



New England States Committee on Electricity

To: New England Transmission Owners (NETOs)
From: NESCOE Staff (Contact: Sheila Keane)
Date: October 20, 2023
Subject: Asset Condition Process Improvements – Asset Condition Database
CC: ISO-NE; Planning Advisory Committee (PAC)

NESCOE appreciates the opportunity to provide feedback on the NETOs’ proposed “PTF Asset Condition Database” (Proposed Database), presented to the PAC on September 20, 2023.

In July 2023, NESCOE requested that the database provide information necessary to guide and inform holistic asset condition prioritization and decision-making. NESCOE identified four components that should be included in a PTF Asset Condition Database: major PTF assets, asset health score, planned comprehensive assessment schedule, and cost projections (for 15 years).¹ We appreciate the NETOs’ ongoing efforts to respond to our requests, including the Proposed Database.

In general, we find that the Proposed Database is largely responsive to our ask, with one exception – cost projections. The goal of the requested asset condition process reforms is to improve the transparency, predictability, and cost discipline of asset condition projects. A longer-term understanding of likely timeframe and cost for expected projects provides important information necessary to prioritize and guide future investment and improve predictability of project costs and timeframes. Accordingly, NESCOE requests that the NETOs add cost projections as an explicit component of the second phase of work underway for 2024. If the NETOs believe that it is not possible to provide the requested cost projections, then they should provide a clear explanation, along with other possible approaches to improve predictability of project costs.

NESCOE requests that, as part of the second phase, the NETOs provide information on all major PTF assets within each substation (circuit breakers, control houses, etc.) as these can combine to drive significant substation upgrade costs. This information together with the transmission line and transformer asset data will result in a database that reflects the overall condition of New England’s PTF assets.

NESCOE looks forward to continued dialogue on this important initiative to improve New England’s asset condition project processes to ensure preservation of regional reliability in an affordable manner. Progress on these reforms will set the foundation to commence discussions about right-sizing and sensible, holistic planning.

¹ NESCOE. *Asset Condition Process Improvements – Next Steps* (July 2023), at <https://nescoe.com/wp-content/uploads/2023/07/Asset-Cond-NETO-Requestsf-7.14.23-.pdf>.