Qcells USA Corp. Comments on Interconnection Reform 06-05-23 TPAS Presentation

Qcells would like to better understand interactions and timing between both different groups and windows. **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.  If there is overlapping, it should be administrative and not dual studies taking place.**

How could projects in Group C or D could simultaneously conduct their own feasibility studies as earlier CYQW projects (i.e., Groups A and B) conduct class year studies, even though there may be potential interactions?

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

Page 15, Qcells does not support same process for all sizes.  Qcells would to see rules for projects under 20GWs in a separate queue to limit queue submissions in the studies for bulk electric system (BES) studies.  NYISO please confirm the IC reform is only for projects for BES.

Qcells does like off-ramps for projects that do not require SUFs (system upgrade facilities).

Qcells does not support prioritization.  Qcells also does not support prioritization when there are multiple projects at one POI.  Prioritization creates a disadvantage for developers currently in the queue.

Qcells supports full site control to enter the queue.  If NYISO does move forward with full site control to enter the queue, Qcells recommends removing feasibility study since it is time consuming and provides non-binding results.  Qcells is open to pre-application screening so that there is a thermal screening for developers trying to study multiple POIs to understand if there is physical space for a project or have a thermal overload.

* If feasibility study is limited to just physical feasibility as Qcells is recommending in pre-application screening, should be 100% refunded deposit since not much information is provided to developers.
* If project is cancelled outside of developer control (i.e. such as local opposition) then the withdraw should be without penalty.
* Qcells is open to both options of cash and posting security for all upgrades regardless if for TO’s facilities (CTOAF) or network upgrades (SUFs).
* Site control shall mean documentation reasonably demonstrating: (1) ownership of, a leasehold interest in, or a right to develop a site for the purpose of constructing the Generating Facility; (2) an option to purchase or acquire a leasehold site for such purpose; or (3) an exclusivity or other business relationship between Interconnection Customer and the entity having the right to sell, lease or grant Interconnection Customer the right to possess or occupy a site for such purpose.
* **Generating Facility**shall mean Interconnection Customer’s device for the production and/or storage for later injection of electricity identified in the Interconnection Request, but shall not include the Interconnection Customer’s Interconnection Facilities.

Thank you.

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| A picture containing screenshot, colorfulness, blue, electric blue  Description automatically generated | **Amy Jo Miller**  Director of Policy & Market Strategy l Development  **Qcells USA Corp.**    **M**  +1 216 543 5241  **E**   [amyjo.miller@qcells.com](mailto:amyjo.miller@qcells.com)  **W** [www.qcellsusa.com](https://nam11.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.qcellsusa.com%2F&data=05%7C01%7Cstakeholder_services_Ipsupport%40nyiso.com%7C280be2f1226a4b0472c108db6c2f0487%7C7658602af7b94209bc62d2bfc30dea0d%7C0%7C0%7C638222721469915196%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Q%2BTH%2FR2jQly0mxH3ibBLEwPw5QH9z3LS421iza4za8k%3D&reserved=0)  **A**300 Spectrum Center Drive, Suite 1250, Irvine, CA 92618 |