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VIA ELECTRONIC FILING

Honorable Michelle Phillips, Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case No. 20-E-0197 - Proceeding on Motion of the
Commission to Implement Transmission Planning Pursuant to
the Accelerated Renewable Energy Growth and Community
Benefit Act

Petition Requesting Designation of Certain Transmission
Investments as a Priority Transmission Project

Dear Secretary Phillips:

We are writing in support of the New York Power Authority's ("NYPA") petition requesting designation of the Clean Path Transmission Project as a Priority Transmission Project ("Project").

RPA is an independent non-profit civic organization that develops and promotes ideas to improve the economic health, environmental resiliency, and quality of life of the New York metropolitan area. RPA conducts research on the environment, land use, and good governance, and advises cities, communities, and public agencies.

The Accelerated Renewable Energy Growth and Community Benefit Act ("Act") correctly recognized NYPA's unique role in developing the bulk transmission system in New York. NYPA is a trusted Authority with the expertise and access to capital to deliver beneficial outcomes to the State in a cost-effective manner. The Act also correctly recognizes that status quo timelines associated with planning and developing the bulk transmission system may sometimes conflict with the timelines required to achieve climate goals of the Climate Leadership and Community Protection Act ("CLCPA"). The Clean Path Transmission Project is a clear example of a project that exemplifies the spirit of the Act and should not take a backseat to transmission planning processes which may take years to unfold.

Continuing to develop this important Project, which would provide a transmission path for largely emissions-free power to flow into New York City beginning in 2029, will not only help our state reduce its reliance on fossil fuels but also enhance the overall resilience of our transmissions systems, add capacity to the downstate grid and lower ratepayer cost exposure.

Specifically, the Project is an HVDC link offering unique capacity attributes relative to AC transmission that would enhance the reliability of the downstate network and enable large scale decarbonization of Zone J by providing 1,300 MW of year-round firm capacity to New York City. This is critical as NYISO is projecting thinning reliability margins starting in 2031. In addition, because the project is capable of bi-directional operation, it can also enhance the upstate grid in times of excess supply downstate from resources like offshore wind.

The Project's capacity value is essential to enabling planned retirements of various fossil assets on schedule, including those that are subject to DEC's NOx Peaker Rule and NYPA's Small Clean Power Plants by 2030. Sunsetting these fossil assets, which are often located in historically disadvantaged communities, and replacing their output with emissions-free power would constitute a huge environmental victory for communities on the frontlines of climate change—communities that we know do not always have the same opportunity to make their voices heard.

In recognition of DEC's recent decision with an endorsement from DPS to expand natural gas supply into NYC to maintain system reliability, the urgency to deliver clean renewable energy into NYC is critical to protect public health and advance emissions reductions as mandated in the CLCPA.

According to NYPA's petition, the Project will result in over 78 million tons of CO2 emissions avoided on a statewide basis in 2030, increasing to 4,765 million tons avoided in 2035, with a reduction of approximately 0.1 million tons of NOx emissions in 2030, increasing to .11 million tons in 2035. Collectively, these emissions reductions will provide significant air quality benefits to all New Yorkers.

Beyond the clean air and associated health benefits, we also urge the Commission to consider the broader benefits of the project to our economy and communities: the creation of thousands of good-paying jobs in communities between the Western Catskills and New York City; production cost savings, reduced congestion, REC and ZEC cost savings and reductions in downstate capacity prices that represent a net present value of over \$6 billion; and direct savings to New York Ratepayers. The Clean Path Transmission Project clearly aligns our State's electric system needs, economic benefits, and policy objectives mandated under the CLCPA at a critical inflection point in our history. In addition, the Project builds on the work already performed by NYPA under NYSERDA's Tier 4 Program, which means it can be completed much quicker than any newly proposed transmission project you might consider. It is for all these reasons that we strongly support the petition's approval.

With increased risk and uncertainty facing the clean energy industry, we must seize this opportunity to enhance grid reliability, shore up our economy, improve public health, address climate risks, and advance New York's clean energy future.

Respectfully,

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

Robert Freudenberg

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