UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Interregional Transfer Capability Study: Strengthening Reliability Through the Energy Transformation Docket No. AD25-4-000

COMMENTS OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.

The New York Independent System Operator, Inc. ("NYISO") respectfully

)

)

)

submits comments in response to the Notice of Request for Comments in the above-captioned

proceeding issued by the Federal Energy Regulatory Commission ("Commission") on November

25, 2024 ("Notice").¹ These comments respond to the Interregional Transfer Capability Study

("ITCS" or "Study") prepared and submitted by the North American Electric Reliability

Corporation's ("NERC") at the direction of the U.S. Congress under the Fiscal Responsibility

Act of 2023. The Fiscal Responsibility Act required the ITCS to include:

- 1. Current total transfer capability between each pair of neighboring transmission planning regions;
- 2. A recommendation for prudent additions to total transfer capability between each pair of neighboring transmission planning regions that would demonstrably strengthen reliability within and among such neighboring transmission planning regions; and
- 3. Recommendations to meet and maintain total transfer capability together with such recommended prudent additions to total transfer capability between each pair of neighboring transmission planning regions.

To meet these objectives, the ITCS consists of three parts: (1) transfer capability analysis,

(2) recommendations for prudent additions to transfer capability, and (3) recommendations to

¹ Interregional Transfer Capability Study: Strengthening Reliability Through the Energy Transformation, *Notice of Request for Comments*, Docket No. AD25-4-000 (November 25, 2024).

meet and maintain transfer capability. The NYISO supports efforts, such as the NERC ITCS, that assess transmission transfer capability and overall system reliability and resilience. The NYISO engaged in the ITCS with the advisory group along other independent system operators/regional transmission organizations ("ISOs/RTOs"), planning coordinators, transmission planners, and other industry organizations.²

The NYISO's mission, among other critical aspects, is to ensure electric system reliability. Similar to FERC, NERC, and the industry at large, when planning the New York State Power System, the NYISO utilizes reliability criteria established by NERC along with the more stringent or specific criteria required by the Northeast Power Coordinating Council ("NPCC") and the New York State Reliability Council ("NYSRC"). With its focus on New York, and the northeastern U.S., the NYISO supports and reiterates the comments submitted by the Eastern Interconnection Planning Collaborative ("EIPC") and submits these comments for the Commission to consider.

I. Region-Specific Analysis is Necessary to Determine the Prudency of Interregional Transmission

A. Transfer Capability Analysis

New York has strong interregional transmission connections to PJM Interconnection, L.L.C. ("PJM"), ISO New England Inc. ("ISO-NE"), Ontario's Independent Electricity System Operator ("IESO"), and Hydro-Quebec ("HQ") that are leveraged to support the economic and reliable exchange of electric energy. New York is a historic importer of electric energy from PJM, IESO, and HQ, while it has typically exported to ISO-NE on a net-annual basis.³ Total

² NERC formed the ITCS advisory group for the purpose of ensuring adequate consultation with industry throughout the design and execution of the ITCS. The scope for the advisory group (<u>here</u>) and roster (<u>here</u>) were published on the NERC website.

³ Interregional transmission connections with neighboring regions and the economic exchange of electric energy between regions support electric system reliability in New York and throughout the region. For example, during

transfer capabilities ("TTC" or "transfer capability") between areas is a key input into studying the economic exchange of electric energy between regions and the energy adequacy analysis and supports regional and interregional electric system reliability. As such, the NYISO regularly studies TTC with its neighbors through NYISO-specific and interregional studies.

NERC's efforts to study the Bulk Power System and TTC between each pair of neighboring transmission planning regions in the ITCS could provide valuable information to the electric industry when considered with other studies and reports prepared by the entities responsible for regional planning and system operation. However, careful consideration of the specific regional and local system conditions, including internal and intra-regional system constraints,⁴ will be necessary to set an actionable path for future interregional grid expansion. The general assumptions broadly applied to all study regions, while necessary to perform a study such as the ITCS, may produce results and recommendations with limited actionable information, when reviewed in isolation.⁵ Different assumptions among various studies can significantly impact the resulting TTC values as well as the anticipated impacts to regional systems, *e.g.*, transmission facilities within the New York Control Area.

