

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on November 13, 2025

COMMISSIONERS PRESENT:

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

CASE 20-E-0197 - Proceeding on Motion of the Commission to
Implement Transmission Planning Pursuant to the
Accelerated Renewable Energy Growth and
Community Benefit Act.

ORDER MODIFYING COORDINATED GRID PLANNING PROCESS

(Issued and Effective November 13, 2025)

BY THE COMMISSION:

INTRODUCTION

The Accelerated Renewable Energy Growth and Community Benefit Act (Accelerated Renewables Act) includes, among its various mandates, the requirement to plan for and identify the distribution, local transmission, and bulk system upgrades needed to meet the climate goals established in the Climate Leadership and Community Protection Act (CLCPA).¹ To address these requirements, the Public Service Commission (Commission) established the Coordinated Grid Planning Process (CGPP) to

¹ Chapter 58 of the Laws of 2020, Part JJJ.

serve as a long-term system planning process.² The first cycle of work under the CGPP is underway, with investment proposals expected in early 2026. Through this Order, the Commission adopts modifications to improve the next cycle of the CGPP, in response to recommendations filed by Department of Public Service staff (DPS Staff),³ the Utilities,⁴ and comments filed by stakeholders. This Order also adopts an adjustment to Cycle 1 that will prioritize proposals for the Commission's review.

BACKGROUND

On May 14, 2020, the Commission issued the Initiating Order in this proceeding and sought proposals for a "transparent planning process ... that will identify additional projects on the distribution and local transmission systems that support achievement of CLCPA goals."⁵ On November 2, 2020, in a filing that included a proposed portfolio of transmission investments, the Joint Utilities described their existing system planning processes and proposed some adaptations (the November 2020 Filing).

² Case 20-E-0197, Order Approving a Coordinated Grid Planning Process (issued August 17, 2023) (CGPP Order).

³ DPS Staff filed its recommendations on August 15, 2024, in this proceeding (DPS Staff's Filing).

⁴ The Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation (together, with the Long Island Power Authority (LIPA), the Joint Utilities). The Joint Utilities filed recommendations on June 3, 2024, in this proceeding.

⁵ Case 20-E-0197, Order on Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act (issued May 14, 2020) (Initiating Order), p. 7.

On September 9, 2021, the Commission issued the Phase 2 Order, which found that the November 2020 Filing did not adequately respond to the Commission's call for the development of a coordinated planning process.⁶ The Commission specified that a "properly coordinated" planning process must meet certain minimum objectives, including to: "support all existing grid planning needs and criteria; ... identify upgrades at all levels needed to ensure the timely and cost-effective attainment of CLCPA policy goals; and ... provide accurate and actionable information" to stakeholders and policymakers.⁷ Further, the Commission required the Utilities to "ensure consistency in input data, planning assumptions, planning models, and the planning approaches used by the different planning entities so that the utility-specific plans ... accurately and comparably capture the interdependence of distribution, local transmission, and bulk transmission in the various portions of the State's power grid."⁸

In response, the Joint Utilities filed a proposal for a Coordinated Grid Planning Process on December 17, 2021. Thereafter, over the course of 2022, DPS Staff hosted a series of nine technical conferences during which the Joint Utilities explained the various steps and analyses included in the CGPP proposal and engaged in dialogue with transmission developers and other stakeholders. Later in the year, the Utilities submitted a revised CGPP proposal to the Commission.⁹

⁶ Case 20-E-0197, Order on Local Transmission and Distribution Planning Process and Phase 2 Project Proposals (issued September 9, 2021) (Phase 2 Order).

⁷ Id., p. 19.

⁸ Id., pp. 20-21.

⁹ A corrected version was submitted on January 5, 2023, replacing Figure 5 with a higher-resolution image (CGPP Proposal).

On August 17, 2023, the Commission adopted the CGPP Proposal, with some modifications.¹⁰ The approved CGPP consists of six stages: Stage 1 (Data Collection, Scenario Definition, and Capacity Expansion Modeling), Stage 2 (Network Model Development), Stage 3 (Local Transmission and Distribution Assessment), Stage 4 (Review of Preferred Solutions), Stage 5 (Least Cost Planning Assessment), and Stage 6 (Final Report). Recognizing that the CGPP represented the first coordinated effort for a long-term transmission plan for the State, the Commission's directions included an instruction to the Utilities to file recommendations for reducing the CGPP cycle time from three years to two years.¹¹ The Commission also directed DPS Staff to provide a mid-cycle assessment of the progress of the CGPP and suggestions for process improvements.¹²

On June 3, 2024, the Joint Utilities filed their recommendations for shortening the CGPP cycle time, in response to the CGPP Order.¹³ DPS Staff's assessment was filed on July 15, 2024.

THE FILINGS

The Joint Utilities

In the Joint Utilities' filing, the companies explain that the CGPP was designed to reduce the planning timeline as much as possible by performing the work in overlapping stages. The Joint Utilities caution that hastening the cycle too much might compromise the value of the analyses. However, the Joint Utilities acknowledge that there is merit in aligning the CGPP

¹⁰ Case 20-E-0197, Order Approving a Coordinated Grid Planning Process (issued August 17, 2023) (CGPP Order or the Order).

¹¹ Id., Ordering Clause 8.

¹² Id., Ordering Clause 9.

¹³ Id., Ordering Clause 8.

with other statewide planning analyses to the extent that the information guiding investment decisions for the grid is improved. The Joint Utilities also recommend that, when contemplating changes to the CGPP, the Commission should consider both the lessons that will be learned once the first full cycle of the CGPP is completed, as well as the process changes resulting from implementation of the Federal Energy Regulatory Commission's (FERC's) recently-issued Order No. 1920.¹⁴

The Joint Utilities identify five opportunities to condense the cycle timeline. First, the Joint Utilities suggest that the Commission direct the evaluation of up to four scenarios in Stage 1, but that only up to two sufficiently distinct scenarios move through Stages 2-4. The Joint Utilities explain that two generation buildout scenarios would likely represent a broad range of policy achievement assumptions while saving the effort needed to build power flow databases in Stage 2 and the analysis conducted in Stages 3-4. The Joint Utilities estimate that the approach would save up to four months in the cycle.

Second, the Joint Utilities discuss the possibility of evaluating fewer future planning periods at the completion of planning studies to reduce the complexities of analysis and potentially saving up to two months in the cycle. This proposal would result in the four load conditions being evaluated for two periods (year 10 and year 20) instead of the three periods envisioned in the current cycle (2030, 2035, and 2042). The

¹⁴ See Docket No. RM21-17, Building for the Future Through Electric Regional Transmission Planning and Cost Allocation, Order No. 1920, 187 FERC ¶ 61,068 (2024), and its related subsequent orders, including Order 1920-A, 189 FERC ¶ 61,126 (2024), and Order 1920-B, 191 FERC ¶ 61,026 (2025) (together, Order No. 1920).

Joint Utilities explain that nearer-term planning periods are useful for project prioritization but provide less value for long-term transmission investment decisions.

