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FERC/Federal News



FERC Permits Elliott Purchase of up to 20% of NRG Stock amid NOI

By Amanda Durish Cook

While an inspection into its approval process plays out, FERC has allowed another investment firm to purchase a sizable chunk of a public utility.

With Jan. 8's decision, New York-based Elliott Investment Management is free to bump up its current 2.36% ownership of NRG Energy common stock to a maximum 20% through direct or indirect purchases (*EC23-112*).

FERC allowed the transaction over extensive protest from Public Citizen, which warned that the investment firm was seeking to control the utility. Elliott said it eventually may exercise voting rights depending on NRG's financial and operation performance.

The approval follows FERC initiating a Notice of Inquiry last month on its practice of issuing blanket authorizations for investment companies seeking a stake in public utilities. (See [FERC Reconsidering Blanket Authorizations for Investment Companies](#).)

In this case, FERC said the transaction won't harm competition because Elliott doesn't currently own or control generation in the markets where NRG operates. The commission also noted that the transaction doesn't involve any handover of generation facilities and doesn't disturb market concentration or operational control.

Elliott does, however, own a 15% ownership interest in Peabody Energy Corp., which supplies coal to some NRG plants in PJM and ERCOT. Elliott pledged that it doesn't involve itself in Peabody's day-to-day operations.

Public Citizen protested that assertion. The group pointed out that two Elliott executives, Samantha Algaze and Dave Miller, serve on Peabody's board of directors. Public Citizen argued that Peabody's management is "directly accountable" to the board and that board members have "unfettered access to influence management."

Nevertheless, FERC rejected Public Citizen's request for a hearing to probe how Peabody's coal supply contracts with NRG would affect competition.

The Elliott executives included sworn affidavits that they do not oversee Peabody's day-to-day operations, nor do they set pricing, negotiate contracts with customers or "seek to influence Peabody management decisions concerning to whom or what Peabody sells coal or the markets in which they sell coal."



| NRG Energy

Public Citizen further argued that FERC couldn't authorize the deal because it couldn't allow Elliott executives to simultaneously serve on the NRG and Peabody boards. That would violate the Clayton Act, the organization reasoned.

Elliott argued that FERC is not tasked with enforcing the Clayton Act and that Peabody isn't a competitor of NRG because it doesn't mine coal.

FERC said Elliott's board control and representation at either Peabody or NRG was "irrelevant" to its evaluation of the transaction. It also agreed that its jurisdiction doesn't extend to Clayton Act enforcement.

Additionally, Public Citizen said it was troubled that prior to seeking FERC approval, Elliott attained indirect control of more than 10% of NRG through acquiring derivatives that "likely convey indirect voting control." It said the Securities and Exchange Commission is similarly uneasy over the use of derivatives to covertly control public companies and has proposed a rulemaking to treat holders of cash-settled derivatives as owners for reporting purposes.

Public Citizen claimed that Elliott has a history of acquiring derivatives to "amplify their indirect control over a target company." The consumer group said Elliott follows a playbook of using their economic interests to exert corporate control and then switch out board members and executives. Public Citizen said Elliott's use of derivatives to control voting rights means Elliott meets FERC's definition of an affiliate company.

FERC, however, decided it wouldn't address the allegations of investor activism. It also said any existing affiliation between Elliott and NRG wouldn't affect its competition analysis. FERC said though it wasn't making a finding of affiliation now, it wasn't foreclosing on the possibility of determining it later.

Elliott said Public Citizen's concerns were "speculative" and its use of derivatives "merely [confers] economic interest and [does] not permit the holder to 'force' any change at

such companies."

Public Citizen warned FERC that "this is a proceeding of first impression for the commission, and therefore requires careful consideration, as it will likely establish precedent for both hostile takeovers of public utilities and affiliation treatment of cash-settled swaps."

It said FERC should curb Elliott's ability to enter into cooperation agreements and ban it from appointing board members at other public utilities. Public Citizen alleged that "at least once a year," Elliott appears to scoop up direct and indirect interests in jurisdictional utilities and then pressure personnel and investment changes. The group said cooperation agreements allow Elliott access to nonpublic material of other utilities while simultaneously serving as a de facto affiliate of NRG, posing a risk to competition.

Public Citizen asked FERC to force Elliott to disclose how many arrangements it has with utilities and limit its ability to enter into future cooperation agreements.

Finally, Public Citizen further alleged that Elliott is collaborating with Bluescape Energy Partners to force operational changes at NRG. It said Bluescape and Elliott have enjoyed "a yearslong relationship of successfully conspiring to bend target companies to their demands." According to Public Citizen, this is the sixth time Elliott and Bluescape have "joined an effort to usurp management of a public utility without first securing" a FERC order through a combination of cash-settled derivatives, acquisition of NRG stock and coordination with Bluescape.

FERC said any possible collusion with Bluescape was beyond the scope of the proceeding.

[Commissioner Mark Christie](#) said though he concurred with FERC's decision to allow the stock purchase, Public Citizen's allegations regarding Elliott and its investments in public utilities are of interest to the commission.

"To that end, in future proceedings, interested entities should continue to file information they believe may be of interest to the commission in its review, including, as Public Citizen has done here, information regarding investment practices in jurisdictional utilities commenters believe may suggest indicia of influence as they relate to affiliation and control," Christie wrote.

He said such information on investment firm behavior led FERC to publish the notice of inquiry on its policy in the first place. ■

FERC/Federal News



FERC's Clements Gets GETs' Benefits to Grid

Grid-enhancing Technologies Inexpensive Way to Free Up Capacity

By Tom Kleckner

AUSTIN, Texas — FERC Commissioner Allison Clements is no rock star, but observing her appearances during a gathering of federal and state regulators last summer, you might be mistaken.

Heads turned as she entered a large conference room with several of her staffers, taking a front-row seat

for a National Association of Regulatory Utility Commissioners' discussion on grid-enhancing technologies (GETs). Attendees whispered and nodded in Clements' direction. Some regulators approached her. Others gave her space.

Asked if the attention makes her feel like she's in the same orbit with Mick Jagger or Bruce Springsteen, Clements breaks into a smile and turns toward one of her staffers.

"Well, I like to go see rock stars," she answered, noting she did catch Western swing band Asleep at the Wheel's performance the night before.

Her day job does take precedence, however. From the moment she joined FERC in 2020, Clements has focused her energy on GETs, such as sensors, power flow control devices and analytical tools that maximize the existing transmission grid. She has taken a key role in helping FERC establish the appropriate incentive mechanisms for the technologies' adoption.

Clements earnestly watched the discussion during the NARUC summit. Offered a chance to comment, she stressed the importance of financial incentives to help utilities roll out GETs and said it's important to dispel the "myth" that GETs are rife with risks when deployed.

"The existence of those risks shouldn't stop us from starting to require consideration of deployment, and certainly the many cases we've heard so far about entities that have used dynamic line ratings to the benefit of customers have found ways to manage those," she said. (See [FERC-state Transmission Task Force Examines Barriers to GETs](#).)



FERC Commissioner Allison Clements listens to a discussion on grid-enhancing technologies. | © RTO Insider LLC

And then there are the *economic benefits*.

"As I spoke with providers of grid-enhancing technologies and learned anecdotally the amount of savings that people were getting ... as well as the amount of capacity they were freeing up on the system, it was a no-brainer to me," Clements said. "The light bulb went on and I said, 'You can't stand up as an economic regulator on behalf of customers if you don't try and squeeze the savings out of the existing system that has already been paid for.'"

"The cost of these investments are so modest relative to alternatives that they're an excellent complement to the development of the transmission system," she added. "They can't replace the need to modernize our system with new transmission, but certainly they're an important complement to that investment."

During FERC's July monthly meeting, Clements referred to a Grid Strategies [report](#) estimating that congestion cost the country about \$20.8 billion in 2022, up \$14 billion since 2020. She also mentioned a Brattle Group [white paper](#) that says using GETs to unlock additional capacity on the grid would save customers \$8.3 billion.

She says GETs are a topic "that was once relegated to small windowless conference rooms full of energy grid geeks," but are now "front of mind" in big rooms before the nation's regulators.

"GETs will be a win for customers, and states are taking notice," she said in July. Recalling NARUC's discussion of the technologies, Clements added, "My team and I had fun brainstorming technology that came after some of the early GETs, like the floppy disk and the Walkman. Today, utilities around the world have proven experience and results.

"I came away with the sense that the regulators, as a group, are open to more systematic deployment of these GETs solutions and I look forward to working with them."

Noting that part of an engineer's job description is to be conservative when it comes to reliability, Clements said it's incumbent on regulators to align financial incentives to encourage the risks of using GETs.

"[Regulators] don't have to attach a synchrophasor to every line, but to start getting comfortable and educating and understanding their benefits and limitations," she said.

Clements cited as an example PPL Electric Utilities and PJM using a dynamic line rating (DLR) solution to resolve congestion on two transmission lines. She said they spent \$500,000 on one line and avoided a \$12 million reconductoring. PPL and PJM spent several million dollars on the two lines, which have saved more than \$23 million annually, exceeding projections. (See [Grid-enhancing Technologies Poised for Growth with Federal Funds](#).)

FERC has responded with several initiatives to help facilitate GETs' deployment. In July, the commission approved [Order 1023](#), which reforms interconnection procedures and included language requiring transmission providers, upon an interconnection customer's request, to consider DLRs, advanced power flow control, transmission switching, and static synchronous compensators and VAR (Volt-Amps reactive) in their studies.

