

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

APPLICATION OF NORTH AMERICA TRANSMISSION, LLC
AND NORTH AMERICA TRANSMISSION CORPORATION FOR
A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY
AND PUBLIC NEED PURSUANT TO ARTICLE VII OF THE
PUBLIC SERVICE LAW FOR AN ALTERNATING CURRENT
TRANSMISSION UPGRADE PROJECT CONSISTING OF AN
EDIC TO FRASER 345 kV TRANSMISSION LINE AND A NEW
SCOTLAND TO LEEDS TO PLEASANT VALLEY 345 kV
TRANSMISSION LINE

Case No.13-T-0454

PROCEEDING ON MOTION TO EXAMINE
ALTERNATING CURRENT TRANSMISSION UPGRADES

Case No. 12-T-0502

ALTERNATING CURRENT TRANSMISSION
UPGRADES COMPARATIVE PROCEEDING

Case No. 13-E-0488

**AMENDED INITIAL APPLICATION OF NORTH AMERICA TRANSMISSION,
LLC AND NORTH AMERICA TRANSMISSION CORPORATION FOR A
CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED
PURSUANT TO ARTICLE VII OF THE PUBLIC SERVICE LAW FOR AN
ALTERNATING CURRENT TRANSMISSION UPGRADE PROJECT
CONSISTING OF AN EDIC TO FRASER 345 kV TRANSMISSION LINE AND A
NEW SCOTLAND TO LEEDS TO PLEASANT VALLEY 345 kV TRANSMISSION
LINE**

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1. MATTER OF THE AMENDED PART A APPLICATION

In compliance with the New York State Public Service Commission (the “Commission”) Order Establishing Modified Procedures for Comparative Evaluation Issued and Effective December 16, 2014, “December 16 Order” as modified by the December 30, 2014 letter granting extension of certain filing requirements, North America Transmission, LLC and North America Transmission Corporation (collectively “North America”) is pleased to submit the information requested in Appendix D of the December 16 Order.

The information submitted herein amends and refines the Project proposed in North America’s September 30, 2013, Part A Application in these proceedings under Article VII of the Public Service Law of the State of New York and the implementing regulations of the Commission (16 NYCRR Parts 85, 86, and 88). Following the guidance of the Commission, and in an attempt to be responsive to the extensive public feedback received to date, North America has modified the Project proposal in an effort to minimize the acquisition of additional lands for rights-of-way and minimize the construction of major electrical transmission facilities that are out of scale or character with existing facilities already in the landscape.¹ This submittal provides all the information requested in Appendix D of the December 16 Order as modified by the December 30, 2014 letter granting extension of certain filing requirements,² the detailed cost estimate information and the information from pages 6 through 10 of Appendix D of the December 16 Order will be submitted by March 2, 2015.

North America is confident that Trial Staff and the Commission will find that this proposal best meets the objectives of this proceeding as summarized in Table 1-1 below.

TABLE 1-1. COMPARISON OF NORTH AMERICA’S PROPOSAL TO COMMISSION’S CRITERIA

Criteria	Edic-Fraser	NS-L-PV Adjacent to Existing 345 kV	NS-L-PV I- 87 ROW	NS-K-PV 115 kV ROW	Series Compensation, Other Improvements
Contribution to Transfer Capability	All elements contribute to portfolios that provide well over 1,000 MW of additional N-1-1 surplus in SE New York				
Cost to Ratepayers	North America provides complete, credible cost estimates, is willing to accept the Commission’s cost containment provisions, and proposes additional cost containment provisions of its own				

¹ December 16 Order at 39.

² Letter from the Commission to All Parties, *Re: Cases 12-T-0502, 13-E-0488, 13-T-0454, 13-T-0455, 13-T-0456, 13-M-0457 and 13-T-0461*, AC Transmission Proceedings, December 30, 2014.

