

# **ATTACHMENT 1**

**EXHIBIT NO. CECONY-101**

**PREPARED DIRECT TESTIMONY OF BRADFORD L. WINER**

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

New York, Independent System Operator, Inc. Consolidated Edison Company of New York, Inc.) ) ) )	)	Docket No. ER25-__-000
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**PREPARED DIRECT TESTIMONY OF BRADFORD L. WINER**

**I.     INTRODUCTION AND QUALIFICATIONS**

**Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

A. My name is Bradford L. Winer. I am the Director of Transmission Project Development for the Consolidated Edison Company of New York, Inc. (“Con Edison” or “Company”). My business address is 4 Irving Place, New York, NY 10003.

**Q. PLEASE STATE YOUR RESPONSIBILITIES AS DIRECTOR OF  
TRANSMISSION PROJECT DEVELOPMENT.**

A. I am responsible for managing a portfolio of work comprised of developing and executing transmission projects resulting from federal and New York State processes. This includes facilitating third party clean energy projects as well as projects developed through the New York Independent System Operator, Inc.’s (“NYISO”) interconnection process, and planning for and developing emergent Con Edison transmission projects necessary to reinforce and modify Con Edison’s infrastructure to address clean energy, regulatory, and reliability needs.

1 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
2 **PROFESSIONAL EXPERIENCE.**

3 A. I hold a Bachelor of Science degree from Manhattan College and a Master of Business  
4 Administration degree from Fordham University. I am a graduate of the United States Naval  
5 Nuclear Propulsion Program and have completed Siemens PTI's Electric Distribution System  
6 Engineering Course. I have over twenty-two years of utility experience with a focus on  
7 capital project development and execution. I have held various positions with increasing  
8 responsibility at Con Edison, including roles in Steam Operations, Construction, Central  
9 Engineering and System and Transmission Operations. I assumed my current role in August  
10 2022.

11 **Q. HAVE YOU PROVIDED TESTIMONY IN PRIOR PROCEEDINGS BEFORE THE**  
12 **COMMISSION?**

13 A. No. I have not previously provided testimony in proceedings before the Commission.

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 A. Con Edison seeks Commission authorization for an abandoned plant incentive that would  
16 provide for recovery of 100% of its prudently incurred costs associated with its investment in  
17 the Long Island Offshore Wind Export Public Policy Transmission Need ("Long Island  
18 PPTN") Designated Public Policy Project ("Rainey Breakers") if one or more of the Rainey  
19 Breakers are abandoned or cancelled for reasons beyond the control of Con Edison  
20 ("Abandoned Plant Incentive"). Pursuant to requirements of the NYISO's Public Policy  
21 Transmission Planning Process ("Public Policy Process") as set forth in Attachment Y of the  
22 NYISO's Open Access Transmission Tariff ("OATT"), the NYISO identified the Rainey

1 Breakers as upgrades to the Con Edison system and assigned them to the Company as a  
2 Designated Public Policy Project subject to the Company's Right of First Refusal Upgrade  
3 ("ROFR") as set forth in Exhibit No. CECONY-301, the Long Island Offshore Wind Export  
4 Public Policy Transmission Planning Report ("Report"). Through my testimony, I explain  
5 how the Rainey Breakers satisfy the Commission's requirements for the requested  
6 Abandoned Plant Incentive.

7 **Q. WAS YOUR TESTIMONY PREPARED BY YOU OR UNDER YOUR DIRECT**  
8 **SUPERVISION AND CONTROL?**

9 A. Yes. I consulted with subject matter experts in Con Edison's Central Engineering  
10 Department.

11 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

12 A. My testimony provides a description of the Rainey Breakers, their selection by the NYISO  
13 and inclusion in the Propel New York Energy Project ("Propel NY Energy Project"), and  
14 their designation to Con Edison. My testimony also describes how the Rainey Breakers will  
15 provide reliable and economic energy delivery to meet future reliability needs in the NYISO  
16 control area. I discuss the risks and challenges associated with the development of the Rainey  
17 Breakers as part of the Propel NY Energy Project that the Abandoned Plant Incentive would  
18 mitigate. In particular, I explain the risks associated with the Propel NY Energy Project  
19 related to the requirements for regulatory approvals from the federal government as well as  
20 the State of New York, and the various municipalities within New York. I also address the  
21 financial and construction risks associated with executing the Rainey Breakers.

