

A large offshore wind turbine is shown in the foreground, with its three blades extending upwards. In the background, another smaller wind turbine is visible on the horizon over the ocean. The entire image is overlaid with a blue grid pattern.

New York City Offshore Wind Public Policy Transmission Planning Report

**A Report from the New York
Independent System Operator**

September 10, 2025

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Overview

This report summarizes the key steps of the Public Policy Transmission Planning Process administered by the New York Independent System Operator, Inc. (NYISO) for the New York City Offshore Wind Public Policy Transmission Need (“NYC PPTN”) in the two years between the identification and the withdrawal of the NYC Need by the New York Public Service Commission (NYPSC) on July 17, 2025. Additionally, this report includes stakeholder feedback on NYISO’s administration of the process for the NYC PPTN.

The NYISO initiated its 2022-2023 cycle of the Public Policy Transmission Planning Process by soliciting proposed transmission needs that stakeholders or interested parties believe are driven by Public Policy Requirements. The NYISO filed for consideration by the NYPSC the proposed transmission needs, which the NYPSC published for public comment pursuant to the State Administrative Procedure Act. Upon considering the various comments submitted, the NYPSC issued an order on June 22, 2023, that identified the Climate Leadership and Community Protection Act (CLCPA) as a Public Policy Requirement driving the need for additional transmission to deliver offshore wind generation to New York City interconnection points. That order called for a “complete, end-to-end solution” that will accommodate the full output of at least 4,770 MW of incremental offshore wind generation injected into New York City (Zone J), with the ability for the NYISO to consider and evaluate offshore wind generation injections as high as 8,000 MW. In addition, the NYPSC required Consolidated Edison Company of New York, Inc. (“Con Edison”) to closely coordinate with developers by identifying and sharing information on locations that would be cost-effective options for interconnecting transmission infrastructure.

Following a series of technical conferences in collaboration with the New York State Department of Public Service (NYDPS) and Con Edison, the NYISO’s solicitation for solutions opened on April 4, 2024. The NYISO received 28 project proposals from four developers on June 17, 2024. On October 29, 2024, the NYISO published the Viability & Sufficiency Assessment, which found that all 28 of the proposed projects are viable and sufficient to meet the minimum requirements of the NYC PPTN.

The NYISO commenced a detailed evaluation of each viable and sufficient transmission proposal with the assistance of its independent consultants. The NYISO presented preliminary evaluation results to stakeholders at the June 25, 2025 joint Electric System Planning Working Group / Transmission Planning Advisory Subcommittee meeting.

On July 17, 2025, the NYPSC issued an order withdrawing the NYC PPTN and, as required by the tariff, ended the NYISO’s ongoing evaluation of the NYC PPTN. On July 23, 2025, the NYISO presented to the

ESPGWG and TPAS the steps to finalize the 2022-2023 cycle of the NYISO's Public Policy Transmission Planning Process , including a request for feedback from stakeholders regarding what the NYISO did well in the administration of the process and what the NYISO could improve in its administration of future cycles of the planning process.

1. New York City Offshore Wind Public Policy Transmission Need

1.1 The Public Policy Transmission Planning Process

The Public Policy Transmission Planning Process (“Public Policy Process”) is part of the NYISO’s Comprehensive System Planning Process and considers transmission needs driven by Public Policy Requirements. The Public Policy Process was developed in consultation with NYISO stakeholders and the New York Public Service Commission (NYPSC) and was accepted by the Federal Energy Regulatory Commission (FERC) as compliant with the requirements of Order No. 1000. At its core, the Public Policy Process provides for the NYISO’s evaluation and selection of transmission solutions to satisfy a transmission need driven by a Public Policy Requirement(s). The process encourages both incumbent and non-incumbent transmission developers to propose projects in response to an identified need.

The NYISO is responsible for administering the Public Policy Process in accordance with Attachment Y to its Open Access Transmission Tariff (OATT). Consistent with its obligations to regulate and oversee the electric industry under New York State law, the NYPSC has the primary responsibility for the identification of transmission needs driven by Public Policy Requirements.

A Public Policy Process cycle commences every two years following the posting of the draft *Reliability Needs Assessment* study results and consists of four core steps: (1) the identification of a Public Policy Transmission Need by the NYPSC, (2) developers’ submissions of proposed solutions to address the identified Public Policy Transmission Need, (3) an evaluation of the viability and sufficiency of the proposed Public Policy Transmission Projects and Other Public Policy Projects, and (4) a comparative evaluation for the NYISO Board of Directors to select the more efficient or cost-effective Public Policy Transmission Project that satisfies the Public Policy Transmission Need. If the Board of Directors selects a Public Policy Transmission Project, the responsible Designated Entity(ies) is eligible for cost allocation and cost recovery under the OATT.