Criteria	Edic-Fraser	NS-L-PV Adjacent to Existing 345 kV	NS-L-PV I-87 ROW	NS-K-PV 115 kV ROW	Series Compensation, Other Improvements
Electric System Impacts, etc.	All elements contribute to portfolios that provide for more efficient dispatch, reduced system losses, lower product costs, and reduced emissions				
Extent of Additional ROW	Parallel to existing transmission line over 90%, only 80' ROW,	Parallel to existing transmission line over 85%, only 80' ROW	In existing railroad, I-87 ROW over 76%	In existing railroad, 115 kV ROW 99%	In existing ROW
Innovative Technology	High speed internet to area. Series compensation. Narrow ROW	Narrow ROW	Use of existing highway ROW	Innovative structure. Reliability for local area.	Series compensation
Environmental Compatibility, Visual Impacts	In character with existing landscape	In character with existing landscape	Use of existing ROW	No higher than existing transmission lines	In character with existing landscape

In addition, North America’s submittal is fully compliant with the December 16 Order, and even goes further in benefits to ratepayers. North America accepts the risk mitigation and cost containment measures set forth in the December 16 Order and even proposed additional risk mitigation enhancements. North America has provided all inclusive cost estimates. North America’s proposal does not negatively impact existing reliability in the area.

As with North America’s original Part A Application, North America’s proposal continues to consist of the following primary components:

- New 345 kV overhead transmission line from Edic to Fraser with series compensation
- New 345 kV overhead transmission line from New Scotland³ to Leeds to Pleasant Valley

³ As an additional option, if approved by the Commission, the proposed route could originate at Knickerbocker instead of New Scotland Substation.

However, the basic proposal for each of these lines is modified in a manner which reduces the right-of-way requirement for each component. In addition, in response to the guidance set forth in the Order Authorizing Modification of the Process to Allow for Consideration of Alternative Proposals issued and effective February 21, 2014, and elsewhere in this proceeding, North America has identified two alternative routes for New Scotland to Leeds to Pleasant Valley which are located predominately within existing rights-of-way. Alternative 1 is a route which is largely in the existing I-87 highway right-of-way. Alternative 2 is a route which is almost entirely in an existing 115 kV transmission line right-of-way. As with North America's original submittal, both of these alternatives may begin at either the existing New Scotland substation or the proposed Knickerbocker substation location. If a facility is built at the Knickerbocker location, it could be built either as a 345 kV-only "Switchyard", which only serves to tie together the 345 kV lines in the area, or there may be benefits to build the facility as a 345 kV/115 kV "Substation", which includes connections to the 115 kV lines in the area and transformation from 345 kV to 115 kV. Therefore North America proposes the following alternatives:

- New Scotland to Leeds to Pleasant Valley Alternative 1 – I-87 Right-of-Way;
 - Alternately Knickerbocker Switchyard to Pleasant Valley I-87 Right-of-Way;
 - Alternately Knickerbocker Substation to Pleasant Valley I-87 Right-of-Way;
- New Scotland to Leeds to Pleasant Valley Alternative 2 – 115 kV Right-of-Way
 - Alternately Knickerbocker Switchyard to Pleasant Valley – 115 kV Right-of-Way
 - Alternately Knickerbocker Substation to Pleasant Valley – 115 kV Right-of-Way

In addition, the Commission has invited the integration of innovative technologies to enhance transfer capability, and North America has identified several components that improve the transfer capability of the Project without the need for any additional lands for rights-of-way:

- The addition of series compensation on the existing Fraser-Gilboa 345 kV circuit
- Looping the existing Marcy-Coopers Corner 345 kV circuit to the existing Fraser substation;
- The addition of series compensation on the existing Marcy-New Scotland 345 kV circuit;
- The addition of series compensation on the existing Edic-New Scotland 345 kV circuit.

In the interest of defining an optimum portfolio of project components that provides the most benefit at the least cost to ratepayers, North America identified five portfolios in our

amended Part A information filing of January 7, 2015, and suggested that NYISO study each of them to evaluate the benefits on transfer capacity that would result. The proposed portfolios are shown in Table 1-2 below.

