



Responses to Stakeholder Comments on Draft RSP Project List and Asset Condition List March 2025 Update

Comments from Ariella Fuzaylov, Synapse Energy Economics, Inc.¹

Comment 1

Synapse submits this memorandum as part of our role representing client interests at NEPOOL. Synapse is a leader for public interest and government clients in providing rigorous analysis of the electric power sector. At NEPOOL specifically, we represent consumer advocates throughout New England to ensure ratepayers receive reliable and affordable energy as we transition to a clean and sustainable grid.² We want to thank the ISO for the March 19, 2025, presentation on the [RSP Project List and Asset Condition List Update](#). The data and visualizations shared are informative and valuable for tracking transmission infrastructure trends across the region.

To support a more comprehensive representation of transmission spending trends, we respectfully request that ISO-NE provide the charts and underlying data for the following slides, extended back to 2016—the year when detailed cost reporting and project tracking for these categories first became available. Additionally, we respectfully request that ISO-NE include all projects proposed to the PAC:

Slide 8: Cumulative Investment of New England Transmission Reliability Projects through 2033

Slide 19: Cumulative Investment of New England Asset Condition Projects through 2033

Slide 20: Cumulative Investment of New England Transmission Reliability Projects and Asset Condition Projects through 2033

If there are any confidentiality or formatting considerations with the data, we are happy to accommodate reasonable alternatives.

We are also concerned that the information presented on asset condition projects underrepresents anticipated costs. It is our understanding that the ISO only includes asset condition projects in the Asset Condition List (ACL) and graphs like those seen on slides 19-20 when they are in proposed, planned, under construction, and in service stages. However, many expensive projects that Transmission Owners present at PAC are not incorporated into the ACL. For example, recently proposed asset condition projects related to HPFF in the Boston area could total \$1.6 – \$1.8 billion spend over the next 10 years. The

¹ Submitted by Ariella Fuzaylov via email on April 3, 2025.

² Synapse also represents the Vermont Energy Investment Corporation (VEIC) and PowerOptions, Inc.

region will see substantial transmission cost increases due to these projects, yet the ISO's presentation ignores them entirely. Therefore, we request that the ISO incorporate all presentations that have been previously proposed at the PAC into their ACL and ACL presentations going forward either under the category "concept" or a new category as needed. If there are complications with adding these projects into the cost estimates on the slides listed above, we request clarification on why projects presented to the PAC are not able to be included in these estimates.

We look forward to your response and appreciate your continued transparency in system planning efforts.

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Calculating Costs for In-service Projects by Year

The current versions of slides 8, 19 and 20 are meant to show the expected cost of transmission additions in the future years and including additional information on past investments has the potential to make the chart unreadable. However, if Synapse is looking for annual investments in Reliability Projects and Asset Condition Projects between 2016 and 2033, this information can be retrieved in the RSP project list and Asset Condition List through simple sorting and filtering functions.

For example, to retrieve the total investments in Reliability Projects in 2019, open the 'RSP_sortable' tab of the draft March 2025 RSP project list (draft_RSP_Project_List_Mar2025.xlsx), sort and filter column H (Projected In-Service Month/Year, select 2019), column BB (Mar-25 Status, select 'In-Service'), column CW (Mar-25 Estimated PFT Costs, remove 'NR'), the total costs in Column CW is \$178.96M, which is total investment in Reliability Projects in 2019.

Similarly, to retrieve the total investment in Asset Condition Projects in 2019, open the 'ACL_sortable' tab of the draft March 2025 Asset Condition (draft_Asset_Condition_List_Mar2025.xlsx), sort and filter column H (Projected In-Service Month/Year, select 2019), column AL (Mar-25 Status, select 'In-Service'), column BP (Mar-25 Estimated PFT Costs, remove 'NR'), the total costs in Column BP is \$529.686M, which is total investment in Asset Condition Projects in 2019.

Additionally, the Regional System Plans typically include transmission investments by year, starting well before 2016, (See Figure 5-2 and Figure 5-3 of the 2023 Regional System Plan³) and these would also be a good source of information on transmission investments.

³ https://www.iso-ne.com/static-assets/documents/100005/20231114_rsp_final.pdf

Thresholds for Including Projects on the Asset Condition List

For a project to be included on the Asset Condition List, the project must be presented to PAC as one being considered to address an asset condition issue. If a project is presented to PAC without costs, it is added to the Asset Condition List as a “Concept” project with a blank entry for the associated cost. For the cost of any project to be included on the Asset Condition List and in the graphs that show total investment in New England, the cost for the project must be presented to PAC.⁴ After the project costs are provided to PAC, the project moves to “Proposed” or “Planned” and the graphs will reflect these costs.

For the specific example related to the [proposed asset condition projects related to HPFF in the Boston area](#), the reason it was not included in the March project listing update is due to timing.

For the March 2025 update, the data was being gathered in January 2025 and given that Eversource presented this project at the February PAC, the project information was not available. Additionally, the February PAC presentation by Eversource did not include the project specific costs.⁵ These projects will remain as “Concept” on the Asset Condition List until the next Asset Condition List update cycle after project specific costs have been presented.

In summary, because project specific costs are not known for Concept project, the ISO does not plan on modifying the threshold for including projects in the graphs that show total investments.

⁴ The ISO requires a single cost value, rather than a range.

⁵ The \$1.6 - \$1.8 billion value provided in Synapse’s comment seems to be based off the use of average per mile costs that were provided by Eversource. However, as Eversource notes in the presentation, accurate estimates require detailed engineering on an individual project basis. As a result, cost estimates will be developed for individual UCMP projects and presented to PAC when available.