Next, the Joint Utilities address an option to apply a wider cost estimate range that is "planning grade" quality (up to +200%) in place of the current "rate case quality" standard for Stage 3. The Joint Utilities explain that this approach could save up to four months and achieve greater efficiency by not developing detailed cost estimates for projects that will not be considered in later stages.

The fourth opportunity offered by the Joint Utilities is to shorten the period for the Commission's review of projects and lessons learned before the next cycle. The Joint Utilities acknowledge that some stakeholder engagement and assumption development can begin before the Commission issues its decisions on the prior cycle. However, the Joint Utilities emphasize that it is impractical to start modeling for the next cycle because the projects selected for development and potential process improvements should be incorporated into the future cycle to avoid the need to duplicate work. The Joint Utilities note that reducing this period of regulatory review before starting the next cycle might save up to six months.

Lastly, the Joint Utilities discuss the potential to align the CGPP with the two-year "Outlook" planning process conducted by the New York Independent System Operator, Inc. (NYISO). The Joint Utilities note the challenge in identifying how the NYISO process, which must comply with the FERC Order No. 1920, might align with the CGPP process. However, the Joint Utilities agree that consistency may provide benefits and anticipate using tools and data from other planning processes to inform the CGPP. The Joint Utilities indicate that they explored alignment opportunities with the NYISO, including the

potential to incorporate Stage 1 scenario development within the Outlook.

DPS Staff's Filing

DPS Staff's CGPP Mid-Cycle Assessment includes updates on work completed and identifies opportunities to improve the process for future cycles. DPS Staff's proposals, laid out in detail below, focus on the engagement of the Energy Policy Planning Advisory Council (EPPAC), scenario development, determining conceptual costs of headroom, modeling of dispatchable emission-free resources (DEFERs), support for modeling efforts, and shortening the process timeline.

1. EPPAC Engagements

DPS Staff recommends that EPPAC follow a practice similar to NYISO working groups wherein meeting materials are made available at least three days prior to meetings. DPS Staff also suggests that additional education on the modeling tools used in the CGPP be made available to EPACC members to support the development of appropriate assumptions and data in future cycles. Similarly, the DPS Staff Assessment recommends the development of a granular workplan and schedule for each CGPP cycle that would include areas of expected EPPAC engagement, in order to increase stakeholder visibility, starting at the outset of each cycle.

2. Additional Time for Scenario Development

Stage 1 of the CGPP involves significant discussion, evaluation, and review of potential data sources and assumptions to be used in modeling New York's energy system. Recognizing the complexity and importance of Stage 1, including the potential tradeoffs represented in the choice of inputted assumptions, and in the interest of providing enough time for meaningful stakeholder engagement, DPS Staff recommends extending the time for the sequencing of scenario development.

3. Sub-zonal Conceptual Costs of Headroom

The initial cycle of the CGPP did not include sufficient time for the Utilities to develop granular cost estimates for conceptual local headroom projects. To accommodate this, the Utilities and DPS Staff utilized average local transmission upgrade costs developed as a part of the Scoping Plan with data points based on actual project costs from recent transmission projects in New York. However, the average upgrade cost number was utilized across all zones, muting the variability expected across projects and utilities. DPS Staff recommends that the Utilities develop territory-specific, more granular local transmission upgrade costs in future cycles, noting that the incremental cost of adding new headroom is likely to increase as more headroom is added.

4. Additional DEFR Options

In the Initial Cycle of the CGPP, only one DEFR option per scenario was included, due to uncertainty as to what technologies will be able to serve as DEFRs by 2040. This was to avoid the unintended consequence of causing a delay associated with seeding the model with multiple uncertain resource types, and to remain consistent with the approach used in the Integration Analysis.¹⁵ Originally, DEFRs were to be used in the model as the resource-of-last-resort, and the total quantity and dispatch of DEFRs were to represent the energy and capacity required in the model beyond traditional clean energy strategies. However, the advent of new long-duration storage technologies and advanced nuclear reactors have caused the cost

¹⁵ The Integration Analysis was initially published as part of the New York State Climate Action Council Scoping Plan (December 2022), available at: <https://climate.ny.gov/-/media/project/climate/files/NYS-Climate-Action-Council-Final-Scoping-Plan-2022.pdf>.

and operational characteristics of potential DEFRs to diverge to the point where significant differences may arise in locational generation builds under scenarios that recognize alternate DEFR options. Acknowledging that these different DEFR options could significantly alter model outputs, and to capture potentially important differences, DPS Staff recommends incorporating additional DEFR options into the Cycle 2 modeling.

5. Alternate Arrangements for the Modeling Effort

The DPS Staff Assessment recognizes the complexity and resource-intensity of the CGPP modeling process and notes that the decision to rely on the NYISO for carrying out the capacity expansion and production-cost modeling for CGPP Stages 1 and 5 likely placed a significant burden on NYISO staff, beyond what would typically be expected as a part of the biannual economic planning process. DPS Staff also notes that NYISO staff are bound by their existing tariff to follow certain timelines and process steps during the economic planning process, which do not always align with the precise needs of the CGPP. DPS Staff recommends evaluating alternative pathways for completing capacity expansion and production-cost modeling in Cycle 2 of the CGPP. DPS Staff states that procuring such support should be done sufficiently ahead of the start of Cycle 2 so that model selection and set up would be completed by that time.

6. Shortening the Process to Two Years

The DPS Staff Assessment recommends the CGPP timeline be shortened to two years, noting that a shorter timeline would allow for more flexibility for the recommendations to evolve with the changing energy system. DPS Staff states that the current three-year cycle is less responsive to rapidly changing load forecasts and resource costs.

PUBLIC NOTICE

On August 7, 2024, Notices of Proposed Rule Making were published in the State Register regarding the recommendations filed by the Joint Utilities on June 3, 2024 [SAPA No. 20-E-0197SP20] and the recommendations filed by DPS Staff on July 15, 2024 [SAPA No. 20-E-0197SP21]. In addition, on July 24, 2024, the Secretary to the Commission issued a Notice Seeking Comments on both filings. The time for submission of comments pursuant to these Notices expired on October 7, 2024.

Comments on the filings were received from the Alliance for Clean Energy New York (ACE NY), Earthjustice, EDF Renewables (EDFR), Independent Power Producers of New York (IPPNY), the Joint Utilities, NextEra Energy Transmission New York (NEETNY), the New York Power Authority (NYPA), and the Working for Advanced Transmission Technologies Coalition (WATT). The following Comments section is organized by the suggestions in the Mid-Cycle Assessment, while a more detailed summary of comments, organized by stakeholder, can be found in the Appendix.

COMMENTS

EPPAC Engagement

ACE NY, EDFR, IPPNY, Joint Utilities, NEETNY, and NYPA submitted comments supporting the implementation of increased EPPAC engagement. These stakeholders encourage the timely sharing of relevant documents, data, and information with EPPAC members and propose further transparency, increased and regular touchpoints with EPPAC members, and thorough documentation of EPPAC meetings and discussions. WATT suggests that additional members should be added to the EPPAC to provide stakeholder feedback specific to transmission technologies.