The NYISO performs various studies on a regular basis that evaluate transfer capability for the purpose of reliability, which were not leveraged by NERC in the ITCS. For instance, on

Winter Storm Elliot, the NYISO did not declare an Energy Emergency Alert ("EEA") during the storm event because a sufficient supply of generation and electricity imports were available to serve demand. "While there were unplanned BES generation outages in the NYISO footprint during the Event, NYISO did not need to enter into an energy emergency and was able to assist neighboring BAs during the Event." *See* Inquiry into Bulk-Power System Operations During December 2022 Winter Storm Elliot, FERC, NERC and Regional Entity Staff Report, October 2023 at p. 72.

⁴ For example, the Central East interface in New York is an internal New York interface that can constrain flows to neighboring areas within the greater NPCC region. *See infra* at pages 7 and 8 for more discussion interregional coordination.

⁵ See Comments of the Eastern Interconnection Planning Collaborative ("EIPC") submitted in this docket. The NYISO participates in the EIPC and supports and reiterates the EIPC comments submitted in this proceeding on the ITCS.

a seasonal basis, the NYISO performs seasonal transfer limit assessments for both summer and winter under both normal and emergency conditions and the limits are established utilizing a specific System Operating Limit ("SOL") methodology. The purpose of these seasonal assessments is to determine the TTC between the NYISO and adjacent areas for normal and emergency conditions in both summer and winter periods consistent with the SOL methodology.⁶ On an annual basis, the NYISO also performs more forward-looking transfer capability evaluations that include a five-year look ahead.⁷

Due to the differences in methodologies utilized within the ITCS relative to the NYISO's SOL methodology, the observed differences in transfer capability on an interregional interface can differ from a few hundred MW to several thousand MW.⁸ The NYISO also believes that utilizing emergency transfer limits⁹ is a more appropriate study approach when analyzing energy adequacy in studies like the ITCS due to the extreme nature of the weather being evaluated.¹⁰ In

⁶ The most recent summer study is available at <u>NYISO Operating Study Summer 2024</u> and the most recent winter study is available at <u>NYISO Operating Study Winter 2024-2025</u>. These studies determine TTC values between NYISO and adjacent areas, including IESO, PJM, and ISO-NE, for normal conditions in the summer/winter periods. TTC is calculated based on NERC TPL-001 category P1 and P2 contingencies and a set of selected category P4, P5, and P7 contingencies. TTC between NYISO and adjacent areas including IESO, PJM, and ISO-NE for emergency conditions in the summer /winter periods. TTC is also calculated for emergency conditions in the summer /winter periods.

⁷ The 2020 Comprehensive Area Transmission Review ("2020 CATR") of the New York State Bulk Power Transmission System (Study Year 2025) is available at <u>2020 CATR</u>. The 2020 CATR indicated that the planned Bulk Power Transmission Facilities ("BPTF"), as planned through year 2025, conform to the applicable NPCC Directory #1 and NYSRC Reliability Rules. The purpose of this assessment is to demonstrate conformance with the applicable NPCC Directory #1 and NYSRC Reliability Rules. The CATR is prepared in accordance with NPCC and NYSRC procedures for Area Transmission Reviews as well as NYISO guidelines and procedures. In the CATR the NYISO evaluates the BPTF, which include all of the facilities designated by the NYISO to be part of the BPS in accordance with NPCC and the NYSRC requirement and certain other non-BPS facilities.

⁸ See NYISO presentation to the NYSRC executive committee on January 15, 2025, at slides 9-11, available at <u>NYISO January Presentation</u>.

