

By Electronic Delivery

October 9, 2020

Ralph V. Suozzi, Chair
Board of Trustees
Long Island Power Authority
333 Earle Ovington Blvd, Suite 403
Uniondale, NY 11553

Subject: NYPSC Case 20-E-0497 – In the Matter of New York Independent System Operator, Inc.'s Proposed Public Policy Transmission Needs for Consideration for 2020.

Dear Chair Suozzi:

The New York Independent System Operator, Inc. (“NYISO”) hereby submits proposed transmission needs driven by Public Policy Requirements for consideration by the Long Island Power Authority (“LIPA”) as a part of the NYISO’s 2020-2021 transmission planning cycle.

The NYISO Open Access Transmission Tariff (“OATT”) provides that at the start of each cycle of its Public Policy Transmission Planning Process, the NYISO “will provide a 60-day period, . . . to allow any stakeholders or interested parties to submit to the ISO, or for the ISO on its own initiative to identify, a proposed transmission need(s) that it believes is being driven by Public Policy Requirement(s) and for which transmission solutions should be requested and evaluated.”¹ The ISO “will post all submittals on its website after the end of the needs solicitation period, and will submit to the [New York State Public Service Commission (“NYPSC”)] all submittals proposed by stakeholders, other interested parties, and any additional transmission needs and criteria identified by the ISO.”² For any submittal proposing transmission needs that require a physical modification to transmission facilities in the Long Island Transmission District, the NYISO will post those submittals on its website and submit them to the NYPSC and LIPA, together with any transmission needs and criteria proposed by the NYISO.³

The OATT further provides that the NYPSC “will review all proposed transmission need(s) and, with input from the ISO and interested parties, identify the transmission needs, if any, for which specific transmission solutions should be requested and evaluated.”⁴ In the case of submittals proposing transmission needs that require a physical modification to transmission facilities in the Long Island Transmission District, the tariff requires LIPA to review those submittals and identify the transmission needs within the Long Island Transmission District

¹ OATT Section 31.4.2.

² *Id.*

³ *Id.*

⁴ OATT Section 31.4.2.1.

driven by a Public Policy Requirement, in consultation with the New York State Department of Public Service.⁵ The OATT also requires LIPA to issue a written statement as to whether a Public Policy Requirement does or does not drive a need to physically modify transmission facilities solely within the Long Island Transmission District and then transmit to the NYPSC for review and a determination whether the transmission need identified by LIPA should be considered a Public Policy Transmission Need for purposes of the NYISO evaluating transmission solutions for selection and regional cost allocation under the Public Policy Transmission Planning Process.⁶

On August 3, 2020, the NYISO issued a letter inviting stakeholders and interested parties to submit proposed transmission needs driven by Public Policy Requirements to the NYISO on or before October 2, 2020. Submitted for review are 11 proposals for transmission needs that, as proposed, would require a physical modification to transmission facilities in the Long Island Transmission District by: Anbaric Development Partners, LLC, AVANGRID, Inc., City of New York⁷, Con Edison Transmission, Inc., LS Power Grid New York, LLC, New York Power Authority, New York Transco, New York Transmission Owners, Orsted U.S. Offshore Wind, PSEG Long Island, Transource Energy, LLC. The NYISO has posted these submittals on its Planning Studies website.⁸

Please contact me at (518) 356-6220 or cpatka@nyiso.com if you have any questions or concerns.

Respectfully submitted,

NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.
By: /s/ Carl F. Patka
Carl F. Patka
Assistant General Counsel
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144

cc. NYPSC Secretary
Anna Chacko, General Counsel, LIPA

⁵ OATT Section 31.4.2.3.

⁶ *Id.*

⁷ The proposals submitted by the City of New York are included for review by LIPA insofar as the need for transmission to accommodate offshore wind could require modifications to the transmission system on Long Island, such as, but not limited to, “increasing the connections between Zones J and K to improve reliability and resiliency of the electric system on Long Island.” *See* New York City Proposal, at p 15.

⁸ The submittals are posted under “Proposed Needs” contained within the “Public Policy Documents” folder on the NYISO’s Planning Studies website, which can be accessed at: <https://www.nyiso.com/cspp>