

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc.

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Docket No. EL18-182-000

**COMMENTS OF  
THE NEW ENGLAND POWER GENERATORS ASSOCIATION, INC.**

Pursuant to Rule 211 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),<sup>1</sup> the New England Power Generators Association, Inc. (“NEPGA”)<sup>2</sup> hereby files these Comments on ISO New England Inc.’s request for an extension of the deadline for filing market design changes to address New England’s winter fuel security needs, from July 1 to November 15, 2019.<sup>3</sup> NEPGA supports ISO-NE’s request due to its representation that the extension will allow it “to better develop its market design proposal for winter energy security, and to engage in substantive and necessary discussions with its regional stakeholders.”<sup>4</sup> To date, ISO-NE has introduced a design proposal that includes a multi-day-ahead market, a day-ahead and real-time energy market “energy inventory” constraint, and a

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<sup>1</sup> 18 C.F.R. § 385.211 (2018).

<sup>2</sup> The comments expressed herein represent those of NEPGA as an organization, but not necessarily those of any particular member.

<sup>3</sup> *Motion for Extension of Time of ISO New England Inc.*, Docket No. EL18-182-000 (filed Jan. 18, 2019) (“Motion”).

<sup>4</sup> *Id.* at 1.

forward market that settles against the energy market.<sup>5</sup> ISO-NE suggests that even with an extension to November 15, it will not have developed a forward market component, if at all, prior to filing the other design elements with the Commission. To seek Commission acceptance of a major design change in this piecemeal way would be inefficient and would deprive NEPOOL stakeholders of the ability to make a fully informed decision on the other design components. NEPGA therefore asks that the Commission, as a condition of granting the extension, order ISO-NE to ensure that all components of its proposal have been sufficiently developed and considered through the NEPOOL stakeholder process to permit stakeholders to understand the overall design prior to filing on November 15, 2019.

## **I. COMMENTS**

As ISO-NE recounts in its Motion, ISO-NE and NEPOOL stakeholders have been engaged in a discussion of ISO-NE's design proposal for several months. From the beginning of this process, ISO-NE has maintained that the overall design approach will include three components: (1) a multi-day ahead energy market; (2) an energy inventory constraint in the day-ahead and real-time energy markets; and (3) a forward/seasonal market.<sup>6</sup> The third element, the forward market, prompted the development of other forward market design proposals from two NEPGA Members. Each of the NEPGA Member proposals create a forward market structure

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<sup>5</sup> See Motion at 4.

<sup>6</sup> See ISO-NE Presentation *Winter Energy Security Improvements: Market-Based Approaches*, at 15, October 10, 2018, NEPOOL Markets Committee Meeting Materials, available at: [https://www.iso-ne.com/committees/markets/markets-committee/?open\\_projects\\_value=Winter%20Energy%20Security%20Improvements%20-%20WMPP%20ID:%20125](https://www.iso-ne.com/committees/markets/markets-committee/?open_projects_value=Winter%20Energy%20Security%20Improvements%20-%20WMPP%20ID:%20125).

pursuant to which eligible resources may take a forward position on the delivery of energy inventory during the winter months.

In its Motion, ISO-NE announces that even with the extension granted by the Commission, it will only have “discuss[ed]” the forward market component with NEPOOL stakeholders by November 15, and that the filing of the forward market piece “may lag” the November 15 filing (if that becomes the new filing deadline).<sup>7</sup> Though ISO-NE may rightfully explain that the design of a forward market component requires first the full development of the multi-day ahead energy market and energy inventory constraint components, it cannot likewise claim that the filing of two components of a design is an efficient or prudent process for a major market design change while any information on the third component “lags.” ISO-NE must give notice to NEPOOL stakeholders of sufficient details of all components of its ultimate proposal in the normal course of the NEPOOL process, even if the Tariff changes on that part of the design are not possible by November 15, 2019. Just as the forward market may not be developed until the energy market components have detail, NEPOOL stakeholders cannot make a fully informed decision on the overall design without first understanding all of its components.

NEPGA recognizes that ISO-NE and the NEPOOL stakeholders are working diligently to develop sound market designs within the time granted by the Commission, but without a full vetting of the overall design proposal it will be difficult if not impossible for NEPOOL stakeholders to make fully informed decisions on this very important matter. ISO-NE, NEPOOL stakeholder, and Commission resources will be put to better use if all possible components of a design are considered and fully vetted in the NEPOOL process prior to ISO-NE filing a design

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<sup>7</sup> Motion at 5, note 13.

proposal for Commission consideration. The four additional months, if granted, gives ISO-NE and NEPOOL stakeholders nearly ten months to further consider an overall design proposal. NEPGA submits that this provides ample time for ISO-NE to develop and for NEPOOL to consider a forward market component prior to ISO-NE filing. NEPGA thus supports ISO-NE's request for an extension until November 15, 2019, but asks the Commission in granting that request to require ISO-NE to file a design proposal that has been fully vetted through the NEPOOL process, including the consideration of a fully developed forward market component.

## **II. CONCLUSION**

NEPGA respectfully requests that the Commission grant ISO-NE's Motion for Extension of Time, with the condition that it vet a fully designed forward market component through the NEPOOL stakeholder process.

Respectfully Submitted,

/s/ Bruce Anderson

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the comments by via email upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Boston, Massachusetts, February 4, 2019.

/s/ Bruce Anderson

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