New York ISO
Independent System Operator

10 Krey Boulevard, Rensselaer, NY 12144
Ph: 518.356.6000 | **Fax:** 518.356.8899

February 12, 2024

By Electronic Delivery

Honorable Debbie-Anne Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: New York Independent System Operator, Inc., Interconnection Study Processing Metrics Informational Filing, Docket No. ER19-1949-000

Dear Acting Secretary Reese:

The New York Independent System Operator, Inc. ("NYISO") hereby submits an informational filing containing interconnection study metrics for the fourth quarter of 2023 pursuant to Section 30.3.4.2 of its Open Access Transmission Tariff ("OATT")[1] and consistent with the requirements of Order Nos. 845 and 845-A.[2]

I. List of Documents Submitted

The NYISO respectfully submits the following document with this filing letter:

- Attachment A – Details of Interconnection Study Delays for Fourth Quarter of 2023.

[1] Capitalized terms that are not otherwise defined in this filing shall have the meaning specified in Attachment X of the NYISO OATT and, if not defined therein, in Attachment S of the NYISO OATT and Section 1 of the NYISO OATT.

[2] *Reform of Generator Interconnection Procedures and Agreements*, Order No. 845, 83 Fed. Reg. 21342 (May 9, 2018), 163 FERC ¶ 61,043 (2018) ("Order No. 845"), *order on clarification and reh'g*, Order No. 845-A, 166 FERC ¶ 61,137 (2019) ("Order No. 845-A"). For convenience, unless otherwise specified, references in this filing to "Order No. 845" encompass Order Nos. 845 and 845-A.

II. Communications and Correspondence

All communications, pleadings, and orders with respect to this proceeding should be directed to the following individuals:

Robert E. Fernandez, Executive Vice President, General Counsel & Chief Compliance Officer
Karen Georgenson Gach, Deputy General Counsel
Raymond Stalter, Director, Regulatory Affairs
*Sara B. Keegan, Assistant General Counsel
*Angela J. Sicker, Attorney II
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
Tel: (518) 356-6000
Fax: (518) 356-4702
rfernandez@nyiso.com
kgach@nyiso.com
rstalter@nyiso.com
skeegan@nyiso.com
asicker@nyiso.com

*Designated to receive service.

III. Discussion

A. Background

Order No. 845 modified the *pro forma* Large Generator Interconnection Agreement and *pro forma* Large Generator Interconnection Procedures to, among other things, require posting of interconnection study processing metrics on a quarterly basis and to file informational reports with the Commission if such metrics exceed the study deadlines for more than 25 percent of any study type for two consecutive quarters.[3] On May 22, 2019, the NYISO filed revisions to its Large Facility Interconnection Procedures ("LFIP"), with certain independent entity variations, to comply with, among other things, the requirements to post interconnection study processing metrics on a quarterly basis and to file an informational report with the Commission in the event certain study metrics exceeded 25 percent for two consecutive calendar quarters.[4] The

[3] Order No. 845 at P 305.
[4] *New York Indep. Sys. Operator, Inc.*, Compliance Filing, Docket No. ER19-1949-000 (May 22, 2019).

Commission accepted the proposed revisions and independent entity variations on February 20, 2020.[5] Such requirements are set forth in Section 30.3.4.2 of Attachment X to the OATT.[6]

In accordance with Section 30.3.4.3 of Attachment X to the OATT, the NYISO posted interconnection study metrics for the first and second quarters of 2020. In those quarters, more than 25 percent of Optional Feasibility Interconnection Studies and System Reliability Impact Studies listed in these metrics exceeded the study durations set forth in Sections 30.3.4.2.1 (E) and 30.3.4.2.2 (E), respectively. As a result, Section 30.3.4.4 of the OATT required the NYISO to, among other things, file a report with the Commission for the next four (4) consecutive calendar quarters describing the reason for each study or group of clustered studies that exceeded the deadline for completion and any steps taken by the NYISO to remedy these specific issues and, if applicable, prevent similar delays in the future. The NYISO must continue to report to the Commission until it reports four consecutive calendar quarters without the calculated values exceeding 25 percent for two consecutive calendar quarters.[7] The NYISO has filed the report for the third and fourth quarters of 2020, the first, second, third, and fourth quarters of 2021, and the first, second, third, and fourth quarters of 2022. The NYISO has filed the report for the first second, and third quarters of 2023. The NYISO now files this report for the fourth quarter of 2023. This informational filing reports the reason(s) for delays without any allowance for Reasonable Efforts.[8]

