

**NEW YORK CITY OFFSHORE WIND PUBLIC POLICY TRANSMISSION NEED
PROJECT SOLICITATION**

Response due June 3, 2024 11:59 PM EDT

April 4, 2024

Dear NYISO Stakeholder or Interested Party:

With this letter, the NYISO solicits Public Policy Transmission Projects¹ and Other Public Policy Projects² to address the New York City Offshore Wind Public Policy Transmission Need (“NYC PPTN”) for consideration in the NYISO’s Public Policy Transmission Planning Process.

I. New York City Offshore Wind Public Policy Transmission Need

On August 31, 2022, the NYISO issued a letter inviting stakeholders and interested parties to submit proposed transmission needs driven by Public Policy Requirements to the NYISO on or before October 31, 2022.³ On November 7, 2022, the NYISO filed with the New York State Public Service Commission (“PSC”) proposals for transmission needs driven by Public Policy Requirements submitted by 17 entities.⁴ On November 8, 2022, the NYISO also submitted to the Long Island Power Authority nine proposals for transmission needs that, as proposed, would require a physical modification to transmission facilities in the Long Island Transmission District. On December 21, 2022, the PSC published the proposed needs in the State Register for comments in accordance with the New York State Administrative Procedure Act.⁵

Following the public comment period, the PSC issued an order on June 22, 2023 stating:

The [PSC] finds that the [the Climate Leadership and Community Protection Act (CLCPA)] constitutes a Public Policy Requirement driving the need for transmission to support the injection of offshore wind generation into New York City (NYISO Zone J). Solicitations to that need shall:

¹ Capitalized terms in this letter refer to defined terms in the NYISO’s Open Access Transmission Tariff (“OATT”) or the NYISO Public Policy Transmission Planning Process Manual (“PPTPP Manual”).

² An Other Public Policy Project is defined as a “non-transmission project or a portfolio of transmission and non-transmission projects proposed by a Developer to satisfy an identified Public Policy Transmission Need.”

³ The requirements for the Public Policy Transmission Planning Process are set forth in Attachment Y of the OATT and the NYISO PPTPP Manual.

⁴ The NYISO posted these submittals on its Planning Studies website under “Proposed Needs” contained within the “Public Policy Documents” folder on the NYISO’s Planning Studies website, which can be accessed at: <https://www.nyiso.com/cspp>.

⁵ Notice of Proposed Rulemaking, *Proposed Public Policy Transmission Needs/Public Policy Requirements, As Defined Under the NYISO Tariff*, New York State Register (December 21, 2022), available at <https://dos.ny.gov/system/files/documents/2022/12/122122.pdf>.

- 1) 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.
- 2) Consist of complete end-to-end proposals comprised of both offshore and onshore components to enable power injection into Zone J. The components should include:
 - One or more offshore interconnection point(s);
 - Offshore transmission (i.e., submarine cables);
 - Sites for cable landing points;
 - Onshore transmission path(s) (i.e., terrestrial cables) from cable landing points to points of interconnection (POIs) in Zone J, including sites for converter stations, if necessary; and
 - Necessary improvements to and/or expansion of the existing onshore transmission system.
- 3) Include plans for how offshore wind generation would interconnect to the end-to-end transmission proposal at the offshore interconnection points. Examples may include, but are not limited to, individual standalone DC connectors, each for a single offshore wind project; or an offshore substation for HVDC cable(s) and offshore wind project export line(s).
- 4) Demonstrate plans to complete all permitting and construction activities necessary to achieve an in-service date no later than January 1, 2033.⁶

In the Order, the PSC referred the NYC PPTN to the NYISO to consider solutions to support the injection of offshore wind generation into New York City. The Order prescribed the following criteria for the NYISO to consider in its evaluation in accordance with its OATT:

- 1) Scenarios representing up to 8,000 MW of incremental offshore wind generation injected into New York City should be used to evaluate the performance of proposed solutions.
- 2) Minimize, to the extent possible, the use of AC submarine cables in constrained areas.

⁶ Case No. 22-E-0633, *Matter of New York Indep. Sys. Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, Order Addressing Public Policy Requirements for Transmission Planning Purposes (June 22, 2023), at 47 (“the Order”), available at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={A077E488-0000-C217-BAED-C4B0826480C5}>.

- 3) Demonstrate that [proposed solutions] do not preclude or foreclose on the ability to expand and/or integrate into a future offshore transmission network.
- 4) No requirement to relieve bulk export constraints on the interface from Zone J to the rest of the New York Control Area during light load conditions.
- 5) Optimize the use of intended corridors to achieve the intended level of offshore wind integration and account for the findings of NYSERDA's Cable Corridor Assessment.
- 6) Take into consideration potential interference and/or synergy with the Long Island Offshore Wind Export PPTN.⁷

In addition to technical requirements and evaluation criteria, the Order proposes supplemental criteria outlined in its Appendix B for consideration during the NYISO's evaluation and ranking of proposed transmission projects, which includes twelve design principles for Developers to optimize routing of multiple offshore wind cables in the marine environment and at landfalls and over land. The Order also stressed the importance of Developers having the necessary real property rights for the development of their proposed solutions so that they are "in a position to move forward promptly in order to meet the 2033 in-service date."⁸ In doing so, the Order prescribed an evaluation criterion to consider the extent that each Developer has the necessary real property rights to implement its proposed Public Policy Transmission Project.⁹

Following the PSC's issuance of the Order, DPS staff filed three documents, on September 7, 2023,¹⁰ January 17, 2024,¹¹ and February 14, 2024,¹² that addressed questions on the requirements contained in the Order. Additionally, DPS staff, in a letter to the NYISO, further provided direction in preparing the Viability and Sufficiency Assessment (VSA) baseline

⁷ *Id.* at 48–49

⁸ *Id.* at 43.

