

# New York Transmission Owners Compliance Proposal



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# New York Transmission Owners

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

# The Final Order 890 Rule

“In order to limit the opportunities for undue discrimination... and to ensure that comparable transmission service is provided by all public utility transmission providers, including RTOs and ISOs, the Commission concludes that it is necessary... to require coordinated, open, and transparent transmission planning on both local and regional level.” (¶ 435)

- “In order for an RTO’s or ISO’s planning process to be open and transparent, transmission customers and stakeholders must be able to participate in each underlying transmission owner’s planning process.” (¶ 440)
- [Therefore] “individual TOs must, to the extent that they perform transmission planning within an RTO or ISO, comply with the Final Rule as well.” (¶ 440)

# Objectives of the Presentation

- Present the New York Transmission Owners (NY TOs) proposal for compliance with the planning provisions of Order 890 acting within the NYISO
- Offer the NY TOs proposal as a model for neighboring ISO/RTOs

# The New York Environment for Compliance with Order 890

- NY TOs do not provide transmission services, only the NYISO does
  - There are no opportunities for NY TOs to discriminate in the provision of transmission services
- NY TOs will comply with the provisions of Order 890 through their participation under the NYISO processes
  - Complying with the provisions involving TO planning processes are discussed herein
- NY TOs plan for the reliability of their local systems, which become inputs into the NYISO stakeholder processes for:
  - System Reliability Impact Studies
  - Generation Interconnection
  - FERC Form 715
  - NYISO Gold Book
  - Comprehensive Reliability Planning Process

# Order 890 Guiding Paragraphs

- Involving transmission customers and stakeholders (§ 440)
- Disclosing basic criteria in writing (§ 471)
- Providing status of upgrades in their plans (§ 472)
- Protecting confidentiality of customer information (§ 476)
- Providing customers and stakeholders with a meaningful opportunity for input into the planning process (§ 488)
- Considering both reliability and economic planning (§ 542)
- Encouraging State participation in planning process (§ 574)

# Proposal for Compliance with TO Planning Provisions of Order 890

Disclosure of Planning Criteria and Assumptions, posted (§ 471)

NY TO Plans Reported to Customers and Stakeholders, Posted (§ 472, 476)

From NYISO  
(Load Forecasts and Modeling Data)



Customers and Stakeholder Meeting to Discuss Each NY TO Plan (§ 440)

Includes State Participation (§ 574)



Written Comments from Customers and Stakeholders Submitted and Posted (§ 488)

Note: Committed NY TO Plans Incorporated into NYISO's Comprehensive Reliability Planning Process (§ 542)

# Proposed Time Line for Local TO Planning Process

(Not part of a periodic process)	Disclosure of Planning Criteria and Assumptions
December	TO Plans Reported to Customers and Stakeholders
February	Customers and Stakeholder Meeting to Discuss TO Plans and Criteria
March	Customers and Stakeholder Provide Written Comments
April	Committed TO Plans are Incorporated into NYISO Planning Process

# NY TOs Proposal for Compliance with the Planning Principles of Order 890

Order 890 Principles	Proposal for Achieving Compliance
Coordination	Customer and stakeholder meeting to discuss TOs Report on their plans
Openness	Meeting notices posted on NYISO OASIS
Transparency	Basic local planning criteria and assumptions disclosed and posted
Information Exchange	Reporting on TO plans and providing customers and stakeholders with meaningful opportunity to engage in planning through meeting and comments
Comparability	Proposed process will treat similarly situated customers in a comparable manner
Dispute Resolution	NYISO or existing FERC processes used as appropriate for FERC jurisdictional projects
Regional Participation	Through NYISO process
Economic Planning Studies	Through NYISO process
Cost Allocation for New Projects	NYISO cost allocation mechanisms apply for projects that utilize the NYISO tariff; otherwise existing TO rate mechanisms apply