STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 24-E-0364 - In the Matter of Proactive Planning for Upgraded Electric Grid Infrastructure.

ORDER ADDRESSING URGENT UPGRADE FILINGS

Issued and Effective: June 12, 2025

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STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held in the City of Albany on June 12, 2025

COMMISSIONERS PRESENT:

Rory M. Christian, Chair
James S. Alesi
David J. Valesky
John B. Maggiore
Uchenna S. Bright
Denise M. Sheehan
Radina R. Valova

CASE 24-E-0364 - In the Matter of Proactive Planning for Upgraded Electric Grid Infrastructure.

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(Issued and Effective June 12, 2025)

BY THE COMMISSION:

INTRODUCTION

On August 15, 2024, the Public Service Commission (Commission) issued the Order Establishing Proactive Planning Proceeding (Initiating Order). The Initiating Order was the catalyst for two sets of filings to be developed by the Joint Utilities, independently and collectively.[1] In the first set of filings, the Commission directed the Joint Utilities to propose urgent projects that require deployment prior to the completion of the overall planning process (Urgent Upgrade filings); this

[1] The Joint Utilities include Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), New York State Electric & Gas Corporation (NYSEG), Rochester Gas and Electric Corporation (RG&E), and Orange and Rockland Utilities, Inc. (O&R).

set of filings is the subject of this Order.[2] In the second set of filings, the Commission directed the Joint Utilities to propose a long-term coordinated planning process to study and identify necessary upgrades to support building electrification (BE) and transportation electrification (TE); these filings will be addressed in a subsequent Commission Order.

In November 2024, NYSEG, RG&E, Con Edison, and National Grid, (collectively, the Indicated Utilities) each submitted Urgent Upgrade filings.[3] Central Hudson and O&R filed letters indicating that they did not have any projects that fit the definition of "urgent." In a separate filing, the Joint Utilities filed a proposed approach for evaluation criteria, cost allocation, and cost recovery.[4] NYSEG and RG&E filed a supplement to their proposals.[5]

The Indicated Utilities proposed a total of 65 projects, collectively. By this Order, the Commission authorizes development of, and addresses cost recovery for 29 projects, including some projects utilizing grid-enhancing technologies, that also meet the criteria of "urgent" and declines to authorize development and cost recovery of the remaining 36 projects at this time, for the reasons discussed below. Following the

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[2] The Initiating Order determined that an upgrade is identified as "urgent" when it must begin construction before the completion of the proposed planning process developed in this proceeding. Initiating Order, p. 12.

[3] Case 24-E-0364, NYSEG-RG&E Project Review Submission (filed November 12, 2024); Case 24-E-0364, Con Edison Urgent Projects Filing (filed November 13, 2024) (Con Edison Filing); Case 24-E-0364, NMPC Urgent Upgrade Projects (filed November 13, 2024) (National Grid Filing).

[4] Case 24-E-0364, Joint Utilities Urgent Projects Criteria and Funding (filed November 13, 2024) (Joint Utilities' Filing).

[5] Case 24-E-0364, NYSEG-RG&E Updated Project Review Submission (filed November 26, 2024) (NYSEG and RG&E Filing).

issuance of this Order, National Grid may file tariff updates to implement cost recovery of the Urgent Upgrades authorized for development in this Order. Additionally, the Indicated Utilities are directed to file Urgent Upgrade Project Reports, as discussed in the body of this Order.

BACKGROUND

The Proactive Planning Proceeding emanated from the Medium- and Heavy-Duty Electric Vehicle (EV) Proceeding.[6] Comments received from stakeholders in that proceeding suggested that New York needs a significant ramp-up in infrastructure upgrades to support increasing electrification in not just the transportation sector, but the building sector as well. To ameliorate stakeholders' concerns and avoid inefficient or redundant investments and significant delays to New York's effort to electrify the transportation and building sectors, the Commission commenced this proceeding. While the Commission envisioned the long-term planning framework to be the main action for this proceeding, it was recognized that some projects should be addressed sooner rather than later.

The Initiating Order created the opportunity for the Joint Utilities to submit one-time Urgent Upgrades proposals for projects that must begin construction before the completion of the first cycle of the planning process to be developed in this proceeding. The Initiating Order recognized that certain areas of the electric grid were already facing capacity needs due to electrification of vehicles and buildings, driven by State policies. To address these capacity needs, the Initiating Order directed each of the Joint Utilities to file Urgent Upgrade

[6] Case 23-E-0070, Proceeding on Motion of the Commission to Address Barriers to Medium- and Heavy-Duty Electric Vehicle Charging Infrastructure (Medium- and Heavy-Duty EV Proceeding).

Projects, if necessary, within 90 days of the Initiating Order.[7] This period is referred to as the Urgent Upgrade project filing window.

The Commission determined that this process is a necessary addition to rate case proceedings for the following reasons. First, the Urgent Upgrade project filing window allows all utilities to propose necessary electrification upgrades on the same timeline, regardless of the timing of rate proceedings, ensuring equity for electrification across the State. Second, this process allows the Commission to consider all urgent upgrades at once, demonstrating a full picture of imminent needs while also enabling a uniform application of criteria across utilities. Finally, this process also provides an opportunity for individual entities, who may not be able to become active parties in multiple rate case filings, to engage on electrification efforts relevant to their efforts in a single proceeding.

As the Commission envisioned, this proceeding will continue the development of a unified study framework to identify ongoing statewide electrification needs through the development of a long-term Proactive Planning Framework. In the future, consideration may be given to incorporating the new, more granular study methods into rate case proceedings, but that determination will only be made once a unified approach has been developed, and the Commission has evidence that that electric system infrastructure is prepared to meet growing needs and evolve on a traditional rate case schedule.

[7] On November 8, 2024, Central Hudson, NYSEG, and RG&E requested an extension of time to file their urgent upgrade filings. In a Ruling on Extension Request, issued November 12, 2024, the Secretary to the Commission granted these requests and extended the deadline until November 27, 2024.

THE FILINGS

Joint Utilities

In response to the Initiating Order, the Joint Utilities filed a proposal outlining the specific criteria proposed to be used for evaluating projects filed by each utility that were identified by the respective utility as "urgent." The filing also details the Joint Utilities' proposed cost allocation and cost recovery methods for approved projects.

1. Evaluation Criteria

The Joint Utilities Filing contains four criteria that would be required to be met for a project to be prioritized as urgent. First, the respective utility would determine that the upgrade is necessary to enable anticipated load associated with TE and/or BE. The utility would use system forecast, granular load study, or customer requests or electrification plans, as well as relevant supporting information, to quantify the electrification load-related need.

Second, the utility would be required to demonstrate that "construction-related activities" must commence by July 1, 2026. The filing proposes expanding what constitutes "construction-related activities" as there are certain essential construction-related prerequisites.[8] To demonstrate this, the utility would: 1) demonstrate a timeline for when infrastructure upgrades should be completed; 2) provide an estimated timeline for construction-related activities for the upgrades to address the need; 3) determine when construction-related activities

[8] The Joint Utilities provide a list of examples of construction-related activities, including: incurring expenses toward project development; initiating procurement activities or execution of contracts for project-specific resources and equipment; beginning site preparation activities; placing permanent structures; beginning construction equipment staging; or beginning work crew contracting or mobilization. Joint Utilities Filing, p. 7.

should begin to meet the identified need, with this criterion automatically met if there is a need for capacity by 2026; 4) explain the consequences of project delay; and 5) describe relevant tools or processes used for project selection and prioritization.

Third, the utility would be required to demonstrate that the project has a high degree of certainty based on location, magnitude, and timing of the need, as well as demonstrate how the utility would manage stranded asset risk. The Joint Utilities propose to leverage up-to-date load forecasts, actual customer load requests, existing capacity, impact of relevant laws, and information supporting a location-specific need (e.g., proximity to major travel corridors, or inclusion in a State or Federal plan) to demonstrate the certainty of the need in an area.

Finally, the fourth criterion would require the utility to demonstrate how the design of the upgrade has considered the risks and benefits of both sizing and timing of the project. The projects would be required to be sized to consider the impacts of over- or under-building by considering future load growth and uncertainties in a given area. The utility would also be required to discuss the risks of delayed or no action as well as provide details regarding the benefits and risks of early action.

2. Cost Allocation and Cost Recovery

The Joint Utilities propose to maintain cost allocation principles consistent with existing rate case cost recovery requirements and/or tariffs. Utility-specific details are covered within the individual utility filings.

Generally, for cost recovery, the Joint Utilities propose to recover the incremental revenue requirement associated with Urgent Upgrade Projects through a surcharge mechanism until such time the projects are included in base rates in the

utility's next rate proceeding or alternatively continue to recover the incremental costs through the surcharge mechanism. Further, the Joint Utilities propose that they should be given the option to either include 100 percent of construction work in progress (CWIP) in rate base on a current basis or be able to accrue allowance for funds used during construction (AFUDC) until the project is placed into service. The Joint Utilities assert that this approach would allow the Commission to enable them to move forward expeditiously.

Individual Utility Filings

The following sections provide a summary of the urgent upgrade project proposal filings submitted by each utility. Full descriptions of each proposed project and a summary table can be found in Appendix A and are incorporated herein by reference. Additionally, the individual utilities responded to information requests (IR) sent by Department of Public Service staff. The IR responses on which the Commission relied are included as Appendix C.

1. Con Edison

Con Edison's filing includes proposals for nine projects. The filing describes the nine projects as being comprised of four primary feeder projects, three area substation and sub-transmission projects, and two distribution system programs. The estimated capital expenditures of the nine projects would be $854.9 million and the proposed projects would provide 485 megawatts (MW) of incremental system capacity which can interconnect TE and BE projects.

In its filing, Con Edison states that it traditionally forecasts system and network loads using econometric measures as well as bottom—up network analysis using near-term customer load requests and numerous other data sets. While the local conditions provide a high degree of certainty of locations where

electrification load is likely to materialize, they are also likely to result in areas of large, concentrated load. Con Edison further adds that this traditional load forecast does not fully address the localized needs of emerging EV loads, which tend to cluster in specific locations because of local conditions. The use of this traditional load forecast results in the need for more granular load projections to address expected EV load.

Using a granular load study, Con Edison identified 14 initial TE hotspots with high vehicle concentrations today, and where it believes large EV charging load is likely to materialize in the future to comply with State and local policies. For each of the 14 hotspots, Con Edison developed an expected load by creating a granular spatial and temporal bottom-up EV load projection model, which assumed compliance with all policy mandates. After further analysis, including layering in all forecasted load, such as BE, to the EV projections, Con Edison determined that four of the 14 hotspots require urgent near-term distribution system investments, and in some cases, sub-transmission and area station investments. These four hotspot locations are 1) Zerega Avenue, 2) Hunts Point, 3) East New York, and 4) Steinway (LaGuardia). Con Edison states that at each of these hotspot locations, it has identified significant customer EV charging activity ranging from early customer interest to projects under construction and in operation, which provides validation from an independent data set that load is already materializing at these locations today.

For these four hotspots, Con Edison proposes four primary feeder projects and three substation and sub-transmission projects. These primary feeder projects would entail the installation of new distribution feeders, and associated cubicle work, to supply the electrification hotspots. Specifically, Con

Edison plans to install six distribution feeders for each the Zerega Avenue and Hunts Point hotspots, with three feeders energized by 2027 for both hotspots; eight distribution feeders for the Steinway (LaGuardia) hotspot, with two feeders energized by 2027 and the remaining six in 2028; and three distribution feeders for the East New York hotspot, with one feeder energized by 2027. The remaining feeders for Zerega Avenue, Hunts Point, and East New York hotspots are expected to be energized by 2030.

To mitigate the risks associated with the projected load growth because of the electrification loads at Zerega Avenue and Hunts Point, Con Edison proposed three substation and sub-transmission projects that would entail the installation of a new substation power transformer and sub-transmission supply feeder. Specifically, Con Edison plans to establish a fifth 138/13kV transformer at Parkchester No. 1 substation, to be supplied by a new 138kV feeder from East 179th Street substation; a fourth 138/13kV transformer at Parkchester No. 2 substation, to be supplied by installing 138kV tertiary feeder from an existing 138kV feeder; and a fifth 138/13kV transformer at Mott Haven 13kV substation, to be supplied by 138kV feeder from Mott Haven 345kV substation.

Regarding cost allocation and cost recovery, Con Edison requests that the Commission authorize the recovery of costs associated with the development and construction of the urgent upgrade projects through a surcharge or base rates, depending upon the timing of the project being placed into service. Finally, Con Edison proposes the costs be allocated consistent with their existing tariffs.

2. National Grid

National Grid's filing includes proposals for 46 projects, with capital expenditures totaling $470.1 million for 547.9 MW of new system capacity. The 46 projects are comprised

of five highway service area EV charging upgrade projects, a grid-enhancing technology program utilizing mobile energy storage, six TE projects, eight school bus electrification projects, fourteen multiple-occupancy BE projects, six customer-driven BE projects, and six forecast-driven BE projects. National Grid laid out the load forecasting methodology it used within its 2024 Rate Case filing.[9] National Grid used historical load data, econometric models, industry forecasts, customer requests, and weather variation data in its load forecast. Determination of the resulting needs and development of the associated solutions for the projected load growth relied on traditional transmission and distribution planning tools and methodologies.

Regarding cost recovery, National Grid proposes to defer the revenue requirement impact of the costs associated with the projects and to recover them through a surcharge until such time that they are reflected in base rates. National Grid indicates the projected costs associated with the urgent upgrade projects include incremental operating expenses, property taxes, return on capital investments (including cost of removal), and depreciation expense. In addition, National Grid proposes a surcharge to provide for recovery of deferred operating costs incurred prior to the surcharge effective period, as well as actual and forecast revenue requirement associated with the capital investments placed into service. Further, National Grid proposes that any over/under collections would be reconciled annually and be subject to carrying cost at its pre-tax weighted average cost of capital.

[9] Case 24-E-0322, National Grid – Rate Proceeding, Initial Testimony of Electric Load Forecast Panel (filed May 28, 2024).

3. NYSEG and RG&E

In their updated filing, NYSEG and RG&E include proposals for ten projects, with capital expenditures forecasted at $554.2 million for 257.7 MW of new system capacity, collectively. The ten projects are comprised of seven economic development and electrification projects in NYSEG's territory and three economic development and electrification projects in RG&E's territory. The estimated expenditures for the seven NYSEG projects are forecasted at $467.9 million for 125.2 MW of new system capacity. The estimated expenditures for the three RG&E projects are forecasted at $86.3 million for 132.5 MW of new system capacity.

NYSEG and RG&E performed a load forecast using internal econometric forecasts in combination with existing customer load requests, as well as data from the New York Independent System Operator, Inc. Gold Book to quantify forecasted coincident peak load at the service division level. These division-level forecasts were disaggregated at both the substation level and the circuit level, by proportionally assigning load share at peak load. NYSEG and RG&E are currently developing an enhanced load forecasting methodology for future use. The enhanced load forecast will incorporate locational data for known heat pump installations, EV chargers, and EV purchases to improve forecasting accuracy and precision with respect to electrification trends.

Based on the load forecasts, NYSEG and RGE propose projects to upgrade substation, transmission, and distribution systems within their territories. These proposed upgrades include reconductoring transmission and distribution lines, new circuits, and circuit ties, substation upgrades including higher capacity power transformers enabling increased load transfers, as well as greater substation reliability, by providing more robust

circuit breaker configurations. NYSEG and RG&E state that, in addition to the electrification benefits, each of these projects would provide additional capacity that, if approved, would have immediate benefits for enabling the advancement of economic development projects that otherwise may not be supported by existing infrastructure.

Regarding cost allocation and cost recovery, NYSEG and RG&E propose that the revenue requirement impacts associated with urgent upgrade projects be recovered through an electrification capacity surcharge, until the projects are included in base rates. NYSEG and RG&E indicate the costs associated with the urgent upgrade projects include the return on assets, depreciation expense, operating and maintenance expenses, and property taxes. Additionally, NYSEG and RG&E request that they be allowed to recover 100 percent of CWIP in rate base, or a similar cash flow recovery mechanism, while the projects are in construction, as opposed to accruing carrying costs through AFUDC until the project is placed into service. NYSEG and RG&E indicate such treatment is necessary as the investments associated with the urgent upgrade projects would strain their cash flow and potentially impact their credit metrics.

Further, NYSEG and RG&E request accelerated depreciation for the urgent upgrade assets by which they would be allowed to recover their assets once the investment period commences, which is the start of construction, as opposed to the typical recovery period which would be from the start of when an asset is placed into service. NYSEG and RG&E propose to reconcile any over/under collections annually and include those collections in the following years surcharge, inclusive of carrying costs at the applicable pre-tax weighted average cost of capital for both NYSEG and RG&E. Finally, NYSEG and RG&E propose that the electrification capacity surcharges be allocated by

service class, based on the delivery service revenues in the current rate plan. The allocated amounts would then be recovered on a per-kWh basis for non-demand billed customers, a per-kW basis for demand billed customers, and on an as-used demand basis for both standby service customers and optional demand service customers.

NOTICES OF PROPOSED RULE MAKINGS

Pursuant to the State Administrative Procedure Act (SAPA) §202(1) Notices of Proposed Rulemakings (Notices) for each utilities' filing were published in the State Register on January 8, 2025, including: Joint Utilities [SAPA No. 24-E-0364SP1]; National Grid [SAPA no. 24-E-0364SP2]; NYSEG and RG&E [SAPA No. 24-E-0364SP3]; and Con Edison [SAPA No. 24-E-0364SP4]. The time for submission of comments pursuant to the Notices expired on March 10, 2025.

The Commission received 79 sets of comments on the Urgent Upgrades filings. A full summary of comments, organized by topic, can be found in Appendix B, while certain comments requiring discussion and action are addressed in the Comments section below, or in the body of the Order.

COMMENTS

Joint Utilities Filing

1. Evaluation Criteria

Commenters provided feedback on the proposed evaluation criteria as follows. International Council on Clean Transportation (ICCT), New York State School Boards Association (NYSSBA), and Daimler Truck North America (Daimler) support the proposed criteria, while ICCT also considers the expansion of eligibility related to project timing, from the start of when construction commences to the start of "construction related activities," necessary to provide certainty in timing and project

development. Multiple Intervenors (MI), New York City (NYC), and Environmental Defense Fund (EDF) contend that additional detail is required to increase the stringency of the criteria. MI notes that the approval of large projects outside of a rate case necessitates a higher level of justification. NYC states that the utilities should better specify the methods with which a project is justified, and a description of why other methods were not relied on. EDF recommends changes to nomenclature in the proceeding to better incorporate non-wires solutions, while also specifying a stronger requirement to tie policy compliance to the planning process. EDF also suggests future steps in the proceeding incorporate more quantification of criteria, including reliability metrics.

Numerous comments from NYC and MI questioned the need to evaluate projects outside of the rate case, the need to clarify which proposed projects may overlap with rate cases and how they interact with previously approved projects, and to consider the impact of waiting for rate case proceedings instead of seeking approval through the Proactive Planning process.

2. Cost Recovery and Allocation

Over 40 commenters filed comments in support of the utilities' cost allocation and recovery methodology, finding that it is necessary in order to begin work on urgent projects. EDF recommends changes to NYSEG and RG&E's cost recovery proposal, while MI recommends rejecting any cost recovery for the proposed projects outside of rate proceedings, and NYC recommends avoiding surcharges for Con Edison's projects considering many of the projects are also included in rate proceedings.

Utility Proposals

Enterprise Mobility, Mountaintop Villas LLC, Gage Zero, and NYSSBA support the urgent upgrades filings, noting the need for increased charging on travel corridors, the need to keep pace

with electrification demand, and the desire to support the transition to electric school buses.

NYC questions the need for this proceeding, noting that it overlaps with work in the Coordinated Grid Planning process,[10] while NYC and MI question the need to undertake efforts in this proceeding, given rate case proceedings underway.

1. Con Edison Filing

The Alliance for Transportation Electrification, Ai Air Conditioning Group, Highland Electric Fleets, IONNA, LLC (IONNA), Daimler, Volvo, and CALSTART support the approval of Con Edison's urgent projects, noting the growth of electric vehicle charging demand and the concentration of fleets in downstate New York. Additional commenters submitted comments in support of individual projects, noting the specific value to fleets and buildings in the New York City area of increased capacity for electrification. NYC suggests all reviews occur within ongoing rate case proceedings.

2. National Grid Filing

EVgo, Phillips Lytle LLC, IONNA, Daimler, and CALSTART support approval of National Grid's urgent projects, acknowledging the benefits to housing development and high-speed travel along corridors in National Grid's territory. Additional commenters provided support for enhanced capacity on the New York State Thruway, either through individual station upgrades or mobile energy storage projects.

3. NYSEG and RG&E Filing

The Commission received dozens of individual support letters requesting approval of various projects within NYSEG and

[10] 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 (issued August 17, 2023)(Coordinated Grid Planning Proceeding).

RG&E's territory. These letters note the value of increasing capacity in certain areas and identify the benefits that could arise from new electrification potential. Daimler provides general support to NYSEG's filings, while CALSTART suggests rejecting the proposals given a lack of sufficient detail in the filing.

LEGAL AUTHORITY

The Public Service Law (PSL) provides the Commission with broad authority to direct actions to ensure that energy supplies and transmission resources are adequate to meet demand in a manner that is protective of the environment. In particular, PSL §4(1) expressly imbues the Commission with "all powers necessary or proper to enable [the Commission] to carry out the purposes of [the PSL]" which include, without limitation, the provision of safe and adequate service at just and reasonable rates,[11] environmental stewardship, and the conservation of resources.[12]

Further, PSL §5(1) provides that the "jurisdiction, supervision, powers and duties" of the Commission extend to the "manufacture, conveying, transportation, sale or distribution of ... electricity." Under PSL §5(2), the Commission is required to "encourage all persons and corporations subject to its jurisdiction to formulate and carry out long-range programs, individually or cooperatively, for the performance of their

[11] See Int'l Ry. Co. v. Pub. Serv. Comm'n, 264 A.D. 506, 510 (1942).

[12] PSL §5(2); see also Consolidated Edison Co. of N.Y., Inc. v. Pub. Serv. Comm'n, 47 N.Y.2d 94 (1979) (overturned on other grounds) (describing the broad delegation of authority to the Commission and the Legislature's unqualified recognition of the importance of environmental stewardship and resource conservation in amending the PSL to include §5).

public service responsibilities with economy, efficiency, and care for the public safety, the preservation of environmental values and the conservation of natural resources."

