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Thinh Nguyen April 10, 2023

Sr. Manager, Interconnection Projects

NYISO

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Dear Mr. Nguyen,

The Alliance for Clean Energy New York (ACE NY) thanks the NYISO and is pleased that the NYISO is including a deep look at a queue window approach as part of its 2023 Interconnection Queue Reform project. While the ultimate advisability of moving to such an approach will depend on the results of this year’s analysis, ACE NY believes that the approach is sufficiently promising to warrant the devotion of significant NYISO and stakeholder resources to it. Below, is ACE NY’s response to the NYISO’s request for questions about the queue window approach straw proposal that was put forth at the April 3, 2023 Transmission Planning Advisory Subcommittee (TPAS) meeting. ACE NY’s questions reference specific slides from the NYISO’s April 3, 2023 TPAS presentation, which is found using [this link](https://www.nyiso.com/documents/20142/36836640/09_Queue%20Reform%20TPAS%20Slides_040322_TPAS_draft.pdf/cc1c5223-34e8-1479-333f-67cf9ee90020).

ACE NY 1 - Slide 11 discusses a “study deposit” for Phase 1, then states that actual study costs are to be paid on a monthly basis. Please clarify. Are the actual study costs that are to paid on a monthly basis separate and in addition to the study deposit?

ACE NY 2 – What is the proposed dollar amount of the study deposit for Phase 1? What will the NYISO and stakeholders use as a basis for deciding the proper amount? The same questions need to be answered for the Phase 2 deposit.

ACE NY 3 – Slide 15. Will projects that “accept and move forward to Phase 2” be returned 100% of the study deposit that they put up at the start of Phase 1? (It is understood that they also must simultaneously post a $/MW cash deposit for entering Phase 2).

ACE NY 4 – Slide 18. At the end of Phase 2, for projects that accept their cost allocations and post security for their SUFs/SDUs, will they be returned 100% of their Phase 2 study deposit? By what mechanism will the NYISO recover Phase 2 study costs from participants?

ACE NY 5 – Slide 11. A conceptual breaker-level one-line diagram is required. Is this limited to a breaker-level one line diagram terminating at a generic POI representation? If so, this is fine. If the request is for a breaker-level one line diagram of the NYISO transmission system, the developer’s engineers cannot accomplish this due to a lack of access to the information needed about engineering drawings and the scope of the POI upgrades – these need to be provided by the Connecting Transmission Owner (CTO).

ACE NY 6 – Slide 12 - Can the CTO include preliminary line routing recommendations and a preliminary terminal location? Lead line routing can be challenging to avoid environmental and land constraints so knowing the POI terminal location and approximate lead line route can help with queue attrition by identifying any known constraints earlier in the process.

ACE NY 7 – Can the process be designed to allow for a quick POI feasibility check with the CTO prior to submitting a project via the window? Doing so can filter out dead-end projects before developers and the NYISO invest significant effort into a dead-end project. This will help the long-term attrition problem by weeding out projects as soon as the information is available to do so rather than prepping generator models, acquiring site control, and all the other steps, just to later learn that it is impossible.

ACE NY 8 – On a more conceptual level, as several of the above detailed questions indicate, ACE NY believes that significant efficiencies can be obtained by increasing the access of developers’ consultants to upfront information prior to submitting a formal Interconnection Request to enter the queue window. ACE NY asks that the 2023 project examine ways to improve such access to upfront information.

ACE NY 9 – Slide 12 states that the Phase 1A study will “if applicable/necessary, refine the conceptual breaker-level one-line diagrams due to physical infeasibility.” Please explain this proposed process in more detail. Would it include a search for another POI nearby? Would such POI be deemed acceptable from a material modification perspective?

ACE NY 10 – Slide 10. Will the projects that are in window A be included in the base case of window B?

ACE NY 11 – At the April 3, 2023 TPAS meeting, the NYISO said that the Additional SDU Study process would be used in the window queue approach similarly to how it is used now. Please explain in more detail. Please provide an example showing the way in which such a project re-enters the process.

ACE NY 12 – Please describe the way CRIS-only requests would be handled under the queue window approach?

ACE NY 13 – Is it correct to assume that Expedited Deliverability Studies would be handled the same under a queue window approach as they are under the current approach?

Sincerely,

Mark Reeder

Economic Consultant for ACE NY