

Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 1 of 9

DATE: October 13, 2023
TO: Maine Office of the Public Advocate
RE: The Central Maine Power Company's Objections and Initial Responses to the Maine Office of the Public Advocate's September 15, 2023 Information Requests

In accordance with Attachment 1 to Appendix C of Attachment F to the ISO New England Inc. Open Access Transmission Tariff, the Central Maine Power Company ("CMP") hereby submits these initial responses to the information requests submitted to the ISO-NE Participating Transmission Owners ("PTOs") by the Maine Office of Public Advocate ("Maine OPA") by email dated September 15, 2023.

CMP's initial responses are based upon the best available information known to it at the current time. While a good faith attempt has been made to identify all applicable objections, CMP may later determine that further objections are relevant or appropriate. Accordingly, CMP expressly reserves the right to raise any such additional objections, concerning both general and specific matters, at any time that they may later be identified.

CMP objects to the information requests to the extent that they seek information not in the possession or control of CMP, seek information in a form other than that in which CMP's files and records are maintained, seek information or documents protected by an applicable privilege, doctrine, law, or rule, and/or require CMP to undertake new studies or analyses. CMP further objects to the information requests as unduly burdensome to the extent that they request "any" or "all" materials.

CMP provides its attached responses to the information requests subject to and without waiver of the foregoing objections.

Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 2 of 9

1. For each NETO:

(a) describe the procedures and processes you employ to evaluate the need for a particular asset condition project and how such procedures and processes were developed;

(b) to the extent these procedures are embodied in written policies, (1) please provide copies of such documents (2) identify to whom these policies are circulated and the respective roles of the recipients;

(c) (1) Identify the persons working for the NETO as employees, officers or consultants who are involved in the decision-making process for asset condition projects included in the informational filing and for which the NETO seeks cost recovery, (2) to the extent any person identified in (c)(1) recommended against proceeding with a particular asset condition project, provide copies of any notes, emails, or other documents reflecting and describing the nature of each such disagreement. If no such documents exist, provide a narrative description of the person(s)' reasons for recommending against the each project responsive to this request.

CMP appreciates the Maine OPA's inquiry regarding the planning process for asset condition projects. However, public interest in the nature of that planning process is outside of the designed purpose of the Transmission Formula Rate Protocols under Appendix C to Attachment F of the ISO-NE OATT ("Protocols"). The Protocols "are designed to provide increased transparency into the calculation of the Annual Transmission Revenue Requirement ('ATRR') that CMP and other PTOs in New England use to determine rates for transmission service.¹ The Maine OPA's information request concerns general processes and procedures and does not reference any particular computations, worksheets or actual costs or expenditures that are part of the calculation of the ATRR. CMP accordingly objects to this information request on the grounds that it is beyond the scope of the Protocols and the Information Exchange Process.² Though the Maine OPA's request refers to Section V.1.h of the Protocols, the information requested does not address what may be reasonably necessary to determine the prudence of actual costs and expenditures included in the Annual Update. CMP also objects to the Maine OPA's information request because it is vague, undefined, unclear, unduly burdensome, and is "directed to ascertaining whether the Formula Rate is just and reasonable."³

As the Maine OPA may be aware, CMP and other transmission owners have been engaged in discussions with regional stakeholders in addressing many of the questions contained in Maine OPA's information requests. In particular, the transmission owners have been working to provide additional information and process enhancements and have made several

¹ See Protocols, Section I.

² See Protocols, Section V.

³ Protocols, Section V.1.

Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 3 of 9

presentations to the ISO New England Planning Advisory Committee (“PAC”) over the past few months. Materials from these presentations, as well as feedback from stakeholders, are posted to the ISO New England website.⁴ In particular, CMP encourages the Maine OPA to refer to the New England Transmission Owners’ August 8, 2023 letter.⁵ Additionally, a presentation on asset condition project planning processes is scheduled for the October 18, 2023 PAC meeting.

