

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on July 17, 2025

COMMISSIONERS PRESENT:

Rory M. Christian, Chair
James S. Alesi
David J. Valesky
John B. Maggiore
Uchenna S. Bright
Denise M. Sheehan

CASE 22-E-0633 - In the Matter of New York Independent System
Operator, Inc. Proposed Public Policy
Transmission Needs for Consideration for 2022.

ORDER WITHDRAWING PUBLIC POLICY TRANSMISSION NEED

(Issued and Effective July 17, 2025)

BY THE COMMISSION:

INTRODUCTION

On June 22, 2023, the Public Service Commission (Commission) identified a Public Policy Requirement (PPR), as defined under the New York Independent System Operator, Inc.'s (NYISO) tariff, driving the need for additional transmission facilities to deliver at least 4,770 megawatts (MW) of offshore wind energy generation into New York City (Zone J).¹ The Commission determined that the offshore wind mandates established in the Climate Leadership and Community Protection

¹ See Case 22-E-0633, Order Addressing Public Policy Requirements for Transmission Planning Purposes (issued June 22, 2023) (PPR Order); see also, Attachment Y of the NYISO Open Access Transmission Tariff (OATT). Unless otherwise defined in this Order, capitalized terms used herein have the same meanings given to them under the OATT.

Act (CLCPA) were driving this need, and referred this, as a Public Policy Transmission Need (PPTN), to the NYISO for the solicitation and evaluation of potential solutions.² In response to the PPR Order, the NYISO launched its solicitation on April 4, 2024, and is currently evaluating the proposed transmission solutions submitted in response to the solicitation.³

Notwithstanding the NYISO's active evaluation process, recent actions taken by the federal government have drastically reduced the prospects for the development and construction of the offshore wind resources that the PPR Order anticipated would be served by the proposed transmission solutions. Given this uncertainty and the prospect of prematurely making significant financial commitments, the Commission finds, as discussed below, that the PPTN finding should be withdrawn at this time.

BACKGROUND

The Public Policy Transmission Planning Process

The NYISO's Public Policy Transmission Planning Process, approved by the Federal Energy Regulatory Commission (FERC), provides for the consideration of public policy-driven transmission needs on a two-year cycle or upon the Public Service Commission's request.⁴ Under the NYISO tariff, the Commission has the role of identifying any Public Policy Requirements that may be "driving" the need for transmission facilities, while the Long Island Power Authority (LIPA) is

² See L. 2019, Ch. 106, §4 (codified, in part, in Public Service Law (PSL) §66-p(2) and (5)).

³ New York City Offshore Wind Public Policy Transmission Need Project Solicitation (April 4, 2024), available at: <https://www.nyiso.com/documents/20142/40894368/New-York-City-Offshore-Wind-Public-Policy-Transmission-Need-Project-Solicitation.pdf>.

⁴ NYISO OATT, Attachment Y, §31.4.1.

responsible for identifying transmission needs driven by Public Policy Requirements within the Long Island Transmission District. The NYISO Board of Directors (Board) has responsibility for selecting the more efficient or cost-effective transmission solution to a PPTN identified by the Commission.⁵

Each cycle commences with a solicitation period during which interested entities may propose transmission needs that they believe are driven by Public Policy Requirements.⁶ The NYISO posts all submissions on its website and then files them with the Commission. The Commission considers the proposals and determines whether to "issue a written statement that identifies the relevant Public Policy Requirements driving transmission needs and explains why it has identified the Public Policy Transmission Needs for which transmission solutions will be requested by the [NY]ISO."⁷

If the Commission determines there is a PPTN, the NYISO opens a solicitation for proposed solutions. The NYISO then conducts a preliminary analysis to verify that each proposed solution is viable and sufficient to meet the PPTN. The NYISO presents the results of its Viability and Sufficiency Assessment to stakeholders, interested parties, and Department of Public Service (DPS) Staff for review and comment. The NYISO also files its final Viability and Sufficiency Assessment with the Commission.

Following that step, the NYISO tariff authorizes the NYISO to proceed to a full evaluation of the transmission solutions that qualify as viable and sufficient. However, the

⁵ NYISO OATT, Attachment Y, §31.4.11.2.

⁶ NYISO OATT, Attachment Y, §31.4.2.

⁷ NYISO OATT, Attachment Y, §31.4.2.1.

NYISO tariff also acknowledges that the Commission may determine that a transmission need should no longer be evaluated or selected by the NYISO, so long as the Commission acts prior to the NYISO Board's selection of the more efficient or cost-effective transmission solution.⁸

If the Commission does not terminate the assessment process, the NYISO completes its evaluations and provides its analyses of the competing solutions in a Public Policy Transmission Planning Report. Thereafter, the NYISO Board may select or decline to select a project.⁹ Transmission projects selected by the NYISO Board are eligible for cost allocation and recovery under the NYISO's OATT, which includes a default statewide load ratio share cost allocation formula.¹⁰

The PPR Order and NYISO Solicitation

The PPR Order was issued pursuant to these above rules and procedures. The Commission found that the CLCPA offshore wind goal for 2035, as refined by the Commission's CES Modification Order, constituted a PPR, and that transmission to interconnection points in New York City was needed to integrate offshore wind sources with the mainland grid.¹¹ Recognizing the complexity of siting cables in the constrained New York Harbor environment, the Commission took the additional step of tasking other federal, state, and local agencies with a role in the process to provide input to the NYISO on permitting issues related to the transmission proposals.

⁸ NYISO OATT, Attachment Y, §31.4.6.7.

⁹ NYISO OATT, Attachment Y, §31.4.5.1.

¹⁰ NYISO OATT, Attachment Y, §31.5.5.4.3.

¹¹ PPR Order, referencing Case 15-E-0302, Large-Scale Renewable Program and a Clean Energy Standard, Order Adopting Modifications to the Clean Energy Standard (issued October 15, 2020) (CES Modification Order).

After several months of preparatory work, the NYISO initiated its solicitation for transmission solutions pursuant to the PPR Order on April 4, 2024. Twenty-eight proposals were submitted by four different developers. The NYISO filed its Viability and Sufficiency Assessment in this proceeding on October 30, 2024, indicating that all 28 proposals had qualified for full evaluation. On June 25, 2025, the NYISO reported on its progress with the evaluations and released preliminary independent capital cost estimates for the competing proposals that range from \$7.9 billion to \$23.9 billion.¹² The NYISO's evaluations are ongoing.

