

NYSEG/RG&E comments on the "NYISO Comprehensive Planning Process for Reliability Needs" document:

1. First, we need clarification over the extent of the transmission system this process is intended to apply. Since the objective of planning for reliability is to meet the reliability criteria, then it follows that this process should apply to that portion of the transmission system that is subject to the reliability criteria contained in the NERC, NPCC and NYSRC documents, as referenced in 3.1. This clarification should be made somewhere in 3.
2. Stakeholder process (2) - We agree with the ISO that the dual role for ESPWG and TPAS should continue until the entire comprehensive planning process is completed. However, at some point before the final process is filed with FERC, ESPWG members will need to take up the subject of the longer term future of ESPWG, whether a Planning Committee is a good idea and the structure and relationship of such a committee with BIC and OC.
3. Hedged and unhedged congestion (4.3.1.1) - Just a question: Have we fully vetted the definitions of hedged and unhedged congestion? Will such definitions be in the congestion report?
4. Board Action (4.4.3) - What happens if the Board does not approve the Report? Presumably they will send it back to ISO staff, with comments. In this case, a step in the process should be to have ISO staff review the Board's comments with the ESPWG and accept additional input from market participants. This should also be the procedure for the Comprehensive Reliability Plan (8.3), for a similar occurrence.

5. Regulated Responses (6.2.1) - We do not believe the PSC will review the proposals (at least formally) before they are submitted to the ISO. The TOs should propose them to the ISO first. There are projects that the PSC will have very little interest in (ex. - capacitors), as not all projects proposed will necessarily trigger the Article VII process. Certainly the PSC will have an opportunity to informally review proposals as they are submitted and SRIS scopes are prepared.

6. Gap solutions (7.3) - We believe that the decision to seek gap solutions is a TO responsibility, not an ISO responsibility, as the TOs are ultimately responsible for future reliability, through the Public Service Law.

