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June 16, 2023

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

Re: Comments on Class Year Queue Window

Dear Thinh :

We are writing in response to the June 5th TPAS where you presented the Class Year Queue Window proposal. We appreciate all the work that the NYISO is committing towards the revision of the queue process and think that many of the proposed changes will positively impact the process, however we believe that the latest queue reform proposal is a step backwards from what was originally proposed. The reason behind all of these changes is to expedite the interconnection process, help participants make better informed decisions and maintain the reliability of the NYISO system all while working to achieve the goals laid out by the Climate Leadership and Community Protection Act. The Class Year Cluster would be an improvement over the existing process however the NYISO should use this opportunity to strive for major improvements to the process.

Our primary concern is with the timeline presented at TPAS, we understand this is calculated from assumptions based on previous work however the Class Year Cluster does not seem to expedite the process enough, as this is an entire overhaul we feel the process should be shorter and with the current proposal the minimum interconnection process timeline for a project without any delay would be around 3 years. Another area of concern on the timeline stems from the NYISO potentially removing the “exit ramp” after the Part 1 of the Class Year Study. The exit ramp would allow Projects to move forward when they are ready instead of waiting for the rest of the group, this would allow for a more expedited process as well as spread out the Projects so you don’t have the whole of the class year looking to negotiate IAs all at once.

We would also like to see more information on the site control requirements and clearly defining the guidelines that Developers will follow for each technology type. We feel site control has not been covered at this point and would like some clarification. We are looking for a clear designation of acres/MW for each technology as to simplify the design of projects for Developers and the NYISO process for reviewing site control. Most importantly this would level the playing field for Developers, we understand the NYISO has certain guidelines they follow but believe further discussion would be beneficial during the reform especially for offshore wind and battery storage. For example PJM requires 0.1 acres/MW for battery storage and 30 acres/MW of wind which offshore should have identical treatment.

One minor comment is how there is no reform on the IA process, we feel this is another step of the interconnection process that should be looked at as it can cause delays. The body of the IA is a boilerplate document however appendices of the document draw upon the NYISO studies which vary greatly. standardizing the NYISO studies to align better with the IA outline could help expedite the

creation, review and revision of the Interconnection Agreement. These are not reforms to the process however they should be considered.

We appreciate you taking the time to review our comments and would be happy to discuss further. All of the changes we have seen have been positive and we welcome these proposals to the process. With input from the stakeholders we are confident that we can evolve the process to be expedient and efficient.

Thank you.

A handwritten signature in black ink, reading "Jennifer Ayers-Brasher". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Jennifer Ayers-Brasher,
Senior Director, Transmission & Interconnection

Cc:

Ted Dalakos, RWE
Iker Chocarro, RWE
Halie Meyers, RWE