

CASE 06-T-0650

NEW YORK REGIONAL INTERCONNECT INC.
APPLICATION FOR NYRI TRANSMISSION LINE

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INTERROGATORY / DOCUMENT REQUESTS

Request No.: CECONY-3
Requested By: Jeffrey L. Riback, Esq.
Date of Request: 3/9/09
Reply Date: 3/19/09
Subject: System Reliability Impact Study

Please refer to the rebuttal testimony of Con Edison witness Michael Forte at pp. 2-3, lines 19-5. Is Mr. Forte's updated SRIS analysis for the thermal and voltage transfer limits at the UPNY-ConEd interface consistent with the NYISO's existing guidelines for the conduct of such an analysis, including his use of the data provided by NYISO to Con Edison in response to CECONY-1(c)? If not, in what respects is the analysis, including his use of data, inconsistent with those guidelines?

Response

The base case the NYISO provided to Con Edison in response to CECONY-1(c) was the SRIS base case for the project in Queue Position 270. The use of this SRIS base case for an SRIS analysis of the New York Regional Interconnect project ("NYRI") is inconsistent with the base case requirements of Attachment X of the NYISO OATT. Specifically, the base case for an SRIS must include those projects above the studied project in the interconnection queue, but not those projects below the studied project. NYRI is in the NYISO's interconnection queue at Queue Position 191. The SRIS base case for Queue Position 270 includes projects in Queue Positions 192 through 269 that should not, under the NYISO OATT, be included in an SRIS base case for NYRI.

The Rebuttal Testimony of Michael Forte does not otherwise include enough detail to allow the NYISO to conclude whether or not the analysis described in that Rebuttal Testimony was performed in a manner consistent with NYISO procedures.

STATE OF NEW YORK
DEPT. OF PUBLIC SERVICE
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