Recent Events Impacting Offshore Wind Development

On January 20, 2025, President Trump issued a Presidential Memorandum (Memo) directing federal agencies to halt certain activities related to the development of offshore wind generation sources.¹³ The Memo withdraws all leasing areas on the Outer Continental Shelf from consideration for further wind energy leasing. Existing wind energy leases were continued but were made subject to a review process to be conducted by the Secretary of the Interior (Interior Secretary). The Memo directs the Interior Secretary to review "the ecological, economic, and environmental necessity of terminating or amending

¹² See NYC PPTN Update: Preliminary Evaluation Results included in materials for June 25, 2025 meeting:
https://www.nyiso.com/documents/20142/52151333/NYCPPTN_ESPWG_2025_06_25.pdf/8e6b16fb-534a-c5d5-2614-9671fada1f4f.

¹³ Temporary Withdrawal of All Areas of the Outer Continental Shelf from Offshore Wind Leasing and Review of the Federal Government's Leasing and Permitting Practices for Wind Projects (January 20, 2025), available at:
<https://www.whitehouse.gov/presidential-actions/2025/01/temporary-withdrawal-of-all-areas-on-the-outer-continental-shelf-from-offshore-wind-leasing-and-review-of-the-federal-governments-leasing-and-permitting-practices-for-wind-projects/>.

any existing wind energy leases” and submit recommendations to the President.¹⁴ In addition, the Memo prohibits federal agencies from issuing or renewing “approvals, rights of way, permits, leases, or loans for onshore or offshore wind projects,” pending the Interior Secretary’s “comprehensive assessment” of federal wind leasing and permitting practices.¹⁵ The Memo states that its directives are temporary but provides no timeline for completing the reviews or for the resumption of permitting activity.

Issuance of the Memo had immediate and far-reaching effects on the offshore wind industry. States with plans for offshore wind investment announced changes to their programs, including pauses in generation procurements.¹⁶ Project developers announced cutbacks and, in some cases, abandonment of development efforts.¹⁷ As of the date of this Order, the status of the Interior Secretary’s assessment of federal wind leasing and permitting practices is unclear and the duration of the halt on offshore wind permitting activities remains unknown.

¹⁴ Id., Section 1.

¹⁵ Id., Section 2.

¹⁶ For example, Governor Murphy announced New Jersey would stop approving offshore wind projects. See <https://www.politico.com/news/2025/02/04/trump-new-jersey-wind-energy-00202248>.

¹⁷ Shell withdrew from the New Jersey Atlantic Shores project, which was a joint venture with EDF Renewables. See <https://apnews.com/article/wind-energy-offshore-turbines-trump-executive-order-new-jersey>. In Maine, Pine Tree Offshore Wind paused contract negotiations. See <https://www.pressherald.com/2025/04/02/developer-for-gulf-of-maine-offshore-wind-project-puts-power-contract-talks-on-hold>. SouthCoast Wind delayed its contract negotiations with utilities in Rhode Island and Massachusetts. See <https://rhodeislandcurrent.com/2025/03/31/awash-in-uncertainty-southcoast-wind-contract-delayed-for-a-third-time>.

NOTICE OF PROPOSED RULE MAKING

In accordance with the State Administrative Procedure Act (SAPA) §202(1) and the Commission's August 2014 Policy Statement, a Notice of Proposed Rule Making was published in the State Register on December 4, 2024 [SAPA No. 22-E-0633SP2]. The time for submission of comments pursuant to the SAPA notice expired on February 3, 2025. The comments received are summarized in the Appendix and discussed below.

LEGAL AUTHORITY

The transmission planning activities addressed in this Order are carried out in accordance with the Commission's August 2014 Policy Statement and the NYISO OATT. Authority to undertake transmission planning is also derived from the Public Service Law (PSL). Pursuant to PSL §5(1), the "jurisdiction, supervision, powers and duties" of the Commission extend to the "manufacture, conveying, transportation, sale or distribution of ... electricity." PSL §5(2) requires the Commission to "encourage all persons and corporations subject to its jurisdiction to formulate and carry out long-range programs, individually or cooperatively, for the performance of their public service responsibilities with economy, efficiency, and care for the public safety, the preservation of environmental values and the conservation of natural resources."

In addition, PSL §65(1) provides the Commission with authority to ensure that "every electric corporation and every municipality shall furnish and provide such service, instrumentalities and facilities as shall be safe and adequate and, in all respects, just and reasonable." The Commission also has authority under PSL §66(5) to prescribe the "safe, efficient and adequate property, equipment and appliances thereafter to be used, maintained and operated for the security and accommodation

of the public" whenever the Commission determines that the utility's existing equipment is "unsafe, inefficient or inadequate." Moreover, PSL §66(2) provides that the Commission shall "examine or investigate the methods employed by ... persons, corporations and municipalities in manufacturing, distributing and supplying ... electricity ... and have power to order such reasonable improvements as will best promote the public interest, preserve the public health and protect those using such ... electricity." PSL §4(1) also expressly provides the Commission with "all powers necessary or proper to enable it to carry out the purposes of [the PSL]."

DISCUSSION

The Commission's determination in the PPR Order was intended to support the CLCPA's target for 9 gigawatts (GW) of offshore wind energy by 2035. At the time, the Commission cited the progress by the New York State Energy Research and Development Authority (NYSERDA) in contracting with offshore wind project developers as evidence of the need to plan transmission infrastructure to serve future generation sources. NYSERDA's 2018 and 2020 solicitations had resulted in contracts with four projects totaling 4,230 MW of capacity, all connecting radially to the mainland grid.¹⁸ These were Sunrise Wind and Empire Wind 1, totaling approximately 1,740 MW of capacity, and Empire Wind 2 and Beacon Wind, representing 1,260 MW and 1,230

¹⁸ PPR Order, p. 33.

MW, respectively.¹⁹ The PPR Order pointed to NYSERDA's then-pending 2022 procurement (NY3) and acknowledged NYSERDA's evident progress toward the 9 GW target.

That progress supported the Commission's determination to seek transmission proposals that could be constructed in time to interconnect the balance of the generation needed to achieve the 9 GW milestone. The PPR Order explained that the transmission infrastructure would accommodate future NYSERDA procurements and also make capacity available to participants in the NY3 procurement, with the overall objective of lowering the costs of the offshore wind program.²⁰ In light of the CLCPA goal for 2035, the Commission sought proposals that could meet an in-service date of January 1, 2033.