⁹ *Id.*

¹⁰ Case No. 22-E-0633, *Matter of New York Indep. Sys. Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, Letter with Question/Answer for NYC Public Policy Transmission Need (September 7, 2023), available at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={D0D6748A-0000-C412-9633-A73311B58EDF}>.

¹¹ Case No. 22-E-0633, *Matter of New York Indep. Sys. Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, Letter with Question & Answer (January 17, 2024), available at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={5095188D-0000-C01B-9C28-4F73EBCD2D21}>.

¹² Case No. 22-E-0633, *Matter of New York Indep. Sys. Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, PPTN Questions and Answers (February 14, 2024), available at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={70FAA88D-0000-C810-9C28-D8E1A22A61CB}>.

case in response to updates from the cancellation of Offshore Renewable Energy Certificate (OREC) agreements with two offshore wind generation projects.¹³

II. Stakeholder Discussions and Technical Conferences

The NYISO made presentations at combined meetings of the Electric System Planning Working Group (ESPWG) and the Transmission Planning Advisory Subcommittee (TPAS)¹⁴ to review the Order, the PSC’s determination of the Public Policy Requirement, and the nature of the resulting NYC PPTN.¹⁵ The NYISO held technical conferences on November 6, 2023 and December 7, 2023 with Developers and interested parties to provide information and obtain input on the NYISO’s application of the selection metrics set forth in Section 31.4.8.1 of the OATT for purposes of soliciting solutions to the Public Policy Transmission Need.¹⁶

On September 7, 2023, as noted above, the DPS staff filed with the PSC a “Letter with Question/Answer for NYC Public Policy Transmission Need” document, which was jointly prepared with the NYISO, that responded to stakeholders’ questions on requirements contained in the Order.¹⁷ The NYISO also has prepared documents¹⁸ containing answers to frequently asked questions received from Developers and stakeholders. Additionally, the NYISO has developed a “Developer Technical Guidance Document” to provide additional technical guidance in the preparation of proposed solutions.

Furthermore, the NYISO has established sufficiency criteria in accordance with the criteria set forth in the Order and has developed a VSA baseline powerflow model and associated power flow results to aid interested Developers in developing proposed solutions. The attached “Sufficiency Criteria, Evaluation Criteria, Project Submittal Requirements, and Additional Information” document details the criteria that the NYISO will apply in assessing the sufficiency of each proposed Public Policy Transmission Project and Other Public Policy Project to satisfy the NYC PPTN.

Future updates and discussions regarding the NYC PPTN will be held at ESPWG and TPAS throughout the assessment and evaluation process.

¹³ Case No. 22-E-0633, *Matter of New York Indep. Sys. Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, DPS Staff Letter to NYISO (February 14, 2024), available at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={90F7A88D-0000-CF19-829E-3550AB1E4094}>.

¹⁴ Meetings were held on July 25, 2023, August 22, 2023, September 21, 2023, October 2, 2023, October 24, 2023, November 21, 2023, December 19, 2023, January 23, 2024, February 6, 2024, February 22, 2024, March 8, 2024, and March 21, 2024.

¹⁵ The NYISO’s presentations are posted on its website under meeting materials at the following links: <https://www.nyiso.com/espwg> and <https://www.nyiso.com/tpas>.

¹⁶ OATT § 31.4.4.3.1; Public Policy Transmission Planning Process Manual (“PPTPP Manual”) § 3.2.

¹⁷ See footnote 10, *supra*.

¹⁸ NYISO-prepared documents for the NYC PPTN are located and available at the following link under “NYC Offshore Wind PPTN” contained within the “Public Policy Documents” folder on the NYISO’s Planning Studies website, which can be accessed at <https://www.nyiso.com/cspp>.

III. Project Submission Requirements

General Requirements

Pursuant to Section 31.4.3 of the OATT, the NYISO hereby solicits Public Policy Transmission Projects and Other Public Policy Projects to address the NYC PPTN. Developers, including Transmission Owners and Other Developers, must provide project information in accordance with Section 31.4.5 of the OATT and Sections 3.3, 3.4.2, 3.4.3 of the PPTPP Manual, as well as Attachments B and C of the PPTPP Manual.¹⁹ Specifically, a Developer proposing a Public Policy Transmission Project or an Other Public Policy Project must submit the project information required in Attachment B of the PPTPP Manual, including the [additional information requested by the NYISO](#) specific to the NYC PPTN.²⁰ A Developer proposing a Public Policy Transmission Project must, in addition to submitting Attachment B, submit the project information required in Attachment C of the PPTPP Manual for the NYISO's project evaluation and selection,²¹ as well as the additional information required by the Order as set forth in the attached "Sufficiency Criteria, Evaluation Criteria, Project Submittal Requirements, and Additional Information" document. If a Developer submits Confidential Information as part of its project information, the Developer shall submit redacted and unredacted versions of the project information pursuant to Section 31.4.15.4 of the OATT.²² Project information required in Attachment C of the PPTPP Manual must not contain Confidential Information.

Developers should compile and submit project proposals in an organized and complete manner. The NYISO will consider the quality of project proposals during the evaluation of projects with an emphasis on consistency, clarity, and completeness.

