

Con Edison's Appeal Of The Operating Committee's Decision To Amend Con Edison's SRIS Study Scope

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Agenda 08



Background

- In order to meet load growth, Con Edison proposed to build the Mott Haven substation.
- The Mott Haven SRIS study scope was developed by Con Edison consistent with industry standards and approved by the NYISO staff.
 - It used the standard industry representation for power flows over the ABC lines between PJM and NY:
 - 100 MW over the A line
 - 450 MW over the B line
 - 450 MW over the C line
- At its April 29th meeting, the OC approved a PSEG proposal that added an additional scenario:
 - It required that Con Edison model the ABC lines using an additional representation of 333.3 MW for each line.

The Original Scope Was Based On Standard Industry Data

- The 100/450/450 MW representation of power flows over the ABC lines used by Con Edison in the original study scope is the standard representation used by:
 - NYISO, PJM, NPCC, MACC
- The NYISO staff agreed with Con Edison's power flow representation and study scope.
- The scope was acceptable to TPAS.

The Scope Of An SRIS Should Be Limited To Reliability Standards

- The *NYISO System Reliability Impact Study Criteria and Procedures* state that the objectives of an SRIS are to:
 - “Confirm that the proposed new or modified facilities associated with the project comply with applicable reliability standards”
- NYISO procedures further state that the SRIS technical assumptions are used to:
 - “support a minimum interconnection standard”

There Is No Reliability Need For The Amendment

- The proposed Mott Haven substation is electrically remote from the ABC lines.
- The OC did not offer any evidence that the proposed substation will have an adverse reliability impact on the standard power flow over the ABC lines, in support of the amendment to add an alternate power flow distribution.
- Nor did the OC offer any proof that either the standard, or its proposed alternate, power flow distribution over the ABC lines will have a reliability impact on Mott Haven itself.
- Finally, the OC did not offer any evidence of a reliability need in support of its amendment.

Economic & Litigation Scenarios Do Not Belong In An SRIS

- The 1/3, 1/3, 1/3 representation of power flows over the ABC lines is PSEG's litigation position in its on-going litigation with Con Edison at FERC.
- The OC's amendment requires Con Edison to provide PSEG with free engineering analyses in support of PSEG's litigation position against Con Edison.
 - This amendment is at no cost to PSEG.
- A reliability study is not the place to study the economic impacts of a market participant's preferred litigation outcome.
- The OC's amendment is inappropriate.

The Amendment Sets A Bad Precedent

- It is not just Con Edison that is at risk:
 - An SRIS for a generator interconnection would be subject to an amendment by the generator's competitor
 - An SRIS for a merchant transmission project could be amended by a competing developer.
 - In the recent past, PSEG has attempted to amend other SRIS, Scopes (e.g. Conjunction, Liberty VFT Intertie, etc.) with similar requests. Those attempts have been rejected.
 - Con Edison's own SRIS should be entitled to the same deference.
- The SRIS should not be used by other parties to require free studies in support of their litigation positions.
- The reliability focus would be lost

PSEG's SRIS Used The Standard Representation

- When Con Edison was asked by PSEG to do an SRIS for PSEG's interconnection at West 49th Street, the data used was the standard industry representation.
- PSEG agreed with the use of the data.

Conclusion

- Amending an SRIS study scope to include litigation support and extraneous analyses is inappropriate.
- Con Edison requests that:
 - The decision of the Operating Committee to amend Con Edison's study scope be overturned.
 - Con Edison's original SRIS study scope be reinstated.