



New England States Committee on Electricity

To: National Grid
From: NESCOE (Contact: Sheila Keane)
Date: September 10, 2026
Subject: E-205E and E-205W 230kV Line Asset Condition Replacement
Cc: ISO-NE; Planning Advisory Committee (PAC)

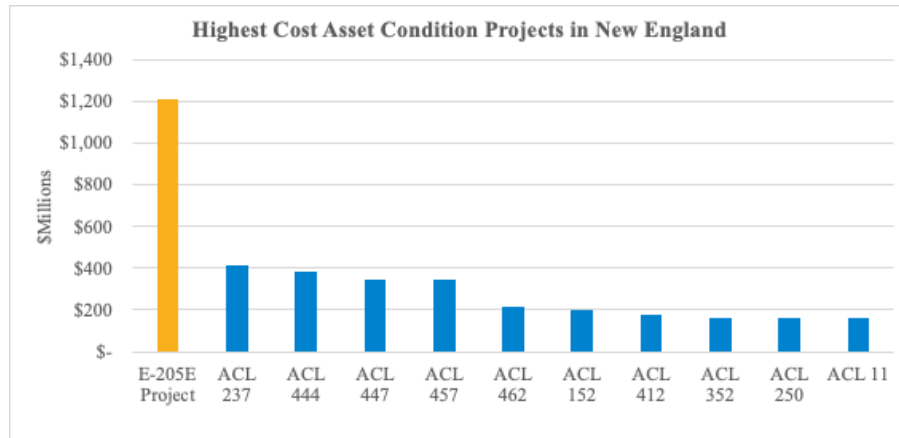
NESCOE writes regarding National Grid’s proposed E-205E and E-205W 230 kV Line Asset Condition Replacement project, which National Grid presented at the August 26, 2026, Planning Advisory Committee (PAC) meeting.¹ National Grid proposes to fully rebuild the lines and replace all existing 230 kV structures with new 345 kV structures for an estimated cost of \$1.2 billion. National Grid asserts that this project represents a “generational opportunity” to right-size transmission facilities, which would benefit interconnecting facilities and support a future increase in interregional transfer capacity.

For the reasons outlined below, NESCOE requests that National Grid work with ISO-NE to ensure that this proposed project is fully reviewed by the Asset Condition Reviewer (ACR). NESCOE further requests that, should National Grid wish to include right-sizing as a possible viable solution alternative, additional analysis and information should be provided to ISO-NE, states, consumer advocates, and stakeholders.

This project represents the single largest proposed investment prompted by asset condition needs in New England history. Even the base alternative, intended to address known asset condition needs in the most targeted manner (which National Grid apparently does not prefer), is nearly double the size of any single previous investment. National Grid’s proposed project costs four times as much as the region’s anticipated spending on reliability projects over the next 10 years and would increase the total costs of planned asset condition projects by 23%.²

¹ https://www.iso-ne.com/static-assets/documents/100038/a2.3_e-205_acr_pac_presentation_2026.pdf.

² The most recent data published by ISO-NE forecasts \$5.3 billion in spending on asset condition projects in the future, compared to just \$281 million in reliability projects. Final Asset Condition List – June 2026 and Final RSP List – June 2026, available at <https://www.iso-ne.com/system-planning/system-plans-studies/rsp/rsp-project-list-and-the-asset-condition-list>.



As National Grid knows, the growing costs of planned asset condition projects are precisely why NESCOE worked with National Grid and other transmission owners (TOs), ISO-NE, consumer advocates, and stakeholders to improve transparency and oversight of proposed asset condition projects over the last three years. The work culminated with the recent August 17, 2026, filing of ISO-NE’s ACR proposal with the Federal Energy Regulatory Commission (FERC). National Grid was a collaborative and productive participant in developing the ACR proposal. National Grid’s decision to bring forth this proposed \$1.2 billion asset condition project at this moment – a little more than a week after the ACR filing – raises the very real prospect that the unprecedented project, despite its staggering cost, would evade any asset condition review.

NESCOE acknowledges that National Grid expressed openness after the stakeholder discussion at PAC to have this project reviewed by the ACR. Nevertheless, National Grid has been developing this project for at least two years, since presenting it in concept to the PAC in 2024.³ Yet, National Grid did not put forth the project as a candidate for interim review, when ISO-NE worked with the TOs to identify projects of \$100 million or more last year.⁴ Further, major construction is not expected to begin until late 2031 – five years from now.⁵ There appears to be time and opportunity in the schedule for National Grid to have ensured that this project be subjected to review. If National Grid’s analysis shows that is not the case, it needs to detail the reliability-based urgency and timing choice that landed the largest proposed asset condition project in New England’s history in this brief window after the interim project review selection process and immediately before ISO-NE’s permanent ACR process is in place.

This proposed project must be subject to a complete asset condition review process.

³ https://www.iso-ne.com/static-assets/documents/100010/a04_2024_04_18_pac_es_e205_acr_presentation.pdf.

⁴ https://www.iso-ne.com/static-assets/documents/100028/a04_pac_acr_presentation.pdf.

⁵ PAC guidelines require that projects come to PAC at least 6 months before major construction. *See*: Asset Condition Process Guide – Appendix D, Nov. 2024, available at https://www.iso-ne.com/static-assets/documents/100018/acpg_v1_appendix_d.pdf.

NESCOE is also concerned that National Grid's preferred alternative is to right-size the line. To be clear, NESCOE does not oppose right-sizing and in fact supports sizing projects to maximize the value and minimize overall costs to consumers over the long-term. However, NESCOE has been clear from the outset that a regional right-sizing approach requires in the first instance confidence that the underlying project is warranted and reasonable. In this case, it is not possible to come to that conclusion absent a complete review of the proposed project by the ACR.

The region has yet to develop a process by which the costs and benefits of right-sizing opportunities can be evaluated. Such an evaluation is necessary to determine whether right-sizing is reasonable. National Grid did not provide any analysis to support its assertion that this is a "generational opportunity."⁶ In this case, National Grid's proposed right-sizing represents an increase in cost of 60%, or \$455 million, over the base alternative. Put in context, the increased costs for right-sizing alone far exceed the cost of any single asset condition project to date.

Given the overall scale of the project and the magnitude of cost increase to right-size, it is imperative that National Grid provide sufficient information to ISO-NE, states, consumer advocates, and stakeholders to enable an informed opinion on whether and what level of investment is warranted. This includes, but is not limited to:

- A quantification of costs and benefits of operating the line at 345kV
- A description and cost estimate of any necessary additional upgrades in both NY and MA that would be needed to operate the line at 345 kV
- Analysis supporting any identified transfer increases
- A description of the condition of the NY line facilities, any planned or proposed construction on the line in NY, and the timing of that construction
- An alternative that considers conducting the work in a staggered approach (e.g., replacing the transmission towers with 345 kV capable towers, but holding off on replacing the conductor until the line in NY is closer to operating at 345kV)

NESCOE looks forward to continued discussions on this matter.

⁶ https://www.iso-ne.com/static-assets/documents/100038/a2.3_e-205_acr_pac_presentation_2026.pdf.