

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

ISO New England, Inc.

Docket No. ER18-619-000

**ANSWER OF THE NATIONAL RURAL ELECTRIC
COOPERATIVE ASSOCIATION**

The National Rural Electric Cooperative Association (NRECA) submits this answer to the Motion To Intervene, Comments, and Request for Relief of Connecticut Municipal Electric Energy Cooperative, Massachusetts Municipal Wholesale Electric Company, New Hampshire Electric Cooperative, Inc., and Vermont Public Power Supply Authority (collectively, Public Systems), and to the Motion To Intervene and Comments of the American Public Power Association (APPA), both of which were filed in this proceeding on January 29, 2018.

In its motion to intervene filed on that same date, NRECA explained that it has interests in protecting the rights of its member cooperatives in New England to self-supply resources to meet the needs of their member-consumers and in minimizing the cost to their member-consumers resulting from the Forward Capacity Market administered by ISO New England, Inc.

Accordingly, NRECA supports the request of the Public Systems “that the Commission immediately open a Section 206 proceeding through which it may require the ISO to open the substitution auction to other State and consumer-preferred resources in the future.” Public Systems’ Mot. at 17. Similarly, NRECA supports APPA’s request

that if the Commission accepts the ISO's instant tariff changes, "the Commission should initiate a separate proceeding to address the limitation on public power resource choices in the ISO-NE administered market." APPA Mot. at 12. For the reasons set forth by the Public Systems and APPA, the Commission should use such a section 206 proceeding to investigate accommodating and removing barriers to the self-supply of resources by New England cooperatives and public power utilities alongside the ISO's centralized forward capacity auctions—allowing these wholesale customers to choose the resources they want to serve their customers' preferences and requirements without the risk of being forced to pay twice for such capacity.

Respectfully submitted,

/s/ Randolph Elliott

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February 12, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Arlington, Virginia, this 12th day of February 2018.

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