NPCC, Inc.

DOE 2009 Congestion Study Workshop
Hartford, CT
July 9, 2008

The Northeast Power Coordinating Council, Inc. ("NPCC") appreciates this opportunity to offer the following comments prior to the start of the 2009 DOE Congestion Study.

NPCC

NPCC is a New York State not-for-profit membership corporation. The purpose of NPCC is to promote and enhance the reliable and efficient operation of the international, interconnected bulk power system in Northeastern North America through:

(i) the development of regional reliability standards, and compliance assessment and enforcement of the continent-wide and regional reliability standards, coordination of system planning, design and operations, and assessment of reliability, and

(ii) the establishment of regionally-specific criteria, and the monitoring and enforcement of compliance with such criteria.

NPCC has over 40 years of experience in an international, coordinated approach to maintaing reliability in Northeastern North America. NPCC's website is www.npcc.org .

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Geographically, NPCC U.S. includes the six New England states and the state of New York. NPCC Canada includes the provinces of New Brunswick, Nova Scotia, Ontario and Québec. In total, NPCC covers nearly 1.2 million square miles, and is populated by more than 55 million people. From a net energy for load perspective, NPCC is approximately 45% U.S. and 55% Canadian. With regard to Canada, approximately 70% of Canadian load is within the NPCC Region.

Summary

DOE has stated that the 2009 Congestion Study will focus "chiefly on the analysis of recent or current electric transmission congestion." The addition of new transmission and generation capacity over the past several years along with the growth of demand response programs (that reduce peak demand) have clearly strengthened the ability of New York and New England to reliably meet electricity demands.

The installation of a second 345 kV line between Maine and New Brunswick this past winter, last summer's New Jersey to Long Island HVDC cable addition, along with the completion of other transmission upgrades in New England have strengthened the overall reliability of the NPCC system.

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Over the past several years, southwestern Connecticut has faced reliability problems due to transmission constraints into and within that geographic area. The combined effect of the increased transmission capacity placed in-service, along with the significant amount of demand response programs added in southwest Connecticut have gone a long way towards mitigating these concerns.

A number of transmission upgrades are in service or expected to be in-place this summer to enhance reliability within NPCC. Transmission upgrades completed last year, for example, have increased the capacity to import electricity into the Boston area by approximately 1,000 MW, alleviating previous reliability concerns.

NPCC would like to emphasize that the DOE 2009 congestion analysis consider the northeast as a whole, not only modeling those transmission, demand response, and generating resource projects in the United States, but also those corresponding projects in the neighboring Canadian systems.

Coordinated analysis is necessary to properly assess the operation and impact that future reinforcement of NPCC's (and it's neighboring Region's) transmission system, demand response programs, and generating resources will have on congestion.

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In addition to understanding the respective Market Rules in the Region, proper modeling of the operation of the NPCC system also requires an in-depth understanding of the applicable:

- **NERC Reliability Standards (see: https://standards.nerc.net/)**
- **NPCC Criteria (see: http://www.npcc.org/documents/regStandards/Criteria.aspx) and**
- **the New York State Reliability Council ("NYSRC") Reliability Rules(see: http://www.nysrc.org/)**

NERC's Reliability Standards set the reliability requirements for planning and operating the North American bulk power system.

NPCC's Criteria further define more stringent, regionally specific reliability requirements.

The NYSRC's mission is to promote and preserve the reliability of electric service on the New York State Power System through their Reliability Rules, which shall be complied with by the New York Independent System Operator and all entities engaging in electric transmission, ancillary services, energy and power transactions on the New York State Power System.

NPCC recommends that the DOE review the latest information available through the following regional reliability assessments and

northeast reliability planning initiatives prior to the start of their 2009 Congestion Study:

- **The NPCC Seasonal Reliability assessments (see: http://www.npcc.org/documents/reports/Seasonal.aspx)**
- **The New England Regional System Plan (see: http://www.iso-ne.com/trans/rsp/index.html)**
- **The New York Comprehensive Reliability Planning Process (see: http://www.nyiso.com/public/services/planning/crpp.jsp)**
- **The Inter-Area Planning Stakeholder Advisory Committee (see: http://www.interiso.com/default.cfm**
- **The Ontario Reliability Outlooks (see: http://www.ieso.ca/imoweb/pubs/marketReports/18MonthOutlook_2008jun.pdf and http://www.ieso.ca/imoweb/pubs/marketReports/ORO_Report-2007-2-2.pdf**

NPCC thanks the DOE for their invitation to participate in today's workshop, and looks forward to working with the DOE during the course of the 2009 Congestion Study.