

To: secretary@dps.ny.gov

I John Fitzpatrick of Rhinebeck support the views expressed here for a reasonable approach, no towers destroying our scenic Hudson Valley and Clinton here in Upstate Dutchess County, New York: jfitzpatrick8@yahoo.com; 3 Village Green ,Rhinebeck, NY 12572

Feb. 20, 2014

To: secretary@dps.ny.gov

Subject: Honorable Kathleen Burgess, NYS Public Service Commission

Secretary-- message from Dutchess County Legislator Joel Tyner...

Date: Feb 19, 2014 4:37 PM

Hon. Kathleen H. Burgess
Secretary
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12233-1350

[Re: Case 13-E-0488-- In the Matter of Alternating Current Transmission Upgrades-- Comparative Proceeding]

Dear Ms. Burgess:

I was disturbed to learn recently of the New York "Independent" System Operator's skewed analysis of Boundless Energy's proposal, and I urge you to reject the NYISO analysis.

I've held literally fifteen public forums on this issue at Clinton Town Hall since early September, and both GOP Clinton Town Supervisor Ray Oberly, myself, and 500+ signed on to <http://www.hudsonvalley-cc.org/petition> in support of the Boundless Energy proposal-- as it is by far the least intrusive and least expensive of the four proposals now before the PSC, using the most cutting-edge, state-of-the-art technology-- compared with much more intrusive and costly proposals from NYTransco (Central Hudson/National Grid), NextEra, and North American Transmission

Corp).

Unlike the other three proposals that would literally destroy our communities, Boundless Energy's common-sense, engineer-driven solution solves the electricity/congestion bottleneck in our region without new towers or taking new right-of-way in Clinton, Milan, Pleasant Valley, and Columbia County.

It is my understanding that a screening of the four proposals was requested by NYSPSC Administrative Law Judge David Prestemon on Oct. 23rd last year. It was supposed to certify that all the proposals had at least 1,000 MW transfer north to south, and, if possible, assign a benefit-to-cost ratio to each project. It is not without significance that the NYISO is supported by the existing utilities and is actually paid through a fund collected by them. They have a relationship with people who work as closely with the NYISO as possible. The NYISO also asked the utilities (originally Niagara Mohawk, now National Grid) to do the obvious fix for the long existing and increasingly expensive "congestion" between Leeds and Pleasant Valley: put one more double 345 kV down the existing corridor. National Grid could not get a positive benefit-to-cost ratio the way they figured on doing it, and taking the new land and higher towers required, so they dragged their feet. The problem became the centerpiece, after trying to close Indian Point, for the Governor's Energy Highway. The NYISO expected solution was the utilities' same-old, same-old solution for the last decade (as opposed to Boundless Energy's innovative proposal)-- NYISO wants an entirely new line to "fix" it. Boundless Energy instead came up with an innovative, modern solution using the carbon-fiber wire and undergrounding for a short distance to go around the problem using mostly existing equipment and all in existing right of way. It is far cheaper, faster, and less environmentally intrusive, the real,

common-sense criteria for selecting the best solution for the system and the public, but this is somewhat disruptive to the traditional way of doing business in the utility world at this point. It will become, we believe, standard in the future. Please don't let the status quo win out here.

Furthermore, the screening technique used by the NYISO is not the one generally applied across the country, and not exactly what was modeled by Siemens. Siemens used the FERC 715 for 2018 year, as did the NYISO. However, across the country the N-1 criteria is the standard, where one bad event such as a tree falling on the best north-south line for us, occurs. There is then assumed to be a short period for "re-dispatch" or shutting down generators north of the failure, and cranking up those not going full blast south of the failure, in this case. Then a second disaster can be put in, for "N-1-1" with this re-dispatch in place. This N-1-1 is not a "go, no go" normally, but obviously considered a rare occurrence, yet a way of dealing with it needs to be identified. Here it is implied that the N-1-1 contingency has become the criteria to screen the projects. This automatically favors the traditional all new transmission line and ROW. This screening technique uses a very special case, with some other assumptions on the dispatch of generation that were not made fully known to all participants in the two page guidance given out in the Judge Prestemon's technical conference in November, and it actually strongly favors completely new lines. When you fix an existing line and make it much better, at less expense and damage as Boundless Energy did, the way this was done the N-1 takes out not only the new Boundless line from Leeds to Kingston, it takes out the existing 345 kV that was already there and replaced by Boundless

- a double whammy. It is a peculiar way to do a screening that strongly favors a completely new line, which may not really be needed. On top of all this, with the NYTransco project by National Grid, the NYISO somehow assumed that their new project would not be one of the best routes, as Boundless would, so they did not take it out as on N-1-1. So on the second test, Grid and the local utilities become automatically the winner of a comparison using this peculiar screening technique. On the first cut, N-1 alone, the dispatch of the generators they chose cause one of the many Next Era solutions to do best, although it still flunks N-1 for 1,000 MW(!).

This screening technique has little to do with the real world or the standard way of checking projects in their interconnection studies required for final approval. In the real requirements that FERC will find approval with, the N-1 contingency must be met, and the N-1-1 checked. Everyone of the four projects failed the way the NYISO did their N-1. So all must be changed in some way to meet the real requirement they will have to meet. This screening technique needs to be challenged by the public - it automatically takes out any dramatically superior solution as the first N-1, ensuring that such projects will always be scored lower and gradual mediocrity be the required way of improving the expensive system we have inherited. This makes no sense. But for now, since it is now clear what they are doing, Boundless Energy can add some additional improvements and still be far superior and still cheapest, building on our originally superior solution, even under this strange screening technique.

Siemens was so upset that they have been working all weekend

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using standard approach to the 715 FERC Case for 2018, and now,
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remain in effect for this proceeding, that Boundless Energy will
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Lastly, I strongly urge the NYS Public Service Commission to
strongly question the NYISO screening "technique", and how it
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As our friends from Hudson Valley Concerned Citizens note (see
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"Many new transmission lines projects are proposed for the
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The Response to Governor Cuomo's Energy Highway Initiative - to
supply New York City with much needed and lower cost electricity
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to possibly reverse the impending \$340 Million/yr FERC Capacity
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Rate hike in the Hudson Valley/NYC region - has produced four
proposals to build a major new transmission line.

ONLY ONE of the four projects could be rapidly permitted, and
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built with few or no intervenors, requiring less than 50 miles
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work to solve the problem - proving to NYSIO and FERC that the rate hike is not needed (see Senator Chuck Schumer's letter to FERC Chairman Jon Wellinghoff below)

Three would use traditional overhead lines that require new taller 'monster' towers and new land for right of way (ROW) incurring extravagant costs over hundreds of miles of congested ROW. These three proposals would be fought by all those Residents through whose property they must pass and whose property would be taken by Eminent Domain. Extending the period of Crippling Property values - which is already well underway - for many more years.

The fourth, from a group of non-traditional utility engineers, uses undergrounding and high tech cable to remain less expensive and avoid new towers or land taking, and becomes nearly storm proof - but presently has no political patron.

By using undergrounding in this project, they establish a precedent for all future transmission line projects in the State of New York.

But political recognition and apparent support may well have arrived indirectly from the highest level, from our Governor in his State of the State plan published January 8, where he explicitly recognized the advantages of the 4th approach, and called for exactly this type of solution:

"To help achieve the balance between providing for the state's electric needs and preserving the local community's quality of life, the State will expedite projects that would be built wholly within existing transmission corridors (i.e., projects that do not result in higher or wider transmission corridors) or buried along existing

State-owned rights of way such as waterways and highways . . .
This approach does not change the standard review and input process for any project that would require a wider right of way "envelope," taller towers or other expanded transmission corridors."

P. 63 "Building on Success" 2014 State of the State - Gov. Andrew Cuomo

Only one project now meets these goals in the published plans. It does not use the usual new towers or overhead lines, stays completely in existing right of ways, and drills under the Hudson without bottom disturbance. The Governor has clearly recognized its advantages and responded to the public's pleas.

We must work together across the Hudson Valley Region and New York City to let the Governor know that we appreciate his response and we take him at his word. His plan has a quiet disciple: Boundless Energy (<http://www.leadspathwest.com/interactive-map>) the small group of innovative Engineers who designed the underwater/underground Neptune line that was built in 2007 for \$660 M and now carries 20% of all of Long Island's power - safe under the sea bottom and never touched by Sandy!

We need to carry the message to the Governor that for now, we recognize that only the Boundless project is marching to his drumbeat, with 21st Century solutions!

THIS IS WHAT THE PEOPLE OF NEW YORK STATE WANT FROM THEIR LEADERSHIP IN NEW TRANSMISSION PROJECTS"

Crucial-- Boundless Energy's solution is the only one that could be completed in time to avoid the deadly "new capacity zone" ten-

percent
electricity rate hike proposed by FERC/NYISO-- and I know you
don't
want that to happen.

So please-- reject the other three proposals (along with NYISO's
latest "screening")-- and select Boundless Energy's proposal--
without further delay!

Thank you for your attention to this matter.

Yours,

Joel Tyner
Dutchess County Legislator
Clinton/Rhinebeck
<http://www.dutchessdemocracy.blogspot.com/>
845-453-2105

p.s. Josh Fox, Mark Ruffalo, Mark Jacobson/Stanford, and Anthony
Ingraffea/Robert Howarth/Cornell are right-- locally generated,
renewable power is truly the solution of solutions-- see
<http://www.thesolutionsproject.org/>-- sooner or later we're
going to
have to embrace this type of a win-win-win, green-jobs, cost-
saving,
clean-air, 100% fossil-fuel-free vision for NYS!

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A copy of Schumer's letter to FERC Chariman Jon Wellinghoff is
below:

Dear Chairman Wellinghoff,

I write to urge the Federal Regulatory Commission (FERC) to
delay the
New York Independent System Operator's (NYISO) proposed tariff
revisions to establish a new capacity zone (NCZ) until at least
2017.
As it stands, the NYISO plans to implement the NCS by May 1,
2014 to
coincide with the start of the 2014/2015 capability year. Though
the
stated purpose of this NCZ is to increase electricity prices as
a

means to attract more investment in power generation to address reliability constraints in the region, the capacity zone does not account for new transmission initiatives underway that form part of New York State's Energy Highway Blueprint that will address the deliverability constraint identified by NYISO. The State of New York's plan to build major transmission facilities by the summer of 2016 will have a material impact on bulk power capacity in the corridor has identified as congested and will eliminate the need for price increases for ratepayers that may be upwards of \$350 million per year.

FOR IMMEDIATE RELEASE: November 7, 2013

SCHUMER: FERC PLAN FOR REZONING HUDSON VALLEY POWER GRID WOULD UNFAIRLY HIKE RATES BEFORE IN- PROGRESS TRANSMISSION UPGRADES ARE FINISHED - SENATOR URGES FERC TO DELAY NEW ZONE AND RESULTING RATE HIKES UNTIL THREE ENERGY HIGHWAY INITIATIVES ARE COMPLETED

NYS "Energy Highway" Initiatives, Due For Completion In 2016, May Alleviate Power Constraints on Hudson Valley- Schumer joins PSC and Others to Urge Fed. Energy Regulation Commission to Delay New 'Capacity Zone' until Upgrades Can Be Quantified and Assessed

FERC's Proposed New Zone Would Raise Prices Between 6 and 15% for Ratepayers in the Hudson Valley, Cost Over \$350 Million Annually

Schumer to FERC: Changing the Power Grid Now is Jumping the Gun - Wait for Transmission Upgrades to Be Completed Before Making Any Zoning Changes

Today, U.S. Senator Charles E. Schumer urged the Federal Energy Regulatory Commission (FERC) to delay their order to implement a new capacity zone that covers a significant portion of the Hudson

Valley

power grid - a move which could result in a rate increase of between 6 and 15 percent for Hudson Valley ratepayers, or over \$350 million annually - until they can assess the impact of in-progress transmission upgrades. FERC and the New York State Independent System Operator (NYSIO), which operates the state power grid, have proposed a new capacity zone in the grid which includes Orange, Ulster, Rockland, and Sullivan Counties in an attempt to alleviate power constraints in the area by increasing prices to attract new power generation capacity.

Schumer today joined the NYS Public Service Commission (PSC) and the New York Power Authority (NYPA), among others, to call for a delay in the new zone until transmission upgrades recently approved as part of New York State's Energy Highway Project could be realized and assessed. Schumer explained that transmission projects approved by the PSC are set to be completed in 2016, and are projected to create upwards of 600 megawatts of power by moving energy more efficiently to the Hudson Valley and New York City. Schumer said that FERC's new zone would preliminarily jack-up the prices for ratepayers in advance of the completion of these projects that will help relieve the initial problem, and perhaps eliminate the need for a new zone.

"While we need to find better and more creative ways to alleviate the power constraints on the Hudson Valley and New York City, FERC's proposal for a new zone is jumping the gun - it would increase the burden on ratepayers before other efforts to solve the problem can be completed," said Schumer. "That's why I'm asking FERC to delay their implementation of a new capacity zone until at least 2017, when we

can properly assess the impact of in-progress transmission upgrades.

