

To Whom It May Concern,

PSEG Long Island is providing herein the following suggestions for consideration by the New York Independent System Operator (NYISO) as part of NYISO's Evaluation and Selection (E&S) process under the NYISO Open Access Transmission Tariff (Tariff) and certain questions related to PPTN proposals for Long Island.

E&S Recommendations

- Transfer Interfaces
 - Assess impact of transfer capability on LIPA internal interfaces
- Controllable transmission
 - Assess potential impacts to operating capability of controllable transmission, *e.g.*, PARS and Neptune and Cross Island cables
- Asset Retirements, impacts to redundancy and operational flexibility
 - Assess the impact of the proposed retirement of several existing LIPA transmission facilities:
 - Reduction to operational flexibility.
 - Consideration of adverse impacts to maintenance or outage scenarios
 - Impact to existing LIPA Northport substation exit limitations
 - Conversion of EGC-Newbridge-Ruland 138kV to 345kV (138-467/567)
- Physical Expandability
 - Some proposals may limit or prevent future expandability of Long Island Power Authority (LIPA) substations that would have otherwise been feasible using property owned or controlled by LIPA. PSEG Long Island proposes that the NYISO evaluate the efficiency of such use considering potential limitations to future expandability of the LIPA electric system on remaining LIPA property and the mitigation of any such adverse impact to LIPAs ability to expand its substations in the future.
- Electrical expandability
 - To the extent OSW scenarios are developed or assumed outside of the already established Baseline Assessment or its Alternate Expanded Scenario, PSEG LI recommends load flow and bus flow analysis, respective to injection points, be conducted.
- Operability reduction impacts
 - Outage coordination and operating issues identified in support of Developer construction plans.
 - Schedule and timing requirements of any required LIPA facility outages
 - Maintenance considerations NYISO mentioned at the ESPWG.
 - Considering system limitations created under maintenance conditions as result of a proposal
 - The undue burden of coordination needed between the developer and Connecting Transmission Owner as it pertains to supporting clearances/outages

Requests and Questions

- Greater explanation of the comment on Risks to expandability because of specific POI requirements
 - NYISO noted that this PPTN examines the effect of generation that does not yet exist

- NYISO's POI assumptions for the PPTN VSA baseline cases assumed several representative POIs with an apparent goal of minimizing the impact on the system of specific POI injections
- Developers may have proposed a specific POI for some of the OSW in order for their project to pass the VSA
- If a specific POI for wind was required by a project for it to pass the VSA, would NYISO evaluate the risk of that POI being available for OSW in the injection amount the PPTN developer needed, since the created terminals would be subject to open access?
- Can the NYISO provide additional clarification on how the impacts of terminals subject to open access will impact the Evaluation and Selection?
- Where proposals developed a specific POI for future OSW as opposed to the VSA baseline, how will the NYISO look to capture respective risk or benefit as part of the E&S process.
- How will general issues (other than NUFs) that may come up in the SIS impact project ranking in the E&S?
 - Protection challenges: control house needs, short lines impacts, etc.
 - Property use challenges and configurations for NUFs found in the SIS
- Will LIPA-ConEd Wheel (901/903) at 300 MW toward Jamaica per Y-50 Agreement be included in each of the respective SIS?
 - If not, please explain why and how that might be incorporated in to the E&S