



February 28, 2022

The Honorable Governor Baker
Massachusetts State House
24 Beacon Street
Boston, MA 02133

Dear Governor Baker,

We are writing to express our deep disappointment and concern about the recent decision by ISO-New England (ISO-NE) to delay eliminating the harmful Minimum Offer Price Rule (MOPR). We urge you to take a stand against the delay by opposing the delay on behalf of the Commonwealth at the Federal Energy Regulatory Commission (FERC).

The League of Women Voters of Massachusetts was founded in 1920 as a non-partisan organization working to empower and educate Massachusetts voters and affect change on a wide range of issues of social importance, including the environment and climate change. With 47 local Leagues throughout the state, we are also part of the national organization and its network of state Leagues. We all work as one League on the climate emergency.

Delaying the MOPR an additional two years - which amounts to a delay to 2028, because the 2025 capacity auction plans for 3 years ahead - presents a major roadblock in the Commonwealth's ability to meet its mandated decarbonization goals and develop new clean energy resources. The decision to delay eliminating the MOPR also highlights a lack of transparency at ISO-NE and a serious disconnect from the mandated climate goals of its member states. The MOPR prevents many clean energy resources, including offshore wind, from entering the forward capacity market - an important step in powering the grid with clean energy. At a time when all signs point to the need for urgent action and a redoubling of efforts to decarbonize key sectors of society through electrification powered by clean, renewable energy, ISO-NE is putting on the brakes. The Commonwealth must speak out at FERC in opposition to this delay.

Delaying the elimination of the MOPR contradicts the New England Governors' Vision Statement and previous statements by NESCOE, including calls for rapid reform of the regional markets and specifically the prompt elimination of the discriminatory MOPR. Starting in May 2021, ISO-NE itself indicated that it was confident in its ability to eliminate the MOPR in time for the 2023 capacity auction, and only changed course in favor of a delay proposal backed by fossil fuel generators one week before a final vote, without evidence or analysis. This continues ISO-NE's practice of operating behind closed doors and without the benefit of public engagement, in this case without even time for a meaningful conversation about its reversal.

ISO-NE now stands alone regarding the MOPR, as two other regions (the Mid-Atlantic and New York) with a similar rule have already requested approval to eliminate it as an outdated and



discriminatory practice. The Chair of the Federal Energy Regulatory Commission that oversees ISO-NE has also weighed in expressing a strong preference to end the MOPR as soon as possible.

Maintaining the MOPR would have real and lasting impacts on the health and well-being of residents in the Commonwealth, as well as our opportunities to grow a clean energy economy in the region. The League urges the Governor, on behalf of the Commonwealth and its residents, to take a position at FERC that clearly opposes the proposal to delay elimination of the MOPR. We urge the Governor to demonstrate the climate leadership that Massachusetts has shown time and time again. Now is the time for action and responsible leadership because much is at stake and we have no time to waste.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth L. Foster-Nolan". The signature is written in a cursive style.

Elizabeth Foster-Nolan
President, League of Women Voters of Massachusetts

Cc:

Commissioner Patrick Woodcock
MA Dept of Energy Resources

Chair Matthew Nelson
MA Department of Public Utilities

Secretary Kathleen A. Theoharides
MA Executive Office of Energy and Environmental Affairs

Undersecretary Judy Chang
MA Executive Office of Energy and Environmental Affairs Energy and Climate Solutions