1       **II. ANALYSIS AND SELECTION OF THE RAINEY BREAKERS THROUGH THE**  
2       **LONG ISLAND PPTN PROCESS**

3       **Q. PLEASE BRIEFLY DESCRIBE THE NYISO PUBLIC POLICY TRANSMISSION**  
4       **PLANNING PROCESS.**

5       A. In response to Order No. 1000, the NYISO developed the Public Policy Process which  
6       was subsequently approved by FERC and is fully described in Section 31.4 of Attachment Y  
7       in the NYISO OATT. The Public Policy Process is the NYISO's planning process to consider  
8       Public Policy Requirements that drive the need for expansions or upgrades to the Bulk Power  
9       Transmission Facilities ("BPTFs"). A Public Policy Requirement is defined as:

10       A federal or New York State statute or regulation, including a [Public Service  
11       Commission] order adopting a rule or regulation subject to and in accordance with  
12       the State Administrative Procedure Act, any successor statute, or any duly enacted  
13       law or regulation passed by a local governmental entity in New York State, that  
14       may relate to transmission planning on the BPTFs.<sup>1</sup>

15       The NYISO Public Policy Process is designed to:

- 16       (1) [A]llow Market Participants and other interested parties to propose transmission  
17       needs that they believe are being driven by Public Policy Requirements and for  
18       which transmission solutions should be evaluated[;]
- 19       (2) [P]rovide a process by which the [Public Service Commission] will, with input  
20       from the [NYISO], Market Participants, and other interested parties, identify the  
21       transmission needs, if any, for which transmission solutions should be evaluated[;]
- 22       (3) provide a process whereby Public Policy Transmission Projects and Other Public  
23       Policy Projects are proposed to satisfy each identified Public Policy Transmission  
24       Need and are evaluated by the [NYISO] on a comparable basis[;]
- 25       (4) [P]rovide a process by which the [NYISO] will select the more efficient or cost  
26       effective regulated Public Policy Transmission Project, if any, to satisfy each  
27       identified Public Policy Transmission Need for eligibility for cost allocation under  
28       the [NYISO] Tariffs and will designate the selected Public Policy Transmission  
29       Project or parts of the selected Public Policy Transmission Project to a Designated

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<sup>1</sup> NYISO OATT, 31.1 OATT Att Y New York Comprehensive System Planning Process, § 31.1.1 (29.0.0).

1 Entity or Designated Entities, which will be responsible for developing the  
2 Designated Public Policy Project(s);

3 (5) [P]rovide a cost allocation methodology for the regulated Designated Public  
4 Policy Project(s) that have been selected by the [NYISO] and Designated Network  
5 Upgrade Facilities associated with a selected Public Policy Transmission Project  
6 (if applicable)[;] and

7 (6) coordinate the [NYISO's] Public Policy Transmission Planning Process with  
8 neighboring Control Areas.<sup>2</sup>

9 **Q. PLEASE DESCRIBE THE LONG ISLAND OFFSHORE WIND EXPORT PUBLIC**  
10 **POLICY TRANSMISSION NEED PROCESS.**

11 A. Under the NYISO's Public Policy Process, the NYISO files potential Public Policy  
12 Requirements proposed by stakeholders with the New York State Public Service Commission  
13 ("Public Service Commission"), who then determines whether a need exists. On March 19,  
14 2021, the Public Service Commission identified the need for new and upgraded transmission to  
15 increase the export capability from Long Island to New York City and the rest of New York State  
16 to ensure full deliverability across the state of at least 3,000 MW of offshore wind interconnected  
17 to Long Island. In so finding, the Public Service Commission cited New York's Climate  
18 Leadership and Community Protection Act ("CLCPA"), which requires that New York State  
19 procure at least 9,000 MW of offshore wind generation by 2035. The Long Island coast, with its  
20 proximity to both oceanic waters and dense load centers, has long been recognized for its  
21 potential to receive offshore wind resources to help New York achieve its goal. Following the  
22 Public Service Commission's order, the NYISO conducted a solicitation for solutions to meet the  
23 need and, from among 18 other proposals, selected the Propel NY Energy Project as the more  
24 efficient or cost-effective solution.

