

**To:** NECPUC

**From:** Carolyn O'Connor

**Date:** June 21, 2010

**Subject:** Update on Recent and Upcoming Regional Activities

This memo is prepared by ISO's External Affairs Department to provide an update on several regional activities that may be of interest to the States. For your convenience, when appropriate, I have identified dates when key discussions and votes are scheduled to occur at upcoming stakeholder meetings, as well as planned filings.

There is also a section highlighting upcoming ISO speaking engagements and meetings that may be of interest.

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## Issues and Updates

### **Assessments Show Transmission Needs for Lower SEMA and Greater Boston Areas**

ISO New England recently released Needs Assessments (NA) for the Lower Southeastern Massachusetts (SEMA) and Greater Boston areas.<sup>1</sup>

Needs Assessments are studies of the New England transmission system that seek to identify and summarize system reliability needs. In turn, Solution Studies provide potential transmission solutions that address the identified needs. Together, Needs Assessments and Solution Studies provide a basis for ISO New England's annual Regional System Plan.

#### *Lower SEMA*

##### Background

The Lower SEMA area includes all of Cape Cod and the Islands, and cities and towns north of the Cape (up to Marshfield) and west (to New Bedford). The area is supplied by three 345 kV and three 115 kV lines and relies on oil-fired generation at Canal Station.

Pursuant to a 2007 settlement agreement between the ISO and various entities, the ISO was required to produce short-term and long-term plans to reduce or eliminate reliance on the Canal units for reliability.<sup>2</sup> Short-term plans included transmission upgrades (completed in 2009) that greatly improved the reliability of the area and significantly reduced the need to run the Canal units.<sup>3</sup> The Lower SEMA Needs Assessment was conducted to identify any remaining issues following implementation of the short-term upgrades.

##### Key Findings

The NA looked at the reliability-based transmission needs of the area in the years 2013 and 2018 at peak demand load levels, and considered all available resources (including demand resources), and those acquired through the Forward Capacity Auctions. Due to continuing load growth and inadequate infrastructure to meet future demand, a number of concerns were identified: (1) system reliability is compromised when the New England load level hits approximately 20,000 MW and above;<sup>4</sup> (2) the transmission system supplying load on the Cape east of the Bourne substation is inadequate; and (3) in the event of a second contingency, remaining transmission lines can become overloaded and result in thermal and voltage violations.

The NA also determined that Lower SEMA will continue to rely upon Canal generation for reliability and that this need will grow proportionally to the load growth in the area. Additionally, the assessment found that the area will continue to be import constrained, and that reactive resources will be needed to ensure adequate voltages and to support load growth.

To help address these concerns, an additional transmission line and/or other resources are needed.

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<sup>1</sup> The Needs Assessments are posted at the following link, [http://www.iso-ne.com/committees/comm\\_wkgrps/prtcpnts\\_comm/pac/reports/index.html](http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/pac/reports/index.html) (please note that you will need CEII clearance to access the reports.)

<sup>2</sup> In January 2006, Canal units were running out-of-merit due to the high cost of oil, resulting in expensive uplift costs. The [SEMA Settlement Agreement](#) set out details to address the payment of reliability costs and required that both short-term and long-term plans be studied and implemented in order to reduce or eliminate reliance on the Canal Units for reliability.

<sup>3</sup> As a result of transmission upgrades in Lower SEMA and in Southwest Connecticut, out-of-market costs have dropped significantly, from \$256 million in 2008 to \$55 million in 2009; ISO New England, Inc., *2009 Annual Markets Report* (May 18, 2010), Section 7.1; [http://www.iso-ne.com/markets/mktmonmit/rpts/other/amr09\\_final\\_051810.pdf](http://www.iso-ne.com/markets/mktmonmit/rpts/other/amr09_final_051810.pdf).

<sup>4</sup> These needs are warranted even with the lower [2010 CELT](#) load forecast and with resources procured through the first three Forward Capacity Auctions. CELT report is an annual 10-year forecast on the capacity, energy, load and transmission for New England.

