

March 27, 2023

**By Electronic Portal**

Honorable Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza Agency Building 3  
Albany, NY 12223-1350

Subject: Case No. 20-E-0197 - *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*

Dear Secretary Phillips:

Pursuant to the Notice of Proposed Rulemaking in “Proposal by Electric Utilities for a Coordinated Grid Planning Process,” published January 25, 2023 in the State Register, the New York Independent System Operator, Inc. encloses its comments in the above-entitled proceeding.

Respectfully submitted,

/s/ Brian R. Hodgdon

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Rensselaer, NY this 27<sup>th</sup> day of March 2023.

*/s/ Elizabeth Rilling*

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**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

CASE 20-E-0197 — *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*

**Comments of the New York Independent System Operator, Inc. on  
Proposal by Utilities for a Coordinated Grid Planning Process**

**INTRODUCTION**

The New York Independent System Operator, Inc. (“NYISO”) respectfully submits these comments in the above-captioned proceeding. These comments are in response to the New York State Public Service Commission’s (“Commission”) Notice of Proposed Rulemaking in “Proposal by Electric Utilities for a Coordinated Grid Planning Process” (I.D. No. PSC-04-23-00011-P) that was published in the New York State Register on January 25, 2023.

The NYISO continues to support the implementation of the Climate Leadership and Community Protection Act (“CLCPA”) of 2019<sup>1</sup> and the Accelerated Renewable Energy Growth and Community Benefit Act of 2020 (“Accelerated Renewable Energy Act” or “Act”).<sup>2</sup> The NYISO appreciates the extensive coordination by the Joint Utilities<sup>3</sup> with the New York State Department of Public Service (“DPS”), the New York State Energy Research and Development Authority (“NYSERDA”), and the NYISO in developing a proposal for a Coordinated Grid Planning Process (“CGPP Proposal”) to comply with the Accelerated Renewable Energy Act, which proposal was submitted by the Joint Utilities in their December 27, 2022 filing. The

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<sup>1</sup> 2019 Laws of New York, ch. 106. The CLCPA requires that seventy percent of energy consumed in New York State be produced by renewable resources by 2030. By 2040, the CLCPA requires that energy consumed in New York State must be completely emissions free.

<sup>2</sup> 2020 Laws of New York, ch. 58, part JJJ.

<sup>3</sup> The “Joint Utilities” include Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, Orange & Rockland Utilities, Inc., and Rochester Gas and Electric Corporation, in addition to the Long Island Power Authority.

NYISO also applauds the effort by the Joint Utilities, DPS, and NYSERDA in developing the CGPP Proposal and believes it will provide New York with another tool to advance transmission investments to achieve the mandates of the CLCPA.

The NYISO will continue to support the CGPP by serving as a member of the Energy Policy Planning Advisory Council (“EPPAC”) and will provide input and feedback, as permitted, in each cycle of the CGPP. In addition, the NYISO has committed to work with its stakeholders to estimate the additional resources that the NYISO may need to participate in the CGPP more actively in future cycles. For instance, the NYISO has a 2023 corporate project to identify additional resources to facilitate its support of future cycles of the CGPP and potential tariff or process changes to coordinate its processes with the CGPP. In that effort, the NYISO will work with its stakeholders to identify potential opportunities to revise its Public Policy Transmission Planning Process to, for example, facilitate the timely sharing of proposed Public Policy Transmission Projects when the Commission identifies a Public Policy Transmission Need related to a need identified in the CGPP cycle.

The NYISO offers the following comments on the CGPP Proposal that it believes will increase the efficacy and transparency of the CGPP and further the Commission’s aim of timely meeting the mandates of the CLCPA and Accelerated Renewable Energy Act.

