

**From:** Erin P. Hogan [<mailto:eph@nyserda.ny.gov>]  
**Sent:** Thursday, July 11, 2013 2:57 PM  
**To:** Buechler, John  
**Subject:** Comments on EIPC Gas-Electric Interface Study SOW

John,

The following are my thoughts on the EIPC Gas Electric SOW.

1. I suggest you add a requirement that the consultant within 2-weeks of execution of the contract will submit a work plan detailing data to be collected; roles and responsibilities of the consultant, subconsultants, and PPAs, and detailed study approach/methods and schedule. I suspect some of this information will be included in the proposal, but this project requires a lot of data, under lying assumptions, and coordination. Making sure the contractor has thought through all the details may minimize delaying the project or changing the scope. Alternatively, you could add a statement somewhere early in the SOW that the contractor proposal shall include enough detail of their proposed study approach and analytical methods including preliminary data sources to demonstrate the ability to complete the project within budget and the specified schedule.
2. On the electric side, we default to PPA system plans that will capture changes in transmission and generation mix for the five and 10-year planning horizon. The interstate natural gas pipelines doesn't have anything comparable but LDCs probably do. There are numerous pipelines/upgrades proposed, but not all will be built. Who and how will it be decided on what pipelines will be built? This will be one of the most critical assumptions for the study and should be thought out carefully. Section 5.2 calls for the baseline system, but within the planning horizon there may be new pipelines. Some expansion should be considered, otherwise the results would be excessively conservative. I did not see where this issue was explicitly called out in the SOW. This type of information could be flushed out in a work plan or the SOW could be expanded requesting the consultant submits this type of information in the proposal.
3. How will Quebec be modeled in the study? I know electrically it's easy to characterize because of the DC ties, but I don't think it's that simple on the gas side. I believe Empire and Iroquois have plans to become bi-directional, if they are not already. Empire will help Ontario and Iroquois will help Quebec and may complicate the analysis for upstate flows and Long Island, particularly in the winter since Canada is a winter peaking system. I am not sure of the New England connections but suspect they could be impacted as well. Again, a work plan should clarify these types of issues.

On a related topic, I would suggest that under section 5.2 that the contractor should specify the direction its gas flows. Historically, gas pipelines were unidirectional, but some are becoming bi-directional (i.e., flowing in two directions simultaneously or reversing its flow). This information will be important to understand in the future.

Please let me know if you have any questions.

Erin

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