Additional Time for Scenario Development

ACE NY, the Joint Utilities, and NEETNY support DPS Staff's proposal to provide additional time for Stage 1 capacity expansion Scenario development. These stakeholders note that Cycle 1 demonstrated that scenario development requires ample time and that as much time as possible should be afforded to accommodate the complex and in-depth discussion it requires.

Sub-zonal Conceptual Costs of Headroom

ACE NY, EDFR, IPPNY, and the Joint Utilities support DPS Staff's proposal that the Utilities develop territory-specific transmission upgrade costs in future cycles. In particular, the Joint Utilities agree that there is value in having improved estimates on which to base project cost assumption, as headroom values influence how much renewables can and should be added in each zone.

Additional DEFR Options

ACE NY and IPPNY support DPS Staff's proposal to include additional DEFR options in future capacity expansion model runs. ACE NY's support is accompanied by the recommendation to include long duration storage. ACE NY also emphasizes that these technologies should be modeled according to how feasibly they can be used with the software to run the capacity expansion model.

EarthJustice submitted comments urging that scenarios that rely on the future conversion of existing peaker plants to burn hydrogen should not be run because of the injustices that such an action would perpetuate.

Alternate Arrangements for the Modeling Effort

ACE NY, EDFR, IPPNY, the Joint Utilities, and NEETNY submitted comments recommending that NYISO remain as the preferred choice for the modeling effort for the CGPP. Many of these stakeholders reiterate DPS Staff's statement that the

NYISO team has "unmatched expertise in New York's electric transmission system."¹⁶ The commenters also emphasize the increased coordination in datasets, tools, and procedures across various New York planning processes that are preserved by maintaining NYISO's role in the CGPP.

Shortening the Process to Two Years

ACE NY, EDFR, IPPNY, NEETNY, and NYPA submitted comments in support of DPS Staff's proposal to shorten the CGPP process from three to two years. They are in favor of receiving and incorporating more timely updates of various underlying assumptions, noting especially the rapid transformation of the grid as technology progresses and upgrades are rolled out.

The Joint Utilities submitted comments that the CGPP cycle should remain as a three-year process, arguing that shortening the cycle would increase the risk of raising costs to ratepayers and compromise the precision by which conclusions and recommendations are reached in each cycle. The Joint Utilities also caution that rushed and insufficient analysis could result in misplaced or unnecessary project development.

LEGAL AUTHORITY

The Accelerated Renewables Act requires the Commission and Department of Public Service to take action to ensure that renewable energy can be efficiently and cost-effectively injected into the State's transmission and distribution system for delivery to regions of the state where it is needed.¹⁷ The Accelerated Renewables Act further requires the Commission to develop plans that "provide for the timely development of local

¹⁶ DPS Staff Mid-Cycle Assessment, p. 9.

¹⁷ Accelerated Renewables Act §2(2)(b).

transmission and distribution upgrades" by the state's regulated utilities and LIPA.¹⁸

In addition, the Public Service Law (PSL) provides the Commission with broad authority to direct actions to ensure that energy supplies and transmission resources are adequate to meet demand in a manner that is protective of the environment. In particular, PSL §4(1) expressly imbues the Commission with "all powers necessary or proper to enable [the Commission] to carry out the purposes of [the PSL]" which include, without limitation, the provision of safe and adequate service at just and reasonable rates,¹⁹ environmental stewardship, and the conservation of resources.²⁰ Further, PSL §5(1) provides that the "jurisdiction, supervision, powers and duties" of the Commission extend to the "manufacture, conveying, transportation, sale or distribution of ... electricity." Under PSL §5(2), the Commission is required 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."

Additionally, PSL §65(1) grants the Commission authority to ensure that "every electric corporation and every

¹⁸ Id., §2(3).

¹⁹ See Int'l Ry. Co. v. Pub. Serv. Comm'n, 264 A.D. 506, 510 (1942).

²⁰ PSL §5(2); see also Consolidated Edison Co. of N.Y., Inc. v. Pub. Serv. Comm'n, 47 N.Y.2d 94 (1979) (overturned on other grounds) (describing the broad delegation of authority to the Commission and the Legislature's unqualified recognition of the importance of environmental stewardship and resource conservation in amending the PSL to include §5).

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 has further 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." The actions taken in this Order fall within the scope of this authority.

DISCUSSION

We have considered the DPS Staff Assessment, the stakeholder comments, and the experience gained during the course of the first cycle of the CGPP, and we agree that modifications to the process will improve it. We also recognize and address FERC's recent directives concerning long-term planning in Order No. 1920, which embodies objectives that we view as consistent with our goals for the CGPP.²¹ As the Commission has stated before, the overarching purpose of the CGPP is to provide the Commission with a wholistic view of grid infrastructure needs at all levels of the system, in order for the Commission to make long-term investments that are in the

²¹ See Order No. 1920.

ratepayers' interest. With this in mind, the Commission directs the following modifications be made to the process.

Stakeholder Engagement

As noted in numerous recent Commission actions, including the CGPP Order, stakeholder input is an essential component to the planning process. To this end, the CGPP Order directed the creation of the EPPAC, comprised of external parties, including those with transmission planning expertise and those representing environmental justice priorities.

The Commission expresses its appreciation to the EPPAC members for their engagement in the process, which has represented a significant commitment of their time. This has included dozens of hours of meetings, not including time to review results and develop recommendations between touch points. The feedback has been valuable to DPS Staff and the Utilities. At the same time, we agree with commenters that the EPPAC process can be improved. While we do not accept all of the suggestions submitted on this topic, we believe more certainty as to the EPPAC work schedule and clearer requirements for information sharing will be beneficial to all parties. To that end, the following directives seek to make it easier for EPPAC members to provide their input.²²

Before commencing a new cycle of the CGPP, the Joint Utilities, in consultation with DPS Staff, will develop a detailed work schedule that will specify the activities to be undertaken, the proposed dates for EPPAC meetings, and the expected deliverables over the entirety of the new cycle. The Joint Utilities shall present this work schedule to all interested stakeholders prior to the commencement of the next

²² These directives are additional to our prior requirements. The communications and transparency practices that the parties have followed in Cycle 1 should continue, with the enhancements included in this Order.

cycle, at the DPS Staff-convened conference discussed below. The Utilities will also publish this work schedule on the CGPP website, which the Joint Utilities will maintain for the posting of ongoing updates and results from the various CGPP Stages. Additionally, over the course of each cycle, the Utilities shall provide two-weeks advance notice of all EPPAC meetings and all CGPP technical conferences. Similarly, in future cycles, the Utilities shall observe a three-day advance notice requirement for posting materials that will be considered at an EPPAC meeting or a technical conference, such as modeling results or analysis, as well as an agenda for the meeting. These recommendations are supported by DPS Staff and many commenters.

