

Case 19-T-0684

Application of New York Transco LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII of the New York Public Service Law to Construct, Operate, and Maintain a New, Double-Circuit 54.5-Mile 345/115 Kilovolt Electric Transmission Line and Related Facilities Located in the Town of Schodack, Rensselaer County; the Towns of Stuyvesant, Stockport, Ghent, Claverack, Livingston, Gallatin, and Clermont in Columbia County; and the Towns of Milan, Clinton, and Pleasant Valley in Dutchess County

**NEW YORK TRANSCO LLC OBJECTIONS & RESPONSES TO
INTERROGATORY/DOCUMENT REQUEST**

Request No.:	Jl-11
Requested By:	Joint Intervenors
Directed To:	New York Transco LLC
Date of Request:	October 8, 2020
Date of Response:	October 19, 2020
Subject:	Dr. Samuel A. Newell – Rebuttal Testimony

TRANSCO GENERAL DEFINITIONS

1. “CEII” shall mean “critical infrastructure” and “critical energy infrastructure” information as defined in Public Officers Law § 86 (5) and 18 CFR § 388.133 (c) (2), respectively.
2. “DPS” shall mean the New York State Department of Public Service.
3. “Joint Intervenors” shall mean the Towns of Livingston, Milan, and Pleasant Valley, together with Farmers and Families for Livingston, Farmers and Families for Claverack, and Walnut Grove Farm.
4. “Transco” shall mean New York Transco LLC.
5. “Protective Order” shall mean Administrative Law Judge Anthony Belsito’s Ruling Adopting Protective Order issued February 13, 2020 and the Ruling Adopting Amended Protective Order issued May 7, 2020.
6. “PSC” shall mean the New York Public Service Commission.
7. “PSL” shall mean New York State Public Service Law.
8. “Staff” shall mean DPS Staff.

TRANSCO GENERAL OBJECTIONS

Transco makes the following general objections (collectively, “General Objections”), which shall be incorporated by reference into the below specific responses, as if expressly restated therein, without limiting or waiving any other objections to the instant information requests (individually, the “Request” and collectively, the “Requests”) proffered by the Joint Intervenor:

1. Transco objects to the Requests to the extent they seek information or production of documents that is or are subject to the attorney-client privilege, constitute attorney work product, are protected under state or federal law or are proprietary or confidential, or constitute draft and/or non-final documents and/or communications containing or concerning same. The inadvertent disclosure of any information or production of any document that is confidential, privileged, was prepared in anticipation of litigation, or is otherwise irrelevant and/or immune from discovery, shall not constitute a waiver of any such privilege or of any ground for objection with respect to such information or document, the subject matter of the information or document, or of Transco’s rights to the use of any such information or document in any regulatory proceeding or lawsuit. Transco reserves its right to request the return of any such documents or information in the event of any inadvertent disclosure.
2. Transco objects to the Requests to the extent they are not tailored to this particular proceeding, are not commensurate with the importance of the issues to which each Request relates, and/or seek information or documents that is or are not relevant to any matter within the PSC’s jurisdiction.
3. Transco objects to the Requests to the extent they seek documents or information regarding matters, or from entities, over which the PSC (including Staff) has no authority or jurisdiction under the PSL.
4. Transco objects to the Requests to the extent they seek information concerning matters that, due to federal preemption or preclusion, are not subject to regulation by the State of New York.
5. Transco objects to Requests that are overbroad or unduly burdensome to the extent that they (a) are cumulative; (b) call for the production of documents not in Transco’s possession, custody, or control; (c) call for the review, compilation or production of publicly-available documents that could be obtained by the requesting party in a less-burdensome manner, including on a public website; (d) call for the review, compilation, and/or production of a voluminous number of documents at great expense to Transco; or (e) are duplicative of discovery requests already issued in this proceeding and responded to by Transco.
6. Transco objects to the Requests to the extent they seek documents and information already known to or possessed by the requesting party or which are available to those entities from documents in their own files or from public sources including, but not limited to, the DPS website or other online sources.

