



26 May 2026

Planning Advisory Committee
1 Sullivan Road
Holyoke, MA 01040

Dear Planning Advisory Committee,

As a project coalition, including National Grid Ventures, New England Power Company, Massachusetts Municipal Wholesale Electric Company, Energy New England Transmission, and PowerBridge LLC, we welcomed the opportunity to submit proposals into this important first solicitation under the newly established Longer-Term Transmission Planning (LTTP) process. We strongly support its objectives and have been committed to helping it succeed in identifying and delivering the best long-term solution for ratepayers and the region.

We developed an innovative and highly competitive proposal. It not only meets the stated objectives of the New England states, but also, as encouraged by NESCOE in its request to ISO-NE, which initiated this RFP, offers a cost-effective expanded scope which provides additional reliability and economic benefits that may not otherwise be realized through this solicitation.

At the March 24, 2026 Planning Advisory Committee (“PAC”) meeting, ISO-NE announced that four of the six proposals submitted as part of the 2025 Longer-Term Transmission Planning RFP (the “RFP”) would be excluded from further analysis because they did not meet the RFP’s minimum requirements during objective testing. Our proposals were two of those that ISO-NE is excluding from further analysis because they did not pass stability analysis.

While we have identified technical adjustments that result in stable performance, ISO-NE has rejected our mitigation proposal, deeming it a “material modification” simply because it is more than a clarification as noted in the May 27th PAC meeting materials.

ISO-NE’s tariff prohibits material modifications to Longer-Term Proposals in Attachment K, Section 16.4(g), but it does not define what constitutes a material modification:

“If the ISO identifies any minor deficiencies (compared with the requirements of Section 16.4(d)) in the information provided in connection with a Longer-Term Proposal, the ISO will notify the Qualified Transmission Project Sponsor that submitted the Longer-Term Proposal and provide an opportunity for the Qualified Transmission Project Sponsor to cure the deficiencies within the timeframe specified by the ISO. Upon request, Qualified Transmission Project Sponsors of Longer-Term Proposals shall provide the ISO with additional information reasonably necessary for the ISO’s evaluation of the proposed solutions. In providing information under this subsection (g), the Qualified Transmission

Project Sponsor may not modify its project materially or submit a new project, but instead may clarify its Longer-Term Proposal.”

In communication with our coalition, ISO-NE stated that “any submission of information that is not a clarification is a material modification that results in the exclusion of the proposal for failure to meet the Section 16.4(g) criteria”.

However, Section 16.4(g) does not explicitly disallow non-material modifications or specify that *only* clarifications are allowed. If this section had been intended to prohibit consideration of any modification, the tariff would have said simply that the project sponsor “may not modify its project.” It did not. Instead, the tariff used the narrower concept of a material modification, which necessarily leaves room for non-material modifications.

As noted in the May 27th PAC meeting materials, we identified that one critical fault that was shown to result in instability can be mitigated with the addition of an isolated circuit and second transformer within the converter station. This is the type of mitigation that would typically be identified in an iterative interconnection study process. Mitigations like this, that do not change the intent of the proposal and do not require any adjustment to the cost of the proposal to customers should not constitute a material modification.

Because the tariff does not define “material modification”, ISO-NE has flexibility to consider the impact of any adjustments or modifications in the context of the RFP and proposal’s intent.

As a project coalition, we disagree with ISO-NE’s decision and submit this letter to acknowledge that disagreement. We are concerned that ISO-NE is not allowing minor adjustments to proposals, even adjustments requiring no increase in bid price, that would ensure there is a strong competitive field, despite having processes to approve modifications after project award. By eliminating the majority of the solutions submitted based on one element of the evaluation, the ISO has significantly reduced the breadth of type and scope of solutions and will miss the opportunity to identify the best solution based on the full breadth of benefits and merits in the evaluation of all the criteria that are valued by the states.

For example, all expanded HVDC solutions were eliminated from further evaluation, leaving only more minimal-scoped HVAC solutions for consideration. This takes key benefits off the table for New England: reducing future costs by addressing additional interfaces on the system, adding black-start capability to help restore the grid following extreme events, and providing direct bi-directional control of power flow allowing operators greater flexibility for reliable system operation.

This narrow interpretation of the ISO-NE tariff could deny the region an opportunity to best reduce long-term costs for ratepayers, enhance resilience, and improve operational flexibility. Proposed competitive solutions intended for Long Term Regional Investments with opportunities to enable improved access to more affordable resources and the inevitable future load growth,

should not be eliminated solely based on addressable technical issues before they are holistically evaluated for their broader economic, operational, and reliability benefits for the region as the solicitation is designed for. This also risks leaving no options available for selection if remaining solutions do not perform well across the full evaluation criteria.

This solicitation has identified key issues with the LTTP process that we are eager to work through with ISO-NE, NESCOE, and NEPOOL: ISO-NE should engage with developers to discuss any minor technical adjustments required after RFP objective testing. For example, in the May 27th PAC meeting materials, ISO-NE acknowledged that Longer-Term Proposal C1 did in fact pass thermal and voltage testing, changing what was shared in March and pointing to the need for deeper engagement with developers before solutions are eliminated from further evaluation. ISO-NE should explicitly lay out all performance criteria and provide all models in their final form at the outset of the RFP to ensure developers have the best opportunity to develop comprehensive proposals and the solicitation focuses on differentiating factors to keep it competitive. The LTTP process can identify transmission investments that are essential to the region, and it is important for New England ratepayers that the process is improved to best deliver that value.

Sincerely,

Will Hazelip, President, National Grid Ventures US

Matthew Ide, Executive Director, Special Projects, Massachusetts Municipal Wholesale Electric Company

David Cavanaugh, Executive Director, ENE Transmission

Bryan Sanderson, Vice President, PowerBridge