

Phase II: NYISO COMPREHENSIVE TRANSMISSION PLAN

By John P. Buechler

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Why Are We Here??

- FERC requirement that ISOs/RTOs must have a comprehensive planning process in place
 - Order 2000
 - SMD NOPR
 - White Paper
- NYISO does not yet have a formalized comprehensive planning process
 - NYISO RTO Filing was rejected in July 2001
 - NERTO filing was withdrawn
 - Phase I approval was the first step in this process
- > One of NYISO's Strategic Planning objectives
- Increased emphasis on Planning following recent events

Phase I: Initial Planning Process

Premises

- No filing necessary
- Implement under existing ISO Ageement
- Implement under existing ISO Governance process
 Operating Committee approved on September 10th
- Avoid most contentious issues
- Begin implementation by Fall 2003

NYISO Initial Planning Process



Initial Planning Process: Final Steps

Publicize Consolidated Plan

- Present at stakeholder meetings
- Post on NYISO website
- Distribute broadly to draw attention to identified needs
 E.g. "Power Alert" type report

> END OF INTERIM PLANNING PROCESS

> At this Stage, the NYISO will NOT

- Make any determination of specific facilities
- Issue an RFP in response to needs
- Direct any entity to build facilities
- Propose any cost allocation process



Phase II:

Comprehensive Planning Process

Phase II:Comprehensive PlanningProcess

Premises

- Will need to address FERC RTO/SMD/White Paper requirements
- FERC Tariff filing will be required
- Will Build Upon the Initial Planning Process
- Will need to address and resolve contentious issues
- Collaborative efforts to begin immediately upon resolution of the Initial Planning Process

Comprehensive Planning Process: Scope

> Builds upon Initial Planning Process

Initial steps are the same

- Inputs, Scope, Needs Assessment, Interregional Coordination
- Addresses process after the development and approval of the Needs Assessment
 - Discussion: Should needs assessment include economic needs?
- > Addresses NYISO authority & TO Obligations
- Goal is to ensure that needed upgrades are built to maintain reliability
 - Discussion: And to meet economic needs/reduce congestion?

Comprehensive Planning Process: RFS

Request for Solutions

- Following issuance of Needs Assessment
 - ► **Discussion**: To include economic needs?
 - ► Criteria will need to be developed for determination of economic need
- Open to all resources
- NOT an RFP
- Need to determine response timing, qualifications for resources, etc.
- TOs would have an obligation to prepare regulated transmission proposals to meet reliability needs
 - Discussion: Obligation to submit/"voluntary" submission of regulated solutions for economic needs?

Comprehensive Planning Process: Reliability

NYISO Evaluation of Reliability Proposals

- If Market proposals are judged sufficient to meet the identified needs in a timely manner, plan will so state
 - NYISO will monitor status of market projects to ensure needs will be met
- If Market proposals are judged insufficient, NYISO will turn to regulated transmission proposals, which will be included in the plan
- If neither market proposals nor regulated transmission proposals can satisfy the need in a timely manner, NYISO will have the discretion to seek a "Gap" solution



ISSUES

FOR

DISCUSSION

Reliability Upgrades: TO Role

- TOs would assume the obligation to build a regulated transmission reliability upgrade that is included in the final NYISO Plan
 - **Discussion**: Should TOs have the "right of first refusal"?
 - Discussion: Should TOs be required to contract for construction?
- > TO obligation is subject to ability to recover costs
 - Requires FERC and PSC concurrence
 - Discussion: Should regulatory agencies give deference to the NYISO Plan?
 - **Discussion**: Should there be incentives to construct?
- TO Obligation is subject to obtaining siting approval, local permits, etc.

Comprehensive Planning Process: Economic

> NYISO Role in Economic Projects

- Discussion Topics:
- Should the NYISO provide projections of congestion to marketplace?
- Should the NYISO develop criteria to determine an "economic need"?
- Should the NYISO identify specific projects which can meet the need?
- How should cost recovery/allocation mechanisms be designed?
- Should the NYISO have the authority to direct expansion to meet an economic need?

Economic Upgrades: TO Role vs Market Role

- > TO Role
 - Discussion Topics:
 - Should TOs have an obligation to build economic upgrades?
 - Can TOs choose to respond to economic needs on a voluntary basis?
 - Should TOs have any preferential ability with regard to economic upgrades?
 - Should TOs be precluded from addressing economic needs with a regulated transmission project?

Market Role

- Discussion Topics:
 - Should market response to economic needs be purely voluntary?
 - Should market response be open to "all resources?"

Comprehensive Planning Process: Cost Allocation

For Reliability Upgrades

- Discussion Topics:
 - Should upgrades with local benefits be included in TO retail rates?
 - Should upgrades with statewide benefits be included in NYISO Tariff?
 - ► Need to develop criteria to determine local/statewide benefit

For Economic Upgrades

Discussion Topics:

- Beneficiaries Pay" vs regional recovery?
- ▶ Need to develop criteria to determine "beneficiaries"
- Need to develop a mechanism for revenue recovery
- Applies to economic upgrades associated with the NYISO Plan
- Does not apply to market-driven responses

Procedural Issues

Consider formation of a Planning Committee

- *Reporting to the Management Committee*
- To recognize the critical importance of the NYISO Planning function
- To administer the Comprehensive Planning Process
- To consolidate responsibility for other Planning functions
- Need to decide what existing committees should report to the Planning Committee
- Need to determine inter-relationships with BIC and OC

Other Issues

Role of Merchant Transmission

- Planning process should accommodate both regulated & merchant transmission
- Role of regulated vs merchant transmission must be defined
- Should merchant transmission be eligible for regulated recovery?

Other Issues (Cont'd)

"Gap" Solutions for Reliability Needs

Discussion Topics:

- Should TOs assume the obligation to build?
- ► Should the NYISO issue an "all source" RFP?
- Should the NYISO contract directly with resources?
- Should "gap" solutions be limited to reliability needs?
- ▶ How to define the period of need/length of contract?
- ▶ What happens when "gap" period expires?