

February 23, 2023

Via Electronic Mail

PublicPolicyPlanningMailbox@nyiso.com

New York Independent System Operator, Inc.

Re: Propel NY Energy Comments Regarding 02-16-2023 LI OSW Export PPTN Production Cost & Capacity Benefit 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 16, 2023. At that meeting, NYISO presented preliminary production cost, performance and capacity benefit results of all proposals. Given the very limited time Propel has been given to review the analysis, we have attempted to identify the most significant issues known at this point, but we reserve the right to provide additional comments on the information presented at the February 16, 2023 ESPWG/TPAS meeting as the process continues. Propel's initial comments are as follows:

Most Limiting Constraints for Curtailment: In analyzing the data provided by NYISO related to Production Costs, there are some discrepancies between NYISO's and Propel's findings/study results. To better understand these divergences, Propel requests NYISO to provide the top ten (10) most Long Island constraint elements for all of Propel's solutions.

LOLE Saving: Page 47 of NYISO's February 16, 2023, presentation indicated that NYISO used a CRI of \$0.8M per 0.001 LOLE to calculate annual capacity benefit calculation (lower range of \$0.8M - \$2.5M). However, Propel suggests using mid-range unit value for LOLE savings as this is the typical method for computing an estimate with a range of data points.

Utilization: During the February 16 presentation by NYISO, a Propel representative requested a clarification related to NYISO's use of the term "LI Transmission Utilization" in the presentation, specifically on page 38. NYISO staff responded that the chart represents "energy flow on and off of Long Island." Given this response, Propel suggests NYISO use a different term to avoid confusion such as "Energy Exchange on LI Transmission Interties" or equivalent terminology.

Conclusion

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.


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