



February 26, 2024

Thinh Nguyen
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Dear Mr. Nguyen,

Re: ACE NY interconnection reform feedback and comments to NYISO – termination of pending studies

The Alliance for Clean Energy New York (ACE NY) appreciates the strong efforts the NYISO has made to develop a reformed interconnection process and acknowledges the good progress that has been made in the last year to create a cluster process that will be a major improvement on the existing process. ACE NY also thanks the NYISO for listening to stakeholder feedback and making significant design changes in response to that feedback. This submission focuses on the NYISO proposal regarding the treatment of pending Attachments S, X and Z studies that was presented to stakeholders at the February 16, 2024, Interconnection Issues Task Force (IITF) meeting.

Termination of Existing Small Generation Facilities Studies

On February 16, 2024, the NYISO proposed that all Small Generation Facilities Studies that are unfinished as of the end of the cluster study application window (currently projected to occur on Oct 15, 2024) be terminated (Slide 38 of NYISO February 16, 2024, presentation to the IITF). ACE NY opposes this proposal. The better approach is to finish all such Small Generation Facilities Studies.

The NYISO indicated that all Small Generation projects that have met the data requirements by the Effective Date (projected to be April 4) will continue to be processed. The NYISO should guarantee that any pending Small Generation Facilities Studies that have met the data requirements by the Effective Date (outlined in Slide 38) will be completed by the end of the cluster study Application Window (Oct 15, 2024). Facility developers that arrive on the Oct 15, 2024, date with Facilities Studies that are nearing completion will be at the end of a long interconnection process that has involved a significant investment of time and resources by the developers. Furthermore, many of these projects are in late-stage development, and if completed, would otherwise be able to enter construction prior to the projected end of the Transition Cluster Study (anticipated to be July 2026). To terminate these projects, blocking their forward progress and making them start all over again with a new interconnection request is both illogical and in clear opposition to the goals of the Climate Leadership



and Community Protection Act (CLCPA). An equitable transition process should recognize this harm and address it reasonably by completing these facilities studies.

Moreover, the alternative – forcing projects with incomplete facilities studies to go into the new queue – would also mean a wasted effort on the part of the NYISO and TOs. They would be working on the study, and then would essentially have to study the project over again.

For many years, Small Generation Facilities Studies and the NYISO’s Class Year (Cluster) Studies have operated simultaneously. The NYISO has adequately accomplished the job of simultaneously getting both types of studies done. Although ACE NY believes there is adequate time between April and October for the NYISO and TOs to complete the approximately 26 Small Generation Facilities Studies that are currently ongoing, any Small Generation Facilities Studies that are unfinished as of Oct 15, 2024 should be completed using the current process until the new, non-transitional, cluster study process begins.

ACE NY acknowledges that a cut-off date needs to be established to prevent a large number of Small Generation Facilities Studies suddenly getting started, potentially slowing down the overall process and hindering the ability of the NYISO to finalize the studies for the later stage projects described above. ACE NY recommends that the requirement to finish the studies apply only to Small Generation projects that either: (1) have an executed Facilities Study Agreement as of January 31, 2024 or (2) have satisfied all requirements for commencement of the study (including confirmation of required technical data) and the short circuit cases have been done and provided to the Connecting/Affected Transmission Owner(s) as of the effective date of the new Attachment HH. The second of the above two cut-off points matches the cut-off point contained in the NYISO’s Feb 16, 2024, presentation (Slide 38).

Full Refunds for Terminated Studies

In the event the NYISO terminates a study (large gen studies and small gen studies) against the wishes of the developer, the NYISO should provide a full refund of all fees paid by the developer. This is just proper business practice whenever a customer pays for a deliverable and the seller fails to provide the paid-for deliverable, in this case the final study report.

Sincerely,

Mark Reeder
Economic Consultant for ACE NY