

05/10/2022

LS Power Grid New York Corporation I (“LS Power”) would like to reply to claims made in the “Con Edison Comments on the Long Island PPTN Initial Facilities Characterization List” posted on May 5, 2022. In its comments, Con Edison disputes NYISO’s characterization of Facility ID S27, “Proposed Northgate 345 kV Substation on New Footprint”, Sub ID B – “Breaker and a half GIS installation”.

- Con Edison quotes the MISO tariff, which is irrelevant. The applicable definition is contained in the NYISO Tariff, Section 31.6.4, “For purposes of Section 31.6.4, the term “upgrade” shall refer to an improvement to, addition to, or replacement of a part of, an existing transmission facility and shall not refer to an entirely new transmission facility.” The new breaker and a half GIS installation at Northgate is an entirely new transmission facility under the NYISO tariff definition and clearly not an “upgrade”.
- While the MISO tariff is not applicable, Con Edison makes false claims in an attempt to characterize the installation as an “upgrade” under the MISO definition. Con Edison claims “The short length of these lines connecting back to Con Edison’s existing substation causes Facility S27-B to electrically function as a single substation with Con Edison’s existing substation. There is no other function of this proposed facility that the current existing substation does not meet.” This is not true. The new Northgate station integrates new HVDC converters connected to the new Southgate station, which serves a function the current Millwood 345 kV station does not meet. The new Northgate station will operate and function independent of the existing Millwood substation and be modeled separately for planning purposes, including as a separate system element with separate contingencies. It has utility and purpose separate and distinct from the Millwood station.

Thank you for considering these comments. We would be happy to discuss this further if necessary, and would also like the opportunity to discuss this further in the event there would be changes in the final characterization list to be posted on June 10.