



November 11, 2021

Re: Docket No. is ER22-378 - ISO-New England Forward Capacity Auction Process

Dear Distinguished FERC Commissioners:

Greater Boston Physicians for Social Responsibility (GBPSR) is a physician-led group of health professionals and community members working to address two of the existential threats to human health: nuclear war and climate change. Our members include nationally recognized experts in public health, cancer epidemiology, occupational medicine, environmental health, emergency medicine, disaster preparedness, and the health effects of climate change. We offer state-of-the-science and up-to-date medical and public health information about the effects of fossil fuels on human health and the climate crisis.

Thank you for this opportunity to comment on the forward capacity auction process and priorities of ISO-New England. During the yearly auction of the Forward Capacity Market, energy producers compete based only on reliability and cost. However, the auction process should also account for the environmental and social impact of competing energy sources. ISO-New England must immediately prioritize wind and solar power over coal, gas, and oil. They must end the de facto subsidies to the fossil fuel industry that are embedded in the outdated notion that “every electron is neutral.” We also ask for greater transparency from ISO-New England in their grid transition planning and that they allow for more public participation.

Beyond reliability concerns, burning coal and other fossil fuels is destructive to the planet and to human health. The International Panel on Climate Change (IPCC) and the International Energy Agency (IEA) have both clearly stated that fossil fuels are driving the climate crisis and every country must significantly reduce them in the next ten years. Over 100 U.S. health

organizations and 200 health journals have declared the climate crisis a health emergency, which is already affecting the health of Americans. Americans are suffering more heat-related deaths, more disaster-related deaths, and an increase in vector-borne illnesses like Lyme disease, among other health impacts. Further, air pollution from fossil fuels causes an estimated 350,000 deaths in the U.S. a year and increases the risk of respiratory disease, cardiovascular disease, and dementia. The burden of these diseases is often greatest in communities who have the highest exposure to air pollution—Black, Indigenous, and other people of color.

Given the climate crisis, the Merrimack Generating Station in Bow, New Hampshire, and other fossil fuel plants should not be prioritized over more sustainable, renewable alternatives, even if the renewable sources are slightly more expensive in the near-term. ISO-New England can no longer ignore the long-term costs of fossil fuels' impact on the climate. In 2020 alone, communities spent \$100 billion to recover from weather and climate-related disasters, almost twice as much as we spent from 2000-2009 combined (\$54 billion). Instead of subsidizing forward capacity to fossil fuel plants like the one in Bow, money could be directed to projects that increase long-term reliability and improve, rather than destroy, climate resilience. Investments in clean technologies in place of fossil fuels will save billions of dollars in averted natural disasters and needless health expenditures due to the deleterious effects of fossil fuels on human health and the climate. Fossil fuels are a tether to the past. It is time to invest in the future.

We ask that FERC be a leader in the grid transition and in that capacity, guide ISO-New England to change their algorithm to incentivize clean, sustainable, renewable energy. We also ask for greater transparency and public participation in ISO-New England's grid transition planning. FERC's stewardship on this issue will play a pivotal role to making the necessary changes to New England's grid, and in turn it will make New England a safer, healthier place to live.

Sincerely,



Brita Lundberg, MD  
Board Chair