⁹ The NYISO relies on the NYSRC definition of emergency transfer limit - the maximum allowable transfer is calculated based on thermal, voltage, and stability testing, considering contingencies, ratings, and limits specified for emergency conditions.

¹⁰ The ITCS evaluated extreme weather but did not consider utilizing emergency transfer limits between areas. Emergency conditions are defined in the NYISO's Emergency Operations Manual as well as the various steps the NYISO takes to maintain system reliability and connections to neighboring regions under stressed conditions, such

consideration of only these differences in transfer limits between NYISO studies and the ITCS, the risks for New York may have been over-identified for the summer and under-identified for the winter.¹¹ However, the NYISO acknowledges that future generation plans are also critical to the identification of reliability issues, as discussed later in these comments.

The NYISO also collaborates with its regional neighbors, PJM, ISO-NE, and Canada¹² through its Northeastern ISO/RTO Planning Coordination Protocol ("Northeast Protocol").¹³ The Northeast Protocol includes the following requirements:

- Exchanging data and information,
- Coordinating interconnection requests and transmission requests with crossborder impacts,
- Developing a Northeastern Coordinated System Plan,¹⁴
- Performing planning studies through an open stakeholder process, and
- Allocating the costs associated with interregional projects having a crossborder impact consistent with each party's tariff and applicable federal regulatory policy.¹⁵

as, short-term emergency ratings, a more limited contingency set, use of special case resources, as well as other operator actions.

¹¹ The NYISO discusses reliability risks for New York over a similar 10-year horizon as the ITCS in the 2024 Reliability Needs Assessment (<u>here</u>).

¹² The NYISO coordinates planning efforts with three Canadian entities; Ontario's Independent Electricity System Operator ("IESO"), Hydro-Quebec ("HQ"), and New Brunswick Power.

¹³ The amended and restated Northeastern ISO/RTO Planning Coordination Protocol ("Northeast Protocol") can be accessed on the NYISO's website (<u>here</u>). IESO and HQ participate in the Northeast Protocol on a limited basis to share data and information.

¹⁴ See 2023 Northeastern Coordinated System Plan (May 28, 2024), available at <u>https://www.nyiso.com/documents/20142/1406358/2023-ncsp-pjm-nyiso-iso-ne-final.pdf/a4e1f295-7450-2eb0-f7f6-5747b390a44f</u>

¹⁵ See generally, Northeast Protocol.

Under the Northeast Protocol, the Joint ISO/RTO Planning Committee ("JIPC") was formed to address interregional transmission planning issues, including system needs and proposed system improvements that reflect, among other things, resource diversity, environmental compliance obligations, and resource retirements. This allows consideration of the impact of interconnections with neighboring systems, such as opportunities for the exchange of capacity and energy, and tie lines to facilitate access to a diversity of resources and potential economic opportunities for energy exchange.

The most recent Northeastern Coordinated System Plan ("NCSP"), NCSP23, documents planning activities during 2022 and 2023 under the provisions of the Northeast Protocol and other documents FERC accepted in response to the interregional requirements of its Order No. 1000. NCSP provides the clear actionable path to identify the interregional needs and solutions that comply with interregional cost allocation principles set by FERC.

NCSP23 builds on the interregional planning activities summarized in the 2021 Northeastern Coordinated System Plan, emphasizing interregional planning activities under the Northeast Protocol and summarizing several of the planning issues the three ISOs/RTOs are addressing. The key findings and conclusions of NCSP23 are as follows:

- Regional and interregional stakeholders provide the ISO/RTOs with key input for system planning activities through an open process.
- The ISO/RTO regional and interregional planning activities conducted during 2022 and 2023 reviewed regional needs and solutions and did not identify any need for new interregional transmission projects for cost allocation that would be more efficient or cost-effective in meeting the transmission system needs

6

of multiple regions than proposed regional system improvements included in the ISOs/RTOs' respective regional plans.