Commenters also suggested various documentation-intensive approaches to the stakeholder process. For example, EDFR recommends a "more thorough documentation of the EPPAC discussions and of the CGPP progress ... with drafting of meeting summaries, as well as of key decisions made and the manner in which these decisions were made, of agreed-upon action items or open items ... would be a more effective tool to stay abreast of the latest CGPP developments while enabling documenting of key decisions and action items within each CGPP stage."²³ NEETNY suggests that process improvements could "include a more structured approach to documentation, with detailed meeting summaries, documented key decisions, a tracking of action items from EPPAC meetings, [and] prioritizing written documentation over video recordings."²⁴ Several EPPAC members advised that the Joint Utilities should be required to respond specifically to stakeholder proposals, identifying which were accepted and the reasons for rejecting others.

²³ EDFR Comments, p. 2.

²⁴ NEETNY Comments, p. 4.

We see advantages and disadvantages to adding such requirements to the EPPAC process. The primary value of stakeholder engagement in this case is the opportunity for the planning entities - here, the Utilities - to gather potentially useful insights and material information that might otherwise be overlooked. To accomplish that goal, stakeholders must have information about the planners' work, including models used, key assumptions, and data sources. Stakeholders must also have a good understanding of the planning process and how study inputs relate to outcomes, to keep the focus of the interaction on relevant topics.²⁵ However, stakeholder engagement must not become a source of delay.

We note that the EPPAC is not designed to serve as an open public engagement forum. The formal notice and comment period ensures there will be broad public review and input on the results of the planning effort. In contrast, the EPPAC process is intended to bring relevant sector representatives with experience in electric system planning to provide informed feedback to the Utilities' planning experts. It is essential, given the tight timelines discussed further in this Order, that the EPPAC functions within the schedules set for it. For this reason, we reiterate the Commission's prior statement that the EPPAC should follow the model of the existing Interconnection Technical Working Group, whose membership and participation are limited and targeted toward subject matter experts, while meetings are open to all interested listeners.²⁶ These

²⁵ The Commission specified in the CGPP Order that EPPAC members must have experience with transmission planning to ensure a robust and efficient process, and the Commission continues to view such experience as a key factor in determining EPPAC membership.

²⁶ CGPP Order, pp. 22, 39.

guidelines for active participation promote efficient and effective communication and collaboration within the meetings.

The EPPAC must support the planning process and operate efficiently to ensure that this critical work proceeds on schedule. With one exception, we do not find that requiring extensive documentation of EPPAC discussions is necessary to ensure that members' contributions are considered, particularly since EPPAC meetings are recorded and available for review by any interested member or stakeholder. However, we do find that a requirement to identify the EPPAC suggestions that the Utilities decide to adopt or integrate into the work would provide useful clarification and focus as the work progresses. We therefore direct the Utilities, in consultation with LIPA, to post a concise summary on the EPPAC website of any EPPAC member suggestions that will be incorporated into the process after each EPPAC meeting.

We further find that the administration of the EPPAC process is a time-consuming effort that has been largely borne by DPS Staff. We hold that DPS Staff has a key role, which includes resolving concerns raised in the process, providing general guidance, and reviewing membership applications against the standards the Commission has set, but we do not believe DPS Staff should be responsible for coordinating meeting dates, managing communications, distributing agendas, information, and results, or maintaining the EPPAC website. These purely administrative tasks are more appropriately undertaken by the Joint Utilities, either themselves or through a consultant experienced with similar stakeholder processes. Thus, we direct the Utilities to assume responsibility for managing the EPPAC process and communications within the EPPAC, in consultation with LIPA and DPS Staff, and to provide a web portal for EPPAC members and the public to find information on the process,

including meeting agendas and materials.²⁷ In this effort, the Joint Utilities are encouraged to review existing stakeholder webpages maintained for other proceedings, such as NYISO processes, as well as webpages managed by DPS Staff.

We also believe that broader outreach - beyond the EPPAC - to inform additional stakeholders would increase the public's understanding of the process. To this end, we direct DPS Staff to convene the Utilities, EPPAC members, and any other interested stakeholders, as soon as practical after the completion of a CGPP cycle, to provide, in a public meeting, an overview of the planning process, the models to be used for the next cycle, preview expectations, review the Joint Utilities' work schedule prepared pursuant to this Order, and discuss any new procedures applicable to the new cycle.

To further improve stakeholder engagement with the CGPP, the Utilities, in consultation with LIPA and DPS Staff, are directed to develop a resource for interested parties providing a detailed outline of the CGPP cycle. This "Cycle Map" should describe the role of modeling in the process, provide a breakdown of key information on the CGPP Stages, identify the anticipated inputs and outputs of each stage, and identify the opportunities for stakeholder engagement within each stage. We direct the Utilities, in consultation with LIPA, to publish this guide on the CGPP website prior to the commencement of Cycle 2 and to revise it as necessary in the future to ensure it accurately reflects the process.

Alternate Arrangements for the Modeling Effort

Managing the capacity expansion and production cost modeling for the CGPP is a complex and labor-intensive effort.

²⁷ This portal may be combined with the CGPP website referenced above, so that general information about the process as well as materials specific to the EPPAC can be found easily.

In the Mid-Cycle Assessment, DPS Staff recommends evaluating additional pathways for completing this work in Cycle 2 of the CGPP. Based on the comments from stakeholders and the long-term need for collaboration, we direct DPS Staff and the Utilities, in consultation with LIPA, to pursue a continued partnership with the NYISO for these modeling efforts, with the modifications discussed in this Order, while taking any necessary steps to pursue alternate arrangements in the event that the NYISO is unable to perform the full set of required duties or meet the schedule for Cycle 2. Such alternate arrangements may include retention of consulting services.

Sub-zonal Conceptual Costs of Headroom

As noted above, Stage 1 of the CGPP involves collecting data, establishing key modeling assumptions, defining scenarios, and completing the initial capacity expansion planning analysis that guides the subsequent study process and assessment of potential solutions. In the CGPP Order, the Commission directed the Utilities to develop conceptual cost estimates for upgrading local transmission and distribution beyond the existing local headroom and, in coordination with DPS Staff, determine how to incorporate the conceptual cost estimates into the capacity expansion model.²⁸ This data allows the model to select those local projects that are necessary to enable incremental generation beyond what may be accommodated by existing headroom.

For Cycle 1, the Utilities relied on averaged headroom costs, which were not specific to any given utility and were not aligned with the generation representation within the model. Furthermore, the model did not limit the amount of headroom available in any zone or year. DPS Staff advises that the

²⁸ As used in this Order, "headroom" is the ability of the electric system to accommodate new generation resources.

outcome of these assumptions in the work performed to date has been the model's selection of excessive headroom in numerous areas, potentially beyond feasible quantities, and the identification of headroom for the use of generation projects in areas where no such headroom actually exists. This issue has been addressed through manual efforts by the Utilities to identify areas where modeled results do not reflect realistic outcomes, so that the issue does not propagate through the remaining stages of the planning process.