"It's a great start for grid-enhancing technologies, or as the rule calls them, alternative transmission technologies," Clements said during FERC's July meeting. "The rule's requirement sets only a low bar: 'evaluation' of these technologies. I encourage utilities and grid operators to embrace the opportunity this rule provides, learn more about how to grow your consideration and deployment of these grid-enhancing technologies, and share your learning with your neighbors."

The commission has opened a DLR inquiry ([AD22-5](#)) to examine whether their use would help ensure just and reasonable wholesale rates by improving the accuracy and transparency of line ratings. It also has a proposed rulemaking ([RM21-17](#)) that mandates DLRs and advanced power flow control devices be more "fully" considered in regional transmission planning processes.

"I would love to see all those things get done," Clements said. "Grid-enhancing technologies happily provide that modest investment cost. The return on investment is a fraction of the time of a traditional infrastructure expenditure. And they're dynamic, they're modular, you can move them, you can use them where they work. There's just a lot of options to make the grid smarter. The numbers are striking. The dollar savings are striking." ■

CAISO/West News

Oregon RA Rules Could Favor WRAP Participation

By Elaine Goodman

Oregon regulators are moving closer to adopting resource adequacy rules that would incentivize load-serving entities to join the Western Power Pool's WRAP.

But during an Oregon Public Utility Commission rulemaking *hearing* Jan. 11, stakeholders continued to debate transmission forward-showing requirements and the need to allow a capacity backstop charge.

OPUC filed the proposed *resource adequacy rules* in September, following an informal process that began in December 2020.

OPUC staff contend that "resource adequacy concerns are best addressed through regional coordination," Curtis Dlouhy, senior economist and policy analyst with the agency, said during the hearing. In particular, Western Power Pool (WPP) offers the Western Resource Adequacy Program (WRAP), the West's first regional reliability planning and compliance program.

FERC approved the WRAP tariff in February. (See *FERC Approves Western Resource Adequacy Program*.)

OPUC's proposed rule would incentivize WRAP participation by including more stringent resource adequacy planning for those not involved with WRAP, Dlouhy said.

OPUC-regulated entities that are not WRAP participants would face a two-year forward-showing requirement for resource adequacy. In contrast, WRAP participants must submit resource adequacy forward showings seven months ahead of a season. WPP then evaluates the submission to ensure the participant is meeting its share of the WRAP planning reserve margin.

"Entities not attached to a regional program have a greater resource adequacy risk and thus should be subject to uniformly stricter requirements," Dlouhy said.

"Staff also believes that requirements consistent with WRAP, albeit stricter, provide a clear incentive to join WRAP and thus benefit from a diverse set of energy producers that are involved in WRAP," he added.

Capacity Backstop Discussed

The proposed resource adequacy rules would apply to two types of load-serving entities: investor-owned utilities (IOUs) and electric service suppliers (ESSs). Oregon's Direct Ac-



Wind turbines on Oregon's Columbia Plateau. | © RTO Insider LLC

cess program allows nonresidential consumers to buy electricity from an OPUC-certified ESS.

In written comments, the Northwest & Intermountain Power Producers Coalition (NIPPC) said the commission should give ESSs the option to meet their resource adequacy obligations through a capacity backstop charge. Under that option, direct access customers would pay an RA charge to the utility.

In addition, NIPPC wrote, WRAP's firm transmission requirement is "very problematic" and shouldn't be mandatory. NIPPC represents competitive electricity market participants, including ESSs.

During the hearing, Greg Adams, representing Calpine Energy Solutions, said that WRAP "requires a real shift in regional transmission practices toward advanced procurement of firm transmission."

That's an issue, Adams said, because of Bonneville Power Administration's current practice of releasing substantial transmission for purchase less than seven months ahead of delivery.

"There is significant concern with the ability of all load-responsible entities to meet the WRAP's forward-showing transmission requirement, given the general ... inability to obtain incremental, firm, point-to-point Bonneville Power Administration transmission in the forward-showing timeline — seven months in advance of the time of delivery," Adams said.

'Equal Playing Field'

But Pam Sporborg, director of transmission and market services at Portland General Electric (PGE), noted that under FERC's open

access policy, "all entities are on an equal playing field when it comes to acquiring transmission rights." She said it was unclear what was preventing direct-access LSEs from procuring long-term, firm transmission.

"We do recognize that procuring long-term, firm transmission on an annual basis ... can be more expensive," Sporborg said. "But we believe that this is a necessary investment to provide really reliable load service."

As for the capacity backstop charge, PGE's Sam Newman said the utility had concerns.

"We are very uncomfortable with a scenario where the utilities are required to offer a backstop charge, but as a backstop charge there would be considerable flexibility for direct access load to choose or not choose to lean on that charge," Newman said. "That puts the utilities in a difficult position."

Dlouhy with OPUC said there aren't currently plans to include a capacity backstop charge in the resource adequacy rules, although that could be reevaluated later. He said the rules would be able to function without it.

"Staff was not confident that significant excess IOU capacity or transmission existed at the moment," Dlouhy said.

The proposed rules also include information filing requirements. Oregon's IOUs would be required to include a resource adequacy assessment covering at least four years in their integrated resource plans. Electric service suppliers would add the RA information to their emissions planning reports.

Written comments on OPUC's proposed rules are due Jan. 25 at 3 p.m. ■

ERCOT News



ERCOT Appeals for Conservation as Winter Roars in

By Tom Kleckner

With demand projections and available capacity changing by the minute as a winter storm rolled into Texas, ERCOT and state officials spent last week assuaging Texans that the grid will remain standing this week.

Speaking to residents who remember well the devastating February 2021 winter storm that killed hundreds and caused billions in damages when the ERCOT *system failed*, Texas Gov. Greg Abbott said during a *press conference* Friday, “I know a lot of people are concerned, ‘Is the power going to stay on?’

“We feel very good about the status of the Texas power grid and ERCOT to be able to effectively and successfully ensure that the power is going to be able to stay on throughout the entirety of this episode,” he added.

The National Weather Service placed much of the state under a *winter weather advisory* through Monday, warning of “dangerous” temperatures in the 20s as far south as the Gulf Coast. However, unlike three years ago, little snow or ice is expected.

ERCOT CEO *Pablo Vegas* said Friday he expects renewable energy to perform as normal, given the lack of precipitation statewide. He said there were no expectations of energy emergencies or conservation calls.

“Things can change and if it does change, we’ll continue to communicate openly over the course of this weekend,” Vegas said.

Sunday evening, things changed. ERCOT issued a *conservation appeal* for Monday morning due to the freezing temperatures, demand and low reserves. The ISO asked Texans to conserve their electric usage between 6 a.m. and 8 a.m., when solar resources start ramping up and temperatures are forecasted to be below 10 degrees Fahrenheit in North Texas.

ERCOT expects conditions to be similarly tight this morning. As of 7 p.m. Sunday, the grid operator was projecting a record peak of 86.1 GW, with only 83.8 GW of seasonal available capacity. However, the forecasted curves have changed frequently in the days leading up to the storm’s arrival.

Demand that high is the norm during the summer, having peaked at 85.5 GW in August. ERCOT set its record winter peak of 74.5 GW during the December 2022 winter storm.

The ISO stressed the conservation appeal



ERCOT CEO Pablo Vegas (2nd from left, front row) joins Texas Gov. Greg Abbott and other state officials for a press conference on the winter storm. | Office of Texas Governor Greg Abbott

does not indicate it is experiencing emergency conditions. It said in a press release staff will “remain vigilant and communicate further if conditions change.”

ERCOT also asked all state and local government agencies to reduce energy use at their facilities until at least 10 a.m. Monday.

The grid operator previously issued a weather watch that went into effect Sunday and expires Wednesday. It said it made the advance notification because of “forecasted significant weather with higher electrical demand and the potential for lower reserves.”

Vegas has said the grid “is as ready and reliable as it has ever been for the winter season.” Legislation passed since the disastrous 2021 winter storm has strengthened the ISO’s weatherization practices — staff have completed nearly 1,800 facility inspections over the past couple of years — and created new ancillary services that can be brought to bear.

SPP Expects Near-record Demand

SPP said it projects to have sufficient capacity to meet anticipated demand this week, despite minimum temperatures in its 14-state Great Plains footprint similar to those observed during the December 2022 storm.

“We have substantial systems and procedures in place and our staff stands ready to mitigate any risks related to maintaining electric reliability,” Senior Vice President of Operations

Bruce Rew said in a *statement*.

With temperatures that could be 30 to 50 degrees below normal, the RTO was expecting load to be as high as 45 on GW Monday and 46 GW today. Its all-time winter peak is 47.2 GW, set during Winter Storm Elliott in 2022.

SPP said high pressure building into the Plains behind the cold-weather system may bring a sharp reduction in wind power generation, elevating the risk of outages. The grid operator on Friday issued a conservative operations advisory for its balancing authority area, effective 4 a.m. CT Sunday through 9 p.m. today.

The RTO previously issued weather and resource advisories. The weather advisory began Saturday and extends until 6 p.m. today. The resource advisory began Sunday morning and ends at 12 a.m. Thursday.

Heavy snow began falling in Oklahoma City on Sunday afternoon as temperatures hovered around 3 degrees.

The advisories do not require public conservation but are meant to raise awareness for transmission providers and generation owners of potential threats to reliability.

Staff called an emergency conference call of the Market Working Group on Jan. 11 to discuss the weather conditions and answer members’ questions. They’ve encouraged their members to update their market offers every day to best reflect the conditions their resources might be experiencing. ■

ISO-NE News

NEPOOL Markets Committee Briefs

Analysis Group Presents Final Report on Capacity Market

WESTBOROUGH, Mass. — Adopting prompt and seasonal capacity auctions would provide a range of benefits that would help enable New England’s clean energy transition, Todd Schatzki of Analysis Group told the NEPOOL Markets Committee on Jan. 11.

