

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Interregional Transfer Capability Study:**                    )  
**Strengthening Reliability Through**                    )  
**the Energy Transformation**                                )

**Docket No. AD25-4-000**

**COMMENTS OF THE NEW YORK STATE RELIABILITY COUNCIL  
IN RESPONSE TO THE NERC INTERREGIONAL TRANSFER CAPABILITY STUDY**

On November 19, 2024, the North American Electric Reliability Corporation (“NERC”) filed an Interregional Transfer Capability Study (“ITCS” or “Study”) with the Federal Energy Regulatory Commission (“Commission”).<sup>1</sup> The ITC Study includes: (i) an assessment of the current total transfer capability between neighboring transmission planning regions; (ii) recommendations for prudent additions to total transfer capability between neighboring transmission planning regions to enhance reliability within these regions; and (iii) suggestions for maintaining total transfer capability together with recommended prudent additions between neighboring transmission planning regions. On December 27, 2024, the Commission issued a Notice of Request for Comments on NERC’s Study.<sup>2</sup> The New York State Reliability Council, L.L.C. (“NYSRC”) hereby submits the following comments for consideration by the Commission in response to the Notice.

**I. Introduction**

The NYSRC is a not-for-profit entity, organized in 1999 and authorized by the Commission, whose mission is to promote and preserve the reliability of electric service on the

---

<sup>1</sup> Docket No. AD25-4-000, *North American Electric Reliability Corporation Interregional Transfer Capability Study As Directed in the Fiscal Responsibility Act of 2023* (filed Nov. 19, 2024).

<sup>2</sup> Docket No. AD25-4-000, *Notice of Request for Comments* (issued Dec. 3, 2024).

New York State Power System by developing, maintaining, and updating the Reliability Rules which shall be complied with by the New York Independent System Operator, Inc. (“NYISO”) and all entities engaging in electric transmission, ancillary services, energy and power transactions on the New York State Power System. The NYSRC conducts its mission with no intent to advantage or disadvantage any Market Participant’s commercial interests. Its sole focus is maintaining the reliability of the bulk electric system in the New York Control Area (“NYCA”). In accordance with the NYSRC’s focus and mission, the NYSRC supports and reiterates the comments submitted by the NYISO to the Commission in this proceeding.<sup>3</sup>

## **II. Comments**

The NYSRC supports the notion that studying the Bulk Power System and total transfer capability between each pair of neighboring transmission planning regions in the U.S. and Canada could provide valuable information to the electric industry and help inform regional planning and system operations. The NYSRC supports the NYISO’s comments because as the planning coordinator it has the technical capabilities to prudently assess the need for increased interregional transfer capability between its control area and neighboring control areas. At the Commission’s recent February 20, 2025 meeting, there was a discussion regarding how resource adequacy and resiliency are a current focus of the Commission and that both purposes are served by having an ability to transfer electricity between regions.<sup>4</sup> The NYSRC is supportive of and agrees with this focus.

---

<sup>3</sup> See Comments of the New York Independent System Operator, Inc. (“NYISO”) submitted in this docket. The NYSRC supports and reiterates the NYISO comments submitted in this proceeding on the ITCS.

<sup>4</sup> Open Meeting of the Federal Energy Regulatory Commission (February 20, 2025) (general discussion of the Commissioners on resource adequacy and resiliency), <https://www.ferc.gov/news-events/events/february-20-2025-open-meeting-10022024> (last visited February 25, 2025).

The NYISO collaborates with and has strong interregional ties with its regional neighbors, PJM Interconnection, L.L.C. (“PJM”), ISO New England Inc. (“ISO-NE”), and Canada<sup>5</sup> through its Northeastern Independent System Operators/Regional Transmission Organizations (“ISOs/RTOs”) Planning Coordination Protocol<sup>6</sup> to conduct required studies. The studies and coordination efforts enable ISOs/RTOs and transmission planners to effectively determine needs and identify solutions, including potential changes to the total transfer capability between regions.<sup>7</sup> It is worth noting that in two instances, the interregional ties for New York are international (IESO and HQ) which would require cooperation from both the United States and Canada to implement.

The amount of total transfer capability is best determined jointly by the planning coordinators on both sides of the interregional interface under consideration. Such analysis by the planning coordinators must prudently consider the reliability and resiliency benefits along with the costs associated with the increased capability. The NYSRC takes no position on the amount of transfer capability needed or the costs of the ITCS proposed facilities. The NYSRC submits that such responsibilities fall within the bounds of the planning coordinators’ duties.

The NYSRC does include the interregional transfer capabilities that exist within its models to assess resource adequacy within the NYCA. The NYSRC currently performs that function

---

<sup>5</sup> The NYISO coordinates planning efforts with two Canadian entities; Ontario’s Independent Electricity System Operator (“IESO”) and Hydro-Quebec (“HQ”).

<sup>6</sup> The amended and restated Northeastern ISO/RTO Planning Coordination Protocol (“Northeast Protocol”) can be accessed on the NYISO’s website: [https://www.nyiso.com/documents/20142/1406358/Northeast\\_Planning\\_Protocol\\_FINAL\\_SIGNED\\_VERSION.pdf/8471488b-2e9e-5060-7c04-4168e86e69b4](https://www.nyiso.com/documents/20142/1406358/Northeast_Planning_Protocol_FINAL_SIGNED_VERSION.pdf/8471488b-2e9e-5060-7c04-4168e86e69b4). IESO and HQ participate in the Northeast Protocol on a limited basis to share data and information.

<sup>7</sup> In addition to the Northeast Protocol coordination, recent efforts between the NYISO and HQ allow for an increased transfer limit from HQ into New York under specified real-time conditions. See Chateauguay-Massena Interconnection Operation above 1,500 MW presentation available at [https://www.nyiso.com/documents/20142/42924206/05\\_Chat-Massena%20Operation%20Above%201500%20\\_FINAL.pdf/81e75242-00db-da8f-b81d-e93ecfd6f7c0](https://www.nyiso.com/documents/20142/42924206/05_Chat-Massena%20Operation%20Above%201500%20_FINAL.pdf/81e75242-00db-da8f-b81d-e93ecfd6f7c0).

through its annual forward looking Installed Reserve Margin assessment which is filed each December with the Commission.

The usefulness of any incremental transfer capability from a reliability and resiliency perspective will be a function of how much dispatchable generation is potentially available on either side of the transmission interface under consideration for improvement in its delivery capability. For the best result for all parties, generation must be available in times of system stress such as cold weather events, wind lulls, and solar lulls as it is expected that the NYCA will become winter peaking within the current planning horizon as a result of New York State climate policy mandates. Significantly, it is important to remember that while transmission can assist in transporting energy to areas where there are shortages, it is not useful without adequate generation.

### **III. Conclusion**

The NYSRC respectfully requests that the Commission consider these comments, as well as the positions set forth in the NYISO's comments, and looks forward to continuing its role to promote and preserve the reliability of New York State's Bulk Power System.

Dated: February 25, 2025  
Albany, New York

Respectfully Submitted,

*/s/ Amanda De Vito Trinsey*

Amanda De Vito Trinsey, Esq.  
COUCH WHITE, LLP  
*Counsel for the New York State  
Reliability Council, L.L.C.*  
540 Broadway, P.O. Box 22222  
Albany, New York 12201-2222  
518-426-4600  
[adevito@couchwhite.com](mailto:adevito@couchwhite.com)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Comments of the New York State Reliability Council, L.L.C. has been served upon each person 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: February 25, 2025  
Albany, New York

*/s/ Amanda De Vito Trinsey*  
Amanda De Vito Trinsey