

Attachment I

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

New York Independent System Operator, Inc.	)))))	Docket No. ER26-____-000
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AFFIDAVIT OF YACHI LIN

Ms. Yachi Lin declares:

1. I have personal knowledge of the facts and opinions herein and if called to testify could and would testify competently hereto.

I. Purpose of this Affidavit

2. I submit this affidavit in support of the NYISO's compliance filing submitted on June 29, 2026, in response to Order No. 1920. The purpose of this affidavit is to provide information regarding: (i) the NYISO's proposed timeframe for the new Long-Term Transmission Planning Process, (ii) the metrics and models that the NYISO will apply in the System & Resource Outlook ("Outlook"), (iii) the additional qualitative and quantitative selection metrics that the NYISO will apply to all, or a subset, of proposed Long-Term Transmission Projects in determining the more efficient or cost-effective transmission solution to an identified Long-Term Transmission Need, (iv) the NYISO's application of the Order No. 1920 requirements in the context of the sponsorship model, and (v) the NYISO's proposed retention of its Public Policy Transmission Planning Process ("Public Policy Process") and its use for addressing Interconnection-Related Transmission Needs.

II. Background and Introduction

3. My name is Yachi Lin. I am the Director, System Planning for the New York Independent System Operator ("NYISO"). My business address is 10 Krey Boulevard, Rensselaer, NY 12144.
4. I have held a Director position since August 2022. Prior to that, I was the Senior Manager of Transmission Planning for the NYISO since February 2017. I also have held other positions at the NYISO, including Manager of Reliability Planning, Lead Engineer of Grid Operations, and Senior Planning Engineer of Interconnection Projects since I joined the NYISO in May 2011. Prior to the NYISO, I held the position of Business Development Manager and Staff Consultant at Siemens PTI since 1999. I also received a Master of Engineering from the Rensselaer Polytechnic Institute.

5. I oversee the NYISO's long-term electric system planning activities, including forward-looking assessments, evaluations, and plans for the New York bulk power system. My responsibilities include planning for the reliable service of forecasted electric demand, evaluating transmission expansion opportunities to address transmission needs driven by Public Policy Requirements, and identifying potential economic opportunities under a range of future system conditions. Since 2017, I have been responsible for leading each cycle of the Economic Planning Process, as well as each competitive transmission solicitation and evaluation conducted by the NYISO as part of its Public Policy Process pursuant to its requirements adopted in response to FERC's Order No. 1000. I have direct knowledge of the time, effort, and costs it takes to perform transmission planning studies consistent with the scope and requirements of the NYISO's proposed Long-Term Transmission Planning Process. In addition, I have direct knowledge of and extensive experience concerning the performance of, and the use of applicable models and metrics for, the existing Outlook and the solicitation, evaluation, and selection of projects in the Public Policy Process.

III. NYISO's Proposed Timeframe for the Long-Term Transmission Planning Process

6. As detailed in its June 29, 2026, compliance filing, the NYISO proposes a timeframe of four years for its new Long-Term Transmission Planning Process, which time period runs from the NYISO's development of Long-Term Scenarios for the planning cycle to the NYISO Board of Directors' ("NYISO Board") determination to select (or not select) a transmission solution to address a Long-Term Transmission Need for that planning cycle. This time period includes: (i) up to one year and six months for the NYISO's performance of the Outlook, (ii) up to one hundred eighty days for the New York Public Service Commission ("NYPSC") to review the results of the Outlook, including the Catalog of Transmission Expansion Opportunities, and to identify any Long-Term Transmission Needs, and (iii) if a Long-Term Transmission Need is identified, up to two years for the NYISO's performance of the Long-Term Transmission Selection Process. The NYISO developed this four-year duration based on its extensive experience in administering its transmission planning processes in New York and in coordinating with the New York Department of Public Service ("NYDPS") concerning the timeframe for NYPSC action.
7. The NYISO proposes a scheduled duration of the Outlook component of up to one year and six months. This time period runs from the NYISO's development of Long-Term Scenarios to the NYISO Board's approval of the Outlook. The NYISO developed this time period based on its review of the work and timeframes required for prior Outlook cycles, its assessment of the additional work required to account for the new Order No. 1920-related requirements, and its required coordination with the NYDPS, stakeholders, and other interested entities in this process.
8. In particular, the NYISO has required approximately one year and one month for the performance of its prior Outlook studies (and for its Congestion Assessment and Resource Integration Study, which predated the Outlook study for its Economic Planning Process). As detailed in the NYISO's compliance filing letter, the NYISO proposes to