We accept DPS Staff's recommendation to develop a new, more granular representation of headroom in the capacity expansion model for Cycle 2 and beyond. Importantly, this applies to both existing headroom, and the need to seed the model with tranches of new headroom on a similarly granular basis, complete with a realistic representation of the location and availability over time of the various tranches. The Commission directs the Utilities, in consultation with LIPA, to expand upon their existing headroom calculation process to develop tranches of headroom in each utility district within their headroom methodology, corresponding to the various headroom projects that may be implemented in a given area in the time horizon of the model. This will enable the NYISO, assuming it is serving as the modeling lead for this process, to implement headroom in the capacity expansion model used in Stage 1 on a utility-district basis, aligned with geographically granular potential generation in future cycles. The Joint Utilities shall develop one or more tranches of conceptual local upgrades for each utility district and provide estimates of the cost (\$/MW) and the estimated size (MW) of each upgrade in time for the beginning of Stage 1 of each CGPP Cycle.

To support the modeling effort, DPS Staff should work with the New York State Energy Research and Development

Authority (NYSERDA) to provide generation supply curve information on either a geographical or electrical basis that matches utility district mapping, thus allowing the data to be combined in the capacity expansion model by the NYISO. This process will improve the realism in the model to better determine how resource development impacts local headroom. As articulated by EDFR in its comments, "the more refined estimates of local headroom and cost of headroom are by zone and magnitude, the more reliable these inputs are to support development and deployment of a cost-effective CGPP transmission portfolio that optimizes future transmission and generation expansion."²⁹

This action – integrating the granular supply curve data with associated headroom capacity in the model – is expected to be one of the key innovations of future CGPP cycles, allowing the process to develop the most realistic resource and infrastructure buildout to date, and accelerating future stages of the process. Also, since the headroom selected by the model in this case can be mapped to real potential projects, any nodal modeling completed within the CGPP may leverage the headroom project information to enable solution development and system testing, minimizing the risk of model infeasibility.

Additional DEFR Options

One of the key outputs informed by the CGPP modeling is the mix of clean firm resources, or DEFRs, required to maintain reliability in a decarbonized energy system. In the Mid-Cycle Assessment, DPS Staff acknowledges the advent of new long-duration storage technologies and advanced nuclear generators, suggesting that the cost and operational characteristics of potential DEFRs have diverged to the point

²⁹ EDFR Comments, p. 3.

where there may be significant differences in locational generation builds under scenarios that recognize alternate DEFR options. DPS Staff therefore proposed evaluating the possibility of incorporating additional DEFR options into the CGPP modeling in Cycle 2 to capture these potential differences. ACE NY supports DPS Staff's proposal and "recommends that these choices include long duration storage and decisions to be made also based on feasibility of having these technologies modeled in the software of choice for capacity expansion modeling."³⁰ We agree and direct the Utilities, in consultation with LIPA and DPS Staff, to work with the NYISO to implement additional DEFR options into the CGPP modeling work, with appropriate constraints on cost, availability, and siting. Future CGPP cycles should also consider other opportunities to examine resource adequacy within the CGPP and must perform extreme weather sensitivities on the capacity expansion model to stress model outputs and determine how the future system may react to different system conditions.

In the time since CGPP Stage 1 commenced, we note that the Electric Power Research Institute (EPRI), in consultation with NYSERDA, has carried out a technoeconomic assessment of various technologies that may help to meet grid reliability needs by 2040.³¹ As a more wholistic review of DEFR options in the model will enable the CGPP to identify the optimal mix of clean firm resources in different regions of the State, the Commission directs the Utilities, in consultation with LIPA, to leverage the results of EPRI's assessment in developing future capacity expansion modeling inputs for DEFR options. DPS Staff

³⁰ ACE NY Comments, p. 7.

³¹ Case 15-E-0302, Large-Scale Renewable Energy Program and a Clean Energy Standard, Zero by 40 Technoeconomic Assessment (October 22, 2025).

should continue to work with the NYISO to improve the model, including an effort to increase the granularity of energy storage and long-duration storage modeling, and to further evaluate chronology to develop more granular time slices within representative days.

Bulk Transmission Needs

The CGPP's capacity expansion modeling simulations reflect existing limits on the bulk transmission system's capability to transfer power between New York Control Area zones. Recognizing that bulk transmission transfer limits may constrain a potentially more economic build-out of renewable generation, storage, and/or emissions-free generation, the process provides for a sensitivity analysis to evaluate the effect of relaxing a bulk transfer limit. For Cycle 1, DPS Staff was required by the CGPP Order to consult with the NYISO and the EPPAC to determine whether the results of the relaxation indicate that an assessment of conceptual bulk solutions may be warranted. DPS Staff and NYSERDA were directed to engage a consultant to identify conceptual bulk solutions and high-level estimates of their possible system benefits and costs. This process, while technically workable, given the limitations of the modeling work in CGPP Cycle 1, has proven difficult without additional guidance from the model on the potential timing and magnitude of bulk needs.

We therefore direct DPS Staff, in consultation with NYSERDA and the NYISO, to prepare conceptual bulk transmission costs for use in the capacity expansion model in Cycle 2 to optimize increases to interzonal transfer limits. This will provide additional detail on potentially cost-effective bulk transmission expansion opportunities. NEETNY, which advocates for greater clarity on bulk conceptual analysis, aptly illustrates the benefit of undertaking this task, stating "[i]f

no conceptual bulk solutions are studied, then no comparison between bulk and local solutions can be made, and this potential value will be ignored.”³²

Production Cost Modeling

We agree with recommendations offered on the addition of production cost modeling to the CGPP. Production cost modeling will assist with optimizing scenario development and improve both the accuracy and realism of the capacity expansion model outputs before their use in the local modeling conducted in Stages 2-4. Moreover, production cost modeling would allow the study team to identify specific power system challenges, thereby narrowing the set of power flow cases that may be necessary in later stages and thus yield more precise results. This proposal is supported by a majority of stakeholders in their submitted comments. In particular, NYPA states that “[production cost modeling] will allow the Commission to consider a more detailed analysis of grid operations and deliverability benefits of potential projects to determine, on an informed basis, the optimal, cost-effective portfolio of investments to meet local and bulk system needs in support of the CLCPA mandates.”³³ The Commission therefore directs the Utilities, in consultation with LIPA, to incorporate production cost modeling into Stage 1, following capacity expansion modeling.

Coordination with FERC Rulemaking

Since the Initiating Order came into effect and Cycle 1 of the CGPP began, the FERC has adopted Order No. 1920, requiring all transmission planning regions in the United States

³² NEETNY Comments, p. 8.

