New York ISO
Independent System Operator

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January 10, 2022

By Electronic Delivery

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: New York Independent System Operator, Inc., Short-Term Reliability Process Informational Filing, Docket No. ER16-120-000

Dear Secretary Bose:

The New York Independent System Operator, Inc. ("NYISO") respectfully submits this informational filing identifying transmission solutions selected by the NYISO in 2021 to be built in response to Near-Term Reliability Needs for which the NYISO designated solely the Responsible Transmission Owner to propose a regulated solution pursuant to Section 38.3.6.3 of its Open Access Transmission Tariff ("OATT").[1]

I. List of Documents Submitted

The NYISO hereby submits the following document with this filing letter:

- Attachment A – Short-Term Reliability Process Solution Status List

II. Communications and Correspondence

All communications, pleadings, and orders with respect to this proceeding should be directed to the following individuals:

Robert E. Fernandez, Executive Vice President & General Counsel
Karen Georgenson Gach, Deputy General Counsel
*Carl F. Patka, Assistant General Counsel
Alex Schnell, Assistant General Counsel/Registered Corporate Counsel
Raymond Stalter, Director, Regulatory Affairs
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[1] Capitalized terms that are not otherwise defined in this filing shall have the meaning specified in Attachment X of the NYISO OATT and, if not defined therein, in Attachment S of the NYISO OATT and Section 1 of the NYISO OATT.

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III. Discussion

A. Background

The NYISO administers a Short-Term Reliability Process ("STRP") under its Open Access Transmission Tariff ("OATT") to evaluate and address certain reliability needs.[2] The first step in the STRP is the Short-Term Assessment of Reliability ("STAR"). STARs are performed quarterly to proactively address reliability needs that may arise within five years (Short-Term Reliability Needs)[3] due to various changes to the grid such as Generator deactivations, revised transmission plans, and updated load forecasts.[4] Transmission Owners also assess the impact of Generator deactivations on their local systems. A Short-Term Reliability Need that is observed within the first three years of the study period constitutes a "Near-Term Reliability Need."[5] Should a Near-Term Reliability Need be identified in a STAR, the NYISO solicits and selects the solution to address the need. The NYISO only requests regulated transmission solutions to a Near-Term Reliability Need from the Responsible Transmission Owner.[6] If a need arises beyond the first three years of the study period, the NYISO may choose to address the need within the STRP or, if time permits, through the long-term Reliability Planning Process.

The Commission approved the STRP in April 2020 with a May 1, 2020 effective date.[7] The NYISO issued its first quarterly Short-Term Assessment of Reliability ("STAR") on

[2] OATT § 38, Attachment FF.

[3] OATT § 38.1 contains the tariff definition of a "Short-Term Reliability Process Need."

[4] The STRP complements the NYISO's biennial Reliability Planning Process which consists of a Reliability Needs Assessment and a Comprehensive Reliability Plan to address Reliability Needs on the Bulk Power Transmission Facilities arising in years four through 10 of the 10-year Study Period. *See* OATT § 31.2.

[5] *See* OATT § 38.1 (definition of a "Near-Term Reliability Need"). *See also* OATT § 38.3.6.

[6] OATT §§ 38.1 (definition of a "Near-Term Reliability Need"), 38.3.6.2.2, 38.4.2.4.

[7] New York Independent System Operator, Inc., Docket No. ER20-1105-000, *Order Accepting Tariff Revisions*, 171 FERC ¶ 61,082 (April 30, 2020).

October 13, 2020 (2020 Quarter 3). The STAR found reliability needs in 2023-2025.[8] The NYISO solicited a regulated solution from Con Edison[9] as well as market-based solutions to the Near-Term Reliability Need in 2023.[10] The NYISO determined that the reliability needs arising in 2024-2025 would be addressed in the Reliability Planning Process.[11] The NYISO received two solutions to the 2023 need, one market-based solution and one regulated solution. For the market-based solution, NRG Berrians East Development LLC proposed its Astoria Replacement Project (NYISO Interconnection Queue #393), a 437 MW generator project located in Zone J. For the regulated solution, Con Edison proposed to revise certain series reactor statuses for the summer of 2023. The proposed commercial operation date of this project was June 2023.

