



October 31, 2022

VIA ELECTRONIC MAIL:

PublicPolicyPlanningMailbox@nyiso.com

Mr. Zachary Smith
Vice President, System & Resource Planning
New York Independent System Operator
10 Krey Boulevard
Rensselaer, NY 12144

RE: Response to NYISO Solicitation of Transmission Needs Driven by Public Policy Requirements for the 2022-23 Transmission Planning Cycle

Dear Zach:

National Grid Ventures (“NGV”), the commercial division of National Grid, 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 (“NYISO’s Request”)¹ for the 2022-2023 Transmission Planning Cycle.² As addressed below, NGV respectfully requests that NYISO consider public policy transmission needs driven by the development of offshore wind resources to facilitate the delivery of the renewable generation required for New York State to meet the goals established in the Climate Leadership and Community Protection Act (“CLCPA”).

The landmark 2019 *CLCPA* legislation sets forth, among other things, New York State’s nation-leading goal of 9 GW offshore wind by 2035. More generally, the CLCPA establishes overarching targets of; 1) assuring New York obtains 70% of its electricity from renewable energy sources by 2030; 2) decarbonizing the electric grid by 2040; and 3) achieving economy-wide decarbonization of 85% from 1990 levels by 2050. These targets are likely to require increasing amounts of offshore wind, well beyond the current 9 GW, as NGV anticipates that the

¹ As defined in NYISO Open Access Transmission Tariff (“OATT”) Section 31.1.1, a Public Policy Requirement is “[a] federal or New York State statute or regulation, including a [New York State Public Service Commission] order adopting a rule or regulation subject to and in accordance with the State Administrative Procedure Act, any successor statute, or any duly enacted law or regulation passed by a local governmental entity in New York State, that may relate to transmission planning on the [New York State Bulk Power Transmission Facilities].”

² NYISO’s Request is issued pursuant to Section 31.4.2 of Attachment Y to NYISO’s OATT, which requires NYISO to provide stakeholders with an opportunity to identify transmission needs being driven by Public Policy Requirements (“PPR”) at the start of each Public Policy Transmission Planning Process.

New York State Energy Research & Development Authority (“NYSERDA”) will continue to evaluate the full potential of offshore wind in its comprehensive efforts to develop, establish and implement the full extent of New York State’s Renewables and Clean Energy mandates.

To ensure that New York State satisfies these ambitious climate goals, the CLCPA established the Climate Action Council, which is tasked with developing a Draft Scoping Plan to serve as an initial framework for how New York State will reduce greenhouse gas emissions and achieve net-zero emissions, increase renewable energy usage, and ensure climate justice. In outlining the recommended path for achieving the CLCPA targets, the Climate Action Council’s Draft Scoping Plan contemplates at least 20 GW of offshore wind by 2050.

Meeting these CLCPA targets through a substantial offshore wind build-out will undoubtedly require significant new investments in additional offshore and onshore grid infrastructure and constitutes a classic case of the policy-driven transmission needs solicited in NYIOS’s Request.

In its order of March 19, 2021, the NY Public Service Commission (“NY PSC”) assessed that New York State’s offshore wind procurements, in satisfaction of the CLCPA targets, were driving an “impending need for upgrades to onshore transmission facilities to assure that the offshore wind energy expected to be injected into New York City and Long Island can be distributed to the State at large.”³ Accordingly, the NY PSC concluded that there was a pressing public policy and technical imperative for increasing the export capability of the interface between the Long Island Power Authority and Con Edison territories (Zones K and J, respectively) to “ensure the full output from at least 3,000 MW of offshore wind is deliverable from Long Island to the rest of the State”.⁴ On the basis of this finding, the NYISO issued a solicitation on August 12, 2021, seeking proposals to address the Long Island Public Policy Transmission Need (“LI PPTN”). The NYISO is currently evaluating PPTN Project proposals and is expected to make its recommendation and NYISO Board decision in the first quarter of 2023. Should the LI PPTN process result in the selection of a viable, cost-effective and efficient solution, we believe it will provide real benefits to New York State energy consumers by unbottling offshore wind resources interconnecting to Zone K.

While LI PPTN represents a critical first step in the integration of offshore wind resources, the 2022 PPTN review cycle offers the next logical step in anticipatory planning, evaluating and prioritizing future transmission investments to enable the full potential of offshore wind resources needed to achieve the CLCPA mandates by 2050. For instance, the NY PSC identified “a potential solution” in the form of the Con Edison Brooklyn Clean Energy Hub⁵ and invited Con Edison to further explore it project concept. More recently, NY PSC and NYSERDA facilitated a public discussion and review of a number of additional proposed conceptual projects by developers, such as Rise L&P, AVANAGRID and LS Power/New York Power Authority, to integrate or interconnect offshore wind resources into Zone J.

³ See NY PSC Case No. 20-E-0497, et al.: *In the Matter of New York Independent System Operator, Inc.’s Proposed Public Policy Transmission Needs for Consideration for 2020*, Order Addressing Public Policy Requirements for Transmission Planning Purposes at 20 (issued and effective March 19, 2021) (“March 19, 2021 Order”).

⁴ March 19, 2021 Order at 23.

⁵ Con Edison has proposed to create eight new points of interconnection for offshore wind and other renewable projects.

NGV truly appreciates and welcomes the urgency and priority with which the Commission is acting to address the potential barriers to offshore wind injection, for both Zone K and J. We believe that this NYISO PPTN 2022-2023 planning cycle offers the NY PSC the opportunity to employ the long range scenario based planning developed by the NYISO with a specific focus on evaluating and defining the requirements for at least up to 20 GW of offshore wind and help advance holistic anticipatory transmission plans leading up to the PPR necessary for both onshore and offshore transmission elements, including a potential offshore meshed network, that together would result in the most cost-effective and efficient transmission for New York State's offshore wind resources.

As detailed above, NGV respectfully requests the evaluation of potential for transmission needs to be driven by the development of offshore wind resources of at least up to 20 GW. This request is being driven by the NY CLCPA mandates which outlines aggressive requirements for the reduction of carbon emissions and the development of alternative renewable resources over the next 20 years. NGV requests that NYISO consider this submission and forward it to the NY PSC for its consideration as part of the public policy driven transmission planning process.

Very truly yours,



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