Progress continued into October 2023, when NYSERDA provisionally awarded contracts to three offshore wind projects from the NY3 solicitation.²¹ However, the two projects awarded

¹⁹ Case 20-T-0617, Application of Sunrise Wind LLC for a Certificate of Environmental Compatibility and Public Need. Case 21-T-0366, Application of Empire Offshore Wind LLC for a Certificate of Environmental Compatibility and Public Need. Case 22-T-0346, Application of Empire Offshore Wind LLC for a Certificate of Environmental Compatibility and Public Need. Case 22-T-0294, Application of Beacon Wind LLC for a Certificate of Environmental Compatibility and Public Need.

²⁰ PPR Order, pp. 35-37.

²¹ NYSERDA selected Attentive Energy One, Community Offshore Wind, and Excelsior Wind. See <https://www.nyserda.ny.gov/All-Programs/Offshore-Wind/Focus-Areas/Offshore-Wind-Solicitations/2022-Solicitation>.

under the 2020 solicitation terminated their contracts²² and NYSERDA did not finalize the provisional awards for the NY3 participants.²³ NYSERDA conducted an expedited solicitation in 2023, which resulted in new contracts with Empire Wind I and Sunrise Wind.²⁴ A fifth offshore wind solicitation was launched on July 17, 2024, resulting in 25 submissions.²⁵ At the present time, NYSERDA has not yet announced awards from the fifth solicitation. However, we note that none of the proposals under this solicitation proposed to utilize the New York City offshore wind PPTN. The next offshore wind solicitations would have been the first opportunity to provide for use of the PPTN, which was

²² See <https://www.nyserda.ny.gov/All-Programs/Offshore-Wind/Focus-Areas/Offshore-Wind-Solicitations/2020-Solicitation>. NYSERDA selected Empire Wind 2 and Beacon Wind under the 2020 solicitation and both projects terminated their contracts with NYSERDA. The industry cited inflation and supply chain pressures in petitions seeking amendment of the contracts. See June 7, 2023, petitions by the Alliance for Clean Energy New York, Sunrise Wind LLC, and Empire Offshore Wind LLC/Beacon Wind LLC in 15-E-0302. The Commission denied the requested relief. See Case 15-E-0302, Order Denying Petitions Seeking to Amend Contracts with Renewable Energy Projects (issued October 12, 2023) (October 2023 Order). Empire Wind 2 terminated its contract on December 31, 2023, and Beacon Wind terminated its contract on January 25, 2024.

²³ See <https://www.nyserda.ny.gov/All-Programs/Offshore-Wind/Focus-Areas/Offshore-Wind-Solicitations/2022-Solicitation>.

²⁴ See <https://www.nyserda.ny.gov/All-Programs/Offshore-Wind/Focus-Areas/Offshore-Wind-Solicitations/2023-Solicitation>.

²⁵ On September 9, 2024, NYSERDA received 25 proposals in response to ORECRFP24-1 from four offshore wind developers representing 6,870 MW in total offer capacity. On October 18, 2024, NYSERDA received Offer Pricing for 21 proposals, and Attentive Energy withdrew its 4 proposals. See <https://www.nyserda.ny.gov/All-Programs/Offshore-Wind/Focus-Areas/Offshore-Wind-Solicitations/2024-Solicitation>.

reflected in the Request for Information that NYSERDA released earlier this year.²⁶

In April 2024, the NYISO opened its PPTN solicitation. By June 2024, NYISO received the 28 proposals from four developers in response. Since that time, NYISO staff have been evaluating the proposals and, in parallel, as requested by the Commission, a group of state, local, and federal authorities has been conducting preliminary reviews of the proposals and providing feedback to the NYISO team on issues involving permitting and siting constraints. The NYISO has indicated that it expects to complete its assessment over the second and third quarters of 2025, at which point it will prepare its report and make a project selection recommendation to the NYISO Board.²⁷

On January 20, 2025, as the NYISO and the State agencies were evaluating the transmission proposals, President Trump issued the Memo. Its impacts flowed quickly across the industry. For example, in addition to the events described above, on February 3, 2025, the New Jersey Board of Public Utilities cancelled its pending solicitation for offshore wind resources.²⁸ On February 24, 2025, Vineyard Offshore laid off 50 positions in the United States and Europe.²⁹ On February 26, 2025, the Prysmian Group canceled plans to build a factory in Massachusetts after planning to make undersea cables for the

²⁶ See <https://www.nyserda.ny.gov/All-Programs/Offshore-Wind/Focus-Areas/Offshore-Wind-Solicitations/NY6-Solicitation>.

²⁷ See https://www.nyiso.com/documents/20142/47623996/02a_NYCPPTN_ESP_WG_2024_10_21.pdf.

²⁸ See <https://www.nj.gov/bpu/newsroom/2024/approved/20250203.html>.

²⁹ See <https://www.mvtimes.com/2025/02/24/vineyard-offshore-lays-off-50-employees>.

offshore wind industry.³⁰ In response to the regulatory and political environment shifts following President Trump's inauguration and Memo, RWE AG laid off 73 offshore wind employees in Massachusetts on March 10, 2025.³¹

Closer to New York, the owners of the Beacon Wind project announced the termination of the project's NYSDORA contract on January 25, 2025, and on February 19, 2025, the company withdrew its PSL Article VII application for a certificate to construct the transmission needed to connect its offshore wind turbines with the New York grid.³² Then, on March 14, 2025, the U.S. Environmental Protection Agency (EPA) remanded a Clean Air Act permit previously granted to the Atlantic Shores project, which was planned to be built off the coast of New Jersey.³³ On April 16, 2025, the Bureau of Ocean Energy Management halted work on the fully permitted Empire Wind 1 project, which has been under construction in federal waters

³⁰ See <https://www.reuters.com/business/energy/italys-prysmian-ditches-plan-build-us-plant-offshore-wind-parks-2025-01-21/>.

³¹ See <https://www.bloomberg.com/news/articles/2025-03-10/rwe-cuts-us-offshore-wind-jobs-amid-trump-s-renewables-backlash>.

³² Case 22-T-0294, Application of Beacon Wind LLC for a Certificate of Environmental Compatibility and Public Need for the Construction of Transmission Infrastructure from the Boundary of New York State Territorial Waters to a Point of Interconnection at the Astoria Power Complex in Queens, Letter Withdrawing Application (filed February 19, 2025).

³³ See [https://yosemite.epa.gov/oa/eab_web_docket.nsf/9C7B7CF33923032185258C4D0058F4A7/\\$File/Atlantic%20Shores%20Order%20Granting%20Motion%20for%20Voluntary%20Remand,%20FINAL.pdf](https://yosemite.epa.gov/oa/eab_web_docket.nsf/9C7B7CF33923032185258C4D0058F4A7/$File/Atlantic%20Shores%20Order%20Granting%20Motion%20for%20Voluntary%20Remand,%20FINAL.pdf).

in the New York Bight since June 2024.³⁴ On May 5, 2025, a coalition of states (Coalition), including New York State, sued the Trump administration over its directives to indefinitely pause future federal permitting and shut down wind energy development.³⁵ We note that even if ultimately successful, this litigation does not provide any certainty that generation projects will receive permits and complete construction by 2035, the deadline assumed for this PPTN.

