

To Whom it May Concern,

PSEG Long Island on behalf of LIPA, thanks the NYISO for the presentations on February 8, 2023 and February 16, 2023 on the results of evaluations of the projects in the Long Island Offshore Wind Export PPTN. We respectfully submit the following comments on the Long Island Offshore Wind Export PPTN: Production Cost & Capacity Benefit Results presentation from the February 16, 2023 ESPWG/TPAS meeting.

On the Barrett – Valley Stream Scenario, slide 26:

PSEGLI/LIPA agrees with the argument that the Barrett to Valley Stream lines constraint should be relaxed in evaluations of the Long Island Offshore Wind Export PPTN on the assumption that the Barrett Offshore Wind project would be responsible for the local deliverability upgrades and not the Public Policy Transmission Project. This follows the exemption of these lines from the sufficiency criteria in the Long Island Offshore Wind Export PPTN Project Solicitation dated August 12, 2021. We also agree with the benefit of pursuing a sensitivity scenario assuming that the circuit is still constraining for information on the constraint; but not to be considered in the project selection. We advise caution on how any observed benefits from this scenario are presented, noting that these lines were excluded from the sufficiency criteria and developers submitting projects were not required to resolve constraints on those lines.

We note that NYISO determined that the constrained paths exiting the Barrett substation would need to be resolved by the developer pursuant to the NYISO LGIP. NYSERDA's selection of the Offshore Wind project predates the declaration of the need for the Long Island Offshore Wind Export PPTN. It is important to ensure that ratepayers are not paying twice for upgrades that could have been reasonably anticipated as part of an offshore wind proposal to NYSERDA.

On LI Transmission Utilization, slide 38:

Could the NYISO provide a breakdown of imports and exports to and from Long Island by each zone and other control area? It would be helpful to know if there are significant imports and exports to other control areas if the goal was to unbottle Long Island Offshore Wind to export to the rest of the NYCA.

On CO2 Emission Impacts in the Policy Case, slide 39:

Could the NYISO provide information on what fossil units, and the respective amount of energy, were dispatched on Long Island?

What is the annual distribution of CO2 impacts over the 20 year period?

Thank you for your time and consideration of our comments. We look forward to reviewing and discussing the remainder of the Long Island Offshore Wind Export PPTN evaluation results in future presentations.