### Next Steps

The Solution Study<sup>5</sup> analyzed several transmission options and selected a preferred solution that was presented to the Planning Advisory Committee (PAC) at its April 27 meeting.<sup>6</sup> The preferred solution, NSTAR's Lower SEMA transmission project, seeks to build a new 345 kV line from Carver to the Bourne vicinity. This project will help eliminate reliance on local generation and improve transfer capability. Projected costs for this project are \$110 million with an estimated in-service date of late 2012. NSTAR is expected to file this project with the Massachusetts Energy Facilities Siting Board in July 2010.

### *Greater Boston Area*

#### Background

The Greater Boston Needs Assessment studied several load zones, including all of Northeastern Massachusetts (NEMA), and parts of Western/Central Massachusetts (WCMA) (as far west as Natick), and SEMA (as far south as Milton). Looking beyond the NEMA/Boston import area allows for a comprehensive assessment of the Boston area. It also allows potential solutions that are developed to solve surrounding area needs to be coordinated and designed to remedy multiple Boston area needs. For example, the Greater Boston NA was coordinated with other surrounding area assessments that were in progress, such as the New Hampshire Needs Assessment.

The Greater Boston area is served by 345 kV, 230 kV, 115 kV and 69 kV transmission lines and substations. Generating units to supply the Boston area range in size from 10 MW to 800 MW. Additionally, several hundred MW are available in active and passive demand resources. In 2009, NSTAR completed major enhancements to the transmission system in Boston – three new underground 345 kV cables and new and upgraded substations – to meet system reliability needs. The project also improved Boston's import capability to meet its growing demand.

The Greater Boston Needs Assessment looked at the reliability-based needs of the area for 2013 and 2018 using peak demand load levels as indicated in the 2008 CELT report<sup>7</sup> (the report that was available at the time the study began).<sup>8</sup> Since there are major transmission projects throughout New England that are either being studied or are in siting, the NA included upgrades associated with the Maine Power Reliability Program, Greater Rhode Island upgrades, the New England East West Solutions projects and the Lower SEMA project.

In response to stakeholder concerns, the NA also considered sensitivity cases based on the potential retirement of a unit at Mystic (an older generator in Boston that, in the past, has sought reliability determinations from the ISO) and the Salem Harbor plant (which has sought to delist from the FCA).

### Key Findings and Next Steps

Results of the draft NA show that there are a significant number of thermal and voltage violations across a number of subareas<sup>9</sup> within the Greater Boston system, (for both 2013 and 2018 peak load conditions), and that current transmission infrastructure will not be able to meet reliability standards. The ISO is conducting analysis

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<sup>5</sup> The *Draft Lower Southeastern Massachusetts (LSM) Long-Term Solution Study Report* is posted at the following link, [http://www.iso-ne.com/committees/comm\\_wkgrps/prtcpnts\\_comm/pac/reports/index.html](http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/pac/reports/index.html) (please note that you will need CEII clearance to access the reports.)

<sup>6</sup> The "Long Term Lower Southeast Massachusetts (LSM) Needs Assessment/Solutions Status Update" presentation from the April 27 PAC meeting can be found at the following link (note: CEII clearance is needed to access the presentation); [http://www.iso-ne.com/committees/comm\\_wkgrps/prtcpnts\\_comm/pac/mtrls/2010/apr272010/index.html](http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/pac/mtrls/2010/apr272010/index.html)

<sup>7</sup> 2008 CELT: <http://www.iso-ne.com/trans/celt/report/2008/index.html>.

<sup>8</sup> A revised critical load level analysis is currently in progress with respect to the [2010 CELT](#) and resources that were acquired through FCA-3.

<sup>9</sup> These eight subareas are: Northern ties to Greater Boston; Woburn and Lexington area; downtown Boston; Sudbury, Marlborough and Northborough area; Hollbrook and West Walpole; Boston, Golden Hills and Wakefield Junction area; Salem; and Tewksbury.

to define the critical load level for each reliability violation; the analysis will be released as an addendum to the Greater Boston Needs Assessment.

The ongoing Solution Study is evaluating transmission options to eliminate thermal and voltage violations identified in the Needs Assessment. Transmission solutions may include new 345 and 115 kV lines and associated upgrades of existing equipment and reconfiguration of existing stations. Transmission solutions for the Greater Boston area are expected to be presented to the PAC in fall 2010.