Schatzki presented the consulting firm’s [final report](#) on significant potential changes to ISO-NE’s Forward Capacity Market. While the Forward Capacity Auction is currently held more than three years prior to the annual capacity commitment period (CCP), ISO-NE is considering a transition to holding the auction as close as a few months prior to the CCP, as well as dividing the CCP into distinct seasons.

Responding to stakeholder questions based on a draft report the firm presented in December, Schatzki reiterated Analysis Group’s recommendation to adopt a prompt and seasonal market for the 2028/29 CCP. (See [Analysis Group Recommends Prompt, Seasonal Capacity Market for ISO-NE](#).)

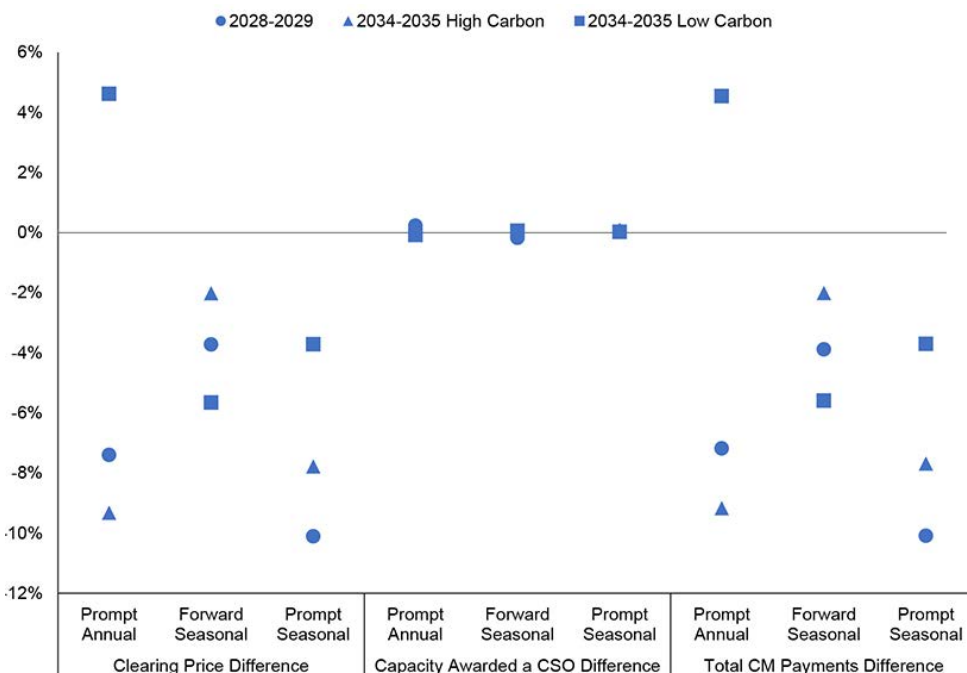
A prompt format would provide a “technology-neutral platform for competition among resource types,” Schatzki told the MC. This would benefit new clean energy resources with shorter development timelines compared to new gas plants, which the existing forward market was originally designed to accommodate, he said.

Schatzki added that a prompt, seasonal market would also more accurately forecast load growth from electrification and the effects of counterbalancing state policies intended to reduce demand. He also noted that a seasonal format would also increase incentives for resources that provide winter reliability benefits.

A seasonal market “creates price signals for the development of capacity resources to complement the variable output of resources important to states’ decarbonization efforts, such as solar PV and offshore wind,” Schatzki said.

Responding to stakeholder questions about the merit of holding seasonal auctions simultaneously or sequentially each year, Schatzki said sequential auctions could result in a small percentage of resources obtaining only a capacity supply obligation in one season, creating a risk that these resources would struggle to recover their annual costs.

In contrast, holding the auctions simultaneously could enable generators to dictate annual



Comparison of capacity market formats | Analysis Group

revenue requirements that need to be recovered through one or multiple seasons.

Analysis Group declined to recommend either design. It noted that holding the auctions simultaneously “offers many conceptual advantages, but the auction structure decision requires a thorough and careful assessment.”

The firm made some changes to the methodology of the quantitative analysis for the final report, finding that alternatives to the FCM resulted in lower prices in eight out of nine scenarios, by 8% on average. A prompt and seasonal market showed the most significant price reductions, with payments projected to be 12% lower — equal to more than \$200 million annually — relative to the FCM.

ISO-NE is planning to make a recommendation on whether to move to a prompt and seasonal market at the MC’s meeting next month, with a vote by the committee on whether to further delay FCA 19 projected to occur in March.

Resource Capacity Accreditation Impact Analysis

Throughout the three-day MC meeting, NEPOOL discussed several aspects of ISO-NE’s ongoing Resource Capacity Accreditation (RCA) project, which would bring major changes in how the RTO calculates the capacity value of several resource classes.

Dane Schiro of ISO-NE [presented](#) the RTO’s updated impact analysis framework, which is intended to “provide quantitative insights into the RCA design.”

The analysis will provide information on how the RCA changes would affect accreditation values and capacity supply obligations for different resource types, as well as metrics related to capacity market prices and loss-of-load expectations. ISO-NE performed an initial version of the impact analysis in April 2023 before a software issue derailed the project for several months.

In a change from the initial impact analysis methodology, gas resources will now be studied at the fleet level instead of at the individual level, while the risk assessment for oil resources will include a two-week inventory limit.

The analysis will use a base case that employs the resource mix associated with the upcoming FCA 18 and the load forecast for FCA 19. Imports will be based on the level cleared in FCA 13, which represents the median amount from the past five auctions.

The first phase of the analysis will focus on resource accreditation in the base case, while the second phase will look at different sensitivity scenarios, including changes to the amount of fossil fuel resources replaced by renewables and an increased winter peak load. The third phase is intended to give quantitative insight

ISO-NE News

on auction results, including demand curves, clearing prices and LOLE.

Marginal Reliability Impact Calculations

As a part of the ongoing RCA project, Steven Otto of ISO-NE *detailed* the RTO's proposed approach to calculating the marginal reliability impact (MRI) and qualified MRI capacity (QM-RIC) values for different resource classes.

MRI aims to quantify how small changes to a given resource's output would affect grid reliability. MRI is an input to QMRIC, which represents a resource's overall accredited capacity.

MRIs will be calculated for two seasonal periods: a June-September summer period and an October-May winter period. Seasonal MRI values for existing thermal resources "will be driven by their equivalent forced outage rate on demand excluding events out of management control," ISO-NE said.

For new thermal resources, MRI values will be calculated based on the averages associated with their resource class. MRI values for new storage and large wind and solar resources will be created by modeling the marginal addition of a proxy resource. Small existing intermittent resources with a nameplate capacity of less than 10 MW will be combined into aggregations for their MRI assessments.

Gas Accreditation

Prior to the MC meeting, ISO-NE issued a *memo* detailing several potential methodologies for accounting for gas system constraints in the RCA updates. The current accreditation approach does not account for gas system constraints when determining a resource's capacity value.

The RTO is recommending a derating ap-

proach for gas resources, which "decreases the accredited capacity of all gas resources so that their total accredited capacity equals the gas constraint," ISO-NE wrote.

ISO-NE also discussed the possibility of a "market constraint approach," which would not decrease the accreditation of gas resources based on a lack of firm fuel commitments, but instead would "decrease the amount of gas capacity procured in the winter ... and would pay that capacity a lower price."

"The market constraint approach achieves the same level of reliability as current rules, but at least cost," ISO-NE said. "The awards determined by the market constraint are cost minimizing: No other set of awards could achieve the same level of reliability at lower social costs."

ISO-NE proposed to conduct additional analysis into implementing a market constraint approach, while adding that the derating approach would be easier to quickly implement and makes sense as a "as a reasonable transition mechanism."

"Overall, the market constraint approach is preferred but is not implementable for FCA 19 or a one-year delayed auction timeline and likely requires a seasonal market construct," the RTO wrote.

ISO-NE also included the possibility of an "MRI=0 approach," which would not award any accredited capacity to gas resources that lack firm fuel arrangements. The RTO wrote that this approach "would not procure a socially optimal quantity of gas capacity, nor would it pay the gas capacity an appropriate price."

Tom Kaslow, vice president at FirstLight Power Resources, *presented* to the MC on the company's concern that ISO-NE's proposed approach would not provide adequate incentives for firm

gas contracts.

Kaslow told *RTO Insider* that ISO-NE's proposal to determine the maximum reliability contribution from gas resources based on the expected available gas supply could "undermine the forward contracting for firm gas supply access that would assure that the future year assumed gas supply is realized."

"While there is a history of a certain level of available gas supply to gas-fired generators, without advance contracting, circumstances can change, as evidenced by the possible retirement of the Everett Marine Terminal," Kaslow added.

The company is asking ISO-NE and NEPOOL for additional analysis into how the different approaches to accounting for gas system constraints would impact incentives for firm fuel contracts.

Committee Votes

The MC voted to support an update to ISO-NE's compliance with Order 2222 that would make distributed energy resource aggregations responsible for submitting their own metering data to ISO-NE.

FERC clarified in October that this metering information could "come from or flow through distribution utilities." (See *FERC Responds to ISO-NE Rehearing Request on Order 2222*.) ISO-NE's current *proposal* would allow a DERA "to designate itself, a party acting on its behalf or the host participant to be the assigned meter reader."

The committee also voted to recommend updating the forward reserve offer cap to \$7,200/MW-month and delay the publication of forward reserve auction offer data for 12 months to address market power concerns. ■

— Jon Lamson



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MISO News

Stakeholders Ask MISO to Share New Order 2222 Go-Live Date ASAP

By Amanda Durish Cook

MISO stakeholders this week pushed MISO to publish sooner rather than later a new deadline for accepting aggregators of distributed resources into its markets.