³³ NYPA Comments, p. 8.

to establish long-term transmission planning processes.³⁴ Those directives are rooted in concerns for identifying and addressing evolving system needs that this Commission shares with the FERC. The Joint Utilities appropriately highlighted in their comments in this proceeding the potential impacts of having two incongruous processes, writing, "CGPP and 1920 processes require temporal and mechanical process alignment given both are intended to be comprehensive planning processes aimed at achieving clean energy policy."³⁵

We view the federal orders, as they apply to the single-state NYISO, as complementing and enhancing the process we established in the CGPP Order. We believe that significant ratepayer benefits can be gained by properly aligning the two processes. With this in mind, we direct DPS Staff and the Utilities, in consultation with LIPA, to work with the NYISO and ensure effective process alignment between CGPP and the future Order No. 1920 process.³⁶ Ideally, the two processes should be combined to enable stakeholders to follow a single process for the State's planning efforts and to ensure the models, data, and methods are shared between the processes so the bulk and local transmission planning evaluations are properly coordinated.

We recognize that the specifics of the NYISO's obligations under the FERC orders, including details as to the coordination of CGPP and the NYISO process, will be set through the FERC compliance process at a future date. Nor can we

³⁴ See Order No. 1920.

³⁵ Joint Utilities Comments, p. 6.

³⁶ We understand that the NYISO must make its compliance filing to meet all the requirements of Order No. 1920, except those related to interregional transmission coordination, by April 30, 2026. The first cycle under a FERC-approved process would begin thereafter, most likely after our review of the results of CGPP Cycle 1.

predict when the NYISO will begin implementing its Order No. 1920 tariff. DPS Staff advises that Cycle 2 of the CGPP will be underway in late 2026, following Commission action on the Cycle 1 portfolio. This timeframe might or might not overlap with the start of the NYISO's first Order No. 1920 study process.

To solve for these uncertainties, we authorize DPS Staff to adjust CGPP deadlines for Cycle 2, as necessary. In the event that the NYISO begins implementing its Order No. 1920 tariff in 2026, DPS Staff shall schedule the start of CGPP Cycle 2 so as to achieve optimal coordination with the NYISO. If the NYISO does not implement its tariff until later, DPS Staff shall consider whether additional delay is appropriate or whether commencing CGPP Cycle 2 activities can be reconciled with a later NYISO start without jeopardizing important interactions between the processes.

Of course, while we authorize these measures to align CGPP work with the new NYISO tariff, the NYISO could also take steps to ensure a coordinated start to the integrated process. We suggest that the NYISO seek from the FERC, in its compliance filing, similar authorization to schedule the start of its Order No. 1920 process with the ongoing CGPP.

Improved Siting Methodology

Stakeholder comments express a desire for increased transparency in the Utilities' siting methodology utilized in developing nodal models and an adjustment to the steps outlined by the Joint Utilities. NEETNY also notes that the Utilities' current Siting Methodology includes assumptions that may lead to higher costs to ratepayers. They warn that "[t]he [Joint Utilities'] overly simplified approach may lead to unrealistic projections of generation distribution and potentially underestimate the need for transmission upgrades or new bulk

transmission solutions.”³⁷ We share these concerns and therefore require the Utilities to ensure that an appropriate methodology for nodal model setup is developed and utilized in future planning cycles. This could include revising the existing Utilities’ siting methodology or leveraging the publicly available siting methodology developed by the NYISO in their stakeholder process. We direct the Utilities, in consultation with LIPA, to present their selected methodology, after consultation with DPS Staff, at the DPS Staff-convened technical conference discussed above, prior to the commencement of each CGPP cycle.

Reducing the Process Timeline to Two Years

In the Mid-Cycle Assessment, DPS Staff recommends that the CGPP timeline be shortened to two years, noting that a shorter timeline would allow more flexibility for recommendations to evolve with the rapidly changing energy system. This recommendation took into consideration that many stakeholders raised concerns with the proposed three-year cycle time for the CGPP. However, we share the concerns expressed by the Joint Utilities about the overall credibility of the process, one that will potentially anchor billions in ratepayer investment over the next decades.

We recognize that transmission development and construction can take seven to ten years for any project. We also understand that our planning process must be efficient to identify transmission investments in time to support CLCPA targets. However, we acknowledge, as stated by the Joint Utilities in their comments, that “[d]irecting the complex CGPP analyses to be completed in two years would compromise the value and precision of conclusions and recommendations reached in each

³⁷ NEETNY Comments, p. 10.

CGPP cycle and would place significant risk of unnecessary costs on customers throughout New York.”³⁸ Through our actions on stakeholder engagement, headroom assessment, and phasing the rate case quality designs, we have taken steps in this Order to streamline the CGPP. Other actions seek to improve the transparency, granularity, and quality of the CGPP, particularly impacting the early stages of the process, which we expect will lead to a deeper understanding of likely system needs. In sum, we do not believe we can shorten the process substantially without compromising the results. Therefore, we do not adopt DPS Staff’s recommendation to shorten the process timeline to two years. We will continue to require the Utilities to plan and conduct their work so that proposed transmission investments are presented to the Commission on a three-year cycle.

Cycle 1 Final Proposal Development

In the CGPP Order, the Utilities were tasked with developing rate case quality proposals for any upgrades identified through the work completed in Stages 1-4. These projects would then be entered into the Stage 5 capacity expansion modeling to allow the model to select the optimal mix of projects, informing the development of a final portfolio of projects for the Stage 6 Report. Unfortunately, DPS Staff advises that this process, as originally designed, would lead to significant efforts and time expended in estimating projects that are subsequently rejected by the model, as discussed in the Joint Utilities’ Filing.

Given the time-consuming nature of developing rate case quality project proposals and the possibility that the Commission may reject a significant number of potential projects, we authorize the Utilities to phase the development of

³⁸ Joint Utilities Comments, p. 2.

cost estimates, in the current CGPP cycle, as follows. We require the Utilities to develop potential projects arising from the modeling in Stages 1-4 to a level that allows them to seed the Stage 5 model with cost and MW sizing information for local headroom projects. We will require rate case quality designs only for those projects that are selected as part of the final optimized portfolio in Stage 5 and are deemed, in consultation with DPS Staff, to qualify for inclusion in the final report. To the extent the Utilities may require additional time to address this requirement, we authorize the Secretary to consider any request by the Utilities for an extension of process deadlines, in light of our determination that phasing of the rate case quality cost estimates is appropriate.

In future CGPP cycles, we direct the Utilities, in consultation with LIPA, to follow a two-step process for developing project proposals. First, upon completion of the Stage 1 modeling, which will present the optimized portfolio of local headroom projects selected by the model, the Utilities, in consultation with LIPA, are directed to develop high-level cost estimates, project sizes, and development timelines for the upgrades associated with local headroom increases identified in the Stage 1 modeling. The Utilities shall utilize any additional data gleaned from production cost modeling, as described above, and complete any additional local modeling and synergy analyses as necessary in Stages 2-4 to develop an understanding of the specific local system needs. The Utilities shall provide these high-level estimates for all upgrades in the report delivered at the end of the cycle.

Second, we require the Utilities to work with DPS Staff and the NYISO to prioritize those identified upgrades that are likely to provide the most value to ratepayers. The Utilities shall provide rate case quality cost estimates for

those upgrades that DPS Staff agrees should be prioritized, as well as development timelines and other information pertinent to the investment decision, in the final report.

