

NYISO Planning, Invenergy appreciates the opportunity to provide comment to transmission needs driven by Public Policy Requirements.

In light of the recent NY DPS order calling for 50% renewables by 2030, it is clear additional transmission will be needed to meet the goal. NY will need significant quantities of new wind energy built over the next 10 years in order to meet its 50% renewable goal. Without upgrades to the transmission lines, local overloads will likely cause many of these projects to be curtailed during periods of high wind. Adding transmission in wind development areas will minimize curtailments and enable the state to efficiently meet its 50% renewables goal.

With that in mind, evaluation criteria should first consider the number of potential wind MWs that could be built in an area. As one approach, NYISO could estimate potential MWs using queue requests however a more accurate approach would be to work with NYSERDA or other consultancy to identify wind sites in NY. A third approach would be to interview developers. Use of any and/or all these approaches would be best. Once potential wind areas are identified, NYISO should assign transmission lines these projects would likely connect to, evaluate capacity of these lines and upgrades that would help ensure the connected renewable projects would not exceed the line capacities and estimated cost of upgrades. By taking this approach, NYISO would be in a position to determine if the line should be upgraded and relative cost and benefits to getting renewables to an uncongested part of the system.

Thank you for the opportunity to provide these comments and Invenergy looks forward to continuing the discussion with the NYISO on how to meet the state's renewable goals.

Regards,
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