At the present moment, New York has only two offshore wind projects that are under contract with NYSERDA, Empire Wind 1 and Sunrise Wind, each of which secured federal permits under President Joseph Biden's administration. President Trump's memorandum, EPA's remanding of the permit for the Atlantic Shores project, and BOEM's stop work order to Empire Wind suggest that New York State cannot rely on the federal government to support the construction of offshore wind, regardless of project permit status. Under these circumstances, we cannot assume that sufficient offshore wind generation projects will be developed and constructed by 2035 to justify

³⁴ We recognize that this decision was reversed on May 19, 2025, following intensive lobbying efforts by the developer, the Governor, the Danish government, labor unions, and other stakeholders. Subsequently, a coalition of project opponents commenced litigation over the reversal. We reference it here as evidence of the uncertainty that clouds the future of the industry. See, *Protect Our Coast NJ et al. v. United States of America et al.*, D.N.J. Docket No. 25-cv-6890; Complaint, ECF No. 1, available at: <https://fingfx.thomsonreuters.com/gfx/legaldocs/gdpzxnwlbpw/06032025wind.pdf>.

³⁵ See, *State of New York et al. v. Donald Trump, et al.*, D. Mass. Docket No. 1:25-cv-11221, (Coalition Litigation); Complaint, ECF No. 1, available at: <https://ag.ny.gov/sites/default/files/court-filings/state-of-new-york-et-al-v-donald-trump-united-states-department-of-the-interior-complaint-2025.pdf>.

pressing ahead with the selection of transmission infrastructure and incurring the associated costs. In addition, with this uncertainty around wind permitting, we would not expect federal authorities to permit a transmission project planned to eventually connect offshore wind generation.

In 2023, at the time of the PPR Order, the outlook for reaching the 9 GW CLCPA target was promising; the federal government at the time was supportive of offshore wind, there were sufficient lease areas and projects in development, in addition to the projects already procured, to conclude that the capacity of the proposed transmission facilities would be fully utilized, and that the ratepayer commitment was justified. Now, however, lacking any certainty about the development timeline for offshore wind generation, we cannot commit the State's ratepayers to pay for billions of dollars in transmission infrastructure that may sit unutilized for an indeterminate amount of time.

Several commenters suggested that we allow the PPTN process to continue by extending the in-service date, phasing construction, or otherwise modifying the PPTN to maintain progress until a future and more supportive federal administration resumes permitting offshore wind generation. While those approaches might have some initial appeal, we find that they are not the prudent course for ratepayers.

Any of the suggested modifications would require the NYISO to re-start the solicitation process.³⁶ We find that taking such a step would expose ratepayers to too much risk. Without clarity on the future of offshore wind generation development, we cannot know whether the project that would be selected by the NYISO Board based on the need we defined through

³⁶ NYISO OATT, Attachment Y, §31.4.6.7.3.

the PPR Order is the "right" project to serve the State's objectives. A re-start to the process would require us to revisit the design assumptions on which the PPR Order was based, and under the present conditions of uncertainty, we would not know what assumptions to use in determining design or operational parameters for the transmission facility. Among other factors, we would be unable to specify an in-service date, and any cost estimates developed without a reasonably-supported schedule for the work would be highly speculative.

In any event, if we allow the process to continue without modification, the NYISO would be in the position of selecting later this year among projects whose plans and bids were developed for a 2033 in-service date, knowing that procurement and construction would actually be conducted on an indefinitely extended time frame. This would introduce unjustifiable uncertainties into the cost estimates provided to the NYISO for the competitive evaluation, among other things, and would expose ratepayers to excessive risk and significant costs.

We agree with the many commenters who observe that there continues to be a need for both offshore wind supply and related transmission, arising from the CLCPA's target for 9 GW by 2035. However, we must recognize that New York State cannot build offshore wind power in federal waters without federal approval. We also are mindful of the concerns for reliability in New York City cited by several commenters. The current Federal Administration's halt on further offshore wind generation development means we will have to rethink the combination of reliability measures that will provide cost-effective solutions in the future. We fully expect that Staff, the NYISO, and Consolidated Edison Company of New York, Inc., will continue to monitor reliability needs in light of these and other developments and that the existing planning processes will

identify proposed solutions to address them for consideration, as appropriate, by the Commission.

Where the federal government puts insurmountable obstacles in the way of a CLCPA objective, the State's policies will be frustrated and progress necessarily limited to those things that can be accomplished without federal support or cooperation. Burdening the ratepayers of New York State with costs of the magnitude reported by the NYISO -- \$7.9 billion to \$23.9 billion -- without any certainty as to when they will receive the benefits of the offshore wind energy that the CLCPA seeks to secure is unjustifiable.

Our decision to withdraw the PPTN determination, at this time, does not reflect an abandonment of our efforts to reduce carbon emissions in the energy sector. We expect that it is a matter of when, and not whether, offshore wind generation projects will move forward, and we will be ready to move quickly to advance transmission to capture this resource once the federal government makes progress possible. If, for example, the Interior Secretary completes the review directed in the Memo and President Trump lifts the pause on permitting and leasing, we may again find there is sufficient certainty in the development timeline for offshore wind to justify investing in transmission facilities. Recent events, such as those referenced above and the President's most recent Memorandum concerning the phase out of federal tax credits, suggest this outcome is unlikely in the near-term.³⁷ Therefore, we anticipate

³⁷ Ending Market Distorting Subsidies for Unreliable, Foreign Controlled Energy Sources (July 7, 2025), available at: <https://www.whitehouse.gov/presidential-actions/2025/07/ending-market-distorting-subsidies-for-unreliable-foreign%E2%80%91controlled-energy-sources/>.

revisiting transmission needs again and pursuing solutions when circumstances warrant the mobilization of resources.³⁸

In our national history, states have often relied on a strong federal partner to build major infrastructure projects at the scale that New York State's policy objectives require of offshore wind generation and transmission infrastructure. Under our Constitutional dual-sovereign structure, we rely on a steady collaboration with our federal colleagues to achieve transformational goals; our success depends on predictable federal tax policy, siting and permitting policies, and a consistent environment for trade and financing in the global markets. We have seen successful partnerships with the federal government result in era-defining projects such as the Hoover Dam, or in our own State, the massive hydroelectric generating stations operated by the New York Power Authority, which are amongst the largest in the nation. However, given the significant regulatory uncertainty the federal government has created in recent months for development of offshore wind projects, we conclude we do not have such a partner at this moment. Without a federal partner, it would be irresponsible to commit the State's ratepayers to assuming the costs of further funding the major offshore wind transmission infrastructure contemplated in the PPR Order.