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### **Notice of Proposed Rulemaking: Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities**

On June 17, FERC issued a [Notice of Proposed Rulemaking](#) (NOPR) to amend open access transmission reforms created through [Order No. 890](#). The NOPR seeks to establish closer links between regional electric transmission planning and cost allocation to help ensure that needed transmission facilities are built.

The NOPR proposes and seeks comment on requiring:

- Transmission providers to establish a closer link between cost allocation and regional transmission planning by identifying and establishing cost allocation methods for beneficiaries of new transmission facilities;
- Transmission planning to take into account needs driven by public policy requirements established by state or federal laws or regulations;
- Neighboring transmission planning regions to improve their coordination with respect to facilities that are proposed to be constructed in two adjacent regions and could address transmission needs more efficiently than separate intraregional facilities; and
- The removal from Commission-approved tariffs or agreements provisions that provide an undue advantage to an incumbent developer so that sponsors of transmission projects have the right, consistent with state or local laws or regulations, to build and own facilities selected for inclusion in regional transmission plans.

Comments on the NOPR may be filed with the FERC no later than 60 days after the proposed rule has been published in the Federal Register.

For more information, please see FERC's [Fact Sheet](#) on the NOPR.

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### **Smart Grid Funding Update**

The ISO and the region's transmission owners finalized a grant agreement with the US Department of Energy on June 3, 2010 for a smart grid investment grant to implement the synchrophasor infrastructure and data utilization (SIDU) project in New England.<sup>10</sup> With funding now set, the \$18 million SIDU project is on schedule to begin July 1, 2010.

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### **Financial Assurance Policy Update**

On May 26, 2010, the FERC accepted [revisions](#) to the ISO New England Financial Assurance Policy (FAP) that were filed by the ISO and NEPOOL.

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<sup>10</sup> This project is described in greater detail in the April 2010 NECPUC update memo which is posted at [http://www.iso-ne.com/committees/comm\\_wkgrps/othr/clg/mnthly\\_issu\\_memo/2010\\_april\\_issues\\_memo.pdf](http://www.iso-ne.com/committees/comm_wkgrps/othr/clg/mnthly_issu_memo/2010_april_issues_memo.pdf).

FERC-approved revisions include:

- A clarification that the “lead market participant” for a resource is responsible for financial assurance (FA) related to the FCM.
- A new calculation was developed to prevent over/under collateralization for capacity charges.
- If a market participant has provided the financial assurance required for a capacity supply obligation bilateral, then that capacity supply obligation bilateral will not be deemed terminated if that market participant is suspended.
- The FAP was revised to strike language that was largely duplicated in Market Rule 1 regarding the ISO drawing down of financial assurance and terminating capacity supply obligation in the event that the resource fails to perform pursuant to Market Rule 1. This change leaves intact the provision in the FAP providing the right of the ISO to draw FA and terminate a FCM participant’s capacity supply obligation in the event that a participant fails to cure a market suspension under the FAP or Billing Policy.
- If a bank fails to honor a letter of credit, the ISO will issue a notice of such failure to the ISO stakeholders and to the billing and credit contacts for all market participants. Further, if in a 24-month period, a bank either fails to honor the terms of a single letter of credit on two occasions or fails to honor two separate letters of credit, then the bank will no longer be eligible to extend letters of credit to the ISO.

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### **Notice of Proposed Rulemaking on Demand Response**

On March 18, 2010, FERC issued a [Notice of Proposed Rulemaking](#) (NOPR) relative to Demand Response Compensation in Organized Wholesale Energy Markets (130 FERC ¶ 61,213 Docket RM10-17-000). In the NOPR, FERC requested comments on a proposed rule that requires ISOs and RTOs to pay demand response providers the full locational marginal price (LMP) for demand reductions in all hours when demand-response resources reduce energy consumption.<sup>11</sup>

On May 13, 2010, the ISO filed its [response](#) to the NOPR. In the filing, ISO notes that payment of full LMP to demand resources can lead to inefficient outcomes in the energy market. For example, paying full LMP to demand resources could result in the dispatch of higher-cost demand resources that will displace lower-cost generation in the wholesale market which will result in higher costs to consumers. Furthermore, the proposed rule “introduces baseline estimation and cost allocation problems, neither of which is addressed in the NOPR and both of which must be fully addressed before any final rules can be issued.”<sup>12</sup>

ISO’s comments indicated two possible ways to correct the inefficiencies created by the proposed rule in the NOPR.

