

# Con Edison Transmission, Inc.

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PJM Pre-Qualification Package

Renewal of Designated Entity Status

August 30, 2024

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## **1. Name and address of the entity and point of contact**

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## **2. Technical and engineering qualifications of the entity or its affiliate, partner, or parent company**

Con Edison Transmission, Inc. ("CET") has been a PJM Interconnection Pre-Qualified Designated Entity since 2021.

CET, a subsidiary of Consolidated Edison, Inc. ("CEI"), was formed in 2016 and is a leading transmission development company and owner of electric and gas transmission assets. Its mission is to deliver transmission solutions that enable the transition to a clean energy future. CET's electric transmission solutions deliver cost-effective and reliable clean energy to demand centers, which are expandable to meet future growth. CET's electric investment portfolio includes the largest ownership interest in New York Transco LLC ("NY Transco") and numerous ongoing development projects in New Jersey, New York, New England, and offshore. CET's gas investment portfolio also includes a minority investment in Mountain Valley Pipeline ("MVP") and Honeoye Storage Corporation ("HSC").

NY Transco is a partnership of the four New York state investor-owned utilities, and its mission is to plan, develop, and own new high-voltage electric transmission projects in New York State to reduce power flow congestion, facilitate the growth of renewable generation sources, and provide continued grid reliability. NY Transco currently has over 115 miles of high-voltage transmission in-service, with FERC-approved rates. In 2023, NY Transco and NY Power Authority partnered and were selected to build Propel NY Energy, a 90+ mile high voltage transmission project that will bolster reliability and resiliency and create pathways to deliver clean energy into the New York grid. NY Transco also recently proposed the Energy Link NY project as part of the New York Independent System Operator's 2024 offshore wind Public Policy Transmission Need competitive solicitation. If selected, this solution will deliver offshore wind energy into NYC.

In New Jersey, CET participated in the state's first State Agreement Approach ("SAA") solicitation in 2021, proposing Clean Link New Jersey. This project included

an underground power corridor design and offered interconnections to the Larrabee, Smithburg, and Deans substations. The project also included designs for an independently owned offshore mesh network. The power corridor design proposed by CET allowed for multiple high-voltage direct current (“HVDC”) export cables to utilize the same strategic right-of-way (“ROW”) and landfall location to deliver offshore wind (“OSW”) generation to the PJM grid, while both maximizing capacity transfer and minimizing disruption to the shore communities hosting the infrastructure. CET has been active in New England for several years developing transmission solutions to connect renewable energy sources to the existing grid.

CET’s gas portfolio includes two investments. MVP is a 303-mile pipeline located in West Virginia and Virginia. MVP was placed into service in June 2024. The project operator is continuing restoration of the right of way and estimates a total project cost of approximately \$7.9 billion (excluding allowance for funds used during construction (AFUDC)). CET’s interest in MVP, the company that developed the project, is expected to be approximately 6.7%. In addition, CET is a majority owner of HSC, a 6.7 billion cubic foot natural gas storage field located in Ontario County, New York that provides contracted storage services to major northeast utilities.

CET has been able to utilize the skills and experience of its staff gained, in part, from prior experience at Consolidated Edison Company of New York, Inc. (“CECONY”) and Orange and Rockland Utilities, Inc. (“O&R”), including O&R’s subsidiary, Rockland Electric Company (“RECO”). In addition, experts from CECONY and O&R are available, to support project development, consistent with New York State and New Jersey Affiliate Rules.

**3. Demonstrated experience of the entity or its affiliate, partner, or parent company to develop, construct, maintain, and operate transmission facilities. Including a list or other evidence of transmission facilities previously developed regarding construction, maintenance, or operation of transmission facilities both inside and outside of the PJM region**

As described above in Section 2.0, CET is a subsidiary of CEI, which has considerable experience siting, designing, constructing, operating, and maintaining transmission systems across numerous states and transmission systems managed by Independent System Operators and Regional Transmission Organizations (“ISO/RTOs”). CEI’s subsidiaries, CET, CECONY, O&R, and RECO, have been active developing projects in PJM, NYISO, MISO, ISO-NE, and others.

Such experience is also demonstrated through CET’s investment in NY Transco. NY Transco’s assets include three projects in-service since June 2016, two projects in-service since 2023, one project under construction, and one project in-development.