Section 65(1) of the PSL grants the Commission authority to ensure that "every electric corporation and every municipality shall furnish and provide such service, instrumentalities and facilities as shall be safe and adequate and, in all respects, just and reasonable." The Commission has further authority under PSL §66(5) to prescribe the "safe, efficient and adequate property, equipment and appliances thereafter to be used, maintained and operated for the security and accommodation of the public" whenever the Commission determines that the utility's existing equipment is "unsafe, inefficient or inadequate." Moreover, PSL §66(2) provides that the Commission shall "examine or investigate the methods employed by ... persons, corporations and municipalities in manufacturing, distributing and supplying ... electricity ... and have power to order such reasonable improvements as will best promote the public interest, preserve the public health and protect those using such ... electricity." The actions taken in this Order fall within the scope of this authority.

DISCUSSION

The Initiating Order determined that projects approved through this proceeding must meet stringent criteria for need and urgency, among other considerations. The determinations below reflect consideration of the evaluation criteria proposed by the Joint Utilities, with only the most advanced, certain, urgent, and cost-effective projects receiving approval. The Commission finds that the implementation of the criteria is stringent enough to ensure projects that do not provide sufficient justification of need, risk mitigation, and urgency are not funded through the

Urgent Upgrades process and therefore adopts the evaluation criteria proposed by the Joint Utilities. Each authorized project meets a near-term electrification need, manages risk, provides a cost-effective design, and must be initiated through this Order – which provides certainty of funding to begin construction-related activities - to avoid delays of policy-driven electrification.

Consistent with §7(2) and §7(3) of the Climate Leadership and Community Protection Act (CLCPA) (Chapter 106 of the Laws of 2019), the Commission finds that the actions taken herein will neither interfere with the attainment of the statewide greenhouse gas (GHG) emission limits established under the CLCPA nor disproportionately burden a Disadvantaged Community. The projects approved herein will enable the electrification of buildings and the installation of electric vehicle charging stations, thereby assisting the State's efforts to reduce GHG emissions. While temporary and minimal local impacts might occur related to necessary construction activities, the electrification projects will not disproportionally burden Disadvantaged Communities and will have an overall positive benefit by offsetting the use of fossil fuels and GHG emissions within those communities. We also note that the action herein, as it relates to our policy to proactively identify upgrades to utility distribution facilities and affects the management of utility functions, constitutes a Type II action under the State Environmental Quality Review Act (See, 6 NYCRR 617.5(c)(13) and (33); and 16 NYCRR §7.2(b)(2)).

Projects which are not approved for development through this Order may still have value, as noted in the individual project details in Appendix A.[13] Those projects may still be

[13] Appendix A is incorporated herein by reference.

pursued outside of this process as part of a rate case, through the successive Proactive Planning Framework Study Process, or through another relevant generic proceeding. Importantly, the Commission reviewed all four criteria simultaneously for each project and did not give one single criteria priority over others. Projects granted approval through this process are deemed to have met all four adopted criteria, while projects that are not approved failed to meet at least one criterion. Details on individual criteria evaluations can be found in Appendix A.

Joint Utilities

The Commission agrees with the evaluation criteria proposed in the Joint Utilities' filing. The four criteria cover the breadth of detail requested in the Initiating Order and allow for a comprehensive evaluation of individual projects.

The Commission finds the more expansive definition of construction as "construction-related activities" to be a useful change that better reflects the essential development steps for electric system upgrades. Given the labor and equipment requirements for such work, including two to three year wait times for transformers, maintaining a strict definition of construction would severely limit the ability of projects to be approved under this proceeding, running counter to the purpose of initiating needed projects on their necessary timelines.

Cost Recovery and Allocation

The Joint Utilities propose to recover the incremental revenue requirement associated with Urgent Upgrade Projects through a surcharge mechanism until such time that the projects are included in base rates in a future rate proceeding. Specifically, the Joint Utilities propose the following costs be recovered via the surcharge mechanism: return on capital investments, depreciation expense, incremental operating and maintenance expenses, and property taxes. In addition, NYSEG and

RG&E propose to recover 100 percent of CWIP in rate base while the projects are in construction and requests accelerated depreciation for the urgent upgrade assets. Further, National Grid, NYSEG, and RG&E each propose any over/under collections be reconciled annually and be subject to carrying cost at the pre-tax weighted average cost of capital.

MI and NYC both expressed their opinion that the Commission should not provide any cost recovery outside of rate cases. However, the Commission is not persuaded by their arguments. Timely cost recovery will enable the utilities to make the necessary investments in their infrastructure in order to support increasing electrification in the transportation and building sectors.

Given that these projects have been identified as necessary to further New York's effort to electrify the transportation and building sectors, we have determined that it is appropriate to provide the Joint Utilities recovery of the costs associated with these investments once they are placed into service.

For National Grid, until such time that the investments can be reflected in base rates, we authorize the implementation of a surcharge to recover the revenue requirement impact of the investments associated with the Urgent Upgrades authorized in whole or in part by this order.[14]

[14] This shall include the Cables 14 and 15K 2929 Main Street Sub-transmission project and the Cables 10H and 12H 2633 Delaware Avenue project, which have estimated in-service dates of June 2024 and December 2024. These projects have met the criteria for an urgent upgrade project and have not been reflected in the company's base rates. Further, the Commission notes that in National Grid's pending electric rate proceeding, the filed Joint Proposal does not include costs associated with these projects. Case 24-E-0322 et. al., National Grid – Rate Proceeding, Joint Proposal (filed April 25, 2025).

The revenue requirement impact shall be limited to the return on capital investments (including cost of removal), depreciation expense, and the incremental operating expenses associated with the capital expenditures for the urgent upgrade projects.[15] Although National Grid also sought to recover the property taxes related to these investments, we find such treatment is not necessary as National Grid's existing rate plan includes a provision by which the company is allowed to defer 90 percent of the difference between the amounts provided for in rates and actual property taxes.[16] Moreover, there is typically a lag between the time an investment is placed into service and when it is reflected in a utility's property tax assessment, thus reducing the impact of any incremental property taxes associated with these investments.

Finally, National Grid's current rate plan contains an Electric Net Utility Plant and Depreciation Expense Reconciliation Mechanism. The mechanism requires National Grid to defer the difference between the actual electric average net utility plant and depreciation expense revenue requirement and the target electric average net utility plant and depreciation expense revenue requirement in the event the actual revenue requirement is less than the target, on a cumulative basis over the term of the rate plan. Since the urgent upgrade projects authorized for development by this order were not considered in the development of the electric average net utility plant and depreciation expense contained in the target revenue requirements

[15] Operating expenses associated with the capital expenditures are limited to expensed items that are necessary to complete the capital project and include activities such as: conversions of transformer operating voltages, transfers of equipment, and installation of ancillary new hardware.

[16] Case 20-E-0380, National Grid – Rates Proceeding, Order Adopting Terms of Joint Proposal, Establishing Rate Plans and Reporting Requirements (issued January 20, 2022), p. 73.

of the company's current rate plan, they are to be excluded from the comparison until the projects are recovered through base rates.

The National Grid surcharge recoveries shall be initially allocated to service classes based on using the appropriate transmission and demand allocators as contained in the utility's most recent cost of service study. The allocated amounts shall be recovered on a per kWh basis for non-demand billed customers, on a per-kW basis for demand billed customers, and on an as-used demand basis for standby service customers and optional demand service customers.

National Grid is directed to file tariffs implementing the surcharge recovery within 90 days of the issuance of this Order. The tariffs are to go into effect on a temporary basis on October 1, 2025. The newspaper publication requirements for these tariffs are waived because stakeholders have had the opportunity for notice and comment. The surcharge is to be updated annually, on not less than 15 days' notice. The updated surcharges shall be developed to reconcile estimated over/under collections from the current period, including carrying charges at National Grid's pre-tax weighted average cost of capital and to include the revenue requirement associated with capital investments forecasted to be placed into service in the upcoming year.

As it relates to Con Edison, since the estimated in-service dates of the urgent upgrade projects being authorized in this Order are in calendar years 2028 and 2030, we find that a surcharge mechanism is not necessary at this time. The costs associated with these projects can be reflected in the company's

pending rate proceeding and in future rate proceedings.[17] In the event the urgent upgrade projects authorized for development by this Order were to be placed into service prior to them being fully reflected in base rates, Con Edison is authorized to make a tariff filing to implement a surcharge mechanism to recover the return of the asset, or depreciation, and the return on the investment of the projects until such time that they are fully reflected in base rates. Con Edison may file tariffs to go into effect on a temporary basis on not less than 15 days' notice. The newspaper publication requirements for these tariffs, as required, will be waived because stakeholders have had the opportunity for notice and comment. The initial surcharge shall be developed to recover the estimated revenue requirement associated with capital investments forecasted to be placed into service in the ensuing year. The revenue requirement impact shall be limited to the return on capital investments (including cost of removal), depreciation expense, and the incremental operating expenses associated with the capital expenditures for the urgent upgrade projects. The surcharge is to be updated annually, on not less than 15 days' notice. The updated surcharges shall be developed to reconcile estimated over/under collections from the current (i.e., initial) period, including carrying charges at Con Edison's pre-tax weighted average cost of capital and shall include the estimated revenue requirement associated with capital investments forecasted to be placed into service in the ensuing year.

[17] Cases 25-E-0072 and 25-G-0073, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric and Gas Service.

NYSEG and RG&E's existing rate plans expire in April 2026 and the estimated in-service dates of the urgent upgrade projects being authorized in this Order are in calendar years 2028 and 2029. Thus, similar to Con Edison, we find that a surcharge mechanism is not necessary at this time. The costs associated with these projects can be reflected in a future rate proceeding prior to the estimated in-service dates of these projects.

In the event the urgent upgrade projects were to be placed into service prior to them being fully reflected in base rates, NYSEG and RG&E are authorized to make a tariff filing to implement a surcharge mechanism to recover the revenue requirement impact of the projects until such time that they are reflected in base rates. NYSEG and RG&E may file tariffs to go into effect on a temporary basis on not less than 15 days' notice. The newspaper publication requirements for these tariffs, as required, will also be waived because stakeholders have had the opportunity for notice and comment. The initial surcharge shall be developed to recover the estimated revenue requirement associated with capital investments forecasted to be placed into service in the ensuing year. The revenue requirement impact shall be limited to the return on capital investments (including cost of removal), depreciation expense, and the incremental operating expenses associated with the capital expenditures for the urgent upgrade projects. The surcharge is to be updated annually, on not less than 15 days' notice. The updated surcharges shall be developed to reconcile estimated over/under collections from the current (i.e., initial) period, including carrying charges at NYSEG and RG&E's pre-tax weighted average cost of capital and shall include the estimated revenue requirement associated with capital investments forecasted to be placed into service in the ensuing year.

Regarding NYSEG and RG&E's request to recover 100 percent of CWIP in rate base while the projects are in construction and to accelerate the depreciation of the urgent upgrade assets, we find that such treatment is not warranted and deny their request. NYSEG and RG&E contend that such treatment is necessary due to cash flow and credit metric concerns. However, both NYSEG and RG&E are currently rated "A-" by Standard and Poor's (S&P) and "Baa1" by Moody's and have stable credit outlooks. In addition, as discussed later in this Order, we are authorizing only two of the ten proposed urgent upgrade projects, which significantly reduces the cash flow and potential credit metric impact that these investments would have on NYSEG and RG&E. Furthermore, S&P's funds from operations to debt metric and Moody's cash from operations pre-working capital to debt metric are only one of several factors that each of these rating agencies use to determine a company's overall rating, thus authorizing the requested treatment would most likely not result in a change in the rating or outlook for either company.

Individual Utility Filings

The following sections, and Table 1, summarize the list of projects from each utility filing that have met the criteria of the Initiating Order and are hereby authorized. Full descriptions of the individual project evaluations can be found in Appendix A and are incorporated herein by reference.

Table 1

Utility	Number of Projects	Estimated Capital Costs ($ Millions)	Overall Capacity Increase (MW)	Cost per MW ($ Millions)
Con Edison	5	439.9	380	1.2
National Grid	22	126.0	184.8	0.7
NYSEG	1	37.1	30	1.2
RG&E	1	33.2	47	0.7
Total	29	636.2	641.8	
Weighted Average				1.0

Con Edison

The Commission finds that five of the nine projects proposed by Con Edison meet the criteria for approval under this proceeding. The five projects have in-service dates between January 2028 and January 2030. These in-service dates are driven by extended procurement timelines and complex engineering and construction needs in and around New York City. Cumulatively, the five projects total capital costs are estimated to be $439.9 million, and account for 380 MW of new capacity on the system.

Table 2

Con Edison				
Name of Project	In-Service Date	Estimated Capital Costs ($ Millions)	Overall Capacity Increase (MW)	Cost per MW ($ Millions)
Zerega Ave	1/1/2030	116.6	61	1.9
Hunts Point	1/1/2030	105.0	82	1.3
Parkchester No. 1	1/1/2030	126.9	73	1.7
Parkchester No. 2	1/1/2028	44.0	81	0.5
Mott Haven	1/1/2030	47.3	83	0.6
Total		440.0	380	
Weighted Average				1.16

The approved projects include new capacity at Zerega Avenue to support one of the most densely populated bus depots in the country, as well as essential upgrades to enable impactful decarbonization efforts at Hunts Point. Combined with the other capability improvements on the sub-transmission system, which bring much needed capacity to areas facing immediate constraints, this portfolio of projects provides significant value to New York ratepayers.

National Grid

The Commission finds that 22 of the 46 projects proposed by National Grid meet the criteria for approval. The 22 projects capital costs, including operating expenses associated with the capital expenditures and cost of removal, are estimated to be $126.0 million, and provide for 184.4 MW of new capacity on the system. The projects include an innovative bridge-to-wires approach using grid-enhancing technologies.

Table 3

National Grid				
Name of Project or Program	Estimated In-Service Date	Estimated Capital Costs ($ Millions)	Overall Capacity Increase (MW)	Cost per MW ($ Millions)
Mobile Battery Energy Storage (Program)	12/1/2026	21.6	4.4	4.9
Angola Reconductoring	12/1/2026	0.5	10.9	0.05
Wilton Breaker	2/1/2029	6.0	49.0	0.1
Cortland	6/1/2027	0.1	15.0	0.01
C096326	3/1/2026	0.3	5.1	0.06
C093619	10/1/2027	2.8	10.0	0.28
C092845	3/1/2026	0.5	0.9	0.6
C092948	3/1/2026	0.3	1.0	0.3
C092949	3/1/2026	0.3	1.0	0.3
C092951	3/1/2026	0.3	1.0	0.3
C015754	12/1/2028	15.0	2.2	6.8
C092952	3/1/2026	0.3	1.0	0.3
C095804	3/1/2026	2.8	3.5	0.8
C094748 & C094749	3/1/2027	1.6	1.5	1.0
C092982, C092126, C092646	12/1/2024	5.9	2.5	2.4
C092111	6/1/2024	1.7	2.2	0.8
C090952 & C092963	8/1/2025	0.4	2.0	0.2
Station 3012 Rebuild	7/1/2026	33.2	18.8	1.6
C094790 Service Extension	7/1/2025	2.8	4.1	0.7
Hancock 2 D Line Upgrade	11/1/2026	2.8	3.7	0.8
Sand 2 D Line Upgrade	11/1/2026	2.8	5.0	0.6
Delameter Substation Rebuild	8/1/2028	24.0	40.0	0.6
Total		$126.0	184.8	
Weighted Average				0.7

The portfolio of approved projects within the National Grid territory, described in Appendix A, includes a number of small projects that enable a diverse set of electrification projects across New York State. Other projects include utilizing energy storage to provide increased capacity for New York State Thruway charging, and relieving constraints in high-value areas upstate.

NYSEG and RGE

The Commission finds that two of the ten projects proposed by NYSEG and RG&E meet the criteria for approval. The two projects include one in NYSEG's service territory and one in RG&E's service territory. NYSEG's project has an in-service date of March 2029, has an estimated capital cost of $37.1 million, and provides 30 MW of new system capacity. The approved project in RG&E territory has an in-service date of August 2028, has an estimated capital cost of $33.2 million, and accounts for 47 MW of new system capacity.

Table 4

NYSEG and RG&E				
Company and Name of Project	In-Service Date	Estimated Capital Costs ($ Millions)	Overall Capacity Increase (MW)	Cost per MW ($ Millions)
NYSEG Kents Falls	3/1/2029	37.1	30	1.2
RG&E Station 124 (Penfield)	12/1/2028	33.2	47	0.7
Total		70	77	
Weighted Average				1.0

NYSEG's proposed Kents Falls project provides urgent capacity increases to a large expanding manufacturing facility,

thereby creating hundreds of new jobs within a disadvantaged community in the far northern region of New York State. This project will enable significant heat pump electrification, while simultaneously providing additional capacity, enabling the facility's expansion. RG&E's proposed Station 124 project also provides capacity increases for the growth of existing loads in the Rochester area, which also includes significant electric vehicle charging.

Reporting Requirements

As the first proceeding of this kind, and to ensure that ratepayer funds are being used appropriately, the Commission is interested in receiving updated information about the projects authorized in this Order during the project development period, and when the projects are completed. Therefore, the Indicated Utilities are required to file status reports every quarter, and more frequently if requested by Department of Public Service Staff, as well as when the projects are completed. The reports shall include the following information, at a minimum, for each of the projects authorized in this Order:

1. budget changes or cost overruns that require management approval;
2. schedule changes, including estimated in-service dates, and the reason for the changes;
3. a comparison of the original projected budget and the actual capital expenditures, and the reason for any differences;
4. the estimated total quantity of work completed under the projects. In the event that the work cannot be quantified, major tasks completed shall be provided;
5. a comparison of the projected and actual in-service date; and
6. upon project completion, the Indicated Utilities will also include a brief report on each completed project with

details on lessons learned, how any deviations on project timing, equipment procurement, costs, and risks were addressed, and how updated loads and load forecasts align with those found in the initial project proposal.

If, for any reason, development of any of the authorized projects is stopped or paused for more than 90 days, the developing utility shall file an updated report, including the requirements outlined above, and provide an update of the development being stopped, explaining why and whether development on the project will re-start at a later date.

CONCLUSION

The Commission instituted this proceeding to ensure that electric system infrastructure constraints would not hinder important electrification efforts undertaken in response to State policies. This Order represents the first major effort in this proceeding to proactively address grid needs in areas already experiencing constraints now and in the immediate future. Additional efforts will be undertaken through this proceeding as part of the Framework filing process, which seeks to adopt new planning methodologies that unify electrification planning efforts across the utilities. Taken in combination, the work in this proceeding will ensure continued progress toward decarbonization through electrification.

The Commission orders:

1. Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation shall implement the cost recovery mechanisms, as outlined and discussed in the body of this Order.

2. Niagara Mohawk Power Corporation d/b/a National Grid shall file tariff amendments to implement cost recovery of the projects authorized for development in the body of this Order, on not less than 15 days' notice, to be effective October 1, 2025, on a temporary basis, consistent with the discussion in the body of this Order.

3. Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation shall file quarterly and end of project status reports, consistent with the discussion in the body of this Order.

4. Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation shall file an updated report if any of the authorized projects are stopped or paused for more than 90 days, as discussed in the body of this Order.

5. In the Secretary's sole discretion, the deadlines set forth in this Order may be extended. Any request for an extension must be in writing, must include a justification for the extension, and must be filed at least three days prior to the affected deadline.

6. The requirements of Public Service Law §66(12)(b) and 16 NYCRR §720-8.1, as to newspaper publication for the tariff filings required in Ordering Clause No. 2, are waived.

7. Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation shall file tariff amendments, on not less than 15 days' notice, to be effective on a temporary basis, in the event the urgent upgrade projects authorized for development

are placed into service prior to being fully reflected in base rates, consistent with the discussion in the body of this Order.

8. The requirements of Public Service Law §66(12)(b) and 16 NYCRR §720-8.1, as to newspaper publication for the tariff filings made in compliance with Ordering Clause No. 7, are waived.

9. This proceeding is continued.

By the Commission,

(SIGNED) MICHELLE L. PHILLIPS
Secretary

FUNDING DETERMINATIONS FOR PROPOSED PROJECTS

The Commission considered each project proposed by the Indicated Utilities using the criteria discussed and approved in the body of this Order. A brief summary of each project and the analysis of the four criteria are provided below. As described in the body of this Order, for a project to be authorized for development, it must meet all four of the criteria. For each authorized project, the Commission explains why it has met all four criteria. If a project fails any of the four criteria, it is not authorized. For each project that has not been authorized, the Commission provides an explanation for only the criterion that the project failed. The Commission also notes that a number of the filings were made confidentially, to the extent that a project name is confidential it has been denoted with a project number, additionally specific details of a project that were marked confidential have been omitted. If any of the utilities have questions regarding the funding determinations, they are directed to reach out to Department of Public Service Staff for clarification.

Table 5 provides a summary of all of the projects proposed by the Indicated Utilities.

Table 5

Utility	No. of Projects or Programs	Estimated Cost ($ Millions)	Capacity Increase (MW)	Cost per MW ($ Millions)
Con Edison	9	854.9	485	1.8
National Grid	46	470.1	547.9	0.9
NYSEG	7	467.9	125.2	3.7
RG&E	3	86.3	132.5	0.7
Total	65	1879.2	1290.6	1.5

Con Edison Urgent Upgrade Projects – Authorized Proposals

Zerega Avenue Electrification Hotspot

Con Edison proposed the Zerega Avenue Electrification Hotspot project to provide capacity for the Zerega Avenue Electrification Hotspot.[1] In its filing, Con Edison stated that there is a high degree of certainty of the need for this project. The Zerega Avenue Electrification Hotspot supports the electrification of multiple types of fleets, serving a total of almost 15,000 estimated commercial fleet vehicles. Given that these vehicles will electrify in the coming years, and that several specific customers have electrification plans in various stages of development from exploratory stage to electric vehicles already operating on the road, Con Edison is confident that this project is required to serve future expected load in the timeframe proposed.

Zerega Avenue is located in an area of interconnecting thoroughfares. There are over twenty fleet depots and service centers in the area serving over serving over 5,000 medium- and heavy-duty vehicles (MHDVs) and which are projected to add over 60 MW of load in the next 20 years. The granular study projections included in Con Edison's filing show load in the Zerega Avenue Electrification Hotspot materializing in 2025 and growing to 11 MW by 2028. Given that existing feeders do not have the capacity or configuration capable of supporting this incremental electrification load growth in the hotspot, this project meets the urgency criteria. Also, the Electric Power Research Institute's (EPRI's) eRoadMap tool shows this area as one of the densest areas of expected electrification by 2030.[2]

[1] Con Edison Filing, pp. 26-36.

[2] Con Edison Filing, p. 30.

