

July 11, 2016

**Via Electronic Mail & Hand Delivery**

Ms. Luly Massaro  
Division Clerk  
Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: *Invenergy, PUC Advisory Opinion, Docket No. 4609***

Dear Luly:

On behalf of Invenergy Thermal Development LLC (“Invenergy”), enclosed please find an original and five (5) redacted copies of the Pre-Filed Rebuttal Testimony of Ryan Hardy. Please note that Invenergy is also filing an original and one (1) copy of the unredacted (confidential) version of Mr. Hardy’s Rebuttal Testimony, in connection with the above docket.

A copy of the redacted version will be e-mailed to the service list. A copy of the unredacted/confidential version will be mailed, via Federal Express, to each of the parties that have signed a Non-Disclosure Agreement with Invenergy.

Please let me know if you have any questions.

Very truly yours,



ALAN M. SHOER  
[ashoer@apslaw.com](mailto:ashoer@apslaw.com)

Enclosures

cc: Service List (*via e-mail*)

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**PUBLIC UTILITIES COMMISSION**

**IN RE:            INVENERGY THERMAL DEVELOPMENT LLC            )  
                      APPLICATION TO CONSTRUCT AND            )            Dkt. 4609  
                      OPERATE THE CLEAR RIVER ENERGY            )  
                      CENTER, BURRILLVILLE, RHODE ISLAND            )**

**REBUTTAL TESTIMONY OF**

**Ryan Hardy**

**[ REDACTED/PUBLIC ]**

**1    1.1 INTRODUCTION**

**2    Q. PLEASE STATE YOUR NAME, BUSINESS TITLE AND BUSINESS ADDRESS.**

**3    A. My name is Ryan Hardy. I am a Member of Management at PA Consulting Group, Inc. My business  
4    address is 10 Canal Park, Cambridge, Massachusetts.**

**5    Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

**6    A. My testimony is on behalf of the applicant, Invenergy Thermal Development LLC ("Invenergy"), in  
7    support of their application for a license from the Rhode Island ("R.I.") Energy Facilities Siting Board  
8    ("EFSB" or the "Board") to construct the Clear River Energy Center project in Burrillville, Rhode Island  
9    ("Clear River"). I submitted Pre-Filed Direct Testimony on behalf of Invenergy, dated April 22, 2016.**

**10   Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

**11   A. To rebut claims made by Conservation Law Foundation ("CLF") witnesses Christopher Stix and  
12   Robert Fagan in their Pre-Filed Direct Testimonies, filed on June 14, 2016.**

**13   In particular, my rebuttal testimony serves to demonstrate that my previous analyses of the need for  
14   Clear River and ratepayer savings was not misleading nor unreasonable. My rebuttal testimony below  
15   demonstrates that my pre-auction analysis conducted in the Fall of 2015 (before the Independent  
16   System Operator-New England's (ISO-NE) February 2016 capacity auction) was reasonable based on**

1 the best available information. Additionally, this rebuttal testimony demonstrates that my **post**-auction  
2 analysis incorporated into my Pre-Filed Direct Testimony on April 22, 2016 is reasonable and based on  
3 the best available information. Lastly, I should note that while the absolute dollars of ratepayer savings  
4 was reduced from my pre-auction to post-auction analysis, the overall conclusions and corresponding  
5 order of magnitude of these savings have not changed significantly.

6 **Q. HOW HAVE YOU STRUCTURED YOUR TESTIMONY?**

7 A. I have structured my testimony in three (3) parts, based on the primary critiques of my pre-filed  
8 testimony by CLF witnesses Mr. Stix and Mr. Fagan. The three (3) sections are: (i) assessment of  
9 need, (ii) ratepayer savings – capacity, and (iii) ratepayer savings - energy.

10 **1.2 ASSESSMENT OF NEED**

11 **Q. WHY IS THE FORWARD CAPACITY MARKET (“FCM”) THE APPROPRIATE MECHANISM TO**  
12 **DETERMINE THE NEED FOR CLEAR RIVER?**

13 A. As I describe in my pre-filed testimony, my understanding is that the Rhode Island Public Utilities  
14 Commission (“PUC”) will apply a liberalized standard to determine the need for Clear River, given that  
15 wholesale generation of electricity in New England is a competitive industry where the risk of success  
16 for such projects and the risks associated with the cost of construction is placed not on ratepayers, but  
17 on private investors. The FCM is the competitive free market mechanism that determines need for new  
18 power generating units in ISO-NE.

19 **Q. HAS THE PUC COMMENTED ON WHAT IS THE APPROPRIATE MECHANISM TO DETERMINE**  
20 **NEED?**

21 Yes. I believe the PUC explained this view in its Advisory Opinion in the Indeck-North Smithfield project  
22 (Docket No. 3094) (referred to as “Indeck Advisory Opinion”). In the Indeck Advisory Opinion, the PUC  
23 concluded that as a result of the Utility Restructuring Act of 1996 (“URA”), the URA has “effectively  
24 repealed by implication the much older need assessment provision of the” Energy Facilities Siting Act,  
25 thereby relaxing the standard of review required by the PUC. In the Indeck Advisory Opinion, the PUC  
26 concluded that “In this new era, the need for generating plants is performed by the free market,

1 and therefore the Commission certifies ‘need’ to the EFSB utilizing liberalized standards.”<sup>1</sup> (Emphasis  
2 added.) This is consistent with the PUC’s advisory opinions for Tiverton Power and Hope Energy.

3 **Q. IS THE FCM THE FREE MARKET MECHANISM THAT DETERMINES THE NEED FOR NEW**  
4 **GENERATING UNITS IN ISO-NE?**

5 A. Yes. As defined by ISO-NE, the FCM is the “long-term wholesale market that assures resource  
6 adequacy, locally and system-wide. The market is designed to promote economic investment in supply  
7 and demand resources **where they are needed most.**”<sup>2</sup> (Emphasis added.)

8 Note this is fully consistent with how Invenenergy described the FCM in its application before the EFSB,  
9 which Mr. Fagan erroneously criticizes. Invenenergy stated that “Forward Capacity Auctions (“FCA”) are  
10 utilized as a market-based approach to determine both system-wide and localized needs for both  
11 existing and new generation capacity through a competitive auction process designed to select the  
12 portfolio of existing and new resources needed for system-wide and local reliability with the greatest  
13 social surplus.” (EFSB Application, Section 7.1.2)  
14 Moreover, Mr. Stix appears to agree with this position in his pre-filed testimony when he states that “the  
15 purpose of these FCAs is basically to make sure that there will be enough electricity (that is, enough  
16 power generation capacity) here in New England to meet the expected load during that future one-year  
17 period.”<sup>3</sup>

18 **Q. DID MR. FAGAN OR MR. STIX SUGGEST AN ALTERNATIVE STANDARD TO THE FCM FOR**  
19 **DETERMINING NEED FOR A NEW GENERATING RESOURCE? IF SO, HAS THE ALTERNATIVE**  
20 **STANDARD BEEN PREVIOUSLY USED BY THE PUC, EFSB OR ISO-NE IN EVALUATING A NEW**  
21 **GENERATION FACILITY?**

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<sup>1</sup> In RE: Indeck-North Smithfield L.L.C. Need Assessment To Construct A Gas Fired Power Generation Facility, Docket No. 3094 (9/6/2000) at pp 6, copy attached as Exhibit A.

<sup>2</sup> In ISO-NE’s Introduction to New England’s Forward Capacity Market ISO, pg 5 (Attached as Exhibit A, and available at the following web site: <http://www.iso-ne.com/static-assets/documents/2014/08/iso101-t4-mkt-fcm.pdf>)

<sup>3</sup> Pre Filed Testimony of Mr. Stix, Lines 7-9 on Page 7.

1 A. No. Neither Mr. Fagan nor Mr. Stix focused on what standard should be used to determine need.  
2 Instead, they focused on why they believe Clear River is not needed, despite the fact that the free  
3 market has already determined that the facility is needed.

4 **Q. IS MR. FAGAN'S ASSESSMENT OF THE 'NEED' FOR NEW CAPACITY FUNDAMENTALLY**  
5 **FLAWED?**

6 A. Yes. Mr. Fagan erroneously asserts that "a proposed resource such as the Invenergy plant clearing  
7 the FCA means that the resource obtains a capacity supply obligation — a financial obligation — but it  
8 doesn't mean that the resource is physically needed for reliability." (Page 12, lines 2-5.)

9 This is the critical assumption that underpins his argument and is factually incorrect. Clearing an FCA  
10 determines that a facility is needed by ISO-NE to maintain reliability for that delivery year.

11 **Q. SO, ARE YOU SAYING THAT CLEARING THE CAPACITY MARKET (I.E., OBTAINING A**  
12 **CAPACITY SUPPLY OBLIGATION) IS A PHYSICAL OBLIGATION TO PROVIDE CAPACITY TO**  
13 **SATISFY RELIABILITY?**

14 A. Yes, in contrast to Mr. Fagan's assertion that a capacity supply obligation is only a "financial  
15 obligation," clearing ISO-NE's capacity market constitutes a physical obligation to perform such  
16 obligations and are required by ISO-NE to meet reliability.

17 **Q. IS YOUR VIEW SUPPORTED BY ISO-NE'S MARKET RULES?**

18 Yes. According to ISO-NE Market Rule 1 (attached as **Exhibit B**), Section III.13, "a Capacity Supply  
19 Obligation is an obligation to provide capacity from a resource." In other words, it is a physical  
20 obligation to provide capacity and not just a financial obligation.

21 According to ISO-NE Market Rule 1, Section III.13.6.1.1.1, "a Generating Capacity Resource having a  
22 Capacity Supply Obligation shall be offered into both the Day-Ahead Energy Market and Real-Time  
23 Energy Market at a MW amount equal to or greater than its Capacity Supply Obligation **whenever the**  
24 **resource is physically available.**" (Emphasis added.)(attached as **Exhibit C**).<sup>4</sup> In other words, if a

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<sup>4</sup> The complete ISO-NE Section III Market Rule 1, Standard Market Design is available at the following web site: [http://www.iso-ne.com/static-assets/documents/2014/12/mr1\\_sec\\_1\\_12.pdf](http://www.iso-ne.com/static-assets/documents/2014/12/mr1_sec_1_12.pdf)

1 resource clears an auction it has taken on a physical commitment to provide capacity and energy, and  
2 ISO-NE relies on that commitment in order to maintain reliability.

3 **Q. IS MR. FAGAN CORRECT IN HIS ASSERTION THAT INVENERGY “IGNORES OR MINIMIZES**  
4 **THE EFFECT” OF ENERGY EFFICIENCY AND BEHIND-THE-METER SOLAR PV?**

5 A. No. At the time of my analysis for Invenergy, I incorporated ISO-NE’s latest official forecast on  
6 energy efficiency and behind-the-meter solar PV. This is the same view that ISO-NE uses in the  
7 development of the Net Installed Capacity Requirement (“NICR”), which is used by ISO-NE to  
8 determine need in an FCA.

9 **Q. DOES THE FACT THAT ISO-NE PROCURED CAPACITY ABOVE THE NICR IN FCA 10 MEAN**  
10 **THAT CLEAR RIVER IS NOT NEEDED, AS MR. STIX AND MR. FAGAN CLAIM?**

11 A. No. Mr. Fagan’s and Mr. Stix’s argument to the contrary demonstrates a fundamental lack of  
12 understanding of both the purpose of the FCM and how results are determined in any particular FCA.  
13 All units that cleared FCA 10, including Clear River, face a binding commitment to provide capacity in  
14 New England to maintain reliability. By clearing the auction, Clear River was determined by the free  
15 market to be needed. Moreover, ISO-NE explicitly stated after FCA 10 that the new resources that  
16 cleared FCA 10 are needed. In its press release following the auction, ISO-NE affirmed that FCA 10  
17 “provided the incentives for developers to bring new—and needed—resources to the market.”<sup>5</sup>  
18 (Emphasis added.)

19 **Q. WHY DID ISO-NE PROCURE CAPACITY ABOVE THE NICR?**

20 A. The NICR is the minimum amount of capacity needed to meet ISO-NE’s reliability target. However,  
21 meeting the NICR is only one component of need. ISO-NE’s FCM is designed to determine need not  
22 just in terms of meeting the absolute minimum amount of capacity needed to maintain reliability, but  
23 also to maximize the overall value to the ratepayer. ISO-NE calls this maximization of value,  
24 maximizing social surplus.

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<sup>5</sup> ISO-NE. Press Release: ISO-NE Capacity Auction Secures Sufficient Power System Resources, At a Lower Price, for Grid Reliability in 2019-2020. February 11, 2016. p 1, copy attached as Exhibit D.

1 In its explanation of the FCA 10 results to FERC, in its Forward Capacity Auction Results Filing on  
2 February 29, 2016 (Page 6, Lines 6 to 11, attached as **Exhibit E**), ISO-NE explicitly highlighted this  
3 need. ISO-NE stated, "in the specific area where supply and demand intersect [in an FCA], the  
4 presence of nonrationable offers may present a number of potential solutions regarding which  
5 resources should clear and at what prices. In order to determine which resources should clear, at what  
6 quantities and at what price, the ISO utilizes the FCM capacity clearing engine. The objective of the  
7 capacity clearing engine is to maximize social surplus."

8 **Q. DOES THAT MEAN ISO-NE DETERMINED IN FCA 10 THAT THERE WAS A NEED FOR**  
9 **CAPACITY ABOVE THE NICR TO MAXIMIZE SOCIAL SURPLUS?**

10 Yes. When the marginal supply offers in the auction do not perfectly correspond with the NICR, the  
11 FCA process evaluates every possible combination of supply offers in the auction to maximize social  
12 surplus. Ultimately, ISO-NE selects the most optimal economic solution that meets the NICR.  
13 Removing a resource that is part of the most optimal economic solution by definition creates a less  
14 optimal economic outcome for the ratepayer and greater risk that the needed resources and value will  
15 not be delivered to the ratepayer. In other words, all cleared capacity in an FCA is needed by ISO-NE in  
16 order to maximize the value for the ratepayer in meeting its reliability target, and the ISO-NE specified  
17 that Invenergy cleared 485 MW in the FCA 10.

18 **Q. IN SUMMARY, YOU ARE SAYING CLEAR RIVER'S CLEARED CAPACITY IS NEEDED BY ISO-**  
19 **NE TO ENSURE RELIABILITY AND MAXIMIZE SOCIAL SURPLUS FOR RATEPAYERS?**

20 A. Yes.

21 **Q. ARE THERE OTHER ASPECTS TO NEED THAT YOU HAVE NOT DISCUSSED?**

22 A. Yes. One such example is highlighted by the PUC in the Indeck Advisory Opinion. The PUC found  
23 that "even if sufficient generation exists, replacement of inefficient, old plants with clean, efficient new  
24 plants will have the effect of improving the overall total effectiveness of generation and constitutes  
25 'need'." (Indeck Advisory Opinion in Docket 3094 (9/6/2000) at pg. 7).

1 As a clean and highly-efficient generation facility, Clear River will help phase out less efficient and  
2 highly polluting resources in the ISO-NE region, which includes Rhode Island. This is explained in more  
3 detail in my April 22, 2016 Pre-Filed Testimony on the positive impacts of Clear River on regional  
4 emissions and energy savings to Rhode Island ratepayers by displacing less efficient generation. This  
5 displacement of older less efficient power generation is also consistent with the PUC's standard for  
6 determining wholesale market need.

### 7 **1.3 RATEPAYER SAVINGS – CAPACITY**

8 **Q. WAS YOUR PRE-AUCTION FORECAST OF FCA 10 REASONABLE BASED ON THE**  
9 **FUNDAMENTAL OUTLOOK FOR THE MARKET AT THAT TIME?**

10 A. Yes. My forecast of FCA 10 was absolutely reasonable.

11 One method to test reasonableness is to compare my pre-auction forecast against the actual auction  
12 results and against the expectations of other third party estimates prior to the auction. Based on  
13 publically available information, I was able to identify three pre-FCA 10 third-party estimates against  
14 which to compare my forecast. The three parties I identified are Morgan Stanley, Goldman Sachs, and  
15 UBS Securities.

16 **Q. HOW DO THE ACTUAL AUCTION RESULTS AND THE THIRD PARTY ESTIMATES OF THE**  
17 **FCA 10 CLEARING PRICE COMPARE TO YOUR FORECAST?**

18 The range of **pre-auction** estimates for the FCA 10 clearing prices are:

- 19 • UBS Securities estimated \$██████/kW-mo.<sup>6</sup>
- 20 • Morgan Stanley estimated a range of \$██████/kW-mo.<sup>7</sup>
- 21 • My estimate was \$██████/kW-mo.

22 As you can see, my pre-auction estimate was the most conservative and most accurate prediction of all  
23 pre-auction estimates. As a reminder, the actual clearing price for FCA 10 was \$7.03/kW-mo. This is  
24 less than a █████% difference from my forecast.

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<sup>6</sup> As reported in SNL Energy's Capacity Market Page (1/8/2016). Attached in Exhibit F

<sup>7</sup> As reported in SNL Energy's Capacity Market Page (2/8/2016). Attached in Exhibit F



1 Additionally, my pre-auction estimate for the FCA 10 clearing price without Clear River clearing the  
2 auction was \$ [REDACTED] kW-mo. [REDACTED]

3 [REDACTED]

4 **Q. PLEASE EXPLAIN THE SIGNIFICANCE OF YOUR ACCURATE ESTIMATE/PREDICTION OF**  
5 **THE FCA 10 CLEARING PRICE?**

6 A. It demonstrates the reasonableness of my approach in projecting FCA clearing prices, which  
7 therefore should provide confidence in my estimated future ratepayer savings. In other words, my  
8 approach is consistent, accurate, and certainly not misleading.

9 **Q. SO, DO YOU AGREE WITH MR. STIX'S STATEMENT (PG 25, LINES 10-13) IN REFERENCE TO**  
10 **YOUR "ACCURATE PROJECTIONS" THAT "NONE OF THE FACTORS CITED BY MR. HARDY**  
11 **WILL HAVE A MATERIAL EFFECT ON THE PRICE PAID FOR ELECTRICITY BY RHODE ISLAND**  
12 **RATEPAYERS"?**

13 A. I absolutely disagree with Mr. Stix's statement. The auction clearing price is one of the most  
14 important fundamental factors impacting the price Rhode Island customers will pay for electricity in  
15 coming years.

16 **Q. DID YOU UPDATE YOUR ANALYSIS POST-FCA 10?**

17 A. Yes. I updated my analysis and it was incorporated in my pre-filed testimony on April 22, 2016.

18 **Q. DID MR. STIX'S PRE-FILED TESTIMONY ON JUNE 14, 2016 COMPARE HIS POST-AUCTION**  
19 **FCA 10 ANALYSIS WITH YOUR POST-AUCTION ANALYSIS IN YOUR PRE-FILED TESTIMONY**  
20 **ON APRIL 22, 2016?**

21 A. Absolutely not. Mr. Stix chose to ignore my post-auction analysis completely in his comparison.  
22 Instead, he compared my pre-auction analysis with his post-auction analysis. This is despite the fact  
23 his June 14, 2016 pre-filed testimony routinely cited my April 22, 2016 pre-filed testimony, including the  
24 fact that I revised my results based on the FCA 10 results.

25 **Q. IS MR. STIX'S COMPARISON OF YOUR PRE-AUCTION ANALYSIS WITH MR. STIX'S POST-**  
26 **AUCTION ANALYSIS REASONABLE?**

1 A. Not really. A more honest comparison would be to compare a **pre-auction** estimate he made with my  
2 **pre-auction** estimates or compare my **post-auction** estimates with his **post-auction** estimates. Mixing  
3 and matching comparisons between pre- and post-auction estimates amounts to cherry picking to serve  
4 his purposes to unreasonably attack my testimony. As I describe above, my estimates pre-auction were  
5 reasonable, proven accurate and based on the best information at the time.

6 **Q. HOW DOES MR. STIX'S POST-AUCTION ESTIMATE OF THE CLEARING PRICE FOR FCA 10**  
7 **WITHOUT CLEAR RIVER COMPARE TO YOUR POST-AUCTION ESTIMATE OF THE FCA 10**  
8 **CLEARING PRICE WITHOUT CLEAR RIVER?**

9 A. Mr. Stix's post-auction estimate for the Clearing Price without Clear River is a range between  
10 \$7.03/kW-mo (the FCA 10 Clearing Price) and \$8.50/kW-mo for FCA 10 (his analysis of the impact  
11 without Clear River). My post-auction estimate for the Clearing Price without Clear River is \$██████/kW-  
12 mo for FCA 10. This is a less than ██% difference from the upper end of his range. Given I used the  
13 same exact methodology between my pre-auction and post-auction analysis and our post-auction  
14 results are similar, it should further underscore to Mr. Stix that my pre-auction methodology was sound  
15 and reasonable.

16 **Q. IN YOUR POST-AUCTION ANALYSIS USED IN YOUR APRIL 22, 2016 PRE-FILED DIRECT**  
17 **TESTIMONY, WHAT WAS THE CAPACITY PRICE SAVINGS FOR RHODE ISLAND CUSTOMERS**  
18 **FOR FCA 10 WITH THE INCLUSION OF CLEAR RIVER, AND HOW DOES THIS COMPARE WITH**  
19 **MR. STIX'S ESTIMATE IN HIS PRE-FILED TESTIMONY ON JUNE 14, 2016?**

20 A. My updated estimate in capacity price savings for Rhode Island customers due to Clear River  
21 clearing in FCA 10 for the FCA 10 Delivery Year (i.e., June 2019 through May 2020) was \$39.4 million.  
22 Mr. Stix estimated up to \$36 million in potential savings for Rhode Island customers in this same time  
23 period due to Clear River clearing in FCA 10 (see Mr. Stix Pre-Filed Direct Testimony, at page 20, lines  
24 9-11). These values are within 10%.

25 **Q. HAS MR. STIX CHOSEN TO IGNORE YOUR UPDATED POST-AUCTION ANALYSIS?**

26 A. It appears Mr. Stix has focused his criticism of my testimony entirely on my pre-auction forecast.

1 **Q. WHY WAS YOUR PRE-AUCTION ESTIMATE OF RATEPAYER SAVINGS (CONDUCTED IN THE**  
2 **FALL OF 2015) HIGHER THAN YOUR POST-AUCTION ESTIMATE, DESPITE BEING VERY CLOSE**  
3 **ON THE FCA 10 AUCTION PRICE?**

4 A. Half of the capacity I projected that Clear River would bid into the FCA and clear did not clear FCA  
5 10. Note that I projected that [REDACTED] MW of new combined cycle generation would clear FCA 10. This  
6 compares with 969 MW of new combined cycle generation that actually cleared FCA 10. This is an  
7 approximately [REDACTED]% difference. In my post-FCA 10 analysis, I only attributed ratepayers savings related  
8 to Clear River's impacts (i.e., 485 MW of cleared capacity), and not the additional 484 MW of combined  
9 cycle capacity that cleared. However, Rhode Island ratepayers are receiving savings associated with  
10 this 484 MW of incremental capacity that cleared, however, those savings can now be attributable to  
11 the other combined cycle resource that cleared FCA 10 (Bridgeport Harbor).

12 **Q. CAN YOU COMPARE YOUR POST-AUCTION ESTIMATE OF CAPACITY PRICE SAVINGS**  
13 **FROM 2019 TO 2022 FOR RHODE ISLAND CUSTOMERS TO MR. STIX'S ESTIMATE FOR THE**  
14 **SAME TIME PERIOD?**

15 A. No, I cannot. The estimate of capacity price savings for Rhode Island customers I provided in my  
16 pre-filed testimony, based on my post-auction analysis, was \$170 million from 2019-2022, or \$42  
17 million annually on average. Mr. Stix did not provide estimates through 2022.

18 **Q. IS MR. STIX'S ANALYSIS OF FCA 11 FUNDAMENTALLY FLAWED?**

19 A. Yes. Mr. Stix makes a number of very questionable assumptions and basic errors that are critical to  
20 appropriately forecasting FCA 11.

21 **Q. CAN YOU IDENTIFY SOME OF THE BASIC ERRORS IN MR. STIX'S ANALYSIS?**

22 A. Yes. Mr. Stix claims that the "CONE" or Cost of New Entry value for FCA 11 is \$11.64/kW-mo. (Pg.  
23 35, Line 10) That is incorrect. The correct CONE value for FCA 11 is \$14.39/kW-mo. The value  
24 \$14.39/kW-mo comes directly from ISO-NE's FCM Parameters document, attached as Exhibit G. Mr.  
25 Stix likely meant to refer to Net CONE, which is the Cost of New Entry after expected energy margins  
26 are taken into account.

1 Additionally, in multiple instances, Mr. Stix refers to the "ICR" or Installed Capacity Requirement, when  
2 what he is likely intending to refer to is "NICR" or Net Installed Capacity Requirement. For example, on  
3 page 32 line 18 of his pre-filed testimony, he claims that the table below his text refers to the ICR  
4 whereas the table he refers to actually shows NICR values. Similarly, on page 32 line 15 Mr. Stix  
5 incorrectly claims that the ICR for FCA 10 was 34,151 MW. This figure is actually the NICR for FCA 10,  
6 whereas the ICR for FCA 10 was 35,126 MW. The NICR takes into account imported capacity from  
7 Hydro Quebec, which ISO-NE does not include in its auctions. In other words, it is the NICR that  
8 ultimately matters when determining the clearing price FCA 11, not the ICR. There is an approximately  
9 1,000 MW difference between the two values.

10 Mr. Stix has either confused or intentionally misrepresented these two very basic concepts, which does  
11 not give me confidence in his overall analysis.

12 **Q. DO YOU HAVE OTHER CONCERNS ABOUT MR. STIX'S FCA 11 ANALYSIS?**

13 A. Yes. Mr. Stix deviates from ISO-NE's standard methodology by relying on an inappropriate demand  
14 forecast comparison in his description of how he developed the NICR (which he inappropriately refers  
15 to as the ICR).

16 There are three primary peak demand metrics included in ISO-NE's CELT Report, which is ISO-NE's  
17 own load forecast: 1) gross forecast; 2) gross forecast reduced for behind-the-meter PV; and 3) gross  
18 forecast reduced for both behind-the-meter PV and passive demand resources. The input that ISO-NE  
19 uses to develop its NICR is the second of those three forecasts, which is gross forecast net of behind-  
20 the-meter PV. This is the same forecast I relied on.

21 According to ISO-NE's tariff, in Market Rule 1 Section III.12.8 (attached as **Exhibit H**), "expected  
22 reductions from an installed or forecast Demand Resource that qualifies to participate in the Forward  
23 Capacity Market... shall not be reflected as a reduction in the load forecast that will be used to  
24 determine the Installed Capacity Requirement." Since passive demand response participates in the  
25 FCM, ISO-NE does not include it in on the demand side in the development of the NICR.

1 In contrast, Mr. Stix used the third of the metrics I highlight above, which is the gross forecast net of  
2 behind-the-meter PV and passive demand resources.

3 In other words, Mr. Stix came to a flawed estimation of the decrease in demand by 611 MW relative to  
4 FCA 10 by using an inappropriate demand forecast. This further undercuts his analysis.

5 **Q. DOES YOUR CRITIQUE MEAN THAT MR. STIX'S CLAIM (on Page 33, lines 14-15) THAT THE**  
6 **CLEARING PRICE WOULD BE REDUCED BY UP TO \$2.65/KW-MO BASED ON THE REDUCTION**  
7 **IN NICR FROM THE 2016 CELT REPORT IS INCORRECT?**

8 A. Yes. It is incorrect, since Mr. Stix's estimate of decreased demand of 611 MW is an invalid  
9 assumption that results from a very basic misunderstanding of how the NICR is properly calculated.

10 **Q. CAN YOU PROVIDE OTHER INAPPROPRIATE ASSUMPTIONS MADE BY MR. STIX IN HIS FCA**  
11 **11 ANALYSIS?**

12 A. Yes. In his analysis of new capacity additions, (at pg. 37, lines 1-7) Mr. Stix assumes that Clean  
13 Energy Connect, a 600 MW resource, will clear FCA 11 at a price of \$5.50/kW-mo. Clean Energy  
14 Connect is not yet even in the ISO-NE interconnection queue as of the date of this rebuttal testimony,  
15 and similar projects such as Northern Pass have not yet even qualified for an FCA, let alone bid in and  
16 cleared. It is therefore inappropriate to include this capacity in his assumptions.

17 **Q. IN HIS RATEPAYER SAVINGS ANALYSIS (ON PAGE 33, LINE 16) MR. STIX USES A 300 MW**  
18 **DECREASE IN DEMAND VERSUS A 611 MW DECREASE IN DEMAND TO BE "CONSERVATIVE."**  
19 **BASED ON A NICR DECREASE OF 300 MW AND 35,804 MW OF CLEARED CAPACITY IN FCA 11,**  
20 **THE LATTER OF WHICH MR. STIX ASSUMES IN HIS ANALYSIS, WHAT WOULD YOU EXPECT**  
21 **THE CLEARING PRICE OF FCA 11 TO BE?**

22 A. I would expect the clearing price in FCA 11 to be approximately \$[REDACTED], nearly [REDACTED]% less than  
23 Mr. Stix's projected price of \$5.50/kW-mo. This would result in significantly more estimated ratepayer  
24 savings than Mr. Stix claims in his flawed analysis.