Please note that once a Developer submits a Public Policy Transmission Project to the NYISO for consideration, the design of the proposed facilities (*i.e.*, new transmission facilities or Public Policy Transmission Upgrades proposed to satisfy the Public Policy Transmission Need) cannot be modified.

A Developer must submit its proposed solution to the NYISO in the manner described below by 11:59 pm EDT on June 3, 2024 in order to be considered in the NYISO's Public Policy Transmission Planning Process for the NYC PPTN.

¹⁹ NYISO Public Policy Transmission Planning Process Manual, available at https://www.nyiso.com/documents/20142/2924447/M-36_Public%20Policy%20Manual_v1_0_Final.pdf.

²⁰ Attachment B to the PPTPP Manual, entitled "Information for a Proposed Solution to a Public Policy Transmission Need," is posted at: <https://www.nyiso.com/manuals-tech-bulletins-user-guides>. Please note that Attachment B was updated on April 2, 2024.

²¹ Attachment C to the PPTPP Manual entitled "Data Submission for Public Policy Projects" is posted at: <https://www.nyiso.com/manuals-tech-bulletins-user-guides>. Please note that Attachment C was updated on April 2, 2024.

²² See *id.* at § 31.4.4.3.3.

Specific only to a Public Policy Transmission Project, a Developer must also include with its submission (also by 11:59 pm EDT on June 3, 2024):

- (1) an executed Study Agreement for Evaluation of Public Policy Transmission Projects, which is contained in Appendix I of Section 31.12 of the OATT and provided as a fillable form as Attachment II to this letter,²³
- (2) a non-refundable application fee of \$10,000, and
- (3) a study deposit of \$100,000.²⁴

Please contact NYISO Accounts Receivable (NYISOFinancePlanningStudies@nyiso.com) regarding submission of the application fee and study deposit.

Developers must send their proposed solutions electronically to publicpolicyplanningmailbox@nyiso.com, including in the subject line, “NYC PPTN Project Proposal.” Due to file size restrictions, email attachments should not exceed 60 MB for any single email. Project proposal attachments exceeding the email size limit must be uploaded to a location designated by the NYISO, and the Developer must include the list of files uploaded to the location in the email. The link to access the location for the uploading of files can be requested in advance by sending an email to stakeholder_services@nyiso.com by May 29, 2024 with the subject line “NYC PPTN Project Proposal” and the body of the email indicating the name of Developer and a list of individuals’ names and email addresses who will upload the files.

Interconnection Requirements

The Developer of a Public Policy Transmission Project must also demonstrate to the NYISO, simultaneous with its submission of its proposed project, that it has also submitted a Transmission Interconnection Application that contains the same project information submitted for its Public Policy Transmission Project. For the avoidance of any doubt, the “same” project information means that the transmission facilities that are identified as part of the project and necessary to address the NYC PPTN in its submittal in the Public Policy Transmission Planning Process must be identical to the transmission facilities in the Transmission Interconnection Application with identical electrical characteristics, modeling information, and contingency information. If a Developer includes a transmission facility with its proposed Public Policy Transmission Project that is identified by the Developer as potential Network Upgrade Facilities (“NUF”) required for the reliable interconnection of the project, the Developer must not include that facility in the Transmission Interconnection Application as part of the “Transmission Project,” as defined under Attachment P to the OATT. Facilities that the Developer identifies as potential NUFs required to reliably interconnect the project are subject to change, as the NUFs for the project will be ultimately identified by the NYISO through the Transmission Interconnection Procedures.

²³ OATT § 31.4.4.4; PPTPP Manual § 3.4.2.

²⁴ OATT § 31.4.4.4.

Please note that references to the interconnection process in this letter are focused on the Transmission Interconnection Procedures.²⁵ Additional information on the coordination of the Public Policy Transmission Planning Process and the NYISO's interconnection processes is contained in Section 3.4.4 and Attachment C of the PPTPP Manual.

Voluntary Cost Caps

For a Public Policy Transmission Project, a Developer may voluntarily submit with its project information a Cost Cap for its proposed project that covers its Included Capital Costs, as defined in Section 31.4.5.1.8.1 of the OATT, but not its Excluded Capital Costs, as defined in Section 31.4.5.1.8.2.²⁶ Such Cost Cap for a proposed Public Policy Transmission Project may be in the form of a hard Cost Cap or a soft Cost Cap as described in Sections 31.4.5.1.8.3 and 31.4.5.1.8.4 of the OATT. The NYISO's consideration of any Cost Cap submitted by a Developer will be based on the quantitative and qualitative considerations in Sections 31.4.8.1 and 31.4.8.2 of the OATT. The NYISO's consideration of Excluded Capital Costs and/or costs of a proposal that does not contain a voluntary Cost Cap in its evaluation and selection will rely on the cost estimates determined by its independent consultant.

