



*Statement of Intent*

Submitted to the New York Public Service Commission in Response to the  
**Proceeding on Motion to Examine Alternating Current Transmission Upgrades**

**Order Instituting Proceeding**

Issued November 30, 2012

**Case 12-T-0502**



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## EXECUTIVE SUMMARY

This Statement of Intent is submitted by Cricket Valley Energy Center LLC ("Cricket Valley" or "CVE") to the New York Public Service Commission ("PSC" or "Commission") in response to the

### **Proceeding on Motion to Examine Alternating Current Transmission Upgrades, Order Instituting Proceeding, issued November 30, 2012 in Case 12-T-0502 (the "Proceeding").**

Cricket Valley proposes to construct a new fourteen and 1/2 (14.5) mile 345 kV transmission line parallel to Consolidated Edison Company's ("ConEd") existing Line 398, 345 kV transmission line ("Line 398") on the existing ConEd right of way (the "Project"). The Project will begin at the proposed Cricket Valley substation in Dover, NY and terminate at the existing ConEd Pleasant Valley substation in Pleasant Valley, NY.

The Project's new 345kV line will connect Cricket Valley's proposed combined cycle, natural gas powered 1,080 megawatt (MW) electric generating facility ("the Generation Facility") to the NYISO administered grid at the ConEd Pleasant Valley substation. NYISO has determined that this new line is a System Upgrade Facility ("SUF") required pursuant to NYISO's tariff and, accordingly, ConEd will be required to construct or have constructed the new line on the existing ConEd right of way. The proposed Generation Facility would be located in Dover, Dutchess County, New York.

The Project is located in NYISO Zone G, to the south of and below the UPNY/SENY transmission interface, an area that has been determined by NYISO and the Commission to have significant electric transmission constraints the alleviation of which is the subject of this Proceeding.

The Project will be constructed either by CVE or ConEd and ownership thereafter will be transferred to ConEd which will maintain the Project. The Generation Facility will be constructed, owned and operated by CVE.

CVE is owned by subsidiaries of Advanced Power AG, General Electric Company and Marubeni Corporation.

The Project together with the Generation Facility will substantially contribute to achieving the PSC's goals in this Proceeding for reducing congestion, increasing grid reliability and achieving rate payer benefits for the following reasons:

- Relieves the congestion below the Leeds to Pleasant Valley transmission constraint and creates ratepayer savings;
- The NYISO CARIS Study recommended new generation at the Pleasant Valley substation (below the L-PV constraint) which would reduce ratepayer paid energy production costs by **\$330 million**;
- The NYISO New Capacity Zone Study and NYISO 2012 Reliability Needs Assessment both recommended alleviation of congestion below this corridor;

- Utilizes an existing utility right of way;
- Strengthens NYISO grid into ISO-NE and Long Island Power Authority (“LIPA”) service territories;
- Will be online by 2016;
- Does not anticipate ratepayer support for the Project or the Generation Facility at this time;
- Enhances grid reliability; and
- Provides environmental benefits/reduced emissions in region.

The Project expects to begin construction in 2014 and expects commercial operational in 2016, provided that the Commission grants the Project an expedited Article VII authorization to construct the Project in accordance with the outcome of this Proceeding.

## **I. RESPONDENT INFORMATION**

The Project will be a NYISO required System Upgrade Facility and will be constructed either by CVE or ConEd pursuant to contractual arrangements to be negotiated under the NYISO tariffs. After construction is completed ownership of the Project will be transferred to ConEd which would maintain the line. The Generation Facility will be constructed, owned and operated by CVE.

Cricket Valley is a New York limited liability company and is an affiliate of Advanced Power AG (“AP”), an energy development company headquartered in Zug, Switzerland, with offices in London. AP’s North American operations are managed by its Advanced Power Services (NA) Inc. subsidiary, located in Boston, Massachusetts.

AP’s management has considerable experience with power generation facilities and has developed more than 9,400 MW of power generation projects in the U.S. and worldwide.