For these reasons we withdraw the prior determination of a need for transmission linking offshore wind generation with the New York City grid. We commend the NYISO, DPS Staff, NYSERDA, and the staff of the many other agencies who have been supporting the NYISO's evaluations for the dedication they have shown to this project. We are hopeful that the experience

³⁸ We note that the NYISO OATT allows the Commission to initiate an out-of-cycle public policy transmission planning process. NYISO OATT, Attachment Y, §31.4.1.

gained in this process will benefit the public in the future when we are able to re-start planning for offshore transmission infrastructure and offshore wind generation. The Commission directs DPS Staff to work with the NYISO to gather lessons learned through the Public Policy Transmission Planning Process to date to inform future planning work for offshore wind generation and transmission development.

Indeed, as stated above, the Commission remains committed to the original goals of the PPR Order, while also recognizing that the current model may not be the optimal model to developing offshore wind transmission infrastructure, especially given the uncertainty facing the offshore wind industry and experience gained in developing the NYC PPTN. We direct DPS Staff to construct a path forward for the responsible, cost-effective deployment of transmission and offshore wind generation, incorporating the lessons learned from the NYC PPTN process. DPS Staff is directed to address these issues in the review of Clean Energy Standard (CES) solicitation practices directed by the Commission in the recent CES Biennial Review Order,³⁹ and to explore approaches to planning offshore wind infrastructure that reduce project development risks, promote cost-effective solutions, and maximize reliability and affordability benefits to the State's ratepayers. The CES solicitation review will include stakeholder outreach, including the offshore wind and transmission industries, to gather information that DPS Staff will utilize to develop the required whitepaper that will ultimately be issued for public comment.

In addition, we must continue identifying clean energy generation solutions that will help meet reliability needs in

³⁹ Case 15-E-0302, supra, Order Adopting Clean Energy Standard Biennial Review as Final and Making Other Findings (issued May 15, 2025) (CES Biennial Review Order).

New York City and proceed with ongoing work to identify necessary transmission solutions through the Coordinated Grid Planning Process. Therefore, we direct DPS Staff, in coordination with NYSERDA and the NYISO, to identify what clean energy solutions may be available to incorporate into existing reliability planning processes. Those potential solutions shall be identified in the next Clean Energy Standard Biennial Review, scheduled to be issued in 2026.

CONCLUSION

As discussed herein, the Commission recognizes that the current Federal Administration's halt on offshore wind leasing and permitting negates the need, at this time, for additional transmission facilities to deliver offshore wind generation into Zone J by 2033. The Commission, therefore, withdraws the PPTN previously identified in the PPR Order. Given that the transmission need is withdrawn at this time, the NYISO will cease its consideration of solutions, in accordance with the August 2014 Policy Statement and §31.4.6.7 of Attachment Y of the NYISO OATT.

The Commission orders:

1. There is no longer a transmission need driven by a Public Policy Requirement that requires the New York Independent System Operator, Inc.'s evaluation of potential solutions to deliver the output of offshore wind generating resources to New York City interconnection points, as discussed in the body of this Order.

2. Department of Public Service staff shall include an evaluation of transmission and generation planning for offshore wind infrastructure in its evaluation of existing solicitation

processes utilized under the Clean Energy Standard, as discussed in the body of this Order.

3. Department of Public Service staff, in coordination with the New York State Energy Research and Development Authority and the New York Independent System Operator, Inc., shall identify, in the Clean Energy Standard Biennial Review, available clean energy solutions to incorporate into existing reliability planning processes to meet reliability needs, particularly in New York City, as discussed in the body of this Order.

4. This proceeding is reopened for the purposes of making the determinations discussed in the body of this Order and is thereafter closed.

By the Commission,

(SIGNED)

MICHELLE L. PHILLIPS
Secretary

SUMMARY OF COMMENTS**Alliance for Clean Energy New York and New York Offshore Wind Alliance (together, ACENY-NYOWA)**

ACENY-NYOWA believes that the conditions and justifications that supported identification of the NYC PPTN remain valid. ACENY-NYOWA urges the Commission to allow the NYISO to complete its evaluation of viable and sufficient options and select the most cost-effective or efficient project. ACENY-NYOWA references the 2021 Power Grid Study,¹ the NYISO's 2024 Reliability Needs Assessment (RNA),² and NYSERDA's fifth offshore wind procurement as support for the continued development of offshore wind and related transmission investments. ACENY-NYOWA notes that New York State's Public Policy Transmission Planning Process "is a poster child in the country for the use of competitive development processes for developing new transmission projects."³ ACENY-NYOWA cautions that terminating or delaying the NYC PPTN could affect reliability and delay the development of offshore wind resources and transmission, leading to higher costs to customers and developers. ACENY-NYOWA further states that the need for offshore wind and related transmission has not changed and that no equivalent resources can be developed to decarbonize New York City, particularly in the timeframe established in the State's clean energy mandates.

¹ Executive Summary of Initial Report on the New York Power Grid Study Power Study, January 19, 2021, page 8.

<https://www.nyserda.ny.gov/-/media/Project/Nyserda/Files/Publications/NY-Power-Grid/Executive-Summary.pdf>.

² NYISO 2024 Reliability Needs Assessment, November 19, 2024: page 54. <https://www.nyiso.com/documents/20142/2248793/2024-RNA-Report.pdf>

³ ACENY-NYOWA Comments, p. 4.

Atlantic Shores Offshore Wind (Atlantic Shores)

Atlantic Shores requests that the Commission allow the NYC PPTN to proceed with "slight modifications" to require transmission solutions to have flexible offshore interconnection points to maximize efficiency, improve permitting timelines, and reduce ratepayer costs. Atlantic Shores believes that such flexibility will mitigate the uncertainty about which and where offshore wind generation projects will be built. Atlantic Shores suggests that the Commission direct NYSERDA to give preference to offshore wind projects that utility the NYC PPTN solution to interconnect to Zone J in its next OREC solicitation. In addition, Atlantic Shores recommends that the Commission direct NYSERDA to initiate its NY6 solicitation upon the NYISO Board's selection of the NYC PPTN solution, direct the NYISO to provide developers access to the development details of the selected NYC PPTN solution with confidentiality protections, and direct the NYISO to finalize the offshore interconnection point in the NYC PPTN solution to align with OREC awards.