B. Information on Study Delays

1. Fourth Quarter 2023 Summary Interconnection Study Processing Metrics

The NYISO posted the fourth quarter 2023 interconnection study processing metrics on the publicly available portion of its website.[9] Relevant study processing metrics are summarized as follows:

a. Optional Interconnection Feasibility Study ("FES")

- NYISO completed five FESs that exceeded the applicable study time referenced in Section 30.3.4.2.1 of the OATT.
- NYISO had zero FESs that were ongoing at the end of the fourth quarter of 2023 and exceeded the applicable study time referenced in Section 30.3.4.2.1 of the OATT.

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[5] *New York Indep. Sys. Operator, Inc.*, 170 FERC ¶ 61,117 at PP 60-62 (2020) (accepting the proposed revisions to the NYISO's LFIP to comply with the interconnection study processing metrics requirements of Order No. 845).

[6] For purposes of calculating the length of time of an interconnection study for purposes of the interconnection study processing metrics, the Commission accepted certain independent entity variations related to the commencement and completion of the study, as set forth in Section 30.3.4.2 of the OATT.

[7] OATT § 30.3.4.4.

[8] *Id.*

[9] The NYISO posted the summary interconnection study processing metrics for the fourth quarter of 2023 on October 29, 2023. The summary is available at https://www.nyiso.com/documents/20142/12339243/LF-Interconnection-Study-Metrics-4rd-Quarter-2023-DH-V1-TTN.pdf/c069f9d8-a5db-9240-b640-a4b3b743b27b.

b. System Reliability Impact Study ("SRIS")

- NYISO completed twenty-seven SRISs that exceeded the applicable study time referenced in Section 30.3.4.2.2 of the OATT.
- NYISO had zero SRISs that were ongoing at the end of the fourth quarter of 2023 and exceeded the applicable study time referenced in Section 30.3.4.2.2 of the OATT.

c. Class Year Interconnection Facilities Study ("Class Year Study")

- There are currently zero ongoing incomplete Class Year Studies that exceed the schedule set forth in Section 25.5.9.

The NYISO, Transmission Owners, and applicable third-party consultants expended a total number of 20,577 hours towards interconnection studies for Interconnection Requests seeking to interconnect to the New York State Transmission System (or Distribution System as applicable) during the fourth quarter of 2023.

2. Details on Reasons for Delays for Fourth Quarter of 2023

Attachment A contains a list of Large Facility Interconnection Requests that either completed an interconnection study or have an interconnection study ongoing as of the end of the fourth quarter of 2023 that exceeded the applicable study time under Section 30.3.4.2 of the OATT. For each such Interconnection Request, Attachment A provides an explanation as to the major driver(s) for delay, which is categorized to identify trends across the Interconnection Requests that are the subject of this filing. The reasons for delay are described below for each type of study under the LFIP.

a. Optional Interconnection Feasibility Studies

For the Interconnection Requests undergoing an FES, the identified reasons for delays are categorized into six reasons—many of which apply across multiple projects.[10] Some reasons for delay for the FES for these Interconnection Requests can be attributed to decisions made by the Developer in proposing the project or during the study, including: (i) technical challenges due to the location where the Developer proposed to interconnect the project, (ii) multiple Points of Interconnection ("POI") proposed by the Developer, and (iii) revisions to the project modeling information that the Developer requested during the study. These drivers add to the amount of analysis needed to be completed and the complexity of the FES.