- Queue interconnection studies remain well coordinated across ISO/RTO boundaries, including studies of additional generating and transmission facilities that could affect interregional system performance.
- The ISOs/RTOs demonstrate compliance with all planning criteria and regulatory requirements.

As a specific example of the interregional coordination under JIPC, in March 2023, ISO-NE requested that the JIPC perform coordinated evaluations to determine the feasibility of raising the minimum loss of source value for New England from an existing level of 1,200 MW to a proposed level of 2,000 MW. On June 27, 2023, the NYISO, PJM, and ISO-NE responded to a separate, but related letter, dated June 16, 2023, from several states requesting assistance in developing a "Northeast States Collaborative on Interregional Transmission" to help "enhance system reliability and transition to a clean energy future more quickly and affordably."¹⁶ In the response, the NYISO, PJM, and ISO-NE declared that the three regions have "publicly committed to undertake an analysis of interregional transfer capability throughout the Eastern Connection" and also asked that "this work be coordinated with the other efforts . . . to ensure consistency and avoid duplicative efforts." The potential increase of the minimum loss of source value for New England from an existing level of 1,200 MW to a proposed level of 2,000 MW

¹⁶ See Joint Response Letter, dated June 27, 2023, available at

<u>https://www.nyiso.com/documents/20142/1402310/northeast-collaborative-doe-june-letters-combined-.pdf</u>. The joint response of ISO-NE, NYISO, and PJM was sent to Director Maria Robinson of the DOE's Grid Deployment Office and signed by officials from Connecticut, Maine, Massachusetts, New Jersey, New Hampshire, New York, Rhode Island, and Vermont.

could not only impact the future resources interconnecting to New England but also influence the design and performance of the wholesale markets in the neighboring regions.

Multiple national entities are investigating interregional transmission capability or projects. In addition to ITCS, the Department of Energy conducted a process to designate geographic areas as National Interest Electric Transmission Corridors where the development of new transmission would advance national interests, such as reliability and reduce consumer costs.¹⁷

The NYISO monitors and participates in these various national efforts,¹⁸ while at the same time, continuously studies the interaction of transfer capability on the borders with the New York State Power System within our own planning studies and those coordinated through the Northeastern Planning Protocol. While national efforts, such as the ITCS, provide useful information to the industry as a whole, the NYISO encourages the Commission to consider how the ISOs/RTOs and Planning Coordinators currently study transfer capability, including how the study periodicity and assumptions are set (which typically involves coordination and communication through robust stakeholder processes). The ISOs/RTOs and Planning Coordinators should retain the authority and responsibility to study and address issues that arise on a regional and interregional basis through their respective actionable processes.

The NYISO's robust planning processes are structured to identify the more efficient or cost-effective solutions to transmission needs and to collaborate with neighboring control areas regarding solutions that may serve interregional transmission needs. To the extent that increasing

¹⁷ See generally <u>https://www.energy.gov/gdo/articles/biden-harris-administration-announces-three-high-priority-areas-advancing-national.</u>

¹⁸ See NYISO comments to the U.S. Department of Energy, available at <u>https://www.nyiso.com/documents/20142/1402310/20240624-NYISOComments-NIETC.pdf/291f98ce-691e-662b-c146-65b64bb77e71</u>.

TTC may improve the efficient delivery of energy between neighboring regions, the NYISO's planning process is best suited to identify TTC changes and the impacts of any TTC changes to the New York State Transmission System. While the ITCS may provide useful data and broader context to inform transmission planners, operators, and investors, the entities that are responsible for planning and operating the system must continue to have the authority and flexibility to conduct actionable studies, determine needs, and identify solutions, consistent with established planning requirements and criteria.

