

February 27, 2024

To Eversource, ISO-NE and the PAC,
the X-178 line replacement project is not an asset condition project.

“Asset Management refers to projects and activities that ‘encompass the maintenance, repair, and replacement work done on existing transmission facilities’ which “may result in an incidental increase in transmission capacity that is not reasonably severable from the asset management project or activity, and . . . is [not] subject to the transmission planning requirements.”

https://www.iso-ne.com/static-assets/documents/2023/03/ad22-8_iso-ne_post-tech_conf_comments.pdf

No structures need to be replaced or repaired until the next maintenance cycle (2033) when less than a tenth of the structures may need replacement or repair.

The planned X-178 rebuild is unnecessary and not severable from the stringing of the OPGW, alone or with the 1272 ACSS conductor. It is the nadir of asset condition corruption: “Lack of regulatory oversight... creating a perverse incentive for NETOs to pursue asset condition spending disproportionately, unnecessarily, and/or exorbitantly.”

The PAC does not have the authority to hear this presentation and legitimize the X-178 as an asset condition project.

Eversource needs to pull this egregious project.

ISO could not approve a TCA for the costs of the X-178, which not an asset condition or reliability project.

ISO needs to review the Eversource “asset condition” projects for which is has approved TCAs, in light of the structure condition misrepresentation by Eversource that can no longer be ignored, now that structure condition information is being supplied, albeit in a crude form, by Eversource.

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