These upgrades may lead us to a solution that doesn't include a proposal that would, in the short-term, line the pockets of existing power generators without a substantive increase in power generation."

The FERC and NYISO order would create a new capacity zone in the power grid that stretches from New York City to Albany in an attempt to alleviate a transmission bottleneck. Currently, there is a surplus of cheaper power generated Upstate that does not reach energy-needy areas in the Hudson Valley and New York City in an efficient manner.

The new zone is designed to increase electricity prices to attract new power plants to the region; estimates by the New York Dept. of Public Service (NYDPS) put the annual increase of cost at \$350 million. Orange and Rockland Utilities customers may face a 6 to 10% increase in prices, residents in Central Hudson's area could see a 10% increase, and large industrial ratepayers could see as much as a 15% increase in energy prices. Schumer noted that although he supported finding new energy sources for Hudson Valley residents, he does not support doing so on the backs of ratepayers if, as in this case, other options exist to deliver the needed power more efficiently and cheaply. Schumer expressed concern these large rate hikes could have on small businesses and employers throughout the Hudson Valley. For many companies, such a large spike in energy costs could decrease job creation and expansion efforts at a time when the local economy is on the track for economic growth.

Furthermore, he pointed out that transmission upgrades proposed by the New York State Energy Highway program, which are approved by

the
PSC and set to go online in 2016, are specifically designed to
deliver power around the bottleneck to Hudson Valley customers.
One
such project is an \$11 million investment in transmission
upgrades
running from Central Hudson's Rock Tavern substation to Con
Edison's
Ramapo substation in Rockland County. Schumer explained that it
made
no sense to jack-up the rates on residents now, before such
efforts
could be completed.

Schumer argued that the current proposal would undermine
statewide
efforts to increase the efficiency of transmission and delivery
systems, and unfairly hike rates before any new power generation
could be achieved. Schumer said that, at the very least, in the
event
the new zone moves forward, rate hikes should be delayed or
phased-in. As it stands, Hudson Valley consumers would see
skyrocketing rates even before prospective energy developers
could
move-in and help increase power generation.

The new capacity zone is set to take effect in May of 2014, and
Schumer is seeking a delay until 2017 at minimum, or until the
transmission upgrades from the Energy Highway initiatives can be
properly assessed.

REUTERS:

<http://www.reuters.com/article/2013/09/26/utilities-newyork-ferc-idUSL2N0HM14K20130926>

New York seeks delay of costly FERC power capacity zone decision
Sept 26 Thu Sep 26, 2013 12:23pm EDT

(Reuters) - New York utility regulators and some of the state's
power
companies asked federal energy regulators to reverse a recent
decision that the New York parties say could increase electric
bills
in the Lower Hudson Valley by \$350 million a year.

The New York State Public Service Commission (PSC) and the state-owned New York Power Authority (NYPA) said in a press release on Wednesday that the proposed new capacity zone in the Lower Hudson Valley could result in the construction of unnecessary new power projects.

The PSC, NYPA and other New York utilities asked the U.S. Federal Energy Regulatory Commission (FERC) to reconsider its August decision allowing the state's power grid operator, the New York Independent System Operator (NYISO), to create a new capacity zone in the Lower Hudson Valley that includes New York City.

The NYISO has said it designed the new capacity zone to maintain system reliability and attract investments in new and existing generation and demand response resources.

In basic terms, capacity markets pay generators to help keep existing power plants in service and build new units in order to maintain system reliability. Demand response providers who agree to reduce power usage when needed can also participate in capacity markets.

The new zone will include the current NYISO zones G, H and I in the Lower Hudson Valley and zone J in New York City.

The PSC and NYPA said the state is already working on New York Governor Andrew Cuomo's so-called Energy Highway initiative to expand the state's transmission resources to bring more power from upstate New York to the Lower Hudson Valley and New York City area.

The PSC and NYPA said the Energy Highway could negate the need for FERC to offer financial incentives to build more power plants downstate.

"We strongly urged FERC to reconsider its decision to create a new capacity zone in New York, which it says is needed to build more power plants downstate to alleviate demand for electricity," PSC Chairwoman Audrey Zibelman said in the release.

"We are well aware of the downstate demand for electricity...However, in its decision, FERC did not take into consideration the ongoing initiatives included in the Governor's Energy Highway," Zibelman said.

The biggest power companies in New York include units of Consolidated Edison Inc, National Grid Plc, Iberdrola SA, Entergy Corp, TransCanada Corp and NRG Energy Inc.

COSTS TO RISE

The PSC said if FERC's plan goes into effect, typical residential customers in the Lower Hudson Valley could see monthly bill increases ranging from 5 percent to almost 10 percent, depending on the utility. The increases for industrial and commercial customers could be even higher, the PSC said.

"Creation of a permanent new capacity zone undermines the Governor's Energy Highway initiatives," Gil Quiniones, NYPA president and chief executive, said in the release.

"The Energy Highway pursues a long-term solution to deliver lower-cost, upstate power to the downstate area by reinforcing the transmission system, Quiniones said, noting the new capacity zone will "take money out of the pockets of ratepayers and result in a windfall of profits for existing power plant owners in the region."

The NYISO plans to implement the new zone by May 1, 2014. The PSC is

asking FERC to delay implementing its decision until 2017 and consider how the Energy Highway proposals will affect long-term power prices.

"Without such analysis, FERC cannot properly assess whether it is causing more harm than good, and whether consumers might end up paying hundreds of millions of dollars for unneeded power plants," the PSC and NYPA said.

Governor Cuomo proposed the Energy Highway initiative in January 2012 to rebuild the state's power system by adding up to 3,200 megawatts (MW) of generation and transmission capacity and clean power.

One megawatt can power about 1,000 New York homes. To: secretary@dps.ny.gov
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Lastly, I strongly urge the NYS Public Service Commission to strongly question the NYISO screening "technique", and how it favors the status-quo solutions of new lines and right of ways-- we should

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"Many new transmission lines projects are proposed for the Hudson Valley to allow upstate surplus electricity to be sent down state to New York City and Long Island. These transmission lines will blight the Hudson Valley for centuries to come. We must act now, and demand that new lines are placed UNDERGROUND or are installed on existing towers, setting the precedent for decades to come, preserving the beauty and health of the Hudson Valley, and meet the needs of New York City. Underground cables will greatly increase the reliability and security of electric service to New York City. For some additional cost now we gain exemplary protection from ice storms, hurricanes like Sandy, terrorist attacks and the extraordinary future savings of maintenance and emergency repairs.

The Response to Governor Cuomo's Energy Highway Initiative - to supply New York City with much needed and lower cost electricity

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Domain. Extending the period of Crippling Property values -
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The fourth, from a group of non-traditional utility engineers,
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undergrounding and high tech cable to remain less expensive and
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new towers or land taking, and becomes nearly storm proof - but
presently has no political patron.

By using undergrounding in this project, they establish a
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But political recognition and apparent support may well have
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"To help achieve the balance between providing for the state's electric needs and preserving the local community's quality of life, the State will expedite projects that would be built wholly within existing transmission corridors (i.e., projects that do not result in higher or wider transmission corridors) or buried along existing State-owned rights of way such as waterways and highways . . . This approach does not change the standard review and input process for any project that would require a wider right of way "envelope," taller towers or other expanded transmission corridors."

P. 63 "Building on Success" 2014 State of the State - Gov. Andrew Cuomo

Only one project now meets these goals in the published plans. It does not use the usual new towers or overhead lines, stays completely in existing right of ways, and drills under the Hudson without bottom disturbance. The Governor has clearly recognized its advantages and responded to the public's pleas.

We must work together across the Hudson Valley Region and New York City to let the Governor know that we appreciate his response and we take him at his word. His plan has a quiet disciple: Boundless Energy (<http://www.leedspathwest.com/interactive-map>) the small group of innovative Engineers who designed the underwater/underground Neptune line that was built in 2007 for \$660 M and now carries 20% of all of Long Island's power - safe under the sea bottom and never touched by Sandy!

We need to carry the message to the Governor that for now, we

recognize that only the Boundless project is marching to his drumbeat, with 21st Century solutions!

THIS IS WHAT THE PEOPLE OF NEW YORK STATE WANT FROM THEIR LEADERSHIP IN NEW TRANSMISSION PROJECTS"

Crucial-- Boundless Energy's solution is the only one that could be completed in time to avoid the deadly "new capacity zone" ten-percent electricity rate hike proposed by FERC/NYISO-- and I know you don't want that to happen.

So please-- reject the other three proposals (along with NYISO's latest "screening")-- and select Boundless Energy's proposal-- without further delay!

Thank you for your attention to this matter.

Yours,

Joel Tyner
Dutchess County Legislator
Clinton/Rhinebeck
<http://www.dutchessdemocracy.blogspot.com/>
845-453-2105

p.s. Josh Fox, Mark Ruffalo, Mark Jacobson/Stanford, and Anthony Ingraffea/Robert Howarth/Cornell are right-- locally generated, renewable power is truly the solution of solutions-- see <http://www.thesolutionsproject.org/>-- sooner or later we're going to have to embrace this type of a win-win-win, green-jobs, cost-saving, clean-air, 100% fossil-fuel-free vision for NYS!

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A copy of Schumer's letter to FERC Chariman Jon Wellinghoff is below:

Dear Chairman Wellinghoff,

I write to urge the Federal Regulatory Commission (FERC) to

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As it stands, the NYISO plans to implement the NCS by May 1,
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FOR IMMEDIATE RELEASE: November 7, 2013

SCHUMER: FERC PLAN FOR REZONING HUDSON VALLEY POWER GRID WOULD
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FINISHED - SENATOR URGES FERC TO DELAY NEW ZONE AND RESULTING
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FERC's Proposed New Zone Would Raise Prices Between 6 and 15%
for
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Schumer to FERC: Changing the Power Grid Now is Jumping the Gun

-

Wait for Transmission Upgrades to Be Completed Before Making Any Zoning Changes

Today, U.S. Senator Charles E. Schumer urged the Federal Energy Regulatory Commission (FERC) to delay their order to implement a new

capacity zone that covers a significant portion of the Hudson Valley

power grid - a move which could result in a rate increase of between

6 and 15 percent for Hudson Valley ratepayers, or over \$350 million

annually - until they can assess the impact of in-progress transmission upgrades. FERC and the New York State Independent System

Operator (NYSIO), which operates the state power grid, have proposed

a new capacity zone in the grid which includes Orange, Ulster, Rockland, and Sullivan Counties in an attempt to alleviate power constraints in the area by increasing prices to attract new power

generation capacity.

Schumer today joined the NYS Public Service Commission (PSC) and the

New York Power Authority (NYPA), among others, to call for a delay in

the new zone until transmission upgrades recently approved as part of

New York State's Energy Highway Project could be realized and assessed. Schumer explained that transmission projects approved by

the PSC are set to be completed in 2016, and are projected to create

upwards of 600 megawatts of power by moving energy more efficiently

to the Hudson Valley and New York City. Schumer said that FERC's new

zone would preliminarily jack-up the prices for ratepayers in advance

of the completion of these projects that will help relieve the initial problem, and perhaps eliminate the need for a new zone.

"While we need to find better and more creative ways to

alleviate the power constraints on the Hudson Valley and New York City, FERC's proposal for a new zone is jumping the gun - it would increase the burden on ratepayers before other efforts to solve the problem can be completed," said Schumer. "That's why I'm asking FERC to delay their implementation of a new capacity zone until at least 2017, when we can properly assess the impact of in-progress transmission upgrades. These upgrades may lead us to a solution that doesn't include a proposal that would, in the short-term, line the pockets of existing power generators without a substantive increase in power generation."

The FERC and NYISO order would create a new capacity zone in the power grid that stretches from New York City to Albany in an attempt to alleviate a transmission bottleneck. Currently, there is a surplus of cheaper power generated Upstate that does not reach energy-needy areas in the Hudson Valley and New York City in an efficient manner. The new zone is designed to increase electricity prices to attract new power plants to the region; estimates by the New York Dept. of Public Service (NYDPS) put the annual increase of cost at \$350 million. Orange and Rockland Utilities customers may face a 6 to 10% increase in prices, residents in Central Hudson's area could see a 10% increase, and large industrial ratepayers could see as much as a 15% increase in energy prices. Schumer noted that although he supported finding new energy sources for Hudson Valley residents, he does not support doing so on the backs of ratepayers if, as in this case, other options exist to deliver the needed power more efficiently and cheaply. Schumer expressed concern these large rate hikes could have on small businesses and employers throughout

the Hudson Valley. For many companies, such a large spike in energy costs could decrease job creation and expansion efforts at a time when the local economy is on the track for economic growth.

