From:	Henderson, Michael
To:	Congestion Study Comments; Meyer, David
Cc:	Doe, Stanley; Kowalski, Richard; Paradise, Theodore
Subject:	DOE Congestion Study
Date:	Monday, October 20, 2014 10:12:20 AM
Attachments:	image001.png

ISO New England is pleased to provide comments on the public draft of the DOE Congestion Study. The ISO appreciates DOE's consideration of several specific comments shown in red below.

Comments:

Figure ES-2:

It is possible to identify the consistent impacts of a few specific constraint points and congestion hot spots from pricing maps – in particular the Upper Michigan Peninsula, Delaware, and New Jersey and New York City, and the constraints that follow the Appalachian Mountains from where?

Footnote 7:

RPSs do not directly require investment in infrastructure. In some regions, like ISO-NE, the owners of the new capacity or Renewable Energy Certificate (REC) marketers are required to ensure adequate transmission capacity to deliver the resources or the load serving entity may make Alternative Compliance Payments, which also serve as a cap on the price of RECs. In other regions, sufficient capacity already exists. For instance a NYISO wind study indicates no major high voltage transmission additions would be necessary to accommodate additional wind resources, although certain contingencies and local transmission facilities cause some "bottling" of wind production. NYISO (2010b). *Growing Wind: Final Report of the NYISO 2010 Wind Generation Study.* Renesselaer, NY: NYSIO. September 2010, http://www.nyiso.com/public/webdocs/markets_operations/services/planning/Documents_and_Resources/Special_Studies/Special_Studies_Documents/GROWING _WIND_-_Final_Report_of_the_NYISO_2010_Wind_Generation_Study.pdf.

Page xxii:

Increased levels of onshore low-cost wind generation in concentrated locations west of major load centers [Not west of Boston and Southern New England load concentrations. Suggest using the words "remote from" rather than "west of"], shipped as "as available capacity," which exceed the throughput capability of transmission facilities that were designed to meet the on-peak demands of load centers rather than deliver off-peak generation from remote wind locations.[13]

[13] As noted above, increases in remotely-located renewables is not a concern in all regions, e.g. NYISO (2010b). *Growing Wind: Final Report of the NYISO 2010 Wind Generation Study.* Renesselaer, NY: NYSIO. September 2010, http://www.nyiso.com/public/webdocs/markets_operations/services/planning/Doc

uments_and_Resources/Special_Studies/Special_Studies_Documents/GROWING _WIND_-_Final_Report_of_the_NYISO_2010_Wind_Generation_Study.pdf.

Page xxv:
Operational limits of critical 230 kV+ facilities which are rated below conductor emergency loading capabilities and transformer, circuit breaker and other equipment nameplate ratings. [Facilities may be limited by other factors, such as stability and voltage limits. This may not be an appropriate metric.]

page xxv:
Unique substation identification based on industry-adopted standardized naming conventions with GIS coordinates for bulk power facilities to ensure consistency across
various applications and tools. [Is this a Critical Energy Infrastructure Information issue?]

page xxv:
Consistent and publicly accessible data concerning proposed generation capacity in interconnection queues, as well as expected retirements, de-rates, and outages to enable retrofits of existing resources [This may present information policy issues.]

page xxvi and page 15:
Table ES-1 and Table 3-1 indicate that transmission utilization data was not available from ISO-NE. (We had provided links to the PAC presentations and will do so again.)

See:

http://www.iso-ne.com/isoexpress/web/reports/grid/-/tree/interchange-rt-actual-schd

and the supporting Excel spreadsheets for interface flow and LMPs

http://www.iso-ne.com/isoexpress/web/reports/load-and-demand/-/tree/historical-hourly-flows-and-limits

Page 49:

The best onshore renewable wind resources (i.e., those with the highest potential capacity factors) tend to be located far from load and sometimes in areas with less transmission
than desired for effective resource development. The best offshore renewable wind resources, however, are often located close to load centers, as is the case with New England.

Page 51:
Regions are responding to these challenges, in part, by changing transmission planning

processes. MISO, SPP and PJM have modified their formal planning processes over the past
few years to go beyond reliability considerations alone, and take account of a variety of
potential system benefits as they assess a portfolio of alternative transmission opportunities. [Suggest adding a footnote. New England has an economic planning process, but has not seen the need for Market Efficiency Transmission Upgrades due to the low levels of congestion on its system.] MISO and SPP in particular have found that planning and designing a balanced set of
transmission projects that ensure reliability and provide economic congestion relief can offer
more benefits overall, of which economic congestion relief is the largest component at the time
the analysis was conducted (as shown in Figure 6- 2).[108]

Page 65:

Figure 6-10 is corrupted.

