



Brent K. Oberlin
Director, Transmission Planning

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Joint ISO/RTO Planning Committee (JIPC)

PJM
2750 Monroe Boulevard
Audubon, PA 19403

New York ISO
10 Krey Boulevard
Rensselaer, NY 12144

ISO New England
1 Sullivan Road
Holyoke, MA 01040

Dear Members of the JIPC:

ISO New England requests the JIPC perform the necessary coordinated study(s) to determine the feasibility of raising the minimum loss of source value for New England from an existing level of 1,200 MW to a proposed level of 2,000 MW. ISO New England has reviewed the Amended and Restated Northeastern ISO/RTO Planning Coordination Protocol,¹ and believes that Section 6, Periodic Interregional Assessments and System Expansion Planning Studies, supports the requested study work.

As you are well aware, upon loss of a large source in New England, inertial pickup causes increased flows through both the New York and PJM systems. Under certain conditions on these two systems, these increased flows may have the potential to cause voltage collapse, compromising the reliability of the New York and/or PJM systems and, at worst, leading to widespread blackouts. ISO New England's loss of source limit is established by a joint PJM/NYISO/ISO-NE operating arrangement documented in the Procedure to Protect for the Loss of Phase II Imports² to ensure that reliability in both the New York and PJM systems is maintained. The operating arrangement requires both PJM and NYISO to operate such that New England's real-time loss of source limit will be at least 1,200 MW. Depending on system conditions in PJM and NYISO, this limit can be raised in real-time to a maximum of 2,000 MW.

Since New England cannot be assured on any given day that the loss of source limit will be greater than 1,200 MW, ISO New England reflects the 1,200 MW limit in its system design. One particular limitation of interest to the region is that newly interconnected New England resources are limited in size so that the

¹ https://www.iso-ne.com/static-assets/documents/committees/comm_wkgrps/otr/ipsac/rto_plan_prot/planning_protocol.pdf.

² [ISO New England Transmission, Markets and Services Tariff - Attachment G, https://www.iso-ne.com/static-assets/documents/regulatory/tariff/attach_g/attachment_g.pdf](https://www.iso-ne.com/static-assets/documents/regulatory/tariff/attach_g/attachment_g.pdf).

largest loss of source for any design contingency is 1,200 MW or less.³ As the region moves forward with the interconnection of large scale renewables, such as offshore wind resources, project developers may identify proposals that could be sized larger than 1,200 MW. The 1,200 MW limitation could constrain an otherwise optimal interconnection design.

Therefore, ISO New England is requesting evaluation of the loss of source limit to assess whether the current ISO-NE/NYISO/PJM systems could already allow the minimum loss of source limit to be raised above 1,200 MW, and if so, to what level. Building on this assessment, if the minimum loss of source limit with the existing system is still below 2,000 MW, ISO New England is requesting an additional assessment be performed to determine potential ISO-NE/NYISO/PJM upgrades, including estimated cost, necessary to support a 2,000 MW minimum loss of source limit. This information would be extremely helpful to inform the region as it considers next steps.

If you have any questions regarding this request, I am available at (413) 540-4512.

Sincerely,

/s/ Brent Oberlin

Brent Oberlin
Director, Transmission Planning

³ ISO New England Planning Procedure No. 5-6, Interconnection Planning Procedure for Generation and Elective Transmission Upgrades, Appendix A, https://www.iso-ne.com/static-assets/documents/rules_proceeds/isone_plan/pp05_6/pp5_6.pdf.