expand the scope of its existing Outlook to account for the directives of Order No. 1920. This includes addressing the order's directives concerning the development of Long-Term Scenarios, the Extreme Weather Sensitivity, and additional scenarios and sensitivities, identifying and applying the applicable models and metrics, and identifying, in coordination with NYDPS, Transmission Owners, and stakeholders potential transmission needs for inclusion in the Catalog of Transmission Expansion Opportunities that will form the basis for the identification of any Long-Term Transmission Needs. While the NYISO already performs certain of these responsibilities for purposes of its existing Outlook, it reasonably expects that it will require several additional months to account for the additional requirements and to enable its proposed coordination with state entities, Market Participants, stakeholders, and other interested parties that will ensure an open and transparent process. Further, this time period will also provide the NYISO with flexibility to enable it to align this process with parallel state processes and requirements. Finally, to facilitate performing the Outlook within this time period, the NYISO proposes to commence collecting the factors and data inputs required to develop Long-Term Scenarios from stakeholders, the NYDPS, and other interested parties prior to the start date of the planning cycle.

9. The NYISO then proposes to provide the NYPSC with a 180-day time period to review the Outlook, including the Catalog of Transmission Expansion Opportunities, and to identify any Long-Term Transmission Need(s) for which the NYISO must solicit and evaluate proposed solutions in that planning cycle. The NYISO developed this time period in consultation with the NYDPS and with reference to the related NYPSC role in identifying transmission needs for purposes of the NYISO's Public Policy Process. The 180 day duration is required as the NYPSC must comply with the timing requirements of New York's State Administrative Procedure Act and must assess the proposed transmission opportunities and consider and address any filed comments.
10. Finally, the NYISO proposes a scheduled duration of up to two years for its performance of the Long-Term Transmission Selection Process. If the NYPSC issues an order identifying one or more Long-Term Transmission Need(s), the Long-Term Transmission Selection Process would run from the start date of the process to the NYISO Board's approval of the Long-Term Transmission Planning Report, indicating its determination to select or not to select a Long-Term Transmission Project for that cycle. The NYISO developed this time period based on its review of the work and timeframe required for comparable work for its Public Policy Process, its assessment of the additional work required to account for the additional Order No. 1920 requirements, and its required coordination with the NYDPS, stakeholders, and other interested entities in this process.
11. In particular, the NYISO developed this timeframe based on its review of the work and timeframes for the similar solicitation, evaluation, and selection requirements in its Public Policy Process that it has conducted and completed for three prior Public Policy Transmission Needs. The duration of these processes from solicitation to Board selection have ranged from approximately one year and ten months to approximately two years and two months. The NYISO proposes a time period of up to two years to perform the comparable solicitation, evaluation, and selection process for its Long-Term Transmission Selection Process, including the additional evaluation requirements specific

to the long-term process, such as the application of the seven benefit metrics. Notably, unlike in regions that use a bid-based model that identify transmission projects and then subsequently solicit bids to develop such projects, the NYISO's two-year process uses a sponsorship model that provides for its one-time selection of the complete, consolidated transmission project, including the project design, developer, and cost estimate. The NYISO proposes certain process enhancements and efficiencies for its Long-Term Transmission Selection Process to facilitate achieving this timeframe. Most significantly, the NYISO proposes not to include in its Long-Term Transmission Selection Process the Viability and Sufficiency Assessment process step and related decision period included in its Public Policy Process for proposed transmission solutions. This process step adds additional time to the evaluation process that is not commensurate with the benefits of this viability and sufficiency analysis. Instead, the NYISO proposes with respect to Long-Term Transmission Projects to immediately begin its evaluation of the proposed transmission solutions and to assess their viability and sufficiency through the application of the selection metrics. The NYISO will continue to assess the viability and sufficiency of Other Long-Term Projects in parallel with the NYISO's application of the selection metrics to the proposed Long-Term Transmission Projects.

12. In addition, the NYISO proposes to perform an overlapping process by which it will commence its Long-Term Transmission Planning Process cycle and perform its Outlook on a recurring basis that commences approximately every three years. If a Long-Term Transmission Need is identified by the NYPSC for a planning cycle, the NYISO will conduct a Long-Term Transmission Selection Process for that planning cycle, which evaluation and selection process will be performed in parallel with the Outlook for the next planning cycle. The NYISO's proposed approach will facilitate a regular cadence for its performance of the Outlook that can be relied upon by state entities, stakeholders and other interested parties, enables the NYISO to update assumptions and identify transmission expansion opportunities on a more frequent basis, and provides for clear timing interactions with other NYISO transmission planning processes. In addition, the recurring timeframe enables the NYISO to align its Outlook process with parallel state planning processes.
13. For all of the reasons described above, the NYISO's proposed duration and approach for its Long-Term Transmission Planning Process was carefully developed based on its extensive experience performing transmission studies and is reasonable in light of the NYISO-specific circumstances and requirements.

