

**To:** New England States Committee on Electricity (NESCOE)

**From:** New England Transmission Owners (Avangrid, Eversource, National Grid, Rhode Island Energy, VELCO, Versant Power)

**Date:** January 22, 2024

**Subject:** Response to October 20, 2023 Feedback on Asset Condition Process Improvements – Asset Condition Database

**CC:** ISO-NE; Planning Advisory Committee

Thank you for providing comments on the NETOs' PTF Asset Condition Database proposal. We appreciate the opportunity to work with NESCOE to provide the New England States and all stakeholders with useful information regarding our asset condition project planning.

We are pleased to hear that you find our proposed Asset Condition Database to be largely responsive to your request. We would like to take this opportunity to address certain specific requests contained in the October 20 feedback. First, regarding your request to include cost projections as part of the Asset Condition Database, please refer to the Asset Condition Project Forecast presented at the November 2023 PAC meeting, which includes information on potential future asset condition spending. Rather than duplicate this information in the database, the NETOs believe that the Asset Condition Project Forecast is the appropriate document for providing future cost projections and intend to update it annually. The Asset Condition Database includes information on all PTF lines and transformers, and, for the majority of these facilities, there are no current or planned asset condition projects. As such, we have not included cost projection information in the database, but we will look for opportunities to better align and clarify the information provided in each document in the future.

Second, while we acknowledge NESCOE's related request to provide a forecast of asset condition project spending up to fifteen years in the future, and we also acknowledge that there are reasons why such information would be of interest, the reality is that this data is not available. Development of a complete 15-year forecast would be based on overly broad assumptions, such as asset age and typical asset lives, and the resulting forecast would not provide accurate, meaningful information. As detailed in our forthcoming Asset Condition Guidance Document, asset condition projects primarily arise from regular physical inspections that identify issues that must be addressed in a shorter timeframe, in addition to detailed needs assessments that consider multiple solution alternatives. Also, many factors that go into providing accurate and meaningful cost estimates may fluctuate and change drastically in that timeframe, such as the full scope of identified asset condition needs<sup>1</sup>, project scheduling/sequencing and inflation of labor and material costs. Any fifteen-year cost projections we could derive would be largely speculative numbers and would not be consistent with the goal of providing accurate, meaningful information. The provided Asset Condition Project Forecast includes all projects and assets for which we can currently project potential spending.

Finally, we also acknowledge your request for information on other assets such as circuit breakers and control houses. At this time, the NETOs are providing information only on lines and transformers as

---

<sup>1</sup> For example, a full inspection is needed to determine whether an entire line needs to be rebuilt, or whether replacing a handful of poles and/or replacing conductors would solve the need for many years.

these assets drive the vast majority of asset condition project spending. We will explore adding additional information in the future.

We appreciate you providing your thoughts and we look forward to continuing to work together to provide information on asset condition project planning and to provide reporting that is most useful to the States and stakeholders.