GRANITE SOURCE POWER

December 29, 2025

To: NYISO Interconnection, Thinh Nguyen,

Transmission Planning Advisory Committee

From: Granite Source Power

Subject: 2026 Cluster Study Enhancements

Introduction

Granite Source Power ("GSP") appreciates the opportunity to submit these comments regarding enhancements to the cluster study process. GSP was incorporated in 2022 to develop utility-scale battery energy storage ("BESS") and solar projects in multiple markets across the United States to improve grid reliability and energy affordability. The company's co-founders and employees had more than six decades of collective experience in the renewable energy industry, during which they developed, sold, and acquired over 12,000 MW of onshore wind, solar, and BESS projects and closed more than $10B of tax equity, cash equity, and debt financing.

As the system evolves, connecting new resources will be critical for maintaining reliability and resource adequacy while achieving the state's climate goals. As NYISO has recognized, continuous improvement to the interconnection process is imperative for bringing new resources online in an efficient and timely manner. Based on our experience in the cluster process this year, we agree that it is essential to revise the process ahead of the 2026 cluster study process. Investing time and resources into projects that have little to no chance of moving forward due to interconnection constraints is a waste of time and money and will slow down the entire interconnection queue. As a developer, we share NYISO's goal to increase efficiencies in the early stages of the cluster study process to prevent delays later in the process. We believe that in order to do so, the Transmission Owners ("TOs") and NYISO must, early in the process, (1) strive to provide good quality information about the local system and (2) dedicate time and attention to key gating items (e.g. physical infeasibility, major constraints, etc.).

We recognize the challenge NYISO faces with an increasing number of projects requesting interconnection and a decreasing amount of time to study them. The recommendations for potential improvements we make in these comments are intended to improve the process from an interconnection customer's perspective based on the processes and decisions that are available to us. Our goal is for the interconnection customer ("IC") to have enough information to make a reasonable decision regarding the probability of success of the project, to ensure that only projects with a high probability of moving forward enter and remain in the queue, which should lead to efficiencies for the interconnection customers, NYISO, and the TOs.

Summary of Recommended Potential Improvements		
Stage of Process	**Potential Improvement**	**Benefit/Impact**
Pre-Application	Update the pre-application report form to include additional information about the proposed interconnection location and previous applications	- Additional information will allow projects to make better decisions about entering the cluster - Fewer withdrawals later in the process
	Eliminate the pre-application report scoping meeting and instead establish a pre-application report results meeting	- Allows for more productive conversation on proposed POI - Similar timeline to current process
	Allow and encourage the TOs to use third-party consultants to conduct pre-application reports	- Reduced administrative burden on the TOs - Addition information from consultants familiar with studying the system
Interconnection Request	Remove duplicative information requests from the Interconnection Request Form	- Fewer deficiencies and questions - Less information for the interconnection customer to provide - Less information to validate
	Standardize site plan requirements across all TOs	- Allows for standardized review - Fewer requests for additional information
Physical Infeasibility	Clarify the definition of Physical Infeasibility to remove ambiguity and discretion	- Fewer deficiencies and related withdrawals and disputes
	Provide additional and standardized information in the written report once a project is deemed physically infeasible and require a results meeting between the TO, IC, and NYISO	- Fewer disputes
	Report additional metrics about Physical Infeasibility determinations in the cluster reports	- Additional information will allow future projects to make better decisions about entering the cluster
Deposits	Provide clarity and transparency on deposit refund timelines	- Reduced outreach and administrative efficiencies

	Use study deposit to pay study costs	- Administrative efficiency - Reducing unnecessary costs
Metrics and Reporting	Provide standard upgrade cost and construction time estimates	- Additional information will allow projects to make better decisions about entering the cluster - Fewer withdrawals later in the process
Roles and Responsibilities	Identify land acquisition and permitting responsibilities early in the process	- Additional information will allow projects to make better decisions about entering the cluster - Fewer withdrawals later in the process

I. Pre-Application Process

The pre-application process is a critical tool for developers to evaluate whether they should submit a project into the cluster study process. The pre-application process should provide interconnection customers enough information about their projects and point of interconnection to make decisions regarding feasibility, location, and configuration. The more information an interconnection customer receives during the preapplication process, the better their interconnection request will be and the less likely that interconnection request will trigger physical infeasibility screening, deficiency notices, and withdrawal later in the process–all of which slow the pace of the queue and risk future delays.