Alternative Proposals

A Developer must submit a separate application for each distinct Public Policy Transmission Project. The only permitted alternatives within a proposed Public Policy Transmission Project are routing alternatives as provided in Section 31.4.5.1.3 of the OATT. Any other alternative must be submitted as a separate Public Policy Transmission Project.²⁷

IV. Developer Qualification for Proposed Transmission Projects

A Developer proposing a Public Policy Transmission Project must be qualified under the provisions of Attachment Y. **A Developer that is not yet qualified to submit transmission projects but intends to respond to this solicitation, must submit a Developer Qualification Form on or before May 4, 2024.**²⁸ Please note that this date is before submissions for proposed Public Policy Transmission Projects are due to the NYISO. Developers intending to participate are strongly encouraged to submit qualification applications as soon as they are ready but no later than this date. Additional information can be found on the NYISO's website.²⁹

²⁵ *Id.* at § 31.4.4.3.4. In most cases for the NYC PPTN, Developers of a Public Policy Transmission Project will need to submit a Transmission Interconnection Application for their proposals. For Developers considering an interconnection process other than the Transmission Interconnection Procedures for its Public Policy Transmission Project, they should refer to the NYISO's initiative to comply with Order No. 2023 and fully understand the Cluster Study Process and the transition from the Large Facility Interconnection Procedures under Attachments S and X to the Standard Interconnection Procedures under Attachment HH that will be requested to be effective on April 4, 2024. *See generally*, Interconnection Order No. 2023 Compliance Plan and Tariff Review Presentation (March 1, 2024), available at https://www.nyiso.com/documents/20142/43295731/02%20Order%20No.%202023%20Compliance%20Plan%20and%20Tariff%20Revisions_IITF_20240301.pdf/.

²⁶ *See* OATT § 31.4.5.1.8.

²⁷ *Id.* at § 31.4.4.3.2.

²⁸ *Id.* at § 31.4.4.3.7; *see also id.* at §§ 31.4.4.1, 31.4.4.3.

²⁹ The primer on the Developer qualification process may be obtained at the following link: <https://www.nyiso.com/documents/20142/1395552/Developer-Qualification-Process.pdf/>.

Additionally, the Developer Qualification Form can be found in Attachment A of the NYISO’s Reliability Planning Process Manual, as well as accessed through Attachment A of the PPTPP Manual.³⁰ A Developer that has been qualified has the continuing obligation to (a) inform the NYISO within 30 days of any material change not previously reported to the information that it provided in support of its qualifications and (b) submit to the NYISO each year its most recent audited annual financial statement when available.³¹ Additional details on the application of the qualification requirements to Developers of proposed transmission projects are contained in Attachment G of the Reliability Planning Process Manual.³² All submissions of Developer Qualification Forms and updates must be submitted to DeveloperQualification@nyiso.com.

V. Project Evaluation and Selection

The NYISO staff will evaluate the proposed Public Policy Transmission Projects using metrics as described in the NYISO’s tariff, as well as the criteria prescribed by the PSC, to identify the more efficient or cost-effective solution to satisfy the NYC PPTN. The process for the evaluation of proposed Public Policy Transmission Projects is detailed in Section 31.4.8 of the OATT and described in the PPTPP Manual. The attached “Sufficiency Criteria, Evaluation Criteria, Project Submittal Requirements, and Additional Information” document lists the criteria that the NYISO will consider to identify the more efficient or cost-effective solution. The evaluation may also include scenarios to evaluate the proposed Public Policy Transmission Projects impact on the NYISO’s wholesale electricity markets and how each proposal could facilitate achievement of the Public Policy Requirement—*i.e.*, the CLCPA.

Questions about the submittal of project information or about the Public Policy Transmission Planning Process should be addressed to stakeholder_services@nyiso.com with the subject line “NYC PPTN.”

Very truly yours,

/s/ Zachary G. Smith

Zachary G. Smith
Senior Vice President
System & Resource Planning

Attachment I
Attachment II

cc: Robert Rosenthal, General Counsel, State of New York Department of Public Service

³⁰ The Developer qualification form may be obtained at the following link:
https://www.nyiso.com/documents/20142/2924881/M-26_RPP%20Manual_Att%20A_Final.pdf/.

³¹ See OATT § 31.4.4.1.2.

³² Attachment G of the Reliability Planning Process Manual is available at the following link:
https://www.nyiso.com/documents/20142/2924881/M-26_RPP%20Manual_Att%20G_v2016-04-01_Final.pdf/.

Attachment I

Sufficiency Criteria, Evaluation Criteria, Project
Submittal Requirements, and Additional Information

New York City Offshore Wind Public Policy Transmission Need

Sufficiency Criteria, Evaluation Criteria,
Project Submittal Requirements, and Additional Information

Sufficiency Criteria (Minimum Criteria)

In order to address the New York City Offshore Wind Public Policy Transmission Need (“NYC PPTN”) as identified by the New York State Public Commission (“PSC”), a proposed Public Policy Transmission Project or Other Public Policy Project shall meet the following minimum sufficiency criteria:

- 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;
- Consist of complete end-to-end proposals comprised of both offshore and onshore components to enable power injection into Zone J. The components should include:
 - One or more offshore interconnection point(s),
 - Offshore transmission (i.e., submarine cables),
 - Sites for cable landing points
 - Onshore transmission path(s) (i.e., terrestrial cables) from cable landing points to points of interconnection (POIs) in Zone J, including sites for converter stations, if necessary, and
 - Necessary improvements to and/or expansion of the existing onshore transmission system;
- Include plans for how offshore wind generation would interconnect to the end-to-end transmission proposal at the offshore interconnection points. Examples may include, but are not limited to, individual standalone DC connectors, each for a single offshore wind project; or an offshore substation for HVDC cable(s) and offshore wind project export line(s); and
- Demonstrate plans to complete all permitting and construction activities necessary to achieve an in-service date no later than January 1, 2033.

In reviewing the minimum sufficiency criteria, Developers should be mindful of three documents that DPS filed in the PSC docket to address questions on the requirements contained in the Order on September 7, 2023, January 17, 2024, and on February 14, 2024.

Additionally, the DPS, in a letter to the NYISO dated February 14, 2024, provided further direction to the NYISO in preparing the Viability and Sufficiency Assessment (VSA) baseline case.