B. Impact of Local Generation

A dramatic shift based on climate policies is changing how electricity is produced, stored, transmitted, and consumed in the regions. For instance, New York State laws, led by the Climate Leadership and Community Protection Act ("CLCPA") passed in 2019, are driving investment in renewable generation, storage, and transmission, while also driving adoption of electrification for transportation, residential, commercial, and industrial uses as an alternative to fossil fuel usage, resulting in increased electric demand. The CLCPA, and other New York State and local laws and policies, are also driving the deactivation or reduced operation of emitting generation (*i.e.*, largely fossil-fuel generators). The NYISO understands that neighboring regions are likewise working to address climate policies specific to their localities.

As each system independently pursues different climate policies, the availability of energy for interregional exchange will fundamentally change. In times of excess generation of solar, wind, and/or hydro production, New York has the potential to export renewable energy to adjoining markets to meet their regional demand. As neighboring systems approach full achievement of the various carbon-free policy mandates, the availability of excess generation for exchange will be highly dependent upon the generation types adopted and the conditions that

9

influence weather-dependent generation. Solar, land-based wind, and offshore wind production are relatively coincident across the NYISO and its neighboring systems.¹⁹ This, however, may limit the ability of neighboring systems to absorb excess energy from New York or vice-versa. Alternatively, when weather-driven renewable resource production is low in one system, it is probable that renewable production will also be relatively low in surrounding locations.

In consideration of the possible pathways to satisfy the objectives of the CLCPA,²⁰ the NYISO expects significantly more renewable generation capacity installed within New York than what was assumed in the ITCS. The ITCS does not give sufficient information as to the solar, wind, and other necessary conditions to give a full assessment of how these projected resource additions reported in the NYISO's 2023-2042 System and Resource Outlook ("Outlook") could impact the observed energy deficiencies. The purpose of adding transfer capability to enhance reliability and resiliency, especially during extreme weather, is to make more energy available for transfer under such conditions.²¹ Increasing transfer capability

¹⁹ *See* the NYISO's 2023-2042 System and Resource Outlook Appendix E for more details regarding New York renewable profiles and variability, available at <u>https://www.nyiso.com/documents/20142/46037616/Appendix-E-Renewable-Profiles-Variability.pdf/76833f16-ca0b-0439-6bae-e45eb75d88fe.</u>

²⁰ See NYISO presentation to the NYSRC executive committee on January 15, 2025, at slide 14, available at <u>NYISO</u> January Presentation. See also the NYISO's 2023-2042 System and Resource Outlook, July 23, 2024, at pages 42 to 47, available at <u>https://www.nyiso.com/documents/20142/46037414/2023-2042-System-Resource-Outlook.pdf/8fb9d37a-dfac-a1a8-8b3f-63fbf4ef6167</u>. When comparing the generation capacity assumed in the ITCS to key NYISO studies, such as the Outlook, there are significant differences. In consideration of the total generation, the ITCS assumes a value of about 53 GW while the Outlook study policy case achievement notes total generation values between 71 GW to 84 GW for a similar study year and demand level. At the same time, the ITCS does not provide sufficient information in the reported hours of deficiency to understand the weather conditions during these hours and how that translates to the expected generation output from renewable resources.

²¹ On February 21, 2025 FERC approved a new NERC reliability standard TPL-008 (here), which establishes transmission system planning performance requirements for extreme temperatures. When the transmission security analysis indicates the inability to meet the performance requirements, the Planning Coordinator is required to establish a corrective action plan to address the deficiency. NERC is also currently engaged in a project to address energy assurance. The project would enhance reliability by requiring Planning Coordinators to perform energy reliability assessments and to develop corrective action plans, operating plans, or other mitigation measures when necessary.

through upgrades to existing transmission facilities or building additional transmission is not a guarantee that the transfer capability will be available during the event, or that sufficient generation will be available to use the transfer capability. These factors must be balanced in consideration of any transmission upgrades.