1.2 New York City Offshore Wind Public Policy Transmission Need

On August 31, 2022, the NYISO issued a letter inviting stakeholders and interested parties to submit proposed transmission needs driven by Public Policy Requirements to the NYISO on or before October 31, 2022.¹ On November 3, 2022, the NYISO posted proposed transmission needs driven by Public Policy Requirements submitted by seventeen entities to the NYISO website and submitted the same to the

¹ The requirements for the Public Policy Transmission Planning Process are set forth in Attachment Y of the OATT and the NYISO Public Policy Transmission Planning Process Manual (“Public Policy Manual”).

NYPSC.² On November 8, 2022, the NYISO also submitted to the Long Island Power Authority nine proposals for transmission needs that, as proposed, would require a physical modification to transmission facilities in the Long Island Transmission District. On December 21, 2022, the NYPSC published the proposed needs in the State Register for comments in accordance with the State Administrative Procedure Act.³

Following the public comment period, the NYPSC issued an order on June 22, 2023 establishing the NYC PPTN (hereinafter, “2023 Order”).⁴ Specifically, the NYPSC identified the Climate Leadership and Community Protection Act (CLCPA) as a Public Policy Requirement driving the need for additional transmission to deliver offshore wind generation to New York City interconnection points. However, the New York Harbor and the City of New York are heavily constrained areas for infrastructure development and require extensive planning, permitting, and coordination to perform construction. The NYPSC recognized that to meet the CLCPA offshore wind targets in a cost-effective manner, the build out of transmission paths routed to New York City must be coordinated and timely. The NYC PPTN, therefore, called for a “complete, end-to-end solution” that will accommodate the full output of at least 4,770 MW of incremental offshore wind generation injected into New York City (Zone J), with the ability for the NYISO to consider and evaluate offshore wind generation injections as high as 8,000 MW.

In referring the NYC PPTN to the NYISO to solicit solutions in the Public Policy Process, the NYPSC identified technical requirements for the NYC PPTN, stating that:

The [NYPSC] finds that the CLCPA constitutes a Public Policy Requirement driving the need for transmission to support the injection of offshore wind generation into New York City (NYISO Zone J). Solicitations to that need shall:

- 1) Accommodate the full output of at least 4,770 MW of incremental offshore wind generation injected into New York City (Zone J), under applicable reliability standards, without reducing the overall output of other renewable resources interconnected in Zones J and K.

² The NYISO posted these submittals on its Planning Studies website under “Proposed Needs” contained within the “Public Policy Documents” folder on the NYISO’s Planning Studies website, which can be accessed at: <https://www.nyiso.com/cspp>.

³ Notice of Proposed Rulemaking, Proposed Public Policy Transmission Needs/Public Policy Requirements, As Defined Under the NYISO Tariff, New York State Register (December 21, 2022), available at <https://dos.ny.gov/system/files/documents/2022/12/122122.pdf>.

⁴ Case No. 22-E-0633, *Matter of New York Indep. Sys. Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, Order Addressing Public Policy Requirements for Transmission Planning Purposes (June 22, 2023), at 45-46 (“2023 Order”), available at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={A077E488-0000-C217-BAED-C4B0826480C5}>.

- 2) Consist of complete end-to-end proposals comprised of both offshore and onshore components to enable power injection into Zone J. The components should include:
 - a. One or more offshore interconnection point(s);
 - b. Offshore transmission (i.e., submarine cables);
 - c. Sites for cable landing points;
 - d. Onshore transmission path(s) (i.e., terrestrial cables) from cable landing points to points of interconnection (POIs) in Zone J, including sites for converter stations, if necessary; and
 - e. Necessary improvements to and/or expansion of the existing onshore transmission system.
- 3) Include plans for how offshore wind generation would interconnect to the end-to-end transmission proposal at the offshore interconnection points. Examples may include, but are not limited to, individual standalone DC connectors, each for a single offshore wind project; or an offshore substation for HVDC cable(s) and offshore wind project export line(s).
- 4) Demonstrate plans to complete all permitting and construction activities necessary to achieve an in-service date no later than January 1, 2033.⁵

In the 2023 Order, the NYPSC also specified the following criteria for the NYISO to consider in its evaluation in accordance with its OATT:

- 1) Scenarios representing up to 8,000 MW of incremental offshore wind generation injected into New York City should be used to evaluate the performance of proposed solutions with respect to expandability, renewable energy delivery, and other metrics as defined in the OATT;
- 2) Proposed solutions that minimize, to the extent possible, the use of AC submarine cables in constrained areas identified in NYSERDA's 2022 offshore wind solicitation (ORECRFP22-1), pursuant to the Order on Power Grid Study Recommendations shall be valued in the evaluation process;

⁵ *Id.* at Appendix A, p 1.

