

ISO New England Inc.
Preliminary Position Paper
Connecticut Task Force and Working Group on Transmission Projects

I. Executive Summary

Earlier this year, Governor Rowland and the Connecticut General Assembly imposed moratoriums on any new proposals for projects to cross Long Island Sound until June 2003 and on any approval of the proposed Bethel to Norwalk 345kV transmission line until February 1, 2003. In Executive Order No. 26 and Public Act 02-95 (PA 02-95, or “the Act”), the Governor and General Assembly established a Task Force and Working Group to examine the advantages and disadvantages of energy crossings of Long Island Sound and to review alternatives to the Bethel to Norwalk electric 345kV transmission proposal respectively. Both these groups were charged with preparing reports by a date certain for the Governor and the General Assembly’s review. Because the Governor and the General Assembly appointed ISO New England Inc. (“ISO-NE” or the “ISO”) as a member of both the Task Force and the Working Group, and pursuant to the request of the Task Force and Working Group mediator, ISO-NE herein respectfully submits its views on these initiatives.

The following preliminary position paper includes two sections. Section II provides an introduction to ISO-NE and background to this proceeding. Section III describes the ISO’s preliminary position with regard to the Working Group and Task Force initiatives.

Section III.A outlines principles for the Connecticut Task Force and Working Group to consider as they make decisions about both the content of the report as well as any specific recommendations to be made to the Governor and the General Assembly.

Section III.B provides an overview of the current process for electric system planning in New England. This is a process that has been established by the Federal Energy Regulatory Commission (“FERC”) and is embodied in the NEPOOL Open Access Transmission Tariff (“NOATT”). The NOATT represents the governing rules for all aspects of transmission service. Under the NOATT, the ISO is responsible for facilitation of a robust public stakeholder process and coordination and integration of resources and information with neighboring control areas, i.e., New York and Canada.

Section III.C provides ISO-NE’s review of PA 02-95 and Executive Order No. 26. ISO-NE selected key issues from both PA 02-95 and the Executive Order in which we are uniquely qualified to provide a response. These issues include interconnections to the New England power grid, a comparison of overhead and underground transmission lines and the potential for demand response resources.

Upon completion of the Working Group and Task Force’s review of the energy needs of the State of Connecticut, it is essential that the State take prompt measures to address the critical need that has been identified in southwest Connecticut (“SWCT”). In this regard, the ISO believes that the final report’s assessment of the state’s energy situation should appropriately build and rely on the ISO’s regional planning process (“RTEP”). (See Section III). The ISO is hopeful that the past two years of comprehensive and thorough analysis by ISO and public and private stakeholder review in the RTEP process examining the needs of New England generally and southwest Connecticut specifically will help expedite the State’s consideration of appropriate measures to secure a reliable energy future.

II. Introduction & Background

ISO-NE is a Delaware chartered, not-for-profit federal utility operating under a services agreement with the New England Power Pool (“NEPOOL”) and regulated by the FERC. Neither the ISO’s employees nor its Board of Directors have a financial interest in the wholesale electricity markets. Pursuant to the FERC’s policy, the ISO is charged with the reliable operation of the New England Power system, oversight of wholesale electricity markets in the New England region, administration of the regional open-access transmission tariff, and regional planning of the power system.

Governor Rowland and the General Assembly have named ISO-NE to the Task Force and Working Group established pursuant to Executive Order 26 and PA 02-95. We are pleased to provide our perspective on the planning and operation of the New England bulk power grid. Further, given our mission of providing - and safeguarding - reliable electric service, we view it as our responsibility to be actively engaged in any effort to examine and understand the provision of reliable and efficient electricity on the New England bulk power system.

Specifically, the Working Group is charged with studying underground versus overhead transmission lines in southwest Connecticut, studying the feasibility of meeting the region’s power needs with distributed generation, and studying the reliability, operational and safety concerns of the region’s transmission system. The Working Group is required to report on its findings and, if necessary, make legislative recommendations by January 1, 2003.

