power at the terminals. The GENCLS model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 5 Steady-State Reactive Power Limit Test

Test No	Minimum Simulation Time (s)	SCR	Initial Active Power at POI (MW)	Initial Reactive Power at Inverter Terminal (MVAR)	Simulation Tool	Acceptance Criteria
2a	30	Infinite ⁷	Pnet	Qmax	PSSE and PSCAD	Dynamic Performance The plant shall initialize at and maintain its stated steady-state capacitive and inductive limit for the duration of the simulation.
2b	30	Infinite	Pnet	Qmin	PSSE and PSCAD	

2c	30	Infinite	0 ⁹	Qmax	PSSE and PSCAD	PSSE model: Generator MW and MVAR will not change by 0.1 or more. Line Flow MW and MVAR will not change by 0.3 or more.
2d	30	Infinite	0	Qmin	PSSE and PSCAD	Bus voltage will not change by 0.0001pu or more. Angle will not change by .1 or more The model shall not cause any DSTATE error. Benchmarking Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.

4.3 Test 3 – Dynamic Reactive Power Limit

This evaluates the IBR plant's ability to dynamically reach its capacitive and inductive limits in conformity with IEEE 2800 clause 5.1 reactive power capability.

4.3.1 Test Description

A step increase and a step decrease in the POI voltage are applied such that the plant reaches inductive and capacitive limits, respectively. The step size applied should be such that the IBR does not transition to fault ride-through (FRT) mode. The simulation time should be sufficiently long that a steady-state condition is achieved before performing the next step event if multiple steps are performed in a single simulation. The PLBVF1 model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

NOTE: Transformer taps or capacitors shall remain locked for this test.

⁹ The real power output at the terminal is zero MW unless there is a physical minimum required output. Documentation must be provided to support the physical minimum value.

Table 6 Dynamic Reactive Power Limit Test

Test No	Minimum Simulation Time (s)	SCR	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
3	30	Infinite	Pnet	~0	PSSE and PSCAD	Dynamic Performance For the step increase and decrease in the grid voltage, respectively, the plant shall reach its inductive and capacitive MVAR limit. Benchmarking Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.

4.4 Test 4 - Voltage Reference Step Change

This test evaluates the IBR plant's dynamic performance to a step change in the plant controller's¹⁰ voltage reference in conformity with IEEE 2800 clause 5.2.

4.4.1 Test Description

A positive and a negative step change between 1% and 3% is applied such that the inverter and PPC¹¹ do not reach a reactive power or voltage limit. If the plant operates with a voltage droop, the droop value (percentage) is assumed larger than the applied voltage reference change; otherwise, a smaller step change may need to be used. The GENCLS model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

¹⁰ The device regulating the active or reactive power at the POI, which can be the PPC, a supplementary dynamic reactive device, or a HVDC converter.

¹¹ A PPC regulates and controls the networked inverters, devices, and equipment at an IBR plant to meet specified set points and change grid parameters at the POI.

Table 7 Voltage Reference Step Change Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
4a	30	SCR=2.5, X/R=10	Pnet	~0	PSSE and PSCAD	Dynamic Performance The dynamic performance required in response to a change in voltage control reference is provided in Table 8. Any deviation from the performance target must be accompanied by adequate technical rationale. Benchmarking Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.
4b	30	SCR=20, X/R=10	Pnet	~0	PSSE and PSCAD	

Table 8 Reactive Power- Voltage Performance¹² for Voltage Reference Step

Parameter ³	Performance Target	Notes
Reaction Time	< 200 ms	
Maximum step response time	< 10 seconds	The response time can be adjusted to allow for a stable and damped response. That is, if it is shown that for the applicable IBR plant and the given grid to which the IBR plant is connected, a stable response requires a response time that marginally exceeds the recommended response time, then this is preferred to provide a stable and damped response.
Damping	Damping Ratio of 0.3 or higher	

4.5 Test 5 - Active Power Reference Step Change

This test evaluates the IBR plant's dynamic performance to a step change in the plant controller's active power reference in conformity with IEEE 2800 Clause 6 active power dynamic performance requirements.

4.5.1 Test Description

A positive and a negative step change is simulated in the PPC's active power reference. The reference step size should be approximately 10% of the plant's net output; it should be such as to prevent the inverter from reaching a real power limit or transitioning into a charging mode of operation in the case of a BESS. The GENCLS model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

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Table 9 Active Power Reference Step Change Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
5a	30	SCR=2.5, X/R=10	~0.5 *Pnet	~0	PSSE and PSCAD	Dynamic Performance The dynamic performance required in response to a change in active power control reference is provided in Table 10. Any deviation from the default value must be within the range of available values of Table 10 and must be accompanied by adequate technical rationale. Benchmarking Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.
5b	30	SCR=20, X/R=10	~0.5 *Pnet	~0	PSSE and PSCAD	

Table 10 Active Power-Frequency Dynamic Performance¹²

Parameter ³	Units	Default Value	Range of available values	
			Minimum	Maximum
Reaction Time	Seconds	0.5	0.2 (0.5 for WTG)	1
Rise Time	Seconds	4.0	2.0 (4.0 for WTG)	20
Settling Time	Seconds	10.0	10	30
Damping Ratio	Unitless	0.3 or higher	0.2	1.0
Settling Band	% of change	Max (2.5 % of change or 0.5 % of ICR ¹⁴)	1	5
Note 1 – The reaction time starts when the fundamental-frequency component of the voltage measured at the POM has deviated outside of the applicable deadband¹⁵. Note 2 - The response time can be adjusted to allow for a stable and damped response. That is, if it is shown that for the applicable IBR plant and the given grid to which the IBR plant is connected, stable response requires a rise time or settling time that is marginally closer to the upper limit defined in Table 10, then this is preferred to provide stable and damped response.				

4.6 Test 6 - Grid Frequency Magnitude Change

This test evaluates the IBR plant's dynamic performance to a step change in the grid frequency magnitude in conformity with IEEE 2800 clause 6.1 primary frequency response requirements

¹⁴ ICR is defined as the Rated Active Power Output (or Rated Active Power Absorption, where applicable) at the POI.

¹⁵ https://www.iso-ne.com/static-assets/documents/rules_proceeds/operating/isone/op14/op14_rto_final.pdf

4.6.1 Test Description

A grid frequency magnitude step change of + 0.5 Hz and -0.5 Hz, relative to nominal grid frequency magnitude, is applied. The step size applied should be such as to prevent the inverter from reaching a real power limit or transitioning into a charging mode of operation in the case of a BESS. The PLBVF1 model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 11 Grid Frequency Magnitude Change Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
6a	30	SCR= 2.5, X/R=10	0.5 *Pnet	~0	PSSE and PSCAD	Dynamic Performance The dynamic performance required in response to a change in the grid frequency is provided in Table 10. Any deviation from the default value must be within the range of available values of Table 10 and must be accompanied by adequate technical rationale. Benchmarking Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.
6b	30	SCR=20, X/R=10	0.5 *Pnet	~0	PSSE and PSCAD	

4.7 Test 7 – Balanced Fault Ride-Through Performance

This test evaluates the IBR plant's ability to ride-through a 3-phase bolted fault applied at the POI followed by an unsuccessful reclosing event in conformity with IEEE 2800 clause 7.2.2

For a HVDC connected IBR plant, an additional test evaluates the IBR's impact on the HVDC for a 3-phase bolted fault applied at the IBR collector system bus.

4.7.1 Test Description

A 3-phase bolted fault is applied at the POI and is cleared in 6 cycles without tripping any transmission element. A second 3-phase bolted fault is applied 5 seconds post first fault clearing and is cleared in 6 cycles without tripping any transmission element.

For a HVDC connected IBR plant, a 3-phase bolted fault is applied at the IBR collector system and cleared in 5 cycles. This fault is not simulated at the same time as the POI fault. The GENCLS model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 12 Balanced Fault Ride-Through with Reclosing Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
7a	30	SCR=2.5, X/R=10	Pnet	~0	PSSE and PSCAD	Dynamic Performance 1. The IBR plant does not trip. If the IBR plant enters current blocking mode when the retained voltage at the POM is less than 10%, the IBR plant starts injecting current in 5 cycles or less once the applicable voltage at POM enters the continuous or mandatory operation region. 2. In fault ride-through (FRT) mode, the inverter injects current in accordance with clause 7.2.2.3.4 of IEEE 2800-2022, provides necessary reactive current support to help maintain system voltage and reactive power priority is maintained. 3. After the fault is cleared, the IBR restores pre-disturbance active power injection in accordance with clause 7.2.2.6 of IEEE 2800-2022 while remaining stable and damped (damping ratio > or = to 0.3 4. IBR reactive current response shall not exacerbate transient overvoltage conditions on the transmission system.
7b	30	SCR=20, X/R=10	Pnet	~0	PSSE and PSCAD	
7c	30	SCR=2.5, X/R=10	0.5*Pnet	~0	PSSE and PSCAD	
7d	30	SCR=20, X/R=10	0.5*Pnet	~0	PSSE and PSCAD	

						Benchmark Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.
Additional Test for HVDC connected IBR plant						
7e	30	SCR=20, X/R=10	Pnet	~0	PSSE and PSCAD	Dynamic Performance The IBR plant is expected to ride-through. Benchmark Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power measured at the IBR collector bus.

4.8 Test 8 – Balanced Remote Fault Ride-Through

This test evaluates the IBR plant's ability to ride-through due to a balanced fault remote from the POI in conformity with IEEE 2800 clause 7.2.2

4.8.1 Test Description

A 3-phase fault is applied with a fault impedance at the POI such that the POI voltage reaches approximately 66%. The fault is cleared in 6 cycles without tripping any transmission elements. The GENCLS model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 13 Balanced Remote Fault Ride-Through Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria

8a	30	SCR=2.5, X/R=10	Pnet	~0	PSSE and PSCAD	Dynamic Performance 1. The IBR plant does not trip. If the IBR plant enters current blocking mode when the retained voltage at the POM is less than 10%, the IBR plant starts injecting current in 5 cycles or less once the applicable voltage at POM enters the continuous or mandatory operation region. 2. In fault ride-through (FRT) mode, the inverter injects current in accordance with clause 7.2.2.3.4 of IEEE 2800-2022, provides necessary reactive current support to help maintain system voltage and reactive power priority is maintained. 3. After the fault is cleared, the IBR restores pre-disturbance active power and reactive power injection in accordance with clause 7.2.2.6 of IEEE 2800-2022 while remaining stable and damped (damping ratio > or = to 0.3 4. IBR reactive current response shall not exacerbate transient overvoltage conditions on the transmission system. Benchmark Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.
8b	30	SCR=20, X/R=10	Pnet	~0	PSSE and PSCAD	

4.9 Test 9 – Unbalanced Fault Ride-Through

This test evaluates the IBR plant’s ability to ride-through an unbalanced fault applied at the POI in conformity with IEEE 2800 clause 7.2.2

4.9.1 Test Description

A single line-to-ground, double line-to-ground, and line-to-line (1LG, 2LG, LL) fault is applied at the POI and cleared in 15 cycles without tripping any transmission elements.

Table 14 Unbalanced Fault Ride-Through Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
9a	30	SCR=2.5, X/R=10	Pnet	~0	PSCAD	Dynamic Performance 1. The IBR plant does not trip. If the IBR plant enters current blocking mode when the retained voltage at the POM is less than 10%, the IBR plant starts injecting current in 5 cycles or less once the applicable voltage at POM enters the continuous or mandatory operation region. 2. In fault ride-through (FRT) mode, the inverter injects current in accordance with clause 7.2.2.3.4 of IEEE 2800-2022, provides necessary reactive current support to help maintain system voltage and reactive power priority is maintained. 3. After the fault is cleared, the IBR restores pre-disturbance active power injection in accordance with clause 7.2.2.6 of IEEE 2800-2022 while remaining stable and damped (damping ratio > or = to 0.3 4. IBR reactive current response shall not exacerbate transient overvoltage conditions on the transmission system.
9b	30	SCR=20, X/R=10	Pnet	~0	PSCAD	

						Benchmark Performance Not applicable.
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4.10 Test 10 – Voltage Protection Verification

This test aims to verify that respective high and low voltage protection exists and operates as intended.

4.10.1 Test Description

A grid voltage step relative to the initial voltage is applied, as shown in Figure 6 and Figure 7. If needed, a larger grid voltage step can be applied to cause the inverters to trip. The PLBVF1 model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 15 Voltage Protection Verification Test

Test No	Minimum Simulation Time (s)	SCR	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
10	30	Infinite	Pnet	~0	PSSE and PSCAD	Dynamic Performance The inverter trips due to the applied voltage. Benchmark Performance Not applicable.

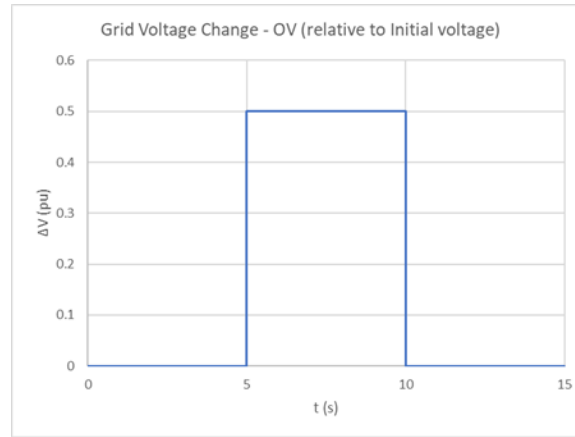


Figure 6 Voltage Protection Test - Grid Overvoltage

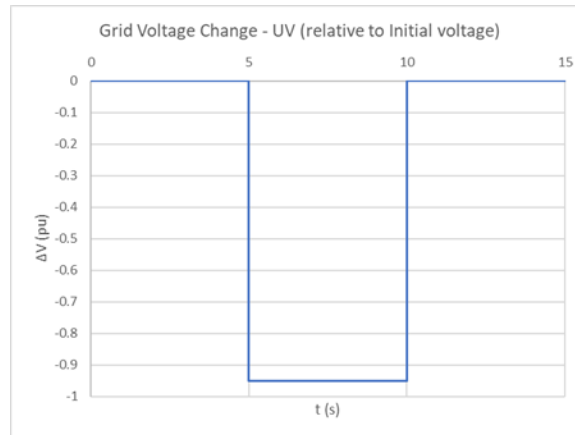


Figure 7 Voltage Protection Test - Grid Undervoltage

4.11 Test 11 –Voltage Ride-Through

This test evaluates the IBR plant’s ability to meet the IEEE 2800 clause 7.2.2 Table 12 ¹⁶ Voltage Ride-through requirement.¹⁷¹⁸

4.11.1 Test Description

The IEEE 2800 voltage ride-through curve is simulated at the IBR POM. The entire curve should be played back at one time and not each section individually. The PLBVF1 model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 16 Voltage Ride-Through Test

Test No	Minimum Simulation Time (s)	SCR	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
11	30	Infinite	Pnet	~0	PSSE and PSCAD	Dynamic Performance The plant successfully rides through with a stable and damped response. Benchmark Performance Not applicable.

4.12 Test 12 – Frequency Ride-Through

This test evaluates the IBR plant’s ability to meet the IEEE 2800 clause 7.3.2 Frequency Ride-through and PRC-006-NPCC¹⁹ low frequency ride-through requirement¹⁷. The low and high frequency thresholds to be evaluated are shown in Table 18.

¹⁶ If applicable PRC-029 requirements exceed IEEE 2800 clause 7.2.2, then PRC-029 will be used.

¹⁸ If auxiliary devices restrict ride through capabilities, table 11 values may be used for those specific points that fail.

¹⁹ As stated in Requirement 10 (<https://www.nerc.com/pa/Stand/Reliability%20Standards/PRC-006-NPCC-2.pdf>)

4.12.1 Test Description

The low frequency and high frequency ride-through threshold to be evaluated are simulated at the IBR POI. The test can be simulated as individual tests for each frequency threshold to be evaluated; it can also be simulated as two separate composite tests – one for low frequency and one for high frequency. If tested as a composite, sufficient time should be provided between frequency transitions to allow the IBR to settle at a steady-state output. The PLBVF1 model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 17 Frequency Ride-Through Test

Test No	Minimum Simulation Time (s)	SCR	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
12	30	Infinite	0.5 *Pnet	~0	PSSE and PSCAD	Dynamic Performance The plant successfully rides through with a stable and damped response. Benchmark Performance Not applicable.

Table 18 Low and High Frequency Test Threshold

Frequency	Minimum Ride Through Time (s) ¹⁷¹⁹
Low Frequency (Hz)	
57	As required in IEEE 2800 Table 15

High Frequency	
61.8	As required by IEEE 2800 Table 15

4.13 Test 13 - Rate of Change of Frequency (ROCOF) Ride-Through

This test evaluates the plant's ability to ride-through frequency excursions with a rate of change of frequency (ROCOF) magnitude equal to 5.0 Hz/s in conformity with IEEE 2800 7.3.2.3.5.

4.13.1 Test Description

A ROCOF event is simulated by ramping the grid frequency at a rate of 5.0 Hz/s from 60 Hz to 59 Hz. This test should be simulated in PSCAD only.

Table 19 Rate of Change of Frequency Ride-Through Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
13a	30	SCR=2.5, X/R=10	0.5 *Pnet	~0	PSCAD	Dynamic Performance The plant successfully rides through with a stable and damped response.
13b	30	SCR=20, X/R=10	0.5 *Pnet	~0	PSCAD	
						Benchmark Performance Not applicable.

4.14 Test 14 - Grid Voltage Phase Angle Change Ride-Through

This test evaluates the plant's ability to ride-through a balanced system voltage phase angle change of +/- 25° in conformity with IEEE 2800 clause 7.3.2.4.

4.14.1 Test Description

A balanced system voltage phase angle jump is simulated as per Table 21. This test should be simulated in PSCAD only.

Table 20 Grid Voltage Phase Angle Change Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
14a	30	SCR=2.5, X/R=10	Pnet	~0	PSCAD	Dynamic Performance - The plant successfully rides through with a stable and damped response. - Current blocking is not allowed in the post-disturbance period. Benchmark Performance Not applicable.
14b	30	SCR=20, X/R=10	Pnet	~0	PSCAD	

Table 21 Grid Voltage Phase Angle Change

Test Sequence	Phase A	Phase B	Phase C
Balanced system phase angle change			
Base	0°	-120°	120°

Base + 25°	+25°	-95°	145°
Base - 25°	-25°	-145°	95°

4.15 Test 15 - Point of Interconnection SCR Transition Ride-Through

This test evaluates the IBR plant's ability to ride-through successive changes in SCR at the POI.

4.15.1 Test Description

The SCR at the POI is changed as per Figure 8. A 3-phase grounded fault is applied at each SCR transition. The time between each transition may be adjusted to allow the plant to stabilize. Prior to each transition, the reactive power at the POI should be adjusted such that the IBR is not at its capacitive or inductive limit. The GENCLS model should be used in PSSE for the infinite bus dynamic model, and an equivalent model should be used in PSCAD.

Table 22 POI SCR Transition Test

Test No	Minimum Simulation Time (s)	SCR and X/R	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
15	30 ²⁰	As per Figure 8, X/R= 10	Pnet	~0	PSSE and PSCAD	Dynamic Performance The plant successfully rides through the minimum SCR capability²¹ as stated by inverter OEM. The response is expected to be stable and damped at up to SCR of 2. Benchmark Performance Not applicable.

²⁰ The simulation time can be extended to allow for testing all SCR transitions.

²¹ At the POI or as interpreted at the inverter terminal.

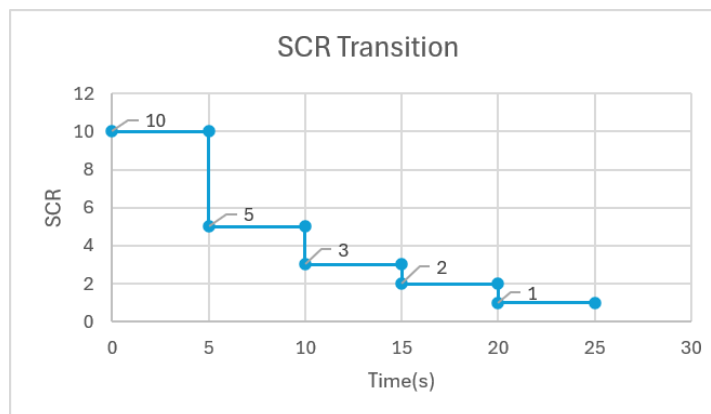


Figure 8 POI SCR Transition

4.16 Test 16 – Power Factor Verification

This tests verifies conformance with IEEE 2800 clause 5.1 minimum reactive power capability requirements

4.16.1 Test Description

The IBR plant is initialized at the specified active power level and commanded to deliver the specified reactive power at the POM. The voltage at the POM is set to the applicable corner-point voltage within .0001pu by adjusting the infinite bus voltage source and the IBR plant voltage reference. The plant must achieve and maintain the commanded operating point for the duration of the simulation without exceeding inverter terminal continuous operating voltage limits, without entering fault ride-through mode, and without protection trip or controller saturation.

NOTE: Any taps or capacitor switching used to help meet dynamic requirements shall remain locked for this test.

Table 23 Power Factor Verification Test

Test No	Minimum Simulation Time (s)	SCR	POM Voltage (p.u.)	Initial Active	Minimum Initial Reactive	Simulation Tool	Acceptance Criteria

			(within 0.001 p.u. of)	Power at POI (MW)	Power at RPA (MVAR)		
16a ²²²³	30	SCR=20 X/R=10	0.90	Pnet	$0.3287 \times \text{Pnet}$ injecting	PSSE and PSCAD	Dynamic Performance The plant shall initialize at and maintain the minimum capacity of inductive reactive power at the POM for the duration of the simulation. No protection trips, reduction in output, LVRT/HVRT Mode entry, PPC saturation, or any other change in electrical parameters is permitted. PSSE model: Generator MW and MVAR will not change by 0.1 or more. Line Flow MW and MVAR will not change by 0.3 or more. Bus voltage will not change by 0.0001pu or more. Angle will not change by .1 or more The model shall not cause any DSTATE error.
16b	30	SCR=20 X/R=10	0.95	Pnet	$0.3287 \times \text{Pnet}$ injecting	PSSE and PSCAD	
16c	30	SCR=20 X/R=10	POI <200kV: 0.99 ≥200kV: 1.00	Pnet	$0.3287 \times \text{Pnet}$ absorbing	PSSE and PSCAD	
16d	30	SCR=20 X/R=10	POI <200kV: 1.03 ≥200kV: 1.04	Pnet	$0.3287 \times \text{Pnet}$ injecting	PSSE and PSCAD	
16e	30	SCR=20 X/R=10	1.10	Pnet	$0.3287 \times \text{Pnet}$ absorbing	PSSE and PSCAD	
16f	30	SCR=20 X/R=10	POI <200kV: 0.99 ≥200kV: 1.00	0 MW ²⁴	$0.3287 \times \text{Pnet}$ absorbing	PSSE and PSCAD	Benchmarking Performance The dynamic performance between PSSE and PSCAD must align to the fullest extent possible, particularly for active and reactive power at the POM.

²² This test may not be applicable for IBR plants consisting of Type III WTGs (per IEEE P2800.2 Table 39 footnote a). For Type III WTG plants, the OEM-stated reduced capability curve below 0.95 p.u. shall be documented in lieu of the $0.7 \times \text{ICR}$ factor, and the corresponding reduced reactive power capability applies as the acceptance criterion. Reduced capability shall be supported by OEM type-test or equipment-level model evidence and noted in the benchmarking report.

²³ If tests fails at $0.3287 \times \text{Pnet}$, test will be re-run at $0.3287 \times 0.7 \times \text{Pnet}$ instead.

²⁴ The real power output at the terminal is zero MW unless there is a physical minimum required output. Documentation must be provided to support the physical minimum value.

4.17 Test 17 – Consecutive Voltage Deviation

This test aims to verify the IBR plants ability to ride through consecutive voltage deviations in conformity with IEEE 2800 clause 7.2.2.4

4.17.1 Test Description

A 3ph fault is first applied at the POI with impedance such that the voltage at the RPA is between 0 and .1 pu, after .32s, the fault is cleared. The simulation is then run for another 20 cycles, before applying another 3ph fault with impedance such that the RPA voltage is between .2 and .5PU, clear it after .88s

In a separate EMT simulation, the same test procedure is repeated using a 2ph fault instead.

Table 24 Consecutive Voltage Deviation

Test No	Minimum Simulation Time (s)	SCR	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
17a	30	SCR=2.5, X/R=10	Pnet	~0-+/- 10%	PSSE (3PH Only) and PSCAD (Both 3PH & 2PH)	Dynamic Performance 1. The IBR plant does not trip. If the IBR plant enters current blocking mode when the retained voltage at the POM is less than 10%, the IBR plant starts injecting current in 5 cycles or less once the applicable voltage at POM enters the continuous or mandatory operation region. 2. In fault ride-through (FRT) mode, the inverter injects current in accordance with clause 7.2.2.3.4 of IEEE 2800-2022, provides necessary reactive current support to help maintain system voltage and reactive power priority is maintained. 3. After the fault is cleared, the IBR restores pre-disturbance active power injection in accordance with
17b	30	SCR=20, X/R=10	Pnet	~0-+/- 10%	PSSE (3PH Only) and PSCAD (Both 3PH & 2PH)	

						clause 7.2.2.6 of IEEE 2800-2022 while remaining stable and damped (damping ratio $\geq$ 0.3 4. IBR reactive current response shall not exacerbate transient overvoltage conditions on the transmission system. Benchmark Performance Not applicable.
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4.18 Test 18 – Voltage Oscillation Ride through

This test aims to verify the IBR plants ability to ride through post-fault dynamic voltage oscillations in conformance with IEEE 2800 clause 7.2.2.4

4.18.1 Test Description

A damped voltage oscillation of .25hz, .5hz, 1hz, and 2hz are each individually applied in separate simulations. The envelope of the oscillation has an upper limit of 1.15 PU and a lower limit of .8PU and a damping of 3%

Table 25 Voltage Oscillation Ride Through

Test No	Minimum Simulation Time (s)	SCR	Initial Active Power at POI (MW)	Initial Reactive Power at POI (MVAR)	Simulation Tool	Acceptance Criteria
18	30	SCR=2.5, X/R=10	Pnet	~0	PSCAD	Dynamic Performance

						1. The IBR plant successfully rides through(no trip, no momentary cessation, no blocking outside permitted permissive operation regions). Benchmark Performance Not applicable.
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Section 5 Benchmarking Report

A benchmarking report must be submitted to document the analysis results. The report must include the following sections, at a minimum, and adhere to the order specified below.

5.1 Introduction

This section includes a brief description of the project, including Interconnection Request ID, proposed POI, and in-service date.

5.2 System Description

This section should include the following.