- 3) Proposed solutions that demonstrate that they do not preclude or foreclose on the ability to expand and/or integrate into a future offshore transmission network shall be valued in the evaluation process;
- 4) No requirement to relieve bulk export constraints on the interface from Zone J to the rest of the New York Control Area during light load conditions.
- 5) Proposed solutions that optimize the use of intended corridors to achieve the intended level of offshore wind integration and account for the findings of NYSERDA's Cable Corridor Assessment shall be valued in the evaluation process; and
- 6) Proposed solutions should take into consideration potential interference and/or synergy with the Long Island Offshore Wind Export PPTN.

In addition to technical requirements and evaluation criteria, the 2023 Order proposes supplemental criteria outlined in its Appendix B for consideration during the NYISO's evaluation and ranking of proposed projects, including twelve design principles for Developers to optimize routing of multiple offshore wind cables in the marine environment, at landfalls, and over land. The 2023 Order also stressed the importance of Developers having the necessary real property rights for the development of their proposed solutions so that they are "in a position to move forward promptly in order to meet the 2033 in-service date."⁶ In doing so, the 2023 Order specified an evaluation criterion to consider the extent that each Developer has the necessary real property rights to implement its proposed Public Policy Transmission Project.⁷

⁶ *Id.* at 43.

⁷ *Id.*

2. Proposed Solutions

2.1 Solicitation for Solutions

After the NYPSC issued the 2023 Order establishing the NYC PPTN, NYISO staff promptly began administering the Public Policy Process to address the identified need. The NYISO established sufficiency criteria in accordance with the criteria specified by the NYPSC in the 2023 Order, as well as clarifications issued by the New York Department of Public Service (NYDPS) staff on the NYC PPTN.⁸ After extensive discussion with stakeholders, NYISO staff created the baseline power flow study cases and a technical guidance document for consideration in designing proposed solutions.

Prior to issuing a solicitation for proposed Public Policy Transmission Projects and Other Public Policy Projects to address the NYC PPTN, the NYISO actively engaged with stakeholders through its governance process and two technical conferences held on November 6, 2023 and December 7, 2023. The NYISO also addressed questions from Developers and other interested parties seeking clarification on the process and the criteria to be used by the NYISO to assess proposed solutions. The NYISO summarized the questions and provided responses in four public Frequently Asked Questions (FAQ) documents.⁹ Appendix A includes a complete list of NYISO stakeholder presentations and relevant documents.

On April 4, 2024, the NYISO issued a solicitation for Public Policy Transmission Projects and Other Public Policy Projects to address the NYC PPTN. Project proposals were due on or before June 3, 2024.¹⁰ The NYISO further extended the submission deadline to June 17, 2024.

2.2 Proposed Solutions

The NYISO received a total of 28 Public Policy Transmission Projects from four separate Developers—three proposals from EnergyRe Giga-Projects USA, LLC (EnergyRe), three proposals from Viridon New York Inc. (Viridon), ten proposals from New York Transco, LLC (Transco), and twelve joint proposals from the New York Power Authority (NYPA) & LS Power Grid New York Corporation I (LS Power).¹¹ The NYISO

⁸ The NYC Offshore Wind Q&A documents issued by NYDPS can be found on the NYISO website at <https://www.nyiso.com/cspp> under the “NYC Offshore Wind PPTN” folder.

⁹ The NYC Offshore Wind PPTN FAQ documents are posted on the NYISO website at <https://www.nyiso.com/cspp> under the “NYC Offshore Wind PPTN” folder.

¹⁰ The NYC Offshore Wind PPTN Solicitation is posted at: <https://www.nyiso.com/documents/20142/40894368/New-York-City-Offshore-Wind-Public-Policy-Transmission-Need-Project-Solicitation.pdf/90f7cebe-e8f0-e094-1aa1-f61cc55dd84f>.

¹¹ All of the Developers that submitted proposed Public Policy Transmission Projects to the NYC PPTN were qualified transmission developers in accordance with the Attachment Y of the OATT. See <https://www.nyiso.com/documents/20142/1395552/List-of-Qualified-Developers.pdf/0bfd049b-e386-dc01-780f-7ccc928fd138>

posted a brief description of the proposed projects on its website.¹² The Developers presented an overview of their proposed projects at the January 6, 2025 Transmission Planning Advisory Subcommittee (TPAS)/Electric System Planning Working Group (ESPWG)¹³ meeting.

