



14 November 2020

**Via Email**

NESCOE Managers: Kathryn Bailey, Philip Bartlett II, Katie S. Dykes, Ed McNamara, Matthew Nelson, June Tierney Nicholas Ucci, and Patrick Woodcock  
NESCOE staff: Heather Hunt, Executive Director

**Dear Ms. Bailey, Mr. Bartlett, Ms. Dykes, Mr. McNamara, Mr. Nelson, Mr. Ucci, Ms. Tierney, Mr. Woodcock, and Ms. Hunt,**

The undersigned organizations strongly urge the States and NESCOE to expand the public process to inform the development of NESCOE and the States' Vision Statement regarding reforming ISO-NE. The NESCOE vision letter said that the six New England States have "committed to engaging in a collaborative and open process, supported by NESCOE... to advance the... Vision statement" and wish to engage directly with "electricity market participants, affected stakeholders, and interested members of the public." We think the public is interested in ISO-NE reform and would support and enhance NESCOE's efforts. In order to see that engagement, we need open and accessible meetings.

Public comment and hearing processes are important vehicles for communities to make their concerns about or support for changing policies or practices known to decision-makers. The pandemic has drastically reduced communities' abilities to participate in public processes. Underserved communities that are being hardest hit by the virus also bear the brunt of environmental degradation. We must make an extra effort to make public processes accessible during this time so affected communities can meaningfully participate in decisions that impact their health and the environment.

We appreciate the preliminary steps that the States have taken with NESCOE to initiate a public process to inform the development of ISO-NE reforms. However, as organizations dedicated to protecting our environment and the health of residents and workers, we believe that the States and NESCOE must take the following proposed actions to ensure that the meetings are open and accessible:

1. **Hold evening meetings.** Public input means providing opportunities for residents who are not professionally engaged with ISO-NE matters to attend. Many residents have work obligations before 5pm, are tending to childcare and virtual learning, and cannot participate in daytime public meetings.
2. **Hold multiple region-specific meetings.** Holding meetings specific for sub-regions within New England will allow for concerned residents to be able to learn more about how specific changes will impact their community's concerns. Multiple shorter meetings will allow for participants to stay for both the overview and for the comment period and will help you achieve the broad public participation and engagement in this process that you want to see.
3. **Hold meetings that will allow for people to best be able to engage and contribute to the Vision.** Determine and meet accessibility needs for meeting participation including language interpretation, subtitles, and phone-in options. Ensure that you can hear from everyone who wants to share their comments, including by accepting written comments.
4. **Provide a clear followup plan for incorporating community feedback and reforming ISO-NE.** State managers, NESCOE officials, and other relevant state officials should be at the meetings to hear from constituents and to respond to questions and concerns. In addition to the dialogue at the online technical conferences, you should also create a public information portal with summaries of the materials from the hearings and written answers to questions posed during the meetings. The Vision Statement notes that States "intend to report to their respective Governors in the first quarter of 2021 on findings and recommendations for action steps to advance this Vision." We would like these state reports and the Governors' responses thereof to be made publicly available.

We are ready to answer questions you may have about these proposed actions and we formally request you keep us updated on your progress in considering these changes. You may direct your questions to Shaina Kasper by email at [shaina@communityactionworks.org](mailto:shaina@communityactionworks.org) or by phone at 802-922-4780

Sincerely,

350NH, NH  
Acadia Center, Regional  
Alternatives for Community & Environment (ACE), MA  
Berkshire Environmental Action Team (BEAT), MA  
Citizens Awareness Network, VT  
Community Action Works, Regional  
Conservation Law Foundation, Regional (NEPOOL member)  
Dancing Bee Gardens, VT  
Natural Resources Defense Council, Regional (NEPOOL member)  
Sierra Club, National  
South Coast Neighbors United, RI and MA  
Sustainable FERC Project, Regional  
Union of Concerned Scientists, MA (NEPOOL member)  
Vote Solar, Regional