25 **Q. WHY IS THAT?**

1 A. Mr. Stix estimates that the FCA 11 clearing price would be \$6.64/kW-mo if Clear River did not clear  
2 at all in FCA 11 (Pg. 41, Lines 1-10). He says that the maximum difference in clearing prices would be  
3 \$1.14/kW-mo, which is based on the difference between this \$6.64/kW-mo value and his \$5.50/kW-mo  
4 value. With my estimation of approximately \$ [REDACTED] (using his flawed assumptions), the difference  
5 would expand from \$1.14/kW-mo to \$ [REDACTED] and ratepayer savings would nearly [REDACTED] relative  
6 to the \$28 million Mr. Stix is projecting (i.e. nearly \$ [REDACTED]).

7 **Q. MR. STIX CLAIMED THAT COMPARING PA'S PRE-AUCTION ESTIMATE OF RATEPAYER**  
8 **SAVINGS FOR FCA 11 TO HIS POST-AUCTION ESTIMATE IS "APPLES-TO-APPLES." (SEE**  
9 **PAGE 21, LINE 2.) DO YOU AGREE WITH THIS STATEMENT?**

10 A. No, I do not. Again, Mr. Stix has inappropriately cherry-picked the incorrect analysis by comparing  
11 my **pre-FCA 10** analysis and his **post-FCA 10** auction analyses.

12 **1.4 RATEPAYER SAVINGS – ENERGY**

13 **Q. IS THE ANALYSIS PUT FORTH BY MR. STIX ON CUMULATIVE ENERGY PRICE IMPACTS**  
14 **FLAWED?**

15 A. Yes. Mr. Stix did not forecast or make any independent calculations outside of adding up forecasted  
16 energy price impacts from a number of difference sources.

17 **Q. SO, YOU ARE SAYING THE ARGUMENT PUT FORTH BY MR. STIX OF ADDING UP**  
18 **DIFFERENT FORECASTED IMPACTS TO DERIVE A CUMULATIVE ENERGY PRICE IMPACT IS**  
19 **FLAWED?**

20 A. Yes. The argument put forth by Mr. Stix regarding the cumulative impact of new generators on  
21 energy prices in ISO-NE is severely flawed. In particular, Mr. Stix's analysis does not consider key  
22 locational considerations of energy pricing and improperly aggregates multiple data sources.

23 **Q. PLEASE EXPLAIN WHAT YOU MEAN BY LOCATIONAL CONSIDERATIONS?**

24 A. The ISO-NE power market is not a homogenous electricity market, meaning consumers of electricity  
25 do not pay the same price for energy across New England. In contrast, the market is built up of over a  
26 thousand Locational Marginal Prices ("LMP"), which represent the price of power at specific locations in

1 the region. These prices are often grouped together into pricing zones, which represent average prices  
2 for a collection of individual LMPs within the zone. For example, PA's analysis of price impacts from  
3 Clear River considers impacts to pricing in the Rhode Island Zone, which represents a set of LMPs  
4 primarily within the state of Rhode Island.

5 **Q. WHY ARE LOCATIONAL CONSIDERATIONS IMPORTANT IN REGARDS TO MR. STIX'S**  
6 **ANALYSIS?**

7 A. Energy price savings from the introduction of a new power project tend to be stronger the closer the  
8 pricing point being examined is to the location of the project. For instance, you can generally expect the  
9 energy price impacts of Clear River to be stronger in the Rhode Island Zone than compared to more  
10 distant locales such as the Maine Zone. Simply stated, Clear River will have a stronger impact on  
11 Rhode Island's energy prices than on Maine's energy prices.

12 I note that all of the other projects beyond Clear River that Mr. Stix considers are outside of the Rhode  
13 Island Zone. For this reason, it is unreasonable and inaccurate to take individual zonal price impacts  
14 from a range of different zones and add them together and represent this as the impact to the ISO-NE  
15 system as a whole. In this context, location matters. The methodology Mr. Stix used simply aggregates  
16 energy price savings across locations throughout New England to support his analysis and to criticize  
17 my testimony. This leads to a flawed analysis on his part.

18 **Q. DO YOU HAVE OTHER CONCERNS OVER THE AGGREGATION OF DIFFERENT DATA**  
19 **SOURCES IN MR. STIX ANALYSIS?**

20 A. Yes. Beyond failing to normalize for specific locational issues, Mr. Stix aggregates analyses  
21 conducted by various consulting firms at different points in time. Even if one were to normalize for  
22 locational impacts between these forecasts, it is important to recognize that Mr. Stix relied on different  
23 analyses using different assumptions. For example, it is highly unlikely that Mr. Stix accounted for  
24 differences in fuel prices, load growth, transmission flow, carbon prices and other important variables in  
25 his analysis. Without a consistent set of assumptions, simply adding up the impacts is wildly  
26 inappropriate as those assumption differences could impact the locational and relative price impacts of

1 those projects and may overstate the combined impact. In other words, without accounting for those  
2 differences, Mr. Stix is comparing apples-to-oranges.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 A. Yes, it does.



# EXHIBIT

A

# Introduction to New England's Forward Capacity Market

*ISO 101*

### **Disclaimer for Customer Training**

ISO New England (ISO) provides training to enhance participant and stakeholder understanding.

Because not all issues and requirements are addressed by the training, participants and other stakeholders should not rely solely on this training for information but should consult the effective Transmission, Markets and Services Tariff (“Tariff”) and the relevant Market Manuals, Operating Procedures and Planning Procedures (“Procedures”).

In case of a discrepancy between training provided by ISO and the Tariff or Procedures, the meaning of the Tariff and Procedures shall govern.

# Introduction to New England’s Forward Capacity Market

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### ***Excerpt from:***

**Overview of New England’s Wholesale Electricity Markets and Market Oversight**

*ISO New England Inc.*

*Internal Market Monitor*

*May 6, 2014*



## Forward Capacity Market

The Forward Capacity Market is a long-term wholesale market that assures resource adequacy, locally and systemwide. The market is designed to promote economic investment in supply and demand resources where they are needed most. Capacity resources may be new or existing resources and include supply from power plants, import capacity, or the decreased use of electricity through demand resources. To purchase enough qualified resources to satisfy the region's future needs and allow enough time to construct new capacity resources, Forward Capacity Auctions (FCAs) are held each year approximately three years in advance of when the capacity resources must provide service. Capacity resources compete in the annual FCA to obtain a commitment to supply capacity in exchange for a market-priced capacity payment.

This section describes the design of the Forward Capacity Market and FCAs as well as the financial-assurance mechanisms and oversight procedures in place for this market.

### Capacity Requirements

The capacity needed to satisfy the region's systemwide future load and reliability requirements is called the *Installed Capacity Requirement (ICR)*.<sup>1</sup> The *net Installed Capacity Requirement (NICR)* value is the ICR for the region, minus the tie-reliability benefits associated with the Hydro-Québec Phase I/II Interface (termed HQICCs).<sup>2</sup> Other key FCM inputs include locational capacity needs. These ensure that local areas secure sufficient capacity during the auction to maintain reliability when transmission constraints prevent the system from delivering the needed electric energy to the area. The transmission system constraints are based on the existing system network topology and transmission system upgrades certified by transmissions owners to be *in service* by the first day for the relevant capacity commitment period (CCP).<sup>3</sup> Transmission projects projected to go in service during the year are not included in the FCM auction assumption.

The locational information is provided for specific *capacity zones* (i.e., geographic subregions of the New England Balancing Authority Area that may represent load zones that are export constrained, import constrained, or contiguous—neither export nor import constrained). Import-constrained areas are assigned a *local sourcing requirement (LSR)* (i.e., the minimum amount of capacity that must be electrically located within these areas to meet the ICR). Export-constrained areas are assigned a *maximum capacity limit (MCL)*—the maximum amount of capacity that can be procured in these areas to meet the ICR.

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<sup>1</sup> The ICR is the minimum amount of resources (level of capacity) a balancing authority needs in a particular year to meet its resource adequacy planning criterion, according to the Northeast Power Coordination Council (NPCC) Regional Reliability Reference Directory #1 *Design and Operation of the Bulk Power System*. This criterion states that the probability of disconnecting any firm load because of resource deficiencies shall be, on average, not more than 0.1 day per year. The ICR is calculated in accordance with *Market Rule 1*, Section III.12 and is filed with FERC before each auction. For additional information on the loss-of-load-expectation criterion, refer to ISO New England's Planning Procedure No. 3 (PP 3), *Reliability Standards for the New England Area Bulk Power Supply System* (March 1, 2013), [http://www.iso-ne.com/rules\\_proceeds/isone\\_plan/pp03/index.html](http://www.iso-ne.com/rules_proceeds/isone_plan/pp03/index.html), and NPCC criteria, <https://www.npcc.org/Standards/default.aspx> and <https://www.npcc.org/Standards/Directories/Forms/Public%20List.aspx>.

<sup>2</sup> As defined in the ISO's tariff, the HQICC is a monthly value that reflects the annual installed capacity benefits of the HQ Interconnection, as determined by the ISO using a standard methodology on file with FERC.

<sup>3</sup> *In service* is when a unit or transmission line is available for use. A *capacity commitment period*, also known as a *capability year*, runs from June 1 through May 31 of the following year.

During each FCA, existing capacity resources are limited to a service period of one capacity commitment period, while new resources may commit to as many as seven<sup>4</sup> such periods at the FCA price. Performance penalties for delivery shortfalls during the service period ensure that resources purchased through the auction will be available when needed.

## Resource Qualification

Because only resources with a capacity supply obligation (CSO) are required to offer into the Day-Ahead Energy Market, and because only the ICR amount is procured in the auction, it is critical for each FCA to procure only those capacity resources that will be commercial and available at the beginning of each capability year.<sup>5</sup> Although generating, demand, and import resources all may participate in the FCA to receive a CSO, the FCA treats new and existing capacity resources differently. Each type of resource has a distinctive qualification process designed to determine the amount of qualified capacity a particular resource can supply and to certify that each resource reasonably can be expected to be available during the relevant commitment period (approximately three years after the auction).

### Existing Capacity Resource Qualification

The qualification process for existing capacity resources begins with the ISO's determination of each resource's *summer* and *winter qualified capacity*.<sup>6</sup> For generating capacity resources, the qualified capacity value relies on a resource's demonstrated performance over the previous five years. The summer and winter qualified capacity values for demand resources are calculated based on the sum of the previous qualified existing capacity and any incremental capacity that clears in the prior FCA.

At least two weeks before the existing capacity qualification deadline, the ISO notifies existing resources of their qualified capacity to allow time for participants to verify that their qualified capacity is correct or to seek redress by demonstrating that a different capacity quantity is appropriate. All existing resources are automatically entered into the capacity auction at their qualified value and assume a capacity supply obligation for the relevant commitment period, unless they submit a "delist bid" that subsequently clears in the auction.

### Delist Bids

An existing resource can submit a *delist bid* for opting out of the capacity market for one year or permanently if the auction were to fall below a certain price. Several types of delist bids exist:

- *Static delist bids* are submitted for a resource before the existing capacity qualification deadline, which occurs approximately eight months before an FCA. These delist bids are for resources opting to remove all or part of their total capacity from the market for a single commitment period at a price greater than or equal to \$1.00/kW-month. They may reflect either the cost of the resource or a reduction in ratings resulting from ambient air conditions.<sup>7</sup> The ISO may be required to submit a static delist bid on behalf of a resource if the resource, or combination of resources using an offer composed of separate resources, will not be able to supply its awarded

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<sup>4</sup> Changed from five to seven periods on May 30, 2014

<sup>5</sup> A *capacity supply obligation* is a requirement for a resource to provide capacity, or a portion of capacity, to satisfy a portion of the ISO's Installed Capacity Requirement acquired through an FCA, a reconfiguration auction, or a CSO bilateral contract through which a market participant may transfer all or part of its CSO to another entity.

<sup>6</sup> The methodology for qualifying existing capacity resources is contained in *Market Rule 1*, Section III.13, [http://www.iso-ne.com/regulatory/tariff/sect\\_3/mr1\\_sec\\_13-14.pdf](http://www.iso-ne.com/regulatory/tariff/sect_3/mr1_sec_13-14.pdf).

<sup>7</sup> "Ambient air" delist bids are those made to reflect a thermal generator's difference in capacity rating at 90 degrees Fahrenheit (°F) and at 100°F.

capacity during the entire commitment period. A lead participant may withdraw a static delist bid during a defined window, which occurs approximately four months before an FCA.

- *Dynamic delist bids* are submitted by participants during an auction. Unlike other types of delist bids, dynamic delist bids are only offered below \$1.00/kW-month, and the Internal Market Monitor does not oversee these bids (see below).
- *Permanent delist bids* represent a binding request to remove the resource's capacity from the capacity market permanently at a certain price. Capacity associated with a permanent delist bid may only reenter the capacity market if they qualify for, and clear, as a new resource in a subsequent FCA. Permanent delist bids are submitted for a resource before the existing capacity qualification deadline.
- *Nonprice retirement requests*, which are irrevocable requests to retire all or a portion of a resource, supersede any other delist bids submitted. Nonprice retirement requests are subject to a review for reliability impacts. If the ISO notifies a resource owner of a reliability need for the resource, the resource owner has the option to retire the resource as requested or continue to operate it until the reliability need has been met. Once the reliability need has been met, the resource must retire.
- *Export delist bids* are bids to exit the New England capacity market and sell capacity to a neighboring area. The cost of an export delist bid may include an opportunity-cost component of selling capacity to a neighboring market.
- *Administrative export delist bids* are submitted for capacity exports associated with multiyear contracts and are initiated using the same requirements as for export delist bids.

To provide market transparency to potential new capacity suppliers, all delist bids submitted during the qualification process are posted in advance of the FCA, with the exception of dynamic delist bids, which are submitted during the auction. The ISO reviews all delist bids for reliability purposes. Except for permanent delist bids and nonprice retirement requests, all delist bids are effective for the relevant commitment period only.

#### *Internal Market Monitor Oversight*

To address market power concerns, during the qualification process, the IMM reviews certain delist bids to determine whether bid prices are consistent with a resource's net risk-adjusted going-forward costs and opportunity costs as specified in the rules. All delist bids, except dynamic delist bids, must include sufficient documentation for the Internal Market Monitor to make these determinations; the Internal Market Monitor may reject delist bids that have insufficient supporting documentation for the delist price. Static delist bids, export delist bids, and permanent delist bids above \$1.00/kW-month are subject to Internal Market Monitor review. Delist bids submitted below \$1.00/kW-month are presumed to be competitive.

The IMM does not review ambient air delist bids or administrative export delist bids. The IMM also does not review dynamic delist bids submitted during the auction at prices below 1.00/kW-month.

No later than 127 days before the auction, the ISO must notify participants regarding whether their delist bids are qualified to participate in the FCA. All accepted delist bids are entered into the auction. For delist bids excluded from the auction as a result of the Internal Market Monitor's review, the ISO will explain in the notification correspondence the specific reasons for not accepting the bid and the Internal Market Monitor's derivation of an alternate delist price. The participant may opt to use this alternate price, subject to applicable market rules and by informing the Federal Energy Regulatory Commission (FERC).

No later than 7 days after the ISO notifies participants whether or not the Internal Market Monitor accepted their delist bids, participants with a static delist bid may elect to withdraw the bid entirely or submit revised prices for the resource's bid. The revised prices for the static delist bids must be equal to



or less than the highest price indicated in the initial bid, as approved by the Internal Market Monitor and greater than \$1.00/kW-month.

### **Qualification Process for New Capacity Resources**

Like existing resources, new supply-side and demand-side resources must undergo a qualification process to be able to participate in the FCM. Additionally, some resources previously counted as existing capacity (including deactivated or retired resources) and incremental capacity from existing resources may opt to be treated as new capacity resources in the FCA, subject to certain requirements.

To keep barriers to entry low and increase competition, the financial assurance required from new capacity suppliers is relatively low. A minimal level of credit enables more competitors to enter the market because they are not required to assume a relatively large financial guaranty during the project's development. However, because new commitments can be backed by a relatively low amount of financial security, they must undergo a rigorous qualification process and demonstrate that they can provide the capacity they plan to offer in the auction. This process ensures that any new project that clears in an auction can be interconnected before the delivery period and that the participant can back all capacity obligations with tangible assets to build the project.

#### *New Supply-Side Resources*

For new power plant proposals, the ISO conducts several studies to ensure that a generator can connect to the power grid electrically without having a negative impact on reliability or violating safety standards. The qualification review also assesses the project's feasibility (i.e., whether it realistically can be built and commercialized before the beginning of the relevant capability year). The ISO also must evaluate each new supply-side resource to ensure that it will be able to provide effective incremental capacity to the system. An overlapping impact analysis for each new supply-side resource assesses whether the resource can provide useful capacity and electric energy without negatively affecting the ability of other capacity resources to provide these services also.

The first step to qualify a new capacity resource is for project sponsors to submit a new capacity show-of-interest (SOI) form. The SOI form is a short application that requests a minimum amount of information (e.g., interconnection point, equipment configuration, megawatt capacity). The next step is for the project sponsors to submit a completed qualification package for the project by the new capacity qualification deadline (approximately 8 months before the FCA). This package must include all the data required for the ISO to evaluate the interconnection of the project and its feasibility. Also at this time, new import-capacity resources must provide documentation indicating the interface from which the capacity will be imported, the source of the capacity (from an external generating resource or from an adjacent balancing authority area), and the import's summer and winter capability ratings.

#### *New Demand-Side Resources*

Demand-reduction resource proposals undergo a feasibility review, during which the ISO ensures that the plans and methods for reducing electricity use meet industry standards. This is the primary mechanism for assessing demand-response project criteria because these projects have no interconnection impact.<sup>8</sup> For this review, demand resources submit a measurement and verification plan, which outlines the project and its development and how the resource will achieve the demand reduction. The ISO subsequently reviews this plan for completeness and to determine how much capacity the resource can provide.

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<sup>8</sup> *Demand response* is when a market participant reduces its consumption of electric energy from the network in exchange for compensation based on wholesale market prices.

### *Internal Market Monitor Oversight*

Per *Market Rule 1*, new resources are given a stated price, known as the offer-review trigger price (ORTP), up to which point the resource may remain within the auction. The IMM developed a menu of ORTPs for various resource types, which approximate the net cost of entry of each resource. The ORTP establishes a floor price for a new resource, below which it must leave the auction, absent a request submitted to the IMM to offer at a price lower than the relevant ORTP. New resources that might submit offers in the FCA at prices below the relevant ORTP must include in the new capacity qualification package the lowest price at which the resource requests to offer capacity, along with supporting documentation justifying that price as competitive in light of the resource's costs. If the IMM determines that the offer is consistent with the long-run average costs, the resource will be allowed to remain in the auction up to the validated price.

### *Notification and Filing*

No later than 127 days before each FCA, the ISO notifies each sponsor engaged in the qualification process regarding whether its new capacity resource has been accepted for participation in the FCA. If the project sponsor of a resource indicated an intention to offer capacity below its ORTP, the results of the Internal Market Monitor's assessment are also provided at this time. Additionally, the ISO files all qualification results and auction inputs with FERC. This informational filing is made approximately three months before the ISO conducts the auction and provides interested parties the opportunity to review and comment on the ISO's fulfillment of its responsibilities before conducting the FCA.

## **Auction Design**

Each Forward Capacity Auction is conducted in two stages; a descending-clock auction followed by an auction clearing process. The descending-clock auction, run by an auctioneer, consists of multiple rounds. Before the beginning of each round, the auctioneer announces to all participants the start-of-round and end-of-round prices. During the round, participants submit offers expressing their willingness to keep specific megawatt quantities in the auction at different price levels within the range of the start-of-round and end-of-round prices. During one of the rounds, the capacity willing to remain in the auction at some price level will equal or fall below the net Installed Capacity Requirement. FCM resources still in the auction at this point pass on to the auction-clearing stage.

Table 1 shows the hypothetical result of a descending-clock FCA with a starting price of \$15.00/kW-month. Additional assumptions built into this example are that the NICR equals 30,000 MW; 23,000 MW of existing capacity will be participating, thus 7,000 MW of new resources will be needed to meet the NICR; and 15,000 MW of new capacity will be participating.

**Table 1: Sample Results from a Descending-Clock Forward Capacity Auction Round**

Round Number	Start-of-Round Price (\$/kW-mo)	End-of-Round Price (\$/kW-mo)	End-of-Round Resource (MW)	Excess Capacity (MW)
1	\$15.00	\$9.50	38,000	8,000
2	\$9.49	\$9.00	32,500	2,500
3	\$8.99	\$8.00	32,000	2,000
4	\$7.99	\$7.50	31,000	1,000
5	\$7.49	\$7.00	30,750	750
6	\$6.99	\$6.00	29,800	-200

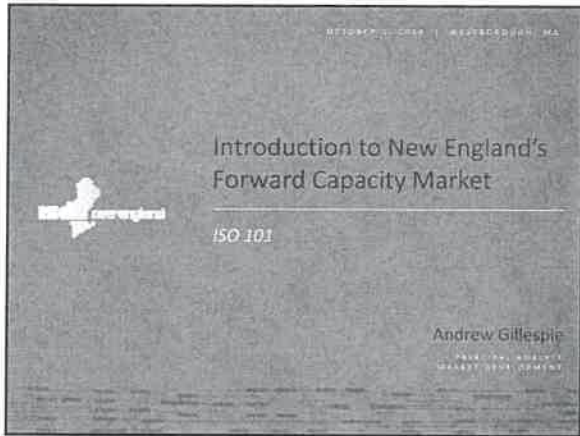
All the capacity resources remaining in the auction at the end of round six pass through to the second stage of the FCA. In this stage, the market-clearing auction software is run to determine the minimal capacity payment and to calculate final capacity-zone clearing prices. This step also includes a post-processing procedure that determines the final payment rate for each resource and its capacity supply obligation for the capacity commitment period. Thus, using the example shown in Table 1, after the sixth round, the market-clearing auction software would be run to determine the resources and the price that would minimize the cost at a purchase amount of 30,000 MW. The final capacity-zone clearing price in this example would equal some value between the round six start-of-round price and end-of-round price.

Reconfiguration auctions take place before and during the commitment period to allow participants to buy and sell capacity obligations and adjust their positions. These auctions are needed to add capacity to cover for potential increases in the ICR, to release capacity to match potential decreases in the ICR, and to defer capacity requirements associated with existing capacity delist bids. Annual reconfiguration auctions (ARAs) to acquire one-year commitments are held approximately two years, one year, and just before the FCA commitment period begins. Monthly reconfiguration auctions, held beginning the first month of the first commitment period, adjust the annual commitments during the commitment period.

## Capacity Payments

Resources with capacity supply obligations are paid the auction clearing price. However, two key provisions of the capacity payment structure are the *peak energy rent* (PER) adjustment and penalties incurred for unavailability during *shortage events*. The PER adjustment reduces capacity market payments for all capacity resources when prices in the electric energy markets go above the PER threshold (i.e., *strike*) price, which is an estimate of the cost of the most expensive resource on the system. This usually occurs when electricity demand is high. PER provides an additional incentive for capacity resources to be available during peak periods because capacity payments are reduced for all listed resources, even those not producing energy when the LMP exceeds the PER threshold price. PER also discourages physical and economic withholding in the energy market because a resource that withholds to raise price does not earn energy revenues, while its foregone revenues are deducted from the capacity market settlement.

*Shortage events* are periods when reserves fall below the system reserve requirements for 30 minutes or more. Shortage-event availability penalties are assessed for resources that have capacity supply obligations but are unavailable during defined shortage events. The availability penalties are a disincentive to withhold in the energy market.



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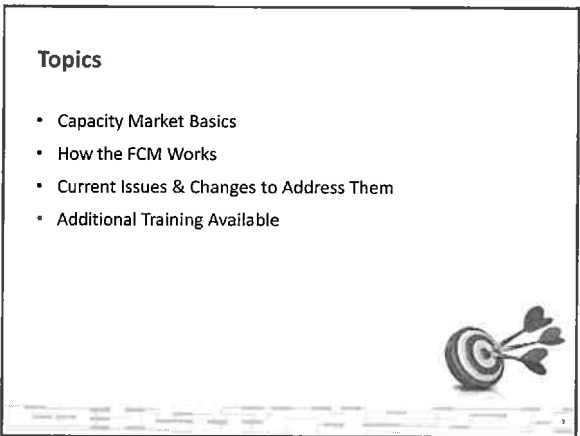
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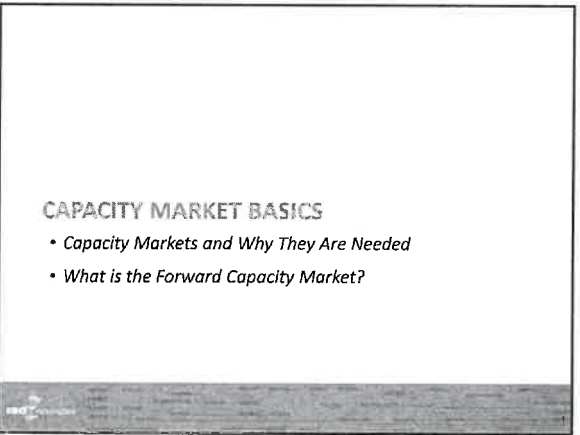
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## Capacity

### Capacity is, and is needed:

- To address specific system needs
- So special events on the system do not place the grid at risk
- Depends on where, when, and how it gets delivered

### NPCC's Definition of Capacity:

The rated continuous load-carrying ability, expressed in megawatts (MW) or megavolt-amperes (MVA) of generation, transmission, or other electrical equipment.  
*(Source: NPCC Glossary)*

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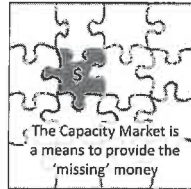
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## Why Have a Capacity Market?

- For some resources, infrequent dispatch provides limited opportunities to fully recover fixed costs
  - Energy prices may not be high enough for long enough
  - Expenditures not recovered in the energy and ancillary service markets is often called the 'missing' money
- This is not just a peaking resource problem
  - Base load generation can be very capital intensive - there may still be a missing money problem due to the size of the initial investment



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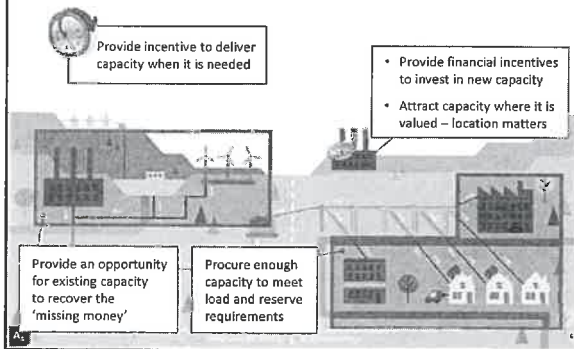
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## What Should a Capacity Market Do?



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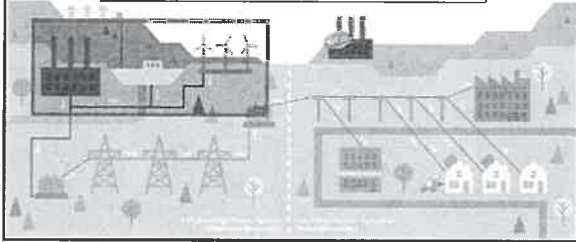
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### What Should a Capacity Resource Do?

In exchange, capacity resources must *at least*:

- Offer into the Energy Market
- Schedule maintenance with ISO



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### The Forward Capacity Market (FCM) is...