“First, if the objective is payment of the full LMP in all hours in which the consumption of electricity was reduced from expected levels in response to price signals, then the day-ahead purchase of expected energy use, or some other advance purchase requirement, should be required. This is efficient, avoids the need for an estimated baseline, and avoids the need to allocate costs of payments to demand resources. If the Commission does not wish to impose a day-ahead or other advance purchase requirement for expected energy usage, then payment of the LMP net of the retail generation rate (i.e., “LMP – G”) is appropriate. Costs of these payments

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<sup>11</sup> [NOPR](#), pages 12-13. “Commission proposes to add section 35.18(g)(1)(v) to our regulations to establish a specific compensation approach for demand response resources participating in organized wholesale energy markets . . . Under the proposed section, each Commission-approved ISO and RTO that has a tariff provision providing for participation of demand response resources in its energy market must pay demand response resources, in all hours, the market price for energy, i.e. full LMP, for demand reductions made in response to price signals.”

<sup>12</sup> See [ISO’s May 13 Response to FERC DR NOPR](#), p. 4.

should be borne by the associated load-serving entity whose load was reduced by the demand response.”<sup>13</sup>

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### **Tie Benefits Update**

The ISO and New England stakeholders are continuing to work through outstanding issues related to the methodology for calculating tie benefits (the amount of emergency energy available from neighboring systems). The ISO posted a [straw proposal](#) in May that was discussed at a special Reliability Committee (RC) meeting on June 18.<sup>14</sup> The straw proposal addresses calculating tie benefits for individual tie lines; modeling other control areas; modeling internal transmission constraints in New England; and modeling internal transmission constraints in neighboring control areas. The RC plans to take non-binding straw votes on the ISO and alternative stakeholder proposals at the next meeting.

#### *Calculating tie benefits for individual tie lines*

The ISO recommends calculating tie benefits for individual tie lines. (Currently, the ISO calculates tie benefits from each of the three external interfaces—Hydro Québec, New Brunswick, and New York, and for New England as a whole.) The ISO would start by calculating total tie benefits and then allocate tie benefits to each control area and then to individual ties. The ISO recommends giving equal rights to existing and future ties when allocating tie benefits for each control area. Alternatively, Northeast Utilities recommends allocating tie benefits based on vintage, i.e., giving priority to transmission ties with earlier in-service dates.

#### *Modeling internal transmission constraints in New England*

The ISO recommends modeling internal New England interfaces under certain circumstances, but is still in discussion with stakeholders about which interfaces to model and how to model the constraints.

#### *Modeling internal transmission constraints in neighboring control areas*

The ISO recommends modeling internal constraints in New York. (The ISO identified no internal constraints in HQ or New Brunswick during the summer peak-demand period.)

#### *Modeling other control area*

The ISO recommends not modeling PJM and Ontario (two non-adjacent control areas) in tie-benefit calculations. The ISO does not currently model these control areas and successful delivery of emergency power from PJM and Ontario through New York to the New England border is unknown and untested. Furthermore, ISO studies show minimal benefit from these areas when internal transmission constraints in New York are modeled.

The RC supported an ISO recommendation to use the GE Multi-Area Reliability Simulation (MARS) Program simulation model for calculating Installed Capacity Requirements going forward. GE MARS is more advanced than the Westinghouse model that is currently used for ICR and will provide more capability to model operational constraints.

#### *Operations view*

Also on June 18, Peter Brandien, ISO’s Vice President of System Operations, presented an operations view of tie benefits. He described the reliability standards that require system operators to ensure the region maintains adequate operating reserves and how operators manage the flows on external transmission ties. He presented an analysis indicating that New England’s total transfer capability of 4,100 MW across all three external

<sup>13</sup> See [ISO’s May 13 Response to FERC DR NOPR](#), p. 5.

