

ANDREW M. CUOMO Governor JOHN R. KOELMEL Chairman GIL C. QUINIONES President and Chief Executive Officer

SUBMITTED VIA ELECTRONIC FILING

March 12, 2021

Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426

> RE: Informational Filing - Transmission Formula Rate New York Power Authority Docket No. ER17-1288-000

Dear Secretary Bose:

The New York Power Authority ("NYPA") hereby submits to the Federal Energy Regulatory Commission ("FERC") this informational filing of its 2020 Annual Update to its Formula Rate ("Informational Filing") used to determine NYPA's Annual Transmission Revenue Requirement ("ATRR").¹ This Informational Filing is made pursuant to Section 14.2.3.2.6 of Attachment H of the New York Independent System Operator, Inc. ("NYISO") Open Access Transmission Tariff ("OATT"). NYPA, a transmission owner in New York State whose Formula Rate is administered in accordance with the Formula Rate Template and the Protocols set forth in Attachment H of the NYISO OATT, has an obligation under the Protocols to make this Informational Filing by the later of March 15 or sixty calendar days following the close of the Review Period of the Annual Update Process for the current Rate Year.

NYPA includes with this Informational Filing its Formula Rate Template populated with 2019 Calendar Year data, consistent with NYPA's requirements under the Annual Update Process. NYPA provides this material in the attached files in both native "workable" Excel file format and in PDF format. Second, NYPA includes its NYPA Form 1 Equivalent for the 2019 Calendar Year in PDF format that contains supporting financial information required under the Annual Update Process. Last, NYPA provides the following link to NYPA's Financial Report for the 2019 Calendar Year: https://www.nypa.gov/-

¹ Any capitalized terms used in this transmittal letter and not otherwise defined herein shall have the meanings set forth in the Formula Rate Implementation Protocols ("Protocols") which appear in Section 14.2.3.2 of NYISO OATT Attachment H.

/media/nypa/documents/document-library/financials/nypa-financial-report-2019-and-2018.pdf.

Under the Protocols, NYPA's Financial Report serves as the basis for the inputs to the Annual Update.

This Informational Filing provides the information required under the Protocols to reasonably determine that the input data under the Formula Rate were properly recorded and that NYPA has properly applied the Formula and Protocols.² NYPA posted its updated Formula Rate Template on the NYISO's internet website on June 29, 2020, which became effective July 1, 2020. NYPA provided the required notice of the NYISO's website posting of the Annual Update and of an upcoming Open Meeting to all Interested Parties. NYPA held its Open Meeting on July 30, 2020 to provide an opportunity for Interested Parties to obtain information about the Annual Update.

During the Annual Update Process, NYPA received Information Requests from the New York Association of Public Power, but received no Preliminary Challenges from any Interested Party.

Upon answering one of the Information Requests to explain that maintenance charges for underground lines (Account 572) in the Formula Rate Template contained a lower, corrected figure than the amount shown in the NYPA Form 1 Equivalent, NYPA staff later discovered that a further downward adjustment to Account 572 in the amount of \$67,788 was required. This correction will be included as a Prior Period Adjustment, with interest, in the Formula Rate Template that will be included as part of the 2021 Annual Update.

Also during the Annual Update Process, NYPA discovered that Federal Emergency Management Agency reimbursements received in 2019 were not accounted for properly in developing the Projected Annual Transmission Revenue Requirement. This resulted in an overstatement of allocated "Administrative & General Expenses" of \$2.94 million (Schedule A2 of the Formula Rate Template), which will be returned to ratepayers as a Prior Period Adjustment, with interest, in the 2021 Annual Update.

In accordance with the Protocols, NYPA will notify the Interested Parties of this Informational Filing submittal and of the NYISO's posting of a notice of this submittal on its website, within one business day of this filing.

Copies of correspondence regarding this Informational Filing should be served to the following persons:

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² See NYISO OATT, Attachment H, Section 14.2.3.2.6 ("Informational Filing").

Please do not hesitate to contact me if you have any questions regarding this Informational Filing.

Respectfully submitted,

<u>/s/ Gary D. Levenson</u> Gary D. Levenson Principal Attorney 914/390-8030 (telephone) 914/390-8038 (facsimile) gary.levenson@nypa.gov

Attachments:

Formula Rate Template in Excel and PDF formats NYPA Form 1 Equivalent in PDF format