

LS Power Comments on The LI PPTN Viability & Sufficiency Assessment Results

LS Power Grid New York Corporation I (“LS Power”) offers the following comments in response to the LIPPTN Viability & Sufficiency Assessment results. At the March 1, 2022 ESPWG/TPAS meeting, stakeholders requested NYISO release the updated LIPPTN project proposals from the 19 Developers following a review of the Viability and Sufficiency Study assessment results.

After comparing the original project proposals for NYPA/Transco T047-T053 to the updated versions posted on March 4th, it appears that additional information may have been added to the scope(s) that wasn’t contemplated in the original proposals.¹ The revised project Planning Studies submitted for projects T047-T053 are redacted but the cover page indicates it was revised in February 2022, months after the close of the Project Proposal submittal date in October 2021.²

LS Power would like to understand whether these additional project components were identified and included in the original project proposals submitted by the October 2021 proposal deadline or if they were added subsequent to the original proposal deadline. LS Power is concerned that the additional components added to the NYPA/Transco proposals may have had a direct impact on the outcome of the Viability and Sufficiency assessment for these projects.

¹ The updated T047-T053 proposals include a new reference to “Other Project Components” that was not previously included as part of the original proposals provided. For example, Base Solution 1 (T047) references the new Other Project Components on Page 14 of Attachment B and Page 31 of Attachment C.

² The planning studies (Attachment C.08) for proposals T047-T053 are the only ones that have not been provided for review (beyond a cover page). Planning studies for all of the other proposals have been made available for review.