...a forward procurement, auction-based,  
Locational Capacity Market

Goal 1:

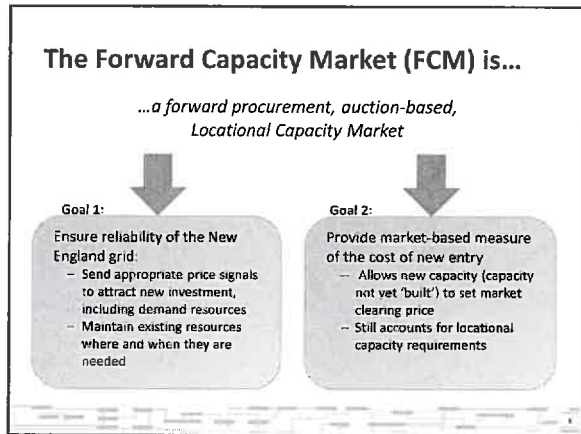
Ensure reliability of the New England grid:

- Send appropriate price signals to attract new investment, including demand resources
- Maintain existing resources where and when they are needed

Goal 2:

Provide market-based measure of the cost of new entry

- Allows new capacity (capacity not yet 'built') to set market clearing price
- Still accounts for locational capacity requirements



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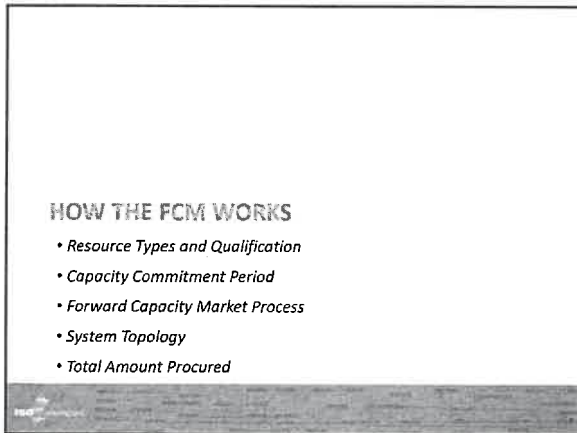
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### HOW THE FCM WORKS

- Resource Types and Qualification
- Capacity Commitment Period
- Forward Capacity Market Process
- System Topology
- Total Amount Procured



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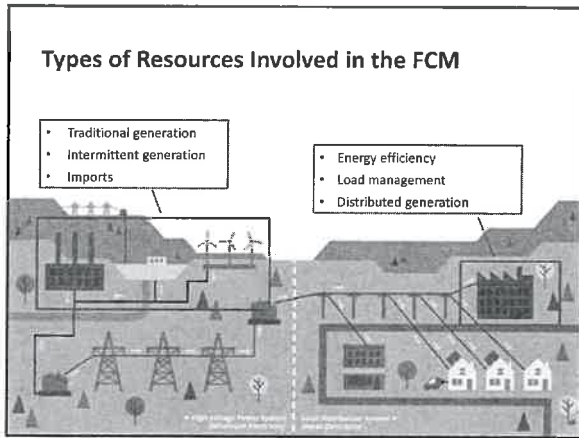
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### Resource Qualification

Resource Qualification

- FCA is designed to procure only those capacity resources that will be commercial and available at the beginning of each capability year
- FCA treats new and existing capacity resources differently

new

existing

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### New Capacity Resources

Resource Qualification

- Project sponsors must for *supply-side* resources:
  - Submit a Show of Interest (SOI) form
  - Submit a completed qualification package
  - Provide detailed documentation (import interface, source of capacity, summer/winter capability)
- Project sponsors must for *demand-side* resources:
  - Undergo a feasibility review
  - Outline how demand reduction will be achieved
- Financial Assurance is required
- New resources offer into market, but cannot submit an offer at a price that is below the resource's minimum offer price

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## Existing Capacity Resources



- ISO determines summer and winter qualified capacity for each resource
- Existing resources are automatically entered into the capacity auction based on their qualified capacity
- To opt out of the capacity market, existing resources can submit a de-list bid
  - Can be for one year or permanently
  - Internal Market Monitor provides oversight of most de-list bid types
  - System Planning will review reliability impact




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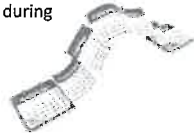
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## Capacity Commitment Period (CCP)

- The CCP is a 12 month period, including one Summer period (June – September) and one Winter period (October – May)
  - not a calendar year
- Capacity resources must offer into the energy market and schedule maintenance with the ISO
- *Currently*, if the resource is available during a scarcity, the resource is deemed delivering its 'capacity'




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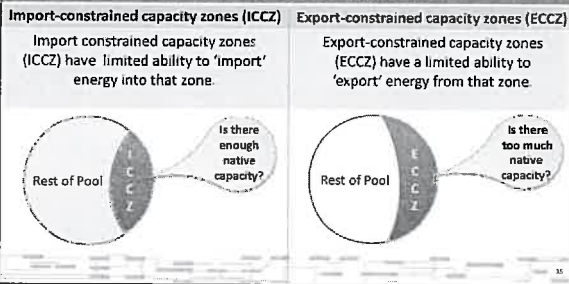
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## System Topology

Each year the ISO reviews with stakeholders what zones will be used in the FCA




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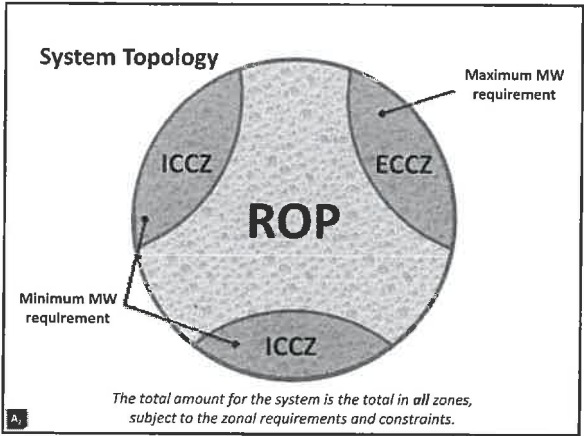
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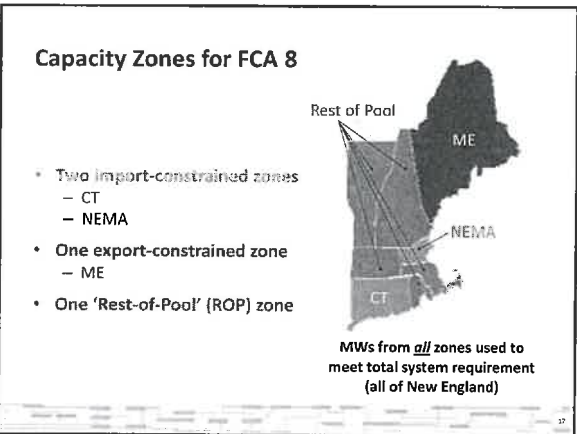
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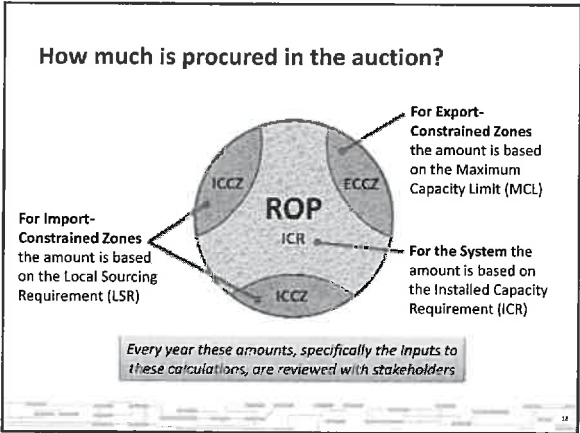
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## What is Installed Capacity Requirement (ICR)?

- ICR is the amount of capacity needed such that the probability of disconnecting non-interruptible customers due to resource deficiency is no more than once in ten years
- Some of the factors considered in determining the ICR amount are:
  - Weather variations on load forecasts
  - Resource equivalent forced outage rates
  - Reliability benefits from interconnections with adjacent control areas




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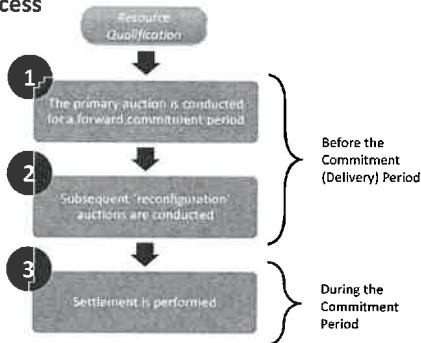
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## FCM Process




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## The Forward Capacity Auction (FCA)

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- The FCA is conducted approximately 3 years before the commitment period
- Resources must qualify to participate, which ensures resources are 'real'
  - This process however, requires that qualification start approximately 4 years before the commitment period
- The FCA uses a descending clock auction format
  - Given the stakes involved this format provides for more informed bidding, and hence more efficient pricing outcomes

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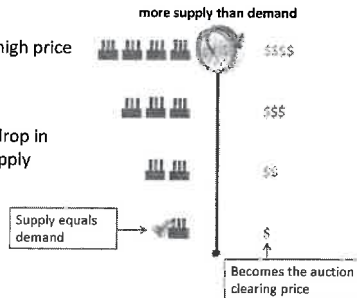
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## Concept of a Descending Clock Auction

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- Auction starts at a high price
- Price is lowered in increments
- Price continues to drop in increments until supply meets demand
- Auction stops



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## Annual Reconfiguration Auction (ARA)

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- Three ARAs are conducted between the FCA and the commitment period
- Provides opportunity for:
  - Suppliers to swap obligations
  - ISO to adjust total purchased amount

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## CURRENT ISSUES & THE CHANGES TO ADDRESS THEM

- *Brief History of the FCM (How did we get here?)*
- *Price Volatility*
- *Resource Performance*

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## Brief History of the FCM

2004	Locational Capacity Market
2004-2006	Settlement Agreement discussions
2006-2011	Establishment of FCM using SA framework
2011-present day	Creation and utilization of a sloped demand curve to dampen price volatility Modification of market structure to create incentives to achieve desired outcomes

### Current Issues:

Price Volatility

Resource Performance

## Too Much Price Volatility

Price Volatility  
The Issue

### Bad for suppliers

- Difficult to finance a project with very variable expected future revenues

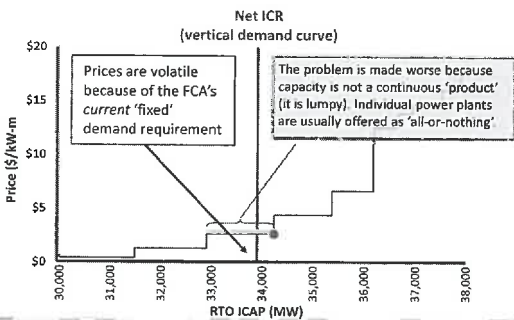
### Bad for buyers/demand/load

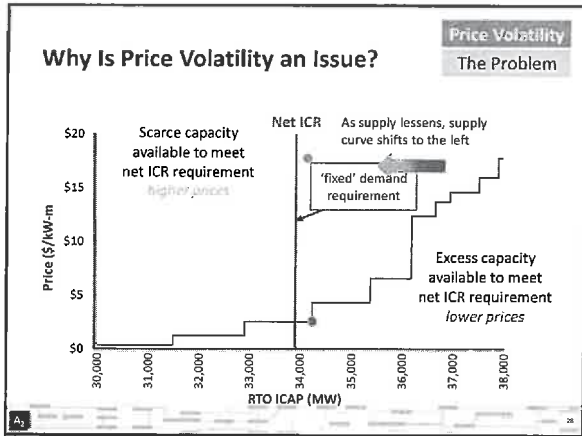
- Price shocks are difficult to hedge, and difficult to explain to consumers

*Price volatility is not, by itself, a bad thing. Some volatility in the markets is needed.*

## Price Volatility

Price Volatility  
The Problem






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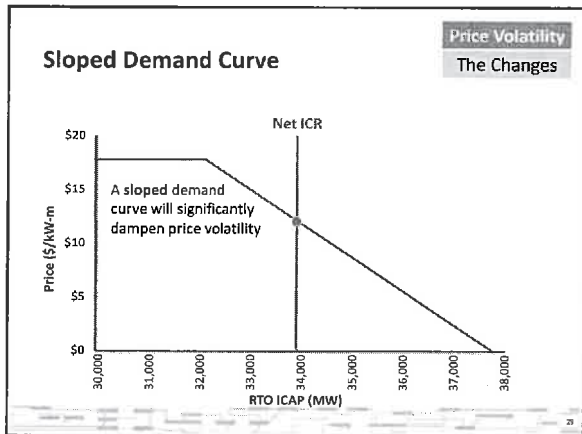
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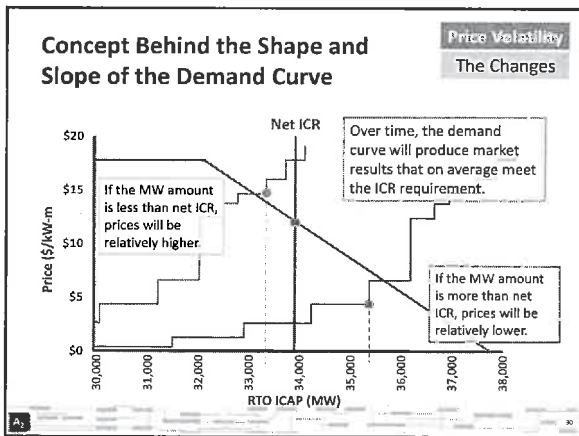
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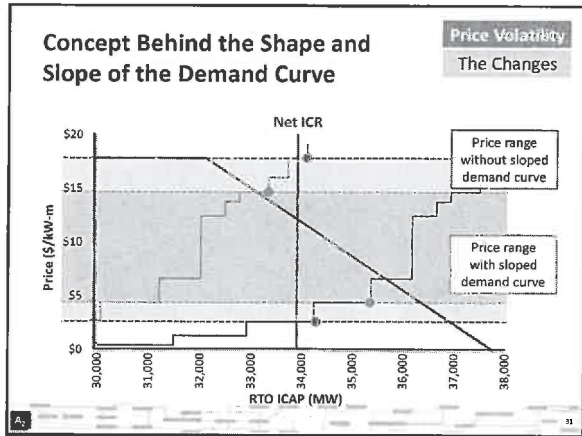
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### Resource Performance

Resource Performance  
The Issue

- Capacity resources are used day-to-day but are really needed when the system is stressed
  - high loads
  - contingencies
- When the system is stressed, the ISO cannot meet both the load and the reserve requirement with the resources at hand
  - When the reserve requirement is not being met, the reserve price is at a maximum (at the Reserve Constraint Penalty Factor price)

*Paying a resource to 'be there' has not been sufficient incentive for a resource to make a meaningful contribution when 'capacity' is really needed.*

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### Why Is Performance an Issue?

Resource Performance  
The Problem

- Current metric of 'availability' does not incent sufficient performance when the system is deficient
  - July 19, 2013 – There were no reductions in payments for the capacity that was out or reduced

Net Capability Required	29,751 MW
Capacity Margin	(\$67) /MW
Outages & Reductions	4,611 MW

- Availability (or lack of) is not a meaningful component in a resource's offer price
  - 'Performance' is undervalued in the supply stack of offers

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### New Performance Metric

Resource  
Performance  
The Changes

- Metric will be the delivered energy and/or reserves during periods of system stress
  - This is a two-settlement construct
- Offers to sell capacity will now reflect, in addition to a resource's going forward costs (i.e., avoided costs) the resource's expected performance during scarcity conditions
- During the commitment period
  - A resource will get a base payment
    - Paid by load
  - A resource will be subject to a delivery settlement
    - Transfer between suppliers

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### Benefits of the Two-Settlement Design

Resource  
Performance  
The Changes

- Greater operational- related investments at existing resources to improve resource performance
  - For example, dual-fuel arrangements
- Efficient resource evolution – those that deliver will get rewarded
- A more reliable system at lowest possible cost

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### Topics Covered

- Capacity Market Basics
- How the FCM Works
- Current Issues & Changes to Address Them
- Additional Training Available



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## Summary

The Forward Capacity Market is designed to:

- Procure enough capacity to meet load and reserve requirements
- Attract capacity where it is needed (location matters)
- Helps with the 'missing money' problem by:
  - Providing an opportunity for existing capacity to recover costs
  - Providing a financial incentive to invest in new capacity when needed

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## Additional Training Available

- 2014 Instructor Led Training  
(class materials available at [iso-ne.com/participate/training/materials](http://iso-ne.com/participate/training/materials))
  - WEM 101 (4.5 day class)
    - Course schedule for 2015 to be announced
  - FCM 101 (4 day class)
    - October 20-23, 2014 in Northampton, MA
- 2014 Webinars  
(recordings available at [iso-ne.com/participate/training/elearning-opportunities](http://iso-ne.com/participate/training/elearning-opportunities))
  - Demand Resources Show of Interest for the Ninth Forward Capacity Auction 2018-19 (1/22/2014)
  - New Generation & Imports Show of Interest for the Ninth Forward Capacity Auction 2018-19 (1/23/2014)
  - Existing Capacity Qualification (4/3/2014)
  - New Capacity Qualification – Demand Resources (5/7/2014)
  - New Capacity Qualification – Supply Resources (5/8/2014)
  - FCM Reconfiguration Auction (9/5/2014)
- Web-Based Training Modules
  - Financial Assurance for the Forward Capacity Market (1/2014)

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# **EXHIBIT**

## **B**

**III.13. Forward Capacity Market.**

The ISO shall administer a forward market for capacity ("Forward Capacity Market") in accordance with the provisions of this Section III.13. For each one-year period from June 1 through May 31, starting with the period June 1, 2010 to May 31, 2011, for which Capacity Supply Obligations are assumed and payments are made in the Forward Capacity Market ("Capacity Commitment Period"), the ISO shall conduct a descending clock auction ("Forward Capacity Auction") in accordance with the provisions of Section III.13.2 to procure the amount of capacity needed in the New England Control Area and in each modeled Capacity Zone during the Capacity Commitment Period, as determined in accordance with the provisions of Section III.12. To be eligible to assume a Capacity Supply Obligation for a Capacity Commitment Period through the Forward Capacity Auction, a resource must be accepted in the Forward Capacity Auction qualification process in accordance with the provisions of Section III.13.1. A Capacity Supply Obligation is an obligation to provide capacity from a resource, or a portion thereof, that is acquired through a Forward Capacity Auction in accordance with Section III.13.2, a reconfiguration auction in accordance with Section III.13.4, or a Capacity Supply Obligation Bilateral in accordance with Section III.13.5.

# **EXHIBIT**

**C**

### **III.13.6. Rights and Obligations.**

Resources assuming a Capacity Supply Obligation through a Forward Capacity Auction or resources assuming or shedding a Capacity Supply Obligation through a reconfiguration auction or a Capacity Supply Obligation Bilateral shall comply with this Section III.13.6 for each Capacity Commitment Period. In the event a resource with a Capacity Supply Obligation assumed through a Forward Capacity Auction, reconfiguration auction, or Capacity Supply Obligation Bilateral can not be allowed to shed its Capacity Supply Obligation due to system reliability considerations, the resource shall maintain the Capacity Supply Obligation until the resource can be released from its Capacity Supply Obligation. No additional compensation shall be provided through the Forward Capacity Market if the resource fails to be released from its Capacity Supply Obligation.

#### **III.13.6.1. Resources with Capacity Supply Obligations.**

A resource with a Capacity Supply Obligation assumed through a Forward Capacity Auction, reconfiguration auction, or a Capacity Supply Obligation Bilateral shall comply with the requirements of this Section III.13.6.1 during the Capacity Commitment Period, or portion thereof, in which the Capacity Supply Obligation applies.

##### **III.13.6.1.1. Generating Capacity Resources.**

###### **III.13.6.1.1.1. Energy Market Offer Requirements.**

A Generating Capacity Resource having a Capacity Supply Obligation shall be offered into both the Day-Ahead Energy Market and Real-Time Energy Market at a MW amount equal to or greater than its Capacity Supply Obligation whenever the resource is physically available. If the resource is physically available at a level less than its Capacity Supply Obligation, however, the resource shall be offered into both the Day-Ahead Energy Market and Real-Time Energy Market at that level. Day-Ahead Energy Market Supply Offers from such Generating Capacity Resources shall also meet one of the following requirements:

- (a) the sum of the Generating Capacity Resource's Notification Time plus Start-Up Time plus Minimum Run Time plus Minimum Down Time is less than or equal to 72 hours; or
- (b) if the Generating Capacity Resource cannot meet the offer requirements in Section III.13.6.1.1.1(a) due to physical design limits, then the resource shall be offered into the Day-Ahead

Energy Market at a MW amount equal to or greater than its Economic Minimum Limit at a price of zero or shall be self-scheduled in the Day-Ahead Energy Market at a MW amount equal to or greater than the resource's Economic Minimum Limit.

**III.13.6.1.1.2. Requirement that Offers Reflect Accurate Generating Capacity Resource Operating Characteristics.**

For each day, Day-Ahead Energy Market and Real-Time Energy Market offers for the listed portion of a resource must reflect the then-known unit-specific operating characteristics (taking into account, among other things, the physical design characteristics of the unit) consistent with Good Utility Practice.

Resources must re-declare to the ISO any changes to the offer parameters that occur in real time to reflect the known capability of the resource. A resource failing to comply with this requirement shall be subject to economic penalties described in Appendix B, in addition to any applicable availability penalties pursuant to Section III.13.7.2.7.1.2.

**III.13.6.1.1.3. [Reserved.]**

**III.13.6.1.1.4. [Reserved.]**

**III.13.6.1.1.5. Additional Requirements for Generating Capacity Resources.**

Generating Capacity Resources having a Capacity Supply Obligation are subject to the following additional requirements:

- (a) auditing and rating requirements as detailed in the ISO New England Manuals and ISO New England Operating Procedures;
- (b) Operating Data collection requirements as detailed in the ISO New England Manuals and Market Rule 1 and the requirement to provide to the ISO, upon request and as soon as practicable, confirmation of gas volume schedules sufficient to deliver the energy scheduled for each Generating Capacity Resource using natural gas;
- (c) outage requirements in accordance with the ISO New England Manuals and ISO New England Operating Procedures, provided, however, that the portion of a resource having no Capacity Supply

# **EXHIBIT**

## **D**

## FOR IMMEDIATE RELEASE

**Contact:**

Ellen Foley (413) 535-4139  
Marcia Blomberg (413) 540-4555  
Jeffrey Jurgensmier (413) 540-4483

## ISO-NE Capacity Auction Secures Sufficient Power System Resources, At a Lower Price, for Grid Reliability in 2019-2020

*2016 auction clearing price is 25% lower than last year's auction*

**Holyoke, MA—February 11, 2016**—New England's annual capacity auction concluded Monday with sufficient resources to meet demand in 2019-2020, at a lower price, and with more than 1,400 megawatts (MW) of new generating capacity that will help replace recently retired and retiring generators. The auction is run by ISO New England Inc. to procure the resources that will be needed to meet projected demand three years in the future.

The tenth Forward Capacity Market (FCM) auction (FCA #10) attracted significant competition among resources to provide reliability services in New England. Before the auction, a total of 40,131 MW of resources, including 6,700 MW of new resources, qualified to compete in the auction to provide the 34,151 MW Installed Capacity Requirement (ICR) for 2019-2020.

"Competition was robust in this year's Forward Capacity Auction," said Gordon van Welie, president and CEO of ISO New England. "The high participation in the auction demonstrates the interest in the New England marketplace and bodes well for meeting future resource adequacy requirements."

Recent and pending retirements of coal, oil, and nuclear power plants expected to shut down by 2019 total more than 4,200 MW, including the 680 MW Pilgrim Nuclear Power Station that announced its retirement before this auction.

"Developers were drawn to the New England marketplace because the price of capacity supports construction of new resources," continued van Welie. "It's important to have a capacity market that places an appropriate value on the product to maintain an adequate supply. This auction procured the resources needed to keep the lights on in New England at a price lower than last year's auction and, in fact, lower than the estimated cost of building a new power plant. More than 850 megawatts of new generating capacity cleared in the Greater Boston, Southeast Massachusetts and Rhode Island zone where the resources are needed most."

**Preliminary results of FCA #10:**

- About 35,567 MW of capacity cleared the auction to meet the 34,151 MW ICR for 2019-2020. (The region can acquire more or less than the specific capacity requirement, depending on reliability standards and price.)
  - 31,371 MW of generation, including 1,459 MW of new generation
  - 2,746 MW of demand-side resources, including 371 MW that is new
  - 1,450 MW of imports from New York and Canada

**Preliminary clearing price:**

- The auction closed for resources within New England after four rounds of competitive bidding at \$7.03/kW-month, at the point on the demand curve where there were still sufficient resources to meet demand. The clearing price will be paid to all resources in both capacity zones in the region. *[Clarification]* Imports from Quebec over Phase II and Highgate also cleared at \$7.03/kW-month.
- The clearing price was more than 25% lower than last year's \$9.55/kW-month for most resources. The lower clearing price demonstrates strong competition among resources and also illustrates that the capacity market is continuing to work: higher prices resulting from resource shortfalls in earlier auctions provided the incentives for developers to bring new—and needed—resources to the market.

- At \$7.03/kW-month, the total value of the capacity market in 2019-2020 will be approximately \$3 billion, compared to the estimated \$4 billion for 2018-2019.
  - The price of \$7.03/kW-month is less than the pre-auction estimate of the cost of building a new natural-gas-fired power plant in New England, at \$10.81/kW-month
- The auction continued for a fifth round for 181 MW of New Brunswick imports, which will receive \$4.00/kW-month. New York imports totaling 1,044 MW, which cleared in the fourth round, will receive a price of \$6.26/kW-month.

#### Highlights of FCA #10:

- **Three large, new, dual-fuel power plants totaling 1,302 MW** cleared the auction. The proposed plants are all near the region's largest population centers, and two are in the former Southeast Massachusetts/Rhode Island zone, where a capacity shortfall materialized before last year's auction for 2018-2019. All three will burn natural gas as their primary fuel, with oil as their secondary fuel:
  - About 485 MW of the Burrillville Energy Center 3 in Burrillville, Rhode Island
  - 484 MW at Bridgeport Harbor 6 in Bridgeport, Connecticut
  - 333 MW at Canal 3 in Sandwich, Massachusetts
- **27 megawatts of new wind and 44 megawatts of new solar** cleared the auction; in all, 135 MW of wind and 65 MW of solar facilities cleared FCA #10

#### Several firsts, including:

- 6.8 MW from the first offshore wind farm under construction in the US cleared the auction: Deepwater Wind's 34-MW facility off Block Island, RI
- With the development of the first, multi-state, long-term forecast of solar growth in the nation, small-scale solar facilities around New England were incorporated into the calculation of how much capacity will be required. Forecasted demand reductions from solar reduced the ICR in 2019-2020 by 390 MW.
- Two large fuel cell facilities, providing 2.5 MW each, cleared the auction.

For FCA #10, the region was divided into two zones: Rest of Pool (ROP) which includes Connecticut, western and central Massachusetts, Vermont, New Hampshire, and Maine; and Southeastern New England (SENE), which includes Northeast Massachusetts/Greater Boston and Southeast Massachusetts/Rhode Island. The SENE zone was created based on transmission limitations that restrict the level of power that can be imported into the area, as well as local resource levels and needs. The clearing price in FCA #10 applies to resources in both zones.

#### Market design changes now in effect

Several significant FCM enhancements went into effect with last year's auction, including Pay for Performance incentives. The market redesign work by ISO New England, market participants, policymakers and regulators, and others, is helping remove risks from the market and providing developers with the financial stability needed to invest in new resources. The enhancements also provide consumers with greater assurance that the region's power system will have sufficient capacity to keep the lights on, and that those resources will perform when called on. These market changes, as well as other steps taken by the ISO, helped incentivize the 1,302 MW of new, dual-fuel power plants that cleared FCA #10. These dual-fuel generators will enhance reliability because if one fuel is unavailable, they can turn to the second fuel.

#### Forward Capacity Market auction basics

The annual FCM auction is held three years before each capacity commitment period to provide time for new resources to be developed. Capacity resources can include traditional power generation, renewable generation, or



demand-side resources such as load management and energy-efficiency measures. Resources that clear in the auction will receive a monthly capacity payment in that future year in exchange for their commitment to provide power or curtail demand when called upon by the ISO. The capacity market is separate from the energy market, where resources compete on a daily basis to provide power, and are paid for the electricity they produce.

#### **Next Steps**

Finalized auction results will be included in a filing with the Federal Energy Regulatory Commission within the month. The finalized results filing will include resource-specific information.

### **ABOUT ISO NEW ENGLAND**

Created in 1997, ISO New England is the independent, not-for-profit corporation responsible for the reliable operation of New England's electric power generation and transmission system, overseeing and ensuring the fair administration of the region's wholesale electricity markets, and managing comprehensive regional electric power planning.



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# **EXHIBIT**

**E**



February 29, 2016

**VIA ELECTRONIC FILING**

The Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: ISO New England Inc., Docket No. ER16-\_\_\_-000**  
**Forward Capacity Auction Results Filing**  
**April 14, 2016 COMMENT DATE REQUIRED BY REGULATION**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”)<sup>1</sup> and Section III.13.8.2 of the ISO New England Transmission, Markets and Services Tariff (the “Tariff”),<sup>2</sup> ISO New England Inc. (the “ISO”) submits this Forward Capacity Auction Results Filing (“FCA Results Filing”) for the tenth Forward Capacity Auction (“FCA”).<sup>3</sup> Section III.13.8.2 (a) of the Tariff requires the ISO to file the results of the FCA with the Federal Energy Regulatory Commission (“Commission” or “FERC”) as soon as practicable after the FCA is complete. The tenth FCA was held on February 8, 2016 for the June 1, 2019 through May 31, 2020 Capacity Commitment Period. The ISO submits this filing in accordance with the Tariff.

Pursuant to Section III.13.8.2 (c) of the Tariff, any objection to the FCA results must be filed with the Commission within 45 days from the date of the FCA Results Filing. **Accordingly, any objections must be filed on or before April 14, 2016, and the ISO requests that the Commission issue a notice setting an April 14, 2016 comment date.** As discussed below, the ISO requests an effective date of June 28, 2016, which is 120 days from the date of this submission.

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<sup>1</sup> 16 U.S.C. § 824d (2006).

<sup>2</sup> The rules governing the Forward Capacity Market (“FCM Rules”) are primarily contained in Section III.13 of the Tariff, but also may include other provisions, including portions of Section III.12.

<sup>3</sup> Capitalized terms used but not otherwise defined in this filing have the meanings ascribed thereto in the Tariff, the Second Restated New England Power Pool Agreement and the Participants Agreement.