Figure 1: Proposed Public Policy Transmission Projects

Developer	Project Name	Project #
EnergyRe Giga-Projects USA, LLC	Clean Borough Power Link #1	T102
EnergyRe Giga-Projects USA, LLC	Clean Borough Power Link #2	T103
EnergyRe Giga-Projects USA, LLC	Clean Borough Power Link #3	T104
Viridon New York Inc.	Liberty Link 1	T105
Viridon New York Inc.	Liberty Link 2	T106
Viridon New York Inc.	Liberty Link 3	T107
New York Transco, LLC	Energy Link New York Solution 1	T108
New York Transco, LLC	Energy Link New York Solution 2	T109
New York Transco, LLC	Energy Link New York Solution 3	T110
New York Transco, LLC	Energy Link New York Solution 4	T111
New York Transco, LLC	Energy Link New York Solution 5	T112
New York Transco, LLC	Energy Link New York Solution 6	T113
New York Transco, LLC	Energy Link New York Solution 7	T114
New York Transco, LLC	Energy Link New York Solution 8	T115
New York Transco, LLC	Energy Link New York Solution 9	T116
New York Transco, LLC	Energy Link New York Solution 10	T117
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Mint	T118
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Sage	T119
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Olive	T120
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Kelly	T121
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Hazel	T122
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Navy	T123
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Royal	T124
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Cobalt	T125
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Ruby	T126
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Rose	T127
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Honey	T128
NYPA & LS Power Grid & New York Corporation I	Five Boro Energy Connect – Golden	T129

¹² The NYC Offshore Wind PPTN Initial Project Description is posted on the NYISO website at <https://www.nyiso.com/documents/20142/40894368/New-York-City-Offshore-Wind-PPTN-Project-Descriptions.pdf/30e66bde-7e68-11da-b4a3-9b0b2569f18b>

¹³ The Developers' presentations of their project proposals can be found with the January 6, 2025 ESPWG meeting material <https://www.nyiso.com/tpas?meetingDate=2025-01-06>

2.3 Characterization of Project Facilities

In 2021, the NYISO implemented procedures to address certain reserved rights of transmission owners to build, own, and recover the cost of upgrades to their existing transmission facilities. In accordance with those procedures, the NYISO identified new transmission facilities and Public Policy Transmission Upgrades contained in the proposed Public Policy Transmission Projects by posting to its website an initial characterization of project facilities. Several parties disputed the characterization of specific facilities.¹⁴ Following an attempt to address the disputes through the procedure set forth in the tariffs, the NYISO posted a final list of facility characterizations to its website on October 30, 2024.¹⁵

3. Project Assessments

3.1 Viability and Sufficiency Assessment

The Viability & Sufficiency Assessment is a pass/fail test to screen whether each of the 28 proposed projects is capable of satisfying the minimum criteria to address the NYC PPTN. The Viability & Sufficiency Assessment found that the 28 proposed Public Policy Transmission Projects are viable and sufficient to address the NYC PPTN. The NYISO presented the draft Viability & Sufficiency Assessment Report¹⁶ to stakeholders and filed it with the NYPSC on October 30, 2024. The NYPSC subsequently received comments¹⁷ in response to a State Administrative Procedure Act Notice published in the New York State Register on December 4, 2024.¹⁸

3.2 Preliminary Evaluation

The Developers of all 28 viable and sufficient Public Policy Transmission Projects elected to proceed with the NYISO's evaluation for purposes of selection as the more efficient or cost-effective solution to the NYC PPTN. The NYISO commenced a detailed evaluation of each viable and sufficient transmission project with the assistance of its independent consultants, Substation Engineering Company (SECO), RBJ

¹⁴ The NYC Offshore Wind PPTN Initial Facility Characterization List is posted on the NYISO website at <https://www.nyiso.com/documents/20142/40894368/NYC-PPTN-Comments-Initial-Facility-Characterization.zip/24bb4153-26ee-37e0-1c00-7b531726c823>

¹⁵ The NYC Offshore Wind PPTN Final Facility Characterization List is posted on the NYISO website at <https://www.nyiso.com/documents/20142/40894368/NYCPPTN-Final-Facility-Characterization-List.pdf/b65b029f-7d2c-63df-bac0-6828526658a0>

¹⁶ The NYC Offshore Wind PPTN Viability and Sufficiency Assessment report is posted on the NYISO website at <https://www.nyiso.com/documents/20142/40894368/New-York-City-Offshore-Wind-PPTN-Viability-and-Sufficiency-Assessment.pdf/f0f11b6f-bd1f-93ec-89bf-452fc280d626>

¹⁷ Case No. 22-E-0633, *Matter of New York Indep. Sys. Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=22-E-0633>

¹⁸ N.Y. Register, December 4, 2024 at 14, available at <https://dos.ny.gov/system/files/documents/2024/12/120424.pdf>.

