

**Comments of Environmental Advocates, Natural Resources Defense Council, Pace Energy and Climate Center, and Riverkeeper on August 1, 2016 “Proposed Comprehensive Queue Reform Initiative”**

**August 22, 2016**

Environmental Advocates, Natural Resources Defense Council, Pace Energy and Climate Center, and Riverkeeper (collectively Joint Commenters) hereby submit these comments on the New York Independent System Operator (NYISO) August 1, 2016 Proposed Comprehensive Queue Reform Initiative (Queue Initiative). Joint Commenters applauds the NYSIO in attempting to address numerous inefficiencies in the interconnection process. Achievement of New York State’s 50% x 2030 Renewable Energy Mandate (50% Renewable Energy Mandate) facilitated by the Clean Energy Standard and Reforming the Energy Vision initiative will require the development and implementation of a significant amount of new renewable energy infrastructure. While distributed generation will have an important role, there will be an extensive surge in grid-scale projects proceeding through the interconnection queue.

The key to an efficient interconnection process is timely commitment, reasonable study of costs and procedures and effective timelines. The Proposed Comprehensive Queue Reform Initiative is a proactive start in resolving inefficiencies, however in order to accomplish New York State’s 50% Renewable Energy Mandate, effective queue reform must be more robust and extensive.

Joint Commenters support the proposed revisions such as electronic form submission, interconnection requests for multi-level voltages, expediting of power study agreements, improved class year alignment for small generators, and more flexible refund and withdrawal procedures. However, while the proposed concepts in the Queue Initiative should be pursued, Joint Commenters strongly suggest the following additional modifications be considered in order to adequately transform the interconnection process:

- (1) Benchmark the length of time it takes projects to proceed through the interconnection process in other RTOs and compare that to New York;
- (2) Identify best practices for an efficient interconnection process in other RTOs, analyze application of those processes in NY, and publicize the results of that assessment;
- (3) Focus on options for simplifying the Class Year Study process including elimination of the regulatory milestone, exemption of renewable energy projects that are seeking approval for energy-only and renewable energy projects that are less than 25 MW - for projects not going through the Class Year, the cost allocations for shared SUFs could be made based on the SRIS

facility study; and

- (4) Link the regulatory milestone to an action of the New York State Board on Electric Generation Siting and the Environment that follows the submittal of the preliminary scoping statement (PSS) as the PSS is analogous to the DEIS, the regulatory milestone under the State Environmental Quality Review Act process which evidences project commitment through investment.

While ensuring reliability is critical, modifications to streamline the interconnection process can be made that will not sacrifice reliability. Accordingly, Joint Commenters strongly support NYISO aggressively pursuing any and all efforts to make the interconnection process more efficient in order to better accommodate the increase in interconnection requests driven by the 50% Renewable Energy Mandate.

Respectfully submitted,

/s/

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