Developers shall refer to the Developer Technical Guidance Document made available by the NYISO to CEII approved requestors when designing proposed solutions to address the NYC PPTN.

Evaluation and Selection Criteria for a Public Policy Transmission Project

For the purposes of the evaluation and selection of the more efficient or cost-effective Public Policy Transmission Project to address the NYC PPTN, the following criteria will be applied:

- In accordance with Section 31.4.8.1 of its OATT, the NYISO will consider the following criteria and metrics: capital cost estimate, voluntary Cost Cap, cost per MW ratio, expandability, operability, performance, property rights and routing, potential construction delays, and any criteria specified by the Climate Leadership and Community Protection Act (CLCPA).
- The following additional evaluation criteria were provided by the PSC in the Order:
 - Scenarios representing up to 8,000 MW of incremental offshore wind generation injected into New York City will be evaluated in the performance of the proposed solutions with respect to expandability, renewable energy delivery,
 - Minimize, to the extent possible, the use of AC submarine cables in constrained areas,
 - Demonstrate that they do not preclude or foreclose on the ability to expand and/or integrate into a future offshore transmission network,
 - No requirement to relieve bulk export constraints on the interface from Zone J to the rest of the New York Control Area during light load conditions,
 - Optimize the use of intended corridors to achieve the intended level of offshore wind integration and account for the findings of NYSERDA's Cable Corridor Assessment,
 - Consider potential interference and/or synergy with the Long Island Offshore Wind Export PPTN, and
 - Extent to which the Developer has the real property rights to implement its proposed Public Policy Transmission Project; and

- Compliance with the twelve design principles contained in Appendix B to the Order to optimize routing of multiple offshore wind cables (a) in the marine environment and (b) at landfalls and over land.
- Additional considerations/assumptions that were presented and discussed with stakeholders and interested parties in evaluating and selecting the more efficient or cost-effective solution:
 - Transmission constraints excluded from the sufficiency assessment (e.g., criteria exceedances identified in the VSA baseline case) may be considered in the evaluation of project proposals to identify the more efficient or cost-effective solution;
 - Scenarios with the following conditions may be considered in the evaluation of project proposals to identify the more efficient or cost-effective solution, such as:
 - Transmission constraints resulting from dispatch of other renewable resources up to their full output in Zones J and K,
 - Inclusion of offshore wind generators that receive NYSERDA awards for Offshore Renewable Energy Certificates that are not already included in the VSA baseline case, and/or
 - Flow of 311 MW on Linden VFT into Zone J;
- Criteria that will be excluded from the sufficiency assessment will be valued in the operability metric and considered in other evaluation metrics to identify the more efficient or cost-effective solution, such as:
 - Ability of a proposed transmission project to enable phase angle regulators (“PARs”) to maintain a pre-contingency loading to 75% of its applicable pre-contingency rating (Normal rating) within Zone J, on a Zone J tie line (except for A-line PAR and 300 MW flow scheduled flow over lines 901 and 903 into Zone J), or for any PAR proposed as part of a proposed solution to the NYC PPTN,
 - Ability to inject offshore wind generation with post-contingency loading of the underground cables limited to LTE rating without use of the NYSRC reliability rule allowing for loading to STE rating post-contingency,
 - Ability to inject offshore wind generation without reliance on energy storage to mitigate violations,
 - Ability to inject offshore wind generation with gas turbine units that are still in service at full dispatch, and

- The quality of project proposals based on its consistency, clarity, completeness, and organization; and
- Developers should consider the guidelines outlined in the Developer Technical Guidance Document made available by the NYISO to CEII approved requestors when designing proposed solutions.

Project Submission Requirements

- Developers should ensure the following while submitting project proposals:
 - Consistency in data and description across different documents,
 - Quality of documents conveying requested information,
 - Sharing of information in the requested format, and
 - Clarity of instructions to interpret data (e.g., calculation sheets, manufacturer's sheets, etc.).
- Developers must submit project models and data in the format requested by the NYISO in Attachments B and C of the PPTPP Manual, as well as the [additional information requested by NYISO](#) specific to NYC PPTN under Question 13 of Attachment B of the PPTPP Manual.
- When submitting Confidential Information, as defined in Section 31.4.15 of the OATT, the Developer must submit redacted and un-redacted versions of this project information pursuant to Section 31.4.15.4 of the OATT. Developers proposing a Public Policy Transmission Project shall not submit any Confidential Information in Attachment C of the PPTPP Manual.
- Proposed Public Policy Transmission Projects must include the following in Attachment C.8 of the PPTPP Manual:
 - Clear and succinct demonstration of how the proposed solution meets the viability and sufficiency criteria,
 - Clear and succinct highlights of the specific characteristics and benefits of the proposed solution under the evaluation criteria, as prescribed by the OATT, the PSC Order, and this document,
 - Documentation demonstrating compliance with each of the siting principles outlined in Appendix B of the Order, including an explanation of why and how any necessary deviation, if any, from a siting principle will affect the cost, the schedule, or the permitting risks for the proposed solution,
 - Demonstration of how the solution integrates offshore wind generation by 2035, including any in-service date phasing, above the minimum requirement

of incremental 4,770 MW, if any, up to 8,000 MW, to meet the CLCPA target to integrate 9,000 MW of offshore wind by 2035, and

- Clear and succinct demonstration of any additional benefits and special characteristics of the proposed solution not already addressed under the above.
- Developers must identify which components of their Public Policy Transmission Projects that are necessary to satisfy the NYC PPTN are new facilities or Public Policy Transmission Upgrades¹ as more fully described in Attachments B and C of the PPTPP Manual. Developers, at their option, may identify potential interconnection facilities (also referred to as “preliminary interconnection facilities”), such as Network Upgrade Facilities, that in the Developers’ estimation will be identified through the interconnection studies.² Such potential Network Upgrade Facilities should be separately listed and not commingled with the components of the project (e.g., new facilities or Public Policy Transmission Upgrades) that are necessary to satisfy the NYC PPTN. In accordance with the OATT, the NYISO will review the classification of Project components and, if necessary, ask the Developer for additional information, as necessary. Facilities that the Developer identifies as potential Network Upgrade Facilities required to reliably interconnect the project are subject to change, as the Network Upgrade Facilities for the project will be ultimately identified by the NYISO through the Transmission Interconnection Procedures.

