**Mike Caplan – Olivewood Energy**

**Interconnection Queue Reform Comments**

There are simple changes to the interconnection process that would likely provide significant reductions in NYISO workloads and in the time required for the interconnection process.  The interconnection process currently leaves the developer out of collaboration and communication once a study has commenced, but for limited circumstances.  Changes have been made to interconnection applications by NYISO and to system topology by transmission owners after SIS have commenced - and these changes were made without communicating with developers.

Communicating with developers throughout the interconnection study process, including providing developers with results from completed interim analyses, would prevent rework by all parties and identify and address issues earlier.  In some instances, these changes may also lead to some projects withdrawing from the queue earlier in the study process and accelerating the advancement of other projects.

The addition of more roles does not necessarily improve communication and may actually reduce the amount of effective communication between the NYISO and developers.  Adding liaisons reduces collaboration as those individuals become a funnel for information, which may be incomplete or incorrect, and these individuals are not in the position to actually collaborate on identifying or solving an issue with how information is being used or the results of an analysis.

There are, understandably, competing interests within New York.  Potential PPA counterparties may require completion of an SIS prior to accepting a proposal for consideration - as NYSERDA began to require in 2022.  Some towns and other stakeholders do or will expect or encourage a developer to have the SIS complete and an offtake agreement prior to submission of a permit application.  Further, the results of an SIS or facility study or Class Year study may affect the physical footprint of a project thus requiring a potentially lengthy permit-amendment process.  Each party representing one of the legs of the stool (i.e., interconnection, permitting, and offtake) would like for the other legs to be in place before the significant investment of time and resources required to evaluate a project - unfortunately, these wants are mutually exclusive.  Improving communication should be the first step before changes to regulatory and financing milestone requirements.