Comments of Avangrid Networks, Inc. on
Public Policy Transmission Requirements for the
2022-2023 Transmission Planning Cycle

Avangrid Networks, Inc. ("Avangrid Networks") submits these comments in response to the New York Independent System Operator, Inc.'s ("NYISO") August 31, 2022 "Request for Proposed Transmission Needs Being Driven by Public Policy Requirements for the 2022-2023 Transmission Planning Cycle." In these comments, Avangrid Networks identifies two related and complementary Public Policy Transmission Needs for NYISO's consideration and referral to the New York Public Service Commission ("NYPSC").

The State has been making significant progress towards the objectives established in the Climate Leadership and Community Protection Act ("CLCPA") by encouraging the study and development of transmission upgrades beneficial to the integration of renewable resources. Progress has continued with the incumbent transmission owners comprehensive Phase 1 and Phase 2 "Areas of Concern" filings[1] in which plans to develop and advance Local transmission solutions that enable the integration of large-scale renewable generation resources across the state of New York are proposed. The State has also approved the advancement of other priority Bulk transmission projects that will help to deliver renewable energy from upstate New York into downstate load centers. In addition, the Long Island PPTN process is expected to result in the selection by NYISO of a transmission solution to allow for the deliverability of 3,000 – 6,000 MW of offshore wind into downstate New York.

Despite this progress, Avangrid believes that additional Bulk transmission system upgrades may be required to efficiently integrate and deliver the significant levels of new renewable generation without the risk of significant congestion and curtailment. Avangrid's preliminary analysis indicates that the possible Bulk transmission system upgrades needed to meet the state's renewable energy objectives will fall into two main categories, as described below.

[1] *See* NYPSC Docket No. 20-E-0197.

I. Additional Transmission Capacity into New York City – Zone J

New Bulk transmission solutions interconnecting upstate generation directly into New York City, bypassing constrained downstate interfaces, would have a beneficial impact for customers by reducing energy prices, production costs, and greenhouse gas ("GHG") emissions in Zone J and allowing for the retirement of in-city peaking generation facilities.

An additional transmission pathway(s) from upstate New York into Zone J will allow delivery of clean lower cost energy displacing higher-cost local resources resulting in a reduction in the cost of energy to customers. A future project addressing a Public Policy Transmission Need providing incremental transmission capacity between upstate New York and New York City would complement currently planned projects and reduce system-wide GHG emissions while improving system reliability and also reducing or eliminating dependence on local, high cost, high-emission resources in Zone J.

II. Additional Transfer Capacity Between Existing Interfaces

The creation of additional transmission pathways for delivering upstate clean energy into New York City is a crucial element for the state achieving CLCPA targets. However, the upstate to downstate Zone J pathway is not the only constrained pathway. To effectively reduce emissions from the electric sector to zero by 2040, improved transfer capability on the Bulk transmission system between upstate load zones is also necessary to ensure that significant additional renewable generation can be delivered from west to east and from upstate New York to southeast New York. Failure to increase interface capacity will likely lead to congestion and curtailment of upstate renewable generation, limiting the economic and environmental benefit to New York customers.

Conclusion

Avangrid Networks believes there are additional transmission needs that should be solved to efficiently utilize all of the states planned renewable resources to reduce future GHG emissions and production costs while also displacing

downstate fossil generation with clean energy resources. The implementation of solutions to these needs is expected to result in the reduction of New York City's dependency on fossil fuels and the improved utilization of plentiful upstate renewable energy potential.

Avangrid Networks requests that NYISO submit these proposed transmission needs to the NYPSC as Public Policy Transmission Needs in accordance with section 31.4.2 of the OATT.