

Notice of Con Edison's Modified Appeal to the Management Committee
Of the
Operating Committee's Approval of SRIS Scope
of 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 because it's failure to clearly classify the interconnection related facilities (depicted below) as System Upgrade Facilities ("SUFs") and/or Attachment Facilities ("AF"), as defined in and consistent with the NYISO OATT, within the SRIS Scope raises reliability concerns. The OC and NYISO have been unwilling to properly address the legitimate concerns raised by Con Edison, the Connecting Transmission Owner (CTO) in this case.

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, approving an SRIS Scope without first addressing facilities classifications – which are needed to effectively execute this SRIS – raises reliability concerns that should be meaningfully addressed before an SRIS is conducted. 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 at least one respect that is germane to this appeal.

That is, 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 radial Attachment Facilities and sole use elements by the energy produced by the generator seeking to interconnect, as required by the NYISO OATT. Consequently, in the normal case, not having the AFs identified and characterized in the Scope document raises no reliability concerns.

By contrast, in the case of the Queensboro project, while the generation is radial up to the POI, the POI itself is not on the NYSTS. The characterizations of the New Substation and the connections to Rainey remain undefined, yet the connections to Vernon are identified as elective SUFs (see Project conceptual diagram below). Since SUFs must be designed in accordance with the CTO design criteria, the proposed configuration may require modification if any of the undefined elements are designated as such. While it would be an oxymoron to have a POI *not* on

the NYSTS, it would also be problematic to have AFs beyond a POI (if so designated) that would not be part of the NYSTS.

Finally, 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. For these reasons, the SRIS Scope is fundamentally deficient and raises potential reliability concerns that warrant clarification before the SRIS is conducted. The OC should not have approved this SRIS Scope.

At the OC, and in prior conversations with the NYISO, Con Edison offered to mutually agree that, in this case, assigning the appropriate characterizations of interconnection related elements in accordance with the NYISO OATT and all reliability standards, be the first step in the process, but this was rejected. As the CTO, we are entitled and expected to raise reliability concerns, which even NYISO has conceded are legitimate, be addressed. Until this issue is clarified, the NYISO should not proceed with this SRIS.

In summary, Con Edison seeks that the MC (1) reject the SRIS Scope in its present form, and rather require that it be resubmitted for OC approval with the below interconnection related components properly and clearly characterized in accordance with the NYISO OATT or alternatively (2) accept the SRIS Scope in its present form, but require the NYISO to define, and the OC to approve, this characterization before the SRIS can proceed.