The Task Force is charged with producing a comprehensive environmental assessment and plan for Long Island Sound, evaluating ways to mitigate the number of energy crossings in Long Island Sound, and making recommendations for providing for regional energy needs while protecting Long Island Sound. The Task Force is required to report on its findings and recommendations by June 2003.

ISO-NE agrees with the Governor and the Legislature’s recognition that Southwest Connecticut is facing a serious energy problem that requires a comprehensive solution to ensure an adequate and reliable supply of electricity for the state and region. Further, ISO-NE is pleased that the Governor and other state and local officials have acknowledged that there are, in fact, areas in Connecticut where it has been determined that transmission must be sited.

The ISO is hopeful that the result of this process is that the State will implement, in prompt fashion, a robust and long-term strategy to help secure Connecticut’s energy future and contribute to a reliable and robust regional marketplace. It is critical that this effort, and any similar effort to establish other state-specific energy plans, recognize that states operate within a regional market with regional infrastructure.



III. Preliminary Positions

A. Principles for Task Force and Working Group Consideration

ISO-NE recommends these principles to the Task Force and Working Group:

1. Connecticut faces a serious energy problem today that requires the development and implementation of near-term and long-term solutions.

ISO-NE has found, through extensive engineering studies and first-hand operational experience, a serious energy infrastructure problem in southwest Connecticut. The fundamental problem is the inability of the transmission system to import power into southwest Connecticut and the inability of the system to reliably move power within southwest Connecticut. This situation threatens reliability of service and creates system congestion resulting in additional cost to consumers within the State.

2. Connecticut is part of an interconnected regional power grid and cannot be considered an energy “island.”

Since 1971, the six New England states have been part of an interconnected regional grid, which has evolved against a backdrop of cooperative, coordinated planning and operation. As such, Connecticut is integrated into the New England system. Simply, there is no stand-alone “Connecticut” electric grid. Underscoring this reality is the fact that Connecticut has been a net *importer* of electricity. Connecticut is interconnected with New York and has vital links in the operation of the Northeast Grid.

3. A regional power system must be planned and expanded on a regional basis.

The region’s power system is a resource to all of the states in New England. Regional power systems are designed to provide access to the most efficient resources available on the system, which also has the benefit of reducing the need for overall investment. Regional power systems also allow recovery from contingency events. When a resource within a state in New England is out of service, that state can draw upon the resources of the New England region to maintain electric service. That’s why the lights don’t go out in Connecticut when the Millstone units are offline, or when a transmission line in southwest Connecticut is out of service. The New England bulk power system must be planned and expanded on a regional basis because the system is comprised of interconnected transmission and generation resources that are *operated* on a regional basis. The ISO is responsible for system planning and expansion and performs this function on behalf of the region.

4. Continuous assessment of a dynamic power system is essential to identifying new needs, achieving appropriate and timely solutions and preventing system redundancy.

A comprehensive plan for Connecticut must recognize that the Region’s energy infrastructure is not static. To truly be an effective guide for appropriate solutions, an energy plan needs continuous assessment to reflect the most up-to-date system conditions, both in the state of Connecticut and throughout the region. This requires ongoing monitoring of the system and incorporating any modifications or updated assumptions for generation, transmission and demand. The ISO’s RTEP process is the most comprehensive ongoing, and iterative analysis of the regional power grid. It is this aspect of the process that provides for the most appropriate decisions and allows for timely implementation of needed solutions. Additionally it provides the most appropriate and accessible avenue for stakeholders

throughout New England to be informed and involved in the ongoing regional planning process. Any state energy planning effort or initiative should be coordinated with the discussion and activities of the RTEP process.

5. Connecticut needs to keep pace with growing energy demand in a restructured market.

Restructured wholesale electricity markets have attracted significant new, cleaner, more competitive sources of power. For many reasons, much of this new supply has not been sited near demand centers such as southwest Connecticut. The current transmission infrastructure is inadequate, resulting in increased costs and decreased reliability of service in southwest Connecticut.

