



March 7, 2022

Mr. Ross Altman, Manager Public Policy & Interregional Planning
New York Independent System Operator
10 Krey Boulevard
Rensselaer, NY 12144

Sent Via Email to: PublicPolicyPlanningMailbox@nyiso.com

RE: LI PPTN VSA Comments

Dear Mr. Altman,

NextEra Energy Transmission New York (“NEETNY”) appreciates the opportunity to provide these comments in response to the New York Independent System Operators’ (“NYISO”) request for comments on the presentation of the Viability and Sufficiency Assessment (“VSA”) for the Long Island Offshore Wind Public Policy Transmission Need (“LI PPTN”).

The Propel NY Energy projects (Project IDs T047-T053) appear to have been materially modified from the proposals submitted on October 11, 2021. There are project elements described in the system impact study (SIS) scope presented on March 1, 2022 at the NYISO TPAS meeting which are not in the public policy proposal documentation submitted last year. Specifically, there was a reconductoring of the Central Islip-Hauppauge 138kV transmission line included in the SIS scope which was not included in the public policy proposals (Table 1). This line is necessary to address thermal overloads identified by the NYISO due to off shore wind injections.

In the LI PPTN proposals, the Propel NY Energy projects include the addition of a new breaker at Holbrook (“Breaker Solution”), which partially addresses the overload. However, the Breaker Solution does not fully resolve the thermal overload and at least a reconductor of this transmission line – which was proposed by three other developers - is needed to address the overload. The reconductoring appears to be missing from the Propel NY Energy project LI PPTN proposals.

It is interesting to note that in the February 4, 2022 revision to Attachment C.8, the Propel NY Energy projects make note that a reconductor is only necessary if the rating on the Central Islip – Hauppauge 138 kV transmission line is correct as noted in NYISO’s VSA modeling. However, that same note is not provided for the Breaker Solution, which was proposed to address the same thermal overload of the Central Islip – Hauppauge 138 kV transmission line. Furthermore, the fact that the Central Islip-Hauppauge reconductor was not mentioned as a potential fix anywhere else in the LI PPTN submittal and was only mentioned in an apparently late revision to Attachment C.8., leads one to believe that a material modification to the Propel NY Energy proposals may have been made after the submittal of the proposals on October 11, 2021.

Table 1 – Location of Solution Components

PPTN Submittal Section	Date/Revision	Holbrook Breaker Solution	Potential Hauppauge – C. Islip 138 kV Reconductor
Executive Summary	BS1: October 8, 2021 BS2: November 29, 2021 – Rev1 BS3: November 29, 2021 – Rev1 AS5: October 8, 2021 AS6: November 30, 2021 – Rev1 AS7: October 11, 2021	Included	Not mentioned
Solution One-Line Diagram	BS1: Nov 16, 2021 & Feb 2, 2022 BS2: Dec 1, 2021 & Feb 2, 2022 BS3: Nov 16, 2021 & Feb 2, 2022 AS5: Nov 16, 2021 & Feb 2, 2022 AS6: Dec 1, 2021 & Feb 2, 2022 AS7: Dec 1, 2021 & Feb 17, 2022	Included	Not mentioned
Modeling File (IDV or Aux)	Posted March 4 th	Included	Not mentioned in idev
C.8. Planning Study	BS1: February 2, 2022 BS2: February 1, 2022– Rev2 BS3: February 4, 2022– Rev2 AS5: February 4, 2022– Rev2 AS6: February 4, 2022– Rev2 AS7: February 3, 2022– Rev2February 4, 2022	Included	Mentioned as a potential fix if the NYISO VSA rating is correct

NEETNY requests that the NYISO confirm that no material modifications were made to the Propel NY Energy project proposals. All viable and sufficient proposals should be required to satisfy the established NYISO VSA criteria including addressing overloads on the Central Islip-Hauppauge 138kV transmission line using the models provided to all developers.

Thank you for your consideration of these comments.

Sincerely,



Richard W. Allen

President
NextEra Energy Transmission New York, Inc.