Engineering, and ECI Consulting. NYISO staff presented preliminary evaluation results and independent cost estimates at the June 25, 2025 ESPWG/TPAS meeting.

4. Withdrawal of Public Policy Transmission Need

On July 17, 2025, the NYPSC issued an order withdrawing the NYC Need.¹⁹ With the issuance of that order, Section 31.4.6.7 of the OATT requires the NYISO to not complete its evaluation of proposed solutions to address the NYC Need. The NYISO halted the evaluation prior to any ranking of the projects and no recommendation was made to the NYISO Board for selection of a Public Policy Transmission Project as the more efficient or cost-effective solution.

5. Stakeholder Feedback

On July 23, 2025, the NYISO presented to the ESPWG and TPAS the steps to finalize the 2022-2023 cycle of the NYISO's Public Policy Process, including a request for feedback from stakeholders regarding NYISO's administration of the process for the NYC PPTN. Feedback was received by four parties—EnergyRe, NYPA/LS Power, Transco, LLC, and Consolidated Edison Company of New York, Inc.—and can be found in Appendix B.

¹⁹ Case No. 22-E-0633, *Matter of New York Indep. Sys. Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, Order Withdrawing Public Policy Transmission Need (July 17, 2025), available at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={00048A98-0000-C14F-B8E3-434D70F1B6E2}>

Appendix A

New York City Offshore Wind Public Policy Transmission Planning Report

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September 10, 2025



New York City PPTN Data Catalog

Stakeholder Presentations

July 25, 2023

[NYC PPTN Update](#)

August 22, 2023

[NYC PPTN Update](#)

[PPTPP Lessons Learned](#)

September 21, 2023

[NYC PPTN Update](#)

October 2, 2023

[NYC PPTN Update](#)

October 24, 2023

[NYC PPTN Update](#)

November 2, 2023

[NYC PPTN Update](#)

November 6, 2023

[NYISO Technical Conference](#)

November 21, 2023

[NYC PPTN Update](#)

December 7, 2023

[NYISO Technical Conference](#)

December 19, 2023

[PPTPP Manual Updates](#)

January 23, 2024

[NYC PPTN Update](#)

February 6, 2024

[NYC PPTN Update](#)

February 22, 2024

[NYC PPTN Update](#)

March 8, 2024

[NYC PPTN Update](#)

March 21, 2024

[NYC PPTN Update](#)

June 7, 2024

[NYC PPTN Update](#)

August 6, 2024

[NYC PPTN Update](#)

September 27, 2024

[NYC PPTN Update](#)

October 21, 2024

[NYC PPTN Update](#)

January 6, 2025

[NYC PPTN Update](#)

May 21, 2025

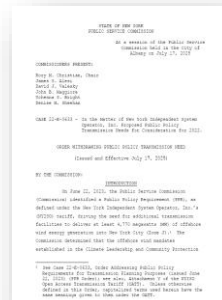
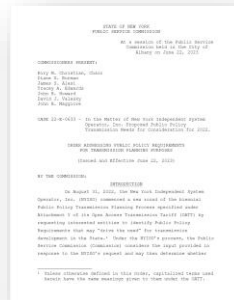
[NYC PPTN Update](#)

June 25, 2025

[NYC PPTN Update](#)

PSC Order 2023

PSC Order 2025



Other Documents

[DPS/NYISO PSC Order Q&A Document](#)

[NYISO CEII Data Request Form](#)

[Con Edison NYC PPTN Related Website](#)

[NYSERDA Offshore Wind Cable Corridor Constraints Assessment](#)

[Agency Working Group Technical Conference Presentation](#)

[Con Edison Technical Conference Presentation](#)

[Con Edison FAQs](#)

[NYISO FAQs #1](#) [NYISO FAQs #2](#) [NYISO FAQs #3](#) [NYISO FAQs #4](#)

[DPS PSC Order Q&A Document \(Jan 2024\)](#)

[DPS PSC Order Q&A Document \(Feb 2024\)](#)

[DPS NYC PPTN Letter to NYISO](#)

[Attachment B, Q13 – NYC PPTN Information Request Form](#)

