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Dear Mr. Nguyen,

Via this letter, Alliance for Clean Energy New York (ACE NY) submits its fourth set of comments in the NYISO's Interconnection Queue Reform project. 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.

ACE NY 1 – How will the Phase 1 and Phase 2 studies (using the terminology from the NYISO's April 19 presentation) handle projects whose studies are going particularly slowly? Will the whole cluster move no faster than its slowest individual project study? Or should there be a provision that allows the removal of projects whose studies are going particularly slowly from the normal study process?

ACE NY 2 – The NYISO has often brought outside experts into stakeholder meetings when new proposals are being considered. For example, this was done in the NYISO stakeholder process's examination of carbon pricing and in the consideration of the Effective Load Carrying Capability approach to capacity accreditation. ACE NY recommends that the NYISO do something similar to enhance stakeholders' understanding of a three-phase queue window approach to interconnection. As you know, there are other ISOs that have experience with such an approach. Having the participation of an expert with experience with the approach, and deep knowledge of its issues and key design decisions, could benefit our examination of the use of the approach for New York.

ACE NY 3 – How might the results of the IEEE-2800 process affect the design of the interconnection process?

ACE NY 4 – The straw proposal retains the feature by which, at the end of the process, projects must put up at-risk deposits that are tied to their interconnection cost allocations. To what extent, if any, does the proposal contemplate making the at-risk deposits at earlier phases in the process a function of their interconnection cost estimates?

ACE NY 5 – ACE NY believes that projects that reach the end of the process, and drop out at that time because they face unusually large interconnection cost allocations, should not be subject to a large penalty in the form of lost at-risk deposit money. ACE NY would like the design to consider a provision that allows such projects to forfeit less money than projects that drop out and do not face large interconnection cost allocations.

ACE NY 6 – The transition from the current interconnection process to the new queue window approach is very important and needs to be discussed. This has been mentioned by other stakeholders, but it is worth repeating.

ACE NY 7 – Does the queue window straw proposal contemplate the retention of the NYISO's Minimum Interconnection Standard (MIS)?

ACE NY 8 – The straw proposal requires that a project's regulatory milestone be completed as a prerequisite for entering Phase 3. In so doing, it eliminates the alternatives that are contained in the current process (e.g., possession of a NYSEERDA REC contract, the two-part deposit alternative). To better understand the issues associated with such prerequisites, historical data would be beneficial. ACE NY requests that the NYISO compile the data for the 2021 and 2023 Class Year Studies to show the number of projects in each Class Year Study that used each of the ways of satisfying the milestone prerequisite or its alternatives.

Sincerely,

Mark Reeder
Economic Consultant for ACE NY