MISO hopes to file for a new implementation date and clear up other aspects of its Order 2222 compliance with FERC by May 10. While the RTO plans to discuss several aspects of its revamped compliance multiple times between now and early spring, it plans to devote only one final April 11 meeting of its DER Task Force to discussing the new target date. After that, it will present a final, reworked Order 2222 compliance proposal to the MISO Market Subcommittee at its April 18 meeting.

In October, FERC told MISO it had to achieve a more timely Order 2222 compliance, striking down the RTO's originally proposed plan to accept aggregators' offers beginning in the first quarter of 2030. (See [FERC: MISO's 2030 Finish Date on Order 2222 Compliance not Soon Enough.](#))

Clean Grid Alliance's Rhonda Peters asked MISO not to wait to hold discussions on its new implementation until spring.

"The implementation date is a topic of great importance to many stakeholders," she said during a Jan. 11 teleconference of MISO's

DER Task Force.

MISO's Marc Keyser said landing on a new implementation date will be relatively "straightforward" when compared to the other outstanding Order 2222 compliance directives FERC ordered MISO to resolve.

"Multinodal aggregations are a pretty complex topic...we think we'll need multiple discussions there," Keyser said.

However, Sierra Club's Justin Vickers said the implementation date is a "big deal."

"I think not being able to talk about that until the very end will affect how we will discuss other issues," he said, adding it would be "prudent" for MISO to share its revised go-live date with stakeholders expeditiously.

Organization of MISO States Executive Director Marcus Hawkins said MISO's 2030 finish date was revealed belatedly in its first round of compliance work, which led OMS to reassess MISO's compliance plan. OMS last year filed comments with FERC that a 2030 implementation date was too gradual.

Advanced Energy Management Alliance's DeWayne Todd asked MISO to consider a staged implementation to the order, where it works in DER aggregators' participation as it's able.

Otherwise with the Order 2222 compliance edits, MISO is reaching out to its stakeholders for advice on how it should best coordinate with regulators, distribution companies and aggregators to solve FERC's directive to establish cybersecurity and customer data privacy protections for meter data management.

The RTO also is seeking stakeholder reactions on how it should set up dispute resolution when disagreements arise between aggregators, LSEs, distribution companies and/or regulators over meter data or settlements. MISO is proposing that it become involved and review an aggregator's participation in its markets when its settlements are successfully disputed more than 10% of the time by an LSE and the financial impacts of successful disputes exceed \$7,500 for an individual dispute or average at least \$100,000 across all successful disputes.

MISO will hold two workshops with distribution companies on Order 2222 compliance: a Jan. 22 teleconference to discuss a 60-day timeline and process for reliability reviews to monitor DER aggregations' impact on the distribution system and a Feb. 27 teleconference to hash out operational coordination.

MISO also plans to discuss how it might handle DER aggregations across multiple pricing nodes at DER Task Force meetings beginning in February. ■



NYISO News

NY Gov. Proposes Streamlined Transmission Review, Permitting Current Process too Slow for Clean Energy Transition, Hochul Says

By John Cropley

New York's governor is proposing to streamline the transmission permitting process, which she calls a chokepoint that is slowing progress of the state's clean energy transition.

The RAPID Act – Renewable Action through Project Interconnection and Deployment – would create a one-stop process for environmental review and permitting of major renewable energy and transmission facilities.

A single transmission project can take up to 24 months to permit, which is too slow, Gov. Kathy Hochul (D) said. To meet the goals of the state's *Climate Leadership and Community Protection Act*, the need for environmental protection and community input must be balanced with rapid decision-making, she said.

The RAPID Act was one of 204 proposals Hochul offered Jan. 9 with her *State of the State Address*. She did not mention it during the address itself, which focused heavily on social programs and quality-of-life issues.

But it is on the table for the opening round of the intense spending and policy deliberations that will continue into spring at the Capitol.

Significant Changes

"As New York continues to strive to build the clean energy infrastructure of the future, our pace of progress is jeopardized by the lack of a mechanism to fast-track transmission projects and grid interconnection decisions," Hochul wrote in her State of the State message.

To help address this, she proposes to modify and expand the state's Office of Renewable Energy Siting.

ORES is a product of the Accelerated Renewable Energy Growth and Community Benefit Act of 2020, a first-of-its-kind effort to streamline review of large-scale renewable power generation projects in New York. Developers have been complimentary about its work, though with some suggestions for improvement. Notably, ORES has permitted 15 projects in its short existence.

Hochul wants to move ORES from the Department of State to the Department of Public Service and expand its powers of review to transmission facilities. The goal is to combine the successes of DPS and ORES with a clear statutory framework for transmission permitting.

Also, Hochul said she will direct DPS to open

a proceeding to improve interconnection of distributed energy resources. It will consider incentives, penalties and other ways to move New York utilities toward faster, more-efficient interconnection of DERs.

NYISO is working toward many of the same goals in the transmission planning process. In response to Hochul's proposals Jan. 9, Vice President Kevin Lanahan said:

"Connecting large-scale renewable generation to the grid as quickly and reliably as possible is among the highest priorities of The New York Independent System Operator. We look forward to participating in the Department of Public Service proceeding once it is initiated. The NYISO worked collaboratively throughout 2023 with utilities, renewable developers, and state policymakers to identify and implement significant efficiencies and improvements to the interconnection process. Our work is not done, and Governor Hochul's proposal comes at an important and opportune time."

Other Proposals

In other energy- and utility-related matters, Hochul also proposed:

- The Affordable Gas Transition Act, designed to limit new utility investment in the fossil fuel infrastructure the state is trying to phase out while also promoting affordability for customers who switch from natural gas to electricity for heating. She will seek the end of the 100-foot rule, requiring utilities to provide free hookup for anyone within 100 feet of existing gas infrastructure.
- The Smart Energy Savings Initiative, which seeks to integrate the current patchwork of utility programs and state policies into a time-of-use demand management program that would reduce the need for costly generation and transmission investment while also providing participating customers with significant savings.
- NY Grid of the Future, a Department of Public Service proceeding that would identify smart grid technologies that would enable flexible services such as virtual power plants. The goal is to produce by the end of 2024 a plan that would lay out capabilities, costs, benefits and savings.
- Statewide Solar for All, which would combine the utility-managed Energy Affordability Program and Community Solar to save



N.Y. Gov. Kathy Hochul (D) delivers her 2024 State of the State Address on Jan. 9. | *New York Governor's Office*

NYISO News

800,000 low-income households \$40 per year.

Reaction

Hochul's proposals drew quick reaction from advocates and stakeholders.

The Alliance for Clean Energy New York has a long list of green priorities it is advocating on its own and praised some of those Hochul laid out, particularly the need for transmission upgrades: "New York needs a speedy and fair permitting process for clean energy. ORES has issued permits more efficiently than the previous process, but there are still problems. In the application review, for example, deficiencies are identified in multiple rounds rather than all at once, and ORES has been inconsistent in application requirements. These issues are unnecessarily delaying the process without

any additional benefit to communities or the environment. We hope today's proposal will fix those problems as well."

NY Renewables called for firmer action backed with heavy spending: "We applaud Governor Hochul for including parts of the NY HEAT Act in the State of the State policy agenda, ending the regressive policy where New Yorkers pay hundreds of millions of dollars to expand the state's fracked gas pipelines. It's time New York starts shifting our state's energy infrastructure away from fossil fuels and toward the electric and thermal energy networks that we'll need to power our homes, workplaces and public buildings in the future. But we'll need much more to protect the safety and survival of our families, communities and environment for generations to come."

Advanced Energy United applauded the clean

energy initiatives, particularly the transition away from natural gas and strengthening the transmission infrastructure: "Building a bigger, better electric grid and electrifying buildings are investments in home-grown energy resources that will create in-state jobs and a more resilient energy system, and benefit the health and financial wellbeing of all New Yorkers."

The Building Decarbonization Coalition found a lot to like: "BDC applauds Gov. Hochul's commitment to advancing New York's nation-leading energy affordability and building decarbonization efforts with a plan that will help transform how New York heats and cools its buildings, making families' energy bills more affordable, fortifying the state's clean heating and cooling infrastructure with union jobs, and lowering the state's climate emissions." ■

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NYISO News



NYISO Finds No Need for New Capacity Zones

ISO Presents Final LCR Results, Shares Update on Capacity Accreditation Project

Interface	Source	Sink	FCITC* (MW) [a]	Net Available Capacity@ (MW) [b]	Transmission (+) or Bottled (-) Capacity (MW) [c=a-b]	Constraint
West Central	AB	CDEF	2,214	352	1,862	(1)
Dysinger East	A	BCDEF	1,950	267	1,683	(2)
Moses South	D	ABCEF	2,019	106	1,913	(3)
Volney East	ABC	DEF	4,140	813	3,327	(4)
Total East	ABCDE	F	5,766	963	4,803	(5)
UPNY-ConEd	G	HI	2,644	1,784	861	(6)

Final NYISO highway interface deliverability test results | NYISO

By John Norris

NYISO will not need to create any new capacity zones to ensure grid reliability over the next four years, the grid operator told stakeholders Jan. 9.

That was the conclusion of NYISO's quadrennial new capacity zone (NCZ) *study*, the results of which the ISO *presented* to a meeting of the Installed Capacity/Market Issues working groups (ICAP/MIWG). The study found that none of New York's six "highway interfaces" — the transmission links between capacity zones — are constrained, eliminating the need to establish an NCZ.

