

Via E-Mail to interconnectionsupport@nyiso.com, tnghuyen@nyiso.com, skeegan@nyiso.com

To: New York Independent System Operator, Inc. (“NYISO”)
From: Matthew Schwall, Director of Market Policy & Regulatory Affairs
Date: April 8, 2019
Re: **Ideas for Speeding up Interconnection & Class Year Processes**

The Independent Power Producers of New York, Inc. (“IPPNY”) submits these comments on a number of the ideas presented to stakeholders at the April 1, 2019 joint TPAS/ESPWG with the goal of developing proposals for speeding up the NYISO interconnection and Class Year processes. Lack of comment on certain ideas indicates neither opposition nor support.

1) Separate Additional SDU Studies from the rest of the Class Year

This idea appears to be an outgrowth from the NYISO’s conceptual tariff waiver that would have allowed CY19 to commence while the single project undergoing additional SDU studies in CY17 remained in the CY. Given sufficient forewarning of the waiver request and fair treatment for developers seeking to enter CY19 (as was proposed in IPPNY comments on the tariff waiver in February), such a proposal may have been effective in speeding up the commencement of CY19 while allowing the CY17 SDU study to be completed, but it is uncertain whether the concept would be sustainable or practical for Class Years with several SDUs. Currently, the most complex SDU studies are those associated with the downstate area, however, given the increasing number of projects proposing to interconnect in the NYCA, it is likely that upstate SDU studies will be required in future Class Years, particularly if new transmission does not keep pace with interconnection requests.

One potential problem with allowing a future Class Year to commence while a current Class Year with ongoing SDU studies continues is that the NYISO will be required to assume multiple permutations of SDU affected projects from the current Class Year in the future Class Year base case – which could have the unintended consequence of slowing down Phase 1 of the future Class Year.

3) Require deliverability evaluation in the SRIS

The idea to require that deliverability studies be conducted as part of the SRIS was recommended by IPPNY at the annual NYISO sector meetings and we support the NYISO approaching stakeholders with a proposal for review. Out of all of the ideas presented, we believe this one has the greatest potential to speed up future Class

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Years because it would result in the identification of deliverability issues and costs associated with projects prior to the commencement of a new Class Year, which will allow additional time for developer and NYISO review.

Part of the idea presented at the meeting was to limit the requirement to facilities over a certain size, *e.g.*, 250 MW. If there is going to be a limitation to the requirement, it would be better to base the limit on the relationship between the project and whether it appears there is sufficient headroom on the system to accommodate the project. A better idea all together would be to require that ALL projects seeking CRIS be required to undergo deliverability studies as part of the SRIS, the benefit of which would be less potential for Class Year delays due to unexpected SDUs for certain projects. For those projects that have already received their SRIS and will enter CY19, it could be reasonable for some version of idea #1 to be used as a transition until all projects entering a future Class Year that seek CRIS have deliverability studies performed as part of the SRIS.

6) Create more stringent CRIS expiration rules

As described at the meeting, this idea is intended to address instances where projects are awarded CRIS but never enter the market, making that CRIS unavailable for other developers who do plan on entering the market. Currently, there is no mechanism that would revoke awarded CRIS rights if a project never participates in the market. IPPNY is tentatively supportive of a reasonable proposal aimed at addressing this problem, depending on the details.

7) Allow provisional/interim CRIS for Small Generators prior to going through a Class Year Study

IPPNY opposes this idea. It would be unfair and potentially discriminatory to allow a generator to be granted provisional CRIS rights purely because they are small in size when large generators are required to go through the Class Year to obtain CRIS. If the justification for this idea is that small projects are more quickly developed and therefore should not be tied up in a long Class Year process in order to receive CRIS rights, that concern would be more appropriately addressed through adoption of a number of the other proposals presented at the meeting intended to speed of future Class Years.

Other ideas that IPPNY would support the NYISO fleshing out further and developing proposals for include: #9, which would require the development of agreements with PJM and ISO-NE governing schedules for performing affected system studies; #12, which would limit analytical work to incremental “system and/or projects’ interaction analysis”; and #16, which would require developers to submit project data on the Class Year Start Date versus in conjunction with an executed Class Year Study Agreement. IPPNY is concerned by and may oppose proposals developed for idea #10, which would identify the best upgrade solution in light of Good Utility Practice versus the least cost solution (such a proposal would inappropriately shift transmission upgrade costs to developers and away from TOs, which is

where those costs rightfully belong), and #11, which would provide non-binding versus binding cost estimates for upgrade facilities.

IPPNY appreciates the NYISO collating and presenting the aforementioned ideas to stakeholders for feedback and looks forward to continued work to improve the NYISO interconnection and Class Year processes.

Respectfully submitted,

/s/ Matthew Schwall

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