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Electronic Mail
PublicPolicyPlanningMailbox@nyiso.com
New York Independent System Operator
10 Krey Boulevard
Rensselaer, New York 12144

RE: Response to Request for Proposed Transmission Needs Being Driven by Public Policy Requirements for the 2022-2023 Transmission Planning Cycle

Dear Sir/Madam:

In response to the New York Independent System Operator's ("NYISO") Request for Proposed Transmission Needs Being Driven by Public Policy Requirements for the 2022-2023 Transmission Planning Solicitation Notice, PSEG Long Island ("PSEGLI")¹ hereby submits this proposal regarding transmission needs driven by Public Policy Requirements ("PPRs") on Long Island.

On March 19, 2021, in accordance with the NYISO's 2020-21 Transmission Planning cycle, the New York Public Service Commission ("NYPSC") issued an order finding that New York's Climate Leadership and Community Protection Act ("CLCPA") constituted a Public Policy Requirement driving the need to increase transmission capability from Long Island into Southeastern New York to facilitate the delivery of offshore wind to the rest of the state ("LI PPTN").² The NYPSC referred this Public Policy Transmission Need to the NYISO to solicit and evaluate solutions. As of this writing, the NYISO is evaluating proposed solutions to address the LI PPTN. PSEGLI anticipates that any solution selected to address the LI PPTN would likely add transmission capacity both on-Island and between Long Island and other load zones, enabling the potential addition of at least 3,000 MW of offshore wind interconnecting in Long Island. Notably, NYISO's evaluation criteria include "expandability," *i.e.*, the extent to which a proposed project can support as much as 6,000 MW of offshore wind delivered to Zone K. NYISO has reported that its evaluation is expected to be completed in early 2023.

While the CLCPA called for 9,000 MW of offshore wind installed by 2035, ongoing studies indicate that significantly more offshore wind facilities will be required to achieve the State's goal of 100 percent emission-free generation.³ Accordingly, the CLCPA and Offshore Wind Standard continue to drive the need for transmission connecting Long Island to neighboring zones. However, the unfulfilled extent of that need will not be clear until a project(s) is selected in the current LI PPTN process. Moreover, in July 2022, NYSERDA issued a third solicitation

¹ PSEG Long Island is the Service Provider for the Long Island Power Authority.

² NYPSC Cases 20-E-0497 and 18-E-0623, "Order Addressing Public Policy Requirements for Transmission Planning Purposes," March 19, 2021.

³ See, for example, NYS Climate Action Council, Draft Scoping Plan, December 2021, page 74. The Draft Scoping Plan projects around 20 GW of offshore wind by 2050.

for offshore wind, with award announcements expected in the first quarter of 2023.⁴ Should offshore wind facilities selected through this solicitation propose to interconnect on Long Island, transmission selected in the current LI PPTN may not be sufficient to avoid curtailment of renewable energy. Additional transmission connecting Long Island to neighboring zones may be necessary to avoid curtailment of energy from offshore wind procured through this solicitation.

In addition, PSEGLI and LIPA are collaborating with the Joint Utilities (JU) on developing a statewide Coordinated Grid Planning Process (CGPP) to identify a least cost integrated resource plan to achieve CLCPA goals.⁵ The JU are collaborating with the NYISO to develop a process within the CGPP that will identify areas where bulk transmission additions may be part of a least cost solution to achieving CLCPA goals. Any such identified potential bulk transmission needs could be referred to the NYPSC. The NYPSC, in turn, may direct NYISO to issue a PPTN solicitation to address those needs.

PSEGLI recommends that the NYPSC incorporate into the 2022-23 public policy planning cycle the results of the NYISO LI OSW Export PPTN Solicitation and any results from the CGPP that may be available in 2023.

Respectfully,
Robert G. Grassi
Robert G. Grassi
Assistant Counsel-Regulatory

⁴ NYSERDA ORECRFP22-1 Schedule, found on NYSERDA web site at <https://www.nyserda.ny.gov/All-Programs/Offshore-Wind/Focus-Areas/Offshore-Wind-Solicitations/2022-Solicitation>.

⁵ The Utilities include Central Hudson Gas & Electric Corp. (Central Hudson); Consolidated Edison Company of New York, Inc. (CECONY); Long Island Power Authority (LIPA); Niagara Mohawk Power Corporation d/b/a National Grid (National Grid); New York State Electric & Gas Corporation (NYSEG); Orange & Rockland Utilities, Inc. (O&R); and Rochester Gas and Electric Corporation (RG&E) (collectively, Utilities). See the Utilities' filing in NYSPC Case 20-E-1097, "The Utilities' Coordinated Grid Planning Process and Revised Benefit Cost Analysis Proposals," December 17, 2021.