

Con Edison Comments for the November 16, 2023 Operating Committee on the System Reliability Impact Study Scope Document for

Queue #1493: *Queensboro Renewable Express Circuit A Project*

Con Edison does not object to this generation project and its contribution to the energy transition in New York. To properly study the impacts of the project requires a clear scope. The project's scope document is vague and unclear in two critical areas: the characterization of the project components as either Attachment Facilities (AF) or System Upgrade Facilities (SUF), and the representation of Ravenswood 1 in the study cases. Con Edison believes it is important to resolve these issues before the SRIS proceeds because doing so will provide important information related to the impact of the project on the reliability of the transmission system and will support accountability for operations in the Con Edison transmission district.

Con Edison, the Connecting Transmission Owner (CTO), cannot support the Scope document in its present form due to its vagueness in these two areas:

- **The proposed project components listed in the Scope document are not characterized to sufficiently define the project configuration in the study**

The Scope document states that the Point of Interconnection (POI) will be at the new Ravenswood substation. It also states that the path between this New Substation and Con Edison's Vernon Substation will be an elective SUF. The document is silent on the characterization of the remaining project components: the segment between the Inverter and the New Substation, the New Substation itself, and the segment between the New Substation and Con Edison's Rainey Substation (see diagram below). Each facility proposed by the Developer should be classified into one of two possible categories: either AFs or SUFs. AF is a defined term within the NYISO OATT and, to classify a facility as such, there are conditions that must be satisfied, namely, that it must be a "sole use" facility by the project, and that it cannot include SUFs. Because the new Ravenswood substation will be connected to two Con Edison substations, system power will be flowing through the substation, making this a transmission facility, not a sole use facility by the project, and therefore must be classified as an SUF. The project SUFs are modifications and additions to the existing New York State Transmission System that must comply with Con Edison design criteria and all other Applicable Reliability Standards. Characterizing the project components may result in configuration changes and must be known before studies are undertaken. Failure to do so will result in loss of clarity regarding the accountability for operating system components necessary to provide reliable service to customers in the Con Edison transmission district.

- **Model Representation of Ravenswood 1 in the study databases is not clearly defined in the Scope**

The Developer, NYISO, the Connecting TO, and the public should have a clear understanding of the impact of Ravenswood 1 retirement on the timing of the project's in service date.

This is a reliability issue. The Scope states in footnote 4 that Ravenswood 1 will be retired. There is a direct relationship between the retirement of Ravenswood 1 and the Queensboro project since the project proposes to connect to the same point as Ravenswood 1 at Con Edison's Vernon substation (see diagram below). The timing of Ravenswood 1 retirement and the timing of generation availability from the Queensboro project introduces a system reliability risk that should be identified in this System Reliability Impact Study, separate and distinct from an RMR study that is performed in the STAR process once a generator submits its retirement notice.

The Scope Document describes four cases that will be studied without clearly stating the status of Ravenswood 1 in each case, and Case 1 without the project does not clearly identify if there are pre-existing reliability conditions under the Annual Transmission Baseline Assessment (ATBA) base case. Since Con Edison is responsible for addressing pre-existing violations identified in the ATBA base case, it requires the proposed Case 1 without the project to model two scenarios, Ravenswood 1 in service, and Ravenswood 1 retired.

In summary, the project presents potential reliability risks that need to be studied in its System Reliability Impact Study so that all stakeholders understand the impact of the project on the New York State Transmission System and the Con Edison local system.

