

By Electronic Delivery

November 7, 2022

Honorable Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Agency Building 3, 19th Floor
Albany, NY 12223-1350

Subject: Case 22-E-_____ – In the Matter of New York Independent System Operator, Inc.'s Proposed Public Policy Transmission Needs for Consideration for 2022.

Dear Secretary Phillips:

The New York Independent System Operator, Inc. (“NYISO”) hereby submits proposed transmission needs driven by Public Policy Requirements for consideration by the New York State Public Service Commission (“Commission” or “NYPSC”) as a part of the 2022–2023 cycle of the NYISO’s Public Policy Transmission Planning Process.

The NYISO’s Open Access Transmission Tariff (“OATT”) provides that at the start of each cycle of its Public Policy Transmission Planning Process, the NYISO “will provide a 60-day period, . . . to allow any stakeholders or interested parties to submit to the ISO, or for the ISO on its own initiative to identify, a proposed transmission need(s) that it believes is being driven by Public Policy Requirement(s) and for which transmission solutions should be requested and evaluated.”¹ The NYISO “will post all submittals on its website after the end of the needs solicitation period, and will submit to the NYPSC all submittals proposed by stakeholders, other interested parties, and any additional transmission needs and criteria identified by the ISO.”² For any submittal proposing transmission needs that require a physical modification to transmission facilities in the Long Island Transmission District, the NYISO will post those submittals on its website and submit them to the Commission and the Long Island Power Authority (“LIPA”), together with any transmission needs and criteria proposed by the NYISO.³

The OATT further provides that the Commission “will review all proposed transmission need(s) and, with input from the ISO and interested parties, identify the transmission needs, if any, for which specific transmission solutions should be requested and evaluated.”⁴ In connection with the Commission’s role in the NYISO’s Public Policy Transmission Planning Process, the Commission issued, on August 15, 2014, a “Policy Statement on Transmission

¹ OATT § 31.4.2.

² *Id.*

³ *Id.*

⁴ OATT § 31.4.2.1.

Planning for Public Policy Purposes” in the above-entitled proceeding to establish procedures “to guide the transmission planning process for public policy purposes.”⁵

In the case of submittals proposing transmission needs that require a physical modification to transmission facilities in the Long Island Transmission District, the tariff requires LIPA to review those submittals that identify the transmission needs requiring a physical modification of transmission facilities within the Long Island Transmission District driven by a Public Policy Requirement, in consultation with the New York State Department of Public Service.⁶ The OATT also requires LIPA to issue a written statement as to whether a Public Policy Requirement does or does not drive a need to physically modify transmission facilities solely within the Long Island Transmission District and then transmit to the Commission for review and a determination whether the transmission need identified by LIPA should be considered a Public Policy Transmission Need for purposes of the NYISO evaluating transmission solutions for selection and regional cost allocation under the Public Policy Transmission Planning Process.⁷

On August 31, 2022, the NYISO issued a letter inviting stakeholders and interested parties to submit proposed transmission needs driven by Public Policy Requirements to the NYISO on or before October 31, 2022. Submitted for filing in the above-captioned proceeding are 17 proposals for transmission needs driven by Public Policy Requirements provided to the NYISO by:

- Alliance for Clean Energy New York and the New York Offshore Wind Alliance,
- AES Clean Energy,
- Avangrid Networks, Inc.,
- City of New York,
- Con Edison Transmission, Inc.,
- H.Q. Energy Services (U.S.) Inc.,
- Investor-owned New York Transmission Owners,
- Invenergy LLC,
- LS Power Grid New York Corporation I,
- National Grid Ventures,
- NextEra Energy Transmission New York,
- New York Transco LLC,
- The New York Power Authority,
- Orsted Wind Power North America LLC,
- PSEG Long Island,
- Rise Light & Power, LLC, and
- Transource Energy, LLC and Transource New York, LLC.

⁵ NYPSC Case No. 14-E-0068, Policy Statement on Transmission Planning for Public Policy Purposes, at p 3 (August 15, 2014).

⁶ OATT § 31.4.2.3.

⁷ *Id.*

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The NYISO has posted these submittals on its Planning Studies website.⁸

Please contact me at (518) 356-6000 or bhodgdon@nyiso.com if you have any questions or concerns.

Respectfully submitted,

The New York Independent System Operator, Inc.

By: /s/ Brian R. Hodgdon
Brian R. Hodgdon
Senior Attorney

⁸ The submittals are posted under “Proposed Needs” contained within the “Public Policy Documents” folder on the NYISO’s Planning Studies website, which can be accessed at: <https://www.nyiso.com/cspp>.