



Via Electronic Submission

June 28, 2023

The Honorable Ned Lamont
Governor of Connecticut
State Capitol
210 Capitol Avenue
Hartford, CT 06106

The Honorable Janet Mills
Governor of Maine
State House
1 State House Station
Augusta, ME 04333

The Honorable Maura Healey
Governor of Massachusetts
Massachusetts State House
24 Beacon Street, Room 280
Boston, MA 02133

The Honorable Christopher T. Sununu
Governor of New Hampshire
State House
107 North Main Street
Concord, NH 03301

The Honorable Daniel J. McKee
Governor of Rhode Island
State House
82 Smith Street
Providence, RI, 02903

The Honorable Philip B. Scott
Governor of Vermont
State House
109 State Street, Pavilion
Montpelier, VT 05609

Dear Governors,

When it comes to energy, we share many of the same goals: More affordable energy. More reliable energy. More clean energy. And more jobs.

And, like you, we know that all those goals rely on addressing the increasingly urgent transmission needs of the region. We appreciate your leadership to date, and we are writing today to urge you to continue working together as a region to forge long-term solutions that set forth a holistic, comprehensive approach to the transmission challenges we face. We've created a playbook with six essential elements to help you prioritize benefits across states and actually deploy new infrastructure. You'll find those details on the next page.

First, a bit of background: Advanced Energy United ("United") is the only national industry association that represents the full range of advanced energy technologies and services, including wind, solar, hydro, electric vehicles, grid enhancing technologies, and more. The businesses we represent are lowering consumer costs, creating good-paying jobs, and provide the full range of clean, cost-effective, and reliable energy and transportation solutions.

A reliable, resilient, and modern energy system hinges on having a robust, dynamic, and efficient transmission grid. We can—and must—build the grid of the future in an efficient, lower

cost manner that maximizes benefits to all states and meets the region’s urgent need for equitable infrastructure investment.

Because there is an undeniable urgency and transmission development processes often take a decade or more, time is of the essence. We’ve outlined six critical elements that the region must deliver in a new playbook below. We hope to work together with you to make each of these actions a reality:

Six Essential Elements to Build a 21st Century Energy Grid

- 1. Demonstrate Executive Leadership.** As governors, your leadership is critical to set the direction and create the political will to drive this effort forward. We urge you to publicly announce a joint vision for transmission execution. Here’s how:
 - Come together to issue a joint statement that builds off the [2020 Vision Statement](#) and [recent six-state update](#)¹ to commit to a sustained, collaborative effort to develop an actionable transmission strategy across the region and an aggressive timeline for submission to the appropriate regulatory bodies.
 - This could look like a memorandum of understanding or other public declaration.
 - This statement should: (a) establish a target of tripling the transmission capacity for clean energy in the region and cutting the development timeline for interstate transmission projects by half; (b) create a ten-year commitment to sufficiently resource and staff state energy offices and commissions to meet these goals; and (c) require annual reporting.
- 2. Pursue a Holistic, Region-wide Approach.** The New England states, working with ISO New England and a broad set of stakeholders, should immediately boost existing actions² to incorporate existing planning efforts across the region. Here’s how:
 - Leverage ISO-NE’s notable [2050 Transmission Planning Effort](#) to roll up all transmission-related data into a comprehensive set of transmission strategies that meet the region’s needs over the short, medium and long term.
 - The compilation states create should include an evaluation of a broad range of solutions, including grid enhancing technologies (“GETS”) and reconductoring to proactively reduce congestion and integrate clean resources.
 - This holistic approach should be ambitious and account for multiple system needs including increased demand from electrification and increased generation of distributed and large-scale zero-carbon resources on land and offshore, in New England and in neighboring regional transmission organizations.³

¹ See NESCOE, “Update on Multi-State Transmission Activities,” (June 22, 2023).