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<sup>2</sup> NYISO OATT, 31.1 OATT Att Y New York Comprehensive System Planning Process, § 31.1.5 (29.0.0).

1 **Q. DID NYISO DESIGNATE TO CON EDISON THE RESPONSIBILITY TO**  
2 **CONSTRUCT THE RAINEY BREAKERS AS PART OF NYISO’S SELECTION OF THE**  
3 **PROPEL NY ENERGY PROJECT THROUGH THE LONG ISLAND PPTN PROCESS?**

4 A. Yes.

5 **Q. WHY DID NYISO DETERMINE THAT THE RAINEY BREAKERS WERE NEEDED**  
6 **AS PART OF THE PROPEL NY ENERGY PROJECT?**

7 A. As part of its proposed project solution, the Propel NY Energy Project proposed to modify  
8 Con Edison’s Rainey Substation, including by installing two back-to-back Rainey Breakers.  
9 During the NYISO’s Public Policy Process, the NYISO comprehensively evaluates proposed  
10 projects to ensure each project is a viable and sufficient transmission solution. During this  
11 evaluation, the NYISO determined the Rainey Breakers were required. As noted in the Report,  
12 the selected Propel NY Energy Project “*will effectuate the efficient transfer of power in the*  
13 *future, provided initially for resource planning and expansion needed to achieve the CLCPA*  
14 *mandates.*”<sup>3</sup>

15 **Q. WHY DID NYISO ASSIGN CONSTRUCTION OF THE RAINEY BREAKERS TO**  
16 **CON EDISON?**

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<sup>3</sup> Exhibit No. CECONY-301, *N.Y. Indep. Sys. Operator, Inc.*, Long Island Offshore Wind Export Public Policy Transmission Planning Report (June 13, 2023), available at <https://www.nyiso.com/documents/20142/38388768/Long-Island-Offshore-Wind-Export-Public-Policy-Transmission-Planning-Plan-2023-6-13.pdf>. (emphasis added).

1 A. During the NYISO's Public Policy Process all submitted project facilities are characterized as  
2 either new or upgrade facilities. The Rainey Breakers were identified as upgrade facilities subject  
3 to Con Edison's ROFR and designated to Con Edison consistent with the NYISO Tariff.

4 **Q. DID THE LONG ISLAND PPTN PROCESS CONSIDER THE RELIABILITY**  
5 **IMPACTS OF THE RAINEY BREAKERS?**

6 A. Yes. As part of the NYISO's robust competitive public policy process accepted by the  
7 Commission and as detailed in the Report, the NYISO evaluated each submitted project on ten  
8 criteria, including reliability of system. Reliability is evaluated on two metrics: a NYISO tariff-  
9 based metric and a Public Service Commission order-based metric. As noted in the Report, "the  
10 reliability of the transmission system is also evaluated under the Viability & Sufficiency  
11 Assessment as prescribed by Section 31.4.5 of the Attachment Y to the OATT."<sup>4</sup>

12 As part of its Viability and Sufficient Assessment, and to assess defined system events or  
13 contingencies and to establish power transfer capability, NYISO conducted a power flow study.  
14 When evaluating power flow contingencies, NYISO's transmission planning process accounts  
15 for the possible unavailability of a transmission feeder due to an unplanned outage that would  
16 result from a short circuit on the transmission line. As power redirects in response to the  
17 unavailability of the transmission feeder, power flow may increase on the remaining in-service  
18 feeders. However, the resulting power flow must remain within allowed and established facility  
19 ratings with the aim of preventing additional damage and/or cascading outages on the electric  
20 system.

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<sup>4</sup> *Id.* at 22.



1 The transmission planning process must also evaluate the possible failure of an individual  
2 breaker to properly operate for the short circuit to isolate the damaged transmission feeder or  
3 system element. In such a scenario, systems are designed to isolate the immediately adjacent  
4 transmission element. For these cases, two transmission feeders are made unavailable for this  
5 single hypothetical event. Resulting power flows are again evaluated against facility ratings and  
6 must remain within prescribed limits. In preparation for this possible scenario, system power  
7 flow transfers may need to be limited prior to the occurrence of the hypothetical event to avoid  
8 power flow overloads.

