



Via FERC e-Comment

April 20, 2022

Chairman Glick and Commissioners
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20002

Dear Chairman Glick and FERC Commissioners:

On behalf of the Cape Cod Climate Change Collaborative, I'm writing to request that the Federal Energy Regulatory Commission (FERC) direct ISO New England (ISO-NE) to immediately eliminate the minimum offer price rule (MOPR) instead of maintaining it for the next two years.

The Cape Cod Climate Change Collaborative (CCCCC) is a several-thousand-member, non-profit organization whose mission to reduce ways in which the Cape and Islands contribute to climate change, a crisis which is causing —and will continue to cause — devastating environmental, economic, social and health impacts on our communities.

The Collaborative's leadership team includes leaders from every sector across the Cape Cod & Islands region including business, finance, transportation, building, education, policy, science, faith and many more. We all share a deep concern about already-documented negative impacts on our fisheries, increasing acidification of our coastal waters, rising sea levels and increasingly severe storms causing erosion and major property damage in our towns.

As the 6th IPCC's recent report states—and without *any* ambiguity--the climate crisis is now of such urgency that to delay *any* strong mitigation action will effectively eliminate our last, best chance to reduce its devastating impacts. The two-year delay makes no sense on any level and simply continues a history of delay and avoidance.

The MOPR decision adopted by ISO-NE is an abandonment of the critical responsibility given it and the NEPOOL advisory group and presents a major obstacle to the Commonwealth of Massachusetts' attaining goals set in its Clean Energy Climate Plan. It is clear to us, and by ISO-NE's own admission, that the rule will prevent renewable energy and storage from entering the forward-capacity market, thereby thwarting the states' climate objectives.

This delay in eliminating MOPR is a mistake. New England should immediately follow other regions like New York and eliminate the MOPR practice immediately. It is time for ISO-NE to build the grid of the future and support the health of our people and our planet rather than back-stopping existing fossil fuel interests.

Thank you for consideration of these comments.

Richard F. Delaney

Richard F. Delaney
Executive Director