

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Application of Sunrise Wind LLC for a Certificate of Environmental Compatibility and Public Need for the Construction of Up to 6.2 Miles (320 kilovolt [kV]) of Direct Current (DC) Submarine Export Cable from the New York State Territorial Waters Boundary to the Smith Point County Park on Fire Island in the Town of Brookhaven in Suffolk County and Up to 17.5 Miles (320 kV) of Onshore Transmission Cable from the Landfall at Fire Island to a New Onshore Converter Station in the Town of Brookhaven and Up to 1 Mile (138 kV) of Alternating Current (AC) Onshore Interconnection Cable Connecting to the Existing Holbrook Substation in the Town of Brookhaven in Suffolk County

Case 20-T-0617
Deficiency No. 16

**SUNRISE WIND LLC's
RESPONSE TO DEFICIENCY NOTICE**

Deficiency No. 16

16 NYCRR §86.8(b)(2) requires for requests of waivers of any local ordinances, laws, resolutions, regulations, standards, and other requirements applicable to the proposed facility "grounded in factors of costs or economics (likely involving economic modeling), that the costs to consumers associated with applying the local legal provision outweigh the benefits of applying such provision." Several waiver requests for Town of Brookhaven code cite to "compliance with this local requirement is technically impossible or impracticable from a cost and economics perspective." No analysis of costs is presented for support of such waivers. For each such waiver request, please provide the required analysis demonstrating that costs to consumers associated with applying the Town of Brookhaven code outweighs the benefits of applying the provision.

Sunrise Wind's Response:

See Revised Exhibit 7, which satisfies the regulatory requirements found in 16 NYCRR § 86.8. Note that no analysis of costs to support the original waiver requests to the Town of Brookhaven Code (the Code) has been provided in Revised Exhibit 7 because all requests for waivers of the Code on the basis of cost and economics have been removed from the revised exhibit. All waivers requested to the Code in Revised Exhibit 7 are based on existing technology and the needs of consumers.