TABLE 1-2. PROPOSED PORTFOLIOS FOR EVALUATION BY NYISO

Project Component	Portfolio 1	Portfolio 2	Portfolio 3	Portfolio 4	Portfolio 5
Edic-Fraser (with series compensation)	X	X	X	X	X
New Scotland-Leeds-Pleasant Valley	X		X		
New Scotland-Leeds-Pleasant Valley Alternative 1 – I-87 ROW		X			
Knickerbocker Switchyard-Pleasant Valley Alternative 1 – I-87 ROW					
Knickerbocker Substation-Pleasant Valley Alternative 1 – I-87 ROW					
New Scotland-Pleasant Valley Alternative 2 – 115 kV ROW				X	
Knickerbocker Substation-Pleasant Valley Alternative 2 – 115 kV ROW					
Knickerbocker Switchyard-Pleasant Valley Alternative 2 – 115 kV ROW					X
Series compensation on Fraser-Gilboa 345 kV circuit			X	X	X
Loop existing Marcy-Coopers Corner 345 kV to Fraser substation;			X	X	X
Series compensation on Marcy-New Scotland 345 kV circuit;				X	
Series compensation on the Edic-New Scotland 345 kV circuit.				X	
Edic-Princeton-Knickerbocker (as proposed by others)					X

North America is willing to construct, own, and operate any combination of the proposed Project components that may be selected by the Commission. Similarly, North America is willing to construct, own, and operate variations of our proposed Project components to incorporate slight changes of our proposal that are necessary or beneficial to achieve the goals of the Energy Highway initiative upon order by the Commission. Such variations could include such concepts as changing the amount or location of series compensation, the points of interconnection, or the ratings of the lines. North America is also willing to construct the proposed lines as double circuit capable to allow future expansion of the system with minimal additional landowner and environmental impacts upon Commission order.⁵

⁵Constructing a portion of the project as double-circuit capable would reduce future permitting and right-of-way, but require additional right-of-way initially.

1.1 PROJECT OVERVIEW

North America Transmission, LLC and North America Transmission Corporation are members of the LS Power group of companies (“LS Power”). LS Power is an experienced developer of large-scale energy projects, including several transmission projects. Since 1990, LS Power has had the technical and engineering capability to develop, own and/or operate over 32,000 megawatts (“MW”) of power generation facilities and two large extra high-voltage (345 kV and 500 kV) transmission projects totaling over 700 circuit-miles. Since its inception, LS Power has raised over \$29 billion of debt and equity for investment into its projects and portfolio of subsidiary companies, including over \$900 million for the construction of the two large-scale overhead transmission line projects completed in 2013. Detailed information regarding North America’s experience and capabilities with respect to permitting, financing, constructing, owning, and operating is provided in our Part A filing of January 7, 2015.

North America’s design for the proposed Project includes multiple 345 kiloVolt (“kV”) AC transmission components, which together are expected to provide at least 1,000 megawatts (“MW”) of congestion relief between the upstate and downstate areas, thus meeting the goal of the AC transmission upgrade initiative set forth in the New York Energy Highway Blueprint (the “Blueprint”). Complete amended Initial (Part A) Application details for the proposed Project components are included in Sections 2 and 3 below.

The 1,000 MW of congestion relief between the upstate and downstate areas will be achieved by the combined effects of North America’s proposed Project components. North America’s suggested combinations of components are specified in the portfolios listed in Table 1-2 above.

APPLICANT:
NORTH AMERICA TRANSMISSION, LLC
NORTH AMERICA TRANSMISSION CORPORATION

EXHIBIT 1
GENERAL INFORMATION REGARDING APPLICATION (§ 86.2)

EXHIBIT 1: GENERAL INFORMATION REGARDING APPLICATION (§ 86.2)

This subsection provides the general information regarding this amended Part A Application as required in Title 16 of the New York Codes, Rules and Regulations (NYCRR) § 86.2.

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INCORPORATION STATUS UNDER THE TRANSPORTATION CORPORATIONS LAW

The Applicant, North America Transmission Corporation, is incorporated under the Transportation Corporations Law, and the Certificate of Incorporation was filed with the New York Department of State.