ALLIANCE FOR CLEAN ENERGY NEW YORK, INC.

119 Washington Avenue, Suite 103
Albany, NY 12210
518.432.1405
info@aceny.org | www.aceny.org

DATE: December 8, 2022

TO: Mr. Jeffrey Maher & Mr. Bart Franey,
Transmission Owner Representatives to the NYS Public Service Commission
Coordinated Grid Planning Process

FROM: Alliance for Clean Energy New York

RE: Coordinated Grid Planning Process Proposal

As you well know, the New York Transmission Owners (TOs) filed an initial Coordinated Grid Planning Process (CGPP) proposal with the New York Public Service Commission (Commission) in compliance with Commission Orders in December 2021. The Commission staff has been facilitating stakeholder discussions and technical conferences on the CGPP. ACE NY has participated in the discussions, provided feedback, and appreciated the opportunity to do so.

The Commission asked the TOs to amend their CGPP proposal and re-file it by January 1, 2023. The purpose of this memo is to memorialize some of the feedback ACE NY provided during the discussions over the last several months for the TO's consideration as they amend the CGPP filing.

As recognized by the September 20221 Commission 0rder, "transmission planning is key to meeting the CLCPA goals;" "a properly coordinated planning process must identify upgrades at all levels needed to ensure the timely and cost-effective attainment of CLCPA policy goals;" and "must provide accurate and actionable information to market actors, policy makers, and other key stakeholders."

ACE NY offers the following comments in advance of the amended filing expected by January 1, 2023 from the TOs of a final design proposal of the CGPP.

- **Reduced Planning Cycle:** ACE NY reiterates the importance of the CGPP in the timely identification of key future transmission needs. Such process should not be overly protracted and should be finalized within a 2-year window at the most. ACE NY encourages the TOs to seek opportunities to reduce the planning cycle to 18 months. For instance, there could be opportunities for condensing the timelines for local assessments to 3 quarters from the proposed 4 quarters and condensing the stage 6 to less than a full quarter, as per the CGPP outline included in the November 18th CGPP Technical Conference presentation. ACE NY is

also pointing out that it is important that any CGPP-recommended upgrade from a prior cycle should be subject to a Commission order prior to stage 3 of a subsequent CGPP cycle. In this way, future planning cycles will include upgrades that the Commission approved in a prior cycle, which will lead to a more accurate representation of the system topology and a more realistic evaluation of the system needs not addressed up to the current cycle.

- Leveraging Existing Processes and Data: As acknowledged during the stakeholder discussions, a new coordinated transmission planning process should build upon existing processes and vetted data as part of existing transmission and distribution planning processes. ACE NY encourages utilities and the NYISO to detail what assumptions and models could be utilized in the CGPP such that the process optimizes the number of previously vetted inputs and models by NY stakeholders in other transmission related planning processes. It is also important that CGPP recognizes the complementarity between production cost modeling used in NYISO's transmission planning process and the powerflow-based modeling to be used in the CGPP process. For instance, if the NYISO's production cost modeling has identified generation pockets with significant curtailment risk, the local assessment in the CGPP should include these generation pockets for identification of grid upgrades.

- Renewable Generation/Capacity Expansion: One source of input commonly used for capacity expansion development is the NYISO interconnection queue. While this is a good starting point, the criteria should not unduly reduce the pool of projects considered. Evaluation should be more comprehensively based on the overall potential for clean energy development in each specific region. ACE NY encourages the TOs to solicit as much input as possible during the data collection phase such that the most realistic and up-to-date generation expansion intelligence is being used in building the capacity expansion plans. For instance, clean energy developers could be asked to submit, on a voluntary basis, information about areas of high clean energy development potential that can inform where renewable energy zones could be envisioned. Areas with more land availability and community support could provide opportunities for meeting the CLCPA goals in a more effective fashion by building the grid infrastructure required to optimize development opportunities across the state. There should also be a general goal of consistency between the TO and NYISO capacity expansion results or larger differences in assumptions or outcomes should be highlighted to ensure there is a feedback loop across all transmission planning processes.

