



## **Statement in Advance of the Second FERC Forum on Winter Reliability in New England**

We, the signers of this document, urge policymakers, ratepayer advocates, and the general public to raise their voices in support of a more holistic approach to grid planning and management at the upcoming second FERC Winter Reliability Forum to be held in Portland, Maine on June 20, 2023. We would like to see FERC encourage ISO New England to work with states and public interest organizations to envision a reliable grid that is also affordable and sustainable for all communities.

A holistic approach would entail a public, transparent and inclusive process that would culminate in an analysis of: 1) the contributions that transmission, demand-side solutions, and energy storage can make to reduce winter reliability concerns; 2) the public health and environmental impacts of current and future winter reliability policies and programs, including markets, on low-income environmental justice communities across New England. We hope that such findings would be presented publicly at a FERC technical forum in the near future.

### **Background**

In September 2022, FERC held its [first forum](#) in Burlington, VT to address gas and electric reliability concerns. One of the main concerns expressed was that in an extreme cold snap, natural gas power plants might be unable to produce adequate electricity on account of a shortfall in New England's limited gas supply from an overuse of this fuel by the heating sector (along with some other impediments to the natural gas supply chain from extreme cold). In addressing this concern historically, ISO-NE has implemented out-of-market solutions to winter reliability that do not articulate alternatives, cost, or trade-offs, including health and ecosystem impacts on low-income, environmental justice communities. Moreover, these decisions are often made in non-transparent ways. On top of this, existing ISO-NE market structures have preferenced existing fossil fuel generation and effectively subsidized fossil fuels, including natural gas, in our region through lopsided market rules for capacity accreditation and the minimum offer price rule, cost-of-service agreements and the inventoried energy program.

At the previous FERC forum, fossil fuel industry groups and other entities strongly advocated for a number of out-of-market handouts such as support for the Everett Marine Terminal (and by extension the preservation of the Mystic power plant), a regional fuel security reserve, compensation for acquiring sufficient fuel supply to meet capacity supply obligations, and even a call for expanding the pipeline to bring in more fracked gas from the Marcellus shale.

In the aftermath of that meeting, a coalition of public interest bodies, advocacy groups, and environmental and climate organizations requested FERC and ISO-NE to pay more attention to non-fossil fuel based solutions to winter reliability and adequacy needs. Specifically, they called for [a study](#) of the winter energy adequacy problem that includes specific attention to energy storage and demand-side resources such as energy efficiency, conservation, and demand response, as well as a technical conference or regional forum to discuss the results of this new study. They envisioned and proposed a detailed, transparent and collaborative study, and Commissioner

[Clements agreed](#) with the need for such a study at the first FERC forum. It should be noted that along with request from Commissioner Clements, there were also calls from the FERC chairman at the time Richard Glick, and various state representatives (including NESCOE managers) for a more holistic understanding and modeling of how non-fossil fuel interventions might be able to reduce the demand on the region's natural gas supply and ensure winter reliability in a cost effective manner. There was also a strong desire expressed to work across jurisdictions and partner with ISO-NE to see how we could mitigate this problem in a way that was both respectful of ratepayers and in line with New England states' decarbonization goals.

## Vision

While preliminary results of an EPRI study on extreme weather events provide some helpful insights, we are disappointed that a comprehensive study and earnest joint effort has not commenced, and are dismayed at the absence of public acknowledgement or consideration of these requests. Moreover, the [second FERC forum panel and speaker lineup](#) does not adequately address non fossil-fuel based possibilities that are already in practice in other parts of the country and the world. For example, it is worth remembering that [ISO-NE used to procure](#) additional demand response resources to meet winter reliability needs—such solutions should be considered if they can avoid exorbitant investments in new or retained fossil fuel infrastructure that disproportionately burden low income, environmental justice communities and will rapidly become obsolete.

While we acknowledge that direct implementation of some winter reliability solutions are under the purview of states and utilities, it is critical that ISO New England works with these parties to ensure that its programs and market rules complement and reward these efforts— rather than implementing redundant or ineffective programs paid for from consumer's pockets. FERC should use its convening power at the forum and beyond to encourage such integration to achieve reliability as well as alignment with federal and state policy goals. Many of the suggestions below for what we envision as part of the study are outlined in the [coalition white paper](#) **New England's Winter Electricity Challenges Call for a Clean Energy Solution** co-authored by Casey Roberts and Melissa Birchard; in addition, [the Applied Economics Clinic report](#) contains explanation and expansion of some of these points. A holistic study would focus on:

1. Aligning all new and existing regulatory frameworks with the Biden administration's "Executive Order on Revitalizing Our Nation's Commitment to Environmental Justice for All," which directs every federal agency to account for and minimize environmental health impacts on environmental justice and low-income communities
2. Aligning investments with the Biden Administration's Justice 40 initiative, which directs 40% of investments toward environmental justice and low-income communities.
3. Creating great incentives and implementation of residential, commercial and industrial demand response, and for cost-effective energy efficiency programs.
4. Incentivizing utilities to implement winter peaking incentives/cost structures as they currently do for summer peaking
5. Properly valuing clean energy storage for winter reliability and accounting for its operation when assessing winter risks