7. Transco objects to the Requests to the extent they seek sensitive, proprietary and/or competitive information, trade secret information, confidential commercial information, work product, and/or material that is the subject of confidentiality agreements with third parties. To the extent Transco has elected to produce any confidential commercial information and/or trade secret information, such information is being produced solely for use in the above-captioned proceeding pursuant to the Protective Order.
8. Transco objects to the Requests to the extent they seek information and documents that are not known or reasonably available to Transco. Transco further objects to all Requests to the extent they seek to compel Transco to generate or to create information and/or documents that do not already exist.
9. Transco objects to the Requests to the extent they seek CEII.
10. Transco's agreement to provide information or documents in response to the Requests is not:
(a) an acceptance of, or agreement with, any of the characterizations or purported descriptions of the transactions or events contained in these Requests; (b) a concession or admission that the requested material is relevant to any matter within the jurisdiction of the State of New York or any of its agencies; (c) a waiver of the objections herein; (d) an admission that any such information or documents exist; or (e) an agreement to provide information or documents pursuant to any other Request.
11. Each response reflects the information or documents located by Transco given the scope and nature of the Request at issue and as evidenced by the sponsor(s) of such response, after a reasonable, diligent search in the response period in which the Joint Intervenors have requested a response to be provided, particularly in light of the scope and breadth of the Requests. Transco reserves its right to amend or supplement the responses, including the assertion of additional objections, and any production of information and documents as additional discovery and investigations continue, in the event that additional information is identified, or in the event of error, inadvertent mistake, or omission.

JI-11.1

Dr. Newell, on page 8 of his rebuttal testimony, states that “... the projects enable greater reliance on relatively low cost and plentiful upstate resources to serve downstate loads.” Referring to the NYISO 2020 Gold Book and the latest NYISO Queue, please identify specifically what existing or proposed renewable Upstate generating projects or resources will serve downstate loads by Segment B?

Transco’s Response to JI-11.1. Transco hereby incorporates the General Objections set forth above and further objects to this request because it mischaracterizes Dr. Newell’s testimony and the import of the NYISO 2020 Gold Book as well as the NYISO Queue. Furthermore, Transco objects to the extent this request asks Transco to undertake a study of specific existing or proposed projects or resources that is otherwise not required. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

Dr. Newell’s statement that the “Projects enable an increase in relatively low cost and plentiful resources upstate resources to serve Downstate loads” is based on the type, location, and scale of resources identified in the several long-term analysis summarized in Section III.C of Exhibit ____ (SN-2) that will be necessary to meet future loads, and does not refer to any specific existing or proposed renewable Upstate generating projects or resources listed in either the NYISO 2020 Gold Book or the NYISO Queue.

In general, no individual renewable Upstate generating projects or resources can be identified as specifically serving Downstate loads. Instead, all resources help serve all loads, and Upstate generation helps meet Downstate loads whenever low-cost generation is more plentiful Upstate than Downstate.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.2

Does Dr. Newell agree with the NYISO MMU Evaluation of the Proposed AC Public Policy Transmission Projects, Potomac Economics (February 20L9) (“MMU Evaluation”), Exhibit 2 to Dr. Paynter’s Rebuttal Testimony, at page vi, that “Hence, the recent shift in the planned placement of renewable generation (from upstream to downstream of the projects) would make the recommended projects less beneficial.” If Dr. Newell does not agree, please present the basis for the disagreement.