AP has entered into a Joint Development Agreement with a subsidiary of General Electric Company (“GE”) for the development of the CVE Project.

GE will supply its latest 7FA Series 5 gas turbine technology, highly efficient steam turbines as well as generators to the Generation Facility; the steam turbines and generators would be manufactured in Schenectady, NY.

GE has major operations in New York’s Capital Region and is one of the world’s leading suppliers of power generation and energy delivery technologies. GE has installed its turbine technology at thousands of locations throughout the U.S. and around the world. GE is also one of the world’s largest providers of power plant operations and maintenance services, managing more than 22,000 MW of power generation assets.

GE is a publicly traded company with a market capitalization of approximately \$200 billion USD.

Marubeni Corporation (Marubeni) owns a minority interest in the CVE Project. Marubeni has a similar strong power generation background, with ownership in more than 29,000 MW of power generation

facilities. Marubeni has constructed or supplied over 93,000 MW in various fuel and technology types. Marubeni Corporation manages its North American electricity sector investments through its subsidiary Marubeni Power International, Inc., based in New York, NY. Marubeni Corporation is a publicly traded company which has a market capitalization of approximately \$11 billion USD.

The collective experience and expertise of AP and its international industrial partners ensures that the Project will be developed, built and operated to the highest possible standards of the power industry.

## **II. PROJECT DESCRIPTION**

The Project is a 14.5 mile 345 KV transmission that would line parallel ConEd's existing Line 398 and would connect the proposed Generation Facility's substation (the "CVE Substation") to the existing ConEd Pleasant Valley Substation. The new line parallel to Line 398 would be constructed in the existing ConEd Line 398 right of way.

The Project is a System Upgrade Facility required by NYISO and will be constructed by CVE or by ConEd pursuant to contractual arrangements to be negotiated under the NYISO tariffs. After construction ownership of the Project will be transferred to ConEd which would maintain the line. The Generation Facility will be constructed, owned and operated by CVE.

The CVE Substation will be located in Dover, NY, approximately 14 miles east of the ConEd Pleasant Valley Substation and 3 miles west of the NY-Connecticut border. Electrically, the Project is located in NYISO Zone G, south of the congested Leeds-Pleasant Valley transmission corridor. As a result, the Project will provide additional flexibility for the NYISO to maintain reliability and proper voltage in the lower Hudson Valley (NYISO Zone G). The Project's transmission capability will be nominally 1000MW of capacity and energy.

The Project expects to begin construction in 2014 and anticipates operation in 2016, provided that the Commission grants the Project an expedited Article VII authorization to construct the Project in accordance with the outcome of this Proceeding.

The Generation Facility will consist of three (3) fast starting/load following natural gas fired, combined-cycle electric generating units. Each unit will be capable of dispatching independently to the NYISO grid, with a combined rated capacity of nominally 1,080 MW. The complete facility will be state-of-the-art and one of the most efficient, flexible, and environmental-friendly generating facility in New York. The proposed Generation Facility would be located in Dover, Dutchess County, New York.

See the Project and Generation Facility location map attached as Exhibit A.

## **III. Project's Compatibility with the Goals and Benefits of the PSC's Order**

The goals of the PSC Proceeding in case 12-T-502 are (i) relieving transmission congestion in the

UPNY/SENY corridor, (ii) enhancing the transmission system's reliability, flexibility and efficiency and mitigation of reliability problems that may arise with expected generator retirements, (iii) obtaining ratepayer benefits, which include improving system flexibility and efficiency, reducing environmental and health impacts, increasing diversity in supply, as well as long-term benefits in terms of job growth, development of efficient new generating resources at lower cost in upstate areas, and mitigation of reliability problems that may arise with expected generator retirements.<sup>1</sup> These are also congruent with goals of the State's Energy Highway Blueprint.