Completion of the FES for one of the Interconnection Requests had delays related to administrative challenges. Two of the Interconnection Requests undergoing a FES were delayed due to technical challenges presented by the Point of Interconnections proposed by the Developer.

[10] *See* Table A of Attachment A.

b. System Reliability Impact Studies

For the Interconnection Requests undergoing an SRIS, the identified reasons for delays are categorized into six reasons that are similar to those identified for the FES.[11] For two of the Interconnection Requests undergoing an SRIS, delays resulted from required revisions to the data or diagrams provided by the Developer—primarily due to discrepancies or insufficient information identified during the study. Similarly, two projects required revisions to the project modeling data resulting from the Developer's request to modify the Interconnection Request after the study was underway. Six of the Interconnection Requests undergoing an SRIS had a delay attributed to technical challenges due to the location and/or configuration of the interconnection as proposed by the Developer.

There were zero delays due to administrative challenges related to, for example, the finalization of specific tasks that consultants or Transmission Owners needed to perform to provide inputs into the study and the sharing of study information. Also, none of the Interconnection Requests undergoing an SRIS had delays related to revisions to the study base cases caused by updates to the system representation to identify the required upgrades. Five of the Interconnection Requests had delays due to the need to complete an ongoing preliminary, non-binding evaluation of deliverability.[12]

Additionally, the interconnection study process metrics detailed in the OATT currently use a 90-calendar-day deadline for the completion of the SRIS.[13] In the revisions to the LFIP accepted by the Commission in January 2020, Section 30.7.4 of the OATT provides an additional 30 calendar days to complete an SRIS that includes a preliminary, non-binding evaluation of deliverability.[14] In the fourth quarter of 2023, five Interconnection Request that underwent a non-binding preliminary deliverability analysis completed their SRISs after the 90-calendar-day deadline but within the 120-calendar-day deadline. Zero Interconnection Requests that had an ongoing SRIS at the end of the fourth quarter of 2023 and were required to undergo a non-binding preliminary deliverability analysis exceeded 90 calendar days but were still within the 120-calendar-day deadline.[15]

c. Class Year Studies

The Class Year Interconnection Facilities Study is performed for a group of projects that have achieved similar interconnection milestones to determine the cumulative impact of such projects to allocate upgrade costs and generate detailed cost estimates that provide reasonable

[11] *See* Table B of Attachment A.
[12] *See* Table B of Attachment A.
[13] *See* OATT § 30.3.4.2.2.
[14] *See New York Indep. Sys. Operator, Inc.*, Letter Order, Docket No. ER20-638-000 (January 31, 2020); *New York Indep. Sys. Operator, Inc.*, Proposed Revisions Regarding Interconnection Process Improvements, Docket No. ER20-638-000 at p 13 (December 19, 2019).
[15] *See Id.*

accuracy on upgrade costs.[16] This study is estimated to take twelve months to complete.[17] The current Class Year Interconnection Facilities Study – Class Year 2023 – commenced on January 12, 2023. Class Year 2023 is currently ongoing.

3. Steps to Remedy Delays

For the above-mentioned delays, the NYISO resolved or is working towards resolution of many of the issues and challenges on a collaborative basis with the Developers and/or other involved entities.

The NYISO's current processing of studies under the LFIP continues to be affected by the significant, sustained growth in the volume of Large Facility Interconnection Requests, developer-initiated changes to the information provided in the Interconnection Requests, and more projects seeking to interconnect in closer proximity to each other. When issues arise, such as an infeasible POI, the tariff allows a Developer the ability to remedy it in most situations. However, the change to the POI, particularly in the Class Year Study, causes cascading effects on the progress of the remaining projects. These factors contribute to the current length of time that is required to complete the studies. The NYISO continues to seek more resources and identify efficiencies to handle the large number of Interconnection Requests, late-stage changes to an Interconnection Request, and the increasing complexity of the interaction among Interconnection Requests. However, many of the challenges in processing Interconnection Requests remain unique to the individual request and will still need to be addressed at the time they are identified.

