

NATIONAL GRID would like to take this opportunity to thank the NYISO for its efforts and its ongoing support for the Public Policy Requirements in Western New York.

NATIONAL GRID comments and requested edits to the Western New York PPTN Report are below.

Edits for inclusion into the NYISO W-NY PPTN Report:

Current version of Draft Report

3.7 Evaluation of Interaction with Local Transmission Owner Plans

In the NYISO's Public Policy Transmission Planning Process, the NYISO is required to review the Local Transmission Owner Plans (LTPs)²² as they relate to the BPTF to determine whether any proposed regional Public Policy Transmission Project on the BTPF can (i) more efficiently or cost-effectively satisfy any local needs driven by a Public Policy Requirement identified in the LTPs, or (ii) might more efficiently or cost-effectively satisfy the identified regional Public Policy Transmission Need than any local transmission solutions driven by Public Policy Requirements identified in the LTPs.

The Transmission Owners' current LTPs have not identified any needs driven by a Public Policy Requirement in New York State. Accordingly, the NYISO determined that there are no proposed regional Public Policy Transmission Projects that could more efficiently or cost-effectively satisfy a need driven by a Public Policy Requirement identified in an LTP. In the absence of any public policy needs in the LTPs, it is also not necessary for the NYISO to determine whether a regional transmission project would more efficiently or cost effectively satisfy such a transmission need on the BPTF than a local transmission solution.

In the transfer analysis described in Section 3.2.1, the NYISO monitored the non-BPTF portion of the Bulk Electric System (BES) up to STE ratings and determined if the loss of the non-BPTF element would cause other facilities to be overloaded. The NYISO also performed transfer analysis monitoring the non-BPTF portion of the BES to LTE ratings. Under such conditions, some Western New York 115 kV lines are overloaded at higher Ontario to New York transfer levels. The

Requested Edits Highlighted Below:

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²¹ The NYISO readily identified and back out those elements of the developer's projects that were included to address the preexisting non-BPTF overloads.

Footnote 21: The NYISO readily identified and backed out those elements of the developers' projects that were included to address the preexisting non-BPTF overloads on Lines #54, #193 and #194.

Questions:

- National Grid is unclear what criteria, parameters or rationale was used as part of the comparative analysis to modify developer proposed non-BPTF scope. Can you please clarify or provide the criteria used? For example, National Grid 192 line work was modified or eliminated without explanation, while other non-BPTF elements were unchanged. Likewise, it is unclear to National Grid if, or to what extent, any non-BPTF elements proposed by other Developers where, or where not, included for comparing solutions.
- National Grid proposals included 115kV Non-BPTF project elements that also addressed certain identified non-BPTF overloads. In Section 3.6 of its Draft Report, the NYISO indicates that:
“Based upon the information from National Grid on reconductoring the #193 and #194 lines, the relief of the pre-existing non-BPTF overloads will be undertaken in the same manner regardless of which proposed project is selected by the NYISO. In its order confirming the Western NY Need, the PSC determined that the costs of resolving the non-BPTF overloads should not be a distinguishing factor among project proposals. Accordingly, the NYISO did not include the costs of reconductoring the #193 and #194 lines, or the costs of any other non-BPTF project elements that were included to address the identified non-BPTF overloads in the costs used to compare the costs of each of the developers’ projects.”

For the purpose of accurately and comparing proposals in a consistent manner – “apples-to-apples” -, it is unclear to National Grid why 115kV Non-BPTF proposed project elements that also addressed certain identified non-BPTF overloads where not removed from the National Grid proposals? National Grid believes there was a sizable scope within its proposed projects in T011 and T012 that also addressed non-BPTF Local Transmission Planning Criteria.

Note: National Grid wishes to better understand the process NYISO and its Independent Consultants used to ensure a consistent approach across all solutions when adding or removing non-BPTF elements, other than the 193 and 194 elements specified in the NYPSC Order.

Correction:

- National Grid plans to self-perform above grade/structures and electrical construction (including protection and control).

National Grid did not state it was going to self-perform above grade / structure and electrical construction.

While we understand this not critically important for the project selection process, the report should still provide an accurate account of information and properly reflect National Grid submission and therefore state:

- National Grid plans to perform (contract out or self-perform) above grade / structure and electric construction (with protection and control self-performed)