

Ravenswood Operations, LLC (f/k/a Helix Ravenswood, LLC)

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Date: December 15, 2023

RE: Response to Con Edison's Modified Appeal to the Management Committee of the Operating Committee's Approval of SRIS Scope Queue # 1493 for Queensboro Renewable Express Circuit A Project

To: Glenn Haake – Management Committee Chair
Debbie Eckels – Secretary to Management Committee
For inclusion with the December 20, 2023 Management Committee Meeting Materials:

Pursuant to Section 15.03 of the Management Committee By-Laws, Ravenswood Operations, LLC and Queensboro Development, LLC (“Respondents”) hereby file this motion in opposition to the appeal filed by Consolidated Edison Company of New York, Inc. (“Con Edison”) as modified on December 13, 2023. This matter was fully discussed at the November 2, 2023 Transmission Planning Advisory Subcommittee meeting. Following a TPAS recommendation for the matter to be presented to the Operating Committee, the matter was again fully discussed at the subsequent November 16, 2023 Operating Committee meeting. Several points raised and responded to by NYISO Staff and Respondents at the Operating Committee resulted in approval of the SRIS Scope for Queue #1493. There was only one vote against, which was made by Con Edison; no party abstained

As noted at the Operating Committee, Con Edison stated it was not against the project itself but instead concerned that certain elements included in the study were not characterized in the Scope document which Con Edison asserted would raise reliability concerns. Respondents do not agree that performing a study as described creates any reliability issues because it is merely a study. Moreover, at the Operating Committee, Respondents noted numerous times that it has been, and continues to be, committed to work with Con Edison and the NYISO during the study process to ensure any reliability issues or characterizations that are necessary in accordance with the NYISO Services Tariff would be addressed at the appropriate time.

Con Edison was given the opportunity, and did, fully vet its issues at the TPAS meeting and, again, at the OC meeting. The NYISO specified that it could not support Con Edison's request because (i) it went beyond requirements placed on studies, (ii) the issues will be addressed in the study itself and (iii) the NYISO expressly stated that it could not accept the conditions Con Edison was proposing because they did not agree that they were acceptable provisions. Following this full discussion, a motion to approve the study scope was made and seconded and the matter was presented to the Operating Committee for action. Again, Con Edison was the only party to voice opposition with no abstentions registered.

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Respondents and its affiliates have expended substantial time and resources to develop a comprehensive plan to transform the Ravenswood site in New York City to address the State's clean energy initiatives and facilitate the State's effective and timely implementation of its Climate Act mandates. As the Respondents have also expressed, it remains committed to partner with the State to advance its clean energy initiatives and this project is a cornerstone of that effort at an existing, large generating facility site located in a prime part of the system. Advancing study work while NYISO's Order No. 2023 compliance efforts are pending remains a critical need, particularly for projects with NYSERDA awards, to ensure they can be timely permitted, constructed and brought into commercial operation. The NYISO is currently developing its proposed plan to revamp its entire interconnection process in compliance with FERC Order No. 2023. While this effort is underway, the NYISO will continue to complete study work for projects that have met certain milestones and are willing to fund ongoing studies. To ensure time is efficiently spent pending implementation of the new Order No. 2023 interconnection processes, Respondents have elected to proceed with these study opportunities to best advance their project.

In short, this is the last chance to have an SRIS study completed and it is expected to provide critical information for the project. Without this information, the Project will be deprived of critical study information that is necessary to proceed through permitting and to development.

Finally, as Respondents have repeatedly indicated, consistent with the well-known and longstanding approach applied to interconnection studies, they will continue to work diligently and cooperatively with the NYISO and Con Edison through the study process to address any issues that require resolution therein.

Sincerely,

/s/

James M. D'Andrea, Esq.

Attorney for

Ravenswood Operations, LLC

Queensboro Development, LLC

Cc: Alex Schnell