



May 19, 2022

Via ELECTRONIC MAIL

PublicPolicyPlanningMailbox@nyiso.com
New York Independent System Operator, Inc.

RE: LI PPTN – Facility Characterizations

NextEra Energy Transmission New York (“NEETNY”) appreciates the opportunity to provide comments to the New York Independent System Operator (“NYISO”) regarding NYISO’s initial characterization of new transmission facilities and Public Policy Transmission Upgrades comprising the Public Policy Transmission Projects proposed in response to the Long Island Offshore Wind Export Public Policy Transmission Need (“Long Island PPTN”).

In response to comments submitted by stakeholders opposing certain facility characterizations, NEETNY provides information in the table below to support NYISO’s characterizations of certain NEETNY proposed facilities as “new” facilities. Justification for characterizing these facilities as new can be made on the basis that these facilities provide either a new electrical pathway or new electrical functionality that did not previously exist.

In its Updated Straw Proposal to Address Upgrades in the Public Policy Transmission Planning Process presented to the ESPWG/TPAS on August 20, 2019, NYISO provides a Conceptual Definition of “Upgrade” (see Slide 14). Per this definition, an upgrade is **not** “a new electrical pathway(s) or functionality that did not exist prior to the expansion”. As documented below, in each case, the proposed facility does add a new electrical pathway or new functionality.

Transmission Facility	Does it add new electrical pathway/function?
Proposed East Garden City 345 kV Substation on New Footprint (S24-B, -SHR, and -P)	The proposed East Garden City 345 kV substation establishes connections between multiple 345 kV transmission lines, including newly proposed 345kV transmission lines, that do not exist today. It will add new electrical pathways between the 345 kV lines and new functionality. The proposed EGC substation will create a new 345 kV hub that does not exist today.

Transmission Facility	Does it add new electrical pathway/function?
Proposed Valley Stream 345 kV on New Footprint (S33-B, -T, and -SHR)	There is no Valley Stream 345 kV substation today that allows power to flow from one 345 kV line directly to another 345 kV line. The proposed Valley Stream substation will create a new 345 kV hub that does not exist today. The proposed Valley Stream 345kV substation will be constructed as a BAAH scheme, providing greater reliability and operability than the current Valley Stream ring bus. It also creates new interconnection points for potential offshore wind injections or future 345 kV line connections.
Proposed Ruland Road 345/138 kV Substation on New Footprint (S30-B1, -T, -SHR, and -P)	There is no ability for the Ruland Road 138 kV substation today to receive power from a 345 kV line. The proposed Ruland Road substation will create a new 345 kV connection to a new 345 kV line. The proposed Ruland Road substation also loops in the Newbridge-Bagatelle Road transmission line creating new electrical pathways.
Valley Stream (proposed) – East Garden City (proposed) 345 kV lines (L53)	The proposed transmission lines provide three new 345 kV connections to Valley Stream from the new East Garden City substation. These lines create a new electrical pathway and functionality by providing a pathway for the 345 kV to Valley Stream from multiple 345kV transmission sources. These lines change the electrical configuration of the two existing EGC - Valley Stream 138 kV lines to interconnect two new 345 kV hubs, each hub providing a new electrical function that did not exist previously.

Please let us know if you have any questions related to the matters discussed herein.

Sincerely,



Richard Allen
President
NextEra Energy Transmission New York