

Honorable Richard Glick
Chairman, Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Dear Chairman Glick and Members of the Federal Energy Regulatory Commission,

The undersigned legislators write to ask you to require ISO New England to eliminate the “minimum offer price rule” beginning with the next capacity auction to be held in February 2023. This capacity market rule forces consumers to shoulder the costs of unneeded capacity and undermines state efforts to transition away from fossil fuel resources that drive climate change and harm New Englanders’ health.

We understand that ISO New England has filed a proposal to eliminate this rule, but will delay that reform until two years from now (ER22-1528). ISO New England justifies this two-year delay in reforming this rule as important for reliability, but provides no evidence that forcing consumers to pay for unneeded capacity will help reliability when so much of that capacity cannot operate during the peak winter conditions due to limited gas supplies. In contrast, the resources supported by state climate policies, particularly offshore wind, perform well during cold snaps and alleviate the region’s over-dependence on just-in-time fuel deliveries.

Immediate reform is needed so that ISO New England’s capacity auctions better reflect the availability of resources supported by state policy and do not impose unnecessary costs on consumers in our states. The Federal Power Act reserves authority over generation to the states. As state legislators, we are fully committed to using that authority to advance the decarbonization of the electric system, which is essential to avoid further worsening of climate change. According to the most recent report released by the Intergovernmental Panel on Climate Change, greenhouse gas emissions must peak by 2025 to stave off even more dire climate impacts. We are doing our part to lead the fight against climate change, push for a just energy transition, and meet our nation’s commitments under the Paris Agreement. Reducing our dependence on fossil fuels is important not only to avoid further climate destabilization, but also to limit the impact of volatile foreign markets, protect communities against the air and water pollution associated with fossil fuel combustion, provide clean energy jobs in our state, and take advantage of the enormous cost savings that renewable energy can provide.

Yet our efforts to support the development of carbon-free generation sources have been stymied by the Commission’s approval of ISO New England capacity market rules that explicitly impede participation by state-supported resources, such as the “minimum offer price rule.” FERC should take this opportunity to reverse that overreach and restore the balance of state and federal authority envisioned by Congress.

Thank you for your attention and consideration of our input.

Sincerely,

Maine Representative Victoria Doudera (ME-94)	Rhode Island Senator Dawn Euer (RI-13)
Connecticut Representative Raghieb Allie-Brennan (CT-2)	Connecticut Representative Anthony Nolan (CT-39)
Connecticut Representative David Arconti (CT-109)	Connecticut Representative Christine Palm (CT-36)
Connecticut Representative Aimee Berger-Girvalo (CT-111)	Connecticut Representative Kevin Ryan (CT-139)
Connecticut Representative Matthew Blumenthal (CT-147)	Connecticut Representative Brian Smith (CT-48)
Connecticut Representative Julio Concepcion (CT-4)	Connecticut Representative Jonathan Steinberg (CT-136)
Connecticut Representative Jeffrey Currey (CT-11)	Connecticut Representative Gary Turco (CT-27)
Connecticut Representative Lucy Dathan (CT-142)	Connecticut Representative Quentin Williams (CT-100)
Connecticut Representative Jason Doucette (CT-13)	Connecticut Representative Michael Winkler (CT-56)
Connecticut Representative Kate Farrar (CT-20)	Connecticut Senator Matthew Lesser (CT-9)
Connecticut Representative Henry Genga (CT-10)	Maine Representative Poppy Arford (ME-49)
Connecticut Representative Jillian Gilchrest (CT-18)	Maine Representative Arthur Bell (ME-47)
Connecticut Representative Robert Godfrey (CT-110)	Maine Representative Seth Berry (ME-55)
Connecticut Representative Maria Horn (CT-64)	Maine Representative Lydia Blume (ME-3)
Connecticut Representative Anne Hughes (CT-135)	Maine Representative Michael Brennan (ME-36)
Connecticut Representative Susan Johnson (CT-49)	Maine Representative Lynn Copeland (ME-14)
Connecticut Representative Eleni Kavros DeGraw (CT-17)	Maine Representative Margaret Craven (ME-59)
Connecticut Representative Roland Lemar (CT-96)	Maine Representative Edward Crockett (ME-43)
Connecticut Representative David Michel (CT-146)	Maine Representative Scott Cuddy (ME-98)

Maine Representative Michelle Dunphy
(ME-122)

Maine Representative Ryan Fecteau
(ME-11)

Maine Representative Valli Geiger
(ME-93)

Maine Representative Traci Gere
(ME-9)

Maine Representative Lori Gramlich
(ME-13)

Maine Representative Nicole Grohoski
(ME-132)

Maine Representative Christopher Kessler
(ME-32)

Maine Representative Kristi Mathieson
(ME-1)

Maine Representative Ann Matlack
(ME-92)

Maine Representative David McCrea
(ME-148)

Maine Representative Joyce McCreight
(ME-51)

Maine Representative Laurie Osher
(ME-123)

Maine Representative Lois Reckitt
(ME-31)

Maine Representative Amy Roeder
(ME-125)

Maine Representative Melanie Sachs
(ME-48)

Maine Representative Denise Tepler
(ME-54)

Maine Representative Sophia Warren
(ME-29)

Maine Representative Lynne Williams
(ME-135)

Maine Representative Barbara Wood
(ME-38)

Maine Representative Stanley Zeigler
(ME-96)

Massachusetts Representative Natalie Blais
(MA-43)

Massachusetts Representative Michelle Ciccolo
(MA-74)

Massachusetts Representative Mindy Domb
(MA-59)

Massachusetts Representative Michelle DuBois
(MA-121)

Massachusetts Representative Carmine Gentile
(MA-72)

Massachusetts Representative Patricia Haddad
(MA-15)

Massachusetts Representative Paul Mark
(MA-8)

Massachusetts Representative Steven Owens
(MA-88)

Massachusetts Representative Lindsay Sabadosa
(MA-57)

Massachusetts Senator Anne Gobi
(MA-37)

Massachusetts Senator Michael Moore
(MA-38)

Massachusetts Senator Marc Pacheco
(MA-4)

New Hampshire Representative Susan Almy
(NH-45)

New Hampshire Representative Peter Bixby
(NH-152)

New Hampshire Representative Sherry Dutzy
(NH-75)

New Hampshire Senator Lucinda Rosenwald
(NH-13)

Rhode Island Representative Terri-Denise
Cortvriend (RI-72)

Rhode Island Representative Arthur Handy
(RI-18)

Maine Representative Samuel Zager
(ME-41)

Rhode Island Representative Michelle McGaw
(RI-71)

Rhode Island Senator Joshua Miller
(RI-28)

Vermont Representative Sarita Austin
(VT-40)

Vermont Representative Timothy Briglin
(VT-103)

Vermont Representative Jessica Brumsted
(VT-24)

Vermont Representative Sarah Copeland-Hanzas
(VT-58)

Vermont Representative Mari Cordes
(VT-4)

Vermont Representative James Masland
(VT-103)

Vermont Representative James McCullough
(VT-19)

Vermont Representative Logan Nicoll
(VT-76)

Vermont Representative Carol Ode
(VT-25)

Vermont Representative Avram Patt
(VT-56)

Vermont Representative Robin Scheu
(VT-1)

Vermont Representative Gabrielle Stebbins
(VT-29)

Vermont Representative Michael Yantachka
(VT-21)