Furthermore, he pointed out that transmission upgrades proposed by the New York State Energy Highway program, which are approved by the PSC and set to go online in 2016, are specifically designed to deliver power around the bottleneck to Hudson Valley customers. One such project is an \$11 million investment in transmission upgrades running from Central Hudson's Rock Tavern substation to Con Edison's Ramapo substation in Rockland County. Schumer explained that it made no sense to jack-up the rates on residents now, before such efforts could be completed.

Schumer argued that the current proposal would undermine statewide efforts to increase the efficiency of transmission and delivery systems, and unfairly hike rates before any new power generation could be achieved. Schumer said that, at the very least, in the event the new zone moves forward, rate hikes should be delayed or phased-in. As it stands, Hudson Valley consumers would see skyrocketing rates even before prospective energy developers could move-in and help increase power generation.

The new capacity zone is set to take effect in May of 2014, and Schumer is seeking a delay until 2017 at minimum, or until the transmission upgrades from the Energy Highway initiatives can be properly assessed.

REUTERS:

<http://www.reuters.com/article/2013/09/26/utilities-newyork-ferc-idUSL2N0HM14K20130926>

New York seeks delay of costly FERC power capacity zone decision
Sept 26 Thu Sep 26, 2013 12:23pm EDT

(Reuters) - New York utility regulators and some of the state's power companies asked federal energy regulators to reverse a recent decision that the New York parties say could increase electric bills in the Lower Hudson Valley by \$350 million a year.

The New York State Public Service Commission (PSC) and the state-owned New York Power Authority (NYPA) said in a press release on Wednesday that the proposed new capacity zone in the Lower Hudson Valley could result in the construction of unnecessary new power projects.

The PSC, NYPA and other New York utilities asked the U.S. Federal Energy Regulatory Commission (FERC) to reconsider its August decision allowing the state's power grid operator, the New York Independent System Operator (NYISO), to create a new capacity zone in the Lower Hudson Valley that includes New York City.

The NYISO has said it designed the new capacity zone to maintain system reliability and attract investments in new and existing generation and demand response resources.

In basic terms, capacity markets pay generators to help keep existing power plants in service and build new units in order to maintain system reliability. Demand response providers who agree to reduce power usage when needed can also participate in capacity markets.

The new zone will include the current NYISO zones G, H and I in the Lower Hudson Valley and zone J in New York City.

The PSC and NYPA said the state is already working on New York Governor Andrew Cuomo's so-called Energy Highway initiative to

expand
the state's transmission resources to bring more power from
upstate
New York to the Lower Hudson Valley and New York City area.

The PSC and NYPA said the Energy Highway could negate the need
for
FERC to offer financial incentives to build more power plants
downstate.

"We strongly urged FERC to reconsider its decision to create a
new
capacity zone in New York, which it says is needed to build more
power plants downstate to alleviate demand for electricity," PSC
Chairwoman Audrey Zibelman said in the release.

"We are well aware of the downstate demand for
electricity...However,
in its decision, FERC did not take into consideration the
ongoing
initiatives included in the Governor's Energy Highway," Zibelman
said.

The biggest power companies in New York include units of
Consolidated
Edison Inc, National Grid Plc, Iberdrola SA, Entergy Corp,
TransCanada Corp and NRG Energy Inc.

COSTS TO RISE

The PSC said if FERC's plan goes into effect, typical
residential
customers in the Lower Hudson Valley could see monthly bill
increases
ranging from 5 percent to almost 10 percent, depending on the
utility. The increases for industrial and commercial customers
could
be even higher, the PSC said.

"Creation of a permanent new capacity zone undermines the
Governor's
Energy Highway initiatives," Gil Quiniones, NYPA president and
chief
executive, said in the release.

"The Energy Highway pursues a long-term solution to deliver
lower-cost, upstate power to the downstate area by reinforcing

the transmission system, Quiniones said, noting the new capacity zone will "take money out of the pockets of ratepayers and result in a windfall of profits for existing power plant owners in the region."

The NYISO plans to implement the new zone by May 1, 2014. The PSC is asking FERC to delay implementing its decision until 2017 and consider how the Energy Highway proposals will affect long-term power prices.

"Without such analysis, FERC cannot properly assess whether it is causing more harm than good, and whether consumers might end up paying hundreds of millions of dollars for unneeded power plants," the PSC and NYPA said.

Governor Cuomo proposed the Energy Highway initiative in January 2012 to rebuild the state's power system by adding up to 3,200 megawatts (MW) of generation and transmission capacity and clean power.

One megawatt can power about 1,000 New York homes. To: secretary@dps.ny.gov
Subject: Honorable Kathleen Burgess, NYS Public Service Commission
Secretary-- message from Dutchess County Legislator Joel Tyner...
Date: Feb 19, 2014 4:37 PM

Hon. Kathleen H. Burgess
Secretary
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12233-1350

[Re: Case 13-E-0488-- In the Matter of Alternating Current Transmission Upgrades-- Comparative Proceeding]

Dear Ms. Burgess:

I was disturbed to learn recently of the New York "Independent" System Operator's skewed analysis of Boundless Energy's proposal, and I urge you to reject the NYISO analysis.

I've held literally fifteen public forums on this issue at Clinton Town Hall since early September, and both GOP Clinton Town Supervisor Ray Oberly, myself, and 500+ signed on to <http://www.hudsonvalley-cc.org>/petition in support of the Boundless Energy proposal-- as it is by far the least intrusive and least expensive of the four proposals now before the PSC, using the most cutting-edge, state-of-the-art technology-- compared with much more intrusive and costly proposals from NYTransco (Central Hudson/National Grid), NextEra, and North American Transmission Corp).

Unlike the other three proposals that would literally destroy our communities, Boundless Energy's common-sense, engineer-driven solution solves the electricity/congestion bottleneck in our region without new towers or taking new right-of-way in Clinton, Milan, Pleasant Valley, and Columbia County.

It is my understanding that a screening of the four proposals was requested by NYSPSC Administrative Law Judge David Prestemon on Oct. 23rd last year. It was supposed to certify that all the proposals had at least 1,000 MW transfer north to south, and, if possible, assign a benefit-to-cost ratio to each project. It is not without significance that the NYISO is supported by the existing utilities and is actually paid through a fund collected by them. They have a relationship with people who work as closely with the NYISO as possible. The NYISO also asked the utilities (originally Niagara Mohawk, now National Grid) to do the obvious fix for the long existing and increasingly expensive "congestion" between Leeds

and Pleasant Valley: put one more double 345 kV down the existing corridor. National Grid could not get a positive benefit-to-cost ratio the way they figured on doing it, and taking the new land and higher towers required, so they dragged their feet. The problem became the centerpiece, after trying to close Indian Point, for the Governor's Energy Highway. The NYISO expected solution was the utilities' same-old, same-old solution for the last decade (as opposed to Boundless Energy's innovative proposal)-- NYISO wants an entirely new line to "fix" it. Boundless Energy instead came up with an innovative, modern solution using the carbon-fiber wire and undergrounding for a short distance to go around the problem using mostly existing equipment and all in existing right of way. It is far cheaper, faster, and less environmentally intrusive, the real, common-sense criteria for selecting the best solution for the system and the public, but this is somewhat disruptive to the traditional way of doing business in the utility world at this point. It will become, we believe, standard in the future. Please don't let the status quo win out here.

Furthermore, the screening technique used by the NYISO is not the one generally applied across the country, and not exactly what was modeled by Siemens. Siemens used the FERC 715 for 2018 year, as did the NYISO. However, across the country the N-1 criteria is the standard, where one bad event such as a tree falling on the best north-south line for us, occurs. There is then assumed to be a short period for "re-dispatch" or shutting down generators north of the failure, and cranking up those not going full blast south of the failure, in this case. Then a second disaster can be put in, for "N-1-1" with this re-dispatch in place. This N-1-1 is not a "go, no go" normally, but obviously considered a rare occurrence, yet a way of dealing with it needs to be identified. Here it is implied

that
the N-1-1 contingency has become the criteria to screen the
projects.
This automatically favors the traditional all new transmission
line
and ROW. This screening technique uses a very special case, with
some
other assumptions on the dispatch of generation that were not
made
fully known to all participants in the two page guidance given
out in
the Judge Prestemon's technical conference in November, and it
actually strongly favors completely new lines. When you fix an
existing line and make it much better, at less expense and
damage as
Boundless Energy did, the way this was done the N-1 takes out
not
only the new Boundless line from Leeds to Kingston, it takes out
the
existing 345 kV that was already there and replaced by Boundless
- a
double whammy. It is a peculiar way to do a screening that
strongly
favors a completely new line, which may not really be needed. On
top
of all this, with the NYTransco project by National Grid, the
NYISO
somehow assumed that their new project would not be one of the
best
routes, as Boundless would, so they did not take it out as on N-
1-1.
So on the second test, Grid and the local utilities become
automatically the winner of a comparison using this peculiar
screening technique. On the first cut, N-1 alone, the dispatch
of the
generators they chose cause one of the many Next Era solutions
to do
best, although it still flunks N-1 for 1,000 MW(!).

This screening technique has little to do with the real world or
the
standard way of checking projects in their interconnection
studies
required for final approval. In the real requirements that FERC
will
find approval with, the N-1 contingency must be met, and the N-
1-1

checked. Everyone of the four projects failed the way the NYISO did their N-1. So all must be changed in some way to meet the real requirement they will have to meet. This screening technique needs to be challenged by the public - it automatically takes out any dramatically superior solution as the first N-1, ensuring that such projects will always be scored lower and gradual mediocrity be the required way of improving the expensive system we have inherited. This makes no sense. But for now, since it is now clear what they are doing, Boundless Energy can add some additional improvements and still be far superior and still cheapest, building on our originally superior solution, even under this strange screening technique.

Siemens was so upset that they have been working all weekend almost around the clock, first to figure out what the NYISO actually did to come up with these results so different from what they had modeled using standard approach to the 715 FERC Case for 2018, and now, with the help of Boundless Energy's John Tompkins, how to fix it using our modern techniques and staying in the ROW's using the best available technology. Boundless Energy has already identified three ways of augmenting our solution, which can greatly improve the overall system and still remain the least expensive with no extra right of way or new towers. Siemens is working on these in Syracuse, and will soon be issuing a paper that will first explain the shocking results of the NYISO "screening" and secondly, if this technique is allowed to remain in effect for this proceeding, that Boundless Energy will still meet it better than anyone else, building on the basic project which is still the real world cheapest, fastest and less damaging

solution. The public will have to pay for the extra fix, but Boundless Energy will make it as valuable to the overall system as possible, with the least disruption as possible.

Lastly, I strongly urge the NYS Public Service Commission to strongly question the NYISO screening "technique", and how it favors the status-quo solutions of new lines and right of ways-- we should not be doing this any more until modern techniques as is proposed here have first been checked out as the best solution, least disruptive and least expensive. The present approach favors large utility traditional rate base solutions and makes modern equipment and innovation at a disadvantage. The NYS Public Service Commission must demand that, since every proposal failed the N-1, (National Grid failed the worst) under this strange protocol, Boundless Energy must be allowed to submit improvements, if the PSC chooses to go forward with this way of screening.

As our friends from Hudson Valley Concerned Citizens note (see <http://www.hudsonvalley-cc.org/>; also see <http://www.nomonsterpowerlines.com/> and <http://www.clintonunited.org/>):

"Many new transmission lines projects are proposed for the Hudson Valley to allow upstate surplus electricity to be sent down state to New York City and Long Island. These transmission lines will blight the Hudson Valley for centuries to come. We must act now, and demand that new lines are placed UNDERGROUND or are installed on existing towers, setting the precedent for decades to come, preserving the beauty and health of the Hudson Valley, and meet the needs of New York City. Underground cables will greatly increase the

reliability
and security of electric service to New York City. For some
additional cost now we gain exemplary protection from ice
storms,
hurricanes like Sandy, terrorist attacks and the extraordinary
future
savings of maintenance and emergency repairs.

The Response to Governor Cuomo's Energy Highway Initiative - to
supply New York City with much needed and lower cost electricity
and
to possibly reverse the impending \$340 Million/yr FERC Capacity
Zone
Rate hike in the Hudson Valley/NYC region - has produced four
proposals to build a major new transmission line.

ONLY ONE of the four projects could be rapidly permitted, and
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built with few or no intervenors, requiring less than 50 miles
of new
work to solve the problem - proving to NYSIO and FERC that the
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Three would use traditional overhead lines that require new
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Thank you for your attention to this matter.

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p.s. Josh Fox, Mark Ruffalo, Mark Jacobson/Stanford, and Anthony
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"While we need to find better and more creative ways to alleviate the power constraints on the Hudson Valley and New York City, FERC's proposal for a new zone is jumping the gun - it would increase the burden on ratepayers before other efforts to solve the problem can be completed," said Schumer. "That's why I'm asking FERC to delay their implementation of a new capacity zone until at least 2017, when we can properly assess the impact of in-progress transmission upgrades. These upgrades may lead us to a solution that doesn't include a proposal that would, in the short-term, line the pockets of existing power generators without a substantive increase in power generation."

