Appendix L: Con Edison Correspondence

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David Gmach
Director
New York City Public Affairs

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Aron Kirsch
Vice President for Planning and Construction
Hudson Yards Development Corporation
225 West 34th Street, Suite 1402
New York, NY 10122

Dear Mr. Kirsch:

I write to you to provide comments on the proposed actions involving the Western Rail Yards ("WRY") in Manhattan and the Draft Environmental Impact Statement ("DEIS"). The Metropolitan Transportation Authority ("MTA") and the New York City Planning Commission ("CPC") are serving as co-lead agencies for the environmental review of the proposed action that would result in development on the western portion of the MTA-Long Island Rail Road ("LIRR") John D. Caemmerer Yard in Manhattan. The WRY is bounded by Eleventh and Twelfth Avenues, West 30th and West 33rd Streets.

These comments are intended to provide information to the MTA and CPC to assist in the preparation of the energy portion of the DEIS. They are not intended to be Con Edison's comments on the DEIS, which will be forthcoming upon release of the document.

Con Edison previously submitted information and comments on the Hudson Yards Rezoning and Development Plan DGEIS and prepared the Energy Infrastructure Master Plan ("EIMP") for Hudson Yards and lower Manhattan. These documents relied on information provided by the MTA and City agencies for existing conditions and assumptions regarding future development plans. The planned infrastructure needs and electric demand growth presented by Con Edison reflected the development plans provided by these agencies.

Con Edison has reviewed the draft energy chapter of the DEIS for the WRY. Con Edison has not performed a separate analysis of the Build/No Build scenarios in the DEIS. However, based on the projected demand associated with this project, which is approximately 40 MWs at full development, Con Edison does not anticipate any changes in its infrastructure needs. The City's overall development and energy consumption, and more specifically, the development of the Hudson Yards area as a whole, will be the determining factors in future infrastructure needs for the area.

The EIMP indicated that although preliminary schedules for new facilities had been identified, the actual installations may need to be accelerated or possibly deferred, as dictated by the actual pace of development, actual demand growth, the use of demand side management, or other changes. In prior documents, Con Edison presented that a new West Side transmission switching station will be required by 2012 and a new West Side area substation will be required by 2013. Con Edison's current forecast projects that a new transmission switching station will be needed by 2020 to serve, among other parts of Manhattan, the Hudson Yards area, and a new area substation to serve the Hudson Yards area will be needed by 2021. The forecast revision from the original plans is due to the change in development plans and schedules, the change in overall economic conditions, increased reliance on demand side management, and changes in the electric distribution system serving Manhattan. This is the Company's current forecast, which may be subject to further revisions as conditions change and will be updated on a regular basis. Based on the information provided to Con Edison by the MTA and CPC, the need and schedule for constructing new facilities will not be altered based on the alternative scenarios referenced in the DEIS.

I hope this information is helpful. Please feel free to contact me if you need any further information.

Sincerely,

David Gmach