

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

### **Proposed Changes Submitted by Tom Rudebusch**

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John:

I keeping with the idea that we are commenting on the comprehensive plan as approved by the Management Committee, and reserving all rights as to how a party may prefer it to read, I have only one comment at this time.

At 4.2.4, the phrase "and municipal electric utilities," I thought (perhaps mistakenly), was to be added at the end of the section after "long-term transmission requests (made by the Transmission Owners and Municipal Electric Utilities)."

A Municipal Utility can make a long-term transmission request. On the hand, if a Municipal Utility constructs substantial transmission, then by definition it becomes a Transmission Owner. I don't see how the draft version makes sense.

Tom Rudebusch