

Resilience Comments

LIPA commends NYISO for undertaking this study of system resilience over a wide range of disruptive events that were postulated to occur during a 15-day cold snap. It serves to highlight key vulnerabilities of the electric system, both statewide and on Long Island in particular. The report's assessment highlights the value of dual-fuel capability, as well as the need to maintain inventories and assure resupply of oil, particularly on Long Island.

The scenarios that presume the retirement of all combustion turbines that currently do not meet DEC's proposed NOx emission standards underline the importance of these units for resilience in extreme conditions and highlights the potential value of DEC's alternative compliance approaches including using water injection, renewable energy and battery storage to bring these units within compliance without retirement.

We support NYISO's proposal to periodically reevaluate key vulnerabilities, including disruptions and vulnerabilities associated with the loss of renewable energy supply as the state pursues renewable development goals enumerated in the Climate Leadership and Community Protection Act (CL&CPA).