## **BACKGROUND**

The Accelerated Renewable Energy Act directs the Commission to take action to address changes on New York State’s electric power grid to support the CLCPA mandate. The Accelerated Renewable Energy Act requires the Commission to conduct a “comprehensive study for the purpose of identifying distribution upgrades, local transmission upgrades, and bulk transmission investments that are necessary or appropriate to facilitate the timely achievement of

the CLCPA targets.”<sup>4</sup> The Act also directs the Commission to initiate two proceedings to advance the development of transmission investment identified through the study.<sup>5</sup> For purposes of the CGPP Proposal, one of the proceedings was focused on establishing a state-wide plan to identify and implement “bulk transmission system investments that the Commission determines are necessary or appropriate to achieve the CLCPA targets.”<sup>6</sup>

On May 14, 2020, the Commission directed the Joint Utilities to undertake planning assessments and develop investment proposals to modify their transmission facilities to facilitate the development of renewable resources while maintaining reliability of the transmission system.<sup>7</sup> The Commission also acknowledged in that order that one appropriate pathway for the achievement of the bulk transmission system investments is through the NYISO’s Public Policy Transmission Planning Process.<sup>8</sup> To comply with the May 2020 order, the Joint Utilities submitted their proposal on November 2, 2020, which included a set of transmission investment and prioritization criteria, a benefit-cost analysis framework for assessing projects, and cost allocation proposals.<sup>9</sup> The proposal differentiated between Phase 1 and Phase 2 “local transmission and distribution” (“LT&D”) projects, with Phase 2 projects designed to address needs primarily driven to achieve the CLCPA targets.

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<sup>4</sup> Accelerated Renewable Act § 7(2). The Commission’s assessment was commonly referred to as the “Power Grid Study.”

<sup>5</sup> *Id.* § 7(3), (4).

<sup>6</sup> *Id.* § 7(4).

<sup>7</sup> Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Order on Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act (May 14, 2020), at pp 3-4.

<sup>8</sup> *Id.* at 4.

<sup>9</sup> Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Utility Transmission and Distribution Investment Working Group Report (November 2, 2020).

On September 9, 2021, the Commission issued an order on the Joint Utilities' efforts in the development of the Phase 2 LT&D planning process.<sup>10</sup> In compliance with that order, the Joint Utilities filed, among other things, the initial CGPP framework on December 17, 2021, which established the basis tenants of the CGPP with a commitment to provide a more comprehensive proposal by January 1, 2023. After extensive work and coordination with DPS, NYSERDA, and the NYISO, the Joint Utilities filed the current CGPP Proposal on December 27, 2022.

Relevant to the NYISO's comments, the CGPP is proposed to be a 3-year process that uses a 20-year planning horizon and that identifies grid expansions, including bulk transmission facilities, to advance CLCPA objectives and to complement the NYISO's Comprehensive System Planning Process ("CSPP") and individual utility's LT&D planning processes. The CGPP will assess the transmission system and CLCPA needs, identify a portfolio of LT&D projects, assess the portfolio of LT&D projects against alternative bulk projects, and prepare a CGPP report for consideration by the Commission. The CGPP Proposal notes that there will be opportunities for certain stakeholder review and input, such as the assumptions used in the initial stage of the CGPP, the results of scenario development, and "potentially, other materials that can be made public at various stages throughout the process."<sup>11</sup> The CGPP Proposal provides that stakeholder review and input will be provided through the EPPAC, which serves a technical advisory role to provide meaningful impact on the analysis performed in the CGPP.

The CGPP, as proposed by the Joint Utilities, is divided into six stages, which are summarized as follows:

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<sup>10</sup> Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Order on Local Transmission and Distribution Planning Process and Phase 2 Project Proposals (September 9, 2021).

<sup>11</sup> CGPP Proposal at p 7.

- **Stage 1** – Collect data, perform capacity expansion simulations for up to three scenarios, and identify three generation build-out plans with input from the EPPAC. The Joint Utilities also propose that based on the results of this stage, DPS Staff, in consultation with the EPPAC, can propose a bulk transmission need to the Commission for it to identify as a Public Policy Transmission Need in the NYISO’s Public Policy Transmission Planning Process.
- **Stage 2** – Develop a network model that will be used in subsequent stages to assess the local transmission systems.
- **Stage 3** – Assess local transmission systems based on short circuit and power flow analyses to determine limitations on the local system and identify an initial portfolio of utility-proposed solutions to accommodate the projected built-out.
- **Stage 4** – Review of the portfolio of solutions, with opportunity for the Joint Utilities to perform cost-effective scope combinations or reductions of the individual utility solutions. In this stage, information from the NYISO’s Public Policy Transmission Planning Process on viable and sufficient Public Policy Transmission Projects will be shared for inclusion in the CGPP.
- **Stage 5** – Assess and identify the “least cost” portfolio of LT&D and bulk transmission projects that facilitate the achievement of the New York State’s policy objectives by comparing the utilities’ portfolio against any viable and sufficient bulk projects identified in the NYISO’s Public Policy Transmission Planning Process.

