**4-3-23 TPAS Qcells comments – Amy Jo Miller**  
  
Slide 10 is confusing since there is not a timeline. Qcells would like to see what would be the confirmed dates of what the application windows proposal. Qcells supports annual cluster windows.  
  
\* MISO used to have 2 cluster windows. Two cluster windows became unmanageable and MISO went to one cluster study per year. Qcells is concerned that NYISO has a manpower issue and multiple cluster windows could cause further issues and complexities.

Slide 11-Actual study cost should be a one-time cost and not a monthly basis. There should be a fixed cost amount for each study and a known $ amount for max cost if ISO incurs situations such as more than expected projects in a window, etc. Meaning, developers should know max cost per study before entering a study.  
  
\* NYISO please defined mutually exclusive project criteria.  
Slide 13- Qcells believes Phase 1A should be refunded to 100% if there is a withdraw or rejection since Phase 1A has minimal information to project developer to move to Phase 1B.  
  
Phase 1 B & all phases – NYISO please provide detail if it will be one cluster or multiple clusters (geography based).  
  
Phase 2 – Qcells supports posting $/MW cash deposit. NYISO – Qcells looks forward to seeing this proposal on what the $/MW would be. Qcells supports 25% of $/MW at end of Phase 1B Study decision for rejection or withdraw.  
  
\* Qcells need to understand the proposal more before commenting on removal or restructured SRIS. Meaning is Phase 1B replacing current SRIS?