Hi Thinh,

Here are our review comments on the first draft of the new process slides.

\* Support of cluster process in general.

\* Additional details on timeline for each phase, duration of each decision point, study deposit and $/MW amounts are critical information that need to be shared as soon as possible.

\* Site control – suggest allowing deposit in lieu of site control, or at minimum allow partial site control (not sure what level would help us, 50%?). Also define site control.

\* Phase 1 – suggest providing at least indicative network upgrade information, especially if taking 25% of study deposit at this phase, or take a lower %

\* Agree with direction of at least one queue window per year and not starting Phase 2 of new (queue window B) until Phase 3 decision point of queue window A is complete.

\* Another suggestion is to demand both ‘study deposit’ and ‘$/MW’ prior to the commencement of phase II. Also, Include another ‘at risk’ milestone payment prior to entering the phase 3, based on the network upgrade cost triggered by each project in the phase 2 study (MISO has a similar process). This will help those projects to have less $$ impact due to the withdrawal of other projects after phase 3, which had shared a network upgrade.

\* NYISO has to confirm If there will be another class year or not. If not and if 2023 was the last class year, there should be a transition plan for the projects that are currently in FeS, SRIS and for those projects that will be submitted in the queue during this transition period. This will help the developers to plan the projects properly, save time, money and the effort they put in (land, permitting etc..). e.g., For a project submitted at present for SRIS, the developer will spend $150k+ for SRIS studies and then has to wait to enter the new process, which starts from phase 1, will lose significant money as they now have to come up with application fee, study deposits, $/MW etc. under the new process.

At present, PJM queue reform is under way and PJM decided not to study any project under the old process and all the projects that submitted during this transition period, the studies were put on hold until 2026 and these projects will get studied under the new process.

Thank you,

Kevin Godly

Manager- Transmission & Interconnection