In accordance with Section III.13.8.2 of the Tariff, this submission contains the results of the tenth FCA, including the Capacity Zones in the auction; the Capacity Clearing Price in each of those Capacity Zones; a list of which resources received Capacity Supply Obligations in each Capacity Zone; and the amount of those Capacity Supply Obligations. Pursuant to Tariff Section III.12.4, the Capacity Zones for the tenth FCA were the Southeastern New England (“SENE”) Capacity Zone and the Rest-of-Pool Capacity Zone. The SENE Capacity Zone is a combination of the Northeastern Massachusetts/Boston, Southeastern Massachusetts, and Rhode Island Load Zones. The Rest-of-Pool Capacity Zone includes the Connecticut, Maine, Western/Central Massachusetts, New Hampshire, and Vermont Load Zones.

The auction commenced with a starting price of \$17.296/kW-month and concluded for the SENE and Rest-of-Pool Capacity Zones after four rounds. Resources in those Capacity Zones will be paid at the Capacity Clearing Price set pursuant to the system-wide sloped demand curve, which was \$7.030/kW-month.<sup>4</sup> Imports over the Phase I/II HQ Excess external interface, totaling 166 MW, and imports over the Hydro-Quebec Highgate external interface, totaling 58 MW, will receive \$7.030/kW-month. Imports over the New York AC Ties external interface, totaling 1,044.8 MW, will receive \$6.260/kW-month. Imports over the New Brunswick external interface, totaling 181 MW, will receive \$4.00/kW-month.

Section III.13.8.2 (b) of the Tariff requires the ISO to provide documentation regarding the competitiveness of the FCA. The documentation may include certification from the auctioneer and the ISO that: (i) all resources offering and bidding in the FCA were properly qualified in accordance with the provisions of Section III.13.1; and (ii) the FCA was conducted in accordance with the provisions of Section III.13. Pursuant to Section III.13.8.2 (b), the ISO has included the Testimony of Stephen J. Rourke, Vice President of System Planning at the ISO (“Rourke Testimony”), the Testimony of Robert G. Ethier, Vice President of Market Operations at the ISO (“Ethier Testimony”), the Testimony of Jeffery McDonald, Vice President of Market Monitoring and the Internal Market Monitor (“IMM”) at the ISO (“McDonald Testimony”), and the Testimony of Lawrence M. Ausubel, the auctioneer (“Ausubel Testimony”).

The ISO tenders the instant filing in compliance with Section III.13.8.2 of its Tariff pursuant to Section 205 of the FPA, and the ISO requests that the Commission find that the ISO conducted the tenth FCA in accordance with its FERC-approved Tariff.

## **I. COMMUNICATIONS**

All correspondence and communications in this proceeding should be addressed to the undersigned as follows:

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<sup>4</sup> Existing resources with multi-year obligations from previous auctions will be paid based on the Capacity Clearing Price in the auction in which they originally cleared. Self-supplied resources will not be paid through the FCM.

The Honorable Kimberly D. Bose, Secretary  
February 29, 2016  
Page 3 of 7

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## **II. STANDARD OF REVIEW**

The ISO tenders the instant filing in compliance with Section III.13.8.2 of its Tariff and pursuant to Section 205 of the FPA.<sup>5</sup> The ISO respectfully requests that the Commission find that the tenth FCA Results Filing meets the standard of Section 205, in that the results are just and reasonable rates derived from the auction that was conducted in accordance with the ISO's FERC-approved Tariff. The attached testimonies support this conclusion, and provide the basis for the Commission to approve the resulting rates.

## **III. REQUESTED EFFECTIVE DATE**

The ISO respectfully requests that the Commission accept the tenth FCA Results Filing, confirming that the auction was conducted in conformance with the ISO's Commission-approved Tariff, to be effective June 28, 2016 which is 120 days after the date of submission. Under the Tariff, parties have 45 days to file with the Commission an objection to the FCA Results Filing. An effective date of 120 days from the date of submission gives interested parties an opportunity to respond to any objections and provides the Commission time to review the FCA Results Filing and associated pleadings.

## **IV. SPECIFIC FCA RESULTS**

### **A. Capacity Zones Resulting From the Auction**

Section III.13.8.2 (a) of the Tariff requires the ISO to provide the Capacity Zones resulting from the FCA. The Capacity Zones for the tenth FCA were SENE and Rest-of-Pool. The Capacity Zones determined under Section III.13.2.3.4 of the Tariff are the same Capacity Zones that were modeled pursuant to Section III.12.4 of the Tariff.

### **B. Capacity Clearing Price**

The Tariff requires the ISO to provide the Capacity Clearing Price in each Capacity Zone (and, pursuant to Section III.13.2.3.3 (d), the Capacity Clearing Price associated with certain imports, if applicable).<sup>6</sup>

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<sup>5</sup> It should be noted that the Commission has consistently held that the matters properly in dispute in the annual FCA results filing are the results of the FCA and not the underlying market design or rules. *See e.g., ISO New England Inc.*, 130 FERC ¶ 61,145 at P 33 (2010) (finding that challenges to the FCM market design are outside the scope of the proceeding evaluating the FCA results filing).

<sup>6</sup> Tariff Section III.13.8.2 (a).

For the tenth FCA, the descending clock auction starting price in each Capacity Zone was \$17.296/kW-month. As explained in the Ethier Testimony, the auction resulted in the same Capacity Clearing Price of \$7.030/kW-month for the Rest-of-Pool and SENE Capacity Zones.<sup>7</sup>

Imports over the Phase I/II HQ Excess external interface, totaling 166 MW, and imports over the Hydro-Quebec Highgate external interface, totaling 58 MW, will receive a Capacity Clearing Price of \$7.030/kW-month. Imports over the New York AC Ties external interface, totaling 1,044.8 MW, will receive a Capacity Clearing Price of \$6.260/kW-month. Imports over the New Brunswick external interface, totaling 181 MW, will receive a Capacity Clearing Price of \$4.00/kW-month.<sup>8</sup>

### **C. Capacity Supply Obligations**

The Tariff requires the ISO to specify in the FCA Results Filing the resources which received Capacity Supply Obligations in each Capacity Zone.<sup>9</sup> This information is provided in Attachment A.

The Tariff also requires the ISO to list which resources cleared as Conditional Qualified New Generating Capacity Resources and to provide certain information relating to Long Lead Time Generating Facilities.<sup>10</sup> No resources cleared as Conditional Qualified New Generating Capacity Resources in the tenth FCA. In addition, there were no Long Lead Time Generating Facilities that secured a Queue Position to participate as a New Generating Capacity Resource in the tenth FCA; and as such, there were no resources with a lower queue priority that were selected in the FCA subject to a Long Lead Time Generating Facility with a higher queue priority.

### **D. De-List Bids Reviewed For Reliability Purposes**

The Tariff requires the FCA Results Filing to enumerate any de-list bids rejected for reliability reasons.<sup>11</sup> No de-list bids were rejected for reliability reasons in the tenth FCA.<sup>12</sup>

## **V. DOCUMENTATION OF COMPETITIVENESS**

Section III.13.8.2 (b) of the Tariff requires the ISO to provide documentation regarding the competitiveness of the FCA. The documentation may include certification from the auctioneer and the ISO that: (i) all resources offering and bidding in the FCA were properly qualified in accordance with the provisions of Section III.13.1 of the Tariff; and (ii) the FCA was conducted in accordance with the provisions of Section III.13 of the Tariff. In this regard, the ISO has included the Rourke Testimony, the Ethier Testimony, the McDonald Testimony, and the Ausubel Testimony.

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<sup>7</sup> Ethier Testimony at 5.

<sup>8</sup> *Id.* at 11-12.

<sup>9</sup> Tariff Section III.13.8.2 (a).

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> Rourke Testimony at 5.

In his testimony, Mr. Rourke, who oversaw the qualification of resources, certifies that all resources offering and bidding in the tenth FCA were qualified in accordance with Section III.13.1 of the Tariff.<sup>13</sup> Mr. Rourke testifies that he oversaw the reliability review of all submitted de-list bids for the tenth FCA and that no resources that submitted de-list bids were retained for reliability reasons.<sup>14</sup>

In his testimony, Dr. Ethier explains the prices resulting from the auction and how the prices were determined.<sup>15</sup> Dr. Ethier also explains the prices over the external interfaces and why those prices were lower than for resources located in New England.<sup>16</sup>

Dr. McDonald explains that the IMM reviewed de-list bids from existing resources and offers from new resources submitted during the qualification process.<sup>17</sup> Dr. McDonald testifies that he oversaw the IMM's review of these bids and offers and certifies that such review was performed in accordance with the provisions of Section III.13.1.<sup>18</sup> Dr. McDonald also notes that the IMM's determinations with respect to the offers and bids were accepted by the Commission in the Informational Filing Order.<sup>19</sup>

Dr. Ausubel, the auctioneer, and chairman and founder of Power Auctions LLC, the company that helped implement and administer the FCA, certifies that the auction was conducted in accordance with Section III.13.2.<sup>20</sup> Dr. Ausubel's certification is based on his vast experience in conducting energy auctions.

## VI. ADDITIONAL SUPPORTING INFORMATION

The ISO tenders the instant filing in compliance with Section III.13.8.2 of its Tariff pursuant to Section 205 of the FPA.<sup>21</sup> Section 35.13 of the Commission's regulations generally requires public utilities to file certain cost and other information related to an examination of cost-of-service rates.<sup>22</sup> However, the results of the FCA are not traditional "rates" and the ISO is not a traditional investor-owned utility. Therefore, to the extent necessary, the ISO requests waiver of Section 35.13 of the Commission's regulations. Notwithstanding its request for waiver, the ISO submits the following additional information in compliance with the identified filing regulations of the Commission applicable to Section 205.

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<sup>13</sup> *Id.* at 3.

<sup>14</sup> *Id.* at 3-5.

<sup>15</sup> Ethier Testimony at 3-5.

<sup>16</sup> *Id.* at 11-12.

<sup>17</sup> McDonald Testimony at 2-3.

<sup>18</sup> *Id.*

<sup>19</sup> *Order Accepting Informational Filing*, 154 FERC ¶ 61,041 (2016); *see also* McDonald Testimony at 3.

<sup>20</sup> Ausubel Testimony at 4.

<sup>21</sup> As was noted above, the Commission has consistently held that the scope of the proceeding evaluating the annual FCA results filing is limited to the results of the FCA. *See e.g., ISO New England Inc.*, 130 FERC ¶ 61,145 at P 33 (2010) (finding that challenges to the FCM market design are outside the scope of the proceeding evaluating the FCA results filing).

<sup>22</sup> 18 C.F.R. § 35.13 (2015).

35.13(b)(1) - Materials included herewith are as follows:

- a. This transmittal letter;
- b. Attachment A: List of Capacity Supply Obligations;
- c. Attachment B: Testimony of Stephen J. Rourke;
- d. Attachment C: Testimony of Robert G. Ethier
- e. Attachment D: Testimony of Jeffrey McDonald;
- f. Attachment E: Testimony of Lawrence M. Ausubel; and
- g. Attachment F: List of governors and utility regulatory agencies in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont to which a copy of this filing has been emailed.

35.13(b)(2) - The ISO respectfully requests that the Commission accept this filing to become effective on June 28, 2016, which is 120 days after the submission of this FCA Results Filing.

35.13(b)(3) - Pursuant to Section 17.11 (e) of the Participants Agreement, Governance Participants are being served electronically rather than by paper copy. The names and addresses of the Governance Participants are posted on the ISO's website at <http://www.iso-ne.com/participate/participant-asset-listings/directory?id=1&type=committee> . An electronic copy of this transmittal letter and the accompanying materials has also been emailed to the governors and electric utility regulatory agencies for the six New England states which comprise the New England Control Area, and to the New England Conference of Public Utility Commissioners, Inc. The names and addresses of these governors and regulatory agencies are shown in Attachment F.

35.13(b)(4) - A description of the materials submitted pursuant to this filing is contained in the transmittal letter;

35.13(b)(5) - The reasons for this filing are discussed in the background section to this transmittal letter; and

35.13 (b)(7) - The ISO has no knowledge of any relevant expenses or cost of service that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

## **VII. CONCLUSION**

In this FCA Results Filing, the ISO has presented all of the information required by the Tariff. The ISO has demonstrated that the tenth FCA was conducted in accordance with the Tariff, as found just and reasonable by the Commission. The ISO has specified the Capacity Zones that were used in the auction. The ISO has also provided the Capacity Clearing Price for each of the Capacity Zones and a list of resources that received Capacity Supply Obligations. Finally, the ISO has provided documentation in the form of testimony, regarding



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the outcome of the tenth FCA. Accordingly, the ISO requests that the Commission accept the results of the tenth FCA within 120 days of this filing.

Respectfully submitted,

By: /s/ Kevin W. Flynn

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cc: Governance Participants (electronically) and entities listed in Attachment F.

# **Attachment A**





















ID	Name	Type	Capacity Zone ID	Capacity Zone Name	State	Load Zone	Status	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20
12600	UI Conservation and Load Management Programs	Demand	8500	Rest-of-Pool	CT	CT	Existing	70,392	70,392	70,392	70,392	70,392	70,392	67,958	67,958	67,958	67,958	70,392	70,392
12657	Efficiency Programs-2	Demand	8506	Rest-of-Pool	MA	WCMA	Existing	8,127	8,127	8,127	8,127	8,127	8,127	8,127	8,127	8,127	8,127	8,127	8,127
12670	ngrid_nema_fca1_eood	Demand	8508	Rest-of-Pool	MA	NEMA	Existing	98.12	98.12	98.12	98.12	98.12	98.12	98.12	98.12	98.12	98.12	98.12	98.12
12671	ngrid_nh_fca1_eood	Demand	8500	Rest-of-Pool	NH	NH	Existing	6,226	6,226	6,226	6,226	6,226	6,226	6,226	6,226	6,226	6,226	6,226	6,226
12672	ngrid_ri_fca1_eood	Demand	8506	Rest-of-Pool	RI	SEMA	Existing	169,124	169,124	169,124	169,124	169,124	169,124	169,124	169,124	169,124	169,124	169,124	169,124
12673	ngrid_sema_fca1_eood	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	130,783	130,783	130,783	130,783	130,783	130,783	130,783	130,783	130,783	130,783	130,783	130,783
12674	ngrid_wema_fca1_eood	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	185,479	185,479	185,479	185,479	185,479	185,479	185,479	185,479	185,479	185,479	185,479	185,479
12684	NSTAR EE NEMA	Demand	8506	Rest-of-Pool	MA	NEMA	Existing	375,665	375,665	375,665	375,665	375,665	375,665	375,665	375,665	375,665	375,665	375,665	375,665
12685	NSTAR EE SEMA	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	73,008	73,008	73,008	73,008	73,008	73,008	73,008	73,008	73,008	73,008	73,008	73,008
12693	PSNH CORE Energy Efficiency Programs	Demand	8500	Rest-of-Pool	NH	NH	Existing	50,911	50,911	50,911	50,911	50,911	50,911	50,911	50,911	50,911	50,911	50,911	50,911
12694	Acushnet Company - Ball Plant II - Combined	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111
12696	Heat and Power Project	Demand	8500	Rest-of-Pool	NH	NH	Existing	10.8	10.8	10.8	10.8	10.8	10.8	10.8	10.8	10.8	10.8	10.8	10.8
12705	Cape Light Compact Energy Efficiency Portfolio	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	39,604	39,604	39,604	39,604	39,604	39,604	39,604	39,604	39,604	39,604	39,604	39,604
12749	Correctional Complex	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	1,412	1,412	1,412	1,412	1,412	1,412	1,412	1,412	1,412	1,412	1,412	1,412
12753	MA SEMA state colleges	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	0,147	0,147	0,147	0,147	0,147	0,147	0,147	0,147	0,147	0,147	0,147	0,147
12754	Tewksbury State Hospital Cogenerator	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	0,734	0,734	0,734	0,734	0,734	0,734	0,734	0,734	0,734	0,734	0,734	0,734
12757	NHEC Energy Efficiency Programs	Demand	8500	Rest-of-Pool	NH	NH	Existing	0.63	0.63	0.63	0.63	0.63	0.63	0.63	0.63	0.63	0.63	0.63	0.63
12779	CPIN CT On-Peak	Demand	8500	Rest-of-Pool	CT	CT	Existing	1,004	1,004	1,004	1,004	1,004	1,004	1,004	1,004	1,004	1,004	1,004	1,004
12786	CSG Aggregation of DG and 24 hr lighting EE - NEMA1	Demand	8506	Rest-of-Pool	MA	NEMA	Existing	12,318	12,318	12,318	12,318	12,318	12,318	12,318	12,318	12,318	12,318	12,318	12,318
12790	CSG Aggregation of DG and 24 hr lighting EE - RI	Demand	8506	Rest-of-Pool	RI	RI	Existing	0.217	0.217	0.217	0.217	0.217	0.217	0.217	0.217	0.217	0.217	0.217	0.217
12791	CSG Aggregation of DG and 24 hr lighting EE - SEMA1	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	1,517	1,517	1,517	1,517	1,517	1,517	1,517	1,517	1,517	1,517	1,517	1,517
12799	UES CORE Energy Efficiency Programs	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	1,053	1,053	1,053	1,053	1,053	1,053	1,053	1,053	1,053	1,053	1,053	1,053
12801	University of Massachusetts Central Heating Plant-3	Demand	8500	Rest-of-Pool	NH	NH	Existing	7.64	7.64	7.64	7.64	7.64	7.64	7.64	7.64	7.64	7.64	7.64	7.64
12802	WMECO - Conservation & Load Management (CL&M) - Energy Efficiency Project	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	10.26	10.26	10.26	10.26	10.26	10.26	10.26	10.26	10.26	10.26	10.26	10.26
12806	Burlington Electric Department - On-Peak Efficiency	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	33,939	33,939	33,939	33,939	33,939	33,939	33,939	33,939	33,939	33,939	33,939	33,939
12822	CPIN MA NEMA OP	Demand	8506	Rest-of-Pool	VT	NEMA	Existing	6,071	6,071	6,071	6,071	6,071	6,071	5,993	5,993	5,993	5,993	6,071	6,071
12835	CPIN MA SEMA OP	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	6,561	6,561	6,561	6,561	6,561	6,561	6,561	6,561	6,561	6,561	6,561	6,561
12838	CPIN MA WC OP	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	0.23	0.23	0.23	0.23	0.23	0.23	0.23	0.23	0.23	0.23	0.23	0.23
12843	CPIN RI OP	Demand	8506	Rest-of-Pool	RI	RI	Existing	7,691	7,691	7,691	7,691	7,691	7,691	7,691	7,691	7,691	7,691	7,691	7,691
12845	Vermont Efficiency Portfolio-1	Demand	8500	Rest-of-Pool	VT	VT	Existing	107,571	107,571	107,571	107,571	107,571	107,571	105,001	105,001	105,001	105,001	107,571	107,571
13669	Manchester Methane LLC East Windsor Facility	Generator	8500	Rest-of-Pool	CT	CT	Existing	0.879	0.879	0.879	0.879	0.879	0.879	0.879	0.879	0.879	0.879	0.879	0.879
13673	MATEP (DIESEL)	Generator	8506	Rest-of-Pool	MA	NEMA	Existing	17.12	17.12	17.12	17.12	17.12	17.12	17.12	17.12	17.12	17.12	17.12	17.12

ID	Name	Type	Capacity Zone ID	Capacity Zone Name	State	Local Zone	Status	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20
15675	MATEP (COMBINED) (CYCLE)	Generator	8506	New England	MA	NEMA	Existing	42,515	42,515	42,515	42,515	42,515	42,515	42,515	42,515	42,515	42,515	42,515	42,515
13703	Verso VCG1	Generator	8500	Rest-of-Pool	ME	ME	Existing	42,483	42,483	42,483	42,483	42,483	42,483	42,483	42,483	42,483	42,483	42,483	42,483
13704	Verso VCG2	Generator	8500	Rest-of-Pool	ME	ME	Existing	45,167	45,167	45,167	45,167	45,167	45,167	45,167	45,167	45,167	45,167	45,167	45,167
13705	Verso VCG3	Generator	8500	Rest-of-Pool	ME	ME	Existing	43,399	43,399	43,399	43,399	43,399	43,399	43,399	43,399	43,399	43,399	43,399	43,399
13975	Connave Hydroelectric LLC	Generator	8500	Rest-of-Pool	ME	ME	Existing	0,042	0,042	0,042	0,042	0,036	0,036	0,036	0,036	0,036	0,036	0,036	0,036
14087	MAT3	Generator	8506	South East	MA	NEMA	Existing	11,573	11,573	11,573	11,573	11,573	11,573	11,573	11,573	11,573	11,573	11,573	11,573
14217	NORTHFIELD	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	292	292	292	292	292	292	292	292	292	292	292	292
14218	MOUNTAIN 2	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	292	292	292	292	281,75	281,75	281,75	281,75	281,75	281,75	281,75	281,75
14219	NORTHFIELD	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	292	292	292	292	292	292	292	292	292	292	292	292
14220	MOUNTAIN 4	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	292	292	292	292	292	292	292	292	292	292	292	292
14271	Amersco	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	0,748	0,748	0,748	0,748	0,748	0,748	0,748	0,748	0,748	0,748	0,748	0,748
14579	FG Energy Efficiency Portfolio 2011	Demand	8500	Rest-of-Pool	MA	WOMA	Existing	0,12	0,12	0,12	0,12	0,12	0,12	0,12	0,12	0,12	0,12	0,12	0,12
14580	UES Energy Efficiency Portfolio 2011	Demand	8500	Rest-of-Pool	NH	NH	Existing	0,264	0,264	0,264	0,264	0,264	0,264	0,264	0,264	0,264	0,264	0,264	0,264
14585	Granite Reliable Power Genco, LLC - ST	Generator	8500	Rest-of-Pool	NH	NH	Existing	14,034	14,034	14,034	14,034	26,748	26,748	26,748	26,748	26,748	26,748	26,748	26,748
14589	Rhode Island LFG Princeton Wind Farm	Generator	8506	New England	RI	RI	Existing	26	26	26	26	26	26	26	26	26	26	26	26
14610	Kleen Energy Project	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	0,161	0,161	0,161	0,161	0,421	0,421	0,421	0,421	0,421	0,421	0,421	0,421
14614	Valley Hydro (Station No. 5)	Generator	8500	Rest-of-Pool	CT	CT	Existing	620	620	620	620	620	620	620	620	620	620	620	620
14623	Templeton Wind Turbine	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	0,11	0,11	0,11	0,11	0,458	0,458	0,458	0,458	0,458	0,458	0,458	0,458
14652	Lambster Wind Berksville Wind Power	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	0,058	0,058	0,058	0,058	0,116	0,116	0,116	0,116	0,116	0,116	0,116	0,116
14661	Project	Generator	8500	Rest-of-Pool	NH	NH	Existing	3,019	3,019	3,019	3,019	8,179	8,179	8,179	8,179	8,179	8,179	8,179	8,179
14663	WVRE Crossroads	Generator	8500	Rest-of-Pool	MA	WOMA	Existing	1,754	1,754	1,754	1,754	6,092	6,092	6,092	6,092	6,092	6,092	6,092	6,092
14665	Record Hill Wind Kimberly-Clark Corp	Generator	8500	Rest-of-Pool	ME	ME	Existing	2,294	2,294	2,294	2,294	2,294	2,294	2,294	2,294	2,294	2,294	2,294	2,294
14706	Energy Independence Project	Generator	8500	Rest-of-Pool	CT	CT	Existing	13,375	13,375	13,375	13,375	13,375	13,375	13,375	13,375	13,375	13,375	13,375	13,375
15415	Dartmouth Power Expansion	Generator	8506	New England	MA	SEMA	Existing	19,942	19,942	19,942	19,942	19,942	19,942	19,942	19,942	19,942	19,942	19,942	19,942
15477	Units 2, 3, & 4 Plainfield Renewable Energy	Generator	8500	Rest-of-Pool	CT	CT	Existing	129,6	129,6	129,6	129,6	129,6	129,6	129,6	129,6	129,6	129,6	129,6	129,6
15586	Gardner Wind Turbine	Demand	8500	Rest-of-Pool	CT	CT	Existing	37,5	37,5	37,5	37,5	37,5	37,5	37,5	37,5	37,5	37,5	37,5	37,5
16296	Millford Hydro	Generator	8500	Rest-of-Pool	ME	ME	Existing	0,318	0,318	0,318	0,318	0,318	0,318	0,318	0,318	0,318	0,318	0,318	0,318
16523	Stillwater	Generator	8500	Rest-of-Pool	ME	ME	Existing	5,587	5,587	5,587	5,587	6,229	6,229	6,229	6,229	6,229	6,229	6,229	6,229
16525	Wadsway	Generator	8500	Rest-of-Pool	ME	ME	Existing	1,57	1,57	1,57	1,57	1,347	1,347	1,347	1,347	1,347	1,347	1,347	1,347
16547	Ut & L M Programs Victory Road	Demand	8500	Rest-of-Pool	CT	CT	Existing	3,443	3,443	3,443	3,443	2,869	2,869	2,869	2,869	2,869	2,869	2,869	2,869
16631	Dorchester PV Hilldale Ave Haverhill PV	Generator	8506	New England	MA	NEMA	Existing	0,316	0,316	0,316	0,316	0	0	0	0	0	0	0	0
16640	Railroad Street Reveve PV	Generator	8506	New England	MA	NEMA	Existing	0,27	0,27	0,27	0,27	0	0	0	0	0	0	0	0
16642	Rover Street Everett PV	Generator	8506	South East	MA	NEMA	Existing	0,245	0,245	0,245	0,245	0	0	0	0	0	0	0	0
16643	Main Street Whitinsville PV	Generator	8506	South East	MA	NEMA	Existing	0,168	0,168	0,168	0,168	0	0	0	0	0	0	0	0
16644	Efficiency Maine Trust Efficient Products	Generator	8506	New England	MA	SEMA	Existing	0,28	0,28	0,28	0,28	0	0	0	0	0	0	0	0
16651	Berlin Biopower	Demand	8500	Rest-of-Pool	NH	NH	Existing	45,766	45,766	45,766	45,766	45,766	45,766	45,766	45,766	45,766	45,766	45,766	45,766
16653	Jesswich Wind Farm 1	Generator	8506	South East	MA	NEMA	Existing	65,38	65,38	65,38	65,38	65,38	65,38	65,38	65,38	65,38	65,38	65,38	65,38
16657	Bangor Hydro OP	Demand	8500	Rest-of-Pool	ME	ME	Existing	0,148	0,148	0,148	0,148	0,298	0,298	0,298	0,298	0,298	0,298	0,298	0,298
16688	Nort	Generator	8500	Rest-of-Pool	CT	CT	Existing	11,232	11,232	11,232	11,232	11,232	11,232	11,232	11,232	11,232	11,232	11,232	11,232



