

NYT RESPONSE TO CVEC/NYT 2
(SYNCHRONOUS RESONANCE)

CASE 19-T-0684
APPLICATION OF NEW YORK TRANSCO LLC
FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY
AND PUBLIC NEED

NEW YORK TRANSCO LLC OBJECTIONS & RESPONSES TO
CRICKET VALLEY ENERGY CENTER, LLC
INTERROGATORY/DOCUMENT REQUEST
ADDRESSED TO
NEW YORK TRANSCO LLC

Request No.: CVEC/NYT-2
Information Requested of: New York Transco LLC
Date of Request: February 4, 2020
Date of Request: February 4, 2020
DATE OF PARTY STATUS: April 17, 2020
DATE OF RESPONSE: April 27, 2020
Subject: Synchronous Resonance

TRANSCO GENERAL DEFINITIONS

1. “CEII” shall mean critical electric infrastructure information as defined in Section 86 (5) of the Public Officers Law and 18 CFR 388.133 (c) (2)
2. “DPS” shall mean the New York State Department of Public Service
3. “NYISO” shall mean the New York State Independent System Operator, Inc.
4. “OATT” shall mean the NYISO’s Open Access Transmission Tariff
5. “Protective Order” shall mean Administrative Law Judge Anthony Belsito’s Ruling Adopting Protective Order issued February 13, 2020
6. “PPTPP” shall mean the NYISO’s Public Policy Transmission Planning Process
7. “Project” shall mean the New York Energy Solution Project, which is currently being evaluated by the NYISO under Q543
8. “PSC” shall mean the New York Public Service Commission
9. “PSL” shall mean New York State Public Service Law
10. “Staff” shall mean DPS Staff
11. “Transco” shall mean New York Transco LLC, a New York limited liability company

12. “Cricket Valley” shall mean Cricket Valley Energy Center, LLC

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 Cricket Valley:

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 by Cricket Valley 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 from documents in their

own files, files they have access, or from public sources including, but not limited to, the DPS website, the NYISO website or at the committee meeting level, 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 to Cricket Valley and 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 Cricket Valley has 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.

CVEC/NYT-2

Please describe the scope of work that has been or will be undertaken to prevent synchronous resonance risks to generators on the New York Independent System Operator grid that could be caused by the series compensation features of the proposed project.

Transco's Response to CVEC/NYT-2. Transco hereby incorporates the General Objections set forth above and further objects to this Request as overbroad and seeking information not relevant to any matter within the PSC's jurisdiction in this PSL Article VII proceeding. More specifically, the topic of subsynchronous resonance ("SSR") will be fully vetted and reviewed during the NYISO's interconnection process pursuant to Attachment P of the OATT, not the PSC in this PSL Article VII proceeding. Transco expects that Cricket Valley is participating or will participate as a stakeholder in the NYISO's ongoing evaluation of the Project as described below to the extent it is further interested in the Project's interconnection review. Subject to and without waiving any of the General Objections and/or the specific objections set forth herein, Transco provides the following response:

During the NYISO's Public Policy Transmission Planning Process ("PPTPP") that resulted in the the Project's selection as the more cost-effective or efficient solution to satisfy the declared Public Policy Transmission Need for the UPNY/SENY transmission corridor (*see* Exhibit 3 to Transco's Article VII Application), and through its stakeholder process, the NYISO fully vetted the Project. The vetting process included a technical evaluation and consideration of any potential SSR impacts that the Project could have as a result of the Project's use of series compensation. At the NYISO committee level, there was robust discussion of the Project's System Impact Study, including SSR. Cricket Valley can readily review all of these stakeholder materials and other publicly-available NYISO records related to this subject. In addition, the NYISO has informed interested stakeholders that the potential for SSR impacts will be addressed in the NYISO's interconnection process, which is ongoing.

Name and Title of Person(s) Responsible for Response: John Beck, Senior Consultant, EN Energy Engineering

Date: April 27, 2020

Entity on Behalf of Which the Response is Provided: Transco