

To Whom it May Concern,

PSEG Long Island appreciates NYISO's efforts in conducting the Long Island Offshore Wind Export PPTN Viability and Sufficiency Assessment along with considering TO feedback into the process. PSEG Long Island, acting on behalf of LIPA, has some additional concerns and comments that were not innately captured in the VSA results which we would like NYISO to consider as the Public Policy Transmission Planning Process moves into the Evaluation and Selection Phase. We understand NYISO is already considering several of these comments stated in the NYISO stakeholder meetings, and we wished to memorialize them in the following comments:

- PAR Impacts
  - PSEGLI has concerns about the project's impacts on the ability of our internal PARs to provide operational flexibility for our system. We would like the internal PARs to be assessed as part of Operability or in another category in the Evaluation and Selection phase
- Transfer Analysis
  - PSEGLI has concerns about the project's impacts on LIPA Internal transfer interfaces. We would like the internal transfer interfaces to be assessed in the Evaluation and Selection phase
- NUFs and the PPTPP
  - NYISO has discussed using high level cost estimates for NUFs identified in the SIS to inform the ongoing PPTPP. We remain concerned about the timing of the NUF identification and the timeline of the ongoing Public Policy Process. Would NYISO consider holding up the Evaluation and Selection to give the SIS time to identify the required NUF for all of the projects if the SIS identification is delayed?
- Redundancy
  - PSEGLI is concerned about the projects that reduce redundancy on the LIPA system. We would like to see the Evaluation and Selection to include an assessment of any reductions to redundancy as it impacts operability of the LIPA system.
- Retirement of existing assets
  - PSEGLI is concerned about the projects potential to retire existing healthy assets on the LIPA system that have significant life remaining. We would like any of these proposed retirements to be considered in the Evaluation and Selection.
- Operational Complexity
  - PSEGLI is concerned with operational dependency created as result of projects that would limit operational flexibility explicit to LIPA system and/or diminish efficiency to operate the Electric system. This impact may vary from project to project, so we would like that impact to be assessed and incorporated into the Evaluation and Selection.
- ROFR
  - In absence of a FERC order, LIPA reserves the right to a ROFR for transmission upgrades in our service territory.
- Article VII & Cost-overruns
  - In the Evaluation and Selection process there needs to be some consideration of the potential for cost overruns as result of Article VII and the confidence levels of cost estimates. The potential for community opposition during the Article VII process could be a key driver in the projects coming in at or above their cost estimates. Different confidence levels of cost estimate should be considered, for example cost after engineering and design considerations could go up based on detailed field visits and

engineering. We recommend NYISO risk-adjust each project for the potential of cost-overruns during project development, to be incorporated into project selection. How will the NYISO assess differing levels of Risk and Contingency in different levels of estimates?

We look forward to working with the NYISO and Developers as this process continues. Please feel free to reach out if any of these require clarification or further discussion.

Thanks,

*Nicholas Culpepper*