ID	Name	Type	Capacity Zone ID	Capacity Zone Name	State	Lead Zone	Status	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	
37940	RTDR_50786_Seacoast (7510)	Demand	8500	Rest-of-Pool	NH	NH	Existing	0.392	0.392	0.392	0.392	0.392	0.392	0.392	0.392	0.392	0.392	0.392	0.392	0.392
37941	RTDR_50786_Springfield MA (7516)	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	0.692	0.692	0.692	0.692	0.692	0.692	0.692	0.692	0.692	0.692	0.692	0.692	0.692
37942	RTDR_50786_Vermont (7514)	Demand	8500	Rest-of-Pool	VT	VT	Existing	0.271	0.271	0.271	0.271	0.271	0.271	0.271	0.271	0.271	0.271	0.271	0.271	0.271
37943	RTDR_50786_Western CT (7503)	Demand	8500	Rest-of-Pool	CT	CT	Existing	0.309	0.309	0.309	0.309	0.309	0.309	0.309	0.309	0.309	0.309	0.309	0.309	0.309
37944	RTDR_50786_Western MA (7517)	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	0.117	0.117	0.117	0.117	0.117	0.117	0.117	0.117	0.117	0.117	0.117	0.117	0.117
37990	RTDR_50017_Bangor Hydro (7504)	Demand	8500	Rest-of-Pool	ME	ME	Existing	0.581	0.581	0.581	0.581	0.581	0.581	0.581	0.581	0.581	0.581	0.581	0.581	0.581
37991	RTDR_50017_Boston (7507)	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
37993	RTDR_50017_Eastern CT (7500)	Demand	8500	Rest-of-Pool	CT	CT	Existing	4.468	4.468	4.468	4.468	4.468	4.468	4.468	4.468	4.468	4.468	4.468	4.468	4.468
37994	RTDR_50017_Lower SEMA (7511)	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
37995	RTDR_50017_Maine (7505)	Demand	8500	Rest-of-Pool	ME	ME	Existing	4.912	4.912	4.912	4.912	4.912	4.912	4.912	4.912	4.912	4.912	4.912	4.912	4.912
37996	RTDR_50017_New Hampshire (7509)	Demand	8500	Rest-of-Pool	NH	NH	Existing	13.23	13.23	13.23	13.23	13.23	13.23	13.23	13.23	13.23	13.23	13.23	13.23	13.23
37997	RTDR_50017_North Shore (7508)	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
37998	RTDR_50017_Northern CT (7501)	Demand	8500	Rest-of-Pool	CT	CT	Existing	7.848	7.848	7.848	7.848	7.848	7.848	7.848	7.848	7.848	7.848	7.848	7.848	7.848
37999	RTDR_50017_Northwest Vermont (7513)	Demand	8500	Rest-of-Pool	VT	VT	Existing	2.308	2.308	2.308	2.308	2.308	2.308	2.308	2.308	2.308	2.308	2.308	2.308	2.308
38001	RTDR_50017_Portland Maine (7506)	Demand	8500	Rest-of-Pool	ME	ME	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
38004	RTDR_50017_Seacoast (7510)	Demand	8500	Rest-of-Pool	NH	NH	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
38005	RTDR_50017_Springfield MA (7516)	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	2.65	2.65	2.65	2.65	2.65	2.65	2.65	2.65	2.65	2.65	2.65	2.65	2.65
38006	RTDR_50017_Vermont (7514)	Demand	8500	Rest-of-Pool	VT	VT	Existing	0.54	0.54	0.54	0.54	0.54	0.54	0.54	0.54	0.54	0.54	0.54	0.54	0.54
38008	RTDR_50017_Western MA (7517)	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
38057	RTDR_50017_Efficiency Maine Trust (7508)	Demand	8500	Rest-of-Pool	ME	ME	Existing	50.441	50.441	50.441	50.441	50.441	50.441	50.441	50.441	50.441	50.441	50.441	50.441	50.441
38078	RTDR_50017_NFM Solar Power, LLC (7500)	Generator	8500	Rest-of-Pool	MA	WCMA	Existing	0.507	0.507	0.507	0.507	0.507	0.507	0.507	0.507	0.507	0.507	0.507	0.507	0.507
38089	RTDR_50017_Cycle Footprint Combined (7500)	Generator	8506	Rest-of-Pool	MA	SEMA	Existing	674	674	674	674	674	674	674	674	674	674	674	674	674
38114	RTDR_50017_East Bridgewater Solar Energy Project (7509)	Generator	8506	Rest-of-Pool	MA	SEMA	Existing	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85
38115	RTDR_50017_Harrington Street PV Project (7500)	Generator	8500	Rest-of-Pool	MA	WCMA	Existing	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.43	1.43
38120	RTDR_50017_Hydro (7509) - 3 (7500)	Demand	8500	Rest-of-Pool	ME	ME	Existing	2.43	2.43	2.43	2.43	2.43	2.43	2.43	2.43	2.43	2.43	2.43	2.43	2.43
38122	RTDR_50017_Central MA (7515) - 3 (7500)	Demand	8500	Rest-of-Pool	MA	WCMA	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
38123	RTDR_50017_Eastern CT (7500) - 3 (7500)	Demand	8500	Rest-of-Pool	CT	CT	Existing	6.055	6.055	6.055	6.055	6.055	6.055	6.055	6.055	6.055	6.055	6.055	6.055	6.055
38124	RTDR_50017_Lower SEMA (7511) - 3 (7500)	Demand	8506	Rest-of-Pool	MA	SEMA	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
38125	RTDR_50017_Maine (7505) - 3 (7500)	Demand	8500	Rest-of-Pool	ME	ME	Existing	58.299	58.299	58.299	58.299	58.299	58.299	58.299	58.299	58.299	58.299	58.299	58.299	58.299
38126	RTDR_50017_New Hampshire (7509) - 3 (7500)	Demand	8500	Rest-of-Pool	NH	NH	Existing	0	0	0	0	0	0	0	0	0	0	0	0	0
38128	RTDR_50017_Northern CT (7501) - 3 (7500)	Demand	8500	Rest-of-Pool	CT	CT	Existing	3.738	3.738	3.738	3.738	3.738	3.738	3.738	3.738	3.738	3.738	3.738	3.738	3.738
38129	RTDR_50017_Northwest Vermont (7513) - 3 (7500)	Demand	8500	Rest-of-Pool	VT	VT	Existing	21.382	21.382	21.382	21.382	21.382	21.382	21.382	21.382	21.382	21.382	21.382	21.382	21.382
38130	RTDR_50017_Norwalk Stamford (7509) - 3 (7500)	Demand	8500	Rest-of-Pool	CT	CT	Existing	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001





ID	Name	Type	Capacity Zone ID	Capacity Zone Name	State	Load Zone	Status	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	
38373	Holliston	Generator	8506 Southeast	MA	SEMA	Existing	1,523	1,523	1,523	1,523	0	0	0	0	0	0	0	0	0	0
38374	Plymouth	Generator	8506 Southeast	MA	SEMA	Existing	1.9	1.9	1.9	1.9	0	0	0	0	0	0	0	0	0	0
38375	Uxbridge	Generator	8506 Southeast	MA	SEMA	Existing	1.23	1.23	1.23	1.23	0	0	0	0	0	0	0	0	0	0
38376	Landcraft	Generator	8506 Southeast	MA	SEMA	Existing	1.35	1.35	1.35	1.35	0	0	0	0	0	0	0	0	0	0
38378	LSRHS	Generator	8506 Southeast	MA	SEMA	Existing	0.42	0.42	0.42	0.42	0	0	0	0	0	0	0	0	0	0
38380	Treasure Valley-SE	Generator	8500 Rest-of-Pool	MA	WCMA	Existing	2.07	2.07	2.07	2.07	0	0	0	0	0	0	0	0	0	0
38381	Belchertown Sec	Generator	8500 Rest-of-Pool	MA	WCMA	Existing	0.53	0.53	0.53	0.53	0	0	0	0	0	0	0	0	0	0
38388	SEMA1_2 CSG Aggregation of DG and 24 hr lighting EE -	Demand	8506 New England	MA	SEMA	Existing	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333
38389	WCMA1_2 Efficiency Maine Trust	Demand	8500 Rest-of-Pool	MA	WCMA	Existing	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333	2.333
38390	FC99	Demand	8500 Rest-of-Pool	ME	ME	Existing	4.049	4.049	4.049	4.049	4.049	4.049	4.049	4.049	4.049	4.049	4.049	4.049	4.049	4.049
38393	RTDR_51325_Maine	Demand	8500 Rest-of-Pool	ME	ME	Existing	43.2	43.2	43.2	43.2	43.2	43.2	43.2	43.2	43.2	43.2	43.2	43.2	43.2	43.2
38396	NEMA 1 - New T4	Demand	8506 Southeast	MA	NEMA	Existing	1	1	1	1	1	1	1	1	1	1	1	1	1	1
38398	NEMA 2 - New T4	Demand	8506 Southeast	MA	NEMA	Existing	1	1	1	1	1	1	1	1	1	1	1	1	1	1
38400	RI 1 - New T4	Demand	8506 Southeast	RI	RI	Existing	2.592	2.592	2.592	2.592	2.592	2.592	2.592	2.592	2.592	2.592	2.592	2.592	2.592	2.592
38401	RI 1 - Retrofit	Demand	8506 Southeast	RI	RI	Existing	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296
38402	SEMA 1 - New T4	Demand	8506 Southeast	MA	SEMA	Existing	4.644	4.644	4.644	4.644	4.644	4.644	4.644	4.644	4.644	4.644	4.644	4.644	4.644	4.644
38403	SEMA 1 - Retrofit	Demand	8506 Southeast	MA	SEMA	Existing	2.268	2.268	2.268	2.268	2.268	2.268	2.268	2.268	2.268	2.268	2.268	2.268	2.268	2.268
38404	WCMA 1 - New T4	Demand	8500 Rest-of-Pool	MA	WCMA	Existing	1	1	1	1	1	1	1	1	1	1	1	1	1	1
38485	CT DR	Demand	8500 Rest-of-Pool	CT	CT	Existing	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296
38502	WestMA_RTEG	Demand	8500 Rest-of-Pool	MA	WCMA	Existing	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296
355	BRANFORD 10	Generator	8500 Rest-of-Pool	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0	0
392	DEKTER	Generator	8500 Rest-of-Pool	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0	0
396	DEVON 10	Generator	8500 Rest-of-Pool	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0	0
420	FRANKLIN DRIVE 10	Generator	8500 Rest-of-Pool	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0	0
541	PROCTOR	Generator	8500 Rest-of-Pool	VT	VT	New	2.189	2.189	2.189	2.189	5.02	5.02	5.02	5.02	5.02	5.02	5.02	5.02	5.02	5.02
595	TORRINGTON	Generator	8500 Rest-of-Pool	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1226	TERMINAL 10	Generator	8506 Southeast	RI	RI	New	12	12	12	12	13.203	13.203	13.203	13.203	13.203	13.203	13.203	13.203	13.203	13.203
1342	TIVERTON POWER	Generator	8500 Rest-of-Pool	CT	CT	New	14	14	14	14	14	14	14	14	14	14	14	14	14	14
1343	LAKE ROAD 1	Generator	8500 Rest-of-Pool	CT	CT	New	14	14	14	14	14	14	14	14	14	14	14	14	14	14
1343	LAKE ROAD 2	Generator	8500 Rest-of-Pool	CT	CT	New	14	14	14	14	14	14	14	14	14	14	14	14	14	14
1344	LAKE ROAD 3	Generator	8500 Rest-of-Pool	CT	CT	New	14	14	14	14	14	14	14	14	14	14	14	14	14	14
1344	LAKE ROAD 4	Generator	8500 Rest-of-Pool	CT	CT	New	14	14	14	14	14	14	14	14	14	14	14	14	14	14
1385	Milford Power 1	Generator	8500 Rest-of-Pool	CT	CT	New	14	14	14	14	14	14	14	14	14	14	14	14	14	14
1385	Incremental	Generator	8500 Rest-of-Pool	CT	CT	New	14	14	14	14	14	14	14	14	14	14	14	14	14	14
1386	MILFORD POWER 2	Generator	8500 Rest-of-Pool	CT	CT	New	14	14	14	14	14	14	14	14	14	14	14	14	14	14
12581	CL&P - Conservation & Lead Management (CL&M) - Energy Efficiency Project	Demand	8500 Rest-of-Pool	CT	CT	New	84.501	84.501	84.501	84.501	84.501	84.501	84.501	84.501	84.501	84.501	84.501	84.501	84.501	84.501
12600	Programs	Demand	8500 Rest-of-Pool	CT	CT	New	3.255	3.255	3.255	3.255	3.255	3.255	3.255	3.255	3.255	3.255	3.255	3.255	3.255	3.255
12657	Unit CORE Energy Efficiency Programs-2 ngrid_nema_fea1_eood	Demand	8500 Rest-of-Pool	MA	WCMA	New	1.331	1.331	1.331	1.331	1.331	1.331	1.331	1.331	1.331	1.331	1.331	1.331	1.331	1.331
12670	ngrid_nh_fea1_eoodr	Demand	8506 New England	MA	NEMA	New	20.037	20.037	20.037	20.037	20.037	20.037	20.037	20.037	20.037	20.037	20.037	20.037	20.037	20.037
12672	ngrid_nh_fea1_eoodr	Demand	8500 Rest-of-Pool	NH	NH	New	0.944	0.944	0.944	0.944	0.944	0.944	0.944	0.944	0.944	0.944	0.944	0.944	0.944	0.944
12673	ngrid_ma_fea1_eood	Demand	8506 Southeast	RI	RI	New	31.017	31.017	31.017	31.017	31.017	31.017	31.017	31.017	31.017	31.017	31.017	31.017	31.017	31.017
12674	ngrid_wcma_fea1_eood	Demand	8506 Southeast	MA	SEMA	New	26.724	26.724	26.724	26.724	26.724	26.724	26.724	26.724	26.724	26.724	26.724	26.724	26.724	26.724
12684	NSTAR EE NEMA	Demand	8500 Rest-of-Pool	MA	WCMA	New	35.267	35.267	35.267	35.267	35.267	35.267	35.267	35.267	35.267	35.267	35.267	35.267	35.267	35.267
12685	NSTAR EE SEMA	Demand	8506 Southeast	MA	SEMA	New	60.48	60.48	60.48	60.48	60.48	60.48	60.48	60.48	60.48	60.48	60.48	60.48	60.48	60.48
12693	P-SNH CORE Energy Efficiency Programs	Demand	8500 Rest-of-Pool	NH	NH	New	6.099	6.099	6.099	6.099	6.099	6.099	6.099	6.099	6.099	6.099	6.099	6.099	6.099	6.099
12757	NHCC Energy Efficiency Programs	Demand	8500 Rest-of-Pool	NH	NH	New	0.436	0.436	0.436	0.436	0.436	0.436	0.436	0.436	0.436	0.436	0.436	0.436	0.436	0.436
12779	CPN CT On-Peak UES CORE Energy Efficiency Programs	Demand	8500 Rest-of-Pool	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12801	UES CORE Energy Efficiency Programs	Demand	8500 Rest-of-Pool	NH	NH	New	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758

ID	Name	Type	Capacity Zone ID	Capacity Zone Name	State	Load Zone	Status	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20
12822	Burlington Electric Department - On-Peak Efficiency	Demand	8500	Rest-of-Pool	VT	VT	New	0.293	0.293	0.293	0.293	0.293	0.293	0.402	0.402	0.402	0.402	0.293	0.293
12832	CPIN MA NEMA OP	Demand	8506	Southeast	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
12835	CPIN MA SEMA OP	Demand	8506	Southeast	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
12838	CPIN MA WC OP	Demand	8500	Rest-of-Pool	MA	WCMA	New	0	0	0	0	0	0	0	0	0	0	0	0
12845	Vermont Efficiency Portfolio-1	Demand	8500	Rest-of-Pool	VT	VT	New	0	0	0	0	0	0	2.57	2.57	2.57	0	0	0
38057	Efficiency Maine Trust	Demand	8500	Rest-of-Pool	ME	ME	New	18.279	18.279	18.279	18.279	18.279	18.279	20.975	20.975	20.975	18.279	18.279	18.279
38124	RDR_50017_Lower SEMA (7511) - 3	Demand	8506	Southeast New England	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38126	RDR_50017_New Hampshire (7509) - 3	Demand	8500	Rest-of-Pool	NH	NH	New	0	0	0	0	0	0	0	0	0	0	0	0
38127	RDR_50017_North Shores (7508) - 3	Demand	8506	New England	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38135	RDR_50017_Springfield MA (7516) - 3	Demand	8500	Rest-of-Pool	MA	WCMA	New	1.08	1.08	1.08	1.08	1.08	1.08	1.08	1.08	1.08	1.08	1.08	1.08
38136	RDR_50017_Vermont (7514) - 3	Demand	8500	Rest-of-Pool	VT	VT	New	0	0	0	0	0	0	0	0	0	0	0	0
38206	Bridgeport Harbor 6 Generator	Generator	8500	Rest-of-Pool	CT	CT	New	484.3	484.3	484.3	484.3	484.3	484.3	484.3	484.3	484.3	484.3	484.3	484.3
38216	WCMA CHP	Demand	8500	Rest-of-Pool	MA	WCMA	New	9.086	9.086	9.086	9.086	9.086	9.086	9.086	9.086	9.086	9.086	9.086	9.086
38219	WMCO EE WCMA	Demand	8500	Rest-of-Pool	MA	WCMA	New	25.92	25.92	25.92	25.92	25.92	25.92	25.92	25.92	25.92	25.92	25.92	25.92
38254	PVEC LLC	Generator	8500	Rest-of-Pool	MA	WCMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38259	Brockton Power Co	Generator	8506	Southeast	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38310	Canal 3	Generator	8506	Southeast	MA	SEMA	New	333	333	333	333	333	333	333	333	333	333	333	333
38311	NEMA CHP	Demand	8506	Southeast	MA	SEMA	New	1.372	1.372	1.372	1.372	1.372	1.372	1.372	1.372	1.372	1.372	1.372	1.372
38387	CSG Aggregation of DG and 24 hr lighting EE - NEMA1_2	Demand	8506	Southeast New England	MA	NEMA	New	2.743	2.743	2.743	2.743	2.743	2.743	2.743	2.743	2.743	2.743	2.743	2.743
38393	RDR_51325_Maine (7505)	Demand	8500	Rest-of-Pool	ME	ME	New	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2
38396	NEMA 1 - New T4	Demand	8506	Southeast	MA	NEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38398	NEMA 2 - New T4	Demand	8506	Southeast	MA	NEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38421	Jericho Power	Generator	8500	Rest-of-Pool	NH	NH	New	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
38437	Jessup Wind II	Generator	8506	Southeast	MA	NEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38438	Deerfield Wind Project	Generator	8500	Rest-of-Pool	MA	WCMA	New	8.1	8.1	8.1	8.1	8.1	8.1	8.1	8.1	8.1	8.1	8.1	8.1
38440	Cottage St PV	Generator	8500	Rest-of-Pool	MA	WCMA	New	1.635	1.635	1.635	1.635	1.635	1.635	1.635	1.635	1.635	1.635	1.635	1.635
38441	UI RCP BPT FC	Generator	8500	Rest-of-Pool	CT	CT	New	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52
38442	UI RCP NH FC	Generator	8500	Rest-of-Pool	CT	CT	New	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52
38444	SITHE_MASSENA CP 2019-20	Import	8500	Rest-of-Pool	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0
38445	Bayside	Import	8500	Rest-of-Pool	CT	CT	New	40	40	40	40	40	40	40	40	40	40	40	40
38447	Boston PeakDR	Demand	8506	Southeast	MA	NEMA	New	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7	2.7
38448	Rensselaer Cogen	Import	8500	Rest-of-Pool	MA	NEMA	New	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4
38449	Roseton 1 19-20	Import	8500	Rest-of-Pool	MA	NEMA	New	532.45	532.45	532.45	532.45	532.45	532.45	532.45	532.45	532.45	532.45	532.45	532.45
38451	Roseton 2 19-20	Import	8500	Rest-of-Pool	MA	NEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38452	HQ_HG_Summer_19-20	Import	8500	Rest-of-Pool	MA	NEMA	New	52	52	52	52	52	52	52	52	52	52	52	52
38454	HQ_NB_Summer_19-20	Import	8500	Rest-of-Pool	MA	NEMA	New	0	0	0	0	0	0	0	0	0	0	0	0
38456	HQ_NY_Summer_19-20	Import	8500	Rest-of-Pool	MA	NEMA	New	300	300	300	300	300	300	300	300	300	300	300	300
38458	HQ_PIL_Summer_19-20	Import	8500	Rest-of-Pool	MA	NEMA	New	19	19	19	19	19	19	19	19	19	19	19	19
38459	HQ_PIL_Yearly_19-20	Import	8500	Rest-of-Pool	MA	NEMA	New	147	147	147	147	147	147	147	147	147	147	147	147
38462	Seneca Grandfathered	Import	8500	Rest-of-Pool	MA	NEMA	New	44.95	44.95	44.95	44.95	44.95	44.95	44.95	44.95	44.95	44.95	44.95	44.95
38463	Seneca Non-Grandfathered	Import	8500	Rest-of-Pool	MA	NEMA	New	5	5	5	5	5	5	5	5	5	5	5	5
38466	BROOME_2_LFGE CP 2019-20	Import	8500	Rest-of-Pool	CT	CT	New	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6
38468	Norfolk-Walpole Co-Gen	Demand	8506	New England	MA	SEMA	New	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296	1.296
38475	Hoosac Wind Project	Generator	8500	Rest-of-Pool	MA	WCMA	New	3.942	3.942	3.942	3.942	3.942	3.942	3.942	3.942	3.942	3.942	3.942	3.942
38480	Hubbardston SE	Generator	8506	Rest-of-Pool	MA	WCMA	New	1.295	1.295	1.295	1.295	1.295	1.295	1.295	1.295	1.295	1.295	1.295	1.295
38481	OSP Phase III	Generator	8500	Rest-of-Pool	RI	RI	New	0	0	0	0	0	0	0	0	0	0	0	0
38483	Ngrid_SEMA_CHP	Demand	8506	Southeast	MA	SEMA	New	1.692	1.692	1.692	1.692	1.692	1.692	1.692	1.692	1.692	1.692	1.692	1.692
38487	CT RTDR	Demand	8500	Rest-of-Pool	CT	CT	New	2.16	2.16	2.16	2.16	2.16	2.16	2.16	2.16	2.16	2.16	2.16	2.16

ID	Name	Type	Capacity Zone ID	Capacity Zone Name	State	Load Zone	Status	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	
38494	24 Bourlier Rd Leicester PV	Generator	8500	Rest-of-Pool Southeast	MA	WCMA	New	0.248	0.248	0.248	0.248	0	0	0	0	0	0	0	0	0
38495	Deepwater Wind Block Island	Generator	8506	New England RI	RI	RI	New	6.83	6.83	6.83	6.83	14.1	14.1	14.1	14.1	14.1	14.1	14.1	14.1	14.1
38498	Eastern CT RTDR2	Demand	8500	Rest-of-Pool CT	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38499	Bottom RTDR A	Demand	8506	Southeast MA	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38500	Mass Mid-State Solar	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	7.11	7.11	7.11	7.11	0	0	0	0	0	0	0	0	0
38501	Concord Steam	Generator	8500	Rest-of-Pool NH	NH	NH	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38504	Burnhillville Energy Center 3	Generator	8506	New England RI	RI	RI	New	485	485	485	485	485	485	485	485	485	485	485	485	485
38510	City of Gardner - Mill St. Solar	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.392	0.392	0.392	0	0	0	0	0	0	0	0	0	0
38511	Fore River Peak	Generator	8506	Southeast MA	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38512	SEMA 1 - New	Demand	8506	Southeast MA	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38513	RI 1 - New	Demand	8506	Southeast RI	RI	RI	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38514	CT 1 - New	Demand	8500	Rest-of-Pool CT	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38516	Frie Boulevard Hydro Import 2019-20	Import	8500	Rest-of-Pool			New	0	0	0	0	0	0	0	0	0	0	0	0	0
38517	CT 1A - New	Demand	8500	Rest-of-Pool CT	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38518	CT 1B - New	Demand	8500	Rest-of-Pool CT	CT	CT	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38519	Carr Street Generating Station Import 2019-20	Import	8500	Rest-of-Pool			New	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6
38520	LIEVRE RIVER Import	Import	8500	Rest-of-Pool			New	0	0	0	0	0	0	0	0	0	0	0	0	0
38524	ME 1 - New	Demand	8500	Rest-of-Pool ME	ME	ME	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38527	Grafton WD	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.715	0.715	0.715	0.715	0	0	0	0	0	0	0	0	0
38528	29 Oxford Rd Charlton PV	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.275	0.275	0.275	0.275	0	0	0	0	0	0	0	0	0
38530	Mattapoisett 2	Generator	8506	Southeast MA	MA	SEMA	New	0.316	0.316	0.316	0.316	0	0	0	0	0	0	0	0	0
38531	Mattapoisett 1	Generator	8506	Southeast MA	MA	SEMA	New	0.316	0.316	0.316	0.316	0	0	0	0	0	0	0	0	0
38532	Leominster-South St.	Generator	8506	Southeast MA	MA	SEMA	New	1.409	1.409	1.409	1.409	0	0	0	0	0	0	0	0	0
38533	Berlin 1	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.347	0.347	0.347	0.347	0	0	0	0	0	0	0	0	0
38534	Millbury Solar	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	1.638	1.638	1.638	1.638	0	0	0	0	0	0	0	0	0
38536	RF 19-20	Import	8500	Rest-of-Pool			New	0	0	0	0	0	0	0	0	0	0	0	0	0
38537	RAH 19-20	Import	8500	Rest-of-Pool			New	31	31	31	31	31	31	31	31	31	31	31	31	31
38538	Groton Road Shirley PV	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.415	0.415	0.415	0.415	0	0	0	0	0	0	0	0	0
38539	40 Auburn rd Millbury PV	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.248	0.248	0.248	0.248	0	0	0	0	0	0	0	0	0
38543	Carpenter Hill Rd Charlton PV	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.368	0.368	0.368	0.368	0	0	0	0	0	0	0	0	0
38544	17 Kelly Rd Sturbridge PV	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.372	0.372	0.372	0.372	0	0	0	0	0	0	0	0	0
38545	50 River Rd Sturbridge PV	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.372	0.372	0.372	0.372	0	0	0	0	0	0	0	0	0
38548	Fall River-Commerce	Generator	8506	Southeast MA	MA	SEMA	New	0.535	0.535	0.535	0.535	0	0	0	0	0	0	0	0	0
38551	Fall River - Innovation Control Area Backed	Generator	8506	Southeast MA	MA	SEMA	New	1.748	1.748	1.748	1.748	0	0	0	0	0	0	0	0	0
38552	2019-20	Import	8500	Rest-of-Pool			New	110	110	110	110	110	110	110	110	110	110	110	110	110
38553	Antrim Wind Resource	Generator	8500	Rest-of-Pool NH	NH	NH	New	5	5	5	5	9.9	9.9	9.9	9.9	9.9	9.9	9.9	9.9	9.9
38555	Berlin 2	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.347	0.347	0.347	0.347	0	0	0	0	0	0	0	0	0
38556	Berlin 3	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.347	0.347	0.347	0.347	0	0	0	0	0	0	0	0	0
38558	Fall River-Ubridge	Generator	8506	Southeast MA	MA	SEMA	New	1.474	1.474	1.474	1.474	0	0	0	0	0	0	0	0	0
38559	Berlin 4	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.347	0.347	0.347	0.347	0	0	0	0	0	0	0	0	0
38560	Grafton	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0.925	0.925	0.925	0.925	0	0	0	0	0	0	0	0	0
38561	True North	Generator	8506	Southeast MA	MA	SEMA	New	2.585	2.585	2.585	2.585	0	0	0	0	0	0	0	0	0
38562	Franklin 1	Generator	8506	Southeast MA	MA	SEMA	New	1.499	1.499	1.499	1.499	0	0	0	0	0	0	0	0	0
38563	Palmer	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38564	Arnold-Summer St	Generator	8506	Southeast MA	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38565	Franklin 2	Generator	8506	Southeast MA	MA	SEMA	New	2.146	2.146	2.146	2.146	0	0	0	0	0	0	0	0	0
38566	Norton 1	Generator	8506	Southeast MA	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38567	Billerica	Generator	8500	Rest-of-Pool MA	MA	WCMA	New	2.307	2.307	2.307	2.307	0	0	0	0	0	0	0	0	0
38568	Norton 2	Generator	8506	Southeast MA	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38569	WesternMASS RTDR	Demand	8500	Rest-of-Pool MA	MA	WCMA	New	0.864	0.864	0.864	0.864	0.864	0.864	0.864	0.864	0.864	0.864	0.864	0.864	0.864
38571	Norton 3	Generator	8506	Southeast MA	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38572	Norton 4	Generator	8506	Southeast MA	MA	SEMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0

ID	Name	Type	Capacity Zone ID	Capacity Zone Name	State	Load Zone	Status	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	
38573	Rutland	Generator	8500	Rest-of-Pool	MA	WCMA	New	0	0	0	0	0	0	0	0	0	0	0	0	0
38574	Route 57	Generator	8500	Rest-of-Pool	MA	WCMA	New	0.739	0.739	0.739	0.739	0	0	0	0	0	0	0	0	0
38575	Agawam Solar	Generator	8500	Rest-of-Pool	MA	WCMA	New	0.702	0.702	0.702	0.702	0	0	0	0	0	0	0	0	0
38576	Whately	Generator	8500	Rest-of-Pool	MA	WCMA	New	0.617	0.617	0.617	0.617	0	0	0	0	0	0	0	0	0
38577	Holiday Hill Community Wind	Generator	8500	Rest-of-Pool	MA	WCMA	New	0.784	0.784	0.784	0.784	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2
38579	Rehoboth	Generator	8506	Southeast	MA	SEMA	New	1.093	1.093	1.093	1.093	0	0	0	0	0	0	0	0	0
38580	Amesbury	Generator	8506	Southeast	MA	SEMA	New	2.312	2.312	2.312	2.312	0	0	0	0	0	0	0	0	0
38581	Tyngsborough	Generator	8500	Rest-of-Pool	MA	WCMA	New	1.283	1.283	1.283	1.283	0	0	0	0	0	0	0	0	0
38582	Norton MA	Generator	8506	Southeast	MA	SEMA	New	0.675	0.675	0.675	0.675	0	0	0	0	0	0	0	0	0
38583	Agawam II	Generator	8500	Rest-of-Pool	MA	WCMA	New	0.804	0.804	0.804	0.804	0	0	0	0	0	0	0	0	0
38584	Bridgewater	Generator	8506	New England	MA	SEMA	New	0.462	0.462	0.462	0.462	0	0	0	0	0	0	0	0	0

# **Attachment B**

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc.

)

Docket No. ER16-\_\_\_\_-000

**TESTIMONY OF STEPHEN J. ROURKE**

1    **Q:    PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

2    A:    My name is Stephen J. Rourke. I am Vice President of System Planning with ISO  
3           New England Inc. (the “ISO”). My business address is One Sullivan Road,  
4           Holyoke, Massachusetts 01040.

5

6    **Q:    PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND  
7           WORK EXPERIENCE.**

8    A:    I have a B.S. in Electrical Engineering from Worcester Polytechnic Institute and a  
9           M.B.A. from Western New England University. In my current position as Vice  
10          President of System Planning, I am responsible for planning for a reliable New  
11          England bulk power system according to prescribed reliability standards and  
12          guidelines of the Northeast Power Coordinating Council (“NPCC”) and the North  
13          American Electric Reliability Corporation (“NERC”); overseeing development of  
14          the annual Regional System Plan; analysis and approval of new transmission and  
15          generation interconnection projects, including the approval of qualification of  
16          generating capacity resources, demand resources, and import capacity resources

1 to participate in the Forward Capacity Auction<sup>1</sup> (“FCA”); implementing the  
2 Federal Energy Regulatory Commission (“Commission” or “FERC”) approved  
3 generator interconnection process; developing the ISO’s findings for  
4 Transmission Cost Allocation; and supporting the capacity market in New  
5 England.