Expanding the transmission system is not the only way to address the problem of congestion. Distributed generating resources located closer to the demand centers and demand response and reductions could serve the same purpose. The ISO's current RTEP report calls for both near-term and long-term solutions to the energy problems facing southwest Connecticut. Near-term solutions include transmission upgrades that increase power import capability and voltage support, and aggressive efforts to develop demand response in specified areas. The ISO also supports the current transmission proposal that would significantly expand the transmission backbone in SWCT as an effective long-term solution to the problem.

6. Connecticut's energy plan must be completed on time and prompt action taken thereafter.

It is important that the Task Force and the Working Group produce these reports consistent with the timetable established in the act to allow regulatory officials to proceed expeditiously with pending applications once the moratorium is lifted. While regional energy markets and federal energy policy may be in a state of transition, the reliability of electric service in southwest Connecticut is in jeopardy today and will worsen each year. To preserve reliability and appropriately meet the energy needs of the State, it is important that Connecticut move toward a decision on proposed energy infrastructure. The Working Group and Task Force play a critical role in the State's review of an appropriate solution to this matter.

B. Overview of Electric System Planning in New England

1. Effects of Restructuring

The changes brought about by electric industry restructuring – most notably utility divestiture of generating plants and load-serving responsibilities – have impacted the planning and operation of the regional power system. Simply stated, in much of New England, local utilities no longer own the generation needed to serve their load. The bulk power system was built under a regulatory structure that promoted the efficient serving of vertically integrated utilities’ native load. In the restructured environment, power transactions patterns have changed significantly and transmission congestion has increased on the power system. In some areas, this, coupled with the lack of investment in the generation and transmission infrastructure, has resulted in decreased reliability and the potential for increased costs. In September 2000, the FERC conveyed upon the ISO responsibility for a new system assessment and expansion process that would address the realities of the newly restructured marketplace.

2. Regional Transmission Expansion Plan (RTEP)

In its July 3, 2002 report on Southwest Connecticut, the DPUC observed that while “the responsibility of regulators and utilities has changed over the past few years with electric restructuring[,] [t]ransmission is still owned by the utilities but, planning is done by ISO-NE and is regulated by the [Federal Energy Regulatory Commission].”¹

This new system assessment and expansion process, called the Regional Transmission Expansion Plan, or “RTEP,” includes an on-going needs assessment of the bulk power system. The RTEP process provides an analysis of the reliability and economics of the power system and invites market solutions to identified reliability and congestion issues, including new generation, merchant and elective transmission, and demand (load) response. To the extent that the market does not adequately address system problems or needs, the RTEP process outlines a coordinated transmission plan that identifies needed projects for ensuring a reliable electric system and for reducing congestion. The RTEP coordinates planned market responses with needed reliability and economic upgrades. Ultimately, the RTEP seeks to promote a reliable, regional bulk electricity system that can support a robust marketplace, with due consideration given to environmental issues and concerns.

RTEP analyzes the New England system on a sub-regional basis, breaking the system into 13 transmission sub-areas that represent the physical system as well as more detailed “bus by bus” analysis, and beyond into PJM and Ontario. The RTEP includes analysis on an interregional basis, including neighboring New York, the Maritimes, and Quebec. (For example, Connecticut is represented by three distinct and separate sub-areas: “Nor-Stam”; “SWCT” and CT).² Using proven reliability and economic models, the RTEP assesses the state of the bulk transmission system in terms of reliability and economic congestion. Studies performed under the RTEP seek to explore, in detail, the problems identified within and between sub-areas, develop and review possible alternatives for feasibility and select the most effective solution. The work encompasses technical consideration of thermal, voltage and stability limits and system and equipment performance under a wide range of potential operating conditions. In fact, the RTEP process that uncovered the problems in SWCT also led to the comprehensive analysis of southwest Connecticut that included a very detailed look at that area.³

¹ Docket No. 02-04-12 DPUC Investigation into Possible Shortages of Electricity in Southwest Connecticut During the Summer Periods of Peak Demand, p. 35, July 3, 2002.

² See Attachment.

