NESCOE
New England States Committee on Electricity

To: **ISO-NE**
From: **NESCOE** *(contact: Dorothy Capra)*
Re: **2050 Transmission Study Comments**
Date: **May 6, 2022**

Background

On April 14, 2022, ISO-NE presented to NESCOE interim results of the *2050 Transmission Study*. At the end of the presentation, ISO-NE asked for NESCOE feedback on several items. This memo is in response to that request.

Response to Questions

Below is the response to each question ISO-NE presented, along with an additional request.

1) **Which 51 GW 2050 Winter Evening Peak sensitivity (with or without wind relocation) should be used as the basis for the primary set of solutions?**

   The question that comes to mind is "How feasible is this wind relocation?" If this is really a feasible option, then relocating the wind seems to be the obvious way to start on developing solutions. On the other hand, if this is just a way to make a problem smaller but really can't be done then we shouldn't be considering it.

2) **Is the ISO's overall approach to solutions development reasonable?**

   Yes, the overall approach is reasonable.

3) **Is there a desire for solutions to overloads in the original 2050 Summer Daytime Peak snapshot (rather than the 2050 Summer Daytime Peak Sensitivity)?**

   No, there is not a desire to develop solutions for the original snapshot.

4) **Is the use of per-mile cost assumptions acceptable for certain upgrades?**

   This assumption seems reasonable, especially for reconductoring or line rebuilds for which there is experience and costs are well-known.

5) **What is the level of detail expected for cost estimates?**

   Detailed cost estimates would be especially useful for facilities where costs may not be well-known, which could include those in need of an upgrade of voltage level or that are in a shared right of way. For most or all other facilities, excepting any lines having construction peculiarities or that are of particular interest to stakeholders, the use of per-mile costs to produce generalized estimates would be acceptable so as to not unduly increase the time and expenditure required to complete the estimation work. It should be

a shared goal of NESCOE and ISO-NE to avoid wherever possible the potential for onlookers to confuse precision for accuracy, or prognosis for certainty.

We appreciate ISO-NE's work on the study and the request for feedback. We'd like ISO-NE's help with one other important aspect of the preliminary study results. We request that ISO-NE investigate the possibility of estimating the duration of overloads, especially on those lines where it appears that overloads could be transient. Upgrading a line to avoid a short overload is likely not the most economic solution for consumers. Please let us know if talking through the overload duration open question would be helpful.