- a. A one-line diagram of the project up to the POI
- b. Component manufacturers (inverter, power-plant controller, auxiliary dynamic reactive device, etc.)
- c. As-modeled data, in PSSE and PSCAD, for the following in a tabular format including MVA base used for 'per unit' quantities
 - i. Individual and aggregated inverter ratings
 - ii. Inverter terminal continuous operating voltage range
 - iii. Individual and aggregated generator step-up (GSU) impedance and winding configuration
 - iv. Equivalent collector system impedance
 - v. Main power transformer (MPT) impedance and winding configuration
 - vi. Gen-tie impedance
 - vii. Static and dynamic reactive device

5.3 Modeling Methodology

This section should include the following.

- a. PSSE and PSCAD software versions used for the assessment (include minor release version number for e.g. PSSE 35.6.4²⁵ and PSCAD 5.1²⁵)
- b. PSSE and PSCAD model data revision used for the assessment
- c. PSSE and PSCAD simulation parameters which should include
 - i. Simulation time step
 - ii. Plotting time step

²⁵ Example only and may not be the version in use by ISO-NE.

- iii. Any other significant assumptions such as acceleration factor, tolerance
- d. Voltage droop, frequency droop, and applicable deadband
- e. GSU and MPT tap

5.4 Simulation Results

This section should include the following.

- a. Test order number as per Table 1 in Section 1
- b. Mode of operation if BESS (i.e., discharging or charging)
- c. Any specific assumptions for the test
- d. Technical rationale if requirements not met
- e. Trace-over-trace PSSE and PSCAD plots for simulation output quantities as per Table 5 and include the following. Sample plots are provided in Section 3.
 - i. One set of plot at the POM
 - ii. One set of plot at the inverter terminal

5.5 PSCAD model instructions

This section should include the following.

- a. Directions for compiling and initializing the model
- b. Instructions on directory path settings if applicable, including a list of libraries, object files, or other files that may be required to run the model.

5.6 Plant-specific settings and description of the control scheme

In this section, any control parameters specific to an individual plant must be stated. Where applicable, these parameters shall align with the PSSE dynamic model. These parameters shall include (among others):

- a. Ride-through activation and deactivation thresholds and parameters
- b. Voltage and frequency ride-through settings
- c. Active power ramp rates following faults
- d. Plant-level voltage controller gains and time constants
- e. Interface parameters with auxiliary devices such as STATCOMs, if applicable
- f. Description of the planned (or installed) control schemes (such as voltage, frequency, reactive power and/or power factor, runback, etc.). The description should include:
 - i. The target of the control scheme

- ii. Overview of how it achieves its intended result
- iii. Parameters that directly affect the performance, trigger levels, deadband, etc.
- iv. Limitations of the control scheme

Summary of ISO New England Board and Committee Meetings

October 2, 2026 Participants Committee Meeting

Since the last update, the Information Technology and Cyber Security Committee, Markets Committee, System Planning and Reliability Committee, Compensation and Human Resources Committee, and the Nominating and Governance Committee each met on September 16. The Board of Directors met on September 15 and 17. All of the meetings were held in Boston, Massachusetts.

The Information Technology and Cyber Security Committee convened with the full Board for the Committee's annual "deep dive" on cyber security issues and welcomed guest consultants who conducted a tabletop ransomware exercise. The exercise was designed to strengthen understanding of the Board's role during a significant cyber event, evaluate the effectiveness of governance processes, and identify decisions that could require Board attention. Following the session with the full Board, the Committee conducted its regular business and received an update on major information technology projects. The Committee reviewed the implementation of the nGEM real-time markets clearing engine, which is the first in the nation, and discussed the next phase of single interval market clearing engine improvements which will begin in 2027. The Committee was then updated on the upcoming completion of compliance with FERC Order No. 2222 related to distributed energy resources.

The Markets Committee conducted its annual review of the External Market Monitor's business continuity and succession plans. The Committee then received an update from the Internal Market Monitor regarding the market concentration outlook following recent and planned mergers, and potential implications. Next, the Committee received a report on the Capacity Auction Reforms project, including expected stakeholder amendments. Finally, the Committee reviewed management's response to the recommendations in the market monitors' annual reports.

The System Planning and Reliability Committee received a status update on Regional System Plan projects. The Committee also received an overview of asset condition projects, including new projects and projects placed in-service. Next, the Committee received an annual update on renewable resources development, and discussed renewable project development in the New England region, fully developed interconnection plans for multiple large projects, and increased uncertainty for future renewable development due to development and policy environments. The Committee then received updates on compliance with FERC's large load show-cause order, the Longer-Term Transmission Planning RFP, and a preview of activities related to FERC Order No. 1920 compliance. In addition, the Committee discussed the development of the structure needed to support the Asset Condition Reviewer role, including hiring staff with specialized skills and knowledge and developing the necessary documentation to support the work before the requested effective date of January 1, 2027.

The Compensation and Human Resources Committee discussed the employee health and benefit plan renewals for 2027. The Committee noted that the final negotiated rate increases for medical and dental coverage were lower than the initial estimates. In reviewing the 2027 compensation budget, the Committee considered comparative information, including national compensation surveys of projected 2027 merit and promotional

increase budgets for utilities and all industries, as well as data from other system operators. The Committee approved as reasonable and competitive a 3.5% merit increase and a 1.0% promotional/equity increase for the 2027 operating budget, acknowledging the need to continue monitoring market movement, business needs, talent trends, affordability, and stakeholder requests for work. The Committee then received an annual report on the workforce and Company culture. The Committee discussed workforce demographics, and cultivating culture through the values and attributes embedded in the Company's strategic objectives.

The Nominating and Governance Committee discussed the Joint Nominating Committee process for 2027, and reviewed the Company's board succession process. Next, the Committee received an update on the political environment, including state and federal topics, and discussed significant energy legislation and policies considered by federal and state policymakers this year. The Committee also discussed potential topics for upcoming meetings with the NEPOOL sectors, and reviewed plans for the open Board meeting in November. Next, the Committee discussed highlights of the Company's strategic planning process, and reviewed the succession process for the Board chair.

The Board of Directors meeting began with a strategic planning session on September 15. On September 17, the Board prepared for its upcoming joint meeting with the states. The Board then received a report from management, including updates on activities related to FERC, the federal executive and legislative branches, and the New England states. The Board also received updates on corporate scorecard progress, business continuity and security functions, and the use of artificial intelligence and related governance practices. Next, the Board received the report of the Compensation and Human Resources Committee, during which it approved revisions to the Committee's charter to include oversight of workforce safety and security policies. The Board then held an executive session to review management succession planning. Following the executive session, the Board received a report from the Chief Financial Officer that included an overview of directors and officers liability insurance coverage. The Board then discussed the proposed 2027 operating and capital budgets, including the states' comments on the budgets and the impact on retail ratepayers, and noted the remaining stakeholder process, after which the Board will vote on the budgets. The Board also reviewed plans for the upcoming open Board meeting in November. Next, the Board received reports from the standing committees. During the System Planning and Reliability Committee report, the Board approved revisions to the Committee's charter to add oversight of the Asset Condition Reviewer function effective upon FERC approval, review of corporate goals, and changes to capture reliability and system efficiency transmission planning among the transmission planning processes under the Committee's purview. Regarding annual meeting matters, the Board re-elected Ms. LaFleur as Chair of the Board of Directors, and adopted the committee assignments recommended by the Nominating and Governance Committee:

- Ms. Flax and Messrs. Corneli, Curran and Ivey shall serve on the **Audit and Finance Committee**, with Ms. Flax to serve as Chair;
- Mses. Anders, Guarini and LaFleur and Mr. Williams shall serve on the **Compensation and Human Resources Committee**, with Mr. Williams to serve as Chair;

- Mses. Anders and Guarini and Messrs. Curran, Vannoy and Williams shall serve on the **Information Technology and Cyber Security Committee**, with Mr. Curran to serve as Chair;
- Mses. Flax, Guarini and LaFleur and Messrs. Curran, Ivey, Vannoy and Williams shall serve on the **Joint Nominating Committee**, with Mr. Ivey to serve as Chair;
- Ms. Flax and Messrs. Corneli, Curran, and Ivey shall serve on the **Markets Committee**, with Mr. Corneli to serve as Chair;
- Mses. Flax and LaFleur and Messrs. Ivey and Vannoy shall serve on the **Nominating and Governance Committee**, with Mr. Vannoy to serve as Chair;
- Mses. Anders and Guarini and Messrs. Vannoy and Williams shall serve on the **System Planning and Reliability Committee**, with Ms. Anders to serve as Chair.

The Board also elected the Company's officers for the upcoming year, and reviewed director liaison assignments to individual states.

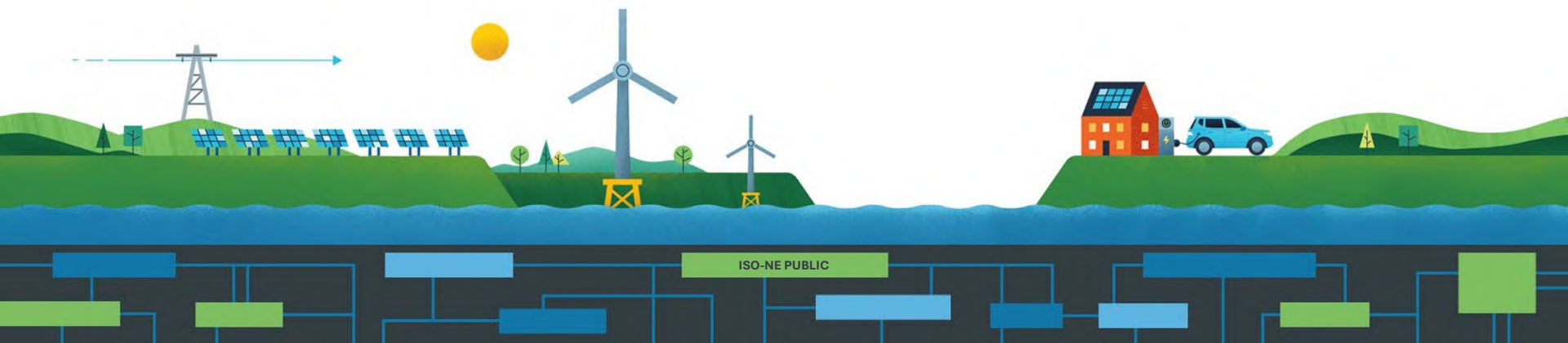
OCTOBER 2, 2026

ISO New England's 2027 Annual Work Plan (AWP)



Allison DiGrande

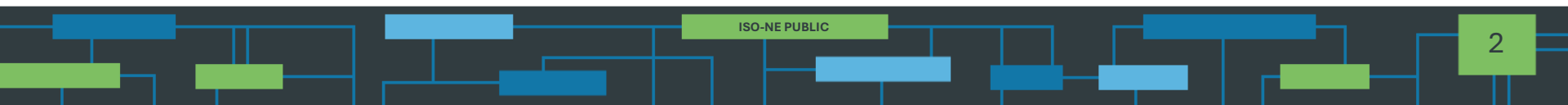
EXECUTIVE DIRECTOR | PARTICIPANT RELATIONS & SERVICES



2026 Leadership Transition and Strategic Planning



- With ISO New England's leadership transition this year, its Board of Directors and senior team are actively updating the organization's Strategic Plan through 2032
 - The ISO will discuss progress on the development of its future strategic priorities at both the Open Board and Participants Committee meetings in November 2026
- While the ISO may take initial steps in 2027 on some identified strategic initiatives, the organization is committed in the year ahead to the work outlined in this AWP, much of which involves completing the development and implementation of large projects already in progress
 - Any items coming out of the ISO's Strategic Plan that may target 2027 stakeholder discussions would be reflected in the 2027 AWP Update and reviewed with stakeholders in the spring
- Other new opportunities identified in the Strategic Plan for the next 5-7 years that are anticipated to become projects in future Annual Work Plans would be discussed with stakeholders through the AWP development process for the applicable year

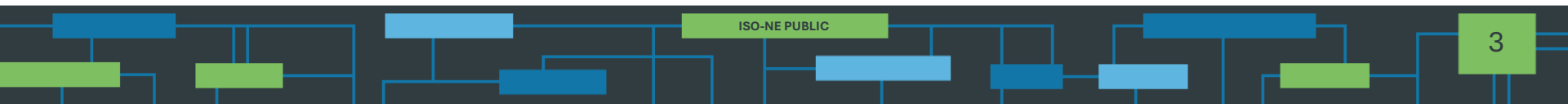


Regional Focus on Plan Is Essential

The ISO strives to support regional reliability and policy goals in a coordinated manner



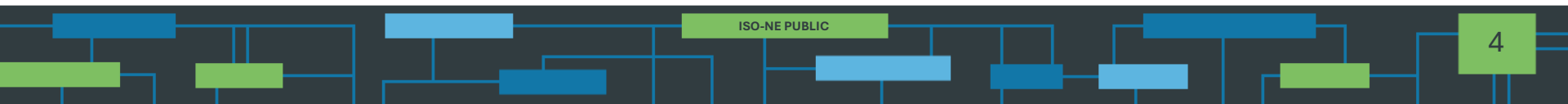
- Anchors and implementations will utilize the majority of ISO resources in 2027 and beyond due to their breadth
 - Upfront agreement on priority work, including NEPOOL and state priorities, is intended to keep listed projects and schedules on track
 - Increased or expanded stakeholder requests, regional policy interests, and new issues can affect project schedules of planned efforts
 - Unknown timing and topics of Federal Energy Regulatory Commission (FERC) actions (orders, notices of proposed rulemaking) and policy directives can shift priorities
- Note that the AWP identifies key initiatives and not the full ISO workload; the ISO's annual budget incorporates the full volume of ISO work and resourcing, including initiatives in the AWP as well as:
 - Work on smaller projects or projects nearing completion
 - Work to implement projects already through design, stakeholder, and regulatory phases
 - Work representing the ISO's extensive day-to-day operations related to running the grid, markets, IT infrastructure, and its organization



2027 Objectives and Highlights

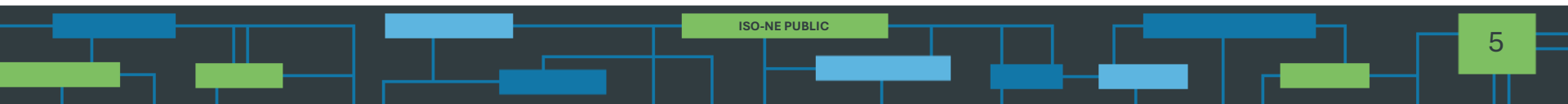


- **Anchor Projects and Related Core Implementations** are the highest priority initiatives across the ISO for innovating, securing, and advancing a reliable, cost-effective electric power system
 - **Capacity Auction Reforms:** Preparing and conducting the activities to run the 2028 auctions; developing conforming changes and assessing refinements
 - **Large Load Integration:** Complying with FERC's Large and Co-Located Loads Show Cause Order and developing related resource adequacy enhancements
 - **Asset Condition Reviewer:** Setup and implementation of the new independent review of Transmission Owners' asset condition project proposals for refurbishing aging transmission facilities; developing refinements and conforming changes
 - **Order No. 1920:** Complying with FERC's regional and interregional directives for transmission planning and cost allocation; includes developing rules for right-sizing
 - **Operating Reserves Demand Curve:** Developing a dynamic ORDC for existing real-time reserves to address operational uncertainties resulting from continued growth in PV, intermittent resources, and variability in real-time net load
 - **IT Implementation of Major Initiatives:** Developing the software and systems needed for implementing CAR and nGEM Single Interval Improvements
- **Notable Initiatives** target modernization, efficiency, and risk management across markets, planning, operations, and software structures



ANCHOR PROJECTS

Highest priority initiatives in 2027



Multi-Functional Anchor Project

Restructuring capacity auction timing and accreditation methods

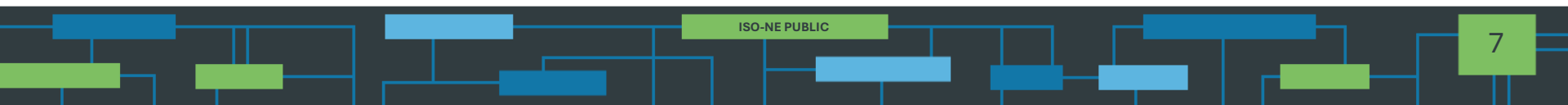
- Capacity Auction Reforms (CAR)

- CAR reforms for seasonal auctions and resource accreditation (CAR-SA) are on track to be filed by end of 2026 for a Q2 2027 effective date (see the most recent stakeholder schedule on slides 18-22 of this September 2026 NEPOOL Markets, Reliability, and Transmission Committees [presentation](#))
- Throughout 2027, the ISO will be preparing and conducting the activities to run the truncated 2028 summer auction and 2028-2029 winter auction
 - Consistent with the approach taken for major initiatives, preparations are expected to include conforming changes to rules and procedures and continued shaping of processes needed to implement the first auction
 - Any compliance requirements that FERC may issue in its CAR-SA order would also be addressed

Multi-Functional Anchor Project

Restructuring capacity auction timing and accreditation methods

- **Capacity Auction Reforms (CAR), cont'd**
 - As is typical following a foundational filing for a major initiative, the ISO will conduct further assessments to scope potential follow-on adjustments to the foundational design
 - The ISO is currently considering further assessments of areas that have been previously identified with stakeholders through discussion and feedback such as:
 - **Modeling** assessments of resource outage characteristics (e.g., correlated events such as ambient air conditions, EFORd calculations and representations of partial outage states), intermittent resource performance and load correlation, and storage modeling (e.g., continuing to study storage modeling and accreditation in other regions, software modeling capabilities, and how changes in the resource mix may impact accreditation)
 - **Mitigation** assessments, such as pivotal supplier test revisions (see the Internal Market Monitor's [2025 Annual Market Report](#)) and other updates
 - **Gas constraint** assessments, such as potential adjustments (e.g., gas constraint parameters) based on experience and data, and continued assessment of the interactions between firm supply and the gas constraint in the market clearing process
 - **Balancing ratio cap** assessments under the new accreditation structure that evaluate design options and their practical tradeoffs between maintaining strong performance incentives for overperformers and preventing resource performance obligations from exceeding their maximum capability while ensuring resources with equivalent CSO have the same obligations
 - In 2027, the ISO will begin scoping and prioritizing the assessments to develop a fuller plan for scheduling assessments to be undertaken in 2027, which would be discussed with stakeholders as part of the 2027 AWP Update process in Q1/Q2; assessments after 2027 would be discussed in future work plans
- Future assessments and enhancements are expected to evolve as market experience is gained



Multi-Functional Anchor Project

Large load integration compliance and enhancements

- **New England Large Loads Show Cause Order Compliance and Resource Adequacy Enhancements for Large Load Integration**

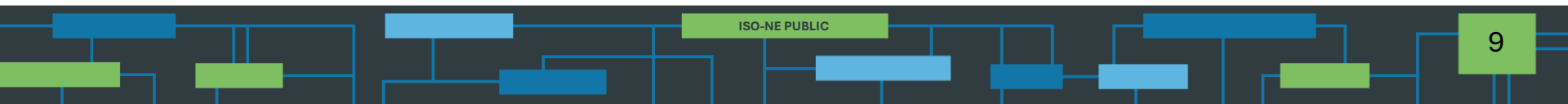
- On June 18, 2026, FERC issued a [show cause order](#) instituting a proceeding under Section 206 of the Federal Power Act (EL26-72-000) related to the integration of large loads and co-located load arrangements
- On Aug. 14, 2026, FERC accepted the ISO's and PTO's joint 90-day abeyance request as allowed in the June order; the ISO will submit by Nov. 16, a Section 205 filing that addresses the order's five categories of reform
- Additionally, the show cause order required submission of an [informational report](#) on resource adequacy; the ISO provided notice in its July 20, 2026, report filed with FERC that it is developing resource adequacy-related provisions to address large load interconnections and adverse reliability risks
 - **Bring Your Own New Generation [Capacity]:** Resolve various potential issues to ensure that each large load's expected usage is aligned with its incremental new capacity
 - **Separate Large Loads from the Installed Capacity Requirement in the Capacity Market:** Complementary to the Bring Your Own New Generation requirement, new large loads would not be included in the regional capacity requirements as these loads would be responsible for their own capacity
- Stakeholder discussions are underway (see [meeting materials](#)), with a Participant Committee vote planned for Nov. 12, 2026, on compliance-related provisions
- Related and conforming changes, such as to Operating Procedures, Planning Procedures, and additional resource adequacy components, will be discussed through Q1/Q2 2027, with implementation timeframes to be determined

Multi-Functional Anchor Project

Addressing operational uncertainty through markets

- **Dynamic Operating Reserves for a Changing System**

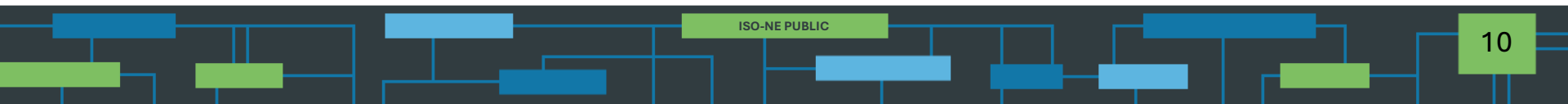
- The ISO has identified the system's continued need for flexible response capabilities to address operational uncertainties resulting from the region's growth in PV and wind intermittent power resources, and the increasing variability in the system's real-time net load (see the March 2026 [ISO memorandum](#) to the NEPOOL Markets Committee)
- The ISO is assessing and developing a dynamic Operating Reserves Demand Curve (ORDC) for incremental quantities of existing real-time reserve products (10- and 30-minute reserves), in amounts that vary during the operating day based on the system's near-term potential ramping needs
 - Probabilistic Real-Time Ramp Needs: As part of this effort, the ISO is developing dynamic methods to account for real-time system ramping needs (see *related Probabilistic Forecasting* on slide 20)
- The ISO plans to review a proposed cost impact analysis approach for feedback and input at the start of the stakeholder process
- Discussions are targeted to begin in Q2 2027, changed from previous estimates due to other time-bound initiatives in the early 2027 time period, with a filing anticipated no earlier than Q4 2027 for a potential 2028 effective date



Planning Anchor Project

AC Reviewer setup and implementation

- **Advancing Asset Condition Reviewer Role**
 - The ISO is developing a new function to provide oversight of Participating Transmission Owners' (PTO) Asset Monitoring and Evaluation Practices, Asset Condition Projects (ACPs), and ACP Programs
 - In close coordination with the states and stakeholders, the ISO developed this advisory role and robust process for additional, independent review of PTO asset condition projects
 - Proposed revisions to the Transmission Operating Agreement and the Open Access Transmission Tariff of the ISO Transmission, Markets and Services Tariff revisions were jointly filed by the ISO and Participating Transmission Owners Administrative Committee (PTO AC) on August 17, 2026
 - Subject to FERC acceptance, the proposed effective date is January 1, 2027
 - In 2027, work will focus on running the new process with ongoing setup to further develop processes
 - Drafts of the Asset Condition Review Process Guide will be shared with stakeholders starting in Q4 2026



Planning Anchor Project

Transmission planning compliance

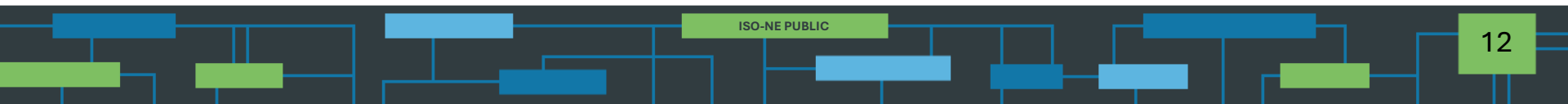
- **FERC Order No. 1920, 1920-A, 1920-B Compliance**
 - Stakeholder discussions began in September 2026 on compliance reforms for this suite of FERC Orders (see the NEPOOL Transmission Committee [presentation](#) for an overview of the requirements and stakeholder schedule)
 - The ISO is proposing to call the Order No.1920 process the Future Scenario Planning process; discussions are expected to include:
 - Proposal for switching from the sponsorship competitive solicitation model to a construction-bid model
 - Note that a separate Section 205 filing would be required to similarly change the competitive model used for reliability, system efficiency, and LTTP RFPs; additional discussions will occur during the LTTP Lessons Learned process starting in Q4 2026 at the Planning Advisory Committee (see *related* LTTP Enhancements on slide 15)
 - Requirements for considering whether selecting transmission facilities that incorporate alternative transmission technologies are more efficient or cost-effective than selecting new regional transmission facilities or upgrades to existing transmission facilities
 - Requirements for transmission right-sizing (see Transmission Right-Sizing on next slide)
 - Regional and interregional compliance filings are due June 2027 for a 2029 effective date

Planning Anchor Project

Transmission planning compliance and enhancements

- **Transmission Right-Sizing**

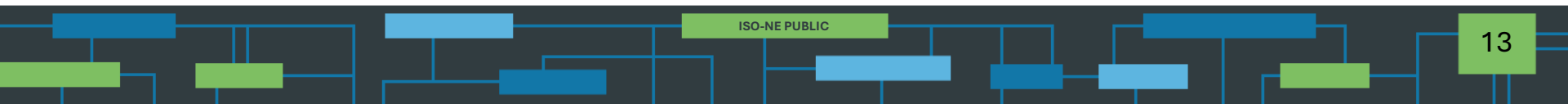
- Stakeholder discussions at the NEPOOL Transmission Committee are expected to begin in Q4 2026 on Tariff changes that would allow consideration of increasing the size of transmission equipment to account for potential future uses
- These rule changes would seek to:
 - Satisfy the Order No. 1920 requirements for the ISO to consider whether selecting transmission facilities that incorporate right-sizing is more efficient or cost-effective than planned asset condition projects in the 10-year forecast
 - Provide a path for consideration of right-sizing asset condition projects
 - Address the desire by regional stakeholders and the ISO to incorporate right-sizing considerations into transmission planning processes
- The ISO anticipates completing this initiative in time to be able to reference these new rules in the Order No. 1920 compliance filing
- After approval of the Tariff rules, the right-sizing process and input considerations would be developed and discussed at the Planning Advisory Committee for incorporation into the [Transmission Planning Guides](#)



Technology Anchor/Implementation Projects

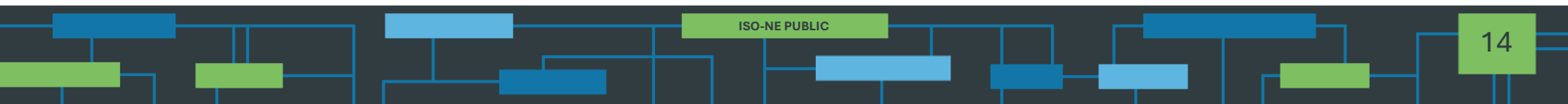
IT development and implementation of market and reliability initiatives to manage an exponentially complex future grid

