



119 Washington Avenue, Suite 1G
Albany, NY 12210
518.432.1405
info@aceny.org | www.aceny.org

April 5, 2019

Thinh Nguyen, Sr. Manager Interconnection Projects,
New York Independent System Operator (NYISO)
TNguyen@NYISO.com

Deborah Eckels, Liaison,
New York Independent System Operator (NYISO)
deckels@nyiso.com

[Via email: InterconnectionSupport@nyiso.com](mailto:InterconnectionSupport@nyiso.com)

The Alliance for Clean Energy New York (ACE NY), via this letter, is providing additional comments on redesign ideas about the NYISO's interconnection process, especially as regards the Class Year (CY) Study. ACE NY provided its initial comments in a letter sent on March 15, 2019.

ACE NY is a non-profit membership organization whose mission is to promote clean energy, energy efficiency, a healthy environment and a strong economy for New York State. This diverse coalition includes private renewable energy and energy efficiency companies, environmental and economic development organizations, academic institutions, and consultants to the energy sector. The clean energy technologies represented by ACE NY members include land-based wind, offshore wind, hydropower, biomass, fuel cells, energy efficiency, energy storage, distributed wind, and solar.

ACE NY is continuing to study the many ideas that were contained in the April 1 presentation at the Transmission Planning Advisory Subcommittee (TPAS) meeting. For some of them ACE NY is still developing a position. For others, ACE NY shared its views in its March 15 letter. In this letter comments are provided on new ideas about which ACE NY has not yet commented.

The first three numbered ideas in the April 1 presentation are related. They are: (1) Separate additional SDU studies from the rest of the Class Year (this is akin to the waiver the NYISO considered earlier this year); (2) Separate evaluation of upstate and downstate projects and; (3) Require deliverability evaluation in the SRIS. The first two are advisable and should be implemented even if the third one is also implemented. The requirement that deliverability be evaluated in the SRIS (idea #3) could, in some instances, help to shorten the length of CY Studies, but ideas #1 and #2 are needed even if idea #3 is implemented. Even with idea #3 in place, there will be instances in which additional SDU studies are needed. In such instances, adequate protection from long delays in CY Studies will require that ideas #1 and/or #2 are in place.

At the April 1 meeting, a party recommended that the NYISO tighten the windows for obtaining needed work from the Transmission Owners and that the NYISO strengthen its oversight in making sure that the needed input from Transmission Owners is timely and does not cause delays

in the process. ACE NY supports this recommendation and believes that a heightened effort by Transmission Owners to act more quickly in interconnection studies is an important component of speeding up the overall process.

ACE NY supports idea #16 – Require Developer to submit project data on Class Year Start Date vs. with the executed Class Year Study Agreement. Because this will reduce the time between CY studies, with adding only the need for a heightened attention to submitting data by project developers, it should be adopted.

ACE NY does not at this time take a position on idea #14 – Adopt a PJM-like “queue window” approach. ACE NY does believe the NYISO and the parties should invest the time in studying this approach for possible use in New York.

ACE NY does not support idea #13, first part – Make Class Year eligibility requirements more stringent to limit the Class Year to projects with more certainty. It is noted that no specifics accompanied this idea. If it can be shown in the future that large numbers of projects are entering the Class Year that never get built, and if it can be shown that a more stringent eligibility requirement would yield significant time savings, ACE NY would reconsider this position

Finally, offshore wind has not been specifically mentioned in the redesign effort to date. There needs to be an efficient and workable regulatory milestone applied to offshore wind, and it is currently somewhat unclear how the current milestones would apply to offshore wind as they are linked to Article 10 and SEQR, but not to a federal permitting regime.

ACE NY appreciates the opportunity to share these comments and stands ready to work with the NYISO and the market participants to achieve valuable improvements to the interconnection process.

Sincerely,

Mark Reeder
Mark Reeder Economics
Consultant for ACE NY