



contingency and pose a potential threat to the reliability of the New York State transmission grid. The amended filing addresses, to some extent, the concerns raised by the NYSRC in its initial comments. However, the NYSRC continues to have concerns with respect to several aspects of the proposed route of the Millennium Project. We understand that the Commission must balance various, sometimes conflicting, considerations in evaluating a major pipeline project, such as the Millennium Project. The NYSRC believes that the Commission is in the best position to balance all relevant factors and reach a final determination. Nevertheless, these comments are intended to advise the Commission of the continuing concerns that the NYSRC has with respect to the potential impact of the Millennium Project on the State's bulk power transmission system and to make the Commission aware that further revisions to mitigate those concerns would enhance the Millennium Project from the perspective of electric reliability.

## **II. Comments**

The following is a description of the aspects of the amended Millennium Project proposal that continue to be of concern to the NYSRC.

### **1. Areas Paralleling Electric Transmission Lines in Westchester.**

The proximity of the Millennium Project's 24 inch interstate pipeline to electric transmission circuits at some locations and especially those in the two to three mile section just north and south of Eastview substation are of serious concern. In this section, (from approximately mile marker MP 404 in the vicinity of Buckhout Corners to MP 405.1 and continuing to MP 408 and again for approximately 2500 feet in the area south of Eastview) the pipeline will be running essentially contiguous to the electric transmission right-of-way (i.e. less than 100 feet away). An incident in this area could cause the loss of all four circuits supplying

power to the Eastview substation. It may also cause loss of a major source of power supply to the New York City metropolitan area as described in items (a) and (b) below.

(a) Loss of Supply to Westchester County From the Eastview Substation

At the Eastview substation there are four 345/138kV transformers which ultimately feed the Elmsford, White Plains and Harrison substations. These four transformers are fed by four 345 kV circuits running south of the Millwood area to the Sprain Brook substation. The four transformers are tee-tapped; therefore, loss of these four circuits caused by a major pipeline incident in any part of the contiguous areas would result in the loss of approximately 625 MW of load. This means that a substantial portion of highly populated Westchester County would be blacked out. Returning the power supply to this area would be extremely difficult depending upon the damage sustained by the towers, conductors and insulators.

In addition, these circuits are also used to supply New York City and Long Island as described below.

(b) Loss of Supply to New York City and Long Island

The four circuits between the Millwood area and Sprain Brook substation are rated at approximately 1720 MW each. If these circuits are damaged, rotating blackouts in New York City may be required because there would be insufficient remaining transmission and generation capability to supply all of the New York City load. Such an incident could require keeping major portions of metropolitan area blacked out for many hours each day until the circuits are returned to service, which may take many days depending upon the severity of the physical damage sustained by the facilities. Such an incident also may reduce the gas supply to generation in New York City and thereby reduce the amount of available generation.

These concerns could be alleviated by keeping the pipeline an adequate distance from the electric right of ways, so that the electric circuits would not trip or be damaged in the event of a pipeline incident.

2. Crossings

The second area of concern relates to the five crossings of electric circuits by the pipeline. The issues discussed in Paragraph 1 also apply to the locations where the pipeline crosses the four circuits. Crossing of the electric right of way between Millwood and Dunwoodie substations should be avoided, if possible, from the perspective of the reliability of electric supply.

**Conclusion**

The NYSRC recognizes that various factors must be considered and balanced by the Commission in reviewing a major pipeline project. Still, the NYSRC believes that it has a responsibility to advise the Commission of its continued concerns with respect to the potential impact of the Millennium Project and to advise the Commission that further revisions to the project to mitigate these concerns would be beneficial from the perspective of electric system reliability.

Respectfully Submitted,

**New York State Reliability Council, L.L.C.**



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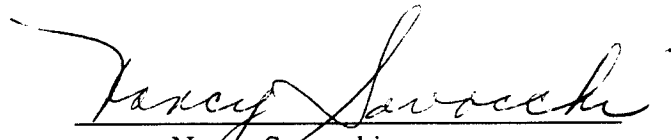
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person who is designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Washington, D.C. this 27th day of July, 2000

  
Nancy Savocchi