- **Stage 6** – Prepare the CGPP report, which will identify and rank the portfolio of solutions based on the headroom created and will also identify proposed solutions in the NYISO’s Public Policy Transmission Planning Process that were not found to be the least cost compared to the utilities’ portfolio of projects.

The Joint Utilities propose that the first cycle of the CGPP will begin in mid-2023 following a timely order from the Commission on the CGPP Proposal.

## COMMENTS

### **A. The Commission Should Consider the Effectiveness of Comparing Alternative Bulk Transmission Solutions Against Local Transmission Solutions Based Capacity Expansion Analysis to Identify the Least Cost Solution**

Achieving New York’s policy objectives will require additional transmission capability to facilitate the interconnection and delivery of renewable resources to consumers. The NYISO appreciates the effort to date by the Commission and DPS to establish a uniform method for the utilities to identify high-priority and high-value locations for targeted non-bulk transmission development. The NYISO’s comments on the Power Grid Study on March 22, 2021 noted that further coordination between the Transmission Owners’ planning processes and the NYISO’s planning process will assist in achieving the CLCPA mandates.<sup>12</sup> The proposed CGPP and the NYISO’s CSPP can provide non-exclusive, complementary tools that the Commission can use to meet the transmission capability necessary to satisfy the mandates of the CLCPA and Accelerated Renewable Energy Act.

The NYISO supports the Joint Utilities’ approach to use the Public Policy Transmission

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<sup>12</sup> Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Comments of the New York Independent System Operator, Inc. on Initial Report of the Power Grid Study and Department of Public Service Staff Questions (March 21, 2021), at pp 19-35.



Planning Process to identify bulk transmission investments that will address transmission needs identified through the CGPP. However, the Commission should consider whether the CGPP's evaluation methodologies and criteria will result in meaningful consideration of alternative bulk transmission solutions when those solutions are designed to a standard that assesses, based on a variety of metrics, both the cost-effectiveness and efficiency of the transmission investments to achieve the CLCPA targets.

The CGPP proposes to use capacity expansion to identify the least cost solution to a transmission need in identifying a preferred solution under the CLCPA. However, the proposed alternative bulk solutions that would be evaluated in Stage 5 of the CGPP will be designed to the evaluation methodologies and criteria in the NYISO's Public Policy Transmission Planning Process. Specifically, the NYISO's process evaluates proposed solutions to transmission needs related to the bulk system driven by Public Policy Requirements based on broad set of metrics. Such metrics include cost, cost containment, performance, expandability, operability, risk to project completion, and other criteria specified by the Commission in its order or through the NYISO's coordination with stakeholders. The NYISO is required to evaluate those metrics to identify the more efficient and cost-effective solution to the Public Policy Transmission Need.

The differences between the methodologies and criteria have the potential to reduce the meaningfulness of the alternative bulk transmission solutions by only identifying the least cost, local transmission solutions. Depending on the specifics of the scenario, this could result in solutions that are less favorable for ratepayers in the long term. A least cost solution approach based on capacity expansion will only consider part of the methodology and criteria employed by the NYISO in the Public Policy Transmission Planning Process, as well as the Transmission Owners in the Local Transmission Owner Planning Process ("LTPP") for local transmission

needs driven by Public Policy Requirements.<sup>13</sup> This could result in missed opportunities for the selection of transmission solutions that may either more efficiently or cost-effectively achieve the CLCPA targets, as well as other transmission needs, in the long term. Moreover, if transmission developers believe that there are limited opportunities for an alternative bulk transmission solution to proceed to selection in the NYISO's Public Policy Transmission Planning Process based on the methodology and criterion employed in the CGPP, there may be fewer and fewer alternative bulk transmission solutions over time for consideration in a CGPP cycle. The NYISO encourages the Commission to consider the differences in the evaluation methodology and criteria for the proposed CGPP and the NYISO's CSPP to ensure a robust and meaningful process that leverages the available transmission planning tools to achieve the CLCPA targets.

