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Dear Thinh and Sara,

RWE submits the following comments with targeted recommendations to accelerate the NYISO generation interconnection process. Given the shortened timeline to access federal tax credits, it is critical to explore ways to expedite deployment of generation with NYISO to help New York State achieve its Clean Energy Standard (CES) goals.

RWE recommends the following **NYISO process improvements**:

*i. Earlier NYISO notification regarding Non-Local System Upgrade Facilities (SUF):*

**RWE recommendation:** NYISO should present anticipated Phase II SUFs and their responsible parties as early as possible to all cluster participants and notify them once the full list of expected upgrades has been identified.

**Objective:** Enable Developers to assess potential upgrade needs before the SUF Facility Study, allowing earlier negotiations of E&P or LGIA while minimizing the risk. This will significantly accelerate development and COD timeline.

**Rationale:**

- Transparency allows Developers to determine the magnitude of potential upgrades earlier in the process, reducing risk and creating an “exit ramp” in Phase II for projects with minimal to no Phase II SUFs
- Minimizing risk to Developers enables them to enter into an E&P or LGIA during phase II
- This would benefit the NYISO by spreading out IA negotiations and allowing them to leverage executed E&P agreements for the LGIA basis.

**Risk of Inaction:** If NYISO does not notify Developers early on in the process, project timelines can be extended 8+ months while Developers wait for the completion of the cluster to tender their LGIA..

*ii. NYISO Tender the Interconnection Agreement sooner*

**RWE recommendation:** NYISO should tender and affected parties should negotiate the IA within three months (30 days to tender, 60 days to negotiate) of the completion of the cluster study.

**Objective:** To reduce delays in IA tendering and negotiation and provide more certainty to Developers.

**Rationale:**

- The current tariff language lacks specificity (“as soon as practicable”) creating the risk of delay
- Other regions such as PJM and SERC have codified timelines in their tariff and will tender a LGIA within 30 days and negotiate within 30 days
- The current tariff requires negotiations of the LGIA within 180 days, this can lead to significant delay between the end of NYISO studies and commencement of project work.

**Risk of Inaction:** Extended LGIA timelines can lead to delays in COD for projects. Not codifying time frames for tender and negotiation introduces additional risk to Developers and their timelines.

*iii. Prepopulate the Interconnection Request forms*

**RWE recommendation:** Allow Developers to complete the Interconnection Request forms in the project portal prior to the application window opening and submit pre-filled forms once the window begins.

**Objective:** Reduce errors in the initial application filings while maintaining the queue positioning rules.

**Rationale:**

- Current rules incentivize some Developers to prioritize speed over accuracy of their initial IR submittal to secure a lower queue position
- A prefill would allow for these Developers to better complete the application while still maintaining an early submittal
- Allowing one week prior to the application window to prefill forms gives sufficient time to complete and review applications.

**Risk of Inaction:** Significant errors in the initial applications for projects that prioritize queue positioning.

*iv. Fast Track Interconnection Process*

**RWE recommendation:** Submit a proposal to FERC, similar to PJM's Resource Reliability Initiative (RRI), introducing a fast-track interconnection process for eligible projects to addressing New York reliability constraints.

**Objective:** Prioritize construction of “shovel-ready” projects to meet near-term reliability needs.

**Rationale:**

- PJM's RRI, approved in February 2025 has accelerated approximately 10 GW of high-reliability resources through a scoring process
- Surging load demand in New York underscores the need for similar measures
- Filing with FERC for an expedited decision, leveraging the existing PJM RRI process to allow projects demonstrating certain CODs to the "jump the queue"
- Prioritizing advanced projects can bring resources online before Q4 2028, addressing reliability gaps.

**Risk of Inaction:** Maintaining the status quo risks the reliability of the NYS transmission system and could require significant upgrades that could be mitigated through additional generation.

In addition to the above recommendations NYISO proposed many different potential improvements at the December 3<sup>rd</sup> TPAS. A few of the proposals that RWE support include the simplified IR form, Conditional Phase 1 entry for physically infeasible projects and increased training for interconnection customers. One proposal that RWE opposes is the removal of withdrawal cure periods for certain deficiencies. Although the removal of the deficiency cure period could provide marginal improvements to the timeline, the risk to the interconnection projects vastly outweighs any potential benefits.

**Conclusion:**

NYISO has identified growing near-term reliability risks in New York's grid, driven by rising peak demand, limited generation, and delayed transmission. These issues are worsened by federal policy changes reducing tax incentives for renewables, further tightening supply. These comments identify NYISO process improvements and recommend a fast-track interconnection path to accelerate generation interconnection. If adopted, these steps could advance project CODs and bring over 1 GW of clean energy online for RWE alone while supporting New York's 70% renewables goal by 2030. We look to work with the NYISO and other Stakeholder Participants to better the interconnection process.

Sincerely yours,

*Ted Dalakos*

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