CVE's Project will substantially contribute to achieving the above cited PSC's goals for the reasons explained herein:

1. Project Location below transmission constraints; Location recommended by NYISO CARIS Study; Production cost savings of \$330 million:

The Project (i.e. the new 14.5 mile 345 kV transmission line from the new CVE Substation to the ConEd Pleasant Valley substation,) which connects the CVE 1080 MW Generation Facility to the NYISO grid, will be located below the congested UPNY/SENY transmission interface. The Project will provide 1080MW of power to NYISO Zone G and the New York City where the power is needed more quickly, efficiently, with less environmental impact and at a lower cost than construction of potentially hundreds of miles of transmission lines that may have multiple permitting uncertainties.

NYISO's "Congestion Assessment and Relief Integration Study" (CARIS) (March, 2012) specifically identified the addition of 1,000MW of generation *at the Pleasant Valley substation*- the exact substation at which the Project will connect the Generation Facility- as a solution to reduce congestion in New York State in the Leeds-Pleasant Valley transmission corridor. NYISO estimates that placement of a 1000MW generation facility adjacent to the Pleasant Valley substation would produce an estimated ten-year electricity production cost savings of **\$330 million** (present value):

The generation solution [for the Leeds-Pleasant Valley congestion] is projected to reduce congestion across NYCA for the planning horizon. The ten-year production cost savings of \$330 million (present value) are due to the uncongested location and the assumed better heat rate of the generic generating unit compared to the average system heat rate. Efficient generator solutions reduce imports from neighbors and enable a more efficient and lower cost NYCA generation market. Savings accrue in lower production cost as well as reduced congestion.<sup>2</sup>

Thus the NYISO CARIS study directly affirms the benefits of constructing the Project and the Generation Station at this location (i.e. near the Pleasant Valley substation) on the NYSIO grid.

Moreover, the recently issued NYSIO "New Capacity Zone Report" (January 2013) also states that there are transmission constraints on the UPNY/SENY transmission interface which is constraining 849.2 MW of generation from moving from Zones A through F to Zones G through I, thus indicating the need for a new capacity zone for Zones G- I.<sup>3</sup>

The Project and associated Generation Facility are therefore perfectly located to alleviate the transmission congestion along the UPNY/SENY transmission corridor specifically identified by the NYISO 2013 New Capacity Zone Report.

Finally, the NYISO 2012 “Reliability Needs Assessment” (September, 2012) further confirms transmission congestion above the Leeds-Pleasant Valley corridor and describes transmission system overload over the UPNY/SENY interface in case of retirements of certain generators.<sup>4</sup> The Reliability Needs Assessment report goes on to state that:

The Reliability Needs for resource adequacy in 2020 through 2022 can be satisfied through the addition of compensatory MWs in Zones G through K below the transmission constraint on the UPNY/SENY interface.<sup>5</sup>

The NYISO 2012 Reliability Needs Assessment thus further confirms that there are transmission constraints below the Leeds-Pleasant Valley transmission corridor. The Project and the Generation Facility, being below this constraint and located in Zone G can relieve this congestion at a lower net overall cost to ratepayers given the \$330 million electricity production cost savings predicted by the NYISO CARIS Study.

2. Project Online by 2016:

The Project can deliver the power below the transmission constraints at an earlier date than the alternative of construction of hundred miles of new transmission lines and taking of new right of ways that would be required to bring the equivalent amount of power from Canada or upstate New York to downstate New York which CVE believes will consume more time and be more costly to the ratepayers. The Project would only be 14 miles long and would be built within the existing ConEd right of way currently used for Line 398. There is suitable space within the existing right of way for the Project’s parallel transmission line no eminent domain land takings are anticipated. The Project could commence construction in 2014 and be online by 2016 if the PSC granted the Project an Article VII approval in a timely manner.

3. Project requires no ratepayer funding:

As of this date it is planned that the Project and Generation Facility will be privately financed and will not require direct rate-payer supported funding, unlike other transmission projects which have been proposed in the Energy Highway Blueprint. The Project and Generation Facility will therefore expose ratepayers to significantly reduced risk of cost-overruns, etc. CVE and its owners will invest over \$1 billion in privately financed capital to construct the Project and the Generation Facility.

