

Public Comments  
on the NYISO's Proposal on

In-City Capacity Mitigation for Controllable Lines (dated 7/7/09)

Submitted on Behalf of the New York Transmission Owners,  
LIPA and NYPA

July 21, 2009

- There has been insufficient discussion to support the conclusion that controllable transmission lines should be subject to mitigation. We also offer up the following for consideration:
- Transmission is a separate and distinct product from that of generation. Besides providing energy and capacity, it can also provide emergency assistance to an external control area.
- A controllable transmission line may be bi-directional.
- The existing Cost of New Entry (CONE) for the Installed Capacity (ICAP) Market does not pertain to new transmission, therefore it is not reasonable to apply the same "actual cost" standard used for new generation.
- Applicability to the Linden VFT needs to be better understood, and whether that it is the driver for the implementation of this proposal by December.
- Some of the Transmission Owners have appealed FERC's mitigation orders and any support for this proposal should not be construed as support for the underlying mitigation Orders.