Transco’s Response to JI-11.2. Transco hereby incorporates the General Objections set forth above and further objects to the extent the question is vague as to the context. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

Yes, Dr. Newell agrees that *with all else being equal* shifts in renewable generation from upstream to downstream of the Projects would make the Projects less beneficial. However, not all else is equal. The CLCPA mandate to add 9 GW of offshore wind resources is part of a package of policies that will tend to increase the value of the Projects. As Dr. Newell explains on pages 12 to 13 of Exhibit ____ (SN-2):

“These mandated and specified resources will provide only a portion of the clean energy that will be required to meet the goals of 70% renewable electricity by 2030 and 100% carbon-free electricity by 2040, however. The CLCPA requires all demand to eventually be met by non-emitting resources, and future demand will be substantially higher than it is today because economy-wide decarbonization will involve electrifying transportation and heating sectors. For example, NYISO’s ‘CLCPA’ load forecast that includes electrification indicates 130 TWh of annual load Downstate by 2040, compared to only about 33 TWh of supply from 9 GW of Downstate-specific mandated resources. The rest will have to be met by additional offshore and onshore renewable resources that can be developed cost-effectively Downstate, plus many resources from Upstate. Importantly, by expanding the transfer capability between the Upstate and Downstate portions of the State’s grid, the Projects will expand options for meeting Downstate clean energy needs from Upstate resources if Downstate resources are limited or cost more to develop.

In addition, even for a given set of resources, the Projects will allow for capturing resource diversity across the State, enabling energy from Upstate solar, wind, nuclear, and hydroelectric resources to meet Downstate needs when offshore wind generation intermittently decreases and vice versa. For example, offshore wind can fall to near-zero for hours or days, and its monthly average varies by season; Upstate wind and solar are also intermittent, but they complement offshore wind because their output does not follow the same patterns as offshore wind. In this context, expanding transmission between Upstate and Downstate benefits the system and represents an economic and reliability need. Expanded transmission also provides benefits by enabling lower-cost ways to meet the CLCPA emission reduction requirements, particularly when recognizing the value of avoiding emissions from fossil generation Downstate. The CLCPA requirement to eliminate all emissions—even from the most extended periods of low output from intermittent

resources—implies a very high value of avoiding emissions, likely well beyond the carbon charges and social cost of carbon that have been discussed in the New York market.”

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.3

Has Dr. Newell quantified how much less beneficial the projects are given the current NYISO Queue that projects over 20,000 MWs to be sited in Downstate, i.e., downstream of the projects?

Transco's Response to JI-11.3. Transco hereby incorporates the General Objections set forth above and further objects to this question because it mischaracterizes the contents and the import of the NYISO Queue, which does not, in fact, project over 20,000 MWs to be sited in Downstate. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

No. The suggested analysis would misrepresent the new resources that will be sited Downstate. The capacity in the NYISO Queue is not a projection of the types or amounts of future capacity to be built in the NYISO market. It merely reflects the potential projects that are currently being studied for interconnection feasibility and cost, whether or not such projects will even be developed. Furthermore, the queue may include multiple entries for the same projects that are being studied at more than one interconnection point.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.4

Has Dr. Newell assessed the impact of the pandemic on downstate short and long-term demand and hence, the need for Segment B? If so, please provide a copy of that assessment. If not, why not?

Transco's Response to JI-11.4. Transco hereby incorporates the General Objections set forth above. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

No, the future short-term and long-term demand impacts of the pandemic are currently unknown.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.5

Please provide a copy of or link to “...the recent Brattle NYISO Grid Evolution study” cited on page 11, lines 15-16 of Dr. Newell’s Rebuttal Testimony.

Transco’s Response to JI-11.5. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

A link to the Brattle NYISO Grid Evolution study is included in footnote 4 of Dr. Newell’s Rebuttal Testimony. We provide a copy of the citation here:

Lueken, Newell, *et al.*, *New York’s Evolution to a Zero Emission Power System* (Dated June 22, 2020). (“Brattle NYISO Grid Evolution study”) Available at <https://www.nyiso.com/documents/20142/13245925/Brattle%20New%20York%20Electric%20Grid%20Evolution%20Study%20-%20June%202020.pdf/69397029-ffed-6fa9-cff8-c49240eb6f9d> (last accessed Sep. 29, 2020).

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.6

Please explain in detail the statement on page 13, lines 17 to 20, that “[p]ostponing the approval process would delay the realization of the projects benefits will also delay implementation of other portions of the CLCPA plan that may depend on the infrastructure provided by the projects.” Specifically, what are the “... other portions of the CLCPA that may depend on the infrastructure provided by the projects”?

