

Proposed Transmission Needs Being Driven by Public Policy Requirements

Indicated New York Transmission Owners¹

NYISO Electric System Planning Working Group

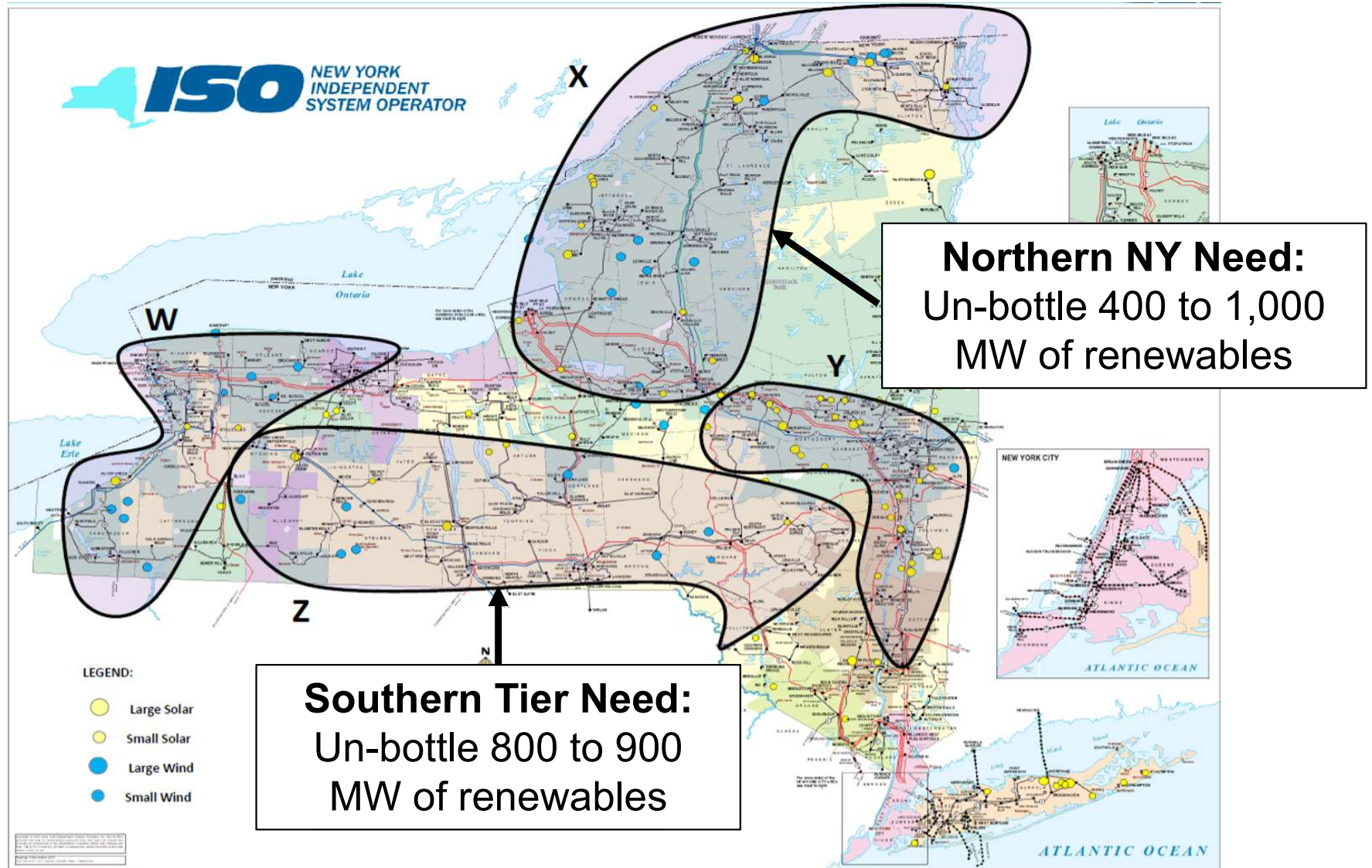
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¹ For purposes of these comments, the NYTOs include: Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; Niagara Mohawk Power Corporation d/b/a National Grid; New York Power Authority; New York State Electric & Gas Corporation; Orange & Rockland Utilities, Inc.; and Rochester Gas & Electric Corporation.

Public Policy Requirements Driving Growth in Renewables Upstate

- Clean Energy Standard (CES)
 - 50% of the electricity used in New York to be generated by renewable sources by 2030
- New York City Objectives:
 - 80% reduction in the City’s greenhouse gas emissions by 2050
 - 40% reduction in such emissions from the City government by 2030
- NYISO July 2018 study, *Public Policy Transmission Needs Study: Transmission Constrained Renewable Generation Pockets*, found:
 - “a need for transmission upgrades in order to transmit the full power from the renewable generation pockets to NYCA load to achieve the CES.”

Transmission Needs driven by Upstate Wind and Solar



Identification of Public Policy Transmission Needs

- NYISO is in the best position to interpret its study and therefore should identify needs based on its study results for the NYPSC.
- NYPSC should consider declaring Needs in both Northern NY and the Southern Tier.
- Developers will have the flexibility to propose a range of solutions to the identified Needs.

Treatment of Non-Bulk Upgrades

- Non-bulk upgrades should be assigned to the local transmission owner
 - For bulk system Needs, the NYPSC should contemporaneously identify common upgrades to non-bulk facilities required to satisfy the Need and assign to the local transmission owner
 - Local transmission owner should identify the non-bulk upgrades for Needs exclusively on non-bulk system
- Provides clarity to both developers and transmission owners

Integrating Offshore Wind

- State goal to develop 2,400 MW of offshore wind by 2030
 - Phase 1 to procure 800 MW in 2018-2019, online in 2024-2025
 - Phase 2 to procure remaining 1,600 MW, online in 2027-2030
- Common backbone transmission and interconnection infrastructure for offshore wind is required to make the State's goal cost effective and feasible
 - Phase 1 timing may preclude consideration of common transmission infrastructure
 - However, it should be considered as the preferred approach for Phase 2
- The NYPSC should consider the use of the public policy transmission process as well as other options it may have available