Response Prepared By: Counsel

Attachments: None

⁴ See ISO New England, Inc., <https://www.iso-ne.com/system-planning/transmission-planning/transmission-owner-asset-management>).

⁵ Available at (https://www.iso-ne.com/static-assets/documents/2023/08/2023_08_16_netco_letter_to_nescoe_asset_condition_process_updates.pdf) which provides a schedule of anticipated stakeholder presentations for the remainder of 2023.

Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 4 of 9

2. For each NETO:

(a) Please describe whether the NETO has procedures in place for the purpose of considering project alternatives that are more efficient, including non-transmission alternatives, evaluating the potential deferral of such projects, or more limited/partial replacement projects as alternatives given to asset condition projects? If so, please provide copies of any written documents describing such procedures. Also please provide any written communications in the form of emails, memoranda, policy documents, or the like describing how consideration of such alternatives (including the weight they might be accorded) was included in the decision-making process for asset condition projects proposed to be included in rates in this year's Annual Informational Filing.

(b) provide examples of asset condition projects that were rejected for inclusion in the informational filing in lieu of alternatives of the type described in (a) above. Provide all documents reflecting, describing or detailing the reasons for any such rejection. If no project initially considered for cost recovery in the NETO's filing in this case was rejected, i.e., if every asset condition project initially considered by the NETO for cost recovery in this case was included in the filing, so state.

CMP appreciates the Maine OPA's inquiry regarding the planning process for asset condition projects. However, public interest in the nature of that planning process is outside of the designed purpose of the Transmission Formula Rate Protocols under Appendix C to Attachment F of the ISO-NE OATT ("Protocols"). The Protocols "are designed to provide increased transparency into the calculation of the Annual Transmission Revenue Requirement ('ATRR') that CMP and other PTOs in New England use to determine rates for transmission service.⁶ The Maine OPA's information request concerns general processes and procedures and does not reference any particular computations, worksheets or actual costs or expenditures that are part of the calculation of the ATRR. CMP accordingly objects to this information request to the extent it is beyond the scope of the Protocols and the Information Exchange Process.⁷ Though the Maine OPA's request refers to Section V.1.h of the Protocols, the information requested does not clearly address what may be reasonably necessary to determine the prudence of actual costs and expenditures included in the Annual Update. CMP also objects to the Maine OPA's information request because it is vague, undefined, unclear, unduly burdensome, and is "directed to ascertaining whether the Formula Rate is just and reasonable."⁸

As the Maine OPA may be aware, CMP and other transmission owners have been engaged in discussions with regional stakeholders in addressing many of the questions contained

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Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 5 of 9

in Maine OPA's information requests. In particular, the transmission owners have been working to provide additional information and process enhancements and have made several presentations to the ISO New England Planning Advisory Committee ("PAC") over the past few months. Materials from these presentations, as well as feedback from stakeholders, are posted to the ISO New England website.⁹ In particular, CMP encourages the Maine OPA to refer to the New England Transmission Owners' August 8, 2023 letter.¹⁰ Additionally, a presentation on asset condition project planning processes is scheduled for the October 18, 2023 PAC meeting.

Further, CMP does not have any asset condition projects listed on Worksheet 8 of Appendix A in the Annual Update Filing.

Response Prepared By: Counsel

Attachments: None

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¹⁰ Available at (https://www.iso-ne.com/static-assets/documents/2023/08/2023_08_16_netco_letter_to_nescoe_asset_condition_process_updates.pdf) which provides a schedule of anticipated stakeholder presentations for the remainder of 2023.

Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 6 of 9

3. For each NETO:

(a) does the NETO maintain an asset condition data base? If so, what types of information are included in the data base, how is such information utilized to determine whether an asset condition project is needed and how frequently is the data base updated?

(b) If the answer to (a) is yes, provide a copy of the data base in readable digital format.