The NCZ study's deliverability tests assess whether each highway interface can accommodate additional power flows and has an "additional transmission capacity" (or deliverability "headroom") or cannot support more power and has "bottled generation capacity" (a deliverability "constraint"). The results showed, however, that each interface has additional transmission capacity, negating the need for new zones. The finding aligns with the 2019/20 NCZ study, which also identified no constraints.

NYISO performs the NCZ study in conjunction with its *demand curve reset* (DCR), another quadrennial process to review and adjust the demand curves in its capacity market to ensure

they accurately reflect the current costs and market conditions for providing reliable electric service in New York.

NYISO must share the NCZ study with its Market Monitoring Unit for review and commentary and submit the study's results to FERC as an informational filing by March 31.

Final LCR Results

At the ICAP/MIWG meeting, NYISO also *presented* the final locational minimum installed capacity requirements (LCR) for the 2024/25 capability year, which were based on the 22% installed reserve margin (IRM) approved by the New York State Reliability Council's Executive Committee (NYSRC EC) late last year. (See *NY Reliability Council Approves 22% IRM for 2024/25*.)

The IRM determines the additional amount of capacity New York load-serving entities must maintain as a precaution against unexpected outages or demand surges.

Stakeholders raised questions about future discussions on transmission security limits (TSLs) and the assumptions contained within them, highlighting their growing relevance in LCR determination. TSLs define the maximum power capacity that can be safely transferred over the transmission network in a particular area, directly influencing the LCR and IRM by

indicating the minimum generation required to maintain grid reliability within transmission constraints.

NYISO staff confirmed it is engaged in ongoing discussions with the NYSRC and its subcommittees to refine TSLs and their assumptions and indicated those talks are expected to continue throughout 2024.

The ISO intends to seek stakeholder approval for the final LCR results at the Jan. 18 Operating Committee meeting.

Capacity Accreditation

NYISO staff also told ICAP/MIWG meeting attendees that the second set of informational capacity accreditation factors (CAFs), derived from the base case that produced a 23.1% IRM, will soon be published *online*.

The IRM was derived from a technical *study* produced by both NYISO and the NYSRC's Installed Capacity Subcommittee, which concluded that, under base conditions, a 23.1% IRM would satisfy the resource adequacy criteria without violating a loss-of-load expectation of no more than 0.1 event-days/year in the next capability year.

The ISO said this second set of materials will include emergency assistance updates not captured in the first set of CAFs and must be posted by March 1. ■

NYISO News

NY State Reliability Council Executive Committee Briefs

Gas Constraints

NYISO briefed the New York State Reliability Council Executive Committee (NYSRC EC) on an upcoming white paper to propose updates to the ISO’s resource adequacy modeling, including a recommendation to use a tiered load-based approach to estimate gas availability during the coldest winter days.

Slated to be released by the end of the first quarter, the white paper comes in response to *findings* by NYISO’s Market Monitoring Unit, Potomac Economics, which found that eastern New York faces significant gas availability issues during peak cold conditions due to regional pipeline constraints.

Con Edison’s Howard Kosel, the new chair of the NYSRC’s Installed Capacity Subcommittee (ICS), told the EC that NYISO is likely to *recommend* incorporating a tiered methodology based on load levels in its winter RA modeling to determine gas availability. This approach would assume no gas availability at loads exceeding 26,000 MW.

The recommendation is based on Potomac’s observation that constraints in eastern New York during the coldest peak winter days were not being accurately modeled. Consequently, the ISO’s RA modeling during these periods

Tier	NYCA Load Conditions	Available Gas	Available Oil	Total Available Fuel (Gas + Oil)
1	>26,000	0 MW	11,000 MW	11,000 MW
2	25,000 - 26,000	750 MW		11,750 MW
3	24,000 - 25,000	2,750 MW		13,750 MW
4	23,000 - 24,000	4,500 MW		15,500 MW
5	22,000 - 23,000	5,500 MW		16,500 MW
6	<22,000	No Constraint		No Constraint

NYISO’s proposed tiered modeling update that uses load levels to capture gas constraints | NYISO

was undervaluing certain generators and failing to anticipate the necessary level of gas procurement before peak winter days.

The ICS will track the ISO’s progress and plans to share the white paper’s findings with the EC once published.

PRR-151

The Reliability Rules Subcommittee (RRS) also briefed the EC about comments received on *Proposed Reliability Rule 151* (PRR-151), which includes suggestions for adjustments to attestation requirements and the introduction of exemptions for evolving technologies.

The NYSRC developed PRR-151 to address gaps in NYISO’s current interconnection criteria for inverter-based resources (IBRs) and

establish standardized rules for IBRs larger than 20 MW. The committee endorsed industry comments on PRR-151 late last year. (See *NY Reliability Council OKs Interconnection Standards for Large IBRs.*)

AES Clean Energy, Ørsted, GE and Alliance for Clean Energy New York submitted comments, aiming to ensure PRR-151 remains flexible and does not hinder the integration of IBRs in the future.

Roger Clayton, chair of the RSS, said the plan is to modify PRR-151 based on the comments received, with the expectation that the revised rule will be presented to and approved by the EC at its next meeting in February. ■

— John Norris

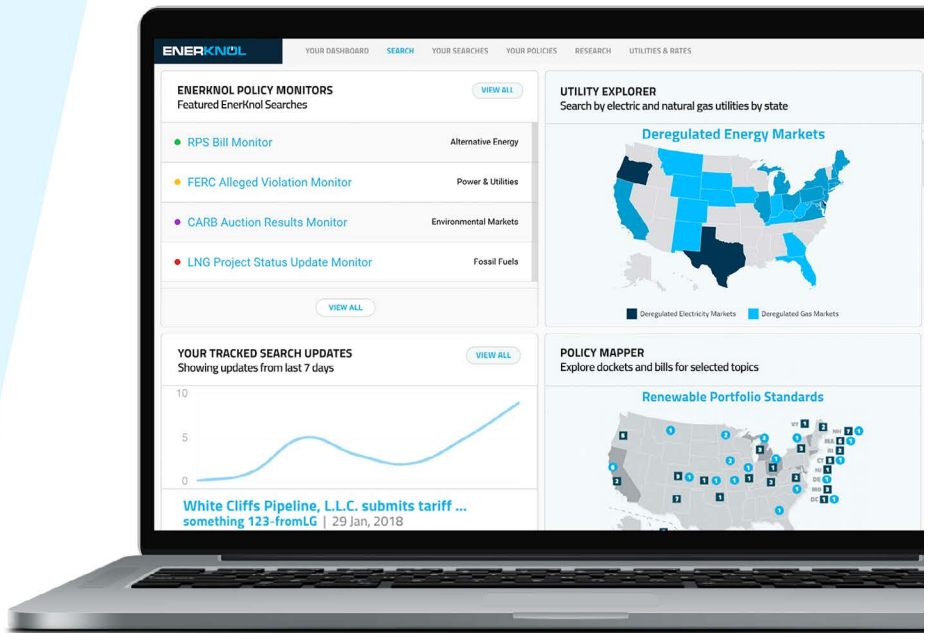


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PJM News



PJM Requests 2nd Talen Generator to Delay Retirement

By Devin Leith-Yessian

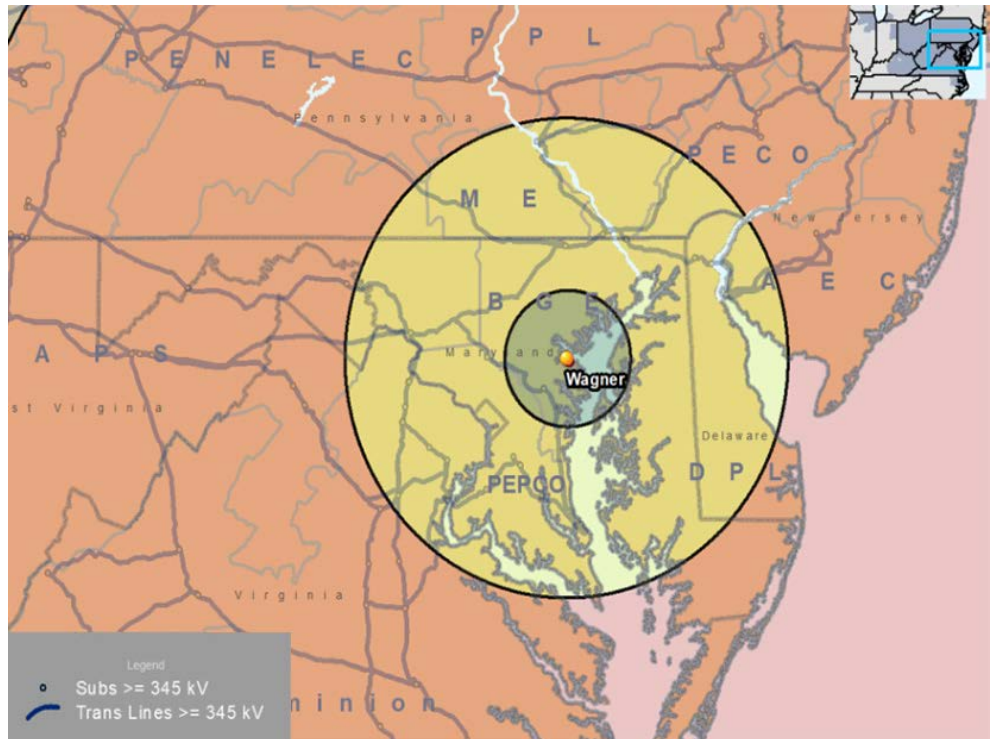
PJM has asked Talen Energy to enter into a reliability-must-run (RMR) contract to continue operating its oil-fired H.A. Wagner generator, located outside Baltimore, three years beyond its requested retirement date in 2025.

