

## Con Edison Response to NYISO's Con Edison Wheel Cancellation Modeling Assumptions

Con Edison's position is that the post wheel topology should be represented by the physical capability of each line (A/B/C, J/K, 5018) with the overall PJM-SENY interface limiting the flow into southeast NY. Con Edison has agreed that the topology NYISO has currently adopted for the RNA can be used for the 2017-18 IRM study in the interest of time constraints, a lack of clear operating protocols and the minimal impact on results, with the understanding that the topology will be revisited for the 2018-19 IRM study when there is more clarity regarding the operation of the PAR controlled lines.

In response to NYISO post wheel modelling assumptions Con Edison voices the following concerns:

- Power flow analysis was conducted to determine a natural distribution of power over the A/B/C, J/K and 5018 lines based on network impedance as the starting point to integrate the PAR controlled lines into the PJM proxy bus for normal daily interchange scheduling while minimizing the number of tap changes on the PARs. The assumption that operators would assume this "hands off" approach, ignoring the full capability of the ties during the transfer of emergency assistance is not reasonable. The distribution factors were meant to be applied to the full PJM-NYCA interface transfer capability established in the NYISO Operating Study, not to an artificial 1,000MW of historically observed Emergency Assistance (EA) level from PJM to NYCA.
- The ICS is currently studying the appropriate amount of EA that NYCA should receive. The EA White Paper should be expanded to study the appropriate level of EA into southeast NY (SENY). The topology should adopt the findings from the EA White Paper instead of deferring to the historical level of assistance from PJM to NYCA.
- Con Edison recognizes that there may be local issues in northern NJ that can potentially limit the J/K lines ability to send power to NY however the NYISO has not provided any detail or analysis regarding this limitation.
- Con Edison is not aware of a limitation or any study that suggests a limitation on imports over the A/B/C lines due to increased flow from zone G to zone J.
- Con Edison is not aware of a limitation or any study that suggests that PJM cannot support emergency assistance into NY for more than 1,000MW, the historically observed level of EA.
- The A line and VFT should not be separated because Staten Island (SI) generation (Linden Cogen, AK 2/3) remains bottled depending on the flow on the A line. SI un-bottling Phase II, which would have eliminated the bottling issue in a steady state power flow analysis, was deemed unnecessary and therefore cancelled after the PJM Wheel termination. Going forward the assumption for the flow on the A-line is 0 MW in the steady state power flow analysis; and with that assumption the SI generation is not bottled. However, as the A line capability is about 600 MW and capable of transferring emergency support the existing nomograms are more than still relevant.