9 By installing the Rainey Breakers (two breakers in series), system planning criteria allows for the  
10 assumption that two independent breakers will not both fail to operate. The net effect of  
11 installing both breakers may therefore result in a higher power transfer capability.

### 12 **III. OVERVIEW OF THE PROPEL NY ENERGY PROJECT AND THE RAINEY** 13 **BREAKERS**

#### 14 **Q. PLEASE DESCRIBE THE PROPEL NY ENERGY PROJECT.**

15 A. The Propel NY Energy Project consists of three new 345 kV AC tie lines from Long Island to  
16 the rest of the state, a 345 kV transmission backbone on Long Island, and required upgrades. It  
17 requires building new underground and submarine electric transmission lines, four new  
18 transmission substations located in some of the most densely populated urban and suburban areas  
19 of the country – New York City, Long Island, and Westchester County, and upgrades to existing  
20 substations (including the Designated Network Upgrade Facilities that are the subject of this  
21 application).

1 Once in service, the Propel NY Energy Project will increase the transfer limit of the Long Island  
2 export interface by 2,265 MW, improve reliability and resilience of the Long Island bulk power  
3 grid, and deliver energy, including renewable energy from offshore wind facilities, to load  
4 centers in Southeast New York. The Project will provide congestion relief on the Barrett-Valley  
5 Stream 138 kV path within Long Island by adding a new Barrett-East Garden City 345 kV line.  
6 The Propel NY Energy Project's potential economic benefits are estimated to be as high as \$3.6  
7 billion over 20 years and its substantial environmental benefits include up to 8 billion tons of  
8 carbon dioxide emissions avoided over a twenty-year period on a statewide basis.

9 **Q. PLEASE DESCRIBE THE RAINEY BREAKERS.**

10 A. As a designated project associated with the Propel NY Energy Project, Con Edison will build  
11 two breakers at the Rainey substation in Queens, New York. The scope of the Rainey Breakers  
12 project is to replace the existing 345 kV GE-HIT HVB362 open-air circuit breakers No. 1E and  
13 6E with two (2) 345 kV outdoor rated back-to back Gas Insulated Switchgear ("GIS"). The new  
14 breakers will be ABB 362PRM 4000 AMP GIS breakers with pre-insertion resistors configured  
15 with new GIS disconnect and ground switches. The project scope includes: (1) removal of the  
16 existing equipment; (2) civil, structural, and electrical bus modifications needed for the new  
17 breakers; (3) the new GIS equipment; and (4) upgrades to the Rainey Breakers' protection and  
18 control.

19 **Q. PLEASE DESCRIBE THE OWNERSHIP OF AND CONSTRUCTION**  
20 **RESPONSIBILITY FOR THE RAINEY BREAKERS.**

21 A. The Rainey Breakers will be engineered, procured, constructed, owned and operated by Con  
22 Edison.

**Q. WHICH ENTITY WILL OPERATE AND MAINTAIN THE BREAKERS?**

A. Con Edison will operate and maintain the breakers.

**IV. RISKS AND CHALLENGES OF THE PROPEL NY ENERGY PROJECT**

**Q. HAVE THE SPONSORS OF THE PROPEL NY ENERGY PROJECT IDENTIFIED THE RISKS ASSOCIATED WITH COMPLETING THE PROJECT?**

A. Yes.

**Q. WHERE DID THE SPONSORS OF THE PROPEL NY ENERGY PROJECT IDENTIFY THE RISKS ASSOCIATED WITH COMPLETING THE PROJECT?**

A. New York Transco LLC and New York Power Authority explained those risks in their transmittal letters in Docket Nos. EL23-96-000 and ER24-232-000.

**Q. WHAT ARE SOME OF THE RISKS THAT THE SPONSORS OF THE PROPEL NY ENERGY PROJECT IDENTIFIED THAT COULD IMPACT PROJECT COMPLETION?**

A. Among other things, the Propel NY Energy Project has identified the following areas of significant risk: federal and state permitting; parkland alienation (six specific locations noted); supply chain; bulk power outage availability; underground and subsea construction; and local ordinance risks. In addition to these risks, the Propel NY Energy Project sponsors appropriately identified the considerable challenges with constructing an entire subsurface electric transmission project in the heavily developed and congested areas of Long Island, New York City and Westchester County. As described in considerable detail in their respective filings, each of the risks could materially impact the Propel NY Energy Project sponsors' ability to complete the construction of the project.

