

**ISO New England responses to questions submitted by Denis Bergeron, ME PUC, on December 16, 2015 regarding the UI Coast Flooding concerns.**

**For ISO:**

**1. When was the “Asset Management Key Study Area” section of the website created?**

The “Asset Management Key Study Area” section of the ISO’s website was created on July 9, 2015.

**2. Please explain why the ISO decided to create this page?**

There is a section in the Regional System Plan (RSP) where a list of projects associated with asset condition (asset condition projects) is shown. In the 2015 RSP, the asset condition projects from July 2014 to June 2015 are listed in Section 6.1 on pages 86-87. The compilation of this list required a search through each PAC agenda from the time the last RSP publication was made. To avoid this manual search in the future, the “Asset Management Key Study Area” section of the ISO’s website was created to collect and display all asset condition projects in one location.

As an added benefit to stakeholders, the creation of the “Asset Management Key Study Area” section of the ISO’s website and the display of all asset condition projects makes the topic of asset condition more transparent. In the past, these projects would be found on the day they were presented to PAC on the ISO website. Over a period of time it would be difficult to locate and to quantify the number of projects in this category. Now all of the asset condition projects are captured in one location.

**3. What guidelines are available to ISO staff for deciding what material or filings should be posted to this section?**

All asset condition projects that are presented to PAC are included in the “Asset Management Key Study Area” section of the ISO’s website. All asset condition projects with an estimated cost of \$5M and greater are presented to PAC. This threshold was selected to be consistent with the requirements to submit a TCA.

**4. Please identify under which sections of the tariff the United Illuminating filing falls.**

The United Illuminating (UI) Coastal Substation Flooding Needs Assessment<sup>1</sup> was presented to PAC on September 16, 2015. Asset condition is not an identified trigger for a Needs Assessment in Section 4.1(a) of Attachment K of the Open Access Transmission Tariff (OATT). Asset condition issues are issues that must be identified by the equipment owner and cannot be identified by the ISO. The concepts of upkeep as part of regional transmission service, how that gets paid for, etc. is covered at a high level in Section II.50, which points back to II.B and C, and the TOA. Those provisions contain language on the responsibility of TOs to upkeep the PTF RNS facilities, e.g. II.15.2 “ISO and PTO Responsibilities: As provided in the TOA and this OATT, the ISO and the PTOs will plan,

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<sup>1</sup> [https://smd.iso-ne.com/operations-services/ceii/pac/2015/09/a2\\_ui\\_coastal\\_substation\\_flooding\\_needs\\_assessment.pdf](https://smd.iso-ne.com/operations-services/ceii/pac/2015/09/a2_ui_coastal_substation_flooding_needs_assessment.pdf)

construct, operate and maintain the PTF in accordance with Good Utility Practice and their planning obligations in Attachment K in order to allow the ISO to provide the Network Customer with Regional Network Service over the PTF.” If poles need replacing, control systems are obsolete, etc., those are upkeep. Because assets being repaired or modified as a result of the operating condition of the facilities are already PTF, they already exist as PTF in the rates.

**5. Please describe the process and responsibilities of the Reliability Committee and the Planning Advisory Committee for this filing.**

The role of the Planning Advisory Committee (PAC) is described in Section 2.2 of Attachment K to the ISO New England Open Access Transmission Tariff (OATT). Consistent with the response to Question 4, the PAC has no formal role with respect to Asset Condition issues. However, in the interest of transparency, ISO New England has been requesting that Asset Condition issues be discussed with the PAC so that stakeholder feedback can be taken into consideration. Specifically related to Asset Condition issues, the RC would also provide the ISO with advisory input on any required Proposed Plan Applications where configuration changes are required, and/or on the Transmission Cost Allocation then the costs are anticipated to be greater than \$5M.

**6. Please provide a list or ask the TOs to provide a list of all existing transmission assets which are now within the new FEMA 100-year flood plain.**

ISO New England has requested this information from United Illuminating, Eversource, National Grid, New Hampshire Transmission, Emera Maine, VELCO, and Central Maine Power. Since United Illuminating has already presented this information to the PAC, the information is not repeated here. The information below is based on the information provided by each of the respondents and has not been independently verified by the ISO for accuracy.

United Illuminating – In addition to those presented, Milvon and Indian Well are also a concern that require further investigation.

National Grid – There are 5 substations at risk. However, only one of them, Webster Street, includes PTF equipment.

New Hampshire Transmission – No assets in the new 100 year flood plain.

Emera Maine – No PTF assets are in the new 100 year flood plain.

Central Maine Power – At this point CMP has done a preliminary review of a few substations. This review shows concerns at five stations. However, in addition to the fact that CMP has not reviewed all of its stations, no review has been done to establish whether the elevation of the water would be high enough to impact critical equipment at the five stations of concern at this time.

VELCO – Three stations are in the new 100 year flood plain, East Cable terminal, Florence, and Shelburne. A thorough review has not been performed, but a cursory review reveals that there is limited risk to PTF equipment.

Eversource

The New Hampshire review is complete. The final review of Connecticut and western Massachusetts substations will be completed by the 1<sup>st</sup> qtr of 2016. The review of eastern Massachusetts substations will be completed by mid 2016.

**New Hampshire**

RNS Transmission substations	Mitigation Cost	Schedule
None	0	N/A

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**Connecticut**

RNS Transmission substations	Mitigation Cost	Schedule
2	\$0M - \$2M each	2017

T&D Substations in Review	Mitigation Cost	Schedule
11	TBD	TBD

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**Western Massachusetts**

RNS Transmission substations	Mitigation Cost	Schedule
None	0	N/A

T&D Substations in Review	Mitigation Cost	Schedule
8	TBD	TBD

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**Eastern Massachusetts**

The flooding review of eastern MA substations will be complete in the second quarter of 2016.