The NYISO supports the recommendations from EIPC to balance the considerations of any transmission upgrades, including for the Commission to consider; (1) that each planning entity develop and document a methodology for calculating long-term transfer capability as an initial step when examining whether interregional transfer capability should be enhanced either between neighbors or interconnection-wide, and (2) the development of a 'metric' to help guide decisions on possible enhancements to interregional transfer capability. Further, the NYISO supports assigning these efforts to organizations such as the EIPC within the Eastern Interconnection.

II. Prudent Additions and Future Work that Must Rely on Studies by ISOs/RTOs, Transmission Planners, and Planning Coordinators

A. Prudent Additions of Transfer Capability

As required by the congressional directive, the ITCS includes recommended "prudent additions" to transfer capability. NERC defines "prudent additions" as potential transmission enhancements identified to mitigate grid reliability risks under especially challenging conditions. NERC also identifies that "prudent additions mitigate identified instances of energy deficiency without regard to economic considerations." FERC Order Nos. 1920 and 1920-A established the requirement that Transmission Providers must adopt a new Long-Term Regional Transmission Planning process to establish sufficiently long-term, forward-looking, and comprehensive transmission planning requirements. The ITCS definition of "prudence" is exceedingly limited in holistic system planning that aims to identify multi-value expansion opportunities, such as long-term economic and public policy benefits.

The ISOs/RTOs and Transmission Planners have existing processes to facilitate prudent additions that should continue to be applied to increasing TTC. Determining prudent additions for additional transfer capability should be informed not only by the ability to enhance system reliability, but also the cost of those enhancements, the ability to assign such costs to beneficiaries, and overall benefit/cost ratio versus other potential options, such as generation resource additions, demand side management, or implementation of operational measures. For the NYISO, and other northeastern entities, the Northeast Protocol and other existing reliability and interregional planning processes already facilitate the identification of prudent additions and will continue to do so in the adoption of FERC Order Nos. 1920 and 1920-A.

Specific to New York, the study recommends prudent additions for 3,700 MW of additional interregional transmission capability (1,800 MW increase with PJM and 1,900 MW with Quebec), even though the maximum deficiency is only projected to be over a limited period.²² The ITCS also neglects to account for the Champlain Hudson Power Express ("CHPE") HVDC tie with Hydro Quebec that is expected to enter service in 2026 and to facilitate delivery of 1,250 MW to New York City during summer conditions. With limited hours of deficiency identified and in consideration of the differences in transfer limits, assumed generation, and the study not including the planned CHPE project, the prudency of these interregional transmission needs may be over-identified.

²² In consideration of the ITCS results for planned year 2024 and 2033 and all evaluated weather years, the NERC ITCS identifies for New York a maximum deficiency in 2033 for weather year 2023 of a maximum resource deficiency of 3,729 MW, total resource deficiency of 31 GWh, and annual hours of resource deficiency of 15 hours.

B. Evaluating Transfer Capability Between "Neighbor's Neighbors"

The NYISO supports the further study of transfer capability between non-neighboring transmission planning regions, or "neighbor's neighbors," to capture additional reliability benefits and enhance the benefits of a geographically diverse portfolio of renewable generation energy production. However, such efforts must be undertaken consistent with existing planning processes and entered into voluntarily by the participating regions.

As a member of the EIPC, the NYISO participates in joint evaluations with planning authorities across the entire Eastern Interconnection, a region that includes 40 states and several Canadian provinces from the Rocky Mountains to the Atlantic Ocean, and from Canada south to the Gulf of Mexico. The EIPC is made up of 19-member electric system planning authorities and was the first organization to conduct interconnection-wide planning analysis across the eastern portion of North America. Also, as discussed above, the Northeast Protocol guides coordinated planning activities among the NYISO, ISO-NE, and PJM. Together, these current processes meet the Commission's defined goals for interregional transmission planning. The NYISO does not think that any actionable transfer capability modifications, additional interregional planning requirements, or cost allocation procedures are needed or appropriate in response to the ITCS.

