



April 19, 2023

Via Electronic Mail

PublicPolicyPlanningMailbox@nyiso.com

New York Independent System Operator, Inc.

Re: Propel NY Energy Comments Regarding Long Island Offshore Wind Export Public Policy Transmission Need Evaluation

Introduction

Propel NY Energy (Propel) offers the following comments on the Long Island Offshore Wind Export Public Policy Transmission Need Evaluation presented by NYISO at its ESPWG meeting on April 12, 2023. Given the very limited time to review the results, these comments focus on the most significant issue as identified below. Propel reserves the right to provide additional comments as the process continues.

Propel's comment is related to the Constraint Reliability Margin (CRM) value used in NYISO's operability assessment of the projects. The NYISO assumed a fixed 600 MW CRM for all solutions. However, Propel asserts that a larger CRM value must be used for solutions that use any form of DC (partially or completely) to account for the need for larger reserve power transfer capability on the AC ties due to non-responsiveness of the DC lines immediately after a contingency. Propel recommends that NYISO reconsiders the CRM value to be used for the applicable DC solutions.

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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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