CLCPA and Environmental Compliance

Consistent with CLPCA §7(2), the Commission finds that the actions taken herein will not interfere with the attainment of the statewide greenhouse gas (GHG) emission limits established under the CLCPA. The CGPP process improvements approved in this Order will assist in identifying the electric transmission and distribution facilities needed to facilitate the delivery of clean energy, including renewable resources, throughout New York State.³⁹ Accordingly, the actions taken in this Order will aid in the attainment of statewide GHG emissions limits.

The Commission also finds that approval of the CGPP process improvements will not disproportionately burden disadvantaged communities, consistent with CLCPA §7(3).⁴⁰ The approval of the CGPP modifications herein simply implements improvements to the planning process and does not involve the selection of any facilities.

³⁹ Section 7(2) of the CLCPA requires that State agencies, in considering and issuing permits, licenses, and other administrative approvals and decisions, "consider whether such decisions are inconsistent with or will interfere with the attainment of the statewide [GHG] emissions limits" established under Article 75 of the Environmental Conservation Law (ECL) and, if so, provide "justification as to why such limits/criteria may not be met, and identify alternatives or [GHG] mitigation measures to be required where a project is located."

⁴⁰ Section 7(3) of the CLCPA requires that State agencies, in considering and issuing permits, licenses, and other administrative approvals and decisions, "shall not disproportionately burden disadvantaged communities" as identified pursuant to ECL §75-0101(5).

The Commission also notes that the action herein relates to an "studies and preliminary planning ... necessary to the formulation of a proposal for action, provided those activities do not commit the agency to commence, engage in or approve such action," and therefore constitutes a Type II action under the State Environmental Quality Review Act (SEQRA).⁴¹ Accordingly, the action is not subject to review under SEQRA.

CONCLUSION

For the reasons discussed herein, the Commission adopts modifications to improve the CGPP and refine its results. These improvements will assist the Commission with obtaining a wholistic view of grid infrastructure needs at all levels of the system and ensuring that future investment determinations are in the public interest and protective of ratepayers.

The Commission orders:

1. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority and develop, publish, and present a detailed work schedule and cycle map prior to commencing each new cycle of the Coordinated Grid Planning Process, as discussed in the body of this Order.

2. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and

⁴¹ See 6 NYCRR §617.5(c)(27).

Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority in administering the Energy Policy Planning Advisory Council, and provide the advanced notice, agendas, materials, and summaries related to meetings of the Energy Policy Planning Advisory Council, as discussed in the body of this Order.

3. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority and assume responsibility for managing the Energy Policy Planning Advisory Council and website for the Coordinated Grid Planning Process, in consultation with Department of Public Service staff, as discussed in the body of this Order.

4. Department of Public Service staff shall convene the Utilities, members of the Energy Policy Planning Advisory Council, and any other interested stakeholder after the completion of each Coordinated Grid Planning Process cycle to provide an overview of the process, the models to be used for the next cycle, and review the work schedule and procedures for the new cycle, as discussed in the body of this Order.

5. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority and develop one or more tranches of conceptual local upgrades for each utility district and provide the estimated cost per megawatt and size of each conceptual

upgrade prior to the start of each Coordinated Grid Planning Process cycle, as discussed in the body of this Order.

6. Department of Public Service staff shall provide generation supply curve information on either a geographical or electrical basis that matches utility district mapping, in consultation with the New York State Energy Research and Development Authority, as discussed in the body of this Order.

7. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority and implement additional dispatchable emission-free resources options into the modeling, leverage the results of the recent technoeconomic assessment of various technologies, and consider other opportunities to examine resource adequacy and extreme weather sensitivities, in consultation with Department of Public Service staff, as discussed in the body of this Order.

8. Department of Public Service staff shall prepare conceptual bulk transmission costs for use in the capacity expansion model in Cycle 2, in consultation with the New York State Energy Research and Development Authority and New York Independent System Operator, Inc., as discussed in the body of this Order.

9. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority and incorporate production cost

modeling into Stage 1, following capacity expansion modeling, as discussed in the body of this Order.

10. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority, the New York Independent System Operator, Inc., and Department of Public Service staff to ensure an effective process and schedule alignment between the Coordinated Grid Planning Process and Order No. 1920 process, as discussed in the body of this Order.

11. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority and develop and present their methodology for nodal models prior to commencing each cycle, as discussed in the body of this Order.

12. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation shall consult with the Long Island Power Authority and phase the development of cost estimates, as discussed in the body of this Order.

13. In the Secretary's sole discretion, the deadlines set forth in this Order may be extended. Any request for an extension must be in writing, must include a justification for the extension, and must be filed at least three days prior to the affected deadline.

14. This proceeding is continued.

By the Commission,

(SIGNED)

MICHELLE L. PHILLIPS
Secretary

SUMMARY OF COMMENTSACE NY

ACE NY's comments include four primary recommendation subjects. First, ACE NY agrees with Staff's proposal from the Mid-Cycle Assessment that the CGPP process should be shortened to two years, arguing that three years is too long to meet New York State's timelines for renewables deployment and that two years better aligns with the NYISO's planning processes, thereby allowing for increased coordination of study.

Second, ACE NY proposes more explicit governance of the EPPAC. ACE NY also proposes process improvements, including the clarification and documentation of expectations for deliverables at each CGPP stage. ACE NY recommends touchpoints with EPPAC members at each stage of the CGPP to provide updates on progress and key milestones. ACE NY suggests additional time for scenario development in Stage 1 of the CGPP and that alternate DEFR options should be considered.

Third, ACE NY proposes several process improvements, technical improvements, and governance improvements. ACE NY suggests that Cycle 2 should include a scenario development guideline document as well as a technical conference on scenarios and future assumptions. The comments also include proposals for utilities to develop more granular estimates of incremental cost with a technical conference to include methodologies, assumptions, limitations, and a plan for regular updates. ACE NY also suggests a technical conference on DEFR technologies and their feasibility. ACE NY explains that conservative headroom estimates can lead to the inappropriate zonal shift of renewable generation and therefore suggests that additional headroom values should be provided to represent injection potential. ACE NY emphasizes that siting methodology

should be transparent, documented, and subject to detailed review by EPPAC members.

Fourth, ACE NY suggests that a NYPA "priority project" authority should be used to address high voltage and bulk solutions. ACE NY also recommends that the criteria to evaluate transmission solutions should be expanded beyond least cost solutions because they will not always result in the most efficient and cost-effective investment. Finally, ACE NY proposes that the utilities provide opportunities for out-of-cycle filings for the approval of upgrades if expedited transmissions proposals are deemed necessary to support integration with the CLCPA.

