Eastern Generation would like to submit the following comments on the 2023 Interconnection Reform TPAS presentation given on April 19th, 2023:

* It would be helpful for TO’s/NYISO to provide more information on the POI early in the process. This could include drawings, past queue window/class year study details, past construction costs, environmental assessments for substations, potential headroom on the system for particular bus sections, or a discussion of potential issues associated with interconnection points. This information could help developers identify interconnection costs early.
* Expansion of the pre-application process to include LGIRs could be a good vehicle to allow developers to gain more insight into possible projects before submitting an application.
* It may be prudent to open the succeeding Application review periods immediately after the close of the previous queue window application review period. This would give projects ample time to get into the next queue window and establish viability. Additionally, it would allow developers to submit projects at any time.
* Overlapping windows would be beneficial to speeding up the process. We agree with the proposed timeline suggested on slide 16 of the April 19th presentation.
* It may be wise to add incentives for projects that enter the queue window with a month or more before the deadline. This could reduce the inrush of projects at the last minute.
* Projects should be permitted to change the POI at the close of Phase 1 if the initial POI is found to be infeasible. It may be helpful for the CTO to provide viable alternatives as part of Phase 1.
* Project permitting should have an option to provide deposit in lieu permitting milestones because often the timeline for permitting doesn’t line up with the interconnection process.
* Projects that submit deposits during the transition should have a mechanism for porting those costs to new projects that will land into the new process.