Recommendation: The current Pre-Application Report Form does not provide developers sufficient information to determine whether a project should continue with its chosen Point of Interconnection. To provide additional information prior to submitting an interconnection request, the Pre-Application Report Form should include additional fields for:

1. Identification of all projects (active and withdrawn) that submitted interconnection requests at the same or electrically close Point of Interconnection over the past three years
2. Preliminary physical infeasibility screen
3. Separate response areas for each of the items included in the parenthetical for "Additional Information," including:
    - potential new substation bus configuration,
    - transmission constraints,
    - planned transmission upgrades,
    - parallel lines,
    - breaker rating,
    - available breaker positions,
    - existing/known constraints,
    - ROWs and clearance constraints
    - Substation footprint and ability for expansion
    - Standard substation footprint sizes

In addition to the information above, the pre-application process should be modified in two additional ways to provide this information efficiently and with sufficient detail for the IC to make a decision regarding its project.

Recommendation: First, NYISO should eliminate the pre-application scoping meeting and instead establish a pre-application results meeting, while maintaining a similar overall timeline to the current process:

- 25 days after the TO confirms that it is the appropriate entity, the TO would deliver the the Preliminary Pre-Application Report to the IC
- Once the IC receives the Preliminary Pre-Application Report, the TO and the Interconnection will schedule a results meeting
- The TO and IC will have a meeting to discuss the findings of the Preliminary Pre-Application Report
- 5 business days after the results meeting the TO would deliver a final Pre-Application Report

This results in a similar timeline to the current process, but has the meeting between the TO and IC take place after the pre-application report is delivered to the IC rather than before. This would allow the IC to ask the TO questions about the report findings and lead to a more fruitful discussion of the proposed POI.

Recommendation: Second, the TOs should be allowed to and encouraged to contract with third-party consultants to conduct the pre-application reports. The TOs use third-party consultants to conduct their interconnection studies and often these entities have an intimate knowledge of the local system and expected constraints. Bringing these parties into the pre-application process could potentially identify constraints on the

II. Interconnection Requests

Currently the interconnection request form requires duplicative information, which results in additional administrative burden on IC's and additional areas where NYISO or the TOs might have questions regarding the project, which could result in additional deficiency notifications. Simplifying the IR Form should reduce the number of questions and responses required by the IC, resulting in a more efficient process.

Recommendation: GSP supports NYISO's efforts to identify and consolidate interconnection request information.

In addition to reducing duplicative requests, we believe that the interconnection process would be more efficient if there was standardization across the TOs regarding the information that needs to be submitted. This would reduce the number of individual requests from the TOs, which could result in additional deficiency notifications.

Recommendation: In particular, NYISO and the TOs should establish a set of standardized site plan requirements that works across the entire state. For example, as part of PJM's New Service Request Manual, they include an attachment with detailed information, examples, and requirements regarding site plans, see PJM Manual 14H, Attachment J: https://www.pjm.com/-/media/DotCom/documents/manuals/m14h.pdf

III. Physical Infeasibility

A determination of Physical Infeasibility is a significant finding for a project, as it essentially stops the project's progress in the interconnection queue and potentially kills the project altogether. Naturally, when a project receives a physical infeasibility determination, the project developers, owners, and investors all want to know as much information as possible about the situation. In order to enter the queue, an owner will have already invested a significant amount of time and resource into developing and designing a project that they believe to be viable. A physical infeasibility determination puts that work at risk.

Currently, the information and process to determine whether a project is infeasible results in a significant amount of ambiguity and uncertainty, which leads to questions from the IC, which slows the interconnection process. More information and more transparency into physical infeasibility determinations will result in a more efficient process, even if providing that information requires additional process and time. Additional time spent up-front on these determinations, will result in a more efficient process in the long run.