**Q. WHAT HAS NEW YORK TRANSCO SAID ARE THE REGULATORY AND PERMITS NECESSARY FOR THE PROPEL NY ENERGY PROJECT?**

A. New York Transco LLC identified multiple regulatory and permitting approvals required for the successful completion of the Propel NY Energy Project. The initial list of potential permits New York Transco LLC submitted appears in Exhibit No. TRANSCO-202 (Long Island Offshore Wind Export PPTN, Propel New York Energy Solution, Appendix D, PNYE Preliminary Permit Matrix (May 31, 2023)) of its October 27, 2023, filing in Docket No. ER24-232-000. Some of the significant required permits include, among others, New York State’s Article VII process, New York City Revocable Consent, and the U.S. Army Corps of Engineer’s Jurisdictional Determination and Nationwide Permit #57.

**Q. WHAT ARE THE RISKS OF NOT OBTAINING THE IDENTIFIED REGULATORY OR PERMIT APPROVALS?**

A. Because the Propel NY Energy Project is a very complex and permit-dependent project, failure to obtain the required permits could result in extensive delays or potential cancellation of the project.

**Q. WHAT ARE THE OTHER RISKS TO THE RAINEY BREAKERS THAT ARE BEYOND THE CONTROL OF CON EDISON?**

A. The risks identified by the sponsors of the Propel NY Energy Project translate into significant financial risks for Con Edison in the completion of the Rainey Breakers. Propel NY Energy Project’s obligation to secure numerous federal, state, and local regulatory authorizations and permits – and the significant uncertainty associated therewith – present regulatory and environmental risks that can negatively impact financial stability, result in higher capital costs,

1 cause delays to project construction, lead to rescoping and redesigning components or potential  
2 cancellation of the project. Because the Rainey Breakers are a Designated Public Policy Project  
3 of the Propel NY Energy Project, a cancellation to the overall project due to the risks discussed  
4 will result in the cancellation of Con Edison's designated project. There are no separate New  
5 York State regulatory permits required for the Rainey Breakers themselves, although the Rainey  
6 Breakers are subject to New York City Department of Buildings permits.

7 **Q. WHAT IS THE BASIS FOR YOUR CLAIM THAT THE ABOVE RISKS TO THE**  
8 **RAINEY BREAKERS ARE BEYOND THE CONTROL OF CON EDISON?**

9 A. In addition to my experience in transmission development which forms the basis of my  
10 opinion, the Commission has also recognized in its Incentive Policy Statement that financial  
11 risks are associated with transmission investment (*Promoting Transmission Investment through*  
12 *Pricing Reform*, 141 FERC ¶ 61,129 (2012)).

13 **Q. ARE THERE OTHER TYPES OF CHALLENGES AND RISKS ASSOCIATED WITH**  
14 **DEVELOPMENT OF THE RAINEY BREAKERS?**

15 A. Yes. The construction of the Rainey Breakers presents significant risks and challenges as well.  
16 Costs for construction materials, specialized skilled labor, and specialized equipment remain  
17 high and subject to significant fluctuation due to supply chain issues and duties on imported  
18 goods. This uncertainty is exacerbated at a macro level by factors including: (i) geopolitical  
19 unrest, particularly in regions where materials and products used in the electricity sector are  
20 sourced; (ii) extreme weather events of increased frequency and intensity; (iii) intense  
21 competition for scarce resources both within the electric transmission industry and from  
22 industries like artificial intelligence with competing demand. These developmental hurdles are

1 likely to increase as Con Edison proceeds with development of the Rainey Breakers.

2 **V. ADVANCED TECHNOLOGIES**

3 **Q. WILL ADVANCED TECHNOLOGIES BE USED IN THE RAINEY BREAKERS?**

4 A. Although the Rainey Breakers project will use the latest GIS technology and it will be  
5 designed to maximize topology optimization, the project does not meet the U.S. Department of  
6 Energy definition of “Advanced Transmission Technologies.”