The upgrade in the Zerega hotspot upgrade is required to enable TE, which accounts for most of the total incremental load needed to be served by the new feeders. Other loads, including electrification of buildings in this area that can have high loads exceeding the capability of the 4 kV distribution system, would also be supported by these new network feeders. As such, this project would also support building decarbonization and State goals and regulations by providing capacity for customers to connect to the grid. The Commission authorizes development of the Zerega Avenue Electrification Hotspot because it meets the overall urgency criteria, discussed below. Additionally, it would address operational uncertainty and charging availability concerns in New York City.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. Load associated with transportation electrification is driving the need for the Zerega Avenue Electrification Hotspot.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. Currently, all the feeders serving load in the Zerega Electrification hotspot except one are loaded more than 90 percent of their normal rating, and the granular study projections show the load in the hotspot materializing in 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. There are over twenty fleet depots and service centers in the area which are projected to add over 60 MW of load in the next 20 years. The granular study

projections show load growing to 11 MW by 2028, and existing feeders do not have the capacity or configuration capable of supporting this incremental electrification load growth.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. This project avoids underbuilding by installing conduit to support the full electrification scenario and enabling Con Edison to more easily add capacity by pulling future feeders in accordance with load projections from the granular load study. This project mitigates the risk of overbuilding because the assets (a) immediately improve system reliability and resiliency, (b) would immediately support existing customers already electrifying, and (c) create capacity for other non-transportation or building electrification loads.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. The proposal demonstrates that this is a dense area of expected electrification, and that pursuing upgrades would ensure the ability to support the thousands of vehicles in the area expected to electrify in the coming years. The project is required to serve future expected load in the timeframe proposed.

Hunts Point Electrification Hotspot

Con Edison proposed this project to enable the electrification at the Hunts Point electrification hotspot which is home to transportation fleets, delivery fleets, depots, and the Hunts Point Food Distribution Center (FDC), which is the largest of its kind in the world.[3] Con Edison highlighted a few examples of electrification in the area, such as New York City seeking to electrify the FDC and build a first of its kind freight-focused EV charging facility and a private charging hub, with 72 DCFC and 96 L2 plugs under development. Additionally, Con Edison's pre-engagement and advisory services identified customers interest in 14 projects to install charging for fleet electrification in the Hunts Point hotspot. The EV load study projects the Hunts Point hotspot area to have a combined electrification load of 25 MW in 2030, and over 80 MW by 2043 from transportation electrification.

Con Edison proposed varying construction timelines for this project in its current rate case proceeding, which initially caused concern on the urgency of this project.[4] However, as discussed above, Con Edison has identified a number of electrification projects, either under development or planned, that results in need for the proposed project. Additionally, Con Edison has not identified any projects in their ongoing rate case that could mitigate the need for this electrification hotspot project. Based on this, the Commission authorizes this proposal for approval because it meets the overall urgency criteria and would address operational uncertainty and charging availability concerns in the Hunts Point hotspot.

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[3] Con Edison Filing, pp. 37-49.

[4] Case 25-E-0072, Con Edison – Rate Proceeding, Consolidated Edison Company of New York, Inc., Exhibits EIOP 1-14 (filed January 31, 2025), Exhibit__(EIOP-7), pp. 224-267.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would enable various types of electrification, including the FDC and several EV charging facilities.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. Con Edison has not identified any projects in their ongoing rate case that could mitigate the need for this project which seeks to address the forecasted electrification load of the hotspot.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The proposal features a projection that Hunts Point will have a combined electrification load of 25 MW in 2030, and over 80MW by 2043 from transportation electrification. This would address the electrification plans Con Edison has identified, such as New York City's plans to electrify the FDC, the installation of a freight-focused EV charging facility, the development of 72 DCFC and 96 L2 plugs, and 14 customer projects to install charging for fleet electrification.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?

- Yes. This proposal avoids underbuilding by installing conduit to support all six feeders up front, while only installing and energizing three feeders by 2027, with the remaining three installed and energized in accordance with the electrification load. Con Edison mitigates the risk of overbuilding as these feeders provide immediate system reliability and resiliency improvements, support existing customers already electrifying, and create capacity for other non-electrification loads. Additionally, Con Edison's granular EV load forecast does not include trucks serving Hunts Point FDC which are not domiciled in the area and not registered in the State

- Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
  - Yes. The proposal demonstrates that this hotspot is a dense area of expected electrification, and that pursuing upgrades would ensure Con Edison's ability to support the electrification expected in the coming years. The project is required to serve future expected load in the timeframe proposed.

Parkchester No. 1 5th Transformer 9S and Supply Feeder 38X05

Con Edison proposed the Parkchester No. 1 5th Transformer 9S and Supply Feeder 38X05 project to increase the capacity of the Parkchester No. 1 area substation by 73 MW and

support increased load.[5] The proposal suggests that Con Edison needs the funding to supply growing demand, including electrification in the Southeast Bronx network, with the station surpassing its capability in 2030. Because this station would supply electricity to school and utility MHDVs, electrifying personal and commercial fleet vehicles necessary for policy compliance, and specific customer electrification plans, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The upgrade would add the capacity needed to support TE and BE and support charging of light, medium, and heavy-duty vehicles.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The station is forecasted to surpass its capability in 2030. According to Con Edison, engineering and long lead equipment procurement would begin in 2025 for this project, and site preparation for construction is expected to begin in 2027 and to be completed in 2030.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The rapid load growth in the network over the next several years is primarily driven by electrification, and associated economic activity in the area is expected to continue. It includes almost 1,000 additional school buses and utility trucks,

[5] Con Edison Filing, pp. 73-80.

thousands of other personal and commercial fleet vehicles in the area that must electrify to meet policy mandates, and several specific customer electrification plans.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. Con Edison states in its Urgent Projects filing that this project avoids underbuilding by planning in accordance with load projections from the granular load study that ramp up to support the full electrification scenario. Three mitigating factors that counteract the risk of overbuilding are: (1) the assets immediately improve system reliability, (2) the assets can create capacity for other non-transportation or building electrification loads, and (3) if the electrification load does not materialize, the transformer could be removed and used to support new capacity elsewhere on the system.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. If no action is taken to alleviate forecasted capability exceedances at the Parkchester No. 1 substation, there is a high risk of overloading the substation equipment during peak load conditions. Exceeding the rated capacity of the substation could result in load shedding if contingencies occur during peak

loading conditions. This project would provide the necessary load relief for overloaded feeders and equipment, benefiting the reliability of service in the areas served by the Parkchester No. 1 Substation.

Parkchester No. 2 TR13 & B/S 13A & 13B Installation

Con Edison proposed the Parkchester No. 2 TR13 & B/S 13A & 13B Installation project to increase the capacity of the Parkchester No. 2 area substation by 81 MW and directly support increased load. [6] The proposal suggests that Con Edison needs the funding to supply growing demand, which includes electrification in the Northeast Bronx network, such as the Zerega Avenue hotspot. The station is expected to surpass its capability by 6 MW in 2027 and 32 MW in 2028. While the initial filing demonstrates need using Con Edison's new probabilistic planning criteria, Con Edison later indicated that when the granular EV forecast is included, there is a need for the project to be completed by 2027.[7] Con Edison states that 70 percent of the incremental substation load will be from electrification. For these reasons, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The upgrade of this substation would supply TE, such as at Zerega Avenue, another approved project.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?

[6] Con Edison Filing, pp. 81-89.

[7] DPS-CE-11.

- Yes. The submitted granular forecast indicates that the project must be completed by 2027.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The rapid load growth in the Southeast Bronx and Northeast Bronx load areas over the next several years is primarily driven by electrification and associated economic activity in the area. This electrification includes thousands of personal and commercial vehicles in the area that must electrify to meet policy mandates, as well as several specific customer electrification plans, making Con Edison confident that this Proactive Planning project is required to serve future expected load. This project would also enable the electrification of the Zerega Avenue hotspot.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. This project avoids underbuilding by planning in accordance with load projections from the granular load study that ramp up to support the full electrification scenario. Three mitigating factors that counteract the risk of overbuilding are: (1) the assets immediately improve system reliability, (2) the assets can create capacity for other non-transportation or building electrification loads, and (3) if the electrification load does not materialize, the

transformer could be removed and used to support new capacity elsewhere on the system.

- Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
  - Yes. Overloads on the area substation transformers supplying Parkchester No. 1 & 2 Substations are predicted to occur. In the event the transmission feeders or area substation overload, load shedding may be required during peak conditions which would cause thousands of customers to encounter service outages. Without pursuing the project, Con Edison's networks would encounter the potential inability to maintain reliable system power flow controls, system reliability concerns and/or possible customer outages for an extended period during peak load conditions.

Mott Haven 13kv – Install 5th Transformer & 138kV Supply Feeder 38X3

Con Edison proposed the Mott Haven 13kV – Install 5th Transformer & 138kV Supply Feeder 38X3 project to increase the capacity of the Mott Haven Distribution Area Substation by 83 MW in 2029 to mitigate risks associated with the forecasted increased load for the Central Bronx load area.[8] The proposal suggests that Con Edison needs the funding to supply growing demand, including electrification in the Central Bronx load area, which includes the Hunts Point hotspot. While the initial filing demonstrates need using Con Edison's new probabilistic planning

[8] Con Edison Filing, pp. 90-98.

criteria, additional information indicated that when the granular EV forecast is included to the deterministic network-level load forecast, there is a need for the project to be completed by 2029.[9] Con Edison states that 62 percent of the incremental substation load will be from electrification. The Mott Haven area also demonstrates a significant number of commercial vehicles and school buses that will require charging and anticipates transportation-based electricity demand. For these reasons, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The upgrade would supply growing demand from the anticipated transportation electricity demand from EVs and ESBs in the Central Bronx load area, which includes the Hunts Point hotspot. Transportation and building electrification account for 62 percent of the total incremental load needed through 2029 in the Central Bronx load area.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The submitted granular forecast, layered with Con Edison's deterministic network-level load forecast, indicates that the project must be completed by 2029 to resolve the capability constraint at the Mott Haven 13kV substation.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?

[9] DPS-CE-10.

- Yes. This upgrade is necessary to ensure the Mott Haven 13kV substation has the capability to supply the forecasted electrification load of 25 MW in 2030, and over 80 MW by 2043, in the Hunts Point hotspot. This would allow for the energization of the electrification plans identified under the Hunts Point hotspot project.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. This upgrade avoids the risk of overbuilding or underbuilding by planning in accordance with Con Edison's load projections from the granular load study. Additionally, the assets in this upgrade immediately improve system reliability, provide capacity for other non-electrification loads, and the substation transformer can be removed and used elsewhere in the system to support new capacity.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. If this project is not pursued, Con Edison has identified a risk of overloading the substation equipment during peak load conditions which could result in load shedding if contingencies occur. Additionally, without this upgrade, there is the risk of delays in providing service to customers, impacting customer plans and delaying transportation and building electrification. The risk of being too early is

minimal due to the accelerating project plans already identified in the area and high confidence in the load materializing.

Con Edison Urgent Upgrade Projects – Proposals that Do Not Fit Urgency Criteria

Steinway (LaGuardia) (LGA) Electrification Hotspot

Con Edison proposed the LGA Electrification Hotspot project to enable electrification at the LGA hotspot, which targets three individual load pockets: Astoria Generation Complex, Ditmars Steinway Industrial Area, and LaGuardia Airport.[10]

Con Edison provided the feeder ratings for the 16 feeders that would be used to feed the LGA Electrification Hotspot;[11] three of 16 feeders are above 70 percent of their normal rating, and one feeder is above 80 percent, indicating that the feeders have more room for growth. For this reason, the Commission does not authorize this proposal. However, the Commission finds that the project proposal includes necessary components that should be addressed in the near future.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. The load pockets (Astoria Generation Complex, Ditmars Steinway Industrial Area, and LaGuardia Airport) addressed by the Steinway LGA Electrification Project would not be above capacity due to electrification load prior to the initial

[10] Con Edison Filing, pp. 50-61.

[11] DPS-CE-4.

study process under the pending Proactive Planning Framework

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. There are a high number of depots and heavy vehicle traffic that are expected to electrify. There are over 1,300 Con Edison utility vehicles that Con Edison has committed to electrifying; there is also MTA's LaGuardia Depot, totaling over 230 buses. More load growth is expected from taxi and rideshare vehicles that must be zero-emission by 2030. These projects in the area are projected to add over 82 MW of load in the next 20 years. The granular study projections show load growing to 15 MW by 2028, however existing feeders are not expected to exceed their normal ratings by this time. Out of the 16 feeders that are feeding the hotspot only 3 are above 70 percent and one feeder is above 80 percent of its normal rating.

East New York Electrification Hotspot

Con Edison proposed the East New York Electrification Hotspot project to support the projected acceleration in electricity demand due to TE at one of the most transit-rich Industrial Business Zones (IBZs) in New York City.[12] There are several projects within the rate filing that provide load relief to the networks supplying the East New York hotspot, which are Con Edison's Crown Heights, Richmond Hill, and Ridgewood networks. Specifically, Con Edison's proposal indicates that current feeder capability within this area is 771 MW for both

[12] Con Edison Filing, pp. 62-72.

Brownsville No. 1 and No. 2 substation combined. Because of this feeder capability, Con Edison estimates that the forecasted load will not surpass capability until 2034. For these reasons, the Commission does not authorize this project as an urgent upgrade. However, the Commission finds that the project proposal includes components that should be addressed in the near future through a rate case.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. There are six fleets of school buses that total over 1,300 school buses, the MTA's East NY Depot of over 230 buses, and additional EV charger projects that is expected to add 23 MW of load in the next 20 years. The granular study projections show load growing to 8 MW by 2030. While Con Edison expects most of the feeders to exceed 90 percent of their normal ratings by 2030, feeder capability in the area is not expected to surpass load serving capability, due to transportation electrification, until 2034. There are many load relief projects in the Brownsville Area, where the East NY Hotspot is located, that will reduce the load in the area during this timeframe as well. The extended timeframe before surpassing existing capacity and the existence of load relief programs increases the uncertainty of the project's urgency, magnitude, and timing.

New Business Capital Urgent Proactive Funding Program

Con Edison proposed the New Business Capital Urgent Proactive Funding Program to accommodate the impact of increased BE on its New Business costs in 2025 and to avoid reallocation of

resources from other important planned programs, such as reliability initiatives.[13] As a business-as-usual *program*, this request does not match the intent of this proceeding, as Con Edison should be properly forecasting their program budgets in a rate case proceeding. While the Commission understands the need to properly fund this work and appreciates the effort and thought in program design, the Commission does not authorize this proposal and encourages Con Edison to revisit the concept in a rate case.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. This proposal is a program for the on-going support of increased costs of electrification for New Business work from Con Edison customers and does not pertain to the urgent need to begin construction by a particular timeframe.

Proactive Planning Transformer Program

Con Edison proposed he Proactive Planning Transformer Program to proactively upsize transformers and procure new transformers to support increasing new business demand.[14] In its filing, Con Edison requested additional funding that it indicates would be necessary to support the rapidly increasing electrification needs and additional and larger transformers which are strongly connected to BE. As a business-as-usual *program*, this request does not match the intent of this proceeding, as Con Edison should be properly forecasting their program budgets and infrastructure requirements in a rate case

[13] Con Edison Filing, pp. 99-107.

[14] Con Edison Filing, pp. 108-114.

proceeding. While the Commission supports the concept, the Commission does not authorize this proposal, and Con Edison is encouraged to pursue the program through other means.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. This proposal requests funding for the on-going program for the acquisition of transformers and does not pertain to the urgent need to begin construction by a particular timeframe.

National Grid Urgent Upgrade Projects – Authorized Proposals

C094585/C094584/C094583 Mobile Battery Energy Storage Project

National Grid proposed the C094585/C094584/C094583 Mobile Battery Energy Storage project to develop three locations of mobile battery energy storage systems to alleviate immediate constraints related to vehicle electrification and charging demands.[15] The proposal indicates that this project, utilizing grid-enhancing technology, would provide strong bridge-to-wires alternatives supporting TE load growth and serve as a long-term resilience option that would provide interim solutions. Moreover, the project would alleviate immediate constraints and provide application flexibility before a long-term substation solution is developed. For these reasons, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?

[15] National Grid Filing, Project Data Sheets: Transportation Electrification – Mobile Energy Battery Storage, pp. 132-138.

    - Yes. The project would provide bridge-to-wires alternatives to support TE load growth and long-term resiliency.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
    - Yes. The project would provide an interim solution to alleviate immediate constraints while providing the necessary flexibility during the development of a long-term substation solution.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
    - Yes. The existing feeders do not have the capacity or configuration capable of supporting the incremental electrification load growth at Thruway plaza locations at Angola, Chittenango, and Guilderland areas. National Grid expressed an initial need date of 2025, signifying that this is an immediate need.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
    - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
        - Yes. The upgrade is required to enable transportation electrification and accounts for total near-term incremental load needed to be served by the batteries.
    - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?

- Yes. The proposal demonstrates that this is a dense area of expected transportation electrification, and that pursuing upgrades would ensure the ability to support the thousands of vehicles in the area expected to electrify in the coming years. The project is required to serve near-term load in the timeframe proposed.

C089710 Angola 4.8kV to 13.2kV Reconductoring Project

National Grid proposed the C089710 Angola 4.8kV to 13.2kV Reconductoring project to develop distribution reconductoring to serve immediate capacity forecasted for EV charging at Angola Travel Plaza.[16] The proposal indicates that this project is highly associated with the approved Mobile Battery Energy Storage project and would provide distribution reconductoring for 2.5 MW to support mobile batteries. For this reason, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would serve immediate capacity at a travel plaza, enabling TE initiatives. Additionally, the project is associated with the Mobile Battery Energy Storage project, which would also enable TE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project is needed to serve immediate capacity forecasted.

[16] National Grid Filing, Project Data Sheets: Transportation Electrification – Off-Thruway, I-81, and I-87 Capacity - Projects, pp. 140-144.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project is expected to enable approximately 2.5 MW of TE capacity in the area. The existing feeders do not have the capacity or configuration capable of supporting this incremental electrification load and immediate load needed as early as 2025.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The upgrade is required to enable transportation electrification and accounts for total incremental load needed to be served by the new feeders as well as other loads, such as distributed generation. The project would also support other State goals and regulations by providing capacity for customers to connect to the grid.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. The proposal demonstrates that this is a dense area of expected transportation electrification, and that pursuing upgrades would ensure the ability to support the thousands of vehicles in the area expected to electrify in the coming years. The project is required to serve both near-term and future expected load in the timeframe proposed.

C097300 Wilton 3rd Breaker Installation/C097301 Sub T Double Circuit/C097302 13.2 kV Double Circuit Project

National Grid proposed the C097300 Wilton 3rd Breaker Installation/C097301 Sub T Double Circuit/C097302 13.2 kV double circuit project to serve the Wilton EV load, which is projected to be higher than the available capacity in the area by 2030.[17] The proposal indicates that the EV load forecast in this area is indeed driving capacity constraints before 2030. The initial electrification need above existing capability is 3.7 MVA by 2029 and 34.4 MVA by 2040.[18] The project would be highly supportive of TE initiatives and leverageable for the ESB mandate. As National Grid demonstrates sufficient need and meets urgency criteria, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would serve EV load and enable TE initiatives, including the ESB mandate.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project would address the urgent need to serve the load that is estimated to be higher than available capacity by 2030 by providing 8.3 MVA of incremental capacity. The electrification need is expected to be 3.7 MVA above existing capability by 2029 and 34.4 MVA by 2040.

[17] National Grid Filing, Project Data Sheets: Transportation Electrification – Off-Thruway, I-81, and I-87 Capacity Projects, pp. 145-150.

[18] DSP-NMPC-010, Attachment 1.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The electrification of vehicle fleets, truck stops, and school buses in the area are projected to add over 3.7 MVA of load above the existing system capability by 2029. The existing infrastructure does not have the capacity or configuration capable of supporting this incremental electrification load growth.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The upgrade is required to enable transportation electrification and accounts for total incremental load needed to be served by the new infrastructure.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. The proposal demonstrates that this is a dense area of expected electrification, and that pursuing upgrades would ensure the ability to support the thousands of vehicles in the area expected to electrify in the coming years. The project is required to serve future expected load in the timeframe proposed.

C097372 I-81 EV Charging Cortland Rest Stop Project

National Grid proposed the C097372 I-81 EV Charging Cortland Rest Stop project to develop a direct tap to a 34.5kv sub-transmission line to address forecasted granular capacity to serve anticipated EV load at an I-81 rest stop.[19] National Grid also provided that the Cortland project would contribute to TE initiatives, particularly the MHD EV sector. The electrification need above existing capability is 0.2 MVA for 2026 and 9.3 MVA by 2040.[20] For this reason, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would enable TE initiatives, specifically the electrification of MHD EVs.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project would address the electrification need, which is 0.2 MVA above the existing capability by 2026 and 9.3 MVA by 2040.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The I-81 rest stop is projected to experience TE load above the existing system capability of 0.2 MVA by 2026 and 9.3 MVA by 2040. The existing system does not have the capacity or configuration capable of

[19] National Grid Filing, Project Data Sheets: Transportation Electrification – Off-Thruway, I-81, and I-87 Capacity Projects, pp. 151-153.

[20] DPS-NMPC-010, Attachment 1.

supporting this incremental transportation electrification load growth.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The upgrade is required to enable transportation electrification and accounts for total incremental load needed to be served by the new infrastructure.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. The proposal demonstrates that this is a dense area of expected transportation electrification, and that pursuing upgrades would ensure the ability to support the thousands of vehicles in the area expected to electrify in the coming years. The project is required to serve future expected load in the timeframe proposed.

C096326 EV School [Bus] Charger Project

National Grid proposed the C096326 EV School [Bus] Charger project to provide the additional capacity needed due to the electrification of the local school bus fleet.[21] The proposal indicates that the C096326 project is needed to support the school bus fleet and the district's active adherence of the ESB mandate. Because the school is actively procuring the buses, the

[21] National Grid Filing, Project Data Sheets: Transportation Electrification – School Bus and Customer-Driven Projects, pp. 172-174.

capacity need is identified. Moreover, the project was proposed at a low cost. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would provide capacity needed due to the electrification of the local school bus fleet, thus enabling TE, specifically the ESB mandate.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The school district is actively procuring the buses, so the need for additional capacity will emerge as they continue to acquire the vehicles.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would support capacity concerns as a result of the electrification of the school bus fleet in this location on the system. The existing system does not have the capacity capable of supporting this incremental electrification load growth. The school district is already procuring the school buses, so the project timing is appropriate.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The upgrade is required to enable transportation electrification and accounts for total incremental load needed to be served by the

upgrade. The project would also support State goals and mandates, such as the ESB mandate, by providing capacity for the school district.

- Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
  - Yes. The proposal demonstrates that this is an area of expected electrification and that pursuing upgrades would ensure the ability to support the electric school buses that the school district is in the process of procuring. The project is required to serve future expected load in the timeframe proposed.

C093619 – Colosse 2nd Bank for EV Charging Project

National Grid proposed the C093619 – Colosse 2nd Bank for EV Charging project to meet the load request of 700 kW of vehicle charging being installed off I-81.[22] The initial electrification need above existing capability is 0.7 MVA for 2025.[23] The proposal indicates that the Colosse project is necessary to address existing capacity constraints and EV charging demand, including the district's active efforts in adherence to the ESB mandate. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?

[22] National Grid Filing, Project Data Sheets: Transportation Electrification – School Bus and Customer-Driven Projects, pp. 175-177.

[23] DPS-NMPC-010, Attachment 1.

    - Yes. The project would address existing capacity constraints and EV charging demand, thus enabling TE initiatives, including adherence to the ESB mandate.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
    - Yes. The initial electrification need above existing capability is 0.7 MVA for 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
    - Yes. The electric vehicle charging location off I-81 is projected to experience TE load above the existing system capability of 0.7 MVA for 2025. The existing system does not have the capacity or configuration capable of supporting this incremental transportation electrification load growth.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
    - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
        - Yes. The upgrade is required to enable transportation electrification and accounts for total incremental load needed to be served by the new infrastructure. The upgrades would also provide capacity for additional future loads.
    - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
        - Yes. The proposal demonstrates that this is a dense area of expected transportation

electrification and that pursuing upgrades would ensure the ability to support the thousands of vehicles in the area expected to electrify in the coming years. The project is required to serve future expected load in the timeframe proposed.

C092845 EV-Incremental Project

National Grid proposed the C092845 EV-Incremental project to reconductor ~1,500 feet of a feeder for the nearby school's EV chargers.[24] The C092845 EV-Incremental project is in service and that the reconductoring is necessary to serve EV chargers for the district's active efforts in adherence to the ESB mandate. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would include reconductoring necessary to serve EV chargers, thus supporting TE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - N/A. The project is already in service.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project is already in service.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?

[24] National Grid Filing, Project Data Sheets: Transportation Electrification – School Bus and Customer-Driven Projects, pp.193-194.

- Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
  - Yes. The project was sized to account for the 24 electric buses procured by the school district and their associated chargers. The project would also accommodate additional future loads in the area.
- Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
  - N/A. The project is already in service. Without performing the upgrades, the customer would not have been able to service their load request.

C092948 – Electric Vehicle Upgrades 81458 Project

National Grid proposed the C092948 – Electric Vehicle Upgrades 81458 project to address the need for additional capacity and voltage regulation from the electrification of the local school bus fleet.[25] The proposal indicates that the C092948 project is necessary to serve EV chargers for the district's active efforts in adherence to the ESB mandate. The school has IIJA funding, and this project would add a 3-333 KVA Voltage Regulator. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would address the need for additional capacity and voltage regulation from school bus TE.

[25] National Grid Filing, Project Data Sheets: Transportation Electrification – School Bus and Customer-Driven Projects, pp. 187-189.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The school district was awarded IIJA funding, so the need for additional capacity will emerge as they continue to acquire the vehicles.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would support capacity concerns as a result of the electrification of the school bus fleet in this location on the system. The existing system does not have the capacity capable of supporting this incremental electrification load growth. The school district was awarded IIJA funding, so the project has a high level of certainty.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the electric buses to be procured by the school district and their associated chargers.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without performing the upgrades, the school district would not be able to service their load request.

C092949 – Electric Vehicle Upgrades 89553 Project

National Grid proposed the C092949 – Electric Vehicle Upgrades 89553 project to address the need for additional capacity and voltage regulation from the electrification of the local school bus fleet.[26] The proposal indicates that the C092949 project is necessary to serve EV chargers for the district's active efforts in adherence to the ESB mandate. The school has IIJA funding, and this project would add a 3-333 KVA Voltage Regulator. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would address the need for additional capacity and voltage regulation from school bus TE.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The school district was awarded IIJA funding, so the need for additional capacity will emerge as they continue to acquire the vehicles.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would support capacity concerns as a result of the electrification of the school bus fleet in this location on the system. The existing system does not have the capacity capable of supporting this incremental electrification load growth. The school

[26] National Grid Filing, Project Data Sheets: Transportation Electrification – School Bus and Customer-Driven Projects, pp. 184-186.

district was awarded IIJA funding, so the project has a high level of certainty.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the electric buses to be procured by the school district and their associated chargers.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without performing the upgrades, the school district would not be able to service their load request.

C092951 – Electric Vehicle Upgrades 86942 Project

National Grid proposed the C092951 – Electric Vehicle Upgrades 86942 project to address the need for additional capacity and voltage regulation from the electrification of the local school bus fleet.[27] The proposal indicates that the C092951 project is necessary to serve EV chargers for the district's active efforts in adherence to the ESB mandate. The school has IIJA funding, and this project would add a 3-333 KVA Voltage Regulator. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?

[27] National Grid Filing, Project Data Sheets: Transportation Electrification – School Bus and Customer-Driven Projects, pp. 181-183.

    - Yes. The project would address the need for additional capacity and voltage regulation from school bus TE.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
    - Yes. The school district was awarded IIJA funding, so the need for additional capacity will emerge as they continue to acquire the vehicles.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
    - Yes. The project would support capacity concerns as a result of the electrification of the school bus fleet in this location on the system. The existing system does not have the capacity capable of supporting this incremental electrification load growth. The school district was awarded IIJA funding, so the project has a high level of certainty.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
    - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
        - Yes. The project was sized to account for the electric buses to be procured by the school district and their associated chargers.
    - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
        - Yes. Without performing the upgrades, the school district would not be able to service their load request.

C015754 Project

The C015754 project was proposed by National Grid because the bus depot is electrifying its fleet and has requested a 2.2MVA load addition.[28] The proposal indicates that the project is driven by bus electrification and is necessary for the depot's active efforts in adherence to the ESB mandate. For this reason, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would include a 2.2MVA load addition driven by bus electrification and thus would enable TE initiatives, particularly the ESB mandate.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The bus depot is electrifying its fleet and has requested a 2.2MVA load addition for 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would support capacity concerns as a result of the electrification of the bus fleet in this location on the system. The existing system does not have the capacity capable of supporting this incremental electrification load growth. The bus depot is electrifying its fleet and has requested a 2.2MVA load addition for 2025.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?

[28] National Grid Filing, Project Data Sheets: Transportation Electrification – School Bus and Customer-Driven Projects, pp. 190-192.

- Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
  - Yes. The project was sized to account for the electric buses to be procured by the depot and their associated chargers.
- Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
  - Yes. Without performing the upgrades, the bus depot would not be able to service their load request.

C092952 – Electric Vehicle Upgrades 93662 Project

National Grid proposed the C092952 – Electric Vehicle Upgrades 93662 project to address the need for additional capacity and voltage regulation from the electrification of the local school bus fleet.[29] The proposal indicates that the C092952 project is necessary to serve EV chargers for the district's active efforts in adherence to the ESB mandate. The school has IIJA funding, and this project would add a 3-333 KVA Voltage Regulator. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would address capacity and voltage regulated from the electrification of school buses, thus enabling TE and supporting the ESB mandate.

[29] National Grid Filing, Project Data Sheets: Transportation Electrification – School Bus and Customer-Driven Projects, pp. 178-180.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The school district was awarded IIJA funding, so the need for additional capacity will emerge as they continue to acquire the vehicles.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would support capacity concerns as a result of the electrification of the school bus fleet in this location on the system. The existing system does not have the capacity capable of supporting this incremental electrification load growth. The school district was awarded IIJA funding, so the project has a high level of certainty.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the electric buses to be procured by the school district and their associated chargers.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without performing the upgrades, the school district would not be able to service their load request.

C095804 Project

National Grid proposed the C095804 project was proposed to supply new customer load to equip three multiple occupancy buildings with electric heating and EV chargers.[30] National Grid also explained that this project's site electrification goals are adequately supportive of grouping TE/BE policy initiatives. The site requires 2.6 MVA of electrification above the existing capability in 2026.[31] National Grid has provided all required information with a high level of confidence of need date. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would supply multiple occupancy buildings utilizing electric heating and EV charging with capacity, thus enabling both BE and TE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The site requires 2.6 MVA of electrification above the existing capability in 2026.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The site requires 2.6 MVA of electrification above the existing capability in 2026 for transportation and heating.

[30] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 230-233.

[31] DPS-NMPC-010, Attachment 1.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the electric vehicle and heating load in the buildings.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without performing the upgrades, the customer would not be able to service their load request.

C094748 – Cables 4K and 5K Project

National Grid proposed the C094748 – Cables 4K and 5K project to reconstruct a pre-existing hospital for a building designed to be 100 percent electric.[32] The proposal indicates that this project's site electrification goals are adequately supportive of TE/BE policy initiatives. National Grid has provided all required information with a high level of confidence of need date. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would enable BE for a hospital to become 100 percent electric.

[32] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 234-237.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The initial electrification need above existing capability is 1.3 MVA for 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The initial electrification need above existing capability is 1.3 MVA for 2025 at this location for building electrification.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the building and heating load.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without performing the upgrades, the customer would not be able to service their load request.

C092982 – Cables 10H and 12H Project

National Grid proposed the C092982 – Cables 10H and 12H project to supply a new customer connecting three multiple occupancy buildings utilizing electric heating and EV charging

with 1.8 MW of capacity.[33] The proposal indicates that the project's site electrification goals are adequately supportive of TE/BE policy initiatives. The building project was completed in 2024, and these upgrades would supply necessary capacity. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would supply multiple occupancy buildings utilizing electric heating and EV charging with capacity, thus enabling both BE and TE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The building project was already completed in 2024, so these upgrades would supply necessary capacity urgently.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The upgrades have already supplied the customer connecting three multiple occupancy buildings utilizing electric heating and EV charging with 1.8 MW of capacity for a need date of 2024.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?

[33] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 238-241.

- Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
  - Yes. The project was sized to account for the building heating load and electric vehicle charging load.
- Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
  - Yes. Without performing the upgrades, the customer would not have been able to service their load request.

C092111 – Cables 14 and 15K Project

National Grid proposed the C092111 – Cables 14 and 15K project to supply a new customer connecting three multiple occupancy buildings utilizing electric heating and EV charging with 2 MW of capacity.[34] The proposal indicates that the project's site electrification goals are adequately supportive of TE/BE policy initiatives. The building project was completed in 2024, and these upgrades would supply necessary capacity. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would supply multiple occupancy buildings utilizing electric heating and EV charging with capacity, thus enabling both BE and TE initiatives.

[34] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 242-245.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The building project was already completed in 2024, so these upgrades would supply necessary capacity urgently.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. Completed in 2024, the upgrade currently supplies the new customer connecting three multiple occupancy buildings utilizing electric heating and EV charging with 2 MW of capacity.
- Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the building heating load and electric vehicle charging load.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without performing the upgrades, the customer would not have been able to service their load request.

C090952 - Cables 4K and 5K Project

National Grid proposed the C090952 - Cables 4K and 5K project was proposed by National Grid to supply a new customer connecting three multiple occupancy buildings utilizing electric

heating and EV charging with new capacity.[35] National Grid also stated that the project's site electrification goals are adequately supportive of TE/BE policy initiatives. The project would serve 1.8 MVA electrification load for 2026 for customer electric heating.[36] Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would supply multiple occupancy buildings utilizing electric heating and EV charging with capacity, thus enabling both BE and TE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project requires 1.8 MVA electrification load for 2026 for customer electric heating and EV charging.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would provide the customer with 1.8 MVA of electrification load for 2026 for customer electric heating and EV charging.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?

[35] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 246-249.

[36] DPS-NMPC-010, Attachment 1.

- Yes. The project was sized to account for the building heating and electric vehicle charging load.

- Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
  - Yes. Without performing the upgrades, the customer would not be able to service their load request.

Station 3012 Rebuild Project

National Grid proposed the Station 3012 Rebuild project was proposed by National Grid to rebuild a retired station to allow for additional capacity and resiliency.[37] The proposal indicates that the project's site electrification goals are adequately supportive of TE/BE policy initiatives, particularly in municipal utility districts and disadvantaged communities. The project would serve 4.1 MVA electrification load by 2025 to add 5 MVA capacity.[38] For these reasons, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would support both TE and BE initiatives by providing additional capacity and resiliency for EVs and housing heating, particularly in MUDs and disadvantaged communities.

[37] National Grid Filing, Project Data Sheets: Building Electrification – Customer-Driven Distribution Projects, pp. 251-254.

[38] DPS-NMPC-010, Attachment 1.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project would serve 4.1 MVA electrification load by 2025 to add 5 MVA capacity.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would serve 4.1 MVA of electrification load for 2026.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the forecasted load in this area of Buffalo.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without performing the upgrades, the customer would not be able to service their load request.

C094790 Service Extension Project

National Grid proposed the C094790 Service Extension project to build a 13.2 KV extension to accommodate a new, all-electric housing and commercial complex.[39] The proposal indicates that the project's site electrification goals are adequately

[39] National Grid Filing, Project Data Sheets: Building Electrification – Customer-Driven Distribution Projects, pp. 255-257.

supportive of TE/BE policy initiatives. The project would serve a 3.7 MVA all-electric load for housing heating electrification. Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would support an all-electric housing and commercial complex by serving a heating electrification load, thus enabling BE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project would serve 3.7 MVA of electrification load by 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would serve 3.7 MVA of load by 2025 for building electrification.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area.?
    - Yes. The project was sized to account for the building electrification load for the housing project as well as for additional forecasted load in the area.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?

- Yes. Without performing the upgrades, the customer would not be able to service their load request.

C093668 Hancock 2 D Line Upgrade Project

National Grid proposed the C093668 Hancock 2 D Line Upgrade project to upgrade the Hancock #2 Electric Service Station 138 for the expansion of additional system capacity near the site location.[40] The proposal indicates that the project's site electrification goals are adequately supportive of TE/BE policy initiatives. The project proposal demonstrates relatively certain increased electrification load for EV charging at the site location.[41] Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would expand system capacity near the site location, thus enabling TE initiatives. The project specifically would address load for EV charging.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project would serve 5 MVA of electrification load and additional system capacity by 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?

[40] National Grid Filing, Project Data Sheets: Building Electrification – Customer-Driven Distribution Projects, pp. 258-260.

[41] DPS-NMPC-003.

- Yes. The project would serve 5 MVA of load by 2025 for building electrification and EV charging, as well as future area load growth.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the electrification and EV load at the site as well as additional load growth in the area.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without performing the upgrades, the customer would not be able to service their load request.

C093669 Sand 2 D Line Upgrade Project

National Grid proposed the C093669 Sand 2 D Line Upgrade project to upgrade the Sand Road #2 Electric Service Station 141 for the expansion of additional system capacity at the site.[42] The proposal indicates that the project's site electrification goals are adequately supportive of TE/BE policy initiatives. This project is connected to the Hancock 2 D Line Upgrade project, and it is also needed for redundant reliability service for the relatively certain increased electrification

[42] National Grid Filing, Project Data Sheets: Building Electrification – Customer-Driven Distribution Projects, pp. 261-263.

load.[43] For these reasons, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would expand system capacity for EV charging, thus enabling TE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project would serve 5 MVA of electrification load and additional system capacity by 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. The project would serve 5 MVA of load by 2025 for electrification and EV charging, as well as future area load growth.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for electrification and EV load as well as additional load growth in the area.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?

[43] DPS-NMPC-003.

- Yes. Without performing the upgrades, the customer would not be able to service their load request.

C046536 Delameter Substation Rebuild Project

National Grid proposed the C046536 Delameter Substation Rebuild project to install a second bank at the Delameter substation to allow for more capacity to meet the growing need from EV charging and heat pumps.[44] The proposal indicates that the project's site electrification goals are adequately supportive of TE/BE policy initiatives. The project would serve a 5.4 MVA electrification load for EVs and heat pump electrification and address asset condition.[45] Therefore, the Commission authorizes this proposal for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The project would allow for more capacity to meet growing need from EV charging and heat pumps, thus supporting both TE and BE.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. The project would serve 5.4 MVA of electrification load by 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?

[44] National Grid Filing, Project Data Sheets: Building Electrification – Forecast-Driven Distribution Projects, pp. 286-289.

[45] DPS-NMPC-010, Attachment 1.

- Yes. The project would serve 5.4 MVA of load by 2025 for building electrification.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. The project was sized to account for the forecasted BE and TE load growth in the area as well as for additional forecasted load.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action?
    - Yes. Without the project, the system would not be able to support short-term BE and TE loading requirements or future forecasted loads. Not completing the project would also prevent local school districts from servicing their electric school bus load requests.

National Grid Urgent Upgrade Projects – Proposals that Do Not Fit Urgency Criteria

C094400 EV RS – Gee Road-Sub Project

National Grid proposed the C094400 EV RS – Gee Road-Sub project as one of its I-90 upgrade projects to support the forecasted EV charging requirement from vehicle traffic at the Thruway's Chittenango Travel Plaza.[46] The proposal indicates that the Gee Road project would have low contribution to BE initiatives and make no contribution to policy initiatives for

[46] National Grid Filing, Project Data Sheets: Transportation Electrification – I-90 System Capacity Upgrades, pp. 100-104.

the electric school bus mandate or disadvantaged communities. Though capacity need is identified, it is not sufficiently large to meet urgency criteria. National Grid states an electrification load of 0.9 MVA by 2028; however, the project capacity is much larger.[47] The proposal fails to demonstrate immediate need, and the requested investment amount is inappropriately large for the load needed. For these reasons, the Commission does not authorize this proposal. A mobile battery project should provide interim solutions as opposed to a new distribution substation.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. The project would contribute minimally to BE initiatives and make no contribution to the ESB mandate.

C094394 EV RS – Moore Road Project

National Grid proposed the C094394 EV RS – Moore Road project as one of its I-90 upgrade projects to support initial and near-term needs from forecasted EV charging load generated by vehicles at the Thruway service area.[48] The proposal indicates that the Moore Road project would have low contribution to BE initiatives and no contribution to policy initiatives for the ESB mandate or disadvantaged communities. Though capacity need is identified, it is not sufficiently large to meet urgency criteria. The initial electrification need above existing capability is only 0.1 MVA for 2027.[49] The proposal fails to demonstrate immediate need, and the requested investment amount

[47] DPS-NMPC-010, Attachment 1.

[48] National Grid Filing, Project Data Sheets: Transportation Electrification – I-90 System Capacity Upgrades, pp. 105-111.

[49] DSP-NMPC-010 Attachment 1 – Public.

is inappropriately large for load needed. For these reasons, the Commission does not authorize this proposal. A mobile battery project should provide interim solutions as opposed to a new distribution substation.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. The project would contribute minimally to BE initiatives and make no contribution to the ESB mandate.

C094393 EV RS – Pattersonville-Sub Project

National Grid proposed the C094393 EV RS – Pattersonville-Sub project as one of its I-90 upgrade projects to create system capacity for EV charging in DACs in the immediate area.[50] Information provided by National Grid indicates that the Pattersonville project would have low contribution to BE initiatives and no contribution to policy initiatives for the ESB mandate or disadvantaged communities. Though capacity need is identified, it is not sufficiently large to meet urgency criteria. The initial electrification need above existing capability is only 0.2 MVA for 2031.[51] The proposal fails to demonstrate immediate need, and the requested investment amount is inappropriately large for the load needed. For these reasons, the Commission does not authorize this proposal. A mobile battery project should provide interim solutions as opposed to a new distribution substation.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?

[50] National Grid Filing, Project Data Sheets: Transportation Electrification – I-90 System Capacity Upgrades, pp. 112-118.

[51] DSP-NMPC-010 Attachment 1.

- No. The project would contribute minimally to BE initiatives and make no contribution to the ESB mandate.

C094390 EV RS – Angola-Sub Project

National Grid proposed the C094390 EV RS – Angola-Sub project as one of its I-90 upgrade projects to serve expected EV charging capacity requirement forecasted at the travel plaza.[52] Information provided by National Grid indicates that the Angola project is expected to have a high contribution to TE initiatives at multiple locations and would accommodate highway charging with fairly high certainty. Initial total load above existing capability is 5.4 MVA for 2025.[53] However, the project proposal demonstrates very high cost-uncertainty and has project components with conceptual cost estimates, meaning that the project submission does not meet the submission criteria of providing rate case quality information.[54] Therefore, the Commission does not authorize this proposal.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. The project has high cost-uncertainty and at times only offers conceptual cost estimates, therefore failing to demonstrate high certainty of need.

C094380 EV RS – Alleghany Road-Sub Project

National Grid proposed the C094380 EV RS – Alleghany Road-Sub project as one of its I-90 upgrade projects to install a

[52] National Grid Filing, Project Data Sheets: Transportation Electrification – I-90 System Capacity Upgrades, pp. 119-124.

[53] DPS-NMPC-010, Attachment 1.

[54] DPS-NMPC-005; DPS-NMPC-005, Attachment 1.

new distribution substation and support additional EV charging in an area with multiple truck stops and passenger fueling areas.[55] Information provided by National Grid indicates that the Alleghany Road project is expected to have a high contribution to TE initiatives at multiple locations, strong support of BE, and would accommodate highway charging with fairly high certainty. The initial electrification need above existing capability is 1.7 MVA for 2026.[56] However, the immediate need of the project proposal is not proven, and the project submission does not meet the submission criteria of providing rate case quality information, due to its low cost estimate grade.[57] Therefore, the Commission does not authorize this proposal.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. National Grid failed to provide precise information that demonstrates the urgency of construction beginning before the completion of the initial study process.

C097423 Teall Ave 7258 Feeder Upgrades Project

National Grid proposed the C097423 Teall Ave 7258 Feeder Upgrades project to upgrade an existing feeder to accommodate EV charging in East Syracuse.[58] The proposal indicates that there is insufficient certainty that the project

[55] National Grid Filing, Project Data Sheets: Transportation Electrification – I-90 System Capacity Upgrades, pp. 125-130.

[56] DPS-NMPC-010, Attachment 1.

[57] DPS-NMPC-005; DPS-NMPC-005, Attachment 1.

[58] National Grid Filing, Project Data Sheets: Transportation Electrification – Off-Thruway, I-81, and I-87 Capacity Projects, pp. 156-159.

would support TE/BE initiatives and that only a minimal electrification load increase of 0.1 MVA is needed by 2030, meaning it does not meet urgency criteria.[59] For this reason, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. There is insufficient certainty that the project would support TE/BE initiatives.

