

August 8, 2025

The Honorable Mark C. Christie
Chairman
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Docket No. EL25-44

Dear Chairman Christie,

I write to provide comments on the complaint filed by the Industrial Energy Consumers of America in Docket No. EL25-44.

I strongly support increased Federal Energy Regulatory Commission (FERC) oversight of the planning process for local transmission projects, including the implementation of an independent review mechanism. Such oversight would ensure only necessary projects are undertaken and any costs that are paid by ratepayers are reasonable.

Currently, transmission owners in New England can unilaterally invest in significant transmission construction for local upgrades and maintenance projects, often termed “asset condition projects”, with little to no meaningful review or oversight. Transmission owners are investing heavily in these types of projects. In fact, spending on asset condition projects represents 73 percent of the annual amount that transmission owners spend on all projects in New England.¹ However, these investments receive minimal scrutiny. As a result, the necessity, scope, and cost of the asset condition projects often go unreviewed, unchecked, and unrestrained.

In 2016, when ISO-NE first began tracking asset condition projects, there were only about \$58 million worth of such projects planned or under construction in the region.² However, by the end of 2025, that figure is projected to balloon to \$1.184 billion, or more than 20 times the amount less than 10 years ago.³ Despite this significant increase in spending, transmission owners in New England face only minimal requirements to justify their projects in the region’s

¹ ISO-New England Inc., RSP Project List and Asset Condition List March 2025 Update, page 5, https://www.iso-ne.com/static-assets/documents/100022/final_project_list_presentation-mar_2025_clean.pdf.

² ISO-New England Inc., Asset Condition List March 2016 Update, <https://www.iso-ne.com/system-planning/system-plans-studies/rsp/rsp-project-list-and-the-asset-condition-list>.

³ ISO-New England Inc., RSP Project List and Asset Condition List March 2025 Update, page 5, https://www.iso-ne.com/static-assets/documents/100022/final_project_list_presentation-mar_2025_clean.pdf.

stakeholder process and even receive a presumption that the investments are prudent during FERC's review. Notably, it appears utilities are proactively repairing infrastructure and making other unnecessary or untimely investments in local transmission projects.⁴ It is no coincidence that transmission owners receive above market rates of return on these projects, further burdening ratepayers.

Connecticut consumers already face some of the highest electricity rates in the nation, with an average cost of 28.16 cents per kilowatt-hour compared to the national average of 16.26 cents per kilowatt-hour as of December 2024.⁵ While Connecticut works to lower these rates, the unchecked spending of billions of dollars on asset condition projects continues to unjustly and unreasonably increase costs, resulting in unfair and exorbitant energy prices for Connecticut residents.

As we continue to build and improve transmission lines to meet the growing demand for energy, it is essential to ensure that these projects receive close scrutiny. The ratepayers in Connecticut and across the country should not be burdened with paying for projects that may be unnecessary. Our investments must be both cost-effective and grounded in actual need.

I strongly urge you to carefully review the complaint filed by the Industrial Energy Consumers of America and take meaningful steps to strengthen oversight of asset condition projects for the benefit of ratepayers across Connecticut and our country.

Sincerely,



Richard Blumenthal
United States Senator

CC:

The Honorable David Rosner, Commissioner
The Honorable Lindsay See, Commissioner
The Honorable Judy Chang, Commissioner

⁴ Luther Turmelle, "New Hampshire Eversource project could increase Connecticut customers' bills," *CT Insider*, August 19, 2024, <https://www.ctinsider.com/business/article/ct-official-objects-to-cost-of-electric-project-19660704.php>; Ethan Howland, "Eversource, others may be capitalizing on lax reviews for some transmission projects: Maine officials," *Utility Dive*, February 2, 2024, <https://www.utilitydive.com/news/eversource-national-grid-iso-new-england-ferc-asset-condition-transmission-maine/706393/>.

⁵ "Electric Power Monthly," U.S. Energy Information Administration, last modified December 31, 2024, https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a.