



New England States Committee on Electricity

**To: Planning Advisory Committee**  
**From: NESCOE (Contact: Sheila Keane)**  
**Date: June 9, 2025**  
**Subject: Asset Condition Reviewer Priorities**

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NESCOE appreciates the ISO-NE Board of Directors' recent expression of openness to performing the critical role of Asset Condition Reviewer (the Reviewer), subject to conditions that NESCOE believes are reasonable.<sup>1</sup>

NESCOE writes to share the priorities against which it will assess the Reviewer's proposed duties, structures and processes. NESCOE hopes that the priorities are helpful to ISO-NE as it works on a preliminary framework to enable the stakeholder process to get underway and to stakeholders as they help to shape the Reviewer's duties and processes. NESCOE has discussed these priorities with New England Consumer Advocates, who have long shared NESCOE's concerns and sharp focus on New England's Asset Condition Projects and associated processes.

The need for change is urgent. NESCOE looks forward to working with ISO-NE, consumer advocates, transmission owners, and other stakeholders to execute change in the nearest term.

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### **Asset Condition Reviewer Principles**

1. Provide states and stakeholders with an independent, objective review of asset condition project proposals, including the identified needs (e.g., end of life, system needs, timing of project), the base proposal, potential alternatives, and costs.
2. Use clear, objective, and transparent criteria, including uniform, published standards for determining asset health as well as asset replacement design standards.
3. Begin its review early in the process so as to not delay development but also allow time for course correction based on feedback from the Reviewer, states, consumer advocates, and stakeholders.
4. Review at a level that is appropriate relative to the scale, scope, and cost of the proposed investment.

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<sup>1</sup> [https://www.iso-ne.com/static-assets/documents/100023/iso\\_memo\\_acr\\_5\\_15\\_2025.pdf](https://www.iso-ne.com/static-assets/documents/100023/iso_memo_acr_5_15_2025.pdf)

5. Assess and communicate with NETOs, states, consumer advocates, and stakeholders about project costs, cost implications over the long-term, and cost changes and trends over time.
6. Maintain independence.
7. Possess technical expertise and have access to complete project information in a timely manner.
8. Produce real, actionable information that state officials and others could use in either supporting or challenging a project if needed.
9. Review rightsizing and broader planning intersections once those processes are developed.
10. Be designed and implemented as soon as possible following a robust stakeholder process, given the urgent need for oversight.