The NYISO remains committed to improving its interconnection process to reduce the potential for unnecessary delays. For example, the NYISO took steps to expedite SRIS studies by focusing the study scopes on the analyses necessary to evaluate the reliability impacts of an Interconnection Request and eliminating analyses that will be either conducted during the Class Year Interconnection Facilities Study or are simply provided as information. In addition to preparing these focused scopes for Interconnection Requests entering the SRIS, the NYISO sought and obtained approval from the Operating Committee on November 17, 2022, to revise thirty-five scopes for ongoing SRISs with the intended purpose of expediting the completion of those studies. As detailed above and in prior reporting, this measure helped to facilitate a significant increase of SRISs completed during the fourth quarter 2022 and throughout 2023.[18]

In addition to these shorter-term measures, the NYISO has taken a multipronged approach to improving the efficiency of its LFIP. The NYISO kicked off an extensive stakeholder process to solicit feedback and input to implement comprehensive interconnection process improvements in 2023. This effort was in addition to the 2022 initiative in which the NYISO worked with stakeholders to further align the various interconnection procedures to, among other goals, ameliorate bottlenecks that can result from interactions of projects

[16] *See* Table C of Attachment A.

[17] *See* OATT § 25.5.9.1.

[18] In the third quarter of 2022, the NYISO reported completion of 8 SRISs under the study metrics. In contrast, the NYISO reported completing 32 SRISs in the fourth quarter of 2022.

proceeding under different interconnection procedures. The NYISO has also taken additional steps to improve the exchange of information for the study of Interconnection Requests, which include hiring dedicated customer service representatives to interface with interconnection customers and updating the NYISO's interconnection projects portal to enhance the use and sharing of information. The NYISO continues to hold customer support focus groups to elicit feedback and proposals from interested parties on improving the interconnection projects portal experience. Since January 2023, the NYISO has engaged stakeholders to discuss and develop comprehensive interconnection process reforms. On July 28, 2023, the Commission issued Order No. 2023 to address interconnection queue backlogs.

On November 3, 2023, the NYISO submitted a partial Order No. 2023 compliance filing with FERC to establish interim transition procedures that will assist in the overall transition to the cluster study process NYISO plans to propose in its full Order No. 2023 compliance filing. The NYISO continues to vet elements of its Order No. 2023 compliance proposals with stakeholders at its Interconnection Issues Task Force meetings.[19] The Commission issued an Order Granting Waiver on January 25, 2024, which approved the NYISO's request to waive requirements in Articles 30.3, 30.6, 30.7, and 30.10 of the OATT in order to begin to prepare to transition to a new cluster study process that the NYISO plans to submit in compliance with Order No. 2023.[20]

IV. Service

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, a complete copy of this filing will be posted on the NYISO's website at www.nyiso.com, and the NYISO will send an electronic link to this filing to the official representative of each of its customers and to each participant on its stakeholder committees.

[19] Materials and updates on the NYSIO's Interconnection Issues Task Force can be publicly accessed on the NYISO's website Interconnection Issues Task Force - NYISO.

[20] *See New York Indep. Sys. Operator, Inc.*, Order Granting Waiver Request, Docket No. ER24-342-000 (January 25, 2024).

V. Conclusion

Wherefore, the NYISO respectfully requests that the Commission accept this informational filing as required by Section 30.3.4.2 of Attachment X to the OATT.

