

Notice of Con Edison Appeal to the Management Committee
of
Operating Committee Approval of SRIS Scope:
Queensboro Renewable Express Circuit A Project

Pursuant to Section 7.13 of the NYISO Agreement, Consolidated Edison Company of New York, Inc. (“Con Edison” or “CTO”) hereby appeals to the NYISO Management Committee (“MC”) the November 16, 2023 Operating Committee (“OC”) approval of the Large Generating Facility - Interconnection System Reliability Impact Study (“SRIS”) Scope of Queue #1493: Queensboro Renewable Express Circuit A Project (Project”) being developed by Queensboro Development, LLC (“Developer”). Con Edison appeals the OC ruling to create a record and put the MC on notice of its reliability concerns should these issues arise as a result of the OC’s approval of an ambiguous, undefined SRIS Work Scope and the OC’s unwillingness to properly address the concerns raised by the Connecting Transmission Owner.

Although Con Edison does not object to the Project and recognizes its benefits in meeting the clean energy objectives set by the State of New York, approving an SRIS without addressing reliability concerns puts the cart before the horse. An SRIS should not be carried out until these reliability concerns are addressed in a meaningful manner. Indeed, the clarifications sought by Con Edison and summarily rejected by NYISO should be included in the SRIS Scope so that they can be addressed while performing the SRIS.

Con Edison Concerns:

The Project, as described in the approved SRIS Scope, is atypical, and in some cases unprecedented, from the great majority of SRIS scopes in two main aspects:

1. The Point of Interconnection (“POI”) of the project is not on an existing substation of the New York State Transmission System (“NYSTS”) but rather on a New Substation that is not part of the NYSTS and that is to be connected to two separate substations in the Con Edison system, Rainey and Vernon, neither of which are stated as POIs. Normally, project elements up to a POI that is on the NYSTS are all radial Attachment Facilities (“AF”) and are sole use elements by the energy produced by the generator seeking to interconnect, as required by the NYISO OATT. While this is also the case in the Project, the characterizations of the New Substation and the connections to Rainey remain undefined yet the connections to Vernon are identified as elective System Upgrade Facilities (“SUFs”). The Project creates a system third party flow path (not sole use) between the two Con Edison mentioned substations through the New Substation, a seeming expansion of the NYSTS within a generation interconnection project.

Until the above issues are clarified, the NYISO cannot proceed with this SRIS in an effective manner. Since SUFs must be designed in accordance with the CTO design criteria, the proposed configuration may need to be modified if any of the undefined elements are designated as such.

2. The Project proposes that the connection to Vernon be at the same breaker positions currently used by the Ravenswood 1 generating station, owned by the same parent company of the Developer. The SRIS Scope states in footnote 3 that the Developer proposes to retire this generating unit. At the OC, the Developer clarified that it proposes to submit to the NYISO a notice of retirement for Ravenswood 1. While this action is technically not part of the Project, its retirement is an integral part of the Project's interconnection. The SRIS Scope is silent on the potential impact that this retirement may have if the Generation Deactivation Assessment process finds that the retirement causes a reliability impact on the NYSTS. The impact should be addressed by the NYISO before this SRIS is carried out in order for the SRIS to be effective.

The Project proposes that the SRIS evaluate reliability Impact, as it is normally done, by studying first the pre-existing system prior to the Project and afterwards three post-Project cases. It can be clearly assumed that for the post-Project cases, the Ravenswood 1 generating unit must already be retired. However, the SRIS Scope is silent on the timing of the retirement of Ravenswood 1. Specifically, it is important to know if the pre-existing system conditions represented in the study are prior to or after the Ravenswood retirement. The databases of all cases must not only reflect the status of Ravenswood 1 but must also reflect the solution to any reliability impact caused by its retirement.

Absent modification of the OC's ruling, Con Edison will perform its work assignments in this Project's SRIS and will be vigilant that the SRIS be carried out addressing the reliability issues mentioned in this extraordinary appeal so that the results of the SRIS are meaningful. The MC is hereby placed on notice by this appeal and cautions that any arising reliability issues herein mentioned not properly addressed to Con Edison's satisfaction will only slow down and hinder the very goals of this project. In the interim, Con Edison asks that this appeal be held in abeyance by the MC for potential further action pending consideration of these reliability issues in the SRIS.