PPTN-Specific Project Information

- For the purpose of determining whether a proposed solution satisfies the NYC PPTN (i.e., sufficiency), the following constraints do not need to be resolved:
 - Facilities operated at a voltage below 100 kV, and
 - Radial facilities that can be excluded for voltage and thermal violations monitoring for the post-contingency conditions as per NPCC and NYSRC performance requirements for the Bulk Power System. NERC Bulk Electric System exclusions may also apply.
- Non-compliance to planning criteria (thermal and voltage) observed in the VSA baseline case shall not increase or worsen after addition of proposed project and associated offshore wind generation under various assessments (N-0, N-1, N-1-0, N-1-1).

¹ OATT §§ 31 (definition of “Public Policy Transmission Upgrade”), 31.6.4.

² OATT § 22.1.

Baseline Study Cases

The VSA baseline case for the NYC PPTN is based on the NYISO 2023 FERC 715 system representation filing with modifications in accordance with NYISO's tariffs and procedures and as required by the Order identifying the NYC PPTN.

The following summarize the major modifications:

- The following offshore wind generation modeled:
 - ~816 MW connected to Zone J (New York City) 816 MW @ Gowanus 345 kV,
 - ~3,000 MW connected to Zone K (Long Island): 139 MW @ East Hampton 69 kV, 880 MW @ Holbrook 138 kV, 1,260 MW @ 138kV lines connecting to Barrett 138 kV, 800 MW @ Ruland Rd 138 kV.

- The following major transmission projects are modeled:
 - T051 Propel NY Alt 5 solution to Long Island Offshore Wind Export PPTN,
 - Champlain-Hudson Power Express (~600 MW injection in VSA baseline case),
 - Clean Path NY (0 MW injection in VSA baseline case),
 - Brooklyn Clean Energy Hub, and
 - Eastern Queens substation.

Please note that the above assumptions are specific to the VSA baseline case.

In addition to the VSA baseline case, the NYISO will utilize a Light Load case with a 2033 system representation, along with updates consistent with NYISO tariffs and procedures, to assess transmission solutions' performance in the evaluation and selection of the more efficient or cost-effective solution. Other scenarios and assumptions including scenarios representing achievement of the CLCPA may also be utilized in the evaluation and selection of the more efficient or cost-effective solution.

The study cases, baseline case study results, and the Developer Technical Guidance Document are available, subject to a Critical Energy Infrastructure Information (CEII) request and approval: <https://nyiso.tfaforms.net/187>

References - Documents

- [PSC Order](#)
- Developer Technical Guidance Document (available upon [CEII request](#))
- [DPS/NYISO PSC Order Q&A Document \(Sep 2023\)](#)
- [DPS PSC Order Q&A Document \(Jan 2024\)](#)
- [DPS PSC Order Q&A Document \(Feb 2024\)](#)
- [DPS NYC PPTN Letter to NYISO \(Feb 2024\)](#)
- [NYISO FAQs](#) (Under Public Policy Documents/NYC Offshore Wind PPTN)
- [NYSERDA Offshore Wind Cable Corridor Constraints Assessment](#)
- [Agency Working Group Technical Conference Presentation](#)
- [Con Edison Technical Conference Presentation](#)
- [Con Edison FAQs](#)
- [Con Edison Updates Dec 7, 2023](#)

References – Meeting Material

- [July 25, 2023](#) [NYC PPTN Update](#)
- [August 22, 2023](#) [NYC PPTN Update](#)
- [September 21, 2023](#) [NYC PPTN Update](#)
- [October 2, 2023](#) [NYC PPTN Update](#)
- [October 24, 2023](#) [NYC PPTN Update](#)
- [November 2, 2023](#) [NYC PPTN Update](#)
- [November 6, 2023](#) [NYISO Technical Conference](#)
- [November 21, 2023](#) [NYC PPTN Update](#)
- [December 7, 2023](#) [NYISO Technical Conference](#)
- [December 19, 2023](#) [PPTPP Manual Updates](#)
- [January 23, 2024](#) [NYC PPTN Update](#)
- [February 6, 2024](#) [NYC PPTN Update](#)
- [February 22, 2024](#) [NYC PPTN Update](#)

- [March 8, 2024](#) [NYC PPTN Update](#)
- [March 21 2024](#) [NYC PPTN Update](#)

Attachment II

Study Agreement for Evaluation of Public Policy Transmission Projects

**STUDY AGREEMENT FOR
EVALUATION OF PUBLIC POLICY TRANSMISSION PROJECTS**

THIS AGREEMENT is made and entered into this ____ day of _____, 2021 by and between _____, a _____ organized and existing under the laws of the State of _____ (“Developer”), and the New York Independent System Operator, Inc., a not-for-profit corporation organized and existing under the laws of the State of New York (“NYISO”). Developer and NYISO each may be referred to as a “Party,” or collectively as the “Parties.”

