



March 25, 2024

Mr. Thomas Berkman, General Counsel
New York State Department of Environmental Conservation 625 Broadway
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Subject: DEC Application IDs: 3-1326-00211/00001 (Dover Compressor Station); 4-1922-00049/00004 (Athens Compressor Station)

INTRODUCTION

The New York State Reliability Council (NYSRC) is a non-profit entity established by the Federal Energy Regulatory Commission (FERC) in 1998 at the time of the reorganization of the electricity industry in New York State and the formation of the New York Independent System Operator (NYISO) and the competitive wholesale electricity markets, to ensure that state, regional, and federal reliability criteria would be maintained in the newly formed competitive markets. The NYSRC's primary function is the establishment of the Reliability Rules that must be complied with by the NYISO and all market participants in the operation of the state's bulk-power electricity system.

NYSRC COMMENTS

The NYSRC appreciates the opportunity to submit these comments related to the Department of Public Service ("DPS") letter dated February 26, 2024, to the New York State Department of Environmental Conservation ("DEC") in support of the subject project.

Although the focus of the NYSRC is on the reliability of the high-voltage electric system in New York, the reliability of the gas system in the State is also a focus for the NYSRC because it is of paramount importance to the reliability of the electric system. Consciousness on this gas-electric relationship was critically raised during Winter Storm Elliott where the possibility of large-scale outages of the gas system in New York City was narrowly averted by Consolidated Edison's use of its own liquefied natural gas (LNG)¹. As the DPS letter states, "Winter Storm Elliott resulted in electric generators withdrawing more

¹ A copy of this FERC, NERC, and Regional Entity staff report "Inquiry into Bulk-Power System Operation During December 2022 Winter Storm Elliott" is appended to this letter.

gas from the interstate gas system than available under contract, resulting in less available gas supply for customers of Con Edison and National Grid.” This situation came close to a gas system shut down. National Grid was similarly impacted as Con Edison and nearly had to shut off gas service to approximately 30,000 customers to protect the overall system on one of the coldest days of the year.

Not only would customers have been facing the unavailability of the gas system, but also the potential concurrent curtailment of their electric supply if New York did not have generators with dual fuel capability to switch to. In fact, New York was able to export power to PJM and Hydro Quebec helping avert a wide regional system emergency. The details of the NYISO challenging operating conditions can be found in the March 29, 2023, Operating Report to the NYISO Management Committee².

Although in the long-term New York’s environmental policies and legislation will reduce the use and reliance on natural gas, the transition years immediately ahead are expected to continue to show increases in the use of natural gas, albeit the growth is likely at a lower incremental rate than in the past.

The subject project would in effect expand the capability of the northern interstate gas system and thus lower the potential for a shutdown when the capacity of the southern interstate pipeline systems is reached, thus also affecting the electric system.

CONCLUSION

For these reasons, the NYSRC respectfully submits these supportive comments on the DPS’s timely letter. Any comments or questions should be addressed to the NYSRC Secretary, Herb Schrayshuen at herb@poweradvisorsllc.com.

Sincerely,

Christopher Wentlent
Chair, New York State Reliability Council

² The NYISO Operating Report Cold Weather Operations dated March 29, 2023 may be found at this [link](#).
