

Attachment I

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

New York Independent System Operator, Inc., and) Docket No. ER14-2573-000
New York Transmission Owners)

**AFFIDAVIT OF
STEVEN L. COREY**

Mr. Steven L. Corey 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. The purpose of this Affidavit is to describe the New York Independent System Operator, Inc's ("NYISO's") performance of a trial run for completing a pre-application report for a Small Generating Facility and the anticipated time for the NYISO's administration of the pre-application process based upon this trial run.¹

II. Qualifications

3. My name is Steven Corey, and I am the Manager of Interconnection Projects for the NYISO. In this position I am responsible for overseeing the NYISO's administration of Interconnection Requests and the performance of all interconnection studies, including the administration of Interconnection Requests and the performance of interconnection studies for proposed Small Generator Facilities. In this capacity, I will be responsible for overseeing the NYISO's administration of customers' requests for a pre-application report and the completion of such reports.
4. I have held my current position for eight years and eleven months. Prior to my current position, I was Manager of Transmission Planning for the NYISO for six years. I was

¹ Capitalized terms not defined in this Affidavit shall have the meaning set forth in Attachment Z of the NYISO OATT, and if not therein, in Attachments X, S, or Section 1 of the OATT.

responsible for interconnection studies during that time as well. Prior to the NYISO, I was employed for nearly 26 years by the New York Power Pool, where, among other positions, I served as Manager of Transmission Planning before the transition to the NYISO. I received a Bachelor of Science degree in Electrical Engineering from Clarkson College of Technology (now Clarkson University) and a Master of Engineering degree in Electrical Engineering, also from Clarkson University.

III. Background

5. Order No. 792 directed the Transmission Provider, which in New York includes the NYISO and the New York Transmission Owners, to provide a potential customer/proponent of a Small Generating Facility, upon request, with a pre-application report that describes specific, readily available information about system conditions at a possible Point of Interconnection.

IV. Administration of the Pre-Application Report

6. To prepare for administering the new pre-application report process, NYISO Staff developed, with input from the New York Transmission Owners: (i) a Small Generating Facility Pre-Application Report Request Form (“Pre-Application Request Form”) consistent with the request form requirements set forth in Section 32.1.2.2 of Attachment Z of the NYISO’s Open Access Transmission Tariff (“OATT”), and (ii) a Small Generating Facility Pre-Application Report Form (“Pre-Application Report Form”) consistent with the report requirements set forth in Section 31.1.2.3 of Attachment Z of the OATT.
7. Using these standard forms, the NYISO and the New York Transmission Owners performed a trial run of completing the Pre-Application Report Form to evaluate the time and resources that will be required to complete the report.
8. To perform the trial run, the NYISO identified with the New York Transmission Owners the interconnection proposals for three Small Generating Facilities that had already been proposed and reviewed under the NYISO’s interconnection process. To obtain the most comprehensive results, the parties identified proposed interconnections of varying facility

sizes and at varying voltage levels. Specifically, the parties identified the following “test” projects for the trial run: (1) a 12.6 MW facility proposing to interconnect at 115 kV; (2) a 4.8 MW facility proposing to interconnect to distribution facilities (ultimately determined not to be subject to Commission jurisdiction or the NYISO’s Small Generator Interconnection Procedures); and (3) a 3.2 MW facility proposing to interconnect at 34.5 kV.

9. The NYISO administered the trial run for completing the Pre-Application Report Form for the first project – a 12.6 MW facility proposing to interconnect at 115 kV – because the NYISO possessed most of the readily available information for the proposed interconnection at the higher voltage level.
10. To perform the trial run, a NYISO Staff member, who works in my department under my management, filled out the Pre-Application Request Form, pulling data from the Interconnection Request initially provided for the proposed interconnection of the 12.6 MW Small Generating Facility.
11. Beginning with the completed Pre-Application Request Form, a second NYISO Staff member, who also works in my department under my management, set about compiling the readily available data required to complete the Pre-Application Report Form and inserting this data in the Pre-Application Report Form.
12. The second NYISO Staff member compiled data for the over twenty data points in the Pre-Application Report Form, drawing from assorted NYISO databases and materials – including: (i) the information in the Small Generating Facility Pre-Application Report Request Form; (ii) the relevant Connecting Transmission Owner’s one-line diagrams on file with the NYISO; (iii) the NYISO’s Annual Transmission Baseline Assessment, which is a study conducted by the NYISO in accordance with the requirements set forth in Attachment S of the NYISO OATT that identifies the System Upgrade Facilities that Transmission Owners are expected to need during the time period covered by the assessment to comply with Applicable Reliability Requirements, and reliably meet the load growth and changes in load pattern projected for the New York Control Area; and (iv) the Gold Book, which is an annual NYISO report that presents historic and forecast