- Solutions Development: As users of the transmission grid, ACE NY members are generally agnostic to which entity is responsible for or selected for developing and building a particular grid solution. It is important, however, that transmission solutions are properly sized and minimize cost impacts to ratepayers. For these objectives to be realized, ACE NY provides the following recommendations:

    - Bulk Solutions should be evaluated in parallel to any local solutions. During the technical conference held on November 18th, local utilities presented a new approach whereby at the beginning of stage 1, there will be some analysis using the capacity

expansion models to identify whether public policy needs should be considered inter-zone based on allowing increased bulk transfers. This is a good addition to the process given the importance of evaluating both local (low voltage) and bulk solutions. Further flexibility for consideration of bulk solutions can be allowed in the CGPP. For instance, the process should provide more flexibility for any bulk solution to be evaluated for any identified constraints in stage three, intra or inter-zone. The local TOs and/or other independent transmission companies should be allowed to propose and evaluate bulk solutions, or a combination of low-voltage and bulk solutions, for constraints identified within the CGPP. If bulk solutions cannot be proposed and evaluated outside the NYISO PPTN process, it is important that further streamlining of the NYISO PPTN or creation of a specific CGPP-path within the current PPTN process are being pursued such that bulk solutions can be identified and ultimately selected by stage five/year two of the CGPP.

- Consistency and Flexibility in Selection Criteria for Solutions: As highlighted in the September 2021 Order, flexibility in assessing benefits of a transmission solution should be allowed, while ensuring that a consistent set of benefits are being evaluated across all proposed solutions (*i.e.*, cost, renewable integration capabilities measured in MW/GW, etc.).

- Alternative Technologies: ACE NY recommends that alternative and grid enhancing technologies (GETs) like dynamic line ratings, topology optimization, advanced power flow controllers, and storage are being consistently evaluated for thermal or other violations that warrant such type of solutions. Indeed, this type of solutions can be very cost-effective or can be used as bridge solutions pending traditional upgrades. This has been recognized in the February 2022 Department of Energy study, *Grid-Enhancing Technologies: A Case Study on Ratepayer Impact*, which found that "*GETs can provide benefit in a future system heavily reliant upon variable renewable energy, particularly in bridging the gap between today's infrastructure and the grid needed to support ambitious climate goals.*"

- Transparency: ACE NY recommends that the CGPP provides transparency and access to the more detailed system data across different ranges of stakeholders under proper Critical Energy/Electric Infrastructure Information (CEII)) guidelines. ACE NY also recommends that a comment period be included in the process prior to any report with the CGPP findings and recommendations being finalized.

- Distribution Planning: There is an important interplay that needs to be acknowledged and evaluated as part of the CGPP between Distributed Energy Resource (DER) additions and utility-scale clean energy resource additions. The CGPP should be the avenue for improved local transmission and distribution planning such that development of DERs comes with appropriate grid expansions both at the distribution level but also downstream at the local level. The CGPP should evaluate the DER potential within each service territory especially where additional local constraints are being identified such that the DER impact is properly

evaluated when designing and sizing local upgrades. The coordination and interplay are more critical than in the past due to strong DER incentives and development, and the longer lead time for grid-scale clean energy resources and transmission upgrades. Absent appropriate planning at both the local and distribution levels, large scale clean energy resources can become stranded assets due to congestion and curtailment as the grid-scale resources are the ones being curtailed in the market if local system becomes constraining.

- Energy Policy Planning Advisory Council (EPPAC): ACE NY agrees with the proposed EPPAC model but also recommends that the CGPP design allows for the creation of sub-committees for topics that might require more in-depth stakeholder discussion and vetting, and a broader expert-based representation. ACE NY is also in strong agreement with the proposal that DPS staff mediate in the event there are more material differences of view across the EPPAC representatives, which might at times result in disagreements regarding inputs, scenarios and modeling results and recommendations.

Cc: Liz Grizaru, NY DPS