

Con Edison Comments on Developer Proposals

To assist NYISO with its evaluation of Public Policy Transmission Projects submitted in response to the Long Island Offshore Wind Export Public Policy Transmission Need, Con Edison provides these comments on the impacts of the proposed projects to the Con Edison local transmission system. Con Edison asks that the NYISO review these concerns and consider them in developing independent cost estimates for the project and evaluating relevant evaluation metrics (e.g., expandability, operability). No project should be selected that violates Con Edison design criteria or otherwise imperils reliability, including the reliability of Con Edison's local system.

- The developer cannot install equipment that interferes with operation, maintenance, and future replacement of existing substation equipment.
 - The existing access roads must remain useable by Con Edison. Any equipment running overhead must use a design that maintains clear access to Con Edison's right of way.
 - The proposed location of facilities cannot interfere with access and paths needed for future removal and reinstallation of equipment particularly along the perimeter of the substation.
 - The final design should consider the possibility that any piece of equipment to be installed may fail. The equipment should be arranged so that such a failure will disrupt the station to the least possible extent and not jeopardize station nor system reliability. Particular attention should be made toward the space requirements for on-site repair, maintenance activities of existing equipment, or removal of any failed equipment.
 - Should Con Edison and the Developer fail to reach an agreement on rights to Con Edison-owned land, there could be a significant impact to the estimated cost of the project and the NYISO should consider this in their evaluation.
- It should be taken into account that when transmission lines are intercepted by a breaker-and-half substation, the standard approach is to keep two portions of the same transmission line in the same bay. This ensures that a single stuck breaker contingency does not take multiple transmission paths out of service.
- Developer proposed timelines should be carefully reviewed given the amount of outage coordination, construction, reliability, and procurement challenges involved with some of the proposals.
 - Several upgrade facilities as proposed will be constructed in the right of way (ROW) owned by Con Edison. There are existing overhead feeders in the ROW that may be required to be taken out of service during the project construction period. In addition, there are logistical and outage related challenges associated with intercepting lines given overhead congestion in Con Edison's service territory. A specific concern is contingency planning to address the potential for overhead transmission lines to cross. The NYISO should take into consideration logistics, outage scheduling requirements and the impacts on the constructability and scheduling accuracy of the proposals.
- Some of Con Edison's substations have limited physical space for expansion. The NYISO should take into consideration that, if interconnection studies dictate the need to use larger devices compared to those proposed by developers, these changes could impact the physical feasibility of the project.

- Any proposed device that is capable of regulating power flows should be evaluated for impacts on the existing system and whether it could cause issues at load serving substations. There may be potential adverse reliability impacts and the NYISO should consider this as a possible issue in the evaluation.