The NYISO encourages the Commission to continue relying on existing interregional transmission planning processes. Planning rules should continue to require the consent of the regions, considering the input of their member states, utilities and stakeholders, for cost allocation of interregional transmission projects. The NYISO does not think that the Commission should adopt mandatory cost allocation of interregional transmission projects among the participating regions.

13

C. Probabilistic Resource Adequacy Analysis

The NYISO also supports future work to expand analyses, like the ITCS, to be fully probabilistic and to consider hundreds or even thousands of outage scenarios rather than just 12 weather years. However, the NYISO cautions the Commission and NERC that setting generation resource adequacy is governed by state commissions, and a number of reliability rules already establish assumptions and methodologies for resource adequacy analysis. The Commission's Reliability Explainer has noted that long-term resource planning, including deciding on what is a sufficient resource mix for a reliable electric system, typically falls under the jurisdiction of state or local public utility commissions.²³

Incorporating probabilistic resource adequacy analysis into future interregional or national studies could inform the industry through scenarios analysis but the regions are likely already required to follow different rules and regulations to satisfy resource adequacy.²⁴

²³ See generally Reliability Explainer | Federal Energy Regulatory Commission.

²⁴ See e.g., <u>NYSRC Reliability Rules</u> A.1, A.2, and A.3 and <u>NPCC Directory #1</u> criteria R4, R5, and R6. For instance, the established NYSRC reliability rules for resource adequacy include an annual look ahead to the next capability year (i.e., Rule A.3 R1) as well as a biennial assessment cover a ten-year look ahead period (*i.e.*, Rule A.3 R2). The NYSRC requires that all probabilistic resource capacity requirement analyzes conducted by the NYSRC and NYISO to meet the NYSRC resource adequacy criterion in R1.1. R1.1, NYSRC Resource Adequacy Criterion, available at <u>NYSRC Reliability Rules & Compliance Manual</u>. "The loss of load expectation (LOLE) of disconnecting firm load due to resource deficiencies shall be, on average, no more than 0.1 loss of load Event-Days per year. LOLE evaluations shall make due allowance for demand uncertainty, scheduled outages and deratings, forced outages and deratings, assistance over interconnections with neighboring control areas, NYS Transmission System emergency transfer capability, and capacity and/or load relief from available operating procedures. NPCC Directory #1 R4 provides similar criteria.

III. COMMUNICATIONS AND COORESPONDENCE

All communications and correspondence concerning these comments should be served as

follows:

Robert E. Fernandez, Executive Vice President, General Counsel & Chief Compliance Officer Karen G. Gach, Deputy General Counsel Raymond Stalter, Director, Regulatory Affairs *James H. Sweeney, Senior Attorney New York Independent System Operator, Inc. 10 Krey Boulevard Rensselaer, NY 12144 Tel: (518) 356-6000 Fax: (518) 356-7678 jsweeney@nyiso.com

* Person designated for receipt of service

IV. CONCLUSION

The NYISO respectfully requests that the Commission (i) consider these comments,

including the NYISO's support for the EIPC comments submitted in this proceeding, and

(ii) encourage ISOs/RTOs, transmission planners, and planning coordinators to consider the

ITCS report and continue the regional and interregional planning and coordination efforts that

are already in place.

Respectfully submitted,

<u>/s/ James H. Sweeney</u> James H. Sweeney Senior Attorney New York Independent System Operator, Inc. 10 Krey Boulevard Rensselaer, New York 12144 (518) 356-6000

Dated: February 25, 2025

cc: Janel Burdick Robert Fares Jignasa Gadani Jette Gebhart Leanne Khammal Jaime Knepper Kurt Longo David Morenoff Douglas Roe Eric Vandenberg Gary Will Adria Woods

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 25th day of February 2025.

/s/ Alexander Morse

Alexander Morse New York Independent System Operator, Inc. 10 Krey Blvd. Rensselaer, NY 12144 (518) 285-7826