

Con Edison Minority Statement

Con Edison wishes to have this minority statement incorporated into the NYISO's first Reliability Needs Assessment (RNA) study.

Con Edison's analysis recognizes that system operators normally position the bulk power transmission system such that it will withstand the next contingency anywhere in the state and a second contingency in New York City. Such operator actions mitigate the need for reliability-based projects such as those identified in the RNA due to transfer limit reductions derived from voltage/reactive considerations. While the RNA assumes load growth throughout its study horizon it limits generation and transmission additions only to those that currently meet a given criteria. As such, it is only a matter of time before the studies will identify reliability needs and voltage/reactive transfer limitations that would otherwise be mitigated if operational solutions were considered.

Further, the tables identify needs in terms of resource additions. The MW additions in the RNA tables do not consider operational based solutions to reliability needs. Future conditions are not precisely known and we consider that the NYISO results in the RNA should be interpreted as bracketing the range of potential needs, from those derived from voltage-constrained transfer limits to those derived from thermal-constrained transfer limits. By incorporating routine operating actions, the study results could vary by reducing and in some cases eliminating the voltage limitations as well as result in higher thermal limits. An example of such action could include utilization of PARs to their full normal capability, which would reduce the magnitude of the identified needs from those presented in the report. As a result, the conclusions for Base Case conditions may be misleading in that it is not clear what the most likely outlook for reliability needs will be in future years.

Con Edison remains concerned about the ultimate presentation of these results and the interpretation of needs for both the development of reliability backstop solutions and development of preferred market response projects. We urge the NYISO to reconsider these issues and present the RNA results in an appropriate manner.