

February 23, 2023

Public Policy Transmission Planning
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144

By e-mail to PublicPolicyPlanningMailbox@nyiso.com

LS Power Grid New York Corporation I ("LS Power") submits the following comments to the Long Island offshore Wind Export PPTN: Power Flow Results presented at the February 16th, 2023 ESPWG/TPAS in response to the Production Cost & Capacity Benefit metrics under consideration by NYISO.

OSW interconnection injection points on Long Island should be adjusted

NYISO should modify the Long Island OSW injection points in the Policy Case to minimize curtailment for each solution consistent with the power flow modeling analysis¹ presented on February 8th. As presented, the Policy Case results are not optimized for each project and the generic OSW injection points appear to bias the results.

For example, to the extent that TO35 is selected, OSW generation interconnecting in years 2030 and later would have additional interconnection points resulting from TO35 going into service. The interconnection points at Longshore and Southgate may be stronger points of interconnection than the generic assumptions for the Alternate Case. To continue to produce meaningful study results, study methodologies need to be consistent throughout the evaluation process. NYISO could simply take the results from the power flow analysis, which has already identified optimal injection points of OSW for each project and re-run the production cost simulations.

Barrett – Valley Stream Scenario

LS Power supports additional analysis of the Barrett – Valley Stream Scenario. Since the specific SUFs related to this path are known and have the potential to not entirely relax the constraint on the path, it is appropriate to further analyze the scenario. In addition, NYISO should consider the benefit of the potential for a portion of the costs of each proposal to be paid for by Q958/959, to the extent a proposal provides potential savings in the form of avoided SUF costs.

Sincerely,

Tim Lundin
Regulatory Policy Manager

¹ Long Island Offshore Wind Export PPTN: Power Flow Results February 8, 2023, slide 18.

https://www.nyiso.com/documents/20142/36100021/06_LI_PPTN_ESPWG_2023-02-08.pdf/b9a4fad8-4a78-f20e-04bb-e85f72e6604a