RECITALS

WHEREAS, Developer is proposing to develop a Public Policy Transmission Project to satisfy one or more identified Public Policy Transmission Needs (“Transmission Project”);

WHEREAS, pursuant to Sections 31.4.3.1, 31.4.4.3, and 31.4.4.4 of Attachment Y to the ISO OATT, the NYISO has requested that all entities interested in proposing a Transmission Project submit specific solutions to the Public Policy Transmission Need, including: (i) submitting their project information and an application fee for purposes of being evaluated in the NYISO’s Public Policy Transmission Planning Process, and (ii) executing this Agreement and submitting a study deposit for purposes of the NYISO’s evaluation and selection of the more efficient or cost-effective transmission solution to the identified Public Policy Transmission Need(s);

WHEREAS, Developer has requested the NYISO to evaluate its Transmission Project for the purpose of selecting the more efficient or cost-effective transmission solution to the identified Public Policy Transmission Need(s);

WHEREAS, pursuant to Sections 31.4.3.1, 31.4.4.3, and 31.4.4.4 of Attachment Y to the ISO OATT, Developer will submit, together with the execution of this Agreement, its project information, application fee, and study deposit for the purpose of the NYISO evaluating its Transmission Project.

NOW, THEREFORE, in consideration of and subject to the mutual covenants contained herein the Parties agree as follows:

- 1.0 When used in this Agreement, with initial capitalization, the terms specified but not otherwise defined herein shall have the meanings indicated in Section 31.1.1 of Attachment Y to the ISO OATT, or if not defined therein, in the ISO OATT.
- 2.0 Developer elects, and the NYISO shall cause to be performed, an evaluation of the Transmission Project in accordance with Sections 31.4.7, 31.4.8, 31.4.9, 31.4.10, and 31.4.11 of Attachment Y to the ISO OATT, along with any required additional evaluation

or re-evaluation of the Transmission Project, for the purpose of the NYISO's selection of the more efficient or cost-effective transmission solution to satisfy the identified Public Policy Transmission Need(s) ("Evaluation"). The terms of Sections 31.4.7, 31.4.8, 31.4.9, 31.4.10, and 31.4.11 of Attachment Y to the ISO OATT, as applicable, are hereby incorporated by reference herein. The NYISO will not commence its Evaluation of the Transmission Project prior to determining that: (i) Developer's Transmission Project is viable and sufficient in accordance with Section 31.4.6 of Attachment Y to the ISO OATT, and (ii) Developer has provided to the NYISO the required notification to proceed with the Evaluation of the Transmission Project in accordance with Section 31.4.6.6 of Attachment Y to the ISO OATT.

- 3.0 Upon the execution of this Agreement, Developer shall provide the NYISO with the project information for its Transmission Project in accordance with Section 31.4.4.3 of Attachment Y to the ISO OATT. Developer shall provide the project information required under Section 31.4.5.1 of Attachment Y to the ISO OATT.
- 4.0 Upon the execution of this Agreement, Developer shall also provide the NYISO with a deposit of \$100,000 in accordance with Section 31.4.4.4 of Attachment Y to the ISO OATT to secure Developer's payment of the NYISO's expenses incurred in performing the Evaluation. The NYISO will not commence its Evaluation of the Transmission Project prior to its receipt of Developer's study deposit. The NYISO shall invoice, and Developer shall pay to the NYISO, the actual costs of the Evaluation in accordance with Section 31.4.4.4 of Attachment Y to the ISO OATT. Upon settlement of the final invoice, the NYISO will return to Developer any remaining portion of the study deposit, including any accrued interest, in accordance with Section 31.4.4.4 of Attachment Y to the ISO OATT.
- 5.0 The NYISO will use the project information provided by Developer as described in Section 3.0 above as an input for its Evaluation; *provided, however*, that pursuant to Section 31.4.8 of Attachment Y to the ISO OATT, the ISO may engage an independent subcontractor consultant to review the reasonableness and comprehensiveness of the project information provided by Developer and may rely on the independent subcontractor consultant's analysis of the project information in performing its Evaluation. The NYISO reserves the right to request additional project information from Developer as may become necessary in accordance with Section 31.4.4.3.5 of Attachment Y to the ISO OATT, and Developer shall submit such additional information within 15 days of the NYISO's request as required under Section 31.4.4.3.8 of Attachment Y to the ISO OATT. Developer shall meet with the NYISO, as the NYISO deems necessary, to discuss Developer's project information.
- 6.0 The scope of the Evaluation shall be subject to the study purposes and criteria set forth in Attachment Y to the ISO OATT and to the assumptions set forth in Attachment A to this Agreement.

7.0 As part of the NYISO's Evaluation of the Transmission Project and prior to identifying the more efficient or cost-effective transmission solution to meet the Public Policy Transmission Need(s), the NYISO will provide Developer with a summary of its findings regarding the project information submitted by Developer and will meet with Developer to discuss its findings and to address any questions regarding the project information. After completing the required analysis of all of the proposed regulated transmission solutions and identifying the more efficient or cost-effective transmission solution, the NYISO will provide all stakeholders with the results of its analysis, including which regulated transmission solution has been identified as the more efficient or cost-effective transmission solution to the Public Policy Transmission Need(s), in the Public Policy Transmission Planning Report pursuant to Section 31.4.11 of Attachment Y to the ISO OATT.