IV. NYISO's Models and Metrics for Outlook

14. The NYISO proposes to establish in the Outlook requirements in its Open Access Transmission Tariff ("OATT") the models and metrics that it will use in the performance of the Outlook. In particular, the NYISO proposes to develop and use, as appropriate, production cost, capacity expansion, power flow, and other models for purposes of its analyses in the Outlook. In addition, the NYISO proposes to develop and use, as appropriate, the following metrics for assessing the New York State Transmission System and system conditions consistent with the requirements in its tariff and procedures:

production cost, transmission congestion, Location Based Marginal Price (“LBMP”), emissions, and energy deliverability. The NYISO may also use other metrics, including, but not limited to: load payments, generator payments, ancillary service costs, capacity costs, energy losses, energy curtailment, and unserved energy. The NYISO will consult with the NYDPS and stakeholders concerning the identification of the appropriate models and metrics for a particular planning cycle.

15. These categories of models and metrics are consistent with those that the NYISO currently develops and uses, as appropriate, for purposes of performing its Outlook process. The revised Outlook will serve as the transmission study for both the Long-Term Transmission Planning Process and Economic Planning Process, and it is reasonable to apply consistent models and metrics to those currently utilized in its existing Outlook process. These models and metrics are reasonable and appropriate tools for identifying potential transmission needs on the New York State Transmission System. The NYISO’s proposed tariff requirements establish flexibility, in consultation with NYDPS and stakeholders, for determining the appropriate models and metrics that will be used and applied for a given planning cycle.

V. NYISO’s Additional Qualitative and Quantitative Selection Metrics

16. As part of its Long-Term Transmission Selection Process, the NYISO proposes to apply qualitative and quantitative metrics to proposed Long-Term Transmission Projects in addition to the seven benefit metrics identified in Order No. 1920 for purposes of determining the more efficient or cost-effective transmission solution to an identified Long-Term Transmission Need. These metrics include (i) capital cost estimates; (ii) a qualitative and quantitative evaluation of any Cost Cap voluntarily submitted by Developer; (iii) the cost per MW ratio of the proposed project; (iv) the expandability, operability, and performance of the proposed project; (v) the extent to which the Developer has the property rights, or the ability to obtain the property rights, required to implement the project; (vi) potential issues associated with delay in constructing the project consistent with the major milestones schedule and the schedule for obtaining any permits and other certifications as required to timely meet the need; (vii) application of any criteria provided by the NYPSC with its identification of the Long-Term Transmission Need and performance of analysis requested by the NYPSC, to the extent compliance with such criteria and analysis are feasible; and (viii) additional metrics, including LBMP, emissions, impact on transfer limits, deliverability, and other metrics appropriate based on the Long-Term Transmission Need. As detailed in the compliance filing, the NYISO’s use and application of the additional metrics will be open and transparent.
17. These additional metrics are consistent with the selection metrics that the NYISO applies to proposed transmission solutions in its Public Policy Process for purposes of determining the more efficient or cost-effective transmission solution. They complement the seven benefits required by Order No. 1920 by accounting for additional benefits necessary to assess projects proposed under a sponsorship model and addressed in a

single selection process, including the costs, operability, and constructability of the proposed projects.

18. Finally, the NYISO proposes to apply the additional metrics to all or a subset of proposed projects. Based on the NYISO's evaluation of all of the proposed projects using the seven benefit metrics, it may reasonably conclude to apply the additional metrics to only a subset of those project proposals. For its prior selection processes in its Public Policy Process, the NYISO has established tiers of the project proposals based on their performance across metrics. This has enabled the NYISO to focus its additional analyses on those projects that warrant further, focused analysis to effectively distinguish top performing projects from each other and to determine a final ranking. This also ensures process efficiency and minimizes study time, cost, and resources. If the NYISO were required to apply all additional metrics to every project proposal or project variation, regardless of its performance, it would impede the NYISO's ability to complete the Long-Term Transmission Selection Process within two years.

