**4-19-23 TPAS Qcells Comments -** Amy Jo Miller

Qcells does not support on slide 6 Queue Window or Alternative approach as written. Qcells supports clustered study approach but Qcells does not support multiple over lapping cluster windows that causes confusion and potentially restudies. Qcells supports annual cluster windows.

\* Should NYISO have overlapping windows, then Qcells supports starting phase 2 of window B after end of Queue Window A P3 decision.

Qcells believes the proposed phase 1 and 2 studies should be combined. Phase 1 study as written is just application review step. If Phase 1 remains, Qcells believes Phase 1 should be refunded to 100% if there is a withdraw or rejection since Phase 1 has minimal information.

Qcells supports NYISO proposals on: Need binding cost estimates for CTOAFs and local SUFs as early in the process as possible so end of phase 2. Need binding cost estimates for shared SUFs end the end of phase 3.

Developer should be able to withdraw without penalty should local opposition not approve the project, PPA terminated outside of developer control & before phase 2.

Qcells needs to understand on slide 16 (2nd to last bullet point) if NYISO is asking about study or cash/security deposits.

Qcells supports combining all security costs ($/MW for both CTOAF and SUF/SDU).

Qcells does not support phase 1 non-binding high-level cost estimates for Local SUF since Qcells believes phase 1 and 2 should be combined.

Qcells supports phase 2 decision point to be required to show continued site control including the generator lead route and Qcells is open to discussions on post non-refundable security in lieu of satisfying site control.

At pre-application phase, Qcells supports access to fully developed power flow cases from the previous queue window to be used to assess interconnection viability of projects prior to queue submission & one-line breaker diagram of the POI.

Qcells supports NYISO outline impacts to projects currently in queue as soon as possible.