Atlantic Shores urges the Commission to reaffirm January 1, 2033 as the in-service date for a solution to the NYC PPTN. Atlantic Shores emphasizes the importance of maintaining grid reliability and managing resource adequacy as fossil fuel plants retire and renewable generation expands. Atlantic Shores discusses the NYISO's 2024 RNA and the need for timely development of new transmission infrastructure to ensure that the grid can accommodate the growth of renewable generation and transmit power effectively across regions. Atlantic Shores notes that offshore wind generation provides reliability benefits and is especially well-suited to provide renewable

resources during the winter as we transition toward cleaner energy.

Atlantic Shores recommends that the NYC PPTN process continue to avoid adverse impacts that would undermine grid reliability, hamper economic growth by undermining investor confidence in the State's offshore wind market, increase costs to consumers, cause negative environmental consequences, and delay our clean energy transition.

Avangrid

Avangrid affirms that the NYC PPTN remains valid and that the Commission should not modify or terminate the process. Avangrid states that the demand for renewable energy, particularly offshore wind, remains critical to meeting the State's ambitious climate goals. According to Avangrid, the State's commitment to reducing greenhouse gas emissions and transition to clean energy has only intensified and the NYC PPTN is essential to integrating offshore wind energy into the grid to ensure sustainability and reliability.

Avangrid highlights the importance of developing transmission infrastructure to mitigate development risk for offshore wind, including reducing uncertainties for project timelines, costs, and regulatory approvals. Avangrid believes that a robust transmission network will provide necessary support for offshore wind developers to facilitate efficient and reliable energy delivery and align with the State's goals to accelerate achievement of its renewable energy targets.

Avangrid warns that canceling or delaying implementation of the NYC PPTN solution will put reliability of the grid at risk and require development of an alternative plan, which would necessitate new State climate policies and goals, in addition to new and updated siting and permitting processes for

new power plants. Avangrid references the NYISO's 2024 RNA and its discussion of a 2033 reliability need and interconnection of 7 GW of offshore wind. Avangrid also points to the NYC PPTN as the most efficient way to facilitate the buildout of offshore wind through a secure and resilient supply chain with a single entity coordinating procurement of all components under a unified process.

Beacon Wind LLC (Beacon Wind)

Beacon Wind recommends that the Commission allow the NYISO to continue its work in the PPTN process without modifications or delays. Beacon Wind emphasizes that offshore wind transmission is essential in New York State, noting that the State's regulatory landscape for the NYC PPTN remains unchanged and the technical need for offshore wind has only increased since 2023, as discussed in the NYISO's 2024 RNA and 2023-2043 System & Resource Outlook. Beacon Wind believes that modifying or delaying the PPTN process would result in increased costs and timelines if the process is restarted in the future. Beacon Wind also advises that continued progress on transmission is critical to enable the State to meet its energy targets and maintain its position as an industry leader providing economic benefits and well-paying jobs to New Yorkers.

Beacon Wind supports the proposals that include a connection between the Massachusetts offshore wind lease area and Zone J to provide New York access to additional uncontracted offshore wind leases. Beacon Wind explains that the connection would provide additional value to ratepayers by increasing competition in upcoming New York State offshore wind solicitations, supporting long-term State procurement targets, enabling access to geographically diverse offshore wind leases with higher average wind speeds and different wind profiles

compared to those in the New York Bight, reducing intermittency, better balancing generation, and improving system reliability.

Bronx Chamber of Commerce (Chamber)

The Chamber requests that the Commission decline its opportunity to modify or terminate the NYC PPTN and instead ensure that the process proceeds expeditiously with selection of a transmission solution to deliver offshore wind into New York City. The Chamber believes that offshore wind and the transmission to deliver it is necessary for the State to address climate challenges, meet growing demand, and provide system reliability to homes and businesses. The Chamber points to the NYISO's projections that electric demand will increase by an estimated 50%-90% over the next decade and its identification of a reliability need in 2033. The Chamber believes that offshore wind and transmission must remain a priority to foster economic and workforce development, long-lasting environmental benefits, and support healthy and safe communities.

Citizens Campaign for the Environment (CCE)

Like the Chamber, CCE urges the Commission to decline its opportunity to modify or terminate the NYC PPTN and instead ensure that the process move forward to the timely selection of a transmission solution to deliver offshore wind into New York City. CCE underscores the critical role that offshore wind must play in our energy mix for the State to reach its goal of 70% renewable energy by 2030. CCE notes that New York City is on the front lines of climate change and that offshore wind provides a just transition from fossil fuels to renewable energy downstate. CCE points to the offshore South Fork Wind farm and two additional offshore wind projects that are under construction. CCE characterizes those projects as kickstarting an "offshore wind-ustry" in the State, which it says is expected

to create nearly 7,000 jobs and over \$12 billion in economic benefits to New York State while improving air quality and providing \$1 billion in health benefits to vulnerable communities.⁴ Like the Chamber, CCE believes that offshore wind and transmission projects are needed to combat climate change, ensure system reliability, and meet growing demand.

City of New York (City or NYC)

The City recommends that the Commission stay the course despite the federal pause of permits, approvals, leases, and loans for offshore wind projects.⁵ NYC asserts that it is a matter of when and not if offshore wind is developed to serve the State and City. NYC observes that it continues to grow and will need increased capacity to meet its residents' needs, particularly as the modernization of its buildings and new computing and transportation technologies are driving increased demand for electricity. The City emphasizes that offshore wind is one of the only clean large-scale resources that can be directly interconnected into NYC.

However, to address the federal delay, the City suggests that the Commission consider modifying the PPTN to extend the January 1, 2033 in-service deadline. The City notes that nothing would be gained by requiring the transmission infrastructure to be built years before it is needed and that investing in transmission now will place immediate and unnecessary upward pressure on ratepayer's electric bills. The City suggests that the public interest would be better served by

⁴ CCE Comments, p. 2.

⁵ The City references 90 Fed. Reg. 8363 (Jan. 29, 2025), Temporary Withdrawal of All Areas on the Outer Continental Shelf from Offshore Wind Leasing and Review of the Federal Government's Leasing and Permitting Practices for Wind Projects.

selecting a solution now, directing the developer to pursue siting and other regulatory approvals, and completing its design work, but pause its procurement and construction work until the timeline for development is certain.

