

## **NYISO Comprehensive Planning Process for Reliability Needs**

### **Proposed Changes Submitted by Mike Mager Multiple Intervenors**

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Multiple Intervenors has several concerns regarding the Transmission Owners' proposed changes that were attached to your e-mail. Those concerns are identified below.

6.2 - To the extent the inserted language is retained, it should be modified to read: "At the same time that a PROPOSAL FOR A backstop regulated solution is requested ..." (added language in CAPS).

7.1-7.3 - These appear to be substantive changes proposed by the TOs that are not acceptable. To our knowledge, there was no MC approval of the concept that the NYISO would not review non-TO regulated proposals unless and until no market-based proposals were advanced. Although, as a practical matter, regulated proposals by a TO are likely to be the first submitted by the NYISO, other regulated proposals should be reviewed by the NYISO as submitted to ascertain whether they address the identified reliability need(s). To preclude review until the market fails to respond, as the TOs seemingly propose, would provide TO regulated solutions with an unfair advantage over the regulated solutions proposed by other parties.

Finally, as mentioned in the e-mail I sent in yesterday, we continue to have concerns with section 11.3 (regarding cost recovery), which incorporates the NYISO/TO agreement which has yet to be finalized and with which we continue to have concerns. We raised several concerns regarding the draft NYISO/TO agreement at the last ESPWG meeting. The TOs indicated they were going to get back to the parties with respect to their position on Multiple Intervenors' objections. Thus far, we have not heard from the TOs or seen a revised NYISO/TO agreement and, therefore, cannot accept section 11.3 of the tariff as proposed.

Mike Mager