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October 18, 2021

Dear NEPOOL Participants and Stakeholders,

During the September 23, 2021 Pathways to the Future Grid working session, National Grid requested that the Analysis Group study a scenario that compares the costs of an offshore wind (OSW) transmission system versus the costs of OSW projects with individual generator lead lines.

Eversource does not support this request for the following reasons:

- First, comparing the costs of various transmission configurations will not affect the results. According to Analysis Group's September 23 presentation, "Because resource siting and transmission upgrade cost modeling assumptions will be the same in all central cases, differences in the level of costs (potentially higher or lower than the true cost) will tend to have comparable effects on each approach." The central cases are designed to compare differences in outcomes between alternative market-based approaches to decarbonizing the power sector. Comparing costs of different transmission configurations does not provide information related to different market-based approaches for decarbonizing the resource mix. The consultant specializes in economic analysis and would likely need support from transmission engineers to develop transmission cost estimates that would then become assumptions in the analysis. This additional work, while providing little additional information germane to the analysis, would further increase the time associated with its completion. Stakeholders eagerly await the results of the analysis as an input into subsequent discussion of market design and potential reform considerations.
- Second, this request is beyond the scope of the Pathways study. Determining the relative costs of a potential OSW transmission system versus the costs of individual generator lead lines with a reasonable degree of accuracy would require a detailed engineering study and an assessment of the business and timing risks that each approach could impose on OSW generation. To the extent that the costs of transmission facilities for OSW are expected to have a material impact on the study results, Eversource suggests using a high-level range of potential costs rather than expanding the scope of the Pathways effort.
- Finally, Eversource believes that this request will add further delay to an already extensive process. In 2020, the Massachusetts Department of Energy Resources (DOER) held an Offshore Wind Transmission Technical Conference, which was sandwiched around two sets of Offshore Wind Transmission Stakeholder Q&A's and represents a significant amount of perspectives immediately available to stakeholders. As mentioned above, stakeholders are eagerly awaiting

the results of the analysis as in input to time-sensitive market design and potential reform proposals.

Thank you for the opportunity to comment and we look forward to continuing to work on this important initiative for New England market participants and stakeholders.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Daly", with a long horizontal flourish extending to the right.

James Daly
Vice President Energy Supply