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Via Electronic Delivery

October 7, 2024

Hon. Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: 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.

**COMMENTS OF INDEPENDENT
POWER PRODUCERS OF NEW YORK, INC.**

The Coordinated Grid Planning Process (“CGPP”) requires utilities and the Public Service Commission (“Commission”) to develop new planning processes focused on identifying the distribution, local transmission, and bulk electric system upgrades that will be needed to meet the State’s climate targets. To accomplish this, the Commission and Joint Utilities are charged with completing six defined stages, with feedback from the Energy Policy Planning Advisory Council (“EPPAC”). These stages are highlighted in the mid-cycle assessment of their progress.¹ IPPNY² has participated as a member of the EPPAC through our representative Dr. Radha

¹ 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 Approving a Coordinated Grid Planning Process (Aug. 17, 2023) (“Order”).

² IPPNY is a trade association representing companies involved in the competitive power supply industry in New York State and in the development of electric generating facilities, the generation, sale, and marketing of electric power, and the development of natural gas and energy storage facilities. IPPNY Member companies produce most of New York’s electricity, utilizing hydro, nuclear, wind, natural gas, solar, energy storage, biomass, oil, and waste-to-energy.

Soorya of Invenergy. IPPNY supplies limited comments regarding the June 3 filing by Joint Utilities,³ recommending a shortening of the process, and the July 15 filing of the mid-cycle assessment.⁴

IPPNY appreciates the effort that has been undertaken thus far by the EPPAC in guiding the process; however, significant revisions must be made for the process to be more effective. The mid-cycle assessment does not mention the development of formal rules for the EPPAC, the lack of which currently leads to disarray whereby all stakeholder views are not thoroughly heard and addressed. There is also no process in place for the public filing of comments on proposed decisions, nor a set comment period. Further, there is a lack of a transparent voting process in place for EPPAC, with a vote only being taken if it is unanimous without any record keeping. These procedural shortcomings fail to account for the views of entities like IPPNY and ACE-NY, representing 90 member companies accounting for 80% of New York electric generation and New York's renewable generator industry at large, respectively. IPPNY, therefore, recommends a short (1 week) comment period before any vote of the EPPAC, with the comments (and responses) publicly posted, before a roll call vote where a majority of EPPAC members must vote yes for the item to pass.

IPPNY agrees with the recommendations to shorten the process to two years. As the system changes rapidly to achieve the 2040 Climate Leadership and Community Protection Act ("CLCPA") mandates, these CGPP and EPPAC processes must be able to react. This two-year timeline also aligns with the New York Independent System Operator, Inc's ("NYISO") System

³ Case 20-E-0197, *supra*, JU - CGPP Calendar Compression Filing (June 3, 2024).

⁴ Case 20-E-0197, *supra*, CGPP Mid-Cycle Assessment (July 15, 2024).

and Resource Outlook,⁵ the modeling for which was coincident with the EPPAC's requested modeling.

In the mid-cycle assessment, thought is given on whether to solicit outside consultants to model the analysis required by the CGPP rather than working solely with the NYISO.⁶ IPPNY encourages the EPPAC to continue working in conjunction with the NYISO, rather than hiring outside consultants. The CGPP's work gains a statewide perspective when performed in concert with the NYISO's planning studies, such as the System and Resource Outlook, and when these entities work together. Further, it is beneficial to have the NYISO, which has the most up-to-date data and hands-on experience, offer its perspectives on possible modeling. The onus put on the NYISO and conflict in scheduling timelines should be rectified through agreements such as the Requested Economic Planning Study agreement.

Lastly, IPPNY concurs with the analysis of a variety of Dispatchable Emissions Free Resource options, as they are set to make up a significant portion (20-40 GW) of the grid by 2040.⁷ As IPPNY has guided the Commission, in the separate process under the Clean Energy Standard ("CES") proceeding on defining what qualifies as zero emissions sources under the CLCPA, an all-of-the-above approach must be taken.⁸ The outcome of that CES proceeding on what qualifies as zero emissions sources will have significant impacts on what transmission is needed. IPPNY also requests that the headroom analysis, one of the key functions of the CGPP,

⁵ See 2023-2042 System & Resource Outlook (The Outlook), NYISO (July 23, 2024), ("2024 Outlook"), <https://www.nyiso.com/documents/20142/46037414/2023-2042-System-Resource-Outlook.pdf/8fb9d37a-dfac-a1a8-8b3f-63fbf4ef6167>.

⁶ *Id.* at 9.

⁷ 2024 Outlook at 48.

⁸ See Case 15-E-0302, *Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard*, Petition of Independent Power Producers of New York, Inc., New York State Building & Construction Trades Council and New York State AFL-CIO for the Establishment of a Zero Emissions Energy Systems Program Under the Clean Energy Standard (Aug. 18, 2021).

continue to be transparent and open to feedback. Headroom, if calculated incorrectly, can lead to an undervaluation of existing clean resources, which need to stay on the system to meet the CLCPA mandates.

IPPNY appreciates the opportunity to participate in the CGPP and provide comments. The procedures for the CGPP and EPPAC must be laid out in greater clarity and detail, so that the important results coming from the process have merit.