NEW YORK STATE | Department of Public Service

Three Empire State Plaza, Albany, NY 12223-1350
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February 14, 2024

Hon. Michelle Phillips
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case 22-E-0633 – In the Matter of New York Independent System Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022.

Dear Secretary Phillips:

The attached document addresses questions that Department of Public Service Staff has recently received.

Sincerely,

Leka P. Gjonaj

Leka P. Gjonaj, PE
Chief, Electric Safety and Reliability

QUESTIONS/ANSWERS FOR NYC PUBLIC POLICY TRANSMISSION NEED

Question 1: Appendix A, Specification 1) of the June 22, 2023, NYC PPTN Order, states that proposed projects must: Accommodate the full output of at least 4,770 MW of incremental offshore wind generation injected into New York City (Zone J), under applicable reliability standards, without reducing the overall output of other renewable resources interconnected in Zones J and K.
Clarification is being sought regarding how to interpret the last phrase in Specification 1) "without reducing the overall output of other renewable resources interconnected in Zones J and K" **for Zone J when executing the various system simulation models (e.g., powerflow).**

Answer 1: The Order requires that a proposed solution demonstrate the ability to deliver the full output of at least 4,770 MW of incremental offshore wind to New York City interconnection points. The "overall output" of the other renewable resources (e.g., Champlain Hudson Power Express and Empire Wind 1) in Zone J should be interpreted as the maximum output/dispatch level from each of these resources that does not create reliability criteria violations under the various stages of the assessment (i.e., N-0, N-1, N-1-0, and N-1-1) in NYISO's Viability & Sufficiency baseline case.

In NYISO's Viability & Sufficiency Assessment, proposed projects must maintain the baseline case output levels of the other renewable resources in Zone J and Zone K while also maintaining the incremental 4,770 MW at full output.

Question 2: When accommodating the full output of at least 4,770 MW of incremental offshore wind generation injected into New York City/Zone J, clarification is being sought regarding the treatment of the bulk export constraints on the interface from Zone J to the rest of the New York Control Area during peak load conditions for NYISO's Viability & Sufficiency Assessment

Answer #2: The applicable bulk export constraints on the interface from Zone J to the rest of the New York Control Area (NYCA) must be adhered to/respected. Generation in Zone J and/or rest of NYCA can be dispatched down to accommodate offshore wind injected in Zone J (i.e., incremental 4,770 MW) to prevent exceeding a bulk export circuit/feeder's normal rating under N-0 and N-1-0 contingency evaluations or a circuit/feeder's applicable post-contingency rating under N-1 and N-1-1 contingency evaluations.

For purposes of NYISO's Viability & Sufficiency Assessment, under peak load conditions, when securing the system to respect bulk export constraints reduction of the incremental 4,770 MW offshore wind is NOT permissible.

Question 3: Appendix A, Evaluation Criteria 4) of the June 22, 2023, NYC PPTN Order, states the following: Solutions are not required to relieve bulk export constraints on the interface from Zone J to the rest of the New York Control Area during light load conditions.
Questions have arisen as to whether or not the bulk export constraints/limits from Zone J to the New York Control Area need to be adhered/respected during these conditions.

Answer 3: The applicable bulk export constraints on the interface from Zone J to the rest of the New York Control Area (NYCA) must be adhered to/respected. Generation in Zone J and/or rest of NYCA can be dispatched down to accommodate offshore wind injected in Zone J (i.e., incremental 4,770 MW or higher[1]) to prevent exceeding a bulk export circuit/feeder's normal rating under N-0 and N-1-0 conditions or a circuit/feeder's applicable post-contingency rating under N-1 and N-1-1 contingency evaluations.

Under light load conditions, when securing the system to respect bulk export constraints, reduction of the incremental 4,770 MW offshore wind is permissible.

[1] Developers may propose offshore injections above 4,770 MW.