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January 13, 2016

VIA ELECTRONIC FILING SYSTEM AND ELECTRONIC MAIL

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12233
secretary@dps.ny.gov

Re: Case 12-T-0502 – Proceeding on Motion of the Commission to Examine Alternating Current Transmission Upgrades
Case 13-E-0488 – In the Matter of Alternating Current Transmission Upgrades – Comparative Proceeding
Case 13-T-0455 – Part A Application of NextEra Energy Transmission New York, Inc. for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII of the Public Service Law for the Marcy to Pleasant Valley Project

Dear Secretary Burgess:

As requested in ordering paragraph 11 of the New York Public Service Commission's Order Finding Transmission Needs Driven by Public Policy Requirements (issued on December 17, 2015, "PPR Order"), NextEra Energy Transmission New York, Inc. ("NEETNY") hereby withdraws the following routes from further consideration in the above-referenced proceedings:

- a) Edic to Pleasant Valley (P15);
- b) Marcy to New Scotland (P18);
- c) Marcy to Rotterdam (P16);
- d) New Scotland to Knickerbocker (P17);
- e) Greenbush to Pleasant Valley (P16, P18, P19a); and
- f) Greenbush to Knickerbocker (P17).¹

¹ For purposes of this letter, NEETNY has adopted the route nomenclature utilized in the PPR Order as opposed to that used in NEETNY's application in Case 13-T-0455.

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As requested in ordering paragraphs 12 and 13 of the Commission's PPR Order, NEETNY will propose its Marcy/Edic to New Scotland/Princetown to Rotterdam transmission solution (P17) and its Knickerbocker to Pleasant Valley transmission solution (P17, P19c – coupled with the upgrades referenced in the PPR Order) to the New York Independent System Operator ("NYISO").²

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'JK' with a stylized flourish extending to the right.

Jeffrey D. Kuhn

cc: DMM Party List for Cases 12-T-0502, 13-E-0488, 13-T-0455

² Ordering paragraph 13 of the PPR Order contains an apparent typographical error inasmuch as it requests that NEETNY propose its "*Greenbush* to Pleasant Valley (P17, P19c) transmission solution" to the NYISO. (Emphasis added.) This typographical error was first made on page 9 (paragraph 11) of the original version of the Motion of DPS Trial Staff for Commission to Declare a Public Policy Need & Take Further Action Regarding Alternating Current Transmission Proposals (filed September 22, 2015, "Motion"). However, on October 2, 2015, Trial Staff filed a list of errata in its Motion that corrected this typographical error by deleting "Greenbush" from page 9/line 15 of the Motion and inserting "Knickerbocker" in its place (highlighted copies of the relevant pages of the Motion and subsequent list of errata are attached hereto as Appendix A). Accordingly, it appears that ordering paragraph 13 of the PPR Order was intended to reference NEETNY's "Knickerbocker to Pleasant Valley" transmission solution as opposed to the "Greenbush to Pleasant Valley" transmission solution.

Appendix A

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 12-T-0502 - Proceeding on Motion of the Commission to Examine Alternating Current Transmission Upgrades.

CASE 13-E-0488 - In the Matter of Alternating Current Transmission Upgrades - Comparative Proceeding.

CASE 13-T-0454 - Application of North America Transmission Corporation and North America Transmission, LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII of the Public Service Law for an Alternating Current Transmission Upgrade Project Consisting of an Edic to Fraser 345 kV Transmission Line and a New Scotland to Leeds to Pleasant Valley 345 kV Transmission Line.

CASE 13-T-0455 - Part A Application of NextEra Energy Transmission New York, Inc. for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII of the Public Service Law for the Marcy to Pleasant Valley Project.

CASE 13-T-0456 - The Part A Application of NextEra Energy Transmission New York, Inc. for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII for the Oakdale to Fraser Project.

CASE 13-M-0457 - Application of New York Transmission Owners Pursuant to Article VII for Authority to Construct and Operate Electric Transmission Facilities in Multiple Counties in New York State.