**B. The Commission Should Expand Stakeholder Participation and Transparency in the CGPP Proposal**

In its September 2021 order, the Commission required the CGPP to leverage working group forums “to share insights and help resolve issues through group collaboration, to the fullest extent possible.”<sup>14</sup> The Joint Utilities propose to involve the EPPAC to provide input during the initial stage of the CGPP, as well as in Stages 5 and 6. The Joint Utilities also note that there will be opportunities for additional technical feedback from the EPPAC during Stage 2, 3, and 4. The NYISO supports the involvement of the EPPAC during the various stages of the CGPP, including technical conferences at each stage of the process.

The NYISO has a long history of working with utilities, power producers, consumers,

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<sup>13</sup> The discussion of the evaluation methodology and criteria employed by the Transmission Owners in the LTPP is further discussed in Part E, below.

<sup>14</sup> Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Order on Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act (September 8, 2021), at 21.

state agencies, consumer and environmental interests, and other stakeholders in a shared governance process to achieve its mission and objectives. The result is that entities and individuals with varying interests can share and debate issues in an open and transparent process to produce collaborative outcomes. Based on the NYISO's experience in working with its stakeholders in its shared governance process, the following considerations may further advance the collaboration and input of the EPPAC in the CGPP to efficiently and timely achieve the CLCPA goals.

1. Expand the Membership in the Energy Policy Planning Advisory Council

The Joint Utilities propose that the EPPAC will represent stakeholder interests from across the state and provide input and feedback on assumptions and the technical approach used in the CGPP analysis.<sup>15</sup> The proposed EPPAC membership is largely composed of public power and environmental parties, generator owners, and public utilities, as well as the NYISO, as an independent entity, and the New York City Mayor's Office of Climate and Environmental Justice.<sup>16</sup>

The NYISO encourages the Commission to expand the membership to include a broader group of entities and individuals, such as consumer interest groups and other interested parties related to transmission development. The NYISO appreciates that the purpose of the EPPAC is for technical discussion. However, in the NYISO's experience, many entities provide valuable viewpoints that while not technical, directly influence technical issues and provide for a more robust and collaborative process. Moreover, early resolution of issues—either technical or otherwise—will reduce the potential of delays in the development of transmission solutions that could result if entities or individuals have to wait until the Commission seeks comments through

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<sup>15</sup> CGPP Proposal at p 6.

<sup>16</sup> CGPP Proposal at p 10.

the State Administrative Procedures Act to provide their input and suggestions.

2. Further Define the Participation of the EPPAC and Interested Parties through All CGPP Stages

The NYISO supports the involvement of the EPPAC during the various stages of the CGPP, including technical conferences at each stage of the process. However, the NYISO encourages the Commission to require that the CGPP include greater specificity on (i) the timing and information that will be shared with the EPPAC during each stage, (ii) the nature and level of collaboration between the Joint Utilities and the EPPAC (*i.e.*, how input and feedback must be considered by the Joint Utilities), and (iii) the method to resolve issues related to the EPPAC's input and feedback.<sup>17</sup> For instance, the CGPP Proposal notes that the Joint Utilities will host technical conferences during Stages 2, 3, and 4, but the proposal is unclear about when technical conferences will be held, the details from the stage that will be shared, and how and if the feedback from those conferences will be incorporated into the cycle of the CGPP. Moreover, the CGPP Proposal does not fully specify the EPPAC's role in Stage 5, which assesses the utilities' portfolio of local solutions against bulk alternatives, or Stage 6, which produces the CGPP report for the cycle. Based on the technical expertise of the EPPAC, these two stages are an appropriate stage for the EPPAC to have a formal role in the process, as well as Stage 4 when the Joint Utilities review the preferred solutions through a qualitative review of the portfolio of solutions. The dialogue should seek to address concerns early in the process and offer potential solutions based on differing perspectives in an open and transparent manner. The NYISO encourages the Commission to consider the level of stakeholder involvement in the CGPP

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<sup>17</sup> The CGPP Proposal requests the Commission to have DPS Staff resolve disagreements among EPPAC members "in the case that EPPAC is unable to reach consensus on the specification of scenarios." CGPP Proposal at p 8 n 12. There are, however, other areas that can result in disagreement among the EPPAC members or between the EPPAC members and the Joint Utilities.

