Thinh Nguyen February 6, 2023

Sr. Manager, Interconnection Projects

NYISO

Dear Mr. Nguyen,

I am writing to you as a representative of Alliance for Clean Energy New York (ACE NY). On behalf of ACE NY, thank you for the high priority the NYISO is giving to the Interconnection Queue Reform project. ACE NY appreciates the opportunity to provide its input and effort into this undertaking.

Over the past year, ACE NY has worked with its members to develop proposals that we think can improve the NYISO’s interconnection process. A number of proposals have emerged from this process. As per your request at a recent Transmission Planning Advisory Subcommittee (TPAS) meeting, several NY developers that are ACE NY members will be submitting proposals on or about the February 6, 2023 date that was requested.

ACE NY requests that the NYISO give consideration to the proposals that it receives from these NY developers. I am aware of the following proposals that you will likely receive:

* A proposal for the NYISO and TOs to provide more information to developers, including improved data bases, to enhance the ability of developers to do exploratory analyses.
* A proposal to establish pro forma construction agreements.
* A proposal to extend the allowable amount of time from the end of a project’s Class Year Study until the project’s Commercial Operation Date (COD) from the current 4 years to something on the order of 6 or 7 years.
* A proposal to extend the amount of time for the completion of a project’s regulatory milestone. Specifically, for projects that use the two-part deposit to enter a Class Year Study, extend from six months to 18 months the allowable time for the satisfaction of the project’s regulatory milestone, as measured from the time of the completion of the project’s Class Year Study.

In addition, in a separate submission, ACE NY is proposing that the NYISO and stakeholders study two separate and mutually exclusive approaches to improving the SRIS phase of the NYISO’s interconnection process: (1) an SRIS cluster study approach along the lines described in the Federal Energy Regulatory Commission’s 2022 Notice of Proposed Rulemaking on Generation Interconnection Procedures and; (2) an approach that makes use of mini-clusters, based on geography and expected electrical interactions, where appropriate, especially regarding the identification of physically feasible Points of Interconnection.

We look forward to working with you and other stakeholders in examining potential changes to the process in the pursuit of a process that works better for all.

Sincerely,

Mark Reeder

Economic Consultant for ACE NY