load information, along with information regarding existing and proposed transmission and generation data.

13. The second NYISO Staff member spent approximately four (4) hours collecting data from these sources and filling out the Pre-Application Report Form.
14. Based on my experience, and the experience of those I manage, I would anticipate that the completion of a Pre-Application Report Form for a project that has not been previously studied by the NYISO would conservatively take an additional three (3) to four (4) hours to complete. The primary reason for this additional time is that in my experience and the experience of those that I manage, the Point of Interconnection for a proposed Small Generating Facility is usually ill-defined when a customer first contacts the NYISO and even upon its submission of a formal Small Generator Interconnection Request. The NYISO will not be able to identify the data required to complete the Pre-Application Report Form (which concerns system conditions at the Point of Interconnection), or identify the applicable Transmission Owner to which to route the Pre-Application Request Form, until it can clarify with the customer the proposed Point of Interconnection and identify the applicable Connecting Transmission Owner. It often takes much back and forth with the customer and the Connecting Transmission Owner to identify the specific POI and move the project forward in the interconnection process, including: (1) consulting available resources to determine the transmission district in which the POI is located (requiring the NYISO to examine the Transmission Owner service territory maps, which may not identify the POI if at certain low voltage levels, and may therefore require consultation with one or more Transmission Owners); (2) working with the customer and Connecting Transmission Owner(s) to clarify the point on the transmission system to which the facility proposes to interconnect; (3) working with the customer and Connecting Transmission Owner to determine whether the proposed interconnection is FERC jurisdictional and subject to the NYISO's Small Generator Interconnection Procedures.
15. In addition, and not reflected in my three (3) to four (4) hour estimate above, the NYISO will need to perform the administration tasks that were not included as part of the trial run,

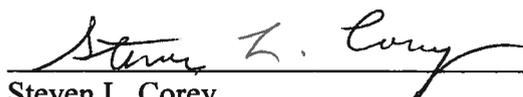
such as coordinating with the customer to ensure that the Small Generating Facility Pre-Application Report Request Form is complete and coordinating the completion of the Pre-Application Report Form with the relevant Connecting Transmission Owner(s).

16. Because the NYISO's trial run was conducted on a proposed interconnection that had already been reviewed by the NYISO, the NYISO had already addressed these open matters for the project and began its review from a Small Generating Facility Pre-Application Report Request Form that contained all of the relevant information. In addition, the NYISO completed the form itself and did not, in this instance, have to coordinate with the relevant Connecting Transmission Owner(s). For these reasons, the time that will normally be required to finalize a Small Generating Facility Pre-Application Report Form and to coordinate with the relevant Connecting Transmission Owner(s) was not accounted for in the four (4) hours that the NYISO Staff member required in the trial run to complete the sample Pre-Application Report Form. Based on my experience and the experience of those I manage, I conservatively estimate that it would take the NYISO and the New York Transmission Owners at least an additional three to four hours to complete a Pre-Application Report Form in the normal course.

This concludes my Affidavit.

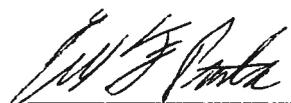
ATTESTATION

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.



Steven L. Corey

Subscribed and sworn to before me
this 21st day of October 2014



Notary Public

My commission expires: 02/12/2018

CARL F. PATKA
Notary Public - State of New York
No. 4962209
Qualified in Albany County
My Commission Expires Feb. 12, 2018