

August 1, 2023

Robert Ludlow
Chief Financial Officer
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040

Re: Request to Create an Executive-Level Environmental Justice Position at ISO New England (ISO-NE)

Dear Mr. Ludlow:

Thank you for your June 23, 2023 briefing to the New England states on ISO-NE's preliminary operating and capital budgets for 2024 and 2025.¹ We appreciate the opportunity to provide feedback at this early stage of the budget process. We also appreciate ISO-NE's focus on ensuring that it has the necessary personnel to support New England's clean energy transition. We understand ISO-NE's challenge in attracting and retaining a qualified and skilled workforce, including those with technical expertise in areas that are in high demand. While we are still reviewing the budget materials and are awaiting additional materials later this summer, we are interested in supporting investments to achieve a clean regional power grid that is reliable, affordable, and equitable.

At the June 23 briefing, a state official advocated for ISO-NE to include in its budget the creation of a dedicated, executive-level position focusing on energy and environmental justice (EJ) to align ISO-NE's organizational objectives and operations with a just and equitable clean energy transition. You asked for more information and definition regarding the proposed position. This communication responds to that request.

Below is a preliminary, and non-exhaustive, list of the responsibilities and functions that the executive-level EJ position could carry out. At the highest level, this position would provide an EJ and equity lens to ISO-NE's management and staff, inform the development of ISO-NE initiatives, rules, and operations, and engage EJ communities and stakeholders.

Responsibilities for this position could include, but would not be limited to the following:

- Advise the ISO-NE Board of Directors and senior management on (i) the relationship and intersection of ISO-NE market rules, transmission planning, and operations on EJ communities, as defined by each state, and state and federal laws and policies related to EJ, and (ii) procedures, rule changes, and other actions needed to integrate EJ priorities into ISO-NE's day-to-day work and corporate strategies.
- Establish and foster relationships with EJ communities and stakeholders and serve as an external resource on EJ, including establishing processes for engaging with EJ communities, ensuring that ISO-NE practices consider the perspectives of EJ

¹ ISO New England, *2024 and 2025 Preliminary Operating and Capital Budgets: Briefing for New England States*, June 23, 2023.

communities, and making technical information accessible and understandable to broader audiences.

- Coordinate across ISO-NE internal teams and working groups on understanding EJ principles and incorporating EJ principles into ISO-NE programs, initiatives, and the development of rules and practices.
- Develop and facilitate internal trainings and workshops on meaningful engagement of EJ communities.
- Coordinate with regional partners on cross-state collaboration and implementation of EJ principles.
- Develop tracking systems and mechanisms to ensure accountability in incorporating energy and EJ principles into ISO-NE corporate strategies, programs, initiatives, and development of rules and practices.
- Communicate with the public about ISO-NE's progress on integrating EJ principles into its strategies, programs, initiatives, rules, and practices.

As community engagement and responsibilities grow, this executive position could build out and manage additional team members providing EJ expertise to ISO-NE and enhancing community, government, and industry engagement. We welcome further discussion on the possible scope of responsibilities for the role and note that consultation with others, including and especially EJ communities and stakeholders, is critical in informing the duties and functions of this position.

* * *

There is a gap in ISO-NE's budget proposal and its current management team without a position reflecting EJ experience and the skillset described above. ISO-NE's budget presentation accurately states: "Urgency around the transition to clean energy will increase, leading to a greater focus on ISO actions and the need for more and different types of public and regulatory engagement."² A successful clean energy transition cannot happen without community engagement and a meaningful role for EJ communities in helping to shape decisions that impact wholesale power and transmission rates and affect how the benefits and burdens of our electric system are apportioned. Creating this position would serve as a critical bridge from ISO-NE to the communities it serves.

ISO-NE's regulator, the Federal Energy Regulatory Commission (FERC), has emphasized the need to prioritize environmental justice. For example, Chairman Willie Phillips has led efforts at FERC to hire the first Senior Counsel for Environmental Justice and Equity and, earlier this year, hosted FERC's first Roundtable on Environmental Justice and Equity in Infrastructure Permitting.³ Chairman Phillips recently testified to Congress that it is his "goal as Chairman to do all that we reasonably can to ensure that environmental justice communities affected by [FERC's] decisions do not bear too great a share of the burdens or too small a share of the benefits that new energy infrastructure can provide."⁴

² *Id.* at Slide 19.

³ Testimony of Chairman Willie Phillips, Federal Energy Regulatory Commission, Senate Energy and Natural Resources Committee, May 4, 2023, at 3.

⁴ *Id.*

We understand that if ISO-NE creates a dedicated EJ position, it may be the only independent system operator or regional transmission organization in the country that has established such a role. We encourage ISO-NE to be first in this critical area. Thank you for your consideration, and we look forward to continuing discussion on this and other budget priorities.

Sincerely,

/s/ Jason Marshall
Jason Marshall
Deputy Secretary for Federal and Regional
Energy Affairs
Massachusetts Executive Office of Energy and
Environmental Affairs

/s/ James M. Van Nostrand
James M. Van Nostrand
Chair
Massachusetts Department of Public Utilities

/s/ Cecile M. Fraser
Cecile M. Fraser
Commissioner
Massachusetts Department of Public Utilities

/s/ Anthony Z. Roisman
Anthony Z. Roisman
Chair
Vermont Public Utility Commission

/s/ Riley Allen
Riley Allen
Commissioner
Vermont Public Utility Commission

/s/ Katie Dykes
Katie Dykes
Commissioner
Connecticut Department of
Energy & Environmental Protection

/s/ María Belén Power
María Belén Power
Undersecretary of Environmental Justice
and Equity
Massachusetts Executive Office of Energy
and Environmental Affairs

/s/ Staci Rubin
Staci Rubin
Commissioner
Massachusetts Department of Public
Utilities

/s/ June E. Tierney
June E. Tierney
Commissioner
Vermont Department of Public Service

/s/ Margaret Cheney
Margaret Cheney
Commissioner
Vermont Public Utility Commission

/s/ Christopher Kearns
Christopher Kearns
Acting Commissioner
State of Rhode Island Office of Energy
Resources

/s/ Marissa Gillett
Marissa Gillett
Chair
Connecticut Public Utilities Regulatory
Authority

/s/ Phil Bartlett _____

Phil Bartlett
Chair
Maine Public Utilities Commission

/s/ Carolyn Gilbert _____

Carolyn Gilbert
Commissioner
Maine Public Utilities Commission