EarthJustice

EarthJustice emphasizes that it is critical to examine all possible transmission scenarios fully, including those that eliminate current location-based generation requirements. EarthJustice asserts that grid planning should focus on eliminating congestion across New York. EarthJustice also proposes that modeling scenarios which rely on the future conversion of existing peaker plants to burn hydrogen should not be included due to the injustices such a scenario would perpetuate. EarthJustice argues that hydrogen goes against the CGPP's mission to ensure compliance with the legal requirements of the Climate Act.

EDFR

EDFR recommends that in future cycles of the CGPP there should be more thorough documentation of EPPAC discussions and CGPP progress, including the drafting of meeting summaries, key decisions, action items, and open items. EDFR also suggests that detailed assumption files, results, and models should be made available to EPPAC members under the proper protections.

EDFR agrees with Staff's proposal from the Mid-Cycle Assessment that the CGPP process should be shortened to two years. EDFR also proposes to allow flexibility in the numbers of scenarios to be analyzed and to apply to wider cost estimate ranges in Stage 3. EDFR disagrees with Staff's recommendation to hire outside consultants to carry out CGPP capacity expansion modeling. EDFR advises that the NYISO should remain the entity of choice to conduct both capacity expansion and production cost modeling for the CGPP.

EDFR also calls for further scrutiny of the technical assumptions used in headroom estimates, the cost of incremental headroom, the siting of new generation, and the criteria for the development of transmission solutions. More specifically, EDFR proposes that the cost of incremental headroom be refined by both zone and order of magnitude.

IPPNY

In its comments, IPPNY proposes additional procedures related to administration of the EPPAC, including the establishment of a formal voting process. This voting process would include a short comment period before any vote, with comments and responses publicly posted in advance. A majority of EPPAC members would have to vote for an item to pass.

IPPNY agrees with Staff's proposal to shorten the CGPP cycle to two years to more effectively react to system changes. IPPNY believes that shortening the cycle would also increase alignment with the NYISO System and Resource Outlook. IPPNY disagrees with Staff's proposal to hire outside consultants to carry out CGPP capacity expansion modeling. IPPNY states that NYISO has the most up-to-date data and experience and suggests that an agreement between Staff and NYISO could rectify scheduling conflicts.

IPPNY also supports analysis on a variety of DEFERs and suggested an “all of the above” approach to defining what counts as zero emissions. Lastly, IPPNY encourages headroom analysis to remain transparent and open to feedback throughout the CGPP process as its incorrect calculation could lead to an undervaluation of existing clean resources.

Joint Utilities

The Joint Utilities urge the Commission not to shorten the duration of the CGPP cycle. To illustrate their point, the Joint Utilities offer potential options to revise the calendar and identify the likely consequences and tradeoffs, ultimately advising that it would be best to leave the cycle at its current length. Similarly, the Joint Utilities note that challenges in the current CGPP cycle are expected to materialize in the future. The Joint Utilities explain that the amount of time allotted for scenario development in Stage 1 of the first cycle of the CGPP was lacking and that reducing the time available for the discussions needed for scenario development would prevent the necessary and valuable exchange of ideas and information.

The Joint Utilities also indicate that Order 1920 is likely to result in changes to NYISO planning process and timelines. The Joint Utilities suggest that a CGPP timeline compression at this point in the process would impact the potential for alignment with 1920 to the point that the eventual coinciding of the two processes would become nearly impossible. Finally, the Joint Utilities discuss other policy matters raised in the Mid-Cycle Assessment, including support for a granular workplan in the next cycle of the CGPP, the earliest possible commencement for scenario development, and the development of a more precise approach to the development of cost estimation.

NEETNY

NEETNY's comments address four main issues. First, NEETNY proposes enhanced transparency and process improvements. NEETNY emphasizes that all models and data, including capacity expansion, production cost, and power flow models, should be available to interested stakeholders with appropriate protections. NEETNY suggests that future cycles of the CGPP should be more defined and structured, including increased documentation, detailed meeting summaries, and tracked action from EPPAC meetings. NEETNY recommends regular touchpoints with the EPPAC across all stages of the CGPP. NEETNY also proposes that EPPAC employ a voting system for decision making.

Second, NEETNY argues that greater clarity on bulk conceptual analysis is needed. NEETNY proposes that the capacity expansion model should be run with sensitivities that relax inter-zonal bulk transfer constraints for all Stage 1 Scenarios. NEETNY also advises that clear criteria to determine whether bulk solutions should be assessed. NEETNY suggests that work by Staff and NYSERDA to define how to study bulk conceptual solutions should begin before the analysis is underway.

Third, NEETNY asserts that the existing process does not adequately consider bulk transmission solutions, with analysis based on incorrect assumptions about existing capacity and the impact of local and bulk transmission facilities. NEETNY also views Stage 1 as too short to sufficiently discuss key technical assumptions with stakeholders. NEETNY suggests that future cycles include additional time. Additionally, NEETNY's comments include discussion of local transmission solutions, generator interconnection preferences, and perceived flaws in the current generation siting approach.

Fourth, NEETNY offers its support to streamline the CGPP cycle to two years and to integrate it with the NYISO

System Resource Outlook. To articulate these points, NEETNY comments specifically on several of the Joint Utilities' proposals to condense the CGPP timeline. NEETNY believes that flexibility should be maintained in the determination of how many scenarios will be studied beyond Stage 1, asserting that the number should not exceed three. NEETNY also argues that magnitude of the CGPP analysis should be reduced, limiting it to two periods. NEETNY proposes that a wider cost estimate range should be applied in CGPP Stage 3 and that the Commission consider reducing the duration of regulatory review from the one-year period put forth in the Initiating Order.

NYPA

NYPA's comments include two primary recommendations. First, NYPA suggests that the Utilities should employ production cost modeling in Stage 5 of the CGPP to allow the Commission to consider a more detailed analysis of grid operations and provide a detailed deliverability analysis that could quantify energy forecasts by generation resource and consider transmission constraint impacts. NYPA emphasizes that a production cost model would ensure consistent evaluation of bulk and local transmission investments.

Second, NYPA proposes improvements to EPPAC engagement in future cycles of the CGPP. NYPA suggests sharing materials three days in advance, setting a clear agenda before each meeting, identifying key issues, and establishing a formal voting process. NYPA also recommends that if potential bulk solutions are assessed in the CGPP, then additional touch points should be established for EPPAC members to provide input.

WATT Coalition

WATT's comments focus on the Advanced Technologies Working Group (ATWG) and its efforts to deploy Grid Enhancing Technologies (GETs) on the New York State Grid. WATT emphasizes

the importance of the ATWG's input into the CGPP as a tool for ensuring that utilities fully leverage GETS to benefit ratepayers and adopt cost-effective investment plans. WATT suggests improving the ATWG process to increase stakeholder engagement, explaining that refinement of ATWG's work will support New York's transmission planning. WATT proposes that the ATWG have a more transparent research process, increase engagement with technology vendors, and facilitate broader stakeholder engagement, including with EPPAC. WATT also recommends that reports shared by the ATWG for the CGPP should be made public and that its members with technical transmission expertise should be included in the EPPAC.