C093762 Val Kin Station Upgrade Project

National Grid proposed the C093762 Val Kin Station Upgrade project as a suite of projects to meet increasing demand for EV charging at Pilot Travel Center and a large warehouse.[60] Information provided by National Grid indicates that there is insufficient certainty that the project would support TE/BE initiatives. Additionally, only a minimal electrification load increase of 1.2 MVA is needed by 2031, meaning it does not meet urgency criteria.[61] For these reasons, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. There is insufficient certainty that the project would support TE/BE initiatives.

C097421 I-81 EV Charging Watertown Rest Stop Project

National Grid proposed the C097421 I-81 EV Charging Watertown Rest Stop project to reconductor the Coffeen 55 feeder

[59] DPS-NMPC-010, Attachment 1.

[60] National Grid Filing, Project Data Sheets: Transportation Electrification – Off-Thruway, I-81, and I-87 Capacity Projects, pp. 160-165.

[61] DPS-NMPC-010, Attachment 1.

to increase distribution capacity to serve anticipated EV load at an I-81 truck stop.[62] The proposal indicates that there is no immediate need for the Watertown project as capacity need is not anticipated until 2031. Further, there is insufficient certainty that it would support TE/BE initiatives.[63] For these reasons, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. Though the project was proposed to serve anticipated EV load at a truck stop, the proposal does not demonstrate adequately that the upgrade would support TE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. Additional capacity at Watertown is not anticipated until 2031.

North Aud Project

National Grid proposed the North Aud project to supply new customer load with an anticipated request of ~4.7 MW for a multibuilding development.[64] Information in the proposal indicates that this project offers site electrification goals that are adequately supportive of TE/BE policy initiatives. However, it lacked funding numbers, indicating that the project

[62] Case 24-E-0364, National Grid Urgent Upgrade Projects (filed November 13, 2024), Project Data Sheets: Transportation Electrification – Off-Thruway, I-81, and I-87 Capacity Projects, pp. 166-170.

[63] DPS-NMPC-010, Attachment 1.

[64] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 197-200.

scope and cost estimate are not well developed and do not meet the urgency criteria.[65] For that reason, the Commission does not authorize this proposal.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. National Grid identified a need date of 2028.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. A lack of funding numbers indicates that the project was not well developed and therefore does not offer a high degree of certainty.

CXXXXXX Project

National Grid proposed the CXXXXXX project to carry out associated distribution and sub-transmission work to connect new service to a multiple occupancy building.[66] Information in the proposal indicates that this project offers site electrification goals that are adequately supportive of TE/BE policy initiatives. However, the proposal lacked funding numbers, indicating that the project scope and cost estimate are not well developed and do not meet the urgency criteria.[67] For that reason, the Commission does not authorize this proposal.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?

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[65] DPS-NMPC-009.

[66] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 201-204.

[67] DPS-NMPC-009.

- No. National Grid identified a need date of 2028.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. A lack of funding numbers indicated that the project was not well developed and therefore does not offer a high degree of certainty.

CXXXXXX Project

National Grid proposed the CXXXXXX project to carry out associated distribution and sub-transmission work to connect new service to a multiple occupancy building.[68] Information in the proposal indicates that this project appears adequately supportive of TE/BE policy initiatives. However, the proposal lacked funding numbers and had an uncertain need date, indicating that the project scope and cost estimate are not well developed and do not meet the urgency criteria.[69] For those reasons, the Commission does not authorize this proposal.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. National Grid identified an uncertain need date of 2028.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?

[68] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 205-207.

[69] DPS-NMPC-009.

- No. A lack of funding numbers indicated that the project was not well developed and therefore does not offer a high degree of certainty.

CXXXXXX Project

National Grid proposed the CXXXXXX project to carry out associated distribution and sub-transmission work to connect new service to a multiple occupancy building.[70] Information in the proposal indicates that this project's site electrification goals that are adequately supportive of TE/BE policy initiatives and that project need and in-service are relatively certain. However, the proposal lacked funding numbers, indicating that the project scope and cost estimate are not well developed and do not meet the urgency criteria.[71] For that reason, the Commission does not authorize this proposal.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. A lack of funding numbers indicated that the project was not well developed and therefore does not offer a high degree of certainty.

CXXXXXX Project

National Grid proposed the CXXXXXX project w to carry out associated distribution and sub-transmission work to connect new service to a multiple occupancy building.[72] Information in

[70] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 208-210.

[71] DPS-NMPC-009.

[72] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 211-214.

the proposal indicates that this project's site electrification goals are adequately supportive of TE/BE policy initiatives. However, the proposal lacked funding numbers and had an uncertain need date, indicating that the project scope and cost estimate are not well developed and do not meet the urgency criteria.[73] For that reason, the Commission does not authorize this proposal.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. National Grid identified an uncertain need date of 2029.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. A lack of funding numbers indicated that the project was not well developed and therefore does not offer a high degree of certainty.

CXXXXXX Project

National Grid proposed the CXXXXXX project to carry out associated distribution and sub-transmission work to connect new service to a multiple occupancy building.[74] Information provided in the proposal indicates that this project's site electrification goals that are adequately supportive of TE/BE policy initiatives. However, the proposal lacked funding numbers and had an uncertain need date, indicating that the project scope and cost estimate are not well developed and do not meet the

[73] DPS-NMPC-009.

[74] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 215-217.

urgency criteria.[75] For that reason, the Commission does not authorize this proposal.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. National Grid is awaiting a customer request and therefore does not have a certain need date.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. A lack of funding numbers indicated that the project was not well developed and therefore does not offer a high degree of certainty.

CXXXXXX Project

National Grid proposed the CXXXXXX project to carry out associated distribution and sub-transmission work to connect new service to a multiple occupancy building.[76] Information provided in the proposal indicates that this project's site electrification goals are adequately supportive of TE/BE policy initiatives. However, the proposal lacked funding numbers and had an uncertain need date, indicating that the project scope and cost estimate are not well developed and do not meet the urgency criteria.[77] For that reason, the Commission does not authorize this proposal.

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[75] DPS-NMPC-009.

[76] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 218-221.

[77] DPS-NMPC-009.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. National Grid identified an uncertain need date of 2028.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. A lack of funding numbers indicated that the project was not well developed and therefore does not offer a high degree of certainty.

Projects C096246 and C096247

National Grid proposed the C096246, C096247 project grouping to carry out associated distribution and sub-transmission work to connect new service to a multiple occupancy building.[78] The utility is still awaiting details of this project, including a customer load request, in order to fully develop a project scope, which increases the uncertainty of this project.[79] Therefore, the Commission does not authorize this proposal.

Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?

A: No, National Grid is awaiting a customer load request and will begin scoping thereafter. As a result, specifics regarding the project scopes have not been determined.

[78] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 226-229.

[79] DPS-NMPC-005, Attachment 1.

C093808 Central Utica Boutique Sub, D-Line Project

National Grid proposed the C093808 Central Utica Boutique Sub, D-Line project to address capacity and asset condition concerns at the Pleasant and Conklin substations.[80] The proposal indicates that this project has questionable support of electrification policy initiatives. The project is an asset condition project with minimal electrification load increase. Therefore, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. This project is an asset condition project with minimal electrification impact that would not be needed to enable TE/BE.

C09XXX Project

National Grid proposed the C09XXX project to support the electrification included in the redevelopment of housing properties.[81] Most of the 11 phases proposed in the project are vague in scope. Moreover, the lack of a funding number indicates that the project scope and its cost estimate are not well-developed.[82] For these reasons, the Commission does not authorize this proposal.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?

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[80] National Grid Filing, Project Data Sheets: Building Electrification – Customer-Driven Distribution Projects, pp. 264-266.

[81] National Grid Filing, Project Data Sheets: Building Electrification – Customer-Driven Distribution Projects, pp. 267-269.

[82] DPS-NMPC-009.

- No. The company identified a need date of 2026, but the initial load request is able to be served by the existing infrastructure.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. A lack of funding numbers indicated that the project was not well developed and therefore does not offer a high degree of certainty.

C080474 Seventh Ave. Transformer Project

National Grid proposed the C080474 Seventh Ave. Transformer project to replace an existing power transformer with a new one to increase available capacity.[83] Information included in the proposal indicates that this project offers questionable support of electrification policy initiatives because the forecasted load needs are uncertain or undefined. The initial electrification need above existing capability is 0.6 MVA for 2025.[84] Therefore, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. The forecasted loads in the proposal are uncertain or undefined, therefore it is not clear that the project would support TE/BE policy initiatives.

[83] National Grid Filing, Project Data Sheets: Building Electrification – Forecast-Driven Distribution Projects, pp. 271-275.

[84] DPS-NMPC-010, Attachment 1.

C083916 Elsmere Station Rebuild Project

National Grid proposed the C083916 Elsmere Station Rebuild project to address asset condition concerns of two substations in the Albany area.[85] Information included in the proposal indicates that this is an asset condition project with minimal projected electrification load; this project does not meet the urgency criteria.[86] Therefore, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. The proposal is for an asset condition project with minimal projected electrification load that does not support TE/BE policy initiatives.

C086902 Cobleskill Substation 4.8 to 13.2kV Conversion Project

National Grid proposed the C086902 Cobleskill Substation 4.8 to 13.2kV Conversion project to convert circuit switcher and breakers to energize the station transformer and increase feeder tie capability.[87] Information included in the proposal indicates that the project is driven by asset condition – the failure of the Cobleskill TB2 – and not electrification. The execution of this project would be a very minimal electrification load of 0.6 MVA and does not meet the urgent

[85] National Grid Filing, Project Data Sheets: Building Electrification – Forecast-Driven Distribution Projects, pp. 276-280.

[86] DPS-NMPC-010, Attachment 1.

[87] National Grid Filing, Project Data Sheets: Building Electrification – Forecast-Driven Distribution Projects, pp. 281-285.

upgrade criteria.[88] Therefore, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. The proposal is for an asset condition project with minimal projected electrification load that does not support TE/BE policy initiatives.

C081799 Pack-Gardenville T-line Reconfiguration Project

National Grid proposed the C081799 Pack-Gardenville T-line Reconfiguration project to reconfigure the lines between Niagara, Packard, Gardenville, and Erie St. to improve the performance of the 115 kV system.[89] Information provided in the proposal indicates that the project's site electrification goals are inadequately supportive of TE/BE policy initiatives. This project would not address electrification at all; rather it is a transmission project intended to address statewide transfers and congestion, meaning it does not meet the urgency criteria. Therefore, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. The proposed project addresses transmission related issues such as transfers and congestion rather than TE/BE policy initiatives.

C088133 State Campus – Menands #15 UG Replacement Project

National Grid proposed the C088133 State Campus - Menands #15 UG Replacement project to replace ¼ mi parallel

[88] DPS-NMPC-010, Attachment 1.

[89] National Grid Filing, Project Data Sheets: Building Electrification – Forecast-Driven Transmission Projects, pp. 291-294.

underground sections of the State Campus.[90] Information included in the proposal indicates that the project's site electrification goals are inadequately supportive of TE/BE policy initiatives. The proposal offers insufficient project certainty, no definitive electrification load projection,[91] and it is not strongly tied to EV transportation. Therefore, the Commission does not authorize this proposal.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - No. The proposal fails to project electrification load definitively and demonstrates no specific ties to TE initiatives.

CXXXXXX Project

National Grid proposed the CXXXXXX project to carry out associated distribution and sub-transmission work to connect new service to a multiple occupancy building.[92] However, National Grid subsequently withdrew this project from consideration.[93] Therefore, the Commission is not analyzing this project.

[90] National Grid Filing, Project Data Sheets: Building Electrification – Forecast-Driven Transmission Projects, pp. 295-297.

[91] DPS-NMPC-010, Attachment 1.

[92] National Grid Filing, Project Data Sheets: Building Electrification – Sub-Transmission Multiple Occupancy Buildings Projects, pp. 222-225.

[93] DPS-NMPC-010.

NYSEG Urgent Upgrade Projects – Authorized Proposals

Kent Falls Project

NYSEG proposed the Kents Falls project to address urgent capacity and electrification constraints within NYSEG's Plattsburgh Division.[94] In particular, this project allows for the expansion of the Schluter Systems manufacturing facility, which would lead to an increase in jobs and serve customers within disadvantaged communities.[95] The proposed substation expansion includes the installation of a new 115/34.5 kV, 50 MVA power transformer with room to expand to a second circuit in the future. The scope includes building a new 34.5 kV distribution circuit with a set of line regulators and switched capacitors to serve this area.[96] The expected capacity gained by this project is 30 MVA, with 5.3 MW applied to electrification.[97] The overall cost of this project is $37.1 million, with an in-service date of March 2029. Therefore, the Commission hereby authorizes this project for development.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. The requested load from this manufacturing facility was initially sized to include 5.3 MW, strongly correlating to BE initiatives.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?

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[94] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, Kents Falls, p.4.

[95] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentation, pp. 11-18.

[96] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, Kents Falls, p.4.

[97] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentation, pp. 11-18.

- Yes. NYSEG estimated the commencement date for this project to be June 2025, which likely falls in advance of the next rate case filing.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. NYSEG provided information in a confidential response.[98]
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area?
    - Yes. NYSEG appropriately sized this project for an overall capacity gain of 30 MVA.[99]
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrade and the benefits and risks of early action?
    - Yes. Approving this project will reduce the overload conditions on existing infrastructure Under contingency situations. In addition, the Hammond Lane and South Junction substation transformers have 13.5 MVA of remaining capacity. The existing Transmission system is expected to be constrained above 4.0 MVA of additional load.[100]

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[98] Case 24-E-0364, DPS-24-012 Att2 CONFIDENTIAL (filed March 18, 2025).

[99] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentation, Kents Falls Substation Upgrades NYSEG Plattsburgh Division, p. 15.

[100] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Kents Falls Substation Upgrades NYSEG Plattsburgh Division, p. 11.

NYSEG Urgent Upgrade Projects – Proposals that Do Not Fit Urgency Criteria

Vincent Corners Project

As stated by NYSEG, the Vincent Corners project was proposed to address urgent capacity and electrification constraints within NYSEG's Binghamton Division.[101] The Vincent Corners project proposal includes a voltage conversion from 4.8 kV to 12.47 kV at Vincent Corners and Glen Aubrey Tap, which involves replacing the existing transformer with a 34.5/12.5 kV, 14 MVA distribution transformer and upgrading substation equipment. This project also proposes splitting the existing Vincent Corners #269 into two circuits.[102] The expected capacity gained by this project is 4 MVA, with 0.8 MW applied to electrification. NYSEG's filing indicates that the overall cost of the project is $25.3 million, with an in-service date of October 2029.[103]

While BE driven, the transformers are still within the operating limits with the additional load. Also, the overall cost, when comparing the queued loads proposed and the tie to electrification, is relatively high and not fully justified. Information provided in the filing indicate that this substation should be able to handle the queued load. For these reasons, the Commission does not authorize this project as an urgent upgrade project.

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[101] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 6.

[102] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, Vincent Corners, p. 6.

[103] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Vincent Corners NYSEG Binghamton Division, pp. 30-33.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. The proposal did not include an adequate demonstration of urgency. As represented in the initial filing, this substation should be able to handle the 0.8 MW of BE queued load without the proposed upgrades.

Ferndale Project

NYSEG proposed the Ferndale project to address urgent capacity and electrification constraints within its Liberty Division.[104] The Ferndale project consists of the installation of a new 115/12.5 kV, 50 MVA power transformer with high and low side breakers, 15 kV GIS enclosure with three 12.5 kV distribution circuits and up to three spare positions, as well as an additional breaker on the existing bank. The expected capacity gained by this project would be 25.2 MVA, with only 3.2 MW applied to electrification.[105] While the transformer rating at the current substation has been shown to exceed its current summer and winter ratings, the ties to TE/BE were not significant enough to meet urgency criteria. Therefore, the Commission does not authorize this project as an urgent upgrade project.

1. Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?

[104] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, pp. 2-3.

[105] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Ferndale Substation Upgrades NYSEG Liberty Division, pp. 6-8.

- No. The expected capacity gained by this project would be 25.2 MVA, with only 3.2 MW applied to electrification.[106] However, NYSEG ultimately failed to identify urgent load justification tied to significant TE/BE in the area serviced for this project.

Whitney Point Project

NYSEG proposed the Whitney Point project to address urgent capacity and electrification constraints within its Binghamton Division.[107] The proposed Whitney Point project scope includes replacing the existing transformer with a new 34.5/12.5 kV, 22.4 MVA transformer, extending the existing three-phase circuit, and converting two 4.8 kV circuits to 12.5 kV circuits to create a circuit tie with Vincent Corners Substation. In addition, the project includes the installation of two sets of 4.8 MVAr capacitors and a SCADA recloser. The expected capacity gained by this project would be 2 MVA, with 0.7 MW applied to electrification.[108] The overall cost of this project is projected to be $37.8 million, with an in-service date of October 2029. However, the proposal does not adequately demonstrate links between concrete TE/BE policy mandate requirements, such as ACT regulations or the NYS ESB mandate, and the proposed project. Therefore, the Commission does not authorize this project.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?

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[106] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Ferndale Substation Upgrades NYSEG Liberty Division, pp. 6-7.

[107] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 7.

[108] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Whitney Point NYSEG Binghamton Division, pp. 37-39.

- No. Expected capacity gained by this project would be 2 MW, with only 0.7 MW applied to electrification; additionally, the proposal does not adequately demonstrate links between concrete TE/BE policy mandate requirements.

Clarence (Wende & Alden) Project

NYSEG proposed the Clarence (Wende & Alden) project to address urgent capacity and electrification constraints within its Lancaster Division.[109] The proposed project scope includes two new 115/12.5 kV, 50 MVA power transformers, a new 20 MVAR 115 kV cap bank, a new 115 kV transmission ring bus configuration that includes four new circuit breakers, and a 15 kV Gas Insulated switchgear serving five new 12.5 kV distribution circuits to be used for partial load transfers.[110] The expected capacity gained by this project is 19 MVA, with 4.9 MW for electrification. The projected in-service date for the project is January 2029. NYSEG identified load requirements for 4.9 MW of new load, with 3.9 MW for electrification, and the overall cost of this project is projected to be $80.4 million.[111]

While capacity is needed to support current forecasted load requirements, NYSEG did not provide sufficient evidence for such. Although there may be a future need for additional capacity in this area, it should be addressed through other more appropriate means, especially considering the high cost within

[109] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 5.

[110] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 5.

[111] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, New Clarence Substation NYSEG Lancaster Division, pp. 23-25.

this proposal. For these reasons, the Commission does not authorize this project as an urgent upgrade project.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. The proposal fails to identify evidence for the load requirements, leading them to lack certainty.

Wright Ave. Project

NYSEG proposed the Wright Ave. project to address urgent capacity and electrification constraints within its Auburn division.[112] The proposed project scope includes rebuilding the Wright Ave. substation to include a 115kV 3-bay breaker and a half, two new 115/34.5 kV, 50 MVA power transformers, two 115/12.5 kV transformers, with new GIS breakers, cap banks, GIS building and control house. The expected capacity gained by this project would be 25.2 MVA, with 3.0 MW applied to electrification.[113] The total estimated project cost is $105.4 million, with an in-Service date of October 2029. While the filing states that 3 MW of load is attributed to multiple commercial buildings with heat pumps, it does not provide evidence of load due to TE. The presence of a school district alone is not sufficient to warrant urgent justification requirements for strong TE ties. Therefore, the Commission does not authorize this proposal as an urgent upgrade project.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?

[112] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 8.

[113] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Wright Avenue NYSEG Auburn Division, pp. 45-47.

- No. Though the project proposal attributes 3 MW of BE load for commercial buildings with heat pumps, NYSEG fails to demonstrate how this project would directly enable TE initiatives, as the presence of a school district alone does not constitute sufficient evidence.

Centerport Project

NYSEG proposed the Centerport project to address urgent capacity and electrification constraints in the Port Byron and Weedsport areas, within its Auburn Division.[114] The proposed project includes the construction of a new substation with two 34.5/12-4.8 kV, 22.4 MVA power transformers and a 16 MVAr 34.5 kV switched capacitor bank to pick up Port Byron and Weedsport substation load, which requires the retirement of these substations and a full conversion of the circuits from these substations from 4.8 kV to 12.5 kV. In addition, the Hamilton Road Substation will be upgraded to 115 kV ring buses with two new 115/34.5 kV, 50 MVA transformers, and a 16 MVAr 115 kV capacitor bank.[115] The expected capacity gained by this project is 19.4 MVA, with 5.1 MW applied to TE/BE electrification. The overall cost of the project is estimated to be $151.8 million, with an in-service date of October 2031.

The high cost and the risk of securing new property and land acquisition for substation expansion create uncertainty about the project benefits and urgency.[116] Moreover, the projected in-service date of October 2031 does not constitute a

[114] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 9.

[115] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Centerport Area Project NYSEG Auburn Division, pp. 53-55.

[116] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 9.

sense of urgency. For these reasons, the Commission does not authorize this proposal as an urgent upgrade project.

- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - No. The proposal fails to have a high degree of certainty with the identified risk of securing new property and land acquisition for substation expansion.

RG&E Urgent Upgrade Projects – Authorized Proposals

Station 124 Project

RG&E proposed the Station 124 project to address urgent capacity and electrification constraints within the Central Division.[117] The proposed project includes the expansion of the existing 115 kV bus to a 3 bay breaker and a half configuration, replace existing transformers with two new 115/12.5 kV, 50 MVA power transformers, and reconfiguring the local network to have all distribution load served from the 115kV source at Station 124. The expected capacity gained by this project would be 47 MVA, with 6.38 MW applied to TE/BE electrification.[118] The overall cost of this project is expected to be $33.2 million, with an in-service date of December 2028. Information provided by RG&E indicates this project would support the connection of new residential buildings and EV school bus charging projects.[119] While not actively supporting a disadvantaged community or

[117] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 12.

[118] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Station 124 Project, pp. 76-78.

[119] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 12.

environmental justice area, this project would advance state electric school bus charging capabilities. Therefore, the Commission authorizes this project.

- Criterion 1: Is the upgrade needed to enable transportation and/or building electrification (TE/BE)?
  - Yes. RG&E indicated that the project would support electric school bus charging stations.
- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - Yes. RG&E estimated the commencement date for this project to be June 2025.
- Criterion 3: Does the upgrade have a high degree of certainty regarding the location, magnitude, and timing of the need?
  - Yes. RG&E has projected a relatively ambitious in-service date for this project of December 2028.
- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the project?
  - Was the project sized to consider the impacts of over- or under-building by considering all load growth and uncertainties in an area.
    - Yes. Although the overall capacity gain of this project is some-what overbuilt at 47 MVA, allocating 10.8 MW, for TE/BE electrification, load requests constituting 6.4 MW of existing TE/BE load provides significant justification considering the relatively low cost of this project.
  - Does the project minimize the risks of delays and detail both the risks of not pursuing upgrades and the benefits and risks of early action.