In June 2016, New York Transco energized three new projects: Ramapo to Rock Tavern 345 kV Line, Frasers-Coopers Corner 345 kV Line, and Staten Island Unbottling. These transmission upgrades contribute to reliability and reduce upstate to downstate transmission congestion, which saves money for electric customers.

In 2023, NY Transco completed construction of the New York Energy Solution and its related project, Rock Tavern to Sugarloaf. Dover Station, which is also under this project portfolio, is under construction and expected to be completed by mid-2025. Through these projects, the New York Energy Solution design relieves grid congestion and brings more renewable energy from upstate to downstate New York, while maximizing use of existing ROWs, and reducing the number of transmission towers by replacing them with a new tower design that stakeholders agree is a visual improvement. New York Energy Solution upgraded approximately 55 miles of existing utility infrastructure, permanently eliminating approximately 230 existing transmission structures, and installing new monopole structures. The Rock Tavern to Sugarloaf project replaced aging infrastructure with modern structures along a 12-mile ROW, relieving grid congestion. These two projects were completed six months ahead of schedule and went into service mid-2023.

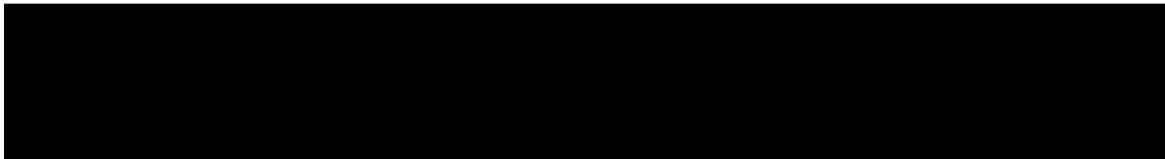
In 2023, NY Transco, in partnership with NY Power Authority, was awarded the Propel NY Energy project. The project is approximately \$3.2 billion of investment in critical infrastructure that will serve New York State residents and businesses now and into the future. Propel NY Energy project was selected as the winner of an New York Independent System Operator competitive solicitation to improve the transmission grid on Long Island to support offshore wind injection in New York. It will result in approximately 90 miles of new underground and subsea 115 kV and 345 kV transmission lines within the New York metro area, five new 345 kV substations, and three upgraded 345kV substations. The project is expected to be in-service in 2030.

In 2024, NY Transco proposed Energy Link NY to the New York Independent System Operator as part of their NYC offshore wind Public Policy Transmission Need competitive solicitation. If selected, this solution will deliver offshore wind energy into New York City. Energy Link NY includes new, strategically located submarine and underground transmission lines and associated equipment connected to clean energy hubs throughout the region.

CET's gas portfolio includes two investments, HSC and MVP. MVP is a 303-mile pipeline which was placed in-service in June 2024. CET is also a majority owner of

HSC, a 6.7 billion cubic foot natural gas storage field located in Ontario County, New York that provides contracted storage services to major northeast utilities.

In addition to CET's electric and gas portfolio, its utility affiliates, CECONY and O&R, have extensive experience developing, constructing, maintaining, and operating transmission facilities. The following is a list of recent projects in development and completed by CECONY and O&R, including RECO:



- Reliable Clean Cities Project – Staten Island feeder replacements (in-service 2024)
- Reliable Clean Cities Project - Rainey and Corona Substation upgrades and two new 138 kV feeders (in-service 2019 and 2023)
- Ramapo bank 1300 replacement – 525 MVA transformer (in-service 2020)
- Installation of UG Cable 69 kV Line 47 (in-service 2020)
- Harings Area 69kV Loop – 69 kV underground transmission in NJ (in-service 2020)
- Rainey to Corona 1 (36187) PAR controlled 138kV feeder (in-service 2019)
- Ramapo bank 2300 replacement - 525 MVA transformer (in-service 2019)

#### **4. Previous record of the entity or its affiliate, partner, or parent company to adhere to standardized construction, maintenance, and operating practices**

CET is managed by experienced utility professionals who adhere to standardized utility best practices for construction, maintenance, and operating practices. For new transmission projects, CET works closely with engineering, procurement, and construction firms ("EPCs") to provide services such as project management, project controls, engineering, construction management, procurement, permitting, and stakeholder relations. The EPCs CET works with are experienced firms with proven track records and experience working on large projects in the Northeast and throughout the country. All projects are designed in accordance with all applicable industry standards and in conformance with utility design practices and applicable law. CET also engages third-party consultants to assist with permitting and regulatory compliance, as appropriate. CET's staff has significant experience managing projects that employ multiple vendors, contractors, and consultants.