³ Southwestern Connecticut Reliability Study, Interim Report, January 2002

The RTEP process incorporates diverse stakeholder input from Market Participants, state regulators and other interested parties through the Transmission Expansion Advisory Committee, or TEAC. The ISO is required to consider and relies on TEAC input to produce its annual Regional Transmission Expansion Plan. The presentations made at TEAC meetings by ISO-NE along with the meeting minutes are available for review by the public on the ISO-NE web site. These meetings generally occur every 4-6 weeks and all Connecticut agencies are urged to participate. Presently, the DPUC and Office of Consumer Counsel attend regularly.

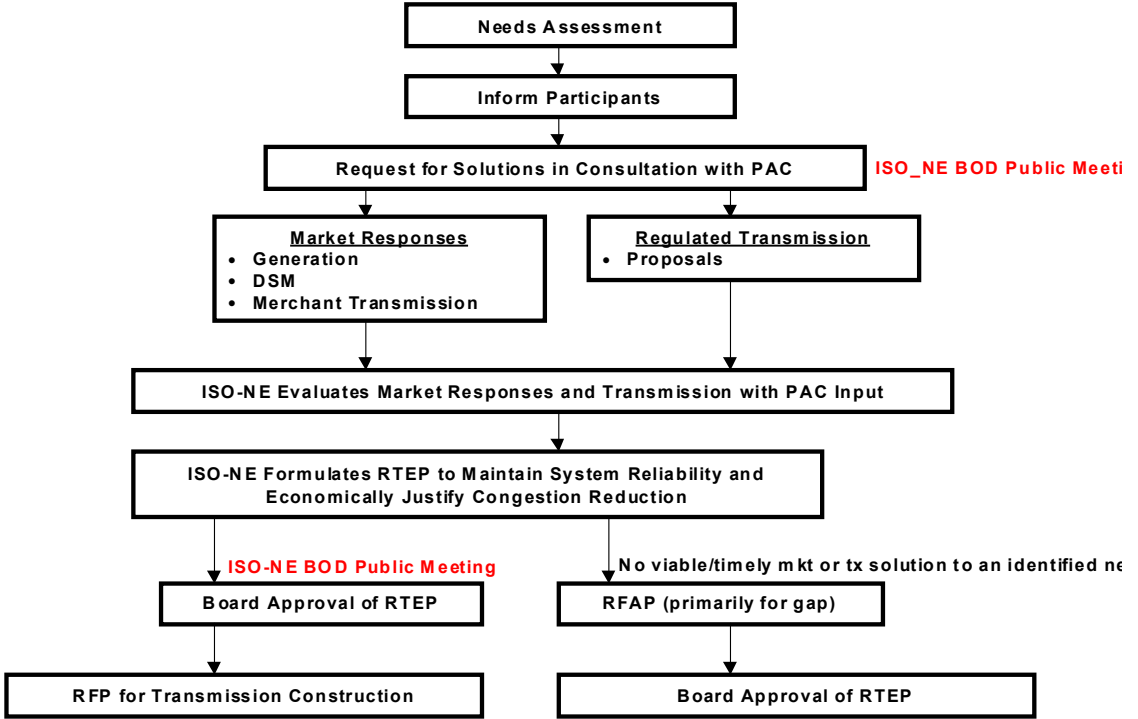
- **RTEP is an Ongoing Assessment**

The RTEP process continuously identifies the economic and reliability problems and evaluates a range of potential solutions in a comprehensive and integrated manner. The first issuance of the study, RTEP01, provided an assessment of the system that served as an initial “request for solutions” and as a status report of transmission planning studies. The development of RTEP02 reflects stakeholder and public input and continual updates to technical information and projected system conditions.

State-specific energy plans should recognize that electric energy flows by means of an interconnected regional power grid that does not recognize political boundaries. There is no “Connecticut” electric grid that is distinct from the New England electric grid. And because the RTEP process incorporates diverse and ongoing stakeholder input and review, the Working Group and Task Force recommendations should take into account and build upon the RTEP process as a comprehensive needs assessment and a timely identification of cost-effective transmission solutions.

The existing RTEP process is depicted below.