- Yes. Station 124's 1T and 2T transformers can be overloaded to 118 percent and 123 percent, respectively, of their Long-Term emergency rating under contingency (fault) conditions.[120]

RG&E Urgent Upgrade Projects – Proposals that Do Not Fit Urgency Criteria

Station 255 Project

RG&E proposed the Station 255 project to address N-1 constraints in its Central division.[121] The proposed project to expand the existing Station 255 includes a new 115/12.5 kV, 50 MVA transformer and the installation of a new 115 kV breaker and a half bay. Additionally, this project will install a 12.5 kV bus, which will connect two new 12.5 kV distribution circuits for partial load transfers from Station 419.[122] The expected capacity gained by this project would be 52.5 MVA, with 10.8 MW applied to TE/BE electrification.[123] The overall cost of the Project is expected to be $19.7 million, with an in-service date of June 2028.

While the project is designed to add capability to the RG&E system, the project is expected to address contingency operation on the system as opposed to addressing urgent electrification needs. Also, the project is being supported by

[120] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 12.

[121] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 10.

[122] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 10.

[123] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Station 255 Upgrades, pp. 61-63.

State grant funding, which allows for progress on the project, which may proceed through future pathways not focused exclusively on urgent TE and BE enablement. Therefore, the Commission does not authorize this proposed project.

- Criterion 2: Does construction need to begin before the estimated completion of the initial study process under the pending Proactive Planning Framework?
  - No. The project already received a subsidy that was intended to support RG&E as a bridge between present demand and its next rate case, suggesting that the project is not urgent and has already received consideration outside of the Proactive Planning Framework.

Station 89 Project

RG&E proposed the Station 89 project to address urgent capacity and electrification constraints within the Central Division.[124] The proposed project includes installing two new 115/12.5 kV, 50 MVA transformers, two new 12.5 kV GIS bus sections to accommodate three new 12.5 kV circuits, and a new 115 kV bus-tie breaker will be added. Additionally, the project involves installing three new 12.5 kV positions to absorb the existing 4 kV circuits from 1T and 2T feeders and five circuits will be converted from 4 kV to 12.5 kV. The existing 12 kV yard and 4 kV yard will be decommissioned. The expected capacity gained by this project is 33 MVA, with 2.03 MW applied to

[124] NYSEG and RG&E Filing, Attachment A – Urgent Upgrade Project Whitepapers, p. 11.

electrification.[125] The overall cost of the project is estimated to be $33.4 million, with an in-service date of June 2029.

The proposed project design includes significant expense and construction beyond what is necessary for the urgent electrification need. Further design work is recommended to ensure the project efficiently addresses the need and manages sizing and cost risk, and could be reviewed in future rate proceedings for potential multi-value benefits beyond the proposed urgent electrification need. Therefore the Commission does not authorize this proposal as an urgent upgrade project.

- Criterion 4: Does the design of the upgrade consider the risks and benefits of both sizing and timing of the projects?
  - No. Although RG&E addresses 2.03 MW applied to BE, the present system configuration has the necessary headroom to provide Summer and Winter peak ratings on the existing substation transformers. The project design includes significant expense to expand the system beyond what is necessary for the potential need.

[125] NYSEG and RG&E Filing, Attachment B – Urgent Upgrade Project Needs and Solutions Presentations, Station 89 Upgrades, pp. 69-71.

SUMMARY OF COMMENTS

This Appendix provides a detailed summary of the comments received on the Urgent Upgrade Filings. The comments are summarized by project and topic to enable a review of stakeholder positions on each subject.

Kents Falls

Nam Trans, CITEC Business Solutions, North Country Chamber of Commerce, Northstar Capital LLC, Town of Plattsburg, United Way of the Adirondack Region, Inc, D. Billy Jones, the New York State Assembly, Plattsburg Creative Signs, Clinton Community College, South Junction Enterprises, the Clinton County Government Center; CCIDA; Twinstate Technologies, Greta Barber, Christine Shay, Brad Rovers, and 288 other individuals submitted identical comments regarding NYSEG's Kents Falls project proposal. These parties express support for the project, asserting that it would support economic development, alleviate capacity constraints, and allow for future growth. They also note that the project would provide the capacity necessary to support EV charging along the Thruway and support regional DER penetration.

Ferndale

The JCC of Sullivan County, the Town of Fallsburg, Camp Chamidim, Infinity Hills Estates, Agudath Israel of America, Machne Gila, Abraham Wislicki, Samuel Mandelbaum, Woodfalls Estates LLC, Land Rover LLC, Usher Steinmetz, David Kaufman, the Partnership for Economic Development in Sullivan County (PEDSC), the Enclave at Sackett Lake, Success Realty Group, and Blue Stone Estates submitted identical comments regarding NYSEG's Ferndale project proposal. These parties assert that the project would bolster residential housing and encourage economic development by

supporting future growth and hosting capacity. The parties also note that upgrades to the substation would support interconnection requests for EV chargers, including the NYS Bus Depot, and provide redundancy to nearby substations, reducing outage scope.

Station 255

The Office of Adam J. Bellow and Konar Properties submitted comments regarding RG&E's Station 255 project proposal. These parties express concern that residents of Monroe County are losing opportunities and are unable to expand due to power constraints. For these reasons, the parties offer support for the project proposal at Station 255, emphasizing its ability to support economic development and housing. The parties also acknowledge that the project would provide support of future load capacity and distribution capacity as well as provide redundancy to nearby substations.

Station 89

The Office of Adam J. Bellow submitted comments regarding RG&E's Station 89 project proposal. The party expresses concern that Monroe County has lost opportunities and is at risk of being overlooked for future development due to lack of power capacity. The party therefore offers support of project proposal, emphasizing its ability to support economic development and housing. The party also acknowledges that the project would provide support of future load capacity and distribution capacity as well as provide redundancy to nearby substations.

Station 124

The Office of Adam J. Bellow and the Town of Penfield submitted comments regarding RG&E's Station 124 project proposal.

The Office of Adam J. Bellow draws attention to the fact that Monroe County has lost opportunities and is at risk of being overlooked for future development due to lack of power capacity. The party therefore offers support of project proposal at Station 89, emphasizing its ability to support economic development and housing. The party also acknowledges that the project would provide support of future load capacity and distribution capacity as well as provide redundancy to nearby substations. The Town of Penfield also offers support RG&E's proposal to upgrade Station 124, emphasizing that the project would support economic development and residential housing by strengthening the station's transformer to resolve the urgent capacity constraints while also allowing for future growth and hosting capacity in the area.

Wright Avenue

CenterState CEO submitted comments regarding NYSEG's Wright Avenue project proposal. The party expresses support for the proposal, asserting that it will support residential development projects and support economic development, future growth, and hosting capacity. The party also asserts that this upgrade would allow NYSEG to meet critical interconnection requests for EV chargers, make new EBS depots possible, and provide redundancy at nearby substations.

Centerport

The Town of Brutus submitted comments regarding NYSEG's Centerport project proposal. The party expresses support for the proposal at Centerport. Referencing the need for new housing in Brutus, the party argues that the project would facilitate residential housing and economic development by resolving urgent capacity constraints, support interconnection requests for EV

chargers and EVB depots, and provide redundancy to nearby substations.

1440 Main St.

R.E McNamara submitted comments regarding National Grid's 1440 Main St. project proposal. The party expresses support for the proposal due to the presence of their project at 1440 Main St. that is reliant on National Grid's cost recovery framework. The party emphasizes that this project's preliminary electrification cost estimates are in the millions, which would make it unviable without the proposal's approval.

Steinway (LaGuardia)

bp pulse, First Student, Ford Motor Company, Wildflower Ltd., Gravity Inc., Queens Chamber of Commerce, the Trucking Association of NY, Port Authority of New York and New Jersey (PANYNJ), and Liberty Coca-Cola Beverages submitted comments regarding Con Edison's Steinway (LaGuardia) project proposal and express their support. bp pulse states that the project consistent with the high demand for EV charging near airports. This is seconded by Ford Motor Company and Queens Chamber of Commerce, which emphasize that nearby customers and site owners have been experiencing challenges and delays, and that the Steinway/LaGuardia proposal coincides with future EV clusters.

First Student and Liberty Coca-Cola Beverages also argue that this project proposal is crucial for enabling vehicle electrification at Steinway/LaGuardia, and that appropriately extensive proactive planning and investment in electrical grid upgrades would facilitate the widespread adoption of EVs. Wildflower Inc. and Gravity Inc. offer similar support points, stating that the project would contribute to the development of a robust EV infrastructure that meets current and future needs

through enhanced reliability and resilience and improved accessibility. The Trucking Association of NY also notes that this proposed upgrade would address the fact that there are currently no publicly available charging stations for medium and heavy-duty vehicles in NYC. PANYNJ states that the upgrades around LaGuardia Airport would provide local capacity and help the Authority meet its 2050 emissions goals.

Hunts Point

First Student, Wildflower Ltd., Gravity Inc., the Trucking Association of New York, the Volvo Group North America, Prologis, and Liberty Coca-Cola Beverages submitted comments on Con Edison's Hunts Point project proposal and express their support. First Student states that the project would upgrade the electrical infrastructure in a key hotspot crucial for enabling vehicle electrification. First Student also emphasizes that appropriately extensive proactive planning and investment in electrical grid upgrades are necessary to facilitate the widespread adoption of ESBs and compliance with the NYS electric bus mandate. Wildflower Ltd. states that the Hunts Pont project would contribute to significantly to the development of a robust, forward-looking EV infrastructure that meets both current and future needs through enhanced reliability and resilience, improved accessibility, and support of sustainable growth.

Gravity Inc. argues that the project would address the need for power upgrades and critical charging infrastructure, emphasizing that limited availability of power on local networks is an impediment to installations. The Trucking Association of New York similarly notes that there are zero publicly available charging stations for medium and heavy-duty vehicles in New York City. The party argues that this project would offer the crucial first step of building a charging network to service New York

City's industrial business zones (IBZs), and that the proposed upgrades would provide confidence that the grid capacity required for the necessary charging infrastructure will be ready in a timeframe allowing fleets to begin transition planning. Prologis emphasizes that the project would facilitate deployment of charging infrastructure at key logistics hubs to enable the electrification of fleets, reduce operational uncertainty, and help keep electrification investments on pace without unnecessary delays or disruptions. Liberty Coca-Cola Beverages asserts that the project would provide a crucial foundation for companies to evaluate EV feasibility with greater confidence.

East New York

First Student, Wildflower Ltd., Brooklyn Chamber of Commerce, the Trucking Association of New York, and Liberty Coca-Cola Beverages submitted comments on Con Edison's East New York project proposal and express their support. First Student states that the project would upgrade the electrical infrastructure in in a key hotspot for enabling vehicle electrification. First Student also emphasizes that appropriately extensive proactive planning and investment in electrical grid upgrades are necessary to facilitate the widespread adoption of ESBs and compliance with the NYS electric bus mandate. Wildflower Ltd. states that the project would contribute to significantly to the development of a robust, forward-looking EV infrastructure that meets both current and future needs through enhanced reliability and resilience, improved accessibility, and support of sustainable growth.

Brooklyn Chamber of Commerce emphasizes that upgrading the electric utility grid and providing load capacity will support the quantity and density of electric vehicle charging stations expected in the area. The party also states that proposed upgrade would give businesses confidence that the grid capacity required for charging infrastructure will be ready,

including industrial, school transportation, and logistics-based companies. The Trucking Association of New York similarly notes that there are zero publicly available charging stations for medium and heavy-duty vehicles in New York City. The party argues that this project would offer the crucial first step of building a charging network to service New York City's IBZs, and that the proposed upgrades would provide confidence that the grid capacity required for the necessary charging infrastructure will be ready in a timeframe allowing fleets to begin transition planning. Liberty Coca-Cola Beverages asserts that the project would provide a crucial foundation for companies to evaluate EV feasibility with greater confidence.

Zerega Avenue

First Student, Compliance GVC Ltd., Wildflower Ltd., Polara Energy, the Trucking Association of New York, and Liberty Coca-Cola Beverages submitted comments on Con Edison's Zerega Avenue project proposal and express their support. First Student states that the project would upgrade the electrical infrastructure in a key hotspot crucial for enabling vehicle electrification. First Student also emphasizes that appropriately extensive proactive planning and investment in electrical grid upgrades are necessary to facilitate the widespread adoption of ESBs and compliance with the NYS electric bus mandate. Similarly, Compliance GVC Ltd. emphasizes that this project is necessary to meet the projected increased loads from thousands of electric buses anticipated to be located nearby.

Polara Energy also notes that this project would enable New York City to undergo its electric vehicle transition and provide the capability to install and use significant EV charging capacity to fleet depots. Wildflower Ltd. states that it would contribute to significantly to the development of a robust, forward-looking EV infrastructure that meets both current and

future needs through enhanced reliability and resilience, improved accessibility, and support of sustainable growth. The Trucking Association of New York similarly notes that there are zero publicly available charging stations for medium and heavy-duty vehicles in New York City. The party argues that this project would offer the crucial first step of building a charging network to service New York City's IBZs, and that the proposed upgrades would provide confidence that the grid capacity required for the necessary charging infrastructure will be ready in a timeframe allowing fleets to begin transition planning. Liberty Coca-Cola Beverages emphasizes that the project would provide a crucial foundation for companies to evaluate EV feasibility with greater confidence.

Parkchester

Compliance GVC Ltd. submitted comments regarding Con Edison's Parkchester project proposal and expresses support. The party claims that the project would be necessary to meet the projected increased loads from the thousands of electric buses anticipated to be located near there and that the upgrade would support the vehicle charging needs of growing ESB fleets.

Lancaster Division

The Buffalo Niagara Partnership submitted comment regarding NYSEG's proposal to build a substation in its Lancaster Division and offers support. The party notes that a new substation would support residential housing and economic development as well as future growth and hosting capacity. The party also argues that the substation would meet the load needed to support EV charging near the Thruway and improve grid reliability by providing redundancy to nearby substations.

Liberty Division

David Meisels submitted comments regarding NYSEG's application for State grants and necessary permissions to upgrade the electrical infrastructure in the Liberty Division and offered support, emphasizing a personal delay in receiving an electrical upgrade on his own property.

Thruway I-90

The New York State Thruway Authority, the Alliance for Transport Electrification (ATE), Powering America's Commercial Transportation (PACT), the Trucking Association of New York, and the EDF submitted comments on National Grid's urgent project proposals to upgrade the Thruway portion of I-90 and express their support. The New York State Thruway Authority argues that National Grid's proposals to upgrade the Thruway portion of I-90 at Angola, Allegheny Road, Moore Road, Gee Road, Pattersonville, and Guilderland align with the ZEF Corridor strategy by investing in the Buffalo, Syracuse, Albany, and NYC hubs. The party also emphasizes that these projects would create capacity for charging along the highway, enabling charging deployment and accelerated EV adoption, providing certainty about infrastructure capabilities, and ensuring compliance with NYS law.

ATE finds the Thruway projects to be well-supported by National Grid's filing and of an urgent nature and thus deemed them to be necessary for TE/BE. PACT offers general support for the Thruway projects. The Trucking Association of New York notes that National Grid's urgent upgrade project at Alleghany Road, the Cortland Service Area, the Watertown Service Area, Angola, DeWitt, Chittenango, Pattersonville, and Guilderland Thruway Service Plazas would give confidence that the grid capacity required for the necessary charging infrastructure will be ready in a timeframe allowing fleets to begin transition planning. EDF

asserts that National Grid has appropriately shown why investments are needed to support EV charging along the Thruway.

Off-Thruway, I-87, I-81

ATE, PACT, and EDF submitted comments on National Grid's urgent project proposals to upgrade the Thruway portion of I-90 and express their support. ATE finds the Off-Thruway projects to be well-supported by National Grid's filing and of an urgent nature and thus deemed the projects to be necessary for TE/BE. PACT offers general support for the Off-Thruway projects. EDF asserts that National Grid has appropriately shown why investments are needed to support EV charging along the interstate highways in its territory.

Brooklyn & Queens

The New York State Bus Distributor Association and Tesla submitted comments on Con Edison's urgent project proposals in Brooklyn and Queens. The New York State Bus Distributor Association emphasizes the need for upgrades to the electrical infrastructure in communities that domicile many of all school buses operating for the New York City Department of Education, including Brooklyn. The party also emphasizes the critical need for utility infrastructure to be upgraded at a pace that exceeds the deployment of school buses.

Tesla notes that proactive upgrades of commercial-industrial sites around Brooklyn and Queens will be critical to unlock potential customers' ability to replace their existing diesel Class 8 fleets with EVs.

Bronx

The New York State Bus Distributor Association, Compliance GVC Ltd., and Volvo Group North America submitted

comments on Con Edison's urgent project proposals in Brooklyn and Queens. The New York State Bus Distributor Association emphasizes the need for upgrades to the electrical infrastructure in communities that domicile many of all school buses operating for the New York City Department of Education, including Brooklyn. The party also emphasizes the critical need for utility infrastructure to be upgraded at a pace that exceeds the deployment of school buses.

Compliance GVC Ltd supports the proposed upgrades in the Bronx for their assistance to the DACs located there. Volvo Group North America emphasizes that the proposals in the Bronx would help accelerate the deployment of charging infrastructure and enable the successful adoption of Class 8 battery-electric vehicles.

Proactive Planning Transformer Program

bp pulse, Ford Motor Company, and EDF submitted comments on Con Edison's Proactive Planning Transformer Program proposal and express support. bp pulse argues that the program would enable utility advance procurement of critical equipment in anticipation of future need. Ford Motor Company expresses that the program would help mitigate the challenges and delays faced by customers due to transformer upgrade needs. EDF specifically supports the interim cost recovery for the Proactive Planning Transformer Program, noting that Con Edison has adequately demonstrated that this program is needed to serve TE/BE new business in 2025, and that the projected costs of this program exceed the levels implied in its current base rate plan.

EV Hotspots

First Student, Ford Motor Company, Brooklyn Chamber of Commerce, and Tesla submitted comments on Con Edison's project proposals that would address EV hotspots. First Student

expresses support for all Con Edison's project proposals that would upgrade the electrical infrastructure in key hotspots crucial for enabling vehicle electrification, arguing that appropriately extensive proactive planning and investment in electrical grid upgrades are necessary to facilitate the widespread adoption of ESBs and compliance with the NYS electric bus mandate. Ford Motor Company offers similar support for upgrades in hot spot locations as they would address challenges and delays, particularly in regions corresponding with future EV clusters.

Brooklyn Chamber of Commerce specifically supports the project proposals for primary feeders to support EV charging hotspots, asserting that upgrading the electric utility grid and providing load capacity would support the quantity and density of electric vehicle charging stations expected in the area. The party also states that proposed upgrades would give businesses confidence that the grid capacity required for charging infrastructure will be ready, including industrial, school transportation, and logistics-based companies. Tesla notes that upgrades in locations where EV charging hot spots are expected to emerge are essential to Con Edison’s work to support customer electrification.

National Grid Proposals

EVgo, Phillips Lytle LLC, IONNA, Daimler, and CALSTART submitted general comments on National Grid’s suite of project proposals. EVgo commends the proactive approach for offering certainty regarding infrastructure capabilities and for its ability to assist in upcoming high speed charging deployments. Phillips Lytle LLC emphasizes that National Grid’s projects would enable the electrification of housing projects, highlighting that the approval and cost recovery of the projects would address the

electrical grid needs in New York due to the increase in BE. The party's comments refer to a specific housing development as an example of National Grid's urgent need to address New York's electrical grid demands to ensure that affordable housing demands are met alongside with the State's climate objectives.

IONNA notes that the proposals seek to expand the grid in preparation for EV charging infrastructure and are therefore crucial to support its efficient deployment, which the party claims would support the proliferation of zero-emission vehicles in alignment with New York State's vehicle electrification goals. Daimler supports National Grid's proposals but suggests they may be needed sooner. CALSTART commends National Grid's focus on customer outreach and requests for specific customer feedback to validate their plans.

Con Edison Proposals

Ate, Ai Air Conditioning Group, Highland Electric Fleets, IONNA, Daimler, Volvo Group North America, and CALSTART submitted general comments in support of Con Edison's suite of project proposals. ATE states that the company has responded seriously to the Commission's request for project proposals that will reduce future burdens and allow electrification to proceed without undue or unnecessary hurdles. ATE also agrees with the approval of the larger sized projects, regarding such projects as essential if the company is to continue to accommodate the growing magnitude of electrification in its service area. Ai Air Conditioning Group commends Con Edison's proposals, as they would help mitigate supply chain risks, reduce delays while accommodating new electric load requests, and support the continued electrification of buildings and vehicles, all of which will facilitate the smooth and efficient expansion of electrification efforts across the service territory.

Highland Electric Fleets emphasizes that the projects would grant the ability to install and use significant EV charging capacity, which is essential for fleets transitioning to electric vehicles. The party also notes that increased confidence in local grid capacity and its ability to support charging infrastructure will lead to further investment in financial and other resources that support electrification plans and prevent delays. IONNA notes that the proposals seek to expand the grid in preparation for EV charging infrastructure and are therefore crucial to support its efficient deployment, which the party claims would facilitate the proliferation of zero-emission vehicles in alignment with New York State's vehicle electrification goals. Daimler praises Con Edison for its support of med- and heavy-duty EVs. CALSTART finds the proposals to include many upgrades that are critical to fleet electrification and therefore recommends approval of Con Edison's proposals.

However, NYC submitted comments encouraging the Commission to reject Con Edison's urgent project proposals because the proceeding is running concurrently with a pending Con Edison rate case. Since the company will not see the projects approved before the resolution of the rate case, the City argues that they should not be considered on an expedited basis outside of the rate case process.

NYSEG/RG&E Proposals

Daimler submitted a comment in support of NYSEG and RG&E's suite of proposed projects but acknowledges a lack of familiarity with the service area. Conversely, CALSTART in its comments encourages the Commission to reject NYSEG and RG&E's proposals on the basis that there is insufficient and non-comprehensive analysis available in the provided filing.

All Proposals

Enterprise Mobility, Mountaintop Villas LLC, Gage Zero, and New York State School Boards Association (NYSSBA) submitted comments in support of all the proposals submitted by the Utilities. Enterprise Mobility emphasizes that the Utilities' proposals would construct power infrastructure along major travel corridors and airports and are thereby necessary for the facilitation of the EV charging ecosystem. Mountaintop Villas LLC commends the PSC for the proceeding overall, praising the State for working to upgrade the grid at a pace to meet demand, support the energy transition alongside electrification, and combat the NYS housing crisis. Gage Zero's comment offers broad support of the entire proceeding, noting that strategic grid planning and infrastructure upgrades play an important role in meeting the growing demand for electrification. NYSSBA praises the individual utilities' urgent project proposals for their attempt to facilitate access to the necessary electrical supply to charge ESBs.