6. Supporting and valuing solar and wind energy where cost-effective as a piece of the winter energy puzzle
7. Assessing and adopting best practices from other ISOs for example CAISO's flex alert program
8. Ensuring reforms to the capacity accreditation system to correct previous undervaluing of renewable capacity and overvaluing of fossil fuels
9. Alleviating interconnection and permitting bottlenecks for renewables and clean energy storage
10. Encouraging regional cooperation and adoption of best practices for transmission planning and judicious expansion
11. Making sure that all points above and in such a study account for and minimize economic impacts on low income communities, including accounting for program accessibility

We urge you all as our representatives, elected officials, and advocates to continue to push FERC and the ISO-NE to conduct this study and adopt a more holistic approach to winter reliability at the FERC forum and beyond.

Signed,

The Fix the Grid Campaign

Campaign signers:

- 350 Massachusetts – Monte Pearson, Liaison to Fix-the-Grid
- 350 Massachusetts Berkshires – Susan Purser Coordinator
- 350 Massachusetts Newton – Peter Barrer, Leadership Team Member
- 350 Massachusetts South Shore – Steven Wenner, Co-Chair
- 350 New Hampshire – Kendra, Organizer
- Acadia Center – Joseph LaRusso, Manager of the Clean Grid Initiative
- Baird Farm – Jacob Powsner, Co-owner
- Berkshire Environmental Action Team – Jane Winn, Executive Director
- BLM860 and Good Trouble Advocates – Ivelisse, VP and Executive Director
- Breathe Clean North Shore – Susan Smoller, Co-Founder
- Brookhaven Residents' Climate Change Committee – Sallye Bleiberg, Chair, Advocacy Subcommittee
- Canton Residents for a Sustainable Equitable Futures – Jennifer Wexler, President
- Citizens' Climate Lobby Maine – Sarah Braik, Co-leader, Portland Chapter
- Citizens' Climate Lobby NH – John Gage, State Coordinator
- Climate Action Now (Western Mass) – Susan Theberge
- Climate Action Rhode Island – Abigail Huber, Vice President
- Climate Disobedience Center – Marla Marcum, Co-Founder and Director
- Climate Psychiatry Alliance – Robert Feder, M.D., Steering Committee
- ConcordCAN – Janet Rothrock, Leadership and Phil Thayer, Legislative Liaison
- Conservation Law Foundation – Phelps Turner, Senior Attorney
- CT Climate Crisis Mobilization – Ian McDonald, Steering Committee
- CT Coalition for Economic and Environmental Justice – Sharon Lewis, Director
- Earthjustice – Ada Statler, Associate Attorney
- Elders Climate Action Mass – Tina Grosowsky, Leadership
- Energy Allies – Yesenia Rivera, Executive Director
- Environmental League of Massachusetts – Susannah Hatch, Director of Clean Energy Policy
- Green Eco Warriors – Letecia Colon de Mejias, President
- GreenRoots – John Walkey, Director of Climate Justice & Waterfront Initiatives

- Jewish Climate Action Network – Marya Axner, Organizer
- King’s Chapel Environment Committee – Kent Wittenburg, Chair
- Massachusetts Climate Action Network – Logan Malik, Interim Executive Director
- Medical Society Consortium on Climate and Health – Robert Feder, M.D., Steering Committee
- National Wildlife Federation – Veronica Ung-Kono, Clean Energy Transmission Policy Specialist
- Natural Resources Defense Council, Jackson Morris, Director of Eastern Region Climate and Clean Energy
- NH Healthcare Workers for Climate Action – Paul Friedrichs MD, Board Chair
- NH Network for Environment, Energy and Climate – Susan Richman, Member of Steering Committee
- No Coal No Gas – Marla Marcum, Organizer
- No Fracked Gas in Mass – Rosemary Wessel, Program Director
- No More Dirty Power in Killingly – Kate Donnelly, Organizer
- Nonprofit Accountability Group – Tenaya Taylor, Executive Director
- Olin Climate Justice – Martin Gioannetti, Lead Organizer
- People's Action for Clean Energy – Peter Millman
- Renewable Energy Vermont – Peter Sterling, Executive Director
- Salem MA Democratic City Committee – Liz Bradt, Chair
- Sheffield Saves – Stephanie Blumenthal, Founder
- Sierra Club Connecticut – Samantha Dynowski, Chapter Director
- Sierra Club Maine – Matt Cannon, State Conservation and Energy Director
- Sierra Club Massachusetts – Jess Nahigian, Political Director
- Slingshot – Mireille Bejjani, Co-Executive Director
- Sustainable FERC Project – Christy Walsh, Director, Federal Energy Markets
- Union of Concerned Scientists – Susan Muller, Senior Energy Analyst
- Williamstown COOL Committee – Wendy Penner, Chairperson
- Windham-Willimantic NAACP Environmental Justice Committee – Roman Jamieson, Chairman