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November 10, 2026

Hon. Michelle L. Phillips
Secretary to the Commission
NYS Public Service Commission
3 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.

CASE 24-E-0645 - Petition of New York Independent System Operator, Inc. Regarding Public Policy Transmission Needs for Consideration for 2024.

COMMENTS OF THE NEW YORK ENERGY CONSUMERS COUNCIL, INC.

Dear Secretary Phillips:

The New York Energy Consumers Council ("NYECC") respectfully requests permission to file this letter as supplemental comments to comments filed by NYECC on September 10, 2026 in the above-referenced proceedings.

The NYECC and its predecessor organizations[1] have represented the energy interests of commercial property owners and managers in New York City before State agencies for more than 70 years. NYECC also continues to represent institutions such as colleges, hospitals, financial institutions, real estate organizations, and other energy consumers throughout New York City. Collectively, NYECC's membership is responsible for approximately 260 million square feet of office space and approximately 105,000 housing units in New York City and Westchester County. NYECC's membership includes landmark member properties such as One World Trade Center, 7 World Trade Center, One Bryant Park and Rockefeller Center. Consistent with its mission, NYECC advocates for the safe,

[1] The Owners Committee on Electric Rates (OCER) and the New York Energy Buyers Forum (NYEBF).

reliable, and affordable generation, transmission, and delivery of energy while supporting an environmentally responsible and sustainable energy future.

NYECC appreciates the opportunity to provide supplemental comments in the above referenced proceedings.

NYECC continues to approach transmission planning from the perspective of energy consumers who ultimately bear the costs and receive the benefits of infrastructure investments. As such, NYECC generally continues to support infrastructure development that improves reliability, enhances system resilience, supports economic growth, and advances New York's environmental objectives when those benefits can be achieved in a cost-effective manner.

NYECC continues to recognize the importance of coordinated, long-term planning as New York responds to increasing electric demand, growing electrification, evolving reliability needs, and uncertainty regarding the timing and composition of future resource development. The Coordinated Grid Planning Process's ("CGPP") use of scenario-based planning, engineering analyses, and least-cost assessment continues to represent an important effort to address those challenges and identify investments that may provide value under a range of plausible futures.

Accordingly, NYECC offers the following supplemental comments on the CGPP Cycle 1 Report and its findings, as well as a potential Public Policy Transmission Need ("PPTN"):

Since submitting its initial comments, NYECC has continued its due diligence regarding the proposed local transmission projects, including discussions with several utilities regarding project need, anticipated benefits, and broader system implications. This additional review has reinforced NYECC's support for the proposed portfolio and provided greater insight into the benefits of individual projects.

In summary, NYECC's additional due diligence has reinforced its support for the CGPP framework and the proposed portfolio of local transmission investments. In particular, the Ridge Hill project appears to provide a compelling combination of reliability, electrification, clean-energy, transmission, and statewide system benefits. NYECC supports favorable consideration of the Ridge Hill project and believes that both its benefits and its costs should be evaluated from a statewide perspective.

1. NYECC continues to support the CGPP framework and the planning process that produced the proposed portfolio.

As described in its previously filed comments, NYECC supports coordinated, long-term transmission planning that considers a range of potential system conditions and identifies investments capable of providing value across multiple future scenarios. NYECC believes transmission investment will be necessary to maintain reliability while supporting electrification, decarbonization, and economic growth across the State. NYECC therefore continues to support the CGPP framework and favorable consideration of the proposed local transmission portfolio.

Consistent with its prior comments, NYECC also believes that substantial transmission investments must be accompanied by transparency, cost discipline, and accountability as projects advance. Continued assessment of project need, scope, cost, and customer benefits will be essential to ensuring that approved investments remain prudent as underlying system conditions evolve.

2. NYECC's additional due diligence reinforces its support for the proposed portfolio.

Since submitting its initial comments, NYECC has engaged directly with utilities and other stakeholders to better understand individual projects, the system needs they are intended to address, and the benefits they are expected to provide. Those discussions have generally reinforced NYECC's view that the proposed portfolio represents infrastructure investments worthy of serious consideration by the Commission.

NYECC continues to view the proposed projects as largely "no-regrets" investments that can provide value under multiple potential futures, including through improved reliability, accommodation of future load growth and electrification, and increased flexibility as New York's generation mix changes. This conclusion does not diminish the importance of continued bulk transmission planning. NYECC continues to support evaluation of potential bulk transmission needs through the PPTN process and believes local and bulk transmission investments should be viewed as complementary components of New York's long-term transmission strategy.

3. The Ridge Hill project's broad benefits warrant favorable consideration within the proposed portfolio.

While NYECC supports the proposed portfolio as a whole, its additional due diligence has highlighted Ridge Hill as a project whose broad combination of potential benefits warrants favorable consideration. Our understanding is that the project can improve reliability and operational flexibility in New York City, support continued electrification and future load growth, increase access to cleaner generation resources, and provide infrastructure capable of supporting future transmission expansion. In that respect, the Ridge Hill project appears to function as both a local reliability project and a strategic transmission-enablement investment with broader system value.

4. The Ridge Hill project's statewide benefits provide further grounds for favorable consideration.

Our understanding is that the Ridge Hill project would improve reliability, operational flexibility, and transfer capability into New York City, benefiting downstate customers and helping to accommodate future electrification and load growth. Increased transfer capability would also provide generation resources elsewhere in the State, including renewable resources, with improved access to downstate customers.

By easing transmission constraints, the project could support more efficient use of clean-energy resources and help connect areas of future generation growth with areas of future demand growth. NYECC views this combination of downstate and broader statewide benefits as a further basis for favorable consideration of the Ridge Hill project.

5. The statewide nature of the Ridge Hill project's benefits supports consideration of a statewide load-ratio-share cost-allocation framework.

NYECC believes that the geographic distribution of Ridge Hill's anticipated benefits should inform consideration of how its costs are allocated. Our understanding is that, although the project is located within the Con Edison system, its benefits would extend beyond Con Edison's service territory. Downstate customers would gain reliability, flexibility, and access to additional generation, while generation resources elsewhere in the State would gain improved access to a major load center.

This broader distribution of benefits supports evaluating the project's costs from a statewide perspective, consistent with the CGPP's load-ratio-share framework.

Thank you for the opportunity to provide NYECC's supplemental comments regarding these timely issues of importance.

Respectfully yours,

/s/ George Diamantopoulos
George Diamantopoulos
Counsel for the NYECC

Active Parties (By Email Only)