



## **SUBMITTING PUBLIC COMMENTS TO FERC ABOUT ISO NEW ENGLAND**

If you are reading this, then clean air, water and land are important to you. You know we are in a climate crisis. You know it will take our collective power to positively influence decisions about our energy future.

**The Federal Energy Regulatory Commission (FERC) has the power to help us stop burning coal and start prioritizing renewable energy!** FERC oversees ISO New England, the power grid manager for all of New England. ISO-NE is in charge of selecting what power plants get forward capacity payments- ratepayer funded subsidies that pay generating stations simply for existing.

The Merrimack Generating Station and other fossil fuel plants in New England are currently being kept open by ISO-NE's forward capacity system. To date, ISO New England has only considered short-term reliability and economic cost when determining the winners of their forward capacity payments. This means that a sustainable, reliable energy source that is slightly more expensive in the short term will get beat out by a dirty old coal plant- even though coal is inefficient, uneconomical, and dangerous to the climate, community health, and long term grid reliability.

We are determined to change this system. **ISO New England needs to include environmental and social justice impacts in their forward capacity calculations.**

This is where you come in. Over the next few weeks, we'll be sending public comments to FERC's new Office of Public Participation, demanding that they require ISO-NE to change their forward capacity system. ISO New England is currently in a period of self study and is sensitive to FERC influence- their board was quite alarmed by the 100 comments we submitted to FERC last march. It's a great time to raise our collective voices and see how they react to even more comments!

### **WRITING YOUR COMMENT: TALKING POINTS**

**So, what should go in a public comment? It generally helps to have a short personal narrative, a key fact or two about the issue, a reminder about the context of climate change, and commonly-held values or motivations. *You can lean into what compels you the most!***

**Here are some talking points and a sample letter to help you get started:**

#### **Main Talking Points**

- Electricity ratepayers in New England share the burden of cost for aging dirty fossil fuel plants.
  - Overall, 10-20% of our electric bills go to subsidies that support fossil fuel generators.

- ISO-NE should be using *our* ratepayer dollars to invest in New England's collective future, not propping up dinosaur fossil fuel plants.
  - Example: We are still burning coal in New England for electricity, and we are *all* paying for it.
- The Merrimack Generating Station in Bow, NH was allocated \$24.34 million for our current year, and recently received [over 12 million in subsidies](#) for 2024-2025 through this last march's forward capacity auction.
- In one hour of operation, Merrimack Station releases greenhouse gas emissions [equal to 26 years in the life of an average American](#). Forward capacity payments to Merrimack Station keep coal on the grid "just in case it's necessary," enriching out-of-state private equity and investment firms at a huge cost to ratepayers. Coal is *not* necessary: we have enough electricity on the grid without it. [New England carries one of the highest reserve margins of any region in the country](#).
- Asking to intervene in ISO New England procedures
  - Their policy of valuing all electricity equally ("electron-neutrality") is irresponsible- the environment and climate justice should be just as important of a consideration as cost and reliability in their calculations
  - Environmental and social considerations should be added as part of the calculations for who receives forward capacity market payments. They are planning for 3 years ahead, which is already too far in the future to make significant changes that will have a positive impact
- We are in a Climate Crisis- there is little time to act to be able to mitigate the worst aspects of Climate Change
  - ISO-NE is tasked with maintaining the reliability of our electric grid, but fossil fuel infrastructure actually contributes to unreliability, since climate change brings more of the weather conditions that cause outages. For example, this [Connecticut case study](#) predicts power outage increases of 42%-64% by the end of the century due to increased heavy wind and precipitation.
  - ISO policies that subsidize the burning of fossil fuels are out of step with the values, goals, and legislation being written and passed in New England states. These states are working on climate solutions including increasing renewable portfolio standards that are increasing annually. ISO should be supporting and collaborating on these goals, not actively working against them with forward capacity payments.
  - Burning coal and other fossil fuels is a nonessential, immoral act that increases risk of respiratory illness and damages the planet.
  - The most vulnerable people in our communities, especially Indigenous, Black, and other people of color, are even more at risk from the pandemic, pollution, and economic injustice.
  - Without forward capacity payments to fossil fuel plants, money could be directed to projects that increase long-term reliability and increase, rather than destroy, climate resilience: efficiency, conservation, low-income assistance, and renewable energy.

