Living with the Comparability Standard

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May 23, 1995
NU is Vigorously Competing within the Comparability Standard:

NU has Open Access Tariffs

MEGA-NOPR models NU's Tariffs

NU is on its own Tariffs
One Size Does Not Fit All:

Highly Coordinated Pools are Part of the Solution Not the Problem

Reliability & Economic Dispatch

Pools can Facilitate Competition
NEPOOL Provides Many Benefits:

Central Dispatch
Reliability Tied to Load Responsibility
Settlement Process Facilitates Bilateral Contracts
Coordinated Planning
Information Access
Flexibility
Potential NEPOOL Issues Raised by MEGA-NOPR:

Pool-Planned Unit Wheeling

Energy Wheeling

Ancillary Services

MEGA-NOPR Shouldn't Reject NEPOOL
FERC Market Power Test Should Reflect Market Realities

FERC Focus on Generation

Market Reality:

Capacity Market

Energy Market
Stranded Cost Recovery is Essential to an Orderly Transition

MEGA-NOPR Balances Interests

Puts Competition on the Margin

Fair Treatment of Retail Stranded Costs is Necessary