- **nGEM Real-Time Market Clearing Engine: Single Interval Improvements**
 - The ISO is working in 2027 to move the Unit Dispatch System (UDS) and Location Marginal Pricing Calculator (LMPC) functions to the nGEM MCE, scheduled for completion in 2028
- **CAR Software and Systems Implementation**
 - The ISO is developing the software and systems changes needed to implement the Capacity Auction Reforms, including auditing, settlement and financial assurance, as well as new software systems to support the resource adequacy assessment process, the capacity qualification process, and new auction clearing mechanisms; see [participant training and readiness resources](#)



NOTABLE INITIATIVES

Other key initiatives identified for 2027

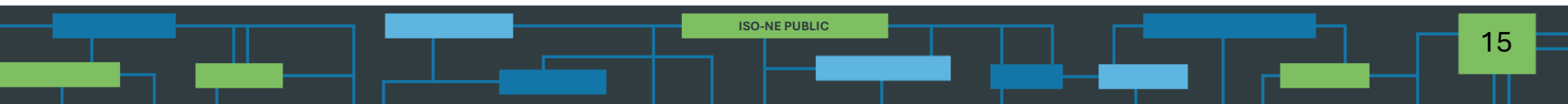


Notable Planning Initiatives

Transmission planning improvements

- **Longer-Term Transmission Planning Enhancements**

- In Q4 2026, the ISO plans to discuss with stakeholders lessons learned from implementing the [Longer-Term Transmission Planning \(LTP\)](#) to conduct the first Competitive Solicitation for LTP Solution ([2025 LTP RFP](#))
 - Discussions are expected to include consideration of switching from the sponsorship competitive solicitation model to a construction-bid model, in alignment with the Order No. 1920 proposal (see *related* Order No, 1920 Compliance on slide 11)
- Following the lessons-learned exercise, and after filing its Order No. 1920 compliance, the ISO expects to develop enhancements to the LTP process; stakeholder discussions are targeted to begin in Q3 2027



Notable Planning Initiatives, cont'd

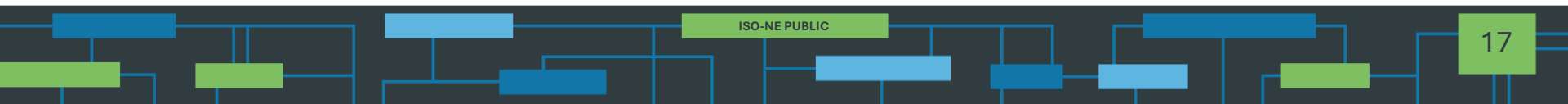
Generator interconnection enhancements

- **Order No. 2023 Interconnection Process Reforms Follow-On Enhancements**
 - In Q4 2026, the ISO plans to discuss with stakeholders lessons learned from implementing the Order No. 2023 Transitional Cluster Study
 - Following, the ISO expects to develop further enhancements to the Cluster Study rules and ensure resources entering and proceeding through Clusters are meeting the expectations for readiness; stakeholder discussions on enhancements are targeted to begin in Q2 or Q3 2027
- **Surplus Interconnection Service (Surplus IS) Part 1: Proposed Changes to Interconnection Rules to Resolve Gaps - 2026 NEPOOL Priority Continued**
 - In July 2026, the ISO published its stakeholder-requested [gap analysis](#) of existing interconnection rules to determine the need for and scope of potential solutions that would improve access and use of Surplus IS; the analysis was structured in two parts: Part 1) interconnection rules and Part 2) market participation
 - The ISO plans to develop changes to the interconnection rules as recommended in Part 1; stakeholder discussions are anticipated to begin in Q4 2026 or Q1 2027
 - Timing depends on progress of time-bound initiatives, including CAR, Large Load Show Cause compliance, and conducting the first Order No. 2023 Cluster Study
 - See next slide for Part 2 market participation

Notable Markets & Operations Initiative

NEPOOL request

- **Surplus IS Part 2: Analysis of Market Rules and Operational Considerations - 2026 NEPOOL Priority Continued**
 - The ISO plans to more thoroughly assess potential market participation gaps for Surplus resources as well as operational considerations that were initially identified in the 2026 stakeholder-requested [gap analysis](#); the assessment will inform the scope and timing of potential solutions
 - Stakeholder discussions of the assessment are targeted to begin in Q2 2027, after the CAR-SA order has been received to ensure the assessment aligns with the new capacity market rules or takes into account potential changes as directed by FERC



Notable Operations Initiative

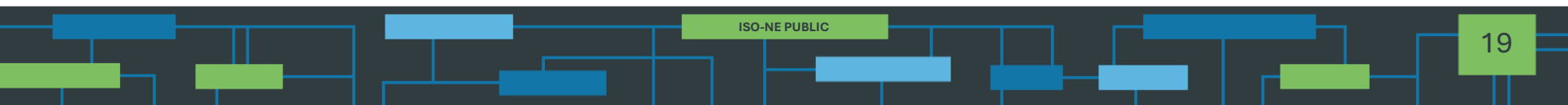
Dispatch adjustments for improved storage-resource compatibility

- **Enhancements for Storage Real-Time Dispatch and BESS Dispatch Compatibility, NEPOOL Priority Request for the 2027 AWP**
 - Stakeholders have requested an assessment of potential dispatch compatibility solutions, including updates to the Unit Dispatch System (UDS), to fully reflect the operating characteristics of fast-ramping storage resources in the ISO's real-time dispatch framework
 - Battery Energy Storage Systems (BESS) can respond nearly instantaneously and are concerned that premature ramping dispatch could result in inefficient use of their limited-energy capability
 - The ISO plans to address this request in two distinct but complementary work streams
 - First, in Q4 2026, the ISO will discuss with stakeholders its assessment of and plans for adjusting the existing UDS look ahead by year's end
 - Second, in 2027, the ISO expects to continue its assessment of the issues and identification of potential solutions related to the timing and ramping of dispatch signals, which it anticipates discussing with stakeholders in Q3

Notable Technology & Security Initiatives

Implementing sophisticated technologies and security applications to support a changing resource mix and mitigate risks

- **Inverter-Based Resource (IBR) Integration & Modeling:** In 2027, the ISO will continue its multi-year effort to design and implement an electromagnetic transient (EMT) model management process and repository. The ISO will also advance EMT simulation capabilities, including cloud-based computing, small-signal analysis, and full New England system modeling, and apply these capabilities to support planning and operational decision-making.
- **Synchrophasor and Advanced Measurements:** In a 2027 joint effort with the TOs, the ISO will develop enhancements to its production-grade synchrophasor system within the CIP environment by expanding external PMU data exchange and establishing operational procedures to support real-time grid awareness and decision-making; additional priorities include defining measurement requirements for large loads, assessing next-generation measurement capabilities such as point-on-wave (POW) data infrastructure, and developing analytical tools to assess resource dynamic performance during grid events and support compliance evaluations.
- **Integrated Market Simulator (IMS):** In 2027, the ISO expects to introduce multiple interval dispatch and pricing function into the IMS, implement and benchmark the energy storage model with production system per FERC Order No. 841, and deploy IMS in a cloud environment for IMM usage and market design evaluation.



Notable Technology & Security Initiatives, cont'd

Implementing sophisticated technologies and security applications to support a changing resource mix and mitigate risks

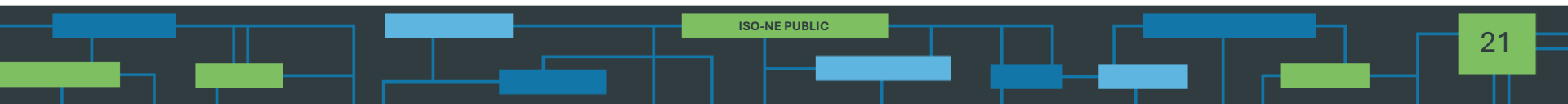
- **Probabilistic Forecasting**

- In 2027, the ISO will continue development of an Uncertainty Quantification model and framework to provide more accurate, probabilistic forecasts of key operational parameters on day-ahead and intra-day timeframes, such as system net load and hourly capacity margin
 - The model considers uncertainty sources such as wind and solar generation, load, forced outages, and interchange schedules
- Near-term objectives are to enhance risk-informed operational planning and reliability assessments over operational-horizon timeframes
- Intra-day probabilistic forecasts of net load and related uncertainties will be incorporated into the Dynamic Operating Reserves proposal to be discussed in 2027 (see *related* ORDC initiative on slide 9)

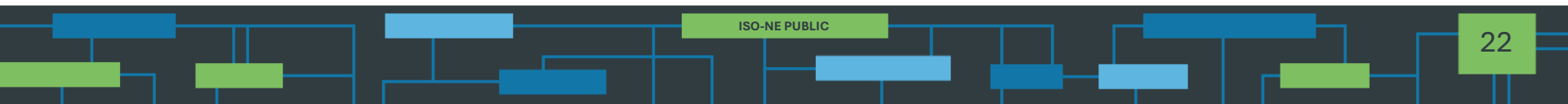
Notable Technology & Security Initiatives, cont'd

Implementing sophisticated technologies and security applications to support a changing resource mix and mitigate risks

- **Artificial Intelligence:** The ISO will be scaling AI usage over the coming years to develop and optimize advanced technologies, maintain and support new and improved tools for planning, system operations, and market operations; strengthen forecasting, modeling, and simulation analytics and capabilities; and bolster cyber defense
- **Cloud Computing:** The ISO's transition to a cloud environment continues to be a major effort over the next several years to minimize technology infrastructure maintenance costs, speed deployment of software, increase scalability and flexibility, and enable faster computing performance needed to reliably operate a modern system as resource data grows
- **Cyber Security:** The ISO has made significant cyber security investments to date and over the next several years will continue to invest in improved monitoring, detection, and recovery tools to keep pace with increasingly sophisticated attack threats

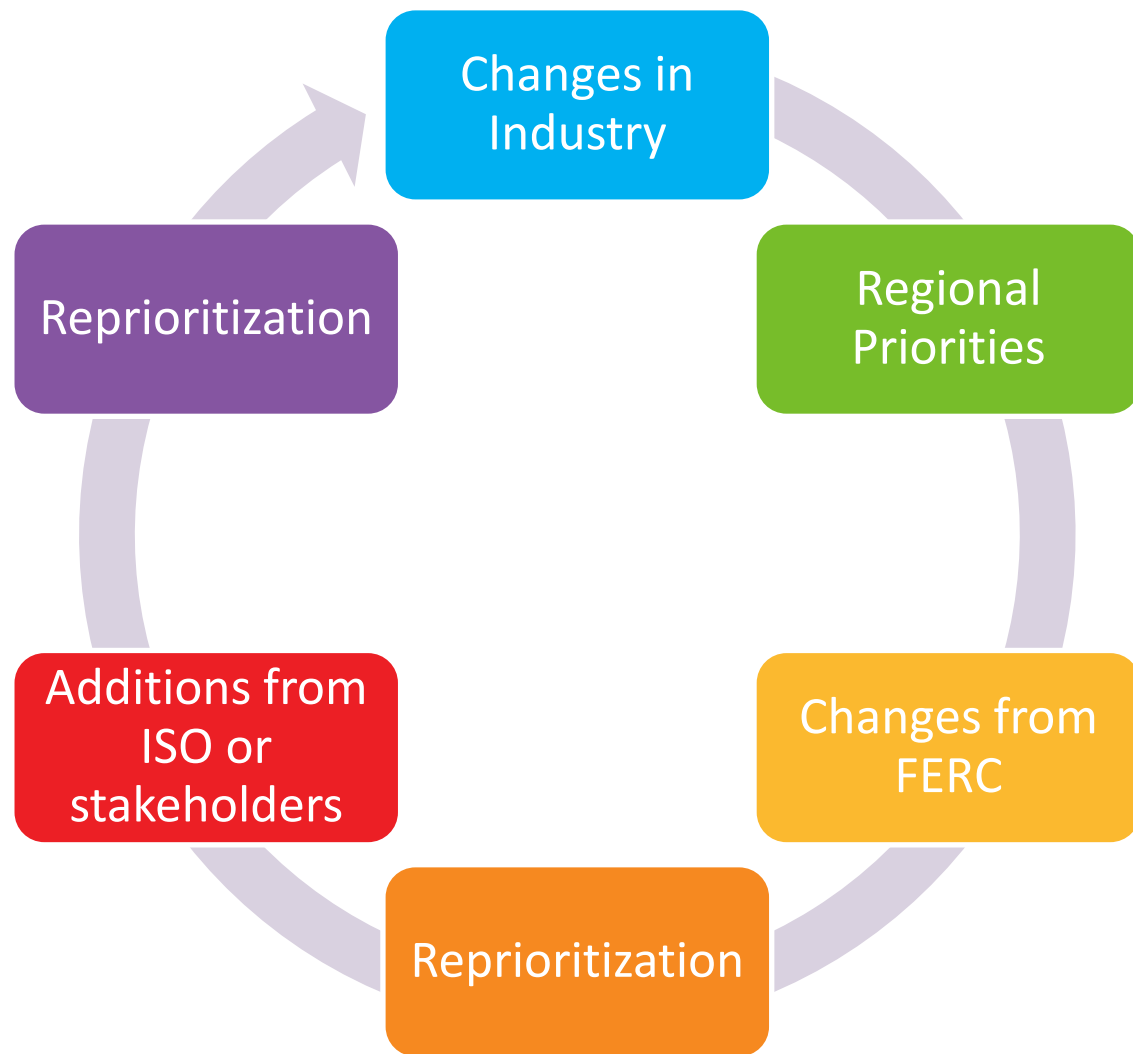


WORK PLAN PRIORITIZATION

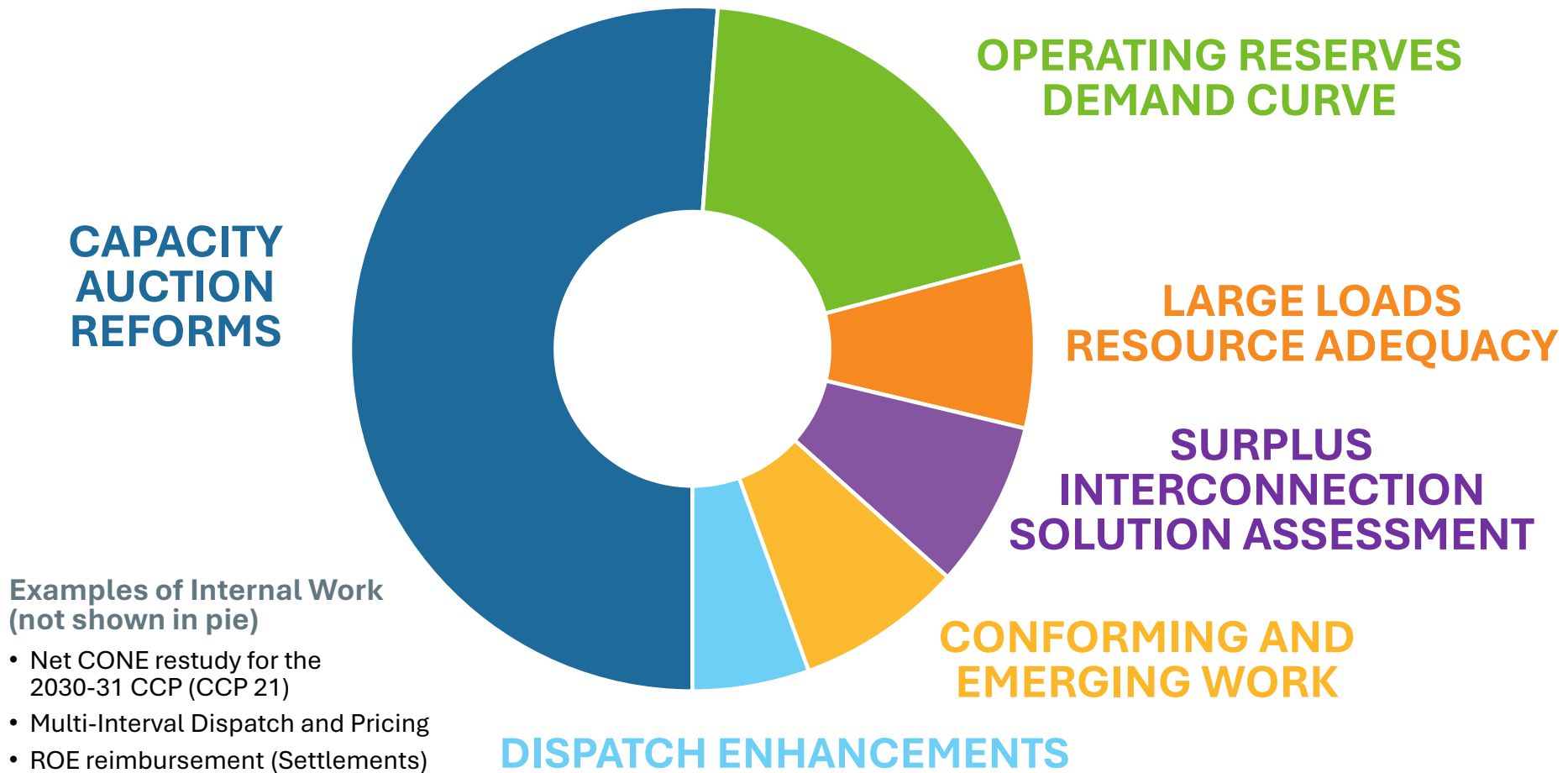


Prioritization Process

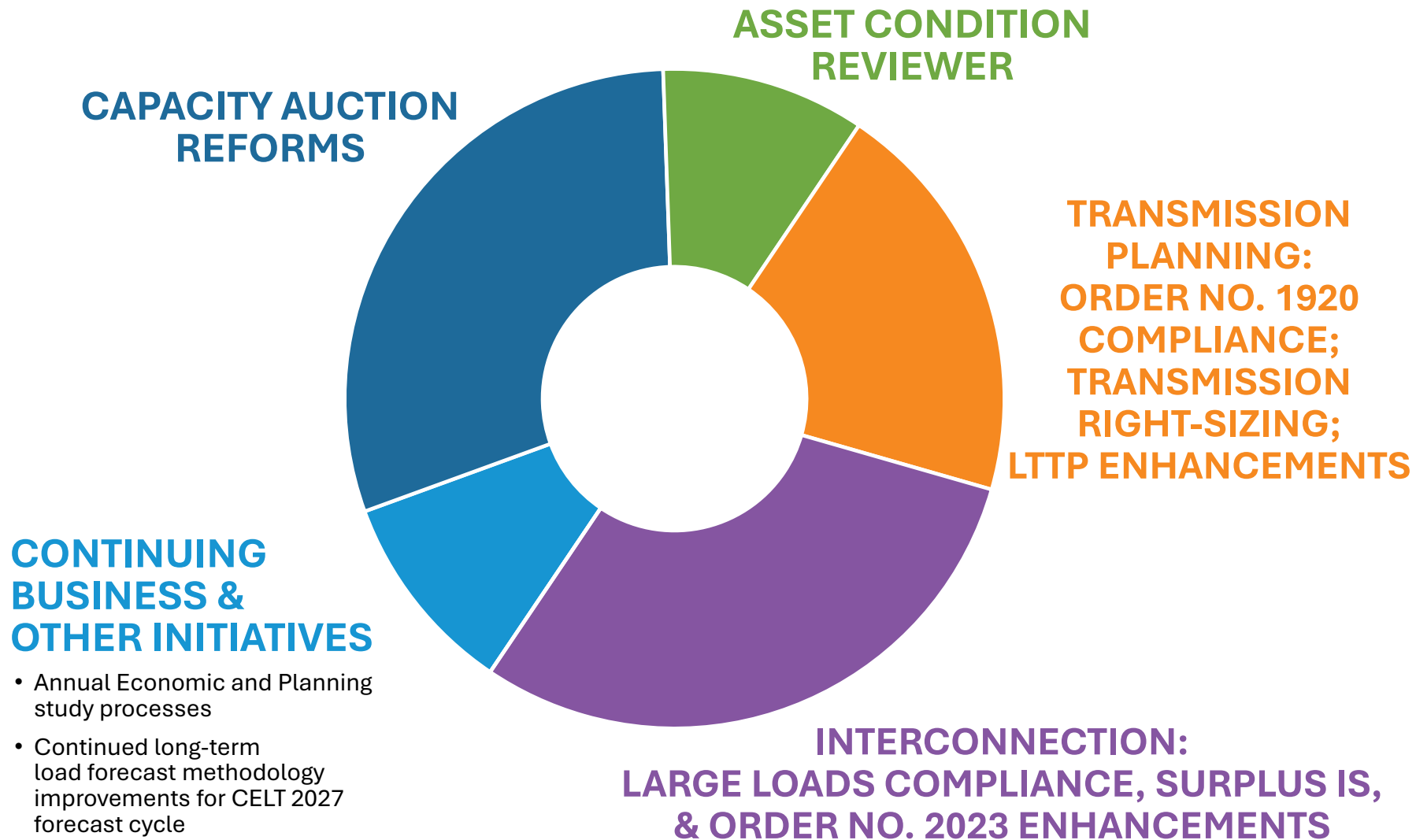
- The ISO adjusts its priorities as needed to best maintain reliable operations, robustly plan for a changing grid, and ensure competitive wholesale markets
- Planned projects are impacted as scopes shift or new projects emerge



Markets/Operations Project Priorities Include:



Planning Project Priorities Include:



Capital Project Priorities Include:

nGEM SINGLE INTERVAL IMPROVEMENTS



SOFTWARE AND SYSTEMS IMPLEMENTATIONS

- Capacity Auction Reforms – Large volume of change and new functionality
- Order No. 2222 Customer and Asset Management (CAMS) enhancements
- MW Dependent Fuel Price Adjustment (Dynergy Compliance) (Q4 2027 implementation)

INFRASTRUCTURE ENHANCEMENTS

- Settlement Market System Technology Upgrade
- Total Transfer Capability Utility (TTCU) Implementation for Resource Outage Coordination
- Market Info System to Cloud
- 2027 Issue Resolution Projects
- GridOS Connect
- Tie Line Telemetry Replacement
- DASI Benchmark Calculation Enhancements

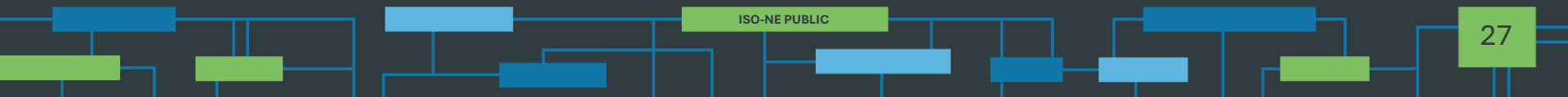
AI, CLOUD COMPUTING, CYBER SECURITY

IBR MODELING/INTEGRATION, SYNCHROPHASOR ENHANCEMENTS, IMS

2027 AWP	Q1	Q2	Q3	Q4
Multi-Functional (Markets, Planning, Operations)	Capacity Auction Reforms: Implementation, Conforming Changes, & Follow-On Work			
	Large Loads: Compliance and RA		Further FERC Compliance TBD	
		Operating Reserves Demand Curve		
	Surplus IS P1 Solutions & P2 Assessment			
Planning	Asset Condition Reviewer Setup and Implementation			
	Order No. 1920 Compliance		Further FERC Compliance TBD	
	Transmission Right-Sizing			
	LTTP Lessons Learned		LTTP Tariff Updates	
		Order No. 2023 Process Enhancements		
Operations			Dispatch Enhancements Part 2	
Technology	nGEM Single Interval Improvements			
	CAR Systems and Software Implementations			
	IBR Modeling, Synchrophasor Enhancements, IMS, Probabilistic Forecasting			
	Artificial Intelligence, Cloud Computing, Cyber Security			

Approximate Stakeholder Discussion Timing

Initiatives in **bold** are Anchor Projects



MEMORANDUM

TO: NEPOOL Participants Committee Members and Alternates

FROM: Rosendo Garza and Pat Gerity, NEPOOL Counsel

DATE: September 25, 2026

RE: 2027 ISO Budgets and 2027 NESCOE Budget

At its October 2, 2026 meeting, the Participants Committee (NPC) will be asked to vote on the ISO's proposed 2027 operating and capital budgets (collectively, the ISO Budgets) and NESCOE's 2027 operating budget (NESCOE Budget). Background materials are included with this memorandum and posted with the meeting's composite materials.

2027 ISO Budgets

The 2027 ISO Budgets were developed in accordance with the processes set forth in the Participants Agreement and Settlement Agreement with state agencies in FERC Dockets Nos. ER13-185 and ER13-192. The ISO presented its preliminary budgets to New England state officials on June 8, 2026, and to the NPC at its June 15 Summer Meeting. On August 7, the ISO presented the budgets to the Budget & Finance Subcommittee (B&F) and, later that same day in a separate meeting, to state officials. At the September 3 NPC meeting, Ms. Kelly Reyngold, Vice President and Chief Financial Officer, provided an overview of the ISO Budgets (Sep NPC Presentation) and offered to answer any questions. Following that meeting, certain New England state regulators and consumer advocates raised questions and comments on the budgets, to which the ISO responded (States Q&As).

Included with this memorandum is the following:

- a memorandum from Ms. Reyngold providing additional information on changes to the ISO Budgets and the Sep NPC Presentation since the September 3 NPC meeting;
- an updated Sept NPC Presentation;
- the ISO's September 22 memorandum regarding its projected costs and allocation among the schedules under the ISO's "Self-Funding Tariff" (Tariff Section IV.A);¹
- a copy of the States' Q&As; and
- a copy of State Officials' comments on the ISO Budgets and the ISO's response thereto.

¹ The September 22 memorandum, circulated directly to NPC members and alternates and B&F members, addresses the projected 2027 revenue requirement. It includes the final true-up for 2025 and a comparison to the 2026 Revenue Requirement, the Draft 2027 Revenue Requirement by activity, and the Draft 2027 Rate Components.

The ISO's 2027 operating budget, before true-ups, reflects a 7.3% increase over the 2026 operating budget. After accounting for the true-up mechanism in the Tariff, the revenue requirement to fund the 2027 operating budget (i.e., the amount collected under the ISO's administrative costs tariff (Section IV of the Tariff)) will increase by 10.2% over the amount projected to be collected in 2026. The ISO's capital budget for 2027 is \$45 million, which represents \$2.5 million over the 2026 capital budget.

The following form of resolution can be used by the NPC for action on the 2027 ISO Budgets:

RESOLVED, that the Participants Committee supports the Year 2027 operating and capital budgets proposed by the ISO, as presented at this meeting.

2027 NESCOE Budget

Ms. Heather Hunt, NESCOE's Executive Director, attended the August 7 B&F meeting and reviewed NESCOE's expected 2027 budget, estimated to be approximately \$3 million. NESCOE's August 7 B&F presentation was included with the materials for the September 3 NPC meeting and is included with this memorandum, with changes only to p. 12 to reflect the final Network Load factor and a resulting updated 2027 Schedule 5 rate of \$0.00942 per kw-mo.

