



May 2, 2023

Via Electronic Mail

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New York Independent System Operator, Inc.

Re: Propel NY Energy Comments Regarding Long Island Offshore Wind Export Public Policy Transmission Need Evaluation - Draft Report Appendices.

### **Introduction**

Propel NY Energy (Propel) offers the following comments on the Long Island Offshore Wind Export Public Policy Transmission Need Evaluation Report Appendices Issued by the NYISO and the follow-up ESPWG meeting presentation by NYISO on April 25, 2023. Given the very limited time to review the Draft Report Appendices, Propel's comments focus on the most significant issues identified at this point. Propel reserves the right to provide additional comments as the process continues.

1. Propel previously provided the comments noted below via several comment letters, which are not addressed in the newly released documents and requests NYISO to re-evaluate related topics prior to updating related draft reports.
  - Physical expandability of Propel proposals, comment letters submitted on March 9, 2023, and April 10, 2023.
  - Resiliency scores of Propel proposals, comment letters submitted on March 9, 2023, and April 10, 2023.
  - Risk related to length of HDD across White Stone Bridge, comment letter submitted on April 10, 2023. Though the length of the proposed HDD had been corrected,, the risk assessment report continues to incorrectly note that "this is approaching the limit of the HDD capability". Propel believes this statement is inaccurate for the reasoning provided in the comment letter submitted on April 10, 2023, and should be revised accordingly.
2. Risk Item D-7 (Appendix Risk Assessment Register Draft, P. 5 of Propel Solutions) "Design concern Dunwoodie – Insufficient Space for Line Terminal.": The description of the risk states, "Per the one - line diagram, the project plans to add a 345kV line terminal to Eastern Queens (typo in report, should be "Dunwoodie") between the breakers 6 and 8. However, the plot plan shows the connection to the existing GIS equipment between breakers 3 and 4. There is not sufficient space between breakers 6 and 8 to add the line terminal." From transmission planning perspective, it does not matter since both sections (6-8 and 3-4) are fed from Wood St. through Pleasantville feeders W89 and W90, and the second tap on each of the GIS 345kV bus both feeds into Dunwoodie 138kV. Propel's



design connects to the existing GIS between Breaker 3 and 4, not Breaker 6 and 8, and where there is sufficient space to accommodate the interconnection. This is also in agreement with SIS study result. Therefore, this risk should be removed.

3. Risk Item D-8 (Appendix Risk Assessment Register Draft, P. 5 of Propel Solutions)  
“Design Concern – Dunwoodie Proposed 345kV Line Exit.”: The description of the risk states, “Due to a rock outcropping and a significant drop in elevation along the eastern side of the substation and ROW, it will be difficult to route an underground line out of the proposed GIS towards the east, as proposed.” Propel disagrees with this assessment. Installation of any new feeder in this area will certainly be difficult, however, Propel’s new feeder purposely stays within the same path of the existing Y50 to reduce the risk. Given Propel’s design approach, the NYISO risk registry should be revised by reducing this design component as a high risk to a low risk.
  
4. Risk Item D-9 (Appendix Risk Assessment Register Draft, P. 5 of Propel Solutions)  
“Design Concern – Sprain Brook Proposed 345kV Line Exits.”: The description of the risk states, “Due to a rock outcropping and a significant drop in elevation along the eastern and western side of the substation, it will be difficult to route an underground line, as proposed.” Propel disagrees with this assessment and strongly believes this is not a valid risk. The Propel team looked into several different options entering Sprain Brook and was fully aware of the rock ledge and complex topography in the proximately. The route that Propel proposed avoids the rock situation by entering from north of Sprain Brook as shown below. Furthermore, NYISO previously requested information on why Propel chose routing into Sprain Brook along Ridge Hill Blvd and Otis Dr (RFI 04) and Propel provided detailed reasoning on avoiding the rock ledge situation as well as avoiding traverse the station driveway which can be highly congested. Propel believes the route chosen should be one of the easiest routes entering Sprain Brook, therefore this risk should be removed.



5. Risk Item D-10 (Appendix Risk Assessment Register Draft, P. 5 of Propel Solutions)  
“Design Concern – Tremont”: The description of the risk states, “The proposed GIS equipment, which Propel NY preliminary identified as a potential NUF, is to be installed at the location of the existing bus connections between Banks 1 and 2 and the tie to the 345kV X28 line to Sprain Brook. The construction of the proposed NUF would require an extensive outage of the transformers and the line. Also, the proposed location of the control house will cut off access to the northern side of the substation.” Propel disagrees with this assessment. On January 9<sup>th</sup>, Per NYISO request, Propel provided a detailed explanation on three different options for the construction of the proposed interconnection facilities at Tremont substation. The intend is to have X28 de-energized for short time, cut the bus between feeds into transformers 11 and 12, and then energize back to have one transformer in service. M29 project specifically addressed the loss of X28, so there should be no reliability concerns from system perspective. There is enough space to maintain NESC required clearances. The new feeder will connect to the new GIS feeding the other transformer taking X28 out to install the other half of the new GIS. Related to the “cut off access” statement, all areas outside the fence belong to ConEd, so access should not be an issue and an access plan can be developed during detailed design phase. Propel requests NYISO to re-evaluate the associated risk.
  
6. Risk Item D-11 (Appendix Risk Assessment Register Draft, P. 5 of Propel Solutions):  
“Design Concern – Barrett 138kV”: The description of the risk states, “There is insufficient space to replace the existing breaker 1330 with a double PASS breaker due to a large lattice deadend structure that would interfere with this...”. The new PASS assembly can



be moved closer to the existing AIS bus to have enough clearance to energized parts per IDDD 1427 recommended value. Therefore, the probability of this risk should be lowered.

7. Risk Item D-12 (Appendix Risk Assessment Register Draft, P.5 of Propel Solutions) “Design Concern- East Garden City Proposed 345kV Reactor”: The description of the risk states, “The location for the proposed 345kV reactor will interfere with a main cable trench and access road. In addition, the Plot Plan provided incorrectly shows the location of the existing Y49 line exit. Therefore, the proposed 345kV reactor will extend further to the west than shown. It may not fit within the fenced area of the substation. Also, the reactor would be installed under the double ckt overhead Lines 361 and 362, a distribution, and communication circuits.” Propel asserts that both the cost impact and scheduled impact risks noted in Item D-12 should be reduced from high and medium, respectively, to low and low given the following engineering design optimization that can be incorporated with minimal cost impacts to avoid line outages and additional property requirements:

- i. Shifting the proposed access road between the left-hand and middle bay to middle and right-hand bay to prevent overhead line outage and/or relocation, allowing easy access to the right-hand bay.
- ii. Eliminate the clearance concerns and avoid lines 361 and 362 outages by rotating the top bus breaker/pothead structure 90 degrees to the north and in line with the right-hand bay, and the bottom bus breaker/pothead structure 90 degrees south and relocating it in line with the middle bay.
- iii. The comment referencing “the proposed 345kv reactor” is referring to the line breakers/pothead structures connecting to the existing 345/138 autos. Relocating them as suggested in item (ii) above eliminates the need to acquire and use additional property beyond the fence line.

## 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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NYPA

A handwritten signature in black ink, appearing to read "Paul Haering", written over a horizontal line.

Paul Haering  
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