RTEP Process Flow



C. Review of PA 02-95 and Executive Order No. 26

1. Review of PA 02-95

PA 02-95 requires an evaluation of meeting the Region's energy needs that do not require the laying of a power line or cable within Long Island Sound (Section 3(C)). At the same time, the Act requires an evaluation of the reliability and operational impacts to the state and region presented by proposed crossings of Long Island Sound and an evaluation of the impact on reliability by limiting such crossings. (Section 3(F)).

In addition, PA 02-95 requires the Working Group to assess: (A) The economic considerations and environmental preferences and appropriateness of installing transmission lines underground or overhead; (B) the feasibility of meeting all or part of the electric power needs of the region through distributed generation; and (C) the electric reliability, operational and safety concerns of the region's transmission system and the technical and economic feasibility of addressing those concerns with currently available electric transmission system equipment.

Once a determination has been made that transmission is an appropriate solution for Connecticut, there are essentially two options: overhead and underground (including underwater) power lines or cables. The Task Force should consider that restricting cables in Long Island Sound could place additional pressure on the need for terrestrial routes for new transmission lines. Furthermore, as part of the interconnected network, the Long Island Sound crossing interconnections with New York provide benefits to Connecticut and the rest of New York.

a. Interconnections enhance reliability for a dynamic and integrated bulk power system.

New England has direct interconnections with New York, Quebec, and New Brunswick. Connecticut has four direct interconnections to New York. These tie lines enhance reliability and economy of operation, and they reduce the need for overall capital investment. In order to address effectively Connecticut's and the six-state region's energy needs, it is critically important to understand that the Northeast bulk power grid is dynamic and tightly integrated. This means that power naturally flows across state lines and the patterns of those flows can change depending on the availability of transmission lines and generation on any given day, the need to maintain transmission facilities and generating units, the operation of new transmission facilities and generating units, and the relative demand for electricity in any given state. As an example, on any given day, the Metro Boston area may receive electricity service from generators in Rhode Island, and as far away as Maine.

Therefore, while energy may flow to New York over cables crossing Long Island Sound, those cables also provide important reliability benefits for Connecticut energy users, especially when unexpected outages occur in Connecticut. ISO-NE coordinates the operation of these cables with the New York ISO, especially when reliability is jeopardized in New England or Connecticut. As the General Assembly recognized, the final energy plan must acknowledge that Connecticut is part of a regional electric grid.

For example, New England, Connecticut, and indeed, southwest Connecticut have been net importers of electricity, *i.e.* these sub-regions import more electricity than they export. As a result, while power is exported from Connecticut on many occasions, the Connecticut, Southwest Connecticut and Norwalk-Stamford RTEP sub-areas were net importers of electricity for the period June 2001 through May 2002. Southwest Connecticut must import power from other parts of the state, New England, and New York since there is insufficient generating capacity in the 52-town region to meet demand. More

generally, New England was a net importer of electricity over the external ties to New York and Canada for the same period.

Some have suggested during this process that a utility corridor be established within Long Island Sound, or that various transmission projects be consolidated. The Task Force should recognize the reliability benefits afforded by both large and small interconnections. ISO-NE recommends that careful consideration be given to the advantages and disadvantages of this corridor approach to transmission siting. In considering a single “corridor,” recognize there might be reliability benefits to diversified routes so that common outages aren’t a problem. This issue is recognized by Northeast Power Coordinating Council criteria that include consideration of loss of right-of-way (for overhead lines) as an extreme contingency.

There should also be recognition that routing cables between points within Connecticut might best be achieved via routes under Long Island Sound. A siting approach that objectively assesses alternatives would result in the most robust electrical solution with the least adverse environmental impact.

Interconnections allow for lower capacity investment, enhanced reliability, economic transfer, potential environmental benefits, and promote fuel diversity.

b. Analysis of overhead lines and underground cables raise reliability and cost considerations

From a planning perspective, the primary question in considering whether installation of underground (or underwater) cables is an appropriate transmission solution is whether any proposal to install underground cables appropriately address reliability criteria.

The secondary question is considering the implications of additional costs associated with construction and maintenance of underground lines. The application by Northeast Utilities Service Company for the construction of a 345-kV electric transmission line and reconstruction of an existing 115-kV electric transmission line between Bethel and Norwalk, Connecticut (Siting Council Docket 217) includes cost estimates for underground alternatives. The Task Force should recognize that the technology and the associated costs for installation and maintenance are different for underground transmission cables than for overhead transmission lines.

