



**Department
of Public Service**

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September 7, 2023

Hon. Michelle Phillips
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case No. 22-E-0633 – In the Matter of New York Independent System Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022.

Dear Secretary Phillips:

Consistent with the requirements of the Commission's June 22, 2023 order in this proceeding (Order), Department of Public Service staff (Staff) will be engaging with potential transmission developers and other stakeholders in the near future through technical conferences. In preparation for those conferences, Staff and staff of the New York Independent System Operator, Inc. (NYISO) prepared the attached Q&A document that iterates principles arising from the inter-relationship of the Order and the NYISO's tariff procedures. Because this information may be of use to the participants in the upcoming conferences, we respectfully request filing of the document in this docket. Thank you for your assistance.

Sincerely,

Elizabeth Grisaru
Special Assistant, ESPP



QUESTION/ANSWER FOR NYC PUBLIC POLICY TRANSMISSION NEED

- 1. Under the Order, is it sufficient for proposed solutions to interconnect to facilities located in Zone J, or does the Order require proposed solutions to interconnect directly to Con Edison-owned facilities?**

A proposal that interconnects in Zone J is sufficient. A developer is not required to interconnect directly to a Con Edison-owned facility. For example, a developer can propose to interconnect to (a) a new substation(s) of the developer's design, (b) an existing substation(s) owned by Con Edison (including the Brooklyn Clean Energy Hub), (c) an existing substation(s) owned by another Transmission Owner or other entity, or (d) a contemplated substation(s) that Con Edison identifies and shares as an option for interconnection offshore wind infrastructure. In addition, consistent with the NYISO's existing process, a developer can identify a new substation(s) or expansion of existing substation(s) as potential Network Upgrade Facilities to interconnect a transmission cable in Zone J.

- 2. In order for a project to be a complete, end-to-end proposal, does the Order require a developer to identify how the proposed transmission will connect to Zone J?**

Yes. The Order requires a developer to include transmission facilities from the cable landing points to the points of interconnection in Zone J as noted in Question No. 1 above and "also local transmission upgrades" as discussed in Question No. 6 below.

- 3. The Order directs Con Edison to establish a process to make information about cost-effective options for interconnecting the contemplated transmission infrastructure into Zone J. Are developers required to participate in this process?**

No. Participation in the information sharing process contemplated by the Order, while encouraged, is entirely voluntary on the part of a developer. The Order intended to create an exploration opportunity with Con Edison to "reduce interconnection-related risk as much as possible." Developers may elect to proceed with designing their projects without collaborating with Con Edison or participating in the information sharing process contemplated by the Order.

4. **Did the Order designate Con Edison as the sole entity eligible to build, own, and recover the costs of transmission facilities in Zone J, including new/expanded substations to interconnect the offshore wind transmission facilities and other transmission elements that may be included as part of a developer’s project?**

No. The Order does not grant any new rights or alter any existing rights that Con Edison currently possesses under the NYISO’s tariffs and agreements to build, own, and recover the cost of transmission facilities proposed in the Public Policy Transmission Planning Process. The PSC intended that the rules under the NYISO’s tariffs governing the designation of a selected Public Policy Transmission Project apply to a transmission solution proposed by a developer to address this current Public Policy Transmission Need.

5. **The Order refers to the importance of identifying efficient points of interconnection (POIs) in Zone J for offshore wind development. Are projects that propose to interconnect to Con Edison substations (such as the Brooklyn Clean Energy Hub or other contemplated POI substation identified by Con Edison) granted a preference in the evaluation and selection stage by the NYISO?**

No. Under its existing process, the NYISO performs a comparative evaluation of all solutions based on the criteria detailed in Attachment Y of the OATT, the criteria prescribed by the PSC in the Order, and any other criteria discussed with stakeholders consistent with the OATT. There is no preference for direct connections with Con Edison facilities, and the benefits and risks of each proposal will be evaluated under the above-referenced criteria.

6. **The Order states that developers shall include “[n]ecessary improvements to and/or expansion of the existing onshore transmission system” in a proposed solution. Beyond the physical interconnection of the offshore wind transmission facilities, are developers required to propose additional facilities related to the onshore transmission system?**

The Order anticipates that the additional transmission capacity from offshore wind resources into Zone J may require local system reinforcements to support the output of the offshore wind energy and to reduce curtailment risk for the connected offshore generators. Developers should propose new facilities and expansions of the local transmission system in Zone J for the overall performance of the project and to achieve a minimum of 4,770 MW of incremental offshore wind generation injected into Zone J without reducing the overall output of other renewable resources interconnected in Zones J and K.

7. **In order to be a complete, end-to-end solution, does a single proposed solution have to, by itself, satisfy the technical requirements under Attachment A? For example, does a single proposed solution have to “accommodate the full output of at least 4,770 MW of incremental offshore wind generation injected into New York City (Zone J), under applicable reliability standards, without reducing the overall output of other renewable resources interconnected in Zones J and K?”**

Yes. The Order identifies a “Public Policy Requirement driving the need for transmission to support the injection of at least 4.77 GW of offshore wind energy with the Con Edison system . . . subject to the more detailed criteria and specifications listed in Appendix A.” Each proposed solution must satisfy the criteria set forth in Appendix A by itself. Accordingly, under the NYISO’s process, each proposed solution must independently satisfy those requirements. For example, each proposed solution must independently accommodate 4,770 MW nameplate capacity of incremental offshore wind at full output, which must be injected into Zone J.

8. **The Order prescribed a criterion for the NYISO to consider “potential interference and/or synergy with the Long Island Offshore Wind Export PPTN.” In designing proposed solutions, should the developers assume that the offshore wind injected into Zone K is based on (a) the current contracted offshore wind projects with points of interconnection located in Zone K (totaling 2,184 MW) or (b) 3,000 MW to align with the Long Island Offshore Export Wind PPTN?**

Developers should assume 3,000 MW of offshore wind injection into Zone K. This was the minimum requirement established by the PSC in its Long Island Offshore Wind Export PPTN Order, issued March 19, 2021.