After the Project is constructed the new line will be transferred to ConEd. However, Cricket Valley would supply the permitting and construction funding for the Project and would not receive any ratepayer

paid subsidy during that period. Moreover, if the Generation Facility were to receive any contract, awarded in a fair auction conducted by, for example, the State of New York public authority or by a New York investor owned utility company in the form of off-take agreements, then there would be some ratepayer funding, but the amounts would have to be determined if and when those agreements are awarded.

4. Project strengthens NY-NE import transfer capability and transmission grid reliability into ISO-NE and LIPA:

The Project will add a new line and state of the art protection/communication scheme parallel to the existing Line 398 from the ConEd Pleasant Valley (PV) substation to the Northeast Utilities Long Mountain (LM) substation in New Milford, Connecticut. This additional parallel line will strengthen the PV to LM connection of the NYISO grid to the ISO NE grid, providing greater reliability of transmission for imports to, and exports from, ISO-NE. This new line will also strengthen transmission capacity into the LIPA territory which has recently been heavily stressed by the hurricane Sandy. The new line will also help alleviate the reliability risk any failures on the degraded 183 shunts on the existing ConEd 398 feeder line.

The Project and Generation Facility are located well away from the Atlantic coast and will strengthen this section of the grid's ability to withstand the effects of any future hurricanes or major coastal flooding events. The Project thus adds additional geographical diversity of power generation for a more reliable grid in case the LIPA area of the grid and its associated generation should be lost or damaged in the future by major storm events. The Project and Generation Facility can supply grid back-up to supply electricity into NYSIO Zones J and K.

5. Project and Generation Facility reduce regional emissions, support increased use of renewables and enhance grid reliability:

The Project with the associated Generation Facility will provide environmental benefits by reducing regional air emissions and greenhouse gas emissions. The CVE "Security Constrained Economic Dispatch Analysis" (SCED), provided to the PSC as part of CVE's Petition filed under Public Service Law Section 68 for the Generation Facility's Certificate of Public Convenience and Necessity ("Section 68 Petition"), projects decreased NO<sub>x</sub> emissions in New York State by an average of 2.05% per year, decreased SO<sub>2</sub> emissions by an average of 1.53% per year, and a decrease of total CO<sub>2</sub> emissions by an average of 0.1% per year.<sup>6</sup>

Since the Project is only 14 miles long on an existing right of way currently used for ConEd's Line 398, it will likely cause substantially less environmental impact than the alternative construction of hundreds of miles of new transmission lines on new rights of way in undisturbed territory. Also, the line losses over hundreds of miles of new transmission lines will be significant, causing lost generation. The associated emissions from this lost generation mean that there will ultimately be more emissions per MW

generated transmitted over the hundreds of miles of new transmission lines than from the Project and the Generation Facility.

The Project and Generation Facility's quick ramping-up capabilities can support the intermittent generation of solar and wind powered facilities because its power can be quickly dispatched to where it is needed on the NYISO grid when the renewable energy facilities cannot generate power (because of lack of wind or solar resource.) Therefore, the Project and its associated Generation Facility can enable increased use of renewable resources by providing the needed backup capacity i.e., insurance, to maintain grid reliability.

The Generation Facility, which will utilize state-of-the-art combined cycle technologies will be among the most efficient energy generators in the State. According to the Security Constrained Economic Dispatch Analysis submitted to the Commission, the Generation Facility will be dispatched by NYISO ahead of less efficient higher emitting generators, causing those units to operate less frequently, thereby yielding net air quality benefits and production cost savings across the region, as noted above.<sup>7</sup>

Finally, NYISO's "2012 Power Trends Report" recognizes that the adoption of regulatory mandates by Federal and State governments designed to reduce CO<sub>2</sub>, NO<sub>x</sub> and SO<sub>2</sub> emissions will likely force the early retirement of older, inefficient electric generating plants representing *more than half* the installed generating capacity in New York State. This could result in unplanned plant retirements that would impact grid reliability.<sup>8</sup> By connecting the Generation Facility to the grid, the Project can serve as a replacement resource for the retirement of oil and coal burning facilities caused by the imposition of strict new environmental regulations, or by the retirement of any other generation facility. Due to the Generation Facility's superior low heat rate, it will be dispatched by NYISO ahead of older and less efficient generators, causing those units to operate less frequently eventually forcing these facilities to retire due to high heat rates and low capacity factors.

