

To Whom it May Concern,

PSEG Long Island, on behalf of LIPA, has identified the following disputes concerning NYISO's initial facility characterization of the 2021 LI OSW PPTN proposals. It should be noted that other facility designations may be effected by the arguments enclosed, but we have abstained from commenting as they are not applicable to LIPA owned transmission facilities.

#### **NON-CEII**

- **L53 Valley Stream (proposed) - East Garden City (proposed) 345 kV lines** - PSEG Long Island, on behalf of LIPA, respectfully disagrees with the NYISO's initial designation of the facility characterization as New. This should be treated as an improvement to an existing transmission facility through replacement with facilities operating with an increased nominal voltage. PSEG Long Island, on behalf of LIPA, believes that circuits that look to replace existing functionality should be characterized as an Upgrade and we agree others should be a characterized New facility. This interpretation is in line with the language of NYISO Tariff section 31.6.4.
- **S28-B Proposed Northport 138 kV Substation on New Footprint Breaker and a half 138 kV GIS installation** - PSEG Long Island, on behalf of LIPA, respectfully disagrees with the NYISO's initial designation of the facility characterization as New.
  - Developing an additional footprint near the existing substation and routing existing facilities to this footprint is effectively an expansion to or replacement of part of the existing substation. PSEG Long Island, on behalf of LIPA, believes this constitutes an addition to the existing transmission facility and/or a replacement of part of an existing transmission facility to allow integration of future interconnection facilities. This interpretation is in line with the language of NYISO Tariff section 31.6.4 and is reinforced by recent FERC approved MISO Tariff Attachment FF, Section VII.A.2.2.
  - PSEG Long Island, on behalf of LIPA, believes that this facility should be characterized as an Upgrade.
- **S30-B1 Proposed Ruland Road 345/138 kV Substation on New Footprint Breaker and a half 138 kV GIS installation** - PSEG Long Island, on behalf of LIPA, respectfully disagrees with the NYISO's initial designation of the facility characterization as New.
  - Developing an additional footprint near the existing substation and routing existing facilities to this footprint is effectively an expansion to or replacement of part of the existing substation. PSEG Long Island, on behalf of LIPA, believes this entire facility will be operated as a single substation, and constitutes an addition to the existing transmission facility and/or a replacement of part of an existing transmission facility to allow integration of future interconnection facilities. This interpretation is in line with the language of NYISO Tariff section 31.6.4 and is reinforced by recent FERC approved MISO Tariff Attachment FF, Section VII.A.2.2.
  - PSEG Long Island, on behalf of LIPA, believes that this facility should be characterized as an Upgrade.
- **S30-B2 Proposed Ruland Road 345/138 kV Substation on New Footprint Ring bus 138 kV AIS installation** - PSEG Long Island, on behalf of LIPA, respectfully disagrees with the NYISO's initial designation of the facility characterization as New.

- Developing an additional footprint near the existing substation is effectively an expansion of the existing substation. PSEG Long Island, on behalf of LIPA, believes this entire facility will be operated as a single substation, and constitutes an addition to the existing transmission facility and/or a replacement of part of an existing transmission facility to allow integration of future interconnection facilities. This interpretation is in line with the language of NYISO Tariff section 31.6.4 and is reinforced by recent FERC approved MISO Tariff Attachment FF, Section VII.A.2.2.
  - PSEG Long Island, on behalf of LIPA, believes that this facility should be characterized as an Upgrade.
- **S30-B3 Proposed Ruland Road 345/138 kV Substation on New Footprint Ring bus 345 kV AIS installation** - PSEG Long Island, on behalf of LIPA, respectfully disagrees with the NYISO's initial designation of the facility characterization as New.
  - Since 345kV rated facilities exist in the 138kV Ruland Road substation, a voltage upgrade at Ruland Road was inevitable. The developer's proposal is an expansion of the existing substation that was contemplated by the TO earlier. PSEG Long Island, on behalf of LIPA, believes this entire facility will be operated as a single substation, and constitutes an addition to the existing transmission facility and/or a replacement of part of an existing transmission facility. This interpretation is in line with the language of NYISO Tariff section 31.6.4 and is reinforced by recent FERC approved MISO Tariff Attachment FF, Section VII.A.2.2.
  - PSEG Long Island, on behalf of LIPA, only disputes configurations of Ruland Road 345kV that include a LIPA 138kV line converted to 345kV and reterminated to the 345kV facility. PSEG Long Island, on behalf of LIPA, does not dispute other configurations of Ruland Road 345kV that do not include a converted line.
  - PSEG Long Island, on behalf of LIPA, believes that this facility should be characterized as an Upgrade.
- **S30-(T,SHR,P)** - PSEG Long Island, on behalf of LIPA, respectfully disagrees with the NYISO's initial designation of the facility characterization as New.
  - The designation of these facilities should follow the relevant determinations for S30-B1, S30-B2, and/or S30-B3 as applicable.
  - PSEG Long Island, on behalf of LIPA, disputes configurations of Ruland Road 345kV that include a LIPA 138kV line converted to 345kV and reterminated to the 345kV facility. PSEG Long Island, on behalf of LIPA, does not dispute other configurations of Ruland Road 345kV that do not include a converted line.
- **S33-(B,T,SHR) Proposed Valley Stream 345 kV on New Footprint** - PSEG Long Island, on behalf of LIPA, respectfully disagrees with the NYISO's initial designation of the facility characterization as New.
  - Developing an additional footprint near the existing substation and routing existing facilities to this footprint is effectively an expansion of or addition to the existing substation. PSEG Long Island, on behalf of LIPA, believes this entire facility will be operated as a single substation, and constitutes an addition to the existing transmission facility and/or a replacement of part of an existing transmission facility to allow integration of future interconnection facilities. This interpretation is in line with the

language of NYISO Tariff section 31.6.4 and is reinforced by recent FERC approved MISO Tariff Attachment FF, Section VII.A.2.2.

- PSEG Long Island, on behalf of LIPA, believes that this facility should be characterized as an Upgrade.

Please let us know if you have any questions or concerns and we look forward to working with the NYISO to talk through these considerations.