



September 5, 2017

PublicPolicyPlanningMailbox@nyiso.com

NEETNY Additional Comments on NYISO’s Draft Western New York Public Policy Transmission Planning Report

NextEra Energy Transmission New York, Inc. (“NEETNY”) appreciates this opportunity to provide additional comments to the New York Independent System Operator (“NYISO”) in response to the Draft Western New York Public Policy Transmission Planning Report, dated August 23, 2017 (“Draft Report”), as set forth below.

The Western New York Public Policy Transmission process has been ongoing for several years. NYISO has been evaluating projects since they were submitted in December 2015 and has been working on the Draft Report with its consultant, Substation Engineering Company (“SECO”), for approximately eight months. NYISO has been fully transparent throughout this process by keeping participants informed on the status of its analysis through Electric System Planning Working Group (“ESPWG”) and Transmission Planning Advisory Subcommittee (“TPAS”) presentations.

NYISO provided participants with the Draft Report on June 30, 2017. Interested parties have had the opportunity to provide NYISO with comments at four separate ESPWG/TPAS meetings held on July 20, August 8, August 18, and August 28, 2017. In addition, NYISO has welcomed written comments from interested parties and has received over a dozen comments from various stakeholders. NYISO addressed comments at every ESPWG/TPAS meeting held following the date those comments were submitted. Prior to the August 28 ESPWG/TPAS meeting, NYISO released 14 pages of frequently asked questions along with NYISO’s responses to each. In short, the NYISO staff and SECO provided more than two months for stakeholders to provide their input and NYISO and SECO have responded to public comments. Nothing has been raised, whether in these meetings or in the comments, that would warrant a change in NYISO’s recommendation that NEETNY’s Project T014 be selected by the NYISO Board to satisfy the Western New York Public Policy Need.

NEETNY’s T014 project best meets the objectives set forth by the New York Public Service Commission (“NYPSC”) and the NYISO. In its Draft Report, NYISO determined that NEETNY’s T014 project is superior to other projects in areas such as the Ontario-NY transfer limit, performance of the Niagara hydroelectric generation and transmission ties, and operability of the transmission system. In improving the NYISO’s flexibility and efficiency to operate the transmission system, T014 was assigned the only “Excellent” rating accorded to any project. Similarly, NYISO properly conducted its production cost analysis to account for demand congestion, emissions, and load payments and found that T014 generated the highest Production Cost Savings and highest ratio of Production Cost Savings to project cost. NYISO and SECO

also determined that NEETNY's T014 project also provides significant emissions reductions and increases system capacity to deliver renewable energy thereby assisting New York State towards achieving its Clean Energy Standard goal of 50% renewables by 2030.

NEETNY's competitors have attempted to criticize aspects of NYISO's evaluation in isolation, or raise irrelevant concerns, that either have no impact on the overall scoring of projects or that are best addressed in an Article VII proceeding. NYISO's obligation pursuant to its tariff is to select a project that best targets the Public Policy Need on an overall basis. NYISO has met its obligation. T014 outscores all other projects in metrics designed to evaluate the ability to increase imports of renewable hydroelectric power, while significantly improving NYISO's transmission system operability in that part of the State, all at reasonable cost.

Thank you for your consideration of these comments. We look forward to working with NYISO, the NYPSC, and other stakeholders as the process continues.

Sincerely,

Stephen Gibelli

Stephen Gibelli
Director of Regulatory Affairs
On behalf of NextEra Energy Transmission New York, Inc.