CASE 13-T-0461 - Application of Boundless Energy NE, LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII for Leeds Path West Project.

**MOTION OF DPS TRIAL STAFF FOR
COMMISSION TO DECLARE A PUBLIC POLICY NEED & TAKE
FURTHER ACTION REGARDING
ALTERNATING CURRENT TRANSMISSION PROPOSALS**

GRAHAM JESMER
Assistant Counsel

ANDREA CERBIN
Assistant Counsel

Dated: Albany, New York
September 22, 2015

from further consideration in the proceeding (such withdrawals to be effective concurrently in Cases 12-T-0502 and 13-E-0488):

- (a) Edic to Pleasant Valley (P15);
- (b) Marcy to New Scotland (P18);
- (c) Marcy to Rotterdam (P16);
- (d) New Scotland to Knickerbocker (P17);
- (e) Greenbush to Pleasant Valley (P16, P18, P19a); and
- (f) Greenbush to Knickerbocker (P17).

10. The Commission should request NextEra to propose to the NYISO NextEra's Marcy to New Scotland; Princetown to Rotterdam (P17) transmission solution such that NextEra's costs incurred in preparing a proposed solution in response to the Commission's request will be recoverable under the NYISO tariff.

11. The Commission should request NextEra to propose to the NYISO NextEra's **Greenbush** to Pleasant Valley (P17, P19c) transmission solution, coupled with the necessary add-on Rock Tavern Substation terminal upgrades and Shoemaker to Sugarloaf transmission line upgrades, such that NextEra's costs incurred in preparing a proposed solution in response to the Commission's request will be recoverable under the NYISO tariff.

12. In Case 13-T-0461, the applicant, Boundless Energy NE, LLC (Boundless), should be requested by the Commission to withdraw the entire application for all its project segments from further consideration in the proceeding (such withdrawals to be effective concurrently in Cases 12-T-0502 and 13-E-0488) such that after the withdrawal Case 13-T-0461 should be closed. The project segments to be withdrawn include:

- (a) Hurley Avenue to Leeds (Reconductor) (P20, P21);
- (b) Leeds to Pleasant Valley (Reconductor) (P20);
- (c) CPV Tap to Rock Tavern (Reconductor) (P20, P21); and
- (d) Roseton to East Fishkill (Underground) (P20, P21).

ERRATA in TRIAL STAFF FINAL REPORT AND MOTION

Motion of DPS Trail Staff for Commission to Declare a Public Policy Need and Take Further Action Regarding Alternating Current Transmission Proposals:

P. 9, line 15, delete "Greenbush"; insert "Knickerbocker" in its place.

Appendix, P. 2, update the schematic diagram to include the words "or Marcy" below the word "Edic" in Segment A; add the Greenbush Substation with the words "Substation Upgrades" above it. (Attached hereto as Errata Appendix 1)

Comparative Evaluation of Alternating Current Transmission Upgrade Alternatives New York State Department of Public Service Trial Staff Final Report:

P. xi, line 7 change "capacity" to "capability"

P. xii, 2nd para., change "Upstate New York/Southeast New York (UPNY/SENY)" to "UPNY/SENY"

P. xv, Figure 1-P16 has a MEDIUM rank (in the Interim Report, it had a HIGH rank)

P. xvi, 1st line, change "The New York System Operator (NYISO)" to "The NYISO"

P. xvi, line 11, change "above" to "in Trail Staff's Interim Report"

P. xvi, last line, change "East after" to "East interfaces after"

P. xviii, 2nd line, change "applicants" to "Applicants"

P. xviii, line 10, delete "Chester-".

P. xviii, line 11, at the end of the line add the following sentence: "Other upgrades at the Roseton Substation (stuck breaker mitigation) would be necessary for scenarios 20 and 21."

P. xix, 5th line, change "SENY" to "Southeastern New York (SENY)" or "Southeastern New York (SENY comprising the Lower Hudson Valley, New York City, and Long Island)"