Transco’s Response to JI-11.6. Transco hereby incorporates the General Objections set forth above and further objects to this question to the extent it asks for an explanation previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

The portion of the CLCPA that is most likely to depend on the Projects is the requirement that 70% of Statewide electricity generation come from renewable energy sources by 2030 and 100% by 2040. As stated in Exhibit ____ (SN-2), the Projects are included in NYISO’s authoritative 2020 RNA study, which is presumably being used as the basis for the several studies underway to evaluate the system needs to achieve the CLCPA requirements.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and
Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.7

Please provide a copy of or link to “NYISO’s 2019 *Grid in Transition* whitepaper” cited on page 4, of Dr. Newell’s Rebuttal Testimony, Exhibit ____ (SN-1).

Transco’s Response to JI-11.7. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

You can find NYISO’s 2019 *Grid in Transition* whitepaper at the following link:
<https://www.nyiso.com/documents/20142/2224547/Reliability-and-Market-Considerations-for-a-Grid-in-Transition-20191220%20Final.pdf/61a69b2e-0ca3-f18c-cc39-88a793469d50>

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.8

Please provide a copy of or link to NYISO's *Carbon Pricing* whitepaper as cited on page 5, of Dr. Newell's Rebuttal Testimony, Exhibit ____ (SN-1).

Transco's Response to JI-11.8. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

You can find NYISO's *Carbon Pricing* whitepaper at the following link:
<https://www.nyiso.com/documents/20142/2244202/IPPTF-Carbon-Pricing-Proposal.pdf/60889852-2eaf-6157-796f-0b73333847e8?t=1547044924178>

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.9

Please provide a copy of or link to the “...benefit-cost analysis of replacing its prompt capacity market with a 4-year forward capacity market” as cited on page 8, of Dr. Newell’s Rebuttal Testimony, Exhibit ____ (SN-1).

Transco’s Response to JI-11.9. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

You can find the June 2009 report *Cost-Benefit Analysis of Replacing the NYISO’s Existing ICAP Market with a Forward Capacity Market* at the following link:

http://files.brattle.com/files/6339_cost-benefit_analysis_for_nyiso_newell_et_al_jun_15_2009.pdf

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.10

Please provide a copy of or link to “*Wholesale Market Impacts of Price-Responsive Demand (PRD)*” for the NYISO as cited on page 13, of Dr. Newell’s Rebuttal Testimony, Exhibit ____ (SN-1).

Transco’s Response to JI-11.10. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

You can find the October 2009 report *Dynamic Pricing: Potential Wholesale Market Benefits in New York State* at the following link:

https://www.nyiso.com/documents/20142/3071469/Dynamic_Pricing_NYISO_White_Paper_102709.pdf/6cc8301e-9465-c763-a318-90380d713b02

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.11

Please provide a copy of or link to *Offshore Wind Transmission: An Analysis of Options for New York*, as cited on page 23, of Dr. Newell's Rebuttal Testimony, Exhibit ____ (SN-1).

Transco's Response to JI-11.11. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

You can find the October 2009 report *Offshore Wind Transmission: An Analysis of Options for New York* at the following link:
[https://brattlefiles.blob.core.windows.net/files/19744_offshore_wind_transmission -
_an_analysis_of_options_for_new_york.pdf](https://brattlefiles.blob.core.windows.net/files/19744_offshore_wind_transmission_-_an_analysis_of_options_for_new_york.pdf)

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and
Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.12

Please provide a copy of or link to *Quantitative Analysis of Resource Adequacy Structures* as cited on page 23, of Dr. Newell's Rebuttal Testimony, Exhibit ____ (SN-1).