6  
7 Previously, I served as the ISO’s Director, Reliability and Operations Services. I  
8 was also a former manager of the Rhode Island—Eastern Massachusetts—  
9 Vermont Energy Control (“REMVEC”) center in Westborough, Massachusetts  
10 and former manager of marketing operations for Northeast Utilities/Select Energy  
11 Inc. in Berlin, Connecticut. I have over 30 years of experience in the operations  
12 and planning of the New England bulk power system.

13  
14 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 **A:** The purpose of my testimony is to certify that resources participating in the tenth  
16 FCA, which was held on February 8, 2016, were properly qualified in accordance  
17 with Section III.13.1 of the Tariff. Section III.13.8.2 (b) of the Tariff requires that  
18 documentation regarding the competitiveness of the FCA be filed with the  
19 Commission. Section III.13.8.2 (b) states that such documentation may include a  
20 certification from the ISO that all entities offering and bidding in the FCA were  
21 properly qualified in accordance with Section III.13.1 of the Tariff. My testimony

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<sup>1</sup> Capitalized terms used but not otherwise defined in this testimony have the meanings ascribed thereto in the ISO’s Transmission, Markets and Services Tariff (the “Tariff”). Section III of the Tariff is Market Rule 1.

1 provides such certification.

2

3 **Q: WERE ALL RESOURCES OFFERING AND BIDDING IN THE TENTH**  
4 **FCA HELD ON FEBRUARY 8, 2016 PROPERLY QUALIFIED IN**  
5 **ACCORDANCE WITH TARIFF SECTION III.13.1?**

6 A: Yes. Section III.13.1 of the Tariff sets forth the process for qualification in the  
7 FCA. In my role as Vice President of System Planning, I was responsible for  
8 overseeing the qualification of all resources in the tenth FCA held on February 8,  
9 2016. I certify that all resources offering and bidding in the tenth FCA were  
10 properly qualified in accordance with Section III.13.1 of the Tariff. In a  
11 November 10, 2015 informational filing with the Commission, the ISO provided  
12 resources qualified to participate in the tenth FCA.<sup>2</sup> The Commission approved  
13 the Informational Filing on January 21, 2016.<sup>3</sup>

14

15 **Q: WHAT WAS YOUR ROLE IN THE RELIABILITY REVIEW OF THE**  
16 **VARIOUS DE-LIST BIDS?**

17 A: As the Vice President of System Planning, I oversaw the reliability review of all  
18 submitted de-list bids.

19

20 **Q: PLEASE DESCRIBE THE ISO'S REVIEW OF DE-LIST BIDS.**

---

<sup>2</sup> *ISO New England Inc.*, Informational Filing for Qualification in the Forward Capacity Market, Docket No. ER16-308-000 (filed November 10, 2015) (“Informational Filing”).

<sup>3</sup> *Order Accepting Informational Filing*, 154 FERC ¶ 61,041 (2016) (“Informational Filing Order”).



1 A: Under the Tariff, all existing resources participate in the FCA, unless the resource  
2 submits a de-list bid.<sup>4</sup> There are two types of review performed by the ISO on the  
3 de-list bids.

4  
5 **Q: WHAT IS THE FIRST TYPE OF REVIEW?**

6 A: As described in the Informational Filing, the ISO's Internal Market Monitor  
7 ("IMM") reviews Permanent and Static De-List Bids to determine whether the  
8 bids are consistent with the resource's net risk-adjusted going forward and  
9 opportunity costs. This review is not performed for Dynamic De-List Bids, which  
10 are submitted during the auction itself if the price drops below a prescribed  
11 threshold. For the tenth FCA, this threshold was \$5.50/kW-month.

12  
13 **Q: WHAT IS THE OTHER TYPE OF REVIEW THAT THE ISO PERFORMS  
14 WITH REGARD TO DE-LIST BIDS?**

15 A: Prior to each FCA, pursuant to Section III.13.2.5.2.5 of the Tariff, the ISO  
16 reviews each Permanent De-List Bid, Static De-List Bid, and Export Bid to  
17 determine if the capacity associated with the bid is needed for reliability during  
18 the Capacity Commitment Period associated with the FCA. The Tariff provides  
19 that capacity will be needed for reliability if the absence of that capacity would  
20 result in violation of any NERC, NPCC, or ISO criteria.<sup>5</sup> If the capacity  
21 associated with the de-list bid is determined not to be needed for reliability, and

---

<sup>4</sup> Section III.13.2.3.2(c) of the Tariff.

<sup>5</sup> Section III.13.2.5.2.5 of the Tariff.

1 the auction price falls below the de-list bid price, the capacity associated with the  
2 bid is removed from the auction.

3

4 **Q: FOR THE TENTH FCA, HOW MANY DE-LIST BIDS DID THE ISO**  
5 **REVIEW FOR RELIABILITY?**

6 **A:** A total of 1,382 MW of pre-auction de-list bids were submitted for the tenth FCA.  
7 However, pursuant to Tariff Section III.13.1.2.3.2.1.1.2, prior to the auction, some  
8 participants elected to withdraw their Static De-list Bids. In addition, also prior to  
9 the auction, 19 MW of the de-list bids were converted into Non-Price Retirement  
10 Requests (“NPRRs”). As a result, a total of 512 MW of Static De-list Bids were  
11 reviewed for reliability. Because the auction price did not go below \$5.50/kW-  
12 month (*i.e.*, the threshold for review of Dynamic De-List Bids prescribed for the  
13 tenth FCA), no Dynamic De-List Bids were submitted. Finally, no Permanent  
14 De-list Bids or Export Bids were submitted for the tenth FCA.

15

16 **Q: DID THE ISO REVIEW SHOW THE NEED TO RETAIN FOR**  
17 **RELIABILITY ANY RESOURCES THAT SUBMITTED DE-LIST BIDS**  
18 **FOR THE TENTH FCA?**

19 **A:** No. The ISO did not reject any de-list bid that it studied for the tenth FCA.

20

21 **Q: FOR THE TENTH FCA, HOW MANY MW OF NPRRS DID THE ISO**  
22 **REVIEW FOR RELIABILITY?**

1 A: For the tenth FCA, a total of 17 NPRRs representing 728 MW of retirements were  
2 submitted<sup>6</sup> and reviewed for reliability pursuant to Tariff Section III.13.2.5.2.5  
3 and ISO Planning Procedure No. 10.<sup>7</sup>

4

5 **Q: DID THE ISO REVIEW SHOW THE NEED TO RETAIN FOR**  
6 **RELIABILITY ANY RESOURCES THAT SUBMITTED NPRRS FOR**  
7 **THE TENTH FCA?**

8 A: No.

9

10 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

11 A: Yes.

---

<sup>6</sup> NPRR submissions are available at: <http://www.iso-ne.com/system-planning/resource-planning/nonprice-retirement>

<sup>7</sup> “Planning Procedure to Support the Forward Capacity Market”

1 I declare that the foregoing is true and correct.

2

3

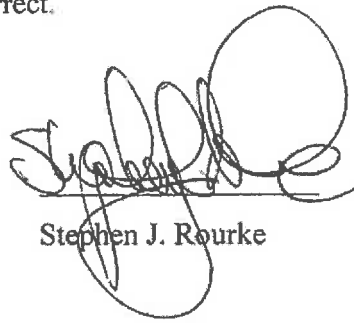
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8 February 29, 2016



Stephen J. Rourke

# **Attachment C**

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc.

)

Docket No. ER16-\_\_\_\_-000

**TESTIMONY OF ROBERT G. ETHIER  
ON BEHALF OF ISO NEW ENGLAND INC.**

1 **Q: PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

2 A: My name is Robert G. Ethier. I am employed by ISO New England Inc. (the  
3 "ISO") as Vice President of Market Operations. My business address is One  
4 Sullivan Road, Holyoke, Massachusetts 01040.

5

6 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND  
7 WORK EXPERIENCE.**

8 A: I have a Bachelor of Arts degree in Economics from Yale University, a Masters in  
9 Resource Economics from Cornell University, and a Ph.D. in Resource  
10 Economics from Cornell University. Since 2000, I have worked at the ISO in  
11 various roles. I was responsible for Market Monitoring for nearly four years and  
12 Resource Adequacy for more than two years before becoming Vice President of  
13 Market Development in July 2008. In July 2014, I took on my current role as  
14 Vice President of Market Operations. Before 2000, I was a Senior Associate at  
15 Stratus Consulting with responsibility for energy market modeling.

16

17 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

18 A: My testimony explains the auction prices resulting from the recently conducted

1 tenth Forward Capacity Auction (“FCA”). The tenth FCA was held on February  
2 8, 2016.

3  
4 **Q: WHAT WAS YOUR ROLE IN THE DEVELOPMENT OF THE LIST OF**  
5 **RESOURCES THAT RECEIVED CAPACITY SUPPLY OBLIGATIONS**  
6 **IN THE TENTH FCA?**

7 A: Section III.13.8.2 (a) of the ISO’s Transmission, Markets and Services Tariff  
8 (“Tariff”), requires the ISO to provide a list of resources that received Capacity  
9 Supply Obligations in each Capacity Zone and the size of the Capacity Supply  
10 Obligations. The ISO has provided this information in Attachment A to this  
11 filing. As the Vice President of Market Operations, Attachment A was developed  
12 under my supervision and direction.

13  
14 **Q: WHAT CAPACITY ZONES WERE MODELLED IN THE TENTH FCA?**

15 A: The ISO modeled two Capacity Zones in the tenth FCA: The Southeastern New  
16 England (“SENE”) Capacity Zone and the Rest-of-Pool Capacity Zone. The  
17 SENE Capacity Zone includes the Northeastern Massachusetts/Boston,  
18 Southeastern Massachusetts, and Rhode Island Load Zones. The Rest-of-Pool  
19 Capacity Zone includes the Connecticut, Maine, Western/Central Massachusetts,  
20 New Hampshire, and Vermont Load Zones. As detailed in the ISO’s  
21 Informational Filing for the tenth FCA, the Local Sourcing Requirement for the  
22 SENE Capacity Zone is 10,028 MW.<sup>1</sup>

23  

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<sup>1</sup> Informational Filing for Qualification in the Forward Capacity Market at page 9, filed on November 10, 2016 in Docket No. ER16-308-000.

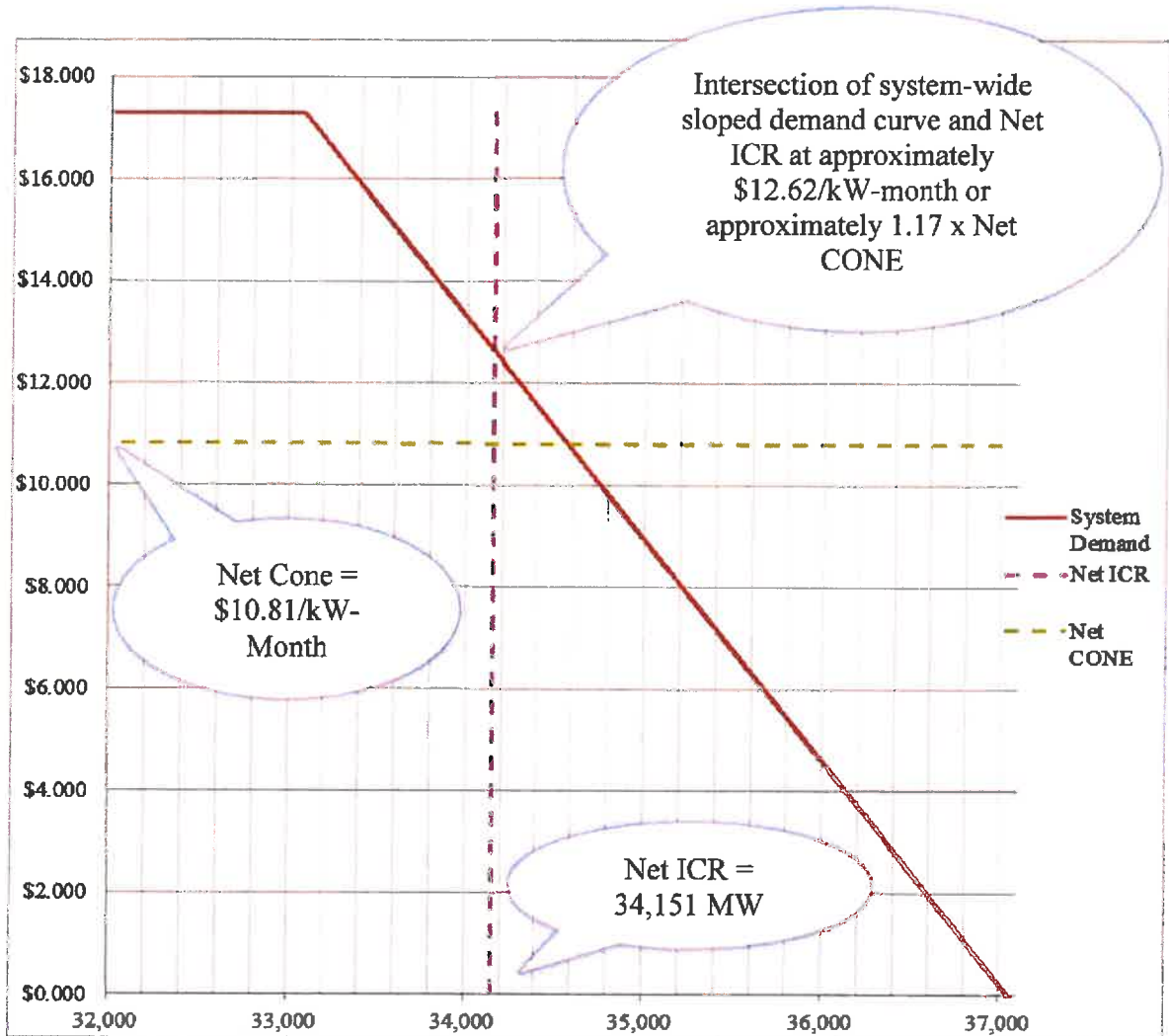
1 **Q: PLEASE DESCRIBE THE SYSTEM-WIDE SLOPED DEMAND CURVE**

2 **A:** The system-wide sloped demand curve's shape is defined by pertinent financial  
3 and reliability parameters. At prices below the Forward Capacity Auction  
4 Starting Price of \$17.296/kW-month, the system-wide quantity demanded  
5 increases linearly as price decreases. The demand curve is designed to procure  
6 over time capacity sufficient to meet the resource adequacy requirement for the  
7 New England Control Area, the Net Installed Capacity Requirement ("NICR").  
8 The demand curve is defined in part by an administrative Net CONE value of  
9 \$10.81/kW-month, which is the estimated capacity market revenue a combined  
10 cycle unit would need in its first year of operation. The demand curve is designed  
11 to ensure that prospective resource developers are able to recover just enough  
12 money in the New England markets to make it financially worth their while to  
13 build a power plant in New England when the region is short of its resource  
14 target. Therefore, the Net CONE value is used as the basis for the demand curve,  
15 setting its height (at 1.6 x Net CONE) and influencing its shape for the tenth FCA.  
16 The sloped portion of the demand curve begins at quantities to the left of NICR  
17 and reaches a price of zero well to the right of NICR. It intersects the Net CONE  
18 value to the right of NICR. Beginning with FCA 9, the system-wide sloped  
19 demand curve replaced NICR as the determinant of system-wide capacity demand  
20 for purposes of clearing the Forward Capacity Auction. As such, it was again  
21 applied in the tenth FCA to determine the intersection of system-wide aggregate  
22 supply and system-wide quantity demanded. For the tenth FCA, sloped demand  
23 curves were not applied at the zonal level.



1 Q: CAN YOU PROVIDE A GRAPH OF THE SYSTEM-WIDE SLOPED  
2 DEMAND CURVE FOR FCA 10?

3 A: Yes. Below is a graph of the system-wide sloped demand curve, Net CONE, and  
4 NICR beginning at 32,000 MW:  
5



6

7

8 Q: WHAT CAUSED THE DESCENDING CLOCK AUCTION TO CLOSE?

9 A: The auction bound system-wide when a new capacity offer was withdrawn,  
10 resulting in system-wide supply falling short of system-wide demand in the fourth

1 round of the auction. One additional round was conducted for the New  
2 Brunswick external interface because at the \$5.500/kW-month end-of-round price  
3 of the fourth round, supply over the New Brunswick external interface continued  
4 to exceed the interface's Capacity Transfer Limit.

5

6 **Q: WHAT WERE THE PRICES FOR THE CAPACITY ZONES?**

7 A: The auction commenced with a starting price of \$17.296/kW-month and  
8 concluded for the SENE and Rest-of-Pool Capacity Zones after four rounds.  
9 Resources in those Capacity Zones will be paid at the Capacity Clearing Price set  
10 pursuant to the system-wide sloped demand curve, which was \$7.030/kW-month.<sup>2</sup>

11

12 **Q: WHY WAS THE CAPACITY CLEARING PRICE \$7.030/KW-MONTH IN**  
13 **THE REST-OF-POOL AND SENE CAPACITY ZONES?**

14 A: In the tenth FCA, a non-rationable offer was withdrawn at \$7.029/kW-month,  
15 causing system-wide supply to fall short of system-wide demand. This marginal  
16 offer cleared the auction, thereby setting the Capacity Clearing Price in the Rest-  
17 of-Pool and SENE Capacity Zones at \$7.030/kW-month.

18

19 **Q: BECAUSE IT WAS NON-RATIONABLE, DID THE MARGINAL OFFER**  
20 **PREVENT CLEARING PRECISELY THE QUANTITY DEMANDED AT**  
21 **THE CAPACITY CLEARING PRICE?**

---

<sup>2</sup> Existing resources with multi-year obligations from previous auctions will be paid based on the Capacity Clearing Price in the auction in which they originally cleared. Self-supplied resources will not be paid through the FCM.

1 A: Yes. The marginal offer was non-rationable, and larger than needed to meet  
2 system-wide demand at the Capacity Clearing Price of \$7.030/kW-month.

3

4 **Q: WHY WAS MORE SUPPLY CLEARED THAN DEMANDED AT THE**  
5 **CAPACITY CLEARING PRICE?**

6 A: In the specific area where supply and demand intersect, the presence of non-  
7 rationable offers may present a number of potential solutions regarding which  
8 resources should clear and at what prices. In order to determine which resources  
9 should clear, at what quantities and at what price, the ISO utilizes the FCM  
10 capacity clearing engine. The objective of the capacity clearing engine is to  
11 maximize social surplus. Social surplus (sometimes called social welfare) is in  
12 this case the sum of consumer surplus (the difference between the amount that  
13 consumers would be willing to pay as defined by the demand curve and the  
14 amount they actually pay) and supplier surplus (the difference between the  
15 amount that suppliers are actually paid and the amount that they would have been  
16 willing to accept) minus deadweight loss. With exclusively rationable  
17 (sometimes called divisible) offers and bids, the marginal offer can be partially  
18 cleared in order for supply to precisely meet demand, preventing any deadweight  
19 loss. Therefore, where all offers are rationable, social surplus is maximized when  
20 all supply to the left of the intersection with demand is cleared. However, non-  
21 rationable offers can prevent a clearing solution at the precise intersection of  
22 supply and demand, creating a tradeoff between the deadweight loss associated

1 with clearing less supply or more supply than demanded at the marginal offer  
2 price.

3 Under Section III.13.2.7.4 of the Tariff, where non-rationable offers prohibit the  
4 descending clock auction from clearing the precise amount of capacity demanded,  
5 the capacity clearing engine analyzes the aggregate supply curve to determine  
6 cleared capacity offers and Capacity Clearing Prices that maximize social surplus  
7 for the associated Capacity Commitment Period. With the sloped demand curve,  
8 the amount of capacity demanded is dependent on price. Therefore, the optimal  
9 set of cleared offers and bids that will maximize social surplus is determined in  
10 accordance with the demand curve's price and quantity coordinates. The capacity  
11 clearing engine seeks to analyze every possible combination of offers in the  
12 region of the supply curve that intersects with the demand curve in order to  
13 maximize social surplus.

14  
15 **Q: PLEASE EXPLAIN THE MECHANICS OF THE CAPACITY CLEARING**  
16 **ENGINE IN THE TENTH FCA**

17 **A:** As I mentioned previously, the auction was closed in the Rest-of-Pool and the  
18 SENE Capacity Zones by the withdrawal of an offer from new capacity. The  
19 offer was withdrawn at \$7.029/kW-month and was non-rationable. I will refer to  
20 this offer hereafter as "Offer Z" for ease of reference. At \$7.029/kW-month,  
21 system-wide total offers were deficient of system-wide demand. Offer Z was  
22 selected, along with other lower-priced offers, because although including Offer Z  
23 resulted in excess capacity, its contribution to consumer surplus exceeded the  
24 deadweight loss resulting from that excess capacity. Offer Z was the highest-

1 priced cleared offer, therefore it set the Capacity Clearing Price in both the Rest-  
2 of-Pool and SENE Capacity Zones at \$7.030/kW-month. In this instance, the  
3 combination of offers selected by the capacity clearing engine excluded a set of  
4 smaller offers at prices below the Capacity Clearing Price. These excluded offers  
5 were not cleared because the solution's social surplus would not have been  
6 maximized had any combination of them been cleared. While these offers were  
7 less expensive and intuitively would have cleared, their contribution to social  
8 surplus was less than the reduction in social surplus caused by the incremental  
9 excess that would have resulted had they been purchased. After excluding these  
10 inframarginal offers, cleared supply exceeded demand at the Capacity Clearing  
11 Price of \$7.030/kW-month by 129.993 MW. Given all submitted offers, the  
12 system-wide sloped demand curve, and binding Capacity Transfer Limits on  
13 external interfaces, the set of selected offers provided the greatest social surplus  
14 of any combination of offers analyzed by the capacity clearing engine.

15  
16 **Q: WHY WERE THE PRICES THE SAME FOR THE SENE AND REST-OF-  
17 POOL CAPACITY ZONES?**

18 **A:** Although the SENE Capacity Zone was modeled as an import-constrained zone,  
19 there were sufficient resources to meet the zone's Local Sourcing Requirement  
20 ("LSR"). The LSR is the minimum amount of capacity that must be electrically  
21 located within the zone. For the tenth FCA, the LSR for the SENE Capacity Zone  
22 was 10,028 MW. The Capacity Clearing Price in the SENE Capacity Zone is the

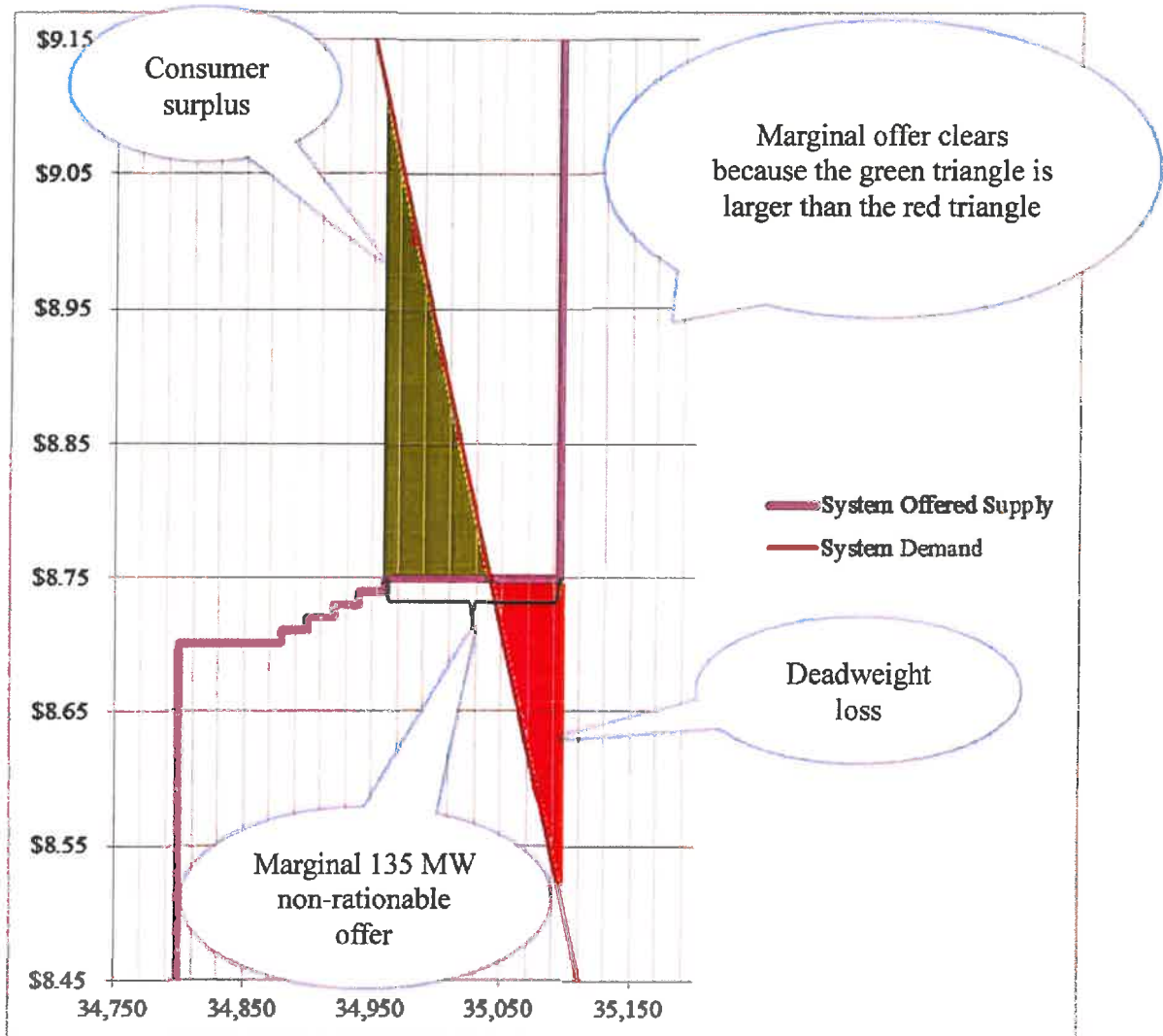
1 same as that in the Rest-of-Pool Capacity Zone because the LSR in the SENE  
2 Capacity Zone was not binding at any price above \$7.030/kW-month.

3

4 **Q: CAN YOU PROVIDE A GRAPH DEPICTING THE INTERSECTION OF**  
5 **THE SYSTEM-WIDE SLOPED DEMAND CURVE AND A NON-**  
6 **RATIONABLE OFFER IN A SAMPLE AGGREGATE SUPPLY CURVE?**

7 A: Yes. This simple example with six offers illustrates a case when a non-rationable  
8 offer causes the auction to bind and will also be selected to clear because it serves  
9 to maximize social surplus, which can be seen by comparing the larger area of the  
10 green triangle (consumer surplus) to the smaller area of the red triangle  
11 (deadweight loss). In this example, there are no other offers at a higher price that  
12 could be used to more precisely meet demand and provide greater social surplus.