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as a 15% increase in energy prices. Schumer noted that although he supported finding new energy sources for Hudson Valley residents, he does not support doing so on the backs of ratepayers if, as in this case, other options exist to deliver the needed power more efficiently and cheaply. Schumer expressed concern these large rate hikes could have on small businesses and employers throughout the Hudson Valley. For many companies, such a large spike in energy costs could decrease job creation and expansion efforts at a time when the local economy is on the track for economic growth.

Furthermore, he pointed out that transmission upgrades proposed by the New York State Energy Highway program, which are approved by the PSC and set to go online in 2016, are specifically designed to deliver power around the bottleneck to Hudson Valley customers. One such project is an \$11 million investment in transmission upgrades running from Central Hudson's Rock Tavern substation to Con Edison's Ramapo substation in Rockland County. Schumer explained that it made no sense to jack-up the rates on residents now, before such efforts could be completed.

Schumer argued that the current proposal would undermine statewide efforts to increase the efficiency of transmission and delivery systems, and unfairly hike rates before any new power generation could be achieved. Schumer said that, at the very least, in the event the new zone moves forward, rate hikes should be delayed or phased-in. As it stands, Hudson Valley consumers would see skyrocketing rates even before prospective energy developers could move-in and help increase power generation.

The new capacity zone is set to take effect in May of 2014, and

Schumer is seeking a delay until 2017 at minimum, or until the transmission upgrades from the Energy Highway initiatives can be properly assessed.

REUTERS:

<http://www.reuters.com/article/2013/09/26/utilities-newyork-ferc-idUSL2N0HM14K20130926>

New York seeks delay of costly FERC power capacity zone decision
Sept 26 Thu Sep 26, 2013 12:23pm EDT

(Reuters) - New York utility regulators and some of the state's power companies asked federal energy regulators to reverse a recent decision that the New York parties say could increase electric bills in the Lower Hudson Valley by \$350 million a year.

The New York State Public Service Commission (PSC) and the state-owned New York Power Authority (NYPA) said in a press release on Wednesday that the proposed new capacity zone in the Lower Hudson Valley could result in the construction of unnecessary new power projects.

The PSC, NYPA and other New York utilities asked the U.S. Federal Energy Regulatory Commission (FERC) to reconsider its August decision allowing the state's power grid operator, the New York Independent System Operator (NYISO), to create a new capacity zone in the Lower Hudson Valley that includes New York City.

The NYISO has said it designed the new capacity zone to maintain system reliability and attract investments in new and existing generation and demand response resources.

In basic terms, capacity markets pay generators to help keep existing power plants in service and build new units in order to maintain system reliability. Demand response providers who agree to

reduce power usage when needed can also participate in capacity markets.

The new zone will include the current NYISO zones G, H and I in the Lower Hudson Valley and zone J in New York City.

The PSC and NYPA said the state is already working on New York Governor Andrew Cuomo's so-called Energy Highway initiative to expand the state's transmission resources to bring more power from upstate New York to the Lower Hudson Valley and New York City area.

The PSC and NYPA said the Energy Highway could negate the need for FERC to offer financial incentives to build more power plants downstate.

"We strongly urged FERC to reconsider its decision to create a new capacity zone in New York, which it says is needed to build more power plants downstate to alleviate demand for electricity," PSC Chairwoman Audrey Zibelman said in the release.

"We are well aware of the downstate demand for electricity...However, in its decision, FERC did not take into consideration the ongoing initiatives included in the Governor's Energy Highway," Zibelman said.

The biggest power companies in New York include units of Consolidated Edison Inc, National Grid Plc, Iberdrola SA, Entergy Corp, TransCanada Corp and NRG Energy Inc.

COSTS TO RISE

The PSC said if FERC's plan goes into effect, typical residential customers in the Lower Hudson Valley could see monthly bill increases ranging from 5 percent to almost 10 percent, depending on the utility. The increases for industrial and commercial customers could

be even higher, the PSC said.

"Creation of a permanent new capacity zone undermines the Governor's Energy Highway initiatives," Gil Quiniones, NYPA president and chief executive, said in the release.

"The Energy Highway pursues a long-term solution to deliver lower-cost, upstate power to the downstate area by reinforcing the transmission system, Quiniones said, noting the new capacity zone will "take money out of the pockets of ratepayers and result in a windfall of profits for existing power plant owners in the region."

The NYISO plans to implement the new zone by May 1, 2014. The PSC is asking FERC to delay implementing its decision until 2017 and consider how the Energy Highway proposals will affect long-term power prices.

"Without such analysis, FERC cannot properly assess whether it is causing more harm than good, and whether consumers might end up paying hundreds of millions of dollars for unneeded power plants," the PSC and NYPA said.

Governor Cuomo proposed the Energy Highway initiative in January 2012 to rebuild the state's power system by adding up to 3,200 megawatts (MW) of generation and transmission capacity and clean power.

One megawatt can power about 1,000 New York homes. To: secretary@dps.ny.gov
Subject: Honorable Kathleen Burgess, NYS Public Service Commission
Secretary-- message from Dutchess County Legislator Joel Tyner...
Date: Feb 19, 2014 4:37 PM

Hon. Kathleen H. Burgess

Secretary
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12233-1350

[Re: Case 13-E-0488-- In the Matter of Alternating Current
Transmission Upgrades-- Comparative Proceeding]

Dear Ms. Burgess:

I was disturbed to learn recently of the New York "Independent"
System Operator's skewed analysis of Boundless Energy's
proposal, and
I urge you to reject the NYISO analysis.

I've held literally fifteen public forums on this issue at
Clinton
Town Hall since early September, and both GOP Clinton Town
Supervisor
Ray Oberly, myself, and 500+ signed on to
<http://www.hudsonvalley-cc.org/petition> in support of the
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expensive of the four proposals now before the PSC, using the
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cutting-edge, state-of-the-art technology-- compared with much
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intrusive and costly proposals from NYTransco (Central
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Unlike the other three proposals that would literally destroy
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communities, Boundless Energy's common-sense, engineer-driven
solution solves the electricity/congestion bottleneck in our
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without new towers or taking new right-of-way in Clinton, Milan,
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It is my understanding that a screening of the four proposals
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assign a benefit-to-cost ratio to each project. It is not without significance that the NYISO is supported by the existing utilities and is actually paid through a fund collected by them. They have a relationship with people who work as closely with the NYISO as possible. The NYISO also asked the utilities (originally Niagara Mohawk, now National Grid) to do the obvious fix for the long existing and increasingly expensive "congestion" between Leeds and Pleasant Valley: put one more double 345 kV down the existing corridor. National Grid could not get a positive benefit-to-cost ratio the way they figured on doing it, and taking the new land and higher towers required, so they dragged their feet. The problem became the centerpiece, after trying to close Indian Point, for the Governor's Energy Highway. The NYISO expected solution was the utilities' same-old, same-old solution for the last decade (as opposed to Boundless Energy's innovative proposal)-- NYISO wants an entirely new line to "fix" it. Boundless Energy instead came up with an innovative, modern solution using the carbon-fiber wire and undergrounding for a short distance to go around the problem using mostly existing equipment and all in existing right of way. It is far cheaper, faster, and less environmentally intrusive, the real, common-sense criteria for selecting the best solution for the system and the public, but this is somewhat disruptive to the traditional way of doing business in the utility world at this point. It will become, we believe, standard in the future. Please don't let the status quo win out here.

Furthermore, the screening technique used by the NYISO is not the one generally applied across the country, and not exactly what was modeled by Siemens. Siemens used the FERC 715 for 2018 year, as did the NYISO. However, across the country the N-1 criteria is the standard, where one bad event such as a tree falling on the best north-south line for us, occurs. There is then assumed to be a

short
period for "re-dispatch" or shutting down generators north of
the
failure, and cranking up those not going full blast south of the
failure, in this case. Then a second disaster can be put in, for
"N-1-1" with this re-dispatch in place. This N-1-1 is not a "go,
no
go" normally, but obviously considered a rare occurrence, yet a
way
of dealing with it needs to be identified. Here it is implied
that
the N-1-1 contingency has become the criteria to screen the
projects.
This automatically favors the traditional all new transmission
line
and ROW. This screening technique uses a very special case, with
some
other assumptions on the dispatch of generation that were not
made
fully known to all participants in the two page guidance given
out in
the Judge Prestemon's technical conference in November, and it
actually strongly favors completely new lines. When you fix an
existing line and make it much better, at less expense and
damage as
Boundless Energy did, the way this was done the N-1 takes out
not
only the new Boundless line from Leeds to Kingston, it takes out
the
existing 345 kV that was already there and replaced by Boundless
- a
double whammy. It is a peculiar way to do a screening that
strongly
favors a completely new line, which may not really be needed. On
top
of all this, with the NYTransco project by National Grid, the
NYISO
somehow assumed that their new project would not be one of the
best
routes, as Boundless would, so they did not take it out as on N-
1-1.
So on the second test, Grid and the local utilities become
automatically the winner of a comparison using this peculiar
screening technique. On the first cut, N-1 alone, the dispatch
of the
generators they chose cause one of the many Next Era solutions
to do

best, although it still flunks N-1 for 1,000 MW(!).

This screening technique has little to do with the real world or the standard way of checking projects in their interconnection studies required for final approval. In the real requirements that FERC will find approval with, the N-1 contingency must be met, and the N-1-1 checked. Everyone of the four projects failed the way the NYISO did their N-1. So all must be changed in some way to meet the real requirement they will have to meet. This screening technique needs to be challenged by the public - it automatically takes out any dramatically superior solution as the first N-1, ensuring that such projects will always be scored lower and gradual mediocrity be the required way of improving the expensive system we have inherited. This makes no sense. But for now, since it is now clear what they are doing, Boundless Energy can add some additional improvements and still be far superior and still cheapest, building on our originally superior solution, even under this strange screening technique.

Siemens was so upset that they have been working all weekend almost around the clock, first to figure out what the NYISO actually did to come up with these results so different from what they had modeled using standard approach to the 715 FERC Case for 2018, and now, with the help of Boundless Energy's John Tompkins, how to fix it using our modern techniques and staying in the ROW's using the best available technology. Boundless Energy has already identified three ways of augmenting our solution, which can greatly improve the overall system and still remain the least expensive with no extra right of way or

new towers. Siemens is working on these in Syracuse, and will soon be issuing a paper that will first explain the shocking results of the NYISO "screening" and secondly, if this technique is allowed to remain in effect for this proceeding, that Boundless Energy will still meet it better than anyone else, building on the basic project which is still the real world cheapest, fastest and less damaging solution. The public will have to pay for the extra fix, but Boundless Energy will make it as valuable to the overall system as possible, with the least disruption as possible.

Lastly, I strongly urge the NYS Public Service Commission to strongly question the NYISO screening "technique", and how it favors the status-quo solutions of new lines and right of ways-- we should not be doing this any more until modern techniques as is proposed here have first been checked out as the best solution, least disruptive and least expensive. The present approach favors large utility traditional rate base solutions and makes modern equipment and innovation at a disadvantage. The NYS Public Service Commission must demand that, since every proposal failed the N-1, (National Grid failed the worst) under this strange protocol, Boundless Energy must be allowed to submit improvements, if the PSC chooses to go forward with this way of screening.

As our friends from Hudson Valley Concerned Citizens note (see <http://www.hudsonvalley-cc.org/>; also see <http://www.nomonsterpowerlines.com/> and <http://www.clintonunited.org/>):

"Many new transmission lines projects are proposed for the Hudson Valley to allow upstate surplus electricity to be sent down state to New York City and Long Island. These transmission lines will

blight
the Hudson Valley for centuries to come. We must act now, and
demand
that new lines are placed UNDERGROUND or are installed on
existing
towers, setting the precedent for decades to come, preserving
the
beauty and health of the Hudson Valley, and meet the needs of
New
York City. Underground cables will greatly increase the
reliability
and security of electric service to New York City. For some
additional cost now we gain exemplary protection from ice
storms,
hurricanes like Sandy, terrorist attacks and the extraordinary
future
savings of maintenance and emergency repairs.

The Response to Governor Cuomo's Energy Highway Initiative - to
supply New York City with much needed and lower cost electricity
and
to possibly reverse the impending \$340 Million/yr FERC Capacity
Zone
Rate hike in the Hudson Valley/NYC region - has produced four
proposals to build a major new transmission line.

ONLY ONE of the four projects could be rapidly permitted, and
quickly
built with few or no intervenors, requiring less than 50 miles
of new
work to solve the problem - proving to NYSIO and FERC that the
rate
hike is not needed (see Senator Chuck Schumer's letter to FERC
Chairman Jon Wellinghoff below)

Three would use traditional overhead lines that require new
taller
'monster' towers and new land for right of way (ROW) incurring
extravagant costs over hundreds of miles of congested ROW. These
three proposals would be fought by all those Residents through
whose
property they must pass and whose property would be taken by
Eminent
Domain. Extending the period of Crippling Property values -
which is
already well underway - for many more years.