² See *id.*

³ Advanced Energy United applauds the New England states, along with New York and New Jersey, for proposing a Northeast States Collaborative on Interregional Transmission. This is precisely the type of holistic perspective that is necessary. See letter from Northeast States to U.S. Dept. of Energy, Grid Deployment Office (June 16, 2023).



3. **Establish a Durable Cost Allocation Framework.** Working together, the states should establish a cost-allocation framework for projects by the end of this summer. An agreed-upon cost-sharing framework will ensure the benefits of transmission investments to each state, the region, and interregional connection are roughly commensurate with the cost of investment. Here's how:
 - In its recent update, the New England States Committee on Electricity (“NESCOE”) noted that the “states plan to advance a consensus cost-sharing approach” for competitive transmission project this summer. It is essential that the states *establish* such a cost-sharing approach, not just *advance* one. This will create a big-picture approach that will minimize project-by-project negotiations and ensure that states are accounting for the overall benefits of the set of projects.
 - Federal resources should be pursued at every opportunity to defray ratepayer impacts and remove additional obstacles.
 - While cost allocation for regional projects will be hotly debated, the cost allocation framework should reduce friction and it is essential that all affected states are at the table to discuss the collective need for expanded transmission infrastructure within the region, a process that has already begun through the [New England States Transmission Initiative](#).
 - We are encouraged by the identification of cost allocation needs by the NESCOE update and urge you to commit to reaching a cost-sharing agreement by the end of this summer.

4. **Maximize Competition.** A collaborative approach will reduce costs and ensure that projects get built. Harnessing competition means driving costs down and allowing for creativity in meeting the region's transmission needs. Here's how:
 - The states, working with ISO New England, must determine procurement strategies to maximize competition, economic development, and job creation.
 - New England has a proud history of using competitive solicitations to solve complex energy issues. Let's use that experience here. We are pleased that NESCOE's recent update⁴ contemplates an ISO New England-administered competitive process of transmission procurement. We encourage the states to develop a concrete, coordinated, and accelerated schedule of regional procurements that begin in early 2024.

5. **Deploy Technology and Existing Footprints.** Costs should be minimized, and efficiencies maximized. Here's how:
 - Use technology, reconductoring, and other transmission technologies.
 - Additional barriers should be mitigated using existing rights of way. This will maximize the utility of existing infrastructure and reduce siting and permitting pressures.

⁴ See [supra](#), n. 1.



- Deploying strategies that use existing transmission corridors will help avoid capital costs of local resources, render resource adequacy savings, decarbonization, and ameliorate the risk of load shedding.

6. **Develop Proactive, Meaningful Community Engagement.** Under this effort, extensive community engagement strategies should be developed. Here's how:

- Bring together a broad set of stakeholders, including environmental justice communities and advocates, to develop a community engagement plan.
- Emphasis should be on early and two-way engagement with potentially affected communities that provide options and tradeoffs of different approaches.

The time is now for New England to take charge of its energy future by adopting a comprehensive, proactive, no-regrets strategy to deploy grid transmission infrastructure that prioritizes action across a portfolio of projects to the benefit of each state and the region's collective interests. United and its members continue to engage with your respective teams, and we stand ready to assist in advancing this playbook to meet our growing transmission needs. Together, we can create the regional grid that we need and deserve in a way that is coordinated, provides benefits across the region, and places New England in a competitive position in an increasingly electricity-driven 21st Century economy.

Sincerely,



Heather O'Neill
CEO and President



Jeremy McDiarmid
Managing Director

cc: Commissioner Katie Dykes, Connecticut Dept. of Energy & Environmental Protection
Director Dan Burgess, Maine Governor's Energy Office
Secretary Rebecca Tepper, Mass. Exec. Office of Energy and Environmental Affairs
Commissioner Jared Chicoine, New Hampshire Department of Energy
Acting Commissioner Chris Kearns, Rhode Island Office of Energy Resources
Commissioner June Tierney, Vermont Department of Public Service