<sup>14</sup> To view the meeting materials from the June 18 RC meeting, please go to [http://www.iso-ne.com/committees/comm\\_wkgrps/reblty\\_comm/reblty/mtrls/2010/jun182010/index.html](http://www.iso-ne.com/committees/comm_wkgrps/reblty_comm/reblty/mtrls/2010/jun182010/index.html).

transmission interfaces can be reduced to approximately 2,875 MW based on restrictions on the New Brunswick and New York interfaces.

The ISO is scheduled to meet monthly with stakeholders at the RC through September in preparation for making a FERC filing in December 2010 to revise the methodology for calculating tie benefits. Additional meetings are scheduled on the following dates:

- Tuesday, July 20 DoubleTree, Westborough, Massachusetts
- Wednesday, August 25 DoubleTree, Westborough, Massachusetts
- Wednesday September 22 Publick House, Sturbridge, Massachusetts

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### **Load Reconstitution Update**

Under the existing FCM structure for the first three commitment years, the ISO will not perform load reconstitution for demand resources (FCA-1 through FCA-3 [June 1, 2010 through May 31, 2013]). At the May NEPOOL Markets Committee Meeting, the committee voted to continue the load reconstitution moratorium for an additional two years – through FCA-5 (through May 31, 2015).

At the June NEPOOL Participants Committee, the committee supported the general recommendation of the Markets Committee, and almost 93% of the committee voted to continue to:

“defer until September 2011 efforts to implement voluntarily a load reconstitution methodology for Demand Resources with the understanding and agreement that ISO-NE will file a recommendation to institute or not to institute a load reconstitution methodology with the FERC pursuant to Section 205 of the Federal Power Act on or before February 1, 2012 and the further understanding that this agreement does not restrict an earlier filing by ISO-NE and/or an earlier effective date if either is required to comply with any final FERC determination on the issue of reconstitution in ongoing proceedings.”<sup>15</sup>

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### **Stakeholder Meeting on FERC FCM Order**

At a June 15 stakeholder meeting, the ISO discussed its draft response to FERC’s April 23 [Order](#) regarding FCM reforms. The presentation provided at this meeting is available on the ISO’s website, [http://www.iso-ne.com/pubs/pubcomm/pres\\_spchs/2010/final\\_prop\\_fcm\\_rev6\\_15\\_10.pdf](http://www.iso-ne.com/pubs/pubcomm/pres_spchs/2010/final_prop_fcm_rev6_15_10.pdf).

This presentation outlines the ISO's response to FERC's guidance on the Alternative Price Rule, out of market resources, zones and mitigation. As set out in the schedule in the order, ISO will submit its first set of briefs on July 1, 2010, and subsequent briefs are due by September 1, 2010.

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### **Planning Advisory Committee**

The next meeting of the Planning Advisory Committee (PAC) will be held **July 15** beginning at 9:30 a.m., at the Doubletree Hotel in Westborough, Massachusetts.

#### *Preliminary Agenda:*

- Interregional economic studies
- VT/NH Needs Assessment
- VT substation rebuilds and reactive power
- Long-term Lower SEMA costs

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<sup>15</sup> See Section 7 of June 4 NEPOOL Participants Committee Supplemental Notice, [www.iso-ne.com/committees/comm\\_wkgrps/prtcpnts\\_comm/prtcpnts/mtrls/2010/jun42010/supplemental\\_notice\\_june\\_4\\_2010\\_npc\\_mtg.pdf](http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/prtcpnts/mtrls/2010/jun42010/supplemental_notice_june_4_2010_npc_mtg.pdf).

Please save the following dates for future PAC meetings:

- **August 12** draft RSP page turn at the Doubletree Hotel in Westborough, MA (The draft report will be posted in advance of the meeting.)
- **September 16** RSP public meeting at the Colonnade Hotel in Boston (This year’s meeting is scheduled to run from 9:30 a.m. to 3:30 p.m., and will include an expanded format to allow for additional topics and discussions with stakeholders.)