The fourth, from a group of non-traditional utility engineers, uses undergrounding and high tech cable to remain less expensive and avoid new towers or land taking, and becomes nearly storm proof - but presently has no political patron.

By using undergrounding in this project, they establish a precedent for all future transmission line projects in the State of New York.

But political recognition and apparent support may well have arrived indirectly from the highest level, from our Governor in his State of the State plan published January 8, where he explicitly recognized the advantages of the 4th approach, and called for exactly this type of solution:

"To help achieve the balance between providing for the state's electric needs and preserving the local community's quality of life, the State will expedite projects that would be built wholly within existing transmission corridors (i.e., projects that do not result in higher or wider transmission corridors) or buried along existing State-owned rights of way such as waterways and highways . . . This approach does not change the standard review and input process for any project that would require a wider right of way "envelope," taller towers or other expanded transmission corridors."

P. 63 "Building on Success" 2014 State of the State - Gov. Andrew Cuomo

Only one project now meets these goals in the published plans. It does not use the usual new towers or overhead lines, stays completely in existing right of ways, and drills under the Hudson without bottom disturbance. The Governor has clearly recognized its advantages

and
responded to the public's pleas.

We must work together across the Hudson Valley Region and New York City to let the Governor know that we appreciate his response and we take him at his word. His plan has a quiet disciple: Boundless Energy (<http://www.leedspathwest.com/interactive-map>) the small group of innovative Engineers who designed the underwater/underground Neptune line that was built in 2007 for \$660 M and now carries 20% of all of Long Island's power - safe under the sea bottom and never touched by Sandy!

We need to carry the message to the Governor that for now, we recognize that only the Boundless project is marching to his drumbeat, with 21st Century solutions!

THIS IS WHAT THE PEOPLE OF NEW YORK STATE WANT FROM THEIR LEADERSHIP IN NEW TRANSMISSION PROJECTS"

Crucial-- Boundless Energy's solution is the only one that could be completed in time to avoid the deadly "new capacity zone" ten-percent electricity rate hike proposed by FERC/NYISO-- and I know you don't want that to happen.

So please-- reject the other three proposals (along with NYISO's latest "screening")-- and select Boundless Energy's proposal-- without further delay!

Thank you for your attention to this matter.

Yours,

Joel Tyner
Dutchess County Legislator
Clinton/Rhinebeck
<http://www.dutchessdemocracy.blogspot.com/>

845-453-2105

p.s. Josh Fox, Mark Ruffalo, Mark Jacobson/Stanford, and Anthony Ingraffea/Robert Howarth/Cornell are right-- locally generated, renewable power is truly the solution of solutions-- see <http://www.thesolutionsproject.org/>-- sooner or later we're going to have to embrace this type of a win-win-win, green-jobs, cost-saving, clean-air, 100% fossil-fuel-free vision for NYS!

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A copy of Schumer's letter to FERC Chariman Jon Wellinghoff is below:

Dear Chairman Wellinghoff,

I write to urge the Federal Regulatory Commission (FERC) to delay the New York Independent System Operator's (NYISO) proposed tariff revisions to establish a new capacity zone (NCZ) until at least 2017. As it stands, the NYISO plans to implement the NCS by May 1, 2014 to coincide with the start of the 2014/2015 capability year. Though the stated purpose of this NCZ is to increase electricity prices as a means to attract more investment in power generation to address reliability constraints in the region, the capacity zone does not account for new transmission initiatives underway that form part of New York State's Energy Highway Blueprint that will address the deliverability constraint identified by NYISO. The State of New York's plan to build major transmission facilities by the summer of 2016 will have a material impact on bulk power capacity in the corridor has identified as congested and will eliminate the need for price increases for ratepayers that may be upwards of \$350 million per year.

FOR IMMEDIATE RELEASE: November 7, 2013

SCHUMER: FERC PLAN FOR REZONING HUDSON VALLEY POWER GRID WOULD UNFAIRLY HIKE RATES BEFORE IN- PROGRESS TRANSMISSION UPGRADES ARE FINISHED - SENATOR URGES FERC TO DELAY NEW ZONE AND RESULTING RATE HIKES UNTIL THREE ENERGY HIGHWAY INITIATIVES ARE COMPLETED

NYS "Energy Highway" Initiatives, Due For Completion In 2016, May Alleviate Power Constraints on Hudson Valley- Schumer joins PSC and Others to Urge Fed. Energy Regulation Commission to Delay New 'Capacity Zone' until Upgrades Can Be Quantified and Assessed

FERC's Proposed New Zone Would Raise Prices Between 6 and 15% for Ratepayers in the Hudson Valley, Cost Over \$350 Million Annually

Schumer to FERC: Changing the Power Grid Now is Jumping the Gun - Wait for Transmission Upgrades to Be Completed Before Making Any Zoning Changes

Today, U.S. Senator Charles E. Schumer urged the Federal Energy Regulatory Commission (FERC) to delay their order to implement a new capacity zone that covers a significant portion of the Hudson Valley power grid - a move which could result in a rate increase of between 6 and 15 percent for Hudson Valley ratepayers, or over \$350 million annually - until they can assess the impact of in-progress transmission upgrades. FERC and the New York State Independent System Operator (NYSIO), which operates the state power grid, have proposed a new capacity zone in the grid which includes Orange, Ulster, Rockland, and Sullivan Counties in an attempt to alleviate power constraints in the area by increasing prices to attract new power generation capacity.

Schumer today joined the NYS Public Service Commission (PSC) and

the
New York Power Authority (NYPA), among others, to call for a
delay in
the new zone until transmission upgrades recently approved as
part of
New York State's Energy Highway Project could be realized and
assessed. Schumer explained that transmission projects approved
by
the PSC are set to be completed in 2016, and are projected to
create
upwards of 600 megawatts of power by moving energy more
efficiently
to the Hudson Valley and New York City. Schumer said that FERC's
new
zone would preliminarily jack-up the prices for ratepayers in
advance
of the completion of these projects that will help relieve the
initial problem, and perhaps eliminate the need for a new zone.

"While we need to find better and more creative ways to
alleviate the
power constraints on the Hudson Valley and New York City, FERC's
proposal for a new zone is jumping the gun - it would increase
the
burden on ratepayers before other efforts to solve the problem
can be
completed," said Schumer. "That's why I'm asking FERC to delay
their
implementation of a new capacity zone until at least 2017, when
we
can properly assess the impact of in-progress transmission
upgrades.
These upgrades may lead us to a solution that doesn't include a
proposal that would, in the short-term, line the pockets of
existing
power generators without a substantive increase in power
generation."

The FERC and NYISO order would create a new capacity zone in the
power grid that stretches from New York City to Albany in an
attempt
to alleviate a transmission bottleneck. Currently, there is a
surplus
of cheaper power generated Upstate that does not reach energy-
needy
areas in the Hudson Valley and New York City in an efficient
manner.

The new zone is designed to increase electricity prices to attract new power plants to the region; estimates by the New York Dept. of Public Service (NYDPS) put the annual increase of cost at \$350 million. Orange and Rockland Utilities customers may face a 6 to 10% increase in prices, residents in Central Hudson's area could see a 10% increase, and large industrial ratepayers could see as much as a 15% increase in energy prices. Schumer noted that although he supported finding new energy sources for Hudson Valley residents, he does not support doing so on the backs of ratepayers if, as in this case, other options exist to deliver the needed power more efficiently and cheaply. Schumer expressed concern these large rate hikes could have on small businesses and employers throughout the Hudson Valley. For many companies, such a large spike in energy costs could decrease job creation and expansion efforts at a time when the local economy is on the track for economic growth.

Furthermore, he pointed out that transmission upgrades proposed by the New York State Energy Highway program, which are approved by the PSC and set to go online in 2016, are specifically designed to deliver power around the bottleneck to Hudson Valley customers. One such project is an \$11 million investment in transmission upgrades running from Central Hudson's Rock Tavern substation to Con Edison's Ramapo substation in Rockland County. Schumer explained that it made no sense to jack-up the rates on residents now, before such efforts could be completed.

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The new capacity zone is set to take effect in May of 2014, and Schumer is seeking a delay until 2017 at minimum, or until the transmission upgrades from the Energy Highway initiatives can be properly assessed.

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In basic terms, capacity markets pay generators to help keep existing power plants in service and build new units in order to maintain system reliability. Demand response providers who agree to reduce power usage when needed can also participate in capacity markets.

The new zone will include the current NYISO zones G, H and I in the Lower Hudson Valley and zone J in New York City.

The PSC and NYPA said the state is already working on New York Governor Andrew Cuomo's so-called Energy Highway initiative to expand the state's transmission resources to bring more power from upstate New York to the Lower Hudson Valley and New York City area.

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"We strongly urged FERC to reconsider its decision to create a new capacity zone in New York, which it says is needed to build more power plants downstate to alleviate demand for electricity," PSC Chairwoman Audrey Zibelman said in the release.

"We are well aware of the downstate demand for electricity...However, in its decision, FERC did not take into consideration the ongoing initiatives included in the Governor's Energy Highway," Zibelman said.

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Furthermore, the screening technique used by the NYISO is not the one generally applied across the country, and not exactly what was modeled by Siemens. Siemens used the FERC 715 for 2018 year, as did the NYISO. However, across the country the N-1 criteria is the standard, where one bad event such as a tree falling on the best north-south line for us, occurs. There is then assumed to be a short period for "re-dispatch" or shutting down generators north of the failure, and cranking up those not going full blast south of the failure, in this case. Then a second disaster can be put in, for "N-1-1" with this re-dispatch in place. This N-1-1 is not a "go, no go" normally, but obviously considered a rare occurrence, yet a way of dealing with it needs to be identified. Here it is implied that the N-1-1 contingency has become the criteria to screen the projects. This automatically favors the traditional all new transmission line and ROW. This screening technique uses a very special case, with some other assumptions on the dispatch of generation that were not made fully known to all participants in the two page guidance given out in the Judge Prestemon's technical conference in November, and it actually strongly favors completely new lines. When you fix an existing line and make it much better, at less expense and damage as Boundless Energy did, the way this was done the N-1 takes out not only the new Boundless line from Leeds to Kingston, it takes out the existing 345 kV that was already there and replaced by Boundless - a double whammy. It is a peculiar way to do a screening that strongly favors a completely new line, which may not really be needed. On top of all this, with the NYTransco project by National Grid, the NYISO

somehow assumed that their new project would not be one of the best routes, as Boundless would, so they did not take it out as on N-1-1.

So on the second test, Grid and the local utilities become automatically the winner of a comparison using this peculiar screening technique. On the first cut, N-1 alone, the dispatch of the generators they chose cause one of the many Next Era solutions to do best, although it still flunks N-1 for 1,000 MW(!).

This screening technique has little to do with the real world or the standard way of checking projects in their interconnection studies

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their N-1. So all must be changed in some way to meet the real requirement they will have to meet. This screening technique needs to

be challenged by the public - it automatically takes out any dramatically superior solution as the first N-1, ensuring that such

projects will always be scored lower and gradual mediocrity be the

required way of improving the expensive system we have inherited.

This makes no sense. But for now, since it is now clear what they are

doing, Boundless Energy can add some additional improvements and still be far superior and still cheapest, building on our originally

superior solution, even under this strange screening technique.

Siemens was so upset that they have been working all weekend almost

around the clock, first to figure out what the NYISO actually did to

come up with these results so different from what they had modeled

using standard approach to the 715 FERC Case for 2018, and now, with

the help of Boundless Energy's John Tompkins, how to fix it using our modern techniques and staying in the ROW's using the best available technology. Boundless Energy has already identified three ways of augmenting our solution, which can greatly improve the overall system and still remain the least expensive with no extra right of way or new towers. Siemens is working on these in Syracuse, and will soon be issuing a paper that will first explain the shocking results of the NYISO "screening" and secondly, if this technique is allowed to remain in effect for this proceeding, that Boundless Energy will still meet it better than anyone else, building on the basic project which is still the real world cheapest, fastest and less damaging solution. The public will have to pay for the extra fix, but Boundless Energy will make it as valuable to the overall system as possible, with the least disruption as possible.

Lastly, I strongly urge the NYS Public Service Commission to strongly question the NYISO screening "technique", and how it favors the status-quo solutions of new lines and right of ways-- we should not be doing this any more until modern techniques as is proposed here have first been checked out as the best solution, least disruptive and least expensive. The present approach favors large utility traditional rate base solutions and makes modern equipment and innovation at a disadvantage. The NYS Public Service Commission must demand that, since every proposal failed the N-1, (National Grid failed the worst) under this strange protocol, Boundless Energy must be allowed to submit improvements, if the PSC chooses to go forward with this way of screening.