7 **VI. FEDERAL POWER ACT SECTION 205 FILING**


8 **Q. IF THE RAINEY BREAKERS ARE ABANDONED FOR REASONS BEYOND CON**  
9 **EDISON’S CONTROL, WILL CON EDISON MAKE A SECTION 205 FILING TO**  
10 **RECOVER THE ABANDONED PLANT FOR THESE FACILITIES?**

11 A. Yes. In accordance with Order No. 679, if abandonment occurs with respect to the Rainey  
12 Breakers, Con Edison will make a filing under section 205 of the Federal Power Act to  
13 demonstrate that the abandonment of such project was for reasons beyond its control and  
14 demonstrate that the costs for which recovery is sought were prudently incurred.

15 **VII. CONCLUSION**

16 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

17 A. Yes.

  
Bradford L. Winer

**EXHIBIT NO. CECONY-102**

**NYISO DESIGNATED ENTITY LETTER**



September 6, 2023

**By Electronic Delivery**

Deidre Altobell  
Chief Engineer System & Transmission Operations  
Consolidated Edison Company of New York, Inc.  
4 Irving Place  
New York, New York 10003

Bradford Winer  
Director, Transmission Project Development  
Consolidated Edison Company of New York, Inc.  
4 Irving Place  
New York, New York 10003

**Re: Next Steps for Propel NY Alternate Solution 5 (T051)**

Dear Ms. Altobell and Mr. Winer:

The New York Independent System Operator, Inc. (“NYISO”) congratulates Consolidated Edison Company of New York, Inc. (“Con Edison”) on its designation of a portion of the Propel NY - Alternate Solution 5 (“Project”), which the NYISO Board of Directors selected to address the Long Island Offshore Wind Export Public Policy Transmission Need (“Long Island PPTN”) in the NYISO’s Public Policy Transmission Planning Process. The Project benefits New York State’s electric consumers by enabling the delivery of environmentally desirable power required to meet state energy goals, while enhancing New York State’s already high standard of system reliability.

The NYISO looks forward to working with Con Edison in the development, construction, and operation of its Designated Public Policy Project,<sup>1</sup> which is a portion of the overall selected Project. The NYISO’s Open Access Transmission Tariff (“OATT”) establishes certain initial steps that a Designated Entity must take following the NYISO’s selection of the Project in the Public Policy Transmission Planning Process, including the following:

- Pursuant to Section 31.4.12.1 of the OATT, the NYISO hereby requests that Con Edison submit its Designated Public Policy Project to the appropriate governmental agency(ies) and/or authority(ies) to begin the necessary approval process to site, construct, and operate the Designated Public Policy Project.

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<sup>1</sup> For details of Con Edison’s Designated Public Policy Project, please refer to the final list of Designated Entities and associated projects, which is available on the [NYISO’s website](#).

- Section 31.4.13 of the OATT and Section 10 of the NYISO's Public Policy Transmission Planning Process Manual ("Manual") require the Designated Entity to submit a project status report to the NYISO on a quarterly basis with the first status report due by October 15, 2023. The NYISO will provide you a form to submit the status of your Designated Public Policy Project in time for your first submission, and all reports must be submitted electronically to [publicpolicyplanningmailbox@nyiso.com](mailto:publicpolicyplanningmailbox@nyiso.com). Starting with the fourth quarter of 2023, the reports must be submitted electronically 15 days prior to the close of each calendar quarter, or as otherwise requested by the NYISO. The applicable deadlines for the quarterly reports will be reflected in the milestone schedule of your development agreement.
- Con Edison should consult with the other Designated Entities for the Project to understand how the parties intend to have their individual Designated Public Policy Projects studied through the Transmission Interconnection Procedures under Attachment P of the OATT. Please refer to Sections 22.4.1 and 22.5.4.2 of the OATT for additional information.

The NYISO will coordinate with Con Edison to schedule a kick-off meeting in the coming weeks to discuss these and other initial steps in the implementation of the Project and Con Edison's specific Designated Public Policy Project. At that meeting, the NYISO will also discuss the tendering and negotiation of a development agreement for Con Edison's Designated Public Policy Project. In the meantime, please let me know if you have any questions or if my team or I can be of any assistance.

Sincerely,

/s/ Zachary G. Smith

Zachary G. Smith

Vice President, System & Resource Planning  
New York Independent System Operator, Inc.