

March 18, 2025

Joseph R. Nolan, Jr.
President & Chief Executive Officer
Eversource Energy
800 Boylston Street
17th Floor
Boston, Massachusetts 02199

Dear Mr. Nolan,

The New England States Committee on Electricity (NESCOE) appreciates Eversource’s February 26, 2025 presentation to the Planning Advisory Committee on its proposed Eastern Massachusetts Underground Cable Modernization Program (UCMP). As you know, New England ratepayers have steadily invested in the region’s electric power grid over many decades. As the system ages, needs evolve, and demand grows, NESCOE continues to prioritize reliable service at the lowest cost to ratepayers over the long term. For the reasons set forth below, NESCOE asks that you pause implementing any nonurgent, time-sensitive project components of this program to allow for a holistic, regional planning discussion about Eversource’s proposed overhaul of the transmission network serving New England’s largest load center.

Through the UCMP, Eversource proposes a phased replacement of nearly all—179 of 191 miles—underground transmission lines in the Boston area. NESCOE’s request to pause implementation allows the region (1) to understand the underlying reliability needs with the benefit of ISO-NE’s planning expertise, (2) to have an opportunity to explore alternative program elements and configurations, (3) to manage the pace of investment, (4) to maximize the value to ratepayers, and (5) to also meet the important objectives of the UCMP.

Underground infrastructure is complex and costly. Although Eversource did not provide cost estimates in February, NESCOE estimates ratepayer costs for the total program could be in the \$8 to \$9 billion range based on recent similar cost estimates.¹ NESCOE encourages Eversource to provide the UCMP capital spending and cost projections in the nearest term, which would allow NESCOE and other stakeholders to correct their estimates, if corrections are appropriate. Consumer cost projections for such a massive investment are necessary for states and stakeholders to understand the project, as are any updates as cost information changes.

Given the sheer magnitude of this investment, it would be inappropriate to begin making investments pursuant to the UCMP without conducting a holistic, regional planning process that would ensure that the region’s needs are met at the lowest possible cost to ratepayers in the long

¹ Eversource notes “recent cost estimates for 115kV double-circuit underground ductbank in urban areas range from \$46 M to \$51 M per mile.” Presentation at 2. NESCOE recognizes the challenges associated with underground work in urban areas such as Boston and realizes that the cost per mile for UCMP may be even higher than these estimates.

term. Planning for this project should align with, and have the characteristics of, ISO-NE's planning process and thereby be: transparent, holistic, responsive to feedback, guided by ISO-NE's independent planning expertise, and designed to meet power system needs at the lowest ultimate cost to consumers.

There appears to be time for such considered planning. In August 2023, Eversource publicly indicated its intent to replace its underground cables in a prioritized manner.² At the time, Eversource said that it expected to begin a regional discussion of its planned program that year.³ A year and a half then passed without any further discussion of the UCMP. In February 2025, Eversource presented the UCMP to ISO-NE, states, and stakeholders for the first time. Eversource said that its proposed Phase I projects were only conceptual and subject to change, and that details and cost estimates were still in development.⁴

NESCOE recognizes Eversource's important role and its responsibility to proactively monitor and maintain aging transmission infrastructure to ensure the reliability of New England's bulk electric system. To be clear, if Eversource believes that action is necessary this year on any specific UCMP project elements to protect against near-term reliability risks, it should promptly present evidence of the severity of the risk and its timing, and when those elements were identified as such.

Eversource is aware that ISO-NE is conducting its required reliability assessment of the Boston area⁵ and that ISO-NE has identified various time-sensitive reliability needs. ISO-NE is continuing to assess possible non-time-sensitive needs. In its February 2025 presentation, Eversource stated that it will prioritize the UCMP project elements to avoid potential duplicative transmission investments that ISO-NE's Boston Needs Assessment identifies. Respectfully, this is not enough. Consumer confidence in the reliability of our power system—and that it will be sustained over the long term at the lowest possible cost—requires more than a statement that Eversource will unilaterally plan to avoid duplicative investment. States and stakeholders need ongoing visibility into, and an opportunity to provide feedback on, Eversource and ISO-NE's plans to avoid duplicative investment. The region will also need to avoid duplicative investment in the context of other transmission needs that may arise in the greater Boston area during the UCMP horizon. ISO-NE will continue to assess those longer-term needs under its current tariff and as required under FERC Order No. 1920. We know that you understand the complexity of, cost of, and public disruption resulting from digging up streets in greater Boston. Bringing visibility to the evaluation and decision-making processes will also help to assure the public that the related projects are indeed being stewarded to minimize costs and disruptions.

² https://www.iso-ne.com/static-assets/documents/2023/08/a05_2023_08_16_pac_17041722_hpff_letter_to_nescoe.pdf

³ https://www.iso-ne.com/static-assets/documents/2023/08/a05_2023_08_16_pac_17041722_hpff_letter_to_nescoe.pdf

⁴ https://www.iso-ne.com/static-assets/documents/100020/a05_2025_02_26_pac_eastern_massachusetts_underground_cable_modernization_program.pdf

⁵ 2032/2033 Boston needs assessment

Putting aside urgent infrastructure replacement needs, states and stakeholders rely on ISO-NE's transparent planning process, which requires ISO-NE to solicit and consider stakeholder feedback as it identifies the most cost-effective options.⁶ The value of that planning process for ratepayers is evident: ISO-NE regularly modifies its need and solution studies based on state and stakeholder input. This process yields a better overall outcome for the system and for the ratepayers who ultimately pay for the investments. The same would be true for the UCMP. In fact, the scale of the UCMP makes it ideal for the region, with the help of ISO-NE's ratepayer-funded technical expertise, to explore and (as appropriate) pilot innovative solutions including grid enhancing technologies and dynamic line ratings in resolving these needs.

NESCOE respectfully requests a conversation with Eversource that includes ISO-NE, Public Utility Commissioners, consumer advocates, and other stakeholders about the best way forward for ratepayers and suggests that the New England Conference of Public Utilities Commissioners Symposium in May 2025 may be a convenient venue for such conversations. Please have your staff let NESCOE staff know of your willingness to engage in such a conversation at your earliest convenience.

Sincerely,

Katie S. Dykes

Katie S. Dykes
Commissioner, Department of Energy and Environmental Protection
State of Connecticut

Philip Bartlett

Philip L. Bartlett II
Chairman, Public Utilities Commission
State of Maine

Jason Marshall

Jason Marshall
Deputy Secretary and Special Counsel for Federal and Regional Energy Affairs
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Jared Chicoine

Jared Chicoine
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Dan Phelan

Dan Phelan
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⁶ Open Access Transmission Tariff, Attachment K, § 2.2.

Ron Gerwatowski

Ron Gerwatowski
Chairman, Public Utilities Commission
State of Rhode Island

Chris Kearns

Chris Kearns
Commissioner, Office of Energy Resources
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