

May 16, 2025

To: NESCOE Managers and Staff, Connecticut Department of Energy and Environmental Protection, Maine Public Utilities Commission

CC: ISO New England, Planning Advisory Committee, Connecticut Office of Consumer Counsel, Maine Office of the Public Advocate

From: Avangrid

Subject: Independent Reviewer for Asset Condition Projects in New England

Avangrid extends its appreciation to the New England States and to ISO New England (ISO-NE) for the positive engagement on asset condition planning. We affirm our strong support for the establishment of an independent asset condition reviewer within ISO-NE and are very encouraged that ISO-NE has committed to working with the states and the New England Transmission Owners (NETOs) to accept this important role. Avangrid first indicated to the New England States its interest in exploring the concept of ISO-NE as an independent asset condition reviewer in the Fall of 2024. Since then, the idea has matured significantly, and we now believe the time is right to move forward and make this concept a reality. ISO-NE is uniquely positioned to offer an impartial and technically informed perspective on how asset condition solutions align with a comprehensive, forward-looking approach to transmission system planning.

Together with the NETOs, Avangrid has advanced several initiatives to enhance transparency in asset condition planning and decision making. While these efforts have been well-received, we recognize that some stakeholders have expressed concerns about a persistent gap in technical expertise and knowledge. This gap can make it difficult to fully assess whether proposed asset condition solutions are appropriately scoped and cost-effective. Avangrid understands this concern and believes that embedding an independent asset condition reviewer role within ISO-NE will help to bridge that gap and allow states and stakeholders to have more confidence in asset condition investment decisions.

Looking ahead, New England faces substantial load growth with system peak demand potentially reaching 50 GW or more by 2050, alongside the integration of significant new supply resources. A large-scale expansion of the regional transmission system will be necessary to meet this demand and accommodate the evolving resource mix. This expansion must be guided by a holistic planning strategy. We believe that ISO-NE, if equipped with the necessary resources, can serve as a trusted, independent reviewer - thereby improving state and stakeholder confidence in the NETOs' asset condition investments. Additionally, we anticipate that such an arrangement will enable more holistic

transmission planning within New England by integrating the consideration of asset condition needs with other regional transmission planning processes.

Avangrid views ISO-NE's role as a non-decisional technical expert and advisor to the NETOs, the states, and regional stakeholders. ISO-NE would provide independent assessments of asset condition needs and proposed solutions (in a format to be determined). The NETOs would still retain the right to make decisions on whether, when and how to move forward with asset condition solutions, and the liability associated with such decision-making. The ISO-NE role would be advisory and intended to result in well-vetted, non-controversial outcomes.

We thank the New England States, NESCOE staff and ISO-NE for your ongoing engagement on these issues and hope to be able to move forward expeditiously with the detailed scoping of an independent reviewer role within ISO-NE.