Connecticut operates within a regional energy market, and also within a regional transmission market, which is supported by the NOATT. Today’s transmission upgrade funding structure under the NOATT “regionalizes” the cost of reasonable and appropriate transmission upgrades, such as the one needed in southwest Connecticut, throughout the entire six state New England region. (For example, 1,600 miles of 345kV overhead lines already exist in New England, and 400 miles are in Connecticut alone).

Consideration of underground transmission cables therefore requires recognition of two factors that relate to allocating the costs of such cables. First, the NOATT does not recognize transmission facility “gold-plating,” *i.e.*, unnecessary expenditures, as appropriate for cost “regionalization.” Second, the FERC has expressed concern about whether “regionalization” of transmission facility upgrade costs is appropriate.

As a result, all of Connecticut could be subject to higher power costs if the State selects a preference for underground transmission lines. The costs associated with an underground cable could be localized in Connecticut rather than “regionalized” throughout New England under the rules of the

NOATT or through a change in the FERC's policy. (See NEPOOL Planning Procedure 4: Procedure for Determination of Cost Responsibilities of NEPOOL PTF Transmission Facility Upgrades or Additions.).

c. Promoting distributed generation and demand response represent sound energy policy.

As noted in Section III.B above, under the FERC-established NOATT, to the extent that the market does not adequately address system problems or needs, the RTEP process outlines a coordinated transmission plan that identifies needed projects for ensuring a reliable electric system and for reducing congestion. Distributed generation and demand response represent two such market solutions that can assist in a more reliably functioning power grid.

The Department of Environmental Protection, the agency responsible for issuing air emissions permits for distributed generating ("DG") units, testified before the Task Force that distributed generation is growing, in part, because businesses want greater reliability and power quality.⁴ Distributed generation may be part of the solution to meeting the energy needs of users within the region and should be considered as a resource for demand response. As a resource for demand response, distributed generation has the potential to provide the system operator with greater flexibility in operating the system during peak demand periods. As the DPUC has recognized, however, there are obvious barriers to distributed generation. ISO-NE recommends that the Task Force monitor the proceedings the DPUC plans for distributed generation interconnection.⁵

In RTEP02, the ISO recommended that State regulators "implement measures to promote distributed resource programs",⁶ including the use of DG. Installation of distributed generation and demand response, more generally, assist in creating a robust market for electricity through the ability of end users to reduce demand on the transmission system when transmission congestion, and therefore prices, are high.

Another of the key recommendations contained in RTEP02 is to "continue to promote effective Load Response Programs ("LRP") in New England, especially in the SWCT and Norwalk sub-areas, as well as other load pockets."⁷

The RTEP02 studied price-responsive demand side management ("DSM") in congested areas of the New England system, including the three Connecticut sub-areas and Boston. The study showed that the combined SWCT and NOR Sub-Areas experienced a substantial reliability improvement for modest reductions in demand. This underscores the significant impact that load reductions, i.e., LRP or DG, can have on improving reliability.

Conclusions from these two RTEP02 analyses indicate that LRP and DG can have a very significant benefit in terms of both reliability and savings in congestion costs. And while these resources will benefit the State, the ISO does not believe that they are presently a substitute for critical reliability areas, such as southwest Connecticut. Because of the lack of any significant market response and because of the inadequate transmission facilities in the region, until these resources can be installed in critical areas to provide the same degree of reliable and flexible service as transmission facilities, they should not be viewed as pure substitutes for transmission.

⁴ *Energy Issues Presentation*, Chris James, Connecticut DEP, Director Air Planning and Standards Division, July 18, 2002

⁵ Docket No. 02-04-12 Final Report, p. 33

⁶ 2002 Regional Transmission Expansion Plan (RTEP02), ISO New England, September 11, 2002, p. 15.

⁷ Ibid.

d. The ability of currently available equipment to serve reliability, operational and safety concerns.