(c) If the answer to (a) is yes, explain how that data base was used to assess the need for the asset condition projects for which the NETO seeks recovery in this case. Provide all documents relating to the use of such asset condition data base in the NETO's decision making process.

(d) If the answer to (a) is no, please explain why and providing any supporting documents.

CMP appreciates the Maine OPA's inquiry regarding the planning process for asset condition projects. However, public interest in the nature of that planning process is outside of the designed purpose of the Transmission Formula Rate Protocols under Appendix C to Attachment F of the ISO-NE OATT ("Protocols"). The Protocols "are designed to provide increased transparency into the calculation of the Annual Transmission Revenue Requirement ('ATRR') that CMP and other PTOs in New England use to determine rates for transmission service.¹¹ The Maine OPA's information request concerns general processes and procedures and does not reference any particular computations, worksheets or actual costs or expenditures that are part of the calculation of the ATRR. CMP accordingly objects to this information request on the grounds that it is beyond the scope of the Protocols and the Information Exchange Process.¹² Though the Maine OPA's request refers to Section V.1.h of the Protocols, the information requested does not address what may be reasonably necessary to determine the prudence of actual costs and expenditures included in the Annual Update. CMP also objects to the Maine OPA's information request because it is vague, undefined, unclear, unduly burdensome, and is "directed to ascertaining whether the Formula Rate is just and reasonable."¹³

As the Maine OPA may be aware, CMP and other transmission owners have been engaged in discussions with regional stakeholders in addressing many of the questions contained in Maine OPA's information requests. In particular, the transmission owners have been working to provide additional information and process enhancements and have made several presentations to the ISO New England Planning Advisory Committee ("PAC") over the past few months. Materials from these presentations, as well as feedback from stakeholders, are posted to

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Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 7 of 9

the ISO New England website.¹⁴ In particular, CMP encourages the Maine OPA to refer to the New England Transmission Owners' August 8, 2023 letter.¹⁵ Additionally, a presentation on the development of a region-wide database with asset condition-related information was provided at the September 20, 2023 PAC meeting.

Response Prepared By: Counsel

Attachments: None

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Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 8 of 9

4. For each NETO:

(a) Where an asset project is determined by the NETO to be necessary and that viable alternatives do not exist, what safeguards are in place to ensure that an asset condition project is not placed into service before it is needed? To the extent a description of such safeguards is in writing, please provide copies of any documents, emails or other communications reflecting the NETO's policy. If such safeguards are not in writing, so state and explain why they are not in writing.

(b) To the extent the safeguards described in (a) exist, how were they employed with respect to each of the asset projects for which the NETO seeks recovery? If no such safeguards are in place, so state.

CMP appreciates the Maine OPA's inquiry regarding the planning process for asset condition projects. However, public interest in the nature of that planning process is outside of the designed purpose of the Transmission Formula Rate Protocols under Appendix C to Attachment F of the ISO-NE OATT ("Protocols"). The Protocols "are designed to provide increased transparency into the calculation of the Annual Transmission Revenue Requirement ('ATRR') that CMP and other PTOs in New England use to determine rates for transmission service.¹⁶ The Maine OPA's information request concerns general processes and procedures and does not reference any particular computations, worksheets or actual costs or expenditures that are part of the calculation of the ATRR. CMP accordingly objects to this information request on the grounds that it is beyond the scope of the Protocols and the Information Exchange Process.¹⁷ Though the Maine OPA's request refers to Section V.1.h of the Protocols, the information requested does not address what may be reasonably necessary to determine the prudence of actual costs and expenditures included in the Annual Update. CMP also objects to the Maine OPA's information request because it is vague, undefined, unclear, unduly burdensome, and is "directed to ascertaining whether the Formula Rate is just and reasonable."¹⁸

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Central Maine Power Company
Docket No. ER20-2054
2023 Annual Update
Maine OPA Request
Page 9 of 9

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