Evaluation Criteria

The International Council on Clean Transportation (ICCT), NYSSBA, and Daimler submitted comments on the evaluation criteria used by the Joint Utilities to determine and assess the urgent upgrade projects. ICCT supports the Joint Utilities' evaluation criteria because it would allow utilities to pursue informed, proactive grid investments in a timely manner and mitigate potential electrification delays. Specifically, ICCT supports the Joint Utilities' definition of "Construction-related Activities" that would provide certainty of cost recovery, reducing the risk that otherwise would delay the decision to move with proactive investments. NYSSBA offers general support for the Joint Utilities' long-term proactive planning framework.

Daimler expresses support for the five principles outlined by the Joint Utilities and concurs that the process should start with a load assessment. The party also agrees that new data sources would need to be incorporated into the bottoms-up distribution planning processes. However, Daimler also suggests adjustments to energization timelines, encouraging interstate collaboration and that the PSC show preference to significant and substantive grid additions. The party also encourages increased support of bridging solutions, the use of DERs by customers for their own microgrids, and the publication of hosting capacity maps at investment-grade levels. Overall, Daimler asserts that the proposal is reasonable but lacks clarity and timeline discussions.

MI, NYC, and EDF also submitted comments on the Joint Utilities' proposed Evaluation Criteria, expressing that the assessment process outlined in the filing is not stringent enough. These parties offer several adjustments on the matter of specificity, quantification, and policy compliance.

MI contends that the Joint Utilities' proposed criteria are not stringent enough. They emphasize that the Joint Utilities should recognize that the approval of large capital projects outside of rate proceedings should constitute the exception rather than the norm. The party asserts that the framework should be modified to also specify whether system forecast, granular load study, and customer requests or electrification plans will all be examined when identifying load needs and proposed projects. Similarly, NYC suggests that if all three criteria are examined but only one or two are used to justify the request, the Commission should require the utility to provide an explanation regarding why the other elements were not relied on.

EDF suggests several adjustments to the evaluation criteria, including that the Commission should replace "upgrade projects" with "solutions" to accommodate non-wires approaches. The party also suggests that the Commission should clarify that policy compliance is a necessary characteristic of utilities' baseline planning scenario and encourages the Commission to clarify that policy-compliant forecasting is mandatory. EDF also stated that the Commission should establish uniform means of quantifying other criteria information in future stages of this proceeding, such as reliability metrics.

Cost Recovery – National Grid

2929 Main LLC., R.E McNamara, Phillips Lytle LLC, EDF, and CALSTART submitted comments in support of National Grid's cost recovery proposal as it would allow for development projects supporting New York's housing and electrification goals.

MI submitted comments recommending that the Commission reject each of the Joint Utilities' cost recovery proposals, including National Grid's.

Cost Recovery – Con Edison

EDF submitted a comment supporting that costs for Con Edison's urgent projects would be allocated in line with the company's current tariff and that cost recovery would be proposed through a surcharge or base rates depending on the project's timing. However, MI submitted comments recommending that the Commission reject each of the Joint Utilities' cost recovery proposals, including Con Edison's. NYC also recommends that the Commission does not consider Con Edison's projects separately or consider imposing surcharges for their projects, suggesting that the company addressed the same infrastructure needs in its rate case as it does in its urgent project proposals.

Cost Recovery – NYSEG/RG&E

NamTrans, CITEC, North Country Chamber of Commerce, Northstar Capital LLC, the Town of Plattsburg, United Way of the Adirondack Region, D. Billy Jones, the NYS Assembly, Plattsburg Creative signs, Clinton Community College, South Junction Enterprises, JCC of Sullivan County, the Town of Fallsburg, CCIDA, Clinton County Government Center, CenterState CEO, Twinstate Technologies, Konar Properties, the Town of Brutus, Buffalo Niagara Partnership, Camp Chamidim, Infinity Hills Estates, David Meisels, Agudath Israel of America – Camp Division, Machne Gila, Abraham Wislicki, Samuel Mendelbaum, Woodfalls Estates LLC, Land Rover LLC, Usher Steinmetz, David Kaufman, PEDSC, The Enclave at Lake Sackett, Success Reality Group, Blue Stone Estates, the Town of Pennfield, Greta Barber, Christine Shay, Brad Rovers, and 288 others submitted comments in support of NYSEG and RG&E's request to start cost recovery during construction and at a surcharge.

However, EDF offers parameters that the Commission should follow if it were to approve the interim cost recovery proposed by NYSEG and RG&E. This would include, if approved, a modification of the proposal to allow up to 10 percent Construction Work in Progress (CWIP), and to deny the request for accelerated depreciation. The party asserts that the companies have not sufficiently demonstrated why 100 percent CWIP would be necessary for the proposed projects. The party also notes that it would support an allowance of up to 50 percent of project costs as CWIP in rate base if the Commission choses to approve any of the companies' project proposals.

MI submitted comments recommending that the Commission reject each of the Joint Utilities' cost recovery proposals, including NYSEG's and RG&E's proposal.

Company Name: Con Edison
Case Description: Proactive Planning for Upgraded Electric Grid Infrastructure
Case: 24-E-0364

Response to DPS Interrogatories – Set DPS-CE-04
Date of Response: March 03, 2025
Responding Witness:

Question No. :1
Subject: LGA Electrification Hotspot

In all interrogatories, any requests for workpapers or supporting calculations shall be construed as requesting any Word, Excel, or other computer spreadsheet models in original electronic format with all formulae intact and unlocked.

Provide a table listing all feeders of the Long Island City network and Jackson Heights Network that will feed the LaGuardia (LGA) Electrification hotspot, mentioned in page 51 of the Company's Urgent Projects filing, with their peak summer load and their normal ratings.

Response

The table below provides the peak summer load and normal ratings for the feeders proposed, which will be coming from the Long Island City network, to feed the LaGuardia (LGA) Electrification hotspot.

Table 4: The proposed feeders to feed the LaGuardia (LGA) Electrification hotspot

Feeder Name	Normal Load (amps)	Normal Rating (amps)	% Loaded on Normal
1Q01	78	420	19%
1Q02	140	210	67%
1Q03	181	440	41%
1Q04	164	435	38%
1Q05	283	420	67%
1Q06	242	345	70%
1Q07	169	400	42%
1Q09	285	535	53%

1Q11	298	535	56%
1Q14	217	345	63%
1Q15	115	465	25%
1Q17	108	285	38%
1Q20	388	565	69%
1Q21	331	385	86%
1Q24	66	335	20%
1Q25	195	270	72%

Company Name: Con Edison
Case Description: Proactive Planning for Upgraded Electric Grid Infrastructure
Case: 24-E-0364

Response to DPS Interrogatories – Set DPS-CE-10
Date of Response: March 31, 2025
Responding Witness:

Question No. :1
Subject: Mott Haven 13kV – Install 5th Transformer & 138kV Supply Feeder 38X30

In all interrogatories, any requests for workpapers or supporting calculations shall be construed as requesting any Word, Excel, or other computer spreadsheet models in original electronic format with all formulae intact and unlocked.

On page 13 of the Company's Urgent Projects filing, it states that "to support electrification activities and growth at Hunts Point, such as the proposed redevelopment of the produce market, substation upgrades at Mott Haven are needed by 2029 to meet projected loads."

In response to question two (2) of IR DPS-CE-07, the Company states that "load will exceed Mott Haven area substation capability in 2029."

On page 170 of the Exhibit__(EIOP-7), filed under Case 25-E-0072, the Company states that Mott Haven substation "is forecasted to have its station capability surpassed in 2034 based on the Company's forecast projections" but that the Company's "probabilistic assessment identified this station to have an elevated risk of load drop as early as 2029 as it approaches the substation capacity."

a. Clarify which year Mott Haven substation will exceed its capability.
b. Explain the difference between the Company's statements in this proceeding and in the rate case, Case 25-E-0072.
c. If the Company is using its probabilistic assessment to accelerate the need for this project, provide the probability of a load drop at the Mott Haven station annually, from 2029 through 2034, and include the amount of MWs and number of customers that would lose power in such an event.
d. Explain the specific details of this substation and/or network that drives this risk of a load drop.

Response

a. Using the additional load from the granular EV load projections, as noted in the Company's Urgent Projects filing, the Mott Haven area substation will exceed its capability in 2029. The projected granular EV load projections from the bottom-up study explained in the Company's Urgent Projects filing detail the electrification activities and growth in the area, including the Hunts Point EV charging hotspot. Additionally, the probabilistic assessment showed high risk in the Mott Haven area substation starting in 2029. See summary table below.

The Mott Haven area substation will exceed its capability in 2034 when planning to the Company's Forecast using our foundational deterministic planning criteria. Adding granular EV loads or risk adjusted layers to that planning criteria, leads to a project need year of 2029.

Assessment	**Need year for Mott Haven Area Substation Upgrades**
Deterministic using Granular EV load projections (additional bottom-up loads)	2029
Probabilistic using Company Forecast	2029
Deterministic using Company Forecast	2034

b. See response to 1a.

c. As of 2024, the Mott Haven area substation has an independent peak load of 199 MW serving a total of 67,128 metered customers. The Company Forecast expects loads to increase to 223 MW by 2029 and 252 MW by 2034.

For distribution systems, the Company uses the Network Resiliency Index (NRI) to identify which distribution networks are most at risk and has been able to allocate investments to networks where resources should be applied on a priority basis to improve reliability. Similar to the NRI model, TPRA quantifies risk of service interruption on the transmission and substation level. The unit of loss of load probability (T-NRI: Transmission Network Reliability Index) from the transmission through the area substation level, with all area substations combined, is 1 load drop in 20 years system-wide. This probability unit equals to NRI in load drop frequency. The Mott Haven area substation's risk of load drop based on the Company Forecast from 2028-2034 represented in T-NRI is shown in the table below.

Year	2028	2029	2030	2031	2032	2033	2034
T-NRI	0.8	1.8	1.4	1.4	1.8	1.4	1.5

Even though there is fluctuation in the T-NRI values above due to the nature of Monte Carlo simulation, the risk of load drop in the Mott Haven area substation is elevated starting in 2029 and stays so post 2029.

d. The Mott Haven area substation's risk of load drop is elevated compared to other stations due the combined effects of multiple factors, such as the topology of the station/system, station capacity and projected load. Combinations of outages of transmission, sub-transmission, and substation equipment contribute to the projected load drops. Overlapping outages under forecasted high station load are more likely to trigger thermal violations, which can lead to load drops if mitigation measures are insufficient.

Company Name: Con Edison
Case Description: Proactive Planning for Upgraded Electric Grid Infrastructure
Case: 24-E-0364

Response to DPS Interrogatories – Set DPS-CE-11
Date of Response: March 31, 2025
Responding Witness:

Question No. :1
Subject: Parkchester No. 1 and No. 2 Substations

In all interrogatories, any requests for workpapers or supporting calculations shall be construed as requesting any Word, Excel, or other computer spreadsheet models in original electronic format with all formulae intact and unlocked.

On page 75 of the Company's Urgent Projects filing, the Company states that the "station capability at Parkchester No. 1 will be over 100% utilized in 2028."

On page 84 of the Company's Urgent Projects filing, it the "station capability at Parkchester No. 2 will be over 100% utilized in 2027."

On page 190 of Exhibit__(EIOP-7), filed under Case #25-E-0072, the Company states that "the station capability at Parkchester No. 1 will be over 100% utilized in 2030, but that the "Company has elected to incorporate a transmission probabilistic reliability assessment (TPRA) method of planning," which "shows that both Parkchester No. 1 and No. 2 substations have high risk of dropping load in year 2028 and beyond due to high projected load."

On page 197 of Exhibit__(EIOP-7), filed under Case 25-E-0072, the Company states that "there is a risk that station capability at Parkchester No. 2 might be over 100% utilized in 2031."

a. Clarify which year Parkchester No. 1 and No. 2 substations will exceed their capability.
b. Explain the difference in between the Company's statements in this proceeding and the in the rate case, Case 25-E-0072.
c. If the Company is using its probabilistic assessment to accelerate the need for the Parkchester substation projects, provide the probability of a load drop at both stations annually, from 2029 through 2034, and include the amount of MWs and number of customers that would lose power in such an event.
d. Explain the specific details of each station/network that drives this risk of a load drop.

Response

a. Using the additional load from the granular EV load projections, as noted in the Company's Urgent Projects filing, Parkchester No.1 will exceed its capability in 2028 and Parkchester No.2 will exceed its capability in 2027. The projected granular EV load projections from the bottom-up study explained in the Company's Urgent Projects filing detail the electrification activities and growth in the area, including the Zerega Ave EV charging hotspot. Additionally, the probabilistic assessment showed high risk in Parkchester No.1 & Parkchester No.2 area substation starting in 2028. See summary table below.

The Parkchester No.1 area substation will exceed its capability in 2028 and Parkchester No.2 will exceed its capability in 2032 when planning to the Company's Forecast using our foundational deterministic planning criteria. Adding granular EV loads or risk adjusted layers to that planning criteria, leads to project need years listed below.

Assessment	**Need year for Parkchester No.1 Upgrades**	**Need year for Parkchester No.2 Upgrades**
Deterministic using Granular EV load projections (additional bottom-up loads)	2028	2027
Probabilistic using Company Forecast	2028	2028
Deterministic using Company Forecast	2028	2032[1]

b. See response to 1a.

c. As of 2024, Parkchester No. 1 has an independent peak load of 212 MW serving a total of 87,878 metered customers. The Company Forecast expects loads to increase to 234 MW by 2029 and 274 by 2034.

For distribution systems, the Company uses the Network Resiliency Index (NRI) to identify which distribution networks are most at risk and has been able to allocate investments to networks where resources should be applied on a priority basis to improve reliability. Similar to the NRI model, TPRA quantifies risk of service interruption on the transmission and substation level. The unit of loss of load probability (T-NRI: Transmission Network Reliability Index) from the transmission through the area substation level, with all area substations combined, is 1 load drop in 20 years system-

[1] For Parkchester No.2, the station capability is exceeded by 1 MW in 2031, which the Company deems within acceptable limits of equipment ratings, therefore the station is over utilized 100%, with an excess of 3 MW in 2032. If the forecast comes in higher, the 1 MW overload in 2031 will exceed the acceptable limits of the station capability.

wide. This probability unit equals to NRI in load drop frequency. Parkchester No.1 area substation's risk of load drop based on the Company Forecast from 2028-2034 represented in T-NRI is shown in the table below.

Year	2028	2029	2030	2031	2032	2033	2034
T-NRI	3.7	3.7	4.6	3.8	4.4	6.0	6.3

As of 2024, Parkchester No. 2 has an independent peak load of 112 MW serving a total of 98,249 metered customers. The Company Forecast expects loads to increase to 164 MW by 2029 and 176 MW by 2034.

Parkchester No. 2 area substation's risk of load drop based on the Company Forecast from 2028-2034 represented in T-NRI is shown in the table below.

Year	2028	2029	2030	2031	2032	2033	2034
T-NRI	11.4	10.4	8.8	10.2	10.0	9.9	10.0

Even though there is fluctuation in the data above due to the nature of Monte Carlo simulation, the risk of load drop in the Parkchester area substations is elevated in 2028 and later years.

d. The Parkchester No.1 & Parkchester No. 2 area substation's risk of load drop is elevated compared to other stations due to the combined effects of multiple factors, such as the topology of the station/system, station capacity and projected load. Combinations of outages of transmission, sub-transmission, and substation equipment contribute to the projected load drops. Overlapping outages under forecasted high station load are more likely to trigger thermal violations, which can lead to load drops if mitigation measures are insufficient.

Date of Request: February 27, 2025 Request No. DPS-NMPC-003
Due Date: March 10, 2025 NG Request No. n/a

Niagara Mohawk Power Corporation d/b/a National Grid
In the Matter of Proactive Planning for Upgraded Electric Grid Infrastructure - Case 24-E-0364

Request for Information

FROM: PSC – Bradley Malmberg

TO: National Grid

SUBJECT: Project timing:

C093668 and C093670: Hancock 2 Station Upgrade (D-Line) - [redacted]

C093669 and C093671: Sand Rd 2 Station Upgrade (D-Line) - [redacted]

Request:

In all interrogatories, any requests for workpapers or supporting calculations shall be construed as requesting any Word, Excel, or other computer spreadsheet models in original electronic format with all formulae intact and unlocked.

For the following projects listed in National Grid Urgent Upgrades Appendix 4 – Confidential:

a) C093668 and C093670: Hancock 2 Station Upgrade (D-Line) - [redacted] (pdf pg. 161-163)

b) C093669 and C093671: Sand Rd 2 Station Upgrade (D-Line) - [redacted] (pdf pg. 164-166)

Pdf pages 161 and 164 state that the campus and electric vehicle load will double at the [redacted] site by 2035; however, both projects have an in-service date of 11/18/2026.

1. Explain why the projects, in a and b above, need to be built by 11/2026 if the load will not double until 2035.

Response:

1. Estimates the Company received from [redacted] show load at [redacted] will double by 2035, however, the facilities proposed for upgrade also face an immediate constraint. The proposed projects are needed to serve load for the near-term constraint, as well as the forecasted load growth at [redacted] from 2025 to 2035.

Currently, the Hancock 2 feeder is close to 100% of its rated capacity and cannot accommodate the existing load request from [redacted], nor the additional load growth forecasted by [redacted] between now and 2035. Additionally, given the [redacted], the Company serves the [redacted]. As the Hancock 2 feeder needs to be upgraded to accommodate growing load, the Company must do the equivalent work to Sand Road 2 feeder. As indicated in Attachment 1 to the Company's response to DPS-001 and shown again below, the limitation at the feeder is urgent. The proposed projects would alleviate existing and future constraints forecasted in the area between now and 2035.

As noted above, given [redacted], the Company serves [redacted]. Therefore, upgrades made at Hancock 2 and Sand Road 2 allow both substations and feeders to [redacted] current and forecasted loads, and therefore both projects are required.

Funding Number	Project Name	Current available Capacity Headroom in load pocket (MW)	Projected available Capacity Headroom in load pocket by 2030 (MW)	Projected available Capacity Headroom in load pocket by 2035 (MW)	Projected available Capacity Headroom in load pocket by 2040 (MW)
C093668	Hancock 2 Station Upgrade (D-Line)	-0.33	-3.55	-5.46	-6.62
C093670	Hancock 2 Station Upgrade (Station)	-0.07	-3.29	-5.21	-6.34
C093669	Sand Rd 2 Station Upgrade (D-Line)	-0.29	-3.44	-5.25	-6.28
C093671	Sand Rd 2 Station Upgrade (Station)	-0.05	-3.30	-5.31	-6.47

Name of Respondent:
Brian Wilkie

Date of Reply:
March 10, 2025

Date of Request: March 7, 2025 Request No. DPS-NMPC-005
Due Date: March 17, 2025 NG Request No. n/a

Niagara Mohawk Power Corporation d/b/a National Grid
Case No. 24-E-0364
In the matter of Proactive Planning for Upgraded Electric Grid Infrastructure

Request for Information

FROM: PSC - Jerry Ancona

TO: National Grid

SUBJECT: Cost Estimates

Request:

In all interrogatories, any requests for workpapers or supporting calculations shall be construed as requesting any Word, Excel, or other computer spreadsheet models in original electronic format with all formulae intact and unlocked.

Referring to Appendix 4 of the Company's 11/23/2024 Proactive Planning Urgent Upgrade Projects filing, provide a detailed definition, including estimate ranges, for each of the following "Estimate Grades":

a) 0
b) Conceptual
c) Planning
d) 4.0
e) 4.2
f) 4.1 Need Identification
g) 4.2
h) 4.3 Development & Sanction
i) 4.4A Final Eng
j) $300,000
k) N/A
l) "Blank – No Entry"

Response:

Please see Attachment 1, where the updated and corrected estimate grades are listed for the project description sheets submitted under Appendix 4. The Estimating Grades provided by National Grid reflect the Company's Network Development Process (NDP). The NDP is a stage gate process that provides for review and refinement of aspects of a project and offers guidelines for estimating complex projects (*i.e.*, estimate grades). Non-Complex projects follow a similar although more streamlined process for estimate grades; *e.g.*, certain estimate

grades are not performed for lower complexity projects and therefore certain stages are not captured. Each category of projects goes through established NDP stages that refine project scope, estimates, and timelines. In Attachment 1, the Company provides updated or corrected estimating grades for each project, also noting whether the projects are complex or non-complex.

The Estimating Grade for each **complex** project is explained below:

4.0 - Conceptual projects that have been identified via load forecast, system need, or mandated upgrades. These projects have a preliminarily identified system need and a high-level estimate in terms of cost and timeline.

4.1 - Needs-Case Development, various alternative solutions may be considered with a preferred option identified for analysis. An estimate is created for the preferred option. The preferred solution option is incorporated into forecasts of capital spending and ultimately into the Capital Investment Plan.

4.2 - Option Selection stage. Review and analyze high-level options, comparing them for scope, cost, real estate/permitting, constructability, and risks to complete the project by the need date. Finalize consideration of opportunities to bundle scope.

4.3 - The Develop and Sanction stage advances National Grid’s commitment to the selected option, develop/plan/scope the project to the level needed for sanction, and have the project plan sanctioned and approved for final design and execution.

4.4A - This stage serves to prepare the project for external bid or for coordination and planning with internal construction resources. In this stage, the finalized engineering designs are developed, the designs are approved for construction, Long Lead Materials and permits are secured (or planned with high confidence), and other plans and deliverables are further developed.

4.4B - This stage looks to construction activities from strategic sourcing (external) or work package (internal) through testing and commissioning. At the close of this stage, the project is fully operational and ready for closeout. Going forward, the project will become a functioning asset operated by Field Operations with in-service facility oversight handled by Asset Management.

4.5 - This stage focuses on ensuring that the project is fully complete, that all tasks and commitments have been fulfilled, from a financial, construction, and stakeholder perspective, and that the project is ready for close.

The Estimating Grade for each **non-complex** project is explained below:

4.0 - Conceptual projects that have been identified via load forecast, system need, or mandated upgrades. These projects have a preliminarily identified system need and a high-level estimate in terms of cost and timeline.

4.1 - Needs-Case Development, various alternative solutions may be considered with a preferred option identified for analysis. An estimate is created for the preferred option. The preferred solution option is incorporated into forecasts of capital spending and ultimately into the Capital Investment Plan.

4.3 - The Develop and Sanction stage advances National Grid's commitment to the selected option, develop/plan/scope the project to the level needed for sanction, and have the project plan sanctioned and approved for final design and execution.

