Comments of the New York State Reliability Council, LLC in Support of the United States Department of Energy Grid Deployment Office's Initiation of Phase 2 of National Interest Electric Transmission Corridor

These comments are submitted on behalf of the New York State Reliability Council, LLC ("NYSRC") to the United States Department of Energy ("DOE") in response to the Grid Deployment Office's *Initiation of Phase 2 of National Interest Electric Transmission Corridor* ("NIETC"). These comments are limited to addressing Category 13 of the NIETC report related to Reliability and Safety. The NYSRC appreciates DOE's consideration of these comments.

The NYSRC is a reliability organization approved by the Federal Energy Regulatory Commission and is responsible for the development and the enforcement of Reliability Rules necessary for the safe and reliable operation of the New York State bulk power electric system. The regional system operator – the New York State Independent System Operator, Inc. ("NYISO") – and all organizations participating in the NYISO's competitive wholesale electricity markets must comply with the rules adopted by the NYSRC.

The NYSRC supports the DOE's NIETC endeavor. Since the advent of electricity systems, it has been recognized that interconnected systems benefit reliability and resiliency under normal and emergency conditions, as well as reduce costs to customers. New York State recognized this fact early on by establishing the New York State Power Pool, an agreement among all the electric utilities in New York to jointly plan and operate the high voltage grid based on agreed upon reliability standards. In the late 1990s, FERC issued a series of order that transformed the existing power pools into Independent System Operators/Regional Transmission Operators. The NYISO was created because of those FERC orders, and in addition, the NYSRC was proposed and approved by FERC. The NYSRC was created to capture and expand upon the existing reliability rules for New York State, to establish an independent reliability entity to oversee the maintenance and creation of reliability rules, and to determine the annual Installed Reserve Margin ("IRM") for New York State.

Interregional systems help provide a level of operational flexibility that translates directly into increased resiliency. Specifically, the NYSRC supports the improved interconnection capability with PJM and New England that would result from NIETC's New York – New England and New York – Mid-Atlantic proposed projects. In turn, the benefits of these two projects would be enhanced by the Mid-Atlantic – Canada (New York to Connecticut) and the Mid-Atlantic projects (New Jersey to New York City) proposed by DOE in Phase 2.

As an example of increased resiliency, the NYSRC can cite its own experience in Resource Adequacy studies that it performs annually to establish the IRM in New York, as well as its observations regarding neighboring systems. New York and other New England states have embarked on transforming the grid into a cleaner energy system. Older plants are being phased out and clean renewable plants are being added. At the same time, the environmental effect of extreme weather impacts is causing increasing threats to reliability. Extreme weather events do

not respect geographic boundaries. The greater the interconnected capability of the geographical areas, the greater the probability that not all the areas are impacted by simultaneous extreme weather, making it possible for those portions of the expanded interconnected system to be able to provide emergency assistance through expanded interregional transmission corridors.

An example of the benefits of the interconnected nature of the grid is the recent 2022 Winter Storm Elliott weather event. The associated FERC/NERC Report detailed how neighboring power systems supported each other during the extremely cold weather event. A key aspect of that event was not only the importance of interconnected tie lines to support supply/demand stresses but also the importance of having a fuel diverse generation supply to depend upon. Maintaining and improving interconnected transmission capability, coupled with diverse generation portfolios, will be necessary in the future as more regions of the United States transition to a cleaner energy system.

In summary, the NYSRC applauds DOE's NIETC initiative that is critically important in the coming years to achieve societal environmental goals while maintaining and enhancing the electric system's existing reliability levels. Further, this initiative must be coupled with diverse generation portfolios that perform under different seasonal variations and extreme weather challenges.

We appreciate the opportunity to participate in this proceeding and look forward to additional involvement at later phases of this process.

Respectfully submitted,

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Dated: June 24, 2024
Albany, New York