#### **IV. Project In-Service Date and Project Development Schedule**

The Project will need an Article VII approval from the Commission to build the new 345 kV transmission line. Estimated time to undertake engineering and environmental studies needed for the preparation of the Project's Article VII application is approximately six months. Estimated time for approval by the Commission of the Project's Article VII Petition is an additional eighteen months. Total elapsed time is twenty-four months to complete the Article VII approval process.

The need for a new line paralleling the existing Line 398 arose out of the NYISO 2011 Class Year studies for interconnection of the Generation Facility to the NYISO administered grid. NYSIO has determined that Cricket Valley must construct the new line (the Project) as a System Upgrade Facility (SUF) in order to permit the Generation Facility to interconnect with the NYISO grid without causing any reliability or stability problems. The final technical requirements of the Project will be defined by NYSIO and by ConEd, which is the interconnecting transmission owner and also owns the right of way for the existing



Line 398. It is expected that the final technical requirements for the new line which constitutes the Project will not be issued until ConEd and NYISO complete the final Class Year 2011 SUF studies, expected to be completed in March 2013.

It is anticipated that ConEd will be filing the Article VII application for the Project with the Commission because (i) ConEd will be required to construct the Project's new line as an SUF under the NYISO Tariff, (ii) the Project's new line is expected to be on ConEd's existing right of way for Line 398 and (iii) ownership of the Project will be given to ConEd upon completion of construction of the Project. Cricket Valley would reimburse ConEd as necessary for its costs incurred in the Article VII proceeding. Cricket Valley is currently in the process of engaging the engineering and environmental team to do the preliminary work necessary for a Project Article VII filing with the Commission. Cricket Valley initiated the preliminary work for the Project's Article VII application to the PSC in December, 2013.

The Project expects to begin construction in 2014 and is anticipated to be operational in 2016, together with the Generation Facility, provided that the Commission grants the Project an Article VII approval in a timely manner in accordance with the outcome of this Proceeding.

NYDEC issued its SEQRA Findings Statement for the Generation Facility on September, 26, 2012, certifying the completion of the DEC's DEIS/FEIS SEQRA process. The Generation Facility's Air and wetlands permits were issued to the Generation Facility by the NYDEC on September 27, 2012. The Town of Dover has already issued the Generation Facility a variance from the Zoning Ordinance and CVE expects that the Town of Dover will also grant a Special Use Permit to the Generation Facility in January, 2013. Finally, the Generation Project's Section 68 Petition for a Certificate of Public Convenience and Necessity is expected to be issued in the first quarter of 2013.

An EPC contractor for the Generation Facility has been selected and primary terms of construction have been agreed upon.

The Generation Facility therefor has been issued almost all the permits needed for construction and is expected to be construction ready in the first quarter of 2013.

#### **V. General Financial Structure; No Need for PSC or FERC Issued Rates; Economic benefits.**

As of this date it is anticipated that the Project and the Generation Facility will be privately funded and no direct rate-payer support will be requested from the Commission or from FERC. There will be no rate-payer exposure to cost over-runs. The fact that Cricket Valley is not requesting financial support from ratepayers for the Project or for the Generation Facility is a tremendous benefit for the ratepayers and the public, while at the same time injecting over \$1 billion in privately funded investment into the New York state economy.

After the Project is constructed the new line will be transferred to ConEd. However, Cricket Valley would

supply the permitting and construction funding for the Project and would not receive any direct ratepayer subsidy. As noted above, if the Generation Facility were to receive any contract, awarded in an auction conducted by, for example, a State of New York public authority or by a New York investor owned utility company in the form of off-take agreements, then there would be some ratepayer funding, but the amounts would have to be determined if and when those agreements are awarded.

