



Advancing the Clean Energy Future

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VIA EMAIL

Fatou Dieng
Manager, Transmission Planning
Al McBride
Vice President, System Planning
ISO New England
One Sullivan Road
Holyoke, MA 01040-2841

Dear Ms. Dieng and Mr. McBride,:

Thank you for the invitation to submit these comments as ISO New England's continues to develop an independent, advisory Asset Condition Reviewer (ACR) to review transmission owners' (TO) asset condition projects (ACPs) with respect to need, technical credibility, possible alternative solutions, and cost-effectiveness. Specifically, the ISO has invited comments on its proposal to limit ACR review to ACPs with a project cost of \$30-\$50 million and "guardrails" to ensure adherence to adopted threshold rules.

The ISO agreed to develop and implement the ACR in response to growing concerns about the cost of ACPs and regional calls for the creation of an Independent Transmission Monitor (ITM). Acadia Center is among those who advocated for the creation of an ITM, not just to review the estimated \$11.9 billion cost of the ACPs on the most recent asset condition list (November 12, 2025, the "October 2025 ACL Update"), but also to coordinate the ISO regional system planning process under the Regional System Plan (RSP) and proposed TO upgrades of aging transmission infrastructure in existing rights of way via ACPs. Acadia Center believes that such coordination is crucial to the efficient, cost-effective development of the transmission capacity the region will need to meet system demand in 2050, as forecasted in the ISO's 2050 Transmission Study. While the ACR role is currently proposed to focus exclusively on the scope and cost of ACPs, rather than to coordinate and rationalize RSP and ACP planning, Acadia Center is hopeful that the ISO will adapt the ACR role as needed to look across transmission planning processes to ensure the development of needed aggregate transmission capacity at least cost and, should TOs prove unresponsive to the ACR's identification of deficiencies in proposed ACPs, consider mechanisms to enforce compliance with established ACR review standards.

The October 2025 ACL Update consists of 53 ACPs that are planned or proposed, with an aggregate cost of \$2,876,378,113. Evaluating the percentage of that total \$2.9 billion cost that is represented by a \$50 million project cost threshold, a \$30 million project cost threshold, and other potential thresholds, suggests an appropriate balance of ACR administrative burden and prudent ACP review. To arrive at its recommendation regarding the appropriate ACR threshold Acadia Center considered the number of projects and the dollar value of projects above the following thresholds:

- >\$50 million there are 10 planned/proposed ACPs (18.9% of such projects) totaling \$2,024,645,465 (70.4% of aggregate planned/proposed ACP spending; avg. \$202,464,547/project);
- >\$30 million there are 20 planned/proposed ACPs (37.8% of such projects) totaling \$2,466,319,030 (85.7% of aggregate planned/proposed ACP spending; avg. \$123,315,952/project);
- >\$20 million there are 25 planned/proposed ACPs (47.2% of such projects) totaling \$2,589,744,816 (90% of aggregate planned/proposed ACP spending; avg. \$103,589,793/project);
- >\$10 million there are 38 planned/proposed ACPs (71.7% of projects) totaling \$2,782,250,065 (96.7% of aggregate pending ACP cost; avg. \$73,217,107/project); and

Based on the above Acadia Center recommends the adoption of an ACP cost threshold of \$20 million. The adoption of a \$20 million threshold would require the review of 25 of the 53 planned/proposed ACPs scheduled on the October 2025 ACL Update (i.e. 47.2% or slightly less than half of such ACPs), that together account for 90% (\$2,589,744,816) of aggregate proposed/planned ACP spending.

With respect to an appropriate guardrail to protect against ACP-splitting, Acadia Center recommends the implementation of a process to ensure that the condition(s) requiring intervention on a portion of the subject transmission infrastructure don't also prevail on the balance of transmission infrastructure associated with an ACP. If it is determined that the condition(s) requiring intervention via an ACP do in fact prevail on the balance of transmission infrastructure associated with the proposed ACP, or if other condition(s) prevail on the balance of transmission infrastructure associated with the ACP that require intervention, then the ACR should recommend expansion of the scope of the ACP to avoid duplicating the cost of designing and implementing identical or additional solutions for associated infrastructure at a later date. The ACR can ensure complete, prudent ACP scoping by requiring TOs to provide certification of the assessment performed for each and every ACP, whether above or below the adopted project cost threshold. This would provide the ACR with the information it would need to (i) determine the extent of TO review of the subject infrastructure, (ii) require the evaluation of associated infrastructure if the certified TO review is, in the ACR's estimation, incomplete or inadequate, and to (iii) verify whether proper scoping places the cost of the project above the threshold for full ACR evaluation. This TO certification could be added as a requirement to Section 2 of the NETO Asset Condition Process Guide.

Thank you for your time and consideration. We look forward to remaining engaged with the ISO on this and other important issues relating to its operations, grid planning, and energy and capacity markets.

Sincerely,

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