The NYISO conducted a stakeholder review of its solutions selection process as provided by its tariff.[12] On February 22, 2021, the NYISO issued its Short-Term Reliability Process Report.[13] The NYISO determined that because certain required permits had not been obtained or progressed sufficiently, the proposed market-based generation project was not yet a viable solution to meet the Near-Term Reliability Need. The NYISO evaluated the viability and

[8] The Q3 2020 STAR Report is available at the following link: https://www.nyiso.com/documents/20142/16004172/2020-Q3-STAR-Report-vFinal.pdf/f836a71a-8fb7-dd24-2b6a-bfd0e739e2ec It stated:

> The NYISO observes Short-Term Reliability Needs on the BPTF starting in 2023 and increasing in scope and scale through 2025. The transmission security needs are driven primarily by forecasted increases in load and the unavailability of generation affected by the DEC Peaker Rule. The transmission security issues include thermal overloads and dynamic instability. For thermal loading, several 345 kV circuits in the Con Edison service territory are overloaded under N-1-1 and N-1-1-0 conditions beginning in year 2025. The specific violations are listed in Appendix A. The transmission security related Short-Term Reliability Needs observed beginning in 2023 are Near-Term Reliability Needs, solutions to which will be solicited, evaluated, and addressed in accordance with the STRP.

[9] The Q3 2020 STAR stated: "The needs arise within the Con Edison transmission district, therefore Con Edison is the Responsible Transmission Owner that is responsible for developing regulated solution(s)."

[10] The NYISO' solicitation letter is available at the following link: https://www.nyiso.com/documents/20142/15930765/STRP-Q3-2020-Solicitation-Letter-Final.pdf/1ada0222-908f-97cd-d552-ff44fd83875a Pursuant to OATT § 38.3.6.2.2, the NYISO posted a statement to the Electric System Planning Working Group regarding its decision to solicit a regulated solution solely from Con Edison for the Near-Term Reliability Needs in 2023. The statement is available at the following link: https://www.nyiso.com/documents/20142/16004185/2020Q3STAR-NearTermReliabilityNeedExplanatoryStatement-vFinal.pdf/8eca88f5-16b8-f118-b25d-505aa0fd482b

[11] Q3 STAR, at 3.

[12] In accordance with OATT Section 38.10.5, the NYISO: (i) posted its preliminary written determination of the STRP solution and presented it to stakeholders at the February 11, 2021 Electric System Planning Working Group/Transmission Planning Advisory ("ESPWG/TPAS") subcommittee meeting; (ii) responded to stakeholder questions and took stakeholder comments at the ESPWG/TPAS meeting and invited the submission of written comments by February 17, 2021; (iii) posted the written comments that it received on its website; and (vi) following its consideration of all comments submitted, posted the "Short-Term Reliability Process Report: 2023 Near-Term Reliability Need."

[13] The Short-Term Reliability Process Report is available at: https://www.nyiso.com/documents/20142/15930753/2020-Quarter-3-Short-Term-Reliability-Process-Report-vFinal3.pdf/df5f4ead-0bea-3b31-710b-5fdbe4649a57

sufficiency of the proposed Con Edison regulated transmission solution to change the operational statuses of certain series reactors on 345 kV cables in New York City and found that it satisfied the needs that arise in 2023. The report stated "In consideration of all proposed solutions, only the Con Edison proposal is deemed viable and sufficient to meet the Near-Term Reliability Needs. Therefore, the NYISO selects the Con Edison regulated transmission solution."[14]

No other BPTF reliability needs have been identified and addressed in the subsequent STARs completed to date. The 2021 Quarter 4 STAR commenced on October 15, 2021 and will be issued by January 13, 2022.

