MC Appeal of SRIS Study Scope of Queue #1493: Queensboro Renewable Express Circuit A Project

Consolidated Edison Company of New York, Inc.

Management Committee

December 20, 2023

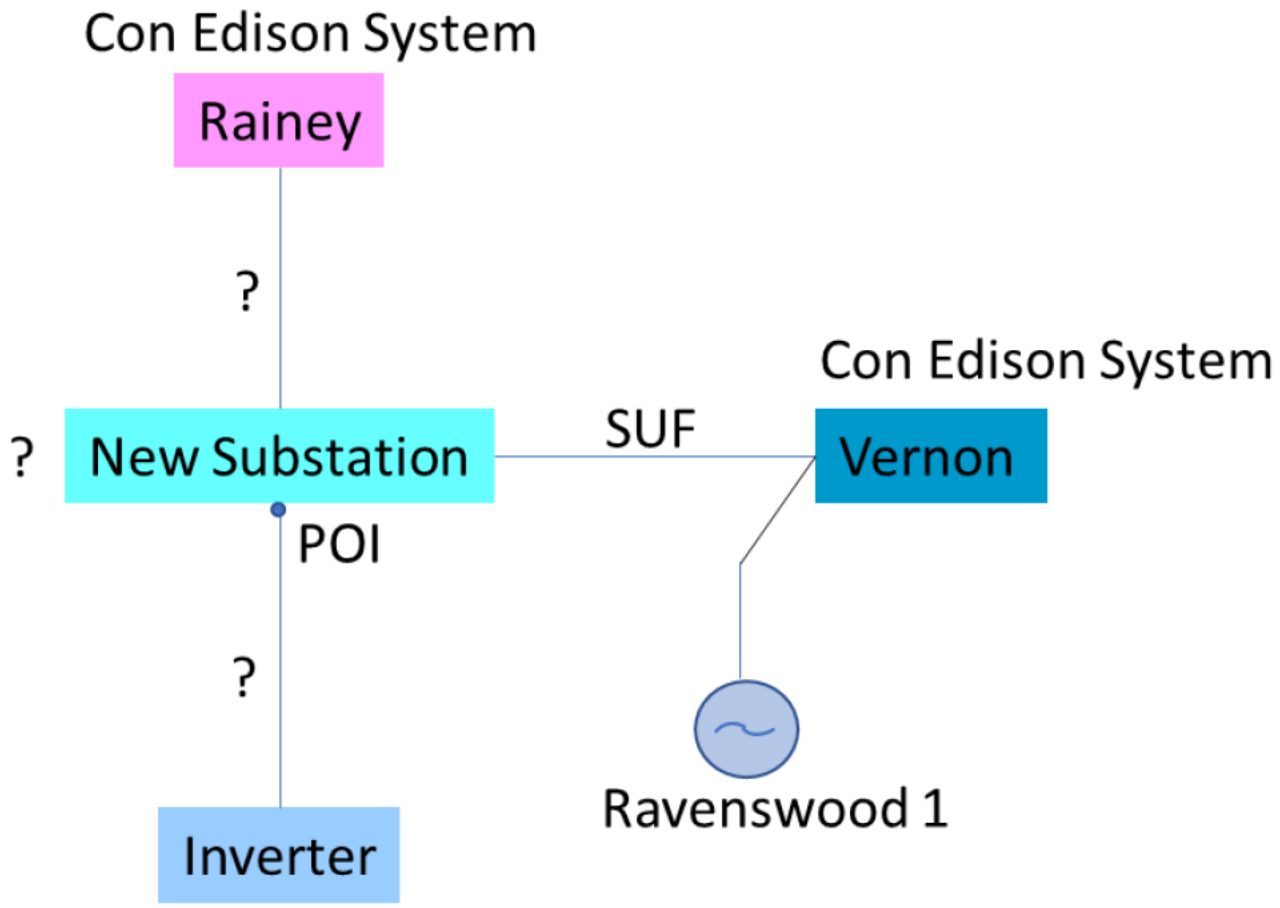
Introduction

- Con Edison does not object to the Project itself and recognizes its benefits in meeting the clean energy objectives set by the State of New York.
- However, we are concerned that the SRIS does not clearly define which facilities are system upgrade facilities (SUFs) versus attachment facilities (AFs)
  - The omission raises reliability concerns with the performance of the SRIS and its results
  - This SRIS may become a precedent for the later cluster SRIS for this project
    - The Project proposes new substation not connected to the transmission system as its POI – novel issue
    - Improper classification can threaten the reliability of system and hinder Con Edison's ability to meet its obligation to serve
- Con Edison is accountable for serving load in New York City and Westchester

Impacts to SRIS

- This project is so atypical that without a clear designation of AFs and SUFs in advance, the work of the SRIS cannot be carried out effectively
- SUFs must be designed to meet our design criteria, whereas AFs do not
  - AFs are single use facilities: they are used solely by the generator, to connect its facility to the POI
  - SUFs, by contrast, must meet Con Edison's design criteria because power flows through SUFs to serve load.
  - Because SUFs become part of the integrated transmission system operated by Con Edison, they must meet Con Edison’s reliability criteria.
- Because the designations drive the criteria that apply, they must be made before the study can begin.
  - If it is not understood what the facilities are, their impacts cannot be studied.
- Therefore, in this case, the designations can, and must, be made now.
  - The NYISO Tariff contains clear definitions that can and must be applied
  - 9 Months since scoping meeting and this issue has not been resolved

The Project's Interconnection-Related Facilities



Atypical Configuration

- The project's POI is not on the existing system
- The segment between the New Substation and Con Edison's Vernon substation is characterized as an elective SUF, which would be built to Con Edison's criteria
- The Scope document is silent on the characterization of all other segments and the new substation (see question marks)
- The project introduces a new transmission path between the Vernon and Rainey substations, in parallel with paths in the interconnected Con Edison system
- The project requires the retirement of the Ravenswood 1 generating unit to connect the elective SUF segment at the same position at the Vernon substation

A CTO's Reliability Concerns Warrant Serious Consideration

- Con Edison does not take a decision to appeal lightly, but in this case, the implications for this study and a potential precedent for the future are concerning
  - As we transition to the new interconnection process compliant with Order No. 2023, it will be more important than ever to get study scopes right up front, as both the CTO and NYISO will be under pressure to complete studies within a defined time
  - The process must allow room for NYISO, the CTO, and the developer to resolve these issues, and we are deeply concerned by the process followed in this instance, where the OC, at the behest of the NYISO, approved a study scope over the objections of the CTO

Motion

- We understand the timing issues at play and the need to approve the SRIS study before the transition to the new interconnection process, and we are interested in working constructively with the NYISO, the developer, and stakeholders to resolve this issue.
- Therefore, Con Edison offers the Management Committee two options to proceed:
  - Reject the applicable SRIS Scope in its present form, and require that the SRIS Scope be resubmitted for OC approval with the interconnection related components clearly characterized in accordance with the NYISO OATT

  or
  - Accept the SRIS Scope, but require the NYISO to define, and the OC to approve, this characterization before the SRIS can proceed