



May 2, 2025

To: New England States Committee on Electricity (NESCOE), Managers and Staff
ISO New England (ISO-NE)
Planning Advisory Committee (PAC)

From: Eversource Energy

Subject: Asset Condition Reviewer and Eversource Underground Cable Modernization Program

Eversource appreciates the feedback and engagement from the New England States and stakeholders on enhancements to the transparency and review of asset condition projects over the past two years, as well as the feedback provided more recently on Eversource's February 26 presentation regarding the Underground Cable Modernization Program. We are providing this memo to 1) confirm and memorialize Eversource's support for an independent reviewer for asset condition projects and 2) provide an update on Eversource's revised plans for further PAC presentations regarding the Underground Cable Modernization Program.

Asset Condition Reviewer

Asset condition projects include a wide variety of investments that are critically necessary to ensure the ongoing safety and reliability of the New England transmission system. Many of our transmission facilities are aging and require ongoing investments to ensure that we can continue to deliver reliable and cost-effective power to our customers. Since 2023, Eversource and the other New England transmission owners have developed and implemented many enhancements to the processes for transparency and stakeholder review of asset condition projects. Process enhancements include additional PAC presentations for asset condition projects, opportunities for stakeholder input and written responses from the transmission owners, development of the Asset Condition Process Guide, publication of a database with age and inspection information for major transmission equipment, and development of a longer-term (approximately 5-year) forecast of anticipated asset condition projects. Many of these enhancements were modeled on ISO-NE's transparent planning processes.

As a result of these enhancements, stakeholders now have a great degree of visibility into the key decisions affecting the scope and costs of asset condition projects and opportunities for input on these projects while they are still in the planning stages. In the future, these enhancements may also support the consideration of opportunities to “right-size” planned projects to meet projected future load growth in a cost-effective manner, though processes for making right-sizing decisions have yet to be developed.

Eversource has also heard and considered requests from the New England States and stakeholders to establish an independent reviewer for the proposed asset condition projects. After much consideration, Eversource supports the development of an independent reviewer.

Given potential overlap between asset condition needs identified by the transmission owners and regional transmission needs identified by ISO-NE, as well as ISO-NE’s demonstrated technical and regional expertise, independence, and objectivity, Eversource believes that ISO-NE is best suited to serve as a qualified independent reviewer. ISO-NE already possesses a great deal of expertise in managing regional transmission planning processes that are transparent, holistic, responsive to feedback, and designed to ensure reliability and efficient markets at the lowest possible cost. We suggest that the ISO’s primary responsibilities with respect to asset condition projects could be to provide technical expertise and serve as an advisor to the transmission owners, the New England States, and regional stakeholders, and we are committed to working with all parties to develop and implemented the associated processes. The ISO should not bear the liability associated with key asset condition project decisions, as such liability would add significant costs and challenges while interfering with the TOs’ obligations to provide safe and reliable service to our customers under various laws and regulations.

We look forward to further discussions with ISO-NE, the New England States, and stakeholders about this important topic, including at the upcoming NECPUC Symposium.

Underground Cable Modernization Program

At the February 26 PAC meeting, Eversource provided an overview of our UCMP in Eastern Massachusetts. Today, our transmission system in the Boston area consists primarily of aging underground transmission lines, some of which are over 60 years old and based on legacy technologies that are being discontinued across the industry. The reliance on aging infrastructure poses serious safety and reliability risks, as well as environmental concerns for our customers and the communities we serve.

As part of the February 26 presentation, we identified a subset of our Eastern Massachusetts underground circuits that we are planning to rebuild and convert from High

Pressure Fluid-Filled (HPFF) pipe-type cables systems to Cross-Linked Polyethylene (XLPE) cable systems over the next 10 years.¹ These projects represent the first phase of Eversource's plans to transition the Boston-area Pool Transmission Facility (PTF) underground cables to XLPE, with the entire transition expected to stretch into the 2040s. We provided the presentation to meet a commitment made to NESCOE and PAC in 2023 and to ensure that ISO-NE and the PAC had a complete picture of our planned PTF asset condition projects arising from the UCMP in the Boston area. As part of the February 26 PAC presentation, we also stated that we planned to provide a follow-up presentation to PAC this summer.

In response to feedback received after the PAC meeting and following discussions with ISO-NE, we now plan to defer our planned follow-up PAC presentation. Consistent with the March 18 letter from the New England States,² we are requesting that ISO-NE review the program and provide input on the prioritization and scoping of our projects. If any projects require near-term PAC presentations to address urgent issues, we will present these projects to PAC along with further information supporting the need for an accelerated timeline. In the meantime, we will continue to perform preliminary design and cost estimation work for the UCMP in order to provide ISO-NE and the PAC with a more accurate estimate of the total cost of the first phase of the program. At this time, we expect the total cost of this phase to the region to fall between approximately \$2 and \$3 billion, which will be spread out over the next decade.

Additionally, all questions and comments received following the February 26 PAC presentation will be posted to the PAC webpage next week, along with our responses. We thank the New England States, NESCOE, and stakeholders for your feedback on these projects and look forward to further discussions.

¹ All of the projects listed in the February 26 PAC presentation are on Pool Transmission Facilities (PTF). Eversource's plans to convert our non-PTF cable systems from HPFF to XLPE are described on our Local System Plan.

² See <https://nescoe.com/resource-center/letter-to-nolan-underground-cable-program/>