The City points to the AC Transmission and Champlain Hudson Power Express project timelines as recent examples of large-scale transmission development taking many years to complete planning, initial development, design, and regulatory steps. Accordingly, the City recommends that the NYC PPTN process move forward to allow the preliminary steps to be taken in a "deliberate, unhurried manner."⁶ The City also posits that the costs of continuing the evaluation process, completing project design, and securing regulatory approvals would be nominal in comparison to the total costs of a selected project. NYC opines that continuing those processes now will position the State to achieve its clean energy policy goals once the federal freeze is lifted without overburdening ratepayers.

Consolidated Edison Company of New York, Inc., and Orange and Rockland Utilities, Inc. (together, Con Edison)

Con Edison recommends that the Commission allow the NYC PPTN to proceed through selection of the most efficient or cost-effective solution. Con Edison emphasizes that the need for offshore and onshore grid coordination is particularly acute in bringing transmission through the New York Harbor where there are cable routing constraints in underwater corridors and the limited and costly real estate available for infrastructure in New York City's dense environment are needed to make offshore wind fully deliverable. Con Edison discusses the flexibility in design that was incorporated into the solutions on which Con

⁶ NYC Comments, p. 4.

Edison collaborated. Con Edison explains that those solutions were designed to serve a flexible array of operational needs such that the buildout of onshore infrastructure protects against risks presented by delays in the PPTN process as "the infrastructure will be ready to meet any growing demands from the transmission system."⁷

Con Edison notes that the State's 9 GW offshore wind goal has not changed. Con Edison cautions that modifying the PPTN would delay implementation of a solution and the timing of NYSERDA's next offshore wind solicitation, which would threaten the State's ability to achieve its offshore wind goal. While it acknowledges the risk of federal permitting delays, Con Edison warns that modifying or terminating the NYC PPTN will send a negative market signal that may hinder future offshore wind development and increase offshore wind costs.

Con Edison Transmission (CET)

CET argues that the NYC PPTN remains and should proceed with the timely selection of a transmission solution. CET asserts that a transmission solution, coupled with the proposed offshore wind energy generation, is necessary to meet future electric demand. CET explains that New York City may shift to a winter-peaking system with the increase in electric vehicles and electrification of heating. CET references the NYISO's System & Resource Outlook Report projections of 50%-90% increased electric demand and New York City's shift toward a winter-peaking system in the next 20 years. CET also points to the NYISO's 2024 RNA, which identified a resource adequacy deficiency in 2033 and 7 GW of offshore wind as a means to resolving the deficiency. In addition, CET agrees with

⁷ Con Edison Comments, p. 7.

NYSERDA's Offshore Wind Cable Corridor Constraints Assessment that the physical and electrical constraints in and surrounding New York City require a coordinated transmission solution such as the NYC PPTN.

CET believes that it would be difficult to restart the NYC PPTN process if it were halted or delayed at this time. CET explains that developers would not be inclined to outlay substantial development expenses and reveal competitive design concepts when there is not a strong expectation that the NYISO would follow through with a selection. CET also warns that delaying the process would lead to higher construction costs, increase uncertainty, and would send a negative signal to offshore wind developers when the State should instead recommit to developing this important resource for customers in the face of uncertainty presented by the federal government's pause of offshore wind development. CET suggests that building out the transmission would increase system reliability, consistent with the recent Executive Order on increasing the nation's energy supply.⁸ In addition, CET notes that the underlying drivers and policy for NYC PPTN remain and may have increased since 2023.

Equinor Wind US LLC (Equinor)

Equinor believes that the conditions and justifications underlying the Commission's identification of the NYC PPTN remain valid today. Equinor expresses support for the NYISO moving forward toward selection of a solution to the PPTN to promote alignment with and support for NYSERDA's offshore wind solicitation schedule. Equinor requests that the Commission encourage collaboration between itself, NYSERDA, and the NYISO

⁸ CET references January 20, 2025 Presidential Executive Order, available at <https://www.whitehouse.gov/presidential-actions/2025/01/declaring-a-national-energy-emergency/>.

to ensure flexibility in siting points of interconnection for offshore wind and consider the total system costs, including generator interconnection costs, in the PPTN solution.

Hitachi Energy USA Inc. (Hitachi)

Hitachi supports New York Transco's comments detailing why the NYC PPTN and the CLCPA's offshore wind mandate as the underlying public policy requirements driving the need still exist. Hitachi states that there are no viable and sufficient non-transmission alternatives to fulfill the transmission need. Hitachi indicates that it has worked with utilities and developers for decades and that developing high voltage direct current (HVDC) projects requires many years and substantial investments, including the commitment of manufacturing and engineering resources by both developers and HVDC technology suppliers. Hitachi explains that such commitments are harder to make when there is less certainty in the market that a project will proceed. Hitachi has seen the offshore wind market gain momentum in the United States over the last few years and warns that any delays or stops and starts of interconnection projects will likely lead to decreased HVDC supplier interest in the market.

LS Power Grid New York Corporation I (LSPG)

LSPG believes that the Commission should confirm that the NYC PPTN continues to exist without modification. However, LSPG recognizes that the Commission may wish to modify the PPTN in response to changes in federal permitting of offshore wind generation. In that case, LSPG suggests phasing the offshore components of selected project to match NYSERDA's offshore wind procurement schedule. For example, LSPG proposes that offshore HVDC facilities be in-service four to eight months before offshore wind generation enters service. LSPG advises that

phasing construction of transmission facilities to match the timing of offshore wind generation would address the risk of delays in federal permitting without further modifications to the transmission need or timeline. LSPG opines that a phased approach would provide flexibility in the event that offshore wind generation is delayed. LSPG recommends that the schedule for onshore upgrades should remain the same as the onshore facilities provide system benefits, including resiliency.

LSPG identifies several reasons for the PPTN to move forward with selection of a proposed project. LSPG notes that the CLCPA mandate of 9 GW offshore wind remains and that the onshore upgrades included in the proposed solutions would make the existing grid more efficient and resilient while reducing the risk and costs for NYSEDA, generators, and ratepayers. LSPG also states that real estate in New York State is scarce and that there is significant risk that the sites identified by PPTN bidders may be redeveloped for other uses if the PPTN process is terminated. In addition, LSPG believes that advancing the NYC PPTN would better position the State to secure necessary equipment in a timeframe to support the CLCPA while demand for such equipment is historically high with limited manufacturing and long lead times.

New York League of Conservation Voters and Citizens Campaign for the Environment (together, NYLCV-CCE)

NYLCV-CCE urges the Commission to proceed with the NYC PPTN process. NYLCV-CCE notes that there has been no change to the underlying conditions for the PPTN and that the NYISO's 2024 RNA reinforced the importance of offshore wind in maintaining grid reliability and resource adequacy. NYLCV-CCE believes that the need for additional transmission facilities has grown more urgent. NYLCV-CCE cautions that delaying the transmission

solution will delay the State's transition to a clean energy economy, increase consumer costs, and hamper New York's ability to meet its renewable energy targets.