VI. Application of Order No. 1920 Requirements in Context of Sponsorship Model

19. The NYISO uses a sponsorship model for purposes of the competitive transmission solicitation, evaluation, and selection of transmission solutions in its Comprehensive System Planning Process. Pursuant to this model, a developer is responsible for proposing the entirety of a transmission project, including, among other things, providing the transmission project design, the developer's qualifications, the estimated costs, and the construction plan. The developer must submit its entire project proposal at the start of the applicable solicitation, evaluation, and selection process, which proposal is not subject to modification during the process, to ensure that the competitive project proposals are evaluated on a level-playing field. Unlike in a bid-based model, the NYISO does not design proposed transmission projects or project components to address an identified transmission need or constraint. In addition, the NYISO does not supplement or modify developers' proposals, which would unfairly favor one or more projects in its evaluation. Consistent with its existing transmission planning processes, the NYISO proposes to use a sponsorship model for purposes of its Long-Term Transmission Planning Process. Based on the NYISO's experience, this model allows for the greatest potential for creative and innovative transmission solutions and also yields the best benefits for rate-payer investment.
20. The NYISO proposes to address the Order No. 1920 requirements concerning right-sizing, voluntary funding, and alternative transmission technologies within this sponsorship model framework. In particular, and as detailed in the compliance filing, the NYISO will provide a developer proposing a Long-Term Transmission Project with the opportunity to include with its project proposal Alternative Transmission Technologies (or an explanation of why it is not including such technologies), a Voluntary Funding Arrangement, and Right-Sized Replacement Transmission Facilities. The NYISO would then evaluate such project proposals using the same metrics and requirements as its evaluation of a proposed transmission project that has not elected to include such facilities or funding arrangements for purposes of the determination of the more efficient

or cost-effective transmission solution to address the Long-Term Transmission Need. This approach provides the developer with the flexibility to consider the benefits of including such facilities or funding arrangements when developing a project proposal that it believes will be more efficient or cost effective than other solutions for purposes of the competitive process. In addition, under this approach, the NYISO would not be required to modify project proposals or components or to modify the means by which they will be evaluated after projects have been submitted, which could favor certain projects over others in a competitive process.

VII. Retention of Public Policy Process and Use for Addressing Interconnection-Related Transmission Needs

21. As described in the compliance filing letter, the NYISO's Public Policy Process has been a successful mechanism for identifying and addressing transmission needs in New York since its implementation in 2014. The NYISO proposes to retain this process, which will provide the NYISO, NYPSC/NYDPS, stakeholders, and other interested parties in New York with an additional tool running on a recurring two-year timeframe to assess and address transmission needs in New York in concert with the other NYISO and state transmission planning processes. This process will not supplant, interfere with, or undermine the implementation of the new Long-Term Transmission Planning Process. Instead, the Public Policy Process establishes an additional mechanism for identifying and addressing transmission needs driven specifically by Public Policy Requirements. In the absence of this process, the NYISO will no longer have a mechanism for timely addressing transmission needs driven by Public Policy Requirements that may be identified outside of the requirements or the timeframes for identifying transmission needs of the Long-Term Transmission Planning Process. For example, the NYPSC is nearing the completion of the first planning cycle of its Coordinated Grid Planning Process, which may identify transmission needs for which the NYPSC would request in the near term the NYISO to solicit and evaluate proposed transmission solutions. Further, the NYISO proposes to revise its solicitation requirements for potential transmission needs in the Public Policy Process to primarily focus on transmission needs that may arise within 10 year, which will allow the Public Policy Process to work in tandem with the longer planning horizon for the new Long-Term Transmission Planning Process.
22. In addition, the NYISO's existing Public Policy Process is the best suited of its existing Order No. 1000 transmission planning process for incorporating the Order No. 1920 requirements concerning Interconnection-Related Transmission Needs. The NYISO's reliability and economic transmission planning processes include unique solicitation and evaluation requirements that are not well suited to addressing an Interconnection-Related Transmission Need. For example, the NYISO must identify a Responsible Transmission Owner to propose a transmission solution to address a Reliability Need and must consider and address backstop solutions to ensure reliability is addressed, which requirements would not be applicable to an Interconnection-Related Transmission Need. Further, the NYISO's Economic Planning Process provides for Load Serving Entities to assess and vote on the construction of any proposed regulated transmission projects based on specific criteria associated with economic transmission needs. Instead, the NYISO

proposes for the NYPSC to consider Interconnection-Related Transmission Needs identified by the NYISO for purposes of its determination of transmission needs in the Public Policy Process. This will enable the consideration and identification of regional transmission needs that efficiently cover a range of potential transmission needs, including multiple Interconnection-Related Transmission Needs, and for which transmission solutions would provide widespread benefits and the most efficient or cost-effective transmission solution. This approach also eliminates the need for the NYISO to have to administer multiple, overlapping solicitation and evaluation processes, which would be inefficient, constitute a scattershot approach for addressing transmission needs in New York, and limit the NYISO's ability to select the more efficient or cost-effective transmission solutions across multiple, potentially conflicting, transmission needs being assessed by the NYPSC.

23. This concludes my affidavit.

[Faint, illegible signature]

ATTESTATION

I am the witness identified in the foregoing affidavit. I have read the affidavit and am familiar with its contents. The facts set forth therein are true to the best of my knowledge, information, and belief.



Yachi Lin
June 29, 2026

Subscribed and sworn to before me
this 29th day of June 2026



Notary Public

Meghan Liguori
Notary Public, State of New York
No. 01LI6277544
Qualified in Albany County
Commission Expires March 11, 2029

My commission expires: 03/11/2029