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March 6, 2023

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Re: 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
*Consolidated Edison Company of New York, Inc. Petition Supplement to Propose an Alternative
Brooklyn Clean Energy Hub*

Dear Ms. Phillips:

The New York Offshore Wind Alliance (“NYOWA”) offers the following comments in response to the *Petition Supplement to Propose an Alternative Brooklyn Clean Energy Hub* (“Supplemental Petition”), filed by the Consolidated Edison Company of New York (“Con Edison” or “Company”) on December 13, 2022, and noticed for comment by the Public Service Commission (“Commission”) on January 4, 2023.

In its Supplemental Petition, Con Edison urges the Commission to approve cost recovery for the Brooklyn Clean Energy Hub (“BCEH”) on the additional basis that it is needed to meet reliability needs manifesting as soon as 2028; and proffers an alternative configuration of the BCEH to meet this imminent reliability need.¹ Con Edison states that, under its alternative proposal, the Company retains the flexibility to scale up the project consistent with the original BCEH design as a potential point of interconnection for offshore wind projects.² The Company further indicates that it would inform the Commission, at least one year prior to the project’s planned in-service date, “to inform the Commission whether offshore wind or potentially other clean energy project developers have expressed interest in connecting at the Hub.”³

NYOWA members recognize the paramount objective of public utility service in maintaining the reliability of the grid and support necessary utility investments to meet reliability needs. However, we take no position on whether accelerated growth in customer demand served by the Brownsville Brooklyn area substation warrants further investment in the local distribution

¹ Supplemental Petition at 1.

² Id. at 2, 7.

³ Id. at 2.

system, as asserted by Con Edison,⁴ or whether the BCEH represents a cost-effective alternative for meeting this reliability need.

Rather, our sole objective is to reiterate the point made in our filings on this matter to date; namely, to underscore the advantages of the Commission's Public Policy Transmission Needs ("PPTN") process for eliciting competitive proposals for meeting identified transmission needs that are driven by public policy objectives. Together with an identification of appropriate local distribution system upgrades and new facilities elicited pursuant to the Comprehensive Grid Planning Process, New York has the processes and tools to ensure the significant deployment of OSW generation is cost-effectively integrated into the system. The Commission, in coordination with the New York Independent System Operator, and consistent with the biennial PPTN review, should continually evaluate the availability of electrically and economically viable Points of Interconnection for future offshore wind development pursuant to the Climate Leadership and Community Protection Act mandates. The Commission should not rely exclusively on the Company's reporting of developer interest in the BCEH, but should elicit input from market participants directly. Nor, as stated above, should the Commission sole source to Con Edison the development of transmission assets to meet the CLCPA imperatives.

In the event the Commission approves the Con Edison plan on reliability grounds, the construction and outage scheduling for BCEH should nevertheless coordinate with the many renewable resources interconnecting into Con Edison and BCEH should not delay any existing schedules.

Thank you for this opportunity to offer further comment.

Sincerely,



Fred Zalcman
Director

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⁴ Id. at 3.