B. List of Solutions to Near-Term Reliability Needs for 2021

NYISO OATT Section 38.3.6.3 states that:

> The ISO shall maintain and post on its website a list of all transmission solutions selected by the ISO in prior years to be built in response to Near-Term Reliability Needs for which the ISO designated solely the Responsible Transmission Owner to propose a regulated Short-Term Reliability Process Solution. The list must include the Near-Term Reliability Need, the identity of the designated Responsible Transmission Owner, the transmission solution selected by the ISO, its in-service date, and the date on which the Responsible Transmission Owner energized or otherwise implemented the transmission solution. The ISO shall file the list with the Commission as an informational filing in January of each year covering the designations of the prior calendar year, if the ISO selected a Responsible Transmission Owner's regulated transmission solution to a Near-Term Reliability Need in the prior year.

As provided by the tariff, the NYISO posted the selected solution in a list on its website, and it is available at the following link: 72f02ac4-8c08-7105-3d36-fb51d9e58d53 (nyiso.com). The NYISO hereby submits the list including the solution to the Near-Term Reliability Need selected in 2021 to the Commission as an informational filing, as Attachment A to this filing.

IV. Service

The NYISO will send an electronic link to this filing to the official representative of each party to this proceeding, the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, a complete copy of the documents included with this filing will be posted on the NYISO's website at www.nyiso.com.

[14] Short-Term Reliability Process Report, at 7.

V. Conclusion

Wherefore, the NYISO respectfully requests that the Commission accept this informational filing that the NYISO submits to comply with Section 38.3.6.3 of Attachment FF to its OATT.

Respectfully submitted,

/s/ *Carl F. Patka*

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cc: Janel Burdick
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Attachment A
2021 Short-Term Reliability Process Solution Status List

New York ISO
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Short-Term Reliability Process Solution Status

OATT Section 38.3.6.3 states that, "the ISO shall maintain and post on its website a list of all transmission solutions selected by the ISO in prior years to be built in response to Near-Term Reliability Needs for which the ISO designated solely the Responsible Transmission Owner to propose a regulated Short-Term Reliability Process Solution. The list must include the Near-Term Reliability Need, the identity of the designated Responsible Transmission Owner, the transmission solution selected by the ISO, its in-service date, and the date on which the Responsible Transmission Owner energized or otherwise implemented the transmission solution." The table below provides the information required in OATT 38.3.6.3.

Near-Term Reliability Need	**Responsible Transmission Owner**	**Selected Transmission Solution**	**Planned In-Service Date**	**Date Energized/ Implemented**
Dynamic instability. The N-1-1 contingency combination resulting in N-1-1 BPTF stability criteria violations is the loss of Ravenswood 3 followed by Event UC11; a fault at Sprainbrook 345 kV and the loss of Sprainbrook - Tremont (X28) 345 kV and Buchanan - Sprainbrook (W93/W79) 345 kV. To address the violation, the necessary dynamic stability compensatory MVA as measured at the Farragut 345 kV and Astoria East 138 kV buses is 340 MVA.	Con Edison	The Con Edison solution includes a change in the planned status of existing series reactors to place the 71, 72, M51 and M52 series reactors in-service while by-passing the series reactors on the 41, 42, and Y49 transmission lines. No new or upgraded facilities are necessary to implement this solution.	Summer 2023	TBD

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OATT Section 38.10.5 states that "the ISO shall post on its website a list of all Developers that have undertaken a commitment to the ISO to build a project (which may be a regulated backstop solution, market-based response or alternative regulated response) that was selected as a Short-Term Reliability Process Solution." The table below provides the information required in OATT 38.10.5 along with the planned in-service date and the date on which the solution is energized/implemented.

Developers	**Selected Transmission Solution**	**Planned In-Service Date**	**Date Energized/Implemented**
Con Edison	The Con Edison solution includes a change in the planned status of existing series reactors to place the 71, 72, M51 and M52 series reactors in-service while by-passing the series reactors on the 41, 42, and Y49 transmission lines. No new or upgraded facilities are necessary to implement this solution.	Summer 2023	TBD

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 10th day of January 2022.

/s/ Joy A. Zimberlin

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