

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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

**JOINT UTILITIES' PETITION CONCERNING TIMING FOR ANNUAL HEADROOM
CALCULATION UPDATES**

On September 9, 2021, the Commission issued its *Order on Local Transmission and Distribution Planning Process and Phase 2 Project Proposals* (Phase 2 Order)¹ in this proceeding. The Phase 2 Order addressed a number of matters concerning local transmission and distribution (LT&D) investments and adopted Department of Public Service (DPS) Staff recommendations concerning the calculation of headroom data.² It also directed the Joint Utilities³ to file updated headroom calculations every six months to help DPS Staff, the New York State Energy Research and Development Authority (NYSERDA), and generation developers understand existing system limitations that can be identified using the methods proposed by DPS Staff⁴ and confirmed by the Commission. The Joint Utilities have filed four biannual headroom estimate updates under the Phase 2 Order's direction.

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* (LT&D Planning Proceeding), Order on Local Transmission and Distribution Planning Process and Phase 2 Project Proposals (September 9, 2021).

² Phase 2 Order, pp. 3, 50.

³ The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Long Island Power Authority, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

⁴ LT&D Planning Proceeding, Staff Straw Proposal for Conducting Headroom Assessments (March 16, 2021).

On August 17, 2023, the Commission issued the *Order Approving a Coordinated Grid Planning Process*⁵ (CGPP), which directed the Joint Utilities to consult with DPS Staff and NYSERDA about the timing of headroom calculation updates and to propose “an annual headroom reporting date that, once accepted by the Commission, will replace the semi-annual headroom reporting requirement.”⁶

The Joint Utilities met with DPS Staff and NYSERDA in October 2023 to review the headroom calculation methodology and to discuss the various regulatory and planning processes the revised headroom calculations should inform. The Joint Utilities hereby respectfully propose to retain the current statewide methodology for calculating headroom, and to establish an annual headroom update filing date of October 1 of each year beginning in 2024.

An October 1 filing date will allow new headroom figures to inform future CGPP cycles.⁷ In particular, this filing date would align with and inform CGPP Stage 1 (Capacity Expansion Analysis), CGPP Stage 3 (Local Assessment), and CGPP Stage 5 (Least-Cost Planning Assessment). An October 1 filing date will also be well positioned to support generation developers in their preparations for participation in NYSERDA solicitations as well as inform the work performed by the New York Independent System Operator (NYISO) as part of the NYISO’s System and Resource Outlook.

The Joint Utilities remain committed to supporting the State’s leadership on environmental and climate matters, and to meeting the purposes identified in the Phase 2 Order. An annual headroom update cadence with an October 1 filing date will facilitate achievement of the State’s clean energy objectives.

⁵ LT&D Planning Proceeding, Order Approving a Coordinated Grid Planning Process (August 17, 2023) (CGPP Order).

⁶ LT&D Planning Proceeding, CGPP Order, p. 40.

⁷ The first CGPP cycle will begin with capacity expansion models that will build on headroom conditions in January 2024, per the Commission’s direction in the CGPP Order. Future cycles are expected to begin in January as well.

Dated: December 12, 2023

Respectfully submitted,

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