Page 86:

7. Public Comment Process and Next Steps

This chapter provides information to readers about the comments sought by the Department,
how to file them, and the Department's plans for next steps regarding the study and National
Corridors.

7.1. Comments Sought by the Department

The Department welcomes comments on any aspect of this study. This includes comments on
the definitions, approaches, and data relied upon in preparing the study, as well as the study's
findings. [See above.]
The Department is particularly interested in comments on the reliance on publicly available
data to assess congestion and transmission constraints. In Chapter 3 this study discusses the
limitations of available data and indicates actions the Department intends to take to improve
data quality and availability in the future. The Department invites comments on these plans,
insight into whether such data would have value for other parties, and comment on possible
issues relating to the collection and public availability of the targeted data. [DOE is coordinating data collection with the EIPC. Publically available information that is readily available is preferred, which may be subject to CEII constraints.]
The Department is also interested in feedback on whether the study's findings warrant
consideration of National Corridors. Parties are invited to discuss potential corridors and
explain whether the information provided in the study would help support designation of any

specific location as a National Corridor, and why or why not. Parties are directed to Federal Power Act, 16 U.S.C. § 824p, also summarized in section I, for the factors the Secretary may consider in designating a National Corridor. Commenters who are aware of relevant, publicly available data and analyses not included in this study that could inform a decision on whether to designate a National Corridor should provide that information for the Department's consideration. [ISO-NE does not see the need for National Corridors in New England. The region has both little congestion and a robust planning process.]

The Department also invites comments on the usefulness and relevance of its triennial Congestion Study and of its authority to designate National Corridors in relation to ensuring that the Nation's transmission needs are met in a timely manner. Since the enactment of the enabling legislation for the Congestion Studies and the designation of National Corridors in 2005, a number of important developments related to electric system planning and transmission construction have occurred. These developments include:

a. FERC designated NERC the Electricity Reliability Organization with responsibilities for ensuring mandatory compliance with reliability rules, including timely planning for a reliable transmission system.

b. Under the Recovery Act, DOE provided $60 M to planning entities and state officials in all three U.S. interconnections to improve the depth and breadth of regional transmission planning.

c. FERC issued Order 1000, directing utilities under its jurisdiction to participate in regional-scale transmission planning, to take federal and state policy concerns into account in such planning, and to consult with neighboring planning entities about transmission-related challenges crossing shared boundaries and whether inter-regional transmission facilities would provide greater benefits than intra-regional facilities.[207]

d. FERC's regulations for exercising its backstop siting authority were rejected by the federal 4th Circuit and the Commission has not announced plans to adopt new regulations.

e. As noted in this study, the scale of transmission investment in recent years has been significantly greater than the amounts that were planned or under construction in 2005.

f. Regional planning entities now exist or are under development across most of the nation and many utilities and stakeholders now have as many as ten years of experience with more systematic and collaborative regional system assessment and planning.

g. All of the RTOs and ISOs have developed FERC-approved cost allocation methods for

transmission projects included within approved regional transmission plans, which have
helped ameliorate a significant barrier to new transmission investment.
h. More generation has been built and most regional planning entities and state and federal regulators recognize demand-side measures such as energy efficiency and demand response as valid ways to mitigate and manage the effects of local transmission
constraints and congestion.
In view of these changes, the Department seeks comment on the relevance and usefulness of
the triennial Congestion Studies and the possible designation of National Corridors as tools for
ensuring the continued construction of adequate and appropriate transmission facilities to
serve the national interest. In particular:
a. Does the Congestion Study continue to serve a useful purpose in informing the national
discussion of transmission infrastructure needs? Should the scope and process for conducting such studies be modified to better serve this objective? [The DOE report provides useful information. ISO-NE appreciates DOE's sensitivity to not replicate information available in other reports and to minimize the burden planning authorities must endure by providing timely data. New processes (including Order 1000, NERC reports, and EIPC studies) may obviate the need for much of the information provided in the DOE study.]
b. Does the possible designation of National Corridors, as the statutory language is now
written and interpreted by the courts, help to ensure that adequate and appropriate transmission infrastructure is built in a timely manner? [No comment.] Should the concept of such corridors, or the process for their designation be modified to better serve this objective? [DOE could consider examining needs analyses as summarized in regional system plans and review NERC violations in areas where there may be a need to expedite transmission development.]

207 As of the writing of this report FERC has not issued final orders approving regional entities' compliance plans.