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March 11, 2024

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Paul McGlynn  
Vice President, Planning  
PJM Interconnection  
2750 Monroe Boulevard  
Audubon, PA 19403

Dear Members of the Joint ISO/RTO Planning Committee (JIPC):

The Northeast States Collaborative on Interregional Transmission (Collaborative)<sup>1</sup> appreciates the support of the three eastern regional transmission organizations—ISO New England Inc. (ISO-NE), the New York Independent System Operator, Inc. (NYISO), and PJM Interconnection L.L.C. (PJM)—as the Collaborative explores ways to increase transfer capacity between our regions and accelerate offshore wind deployment. We write to respectfully request that you accelerate your investigation into the feasibility of raising the loss of source limit for all three markets to 2,000 MW. The current loss of source limit creates potential barriers to optimizing future offshore wind at a time when the Northeast states are pursuing transformative offshore wind projects critical to grid reliability.<sup>2</sup>

ISO-NE's request to the JIPC, which was submitted prior to the establishment of the Collaborative, notes that New England's current 1,200 MW loss of source limit could stymie optimal interconnection design for large scale renewables, such as offshore wind, in New England.<sup>3</sup> As the Collaborative has begun its work, it has become clear that the impact of the loss of source limit extends beyond New England: the JIPC should consider raising the limit in New York (currently 1,310 MW) and PJM (1,650 MW) as well.

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<sup>1</sup> States participating in the Collaborative are Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

<sup>2</sup> See ISO New England, *Operational Impact of Extreme Weather Events: Final Report on the Probabilistic Energy Adequacy Tool (PEAT) Framework and 2027/2032 Study Results* (December 11, 2023), [https://www.iso-ne.com/static-assets/documents/100006/operational\\_impact\\_of\\_extreme\\_weather\\_events\\_final\\_report.pdf](https://www.iso-ne.com/static-assets/documents/100006/operational_impact_of_extreme_weather_events_final_report.pdf) (e.g., at 233: "Timely additions of . . . offshore wind . . . are critical to mitigate energy shortfall risks that result from significant winter load growth and retirements").

<sup>3</sup> See March 27, 2023 Letter from ISO-NE to JIPC, available at [https://www.iso-ne.com/static-assets/documents/2023/03/jipc\\_loss\\_of\\_source\\_limit\\_final.pdf](https://www.iso-ne.com/static-assets/documents/2023/03/jipc_loss_of_source_limit_final.pdf).

The Collaborative is working in part to develop standardized equipment specifications that could be incorporated into individual state procurements or into coordinated regional transmission procurements. A higher loss of source limit is critical to determining what standards could be appropriate. For example, in practice, many offshore wind resources in Europe use 2,000 MW 525 kilovolt (kV) high voltage direct current (HVDC) cable systems to interconnect offshore wind.<sup>4</sup> However, the current loss of source limit may preclude this option. Increasing the loss of source limit could allow for larger single wind projects, fewer offshore transmission cables, and fewer onshore points of grid interconnection, thus reducing costs and siting impacts while improving economies of scale. These benefits would flow to electricity customers.<sup>5</sup>

Time is of the essence for increasing the loss of source limit. States are seeking to incorporate early standardization efforts into upcoming offshore wind solicitations. However, based on JIPC's response to ISO-NE, we understand that the necessary study would not be completed until early- to mid-2025, with further time required beyond mid-2025 to implement any upgrades identified in the study.<sup>6</sup> In practice, this means that solicitations for up to the next 2 years may have to assume that the existing low loss of source limits remain in place.

We request that ISO-NE, PJM, and NYISO make this effort a high priority and take all reasonable measures to accelerate the study timeline and, ultimately, increase the loss of source limit. Completing the study by September 2024 will allow for better coordinated planning and standardization across the Northeast and Mid-Atlantic and will in turn benefit the regions' ratepayers by accelerating the deployment of clean energy resources.

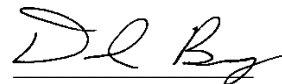
Thank you for considering this request.



Katie S. Dykes  
Commissioner, Department  
of Energy and Environmental  
Protection  
On behalf of Connecticut

  
Dayna Cobb (Mar 4, 2024 12:10 EST)

Dayna Cobb, Director,  
Division of Climate, Coastal  
and Energy, Department of  
Natural Resources and  
Environmental Control  
On behalf of Delaware



Dan Burgess  
Director, Governor's Energy  
Office  
On behalf of Maine

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<sup>4</sup> See e.g., <https://www.tennet.eu/news/tennet-has-opened-2gw-program-tender-525-kv-dc-offshore-cable-manufacturing-and-installation>.

<sup>5</sup> See *id.*

<sup>6</sup> See August 23, 2023 Response to ISO-NE from JIPC, available at [https://www.iso-ne.com/static-assets/documents/2023/08/2023\\_08\\_23\\_jipc\\_response\\_to\\_iso\\_letter.pdf](https://www.iso-ne.com/static-assets/documents/2023/08/2023_08_23_jipc_response_to_iso_letter.pdf).



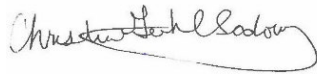
Paul Pinsky  
Director, Maryland Energy  
Administration  
On behalf of Maryland



Jason Marshall  
Deputy Secretary, Federal  
and Regional Energy Affairs,  
Executive Office of Energy  
and Environmental Affairs  
On behalf of Massachusetts



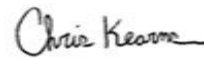
Jared Chicoine  
Commissioner, New  
Hampshire Department of  
Energy  
On behalf of New Hampshire



Christine Guhl-Sadovy  
President, Board of Public  
Utilities  
On behalf of New Jersey



Rory M. Christian  
Chair and Chief Executive  
Officer, New York Public  
Service Commission  
On behalf of New York



Chris Kearns  
Acting Commissioner, Office  
of Energy Resources  
On behalf of Rhode Island



June Tierney  
Commissioner, Vermont  
Department of Public Service  
On behalf of Vermont



Doreen M. Harris  
President and CEO, New  
York State Energy Research  
and Development Authority  
On behalf of New York

cc: Gordon van Welie, President & CEO, ISO New England  
Brent Oberlin, Director, Transmission Planning, ISO New England  
Richard Dewey, President & CEO, New York ISO  
Emilie Nelson, Executive Vice President & COO, New York ISO  
Manu Asthana, President and CEO, PJM Interconnection  
Asim Haque, Sr. VP, Governmental & Member Services, PJM Interconnection