

Dear NYISO,

The PPTN process is an important part of the New York plans to meet its climate goals. We support the process and methods the NYISO has taken to complete their analysis and recommendations. The metrics that NYISO used is a fair balance of the Developers and Customers interest. As an active OSW developer, we believe there is an urgency to completing transmission upgrades as soon as possible. The top two project recommendations, T051 and T049 provide good benefits with lower risks than the other top tier choices. We believe that T051 provides more longer term benefits because of the additional 345 kV line out of zone K, which will be needed if we exceed the 3,000 MW OSW targets in zone K. Project T049 provides greater short term benefits because it includes more internal zone K transmission lines, reducing congestion and curtailment risks. Project T049 also has a lower total cost than T051 and possibly a shorter construction time. We look forward to the completion of this selection process and our role in helping New York meet its low carbon goals.