In its Oct. 16 *deactivation request*, Talen asked to take the generator offline on June 1, 2025, citing air quality restrictions that limit its run time and the economics of PJM's capacity market as prompting the retirement. Wagner is configured with three oil units and one gas-fired combustion turbine; PJM's request would retain the oil-fired Units 3 and 4, which output 305 and 397 MW, respectively.

"The Wagner facilities' [Clean Air Act] Title V air permit limits operation to capacity factors under 15% when operating on oil. ... The combination of low margin energy market economics, low capacity prices and significant Capacity Performance penalty risk due to run hour limitations results in the economics being outweighed by the risk associated with continued operation," Talen said.

During the Oct. 9 Transmission Expansion Advisory Committee meeting, PJM's Perry Ng said the RTO's *reliability analysis* found that taking the 844-MW generator offline in 2025 would cause voltage and thermal violations throughout the Baltimore Gas and Electric region. The projected issues were identified when the Wagner retirement was combined with the deactivation of Talen's 1,283-MW Brandon Shores generator, which the company also requested to go offline in 2025 and is adjacent to Wagner.

By delaying the retirement by three years, Ng said planned transmission upgrades could be completed and resolve the violations without any new Regional Transmission Expansion Plan projects. In particular, he said a component of the \$5 billion package of transmission projects that the Board of Managers approved in December would resolve the violations. That component, the construction of the 65-mile, 500-kV North Delta-High Ridge line and up-



A PJM graphic shows the region where voltage concerns were found in the analysis of the deactivation of the H.A. Wagner Generating Station. | PJM

grades to both substations, is projected to be in service between 2026 and 2028. (See *PJM Board Approves \$5 Billion Transmission Expansion*.)

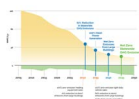
PJM has also asked Talen to continue operating Brandon Shores on an RMR contract through 2028, though Senior Manager of Transmission Planning Sami Abdulsalam said the discussions on the contract are still in progress. (See "Brandon Shores Deactivation to Require \$786M in Grid Upgrades," *PJM PC/TEAC Briefs: June 6, 2023*.)

Since the start of December, Ng said an additional four generators have requested full or partial deactivation:

- Constellation Energy has *requested* deactivation of Eddystone Units 3 and 4, totaling 760 MW, on May 31, 2025. The generator is a dual-fuel resource located outside Philadelphia.

- Archaea Energy *requested* deactivation of its 11-MW, methane-powered Virginia Beach LF generator on April 1.
- GenOn Energy Management *requested* requested deactivation of four CTs, amounting to 216 MW, at its Morgantown Generating Station near Newburg, Md., on June 1.
- Heritage Power *requested* deactivation of its four dual-fuel CTs at the Sayreville Energy Center, amounting to 217 MW. The company cites a New Jersey Department of Environmental Protection rule limiting emissions effective June 1, which is the date the company requests that the generator goes offline. The notice suggests the possibility that the company may make modifications to the site to allow it to resume operations in compliance with the regulations or that it may permanently retire. ■

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Md. Emission-reduction Plan: High Ambitions, No Funding

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PJM News



PJM OC Briefs

RTOs Submit Comments on EPA Rules

PJM reviewed [comments](#) it jointly submitted with other RTOs on EPA's proposed regulations on greenhouse gas emissions from power plants to the Operating Committee during its Jan. 11 meeting.

The comments were also signed by MISO, ERCOT and SPP and largely focused on allowing them to maintain their ability to ensure resource adequacy and call on specific units during emergency scenarios.

PJM's Gary Helm said the grid operators warned that the timeline for requiring carbon capture or hydrogen fuel blending for coal and gas resources could quicken the pace of generator deactivations. They recommended rethinking the requirements for new combustion turbine units, as EPA's proposed rule would require that new CTs include either carbon capture or hydrogen blending when they are brought online. They argued that the infrastructure to support either of those capabilities does not yet exist. Rather than looking at what technologies exist, they urged EPA to also consider what infrastructure is available to make that technology accessible to generators. (See [FERC Dives into Reliability Implications of EPA's Power Plant Rule.](#))

The proposal "is pretty far reaching, and because of the stringency of the requirements, we're looking at seeing retirements ... as well as limitation on the operation of gas-fired generation," Helm said.



Gary Helm, PJM | © RTO Insider LLC

The grid operators also provided recommendations for creating a "safety valve" to ensure that resource adequacy is not compromised by the rule, including identifying units that may be needed to maintain reliability; a "regional bank" of reliability credits that could be used to operate during emergencies; guidance for states to create resource adequacy and reliability plans; and direction on the agency's thinking on the remaining useful life of assets.

System Operating Metrics

PJM saw two days outside its 3% target load forecast error during December, according to the system operations [report](#) delivered by Stephanie Schwarz, manager of

markets coordination.

The RTO underforecast load by just over 4% on Dec. 3, while the forecast for Dec. 24 was about 3.5% above actual conditions. December also saw a shortage case approved Dec. 1, which Schwarz attributed to load, interchange and intermittent generation being affected by shifting weather patterns.

Two spin responses were implemented Dec. 14 and 19 lasting 12 minutes and 15 seconds and 6.5 minutes, respectively. The Dec. 14 event had an assignment of 2,712 MW and a response rate of 1,436 MW, leading to 1,276 MW of penalties being assessed. The Dec. 19 event had a full response from the 2,687 MW it deployed.

Other Committee Business

PJM Director of Enterprise Information Security Jim Gluck urged market participants to remain vigilant for possible social engineering and phishing intrusion attempts aimed at gaining access to computer systems and locking users out for a ransom. He said there have been a growing number of attacks that include individualized research into companies in an attempt to make messages more authentic, including impersonating employees.

The RTO also presented a quick-fix [proposal](#) to revise Manual 3A to change language pertaining to the Bulk Electric System to conform to NERC-approved definitions. ■

— Devin Leith-Yessian

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[Offshore Wind: Analyst Addresses Industry's Growing Pains](#)



[Offshore Wind: NY, NJ Collaborate to Boost Infrastructure, Supply Chain](#)



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PJM News



PJM MIC Briefs

Simulation Analysis of PJM CIPF-RA Filing

PJM’s Market Implementation Committee discussed the RTO’s *analysis* of how proposed Critical Issue Fast Path (CIPF) filings before FERC might have impacted the 2024/25 Base Residual Auction results. The item originally was listed as informational only, but stakeholders voted to add it as a full agenda item for further discussion.

A total of 136,232.7 MW of unforced capacity (UCAP) was procured in the simulated auction, a 11,246-MW decrease from the actual results. However, the cost to procure that capacity increased from \$2.2 billion to \$2.4 billion. That trend was on display in the “rest-of-RTO” region, where the clearing price increased from \$28.92/MW-day to \$47.70/MW-day while the amount procured fell. (See *PJM Capacity Prices Jump in 5 Regions.*)

“There are a lot of moving pieces here. This is in part because the changes in accreditation types hit some regions differently,” Walter Graf, PJM’s senior director of economics, told the MIC during its Jan. 10 meeting.

PJM’s Skyler Marzewski said the CIPF changes are intended to increase the reliability value of a megawatt of accredited capacity, so even with fewer megawatts clearing the auction, reliability could improve as more efficient units received capacity commitments. In regions where capacity prices declined, Marzewski

said, the more efficient resources being picked up in the simulated auction could allow for the same degree of reliability at a lower price.

Calpine’s David “Scarp” Scarpignato said that may account for some of the difference, but the sharp drops in some regions indicated there must be other factors. He pointed to the Eastern Mid-Atlantic Area Council (MAAC) region, where the clearing price fell from \$54.95/MW-day in the actual auction to \$47.70 in the simulation, while the simulation declined 9% from the 39,303 MW actually committed.

“It’s just so overwhelming, the difference ... it looks to me like the amount of reliability you’re purchasing is going down,” he said.

Several stakeholders questioned how the resource mix differed in the simulated auction, but PJM said the information was not yet available.

Marzewski said the analysis is not meant to be taken as a trend or indicative of future auction results, which likely are to be influenced by changing market conditions.

Real-time Temporary Exceptions Manual Revisions Proposed

PJM’s Lauren Strella Wahba *presented* proposed revisions to Manual 11, which pertains to energy and ancillary services market operations, to reflect FERC’s Nov. 30 approval of a process for market sellers to submit temporary exceptions from their unit-specific parameters.

The revisions would replace the real-time values process PJM used for market sellers to submit changes to their ability to operate according to their parameters during the operating day. (See “Temporary Exceptions Supplant Real Time Values,” *PJM MIC Briefs: Dec. 6, 2023.*)

Wahba said only one temporary exception should be submitted for an issue preventing a resource from operating according to its parameters. If the issue is expected to last more than 30 days, a period exception instead should be submitted with accompanying documentation showing the disruption is persistent. The market seller should notify PJM and the IMM of any changes in the physical condition of a resource operating with a temporary exception or the ability to return to normal operations.

Because FERC’s order had an effective date of Nov. 30, Wahba said, the manual changes are conforming language codifying a practice put in place last year.

Quick Fix Proposal on Interface Pricing Points

PJM presented a quick fix *proposal* to revise Manual 11 to reflect existing practices for interface pricing points, a mechanism that groups buses together when calculating LMPs for energy imports to, or exports from, external areas.