4.4A - This stage serves to prepare the project for external bid or for coordination and planning with internal construction resources. In this stage, the finalized engineering designs are developed, the designs are approved for construction, Long Lead Materials and permits are secured (or planned with high confidence), and other plans and deliverables are further developed.

4.4B - This stage looks to construction activities from strategic sourcing (external) or work package (internal) through testing and commissioning. At the close of this stage, the project is fully operational and ready for closeout. Going forward, the project will become a functioning asset operated by Field Operations with in-service facility oversight handled by Asset Management.

4.5 - This stage focuses on ensuring that the project is fully complete, that all tasks and commitments have been fulfilled, from a financial, construction, and stakeholder perspective, and that the project is ready for close.

Name of Respondent: Doug Ayer

Date of Reply: March 17, 2025

REDACTED to remove confidential information.

Funding Number	Project Name	Estimating Grade in Filed PDS	Complex/Non-Complex Project	Current Estimating Grade	Correction/Update
C094381	Angola Service Plaza T Line	4.2	Complex	4.2	Update
C094391	Angola Service Plaza sub T Line	4.2	Complex	4.2	Update
C094390	New substation Angola	4.2	Complex	4.2	Update
C094380	New Substation Alleghany Rd	4.2	Complex	4.2	Update
C094387	Alleghany Rd New D Line Pembroke(Alleghany Rd)	4.2	Complex	4.2	Update
C094378	Alleghany Rd New T Line Pembroke(Alleghany Rd)	4.2	Complex	4.2	Update
C094393	Pattersonville Substation new	4.2	Complex	4.2	Update
C095527	Pattersonville Feeder Regulator	4.2	Non-Complex	4.1	Correction
C094389	T Line Taps for New Pattersonville sub	4.2	Complex	4.2	Update
C094392	New Double Circuit D Line Pattersonville Sub	4.2	Complex	4.2	Update
C094394	New Moore Road Distribution Substation	4.2	Complex	4.2	Update
C094383	T Line Taps for New Moore Road Substation	4.2	Complex	4.2	Update
C094396	New Double Circuit D Line Moore Road Substation	4.2	Complex	4.2	Update
C094400	Gee Road Substation New	4.2	Complex	4.2	Update
C094386	Gee Road Substation T Line Taps	4.2	Complex	4.2	Update
C094401	New Gee Road Substation Double Circuit Dline	4.2	Complex	4.2	Update
C094585	Angola Mobile BESS	0	Complex	4.0	Correction
C094584	Chittenango Mobile BESS	0	Complex	4.0	Correction
C094583	Guilderland Mobile BESS	0	Complex	4.0	Correction
CXXXXX	Battery 2 interconnection	0	Awaiting to determine specific siting location to understand scope of work needed for interconnection. Currently not determined.	4.0	Correction
CXXXXX	Battery 3 interconnection	0	Awaiting to determine specific siting location to understand scope of work needed for interconnection. Currently not determined.	4.0	Correction
C093762	Valkin Substation Upgrade	Conceptual	Complex	4.0	Correction
C093806	Valkin Substation 427 D Line Upgrades	Conceptual	Complex	4.0	Correction
C097372	Cortland Rest Stop EV Charging	Conceptual	Non-Complex	4.0	Correction
C097423	Teall Ave 7258 Feeder Upgrade	4.2	Non-Complex	4.0	Correction
C097421	EV Chargers Watertown Rest Stop	Conceptual	Non-Complex	4.0	Correction
C097300	Wilton 3rd Breaker Install	Conceptual	Complex	4.0	Correction
C097302	Wilton 13.2kV Double Circuit	Conceptual	Complex	4.0	Correction
C097301	Wilton SubT Double Circuit	Conceptual	Complex	4.0	Correction
C089710	Angola 4.8-13.2kV reconductor	Conceptual	Non-Complex	4.4A	Correction
C092845	[redacted]	N/A	Non-Complex	4.3	Correction
C09XXX	[redacted]	Blank	Awaiting load request to begin scoping. Currently not determined	4.0	Correction
C092948	EV Upgrades 81458	Blank	Non-Complex	4.3	Correction
C092949	EV Upgrades 89553	Blank	Non-Complex	4.3	Correction
C092951	EV Upgrades 86942	Blank	Non-Complex	4.3	Correction
C092952	EV Upgrades 93662	Blank	Non-Complex	4.3	Correction
C093619	Colosse 2nd bank	Blank	Non-Complex	4.4A	Correction
C093499	Colosse 2nd bank	Blank	Non-Complex	4.4A	Correction
C096326	[redacted]	Conceptual	Awaiting load request to begin scoping. Currently not determined	4.0	Correction
CXXXXX	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
CXXXXX	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
CXXXXX	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
CXXXXX	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
CXXXXX	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
CXXXXX	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
CXXXXX	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
CXXXXX	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
C096246	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update
C096247	[redacted]	4	Awaiting load request to begin scoping. Currently not determined	4.0	Update

C095803	[redacted]	N/A	Complex	4.4A	Correction
C095804		N/A	Complex	4.4A	Correction
C094748		N/A	Non-Complex	4.4A	Correction
C094749		N/A	Non-Complex	4.4A	Correction
C092982		N/A	Complex	4.4B	Correction
C092646		N/A	Complex	4.4B	Correction
C092126		N/A	Complex	4.4B	Correction
C092111		N/A	Non-Complex	4.5	Correction
C091654		N/A	Non-Complex	4.5	Correction
C090952		N/A	Non-Complex	4.4A	Correction
C092963		N/A	Non-Complex	4.4A	Correction
C074906	Station 3012 Sub-T	4.4A Final Eng	Complex	4.5	Update
C074911	Station 3012 D-Line	4.4A Final Eng	Complex	4.5	Update
C085610	Station 3012 D-Line	4.4A Final Eng	Complex	4.4B	Update
C074909	Station 3012 Station	4.4A Final Eng	Complex	4.4B	Update
C094790	[redacted]	4.4A Final Eng	Complex	4.4B	Update
C093668	Hancock 2 Station Upgrade (D-Line)	Blank	Non-Complex	4.4A	Correction
C093670	Hancock 2 Station Upgrade (Station)	Blank	Non-Complex	4.3	Correction
C093669	Sand Rd 2 Station Upgrade (D-Line)	N/A	Non-Complex	4.3	Correction
C093671	Sand Rd 2 Station Upgrade (Station)	N/A	Non-Complex	4.3	Correction
C093808	Central Utica Boutique Sub (D-Line)	300,000	Non-Complex	4.3	Correction
C093809	Central Utica Boutique Sub (Station)	300,000	Non-Complex	4.3	Correction
C09XXX	[redacted]	Blank	Awaiting load request to begin scoping. Currently not determined	4.0	Correction
C080474	Seventh Ave Transformer (Station)	Conceptual	Complex	4.2	Correction
C080475	Seventh Ave Transformer (D-Line)	Conceptual	Complex	4.2	Correction
C080476	Seventh Ave Transformer (D-Line)	Conceptual	Complex	4.2	Correction
C083916	Elsmere Substation Rebuild	Project	Complex	4.4A	Correction
C083917	Delmar 34.5 kV Reconfiguration	Project	Complex	4.4A	Correction
C083920	Elsmere - Feeder Getaways	Project	Complex	4.4A	Correction
C083926	Delmar Feeder Rebuild and Convert	Project	Complex	4.4A	Correction
C086902	Cobleskill Substation 4.8 to 13.2 kV Conversion (Station)	Conceptual	Complex	4.3	Correction
C091671	Cobleskill Substation 4.8 to 13.2 kV Conversion (D-Line)	Conceptual	Complex	4.3	Correction
C046536	Delameter Substation Rebuild (Station)	4.3 Development & Sanction	Complex	4.3	Update
C047877	Delameter Substation Rebuild (D-Line)	4.3 Development & Sanction	Complex	4.3	Update
C047885	Delameter Substation Rebuild (D-Line)	4.3 Development & Sanction	Complex	4.3	Update
C088133	State Campus- Menands #15 UG Replacement	4.1 Need Identification	Complex	4.2	Update
C081799	Pack-Gardenville T-Line Reconfig - Tran Line	Planning	Complex	4.3	Correction
C079506	Packard-Gardenville Station Upgrades - Tran Sub	Planning	Complex	4.3	Correction
C085043	Ludwig-Gardenville 704 34.5kV reloc - Sub-T Line	Planning	Complex	4.3	Correction

Date of Request: March 7, 2025 Request No. DPS-NMPC-009
Due Date: March 17, 2025 NG Request No. n/a

Niagara Mohawk Power Corporation d/b/a National Grid
Case No. 24-E-0364
In the matter of Proactive Planning for Upgraded Electric Grid Infrastructure

Request for Information

FROM: PSC - Jerry Ancona

TO: National Grid

SUBJECT: Proactive Planning Funding Numbers

Request:

In all interrogatories, any requests for workpapers or supporting calculations shall be construed as requesting any Word, Excel, or other computer spreadsheet models in original electronic format with all formulae intact and unlocked.

1. Provide Funding Numbers (i.e., Project ID Numbers) for the following National Grid projects, as defined in the Project Data Sheets of Appendix 4 of the Company's 11/23/2024 Proactive Planning Urgent Upgrade Projects filing (Note: the underlined italicized Project Names were redacted in the Company's filing and therefore are considered Confidential):

CXXXXX	Battery 2 interconnection
CXXXXX	Battery 3 interconnection
CXXXXX	North Aud
CXXXXX	[redacted]
CXXXXX	[redacted]
CXXXXX	[redacted]
CXXXXX	[redacted]
CXXXXX	[redacted]
CXXXXX	[redacted]
CXXXXX	[redacted]
C09XXX	[redacted]

2. If no Funding Number is available, provide a rationale for its unavailability.

Response:

1. The indicated projects do not yet have funding numbers.

2. Funding numbers have not been assigned to the indicated projects because of where they are in design and scoping maturity.

   For the building electrification projects, the Company has not yet received specific load requests from the identified customer projects. Once received, these load requests will help refine the scope of work, and subsequent engineering study and design of the project and solution. At that stage, funding numbers will be created and assigned.

   For the mobile battery interconnection projects, the Company is still assessing the location for Batteries 2 and 3. Once defined, the Company will build out the specific scope related to interconnecting the two units. Although some components of interconnection are universal, others are site specific. Once those are defined, funding numbers will be assigned to the projects.

Name of Respondent:
Jeff Wilke

Date of Reply:
March 17, 2025

Date of Request: March 7, 2025 Request No. DPS-NMPC-010
Due Date: March 20, 2025 NG Request No. n/a

Niagara Mohawk Power Corporation d/b/a National Grid
Case No. 24-E-0364
In the matter of Proactive Planning for Upgraded Electric Grid Infrastructure

Request for Information

FROM: PSC - Jerry Ancona

TO: National Grid

SUBJECT: Project Needs - Confidential

Request:

In all interrogatories, any requests for workpapers or supporting calculations shall be construed as requesting any Word, Excel, or other computer spreadsheet models in original electronic format with all formulae intact and unlocked.

1. As listed on the attached Excel Spreadsheet, for each of the projects included in Appendix 4 of the Company's 11/23/2024 Proactive Planning Urgent Upgrade Projects filing (Note: the underlined italicized Project Names list on the attached Excel spreadsheet were redacted in the Company's filing and therefore are considered Confidential) provide the following:

Initial Need

a) Initial Need Date (MM/YYYY)
b) Initial Amount Needed Above the Existing System Capability in MVA for Electrification Load
c) Initial Amount Needed Above the Existing System Capability in MVA for Other (Non-Electrification) Load Growth
d) Initial Total Amount Needed Above the Existing System Capability in MVA for Both Electrification and Other Load Growth

Reasons for Initial Need and Facilities and/or Circuits Affected - One or More of the Following:

e) List the Facility or Circuit Affected by Thermal Over-Load Violations
f) List the Facility or Circuit Affected by Low Voltage Violations
g) List the Facility from Which Circuit Extension is Needed
h) Other Reason for Need

Total Longer-Term Need

i) Need Date for Total Expected Load (MM/YYYY)
j) Total Amount Needed Above the Existing System Capability in MVA for Electrification Load
k) Total Amount Needed Above the Existing System Capability in MVA for Other (Non-Electrification) Load Growth
l) Total Amount Needed Above the Existing System Capability in MVA for Both Electrification and Other Load Growth

Response:

1. Please see Attachment. The initial need date indicated for each project is the year that forecasted system requirements (e.g., loading, voltage) exceed system capability and/or support new customer driven interconnections requirements. Responses to b, c, d, j, k, and l reflect non-contingent forecasted system load increases and/or customer-driven interconnection load requirements. However, projects scopes (e.g., transformer and conductor sizes) are built to support relevant forecasted contingent (i.e., N-1, N-1-1) system loading.

Name of Respondent:
Jeff Wilke

Date of Reply:
March 20, 2025

Niagara Mohawk/National Grid - Proactive Planning Urgent Projects Needs - 24-E-0364

Project Name - NOTE: Italic/Underlined Names are CONFIDENTIAL	Initial Need								Total Longer Term Need			
		Amount of Need			Reason for Need					Total Amount of Need		
	a. Initial Need Date (MM/YYY)	b. Initial Electrification MVA Need Above Existing Capability	c. Initial Other Load Growth MVA Need Above Existing Capability	d. Initial Total MVA Need Above Existing Capability	e. Facility or Circuit Affected by Thermal Over-Load Violation	f. Facility or Circuit Affected by Low Voltage Violation	g. Facility from Which Circuit Extension is Needed	h. Other Reason for Need	i. Need Date for Total (MM/YYY)	j. Total Electrification MVA Need Above Existing Capability	k. Total Other Load Growth MVA Need Above Existing Capability	l. Total MVA Need Above Existing Capability
Gee Road Substation New - Chittenango	2028	0.9	0.0	0.9	Bridgeport 15853	Bridgeport 15853	Bridgeport Substation		2040	7.9	0.0	7.9
Moore Road New Distribution Substation - Dewitt	2027	0.1	0.0	0.1	East Molloy and Teall Avenue substations and associated feeders	East Molloy and Teall Avenue substations and associated feeders			2040	9.0	0.0	9.0
Pattersonville Substation new - West of Schenectady	2031	0.2	0.0	0.2	Florida 50153; Florida substation	Florida 50153; Florida substation	Florida substation		2040	10.1	0.0	10.1
Angola Service Plaza T Line - South of Buffalo	2025	1.7	3.7	5.4	Delameter Substation	Delameter Station Feeder 9352	Delameter Substation		2040	26.2	10.9	37.1
Alleghany Rd New Substation East of Buffalo	2026	1.7	0.0	1.7	Knapp Road substation; Knapp Road 22651		Knapp Road substation		2040	30.7	0.0	30.7
Ang-Chitt-Guild Mobile Battery Energy Storage	2025	N/A										
Angola 4.8-13.2kV reconductor	2025	5.4	0.0	5.4	Delameter 9352	Delameter 9352	Delameter Substation		2040	10.9	0.0	10.9
Wilton 3rd Breaker Install & New 34.5 kV & 13.2 kV Ckts	2029	3.7	0.0	3.7	Wilton 51; and Wilton substation	Wilton 51; and Wilton substation	Wilton Substation		2040	34.4	0.0	34.4
Cortland Rest Stop EV Charging I-81	2026	0.2	0.0	0.2	Cortland Station; Cortland 50203	Cortland 50203	Sub-T Cortland 20		2040	9.3	0.0	9.3
Teall Ave 7258 Feeder Upgrade - East Syracuse	2030	0.1	0.0	0.1	Teall Ave 7258		Teall Ave Substation		2040	2.5	0.0	2.5
Val Kin Substation Upgrade	2031	1.2	0.0	1.2	Val Kin Substation; Val Kin 42754; Val Kin 42753; Val Kin 42752	Val Kin Substation; Val Kin 42754; Val Kin 42753; Val Kin 42752	Val Kin 42754		2040	20.5	0.0	20.5
Watertown Rest Stop EV Chargers I-81	2030	0.0	0.0	0.0	Coffeen 76055		Coffeen Substation	feeder directly serving the industrial zone of Watertown. Since the Company's granular study of the area, a large new truck service plaza has been built in the area. Aerial imaging of the area	2040	0.0	0.0	0.0
[redacted]	2026	0, Initial project listed is to support voltage concerns, not thermal concerns	1.7	1.7	Grooms Rd 34551	Grooms Rd Station Feeder 34551			2040	0, Initial project listed is to support voltage concerns, not thermal concerns	5.1	5.1
Colosse 2nd bank - EV Charging - I-81	2025	0.7	0.0	0.7	Colosse Substation and Feeder Circuits				2040	4.0	0.0	4.0
[redacted]	In Service	0, Project in service.	Not Applicable	0, Project in service.	Southland Station Feeder 8462				In Service	0, Project in service.		0, Project in service.
	2029	0. This project is to support voltage concerns, not thermal concerns.	0. This project is to support voltage concerns, not thermal concerns.	0. This project is to support voltage concerns, not thermal concerns.		Thousand Islands Station Feeder 81458			2029	0. This project is to support voltage concerns, not thermal concerns.		0. This project is to support voltage concerns, not thermal concerns.
	2029	0. This project is to support voltage concerns, not thermal concerns.	0. This project is to support voltage concerns, not thermal concerns.	0. This project is to support voltage concerns, not thermal concerns.		Malone Station Feeder 89553			2029	0. This project is to support voltage concerns, not thermal concerns.		0. This project is to support voltage concerns, not thermal concerns.
	2029	0. This project is to support voltage concerns, not thermal concerns.	0. This project is to support voltage concerns, not thermal concerns.	0. This project is to support voltage concerns, not thermal concerns.		Fort Covington Station Feeder 89642			2029	0. This project is to support voltage concerns, not thermal concerns.		0. This project is to support voltage concerns, not thermal concerns.
	2025	1.9	0	1.9	Teall Ave Station Feeder 7255		[redacted]		2025	1.9	0	1.9
	2029	0. This project is to support voltage concerns, not thermal concerns.		0. This project is to support voltage concerns, not thermal concerns.		Norwood Station Feeder 93662			2029	0. This project is to support voltage concerns, not thermal concerns.		0. This project is to support voltage concerns, not thermal concerns.
	2028	5.2	0.0	5.2	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2028	5.2	0.0	5.2
	2028	2.4	0.0	2.4	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2028	2.4	0.0	2.4
	2028	1.4	0.0	1.4	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2028	1.4	0.0	1.4
	2028	3.8	0.0	3.8	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2028	3.8	0.0	3.8
	2029	5.0	0.0	5.0	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2029	5.0	0.0	5.0
	Awaiting Customer Request	Awaiting Customer load request, but load request is expected to be greater than 1 MVA	0	Awaiting Customer load request, but load request is expected to be greater than 1 MVA	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				Awaiting Customer Request	Awaiting Customer load request, but load request is expected to be greater than 1 MVA		Awaiting Customer load request, but load request is expected to be greater than 1 MVA

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Project Name - NOTE: Italic/Underlined Names are CONFIDENTIAL	Initial Need								Total Longer Term Need			
		Amount of Need			Reason for Need					Total Amount of Need		
	a. Initial Need Date (MM/YYY)	b. Initial Electrification MVA Need Above Existing Capability	c. Initial Other Load Growth MVA Need Above Existing Capability	d. Initial Total MVA Need Above Existing Capability	e. Facility or Circuit Affected by Thermal Over-Load Violation	f. Facility or Circuit Affected by Low Voltage Violation	g. Facility from Which Circuit Extension is Needed	h. Other Reason for Need	i. Need Date for Total (MM/YYY)	j. Total Electrification MVA Need Above Existing Capability	k. Total Other Load Growth MVA Need Above Existing Capability	l. Total MVA Need Above Existing Capability
[redacted]	2028	2.6	0		Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer		[redacted]		2028	2.6	0	2.6
[redacted]	This Project is no longer proceeding and will be removed in a future update	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	This Project is no longer proceeding and will be removed in a future update	Not Applicable	Not Applicable	Not Applicable
	2027	2.7	0.0	2.7	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2027	2.7	0.0	2.7
	2026	2.6	0.0	2.6	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2026	2.6	0.0	2.6
	2025	1.3	0.0	1.3	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2025	1.3	0.0	1.3
	In Service	1.9	0.0	1.9	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				In Service	1.9	0.0	1.9
	In Service	2.2	0.0	2.2	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				In Service	2.2	0.0	2.2
	2026	1.8	0.0	1.8	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2026	1.8	0.0	1.8
	2025	4.1	0.0	4.1	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2025	4.1	0.0	4.1
	2025	4.1	0.0	4.1	Local 4.16kV infrastructure would be overloaded, due to high load demand from this customer				2025	4.1	0.0	4.1
	2025	0.3	0.0	0.3	Hancock #2 Substation and Feeder Circuits				2040	0.5	0.0	0.5
	2025	0.3	0.0	0.3	Sand Rd #2 Substation and Feeder Circuits				2040	0.3	0.0	0.3
	2025	1.5	0.0	1.5	Pleasant and Conklin Substations and Feeder Circuits				2040	3.4	0.0	3.4
	2026	0, Starting Load request is able to be served by existing infrastructure. Load increases will continue to ramp up with continued development.	0	0, Starting Load request is able to be served by existing infrastructure. Load increases will continue to ramp up with continued development.	Multiple Feeder Circuits from the Temple Substation		[redacted]		2040	11.0	0.0	11.0
Seventh Ave Transformer (Station) - Troy	2025	0.6	0.0	0.6	Seventh Ave Substation and Feeder Circuits				2040	1.4	0.0	1.4
Elsmere Substation Rebuild - Delmar	2028	0.2	0.0	0.2	Elsmere and Delmar Substations and Feeder Circuits				2040	3.1	0.0	3.1
Cobleskill Substation 4.8 to 13.2 kV Conversion	2025	0.6	0.0	0.6	Cobleskill Substation and Feeder Circuits				2040	4.6	0.0	4.6
Delameter Substation Rebuild (Station)	2025	5.4	0.0	5.4	Delameter Substation and Feeder Circuits				2040	10.9	0.0	10.9
Pack-Gardenville T-Line Reconfig - Tran Line	2025	0.0	0.0	0.0	Packard-Gardenville Transmission Line	Packard-Gardenville Transmission Line		Based on forecasting caused by increased electrification, this project looks to ensure the most effective way to relieve potential overloads during N-1 and N-1-1 conditions.	2040	0.0	0.0	0.0
State Campus- Menands #15 UG Replacement	2025	0.0	0.0	0.0	State Campus - Menands #15 Transmission Line	State Campus - Menands #15 Transmission Line		Based on forecasting caused by increased electrification, this project looks to ensure the most effective way to relieve potential overloads during N-1 and N-1-1 conditions.	2040	0.0	0.0	0.0