Respectfully submitted,

/s/ *Angela J. Sicker*
Sara B. Keegan
Angela J. Sicker
Counsel for the New York Independent System Operator, Inc.

cc: Janel Burdick
Emily Chen
Matthew Christiansen
Jignasa Gadani
Jette Gebhart
Leanne Khammal
Jaime Knepper
Kurt Longo
David Morenoff
Douglas Roe
Eric Vandenberg

ATTACHMENT A

Details of Interconnection Study Delays for 4th Quarter of 2023

Consistent with the requirements of Section 30.3.4.2 of its Open Access Transmission Tariff ("OATT") and Order Nos. 845 and 845-A,[1] the New York Independent System Operator, Inc. ("NYISO") posted interconnection study metrics for Quarter 4 of 2023 to its OASIS or a publicly accessible portion of its website. The interconnection study metrics provided summary statistics on the processing of Interconnection Studies for Large Facilities, as well as Interconnection Requests ("IR") for Large Facilities that were withdrawn during the reporting quarter.

Tables A and B below provide the summary of notable drivers for the delayed projects during the quarter.

Table A – Delayed FES as of December 31, 2023

Queue #	Project: Project Name	FES Commenced Date	FES Draft Report for Review Due Date	Primary Driver(s) for Delay
1394	NY Greenport 85 Middle Rd Storage	8/7/2023	12/20/2023	5
1485	Sandlot	8/18/2023	11/22/2023	5
1492	Sidecar Solar	9/21/2023	12/29/2023	4

Notes:

(1) Revisions required to the data and/or diagram provided by the Developer.
(2) Multiple POIs proposed by the Developer resulting in the need for additional analysis.
(3) Project modeling revisions due to Developer's request to modify the project.
(4) Administrative challenges (*e.g.*, technical issues with electronic platform to exchange information among the NYISO, Developer, consultants and/or CTOs, or finalization of project-specified agreement with consultants and/or CTOs for scope of technical work required to study).
(5) Technical challenges due to the POI(s) proposed by the Developer.
(6) Revisions to study base cases due to system representation updates.

[1] *Reform of Generator Interconnection Procedures and Agreements*, Order No. 845, 83 Fed. Reg. 21342 (May 9, 2018), 163 FERC ¶ 61,043 (2018) ("Order No. 845"), *order on clarification and reh'g*, Order No. 845-A, 166 FERC ¶ 61,137 (2019) ("Order No. 845-A"). For convenience, unless otherwise specified, references in this filing to "Order No. 845" encompass Order Nos. 845 and 845-A.

Table B – Delayed SRIS as of December 31, 2023

Queue #	Project: Project Name	SRIS Commenced Date	SRIS Draft Report for Review Due	Primary Driver(s) for Delay
1084	EGC BESS	8/14/2023	12/6/2023	3 & 6
1137	Salt Rush Wind	9/15/2023	12/26/2023	1 & 2
1138	Wintergreen Solar	9/22/2023	12/26/2023	1 & 2
1164	Glenwood BESS	9/12/2023	12/20/2023	3 & 6
1243	Whale Square Energy Storage 2	8/7/2023	11/10/2023	3 & 6
1244	Whale Square Energy Storage 3	8/7/2023	11/13/2023	3 & 6
1245	CBB PARK	9/26/2023	12/29/2023	3 & 6
1249	Ruby Storage Project	8/11/2023	11/14/2023	3

Notes:

(1) Revisions required to the data and/or diagram provided by the Developer.
(2) Project modeling revisions due to Developer's request to modify the project, including, but not limited to, a change in the proposed POI.
(3) Technical challenges due to the POI(s) proposed by the Developer.
(4) Administrative challenges (*e.g.*, technical issues with electronic platform to exchange information among the NYISO, Developer, consultants and/or CTOs, or finalization of project-specified agreement with consultants and/or CTOs for scope of technical work required to study).
(5) Revisions to study base cases due to system representation updates.
(6) Project underwent or undergoing preliminary, non-binding evaluation of deliverability.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 12th day of February, 2024.

/s/ Alexander Morse

Alexander Morse
New York Independent System Operator, Inc.
10 Krey Blvd.
Rensselaer, NY 12144
(518) 356-8854