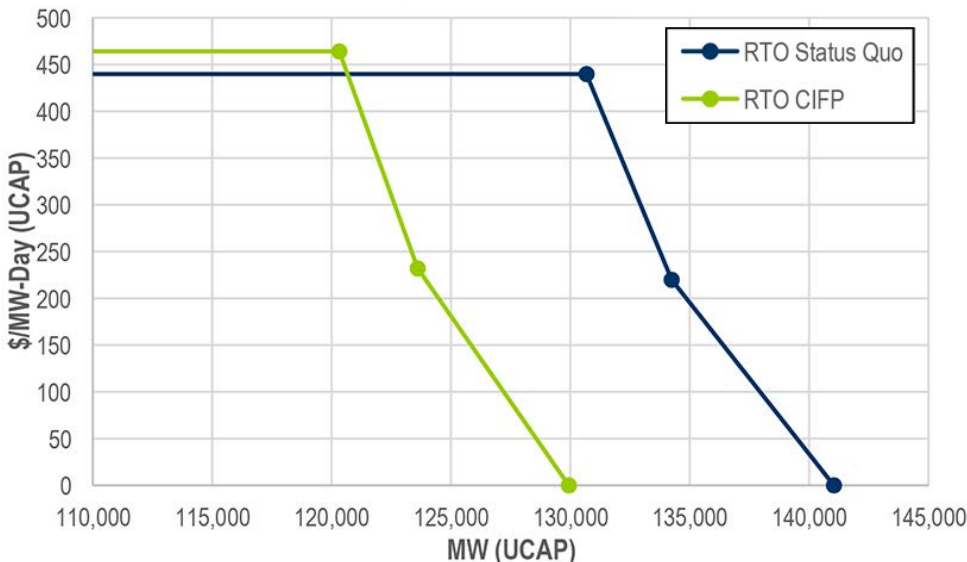
The quick fix process allows a proposed solution to be brought and voted on concurrent with a *problem statement* and *issue charge*.

The revisions also would include a recommendation from the Independent Market Monitor to monitor all interfaces as needed — language that exists in the Operating Agreement but is not mirrored in the manuals.

Paul Sotkiewicz, president of E-Cubed Policy Associates, questioned the need for using the quick fix process in this instance and said PJM increasingly has been relying on the expedited process, making it difficult to ensure stakeholders fully understand changes being made.

“Here we are again, with yet again another issue that we’re using the quick fix process for without a meaningful discussion of how these changes are going to be made so people can understand them,” he said. “I want to express more and more concern about PJM’s use, and I dare say abuse, of the quick fix process.” ■

— Devin Leith-Yessian



A PJM simulation of the 2024/25 Base Residual Auction using the proposed rule changes in a pair of FERC filings found that a lower amount of capacity would be procured at a higher average price. | PJM

PJM News



PJM PC/TEAC Briefs

PJM Presents Long-term Planning Proposal

PJM presented a quick fix [proposal](#) to introduce a new long-term transmission planning approach that would include a longer 15-year horizon and consider state legislation that could affect generator participation in RTO markets.

In giving a first read of the proposal during the Dec. 9 Planning Committee meeting, PJM's Michael Herman said it would establish five long-term scenarios:

- Two base cases 8 and 15 years in advance;
- Two 8- and 15-year scenarios assuming a medium amount of new entry prompted by state legislation; and
- One high new-entry scenario looking 15 years in advance and including policy goals not backed by legislation. The proposal includes changes to Manual 14B and 14F.

The base scenarios would focus on the grid's future reliability needs based on load forecasting, expected generation deactivations, and new resources in the interconnection queue and expected to be online within the scenario's horizon.

Thermal and voltage analysis would be performed on the 8-year base scenario, replacing the existing 10-year model for voltage analysis, and would be used to inform the 5-year Regional Transmission Expansion Plan (RTEP) near-term process. Thermal and some voltage analysis would be performed on the 15-year scenario.

PJM's Jonathan Kern said the proposal is meant to bolster PJM's process for addressing localized reliability issues on the transmission grid rather than targeting global resource adequacy and create new scenarios to meet various goals. The RTO would also make changes to the near-term planning process to ensure the long-term approach is harmonized.

"We want to have an efficient planning process, so we don't want to have a big disconnect," Kern said.

The current two-year planning cycle would be extended to three years to reflect the increased number of scenarios and sensitivities.

Exelon's Alex Stern said this was the first time stakeholders had the opportunity to review proposed manual changes. He identified three challenges that have still not been addressed:

- How projects that address both grid reliability needs and state policy goals would fit into the planning process;
- How PJM proposes to delineate between local reliability and regional reliability; and
- Where and how economic reviews will be applied.

PJM plans to seek PC endorsement of the quick fix proposal during its Feb. 6 meeting and, if endorsed, bring it to the Markets and Reliability Committee later that month for a first read. The quick fix process allows an issue charge and problem statement to be voted on concurrently with a proposed solution.

Paul Sotkiewicz, president of E-Cubed Policy Associates, expressed concern about how often PJM has been using the quick fix process to propose manual changes in recent months and questioned the necessity of using it in this case.

Stern said he was focused on providing substantive feedback, but conceded the manual changes are likely to require a level of discussion beyond the quick fix process. He worried that questions surrounding PJM's legal authority could put a cloud over any planning that flows from the changes, such that the long-term regional transmission planning analysis will be unable to produce feasible transmission projects.

PJM reviewed [proposed](#) updates to the TO/TOP Matrix, which indexes standards that transmission owners and PJM must comply with and delineates responsibilities to ensure compliance.

The changes include revisions to reflect emergency operations standards NERC approved in October under EOP-011-4, which includes operating plan requirements for emergencies related to "critical natural gas infrastructure loads that fuel a significant portion of ... generation." (See [NERC Board Approves Cold Weather Standards](#).)

If approved by the Transmission Owners Agreement-Administrative Committee (TOA-AC), the revised matrix would become effective April 1.

Transmission Expansion Advisory Committee

PJM Presents 2024 RTEP Timeline

PJM is building base cases for its 2024 Re-

gional Transmission Expansion Plan (RTEP) and accepting proposed changes to its basic assumptions, such as modeling, as long as they are expected to have a significant impact on baseline studies. It will also accept corrections to its analytical files. Feedback can be provided through March, when PJM plans to begin the baseline studies.

The RTO is seeking to open an RTEP competitive window in June or July, including a potential retool of the baseline analysis if needed. Review and approval of project proposals is planned to occur between October and February 2025.

Supplemental Projects

Exelon [presented](#) a project to replace a 230/69-kV transformer at its Atlantic City Electric Mickleton Substation for \$5.9 million. The existing transformer was installed in 1987 and is experiencing insulation wear and cooling issues. The project, which has a projected in-service date of May 31, 2025, is in the engineering phase.

Dominion [presented](#) a \$12.3 million project to construct a new 230-kV Lost City substation to serve a data center planned in Henrico County, Va. The proposed facility would cut into the existing White Oak-Techpark Place 230-kV line and has an estimated in-service date of July 1, 2025.

FirstEnergy [presented](#) several projects to replace transformers experiencing consistent maintenance issues or at the end of their lifespan. A 230/34.5-kV transformer at the Kittatinny Substation would be replaced with a 90-MVA unit for \$7 million; two 230/34.5-kV transformers at the East Flemington Substation would be replaced with 125-MVA units for \$14.36 million; and a 230/115-kV transformer at the Raritan River Substation would be replaced with a 224MVA unit for \$5.4 million. The projects also include related upgrades to relaying and breakers.

The utility also proposed a project to replace relays and conductors at its Whippany Substation for \$2.33 million to replace outdated equipment lacking spare parts. ■

— Devin Leith-Yessian

SPP News



Appeals Court Rejects Review of AEP Tx Rates

Texas Cooperatives Challenged 2022 FERC Decision

By Tom Kleckner

The D.C. Circuit Court of Appeals last week rejected four Texas cooperatives' request to review a 2019 FERC decision over American Electric Power's (AEP) transmission rates, saying the commission properly interpreted the terms of AEP's tariff (22-1166).

The Jan. 11 order is part of a proceeding that stems from FERC's approval of a settlement allowing AEP to transition its rates from a historical formula rate to a forward-looking formula rate and remove directly assignable transmission costs related to generation. East Texas Electric Cooperative, Northeast Texas Electric Cooperative and Golden Spread Electric Cooperative agreed to the settlement. Arkansas Electric Cooperative Co. intervened but did not join the settlement or oppose it.

AEP's 2020 annual update filed with FERC included the true-up calculations to be charged for transmission services provided in 2019. The cooperatives challenged the update and raised several issues that could not be resolved through the preliminary challenge process. The commission rejected several of the asserted error claims and a request for retroactive relief, leading to the cooperatives' petition for review. (See *FERC Partially Grants Challenges to AEP Transmission Rates*.)

The cooperatives appealed four rulings in the order: one concerning FERC's interpretation of the protocols to preclude relief for errors that allegedly occurred in prior rate years and three arguments that took issue with the



A federal appeals court has upheld a FERC decision over AEP's transmission rates. | *AEP Transmission*

inclusion of certain cost inputs in the 2019 charged rate.

The appeals court agreed with FERC that refunds for errors made in previous rate years are barred under its governing protocols and that the protocols are controlling. It rejected the cooperatives' other three arguments, saying FERC's order is reasonable and "adequately explained."

"We are 'particularly deferential to the com-

mission's expertise' in making highly technical rate classifications," Circuit Judge Florence Pan wrote.

Pan was one of three judges who heard former President Donald Trump's *immunity claims* from criminal charges Jan. 9.

FERC Approves SPP Revisions

FERC on Jan. 11 accepted SPP's tariff revisions that clarify the RTO's multiday reliability assessment (MDRA) process, how the day-ahead market consumes commitments made through the process, and how those commitments are compensated through settlements (ER23-2927).

The commission said SPP's proposal gives it flexibility in addressing system needs through the MDRA process ahead of extreme weather events and helps incentivize resources to perform when the grid faces reliability risks. FERC said the revisions help resources committed during the MDRA process manage fuel price volatility during extreme weather events.