Moreover, the Project and the Generation Facility will generate substantial tax revenue to the benefit of the Dover School District, the Town of Dover and Dutchess County. They will also create an estimated 750 construction jobs, 28 high paying permanent jobs. Dutchess County will gain \$224.3 million in economic benefits during construction and \$22 million in annual secondary economic benefits.<sup>9</sup>

#### **V. NYISO Interconnection Study Status of the Project.**

The Generation Facility has NYISO Queue #310 and is participating in the NYISO Large Facility Interconnection Process for interconnection to the NYISO administered electrical transmission grid. A Feasibility Study and System Reliability Impact Study have been completed by NYISO and Cricket Valley is part of NYISO Class Year 2011. NYSIO and ConEd are currently studying the configuration and cost of the SUFs needed to interconnect the Generation Facility to the NYSIO grid. An assessment of “deliverability” of the Generation Facility’s Project’s 1,080 MW of capacity resource will also be part of the Class Year 2011 study which will result in the specification of “System Deliverability Upgrades” to ensure the Generation Facility’s capacity is deliverable throughout the NYISO system.

As noted above, NYISO has determined, based on the preliminary 2011 Class Year Studies, that a new line paralleling the existing Line 398 will be need as a transmission SUF. This new transmission line is the origination of the Project. It is expected that the final 2011 Class Year studies finalizing the SUFs that must be constructed by Cricket Valley and the technical requirements for the new line which constitutes the Project will be issued after ConEd and NYISO complete the 2011 Class Year studies, expected in March 2013.

Thus the Generation Facility has nearly completed the NYISO interconnection process and the final technical requirements of SUFs needed to be constructed by CVE will be issued in the expected mid-March completion of the 2011 Class Year. At that time, CVE expects that, as a result of negotiated agreements with ConEd pursuant to NYISO tariffs, that Cricket Valley and ConEd will collaborate to complete the preliminary engineering and environmental studies needed for a complete Article VII application to be submitted to the Commission for the Project.

#### **VI. Project Utilization of Existing Rights of Way**

As noted above, the Project expects to use the existing right of way for the ConEd Line 398 connecting from the Pleasant Valley substation to the Northeast Utilities Long Mountain Substation in New Milford, Connecticut. Definitive arrangements for use of the ConEd right of way for the Project will be finalized

after the completion of the NYISO 2011 Class Year studies, including the requirement to build the new line parallel to Line 398 i.e. the Project described herein.

See the Project and Generation Facility location map attached as Exhibit A which shows the existing ConEd Line 398 right of way.

## **VII. Preliminary Cost Estimates for the Project**

Based on solicitations from reputable contractors with high voltage transmission and distribution (T&D) experience, the total Project cost is estimated with the range of \$41.3 million to \$53.7 million. The following are the major cost items attributing to the total estimate:

- Transmission Line (Design, Construct, Commission): \$35MM to \$45.5MM
- Project Permitting and Development: \$3.7MM to \$4.7MM
- Soft Costs (Construction Interest, Bonding, Finance Cost): \$2.6MM to \$3.5MM

## **CONCLUSIONS**

The Project and associated Generation Facility can meet or exceed all of the goals and objectives of the PSC's proceeding, including:

- Alleviation of transmission congestion because of:
  - Project location below the Leeds – Pleasant Valley transmission constraint;
  - Generation location at the Pleasant Valley substation recommended by NYSIO CARIS Study;
  - NYISO CARIS study estimate of production cost savings of \$330 million;
  - NYISO 2013 New Capacity Zone study and NYISO 2012 Reliability Needs Assessment recommending relief of transmission congestion in Zone G below the Leeds Pleasant Valley corridor.
- Online by 2016;
- Anticipated no Project ratepayer funding needed;
- Project strengthens transmission grid into ISO-NE and LIPA territories;
- Project and associated Generation Facility produces environmental benefits and reduced emissions;
- Project enhances grid reliability;
- Project and associated Generation Facility supports use of renewables;
- Project and associated Generation Facility produces efficient energy production;
- Replacement source for anticipated plant retirements;
- Location away from coast;
- Project uses existing utility right of way;
- Generation Facility will have all its state and local permits by March 2013 and will be

construction ready at that time;