**Sample Letter:**

Dear FERC commissioners:

I am writing today as a New England energy utility ratepayer, to ask for FERC to intervene with ISO New England, whose energy policy has been, to date, “every electron is neutral.” Besides the obvious scientific error in this statement, this kind of policy in a time of climate chaos is irresponsible and will result in disastrous consequences.

During the yearly auction of the Forward Capacity Market, energy producers compete based on reliability and cost. Moving forward, the forward capacity auction process must account for the environmental and social impact of competing energy sources. ISO-NE is tasked with maintaining the reliability of our electric grid, but fossil fuel infrastructure actually contributes to unreliability, since climate change brings more of the weather conditions that cause outages. For example, this [Connecticut case study](#) predicts power outage increases of 42%-64% by the end of the century due to increased heavy wind and precipitation.

Beyond reliability concerns, burning coal and other fossil fuels is a nonessential, immoral act that increases risk of respiratory illness and damages the planet. The most vulnerable people in our communities, especially Indigenous, Black, and other people of color, are even more at risk from the pandemic, pollution, and economic injustice.

There is no way that the aging Merrimack Generating Station in Bow, NH and other similar fossil fuel plants should be a serious contender against more sustainable, renewable alternatives, even if they are slightly more expensive. Without forward capacity payments to fossil fuel plants like the one in Bow, money could be directed to projects that increase long-term reliability and increase, rather than destroy, climate resilience: efficiency, conservation, low-income assistance, and renewable energy.

We understand that ISO New England is currently in a period of study about grid transition. We have sent a [letter to President and CEO Gordon van Welie](#) asking him to let us know when and how he plans to release the results and recommendations from these studies. He has not responded to us.

I am asking that FERC place pressure on ISO to change their algorithm to incentivize clean, sustainable, renewable energy. ISO New England is currently in a period of self-study, and FERC’s leadership on this issue during this critical time can help strengthen grid management for all New Englanders. And I am asking FERC to support public participation by requiring ISO New England make their plan for grid transition transparent to the community.

Thank you for your time and attention.

Sincerely,  
Your name

**How to Submit a Comment**

**[Instructional Video CLICK HERE](#)** (credit to Julie Macuga)

**Submitting comments to FERC is not the most straightforward process in the world, but we have step-by-step instructions:**

1. Go to <https://ferconline.ferc.gov/LogIn.aspx> and click on “Log In” on the left side of the screen.
2. You’ll need to create an account in order to submit comments; just follow along with the prompts from the website!
3. Once you are logged in, you will need to click on “E-Filing” on the left side of the screen
4. You should have a menu of options now! For the first option “How is your filing to be directed” click on “General”
5. For the second option “What kind of filing are you making?” click “Comment (on Filing, Environ. Report, or Tech Conf)”-- Then click the “Next” button.
6. The website should bring up a box for you to type in a docket number; enter: AD21-9 and click “search.”
7. This search will bring you to a page that lists the Office of Public Participation docket-- click the little blue “+” to the right under “select,” then click the “Next” button
8. Click on “Choose File” to submit a document containing your comment; Under “Description” you can put something like, “Comment asking for FERC to reevaluate policies regarding environmental concerns and ISO-NE.” Click “Upload.”
9. You should see your document listed below the “Description” box now under a tab labeled “Public.” Click “Next!”
10. On the next page, select “As an individual” then click “Next.”
11. Enter your email then click “add as signer” then click “Next”
12. On the Submission page click “Next”
13. On the final page, make sure everything you’re submitting is accurate, then hit “Submit!”
14. You’ll receive an email letting you know your comment was submitted!

If you are looking for even more in-depth instructions, find them here:

<https://www.ferc.gov/how-file-comment>