



PPL TransLink, Inc.

September 23, 2016

To: PublicPolicyPlanningMailbox@nyiso.com

Re: Request for Proposed Transmission Needs Being Driven by Public Policy Requirements for the 2016-2017 Transmission Planning Cycle

PPL TransLink, LLC thanks you for the opportunity to offer our views on New York State's transmission needs driven by public policy requirements as solicited in your letter of August 1, 2016. PPL TransLink, an affiliate of PPL Corporation, develops competitive transmission and other electric industry infrastructure projects. An affiliate of PPL TransLink, PPL Electric Utilities Corporation, is a Qualified Developer pursuant to Attachment Y of the New York Independent System Operator's Open Access Transmission Tariff.

The recently adopted Clean Energy Standard (CES), with its aggressive goal for reducing carbon in the use of electricity by New York consumers, creates a significant need for new transmission capacity, including transmission linking the New York Control Area to neighboring control areas with renewable energy resources.

In adopting the CES, the New York State Public Service Commission (NYS PSC) wisely included renewable resources located in control areas adjacent to the New York Control Area as eligible to qualify for CES participation, provided delivery can be assured, including "with documentation of a contract path and delivery of the underlying energy for consumption in New York." *See Order Adopting a Clean Energy Standard*, August 1, 2016, at 106 and Appendix A, p. 7.

Renewable resources that qualify for the CES exist in Quebec, Ontario and Pennsylvania but added transmission ties to those areas will be needed to enable the New York State Energy Research Development Authority to purchase their energy production for delivery into the New York Control Area.

The need for incremental transmission ties to Quebec, Ontario and Pennsylvania that can enable owners and developers of renewable resources in those areas to meet the delivery, measurement, tracking and verification requirements of the CES should be a transmission need driven by a public policy requirement. PPL TransLink proposes that incremental transmission ties to Quebec, Ontario and Pennsylvania should be adopted as public policy transmission needs by the NYS PSC pursuant to Attachment Y.

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Very truly yours,

Brian Zickefoose 9/23/2016

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PPL TransLink, Inc.