Recommendation: First, GSP believes that additional clarity is needed in the definition of Physical Infeasibility in section 40.7.3.2 of the OATT. Section 40.7.3.2(1)(c) should be removed or clarified because it does not provide a bright-line standard for determining physical infeasibility. As currently written, this item is not directly tied to the acquisition or control of land nor equipment available for use. Therefore, it gives a TO wide discretion on when it can be applied, so long as the TO thinks that the interconnection request is inconsistent with "Good Utility Practice or Applicable Reliability Requirements." Therefore, we believe the following redline should be made, recognizing that NYISO verifies an interconnection request and throughout the study process NYISO and TO identify what upgrades are necessary to interconnect the project consistent with Good Utility Practice and Applicable Reliability Requirements. The TO should not be allowed to deem a project physically infeasible due to the complexity of those interconnection upgrades.

> 40.7.3.2 An Interconnection Request shall be deemed Physically Infeasible if:
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> (1) (i) the substation for the selected Point of Interconnection does not have any available bus positions and (ii) (a) is not expandable electrically or within the existing substation footprint, or (b) adjacent usable vacant land is not available~~, or (c) proposals by Interconnection Customer are inconsistent with Good Utility Practice or Applicable Reliability Requirements;~~ or

Recommendation: Second, NYISO should require the Transmission Owner to provide the Interconnection Customer all relevant studies conducted in its determination of physical infeasibility and any studies completed, or partially complete, at the date that the project project is withdrawn due to physical infeasibility. At the time that the project is withdrawn by NYISO due to Physical Infeasibility, an IC could have spent a significant amount of money on studying the project. ICs should receive all work completed with these funds. Currently, there is no standardized methodology for providing information regarding physical infeasibility, nor

requirements for the written report that the TO provides to NYISO. We would recommend that the TO and NYISO be required to include in the written report of physical infeasibility:

- Known information regarding the adjacent parcels and why land cannot be acquired or developed
- Steps taken with adjacent land owners regarding the property
- Any technical analysis conducted to determine the size and footprint of the needed new infrastructure
- Any technical analysis conducted to determine the interconnection requirements for the facility
- Analysis of any grid enhancing technologies which would allow for the interconnection of the facility in a physically feasible manner

Because this is a significant determination, we anticipate that the interconnection customer will have questions regarding the report. We believe that it would be administratively beneficial to establish a requirement in the tariff to hold a meeting to discuss these results. We believe that this meeting will provide an opportunity to understand the TOs determination, which could avoid the formal dispute process–which has a higher risk of impacting the overall cluster timeline.

These requirements could be included in section 40.7.3.3 of Attachment HH of the OATT.

Recommendation: Finally, NYISO should publish a summary list of all projects that received physical infeasibility determinations during and after the Customer Engagement window in the summary Cluster Study Reports. While NYISO did identify some projects that received physical infeasibility determinations between the cluster engagement window and the publication of the Phase 1 reports, not all projects that received physical infeasibility determinations were included in the summary report.

A complete summary of all projects that received physical infeasibility determinations throughout the cluster study process is essential to avoid a different developer proposing the same Point of Interconnection in the future.

IV. Deposits

As part of the interconnection study process, project owners are required to make significant deposits to NYISO to ensure customer readiness. While GSP is not opposed to making these deposits, once a project is withdrawn, it is critical for the appropriate portions of deposits held by NYISO be returned to the interconnection customer in a timely manner. Project developers need to have a clear understanding when they should expect to receive their deposits back.

Recommendation: NYISO should create a clear and transparent timeline in their tariff for the return of any held deposits and should communicate an exact date by which a deposit will be returned at the time the project has been withdrawn from the interconnection queue. Clear and transparent dates will allow interconnection customers to manage their cash flows appropriately and reduce the number of inquiries that NYISO receives regarding the return of deposits providing administrative efficiencies.

The prompt return of deposits is particularly important in NYISO, given that NYISO does not draw upon the study deposit, meaning that an interconnection customer might have a significant

amount deposited with NYISO between the readiness deposit and the study deposit. NYISO is one of the only, if not the only, RTO that requires the IC to make a study deposit (intended to be security for payment related to interconnection study costs) but then does not draw upon that study deposit in order to pay the costs of the interconnection study. This practice means that an IC needs to have twice the amount of cash or credit available to pay for the study of the interconnection, which could be a significant barrier for smaller developers or projects.