8.0 Miscellaneous.

8.1 Accuracy of Information. Except as Developer may otherwise specify in writing when it provides information to the NYISO under this Agreement, Developer represents and warrants that to the best of its knowledge and belief the information it has provided or subsequently provides to the NYISO is and shall be accurate and complete as of the date the information is provided. Developer shall promptly provide the NYISO with any additional information needed to update information previously provided.

8.2 Disclaimer of Warranty. In performing the Evaluation, the NYISO and any subcontractor consultants engaged by the NYISO will have to rely on information provided by Developer, and possibly by third parties, and may not have control over the accuracy of such information. Accordingly, neither the NYISO nor any subcontractor consultant engaged by the NYISO makes any warranties, express or implied, whether arising by operation of law, course of performance or dealing, custom, usage in the trade or profession, or otherwise, including without limitation implied warranties of merchantability and fitness for a particular purpose, with regard to the accuracy, content, or conclusions of the Evaluation performed pursuant to this Agreement and the ISO OATT. Developer acknowledges that it has not relied on any representations or warranties by the NYISO or its subcontractor consultants not specifically set forth herein and that no such representations or warranties have formed the basis of its bargain hereunder.

8.3 Limitation of Liability. The NYISO or any subcontractor consultants engaged by the NYISO shall not be liable for direct damages, including money damages or other compensation, for actions or omissions by the

NYISO or a subcontractor consultant in performing its obligations under this Agreement, except to the extent such act or omission by the NYISO or a subcontractor consultant is found to result from its gross negligence or willful misconduct. In no event shall either Party or its subcontractor consultants be liable for indirect, special, incidental, punitive, or consequential damages of any kind including loss of profits, arising under or in connection with this Agreement and the ISO OATT or any reliance on the Evaluation by any Party or third parties, even if one or more of the Parties or its subcontractor consultants have been advised of the possibility of such damages. Nor shall either Party or its subcontractor consultants be liable for any delay in delivery or for the non-performance or delay in performance of its obligations under this Agreement.

- 8.4 Third-Party Beneficiaries. Without limitation of Sections 8.2 and 8.3 of this Agreement, Developer further agrees that subcontractor consultants hired by NYISO to conduct or review, or to assist in the conducting or reviewing, the Evaluation of the Transmission Project shall be deemed third party beneficiaries of these Sections 8.2 and 8.3.
- 8.5 Term and Termination. This Agreement shall be effective from the date hereof and, unless earlier terminated in accordance with this Section 8.5, shall continue in effect until completion of the Evaluation, which shall be the later of: (i) the date on which the NYISO Board of Directors' approval of the Public Policy Transmission Planning Process report for the planning cycle is final and not the subject of dispute resolution or a challenge before a court or regulatory body, and (ii) the date on which the New York State Public Service Commission issues the Article VII certification for a regulated transmission solution that satisfies the identified Public Policy Transmission Need(s). Developer or NYISO may end the Evaluation and terminate this Agreement upon: (i) the withdrawal by Developer of its Transmission Project, including its failure to provide the required notification to proceed under Section 31.4.6.6 of Attachment Y to the ISO OATT; (ii) the rejection by the NYISO of the Transmission Project from further consideration during the planning cycle in accordance with the ISO OATT; or (iii) any changes by the New York State Public Service Commission to the identified Public Policy Transmission Need(s), including withdrawal of the Public Policy Transmission Need(s), that eliminate the need for the Transmission Project.

- 8.6 Governing Law. This Agreement shall be governed by and construed in accordance with the laws of the State of New York, without regard to any choice of laws provisions.
- 8.7 Severability. In the event that any part of this Agreement is deemed as a matter of law to be unenforceable or null and void, such unenforceable or void part shall be deemed severable from this Agreement and the Agreement shall continue in full force and effect as if each part was not contained herein.
- 8.8 Counterparts. This Agreement may be executed in counterparts, and each counterpart shall have the same force and effect as the original instrument. A signed copy of this Agreement delivered by facsimile, e-mail or other means of electronic transmission shall be deemed to have the same legal effect as delivery of an original signed copy of this Agreement.
- 8.9 Amendment. No amendment, modification or waiver of any term hereof shall be effective unless set forth in writing signed by the Parties hereto.
- 8.10 Survival. All warranties, limitations of liability and confidentiality provisions provided herein and the payment obligations provided under Section 4.0 shall survive the expiration or termination of this Agreement.
- 8.11 Independent Contractor. NYISO shall at all times be deemed to be an independent contractor for purposes of this Agreement and none of its employees or the employees of its subcontractors shall be considered to be employees of Developer as a result of this Agreement.
- 8.12 No Implied Waivers. The failure of a Party to insist upon or enforce strict performance of any of the provisions of this Agreement shall not be construed as a waiver or relinquishment to any extent of such party's right to insist or rely on any such provision, rights and remedies in that or any other instances; rather, the same shall be and remain in full force and effect.
- 8.13 Successors and Assigns. This Agreement, and each and every term and condition hereof, shall be binding upon and inure to the benefit of the Parties hereto and their respective successors and assigns.
- 8.14 Confidentiality. NYISO shall maintain the project information submitted by Developer under this Agreement in accordance with the requirements

set forth in Sections 31.4.4.3.10, 31.4.4.3.11, and 31.4.15 of Attachment Y to the ISO OATT.

IN WITNESS THEREOF, the Parties have caused this Agreement to be duly executed by their duly authorized officers or agents and to be effective from the day and year first above written.

NYISO

By: _____

Name: _____

Title: _____

Date: _____

(Developer's Name)

By: _____

Name: _____

Title: _____

Date: _____