New York Transco LLC (Transco)

Transco recommends that the Commission decline its opportunity to modify or terminate the NYC PPTN as the CLCPA's 9 GW offshore wind mandate continues to exist and is driving the need while there are no viable and sufficient non-transmission alternatives to fulfill the need. Transco references several recent publications in support of the conclusion that grid reliability and achievement of clean energy targets are contingent upon a successful NYC PPTN solicitation.⁹ Transco also points to several practical reasons to proceed with the NYC PPTN, including grid reliability and resiliency, customer cost management, the benefits of competitive transmission solicitation, and the State's continued obligation to meet CLCPA renewable energy mandates. Transco believes that continuing with the PPTN process will send a clear and necessary signal that the New York State remains steadfast in its commitment to deploy renewable energy to meet CLCPA targets.

Transco also warns that delaying a solution to the PPTN would have a chilling effect on the public policy transmission planning process in the State and delay interconnection of a generation source that is essential to future grid reliability. In addition, Transco discusses the need for a coordinated transmission solution in the face of physical and electrical constraints in the landfall areas and

⁹ Transco references the NYISO's 2023-2043 System & Resource Outlook, the NYISO's 2024 RNA, and p. 71 of the Power Grid Study available at <https://www.nyserda.ny.gov/-/media/Project/Nyserda/Files/Publications/NY-Power-Grid/full-report-NY-power-grid.pdf>.

onshore points of interconnection for offshore wind generation in New York City and on Long Island.

Transco asserts that the federal freeze of wind projects does not apply to transmission facilities and that the Commission should, therefore, only consider modifying or delaying the NYC PPTN in light of the impacts of the freeze on offshore wind generation. Transco also states that the existing leaseholders in the New York Bight are unaffected by the federal freeze as “[n]othing in [the federal] withdrawal affects rights under existing leases in the withdrawn areas.”¹⁰ Transco believes that the federal pause of all approvals, rights of way, permits, leases, and loans for wind projects will resume once the federal government completes its assessment and review of wind leasing and permitting practices. In addition, Transco suggests that continuing the NYC PPTN would be consistent with other federal actions, including “Declaring a National Energy Emergency” and “Unleashing American Energy.”¹¹

Transco indicates that the transmission solutions it proposed include elements that would provide benefits to the onshore grid, including multi-value substation and transmission facilities that would become part of Con Edison’s system.

¹⁰ Presidential Memorandum, January 20, 2025, available at <https://www.whitehouse.gov/presidential-actions/2025/01/temporary-withdrawal-of-all-areas-on-the-outer-continental-shelf-from-offshore-wind-leasing-and-review-of-the-federal-governments-leasing-and-permitting-practices-for-wind-projects/>.

¹¹ Transco references Declaring a National Energy Emergency January 20, 2025, available at <https://www.whitehouse.gov/presidential-actions/2025/01/declaring-a-national-energy-emergency/> and Unleashing American Energy, January 20, 2025, available at <https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/>.

According to Transco, the ancillary benefits would accrue regardless of the timing of federal permitting. Transco also notes that its own permitting schedule does not include any filings at the federal level until February 2026 with the Bureau of Ocean Energy Management. However, Transco believes that it could delay its initial federal filing until March 2027 while maintaining its schedule to connect three of its four proposed transmission links by January 1, 2033 with the fourth following by the end of 2033.

New York Power Authority (NYPA)

NYPA requests that the Commission decline its opportunity to modify or terminate the NYC PPTN because the need continues to exist. NYPA notes that the CLCPA's requirement of 9 GW offshore wind energy remains and that NYSERDA initiated its fourth and fifth offshore wind solicitations since the Commission issued its NYC PPR Order. NYPA emphasizes that the solution selected through the NYC PPTN will be essential to delivering offshore wind energy in support of the State's decarbonization and renewable energy goals. NYPA also highlights the importance of a coordinated approach to interconnecting into Zone J, including the constrained corridors and waterways leading into New York City.

New York Transmission Owners (NYTOS)¹²

The NYTOS affirm that the NYC PPTN still exists and that continuity of the PPTN is essential to efficient

¹² The NYTOS include Central Hudson Gas & Electric Corp.; Consolidated Edison Company of New York, Inc.; Long Island Power Authority, Niagara Mohawk Power Corporation d/b/a/ National Grid; New York Power Authority; New York State Electric & Gas Corp.; Orange & Rockland Utilities; and Rochester Gas & Electric Company.

achievement of the targets established in the CLCPA, including for 9 GW offshore wind energy. According to the NYTOs, while some features of offshore wind projects under development have changed, the fundamental needs have not and the basis for the PPTN remains the same. The NYTOs believe that the coordinated approach of the NYC PPTN is necessary to facilitate timely connections and reduce costs through economies of scale for transmission to interconnect offshore wind in Zones J and K. The NYTOs express support for continuing the PPTN and proceeding with the procurement process.

Viridon New York Inc. (Viridon)¹³

Viridon urges the Commission to continue the NYC PPTN process as a critical initiative in advancing the State's offshore wind goals cost-effectively while minimizing environmental impacts in accordance with the CLCPA. Viridon believes that the Commission's rationale for the PPTN remains and that recent events have only increased the strategic importance of the PPTN to the State. Viridon posits that the political climate at the federal level is reducing certainty in offshore wind permitting and will likely slow the development of offshore wind generation. However, Viridon points out that the NYC PPTN offers an important strategic advantage in decoupling transmission development from development of offshore wind generation. Viridon believes that proceeding with the NYC PPTN would provide maximum flexibility to align with NYSERDA's offshore wind procurements.

Viridon characterizes the near-term costs of the PPTN as modest in the planning and permitting stage, estimating those costs to be a few hundred million dollars over the first four

¹³ This summary of Viridon's comments only contains information included in the redacted February 3, 2025 filing.

years, which it says represents "as little as 1% of the tens of billions in capital investment that will ultimately be needed to construct at least 4,770 MW of offshore wind and deliver it to New York City."¹⁴ Viridon cautions that hesitating would send a negative market signal and may frustrate the State's ability to reach its long-term renewable energy goals to protect public health. Viridon suggests that proceeding with the NYC PPTN is a no-regrets approach that aligns with CLCPA mandates, builds on progress already made, and prevents delays in reaching offshore wind targets at minimal cost to ratepayers.

¹⁴ Redacted Viridon Comments, p. 3.