November 9, 2026

Dear Indicated New England Transmission Owners:

I write in response to your request for a two-year extension of time to comply with the ambient-adjusted line ratings requirements of Order No. 881, which the Commission issued in December 2021. I respectfully urge you to reconsider that request and commit to a substantially faster timeline.

We share a responsibility to deliver reliable, affordable power to the American people. This includes expediently implementing proven tools that let us deliver electricity more efficiently. Ambient-adjusted line ratings allow grid operators to account for the amount of power transmission lines can actually carry rather than relying on static ratings that assume worst-case conditions. That means moving more power over existing infrastructure and lowering costs for everyday consumers.

And these savings are not theoretical. Independent analysis in other regions has shown that implementing ambient-adjusted ratings can save consumers hundreds of millions of dollars annually.[1] New England has long led the nation on energy efficiency – demonstrating leadership on ambient-adjusted line ratings is an opportunity to continue that legacy.

Others have shown that this work can be done now: PJM began using ambient-adjusted ratings across its footprint in March 2026, Vermont Electric Power Company[2] is ready to implement Order No. 881 today, and ISO New England has indicated it will be ready to receive utilities' hourly line ratings on November 17, 2026, the first day of your requested 2-year extension.[3]

I recognize that you face competing demands across important priorities. However, I believe protecting customers from the costs of outdated transmission line ratings must be among them. Case in point, the California Independent System Operator recently sought a one-year delay to comply with Order No. 881,[4] but reduced its request to six months to deliver for consumers.[5] I ask that you show the same leadership: make an affirmative commitment to prioritize ambient-adjusted line ratings implementation and comply with the rule on an accelerated timeline by April 1, 2027.

Thank you for your consideration.

Sincerely,

David Rosner, Commissioner

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[1] As I have noted, the MISO Independent Market Monitor estimates that between 2023 and 2024 transmission customers paid an additional half a billion dollars due to the lack of temperature adjusted ratings. *See* https://www.ferc.gov/news-events/news/commissioner-rosners-concurrence-order-granting-extension-time-re-miso-inc-under.

[2] *See* https://www.iso-ne.com/static-assets/documents/100040/mtlf-technical-working-group-october-2026.pdf.

[3] *See* ISO-NE, Notice of Effective Date, Docket No. ER22-2357-003 (filed Oct. 15, 2026).

[4] *See* CAISO, Motion for Extension of Time, Docket No. ER22-2362-000 (filed Oct. 21, 2026) (requesting to delay Order No. 881 compliance until December 16, 2027).

[5] *See* CAISO, Motion for Extension of Time, Docket No. ER22-2362-000 (filed Nov. 2, 2026) (requesting to delay Order No. 881 compliance until April 1, 2027); *see also* CAISO, Notice of Withdrawal of 10/21/2026 Motion for Extension of Time, Docket No. ER22-2362-000 (filed Oct. 22, 2026).