



New England States Committee on Electricity

To: ISO-NE
From: NESCOE Staff (Contact: Nathan Forster)
Date: August 30, 2023
Subject: Draft 2023 Regional System Plan Feedback

NESCOE appreciates the opportunity to provide feedback on ISO-NE’s draft 2023 Regional System Plan (the “2023 RSP”). NESCOE also appreciates that ISO-NE has made several improvements to the 2023 RSP that have improved its clarity and ease of reading, such as the helpful summary of state and federal initiatives in section 2.

Consistent with ISO-NE’s request, NESCOE submits feedback on the form that ISO-NE provided to ease its review. NESCOE did not, however, provide detailed feedback on the draft 2023 RSP in connection with Asset Condition Projects. Rather, we recommend that ISO-NE substantially rework the draft 2023 RSP discussion of that subject matter for several reasons.

First, the draft 2023 RSP refers to several NESCOE communications on the subject that are not especially relevant. In particular, section 5.2.9 of the RSP references a short memo in 2022 identifying the need for going-forward resource allocation and a very short power point in 2023 reviewed at a Planning Advisory Committee meeting for the purpose of spotlighting the need for discussion. At the same time, the 2023 RSP omits NESCOE’s material communications and requests on Asset Condition Projects and processes posted to the Planning Advisory Committee in February 2023 and in July 2023. Those documents explained the need to enhance asset condition project visibility and projections, justification processes, project cost accuracy, and, ultimately, solutions. The July 2023 memorandum also made specific recommendations to New England Transmission Owners, such as to:

1. develop asset condition project spending plans that include one-, two-, and five-year forecasts
2. work with ISO-NE to develop and maintain an asset condition database that will include all information necessary to guide and inform holistic asset condition prioritization and decision-making
3. provide a description of how select asset condition projects could support rightsizing
4. develop an asset condition and guidance document that will promote a more criteria-based decision-making approach to asset condition projects
5. make certain improvements to the process for stakeholder review of proposed asset condition projects

Second, the 2023 RSP should note that substantial efforts on rightsizing should not occur until the region makes sufficient progress on reforms to its asset condition processes to increase transparency and predictability. Rightsizing is an important part of holistic planning that will allow for efficient transmission investment at the pace and scale needed for the region’s clean

energy future. However, New England needs enhanced fundamental asset condition processes before it can effectively address rightsizing concerns.

Finally, the 2023 RSP should include additional data on asset condition projects as well as reliability projects. The purpose of the RSP is, in material part, to provide an outlook on system planning. Therefore, the RSP should include significant data and discussion relative to asset condition projects, which today are the most significant component of consumer investment in transmission infrastructure.

Thank you again for the opportunity to provide feedback on the 2023 RSP. Please feel free to contact us with any questions.