[NYCPPTN Final Facility Characterization List](#)

[NYC PPTN Viability and Sufficiency Report](#)

Appendix B

New York City Offshore Wind Public Policy Transmission Planning Report

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September 10, 2025



Stakeholder Feedback NYC Offshore Wind PPTN

Stakeholder Feedback energyRe

energyRe Comments | NYISO's Administration of the Public Policy Transmission Planning Process for the NYC PPTN

energyRe appreciates the NYISO's diligence and professionalism throughout the New York City Public Policy Transmission Need (PPTN) process. Despite the cancellation of the solicitation, we commend the NYISO for maintaining strong engagement with stakeholders, honoring process transparency, and sustaining momentum under the constraints of the current tariff.

We offer the following feedback, based on our participation in the solicitation and our broader experience with the Public Policy Transmission Planning Process:

Positive Aspects of NYISO Administration

- NYISO staff did an excellent job facilitating dialogue with stakeholders through ESPWG/TPAS, including the provision of well-organized technical guidance, timely responses to clarifying questions, and high-quality data packages to support modeling efforts.
- NYISO's consistent application of tariff-defined procedures and metrics throughout the Viability and Sufficiency Assessment (VSA) phase contributed to a sense of procedural fairness.
- We appreciated the openness and responsiveness of NYISO staff to stakeholder questions, particularly given the evolving complexity of coordinating interconnection and cost recovery within the context of competitive transmission.

Opportunities for Process Improvement

1. Response Windows

- **Bid Window Duration:** We encourage NYISO and stakeholders to consider adjustments to Attachment Y of the OATT to allow for longer response windows to solicitations. As the scale and complexity of Public Policy Transmission Needs grow, so too does the effort required to prepare complete and high-quality bids. The 60-day window defined in the current tariff may be insufficient for projects of this magnitude and should be revisited.
- **Response Time for RFIs:** Similarly, we recommend extending the 15-day deadline to respond to Requests for Information (RFIs), particularly where the RFI period overlaps with public holidays. In some cases, Developers may need to coordinate with external vendors or conduct internal reviews that require more than 15 calendar days to ensure accurate and complete responses.

2. Revisions to Redacted Proposal Documentation

- We encourage the NYISO to improve transparency and usability in future releases of updated redacted proposal files. Specifically, when the NYISO publishes revised versions of Developers' redacted proposals, the NYISO should include a file manifest or change log summarizing which files have been updated. Without this, it is challenging for stakeholders to determine what has changed across large, complex submissions containing dozens of documents.

3. Cost Recovery for Cancelled Solicitations

- Although we recognize that NYISO has limited discretion on matters of cost recovery under the current tariff, we feel it is important to register our concern regarding the lack of developer cost protection in the event of solicitation cancellation.
- Developers invest millions of dollars in preparing transmission proposals under the assumption that, if not selected, their bids will at least be evaluated and receive a fair hearing under a competitive process. The cancellation of the NYC PPTN after significant developer investment -- and after NYISO had already completed the Viability & Sufficiency Assessment -- may impact developer confidence in New York's competitive transmission framework.
- This asymmetry is exacerbated by the fact that incumbent utilities such as Con Edison are able to flow-through cancellation-related costs via rates, while independent developers must absorb multi-million-dollar losses without recourse.
- If New York intends to preserve a robust competitive transmission process going forward, some mechanism for partial cost recovery in the event of solicitation cancellation should be considered, either via tariff amendment or coordination with the PSC. Even limited cost recovery would help mitigate risk and encourage sustained participation by qualified developers.

Conclusion

We thank the NYISO again for the professionalism and integrity shown throughout the NYC PPTN process. energyRe looks forward to continuing to partner with the NYISO and other stakeholders to deliver transmission solutions that advance New York's clean energy goals.

Stakeholder Feedback NY Transco

August 1, 2025

VIA ELECTRONIC MAIL

stakeholder_services@nyiso.com

New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, New York 12144

Re: New York Transco LLC's Comments Regarding NYC Offshore Wind PPTN Process

To Whom It May Concern,

New York Transco LLC would like to thank the New York State Independent System Operator, Inc. (NYISO) and its staff for its efforts throughout the New York City Offshore Public Policy Planning Process (NYC OSW PPTN) process. We commend the NYISO for demonstrating an independent and unbiased approach in performing the solicitation, viability and sufficiency, and evaluation processes consistent with the NYISO's Open Access Transmission Tariff (OATT) requirements. While it is unfortunate that the NYC OSW PPTN was ultimately canceled, we are confident that the NYISO would have selected the more cost effective or efficient solution to most benefit New York State's power system, protect ratepayers, and support the State's energy goals.