As our friends from Hudson Valley Concerned Citizens note (see <http://www.hudsonvalley-cc.org/>; also see <http://www.nomonsterpowerlines.com/> and <http://www.clintonunited.org/>):

"Many new transmission lines projects are proposed for the Hudson Valley to allow upstate surplus electricity to be sent down state to New York City and Long Island. These transmission lines will blight the Hudson Valley for centuries to come. We must act now, and demand that new lines are placed UNDERGROUND or are installed on existing towers, setting the precedent for decades to come, preserving the beauty and health of the Hudson Valley, and meet the needs of New York City. Underground cables will greatly increase the reliability and security of electric service to New York City. For some additional cost now we gain exemplary protection from ice storms, hurricanes like Sandy, terrorist attacks and the extraordinary future savings of maintenance and emergency repairs.

The Response to Governor Cuomo's Energy Highway Initiative - to supply New York City with much needed and lower cost electricity and to possibly reverse the impending \$340 Million/yr FERC Capacity Zone Rate hike in the Hudson Valley/NYC region - has produced four proposals to build a major new transmission line.

ONLY ONE of the four projects could be rapidly permitted, and quickly built with few or no intervenors, requiring less than 50 miles of new work to solve the problem - proving to NYSIO and FERC that the rate hike is not needed (see Senator Chuck Schumer's letter to FERC Chairman Jon Wellinghoff below)

Three would use traditional overhead lines that require new taller

'monster' towers and new land for right of way (ROW) incurring extravagant costs over hundreds of miles of congested ROW. These three proposals would be fought by all those Residents through whose property they must pass and whose property would be taken by Eminent Domain. Extending the period of Crippling Property values - which is already well underway - for many more years.

The fourth, from a group of non-traditional utility engineers, uses undergrounding and high tech cable to remain less expensive and avoid new towers or land taking, and becomes nearly storm proof - but presently has no political patron.

By using undergrounding in this project, they establish a precedent for all future transmission line projects in the State of New York.

But political recognition and apparent support may well have arrived indirectly from the highest level, from our Governor in his State of the State plan published January 8, where he explicitly recognized the advantages of the 4th approach, and called for exactly this type of solution:

"To help achieve the balance between providing for the state's electric needs and preserving the local community's quality of life, the State will expedite projects that would be built wholly within existing transmission corridors (i.e., projects that do not result in higher or wider transmission corridors) or buried along existing State-owned rights of way such as waterways and highways . . . This approach does not change the standard review and input process for any project that would require a wider right of way "envelope," taller towers or other expanded transmission corridors."

P. 63 "Building on Success" 2014 State of the State - Gov.
Andrew Cuomo

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Crucial-- Boundless Energy's solution is the only one that could
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completed in time to avoid the deadly "new capacity zone" ten-
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electricity rate hike proposed by FERC/NYISO-- and I know you
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want that to happen.

So please-- reject the other three proposals (along with NYISO's
latest "screening")-- and select Boundless Energy's proposal--

without further delay!

Thank you for your attention to this matter.

Yours,

Joel Tyner
Dutchess County Legislator
Clinton/Rhinebeck
<http://www.dutchessdemocracy.blogspot.com/>
845-453-2105

p.s. Josh Fox, Mark Ruffalo, Mark Jacobson/Stanford, and Anthony
Ingraffea/Robert Howarth/Cornell are right-- locally generated,
renewable power is truly the solution of solutions-- see
<http://www.thesolutionsproject.org/>-- sooner or later we're
going to
have to embrace this type of a win-win-win, green-jobs, cost-
saving,
clean-air, 100% fossil-fuel-free vision for NYS!

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- - - - -

A copy of Schumer's letter to FERC Chariman Jon Wellinghoff is
below:

Dear Chairman Wellinghoff,

I write to urge the Federal Regulatory Commission (FERC) to
delay the
New York Independent System Operator's (NYISO) proposed tariff
revisions to establish a new capacity zone (NCZ) until at least
2017.
As it stands, the NYISO plans to implement the NCS by May 1,
2014 to
coincide with the start of the 2014/2015 capability year. Though
the
stated purpose of this NCZ is to increase electricity prices as
a
means to attract more investment in power generation to address
reliability constraints in the region, the capacity zone does
not
account for new transmission initiatives underway that form part
of
New York State's Energy Highway Blueprint that will address the
deliverability constraint identified by NYISO. The State of New

York's plan to build major transmission facilities by the summer of 2016 will have a material impact on bulk power capacity in the corridor has identified as congested and will eliminate the need for price increases for ratepayers that may be upwards of \$350 million per year.

FOR IMMEDIATE RELEASE: November 7, 2013

SCHUMER: FERC PLAN FOR REZONING HUDSON VALLEY POWER GRID WOULD UNFAIRLY HIKE RATES BEFORE IN- PROGRESS TRANSMISSION UPGRADES ARE FINISHED - SENATOR URGES FERC TO DELAY NEW ZONE AND RESULTING RATE HIKE UNTIL THREE ENERGY HIGHWAY INITIATIVES ARE COMPLETED

NYS "Energy Highway" Initiatives, Due For Completion In 2016, May Alleviate Power Constraints on Hudson Valley- Schumer joins PSC and Others to Urge Fed. Energy Regulation Commission to Delay New 'Capacity Zone' until Upgrades Can Be Quantified and Assessed

FERC's Proposed New Zone Would Raise Prices Between 6 and 15% for Ratepayers in the Hudson Valley, Cost Over \$350 Million Annually

Schumer to FERC: Changing the Power Grid Now is Jumping the Gun

-

Wait for Transmission Upgrades to Be Completed Before Making Any Zoning Changes

Today, U.S. Senator Charles E. Schumer urged the Federal Energy Regulatory Commission (FERC) to delay their order to implement a new capacity zone that covers a significant portion of the Hudson Valley power grid - a move which could result in a rate increase of between 6 and 15 percent for Hudson Valley ratepayers, or over \$350 million annually - until they can assess the impact of in-progress transmission upgrades. FERC and the New York State Independent

System

Operator (NYSIO), which operates the state power grid, have proposed a new capacity zone in the grid which includes Orange, Ulster, Rockland, and Sullivan Counties in an attempt to alleviate power constraints in the area by increasing prices to attract new power generation capacity.

Schumer today joined the NYS Public Service Commission (PSC) and the New York Power Authority (NYPA), among others, to call for a delay in the new zone until transmission upgrades recently approved as part of New York State's Energy Highway Project could be realized and assessed. Schumer explained that transmission projects approved by the PSC are set to be completed in 2016, and are projected to create upwards of 600 megawatts of power by moving energy more efficiently to the Hudson Valley and New York City. Schumer said that FERC's new zone would preliminarily jack-up the prices for ratepayers in advance of the completion of these projects that will help relieve the initial problem, and perhaps eliminate the need for a new zone.

"While we need to find better and more creative ways to alleviate the power constraints on the Hudson Valley and New York City, FERC's proposal for a new zone is jumping the gun - it would increase the burden on ratepayers before other efforts to solve the problem can be completed," said Schumer. "That's why I'm asking FERC to delay their implementation of a new capacity zone until at least 2017, when we can properly assess the impact of in-progress transmission upgrades. These upgrades may lead us to a solution that doesn't include a proposal that would, in the short-term, line the pockets of existing power generators without a substantive increase in power generation."

The FERC and NYISO order would create a new capacity zone in the power grid that stretches from New York City to Albany in an attempt to alleviate a transmission bottleneck. Currently, there is a surplus of cheaper power generated Upstate that does not reach energy-needy areas in the Hudson Valley and New York City in an efficient manner. The new zone is designed to increase electricity prices to attract new power plants to the region; estimates by the New York Dept. of Public Service (NYDPS) put the annual increase of cost at \$350 million. Orange and Rockland Utilities customers may face a 6 to 10% increase in prices, residents in Central Hudson's area could see a 10% increase, and large industrial ratepayers could see as much as a 15% increase in energy prices. Schumer noted that although he supported finding new energy sources for Hudson Valley residents, he does not support doing so on the backs of ratepayers if, as in this case, other options exist to deliver the needed power more efficiently and cheaply. Schumer expressed concern these large rate hikes could have on small businesses and employers throughout the Hudson Valley. For many companies, such a large spike in energy costs could decrease job creation and expansion efforts at a time when the local economy is on the track for economic growth.

Furthermore, he pointed out that transmission upgrades proposed by the New York State Energy Highway program, which are approved by the PSC and set to go online in 2016, are specifically designed to deliver power around the bottleneck to Hudson Valley customers. One such project is an \$11 million investment in transmission upgrades running from Central Hudson's Rock Tavern substation to Con

Edison's Ramapo substation in Rockland County. Schumer explained that it made no sense to jack-up the rates on residents now, before such efforts could be completed.

Schumer argued that the current proposal would undermine statewide efforts to increase the efficiency of transmission and delivery systems, and unfairly hike rates before any new power generation could be achieved. Schumer said that, at the very least, in the event the new zone moves forward, rate hikes should be delayed or phased-in. As it stands, Hudson Valley consumers would see skyrocketing rates even before prospective energy developers could move-in and help increase power generation.

The new capacity zone is set to take effect in May of 2014, and Schumer is seeking a delay until 2017 at minimum, or until the transmission upgrades from the Energy Highway initiatives can be properly assessed.

REUTERS:

<http://www.reuters.com/article/2013/09/26/utilities-newyork-ferc-idUSL2N0HM14K20130926>

New York seeks delay of costly FERC power capacity zone decision
Sept 26 Thu Sep 26, 2013 12:23pm EDT

(Reuters) - New York utility regulators and some of the state's power companies asked federal energy regulators to reverse a recent decision that the New York parties say could increase electric bills in the Lower Hudson Valley by \$350 million a year.

The New York State Public Service Commission (PSC) and the state-owned New York Power Authority (NYPA) said in a press release on Wednesday that the proposed new capacity zone in the Lower Hudson Valley could result in the construction of unnecessary new power

projects.

The PSC, NYPA and other New York utilities asked the U.S. Federal Energy Regulatory Commission (FERC) to reconsider its August decision allowing the state's power grid operator, the New York Independent System Operator (NYISO), to create a new capacity zone in the Lower Hudson Valley that includes New York City.

The NYISO has said it designed the new capacity zone to maintain system reliability and attract investments in new and existing generation and demand response resources.

In basic terms, capacity markets pay generators to help keep existing power plants in service and build new units in order to maintain system reliability. Demand response providers who agree to reduce power usage when needed can also participate in capacity markets.

The new zone will include the current NYISO zones G, H and I in the Lower Hudson Valley and zone J in New York City.

The PSC and NYPA said the state is already working on New York Governor Andrew Cuomo's so-called Energy Highway initiative to expand the state's transmission resources to bring more power from upstate New York to the Lower Hudson Valley and New York City area.

The PSC and NYPA said the Energy Highway could negate the need for FERC to offer financial incentives to build more power plants downstate.

"We strongly urged FERC to reconsider its decision to create a new capacity zone in New York, which it says is needed to build more power plants downstate to alleviate demand for electricity," PSC Chairwoman Audrey Zibelman said in the release.

"We are well aware of the downstate demand for

electricity...However, in its decision, FERC did not take into consideration the ongoing initiatives included in the Governor's Energy Highway," Zibelman said.

The biggest power companies in New York include units of Consolidated Edison Inc, National Grid Plc, Iberdrola SA, Entergy Corp, TransCanada Corp and NRG Energy Inc.

COSTS TO RISE

The PSC said if FERC's plan goes into effect, typical residential customers in the Lower Hudson Valley could see monthly bill increases ranging from 5 percent to almost 10 percent, depending on the utility. The increases for industrial and commercial customers could be even higher, the PSC said.

"Creation of a permanent new capacity zone undermines the Governor's Energy Highway initiatives," Gil Quiniones, NYPA president and chief executive, said in the release.

"The Energy Highway pursues a long-term solution to deliver lower-cost, upstate power to the downstate area by reinforcing the transmission system, Quiniones said, noting the new capacity zone will "take money out of the pockets of ratepayers and result in a windfall of profits for existing power plant owners in the region."

The NYISO plans to implement the new zone by May 1, 2014. The PSC is asking FERC to delay implementing its decision until 2017 and consider how the Energy Highway proposals will affect long-term power prices.

"Without such analysis, FERC cannot properly assess whether it is

causing more harm than good, and whether consumers might end up paying hundreds of millions of dollars for unneeded power plants," the PSC and NYPA said.

Governor Cuomo proposed the Energy Highway initiative in January 2012 to rebuild the state's power system by adding up to 3,200 megawatts (MW) of generation and transmission capacity and clean power.

One megawatt can power about 1,000 New York homes. To: secretary@dps.ny.gov
Subject: Honorable Kathleen Burgess, NYS Public Service Commission
Secretary-- message from Dutchess County Legislator Joel Tyner...
Date: Feb 19, 2014 4:37 PM

Hon. Kathleen H. Burgess
Secretary
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12233-1350

[Re: Case 13-E-0488-- In the Matter of Alternating Current Transmission Upgrades-- Comparative Proceeding]

Dear Ms. Burgess:

I was disturbed to learn recently of the New York "Independent" System Operator's skewed analysis of Boundless Energy's proposal, and I urge you to reject the NYISO analysis.