The Participants Committee may use the following form of resolution in its consideration of the proposed 2027 NESCOE Budget:

RESOLVED, that the Participants Committee supports the Year 2027 NESCOE budget, as presented at this meeting.



memo

To: NEPOOL Participants Committee Members and Alternates

From: Kelly Reyngold, VP and Chief Financial Officer

Date: October 2, 2026

Subject: ISO New England's 2027 Proposed Operating and Capital Budgets

This memo is intended to provide the NEPOOL Participants Committee ("NPC") an update on the ISO's 2027 operating and capital budgets (the "Budgets") since the last review of the Budgets at the September 3, 2026 NPC meeting. As explained below, the 2027 Budgets remain unchanged although materials have been updated to incorporate more detailed information developed during our continuous business planning activities.

Summary of 2027 Budgets

The 2027 operating budget has not changed from what was presented at the September NPC meeting. As the ISO seeks to offer increasing value to the region, we have allocated separate line items totaling \$2.4 million covering resources for the Asset Condition (AC) Reviewer function (\$2.2 million) and for a second Longer-Term Transmission Planning (LTP) study (\$0.2 million). Monies not spent on these two initiatives will be returned through the annual true-up process. The proposed baseline operating budget for 2027 is \$21.6M or 6.5% above the 2026 approved budget. Incorporating the AC Reviewer and LTP services requested by states and other stakeholders increases the proposed budget by \$2.4 million resulting in a total increase of \$24.0 million (7.3%) over the 2026 approved budget. Including both the requested AC Reviewer and LTP services and prior year true-ups, the 2027 Revenue Requirement reflects a \$32.0M increase.

The 2027 capital budget remains unchanged at \$45.0 million. However, the capital projects plan has been updated to reflect recently chartered projects, revised projects budgets, revised targeted completion dates, adjustments to spending allocations across years, or projects with name changes. Updates associated with projects that recently progressed from the planning stage to chartered status, include the Next-Generation Electronic Dispatch & Reliability Voice Networks, Electromagnetic Transient Model Repository (EMTR), MW Dependent Fuel Price Adjustment, Integrated Market Simulator Usability, Enterprise Resource Planning (ERP) Enhancements, and Tie Line Telemetry Replacement projects. Revisions were also made to several capital projects in the 2027 capital budget, including Settlement Market System Technology Upgrade, TCU Implementation for Resource Outage Coordination, Migration of the Market Information System (MIS) File Transfer Protocol (FTP) Server to the Cloud, Microsoft 365 Phase III, and Circuit Inventory Management Platform Phase II. These changes reflect updates to overall project budgets and annual spending allocations. In addition, two projects have been renamed. Distributed Energy Resources (DER) – Order 2222 Phase II was previously titled *CAMS – Order 2222 Enhancements*, and DASI Benchmark Calculation Versioning Enhancements – IMM was previously titled *DASI Benchmark Calculation Enhancements*.

Materials

The August 7, 2026 budget presentation (the "Budget Presentation") presented to the NEPOOL Budget and Finance Subcommittee has been updated to reflect the changes described above. The updated Budget Presentation can be found at the following link:

[a07 bfs 2026 08 07 iso proposed budget 2027 updated september.pdf](#)

The 2027 state agencies' written comments and the accompanying responses can be found at the following link: [a07_bfs_2026_08_07_states_2027_budget_response.pdf](#)

Budget Presentation Slide Changes

The following pages have been updated in the Budget Presentation for the changes noted.

Operating Budget Slide page changes:

- To reflect the Board Compensation and Human Resources Committee approval of 2027 merit and promotion/adjustment amounts: 98

Capital Budget Slide page changes:¹

- Changes due to budget status (Chartered or Planning/Conceptual Design), budget, completion date or name: 63, 64, 65, 120, 121, 122, 123, 125, 127, 142, 145, 146, 149 and 151

Please let me know if you have any questions in advance of our meeting. I look forward to our discussion.

¹ The *order* of the Capital Budget slides containing project descriptions, on slides 121-148 of the updated budget presentation, has changed from the original presentation because of the insertion of the newly chartered projects and changes to the budgeted amounts as noted above.



memo

To: NEPOOL Budget & Finance Subcommittee and Participants Committee

From: Kelly Reyngold

Date: September 22, 2026

Subject: Projected 2027 Revenue Requirement for ISO New England Administrative Cost Tariff Schedules

To help our Participants prepare their 2027 budgets and consistent with information provided in previous years, this memo includes a preliminary indication of ISO-NE's 2027 costs and related tariff schedules. Specifically, the memo includes (1) the estimated 2027 Revenue Requirement, including the final true-up for 2025 and a comparison to the 2026 Revenue Requirement (see Exhibit 1 below), (2) the Draft 2027 Revenue Requirement by activity (see Exhibit 2), and (3) the Draft 2027 Rate Components (see Exhibit 3). Exhibits 2 and 3 are attached and, in their final form, will be part of the ISO's budget filing with FERC. The cost assignment and allocation mechanisms that were utilized in the Draft 2027 tariff schedules were established in accordance with the 2001 settlement and consistent with the assignment and allocation mechanisms that have been used for the last twenty-five years.

Overall Change in Revenue Requirement

As shown in Exhibit 1 below, the overall Revenue Requirement has increased by \$32.0 million year-over-year, from \$314.4M for 2026 to \$346.4M for 2027.¹ The change includes a \$24.0 million increase in the revenue requirement before taking into account the change in prior year true-ups. Prior year true-ups resulted in an increase of \$8.0M. The 2026 tariff included a \$15.6M revenue requirement decrease for the final 2024 true-up, while the 2027 tariff will include a decrease of \$7.6M as a result of the final 2025 true-up.

Draft Exhibit 1				
ISO New England Revenue Requirement By Tariff Schedule 2027 Estimated Amount vs. 2026 Filed Amount				
	Sch 1	Sch 2	Sch 3	Total
2027 Revenue Requirement Before Prior Year True Ups	\$ 77,031,397	\$ 171,250,473	\$ 105,746,759	\$ 354,028,630
2026 Revenue Requirement Before Prior Year True Ups	68,040,034	161,098,608	100,852,848	329,991,490
\$ Increase/(Decrease) from 2026 to 2027	8,991,363	10,151,866	4,893,911	24,037,140
% Increase/(Decrease) from 2026 to 2027	13.2%	6.3%	4.9%	7.3%
2027 Revenue Requirement Prior Year True Ups-Under/(Over) Collect	\$ 363,514	\$ (4,454,515)	\$ (3,526,463)	\$ (7,617,464)
2026 Revenue Requirement Prior Year True Ups-Under/(Over) Collect	(2,470,230)	(6,336,845)	(6,794,645)	(15,601,720)
\$ Increase/(Decrease) from 2026 to 2027	2,833,744	1,882,330	3,268,182	7,984,256
2027 Revenue Requirement Including Prior Year True-Ups	\$ 77,394,911	\$ 166,795,958	\$ 102,220,296	\$ 346,411,166
2026 Revenue Requirement Including Prior Year True-Ups	65,569,804	154,761,763	94,058,203	314,389,770
\$ Increase/(Decrease) from 2026 to 2027	11,825,108	12,034,195	8,162,094	32,021,396
% Increase/(Decrease) from 2026 to 2027	18.0%	7.8%	8.7%	10.2%

¹ Minor variances may appear due to rounding among the various presentations and schedules for the 2027 Budgets.

Change in Revenue Requirement by Schedule

Before true-ups in 2027 and 2026, the 2027 Revenue Requirement reflects an overall increase of \$24.0M or 7.3% over the 2026 Revenue Requirement. By tariff schedule, the changes are Schedule 1, a \$9.0M or 13.2% *increase*; Schedule 2, a \$10.2M or 6.3% *increase*; and Schedule 3, a \$4.9M or 4.9% *increase*.

The Tariff Schedule 1 increase of \$9.0M is attributable to:

- Increases impacting all three schedules include Compensation costs associated with merit, promotional, and incentive programs aligned with market data; Information Technology and Advanced Technology Solutions expenses for personnel and products driven by investments in cybersecurity, new or enhanced licensing for System Planning and Operations applications, initiatives to formalize and expand the use of Artificial Intelligence and Machine Learning across ISO-NE, support for transitioning internally developed advanced technologies into production environments to enhance situational awareness, and inflationary and vendor-driven price increases across the computer services portfolio; and Consulting and Professional Fees, primarily driven by information technology and cybersecurity requirements, including advisory and research services, system patching, and increased consultant utilization resulting from additional support hours, a greater emphasis on operational support activities versus development efforts, and reduced staffing vacancies.
- Funding to establish the Asset Condition Reviewer function, including FTEs and supporting professional services to develop and manage this function; Depreciation Expense associated with the Managing Transmission Line Ratings project, which is scheduled to enter production in December 2026; and Transmission Planning study costs including a system-wide thermal assessment driven by FERC Order 881 requirements, regional studies related to OATT and Cluster Enabling Transmission Upgrades, and funding for potential Longer-Term Transmission Planning study anticipated to be requested in 2027.

The Tariff Schedule 2 increase of \$10.2M is attributable to:

- Schedule 2 expense increases reflect funding for the items affecting all three schedules, as described above in the Schedule 1 explanation.
- Depreciation Expense is a net reduction for Schedule 2, primarily due to the nGEM Market Clearing Engine (Day-Ahead)² becoming fully depreciated in 2026. This reduction is partially offset by depreciation expense associated with the nGEM Real-Time Market Clearing Engine, which is scheduled to enter production in mid-2026.

The Tariff Schedule 3 increase of \$4.9M is attributable to:

- Schedule 3 expense increases reflect funding for the items affecting all three schedules, as described above in the Schedule 1 explanation.
- Funding for work associated with the Tariff-required Net Cost of New Entry (CONE) recalculation.
- Increases in NPCC and NERC dues.
- Partially offsetting Schedule 3 expense increases is a reduction in Capacity Auction Reforms design consulting and project management costs as the initiative transitions from the design phase to development.

The ISO 2027 Revenue Requirement will be reviewed and voted on at the October 2, 2026 NPC meeting. Should you have any questions regarding the information provided in this memo, do not hesitate to contact me.

² The nGEM Market Clearing Engine (Day-Ahead) Implementation, completed in June 2023, included the following projects that began depreciating: CIMNET Simultaneous Feasibility Test with Data Transfer Enhancements, nGEM Value Added Development, nGEM Market Clearing Engine Implementation, nGEM Software Development Parts I and II, and nGEM Hardware Phase I and II. These projects became fully depreciated in 2026.

Exhibit 2
Page 1 of 6

DRAFT

Line No.	Activity Code		Allocation Factor (1)	Self-Funding Tariff			
	No.	Description		Total (2)	Schedule 1	Schedule 2	Schedule 3
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
1		<u>Administration-CEO</u>					
2	12651	Indirect Administrative Support	Total Dir Labor	\$ 15,479,469	\$ 3,335,825	\$ 8,010,625	\$ 4,133,018
3	12652	NEPOOL Committee Support	Total Dir Labor	2,510	541	1,299	670
4	12654	National Committee Support	Total Dir Labor	31,242	6,733	16,168	8,342
5	12657	Indirect Administrative Support for BCC	Total Dir Labor	613,727	132,258	317,604	163,865
6	19001	NEPOOL Committee Support	Total OPS Labor	17,841	4,781	8,555	4,505
7	19003	National Committee Support	Total OPS Labor	14,117	3,783	6,769	3,565
8	19005	Indirect Supervision/Clerical Support	Total OPS Labor	783,943	210,097	375,900	197,945
9	19009	Renewable Resource Integration	Alloc-Fixed	936	-	-	936
10		Total		16,943,785	3,694,019	8,736,920	4,512,846
11							
12		<u>Finance</u>					
13	11601	Payroll Administration	Total Dir Labor	567,931	122,389	293,904	151,637
14	11701	Accounts Payable	Total Dir Labor	389,127	83,857	201,373	103,897
15	11702	Procurement	Total Dir Labor	391,043	84,270	202,365	104,409
16	11901	Settle for Power Transactions	Total Dir Labor	48,641	10,482	25,172	12,987
17	12001	Budgeting and Forecasting	Total Dir Labor	1,120,583	241,486	579,902	299,196
18	12017	Forward Capacity Market (FCM) Reforms	Alloc-Fixed	170	-	-	170
19	12030	FinOps Management	Total Dir Labor	98,554	21,238	51,002	26,314
20	12101	Ledger Closing, Financial Statements and Tax Reporting	Total Dir Labor	839,865	180,991	434,630	224,244
21	12201	Treasury and Cash Management	Total Dir Labor	1,898,949	409,223	982,706	507,019
22	92004	Depreciation Expense 2004 Assets	Alloc-Fixed	43,160	8,660	22,765	11,735
23	92005	Depreciation Expense 2005 Assets	Alloc-Fixed	773,169	163,467	402,125	207,577
24	92006	Depreciation Expense 2006 Assets	Total Dir Labor	568,947	122,608	294,430	151,909
25	92007	Depreciation Expense 2007 Assets	Total Dir Labor	156,295	33,682	80,883	41,731
26	92008	Depreciation Expense 2008 Assets	Total Dir Labor	548	118	284	146
27	92009	Depreciation Expense 2009 Assets	Total Dir Labor	1,230	265	637	328
28	92010	Depreciation Expense 2010 Assets	Total Dir Labor	-	-	-	-
29	92012	Depreciation Expense 2012 Assets	Total Dir Labor	80,431	17,333	41,623	21,475
30	92013	Depreciation Expense 2013 Assets	Total Dir Labor	827,131	178,247	428,040	220,844
31	92014	Depreciation Expense 2014 Assets	Total Dir Labor	73,004	15,732	37,780	19,492
32	92015	Depreciation Expense 2015 Assets	Total Dir Labor	-	-	-	-
33	92016	Depreciation Expense 2016 Assets	Alloc-Fixed	3,248	700	1,681	867
34	92017	Depreciation Expense 2017 Assets	Alloc-Fixed	48,633	10,480	25,168	12,985
35	92018	Depreciation Expense 2018 Assets	Alloc-Fixed	2,106	454	1,090	562
36	92019	Depreciation Expense 2019 Assets	Alloc-Fixed	10,597	2,284	5,484	2,829
37	92020	Depreciation Expense 2020 Assets	Alloc-Fixed	51,430	11,083	26,615	13,732
38	92021	Depreciation Expense 2021 Assets	Alloc-Fixed	100,894	21,743	52,213	26,939
39	92022	Depreciation Expense 2022 Assets	Alloc-Fixed	839,891	59,307	541,113	239,472
40	92023	Depreciation Expense 2023 Assets	Alloc-Fixed	5,065,102	1,057,217	2,501,823	1,506,063
41	92024	Depreciation Expense 2024 Assets	Alloc-Fixed	9,467,510	2,077,077	4,870,137	2,520,295
42	92025	Depreciation Expense 2025 Assets	Alloc-Fixed	11,638,198	2,365,776	6,405,882	2,866,540
43	92026	Depreciation Expense 2026 Assets	Alloc-Fixed	9,123,983	1,770,250	5,052,999	2,300,734
44	92027	Depreciation Expense 2027 Assets	Alloc-Fixed	1,724,737	230,035	622,074	872,628
45	99707	Amortization of Land Recovery	Alloc-Fixed	39,300	2,460	24,170	12,670
46	99995	NPCC/NERC Dues	Alloc-Fixed	11,066,730	-	-	11,066,730
47	99996	Operating Contingency	Total Dir Labor	700,000	150,850	362,250	186,900
48	99996	Operating Contingency	Total Dir Labor	3,000,000	646,500	1,552,500	801,000
49	99998	Payroll & Other Accruals	Total Dir Labor	21,141,054	4,555,897	10,940,496	5,644,661
50		Total		81,902,191	14,656,161	37,065,312	30,180,719
51							
52		<u>Facilities & Security</u>					
53	12664	Building Maintenance	Total Dir Labor	3,529,336	760,572	1,826,432	942,333
54		Total		3,529,336	760,572	1,826,432	942,333
55							
56		<u>Market & Credit Risk</u>					
57	12005	Credit Administration	Total Dir Labor	2,637,894	568,466	1,365,110	704,318
58		Total		2,637,894	568,466	1,365,110	704,318
59							
60		<u>Human Resources</u>					
61	12661	Employee Affairs (Recreation Committee)	Total Dir Labor	205,709	44,330	106,455	54,924
62	12701	Recruiting/Interviewing	Total Dir Labor	1,567,430	337,781	811,145	418,504
63	12702	Intern Expense	Total Dir Labor	802,184	172,871	415,130	214,183
64	12901	Benefit Administration	Total Dir Labor	1,584,845	341,534	820,157	423,154
65	12951	Compensation	Total Dir Labor	1,635,913	352,539	846,585	436,789
66	12961	HR - General	Total Dir Labor	2,288,769	493,230	1,184,438	611,101
67	12962	HR - Training	Total Dir Labor	2,834,168	610,763	1,466,682	756,723
68	13410	Power Training & Development	Total Dir Labor	766,687	165,221	396,761	204,705
69	13411	Markets Training & Development	Total Dir Labor	71,256	15,356	36,875	19,025
70	13412	People Training & Development	Total Dir Labor	920,882	198,450	476,557	245,876
71	13413	Business Skills Training & Development	Total Dir Labor	337,427	72,716	174,619	90,093
72	13414	Technology Training & Development	Total Dir Labor	1,029,978	221,960	533,014	275,004
73	13603	Controls-related Compliance Training	Total Dir Labor	23,014	4,960	11,910	6,145
74	13901	Performance Eval/Salary Review	Total Dir Labor	67,511	14,549	34,937	18,025
75	22311	Employee Development	Total Dir Labor	1,475	318	763	394
76		Total		14,137,248	3,046,577	7,316,026	3,774,645

Exhibit 2
Page 2 of 6

DRAFT

Line No.	Activity Code		Allocation Factor (1)	Self-Funding Tariff			
	No.	Description		Total (2)	Schedule 1	Schedule 2	Schedule 3
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
1		<u>Legal & Compliance</u>					
2	12422	Interconnection Queue	Alloc-Fixed	192,194	-	-	192,194
3	12426	GC - Interconnection Agreements	Alloc-Fixed	128,129	-	64,065	64,065
3	12502	Board of Directors	Total Dir Labor	326,510	70,363	168,969	87,178
4	12508	Energy Markets / Complaints / Rule Changes	Alloc-Fixed	2,120,941	-	2,120,941	-
5	12513	Miscellaneous Labor Matters	Total Dir Labor	120,000	25,860	62,100	32,040
6	12514	NEPOOL Participants Committee	Total Dir Labor	198,631	42,805	102,792	53,035
7	12517	Administrative and Clerical Support	Total Dir Labor	525,936	113,339	272,172	140,425
8	12543	Independent Market Advisor	Alloc-Fixed	1,500,120	-	1,050,084	450,036
9	12559	General Corporate	Total Dir Labor	2,528,569	544,907	1,308,534	675,128
10	12587	Capacity Market Development	Alloc-Fixed	64,065	-	-	64,065
11	12618	GC - Employment Matters	Total Dir Labor	240,001	51,720	124,200	64,080
12	12619	Compliance	Alloc-Fixed	578,974	231,590	231,590	115,795
13	12622	Open Access Transmission Tariff	Alloc-Fixed	192,194	192,194	-	-
14	12631	GC - FERC Order 1000 (Legal Only)	Alloc-Fixed	448,452	-	-	448,452
15	12632	GC - FERC Order No. 2222	Alloc-Fixed	42,132	-	21,066	21,066
16	14806	Employee Development	Alloc-Fixed	94,286	52,376	18,225	23,685
17	14807	NERC RSAW Update and Audit Prep	Alloc-Fixed	834,519	417,259	-	417,259
18	14809	ROC - Tariff Compliance	Alloc-Fixed	405,413	121,624	243,248	40,541
19	14812	ROC - NPCC MP Referral	Alloc-Fixed	89,228	35,691	35,691	17,846
20	14816	Support NE Compliance Groups	Total Dir Labor	98,826	21,297	51,143	26,387
21	22704	Record Retention Services	Alloc-Fixed	127,611	42,495	42,495	42,622
22	22705	Corporate Scorecard	Alloc-Fixed	64,463	21,466	21,466	21,531
23	22706	Document Management Services	Alloc-Fixed	89,228	35,691	26,768	26,768
24	22709	ERM Management	Total Dir Labor	35,965	7,750	18,612	9,603
25	22710	Employee Development	Total Dir Labor	6,263	1,350	3,241	1,672
26	22721	Corp Strategic Risk	Total Dir Labor	1,104,083	237,930	571,363	294,790
27	25011	Corrective Action/Preventive Action	Alloc-Fixed	31,213	10,394	10,394	10,425
28		Total		12,187,945	2,278,100	6,569,159	3,340,686
29							
30		<u>External Affairs & Communications</u>					
31	12588	GC- Web Content Management	Total Dir Labor	752,194	162,098	389,261	200,836
32	12663	Public Information	Total Dir Labor	2,639,358	568,782	1,365,868	704,709
33	12669	Government Affairs	Total Dir Labor	3,022,392	651,325	1,564,088	806,979
		Total		6,413,944	1,382,205	3,319,216	1,712,523
34							
35		<u>Internal Audit</u>					
36	15001	Indirect Management Duties	Total Dir Labor	200,261	43,156	103,635	53,470
37	15002	Personnel Management	Total Dir Labor	52,698	11,357	27,271	14,070
38	15003	Budget & Forecasting	Total Dir Labor	35,132	7,571	18,181	9,380
39	15005	Audit & Finance Committee	Total Dir Labor	70,265	15,142	36,362	18,761
40	15006	Internal Audit Business Process Update	Total Dir Labor	17,566	3,786	9,090	4,690
41	15007	Annual Audit Work Plan	Total Dir Labor	579,054	124,786	299,661	154,608
42	15014	GRC Tool Admin and Development	Total Dir Labor	80,763	17,404	41,795	21,564
43	15021	Performance Measurements	Total Dir Labor	52,698	11,357	27,271	14,070
44	15022	Vendor Contracts	Total Dir Labor	17,566	3,786	9,090	4,690
45	15029	Audit - Payroll	Total Dir Labor	35,132	7,571	18,181	9,380
46	15033	Audit - Ethics Point Complaint	Total Dir Labor	17,566	3,786	9,090	4,690
47	15085	Audit - Information Technology	Total Dir Labor	952,073	205,172	492,698	254,203
48	15117	Audit - PMO Process and Procedures	Total Dir Labor	52,698	11,357	27,271	14,070
49	15161	External Audit- Pension Audit	Total Dir Labor	105,978	22,838	54,844	28,296
50	15162	External Audit- Financial Audit	Total Dir Labor	210,160	45,289	108,758	56,113
51	15166	External Audit -Pricing Module Certification	Alloc-Fixed	32,366	-	32,366	-
52	15176	External Audit - ISO Internet Vulnerability Assessment	Total Dir Labor	17,760	3,827	9,191	4,742
53	25702	External Audit - SSAE 18 Direct Management	Alloc-Fixed	785,006	-	785,006	-
54	28005	Fraud, Waste & Abuse Program	Total Dir Labor	84,738	18,261	43,852	22,625
55	28007	Contractor/Consultant Review	Total Dir Labor	25,576	5,512	13,236	6,829
56	28097	Audit - Power System Reliability	Alloc-Fixed	511,523	409,218	25,576	76,728
57		Total		3,936,580	971,174	2,192,425	772,981
58							
59		<u>System Operations & Market Administration</u>					
60	14405	Indirect Supervision/Clerical Support	SOA Labor	609,223	210,426	282,802	115,996
61	14408	National Committee Support	SOA Labor	389,873	134,662	180,979	74,232
62	19101	NEPOOL Committee Support	MOA Labor	266,895	-	186,827	80,069
63		Total		1,265,992	345,088	650,607	270,297

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Line No.	Activity Code		Allocation Factor (1)	Self-Funding Tariff			
	No.	Description		Total (2)	Schedule 1	Schedule 2	Schedule 3
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
1		<u>Operations</u>					
2	14001	Generation Dispatch	Alloc-Fixed	4,432,479	-	3,723,282	709,197
3	14002	Transmission Operations	Alloc-Fixed	2,532,845	2,026,276	126,642	379,927
3	14301	TSO - Contract Administration and Scheduling	Alloc-Fixed	637,065	63,707	445,946	127,413
4	14304	Advanced Scheduling and Forecasting	Alloc-Fixed	2,563,675	128,184	2,025,303	410,188
5	14562	Ops - Regional Committee Support	OPS Labor	30,962	8,657	17,141	5,164
6	14563	National Committee Support	OPS Labor	40,808	11,410	22,591	6,807
7	14565	Employee Development	OPS Labor	1,812	506	1,003	302
8	14578	Ops - OPTI External Training Meetings	Total Dir Labor	7,960	1,715	4,119	2,125
9	14585	Ops - Operations Procedure Support	Total Dir Labor	160,161	34,515	82,884	42,763
10		Total		10,407,766	2,274,970	6,448,910	1,683,886
11							
12		<u>Operational Performance Trng and Integration</u>					
13	14402	Operations Training	Alloc-Fixed	1,939,235	775,694	775,694	387,847
14	14462	OSS - General Systems Operations Support	TSO Labor	658,081	213,021	314,628	130,432
15	14564	Indirect Supervision/Clerical Support	OPS Labor	2,633,775	736,403	1,458,058	439,314
16	14574	OPTI Continuing Training	Alloc-Fixed	1,452,553	581,021	581,021	290,511
17	14575	Ops - OPTI System Operator Initial Training	Alloc-Fixed	7,708	3,083	3,083	1,542
18	14581	Ops - Application Testing and Development	Total Dir Labor	1,561,512	336,506	808,083	416,924
19	14587	Ops - Other Internal Support Meetings	Total Dir Labor	969,240	208,871	501,582	258,787
20	14591	Ops - OAI Pre-Project Activities	Total Dir Labor	855,505	184,361	442,724	228,420
21		Total		10,077,607	3,038,961	4,884,872	2,153,775
22							
23		<u>Operations Support Services</u>					
24	14451	TSO - NEPOOL Committee Support	TSO Labor	4,360	1,411	2,085	864
25	14453	National Committee Support	TSO Labor	9,144	2,960	4,372	1,812
26	14454	Indirect Supervision/Clerical Support	TSO Labor	1,397,363	452,326	668,079	276,957
27	14468	OSS - Root Cause/Event Analysis	TSO Labor	2,580	-	-	2,580
28	14474	OSS-Restoration Work	TSO Labor	13,715	12,344	-	1,372
29	14756	OSS - Human Performance Improvement Program	Alloc-Fixed	6,834	-	-	6,834
30	18361	Transmission Studies, Operations, OASIS Support	Alloc-Fixed	3,404,722	2,723,778	170,236	510,708
31	18381	Transmission Outage Application - Short Term	Alloc-Fixed	2,050,406	1,640,324	102,520	307,561
32	18382	Transmission Outage Application - Long Term	Alloc-Fixed	1,459,012	-	-	1,459,012
33	18383	OS - TARA Studies and Analysis	Alloc-Fixed	1,150	575	288	288
34		Total		8,349,285	4,833,718	947,579	2,567,987
35							
36		<u>Market Monitoring</u>					
37	16101	Market Power Monitoring and Mitigation	Alloc-Fixed	6,805,218	-	4,763,652	2,041,565
38	16102	Regulatory Activities	Alloc-Fixed	7,169	-	5,018	2,151
39		Total		6,812,386	-	4,768,670	2,043,716
40							
41		<u>Market Administration & Auctions</u>					
42	21901	Day Ahead Price Monitoring	Alloc-Fixed	462,457	-	462,457	-
43	21902	Real Time Price Verification	Alloc-Fixed	462,457	-	462,457	-
44	21907	Indirect Supervision/Clerical Support	MA Labor	1,063,800	-	1,030,184	33,616
45	21908	Employee Development	MA Labor	247,435	-	239,616	7,819
46	21917	Real Time Price Finalization	Alloc-Fixed	247,435	-	247,435	-
47	21915	FTR/Auction Administration	Alloc-Fixed	494,870	247,435	247,435	-
48	21951	FCM Annual Reconfiguration Auction Administration	Alloc-Fixed	64,826	-	-	64,826
49		Total		3,043,280	247,435	2,689,584	106,261
50							
51		<u>Market Analysis & Settlements</u>					
52	1701	Billing Statements - Energy	Alloc-Fixed	241,453	-	241,453	-
53	1702	Billing Statements - Transmission	Alloc-Fixed	272,004	272,004	-	-
54	1713	Billing Statements - ISO Tariff	Total Dir Labor	32,851	7,079	17,000	8,771
55	1723	Day-Ahead Anc Serv Sett	Alloc-Fixed	32,851	-	-	32,851
56	2048	FCM	Alloc-Fixed	351,502	-	-	351,502
57	2049	Product Testing	Alloc-Fixed	12,483	-	9,987	2,497
58	2051	Legal Support	Alloc-Fixed	16,425	-	8,213	8,213
59	2054	MAS -Markets Developmnt Sup	Alloc-Fixed	41,063	-	20,532	20,532
60	2005	Customer Service	STLM Labor	32,851	4,859	16,002	11,991
61	2007	Admin support - NEPOOL Committees	STLM Labor	4,271	632	2,080	1,559
62	2009	Indirect Supervision/Clerical Support	STLM Labor	1,072,247	158,585	522,291	391,370
63	2010	Employee Development	STLM Labor	275,584	40,759	134,237	100,588
64	2013	FTR Administration	Alloc-Fixed	48,948	-	48,948	-
65	2014	Billing Statements - NCPC	Alloc-Fixed	431,658	-	215,829	215,829
66	2020	Billing Disputes	Total Dir Labor	16,425	3,540	8,500	4,386
67	2021	Analysis & Reporting	Total Dir Labor	746,479	160,866	386,303	199,310
68	2024	ASM Regulation	Alloc-Fixed	46,319	-	-	46,319
69	2025	ASM Locational Forward Reserve	Alloc-Fixed	90,011	-	-	90,011
70	2026	Batch Processing	Total Dir Labor	51,697	11,141	26,753	13,803
71	2032	Billing	STLM Labor	71,615	10,592	34,883	26,139
72	2033	Market Analysis	Alloc-Fixed	96,777	-	96,777	-
73	2000037	Special Projects	STLM Labor	65,701	9,717	32,003	23,981
74	2000096	Training Development	Total Dir Labor	30,049	6,476	15,551	8,023
75		Total		4,081,263	686,249	1,837,340	1,557,674

