

**NEW YORK STATE
PUBLIC SERVICE COMMISSION**

**Application of New York Regional
Interconnect, Inc. for a Certificate of
Environmental Compatibility and Public
Need Pursuant to Article VII for a High
Voltage Direct Current Electric
Transmission Line Running Between
National Grid's Edic Substation in the
Town of Marcy, and Central Hudson Gas &
Electric's Rock Tavern Substation Located
in the Town of New Windsor.**

Case: 06-T-0650

**REBUTTAL TESTIMONY OF STEVEN L. COREY
ON BEHALF OF THE
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Steven L. Corey. My business address is: New York Independent
3 System Operator, Inc. ("NYISO"), 10 Krey Blvd., Rensselaer, NY 12144.

4 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?**

5 A. Yes.

6 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

7 A. The purpose of my rebuttal testimony is to respond to certain issues raised in the
8 prepared testimony submitted by Michael Forte in this proceeding on behalf of
9 Consolidated Edison Company of New York, Inc. ("Con Edison").

10 **Q. DO YOU AGREE WITH MR. FORTE'S STATEMENT (AT 12) THAT**
11 **DATA USED IN THE NYRI SRIS WAS "AS OLD AS FIVE YEARS?"**

12 A. No. The base cases utilized for the NYRI SRIS were based on the 2005 FERC
13 715 power flow cases, updated to reflect projects above NYRI in the
14 interconnection queue and other updates provided by the Transmission Owners.
15 And, since the NYRI SRIS base cases were prepared by the NYISO and provided
16 to NYRI's consultant in September 2006, it is unclear how the data in those cases
17 could be considered five years old.

18 **Q. MR. FORTE (AT 12) IDENTIFIES THE CAPACITOR BANK AT**
19 **MILLWOOD AS AN EXAMPLE OF A RECENT CHANGE TO THE NEW**
20 **YORK STATE SYSTEM. WAS THE CAPACITOR BANK AT**
21 **MILLWOOD PROPERLY EXCLUDED FROM THE NYRI SRIS BASE**
22 **CASES?**

1 A. Yes. The SRIS study scope for the NYRI project was approved by the NYISO
2 Operating Committee in September 2006. The NYISO's records indicate that it
3 provided the base cases to NYRI's consultant to perform the SRIS analysis on
4 September 28, 2006. The Millwood capacitor bank is actually associated with the
5 Athens Special Protection System ("SPS") that was studied through a System
6 Impact Study ("SIS"). The study scope for that SIS was approved by the NYISO
7 Operating Committee in October of 2006. Also, the Millwood capacitor bank was
8 not included as part of the initial Athens SPS project, but was later identified
9 during the course of the Athens SIS. The Athens SIS was approved by the
10 Operating Committee in January 2007. The NYISO's practice for transmission
11 projects that result from an SIS request, such as the Athens SIS, is to consider
12 modeling the project for SRISs commenced only after the Operating Committee
13 has approved the SIS. Therefore, the Millwood capacitor bank was properly
14 excluded from the NYRI SRIS base cases.

15 **Q. WOULD THE INCLUSION OF THE CAPACITOR BANK AT**
16 **MILLWOOD IN THE NYRI SRIS BASE CASE HAVE ALTERED THE**
17 **CONCLUSIONS OF THAT STUDY?**

18 A. No. Even if the Millwood capacitor bank was modeled in the NYRI SRIS base
19 case, the conclusions of that study would not have been altered. The NYISO
20 conducted an internal analysis to evaluate the potential impact of this and several
21 other claims asserted by Con Edison in its Notice of Appeal to the NYISO Board
22 of Directors concerning the approval of the NYRI SRIS. While the NYISO did
23 not agree with all the claims raised by Con Edison in its Notice of Appeal, the

1 internal analysis was performed making the changes to the base case suggested by
2 Con Edison. The results of this analysis show that the UPNY-ConEd voltage
3 limit would be increased by about 200 megawatts (“MW”), but would remain the
4 controlling limit under the modified study assumptions.¹ Additionally, even if the
5 thermal limit were the controlling limit, under the Minimum Interconnection
6 Standard, the 500 MW impact of the NYRI project on the thermal limit would not
7 have been identified as an adverse reliability impact because the potential adverse
8 reliability impact indicated by the approximately 500 MW reduction in the
9 UPNY-ConEd thermal limit can be managed through the normal operating
10 procedures of the NYISO. Please refer to my direct testimony (at 8) for a
11 discussion of the Minimum Interconnection Standard.

12 **Q. MR. FORTE MAKES A STATEMENT CONCERNING THE**
13 **OPTIMIZATION OF TRANSFERS (AT 13). DO THE NYISO'S SRIS**
14 **PROCEDURES REQUIRE THE OPTIMIZATION OF TRANSFERS IN**
15 **ORDER TO MAXIMIZE TRANSFER LIMITS?**

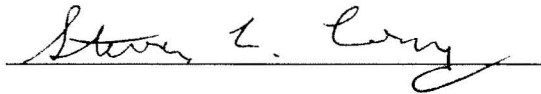
16 **A.** No. Nothing in the NYISO’s SRIS procedures requires that the transfers be
17 optimized.

¹ The NYISO’s internal summary of this analysis is submitted herewith as Exhibit __ (SLC-5).

1 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

2 A. Yes. It does.

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7 Steven L. Corey

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9 Sworn to before me this 2nd day of March,
10 2009 in the City of Rensselaer, County of
11 Rensselaer, New York:

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15
16 Diane Egan
17 Notary Public
18 AFFIX SEAL:

DIANE L. EGAN
Notary Public, State of New York
Qualified in Schenectady County
No. 4924890
Commission Expires March 21, 20 10

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