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February 6th, 2023

Thinh Nguyen
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144

Re: Improvement Recommendations to the NYISO

Dear Thinh :

Recently there have been discussions with the NYISO on queue reform and we believe we have three proposals that could help Developers with interconnection process by providing more information to properly analyze Projects earlier and throughout the process. This in turn could help reduce the NYISO workload with better quality projects entering the queue and the removal of projects from the process based on increased accuracy in commercial analysis. We feel these suggestions could help alleviate some of the stress on the interconnection process and in turn assist in reaching the renewable goals put in place by the state for 2030 and 2040.

The first proposal is for the NYISO to develop transmission capacity information using the latest models used by the interconnection team. Currently other ISO's and RTO's have such tools which greatly aid in streamlining the work done prior to submitting projects to the queue. For example please see MISO's [Interactive Queue Map](#) and [POI Self Check Tool](#).

The second proposal is for the ability to have a pre-queue scoping call. We find that in some cases a project has to enter the queue only to find that the proposed POI is not feasible from the TO. We understand calls can be time consuming so one solution can be for a database that TO's can occasionally update with information on each substation.

The third proposal is to provide a database that includes models used in the Interconnection studies. Developers use this information to look for new project opportunities as well as a continued analysis of the cost/benefit ratio of each project working through the interconnection queue. This is similar to what PJM and MISO currently do, as they release models each DPP/queue cycle. Sharing the models with all Developers at the beginning of the process allows for adequate time to properly analyze the evolving grid to evaluate existing projects and scope new ones.

We appreciate you taking the time to review our proposals and would be happy to discuss further. We understand the stress the NYISO staff is under and believe these changes can reduce the NYISO workload by allowing developers to create better projects and pausing non-feasible projects at an earlier stage through more accurate commercial analysis. We remain committed to working with you to advance the goals set forth by the state in the Climate Leadership and Community Protection Act.

Thank you.

A handwritten signature in black ink that reads "Jennifer Ayers-Brasher". The script is fluid and cursive, with the first name "Jennifer" being more prominent and the last name "Ayers-Brasher" following in a similar style.

Jennifer Ayers-Brasher,
Senior Director, Transmission & Interconnection

Cc:

Ted Dalakos, RWE

Iker Chocarro, RWE

Halie Meyers, RWE