



February 16, 2023

Via Electronic Mail

PublicPolicyPlanningMailbox@nyiso.com

New York Independent System Operator, Inc.

Re: Propel NY Energy Comments Regarding 02-08-2023 LI OSW Export PPTN Power Flow Results

Introduction

Propel NY Energy (Propel) offers the following comments as a follow-up to direction provided by staff of the New York Independent System Operator (NYISO) at the ESPWG/TPAS meeting held on February 8, 2023. At that meeting, NYISO presented preliminary power flow results of all proposals, in terms of transfer analysis, electrical expandability and operability. Propel's comments are the following.

Modified OSW injection points for Alternate Solution 6 and 7: In accordance with guidance provided by the NYISO in response to LIPPTN-Supplemental FAQ Question 11 released on September 12, 2021, the Propel team proposed alternate OSW injection points as for couple of its proposals as follows:

- Alternate Solution 6 (AS6) (1,150MW from Northport 138kV to New Shore Road 345kV) and,
- Alternate Solution 7 (AS7) (1,150MW from EGC to Barrett 345kV, 1,150MW from Northport 138kV to New Northport 345kV).

Propel incorporated sophisticated design elements into AS6 and AS7, and strongly believes that analyzing the impact on transfer limits of the modified OSW injection points is appropriate to fully understand the capability of these proposals. Therefore, Propel requests that NYISO analyze the transfer limits for these Propel proposals utilizing the modified OSW injection points, consistent with NYISO's guidance.

Electrical Expandability: In analyzing the data on electrical expandability we question why Propel AS5 OSW capability numbers in the summer peak case for N-1 and N-1-1 (Page 18) are lower than those for Propel BS1. The light load case shows better performance for Propel AS5 as compared to Propel BS1, as to be expected, since compared with Propel BS1, Propel AS5 added to the Propel BS1 proposal, one controllable tie and additional system reinforcements.

Operability: Propel recommends that the NYISO consider using single outage and N-1 instead of double outage and N-1-1 results in evaluating operability metric. Single outage should be used because this occurs most often in real time operation of the system, as compared to a double outage condition which happens with much lower probability.



Conclusion

Propel is concerned that NYISO has not afforded sufficient time to meaningfully review NYISO's load flow analysis to replicate NYISO's results and understand divergences between the NYISO and Propel findings. Propel believes it is critical that the ultimate analysis accurately reflect its Proposals and is working diligently to review the NYISO analysis. Accordingly, Propel expects to supplement these comments and encourages NYISO to ensure that its objective to move the process quickly not undermine the accuracy of the analysis.

Propel appreciates the opportunity to share its views with NYISO and looks forward to reviewing NYISO's further project evaluations. If NYISO wishes to discuss these comments, please do not hesitate to contact either of the signatories below.

A handwritten signature in black ink, appearing to read "G. Behal", written over a horizontal line.

Girish Behal
VP Projects and Business Development
NYPA

A handwritten signature in black ink, appearing to read "Paul Haering", written over a horizontal line.

Paul Haering
VP Capital Investment
NY Transco LLC