



**Comments of the American Clean Power Association¹
Interregional Planning Stakeholder Advisory Committee
January 8, 2021**

The American Clean Power Association (ACPA) appreciates the opportunity to provide comments on the December 2020 Interregional Planning Stakeholder Advisory Committee (IPSAC) meeting. Although the Federal Energy Regulatory Commission (FERC) has not yet issued a formal request for comments, or taken other action, from its October 27 Technical Conference on the integration of offshore wind into Regional Transmission Organizations and Independent System Operators (RTOs/ISOs),² ACPA believes that PJM, NYISO, and ISO-NE should proactively collaborate where possible to ensure the timely, efficient, and cost-effective integration of offshore wind on the East Coast.

States within the PJM, NYISO, and ISO-NE regions have committed to procure at least 29GW of offshore wind, and this figure continues to grow.³ Each of the projects needed to meet these state goals will have to be sited and permitted, and must interconnect to the onshore electrical grid. Already, we have seen offshore wind developers in existing lease areas with contracts to deliver power to more than one RTO/ISO. These conditions are likely to grow as the industry matures. More lease areas will likely be necessary to achieve the existing offshore wind generation requirements, and the location of these lease areas is not certain at this point. Because available capacity at points of interconnection is limited in many cases, ACPA urges PJM, NYISO, and ISO-NE to coordinate on studies where possible, and to ensure that the aggregate state goals can be

¹ On January 1, 2021, the American Wind Energy Association merged into the American Clean Power Association. See www.cleanpower.us for more information.

² See <https://www.ferc.gov/news-events/events/technical-conference-regarding-offshore-wind-integration-rtosisos-10272020>

³ See Massachusetts S. 2995 (2021) (increasing offshore wind procurement by 2400 MW; at the time of these comments, the bill has passed both chambers of the MA legislature, and will become law if Gov. Charlie Baker signs it), <https://malegislature.gov/Bills/191/S2995>.



attained as cost-effectively as possible. This will maximize customer benefits, allow necessary infrastructure to be developed as rapidly as possible, and ensure that the states whose utilities participate in PJM, NYISO, and ISO-NE can fulfill their respective clean energy obligations.

The IPSAC forum provides a valuable opportunity for the three regions to share transmission planning information that may affect the three interconnected systems, allowing for the identification of efficiencies and coordinated grid development where appropriate. Transmission planning to accommodate and integrate offshore wind – including both offshore lines and substations, as well as onshore upgrades – should be part of these discussions. ACPA urges PJM, NYISO, and ISO-NE to share information on planned studies, and to utilize common assumptions and adjacent state goals as well; ongoing and future studies can and should consider whether interregional coordination may be beneficial.⁴ Although interregional lines may not ultimately be appropriate for integration of all planned offshore wind resources, in many cases a shared point of interconnection may be viable, cost-effective, and provide for other operational efficiencies and reliability benefits through strengthening interties, geographic diversity, and dispatch options. Incorporating the potential for interregional transmission solutions will allow the three grid operators, the states, their utilities, and generation and transmission developers to properly plan for future offshore wind projects.

ACPA requests that in future transmission studies, PJM, NYISO, and ISO-NE attempt to account for both direct and indirect costs and benefits associated with transmission solutions that can serve more than one region. Direct costs and benefits could include aggregate transmission line development and upgrade costs (as well as potentially

⁴ See e.g. *PJM, New Jersey Collaborate to Advance State's Offshore Wind Goals Through Regional Planning Process* (Nov. 18, 2020), <https://www.pjm.com/-/media/about-pjm/newsroom/2020-releases/20201118-pjm-new-jersey-collaborate-to-advance-states-offshore-wind-goals-through-regional-planning-process.ashx>; 2019 ISO-NE Economic Studies, <https://www.iso-ne.com/system-planning/system-plans-studies/economic-studies/>.



avoided costs from interregional solutions, versus separate regional solutions) and the reliability benefits of additional transmission capacity in typically constrained areas; indirect costs and benefits could include potential dispatch savings and reduced curtailment from making wind energy available to more than one region (often with varying congestion levels and load profiles).

ACPA appreciates the efforts of each of the RTOs/ISOs on integration of offshore wind individually to date, and urges the use of IPSAC and other venues to support the proactive, cost-effective deployment of necessary transmission infrastructure. ACPA and our members will continue to provide input as the RTOs/ISOs and FERC move forward with their efforts to integrate significant quantities of offshore wind, and we look forward to continued engagement.

Sincerely,

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