



September 29, 2017

Via E-Mail

Mr. Michael Bemis
Chairman of the Board
c/o Mr. Bradley Jones
President & CEO
New York Independent System Operator
10 Krey Boulevard
Rensselaer, NY 12144

RE: Support for the Recommendation of the Final Western New York Public Policy
Transmission Planning Report to Select the Empire State Line Proposal 1 (TO14)

Dear Chairman Bemis:

The New York Association of Public Power (“NYAPP”) appreciates this opportunity to provide comments on the Final Western New York Public Policy Transmission Planning Report. NYAPP supports the recommendation of the Report that the Board select the NextEra Transmission New York, Inc.’s Empire State Line Proposal 1 (TO14) to address the Western New York Public Policy Transmission Need identified by the NYISO. The TO14 Project best meets the objectives related to relieving transmission congestion in Western New York. NYAPP requests that the Board and the staff use best efforts to relieve these constraints on an expedited basis.

NYAPP members and their customers have been, and continue to be, negatively impacted by the constraints that restrict the delivery of power from the Niagara Project and Ontario. The process of addressing these negative impacts has taken too long. While NYAPP realizes that this is the first public policy transmission need to be processed, and that the NYISO is not solely responsible for administering the process, the Board must be mindful that the delays are imposing a cost on consumers.

NYAPP is reasonably satisfied that the TO14 project is the most efficient and cost effective transmission solution to the Western NY Transmission Need. The staff of the NYISO diligent and thorough study and they deserve to be commended for their efforts. In addition to be taking too long, the process was not perfect. There are lessons to be learned from considering the comments of the New York Power Authority and others.

Going forward, there are also tariff changes that need to be considered. NYAPP is particularly interested in cost containment. The tariff should allow developers to propose, and the NYISO to consider, binding caps on project costs. NextEra Energy, for one, is familiar with this concept and has made commitments to other organizations.

Respectfully submitted,

/s/

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For the New York Association of Public Power