

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY**

**COMMENTS OF ISO NEW ENGLAND INC.
ON PUBLIC DRAFT OF THE NATIONAL TRANSMISSION NEEDS STUDY**

Pursuant to the “Notice of Availability of National Transmission Needs Study and Request for Comments” that the Grid Deployment Office of the U.S. Department of Energy (“DOE”) issued on March 6, 2023, ISO New England Inc. (“ISO-NE”) respectfully submit these limited comments on Section V.b of the Public Draft of the National Transmission Needs Study released on February 24, 2023 (“Draft Study”).

ISO-NE appreciates the addition of information on the ISO-NE Future Grid Reliability Study (“FGRS”), which was added since the consultation draft was published. However, ISO-NE notes that the first sentence of the fourth paragraph in Section V.b of the Draft Study regarding the FGRS may be misleading. To address this, ISO-NE suggests changing that sentence to clarify as follows:

ISO-NE (2022) similarly found in their Future Grid Reliability Scenarios (FGRS) that even in a mild weather year, such as the 2019 weather year used in the FGRS, weather events can pose significant challenges to maintaining electrical grid reliability under a high variable energy future.

ISO-NE believes these limited changes will help improve the study's accuracy, and respectfully requests that DOE incorporate them in the final study.

Respectfully submitted,

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