

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

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In the Matter of the Application :
of New York Regional Interconnect, :
Inc. for a Certificate of :
Environmental Compatibility and : Case 06-T-0650
Public Need Pursuant to Article :
VII of the New York Public Service :
Law. :
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New York Regional Interconnect, Inc.
NY PSC Case 06-T-0650
Central Hudson Gas & Electric Corporation
First Set of
Interrogatories to the NYISO (Mr. Corey)

- 1) Please confirm that the current NYISO practice is for the NYISO to make commitment and/or dispatch decisions without considering constraints on the Central Hudson underlying transmission system?
- 2) Please refer to your direct testimony page 12 lines 9 through 13.
 - a) Does this sentence mean that, once NYRI is operational, the NYISO will determine the safe level of output of the NYRI Project recognizing constraints on the Central Hudson underlying transmission system *simultaneously* with constraints on the NYISO secured system?
 - b) Is the identified sentence intended to describe all of the changes to current NYISO operations that the NYISO will undertake once NRYI becomes operational? If not, please identify all of the other changes.
- 3) Please refer to your response to Q2a.
 - a) If your response is in the affirmative, please identify the portion of the current NYISO tariffs that the NYISO relies upon to provide it with such authority?
 - b) Does the NYISO believe that any changes to its current tariffs will be required to address the operation of NYRI?
 - c) If so, please describe generally the required tariff changes?
 - d) If your response to Q2a is in the negative, please describe the sequence of steps that would be taken to insure

STATE OF NEW YORK
DEPT. OF PUBLIC SERVICE
DATE <u>3/31/99</u>
CASE NO. <u>06-T-0650</u>
EX <u>252</u>

consistency between NYISO and applicable Central Hudson operating procedures and practices.

- 4) Please refer to your response to Q2b.
 - a) If your response is in the negative, please identify the portion of the current NYISO tariffs that the NYISO relies upon to provide it with such authority?
 - b) Does the NYISO believe that any changes to its current tariffs will be required to address the operation of NYRI in relation to the additional changes?
 - c) If so, please describe generally the required tariff changes?
 - d) If your response is in the negative, please describe the sequence of steps that would be taken to insure consistency between NYISO and applicable Central Hudson operating procedures and practices in relation to the additional changes?

- 5) On page 35 of the NYRI SRIS the following statement appears:
For the CHG&E system, the results indicate that for the four levels of Danskammer generation studied the impact of NYRI is to increase pre-contingency and post-contingency loading, and may reduce CHG&E's operating flexibility to secure their system. For several circuits, the impact of NYRI is to increase loading by about 12%.
 - a) Please state your understanding of the meaning of the word "secure"?
 - b) Would you agree that the phrase "their system" refers to the underlying Central Hudson transmission system?
 - c) If, under current NYISO tariffs and practices, Central Hudson needed to commit and/or dispatch a generating unit at Danskammer out-of-merit to secure its underlying transmission system, to whom would the related incremental costs be allocated?
 - d) If, under current NYISO tariffs and practices, the NYISO needed to commit and/or dispatch a generating unit at Danskammer to secure the NYISO secured system, to whom would the related incremental costs be allocated?
 - e) For sub-parts d) and e) separately, do the presently-approved NYISO tariffs provide all authority required by the NYISO for such allocations?

Please provide your responses to the undersigned and to Mr. John Watzka, Central Hudson Gas & Electric Corporation, 284 South Avenue, Poughkeepsie New York 12601, jwatzka@cenhud.com

Response:

1. The current NYISO practice is to make commitment and/or dispatch decisions for transmission constraints involving the 345kV Central Hudson transmission system, including Central Hudson's 345/138kV transformers.

2(a)-(b) The NYISO objects to Interrogatory No. 2(a)-(b) as untimely under the ALJs' ruling of January 30, 2009, wherein the ALJs directed parties filing rebuttal testimony to serve all initial discovery requests pertaining to another party's direct testimony by February 9, 2009. The NYISO objects further on the ground that Interrogatory No. 2(a)-(b) does not seek factual information or substantiation of the basis of any statement in the identified direct testimony of Mr. Steven L. Corey, but, rather, calls for the NYISO to speculate upon future circumstances and conditions which are not now and cannot at this time be determined.

3(a)-(d) See Response to Interrogatory 2(a)-(b).

4(a)-(d) See Response to Interrogatory 2(a)-(b).

5(a) In this context, "secure" means to operate generation and other equipment in such a manner as to maintain pre-contingency and post-contingency flows on transmission facilities to within their respective pre-contingency and post-contingency ratings.

5(b) Yes.

5(c) The NYISO objects to Interrogatory No. 5(c) on the ground that it calls for the NYISO to speculate upon future circumstances and conditions which are not now and cannot at this time be determined.

5(d) See Response to Interrogatory 5(c)

5(e) See Response to Interrogatory 5(c)