- Project is a required NYISO SUF and has nearly completed the NYISO Class Year 2011 study and interconnection process;
- Project and Generation Facility produce substantial tax revenues for the Town of Dover and will create an estimated 750 construction jobs, 28 high paying permanent jobs with Dutchess County economic benefits of \$224.3 million during construction and \$22 million annually.

The Project expects to begin construction in 2014 and plans to be operational in 2016, together with the CVE Generation Facility, provided that the Commission grants the Project an Article VII approval in a timely manner in accordance with the outcome of this Proceeding.

Cricket Valley respectfully requests that the Commission review Cricket Valley's Statement of Intent and consider granting Cricket Valley Cricket Valley an expedited Article VII approval in accordance with the procedures, requirements and outcome of this Proceeding.

Respectfully submitted:

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## Endnotes

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<sup>1</sup> See Order Instituting Proceeding, Case 12-T-502, at pages 2-3.

<sup>2</sup> See NYISO *2011 Congestion Assessment and Resource Integration Study* (CARIS), at page 54, available at: [http://www.nyiso.com/public/webdocs/services/planning/Caris\\_Report\\_Final/2011\\_CARIS\\_Final\\_Report\\_3-20-12.pdf](http://www.nyiso.com/public/webdocs/services/planning/Caris_Report_Final/2011_CARIS_Final_Report_3-20-12.pdf)

<sup>3</sup> NYISO, *2013 New Capacity Zone Study Report*, January 13, 2013, at Page 12, available at [http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_icapwg/meeting\\_materials/2013-01-14/NCZ%20Study%20Report\\_ICAPWG\\_1-14-13\\_revised\\_clean2%20\\_2\\_.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2013-01-14/NCZ%20Study%20Report_ICAPWG_1-14-13_revised_clean2%20_2_.pdf)

<sup>4</sup> NYISO, *2012 Reliability Needs Assessment*, September 18, 2012 at pages 42, available at [http://www.nyiso.com/public/webdocs/markets\\_operations/services/planning/Planning\\_Studies/Reliability\\_Planning\\_Studies/Reliability\\_Assessment\\_Documents/2012\\_RNA\\_Final\\_Report\\_9-18-12\\_PDF.pdf](http://www.nyiso.com/public/webdocs/markets_operations/services/planning/Planning_Studies/Reliability_Planning_Studies/Reliability_Assessment_Documents/2012_RNA_Final_Report_9-18-12_PDF.pdf)

<sup>5</sup> Ibid, pages 7 and 57.

<sup>6</sup> See *Security Constrained Economic Dispatch (SCED) Analysis*, Pages 6-7, Tables 3.3, 3.4 and 3.5.

<sup>7</sup> Ibid.

<sup>8</sup> See NYISO *Power Trends 2012: State of the Grid*, at pg. 32, available at:

[http://www.nyiso.com/public/webdocs/newsroom/power\\_trends/power\\_trends\\_2012\\_final.pdf](http://www.nyiso.com/public/webdocs/newsroom/power_trends/power_trends_2012_final.pdf)

<sup>9</sup> See, Cricket Valley Energy Center LLC, Draft Environmental Impact Statement (April, 2011), submitted to the NYDEC at Section 6.7.3, pages 6-107 through 6-123, available at:

[http://www.cricketvalley.com/Libraries/Draft\\_Environmental\\_Impact\\_Statement\\_DEIS/CVE\\_DEIS\\_Section\\_6\\_-\\_Community\\_Resources.pdf](http://www.cricketvalley.com/Libraries/Draft_Environmental_Impact_Statement_DEIS/CVE_DEIS_Section_6_-_Community_Resources.pdf)