I've held literally fifteen public forums on this issue at Clinton Town Hall since early September, and both GOP Clinton Town Supervisor Ray Oberly, myself, and 500+ signed on to <http://www.hudsonvalley-cc.org>/petition in support of the Boundless Energy proposal-- as it is by far the least intrusive and least expensive of the four proposals now before the PSC, using the most cutting-edge, state-of-the-art technology-- compared with much

more
intrusive and costly proposals from NYTransco (Central Hudson/National Grid), NextEra, and North American Transmission Corp).

Unlike the other three proposals that would literally destroy our communities, Boundless Energy's common-sense, engineer-driven solution solves the electricity/congestion bottleneck in our region without new towers or taking new right-of-way in Clinton, Milan, Pleasant Valley, and Columbia County.

It is my understanding that a screening of the four proposals was requested by NYSPSC Administrative Law Judge David Prestemon on Oct. 23rd last year. It was supposed to certify that all the proposals had at least 1,000 MW transfer north to south, and, if possible, assign a benefit-to-cost ratio to each project. It is not without significance that the NYISO is supported by the existing utilities and is actually paid through a fund collected by them. They have a relationship with people who work as closely with the NYISO as possible. The NYISO also asked the utilities (originally Niagara Mohawk, now National Grid) to do the obvious fix for the long existing and increasingly expensive "congestion" between Leeds and Pleasant Valley: put one more double 345 kV down the existing corridor. National Grid could not get a positive benefit-to-cost ratio the way they figured on doing it, and taking the new land and higher towers required, so they dragged their feet. The problem became the centerpiece, after trying to close Indian Point, for the Governor's Energy Highway. The NYISO expected solution was the utilities' same-old, same-old solution for the last decade (as opposed to Boundless Energy's innovative proposal)-- NYISO wants an entirely new line to "fix" it. Boundless Energy instead came up with an innovative, modern solution using the carbon-fiber wire and undergrounding for a short distance to go around the problem using

mostly existing equipment and all in existing right of way. It is far cheaper, faster, and less environmentally intrusive, the real, common-sense criteria for selecting the best solution for the system and the public, but this is somewhat disruptive to the traditional way of doing business in the utility world at this point. It will become, we believe, standard in the future. Please don't let the status quo win out here.

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Siemens was so upset that they have been working all weekend almost around the clock, first to figure out what the NYISO actually did to come up with these results so different from what they had modeled using standard approach to the 715 FERC Case for 2018, and now, with the help of Boundless Energy's John Tompkins, how to fix it using our modern techniques and staying in the ROW's using the best available technology. Boundless Energy has already identified three ways of augmenting our solution, which can greatly improve the overall system and still remain the least expensive with no extra right of way or new towers. Siemens is working on these in Syracuse, and will soon be issuing a paper that will first explain the shocking results of the NYISO "screening" and secondly, if this technique is allowed to remain in effect for this proceeding, that Boundless Energy will still meet it better than anyone else, building on the basic project which is still the real world cheapest, fastest and less damaging solution. The public will have to pay for the extra fix, but Boundless Energy will make it as valuable to the overall system as possible, with the least disruption as possible.

Lastly, I strongly urge the NYS Public Service Commission to strongly question the NYISO screening "technique", and how it favors the status-quo solutions of new lines and right of ways-- we should not be doing this any more until modern techniques as is proposed here have first been checked out as the best solution, least disruptive and least expensive. The present approach favors large utility traditional rate base solutions and makes modern equipment

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P. 63 "Building on Success" 2014 State of the State - Gov. Andrew Cuomo

Only one project now meets these goals in the published plans. It does not use the usual new towers or overhead lines, stays completely in existing right of ways, and drills under the Hudson without bottom disturbance. The Governor has clearly recognized its advantages and responded to the public's pleas.

We must work together across the Hudson Valley Region and New York City to let the Governor know that we appreciate his response and we take him at his word. His plan has a quiet disciple: Boundless Energy (<http://www.leadspathwest.com/interactive-map>) the small group of innovative Engineers who designed the underwater/underground Neptune line that was built in 2007 for \$660 M and now carries 20% of all of Long Island's power - safe under the sea bottom and never touched by Sandy!

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THIS IS WHAT THE PEOPLE OF NEW YORK STATE WANT FROM THEIR LEADERSHIP IN NEW TRANSMISSION PROJECTS"

Crucial-- Boundless Energy's solution is the only one that could be completed in time to avoid the deadly "new capacity zone" ten-percent electricity rate hike proposed by FERC/NYISO-- and I know you don't want that to happen.

So please-- reject the other three proposals (along with NYISO's latest "screening")-- and select Boundless Energy's proposal-- without further delay!

Thank you for your attention to this matter.

Yours,

Joel Tyner
Dutchess County Legislator
Clinton/Rhinebeck
<http://www.dutchessdemocracy.blogspot.com/>
845-453-2105

p.s. Josh Fox, Mark Ruffalo, Mark Jacobson/Stanford, and Anthony Ingraffea/Robert Howarth/Cornell are right-- locally generated, renewable power is truly the solution of solutions-- see <http://www.thesolutionsproject.org/>-- sooner or later we're going to have to embrace this type of a win-win-win, green-jobs, cost-saving, clean-air, 100% fossil-fuel-free vision for NYS!

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A copy of Schumer's letter to FERC Chariman Jon Wellinghoff is below:

Dear Chairman Wellinghoff,

I write to urge the Federal Regulatory Commission (FERC) to delay the New York Independent System Operator's (NYISO) proposed tariff revisions to establish a new capacity zone (NCZ) until at least 2017. As it stands, the NYISO plans to implement the NCS by May 1, 2014 to coincide with the start of the 2014/2015 capability year. Though

the
stated purpose of this NCZ is to increase electricity prices as
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New York State's Energy Highway Blueprint that will address the
deliverability constraint identified by NYISO. The State of New
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FOR IMMEDIATE RELEASE: November 7, 2013

SCHUMER: FERC PLAN FOR REZONING HUDSON VALLEY POWER GRID WOULD
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FERC's Proposed New Zone Would Raise Prices Between 6 and 15%
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Schumer to FERC: Changing the Power Grid Now is Jumping the Gun
-
Wait for Transmission Upgrades to Be Completed Before Making Any
Zoning Changes

Today, U.S. Senator Charles E. Schumer urged the Federal Energy

Regulatory Commission (FERC) to delay their order to implement a new capacity zone that covers a significant portion of the Hudson Valley power grid - a move which could result in a rate increase of between 6 and 15 percent for Hudson Valley ratepayers, or over \$350 million annually - until they can assess the impact of in-progress transmission upgrades. FERC and the New York State Independent System Operator (NYSIO), which operates the state power grid, have proposed a new capacity zone in the grid which includes Orange, Ulster, Rockland, and Sullivan Counties in an attempt to alleviate power constraints in the area by increasing prices to attract new power generation capacity.

Schumer today joined the NYS Public Service Commission (PSC) and the New York Power Authority (NYPA), among others, to call for a delay in the new zone until transmission upgrades recently approved as part of New York State's Energy Highway Project could be realized and assessed. Schumer explained that transmission projects approved by the PSC are set to be completed in 2016, and are projected to create upwards of 600 megawatts of power by moving energy more efficiently to the Hudson Valley and New York City. Schumer said that FERC's new zone would preliminarily jack-up the prices for ratepayers in advance of the completion of these projects that will help relieve the initial problem, and perhaps eliminate the need for a new zone.

"While we need to find better and more creative ways to alleviate the power constraints on the Hudson Valley and New York City, FERC's proposal for a new zone is jumping the gun - it would increase the burden on ratepayers before other efforts to solve the problem can be completed," said Schumer. "That's why I'm asking FERC to delay

their implementation of a new capacity zone until at least 2017, when we can properly assess the impact of in-progress transmission upgrades. These upgrades may lead us to a solution that doesn't include a proposal that would, in the short-term, line the pockets of existing power generators without a substantive increase in power generation."

The FERC and NYISO order would create a new capacity zone in the power grid that stretches from New York City to Albany in an attempt to alleviate a transmission bottleneck. Currently, there is a surplus of cheaper power generated Upstate that does not reach energy-needy areas in the Hudson Valley and New York City in an efficient manner. The new zone is designed to increase electricity prices to attract new power plants to the region; estimates by the New York Dept. of Public Service (NYDPS) put the annual increase of cost at \$350 million. Orange and Rockland Utilities customers may face a 6 to 10% increase in prices, residents in Central Hudson's area could see a 10% increase, and large industrial ratepayers could see as much as a 15% increase in energy prices. Schumer noted that although he supported finding new energy sources for Hudson Valley residents, he does not support doing so on the backs of ratepayers if, as in this case, other options exist to deliver the needed power more efficiently and cheaply. Schumer expressed concern these large rate hikes could have on small businesses and employers throughout the Hudson Valley. For many companies, such a large spike in energy costs could decrease job creation and expansion efforts at a time when the local economy is on the track for economic growth.

Furthermore, he pointed out that transmission upgrades proposed by the New York State Energy Highway program, which are approved by the PSC and set to go online in 2016, are specifically designed to deliver power around the bottleneck to Hudson Valley customers. One such project is an \$11 million investment in transmission upgrades running from Central Hudson's Rock Tavern substation to Con Edison's Ramapo substation in Rockland County. Schumer explained that it made no sense to jack-up the rates on residents now, before such efforts could be completed.

Schumer argued that the current proposal would undermine statewide efforts to increase the efficiency of transmission and delivery systems, and unfairly hike rates before any new power generation could be achieved. Schumer said that, at the very least, in the event the new zone moves forward, rate hikes should be delayed or phased-in. As it stands, Hudson Valley consumers would see skyrocketing rates even before prospective energy developers could move-in and help increase power generation.

The new capacity zone is set to take effect in May of 2014, and Schumer is seeking a delay until 2017 at minimum, or until the transmission upgrades from the Energy Highway initiatives can be properly assessed.

REUTERS:

<http://www.reuters.com/article/2013/09/26/utilities-newyork-ferc-idUSL2N0HM14K20130926>

New York seeks delay of costly FERC power capacity zone decision
Sept 26 Thu Sep 26, 2013 12:23pm EDT

(Reuters) - New York utility regulators and some of the state's power companies asked federal energy regulators to reverse a recent

decision that the New York parties say could increase electric bills in the Lower Hudson Valley by \$350 million a year.

The New York State Public Service Commission (PSC) and the state-owned New York Power Authority (NYPA) said in a press release on Wednesday that the proposed new capacity zone in the Lower Hudson Valley could result in the construction of unnecessary new power projects.

The PSC, NYPA and other New York utilities asked the U.S. Federal Energy Regulatory Commission (FERC) to reconsider its August decision allowing the state's power grid operator, the New York Independent System Operator (NYISO), to create a new capacity zone in the Lower Hudson Valley that includes New York City.

The NYISO has said it designed the new capacity zone to maintain system reliability and attract investments in new and existing generation and demand response resources.

In basic terms, capacity markets pay generators to help keep existing power plants in service and build new units in order to maintain system reliability. Demand response providers who agree to reduce power usage when needed can also participate in capacity markets.

The new zone will include the current NYISO zones G, H and I in the Lower Hudson Valley and zone J in New York City.

The PSC and NYPA said the state is already working on New York Governor Andrew Cuomo's so-called Energy Highway initiative to expand the state's transmission resources to bring more power from upstate New York to the Lower Hudson Valley and New York City area.

The PSC and NYPA said the Energy Highway could negate the need for

FERC to offer financial incentives to build more power plants downstate.

"We strongly urged FERC to reconsider its decision to create a new capacity zone in New York, which it says is needed to build more power plants downstate to alleviate demand for electricity," PSC Chairwoman Audrey Zibelman said in the release.

"We are well aware of the downstate demand for electricity...However, in its decision, FERC did not take into consideration the ongoing initiatives included in the Governor's Energy Highway," Zibelman said.

The biggest power companies in New York include units of Consolidated Edison Inc, National Grid Plc, Iberdrola SA, Entergy Corp, TransCanada Corp and NRG Energy Inc.

COSTS TO RISE

The PSC said if FERC's plan goes into effect, typical residential customers in the Lower Hudson Valley could see monthly bill increases ranging from 5 percent to almost 10 percent, depending on the utility. The increases for industrial and commercial customers could be even higher, the PSC said.

"Creation of a permanent new capacity zone undermines the Governor's Energy Highway initiatives," Gil Quiniones, NYPA president and chief executive, said in the release.