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**Markets Committee Two-Month Look Ahead**

The NEPOOL Markets Committee preliminary agendas for July and August meetings were released. The tentative agenda topics to be discussed and or voted upon include:

<b>July 12, 13 and 14, 2010</b> <b>Ocean Edge Resort &amp; Golf Club, Brewster, MA</b>	<b>August 10 and 11, 2010</b> <b>Courtyard Marriott, Marlborough, MA</b>
<b>Financial Assurance Revisions for New DR</b> Vote on the DR Providers’ proposed Market Rule changes	<b>Appendix H FCM Conforming Changes</b> Vote on the ISO’s proposed Appendix H FCM conforming changes
<b>Demand Resource Performance Penalty Cap</b> Vote on the ISO’s proposed Market Rule changes	<b>FTR Market Enhancements</b> Vote on DC Energy’s proposed Market Rule changes
<b>Appendix H FCM Conforming Changes</b> Present and discuss the ISO’s proposed Appendix H FCM conforming changes	<b>FCM (Omnibus 7)</b> Vote on the ISO’s proposed Market Rule changes
<b>FTR Market Enhancements</b> Present and discuss DC Energy’s proposed Market Rule changes	<b>ISO Manual M-27 (Retirement) &amp; M-28/M-29 (Revisions)</b> Vote on the ISO’s proposed retirement of M-27 and revisions to M-28/M-29
<b>FCM (Omnibus 7)</b> Present and discuss the ISO’s proposed Market Rule changes	<b>Economic Impact Analysis</b> Present and discuss the economic impact analysis subject (re: FERC Order 719; RTO responsiveness)
<b>Economic Impact Analysis</b> Introduce the economic impact analysis subject (re: FERC Order 719; RTO responsiveness)	<b>FCM Qualification of Merchant Transmission</b> Present and discuss the ISO’s proposed Market Rule changes
<b>FCM Qualification of Merchant Transmission</b> Introduce the ISO proposal	<b>FCM Update (Alternative Capacity Price Rule (APR))</b> Present and discuss the FCM APR subject
<b>FCM Update (Alternative Capacity Price Rule (APR))</b> Introduce the FCM APR subject	<b>FCM Qualification Timeframes (Show of Interest)</b> Present and discuss the ISO’s proposed Market Rule changes
<b>FCM Qualification Timeframes (Show of Interest)</b> Introduce the ISO proposal	<b>Forward Reserve Market Cost Allocation Modification</b> Present and discuss the ISO’s proposed Market Rule changes
	<b>Secondary FTR Credit Risk Exposure</b> Present and discuss the ISO’s proposed revisions to Manuals M-06 and M-35 (re: MR 1 FERC Filing dated May 5, 2010 for ER10-1190)

**ISO Speaking Engagements and Other Meetings of Interest**

June 24, 2010

**Briefing on the Progress and Challenges Facing the New England Power System,**  
Washington, D.C.  
ISO New England Meeting with Congressional Delegation and Staff

July 12, 2010

**34<sup>th</sup> Conference of New England Governors and Eastern Canadian Premiers,** Cranwell  
Resort, Lenox, MA

August 16, 2010

**Council of State Governments Eastern Regional Conference, Advancing the Clean Energy Economy in the Northeast**, Portland, ME.

*ISO New England speaker:* Gordon van Welie, President and CEO

For more information, please see the conference [Web site](#).

October 27, 2010

**Atlantic Canada Power Summit**, Saint John, New Brunswick

*ISO New England speaker:* Stephen Rourke, Vice President, System Planning

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**Upcoming NEPOOL and ISO Committee Meetings of Interest**

Tentative dates for upcoming stakeholder meetings and other meetings of interest:

	<a href="#">Participants Committee</a>	<a href="#">Markets Committee</a>	<a href="#">Reliability Committee</a>	<a href="#">Planning Advisory Committee</a>	<a href="#">Transmission Committee</a>	<a href="#">Consumer Liaison Group</a>	NECPUC Conference Call	Consumer Advocate Conference Call
<b>June</b>	<i>Summer meeting: 22-23</i>				28			
<b>July</b>	-	12-14	19, 20	15	21		9	20
<b>August</b>	6	10-11	<i>Joint RC/TC Summer Meeting: 16-17</i>	12	<i>Joint RC/TC Summer Meeting: 16-17</i>	5	9	18