Transco's Response to JI-11.12. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

You can find the May 2020 report *Quantitative Analysis of Resource Adequacy Structures* at the following link:

https://brattlefiles.blob.core.windows.net/files/18985_quantitative_analysis_of_resource_adequacy_structures.pdf

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.13

Please provide a copy of or link *New York's Evolution to a Zero Emission Power System: Modeling Operations and Investment Through 2040 Including Alternative Scenarios* as cited on page 23, of Dr. Newell's Rebuttal Testimony, Exhibit ____ (SN-1).

Transco's Response to JI-11.13. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

Please refer to the response to JI-11.5.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and
Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.14

Please provide a copy of or link to *New York ISO Climate Change Impact Study, Phase I: Long-Term Load Impact* cited on page 6, of Dr. Newell's Rebuttal Testimony, Exhibit ____ (SN-2).

Transco's Response to JI-11.14. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

A link to *New York ISO Climate Change Impact Study, Phase I: Long-Term Load Impact* was provided in footnote 40 of Dr. Newell's Rebuttal Testimony. We provide a copy of the citation here:

Itron, New York ISO Climate Change Impact Study, Phase I: Long-Term Load Impact, submitted to NYISO (Dated Dec. 2019), Tables A-141 through A-153, corresponding to zones G, H, I, J, and K. Available at <https://www.nyiso.com/documents/20142/10773574/NYISO-Climate-Impact-Study-Phase1-Report.pdf> (last accessed Sep. 29, 2020).

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.15

On page 6, of Dr. Newell's Rebuttal Testimony, Exhibit ____ (SN-2), he states that "Indeed, the Brattle NYISO Grid Evolution study demonstrates that power flows on the transmission system between Upstate and Downstate increase markedly after 2033." In what direction are the flows increase, i.e., from Upstate to Downstate or vice versa?

Transco's Response to JI-11.15. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent the information is in the cited study. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

The flows increase from Upstate to Downstate.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and
Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.16

Please provide a copy of or link to the *Brattle NYISO Grid Evolution* study, if different than the *New York's Evolution to a Zero Emission Power System: Modeling Operations and Investment Through 2040 Including Alternative Scenarios* as cited on page 23, of Dr. Newell's Rebuttal Testimony, Exhibit ____ (SN-1).

Transco's Response to JI-11.16. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

The *Brattle NYISO Grid Evolution* study refers to the study titled *New York's Evolution to a Zero Emission Power System: Modeling Operations and Investment Through 2040 Including Alternative Scenarios*. Please refer to the response to JI-11.5 for a link to the study.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.17

Please provide a copy of or link to the *Analysis Group, NYISO (sic) Climate Phase II Study* (Date April 2, 2020) as cited in footnote 56 on page 18 of Dr. Newell's Rebuttal Testimony, Exhibit ____ (SN-2).

Transco's Response to JI-11.17. Transco hereby incorporates the General Objections set forth above and further objects to this request to the extent it seeks information previously provided. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

You can find the April 2020 report *NYISO Climate Change Phase II Study* at the following link:

<https://www.nyiso.com/documents/20142/12126107/05%20Climate%20Change%20Phase%20II.pdf/3b069a2a-9d32-6e5e-30ae-eb5703a8d64b>

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.18

Has Dr. Newell estimated the increase in retail electric rates as a result of the construction and operation of the Segment A and Segment B transmission projects? If so, what are the average increases to the Downstate and Upstate Zones?

Transco's Response to JI-11.18. Transco hereby incorporates the General Objections set forth above and further objects to this request because it seeks information not relevant to this proceeding. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

No.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and
Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco

JI-11.19

Has Dr. Newell estimated the increase in wholesale electric rates as a result of the construction and operation of the Segment A and Segment B transmission projects? If so, what are the average increases to the Downstate and Upstate Zones?

Transco's Response to JI-11.19. Transco hereby incorporates the General Objections set forth above and further objects to this request because it seeks information not relevant to this proceeding. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

No.

Name and Title of Person(s) Responsible for Response: Dr. Samuel A. Newell, Principal and
Leader of Electricity Practice at The Brattle Group

Date: October 19, 2020

Entity on Behalf of Which the Response is Provided: Transco