"The Energy Highway pursues a long-term solution to deliver lower-cost, upstate power to the downstate area by reinforcing the transmission system, Quiniones said, noting the new capacity zone will "take money out of the pockets of ratepayers and result in a windfall of profits for existing power plant owners in the region."

The NYISO plans to implement the new zone by May 1, 2014. The PSC is asking FERC to delay implementing its decision until 2017 and consider how the Energy Highway proposals will affect long-term power prices.

"Without such analysis, FERC cannot properly assess whether it is causing more harm than good, and whether consumers might end up paying hundreds of millions of dollars for unneeded power plants," the PSC and NYPA said.

Governor Cuomo proposed the Energy Highway initiative in January 2012 to rebuild the state's power system by adding up to 3,200 megawatts (MW) of generation and transmission capacity and clean power.

One megawatt can power about 1,000 New York homes. To: secretary@dps.ny.gov
Subject: Honorable Kathleen Burgess, NYS Public Service Commission
Secretary-- message from Dutchess County Legislator Joel Tyner...
Date: Feb 19, 2014 4:37 PM

Hon. Kathleen H. Burgess
Secretary
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12233-1350

[Re: Case 13-E-0488-- In the Matter of Alternating Current Transmission Upgrades-- Comparative Proceeding]

Dear Ms. Burgess:

I was disturbed to learn recently of the New York "Independent" System Operator's skewed analysis of Boundless Energy's proposal, and I urge you to reject the NYISO analysis.

I've held literally fifteen public forums on this issue at

Clinton

Town Hall since early September, and both GOP Clinton Town Supervisor

Ray Oberly, myself, and 500+ signed on to

<http://www.hudsonvalley-cc.org/petition> in support of the Boundless

Energy proposal-- as it is by far the least intrusive and least expensive of the four proposals now before the PSC, using the most

cutting-edge, state-of-the-art technology-- compared with much more

intrusive and costly proposals from NYTransco (Central Hudson/National Grid), NextEra, and North American Transmission Corp).

Unlike the other three proposals that would literally destroy our

communities, Boundless Energy's common-sense, engineer-driven solution solves the electricity/congestion bottleneck in our region

without new towers or taking new right-of-way in Clinton, Milan, Pleasant Valley, and Columbia County.

It is my understanding that a screening of the four proposals was

requested by NYSPSC Administrative Law Judge David Prestemon on Oct.

23rd last year. It was supposed to certify that all the proposals had

at least 1,000 MW transfer north to south, and, if possible, assign a

benefit-to-cost ratio to each project. It is not without significance that the NYISO is supported by the existing utilities

and is actually paid through a fund collected by them. They have a

relationship with people who work as closely with the NYISO as possible. The NYISO also asked the utilities (originally Niagara Mohawk, now National Grid) to do the obvious fix for the long existing and increasingly expensive "congestion" between Leeds and

Pleasant Valley: put one more double 345 kV down the existing corridor. National Grid could not get a positive benefit-to-cost ratio the way they figured on doing it, and taking the new land and

higher towers required, so they dragged their feet. The problem became the centerpiece, after trying to close Indian Point, for

the
Governor's Energy Highway. The NYISO expected solution was the
utilities' same-old, same-old solution for the last decade (as
opposed to Boundless Energy's innovative proposal)-- NYISO wants
an
entirely new line to "fix" it. Boundless Energy instead came up
with
an innovative, modern solution using the carbon-fiber wire and
undergrounding for a short distance to go around the problem
using
mostly existing equipment and all in existing right of way. It
is far
cheaper, faster, and less environmentally intrusive, the real,
common-sense criteria for selecting the best solution for the
system
and the public, but this is somewhat disruptive to the
traditional
way of doing business in the utility world at this point. It
will
become, we believe, standard in the future. Please don't let the
status quo win out here.

Furthermore, the screening technique used by the NYISO is not
the one
generally applied across the country, and not exactly what was
modeled by Siemens. Siemens used the FERC 715 for 2018 year, as
did
the NYISO. However, across the country the N-1 criteria is the
standard, where one bad event such as a tree falling on the best
north-south line for us, occurs. There is then assumed to be a
short
period for "re-dispatch" or shutting down generators north of
the
failure, and cranking up those not going full blast south of the
failure, in this case. Then a second disaster can be put in, for
"N-1-1" with this re-dispatch in place. This N-1-1 is not a "go,
no
go" normally, but obviously considered a rare occurrence, yet a
way
of dealing with it needs to be identified. Here it is implied
that
the N-1-1 contingency has become the criteria to screen the
projects.
This automatically favors the traditional all new transmission
line
and ROW. This screening technique uses a very special case, with
some

other assumptions on the dispatch of generation that were not made fully known to all participants in the two page guidance given out in the Judge Prestemon's technical conference in November, and it actually strongly favors completely new lines. When you fix an existing line and make it much better, at less expense and damage as Boundless Energy did, the way this was done the N-1 takes out not only the new Boundless line from Leeds to Kingston, it takes out the existing 345 kV that was already there and replaced by Boundless - a double whammy. It is a peculiar way to do a screening that strongly favors a completely new line, which may not really be needed. On top of all this, with the NYTransco project by National Grid, the NYISO somehow assumed that their new project would not be one of the best routes, as Boundless would, so they did not take it out as on N-1-1. So on the second test, Grid and the local utilities become automatically the winner of a comparison using this peculiar screening technique. On the first cut, N-1 alone, the dispatch of the generators they chose cause one of the many Next Era solutions to do best, although it still flunks N-1 for 1,000 MW(!).

This screening technique has little to do with the real world or the standard way of checking projects in their interconnection studies required for final approval. In the real requirements that FERC will find approval with, the N-1 contingency must be met, and the N-1-1 checked. Everyone of the four projects failed the way the NYISO did their N-1. So all must be changed in some way to meet the real requirement they will have to meet. This screening technique needs to be challenged by the public - it automatically takes out any dramatically superior solution as the first N-1, ensuring that

such projects will always be scored lower and gradual mediocrity be the required way of improving the expensive system we have inherited. This makes no sense. But for now, since it is now clear what they are doing, Boundless Energy can add some additional improvements and still be far superior and still cheapest, building on our originally superior solution, even under this strange screening technique.

Siemens was so upset that they have been working all weekend almost around the clock, first to figure out what the NYISO actually did to come up with these results so different from what they had modeled using standard approach to the 715 FERC Case for 2018, and now, with the help of Boundless Energy's John Tompkins, how to fix it using our modern techniques and staying in the ROW's using the best available technology. Boundless Energy has already identified three ways of augmenting our solution, which can greatly improve the overall system and still remain the least expensive with no extra right of way or new towers. Siemens is working on these in Syracuse, and will soon be issuing a paper that will first explain the shocking results of the NYISO "screening" and secondly, if this technique is allowed to remain in effect for this proceeding, that Boundless Energy will still meet it better than anyone else, building on the basic project which is still the real world cheapest, fastest and less damaging solution. The public will have to pay for the extra fix, but Boundless Energy will make it as valuable to the overall system as possible, with the least disruption as possible.

Lastly, I strongly urge the NYS Public Service Commission to strongly question the NYISO screening "technique", and how it

favours
the status-quo solutions of new lines and right of ways-- we
should
not be doing this any more until modern techniques as is
proposed
here have first been checked out as the best solution, least
disruptive and least expensive. The present approach favours
large
utility traditional rate base solutions and makes modern
equipment
and innovation at a disadvantage. The NYS Public Service
Commission
must demand that, since every proposal failed the N-1, (National
Grid
failed the worst) under this strange protocol, Boundless Energy
must
be allowed to submit improvements, if the PSC chooses to go
forward
with this way of screening.

As our friends from Hudson Valley Concerned Citizens note (see
<http://www.hudsonvalley-cc.org/>; also see
<http://www.nomonsterpowerlines.com/> and
<http://www.clintonunited.org/>):

"Many new transmission lines projects are proposed for the
Hudson
Valley to allow upstate surplus electricity to be sent down
state to
New York City and Long Island. These transmission lines will
blight
the Hudson Valley for centuries to come. We must act now, and
demand
that new lines are placed UNDERGROUND or are installed on
existing
towers, setting the precedent for decades to come, preserving
the
beauty and health of the Hudson Valley, and meet the needs of
New
York City. Underground cables will greatly increase the
reliability
and security of electric service to New York City. For some
additional cost now we gain exemplary protection from ice
storms,
hurricanes like Sandy, terrorist attacks and the extraordinary
future
savings of maintenance and emergency repairs.

The Response to Governor Cuomo's Energy Highway Initiative - to supply New York City with much needed and lower cost electricity and to possibly reverse the impending \$340 Million/yr FERC Capacity Zone Rate hike in the Hudson Valley/NYC region - has produced four proposals to build a major new transmission line.

ONLY ONE of the four projects could be rapidly permitted, and quickly built with few or no intervenors, requiring less than 50 miles of new work to solve the problem - proving to NYSIO and FERC that the rate hike is not needed (see Senator Chuck Schumer's letter to FERC Chairman Jon Wellinghoff below)

Three would use traditional overhead lines that require new taller 'monster' towers and new land for right of way (ROW) incurring extravagant costs over hundreds of miles of congested ROW. These three proposals would be fought by all those Residents through whose property they must pass and whose property would be taken by Eminent Domain. Extending the period of Crippling Property values - which is already well underway - for many more years.

The fourth, from a group of non-traditional utility engineers, uses undergrounding and high tech cable to remain less expensive and avoid new towers or land taking, and becomes nearly storm proof - but presently has no political patron.

By using undergrounding in this project, they establish a precedent for all future transmission line projects in the State of New York.

But political recognition and apparent support may well have arrived indirectly from the highest level, from our Governor in his State of the State plan published January 8, where he explicitly

recognized
the advantages of the 4th approach, and called for exactly this
type
of solution:

"To help achieve the balance between providing for the state's
electric needs and preserving the local community's quality of
life,
the State will expedite projects that would be built wholly
within
existing transmission corridors (i.e., projects that do not
result in
higher or wider transmission corridors) or buried along existing
State-owned rights of way such as waterways and highways . . .
This
approach does not change the standard review and input process
for
any project that would require a wider right of way "envelope,"
taller towers or other expanded transmission corridors."

P. 63 "Building on Success" 2014 State of the State - Gov.
Andrew Cuomo

Only one project now meets these goals in the published plans.
It
does not use the usual new towers or overhead lines, stays
completely
in existing right of ways, and drills under the Hudson without
bottom
disturbance. The Governor has clearly recognized its advantages
and
responded to the public's pleas.

We must work together across the Hudson Valley Region and New
York
City to let the Governor know that we appreciate his response
and we
take him at his word. His plan has a quiet disciple: Boundless
Energy
(<http://www.leedspathwest.com/interactive-map>) the small group
of
innovative Engineers who designed the underwater/underground
Neptune
line that was built in 2007 for \$660 M and now carries 20% of
all of
Long Island's power - safe under the sea bottom and never
touched by

Sandy!

We need to carry the message to the Governor that for now, we recognize that only the Boundless project is marching to his drumbeat, with 21st Century solutions!

THIS IS WHAT THE PEOPLE OF NEW YORK STATE WANT FROM THEIR LEADERSHIP IN NEW TRANSMISSION PROJECTS"

Crucial-- Boundless Energy's solution is the only one that could be completed in time to avoid the deadly "new capacity zone" ten-percent electricity rate hike proposed by FERC/NYISO-- and I know you don't want that to happen.

So please-- reject the other three proposals (along with NYISO's latest "screening")-- and select Boundless Energy's proposal-- without further delay!

Thank you for your attention to this matter.

Yours,

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REUTERS:

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"We are well aware of the downstate demand for electricity...However, in its decision, FERC did not take into consideration the ongoing initiatives included in the Governor's Energy Highway," Zibelman said.

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The PSC said if FERC's plan goes into effect, typical residential customers in the Lower Hudson Valley could see monthly bill increases ranging from 5 percent to almost 10 percent, depending on the utility. The increases for industrial and commercial customers could be even higher, the PSC said.

"Creation of a permanent new capacity zone undermines the Governor's Energy Highway initiatives," Gil Quiniones, NYPA president and chief executive, said in the release.

"The Energy Highway pursues a long-term solution to deliver lower-cost, upstate power to the downstate area by reinforcing the transmission system, Quiniones said, noting the new capacity zone will "take money out of the pockets of ratepayers and result in a windfall of profits for existing power plant owners in the region."

The NYISO plans to implement the new zone by May 1, 2014. The PSC is asking FERC to delay implementing its decision until 2017 and consider how the Energy Highway proposals will affect long-term power prices.

"Without such analysis, FERC cannot properly assess whether it is causing more harm than good, and whether consumers might end up paying hundreds of millions of dollars for unneeded power plants," the PSC and NYPA said.

Governor Cuomo proposed the Energy Highway initiative in January 2012 to rebuild the state's power system by adding up to 3,200 megawatts (MW) of generation and transmission capacity and clean power.

One megawatt can power about 1,000 New York homes.vvvvvvvv