There are numerous upgrades in progress on the bulk power grid that employ currently available electric transmission equipment. For example, Connecticut Light & Power is installing a FACTS dynamic voltage controller (“STATCOM”) at the Glenbrook Station in Stamford. The DPUC identified the limitations of such upgrades recently. The DPUC stated, “[w]hile upgrades to the Glenbrook Substation will improve voltage support they will not increase transmission import capability to the Norwalk - Stamford area.”⁸ The Task Force should recognize that while such upgrades do improve the performance of the system and therefore are always an appropriate alternative for analysis, they may not be sufficient to address transmission line loading operational limitations that, coupled with a lack of local supply, could be problematic.

e. Appropriate Legislative Changes

PA 02-95 states that the Working Group shall include legislative changes in its January 1, 2003 report. The Working Group has been asked by local officials to consider changing the rules governing the Connecticut Siting Council’s process for reviewing applications. (This issue was introduced at the May 17 organizational meeting and restated at the hearing in Norwalk.)

Officials from the Town of Norwalk have stated that the three phases contemplated by NU ought to be considered simultaneously by the Connecticut Siting Council. While these three projects may each affect Norwalk, they are in different stages of development and serve different purposes. Phase 1, which extends the 345 kV line from Bethel to Norwalk, is embodied in NU’s present application before the Siting Council (Docket 217). Phase 2 envisions extending the 345 kV line from Norwalk to Middletown. Phase 3 envisions a new tie to New York. Phases 1 and 2 are proposed for reliability purposes, while Phase 3 is a merchant transmission proposal and is not needed for reliability. Holding up the approval of an existing application until concept-stage projects are developed would *further delay needed transmission improvements* provided by earlier phase projects.

3. Review of Executive Order 26

Energy Crossings of Long Island Sound

Executive Order 26 calls for: (a) An evaluation of methods to minimize the numbers and impacts of energy crossings within Long Island Sound; (b) Recommendations for providing for regional energy needs while protecting Long Island Sound; (c) An assessment of the present status, future potential, and environmental impacts of proposed methods for laying of a power line, pipeline or cable; and (d) An identification of possible measures that may be taken to mitigate environmental impacts and maintain the aesthetic integrity of regions in Connecticut where it has been determined transmission must be sited.

It is important for the Task Force and the Working Group to recognize in formulating “recommendations for providing for regional energy needs” that Connecticut is part of an integrated regional power grid. Simply stated, there is no standalone “Connecticut” electric grid.

Other than the replacement of the existing cable from Norwalk to Northport (Long Island), NY, which is owned by Northeast Utilities and built into the Connecticut rate base, every proposal to construct a cable under Long Island Sound is proposed as a merchant transmission project by an independent market participant and would not be paid for by Connecticut ratepayers. Market participants are within

⁸ Docket No. 02-04-12 Final Report, p. 19

their rights to propose merchant transmission under the open access policy of the FERC established by Order 888.

Three companies have submitted eight different proposals to cross Long Island Sound and connect to the New England bulk power grid.⁹ These are merchant proposals to sell power across control areas and would function much like the existing tie lines to New York and Canada. ISO-NE's obligation for each proposal is limited to studying the feasibility of making the proposed interconnection to the New England system to support the operation of the line. ISO-NE does not have a process or the authority to assess the merits of one merchant transmission project versus another. That responsibility rests with Connecticut policymakers and the Connecticut Siting Council.

It is generally accepted that some of these are competing projects. Ultimately the marketplace and state regulators will decide which of these projects will go forward. (The "spaghetti" map of proposed projects, which has been on display at Task Force meetings, is only conceptual.)

IV. Conclusion & Impact of the Moratorium

It is important that the Task Force and the Working Group produce these reports consistent with the timetable established in the act to allow regulatory officials to proceed expeditiously with pending applications once the moratorium is lifted. This is important to enable Connecticut to move toward a decision on proposed energy infrastructure to preserve reliability and appropriately meet the energy needs of the State.

⁹ ISO-NE Interconnection Study Status: http://www.iso-ne.com/transmission_services_and_generation_interconnection/New_Interconnections/Interconnection_Study_Status.xls