We also appreciate the NYISO's commitment to continuous improvement and its willingness to solicit feedback. Notably, we observed improvements in the NYC OSW PPTN process compared to prior cycles—for example, while there were fewer developer interactions, each provided more substantive information. This enhanced the efficiency and increased transparency. We look forward to seeing further enhancements in future PPTNs.

One area we encourage the NYISO to consider for future improvement is the protection of intellectual property and proprietary commercial material (together, confidential commercial information). The baseline confidentiality protections in the OATT, which are incorporated by reference into Attachment Y, are narrow and, aside from limited instances, do not protect confidential commercial information. As a result, detailed intellectual property and proprietary commercial material included in proposed solutions to a PPTN are disclosed to stakeholders. While historic PPTN solicitations have resulted in a selection, which effectively rendered the details of non-selected projects obsolete, the NYC OSW PPTN process did not and there is a meaningful chance a similar need for transmission will be declared in the future. If that were to occur, future, potential bidders will have the benefit of potentially utilizing the detailed confidential commercial information from NYC OSW PPTN solutions. Such a result is inapposite to the intent of the competitive procurement process, and we do not believe indicative of the intent of the Public Policy Transmission Planning Process. Thus, we recommend the NYISO consider incorporating

a specific—and broader—confidentiality provision into Attachment Y of the OATT that allows for the protection of all confidential commercial information to preserve the integrity of the competitive process, particularly in situations where a selection is ultimately not made.

We appreciate your consideration of this comment and are open to a discussion, if that would be helpful.

Respectfully Submitted,

Paul Haering

Paul Haering
VP Capital Investment
NY Transco LLC

Stakeholder Feedback Con Edison

Con Edison Comments: NYC PPTN Lessons learned

Con Edison appreciates NYISO's effort in its solicitation related to the NYC Public Policy Transmission Need (PPTN) process. The Company found the NYISO to be responsive to stakeholder feedback and the process to be effective through the evaluation phase. With the cancellation of the identified NYC PPTN, the Company offers the following points of constructive feedback to the NYISO for its consideration and implementation. The Company offers these comments to provide clarity and further enhance the PPTN process going forward.

1. The PSC and NYISO should continue to encourage developers and connecting transmission owners to collaborate with one another on the development of project solutions. The ability to collaborate on projects is effective and should continue in future PPTN solicitations. By allowing developers to collaborate with the connecting transmission owner to jointly develop project solutions, developers can better understand the connecting transmission owner's system and the overall quality of PPTN bids is raised.
2. During the evaluation phase, the NYISO provided a risk register that assessed the risk of construction delays in the process based on project characteristics. In the future, the risk register should provide a greater level of transparency on the methodology used to produce the risk results of register items as low, medium, high, and very high risk. The percentage ranges for these categories were also overly broad and made understanding the level of risk difficult (i.e. the range of 10%-90% risk for projects was classified as medium to high).
3. During the Viability and Sufficiency Assessment period, NYISO should disqualify projects that do not meet the solicitation's requirements. In the NYC PPTN, solutions were put forward that weren't complete end to end solutions. These should not have been allowed to continue. Continuing to evaluate these projects beyond the VSA stage takes the focus off the projects that have proven to be viable, sufficient, and meet the solicitation requirements and needlessly consumes NYISO's resources.
4. NYISO should clarify that all facilities proposed by developers that are not required for physical interconnection of the project in a reliable manner, must be classified as part of the proposed PPTN project, *i.e. as new transmission facilities and Public Policy Transmission Upgrades*, not as potential Network Upgrade Facilities. Currently, the tariff language is ambiguous on the characterization of proposed facilities and allows developers to arbitrarily designate facilities as either components of the PPTN project or potential Network Upgrade Facilities (NUFs)

needed for reliable interconnection. Arbitrary identification of project components as NUFs can cause delays, because assignment of responsibility for NUFs occurs only at the end of the Facilities Study phase, while assignment of responsibility for PPTN project components occurs early in the process. Further, classifying parts of the PPTN project as NUFs delays interconnection studies since classification as such requires the NYISO to seek lowest cost alternatives instead of focusing on studying the project as proposed. A language edit in the tariff can be made to reduce uncertainty around this. See below for the suggested edit:

Subsection 31.4.5.1.2 of the current Tariff includes the following statement:

“The work sheets should itemize to the extent applicable and available all equipment for: (i) the proposed project (separately identifying new transmission facilities and Public Policy Transmission Upgrades) and (ii) Network Upgrade Facilities, System Upgrade Facilities, System Deliverability Upgrades, Network Upgrades, Distribution Upgrades, and/or Attachment Facilities, as applicable, that:

(a) the ISO has identified as required to interconnect the proposed project to the New York State Transmission System in compliance with the applicable interconnections standard in an interconnection study or transmission expansion study that is performed under Attachments P, S, X, or HH of the ISO OATT or

(b) the Developer voluntarily identifies as potentially necessary to reliably interconnect the proposed project (subject to modification based on ISO-conducted interconnection or transmission expansion studies, as applicable).”

