Sustainable Energy Advantage, LLC (SEA) can provide clients with expertise in wholesale energy, capacity and ancillary service markets and transmission interconnection and planning, including assistance in understanding, navigating and influencing the various ISO/RTO stakeholder processes, market rules and tariff provisions. Focusing on issues pertinent to the participation, economics, risks and opportunities for renewable energy generation and energy storage in ISO New England and NYISO, SEA can support your needs in the following areas:

- **Understanding Wholesale Market Structure and Design** including:
  - Capacity market participation:
    - Completing capacity market show of interest and qualification
    - Enduring independent Market Monitor review (to overcome FCM MOPR rule)
    - Analyzing entry and exit strategies under ISO New England’s new ‘CASPR’ FCM substitution auction
  - Integrating storage, renewable energy and distributed energy resources
  - Energy and capacity bidding and offer strategies

- **Understanding Interconnection Issues under the Transmission Tariffs** including:
  - Assessing issues and options, including network transmission upgrade alternatives
  - Navigating the interconnection cluster study process
  - Monitoring the transmission planning process and its implications
  - Completing the standard interconnection process

- **Strategic Analysis** including:
  - Analyzing existing market rules, market trends and emerging issues
    - Evaluating the potential implications of proposed changes to market segments or specific clients
    - Helping clients identify strategies to take advantage of opportunities and mitigate any adverse impacts
  - State and Federal Policy Integration

- **Customized Modeling / Analysis** including:
  - Economic Modeling for FCM MOPR mitigation
  - Congestion implications

- **NEPOOL Stakeholder Process representation** including:
  - Attendance at NEPOOL Participants’ Committee and/or its primary technical committees: Markets Committee, Reliability Committee, Transmission Committee as well as subcommittees like the Variable Resources Working Group or the Demand Resources Working Group, Power Supply Planning Committee (PSPC) and other committees and working groups such as the Planning Advisory Committee (PAC)
  - Reporting on meeting content and outcomes
  - Providing strategic advice and guidance on positions to take on matters before committees

**Qualifications:** John Keene, SEA Senior Director, specializes in electric regulatory matters, wholesale electricity markets and transmission policy. Before joining SEA, John served as Director of ISO Advocacy and Assistant General Counsel for SunEdison/TerraForm Power (TERP) (and previously for First Wind prior to its acquisition by SunEd). John represented SunEd/TERP’s operational and development interests on issues such as interconnection processes, energy and capacity markets, and transmission policy relating to wind, solar and energy storage projects in regional ISOs including ISO-NE and NYISO. Previously, John served as Massachusetts Department of Public Utilities Director of the Division of Regional and Federal Affairs where he was the primary legal and policy advisor on matters including wholesale market design, transmission policy. John served as Vice Chair of the NEPOOL Alternative Resources sector for three terms, as Board member for RENEW Northeast, and NECPUC Electricity Staff Chair.
Dedicated ISO/RTO/Wholesale stakeholder process representation can provide significant value to companies participating in the wholesale markets. Examples of such RTO Representative support\(^1\) include:

### Forward Capacity Market Price Lock Opt-out
- Client Wind developer entered a wind project into the ISO New England Forward Capacity Auction.
  - Project cleared at FCA floor price and elected a multi-year price lock.
- Subsequently, in discussions regarding proposed FCM rules changes, **RTO Representative** successfully advocated for opportunity to opt-out of price lock
  - ISO-NE recognized reasonableness of the opt-out and included it in proposed rule changes ultimately approved by FERC.
- **RTO Representative** analyzed potential risks/opportunity of exercising the opt-out with client asset management, finance, & legal teams.
- **Result:** FCA prices increased substantially... exercise of opt-out resulted in increased revenue potential of 150%, over **$5M** to date.

### Forward Capacity Market Opportunity for DG
- Renewable Developer developed 17MW of net-metered solar projects in Massachusetts.
- Opportunities for participation in the capacity market had not been investigated.
- **RTO Representative** advised client on FCM opportunity, confirmed EDC has not exercised ROFR, led effort to enter projects into ISO-NE FCA.
  - Submitted Show of Interest & Qualification Packages ➔ Projects qualified.
  - **RTO Representative** handled entering projects into FCA using RTR exemption
- Projects cleared in FCA creating $175k in first year additional revenues (**note:** going forward, FCM participation decisions will also require analysis of Pay-for-Performance risk/reward)
- **RTO Representative** advised client on opportunity for FCA revenues in intervening years prior to first FCA commitment period, and entered projects into bilateral contract via private auction & ISO-NE reconfiguration auctions
- **Result:** access to additional market revenue

### Forward Capacity Market – Performance Incentives
- In 2014, ISO-NE filed proposed changes to Forward Capacity Market to introduce performance incentives & penalties.
- On **RTO Representative** recommendation, client supported ISO-NE proposal as proposed, potential upside exceeded risk for wind
- FERC’s Order approving proposal required that ISO-NE exempt resources behind intra-zonal constraints from payments/penalties.
- ISO-NE compliance proposal would have eliminated upside of performance incentive structure for wind behind constraints
- **RTO Representative** worked with outside counsel, to file protest at FERC arguing that the exemption is unnecessary
- FERC Compliance Order explicitly agreed with client, reversed direction, eliminated compliance requirement
- **Result:** preserving opportunity for performance incentives

### Interconnection Cluster Studies
- Due to backlog in ISO-NE interconnection queue of decades), **RTO Representative** developed a clustering study proposal, helped organize a supportive coalition, and advocated for clustering projects for interconnection review/system impact studies
- **Result:** After private discussions with ISO-NE, ISO-NE developed its own clustering proposal in response, which was ultimately adopted.

### Watching out for Client Interests
- ISO-NE proposed Interconnection Standards would require installation of Phase Measurement Units ➔ **RTO Representative** got proposal pulled; responsibility ultimately got shifted to transmission owners
- **Result:** Prevented unanticipated and obscure charges from blindsiding client

\(^1\) provided by SEA staff during prior employment