1



2

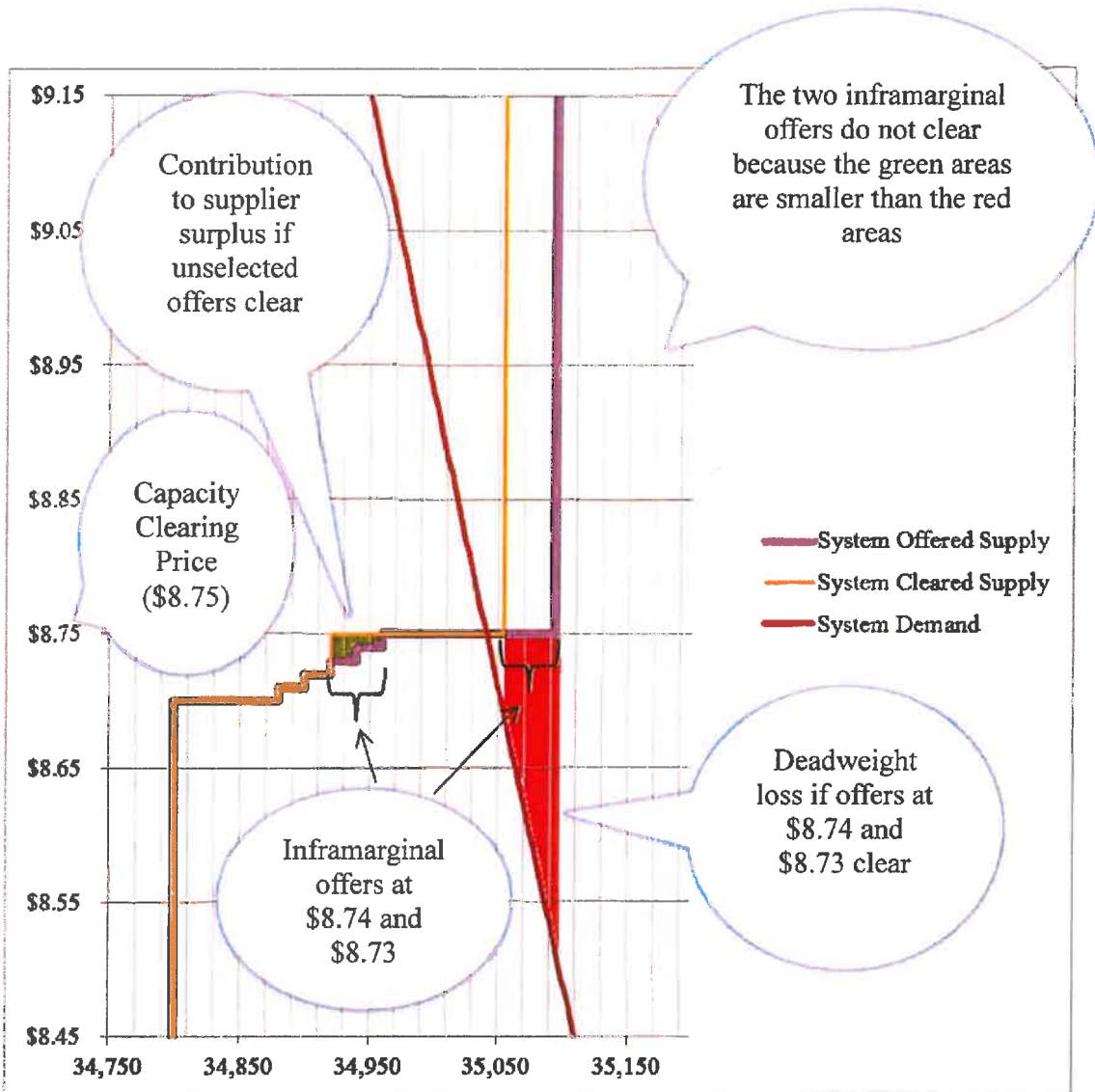
3

4 **Q: CONTINUING WITH THE SAME EXAMPLE, CAN YOU PROVIDE A**  
5 **GRAPH DEPICTING THE INTERSECTION OF THE SYSTEM-WIDE**  
6 **SLOPED DEMAND CURVE AND THE SAMPLE AGGREGATE SUPPLY**  
7 **CURVE AFTER APPLICATION OF THE CAPACITY CLEARING**  
8 **ENGINE?**

9 **A:** Yes. The marginal offer at \$8.75 clears, setting the Capacity Clearing Price. Two  
10 inframarginal offers do not clear, which include a 20 MW offer at \$8.74/kW-  
11 month and another 20 MW offer at \$8.73/kW-month. Clearing these

1        inframarginal offers would have decreased social surplus, which can be seen by  
2        comparing the smaller green areas (supplier surplus that the offers would have  
3        created) to the larger red areas (deadweight loss that the offers would have  
4        imposed).

5



6

7

8 **Q:    WHAT WERE THE PRICES ON THE EXTERNAL INTERFACES?**



1 A: Imports over the Phase I/II HQ Excess external interface, totaling 166 MW, and  
2 imports over the Hydro-Quebec Highgate external interface, totaling 58 MW, will  
3 receive \$7.030/kW-month. Imports over the New York AC Ties external  
4 interface, totaling 1,044.8 MW, will receive \$6.260/kW-month. Imports over the  
5 New Brunswick external interface, totaling 181 MW, will receive \$4.00/kW-  
6 month.

7

8 **Q: WHY WAS THE CAPACITY CLEARING PRICE FOR SOME OF THE**  
9 **EXTERNAL INTERFACES LOWER THAN THE OTHER CAPACITY**  
10 **CLEARING PRICES?**

11 A: The associated Capacity Zone for all external interfaces modeled in FCA 10 was  
12 the Rest-of-Pool Capacity Zone. At the \$7.030kW-month Capacity Clearing  
13 Price for the Rest-of-Pool Capacity Zone, the New York AC Ties external  
14 interface and the New Brunswick external interface each had a greater amount of  
15 capacity offered than the interface's capacity transfer limit allowed. Accordingly,  
16 pursuant to Section III.13.2.3.3 (d) of the Tariff, these external interfaces were  
17 treated in the auction as if they comprised separately modeled export-constrained  
18 capacity zones. Therefore, separate Capacity Clearing Prices were determined for  
19 the New York AC Ties external interface and the New Brunswick external  
20 interface, with the latter having required a fifth round of bidding.

21

22 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

23 A: Yes.

1 I declare that the foregoing is true and correct.

2

3

4



5

Robert G. Ethier

6

7 February 26, 2016

## **Attachment D**

1 UNITED STATES OF AMERICA  
2 BEFORE THE  
3 FEDERAL ENERGY REGULATORY COMMISSION  
4

5 )  
6 ISO New England Inc. ) Docket No. ER16-\_\_\_-000  
7 )

8 TESTIMONY OF JEFFREY MCDONALD, PhD  
9

10 Q: PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.

11 A: My name is Jeffrey McDonald. I am Vice President of Market Monitoring within  
12 ISO New England Inc. (the "ISO"), where I perform the role of the Internal  
13 Market Monitor ("IMM"). My business address is One Sullivan Road, Holyoke,  
14 Massachusetts 01040.

15

16 Q: PLEASE DESCRIBE YOUR WORK EXPERIENCE AND EDUCATIONAL  
17 BACKGROUND.

18 A: I have a Bachelor of Science degree in Agriculture and Managerial Economics  
19 from the University of California, Davis ("UC Davis"); a Masters of Science  
20 degree in Natural Resource Economics from the University of Massachusetts-  
21 Amherst; and a Ph.D. degree in Agriculture and Natural Resource Economics  
22 from UC Davis. Before joining the ISO in April 2014, I worked at the California  
23 ISO as Manager of Market Analysis and Mitigation in the Market Monitoring  
24 Department. In the fourteen years I worked at the California ISO, I held positions  
25 of increasing responsibility within the Department of Market Monitoring.

1 Before the California ISO, I worked for the State of California as a Staff  
2 Economist in the Department of Industrial Relations and the Department of  
3 Transportation.

4  
5 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

6 A: The purpose of my testimony is to certify that all offers and bids in the tenth  
7 Forward Capacity Auction (“FCA”)<sup>1</sup> that were required by the applicable  
8 provisions of the Tariff to be reviewed by the IMM were in fact properly  
9 reviewed and whether the outcome of the tenth FCA was the result of a  
10 competitive auction. Section III.13.8.2 (b) of the Tariff requires that, after each  
11 FCA, documentation regarding the competitiveness of the FCA be filed with the  
12 Commission.

13  
14 **Q: WERE ALL DE-LIST BIDS FROM EXISTING RESOURCES AND  
15 OFFERS FROM NEW RESOURCES PROPERLY REVIEWED BY THE  
16 IMM AND QUALIFIED IN ACCORDANCE WITH SECTION III.13.1 OF  
17 THE TARIFF PRIOR TO THE TENTH FCA CONDUCTED ON  
18 FEBRUARY 8, 2016?**

19 A: Yes. Section III.13.1 of the Tariff sets forth the process for qualifying resources  
20 to participate in the FCA. Section III.13.1.2.3.2 of the Tariff requires that the  
21 IMM review each Static De-List Bid, Export De-List Bid and Permanent De-List  
22 Bid above \$5.50/kW-month to determine whether the bid is consistent with the  
23 resource’s net risk-adjusted going forward costs and opportunity costs.

---

<sup>1</sup> Capitalized terms used but not defined in this testimony have the meanings ascribed to them in the ISO New England Transmission, Markets and Services Tariff (the “Tariff”).

1           Additionally, pursuant to Section III.A.21.2 of the Tariff, the IMM reviews  
2           requests submitted by each New Capacity Resource to offer in the FCA below the  
3           Offer Review Trigger Price for the applicable resource type. If the IMM  
4           determines that the requested offer price is inconsistent with the IMM's capacity  
5           price estimate, then the resource's New Resource Offer Floor Price is set to a  
6           level that is consistent with the capacity price estimate, as determined by the  
7           IMM.

8  
9           As Vice President of Market Monitoring and IMM, I am responsible for  
10          overseeing the review of all of these bids and offers, and I certify that such review  
11          was performed in accordance with the provisions of Section III.13.1 of the Tariff.  
12          The IMM's determinations with respect to these bids and offers were filed with  
13          the Commission in Docket No. ER16-308-000, and were accepted by the  
14          Commission on January 21, 2016.<sup>2</sup>

15  
16       **Q:    WAS THE OUTCOME OF THE TENTH FCA CONDUCTED FOR THE**  
17       **2019-2020 CAPACITY COMMITMENT PERIOD THE RESULT OF A**  
18       **COMPETITIVE AUCTION?**

19       **A:**    Yes. The outcome of the tenth FCA was the result of a competitive auction.  
20          System-wide there were insufficient existing resources to meet the Installed  
21          Capacity Requirement. Therefore, all participants with existing resources were  
22          determined by the IMM to be pivotal suppliers. As a result, mitigation was  
23          imposed on submitted de-list bids, where necessary. In these cases, the

---

<sup>2</sup> *Order Accepting Informational Filing*, 154 FERC ¶ 61,041 (2016) ("Informational Filing Order").

1 competitive bid price determined through the IMM's review of the cost basis was  
2 used in the auction in place of the price submitted by the market participant. The  
3 IMM mitigation determinations were accepted by the Commission in the  
4 Informational Filing Order. Under the Tariff, new resources, with the exception  
5 of New Import Capacity Resources, can leave the auction at any price at or above  
6 their New Resource Offer Floor Price. However, sufficient new resources  
7 remained in the auction such that, with the IMM mitigation of existing resources  
8 and New Import Capacity Resources associated with pivotal suppliers, the  
9 outcome of the auction was competitive. I base this conclusion on the rigorous  
10 qualification requirements including application of mitigation rules and the  
11 volume of new resources that offered into the auction at prices materially below  
12 the auction starting price.

13  
14 **Q: WHAT ARE THE "RIGOROUS QUALIFICATION REQUIREMENTS" YOU**  
15 **REFERENCE IN THE PREVIOUS ANSWER?**

16 **A:** During qualification, the IMM review of de-list bids and new capacity offers that  
17 request to submit an offer below the relevant Offer Review Trigger Price ensures  
18 that bids and offers submitted during qualification are consistent with each  
19 resource's costs.

20


21 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

22 **A:** Yes.

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I declare that the foregoing is true and correct.



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Jeffery McDonald.

February 29, 2016



# **Attachment E**

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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

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**ISO New England Inc.**

)  
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**Docket No. ER16-\_\_\_-000**

**TESTIMONY OF LAWRENCE M. AUSUBEL**

**Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

A. My name is Lawrence M. Ausubel. I am the Chairman and Founder of Power Auctions LLC, the company that has helped to design, implement, and administer the Forward Capacity Auction (“FCA”) for ISO New England Inc. (the “ISO”). I am also the President of Market Design Inc. and a Professor of Economics at the University of Maryland. My business address is 3333 K St. NW Suite 425, Washington, DC 20007.

**Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.**

A. I have an A.B. in Mathematics from Princeton University, an M.S. in Mathematics from Stanford University, an M.L.S. in Legal Studies from Stanford University, and a Ph.D. in Economics from Stanford University. I am the Chairman of Power Auctions LLC, a provider of auction implementation services and software worldwide. I am also the President of Market Design Inc., an economics consultancy that offers services in the design of auction markets. In recent years, I have played a lead role in the design and implementation of:

1 electricity auctions in France, Germany, Spain, Belgium and the US; gas auctions  
2 in Germany, France, Hungary and Denmark; the world's first auction for  
3 greenhouse gas emission reductions in the UK; and a prototype airport slot  
4 auction in the US. I have advised the US Federal Communications Commission,  
5 Industry Canada and the Australian Communications and Media Authority on  
6 spectrum auctions. I have also advised BOEM (the US Bureau of Ocean Energy  
7 Management) and ICANN (the Internet Corporation for Assigned Names and  
8 Numbers) on auction design. I designed the 2005 Trinidad and Tobago GSM  
9 auction and served as its auction manager. I hold 22 U.S. patents related to  
10 auction technology and I have published numerous articles on auction design,  
11 bargaining, industrial organization and financial markets. My curriculum vitae,  
12 which includes a list of publications and other experience, is attached.

13  
14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 A. The purpose of this testimony is to certify that the recently concluded FCA was  
16 conducted in accordance with the relevant filed market rules. Section  
17 III.13.8.2(b) of the ISO New England Transmission, Markets and Services Tariff  
18 (the "Tariff") requires that after each FCA, documentation regarding the  
19 competitiveness of the FCA be filed with the Federal Energy Regulatory  
20 Commission ("Commission"). Section III.13.8.2(b) states that such  
21 documentation may include certification from the auctioneer that the FCA was  
22 conducted in accordance with the provisions of Section III.13 of the Tariff.  
23 Section III.13.2 of the Tariff provides the rules relating to the mechanics of the

1 FCA. My testimony certifies that the FCA was conducted in accordance with  
2 Section III.13.2.

3  
4 **Q. PLEASE DESCRIBE POWER AUCTIONS LLC**

5 A. Power Auctions LLC designs, implements and conducts high-stakes electronic  
6 auctions utilizing proprietary software, processes, and other intellectual property.  
7 The PowerAuctions software platform designed by Power Auctions LLC has been  
8 used to implement over 200 auctions worldwide in the electricity, gas and  
9 resource sectors. In the electricity sector, the software platform was used to  
10 operate 42 quarterly EDF Generation Capacity Auctions in France. It was also  
11 used for the Endesa-Iberdola Virtual Power Plant Auctions in Spain, the  
12 Electrabel Virtual Power Plant Auctions in Belgium and the E.ON Virtual Power  
13 Plant Auction in Germany. Recently, our software platform has begun to be used  
14 to implement the UK's Capacity Market auctions. Further, Power Auctions LLC  
15 is part of the team that the Federal Communications Commission has assembled  
16 to design and implement incentive auctions for the United States, and is the prime  
17 contractor to the Governments of Australia and Canada for implementation of  
18 spectrum auctions.  
19 Power Auctions LLC worked with the ISO to design and implement (on the  
20 PowerAuctions platform) the previous FCAs held on February 4-6, 2008;  
21 December 8-10, 2008; October 5-6, 2009; August 2-3, 2010; June 6-7, 2011;  
22 April 2-3, 2012; February 4-5, 2013; February 3, 2014; and February 2, 2015.

23

1 Q. WHAT WAS POWER AUCTIONS LLC'S ROLE IN THE FORWARD  
2 CAPACITY AUCTION HELD ON FEBRUARY 8, 2016?

3 A. The ISO retained Power Auctions LLC as the independent auction manager  
4 ("Auction Manager") for the tenth FCA. As the Auction Manager, Power  
5 Auctions LLC worked with the ISO to design and implement the FCA in  
6 conformance with the Tariff. By design, the Auction Manager conducted the  
7 auction independently, with limited involvement by the ISO. The auction was  
8 implemented using the PowerAuctions software platform.

9  
10 Q. WAS THE FCA, HELD ON FEBRUARY 8, 2016 CONDUCTED IN  
11 ACCORDANCE WITH SECTION III.13.2 OF THE TARIFF?

12 A. Yes. In accordance with Section III.13.8.2(b) of the Tariff, I certify that, to the  
13 best of my knowledge, the FCA of February 8, 2016 was conducted in  
14 conformance with the provisions of Section III.13.2 of the Tariff.

15  
16 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17 A. Yes.

18  
19 I declare that the foregoing is true and correct.

20  
21 Executed on 2/17/2016

22  
23 

24 Lawrence M. Ausubel  
25

## Curriculum Vitae

LAWRENCE M. AUSUBEL

### Address

Department of Economics  
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College Park, MD 20742  
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[ausubel@econ.umd.edu](mailto:ausubel@econ.umd.edu)  
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Power Auctions LLC  
3333 K St. NW, Suite 425  
Washington, DC 20007-3591  
[ausubel@powerauctions.com](mailto:ausubel@powerauctions.com)  
[www.powerauctions.com](http://www.powerauctions.com)

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Washington, DC 20008

### Personal

Year of Birth: 1959  
Place of Birth: New York City

### Education

Ph.D. (1984) Stanford University, Economics  
M.L.S. (1984) Stanford Law School, Legal Studies  
M.S. (1982) Stanford University, Mathematics  
A.B. (1980) Princeton University, Mathematics

Honors: Fellow of the Econometric Society  
Phi Beta Kappa  
Sigma Xi  
Magna cum laude in mathematics  
Stanford University Economics Department, graduate fellowship, 1982  
Stanford Law School, fellowship in law and economics, 1983

### Fields of Concentration

Microeconomic Theory and Game Theory  
Auctions and Bargaining  
Market Design  
Credit Cards, Bankruptcy and Banking  
Industrial Organization  
Law and Economics

## **Professional Experience**

Professor of Economics, University of Maryland (August 1992 – present).

Chairman and Founder, Power Auctions LLC (2003 – present).

A technology provider of auction software, auction design and implementation services. The PowerAuctions™ software platform has been used in more than 200 high-stakes auctions, with transaction value in the tens of billions of dollars.

President, Market Design Inc. (2003 – present).

A consultancy of leading economists and game theorists (Peter Cramton, R. Preston McAfee, Paul Milgrom, Robert Wilson, et al) that works with governments and companies worldwide to design and implement state-of-the-art auctions and markets.

Assistant Professor of Managerial Economics and Decision Sciences, Kellogg School, Northwestern University (September 1984 – August 1992).

Visiting Assistant Professor, New York University (January 1990 – May 1990).

## **Recent Consulting Experience**

Provided expert bidding advice to bidders in more than a dozen large spectrum auctions, including Bharti Airtel in India's 900/1800 MHz auction, Orange in Slovakia's Multi-Band spectrum auction, Three (Hutchison) in the UK 4G auction, Eircom in Ireland's 800/900/1800 MHz auction, Aircel in India's 3G/BWA auctions, Spain's Telefónica in the UK, German, Italian and Austrian UMTS/3G spectrum auctions, Ericsson in the US PCS spectrum auctions, MTN in the Nigerian spectrum auctions, MCI in the US Direct Broadcast Satellite auction, US Airwaves in the US C-Block Auction, Mobile Media in the US Narrowband Auction, and other confidential clients.

Advisor to the US government (Federal Communications Commission) on the design and implementation of incentive auctions for spectrum, 2011 – present.

Advisor to the Canadian government (Industry Canada) on the design and implementation of the 700 MHz and 2.5 GHz spectrum auctions, 2010 – present.

Advisor to the Australian government (ACMA) on the design and implementation of the Australian Digital Dividend auction and future spectrum auctions, 2011 – present.

Provided auction design advice to the IDA Singapore on their Auction of Public Cellular Mobile Telecommunication Services Spectrum Rights, 2007 – 2008.

Design and implementation of the Trinidad and Tobago GSM auction, 2005.

Design and implementation of the UK Capacity Market auction (electricity, 2014 – present).

Design and implementation of auctions for offshore wind energy tracts for the Bureau of Ocean Energy Management (BOEM), US Department of Interior (2010 – present).

Design and implementation of the Forward Capacity Auction for ISO New England (electricity, 2007 – present).

Design and implementation of the quarterly Electricité de France generation capacity auctions (2001 – 2011) and Long-Term Contract auctions (2008 – 2009).

Design and implementation of the quarterly Spanish Virtual Power Plant (VPP) auctions (electricity, 2007 – 2009).

Design and implementation of the E.ON VPP auction in Germany (2007).

Design and implementation of the quarterly Electrabel Virtual Power Plant (VPP) auctions in Belgium (2003 – 2005).

Design and implementation of auctions for new gTLDs for ICANN (Internet Corporation for Assigned Names and Numbers (2008 – present).

Design and implementation of rough diamond auctions for Okavango Diamond Company, Botswana (2013 – present).

Design and implementation of rough diamond auctions for BHP Billiton/Dominion Diamonds (2007 – 2014).

Design and implementation of the annual E.ON Földgáz Trading gas release programme auction in Hungary (2006 – 2013).

Design and implementation of the annual Danish Oil and Natural Gas (DONG Energy) gas release programme auction (2006 – 2011).

Design and implementation of the annual E.ON Ruhrgas gas release programme auction in Germany (2003 – 2008, 2010).

Design and implementation of the Gaz de France gas storage auction (2006).

Design and implementation of the Gaz de France gas release programme auction (2004).

Design and implementation of the Total gas release programme auction (2004).

Design and implementation of the UK Emissions Trading Scheme auction to procure greenhouse gas emission reductions for the UK Government (2002).

Design and implementation of a demonstration auction of landing and takeoff slots for LaGuardia Airport, for the US Federal Aviation Administration (2005).



## Teaching

Econ 456	Law and Economics (Undergraduate; Maryland)
Econ 603	Microeconomic Analysis (Ph.D.; Maryland)
Econ 661	Industrial Organization (Ph.D.; Maryland)
Econ 704	Game Theory, Bargaining and Auctions (Ph.D.; Maryland)
Mngl Econ D30	Intermediate Microeconomics (M.B.A.; Northwestern)
Mngl Econ D45	Regulation and Deregulation (M.B.A.; Northwestern)

## Publications

- “A Practical Guide to the Combinatorial Clock Auction” (with Oleg V. Baranov), *Economic Journal*, forthcoming, 2016.
- “Demand Reduction and Inefficiency in Multi-Unit Auctions” (with Peter Cramton, Marek Pycia, Marzena J. Rostek and Marek Weretka), *Review of Economic Studies*, Vol. 81, No. 4, pp. 1366-1400, October 2014.
- “Sequential Kidney Exchange” (with Thayer Morrill), *American Economic Journal: Microeconomics*, Vol. 6, No. 3, pp. 265-85, August 2014.
- “Market Design and the Evolution of the Combinatorial Clock Auction” (with Oleg V. Baranov), *American Economic Review: Papers & Proceedings*, Vol. 104, No. 5, pp. 456-451, May 2014.
- “Common-Value Auctions with Liquidity Needs: An Experimental Test of a Troubled Assets Reverse Auction” (with Peter Cramton, Emel Filiz-Ozbay, Nathaniel Higgins, Erkut Ozbay and Andrew Stocking), Chapter 20 of *Handbook of Market Design* (Nir Vulkan, Alvin E. Roth, and Zvika Neeman, eds.), Oxford University Press, 2013.
- “Non-Judicial Debt Collection and the Consumer’s Choice among Repayment, Bankruptcy and Informal Bankruptcy” (with Amanda E. Dawsey and Richard M. Hynes), *American Bankruptcy Law Journal*, Vol. 87, pp. 1-26 [lead article], March 2013.
- “Virtual Power Plant Auctions” (with Peter Cramton), *Utilities Policy*, Vol. 18, No. 4, pp. 201-208, December 2010.
- “Using Forward Markets to Improve Electricity Market Design” (with Peter Cramton), *Utilities Policy*, Vol. 18, No. 4, pp. 195-200, December 2010.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” *American Economic Review*, Vol. 96, No. 3, pp. 602-629, June 2006.
- “An Efficient Ascending-Bid Auction for Multiple Objects,” *American Economic Review*, Vol. 94, No. 5, pp. 1452-1475, December 2004.

- “Dynamic Auctions in Procurement” (with Peter Cramton), Chapter 9 of *Handbook of Procurement* (N. Dimitri, G. Piga, and G. Spagnolo, eds.), pp. 220-245, Cambridge: Cambridge University Press, 2006.
- “The Lovely but Lonely Vickrey Auction” (with Paul Milgrom), Chapter 1 of *Combinatorial Auctions* (P. Cramton, Y. Shoham, and R. Steinberg, eds.), pp. 17-40, Cambridge: MIT Press, 2006.
- “Ascending Proxy Auctions” (with Paul Milgrom), Chapter 3 of *Combinatorial Auctions* (P. Cramton, Y. Shoham, and R. Steinberg, eds.), pp. 79-98, Cambridge: MIT Press, 2006.
- “The Clock-Proxy Auction: A Practical Combinatorial Auction Design” (with Peter Cramton and Paul Milgrom), Chapter 5 of *Combinatorial Auctions* (P. Cramton, Y. Shoham, and R. Steinberg, eds.), pp. 115-138, Cambridge: MIT Press, 2006.
- “Auctioning Many Divisible Goods” (with Peter C. Cramton), *Journal of the European Economics Association*, Vol. 2, Nos. 2-3, pp. 480-493, April-May 2004.
- “Vickrey Auctions with Reserve Pricing” (with Peter C. Cramton), *Economic Theory*, 23, pp. 493-505, April 2004. Reprinted in Charalambos Aliprantis, et al. (eds.), *Assets, Beliefs, and Equilibria in Economic Dynamics*, Berlin: Springer-Verlag, 355-368, 2003.
- “Auction Theory for the New Economy,” Chapter 6 of *New Economy Handbook* (D. Jones, ed.), San Diego: Academic Press, 2003.
- “Ascending Auctions with Package Bidding” (with Paul Milgrom), *Frontiers of Theoretical Economics*, Vol. 1, No. 1, Article 1, August 2002.  
<http://www.bepress.com/bejte/frontiers/vol1/iss1/art1>
- “Bargaining with Incomplete Information” (with Peter Cramton and Raymond Deneckere), Chapter 50 of *Handbook of Game Theory* (R. Aumann and S. Hart, eds.), Vol. 3, Amsterdam: Elsevier Science B.V., 2002.
- “Package Bidding: Vickrey vs. Ascending Auctions” (with Paul Milgrom), *Revue Economique*, Vol. 53, No. 3, pp. 391-402, May 2002.
- “Implications of Auction Theory for New Issues Markets,” *Brookings-Wharton Papers on Financial Services*, Vol. 5, pp. 313-343, 2002.
- “Synergies in Wireless Telephony: Evidence from the Broadband PCS Auctions” (with Peter Cramton, R. Preston McAfee, and John McMillan), *Journal of Economics and Management Strategy*, Vol. 6, No. 3, Fall 1997, pp. 497-527.
- “Credit Card Defaults, Credit Card Profits, and Bankruptcy,” *American Bankruptcy Law Journal*, Vol. 71, Spring 1997, pp. 249-270; recipient of the Editor's Prize for the best paper in the American Bankruptcy Law Journal, 1997.
- “Efficient Sequential Bargaining” (with R. Deneckere), *Review of Economic Studies*, Vol. 60, No. 2, April 1993, pp. 435-461.

- “A Generalized Theorem of the Maximum” (with R. Deneckere), *Economic Theory*, Vol. 3, No. 1, January 1993, pp. 99-107.
- “Durable Goods Monopoly with Incomplete Information” (with R. Deneckere), supercedes “Stationary Sequential Equilibria in Bargaining with Two-Sided Incomplete Information,” *Review of Economic Studies*, Vol. 59, No. 4, October 1992, pp. 795-812.
- “Bargaining and the Right to Remain Silent” (with R. Deneckere), *Econometrica*, Vol. 60, No. 3, May 1992, pp. 597-625.
- “The Failure of Competition in the Credit Card Market,” *American Economic Review*, Vol. 81, No. 1, March 1991, pp. 50-81; reprinted as Chapter 21 in *Advances in Behavioral Finance* (D. Thaler, ed.), Russell Sage Foundation, 1993.
- “Insider Trading in a Rational Expectations Economy,” *American Economic Review*, Vol. 80, No. 5, December 1990, pp. 1022-1041.
- “Partially-Revealing Rational Expectations Equilibrium in a Competitive Economy,” *Journal of Economic Theory*, Vol. 50, No. 1, February 1990, pp. 93-126.
- “A Direct Mechanism Characterization of Sequential Bargaining with One-Sided Incomplete Information” (with R. Deneckere), *Journal of Economic Theory*, Vol. 48, No. 1, June 1989, pp. 18-46; reprinted as Chapter 15 in *Bargaining with Incomplete Information* (P. Linhart, R. Radner, and M. Satterthwaite, eds.), Academic Press, 1992.
- “Reputation in Bargaining and Durable Goods Monopoly” (with R. Deneckere), *Econometrica*, Vol. 57, No. 3, May 1989, pp. 511-531; reprinted as Chapter 13 in *Bargaining with Incomplete Information* (P. Linhart, R. Radner, and M. Satterthwaite, eds.), Academic Press, 1992.
- “One is Almost Enough for Monopoly” (with R. Deneckere), *Rand Journal of Economics*, Vol. 18, No. 2, Summer 1987, pp. 255-274.

## **Patents**

- “System and Method for an Auction of Multiple Types of Items” (with Peter Cramton and Wynne P. Jones), U.S. Patent Number 8,762,222, issued June 24, 2014.
- “System and Method for the Efficient Clearing of Spectrum Encumbrances” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 8,744,924, issued June 3, 2014.
- “System and Method for a Dynamic Auction with Package Bidding” (with Paul Milgrom), U.S. Patent Number 8,566,211, issued October 22, 2013.
- “System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 8,447,662, issued May 21, 2013.