Proposal to provide an ongoing, collaborative discussion with feedback on the inputs, results, and recommendations, as well as specific procedures to clearly identify how the feedback is provided and how disputes are resolved.

**C. The Commission Should Consider Greater Detail in Defining the Identification of Bulk Transmission Needs Based on the CGPP Sensitivity Work**

The Joint Utilities propose to use the CGPP for identifying local transmission needs for which they will develop a portfolio of transmission solutions to address the needs. They also propose to perform capacity expansion sensitivity analysis by relaxing interzonal limits to determine whether there could be bulk solutions to address the transmission needs in a less costly manner.<sup>18</sup> The CGPP Proposal states that “[t]he results of this sensitivity analysis—with other assumptions held constant—may inform the need to consider expansion of the bulk system.”<sup>19</sup> If the EPPAC agrees, DPS Staff will to make a recommendation to the Commission to identify a Public Policy Transmission Need.<sup>20</sup>

The NYISO supports DPS Staff making recommendations to the Commission where a transmission need related to the bulk system can more efficiently or cost-effectively address local needs related to the CLCPA targets.<sup>21</sup> However, the CGPP Proposal would establish a limited scope of the situations in which alternative bulk transmission solutions can be used to address the local transmission needs to achieve the CLCPA mandates. For example, the current proposed methodology does not address a situation where there are specific local transmission needs in more than one neighboring Transmission District (either related or unrelated) and a

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<sup>18</sup> GCPP Proposal at p 18.

<sup>19</sup> *Id.*

<sup>20</sup> *Id.* at p 19.

<sup>21</sup> The NYISO also encourages the Commission to consider whether there is sufficient time in the CGPP Proposal from the time that DPS Staff recommends to the PSC to identify a Public Policy Transmission Need to the NYISO’s completion of the viability and sufficiency assessment for the alternative bulk transmission solutions to serve as a timely feed in to the CGPP.

regional transmission solution can more efficiently or cost-effectively resolve both needs. The NYISO encourages the Commission to consider the scope of scenarios in which it makes sense for DPS Staff to recommend that the Commission identify a Public Policy Transmission Need. Moreover, defined criteria to help guide the EPPAC in making the recommendation to DPS Staff will provide clearer workstreams and avoid a preference for local transmission solutions where a regional solution can more efficiently achieve the CLCPA targets and benefit ratepayers in the long term.

**D. The Commission Should Require Clear Criteria in Prioritizing the Preferred Solutions under the CGPP**

The Joint Utilities propose that the CGPP will be conducted on a 20-year planning horizon. The Joint Utilities further propose that each CGPP cycle “builds on prior assessments and eliminates ambiguity regarding project status in subsequent CGPP cycles.”<sup>22</sup> However, the CGPP Proposal does not specify the criteria that will be used in prioritizing solutions in Stage 4 to provide a consistent approach to long-term planning in light of the rapidly changing energy and technology landscape.

The NYISO encourages the Commission to require clear criteria for the prioritization of solutions in a multifaceted planning process. For instance, the actual construction of the approved transmission solutions will take several years to be built and there will necessarily be a phasing approach in order for the solutions to be in service by the specific need that they are seeking to address. As CGPP cycles build on each other, the NYISO encourages the Commission to take an opportunity at the outset to define how projects are phased through the cycles of the CGPP.

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<sup>22</sup> CGPP Proposal at p 12.

**E. The CGPP Proposal Should Further Detail the Coordination of the CGPP and LTPP and Leverage Opportunities for Enhanced Coordination**

Attachment Y of the NYISO’s Open Access Transmission Tariff (“OATT”) contains the LTPP. The Joint Utilities, as Transmission Owners defined under the OATT, are required to plan their local transmission systems using the LTPP to comply with the planning principles under Order No. 890 and the requirements under Order No. 1000.<sup>23</sup> The LTPP produces a Local Transmission Owner Plan (“LTP”) that then feeds into the CSPP to produce regional transmission plans for the New York Control Area. The Joint Utilities note in their proposal that the transmission solutions identified in a CGPP report and subsequently approved by the Commission will be included in the Transmission Owners’ LTP updates.<sup>24</sup> However, the proposal does not explain how the timing and various requirements under the LTPP will be coordinated and satisfied by the CGPP Proposal. The NYISO encourages the Commission to require the Joint Utilities to further detail how the CGPP Proposal will be coordinated and aligned with the LTPP.