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Line No.	Activity Code		Allocation Factor (1)	Self-Funding Tariff			
	No.	Description		Total (2)	Schedule 1	Schedule 2	Schedule 3
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
1		<u>Market Operations Support Services</u>					
2	3000	Hourly Settlements Support	Alloc-Fixed	255,809	-	127,905	127,905
3	3002	Monthly Settlements Support	Alloc-Fixed	300,253	150,126	-	150,126
4	3006	Customer Service	Alloc-Fixed	224,534	-	224,534	-
5	3008	Admin Support	Alloc-Fixed	598,363	-	598,363	-
6	3010	Employee Development	Alloc-Fixed	76,975	-	76,975	-
7	3017	Project MAS (Market Analysis & Settlements)	Alloc-Fixed	197,389	49,347	49,347	98,695
8		Total		1,653,323	199,474	1,077,124	376,726
9							
10		<u>Participant Support & Solutions</u>					
11	16001	Participant/membership support	Alloc-Fixed	2,660	-	1,330	1,330
12	16006	Call Support (Ask ISO)	Alloc-Fixed	1,721,800	447,668	1,136,388	137,744
13	16419	Asset Registration Implemented	Alloc-Fixed	494,870	-	494,870	-
14	16422	Claimed Capability Audits	Alloc-Fixed	677,479	-	677,479	-
15	16432	New Generation Coordination and Registration	Alloc-Fixed	494,870	-	494,870	-
16	16434	QMS/CAPA Process and Procedure Updates	Total Dir Labor	494,870	106,644	256,095	132,130
17		Total		3,886,549	554,313	3,061,032	271,204
18							
19		<u>Participant Training Services</u>					
20	16021	Training Development	Alloc-Fixed	1,631,122	-	815,561	815,561
21	16436	Mkt Trng/Cus Serv Indirect Supervision	Alloc-Fixed	356,178	-	356,178	-
22		Total		1,987,300	-	1,171,739	815,561
23							
24		<u>Planning Services</u>					
25	17101	Analysis	Alloc-Fixed	660,290	-	462,203	198,087
26	17131	Calculate Objective Capability	Alloc-Fixed	851,953	-	-	851,953
27	17331	NEPOOL Committee Support	Alloc-Fixed	5,985	651	302	5,033
28	17403	TCA Application Review	Alloc-Fixed	166,177	-	-	166,177
29	17409	Environmental/Emissions Supp	Alloc-Fixed	114,936	-	-	114,936
30	17410	EMS STLF Forecasting Support	Alloc-Fixed	38,312	28,734	9,578	-
31	17503	FCA - New Resource Qualification Support	Alloc-Fixed	389,376	-	-	389,376
32	17504	FCA - Perform Transmission / Topology Assessments	Alloc-Fixed	56,713	-	-	56,713
33	17508	FCA - Annual Reconfiguration Auction Support/Reliability Reviews	Alloc-Fixed	741,797	-	-	741,797
34	18101	Develop Load Forecast	Alloc-Fixed	984,735	196,947	196,947	590,841
35	18121	Operations Forecast Support	Alloc-Fixed	344,809	68,962	68,962	206,885
36	18131	Other Load Forecasting Activities	Alloc-Fixed	90,393	18,079	18,079	54,236
37	18132	NEPOOL Administrative Support	Alloc-Fixed	5,622	1,396	997	3,230
38	18133	Solar Load Forecast Development	Alloc-Fixed	306,497	61,299	61,299	183,898
39	18134	Electrification Forecasts	Alloc-Fixed	229,872	45,974	45,974	137,923
40	18135	CELT Rep-Res Outage Analysis	Alloc-Fixed	229,872	-	-	229,872
41		Total		5,217,340	422,042	864,340	3,930,958
42							
43		<u>System Planning</u>					
44	11101	Voltage Task Force	Alloc-Fixed	1,150	1,150	-	-
45	18150	SP - Regional System Plan	Alloc-Fixed	191,560	143,670	47,890	-
46	18402	Transmission Planning/Economic Studies Initiative	Alloc-Fixed	1,712,723	-	856,361	856,361
47	18531	SP - Indirect Supervision/Clerical Support	Alloc-Fixed	149,969	37,237	26,589	86,142
48		Total		2,055,402	182,057	930,841	942,503
49							
50		<u>Transmission Planning</u>					
51	21660	Stability Case Building	Alloc-Fixed	85,069	-	-	85,069
52	14703	TR - New England Committee Support	Alloc-Fixed	15,642	8,689	3,024	3,929
53	14715	Non DOE Funded/Unallowable	Alloc-Fixed	181,755	-	-	181,755
54	18201	Transmission System Assessment	Alloc-Fixed	7,751,202	7,751,202	-	-
55	18301	NEPOOL Administrative Support - Schedule 1 Tariff	Alloc-Fixed	106,332	106,332	-	-
56	18333	General SIS/FS	Alloc-Fixed	1,556,265	1,556,265	-	-
57	18334	Indirect Supervision/Clerical Support	Alloc-Fixed	892,822	892,822	-	-
58	18335	Regulatory Activities - NPCC	Alloc-Fixed	404,981	404,981	-	-
59	18336	National Activities	Alloc-Fixed	328,033	328,033	-	-
60	18337	TR - Regulatory Activities	Alloc-Fixed	484,083	484,083	-	-
61	18346	OATT and Oper. Agreement Dev., Adm. and Support	Alloc-Fixed	255,207	255,207	-	-
62	18349	TR - Process CEII Requests	Alloc-Fixed	28,356	28,356	-	-
63	18351	Resource Integration	Alloc-Fixed	1,101,541	1,101,541	-	-
64	18352	Asset Condition Reviewer	Alloc-Fixed	2,484,002	2,484,002	-	-
65		Total		15,675,291	15,401,514	3,024	270,753
66							
67		<u>Program Management</u>					
68	801	Program Management - Administration	Total Dir Labor	1,183,017	254,940	612,211	315,865
69	1665	Product and Test Mgmt.	Total Dir Labor	1,044,174	225,019	540,360	278,794
70	25002	PMO Support	Total Dir Labor	195,783	58,735	68,524	68,524
71	25003	Emerging Work Initiatives	Total Dir Labor	182,730	39,378	94,563	48,789
72	26125	Real-time Market Clearing Engine Phase I	Alloc-Fixed	48,295	-	48,295	-
73	26133	Day Ahead Ancillary Services	Alloc-Fixed	40,717	-	12,215	28,502
74	26153	CAMS Tech Upgrade	Alloc-Fixed	54,289	-	43,431	10,858
75	26155	Enterprise Resource Planning System Replacement	Total Dir Labor	6,638	1,430	3,435	1,772
76	26161	Managing Transmission Line Ratings	Alloc-Fixed	19,841	19,841	-	-
77	26163	FERC Order 841	Alloc-Fixed	21,206	-	21,206	-
78	26172	New England Clean Energy Connect	Alloc-Fixed	6,614	6,614	-	-
79	26175	SMS App Upgrade Phase I	Alloc-Fixed	30,390	-	24,312	6,078
80	26176	Oracle Platform Replacement	Total Dir Labor	6,614	1,425	3,423	1,766
81	26187	Distributed Energy Resources (DER)	Total Dir Labor	47,234	10,179	24,444	12,612
82	26195	CAMS High Priority AMR Project	Total Dir Labor	19,473	4,197	10,077	5,199
83	26205	SMS App Upgrade Phase II	Alloc-Fixed	34,816	-	27,853	6,963
84		Total		2,941,832	621,759	1,534,350	785,723

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Line No.	Activity Code		Allocation Factor (1)	Self-Funding Tariff			
	No.	Description		Total (2)	Schedule 1	Schedule 2	Schedule 3
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
1		<u>Advanced Technology Solutions</u>					
2	21201	Advanced Technology Solutions	Total Dir Labor	7,408,226	1,596,473	3,833,757	1,977,996
3	21207	ATS - Capacity Auction Reforms	Alloc-Fixed	1,003,333	-	-	1,003,333
4		Total		8,411,559	1,596,473	3,833,757	2,981,329
5							
6		<u>Market Development & Settlements Admin.</u>					
7	16607	National Committee Support	Total Dir Labor	7,182	1,548	3,717	1,918
8	19104	Indirect Supervision/Clerical Support	MOA Labor	423,919	-	296,744	127,176
9	21001	Market Development	Alloc-Fixed	1,403,562	-	701,781	701,781
10	21002	Administration	Total Dir Labor	1,150,969	248,034	595,626	307,309
11	21003	Employee Development	Total Dir Labor	122,970	26,500	63,637	32,833
12	21007	Budget/Forecast Support	Total Dir Labor	222,638	47,978	115,215	59,444
13	21010	MD - Day-Ahead Reserve Market	Alloc-Fixed	1,071,712	-	1,018,127	53,586
14	22656	Energy, Reserve, and Regulation Markets	Alloc-Fixed	2,700,018	-	2,025,013	675,004
15	22657	Project: ORTP/CONE Updates	Alloc-Fixed	2,560,687	-	-	2,560,687
16	22662	Flexible Response Services	Alloc-Fixed	1,584,397	-	792,198	792,198
17	22664	Capacity Auction Reforms	Alloc-Fixed	4,083,636	-	-	4,083,636
18		Total		15,331,690	324,060	5,612,058	9,395,572
19							
20		<u>Participant Relations & Services</u>					
21	22602	NEPOOL Committee Meetings & Support	Alloc-Fixed	403,938	-	201,969	201,969
22	22607	NEPOOL Committee Administration	Total Dir Labor	1,484,751	319,964	768,359	396,429
23	22613	PR&S Indirect Supervision	Total Dir Labor	552,193	118,998	285,760	147,436
24	22614	PR&S Project Development	Total Dir Labor	863,701	186,128	446,966	230,608
25		Total		3,304,584	625,089	1,703,053	976,441
26							
27		<u>IT Management</u>					
28	6517	Employee Development - Hardware/Software	Total Dir Labor	12,893	2,778	6,672	3,442
29	6519	Indirect Supervision and Clerical Support	Total Dir Labor	6,918,942	1,491,032	3,580,552	1,847,357
30	6552	IT - Security	Total Dir Labor	395,565	85,244	204,705	105,616
31	6556	Budget Preparation, Tracking & Forecast	Total Dir Labor	244,157	52,616	126,351	65,190
32	6557	Information Technology Committee	Total Dir Labor	31,982	6,892	16,551	8,539
33	22505	Administrative	Alloc-Fixed	1,335,298	454,001	440,648	440,648
34	23006	Business Continuity Planning	Total Dir Labor	616,148	132,780	318,856	164,511
35		Total		9,554,984	2,225,344	4,694,336	2,635,305
36							
37		<u>IT Infrastructure Services</u>					
38	6511	Desktop Support - Software	Total Dir Labor	421,648	90,865	218,203	112,580
39	6512	Host Computer - Hardware	Alloc-Fixed	842,954	-	632,216	210,739
40	6513	Host Computer - Software	Alloc-Fixed	5,307,204	-	3,980,403	1,326,801
41	6514	Networking - Hardware	Total Dir Labor	1,145,518	246,859	592,805	305,853
42	6516	Communications	Total Dir Labor	372,669	80,310	192,856	99,502
43	6622	CIP & Systems Compliance	Total Dir Labor	2,797,104	602,776	1,447,501	746,827
44	6623	Asset Management	Total Dir Labor	1,289,769	277,945	667,456	344,368
45	6626	IT - Infrastructure Break-fix & Troubleshooting	Total Dir Labor	773,796	166,753	400,439	206,604
46	6627	IT - Infrastructure Support Request	Total Dir Labor	635,096	136,863	328,662	169,571
47	6629	IT - Infrastructure Refresh/Upgrade	Total Dir Labor	960,773	207,046	497,200	256,526
48	2000026	Hardware	Alloc-Fixed	674,623	67,462	404,774	202,387
49	2000027	Software	Alloc-Fixed	12,917,144	1,291,714	7,750,286	3,875,143
50	2000028	INFR & SVC DEL	Alloc-Fixed	11,381,731	1,138,173	6,829,039	3,414,519
51		Total		39,520,028	4,306,768	23,941,840	11,271,420
52							
53		<u>IT Cyber Security</u>					
54	6540	Security Compliance and Reporting	Total Dir Labor	4,202,343	905,605	2,174,713	1,122,026
55	6540D	Intrusion Monitoring and Response	Total Dir Labor	1,296,463	279,388	670,920	346,156
56	6541	Security SW Tools Program	Total Dir Labor	724,102	156,044	374,723	193,335
57	6547	Cyber Security Training	Total Dir Labor	1,221,605	263,256	632,180	326,168
58		Total		7,444,513	1,604,293	3,852,536	1,987,685

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Line No.	Activity Code		Allocation Factor (1)	Self-Funding Tariff			
	No.	Description		Total (2)	Schedule 1	Schedule 2	Schedule 3
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
1		<u>IT Architecture & Analytics</u>					
2	6571	DBA Support - MOPS	Total Dir Labor	3,629,226	782,098	1,878,124	969,003
3	6591	Data Architect - MOPS	Total Dir Labor	479,796	103,396	248,294	128,105
4	6594	IT Data Analyst	Total Dir Labor	850,024	183,180	439,888	226,957
5	6595	IT WEB Application Support	Total Dir Labor	1,513,117	326,077	783,038	404,002
6	6596	IT Data Governance	Total Dir Labor	650,691	140,224	336,732	173,734
7	6597	IT - BI IT Commitments	Total Dir Labor	558,066	120,263	288,799	149,004
8	6598	IT - Data Analytics Cloud App	Total Dir Labor	109,122	23,516	56,471	29,136
9	6599	IT - EOAA Analyst	Total Dir Labor	340,010	73,272	175,955	90,783
10	21706	Enterprise Software Support	Total Dir Labor	3,364,679	725,088	1,741,222	898,369
11	21801	Software Support - Settlements	Alloc-Fixed	1,061,576	-	849,261	212,315
12	21802	Software Support - Publishing	Alloc-Fixed	168,055	-	134,444	33,611
13	21803	Software Support - Finance	Alloc-Fixed	1,611,496	-	1,289,196	322,299
14	21804	Software Support - Mitigation	Alloc-Fixed	1,113,821	-	891,057	222,764
15	21805	Software Support - TSO	Total Dir Labor	520,739	112,219	269,483	139,037
16	21806	Software Support - Enterprise	Total Dir Labor	1,555,432	335,196	804,936	415,300
17	21807	Software Support - Planning	Alloc-Fixed	1,203,293	-	962,634	240,659
18	21808	Training Delivery to NON-IT	Alloc-Fixed	318,492	-	254,794	63,698
19	21811	Single Sign On Support	Alloc-Fixed	55,186	-	44,149	11,037
20	21812	GADS Support	Alloc-Fixed	209,597	-	167,677	41,919
21	21818	Discoverer Support	Total Dir Labor	116,562	25,119	60,321	31,122
22	21824	FCTS Support	Alloc-Fixed	601,289	-	-	601,289
23	21825	eTariff Support	Alloc-Fixed	108,496	-	86,797	21,699
24	21826	FERC Electronic Data Delivery Support	Alloc-Fixed	3,174	-	2,539	635
25	21830	Annual Software Maintenance for Enterprise Wide Software	Total Dir Labor	2,083,647	449,026	1,078,287	556,334
26		Total		22,225,584	3,398,674	12,844,097	5,982,812
27							
28		<u>IT Energy Management Systems</u>					
29	21600	Indirect Supervision and Administration	Total Dir Labor	169,555	36,539	87,745	45,271
30	21602	Applications Support	Total Dir Labor	458,502	98,807	237,275	122,420
31	21603	EMS Power System Applications Support	Total Dir Labor	867,933	187,040	449,155	231,738
32	21604	Dispatcher Training Simulatory Support	Alloc-Fixed	2,534,216	2,027,373	506,843	-
33	21605	DAM FTR/ARR Support	Alloc-Fixed	3,457,377	691,475	2,074,426	691,475
34	21606	Real-time Market Support	Alloc-Fixed	6,645,718	1,329,144	3,987,431	1,329,144
35	21607	Forecast Support	Alloc-Fixed	1,096,133	219,227	657,680	219,227
36		Total		15,229,435	4,589,605	8,000,555	2,639,275
37							
38		<u>IT Enterprise Applications Development</u>					
39	6518	Employee Development - Software	Total Dir Labor	49,339	10,632	25,533	13,173
40	21702	IT Corporate Application Support	Alloc-Fixed	1,084,894	-	867,915	216,979
41	21707	Application Analysis and Conceptual Design	Alloc-Fixed	745,844	-	596,676	149,169
42	21708	Application Design Evaluation and Selection	Alloc-Fixed	931,839	-	745,471	186,368
43	21709	Technology Evaluation and Selection	Alloc-Fixed	1,863,368	-	1,490,695	372,674
44	21710	Indirect Supervision and Administration	Alloc-Fixed	1,494,942	-	1,195,953	298,988
45	21711	EWR and CAPA Analysis	Alloc-Fixed	255,891	-	204,713	51,178
46	21712	Automated Testing	Total Dir Labor	450,967	97,183	233,375	120,408
47		Total		6,877,084	107,816	5,360,331	1,408,937
48							
49		<u>IT Power System Modeling Management</u>					
50	21650	Indirect Supervision and Administration	Total Dir Labor	441,322	95,105	228,384	117,833
51	21651	Power System Modeling	Alloc-Fixed	2,953,024	1,181,210	1,181,210	590,605
52	21652	System Application Support	Alloc-Fixed	67,979	27,192	27,192	13,596
53	21653	PSMM-TTSE Support	Alloc-Fixed	97,555	78,044	19,511	-
54	21654	NX9 Administration	Alloc-Fixed	172,115	68,846	68,846	34,423
55	21655	ICCP Support	Alloc-Fixed	1,483,233	593,293	593,293	296,647
56	21656	Transmission Project Management	Alloc-Fixed	26,455	21,164	5,291	-
57	21657	Model On Demand Admin	Alloc-Fixed	1,345,254	-	-	1,345,254
58	21658	PSMM- Model on Demand Case Requests	Alloc-Fixed	113,425	-	-	113,425
59	21659	Synchrophasor Applications	Alloc-Fixed	157,142	23,571	23,571	109,999
60	21661	MAS Software Dev and Support	Alloc-Fixed	128,127	-	-	128,127
61		Total		6,985,631	2,088,425	2,147,298	2,749,908
62							
63							
64		Total ISO		\$ 354,028,630	\$ 77,031,397	\$ 171,250,473	\$ 105,746,759

Exhibit 3

Draft 2027 Rate Components (1)

Tariff Schedule	Jan. 1, 2027
Schedule 1	
Network Load (per kW-hour)	\$0.00046
Schedule 2	
TU Bids (Virtual Inc/Dec)	
Submitted	\$0.00500
Cleared	\$0.06000
FTR Bids	
Submitted	\$4.21494
Cleared	\$6.73806
TU's	
Block 1 - 1st 12,500	\$0.93032
Block 2 - Next 27,000	\$0.84574
Block 3 - Over 39,500	\$0.76117
Volumetric	
Block 1 - 1st 250,000	\$0.61142
Block 2 - Next 1,250,000	\$0.55584
Block 3 - Over 1,500,000	\$0.50025
Schedule 3	
R-T NCP Load Obligation	\$0.37047
Export Rate	\$0.87000

(1) From Exh 3, KCR-7, Sch. 3

Updated ISO-NE 2027 Budget Presentation

[Click Here](#)

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State Agencies' Questions to ISO-NE Regarding Proposed 2027 Budget

1. Please provide an unlocked Excel workbook with formulae intact supporting the headcount projections in slide 26,¹ including:
 - a. Vacancy rate application
 - b. Layer-in timing for new hires
 - c. Burden rate components
 - d. Allocation of staff time to capital/internal development
 - e. Incentive compensation pool calculation

ISO-NE's Response:

The graph on Slide 26 is an illustrative projection based on observed trends and is subject to numerous variables, as noted on the slide. These variables include, but are not limited to, the resources interconnected to the grid, additional responsibilities assumed by ISO New England, evolving regulatory requirements, and other factors that may increase the complexity of ISO's operating environment. As a result, future staffing levels, as well as the composition of that workforce, could vary significantly depending on the challenges encountered or the opportunities realized. The nature of those challenges and opportunities, and the skills required to address them will likely continue to evolve alongside the New England electric grid.

Because of the illustrative nature of the slide, the additional data elements requested, including vacancy rates, hiring and layering assumptions, burden rates, allocations between operating and capital development/reimbursable studies, and incentive compensation, have not been provided. Moreover, incorporating such cost and compensation factors would not be appropriate for the illustrative purpose of this analysis.

2. Does ISO have any multi-year targets for stabilizing headcount growth? If so, please provide details.

ISO-NE's Response:

We do not project multi-year targets for headcount growth. Prior to adding new headcount, we assess whether we can repurpose existing positions to address new initiatives. We also strive to find efficiencies to accommodate additional work efforts within our existing staffing levels. Our headcount growth is aligned with our strategic and operating objectives to ensure that we continue to support the region's needs by delivering high quality services and providing increasing value for New England.

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3. Please provide a description of the needs met by the 14 incremental FTE for System Planning (slide 45) and 10 incremental FTE for AI and cybersecurity (slide 45).

ISO-NE's Response:

For the 14 incremental FTEs in System Planning:

The planned newly established Asset Condition Reviewer (AC Reviewer) function is forecasted to be staffed with seven FTEs. As discussed during the development of the function, the AC Reviewer team will provide oversight of Transmission Owner Asset Condition Reviewer projects through reviews of asset monitoring and evaluation practices, as well as targeted reviews of asset condition replacement projects. The team will also be responsible for ongoing monitoring, annual reporting, and other related reporting activities. The function will be led by a Director of Asset Condition Review, who will oversee the program. In addition, five engineering positions are planned for 2027 to provide transmission and substation design, engineering, and maintenance expertise. An additional FTE will be added to support administrative, project coordination, and program management activities.

Five FTEs are proposed to support implementation of the new Capacity Auction Reforms (CAR) capacity market design. Additional staffing is required to support the increased implementation cadence associated with conducting capacity auctions twice per year. These resources will be responsible for the calculation and issuance of generation, demand resource, and import marginal resource accreditation values, as well as the development and publication of resource adequacy analyses. Key activities will include determining summer and winter capacity requirements, developing load forecasts, and establishing demand curves necessary to support the reformed capacity market framework.

Two FTEs are proposed to support Interconnection Services. These positions will be responsible for performing interconnection studies for new resources, including all resource types with submitted Interconnection Requests and requests for services such as Surplus Interconnection Service. The positions will also support transmission service requests, including studies associated with the interconnection of large loads, such as data centers. Most of these generation interconnection and transmission service requests will be processed through Order No. 2023-compliant Cluster Studies, which are subject to strict tariff-defined timelines. Additional staffing is necessary to ensure timely completion of studies and compliance with applicable tariff requirements as interconnection activity continues to grow.

For the 10 incremental FTEs in Information & Cyber Security Services:

The majority of the requested IT full-time equivalents (FTEs) will be dedicated to the development and execution of a comprehensive Artificial Intelligence (AI) strategy

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for the ISO. As AI capabilities continue to evolve and become increasingly important to grid operations, market functions, and enterprise business processes, these resources are necessary to ensure the organization can responsibly and effectively leverage emerging technologies. Key responsibilities will include business engagement, identification and sharing of AI use cases and solutions across the enterprise, development of enterprise AI architectures and governance frameworks, establishment of risk management and compliance processes, and implementation of cybersecurity controls that align with industry best practices and regulatory expectations.

In addition, the staffing request supports an FTE for continued investment in Site Reliability Engineering (SRE) capabilities to enhance the resiliency, availability, and performance of the ISO's mission-critical systems. Expanding the SRE function will enable greater automation, proactive monitoring, incident prevention, and operational efficiency, helping to ensure the reliable delivery of services that are essential to grid operations and market participants as they continue to increase in complexity.