- “System and Method for a Hybrid Clock and Proxy Auction” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 8,335,738, issued December 18, 2012.
- “System and Method for a Hybrid Clock and Proxy Auction” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 8,224,743, issued July 17, 2012.
- “System and Method for the Efficient Clearing of Spectrum Encumbrances” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 8,145,555, issued March 27, 2012.
- “Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 8,065,224, issued November 22, 2011.
- “Ascending Bid Auction for Multiple Objects,” U.S. Patent Number 7,966,247, issued June 21, 2011.
- “System and Method for an Auction of Multiple Types of Items” (with Peter Cramton and Wynne P. Jones), U.S. Patent Number 7,899,734, issued March 1, 2011.
- “System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,870,050, issued January 11, 2011.
- “Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 7,774,264, issued August 10, 2010.
- “System and Method for a Hybrid Clock and Proxy Auction” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 7,729,975, issued June 1, 2010.
- “System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,467,111, issued December 16, 2008.
- “System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,343,342, issued March 11, 2008.
- “Ascending Bid Auction for Multiple Objects,” U.S. Patent Number 7,337,139, issued February 26, 2008.
- “Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 7,249,027, issued July 24, 2007.
- “System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,165,046, issued January 16, 2007.
- “System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,062,461, issued June 13, 2006.
- “System and Method for an Efficient Dynamic Auction for Multiple Objects,” U.S. Patent Number 6,026,383, issued February 15, 2000.

“Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 6,021,398, issued February 1, 2000.

“Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 5,905,975, issued May 18, 1999.

### **Book Reviews and Encyclopedia Entries**

“Auction Theory,” *New Palgrave Dictionary of Economics*, Second Edition, Steven N. Durlauf and Lawrence E. Blume, eds., London: Macmillan, 2008.

“Credit Cards,” *McGraw-Hill Encyclopedia of Economics*, McGraw-Hill, 1994.

“Book Review: The Credit Card Industry, by Lewis Mandell,” *Journal of Economic Literature*, Vol. 30, No. 3, September 1992, pp. 1517-18.

“Credit Cards,” *New Palgrave Dictionary of Money and Finance*, Stockton Press, 1992.

### **Working Papers**

“Efficient Procurement Auctions with Increasing Returns” (with Oleg V. Baranov, Christina Aperjis and Thayer Morrill), February 2016.

“The Combinatorial Clock Auction, Revealed Preference and Iterative Pricing” (with Oleg V. Baranov), February 2014.

“Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), working paper, University of Maryland, August 2010.

“Penalty Interest Rates, Universal Default, and the Common Pool Problem of Credit Card Debt” (with Oleg V. Baranov and Amanda E. Dawsey), mimeo, University of Maryland, June 2010.

“A Troubled Asset Reverse Auction” (with Peter Cramton), working paper, University of Maryland, October 2008.

“Time Inconsistency in the Credit Card Market” (with Haiyan Shui), mimeo, University of Maryland, January 2005.

“Informal Bankruptcy” (with Amanda E. Dawsey), mimeo, University of Maryland, April 2004.

“Adverse Selection in the Credit Card Market,” mimeo, University of Maryland, June 1999.

“The Credit Card Market, Revisited,” mimeo, University of Maryland, July 1995.

“Walrasian Tâtonnement for Discrete Goods,” mimeo, University of Maryland, July 2005.

- “Bidder Participation and Information in Currency Auctions” (with Rafael Romeu), Working Paper WP/05/157, International Monetary Fund, 2005.
- “A Mechanism Generalizing the Vickrey Auction,” mimeo, University of Maryland, September 1999.
- “The Ascending Auction Paradox” (with Jesse Schwartz), mimeo, University of Maryland, July 1999.
- “The Optimality of Being Efficient” (with Peter Cramton), mimeo, University of Maryland, June 1999.
- “Sequential Recontracting Under Incomplete Information” (with Arijit Sen), mimeo, University of Maryland, June 1995.
- “Separation and Delay in Bargaining” (with Raymond Deneckere), mimeo, University of Maryland, April 1994.
- “A Model of Managerial Discretion and Corporate Takeovers,” mimeo, University of Maryland, March 1993.
- “Rigidity and Asymmetric Adjustment of Bank Interest Rates,” mimeo, University of Maryland, August 1992.
- “Oligopoly When Market Share Matters,” mimeo, Stanford University, May 1984.
- “Partially-Revealing Equilibria,” Stanford University, Department of Economics, August 1984. Dissertation committee: Mordecai Kurz (principal advisor); Peter J. Hammond; Kenneth J. Arrow.

### Works in Progress

- “The Hungarian Auction” (with T. Morrill)
- “Bargaining and Forward Induction” (with R. Deneckere)

### Op-Eds

- “Making Sense of the Aggregator Bank” (with Peter Cramton), *Economists' Voice*, Vol. 6, Issue 3, Article 2, February 2009.
- “No Substitute for the ‘P’-Word in Financial Rescue” (with Peter Cramton), *Economists' Voice*, Vol. 6, Issue 2, Article 2, February 2009.
- “Auction Design Critical for Rescue Plan” (with Peter Cramton), *Economists' Voice*, Vol. 5, Issue 5, Article 5, September 2008.

## Research Grants

Principal Investigator, “Common-Value Auctions with Liquidity Needs” (with P. Cramton, E. Filiz-Ozbay and E. Ozbay), National Science Foundation Grant SES-09-24773, September 1, 2009 – August 31, 2013.

Principal Investigator, “Dynamic Matching Mechanisms” (with P. Cramton), National Science Foundation Grant SES-05-31254, August 15, 2005 – July 31, 2008.

Co-Principal Investigator, “Slot Auctions for U.S. Airports” (with M. Ball, P. Cramton and D. Lovell), Federal Aviation Administration, September 1, 2004 – August 31, 2005.

Co-Principal Investigator, “Rapid Response Electronic Markets for Time-Sensitive Goods” (with G. Anandalingam, P. Cramton, H. Lucas, M. Ball and V. Subrahmanian), National Science Foundation Grant IIS-02-05489, Aug 1, 2002 – July 31, 2005.

Principal Investigator, “Multiple Item Auctions” (with P. Cramton), National Science Foundation Grant SES-01-12906, July 15, 2001 – June 30, 2004.

Principal Investigator, “Auctions for Multiple Items” (with P. Cramton), National Science Foundation Grant SBR-97-31025, April 1, 1998 – March 31, 2001.

Co-Principal Investigator, “Auctions and Infrastructure Conference” (with P. Cramton), National Science Foundation, April 1, 1998 – March 31, 1999.

Principal Investigator, “Bargaining Power, Sequential Recontracting, and the Principal-Agent Problem” (with A. Sen), National Science Foundation Grant SBR-94-10545, October 15, 1994 – September 30, 1997.

Principal Investigator, “Insider Trading and Economic Efficiency,” The Lynde and Harry Bradley Foundation, May 15, 1989 – May 14, 1992.

Principal Investigator, “Bargaining with One- and Two-Sided Incomplete Information” (with R. Deneckere), National Science Foundation Grant SES-86-19012, June 1, 1987 – May 31, 1989.

Principal Investigator, “Information Transmission in Bargaining and Markets” (with R. Deneckere), National Science Foundation Grant IST-86-09129, July 1, 1986 – June 30, 1987.

## Conference Presentations

“On Generalizing the English Auction,” Econometric Society Winter Meetings, Chicago, January 1998.

“The Optimality of Being Efficient,” Maryland Auction Conference, Wye River, May 1998.

- “Adverse Selection in the Credit Card Market,” Western Finance Association, Monterey, June 1998.
- “The Optimality of Being Efficient,” Econometric Society Summer Meetings, Montreal, June 1998.
- “Bargaining and Forward Induction,” Northwestern Summer Microeconomics Conference, Evanston, IL, July 1998.
- “Predicting Personal Bankruptcies,” National Conference of Bankruptcy Judges, Dallas, October 1998.
- “Adverse Selection in the Credit Card Market,” NBER Behavioral Macroeconomics Conference, Boston, December 1998.
- “The Ascending Auction Paradox,” Econometric Society Summer Meetings, Madison, June 1999.
- “Adverse Selection in the Credit Card Market,” Econometric Society Summer Meetings, Madison, June 1999.
- “Predicting Personal Bankruptcies,” Meeting of the National Association of Chapter Thirteen Trustees, New York, July 1999.
- “The Ascending Auction Paradox,” Southeast Economic Theory Conference, Washington DC, November 1999.
- “Adverse Selection in the Credit Card Market,” Utah Winter Finance Conference, Salt Lake City, February 2000.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” Conference on Auctions and Market Structure, Heidelberg, Germany, July 2000.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” Conference on Multiunit Auctions, Stony Brook, NY, July 2000.
- “A Mechanism Generalizing the Vickrey Auction,” Econometric Society World Congress, Seattle, August 2000.
- “Auctions for Financial E-Commerce,” New York Federal Reserve Bank Conference on Financial E-Commerce, New York, February 2001.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” NSF General Equilibrium Conference, Providence, RI, April 2001.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” NSF/NBER Decentralization Conference, Evanston, IL, April 2001.



- “Informal Bankruptcy,” Association of American Law Schools Workshop on Bankruptcy, St. Louis, MO, May 2001.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” Econometric Society Summer Meetings, College Park, MD, June 2001.
- “Ascending Auctions with Package Bidding,” FCC, SIEPR and NSF Conference on Combinatorial Auctions, Wye River, MD, October 2001.
- “The Electricité de France Generation Capacity Auctions,” CORE-ECARES-LEA Workshop on Auctions, Brussels, Belgium, November 2001.
- “Informal Bankruptcy,” Utah Winter Finance Conference, Salt Lake City, February 2002.
- “Defictionalizing the Walrasian Auctioneer,” Conference on Market Design in Honor of Robert Wilson, Stanford, CA, May 2002.
- “Adverse Selection in the Credit Card Market,” Conference on the Economics of Payment Networks, Toulouse, France, June 2002.
- “Ascending Auctions with Package Bidding,” Econometric Society Summer Meetings, Los Angeles, June 2002.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” Conference in Honor of Mordecai Kurz, Stanford, CA, August 2002.
- “Adverse Selection in the Credit Card Market,” Conference on Credit, Trust and Calculation, San Diego, November 2002.
- “Package Bidding for Spectrum Auctions,” American Economic Association Meetings, Washington, DC, January 2003.
- “Auctioning Many Divisible Goods,” invited session, European Economic Association Meetings, Stockholm, August 2003.
- “Spectrum Auctions with Package Bidding,” TPRC Research Conference on Communication, Information and Internet Policy, Arlington, VA, September 2003.
- “Defictionalizing the Walrasian Auctioneer,” invited lecture, Conference on Auctions and Market Design: Theory, Evidence and Applications, Fondazione Eni Enrico Mattei, Milan, September 2003.
- “Clock Auctions, Proxy Auctions, and Possible Hybrids,” Workshop on Auction Theory and Practice, Pittsburgh, PA, November 2003.
- “Clock Auctions, Proxy Auctions, and Possible Hybrids,” FCC Combinatorial Bidding Conference, Wye River, MD, November 2003.
- “Time Inconsistency in the Credit Card Market,” Utah Winter Finance Conference, Salt Lake

City, February 2004.

“The Clock-Proxy Auction: A Practical Combinatorial Auction Design,” Conference on Auctions and Market Design: Theory, Evidence and Applications, Consip, Rome, Italy, September 2004.

“Bidder Participation and Information in Currency Auctions,” Conference on Auctions and Market Design: Theory, Evidence and Applications, Consip, Rome, Italy, September 2004.

“The Clock-Proxy Auction: A Practical Combinatorial Auction Design,” Market Design Conference, Stanford University, December 2004.

“Dynamic Matching Mechanisms,” Econometric Society World Congress, London, August 2005.

“The Clock-Proxy Auction, with Recent Applications,” SISL Workshop, Caltech, October 2005.

“Dynamic Matching Mechanisms,” Conference on Matching and Two-Sided Markets, University of Bonn, May 2006.

“The Hungarian Auction,” DIMACS Workshop on Auctions with Transaction Costs, Rutgers University, March 2007.

“The Hungarian Auction,” PSE Lecture at the Paris School of Economics, June 2007.

“Time Inconsistency in the Credit Card Market,” John M. Olin Conference on Law and Economics of Consumer Credit, University of Virginia, February 2008.

“The Hungarian Auction,” 6th Annual International Industrial Organization Conference, Arlington, VA, May 2008.

“The Hungarian Auction,” Frontiers of Microeconomic Theory and Policy, Symposium in Honour of Ray Rees, University of Munich, July 2008.

“Common-Value Auctions with Liquidity Needs: An Experimental Test of a Troubled Assets Reverse Auction,” 2009 CAPCP Conference on Auctions and Procurement, Penn State University, March 2009.

“Market Design for Troubled Assets,” NBER Workshop on Market Design, Cambridge, MA, May 2009.

“Market Design for Troubled Assets,” Madrid Summer Workshop on Economic Theory, Universidad Carlos III de Madrid, June 2009.

“Virtual Power Plant Auctions,” (with Peter Cramton), Workshop: Designing Electricity Auctions, Research Institute of Industrial Economics, Stockholm, Sweden, September 2009.

- “Using Forward Markets to Improve Electricity Market Design,” (with Peter Cramton), Workshop: Designing Electricity Auctions, Research Institute of Industrial Economics, Stockholm, Sweden, September 2009.
- “Virtual Power Plant Auctions,” (with Peter Cramton), Market Design 2009 Conference, Stockholm, Sweden, September 2009.
- “Using Forward Markets to Improve Electricity Market Design,” (with Peter Cramton), Market Design 2009 Conference, Stockholm, Sweden, September 2009.
- “Auctions with Multiple Objects,” 2009 Erwin Plein Nemmers Prize in Economics, Conference in Honor of Paul Milgrom, Northwestern University, November 2009.
- “Penalty Interest Rates, Universal Default, and the Common Pool Problem of Credit Card Debt” (with Oleg V. Baranov and Amanda E. Dawsey), Credit, Default and Bankruptcy Conference, University of California - Santa Barbara, June 2010.
- “Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), World Congress of the Econometric Society, Shanghai, China, August 2010.
- “Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), NBER Workshop on Market Design, Cambridge, MA, October 2010.
- “Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), NSF/CEME Decentralization Conference, Ohio State University, April 2011
- “Penalty Interest Rates, Universal Default, and the Common Pool Problem of Credit Card Debt” (with Oleg V. Baranov and Amanda E. Dawsey), Centre for Financial Analysis & Policy Conference on Consumer Credit and Bankruptcy, University of Cambridge, UK, April 2011.
- “Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), Center for the Study of Auctions, Procurements and Competition Policy Conference, Penn State University, April 2011.
- “Design Issues for Combinatorial Clock Auctions” (with Oleg V. Baranov), Annual Meeting of the Institute for Operations Research and the Management Sciences (INFORMS), Phoenix AZ, October 2012.
- “An Enhanced Combinatorial Clock Auction” (with Oleg V. Baranov), SIEPR Conference on the FCC Incentive Auctions, Stanford University, February 2013.
- “Enhancing the Combinatorial Clock Auction” (with Oleg V. Baranov), Ofcom Conference, Combinatorial Auctions for Spectrum, London School of Economics, September 2013.
- “The Combinatorial Clock Auction, Revealed Preference and Iterative Pricing” (with Oleg V. Baranov), NBER Workshop on Market Design, Stanford University, October 2013.

“Market Design and the Evolution of the Combinatorial Clock Auction” (with Oleg V. Baranov), invited session in honor of the Nobel Prize in Economics awarded to Market Design, American Economic Association meetings, Philadelphia, January 2014.

“Revealed Preference in Bidding: Empirical Evidence from Recent Spectrum Auctions” (with Oleg V. Baranov), NBER Market Design Conference, Palo Alto, CA, June 2014.

“Enhancing the Combinatorial Clock Auction” (with Oleg V. Baranov), Industry Canada Retrospective on the Canadian 700 MHz Spectrum Auction, Ottawa, Canada, November 2014.

“Efficient Procurement Auctions with Increasing Returns” (with Oleg V. Baranov, Christina Aperjis and Thayer Morrill), Annual Meeting of the Institute for Operations Research and the Management Sciences (INFORMS), Philadelphia PA, November 2015.

### **Professional Service**

Member of working group for the design and implementation of incentive auctions for the US Federal Communications Commission, 2011–present.

Advisor to Industry Canada and the Australian Communications and Media Authority for the design and implementation of 700 MHz and 2.5 GHz spectrum auctions, 2011–present.

Congressional Briefing on “How Fundamental Economic Research Improves People’s Lives,” Rayburn House Office Building, March 2010.

Testified before the Committee on Banking, Housing and Urban Affairs of the US Senate, Hearing on “Modernizing Consumer Protection in the Financial Regulatory System: Strengthening Credit Card Protections,” February 12, 2009.

Testified before the Subcommittee on Financial Institutions and Consumer Credit of the US House of Representatives, Hearing on “The Credit Cardholders’ Bill of Rights: Providing New Protections for Consumers,” March 13, 2008.

Member, National Science Foundation Economics Panel, 2004–2005.

Associate Editor, *Berkeley Electronic Journals of Theoretical Economics*, 2004–present.

Guest Associate Editor, *Management Science*, issue on Electronic Auctions, 2003.

Program Chair of the 2001 North American Summer Meeting of the Econometric Society (with Peter Cramton), University of Maryland, June 21–24, 2001.

Program Committee of the North American Summer Meeting of the Econometric Society, UCLA, June 2002, and University of Pennsylvania, June 1991.

Organized Maryland Auction Conference (with Peter Cramton), Wye River Conference Center, May 1998, sponsored by the National Science Foundation, the World Bank, and the University of Maryland.

Spoke at a Forum on Bankruptcy of the Financial Services Committee of the United States House of Representatives, February 28, 2001.

Testified before the Subcommittee on Commercial and Administrative Law of the United States House of Representatives, Hearing on the Consumer Bankruptcy Issues in the Bankruptcy Reform Act of 1998, March 10, 1998.

Testified before the Subcommittee on Financial Institutions and Regulatory Relief of the United States Senate, Hearing on Bankruptcy Reform, February 11, 1998.

Testified before the National Bankruptcy Review Commission, January 1997.

Referee for: *American Economic Review*, *Econometrica*, *European Economic Review*, *Games and Economic Behavior*, *International Journal of Game Theory*, *International Journal of Industrial Organization*, *Journal of Banking and Finance*, *Journal of Business*, *Journal of Economic Theory*, *Journal of Financial Intermediation*, *Journal of Political Economy*, *Quarterly Journal of Economics*, *Rand Journal of Economics*, *Review of Economic Studies*, and the National Science Foundation.

### **Professional Organizations**

American Economic Association  
Econometric Society

# **Attachment F**

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# **EXHIBIT**

## **F**

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Friday, January 08, 2016 1:38 PM ET [Extra](#)

# Pilgrim retirement seen driving up New England capacity prices by 15% or more

Article

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By [Peter Marin](#)

Driven by the retirement of a large nuclear plant in Massachusetts, capacity prices could rise 15% year on year in New England's next Forward Capacity Auction scheduled for February, according to analyst with UBS Securities LLC.

The analysts led by Julien Dumoulin-Smith are projecting a clearing price of about \$11/kW-month in next month's annual auction, up from the \$9.55/kW-month price seen in last year's auction.

[ISO New England Inc.](#) holds forward capacity auction each year to procure sufficient capacity three years in advance. The next auction, Forward Capacity Auction 10, will cover the delivery period of June 1, 2019, through May 31, 2020.

"The higher result is primarily driven by the retirement of [\[Entergy Corp.\]](#)'s 680-MW pilgrim, which we assume will be replaced with a new asset requiring \$11/kW-mo to be economic; without any new entry, we foresee an even higher outcome of \$13/kW mo," Dumoulin-Smith wrote in a Dec. 31, 2015, note to clients, "Picking a Price for the New England Auction."

"Bottom line, the auction results appear likely to be driven by a (or multiple) new unit(s), with the clearing price between \$10-13/kW-mo, reflecting higher credit spreads than [\[Competitive Power Ventures\]'s](#) new unit in the last auction, which set prices at 9.55/kW-mo," he said.

UBS projects the [retirement](#) of the Pilgrim nuclear plant will be the big driving factor, "enabling a 'new' asset once more to set prices." However few other retirements are anticipated due to high regional prices for capacity and limited new incremental environmental regulations.

"We suspect new entrants will reflect the higher cost of debt into their bids to clear new capacity," the analyst wrote. "The sensitivity to new entrant economics is especially acute in the relatively small (e.g., vs. PJM) New England capacity market as we estimate a single marginal unit could swing prices by as much as \$3/kW-mo."

UBS does not expect other regions will break out following the collapse of the parameters for NEMA and SEMA into a single zone. "We expect prices to clear as one large zone following the collapse into the 'Southeast New England' zone for the next FCA auction," Dumoulin-Smith wrote.

In [last year's auction](#), the Connecticut, Northeast Massachusetts/Boston and Rest-of-Pool zones cleared at \$9.55/kW-month. However for the new SEMA/RI zone, administrative pricing rules were triggered because of inadequate supply, which resulted in a \$17.73/kW-month clearing price for new resources and a \$11.08/kW-month clearing price for existing resources for the 2018-2019 delivery period.

The year prior, in [FCA 8](#) for delivery years 2017-2018, new resources saw a clearing price of \$15.00/kW-month while existing resources cleared at \$7.025/kW-month. However, Northeast Massachusetts/Boston, or NEMA/Boston, saw both new and existing resources clear at \$15.00/kW-month based on administrative pricing rules.

UBS also highlighted that, in contrast to prior auctions, the latest tweaks to the auction rules effectively increase the 'floor' price of the auction mechanism, "minimizing downside risk to the 'dynamic de-list' price of \$5.50/kW-mo."

"While we had previously seen risk of prices dropping further, the YoY change in the dynamic de-list provides substantially greater support on prices to the downside," Dumoulin-Smith wrote.

Looking ahead, however, New England capacity prices could be topping out. "[W]e don't see any further obvious candidates to drive retirements, particularly with capacity compensation at this higher level across the entire ISO-NE footprint," he wrote.

For more detailed capacity market data, visit [SNL Energy's Capacity Market Pages](#).

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Monday, February 08, 2016 3:34 PM ET Extra

## Tight supply-demand balance should mean strong New England capacity prices

By Peter Marrin

A tight supply-demand balance should lead to another year of strong capacity prices in ISO New England Inc.'s annual Forward Capacity Auction, which began Feb. 8, analysts with Morgan Stanley Research said.

ISO-New England holds a forward capacity auction each year to procure sufficient capacity three years in advance. FCA No. 10 will cover the delivery period of June 1, 2019, through May 31, 2020.

"The New England market is going into this capacity auction with ~680 MW of incremental generation retirements, resulting in a continuation of the tight market conditions seen last year. As a result, we expect new entry to once again set prices," analyst Stephen Byrd wrote in a Feb. 8 note.

The analysts see construction of new gas plants as economic between \$8/kW-month and \$11.50/kW-month in this year's auction. They see Rest-of-Pool, Connecticut, and NEMA-Boston to clear at \$9/kW-month to \$11/kW-month, "near the midpoint of our modeling range and bounded on the low end by the Minimum Offer Price for new combined cycle gas generation."

These prices compare to an existing resource clearing price of \$9.55/kW-month for Rest-of-Pool, Connecticut and NEMA-Boston, and \$11.08/kW-month for SEMA-RI in last year's auction.

The analysts do not expect the new Southeast New England zone, or SENE zone, to price separate from Rest-of-Pool, as it has adequate existing supply. The SENE zone combines SEMA-RI and NEMA-Boston. In last year's auction, SEMA-RI, which is a part of the new SENE zone, price separated at \$11.08/kW-month.

The SENE zone has excess local capacity, with the local sourcing requirement, or LSR, at 10,028 MW versus 10,388 MW of existing resources. However, the analysts highlighted that 1,133 MW of the existing resources are demand response, so a decrease in participation levels has the potential to trigger a shortfall, and thus administrative pricing rules. Administrative pricing would result in existing resources being paid the greater of \$10.81/kW-month or the Rest-of-Pool price.

Morgan Stanley points to the same tight supply-demand fundamentals seen last year driving prices in this year's auction. The net installed capacity requirement for the 2019-2020 period is 34,151 MW. After adjusting for retirements, and assuming that imports remain flat year over year and all existing demand response clears, Morgan Stanley estimate there is about 34,282 MW of existing capacity, implying the market is close to shortfall conditions.

"If the ~34.3 GW of existing resources all cleared with no new entry, the Rest-of-Pool clearing price would be \$12.05/kW-month based on the demand curve parameters. However, given that new entry is economic at prices below this level, we expect new gas plant economics to once again be the primary driver of clearing prices," Byrd wrote.

The analysts noted that Invenenergy LLC's proposed 900 MW combined cycle gas plant is a risk to prices.

"While the project does not yet have all the necessary siting approvals, if Invenenergy were to clear this project in FCA 10 it would drive prices down to ~\$8.25/kW, assuming no other new projects clear. However, an offer at this level would need to be pre-approved by the ISO, as it falls below the minimum offer price for a new combined cycle plant," Byrd wrote.

ISO New England will likely post the auction's final results by Feb. 12, but the results could come sooner depending on the duration of the auction.

*For more detailed capacity market data, visit [SNL Energy's Capacity Market Pages](#).*

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# **EXHIBIT**

# **G**



# EXHIBIT

## H

(a) **Implement voltage reduction.** The MW value of the load relief shall be equal to the percentage load reduction achieved in the most applicable voltage reduction tests multiplied by the forecasted seasonal peak loads.

(b) **Arrange for available Emergency energy from Market Participants or neighboring Control Areas.** These actions are included in the calculation through the use of tie benefits to meet system needs. The MW value of tie benefits is calculated in accordance with Section III.12.9.

(c) **Maintain an adequate amount of ten-minute synchronized reserves.** The amount of system reserves included in the determination of the Installed Capacity Requirement, Local Sourcing Requirements, Maximum Capacity Limits and Marginal Reliability Impact values shall be consistent with those needed for reliable system operations during Emergency Conditions. When modeling transmission constraints, the reserve requirement for a zone shall be the zone's pro rata share of the forecasted system peak load multiplied by the system reserves needed for reliable system operations during Emergency Conditions.

### **III.12.8. Load Modeling Assumptions.**

The ISO shall forecast load for the New England Control Area and for each Load Zone within the New England Control Area. The load forecasts shall be based on appropriate models and data inputs. Each year, the load forecasts and underlying methodologies, inputs and assumptions shall be reviewed with Governance Participants, the state utility regulatory agencies in New England and, as appropriate, other state agencies. If the load forecast shows a consistent bias over time, either high or low, the ISO shall propose adjustments to the load modeling methodology to the Governance Participants, the state utility regulatory agencies in New England and, as appropriate, other state agencies to eliminate the bias.

Demand Resources shall be reflected in the load forecast as specified below:

(a) Expected reductions from an installed or forecast Demand Resource not qualifying for or not participating in the Forward Capacity Auction shall be reflected as a reduction in the load forecast that will be used to determine the Installed Capacity Requirement, Local Sourcing Requirements, Maximum Capacity Limits and Marginal Reliability Impact values for the relevant Capacity Commitment Period. The expected reduction from these resources will be included in the load forecast to the extent that they meet the qualification process rules, including monitoring and verification plan and financial assurance requirements. If no qualification process rules are in place for the expected reductions from these resources, they shall not be included within the load forecast.

(b) Expected reductions from an installed or forecast Demand Resource that qualifies to participate in the Forward Capacity Market, participates but does not clear in the Forward Capacity Auction, or has cleared in a previous Forward Capacity Auction and is expected to continue in the Forward Capacity Market shall not be reflected as a reduction in the load forecast that will be used to determine the Installed Capacity Requirement, Local Sourcing Requirements, Maximum Capacity Limits and Marginal Reliability Impact values for the relevant Capacity Commitment Period.

(c) [Reserved.]

(d) Any realized Demand Resource reductions in the historical period that received Forward Capacity Market payments for these reductions, or Demand Resource reductions that are expected to receive Forward Capacity Market payments by participating in the upcoming Forward Capacity Auction or having cleared in a previous Forward Capacity Auction, shall be added back into the appropriate historical loads to ensure that such resources are not reflected as a reduction in the load forecast that will be used to determine the Installed Capacity Requirement, Local Sourcing Requirements, Maximum Capacity Limits and Marginal Reliability Impact values for the relevant Capacity Commitment Period.

### **III.12.9. Tie Benefits.**

The Installed Capacity Requirement, Local Sourcing Requirements, Maximum Capacity Limits and Marginal Reliability Impact values shall be calculated assuming appropriate tie benefits, if any, available from interconnections with neighboring Control Areas. Tie benefits shall be calculated only for interconnections (1) without Capacity Network Import Interconnection Service or Network Import Interconnection Service or (2) that have not requested Capacity Network Import Interconnection Service or Network Import Interconnection Service with directly interconnected neighboring Control Areas with which the ISO has in effect agreements providing for emergency support to New England, including but not limited to inter-Control Area coordination agreements, emergency aid agreements and the NPCC Regional Reliability Plan.

Tie benefits shall be calculated using a probabilistic multi-area reliability model, by comparing the LOLE for the New England system before and after interconnecting the system to the neighboring Control Areas. To quantify tie benefits, firm capacity equivalents shall be added until the LOLE of the isolated New England Control Area is equal to the LOLE of the interconnected New England Control Area.