Each Transmission Owner is responsible for administering the LTPP for its respective Transmission District, which includes providing its LTP for stakeholder input.<sup>25</sup> Such administration requires maintaining a website that contains, among other things, the LTP, a description of the needs addressed by the LTP, and the assumptions, planning criteria,

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<sup>23</sup> See generally, *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, order on reh’g, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), order on reh’g, Order No. 890-B, 123 FERC ¶ 61,299 (2008), order on reh’g, Order No. 890-C, 126 FERC ¶ 61,228, order on clarification, Order No. 890-D, 129 FERC ¶ 61,126 (2009); *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, 136 FERC ¶ 61,051 (2011) (“Order No. 1000”), order on reh’g and clarification, Order No. 1000-A, 139 FERC ¶ 61,132 (2012), order on reh’g and clarification, 141 FERC ¶ 61,044 (2012).

<sup>24</sup> CGPP Proposal, at p 36. The Commission has noted that the CLCPA is a Public Policy Requirement that has driven the need for transmission development—e.g., offshore wind generating resources. See Case No. 20-E-0497, *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 (March 19, 2021), at p 27.

<sup>25</sup> NYISO OATT § 31.1.3.

methodology, and consideration of Public Policy Requirements, as applicable.<sup>26</sup> Moreover, the LTPP requires that any local transmission solution identified by the Transmission Owner must be reviewed with stakeholders as part of each Transmission Owner’s regular LTP update process. The LTPP also provides for a dispute resolution process following a Transmission Owner’s presentation of its LTP at the NYISO’s Electric System Planning Working Group (“ESPWG”) or Transmission Planning Advisory Subcommittee (“TPAS”), which involves an attempt to resolve disputes before the stakeholders at the ESPWG and TPAS.

Detailing how and when the assumptions and needs derived from the work by the Joint Utilities with the EPPAC will be made available to stakeholders through the LTPP will increase the transparency of the processes and their interactions.<sup>27</sup> For example, the CGPP is proposed to be performed on a three-year basis beginning in mid-2023 with the identification of needs, evaluation of proposed solutions, and selection of solutions be performed within two years. The next biennial LTPP is set to begin in November of 2023. While there are opportunities to coordinate the CGPP cycle with the biennial LTPP update, the current proposal does not clearly articulate how the timing of the two processes will be aligned.

The Joint Utilities should also consider when planning criteria and assumptions from a CGPP cycle will be posted on the individual Transmission Owner’s website in order to take into consideration comments from customers, Market Participants, and other interested parties.<sup>28</sup> For example, the Joint Utilities should detail how stakeholders will have an adequate opportunity to provide feedback and raise disputes as required by the LTPP. NYISO customers, Market

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<sup>26</sup> NYISO OATT § 31.2.1.1.1.

<sup>27</sup> As explained in Part B above, there are opportunities for increased transparency in the CGPP Proposal. Such opportunities could include leveraging the requirements to post planning criteria, assumptions, and LTPs and coordinate with interested parties through the LTPP when information becomes available at various stages of the CGPP.

<sup>28</sup> NYISO OATT § 32.1.1.1.



Participants and other interested parties not involved in the EPPAC will not have the same level of information on the assumptions and criteria used in the CGPP. Moreover, if the Commission approves the preferred solutions in a CGPP report and those are then included in a subsequent LTP, the interested party may arguably miss its opportunity to effectively challenge a proposed solution or reach a mutually agreeable position with the utilities since the Commission has already acted.

### CONCLUSION

The NYISO commends the work by the Joint Utilities, DPS, and NYSERDA on the CGPP Proposal as a forward step in planning for the additional transmission infrastructure that is necessary to achieve New York State's policy targets under the CLCPA and the Accelerated Renewable Energy Act. The NYISO requests the Commission to consider its comments in finalizing the CGPP Proposal to fully employ available transmission planning processes to address the state's infrastructure needs for the benefit of ratepayers.

Respectfully submitted,

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March 27, 2023