

Planning Redispatch

At V.D.1.a of Order 890 (Paragraph 911), the Commission states that planning redispatch involves ex-ante determination of whether out-of-merit generation resources can be used to maintain firm service. The Phase I/II HVDC-TF is a closed circuit DC line with points of injection and withdrawal on the US side only at the international border and the Phase II Terminal at Sandy Pond.

Transmission Customers are required to make advanced reservations for transmission service over such facilities. The MW value of approved Firm Point-to-Point Transmission Service reservations over the Phase I/II HVDC-TF are not eroded or diminished at any time over their term for any reason other than outages or curtailments. No "native load preference" exists for transmission service over the facilities nor is there any other instance where one entity may pre-empt or otherwise make use of the firm capacity reserved by others unless such capacity is voluntarily re-assigned. Therefore it is both inappropriate and unnecessary for Schedule 20A Service Providers (SSPs) to conduct ex-ante determinations of whether out-of-merit generation resources can be used to maintain firm service. It would also be inappropriate for such SSPs to conduct system impact studies in conjunction with identifying relevant system constraints that impact service requests as the SSPs have no right or obligation to expand the Phase I/II HVDC-TF. Furthermore, under the Commission-approved HVDC-TOA the Asset Owners¹ of the Phase I/II HVDC-TF are only obligated to participate in regional planning for purposes of maintaining existing levels of regional reliability subject to limitations that are enumerated in that agreement. The Asset Owners are in no way obligated under any agreement to conduct planning solely for the purpose of accommodating transmission service requests over the Phase I/II HVDC-TF.

¹ New England Hydro-Transmission Electric Company, Inc.; New England Hydro-Transmission Corporation; New England Electric Transmission Corporation; and Vermont Electric Transmission Company ("Asset Owners").