CET will be responsible for the operations and maintenance ("O&M") of any project facilities. CET will be responsible for developing the operating and maintenance

plans and managing the resource providing the O&M services, which may be through CET employees, employees of its affiliates on behalf of CET consistent with affiliate rules or contracted services. CET, together with PJM, will be responsible for meeting North American Electric Reliability Corporation (“NERC”) requirements.

**5. Capability of the entity or its affiliate, partner, or parent company to adhere to standardized construction, maintenance, and operating practices**

CET and its affiliates have a long history of adhering to standardized construction, maintenance, and operating practices, as described in Section 4.0. The companies’ staff and hired consultants are well versed with standardized practices and incorporate these into development, design construction, maintenance, and operations activities. In addition to complying to industry standards, CET and its affiliates comply with ISO/RTO, NERC, NPCC, NYSRC, FERC, and State Commission requirements and will continue to in the future for all development projects.

**6. Financial statements of the entity or its affiliate, partner, or parent company. Please provide the most recent fiscal quarter, as well as the most recent three fiscal years, or the period of existence of the entity, if shorter, or such other evidence demonstrating an entity’s current and expected financial capability acceptable to the Office of the Interconnection**

CET’s financial information is represented in its parent company’s, CEI, annual reports.

- [2024: 10-Q Report, for the Quarterly period ended June 30, 2024](#)
- [2023 Annual Report](#)
- [2022 Annual Report](#)
- [2021 Annual Report](#)

CET has no history of bankruptcy or dissolution in the last five years. The credit rating of CEI is Baa1 / P-2 (Moody’s), A- (S&P), and BBB+ (Fitch).

**7. Commitment by the entity to execute the Consolidated Transmission Owners Agreement, if the entity becomes a Designated Entity**

Con Edison Transmission, Inc. commits to executing, or causing its subsidiary to execute, the Consolidated Transmission Owners Agreement if it becomes a Designated Entity in the PJM Region.

## **8. Evidence demonstrating the ability of the entity to address and timely remedy failure of facilities**

CET is capable of and prepared to address all future emergencies and failure of facilities. An appropriate response to failures requires a variety of solutions depending on the circumstances of the situation at hand. CET manages restoration and response at the project level.

Some examples of implemented and in-place practices/procedures at CET's investments include, but are not limited to:

- Employees, contractors, and suppliers are responsive on a 24-7/365-day-a-year basis and are ready to address all system emergencies that occur
- On-call personnel procedures
- Emergency Response and Incident Management Plans
- Training on damage assessment
- Inventory of critical spare equipment
- Engagement with industry associations

Additionally, to proactively protect against failure of facilities, CET's affiliates perform routine inspection and maintenance of facilities on an ongoing basis. System damage can be caused by vehicles, storms, vandalism, or material failure. To increase resiliency of their assets and protect against these damages, CET's affiliates have invested in storm hardening upgrades, 24/7 security and surveillance, and advanced vegetation management programs. CET's projects in PJM would follow the same best industry practices.

CET's affiliates have successfully responded to transmission system emergencies on numerous occasions ranging from miscellaneous hardware replacements to full structure replacements to multiple structure and circuit replacements. Timely remedy of facility failures is a critical activity, and CET's affiliates address these failures with three guiding principles in mind: safety, operational excellence, and the customer experience.

## **9. Description of the experience of the entity in acquiring rights-of-way**

CET and its affiliates have substantial experience acquiring rights-of-way ("ROW") and aims to minimize environmental and community impacts as much as practicable and pursues the use of existing ROWs whenever possible. In the engineering and development phase of projects, CET works alongside stakeholder engagement teams to analyze project alternatives, route determinations, impacts of environmental and non-environmental permitting on the proposed alternatives, key



outreach objectives, constructability, community impacts, and cost impacts for each alternative route in order to determine the optimal project and route.

For example, Section 3.0 notes that one of CET's investments, NY Transco, developed and currently operates over 115 miles of facilities in New York State using existing electric transmission rights-of way or adjacent utility-owned land. This includes the verification of new or existing ROW, research, negotiations, notifications, and acquisition of ROW.

As stated in Section 2.0, in the last ten decades, CET's affiliates have acquired, developed, operated, and maintained approximately 130,000 miles of electric transmission and distribution ROW, as well as approximately 4,500 miles of gas ROW.