The remaining FTE is requested to strengthen the Energy Management System (EMS) support organization and address an emerging workforce sustainability risk. EMS support requires deep, highly specialized knowledge of real-time grid operations, system configuration, vendor platforms, cyber-secure system management, and regulatory compliance. Much of this expertise is developed through years of hands-on experience and cannot be rapidly replaced through external hiring. As experienced EMS personnel retire or transition out of the workforce, the ISO faces the risk of losing critical institutional knowledge necessary to support, maintain, and enhance systems that are essential to reliable grid operations. The additional position will allow the organization to overlap experienced and developing staff, enabling structured knowledge transfer, cross-training, and succession planning before anticipated departures occur. Without this investment, the ISO would have an increased reliance on a limited number of subject matter experts, creating operational continuity risks and reducing the organization's ability to respond to system issues, support ongoing modernization efforts, and maintain the specialized expertise required to operate and evolve the EMS environment. This position is intended to ensure that the ISO can sustain the technical capabilities required to reliably operate and support mission-critical EMS systems over the long term while reducing key-person dependency and preserving operational resilience.

Collectively, these Information & Cyber Security Service positions represent strategic investments in innovation, operational reliability, cybersecurity, and workforce sustainability, ensuring that the ISO remains well-positioned to meet future business, regulatory, and operational demands while maintaining the high levels of reliability and security expected by stakeholders.

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4. Please explain whether any existing FTEs will be reallocated to meet the staffing needs to address the 2027 ISO-NE Strategic Goals (slide 31) in lieu of incremental FTEs.

ISO-NE's Response:

Assessing talent needs is a standard practice that is integrated into the strategic, operating, and budget planning process. Each business unit evaluates its staffing requirements over a short term (two- to three-year) planning horizon and updates those projections annually as operating objectives become more clearly defined.

When requesting a new FTE, managers are required to first consider whether an existing position can be repurposed to meet the identified need. Business units work closely with Human Resources to determine whether a repurposed position, another vacant position, or an internal employee can be utilized before requesting the addition of a new position.

As noted on slide 43 of the August 7, 2026, Budget Presentation, the organization has repurposed 56 positions since 2018, including 8 positions in 2026, across a wide range of functional areas. While many of these actions generate cost avoidance that is not readily visible in the budget, a specific example of a measurable cost reduction in the 2027 budget was the repurposing of an existing vacant position to address a workforce safety and security need, resulting in a \$300,000 reduction in budgeted consulting expenses. This is reflected in the first bulleted line item on slide 34 (under "Efficiencies, Reductions, and Other Non-Recurring Costs") of the budget presentation.

5. Please detail the results of the job benchmarking study, and provide a description and an example of how the results were used to modify ISO-NE salaries.

ISO-NE's Response:

ISO-NE retained Mercer, an independent third-party compensation consultant, to conduct a multi-year, job-specific compensation benchmarking study to evaluate the competitiveness of ISO-NE salaries relative to applicable labor markets. Mercer performed a position-by-position analysis by comparing ISO-NE roles to substantially similar positions in relevant comparator markets, including energy companies, utilities, independent system operators, regional transmission organizations, energy consulting firms, and broader industry markets for roles not specific to the utility sector. ISO-NE used the study results to inform salary planning, compensation governance, and targeted salary adjustment decisions.

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6. Please explain the ~27% increase in the 2027 budget (compared to 2026) for Meetings and Related Expenses (slide 71)

ISO-NE's Response:

Please see the explanation provided for this on slide 74 of the August 7, 2026, budget presentation (3rd bullet down). Slides 72 through 75 provide explanations for all budget lines which are greater than a 5% or \$500,000 increase above the 2026 budget.

7. Please provide a detailed cost breakdown of Computer Services expenses for 2025 actual, 2026 budget, and 2027 budget, including cloud services, software licensing, AI initiatives, storage/compute costs, cybersecurity tools, vendor escalators, and any project-related cost drivers contributing to year-over-year changes (slide 71).

ISO-NE's Response:

The table below provides a breakdown of Computer Services costs as categorized by ISO-NE. Included within this breakdown are the Cloud Services (Cloud Computing) and Software Licenses costs referenced in this request.

The amounts in these categories include cybersecurity-related costs of approximately \$3.8 million in the 2027 Budget, \$3.7 million in the 2026 Budget, and \$2.5 million in 2025 Actuals. They also include storage and compute costs of \$2.9 million, \$2.6 million, and \$2.3 million, respectively; vendor escalator impacts of \$1.9 million, \$1.5 million, and \$1.3 million, respectively; and project-related costs of \$1.9 million, \$0.7 million, and \$1.0 million, respectively. In addition, the 2027 Budget includes approximately \$0.2 million of AI-related costs, while AI-related costs in 2026 and 2025 were minimal.

It should be noted that some overlap exists among these categories. For example, cybersecurity costs may include maintenance contracts and software licenses, and certain cost increases may reflect a combination of vendor escalators, additional licensing requirements, and/or new functionality. Accordingly, the amounts presented represent reasonable approximations of the requested cost drivers rather than mutually exclusive categories.

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	<u>2027 Budget</u>	<u>2026 Budget</u>	<u>2025 Actual</u>
Maintenance Contracts	\$25,627,771	\$ 24,395,111	\$ 19,901,996
Software as a Service (SaaS)	\$ 8,278,361	\$ 6,037,256	\$ 4,129,485
Software Licenses	\$ 4,043,676	\$ 3,238,961	\$ 2,819,755
Cloud Computing	\$ 2,636,326	\$ 1,984,592	\$ 1,337,327
Hardware (non-capital)	\$ 330,394	\$ 308,544	\$ 219,115
Computer Supplies	\$ 60,000	\$ 60,000	\$ 39,821
Total	\$40,976,528	\$ 36,024,464	\$ 28,447,499

8. How does the adoption of artificial intelligence tools or automation impact the 2027 budget, particularly in terms of information technology costs, total headcount, skill requirements and recruiting needs, and how does the ISO anticipate this impacting future budgets?

ISO-NE's Response:

The main impact to the 2027 budget is the FTEs discussed earlier. There will also be some incremental costs due to greater adoption of AI tools that are already reflected. For future budgets, it is difficult to project given the pace at which AI is evolving and how commercial offerings are changing. However, we anticipate greater Microsoft licensing costs for our next Enterprise Agreement due to AI features and, as the industry matures, the cost of AI provider services will increase significantly even if our adoption remains at the current rate, which is likely to increase. For certain areas such as cyber security, these increases will not be discretionary.

9. Please identify instances of expenses where ISO used a generic inflation adjustment rather than known and measurable change.

ISO-NE's Response:

Preparing budgets requires the use of estimates for certain expenditures. However, the ISO generally does not apply broad, generic inflation factors. Instead, we develop estimates for significant cost categories, where necessary or appropriate, based on specific information, historical trends, and known circumstances for each item.

Examples include:

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- **Medical Insurance:** The ISO works closely with its benefits broker to develop budget estimates using projected medical trend increases and the ISO's claims experience. Throughout the renewal process, the ISO and its broker negotiate with carriers to obtain the most favorable pricing. As part of our fiduciary responsibility, the ISO periodically issues a Request for Proposal (RFP) to ensure competitive pricing and benefit plan offerings that deliver value to employees and the organization.
- **Computer Services Licenses and Maintenance:** For licenses and maintenance agreements expected to be renewed in 2027 where a current contracted amount is not available, the ISO applies an inflationary estimate based on recent historical experience. These estimates are used for budgeting purposes only, and the ISO actively negotiates contract renewals to secure the most favorable pricing available.
- **Interest Expense on Variable-Rate Debt:** The ISO obtains forecasted interest rate information from its banking partners, including estimates of the Secured Overnight Financing Rate (SOFR), to develop interest expense projections.

These examples illustrate how estimates, including projected cost increases where appropriate, are used to develop the annual budget. When actual costs exceed budgeted amounts, the ISO may utilize contingency funding or offset the variance through underspending in other areas. Conversely, when actual costs are lower than budgeted, the excess funds are returned to the contingency fund balance.

ISO New England has never exceeded its approved budget. Any budget underspending, together with the results of tariff collections, is flowed back through future rates in accordance with the ISO True-Up Mechanism established under the tariff. The ISO True-Up Mechanism is described on Slide 76 of the August 7, 2026, Budget Presentation, and the final 2025 results to be reflected in 2027 rates are presented on Slides 76 and 77.

10. Please identify the metrics considered for the Annual Performance Initiative (API) plan.

ISO-NE's Response:

ISO New England's incentive compensation program is designed to align incentive compensation with employee contributions to organizational success through a combination of **corporate and individual performance measures**. The Annual Performance Incentive (API) plan provides for non-fixed compensation and is intended to recognize employees' annual contributions to ISO-NE's business results.

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Corporate performance is evaluated using metrics aligned with ISO-NE's Strategic Goals. These metrics include multiple weighted factors that are objectively measured. The ISO Board of Directors reviews and approves the performance metrics at the beginning of the performance period (i.e. the budget year) and conducts a final review of results, after review by ISO-NE's Internal Auditors, before incentive payouts are authorized.

Individual performance is assessed through a formal annual review conducted by each employee's manager. Evaluations are based on achievement of major job responsibilities, performance objectives, and other factors relevant to the employee's role and level of responsibility.

By incorporating both corporate and individual performance measures, the API plan ensures that incentive awards reflect not only the organization's overall success but also each employee's direct contribution to achieving ISO-NE's objectives.

11. Depreciation as shown on slide 50 has increased annually since 2023. Please identify the incremental assets over the time period that have driven this trend.

ISO-NE's Response:

Depreciation expense is driven by capital spending, with capital assets and projects beginning to be depreciated once they are placed into service. Similar to the depreciation trend shown on Slide 50, the capital expenditure trend on Slide 62 reflects the Company's investment activity, although the relationship is not one-to-one due to the timing of projects being placed into service, as well as the retirement of older assets and assets becoming fully depreciated.

The Company discusses capital project priorities and specific projects through its annual budget process, with updates provided in quarterly capital budget filings submitted to FERC. Key projects that contributed to the depreciation trends in each year, as reflected on Slide 50, include:

- **2023** – Security Information and Event Management Log Monitoring Replacement; New Security Operations Center; Amazon Web Services Cloud Foundation; E-mail List Server Technology Refresh; Privileged Account Management Security Enhancements; Forward Capacity Tracking System Infrastructure Conversion Part III; and the Forward Capacity Market Cost Allocation & Accelerated Billing
- **2024** – nGEM Software Development Part II; nGEM Market Clearing Engine (Day-Ahead); Operating System Server Upgrade Part I
- **2025** – CIP Electronic Security Perimeter Redesign Phase II; Day-Ahead

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Ancillary Services Improvements and Day-Ahead Ancillary Services
Benchmark Levels

- **2026** – nGEM Real-Time Market Clearing Engine*, Enterprise Resource Planning System Replacement, CIP Electronic Security Perimeter Redesign Phase II, and FERC Order 841
- **2027** - Managing Transmission Line Ratings, nGEM Real-Time Market Clearing Engine*, and Distributed Energy Resources – Order 2222

*Note – The nGEM Real-Time Market Clearing Engine, with a mid-2026 go-live in-service date will have an incremental impact on Depreciation Expense for both 2026 and 2027.

12. Please explain the derivation of the \$7.5m budget impact for “Non-Project Capital Expenditures” shown on slides 64; 150-151.

ISO-NE’s Response:

For *Non-Project Capital Hardware* the Information and Cyber Security Services organization maintains an up-to-date inventory of hardware and software assets identified as candidates for replacement within the next year, including estimated replacement costs. This inventory serves as a key input to the annual budget estimation process. In addition, ISO New England is required to maintain certain NERC Critical Infrastructure Protection (CIP) related systems and assets within its controlled on-premises environment. As a result, a significant portion of our infrastructure cannot be migrated to cloud-based solutions and must continue to be maintained, refreshed, and periodically replaced throughout its lifecycle. The associated hardware, maintenance, and technology refresh costs have continued to increase due to escalating equipment prices, vendor support costs, and cybersecurity requirements.

For capital *Change Requests* the forecasted budget is developed by reviewing outstanding improvement requests, prioritizing them based on business needs, and estimating the resources required to successfully deliver the work. These requests provide flexibility to address smaller-scale business and technology improvements that arise through the normal course of operations and are not included within larger project budgets.

For *Building Improvements, Machinery & Equipment, and Furniture and Fixtures* the Facilities & Security group maintains a list of items requiring potential repair or replacement, along with estimated costs, to support annual budget planning. The 2027 budget includes funding to replace two elevators in the South Building at the Holyoke campus. In addition, the modest increase in non-project capital expenditures includes information technology investments necessary to support the new building, including technology infrastructure, communications, and related

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systems required to ensure continued reliable operations and occupancy readiness.

13. Please explain the derivation of the \$4.1m budget impact for “Other Emerging Work” shown on slides 65; 150.

ISO-NE’s Response:

Other Emerging Work is an estimate included in the annual capital budget. The dynamic nature of our business and the complexity of the systems that we operate requires ISO to be prepared to evaluate, prioritize, and implement capital projects (often on short notice) that may be unforeseen or in a very early conceptual stage at the time of the annual budgeting.

ISO New England closely monitors our overall capital spending and has never exceeded our approved annual capital budget. Ultimately, any unused capital spending will result in lower depreciation expense that flows through impacting billing rates.

14. Please identify whether the 2027 budget includes any expenditures, staffing, or initiatives intended to incorporate environmental justice considerations into ISO-NE’s planning, analysis, or stakeholder-engagement activities. For each such item, please provide a description and the associated budget amount. If no specific budget item is identified, please explain whether and how these considerations informed development of the 2027 budget.

ISO-NE’s Response:

We believe our current approach and funding meets the needs at this time. The 2027 budget continues funding a position for a policy advisor for environmental and community affairs within the External Affairs department, which serves as a liaison between ISO New England and state government agencies, the Consumer Liaison Group, and community members and organizations, on policy matters including environmental justice. This policy advisor has coordinated the ISO’s engagement with personnel in New England state agencies responsible for public engagement on environmental justice; engaged ISO employees internally on environmental justice matters; translated and recorded ISO content for Spanish-speaking audiences; provided input to the stakeholder engagement components of the longer-term transmission planning RFP; arranged virtual meetings with national, regional, state and local environmental organizations; hosted environmental and community organizations for meetings and tours of the ISO; engaged community planning agencies and local governments on the intersection of regional and local planning for energy infrastructure; and actively monitors municipal and community engagement on data centers as inputs to the ISO. In

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addition to these actions, the system planning process includes certain related work efforts, such as tracking emissions from the region's existing generation fleet and considering environmental impact and community engagement plans when conducting competitive procurements. The budget is developed based on the resources needed to fulfill the ISO's core responsibilities and support the ISO's work plan, which is informed by input from the states and stakeholders. This phase of the budget process provides a further opportunity for the states to provide input to the budget for 2027.

PURA staff reviewed ISO-NE's presentation materials with the assistance of a generative artificial intelligence, Microsoft Copilot, in adherence with the State of Connecticut's AI Responsible Use Framework.² PURA staff provided an offline copy of the publicly accessible slide deck presented at the August 7th external stakeholder meeting and prompted Microsoft Copilot to convert pictures of tables to static Excel files and identify any instances where cost increases were unsubstantiated, with page references. All questions included herein were drafted by PURA staff. All references provided by Microsoft Copilot were verified by PURA staff to be valid and accurate.

² Available at: <https://portal.ct.gov/OPM/Fin-General/Policies/-/media/D13D6F704FA3408998F20E67EBDA8AAB.ashx>.

Follow up responses to ISO New England 2027 Proposed Budget questions from the August 7, 2026 NEPOOL Budget & Finance Subcommittee Meeting

- Questions on **the funding to support Tariff-required Net CONE (Cost of New Entry) recalculation activities** (noted on slide 40, and elsewhere, in the presentation) related to the timing, level of costs, and what impact Capacity Auction Reforms (move to prompt seasonal market) will have on this work
 - Commencing work in 2027 is necessary to support the 2030-2031 Capacity Commitment Period, with the stakeholder process occurring in 2028 and a FERC filing anticipated in Q4 2028 or Q1 2029. This schedule, which is in line with past Net CONE recalculation cycles, will allow sufficient time to update the capacity market demand curve and related tariff-required parameters.
 - The potential impacts of transitioning to a prompt/seasonal capacity market are still being evaluated. If that assessment results in a material change in scope, the updated information will be presented to stakeholders in 2027.
 - Estimated costs were developed based on a combination of previous Net CONE updates conducted by ISO-NE and a review of other ISOs/RTOs' recent CONE and Net CONE project costs. However, work on the project has not yet commenced, and no vendor selection process has been initiated.
- Question on the ISO role related to **Environmental & Community Affairs policy advising**, as noted on slide 26 of the presentation
 - During the 2024 budget development process certain New England State's officials requested that ISO New England create an Environmental Justice position. After discussions and consultation with the state officials, that requested the position, the ISO added a *Policy Advisor, Environmental & Community Affairs* position.

Attached is the formal letter sent to the ISO requesting the new position and here is a link to a video, with the current position holder Ruben Flores-Marzan, briefly providing information about his position [ISO Minute: Meet ISO New England's First Policy Advisor for Environmental and Community Affairs](#)

August 1, 2023

Robert Ludlow
Chief Financial Officer
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040

Re: Request to Create an Executive-Level Environmental Justice Position at ISO New England (ISO-NE)

Dear Mr. Ludlow:

Thank you for your June 23, 2023 briefing to the New England states on ISO-NE's preliminary operating and capital budgets for 2024 and 2025.¹ We appreciate the opportunity to provide feedback at this early stage of the budget process. We also appreciate ISO-NE's focus on ensuring that it has the necessary personnel to support New England's clean energy transition. We understand ISO-NE's challenge in attracting and retaining a qualified and skilled workforce, including those with technical expertise in areas that are in high demand. While we are still reviewing the budget materials and are awaiting additional materials later this summer, we are interested in supporting investments to achieve a clean regional power grid that is reliable, affordable, and equitable.

At the June 23 briefing, a state official advocated for ISO-NE to include in its budget the creation of a dedicated, executive-level position focusing on energy and environmental justice (EJ) to align ISO-NE's organizational objectives and operations with a just and equitable clean energy transition. You asked for more information and definition regarding the proposed position. This communication responds to that request.

Below is a preliminary, and non-exhaustive, list of the responsibilities and functions that the executive-level EJ position could carry out. At the highest level, this position would provide an EJ and equity lens to ISO-NE's management and staff, inform the development of ISO-NE initiatives, rules, and operations, and engage EJ communities and stakeholders.

Responsibilities for this position could include, but would not be limited to the following:

- Advise the ISO-NE Board of Directors and senior management on (i) the relationship and intersection of ISO-NE market rules, transmission planning, and operations on EJ communities, as defined by each state, and state and federal laws and policies related to EJ, and (ii) procedures, rule changes, and other actions needed to integrate EJ priorities into ISO-NE's day-to-day work and corporate strategies.
- Establish and foster relationships with EJ communities and stakeholders and serve as an external resource on EJ, including establishing processes for engaging with EJ communities, ensuring that ISO-NE practices consider the perspectives of EJ

¹ ISO New England, *2024 and 2025 Preliminary Operating and Capital Budgets: Briefing for New England States*, June 23, 2023.

communities, and making technical information accessible and understandable to broader audiences.

- Coordinate across ISO-NE internal teams and working groups on understanding EJ principles and incorporating EJ principles into ISO-NE programs, initiatives, and the development of rules and practices.
- Develop and facilitate internal trainings and workshops on meaningful engagement of EJ communities.
- Coordinate with regional partners on cross-state collaboration and implementation of EJ principles.
- Develop tracking systems and mechanisms to ensure accountability in incorporating energy and EJ principles into ISO-NE corporate strategies, programs, initiatives, and development of rules and practices.
- Communicate with the public about ISO-NE’s progress on integrating EJ principles into its strategies, programs, initiatives, rules, and practices.

As community engagement and responsibilities grow, this executive position could build out and manage additional team members providing EJ expertise to ISO-NE and enhancing community, government, and industry engagement. We welcome further discussion on the possible scope of responsibilities for the role and note that consultation with others, including and especially EJ communities and stakeholders, is critical in informing the duties and functions of this position.

* * *

There is a gap in ISO-NE’s budget proposal and its current management team without a position reflecting EJ experience and the skillset described above. ISO-NE’s budget presentation accurately states: “Urgency around the transition to clean energy will increase, leading to a greater focus on ISO actions and the need for more and different types of public and regulatory engagement.”² A successful clean energy transition cannot happen without community engagement and a meaningful role for EJ communities in helping to shape decisions that impact wholesale power and transmission rates and affect how the benefits and burdens of our electric system are apportioned. Creating this position would serve as a critical bridge from ISO-NE to the communities it serves.

ISO-NE’s regulator, the Federal Energy Regulatory Commission (FERC), has emphasized the need to prioritize environmental justice. For example, Chairman Willie Phillips has led efforts at FERC to hire the first Senior Counsel for Environmental Justice and Equity and, earlier this year, hosted FERC’s first Roundtable on Environmental Justice and Equity in Infrastructure Permitting.³ Chairman Phillips recently testified to Congress that it is his “goal as Chairman to do all that we reasonably can to ensure that environmental justice communities affected by [FERC’s] decisions do not bear too great a share of the burdens or too small a share of the benefits that new energy infrastructure can provide.”⁴

² *Id.* at Slide 19.

³ Testimony of Chairman Willie Phillips, Federal Energy Regulatory Commission, Senate Energy and Natural Resources Committee, May 4, 2023, at 3.

⁴ *Id.*

We understand that if ISO-NE creates a dedicated EJ position, it may be the only independent system operator or regional transmission organization in the country that has established such a role. We encourage ISO-NE to be first in this critical area. Thank you for your consideration, and we look forward to continuing discussion on this and other budget priorities.

Sincerely,

/s/ Jason Marshall

Jason Marshall
Deputy Secretary for Federal and Regional
Energy Affairs
Massachusetts Executive Office of Energy and
Environmental Affairs

/s/ María Belén Power

María Belén Power
Undersecretary of Environmental Justice
and Equity
Massachusetts Executive Office of Energy
and Environmental Affairs

/s/ James M. Van Nostrand

James M. Van Nostrand
Chair
Massachusetts Department of Public Utilities

/s/ Staci Rubin

Staci Rubin
Commissioner
Massachusetts Department of Public
Utilities

/s/ Cecile M. Fraser

Cecile M. Fraser
Commissioner
Massachusetts Department of Public Utilities

/s/ June E. Tierney

June E. Tierney
Commissioner
Vermont Department of Public Service

/s/ Anthony Z. Roisman

Anthony Z. Roisman
Chair
Vermont Public Utility Commission

/s/ Margaret Cheney

Margaret Cheney
Commissioner
Vermont Public Utility Commission

/s/ Riley Allen

Riley Allen
Commissioner
Vermont Public Utility Commission

/s/ Christopher Kearns

Christopher Kearns
Acting Commissioner
State of Rhode Island Office of Energy
Resources

/s/ Katie Dykes

Katie Dykes
Commissioner
Connecticut Department of
Energy & Environmental Protection

/s/ Marissa Gillett

Marissa Gillett
Chair
Connecticut Public Utilities Regulatory
Authority

/s/ Phil Bartlett
Phil Bartlett
Chair
Maine Public Utilities Commission

/s/ Carolyn Gilbert
Carolyn Gilbert
Commissioner
Maine Public Utilities Commission

September 8, 2026

Cheryl LaFleur
Chair
Board of Directors
ISO New England
One Sullivan Road
Holyoke, MA 01040

RE: Comments on Proposed 2027 ISO New England Operating & Capital Budgets

Dear Chair LaFleur,

On behalf of the undersigned New England state agencies, we submit our comments regarding the ISO New England (ISO-NE) proposed 2027 Operating and Capital Budgets.

We reiterate our appreciation for ISO-NE's commitment to the budget review process that has been in place since 2013, and which offers the New England state agencies an opportunity to ask questions and provide input on the proposed budgets for ISO-NE. We strongly believe that budgetary review from the state agencies provides an important perspective and balance to the budgeting process, including by helping ensure that cost concerns are factored into the process. We stress, as we did in last year's comments, that ISO-NE's budgetary growth needs to be accompanied by heightened diligence by ISO-NE and those who oversee it to ensure that budgeted amounts are appropriate for the responsibilities involved and the work required, and that the amounts are efficiently and effectively spent.

In our comments on the 2025 proposed budget, we noted the lack of a proactive and ongoing assessment of transmission system costs and procedures, including the processes through which asset condition projects are identified, vetted, and priced. We therefore appreciate ISO-NE's extensive effort developing the Asset Condition Reviewer role and eagerly await its approval by FERC in the pending docket.

Regarding this year's proposal, we have five areas of feedback:

First, we recommend that in future budget cycles, ISO-NE make available the Excel workbooks used to produce the tables included in presentation slides. The current practice of sharing tabular data only via slides is not conducive to substantial financial analysis nor

Cheryl LaFleur
Chair
Board of Directors
ISO New England
September 8, 2026
Page 2

comparing budget versus actual expenditures year-over-year. If ISO-NE has concerns about confidential information in the budget workpapers, the undersigned state agencies would welcome completing non-disclosure agreements prior to receiving information, or other reasonable accommodations to address such concerns. When electric utilities submit rate case applications, PDF files are accompanied with Excel workbooks with formulae intact so PUC staff and other parties and intervenors can ask meaningful discovery questions. Given that ISO-NE's costs are also ultimately borne by New England electric ratepayers, ISO-NE should strive to provide a similar level of transparency during the budgeting process.

Second, we see value in ISO-NE articulating a vision or more specific need for incremental AI-related expenditures, particularly incremental FTEs. While we share in the belief that AI will be an important component in achieving ISO-NE's core mission, the Board should conduct a needs and capabilities assessment to determine how the use of AI can help achieve beneficial outcomes, weighing the costs of implementation with future productivity gains, expanded capacities, or the reduction of future incremental FTEs.

Third, we urge the Board to review the metrics used to calculate Annual Performance Incentive (API) compensation to ensure alignment with stakeholder interests, particularly those of end-use customers.

Fourth, we recommend a careful review of ISO-NE's budgeted Computer Services expenses. According to information provided by ISO-NE staff, the 2027 budgeted amount is 44% higher than 2025 actuals. Among the largest two expense items, maintenance contracts grow from \$19.9M to \$25.6M and SaaS costs grow from \$4.1M to \$8.2M. We would expect the steep increase in SaaS costs to be partially offset by an accompanying decrease in on-premise hosting costs, yet this does not appear to be included in the budget.