Recommendation: NYISO should draw upon the study deposit to pay interconnection study costs. This avoids interconnection customers having to secure twice the amount of credit for their projects, which would eliminate unnecessary financing costs.

V. Metric and Reporting

The queue is most efficient when interconnection customers and transmission owners have a clear expectation of the results of the study process. NYISO, along with the other RTOs, in compliance with Order 2023 and in their previous queue reform processes have taken significant steps to provide data to interconnection customers to allow them to study projects before the cluster study process begins. This additional data has resulted in significant efficiencies in the interconnection study process, as project developers have a much better understanding of the probability that their projects will be assigned network upgrades and a better expectation of what those network upgrades will be.

While significant improvements have been made on what developers should expect for the interconnection facilities, not a lot of additional data is available regarding the expected costs and time for installing these interconnection facilities. Developers must rely on existing studies and their best estimation of costs and time to make a decision of whether they are willing to submit an interconnection request. Additional transparency into standard cost and time estimates by transmission owners would help interconnection customers make informed decisions about moving forward with their projects.

In MISO, MISO staff has developed a Transmission Cost Estimate Workbook as part of its planning process associated with the MISO Transmission Expansion Plan, which provides a significant amount of transparency into expected network upgrade costs see:

- Transmission Cost Estimation Guide For MTEP25: https://cdn.misoenergy.org/MISO%20Transmission%20Cost%20Estimation%20Guide%20for%20MTEP25337433.pdf
- MISO Transmission Cost Estimate Workbook for MTEP: https://cdn.misoenergy.org/MISO%20Transmission%20Cost%20Estimate%20Workbook%20for%20MTEP25547535.xlsx

Recommendation: Recognizing that the MISO guide was developed for the transmission planning process, NYISO should work with the TOs to release standardized upgrade costs and substation expansion footprints like those included in the MISO Transmission Cost Estimate Workbook to provide interconnection customers better visibility into expected costs. Alternatively, NYISO could provide summary statistics after the Phase 2 cluster study report on

the average costs of the infrastructure by infrastructure category by transmission owner and the average time each transmission owner expects to complete each type of upgrade. While an administratively intensive task at the end of the cluster process, we believe that NYISO is in the best position to aggregate this information and that this information would save NYISO and TOs time in the long run as it would provide interconnection customers with more realistic expectations for the cluster study process, resulting in fewer inquiries, disputes, and withdrawals.

VI. Roles and Responsibilities

The process to develop and construct infrastructure in New York is complex. In addition to the interconnection study process, developers are managing among other things permitting, real estate acquisition, and offtake agreements for their projects. Each additional piece of infrastructure necessary for the interconnection of the project adds to this complexity. New substations, generation tie lines, substation expansions, and other network upgrades need to go through rigorous real estate acquisition, sitting, and permitting processes.

Currently, the interconnection process provides little clarity on the roles and responsibilities associated with siting and permitting new infrastructure. And typically, the TO will only engage in these discussions during or after the negotiation of a final interconnection agreement, which is at the end of the interconnection process–well after a project has put down significant at-risk deposits and well into the development process of project. Even within the interconnection agreement, the *pro forma* language in articles 5.13 and 5.14 speak to good faith coordination but do not provide specific roles and responsibilities of the parties of the agreement. In a market like NY with high development risk around permitting and land, this creates an impossible mismatch where key development activities related to the interconnection facilities occurs after the rest of the project is fully developed. Project developers need certainty early in the interconnection process for which entity will be responsible for permitting which pieces of equipment.

Recommendation: In the phase 1 and phase 2 study reports, for each network upgrade, the TO should indicate which entity(s) are responsible for acquiring land and permitting the piece of infrastructure and the process by which any land and permits would need to be transferred from an IC to a TO, if applicable.

Conclusion

GSP looks forward to engaging with NYISO and other stakeholders on these recommendations and other potential improvements to the cluster study process.