
February 6, 2023

From: AES Clean Energy
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To: NYISO
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RE: Request for Stakeholders to provide comments on Interconnection Reform proposals by the NYISO and any other proposals

AES Clean Energy Development, LLC (“AES”) appreciates the opportunity to comment and propose interconnection process improvements for the New York Independent System Operator’s (“NYISO”) consideration. The changing nature of the electric resource mix and expanded interest and investment in clean energy resources has led to increased queue volumes that are straining NYISO resources. AES supports NYISO’s proactive efforts to engage stakeholders to explore potential reforms to its interconnection process.

AES was founded in 1981 and is a U.S.-based Fortune 500 global energy company with headquarters in Arlington, Virginia and offices in many locations in the U.S., including New York City. AES owns and operates a portfolio of more than 4.4 GW of renewable energy projects including more than 400 utility-scale and community solar, wind, energy storage and hybrid projects across 21 states. With more than two decades of experience working in New York, AES operates 60 projects with approximately 852 MW of nameplate capacity. AES’s development portfolio in New York includes more than 2 GW of utility-scale solar, 50 MW of community solar, and 400 MW in storage capacity. AES owns and operates Valcour Wind, a portfolio of 612 MW of operating wind projects. AES is motivated to lead the industry in developing and growing solutions that will enable the transition to carbon-free sources of energy and achieving the Climate Leadership and Community Protection Act (“CLCPA”) goals of 70% renewable energy by 2030 and 100% renewable energy by 2040.

AES provides the following commentary on the interconnection reform proposals for NYISO’s consideration:

- **Investment in staff support and resources:** AES agrees and would support the NYISO’s continued investment to improve staff support and resources like designating Stakeholder Services Liaisons, having a dedicated Project Manager and improving the Interconnection Portal to help process the growing queue volume in a timely manner.

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- **Reduce duplicative efforts:** NYISO should continue to evaluate and eliminate any duplicative evaluations between the System Impact Study (SRIS) and Class Year Study.
 - **Exploring cluster-based SRIS:** AES supports a transparent conversation between developers and the NYISO regarding what a cluster or mini cluster-based SRIS approach would entail. AES believes that SRIS studies, in some instances, fail to provide the developer with a substantial amount of valuable information. This is, in part, because the SRIS study approach looks at each project in isolation and therefore fails to incorporate nearby cohort projects in its analysis, especially in instances where projects are proposed to interconnect at the same point of interconnection (POI) or POIs are near each other.
 - **Inclusion of physical feasibility assessments in SRIS:** The inclusion of sensitivity analysis in the current scope sometimes fails to capture the physical feasibility challenges that have been observed in the previous Class Year. By entering the Class Year Study without feasible POIs, the Class Year Study is burdened with difficult POI work that can contribute to delays. In some instances, a single project may also be proposing to interconnect at an infeasible station as deemed by the Transmission Developer, NYISO and Connecting Transmission Owner (CTO) because these issues were not fully addressed in the SRIS phase. Regardless of if the NYISO moves forward with a cluster-based approach to SRIS, it should adopt a physical feasibility assessment as part of the SRIS process moving forward.
 - **Timely execution of Interconnection Service Agreements:** In AES's experience, another source of delay in the interconnection process is the time it takes to fully execute an Interconnection Service Agreement (ISA). NYISO should explore how to encourage transmission owners to adhere to ISA processing timelines to ensure that this process doesn't take longer than six months to complete.

AES appreciates the NYISO's consideration of these comments and looks forward to working with NYISO staff and stakeholders to consider needed and timely reforms to the interconnection process.

Sincerely,

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