Fifth, we appreciate ISO-NE's ongoing efforts to engage with state agencies, community-based organizations, and other stakeholders on environmental justice and equity matters. We encourage ISO-NE to continue building on this work and, where appropriate, to strengthen consideration of environmental justice populations and burdened areas in relevant planning, analysis, and stakeholder engagement activities. We welcome continued dialogue with ISO-NE regarding how these efforts may be reflected in future work plans and budgets.

Cheryl LaFleur
Chair
Board of Directors
ISO New England
September 8, 2026
Page 3

Conclusion

While we view the proposed 2027 budget proposal to be appropriate given the increased amount and complexity of the tasks required of ISO-NE as the New England power system transitions to clean energy, we ask that the Board consider the above recommendations as it evaluates the proposed budget, and that it encourage ISO-NE staff to provide workpapers during future annual budget reviews so that stakeholders can conduct meaningful analyses of budget trends.

Respectfully submitted,

Connecticut Public Utilities Regulatory Authority	Massachusetts Department of Public Utilities
Thomas H. Wiehl, Chairman	Jeremy C. McDiarmid, Chair
David Arconti, Jr., Vice Chairman	Staci Rubin, Commissioner
Janice A. Beecher, Commissioner	Elizabeth A. Anderson, Commissioner
Holly H. Cheeseman, Commissioner	1 South Station, 3 rd Floor
Everett Smith, III, Commissioner	Boston, MA 02110
Ten Franklin Square	
New Britain, CT 06051	Vermont Public Utilities Commission
	Edward McNamara, Chair
Connecticut Office of Consumer Counsel	Margaret Cheney, Commissioner
Claire E. Coleman, Consumer Counsel	J. Riley Allen, Commissioner
Ten Franklin Square	112 State Street
New Britain, CT 06051	Montpelier, VT 05620



September 21, 2026

Via Electronic Mail

Thomas H. Wiehl, Chairman, Connecticut Public Utilities Regulatory Authority
David Arconti, Jr., Vice Chairman, Connecticut Public Utilities Regulatory Authority
Janice A. Beecher, Commissioner, Connecticut Public Utilities Regulatory Authority
Holly H. Cheeseman, Commissioner, Connecticut Public Utilities Regulatory Authority
Everett Smith, III, Commissioner, Connecticut Public Utilities Regulatory Authority
Claire E. Coleman, Consumer Counsel, Connecticut Office of Consumer Counsel
Jeremy C. McDiarmid, Chair, Massachusetts Department of Public Utilities
Staci Rubin, Commissioner, Massachusetts Department of Public Utilities
Elizabeth A. Anderson, Commissioner, Massachusetts Department of Public Utilities
Edward McNamara, Chair, Vermont Public Utilities Commission
Margaret Cheney, Commissioner, Vermont Public Utilities Commission
J. Riley Allen, Commissioner, Vermont Public Utilities Commission

Dear State Officials:

Thank you for your comments dated September 8, 2026, regarding the proposed 2027 ISO New England Operating and Capital Budgets. We are grateful for the continued engagement of the New England state agencies in the annual budget review process and value the perspectives provided through your review and feedback. We are also appreciative that you recognize the 2027 budget as appropriate given the increased amount and complexity of the tasks required of ISO New England.

The Board shares your view that rigorous scrutiny of ISO-NE's budget is essential, particularly as the region's power system undergoes significant transformation. We are committed to ensuring that expenditures remain aligned with ISO-NE's responsibilities, strategic priorities, and the interests of New England consumers and we recognize that heightened diligence by the Board is imperative during this time of growth.

We appreciate your acknowledgment of the efforts undertaken to establish the Asset Condition Reviewer role and we look forward to the outcome of the pending FERC proceeding and the benefits this initiative is expected to provide.

With respect to your specific recommendations:

Access to Budget Data

We recognize the value of providing budget information in a format that facilitates meaningful analysis. Although there are key differences between our budget process and the state utility rate cases to which you refer, in future budget cycles, we will supplement much of the information provided in the budget presentation with Excel workbooks.

Artificial Intelligence Investments

The Board agrees that investments in artificial intelligence and related technologies must be guided by clearly defined business objectives and demonstrated value. As ISO-NE continues to evaluate AI-related opportunities, we will require management to articulate the anticipated operational benefits, productivity improvements, and strategic objectives associated with such investments. Additionally, to strengthen oversight of AI-related spending, ISO-NE management has recently expanded the responsibilities of the analyst (the Cloud FinOps Analyst) who is responsible for maximizing the business value of cloud investments by partnering with finance, technology, and business teams to improve budgeting and forecasting. The role now also includes monitoring AI-related costs, identifying significant spending increases early, and pursuing opportunities to optimize or reduce expenditures. The Board is also in the process of establishing its governance of the Company's AI use.

Annual Performance Incentive Metrics

The Board of Directors and the Compensation and Human Resources Committee of the Board share oversight of the Company's Annual Performance Incentive program. Subject to eligibility criteria, employees may receive an annual award based on a formula that includes company performance, individual performance, annual base salary, and a grade-related salary percentage. Company performance is determined using goals that are set in advance by the Board. With reference to your comment, please be assured that the Board chooses goals that reflect the Company's mission and its responsibilities to states and stakeholders, including end users. These goals are measurable, and include various operational and performance metrics that the Board regularly reviews.

Computer Services Expenditures

The Board recognizes your observations regarding the increases in Computer Services, and this area has received significant attention during the Board's review process from the full Board and the Board's Audit and Finance Committee and Information Technology and Cyber Security Committee. As noted above, ISO-NE has recently hired a Cloud FinOps Analyst to provide greater financial oversight regarding cloud and AI related spending.

The increase in the Computer Services budget is driven by several factors, including, but not limited to, larger than typical inflationary increases. A number of new software as a service (SaaS) solutions are additive rather than replacements for existing services, including grid interconnection software, probabilistic analysis tools, and cybersecurity enhancements. In addition, as many systems are being reimplemented in the cloud there is little or no change to underlying software licensing costs. Instead, the transition shifts spending from capital-funded hardware investments to ongoing operating expenses. Finally, during ISO-NE's multi-year transition to cloud-based environments, costs are temporarily elevated because cloud and on-premises infrastructure must often operate in parallel until entire computing environments can be fully retired.

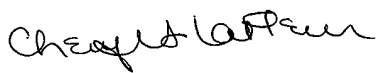
We appreciate your observations regarding Computer Services spending and agree that this is an area that warrants careful review and oversight. The Board will continue to scrutinize these investments to ensure they are justified by operational needs, cybersecurity requirements, system modernization efforts, and expected benefits.

Environmental Justice and Equity Engagement

We appreciate your recognition of ISO-NE's ongoing outreach and community engagement efforts as outlined in our 2027 Budget Question & Answer responses.¹ As we continue this work, we welcome ongoing dialogue with states, community-based organizations, and other stakeholders to understand if there are additional areas for growth and evolution.

The Board values the constructive partnership that has developed with the New England states through the budget review process. Your feedback contributes meaningfully to our evaluation of the proposed 2027 budget and to our broader oversight responsibilities. We will carefully consider the recommendations outlined in your letter as we complete our review of the proposed and future budgets. Thank you again for your engagement.

Sincerely,



Cheryl A. LaFleur
Chair, ISO New England Board of Directors

¹ https://www.iso-ne.com/static-assets/documents/100038/a07_bfs_2026_08_07_states_2027_budget_questions.pdf

New England States Committee on Electricity

2027 Budget Presentation

NEPOOL Budget & Finance Subcommittee

August 7, 2026

The logo for NESCOE (New England States Committee on Electricity) is displayed within a white circle. The text "NESCOE" is in a bold, orange, sans-serif font. The letter "O" is replaced by a stylized orange lightning bolt icon.

NESCOE

REVISED October 2026 PC

Change only to p. 12 to reflect final Network Load factor

Background: Budget Review

Term Sheet Provision: "... the annual review of its [NESCOE's] proposed budgets by at least the NEPOOL Participants Committee will be limited to considerations of accounting and reconciliation, so long as spending remains within the boundaries established by those frameworks..... NESCOE will develop an operating budget recommendation for each year in consultation with NEPOOL, the PTO Administrative Committee and ISO-NE within the boundaries of the then-approved five year budget framework ..."

- ✓ Proposed 2027 budget conforms to:
 - Boundaries of 5-year pro forma (2023-2027) reviewed by Budget & Finance
 - NESCOE commitment not to seek an increase over pro forma budget of more than 10% in any 1 year: 2027 proposed budget is less than 2027 5-year pro forma budget
- ✓ Following calendar year 2025, independent auditor concluded NESCOE books conform to generally accepted accounting principles

Background: Policy Priorities

Term Sheet Provision Governing Identification of Policy Priorities:

“Each year NESCOE will produce a ***Report to the New England Governors*** that will document its accomplishments from the preceding year and its projected policy priorities for the coming two years. This report will include a full accounting of spending by NESCOE during the preceding year and proposed budgets for each of the upcoming two years.”

Consistent with Term Sheet, 2025 *Report to the New England Governors*:

- ✓ Reviewed work in 2025
- ✓ Projected policy priorities
- ✓ Provided spending from prior year
- ✓ Projected budget information for upcoming two years

Projected Policy Priorities

- ✓ NESCOE provided to the Governors the **2025 Annual Report to New England Governors**
- ✓ Report simultaneously released to NEPOOL & ISO-NE & circulated to the Participants Committee
- ✓ NESCOE identified forward looking policy priorities at Section V, pages 15

Report in “Resource Center”

www.nescoe.com



Projected Policy Priorities

Looking ahead, affordability will be the lens through which regional decisions must be evaluated.

Transmission continues its strong presence in forward-looking priorities. This includes, but is not limited to:

- ✓ Asset Condition Project Review and Oversight
- ✓ Continue work with ISO-NE and stakeholders on evaluating the bids received in response to the region's first solicitation for longer-term transmission and continue discussions on ways to further enhance longer-term transmission planning.
- ✓ Procedures to ensure timely and effective consideration of advanced transmission technologies to get the most out of the existing system and new investments
- ✓ FERC's efforts to reform transmission planning through Order 1920, including state law-based transmission planning and cost allocation.

Wholesale Market Reforms. Continued engagement on capacity market reforms and understanding the market and consumer implications.

Large Load Growth. Work with ISO -NE, consumer advocates, and stakeholders to develop large load policies and approaches that balance economic opportunity against risks to consumers, protect local communities, and safeguard regional grid reliability, and participate meaningfully in any related FERC proceedings.

NESCOE Organization & Misc.

Employees

- ✓ Retain and attract diversity in academic training, skills; blend of private & public sector experience
- ✓ Steady state after retaining experienced staff member at reduced hours in 2025;

Office Space

- ✓ No office leases at this time; renting meeting space as needed

Other Organization Matters

Technical Consultants

Technical consultants assist NESCOE in the regular course of business in analyzing ISO-NE studies and data.

Continue work with technical consultants to conduct independent analysis to inform state officials' decisions on key issues, including, for example:

- ✓ Wilson Energy Economics
- ✓ M&L Energy Advisors
- ✓ MP Energy LLC
- ✓ RLC Engineering
- ✓ Stickney Brook Consulting
- ✓ GDS Associates
- ✓ Oxford Power Systems
- ✓ Apex Analytics

Legal Counsel

Litigation is not the primary means by which NESCOE seeks to accomplish its objectives & thus, greater resource and focus has historically, and thus far in 2026, been on technical consulting. Further, while NESCOE produces most legal pleadings and analysis internally, the frequency and type of litigation brought by others influences the extent to which NESCOE engages outside counsel.

- ✓ Primary FERC Counsel: Phyllis G. Kimmel Law Office PLLC

5-Year Pro Forma

Proposed 2027 budget conforms to 2027 budget in 5-year Pro Forma Framework

✓ 2027 Projected Budget in 5-Year Pro Forma:	\$3,194,896
✓ 2027 Proposed Budget:	\$2,978,711
✓ 2026 Budget, for reference:	\$2,731,108

The 2027 Proposed Budget reflects:

- ✓ Continued emphasis on technical consultants (vs. outside legal services)
- ✓ Sustained inflationary assumptions
- ✓ No office rent or utilities
- ✓ More travel for meetings

5-Year Pro Forma, for reference

NESCOE
PRO FORMA BUDGET 2023-2027*



Expense Category	Year 16 (2023)	Year 17 (2024)	Year 18 (2025)	Year 19 (2026)	Year 20 (2027)
Salaries and Wages					
Salaries	1,311,718	1,377,304	1,446,169	1,518,478	1,594,401
Payroll Taxes	131,172	137,731	144,617	151,848	159,440
Health and Other Benefits	110,098	115,603	121,383	127,452	133,825
Retirement \$401(k)	52,469	55,092	57,847	60,739	63,776
Total, Salaries and Wages	1,605,457	1,685,730	1,770,016	1,858,517	1,951,443
Direct Expenses - Consulting					
Technical Analysis	342,933	353,221	363,818	374,732	385,974
Legal (FERC)	342,933	353,221	363,818	374,732	385,974
Total, Direct Expenses, Consulting	685,866	706,442	727,635	749,464	771,948
General and Administrative					
Rent		12,000	12,360	12,731	13,113
Utilities		2,500	2,575	2,652	2,732
Office and Administrative Expenses	50,000	51,500	53,045	54,636	56,275
Professional Services	41,500	42,745	44,027	45,348	46,709
Travel/Lodging/Meetings	60,000	61,800	63,654	65,564	67,531
Total General and Administrative	151,500	170,545	175,661	180,931	186,359
Capital Expenditures & Contingencies					
Computer Equipment	8,666	8,926	9,194	9,470	9,754
Contingencies	244,682	252,022	259,583	267,371	275,392
Capital Expenditures & Contingencies	253,348	260,948	268,777	276,840	285,145
TOTAL EXPENSES**	2,696,171	2,823,665	2,942,090	3,065,753	3,194,896

*Projected 5% salaries and wages annual adjustment, and projected 3% annual adjustment on all other items. Line items and categories subject to increase greater than, or decrease from, amounts projected.

Any such changes will be subject to review, input, and recommendations by the NEPOOL Participants Committee (and/or its designees).

**At no time during this 5-year period will NESCOE seek a budget increase of more than 10% in any 1 year of more than 30% on a cumulative basis.

2027 Proposed Budget

	2027
Salaries and Wages	
Salaries	1,270,104
Payroll Taxes	127,010
Health and Other Benefits	165,000
Retirement §401(k)	<u>50,804</u>
Total, Salaries and Wages	<u>1,612,919</u>
Direct Expenses - Consulting	
Technical Analysis	575,000
Legal (FERC)	<u>225,000</u>
Total, Direct Expenses, Consulting	<u>800,000</u>
General and Administrative	
Rent	-
Utilities	-
Office and Administrative Expenses	60,000
Professional Services	70,000
Travel/Lodging/Meetings	<u>150,000</u>
Total General and Administrative	<u>280,000</u>
Capital Expend. & Contingencies	
Computer Equipment	15,000
Contingencies	<u>270,792</u>
Capital Expend. & Contingencies	<u>285,792</u>
TOTAL EXPENSES	<u>2,978,711</u>

2025 & 2026 Spending & Implications for 2027

Unspent funds in any year credited toward future year

2025 Total Spending: \$1,910,875*

2026 Spending to end of June: \$863,525

2026 Projected Year End: \$2,234,525*

*Cumulative prior years' true up, including 2024, was reflected in the 2026 revenue requirement and rates. The 2025 true up will be reflected in the 2027 revenue requirement and rates (see next slide). Any 2026 true up will be reflected in the 2028 revenue requirements and rates.

2027 Projected Billing Rate

With thanks to ISO-NE for calculations -

2027 Budget: \$2,978,711

Less 2025 True Up: (\$814,301)

Total Revenue Recovery: \$2,164,410

Divided by Total Network Load: ~~223,165,587~~ 229,787,931

(total network load from 2026 ISO-NE tariff; no escalation or reduction — used in calculation)

~~2027 Schedule 5 Estimated Rate \$0.00970 per kW-month~~

Updated 2027 Schedule 5 *Actual* Rate: \$0.00942 per kW-month
based on now finalized 2027 Network Load factor

Thank you.

Questions?

The Nescoe logo is centered within a white circle that has a thin blue border. The circle is positioned on the right side of the slide, overlapping a large blue rectangular area that occupies the right half of the page. The logo itself consists of the word "NESCOE" in a bold, orange, sans-serif font. The letter "O" is replaced by a stylized lightning bolt icon, also in orange.

NESCOE

MEMORANDUM

TO: Participants Committee Members and Alternates

FROM: Pat Gerity, NEPOOL Counsel

DATE: September 25, 2026

RE: Environmental League of Massachusetts Governance Only End User Membership Application

You will be asked at the October 2, 2026 meeting to take action on the Governance Only End User membership application (Application) by the Environmental League of Massachusetts, Inc. (ELM), a Massachusetts non-profit corporation that has applied to be a Small End User. We have summarized below why the Application requires Participants Committee (NPC) action and the facts underlying the Application. Additional background materials and a form of resolution are also included with this memorandum.

A. Participants Committee Action Required

The Membership Subcommittee (Subcommittee) has prior NPC-delegated authority to approve membership applications that are subject to the Standard Membership Conditions, Waivers and Reminders (SCWRs). The Subcommittee, a self-selected group of Participant representatives which meets monthly, acts by unanimous consensus (i.e., no member objecting). The Subcommittee was unable to approve the Application by consensus because one End User Sector representative (Opposing Member) opposed Subcommittee approval of the Application as an End User Participant. After questions and discussion during the Subcommittee's September meeting addressing ELM's governance, the nature of its relationships with the three Participants that participate in ELM's Corporate Council,¹ and ELM's demonstration of its eligibility to join as an Small End User Participant, the Opposing Member stated his position that ELM should join as an Associate Non-Voting Participant, rather than as a voting End User Participant, and that the Participants Committee itself consider the ELM application. No other Participant representative objected to approving ELM's application to become a Small Governance Only End User.

B. Relevant NEPOOL Agreement End User Definitions and Eligibility

1. **End User Definition.** The Second Restated NEPOOL Agreement (RNA) defines End User Participant (§1.22) as:

a Participant which is (a) a consumer of electricity in the New England Control Area that generates or purchases electricity primarily for its own consumption, (b) a non-profit group representing such consumers,

¹ ELM's Corporate Council has approximately 35 members. It operates as an advisory and advocacy bridge between the private sector and environmental advocates. Its advisory nature is fundamentally collaborative, designed to align corporate strategy with ambitious state environmental policies. ELM representatives advised that the Corporate Council does not otherwise have a role in ELM's governance.

2. **End User Organization** (§ 1.21)as:

an End User Participant which is (a) a registered tax-exempt non-profit organization with (i) an organized board of directors and (ii) a membership of at least 100 Entities that buy electricity at wholesale or retail in the New England states or²

3. **Small End User** (§1.82) as:

an End User Participant which does not otherwise meet the definition of Large End User or End User Organization.

Supporting its Small End User election, ELM provided a copy of its Eversource electric bill. ELM did not provide a list of its donors/members. The practical distinction between a Governance Only Member that is a Small End User and an End User Organization is the more flexible ability of an End User Organization to have its vote cast by proxy or designation of *any* other Entity (rather than limited, as in the case of a Small End User, to a person that is not a Participant or Related Person of a Participant in a Sector other than the End User Sector). ELM's Small End User election is consistent prior End User Sector elections, including by Acadia Center (f/k/a Environment Northeast) and most recently by the Fiscal Alliance Foundation, which became a member earlier this year.

C. Associate Non-Voting Member Definition and Background

Associate Non-Voting Participant (§1.9A) is:

a Participant that is determined by the Participants Committee or its designee³ to be an Associate Non-Voting Participant. Notwithstanding any other provision of this Agreement, an Associate Non-Voting Participant shall not have the right to join, or be or vote as a member of, a Sector.

The current definition of Associate Non-Voting Participant, which evolved from previous definitions of Gas Industry Participant and Fuels Industry Participant, was established pursuant to the 134th Agreement Amending the RNA. The definition was renamed and changed primarily to distinguish and better characterize the group of gas industry participants and energy sector trade associations that had become Participants under these arrangements.⁴ At the time of that definition change, the NPC delegated to the Membership Subcommittee the authority to approve an applicant to be an Associate Non-Voting Participant, subject to acceptance of the Standard Conditions, Waivers and Reminders, if the Subcommittee determines that the applicant is either:

² The tax exempt organizations that are currently End User Organizations are: Associated Industries of Massachusetts, Conservation Law Foundation, Earthjustice, Environmental Defense Fund, Green Oceans, Industrial Energy Consumer Group, Industrial Wind Action Corp, Maine Skiing, Massachusetts Climate Action Network, Natural Resources Defense Council, PowerOptions, Sierra Club, The Energy Consortium, and the Union of Concerned Scientists.

³ For these purposes, the Membership Subcommittee is the Participants Committee's designee.

⁴ There are currently 6 Associate Non-Voting Members – 3 gas industry participants (American Petroleum Institute, Repsol Energy North America, and Algonquin Gas Transmission) and 3 energy sector trade associations (AEU, NEPGA, and RENEW).

(i) a **gas industry participant** (i.e. an Entity that meets all four of the following criteria: (a) the Participant is engaged in the production, gathering, processing, marketing, or transmission of natural gas for sale at wholesale or retail in one or more of the New England states; and (b) the Participant does not participate directly in the New England Markets; and (c) the Participant is not eligible to join or designate a voting member of a Sector (other than the End User Sector); and (d) the Participant elects to be treated as an Associate Non-Voting Participant before its membership application is approved by NEPOOL); or

(ii) an **energy sector trade association** (i.e. an organization of Entities engaging in the storage, production, supply, transportation, or distribution of energy, organized to promote and improve business conditions in the energy sector and not to engage in a regular business of a kind ordinarily carried on for profit, and no part of the net earnings of which inures to the benefit of any of its members).

ELM does not meet either the definition of gas industry participant or energy sector trade association.

D. Membership Subcommittee Discussion

At the September 14, 2026 Subcommittee meeting, some concerns were raised with the participation of Participants on ELM's Corporate Council and the potential impact that might have on ELM's participation and positions in the Participant Processes. The ELM representative provided reassurance of the advisory nature of ELM's Corporate Council and provided other distinguishing features of ELM's application. Members were also reminded how such concerns had been addressed previously in the context of prior membership applications. At the conclusion of the discussion, there were no objections to ELM's application as a Governance Only Small End User, but for the objection of Opposing Member. That objection was sufficient to advance the matter for Participation Committee consideration.

E. Form of Resolution for Participants Committee Action

The following form of resolution could be used for Participants Committee action on this matter:

RESOLVED, that the Participants Committee approves the application of the Environmental League of Massachusetts, Inc. to be a Governance Only Small End User subject to the following conditions: (1) that NEPOOL Counsel and the ISO find ELM's Application complete; (2) that the ELM sign and return the Standard Membership Conditions, Waivers and Reminders letter; (3) that ELM execute an Indemnification Agreement to permit an expedited membership effective date [and (4) {specify any additional conditions or understandings}].

If there are questions on any of the above, please feel free to contact me.

MEMBERSHIP APPLICANT QUESTIONNAIRE
New England Market / New England Power Pool

Please note: All Applicants are required to provide detailed information to the New England Membership Coordinator regarding any changes to the information supplied herein after the application has been submitted. Capitalized terms used but not defined in this Questionnaire are intended to have the same meaning given to such terms in the Second Restated New England Power Pool Agreement (the "2d RNA"), the Participants Agreement ("PA"), or the ISO New England Inc. ("ISO") Transmission, Markets and Services Tariff ("ISO Tariff"). Applications expire 12 months from the date the application is reviewed by the Membership Subcommittee. All materials may be subject to update if 6 months or older. **Application fees paid are non-refundable.**

I. Applicant Name (full corporate name or full name if Applicant is an individual):

_____Environmental League of Massachusetts, Inc. _____

A. Corporate Form. Applicant is (please check appropriate category):

- ☒ Corporation created under the laws of _____ Non-profit corporation under MA law _____
- ☐ LLC (limited liability company) created under the laws of _____
- ☐ Political subdivision (US or US State, Canada or Canadian Province, or an agency thereof)
- ☐ Partnership ☐ Natural Person ☐ Electric cooperative
- ☐ Other (please describe): _____

B. Date of incorporation/formation/organization (MM-DD-YYYY): 03/06/1997

C. Registered & Principal Place of Business: 15 Court Square, Suite 1000, Boston, MA 02108

D. Description of Applicant's business operations: Nonprofit policy advocacy (C3)

E. Prior New England Registration. Has Applicant previously registered with the ISO or NEPOOL?

- ☒ No. Proceed to Section II.
- ☐ Yes. Provide Participant Name and ID number: _____

II. Web Page Address: https://www.environmentalleague.org

III. Applicant Dun & Bradstreet Number: 780868576

All Applicants must have a D&B number assigned to the Applicant named in Section I.

If applied for but not yet received, please so indicate.

IV. Related Persons that are Participants. Does Applicant have a Related Person/Affiliate that is currently a NEPOOL Member or Market Participant?

- ☒ No. Proceed to Section V.
- ☐ Yes. Please provide the name of the Related Person(s): _____

V. Requested Effective Date of Membership: November 1, 2026

(Please note: Requested Effective Date should reflect the first day of a month and allow for the 60-day notice period required by the FERC following the approval of the application. Applicants which wish to be treated as if they were Participants during the interim period before the FERC has acted in a favorable manner on their application may request an earlier Effective Date with the understanding that requests for such treatment will generally be granted subject to execution of an Indemnification Agreement with the ISO and NEPOOL.)

