



April 24, 2025

Heather Hunt  
Executive Director  
New England States Committee on Electricity

Dear Ms. Hunt:

New England Power Company d/b/a National Grid confirms its strong commitment to work with the New England States Committee on Electricity (NESCOE), New England state regulators, ISO New England (ISO-NE), New England transmission owners, and interested stakeholders to enhance the region's consideration of asset condition projects.

Over the past two years National Grid has worked with the other New England Transmission Owners to enhance the transparency of the asset condition process. This has led to the establishment of significant enhancements in the way these projects are presented, the level of supporting information provided, the standardization of assessment criteria, and improved opportunities for stakeholder engagement. National Grid fully supports these enhancements and remains committed to working further on these as we all gain experience in their application.

National Grid also supports extending this initiative to develop and implement an asset condition project review process for Pool Transmission Facility (PTF) assets, including an independent reviewer consistent with the preconditions required by ISO-NE to undertake such a role, namely:

- National Grid will indemnify ISO-NE for any liability related to the ISO's reviewer role on our asset condition projects.
- The Reviewer's role is advisory. It will not make decisions about whether to proceed with specific asset condition projects, nor will it be a moving party in any local, state or federal regulatory or siting proceeding related to its advisory review of an asset condition project.
- The Reviewer will have no role in reviewing the prudence of costs of asset condition projects

This commitment is consistent with National Grid's overall vision of delivering a fair, affordable, and clean energy future for all its customers while meeting state policy goals and maintaining system reliability.

One of the primary obligations of a regulated public utility like National Grid is the maintenance, repair, and replacement of its facilities to ensure ongoing reliable and cost-effective service to customers. As always, we remain committed to maintaining our assets most efficiently, effectively, and affordably for our customers and the region. National Grid has a robust internal

process for maintaining the condition of its assets. In recent years, National Grid has been working with other New England transmission owners to address concerns raised by NESCOE and New England regulators as well as other interested stakeholders by enhancing the transparency of asset condition project planning and providing additional opportunities for stakeholder participation in the review of asset condition projects. Among other things, these efforts have resulted in the Joint New England Transmission Owner Asset Condition Process Guide. Although progress has been made in these efforts, National Grid acknowledges that additional process improvements are essential to provide the level of oversight NESCOE and state regulators are seeking.

National Grid supports the establishment of an independent asset condition reviewer for PTF asset condition projects to be built and owned by the New England Participating Transmission Owners. National Grid believes ISO-NE is well suited to perform this role. National Grid anticipates that as the asset condition reviewer, ISO-NE will have the necessary knowledge and experience to undertake a robust review of alternatives before asset condition projects advance as well as to promote improved integration of the asset condition process with regional planning processes. An improved asset condition review process will also provide a further forum for addressing stakeholder questions and considering the cost impacts of asset condition projects. Such an asset condition project review process can be implemented, if necessary, though appropriate joint filings with the Federal Energy Regulatory Commission (FERC) building on the existing legal and regulatory framework for maintaining the New England transmission grid in New England. National Grid expects this review process will provide greater assurances that the asset condition projects engineered and constructed by National Grid are reasonable and appropriate to meet ongoing network and customer service needs.

We look forward to working with NESCOE, state regulators, ISO-NE, New England transmission owners and other interested stakeholders to move forward expeditiously to develop and implement such an asset condition project review process and define the role of an independent asset condition reviewer.

Thank you for your efforts on behalf of New England customers. Please do not hesitate to reach out to discuss National Grid's commitment discussed above.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert A. Schneller", with a stylized flourish at the end.

Andrew Schneller

Vice President, Network Strategy and Regulation, Electric – New England

cc:

Jason Marshall

Deputy Secretary/Special Counsel for Regional & Federal Energy Affairs

Massachusetts Executive Office of Energy & Environmental Affairs