Part (b) of this section should be clarified by including the following highlighted language:

(b) Interconnection facilities that the Developer voluntarily identifies as potentially necessary to reliably interconnect the proposed project (subject to modification based on ISO-conducted interconnection or transmission expansion studies, as applicable).

Con Edison believes this edit would reduce ambiguity on interconnection facilities as they would be identified as potentially necessary facilities, included as part of the proposed project, and included in the overall project cost assumptions.

Stakeholder Feedback

NYPA, LS Power

Dear NYISO Member Relations:

These comments on the New York City (“NYC”) Public Policy Transmission Need (“PPTN”) process are submitted by the New York Power Authority (“NYPA”) and LS Power (“LSP”) who jointly submitted twelve separate responses to NYISO’s NYC PPTN solicitation. We appreciate the opportunity to submit comments that will enhance the quality of future developer proposals including the fairness and transparency of future evaluations.

Solicitation Information

The PPTN process is best served when all Developers have a full understanding of NYISO’s specific requirements of the need, evaluation priorities and existing conditions. Therefore, NYPA and LS Power recommend that,

- NYISO should finalize and publish the Developer Technical Guidance Document prior to issuing the solicitation.
- NYISO should emphasize a Developer’s strict adherence to the requisites provided in the Developer Technical Guidance Document.
- NYISO should provide potential bidders an opportunity to meet one-on-one with NYISO prior to the proposals being submitted to provide developers an opportunity to explore innovative approaches still under development.
- Prior to issuing the solicitation, NYISO should work with the appropriate Transmission Owner(s) to ensure that developers have access to the necessary Transmission Owner data without barriers or encumbrances beyond those required for confidentiality. If necessary, NYISO should ask the Public Service Commission to include conditions in their Order that ensure Transmission Owners provide access to the data needed to address the need.

Modeling

The integrity of the evaluation process requires accurate modelling of the base system and the proposed solutions. This can be enhanced by NYISO providing more visibility to the detailed base case and project case models used for the PPTN Sufficiency Assessment and Evaluation. This would be similar to the current interconnection process (i.e. NYISO shared the pre-Project and post-Project SIS bases cases) and would allow the developers to help identify any inconsistencies, similar to how NYPA engineers identified errors in the NYISO SIS models for the NYC PPTN solutions. Therefore, NYPA and LSP recommend that NYISO should provide participating Developers the PPTN base case and project case at the

beginning of their evaluation process so that Developers can perform their own analysis and verify that the proposed projects are being modeled accurately by NYISO.

Confidentiality of Innovation

NYISO's PPTN process benefits greatly from the innovation and creativity of the solutions offered by bidders. It must be recognized, however, that the bidders take a significant risk in submitting innovative solutions in the absence of NYISO agreeing to hold a developer's proposed solution as confidential¹. Absent NYISO agreement to handle developer bids as confidential, bidders' willingness in the future to offer the best solutions may be limited. The risk that a novel approach offered by a developer may be divulged is particularly acute in the case of the NYC PPTN, which was cancelled and may at some point in the not-so-distant future be resurrected. We recognize that there may be system changes in the interim limiting the applicability of the solutions offered. Nevertheless, the lack of confidential information protection remains a risk and NYPA and LS Power would recommend that NYISO establish policies and protocols to expand the applicability of confidentiality provisions to more aspects of Developers' solutions.

At a minimum, the NYISO process needs to provide for an ability to protect the confidentiality of third-party confidential information, specifically confidential technical information provided by an Original Equipment Manufacturer.

These recommendations are intended to better the PPTN process, improve solutions to transmission system needs and benefit all New York State ratepayers. We intend to continue to raise these and similar feedback in future discussions at ESPWG/TPAS and in other forums as appropriate.

New York Power Authority

LS Power

¹ NYPA and LS Power recognize that the NYISO OATT, Attachment Y, Section 31.4.15.2 recognizes the right for bidders to identify certain data and financial arrangements as Confidential. We are recommending that these confidentiality provisions be expanded to include engineering solutions submitted as part of the bidder's submissions.