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VI. Activities. Please identify all activities that Applicant will or plans to conduct in New England (*pending appropriate approvals*) as a New England Market and/or NEPOOL Participant (*select all that apply*):

- ☐ **Alternative Resource Provider** ("substantial business interest" in Alternative Resources located within the New England Control Area)
- ☐ **Broker** (arranges power transactions without taking title)
- ☐ **Cooperative**
- ☒ **End User:** ☒ **Governance Only Member** ☐ **Market Participant End User** ("MPEU")
 - ☐ **Large End User** (a single end user with a peak monthly demand for load in New England, including load served by End User Behind-the-Meter Generation, of at least one 1 MW, or a group of 2 or more corporate entities each with a peak monthly demand (non-coincident) for load in New England, including load served by End User Behind-the-Meter Generation, of at least 0.35 MWs that together totals at least 1 MW). *Please indicate peak monthly demand (non-coincident) for load in New England, including load served by End User Behind-the-Meter Generation: _____ MW.*
 - ☐ **End User Organization**
 - ☐ Non-profit organization (_____ 501(c)(3); _____ (other)) with an organized board of directors and a membership of:
 - ☐ at least 100 Entities that buy electricity at wholesale or retail in the New England states; or
 - ☐ Entities with an aggregate peak monthly demand (non-coincident) for load in New England, including load served by End User Behind-the-Meter Generation, of at least 10 MW.
 - ☐ **Municipality** or other **governmental agency** located in New England which does not meet the definition of Publicly Owned Entity
 - ☒ **Small End User** (an End User which is not a Large End User or End User Organization.)
- ☐ **Exempt Wholesale Generator ("EWG")**
- ☐ **Financial Marketer/Trader** (submits Increment Offers and/or Decrement Bids in the Day-Ahead Market)
- ☐ **FTR-Only Customer**
- ☐ **Fuels Industry Participant** (as defined in the 2d RNA)
- ☐ **GIS-Only Participant** (as defined in the 2d RNA)
- ☐ **Independent Power Producer** (exclusive business is owning or owning and operating all or a part of one or more generating facilities and selling electric energy at wholesale or retail, but not an EWG or QF)
- ☐ **Load Aggregator** (purchases at wholesale to sell at retail)
- ☐ **Publicly Owned Entity** (as defined in the 2d RNA)
- ☐ **Power Marketer** (purchases and sells at wholesale)
- ☐ **Provisional Member** (see 2d RNA for qualifications)
- ☐ **Qualifying Facility ("QF")**. *Please provide the FERC docket number in which:*
- ☐ **Related Person Supplier** (see 2d RNA for qualifications)
- ☐ **Transmission and/or Distribution Company**
- ☐ **Other** (please describe) _____

EVERSOURCE

Account Number: [REDACTED]
Statement Date: 08/07/26

Service Provided To:
ENVIRONMENTAL LEAGUE OF

Payment will be sent to bank
for processing on 08/28/26

\$579.89

Amount Due On 08/01/26	\$1,560.53
Last Payment Received On 07/28/26	-\$1,560.53
Balance Forward	\$0.00
Total Current Charges	\$579.89

Total Cost of Electricity

Supply

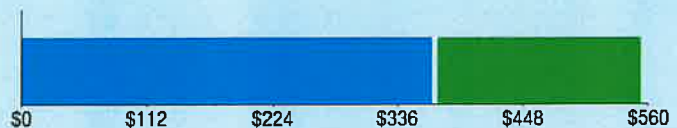
\$366.59

Cost of electricity from
Eversource

Delivery

\$183.53

Cost to deliver electricity
from Eversource



Your electric supplier is

Eversource
247 Station Drive
Westwood, MA 02090

News For You

For customers who obtain Basic Service from Eversource, an updated supply rate took effect Aug 1. The average customer using 600 kWh per month will see an increase of approximately 5% or \$10. We do not profit from the energy supply we provide you. What we pay is what you pay. Visit eversource.com/billhelp for info on payment plans and other assistance programs available to you.

Remit Payment To: Eversource, PO Box 56007, Boston, MA 02205-6007

GB20260807.txt

EVERSOURCE

Account Number: [REDACTED]

You may be subject to a 1.08% late payment charge if the "Total Amount Due" is not received by 09/01/26

ENVIRONMENTAL LEAGUE OF
15 COURT SQ
BOSTON MA 02108-2503

Please make your check payable to Eversource and consider adding \$1 for Good Neighbor.

Visit eversource.com to make your payment today. If mailing payment, please allow up to 5 business days to post.

Payment will be sent to bank
for processing on 08/28/26

\$579.89

Amount Enclosed

Eversource
PO Box 56007
Boston, MA 02205-6007

7402027513233 0000579898 0000579898

EVERSOURCE

Account Number: [REDACTED]
Customer name key: ENVI
Statement Date: 08/07/26
Service Provided To:
ENVIRONMENTAL LEAGUE OF

**Svc Addr: 141 TREMONT ST 3FL
BOSTON MA 02111**
Rate G1-Small General Service DMD Cycle 21
Service from 06/26/26 - 07/25/26 30 Days
Next read date on or about: Aug 31, 2026

Meter Number	Current Read	Previous Read	Current Usage	Reading Type
25 37340	47360	46776	584	Actual
Current Demand = 4.5				

Service Reference: 91837732

Monthly kWh Use

May	Jun	Jul
610	606	584

**Svc Addr: 141 TREMONT ST 3FL
BOSTON MA 02111**
Rate G1-Small General Service DMD Cycle 21
Service from 06/26/26 - 07/25/26 30 Days
Next read date on or about: Aug 31, 2026

Meter Number	Current Read	Previous Read	Current Usage	Reading Type
53274	43671	41816	1855	Actual

Service Reference: 91837731

Monthly kWh Use

May	Jun	Jul
3099	4586	1855

Payment will be sent to bank
for processing on 08/28/26

\$579.89

Electric Account Summary

Amount Due On 08/01/26	\$1,560.53
Last Payment Received On 07/28/26	-\$1,560.53
Balance Forward	\$0.00
Current Charges/Credits	
Electric Supply Services	\$366.59
Delivery Services	\$183.53
Other Charges or Credits	\$29.77
Total Current Charges	\$579.89
Total Amount Due	\$579.89

Total Charges for Electricity

Supplier (Eversource)

Meter [REDACTED]		
Generation Service Charge	584 kWh X .15030	\$87.78
Meter [REDACTED]		
Generation Service Charge	1855 kWh X .15030	\$278.81
Subtotal Supplier Services		\$366.59

Delivery

G1-Small General Service DMD

Meter [REDACTED]		
Customer Charge		\$20.00
Distribution Charge	584 kWh X .03496	\$20.42
Transition Charge	584 kWh X -0.00077	-\$0.45
Net Meter Recovery Surcharge	584 kWh X .00483	\$2.82
Revenue Decoupling Charge	584 kWh X -0.00034	-\$0.20
Distributed Solar Charge	584 kWh X .00450	\$2.63
Renewable Energy Charge	584 kWh X .00050	\$0.29
Energy Efficiency Charge	97 kWh X .01072	\$1.04
Energy Efficiency Charge	487 kWh X .01389	\$6.76
Electric Vehicle Program	584 kWh X .00180	\$1.05

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Eversource is required to comply with Department of Public Utilities' billing and termination regulations. If you have a dispute please see the bill insert for more information.

For an electronic version of this insert, residential customers go to [Eversource.com/about-residential-bill](https://eversource.com/about-residential-bill) and business customers go to [Eversource.com/about-business-bill](https://eversource.com/about-business-bill). Then select "Monthly Bill Inserts" from the page. Budget Billing is also available to pay a more consistent bill each month. Please see the Customer Rights Supplement for more information.



Account Number: [REDACTED]
Customer name key: EMI
Statement Date: 08/07/26
Service Provided To:
ENVIRONMENTAL LEAGUE OF

Continued from previous page...

Contact Information

Emergency: 800-592-2000
www.eversource.com
Pay by Phone: 888-783-6618
Customer Service: 800-340-9822

Important Messages About Your Account

Because the billing period spans a change in the rates, your usage has been calculated partly on the old rate and partly on the new rate.

Please note: Payment processes differ for each bank. Therefore, it may take longer than the date that appears on your bill for the funds to be deducted from your bank account.

Thank you for going paperless.

We have been informed that you have chosen BILLING FOR CITY OF BOSTON CCE as your energy supplier. Effective with your next bill, Eversource will be billing on behalf of your supplier.

Payment will be sent to bank
for processing on 08/28/26

\$579.89

Continued from previous page...

Meter	[REDACTED]	
Customer Charge		\$20.00
Distribution Charge	1855 kWh X .03496	\$64.85
Transition Charge	1855 kWh X -0.00077	-\$1.43
Net Meter Recovery Surcharge	1855 kWh X .00483	\$8.96
Electric Sect Mod Plan Charge	1546 kWh X .00001	\$0.02
Revenue Decoupling Charge	1855 kWh X -0.00034	-\$0.63
Distributed Solar Charge	1855 kWh X .00450	\$8.35
Renewable Energy Charge	1855 kWh X .00050	\$0.93
Energy Efficiency Charge	309 kWh X .01072	\$3.31
Energy Efficiency Charge	1546 kWh X .01389	\$21.47
Electric Vehicle Program	1855 kWh X .00180	\$3.34
Subtotal Delivery Services		\$183.53
Total Cost of Electricity		\$550.12
Other Charges or Credits		
Sales Tax		\$29.77
Subtotal Other Charges or Credits		\$29.77
Total Current Charges		\$579.89

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VII. Regulatory Authorization. Markets Participants must either (i) have on file with the FERC market-based rate authority or other FERC-approved basis for setting prices for services offered by means of the New England Transmission System or (ii) be exempt from the requirement to have, or otherwise not be required to have, rates for services on file with the FERC. Please provide the FERC docket number in which:

- ☐ FERC granted market-based rate authorization ER
- ☐ EWG status was obtained EG
- ☐ QF status was obtained QF
- ☐ Describe other FERC-approved basis _____
- ☒ Exempt from, or not subject to, FERC requirements to have rates on file with the FERC

VIII. Generation (All Applicants):

A. Applicant's Generation

- ☒ No Generation. (proceed to 0.B)
- ☐ Developing Generation.*
- ☐ (i) Owns, or (ii) leases with rights equivalent to ownership, facilities for the generation of electric energy that are located in the New England Control Area.*
** Please indicate on a separate sheet of paper attached to this Questionnaire the following information for each such facility: (1) CELT Asset ID (if known); (2) Total Generation (Name-Plate Capacity); (3) Net Generation; and (4) Ancillary services to be provided.*

B. Affiliate's Generation

- ☒ No Generation.
- ☐ Affiliate(s) (i) Own, or (ii) lease with rights equivalent to ownership, facilities for the generation of electric energy that are located in the New England Control Area. *Please indicate on a separate sheet of paper attached to this Questionnaire a list of Generation assets in the New England Control Area owned by your Affiliates identified pursuant to Section XIII.*

IX. OATT Information (All Applicants):

A. Business Across the External Interfaces. Does the Applicant anticipate conducting business across the external interfaces under the ISO's Open Access Transmission Tariff ("OATT")?

- ☒ **No.** Proceed to IX.B below.
- ☐ **Yes.**
 1. **NERC Purchasing Selling Entity (PSE) code:** _____
 2. Applicant must (i) complete the OASIS registration process for external transactions, which is described in detail on the ISO's website: <https://www.iso-ne.com/participate/applications-status-changes/access-software-systems>.
PLEASE NOTE: OASIS access will only be approved for a Market Participant as defined by its associated DUNs number. OASIS certificates will not be approved for member company branches with a different number than the member.

B. Regional Network Load. Does the Applicant anticipate that it will be responsible for Regional Network Load under Section II.B. of the OATT?

- ☒ **No.** Proceed to Section X or XI if applicable; Section XII if not.
- ☐ **Yes.** Applicant may need to complete and submit an Application for Regional Network Service ("RNS Application"). Prior to submitting a completed RNS Application, it is recommended that the Applicant contact ISO-NE Participant Support (askiso@iso-ne.com) and request guidance from the ISO-NE Operations Tariff & Agreement Manager with regard to the need to submit an application at this time. The RNS Application can be found at: http://www.iso-ne.com/static-assets/documents/trans/services/types_apps/rns_tout_srvc_agrmnt_app.docx.

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X. Market Participant End User Information (if applicable): Not applicable

- A. Current LDC** (Local Distribution Company): _____
- B. MPEU Accounts to be Served.** List ALL account number(s) and/or meter number(s) for loads to be served by Applicant as an MPEU (attach separate sheet if necessary):
- | <i>Account Number(s) and/or</i> | <i>Meter Number(s)</i> |
|---------------------------------|------------------------|
|---------------------------------|------------------------|
- C. Peak Load.** Highest aggregated hourly load in any month in the preceding year ("Peak Load") for all accounts listed in Section IX.B above: _____
- D. Authorization:** By submission of this questionnaire, Applicant expressly authorizes the LDC identified in IX.A above to release to ISO and NEPOOL representatives the information necessary to determine and/or verify Applicant's coincident Peak Load, subject to the terms and conditions of the ISO New England Information Policy.

XI. Alternative Resources Provider Data (if applicable): Not applicable

- A. Aggregate Governance Rating.**¹ For all Alternative Resources ("AR") owned or controlled by Applicant or its Related Persons in the New England Control Area:
- Renewable Generation: _____ MW Distributed Generation: _____ MW Load Response: _____ MW

B. Substantial Business Interest in Alternative Resources (*check and complete all that apply*):

- ☐ at least 75% of the Energy resources owned or controlled by the Undersigned within the New England Control Area are Alternative Resources. Alternative Resources are _____% of the Energy resources owned or controlled by the Undersigned within the New England Control Area.
- ☐ Applicant owns or controls at least 50 MW of AR within the New England Control Area.
- ☐ has an independently verifiable capital investment in its Alternative Resources in the New England Control Area of at least \$30 million.
- AND**
- ☐ the quantity of Alternative Resources (in megawatts) and other generation resources in the New England Control Area owned or controlled by it (_____ MW) exceeds the highest quantity of hourly Governance Load responsibility held by the Participant in the prior twelve (12) months (_____ MW).
- ☐ the quantity of generation (in megawatt hours) in the past twelve months from Alternative Resources and other generation resources in the New England Control Area that the Participant owns or controls (_____ MWh) exceeds the total quantity of Governance Load responsibility held by the Participant in the prior twelve (12) months (_____ MWh).
- ☐ the Participant has not held any Governance Load responsibility in the prior twelve (12) months.
- OR**
- ☐ Applicant is unable to check a box in each part of Section X.B. above and requests a determination by the AR Sector and Participants Committee that it has "a Substantial Business Interest" in AR.

¹ Governance Rating is (a) for electric generating units or combination of units (other than a Distributed Generation Resource), (i) the Winter Capability of such unit or combination of units determined by the ISO, or (ii) the aggregate name plate rating of such unit or combination of units; (b) for Demand Response Resources, the highest adjusted capability value (determined in accordance with the Load Response Program) for those Demand Response Resources in the prior twelve (12) months; (c) for Distributed Generation Resources not participating in the New England Markets or the Load Response Program, the name plate rating of the Distributed Generation Resource; or (d) for Energy Efficiency Resources, the highest verified co-incident peak savings provided during the hours of the Load Response Program during the prior twelve (12) months.

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XII. Sector or Provisional Member Selection. Please indicate the Sector you will join as a Participant of the New England Power Pool (*check only one*):

- ☐ **Generation Sector.** Aggregate Winter Capability (in megawatts) for your generation facilities in the New England Control Area: _____. (2d RNA Section 6.2(a))
 - ☐ **Individual Voting Member.** (if > 15 MW and not electing the Group Seat immediately below)
 - ☐ **Group Seat.** ** (mandatory under 15 MW; optional 15 MW and above)
- ☐ **Transmission Sector.** Amount of original capital investment in PTF owned or leased with rights equivalent to ownership in PTF: _____. (2d RNA Section 6.2(b))
- ☐ **Supplier Sector.** (2d RNA Section 6.2(c))
- ☐ **Alternative Resources Sector.** (Check one Sub-Sector and one certification). *Note: a Participant eligible to join the End User Sector shall not join the AR Sector. (2d RNA Section 6.2(d))*
 - ☐ **Renewable Generation** Sub-Sector (2d RNA Section 6.2(d)(i)(1))
 - ☐ **Distributed Generation** Sub-Sector (2d RNA Section 6.2(d)(i)(2))
 - ☐ **Load Response** Sub-Sector (2d RNA Section 6.2(d)(i)(3))

Applicant certifies that it, together with all of its Related Persons (*check only one*):

- ☐ meets the minimum requirements necessary to designate an individual voting member, and an alternate to the member, of each Principal Committee in the AR Sub-Sector selected above. The names of each Principal Committee member and alternate to that member are listed in Section XIII.
- ☐ elects together with the AR Providers identified herein (together, the "Self-Defined Group") to be represented by a "self-defined" group voting member and an alternate to that member for each Principal Committee. The Self-Defined Group meets the minimum requirements of the AR Sub-Sector selected above for the designation of a "self-defined" group voting member. The names of each Principal Committee voting member and alternate to that member for the Self-Defined Group are listed in Section XIII.

The Self-Defined Group will be composed of the following AR Providers:

- ☐ is entitled and elects to join the Large Renewable Generation Group Seat.
- ☐ will join the Small Group Seat of the Sub-Sector identified above.
- ☐ **Publicly Owned Entity Sector.** (2d RNA Section 6.2(e))
- ☒ **End User Sector.** (2d RNA Section 6.2(f))
 - ☒ **Governance Only Member**
 - ☐ **Market Participant End User (MPEU)**

OR

- ☐ **Provisional Member Group Seat.** (Provisional Members that do not have a Participant Related Person in a Sector will be assigned to this group seat). Applicant intends to join the following Sector when eligible:

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XIII. Affiliate Information:

*The governance provisions of the 2d RNA require that Related Persons² vote together on NEPOOL matters. The Related Person definition is one that was required by the FERC and agreed to among the Participants. In addition, the ISO has an obligation to ensure that members of its board of directors and staff are not affiliated with any of the NEPOOL Participants and their Affiliates.³ The Participants and the FERC required that policies related to affiliation be implemented to enhance the perceived and actual independence of the ISO. There are additional Tariff provisions that require Affiliate evaluation. To ensure compliance with these obligations, each Governance Participant is required to identify its Affiliates. Accordingly, please provide a **flow chart** illustrating the corporate structure of which applicant is a part, including **all parent and subsidiary relationships**; and **every** other Affiliate that is a:*

- **Market Participant Affiliate** (any Affiliate that is an ISO customer and/or NEPOOL member, or a market participant in another wholesale electricity market);
- **Code of Conduct Affiliate** (any Affiliate whose securities⁴ trade or are available publicly); or
- **LOC Affiliate** (any Affiliate that is included on the ISO's list of "Acceptable Letter of Credit Banks" posted at: http://www.iso-ne.com/static-assets/documents/stlmnts/assur_crdt/approved_letter_of_credit_banks.pdf).

² Section 1 of the 2d RNA provides that, "A Related Person of a Participant is (a) for all Participants, either (i) a corporation, partnership, business trust or other business organization 10% or more of the stock or equity interest in which is owned directly or indirectly by, or is under common control with, the Participant, or (ii) a corporation, partnership, business trust or other business organization which owns directly or indirectly 10% or more of the stock or other equity interest in the Participant, or (iii) a corporation, partnership, business trust or other business organization 10% or more of the stock or other equity interest in which is owned directly or indirectly by a corporation, partnership, business trust or other business organization which also owns 10% or more of the stock or other equity interest in the Participant, or (iv) a natural person, or a member of such natural person's immediate family, who is, or within the last 6 months has been, an officer, director, partner, employee, or representative in NEPOOL activities of, or natural person having a material ongoing business or professional relationship directly related to NEPOOL activities with, the Participant or any corporation, partnership, business trust or other business organization related to the Participant pursuant to clauses (i), (ii) or (iii) of this Section (a); and (b) for all End User Participants which are also natural persons, a Related Person is (i) a member of such End User's immediate family, or (ii) a Participant and any corporation, partnership, business trust, or other business organization related to the Participant pursuant to clauses (i), (ii) or (iii) of Section (a), of which such End User Participant, or a member of such End User Participant's immediate family, is, or within the last six (6) months has been, an officer, director, partner, or employee of, or with which an individual End User Participant has, or within the last twelve (12) months had, a material ongoing business or professional relationship directly related to NEPOOL activities, or (iii) another Participant which, within the last twelve (12) months, has paid a portion of the End User Participant's expenses under Section 14 of [the NEPOOL] Agreement, or (iv) a corporation, partnership, business trust or other business organization in which the End User Participant owns stock and/or equity with a fair market value in excess of \$50,000. (c) Notwithstanding the foregoing, for the purposes of this definition, an individual shall not be deemed to have or had a material on-going business relationship directly related to NEPOOL activities with any corporation, partnership, business trust, other business organization or Publicly Owned Entity solely as a result of being served, as a customer, with electricity or gas."

³ Pursuant to the ISO's Code of Conduct, Affiliate "with respect to an entity, means any individual, corporation, partnership, firm, joint venture, association, joint-stock company, trust or unincorporated organization, or other form of entity, directly or indirectly Controlling, Controlled by, or under common Control with, such entity. The term "Control" means the possession, directly or indirectly, of the power to direct the management or policies of an entity. A voting interest of ten percent or more creates a rebuttable presumption of control."

⁴ "Securities" means stocks, stock options, bonds and any other instruments of debt or equity, and includes all interests in debt or equity instruments, including, without limitation, secured and unsecured bonds, debentures, notes, securitized assets, commercial paper, preferred and common stock, any beneficial or legal interest derived from a trust, and any right to acquire any long or short position in such securities, including, without limitation, interests convertible into the aforementioned securities, options, rights, warrants, puts, calls and straddles with respect to such securities.

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XIV. Application Contact Information *(leave no box empty)*:

A. Application Contacts (for further information regarding this application):

Application Primary Contact	Application Alternate Contact
Name: Erin Smith	Name: Amy Boyd Rabin
Title: Energy and Grid Policy Director	Title: Vice President of Policy and Regulatory Affairs
Address: 141 Tremont St, Floor 3, Boston MA 02111	Address: 141 Tremont St, Floor 3, Boston MA 02111
Phone: 617-963-0074	Phone: 617-221-8258
Fax:	Fax:
E-mail: esmith@environmentalleague.org	E-mail: aboydrabin@environmentalleague.org

B. Financial Assurance ("FA") Contacts *(2 contacts required)*:

Primary FA Contact	Alternate FA Contact
Name: Kelly Lynch	Name: Harry Meltzer
Title: Finance Director	Title: Accounting Coordinator
Address: 141 Tremont St, Floor 3, Boston MA 02111	Address: 141 Tremont St, Floor 3, Boston MA 02111
Phone: 781-691-4154	Phone: 617-963-0076
Fax:	Fax:
E-mail: klynch@environmentalleague.org	E-mail: hmeltzer@environmentalleague.org

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C. Affiliate Information and Asset Registration Contacts: Not Applicable

Affiliate Information Contact:	Asset Registration Contact:
Name:	Name:
Title:	Title:
Address:	Address:
Phone:	Phone:
Fax:	Fax:
E-mail:	E-mail:

D. Participant Contact *(only if Applicant (i) is a Related Person to a current NEPOOL Participant or (ii) will be represented by a group voting member)*: Not Applicable

Participant Contact	Participant Contact
Name:	Name:
Title:	Title:
Address:	Address:
Phone:	Phone:
Fax:	Fax:
E-mail:	E-mail:

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XV. Principal NEPOOL Committee Designations *(only if Applicant (i) is not a Related Person to a current NEPOOL Participant or (ii) will not be represented by a group voting member):*

A. PARTICIPANTS COMMITTEE

NPC Member	NPC Alternate
Name: Erin Smith	Name: Amy Boyd Rabin
Title: Energy and Grid Policy Director	Title: Vice President of Policy and Regulatory Affairs
Address: 141 Tremont St, Floor 3, Boston MA 02111	Address: 141 Tremont St, Floor 3, Boston MA 02111
Phone: 617-963-0074	Phone: 617-221-8258
Fax:	Fax:
E-mail: esmith@environmentalleague.org	E-mail: aboydrabin@environmentalleague.org

B. MARKETS COMMITTEE

Markets Committee Member	Markets Committee Alternate
Name: Erin Smith	Name: Amy Boyd Rabin
Title: Energy and Grid Policy Director	Title: Vice President of Policy and Regulatory Affairs
Address: 141 Tremont St, Floor 3, Boston MA 02111	Address: 141 Tremont St, Floor 3, Boston MA 02111
Phone: 617-963-0074	Phone: 617-221-8258
Fax:	Fax:
E-mail: esmith@environmentalleague.org	E-mail: aboydrabin@environmentalleague.org

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C. RELIABILITY COMMITTEE

Reliability Committee Member	Reliability Committee Alternate
Name:	Name:
Title:	Title:
Address:	Address:
Phone:	Phone:
Fax:	Fax:
E-mail:	E-mail:

D. TRANSMISSION COMMITTEE

Transmission Committee Member	Transmission Committee Alternate
Name: Erin Smith	Name: Amy Boyd Rabin
Title: Energy and Grid Policy Director	Title: Vice President of Policy and Regulatory Affairs
Address: 141 Tremont St, Floor 3, Boston MA 02111	Address: 141 Tremont St, Floor 3, Boston MA 02111
Phone: 617-963-0074	Phone: 617-221-8258
Fax:	Fax:
E-mail: esmith@environmentalleague.org	E-mail: aboydrabin@environmentalleague.org

Environmental League of Massachusetts, Inc.

XVI. Registration For Eligible FTR Bidder and/or FTR Holder Status: Not applicable

Complete only if registering for Eligible FTR Bidder and/or FTR Holder Status

A. First Auction Period for which Market Participant requests it be deemed an Eligible FTR Bidder and/or FTR Holder (MM/YYYY):

(Please note: The First Auction Period requested should allow for satisfaction of the applicable financial assurance criteria, which is Exhibit IA to the ISO Tariff, and any other standards and procedures that may be set forth in the ISO New England Manuals and ISO New England Administrative Procedures)

B. Eligible FTR Bidder or FTR Holder Contact Information:

Correspondence in connection with the administration of FTR Auction should be addressed to:		
Contact(s) and Titles(s):		
Primary:		Alternate:
Address – Street	City, State	Zip
Phone(s):	Fax #:	E-mail address(es):

C. Authorization

The undersigned Participant hereby registers as shown above to become an Eligible FTR Bidder and/or FTR Holder in accordance with the ISO New England Filed Documents and System Rules, including the ISO Tariff and the Market Rules.

Participant FTR Customer

By its Duly Authorized Officer

Name: _____

Title: _____

Date: _____

COUNTERPART SIGNATURE PAGE
NEW ENGLAND POWER POOL AGREEMENT

IN WITNESS WHEREOF, the undersigned has caused this counterpart signature page to
the New England Power Pool Agreement, being dated as of September 1, 1971, as amended, to
be executed by its duly authorized representative as of September 11, 2026
(please insert date)

Environmental League of Massachusetts, Inc.
(Applicant Company Name)

By: Elizabeth Henry
Name: Elizabeth Henry

Title: President

Company: Environmental League of
Massachusetts, Inc.

Address: 141 Tremont St, Floor 3,
Boston MA 02111

RESOLUTION FOR ADOPTION BY NEPOOL APPLICANTS

**CERTIFIED RESOLUTION OF THE BOARD OF DIRECTORS OF THE
ENVIRONMENTAL LEAGUE OF MASSACHUSETTS, INC.**

The undersigned, being the Chair of the Environmental League of Massachusetts Inc. (ELM) (the "Company"), a Massachusetts corporation, certifies that on a meeting of the Board of Directors of the Company held on 9/10/2026 in accordance with the provisions of the duly-adopted by-laws of the Company, the following resolution was adopted and the same remains in full force and effect as of the date hereof.

RESOLVED, that the Environmental League of Massachusetts, Inc. shall apply to become a Participant in the New England Power Pool under the New England Power Pool Agreement dated as of September 1, 1971, as amended, (the "Agreement") and the President, Elizabeth Henry, is authorized to execute a counterpart of the Agreement on behalf of the Environmental League of Massachusetts, Inc. and to cause the Environmental League of Massachusetts, Inc. to perform its obligations under the Agreement upon the effectiveness of its membership.

Dated: 9/10/26



By Gordon Burnes
Its Chair