The MDRA process is SPP's only way to commit resources in advance of its day-ahead market. It studies systems to help determine whether to commit resources and to provide notice to resources that they be online and should procure fuel. SPP said the revisions do not fundamentally change the process' core concepts.

The RTO said its proposal was informed by its experiences during the 2021 and 2022 winter storms, when it was forced to import capacity from neighbors to meet demand. ■

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- Commissioner
Gov. Regulator

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Company Briefs

Southwestern, Chesapeake Energy Close to \$17B Merger



U.S. natural gas producer Chesapeake Energy

and peer Southwestern Energy are nearing a merger that would create a nearly \$17 billion company, a person familiar with the matter said.

The deal could come together as soon as this week provided the talks do not fall apart, the source said, requesting anonymity since talks are private.

A potential deal could create a company that would overtake EQT as the largest natural

gas-focused exploration and production firm in the nation by market value.

More: [Reuters](#)

Spearmint Energy Completes 150 MW Storage Project in Texas

Spearmint Energy last week announced the completion and start of commercial operation for Revolution, the company's 150-MW battery energy storage system (BESS) project in West Texas.

The system consists of 134 containers holding 6,432 Sungrow battery modules, as well as 45 power conversion system units.

More: [Renewable Energy World](#)

Pacolet Milliken Acquires Georgia Biomass-fired Plant

Private investment company Pacolet Milliken last week announced it completed the acquisition of the 55-MW Piedmont biomass-fired power plant in Barnesville, Ga.

Piedmont operates the plant using 600,000 tons of biomass feedstock each year. Since beginning commercial operations in 2013, Piedmont has sold power to Georgia Power through a long-term PPA.

Financials were not disclosed.

More: [Power Technology](#)

Federal Briefs

Rhodium: US GHG Emissions Fell Slightly in 2023

After rising for two years in the recovery from the COVID-19 pandemic, total U.S. greenhouse gas emissions fell 1.9% from 2005 levels last year, a paltry amount toward the Biden administration's goal of 50 to 52% by 2030, according to the Rhodium Group.

The group's annual [report](#), released last week, highlighted that the decrease came even as the country's economy continues to grow, a welcome sign for climate hawks, as typically emissions only increase along with the economy. The data underscore that cutting emissions and growing the economy can be done at the same time, especially given the massive amount of tax subsidies for clean energy in the Inflation Reduction Act, Rhodium analyst Ben King told CNN.

The drop also came even as emissions from the transportation sector rose slightly, as power sector emissions continue to decline more significantly. The continued retirement of coal-fired plants was the main contributor, King said. The U.S. also experienced a mild winter, which also contributed to a decrease in building emissions.

U.S. emissions are currently just 17.2% below 2005 levels, Rhodium found. To reach the administration's goal, emissions will need to drop by more than 7% each year. King said that would take much more wind, solar, nuclear and other zero-emission resources providing electricity to

the grid; more vehicles on the road powered by electricity or zero-emission fuels; and heavy industry like steel, cement and chemical manufacturers slashing their emissions.

More: [CNN](#); [NPR](#)

EIA Predicts Batteries to Nearly Double; Solar to Grow Most



The Energy Information Administration on Jan. 9 predicted that the total battery capacity installed on the U.S. grid will rise from about 16 GW at the end of 2023 to about 30 GW by the close of 2024.

The large amount of existing and planned solar and wind capacity in California and Texas presents a growing need for battery storage, with the two states currently holding 7.3 GW and 3.2 GW of installed battery storage capacity, respectively. ERCOT in December said it expects about 4.46 GW of battery storage to be available by July 2024.

EIA also expects solar electric generation will be the leading source of growth in the U.S. electric power sector, boosting its share of total generation to 5.6% in 2024.

More: [Reuters](#); [EIA](#)

GAO Agrees to Investigate 'Zombie' Coal Mines in Appalachia

The Government Accountability Office on Jan. 11 said it will conduct a study in March on nonproducing coal mines that are



still classified as active by their owners in response to a letter from eight Democratic members of Congress, including Sen. John Fetterman (Pa.).

A citizens law group in Kentucky has found production idled at nearly 40% of all active coal strip mines in the state, with some not mined in more than a decade. Environmental advocates have been attempting to quantify these so-called "zombie mines," which they say not only can leak toxic waste but leave behind "highwalls": cliffs that can have dangerously loose boulders.

"Some coal companies are idling mines and stalling reclamation to cut costs," the lawmakers wrote to GAO. "Because mine operators typically rely on coal revenue to fund reclamation, the longer a mine remains idle, the greater the risk that the operator may not have sufficient funds to pay for reclamation."

More: [Inside Climate News](#)

State Briefs

COLORADO

Mesa County OKs Moratorium on Commercial Solar Projects

The Mesa County Board of Commissioners on Jan. 9 placed a moratorium on new commercial solar arrays to give county staff and residents more time to come up with regulations.

The board said it took the action, which could last up to six months, because the county's Land Development Code does not specifically address solar utilities.

While the moratorium calls for blocking new applications until July 9, it does allow commissioners to end it sooner or extend it longer as needed.

More: [The Daily Sentinel](#)

MARYLAND

US Wind Requests Marine Mammal Take Authorization for OSW

US Wind on Jan. 4 submitted a request for Incidental Take Regulations to the National Oceanic and Atmospheric Administration in regard to construction of the Maryland Offshore Wind Project.

The regulations would govern the authorization of take of a small number of 19 species of marine mammals. According to NOAA, take is harassing, hunting, capturing or killing any marine mammal, or attempting to do so. Although intentional take is prohibited, incidental take of small numbers can be allowed through an application process.

The requested regulations are for five years ranging from 2025 to 2029, incidental to construction of the proposed wind farm offshore in the Bureau of Ocean Energy Management lease area and associated cable routes that would need to run ashore.

More: [WRDE](#)

MICHIGAN

DTE Seeks \$266M Increase for Natural Gas Rates



DTE Energy

DTE Gas Company, a subsidiary of DTE

Energy, is seeking a \$266 million annual increase of its rates for natural gas services in 2024.

A residential customer who uses 100 cubic feet of natural gas per month would see a 9.9% increase (\$10.08) on their monthly bill if the full increase request is approved, according to DTE.

Attorney General Dana Nessel's Office filed an intervening brief asking the Public Service Commission to not approve the full increase without DTE explaining exactly why it needs to increase rates by so much.

More: [Detroit Free Press](#)

MINNESOTA

SCOTUS Denies Climate Change Lawsuit Challenge



The U.S. Supreme Court on Jan. 8 declined to take up a challenge to a lawsuit brought by state Attorney General **Keith Ellison** against six oil companies. The companies had sought to have the lawsuit moved

to federal court, and the court's decision to deny their petition keeps the case at the state level.

Minnesota's suit, filed in 2020, is one of several brought by cities, counties and states in the past seven years that seeks to hold oil firms accountable for their contributions to climate change. It argues that the companies duped consumers by hiding evidence that burning fossil fuels heats the planet. The defendants include the American Petroleum Institute, ExxonMobil and Koch Industries.

The court did not explain why it denied the petition, though its notice said that Justice Brett Kavanaugh would have allowed the challenge to be heard. Four of the nine justices must vote in favor for a case to get a hearing.

More: [Star Tribune](#)

NORTH CAROLINA

Gas Leak Near Fayetteville Fixed Following Evacuations

A gas leak that led to evacuations in Fayetteville on Jan. 4, displacing dozens of people, has been fixed.

A subcontractor working for the general contractor Barnhill struck a 12-inch natural gas line while doing work, a spokesperson for the Department of Transportation said.

Repairs were extensive.

A Motel 6 was evacuated, while about 45 people were affected.

More: [WTVD](#)

SOUTH DAKOTA

PUC Approves NorthWestern Rate Hike

The Public Utilities Commission on Jan. 9 approved a rate hike for NorthWestern Energy that will help the utility pay for the Bob Glanzer Generating Plant, as well as \$267 million in overall infrastructure investments.

NorthWestern originally proposed to increase base electric revenues from customers by nearly \$31 million (16.32%). In the end, the company and the PUC reached a settlement for \$21.52 million. Under the new arrangement, the typical residential customer will see an increase of \$13.67 in their monthly bill.

More: [Mitchell Republic](#)

TEXAS

Explosion at Fort Worth Hotel Injures 21

Twenty-one people were injured Jan. 8 because of a gas explosion at the downtown Sandman Hotel.

Although the area smelled like gas following the explosion, the initial cause is still under investigation.

One patient is reported as critically injured and four are seriously injured. All the other patients reported minor injuries.

More: [KTVT](#)

WISCONSIN

Superior Mayor Wants PSC to Revisit Gas Plant Approval



Superior Mayor **Jim Paine** sent the Public Service Commission a letter Jan. 2 asking the commission to conduct a new review of the proposed Nemadji Trail Energy Center.

Paine noted the site is about 500 feet from a mass grave that holds the remains of tribal ancestors of the Fond du Lac Band

of Lake Superior Chippewa. He also added that federal funding and advancements in technology have made it possible to pursue renewable resources, rendering new fossil fuel plants "obsolete."

Several utilities, including the Dairyland Power Cooperative, Minnesota Power and the Basin Electric Power Cooperative, want to build the 625-MW, \$700 million gas plant as part of plans to shift away from coal and

invest in renewable energy.

A PSC spokesperson said the commission is reviewing the mayor's request.

More: [Wisconsin Public Radio](#)

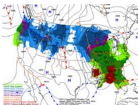
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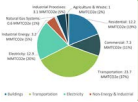
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