



**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Thousand Island Solar LLC )**

**Docket No. ER23-780-000 )**

**Comments on the Request of Thousand Island Solar LLC for  
Tariff Waiver and Expedited Action**

*Submitted by The Alliance for Clean Energy New York  
January 11, 2023*

**I. Introduction**

The Alliance for Clean Energy-New York (“ACE NY”) appreciates the opportunity to provide comments in support of the waiver request of Thousand Island Solar LLC. The State of New York has adopted statutory clean energy goals of achieving 70% renewable electricity generation by 2030 and 100% emissions free electricity generation by 2040.<sup>1</sup> Achieving these mandates will be challenging and require success in the siting, financing, and interconnection of many clean electricity generation and energy storage facilities. Thousand Island Solar LLC is one such facility. The approval of its waiver request will enable the project to move through the NYISO’s interconnection process without incurring a damaging delay, and in so doing will help New York in its effort to achieve its nation-leading clean energy goals in a timely manner.

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<sup>1</sup> These requirements are included in the 2019 Climate Leadership and Community Protection Act.

ACE NY is a member-based organization with a mission of promoting the use of clean, renewable electricity technologies and energy efficiency in New York State to increase energy diversity and security, boost economic development, improve public health, and reduce air pollution. Our diverse membership includes companies engaged in the full range of clean energy technologies, but particularly developers of grid-scale renewable energy projects in New York State.

## II. THE COMMISSION SHOULD APPROVE THE WAIVER REQUEST

a. <b>The Project Will Help New York Fulfill its Important Clean Energy Goals</b>
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New York has a long history of seeking to make its electric generation sector cleaner, originally driven by the desire to improve the health of its citizens, and more recently to reduce carbon dioxide emissions so that climate change can be slowed. In 2019 New York passed the Climate Leadership and Community Protection Act.<sup>2</sup> It mandates that New York’s electric generation sector achieve 70% renewable electricity generation by 2030 and 100% emissions-free electricity generation by 2040. Central to the achievement of these goals is the siting, financing, and interconnection of numerous renewable generation facilities and energy storage facilities. Unless steady progress is made in getting these facilities online and operational, New York’s clean energy goals will not be met. Each new facility that becomes operational contributes immediately to the health of New York’s citizens and the reduction of CO2 emissions. These benefits are real and critical.

A large challenge in getting clean energy facilities built is the ability to successfully complete the New York Independent System Operator’s (NYISO’s) interconnection process. Many things can derail a project in its challenging effort to become an operational facility, and one of them is a delay in obtaining its interconnection agreement. Delays not only slow progress, but can cause a project to fail. Absent obtaining the requested waiver of the NYISO’s System Reliability Impact Study (SRIS) deadline for being eligible to enter the 2023 Class Year Study, this project might not be allowed to enter the 2023 Class Year Study, causing a delay in getting its Interconnection Agreement by 1½ to 2 years based on recent experience. That costly delay can be avoided by

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<sup>2</sup> Ibid

waiving the deadline and replacing it with a deadline tied to the date at which the NYISO’s Annual Transmission Baseline Assessment (ATBA) is finalized.

Accordingly, the important benefits of better health of New York’s citizens and the slowing of climate change can be furthered by the approval of the requested waiver. ACE NY supports the waiver request and recommends that the Commission approve it.

**b. Expedited Approval of the Waiver is Needed**

ACE NY supports the request that a decision on the waiver be expedited so that it can occur by February 1, 2023. The NYISO has informed the affected parties that approval by such a date is needed to make sure the 2023 Class Year Study’s processes can smoothly handle the waiver approvals that are being sought. While approval after that date may prove to be acceptable, it is preferable to maximize the probability of a smooth accommodation of the waivers by having the approvals occur by February 1.

**III. CONCLUSION**

As described in the above discussion, granting approval of the requested waiver will result in important climate action and clean air benefits to New York and its citizens. Moreover, the benefits of reduced greenhouse gas emissions accrue to the world’s people as a whole via the resultant slowing of climate change. Further, granting the requested waiver will facilitate a more fair and efficient commencement of the NYISO’s next Class Year Study. For these reasons, ACE NY supports the waiver request and encourages the Commission to approve it.

Respectfully submitted,

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