

November 13, 2020

By Electronic Delivery

Honorable Kimberly D. Bose, 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. ER21-____-000**

Dear Secretary Bose:

The New York Independent System Operator, Inc. (“NYISO”) hereby submits an informational filing containing interconnection study metrics for the third quarter of 2020 pursuant to Section 30.3.4.4 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 Third Quarter of 2020

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
Karen Georgenson Gach, Deputy General Counsel
Raymond Stalter, Director, Regulatory Affairs
*Sara B. Keegan, Senior Attorney
*Brian R. Hodgdon, Senior Attorney

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.

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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 interconnections 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 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 30.3.4.2 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)

³ Order No. 845 at P 305.

⁴ *New York Indep. Sys. Operator, Inc.*, Compliance Filing, Docket No. ER19-1949-000 (May 22, 2019).

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.

and 30.3.4.2.2 (E), respectively.⁷ As a result, Section 30.3.4.4 of the OATT requires 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. This informational filing reports the reason(s) for delays without any allowance for Reasonable Efforts.⁸

B. Information on Study Delays

1. Third Quarter 2020 Summary Interconnection Study Processing Metrics

On October 30, 2020, the NYISO posted the third quarter 2020 interconnection study processing metrics on the publicly available portion of its website.⁹ Relevant study processing metrics are summarized as follows:

Optional Interconnection Feasibility Studies (“FES”)

- NYISO completed four (4) FES that exceeded the applicable study time referenced in Section 30.3.4.2.1 of the OATT.

System Reliability Impact Study (“SRIS”)

- NYISO completed ten (10) SRIS that exceeded the applicable study time referenced in Section 30.3.4.2.2 of the OATT.
- Sixteen (16) SRIS that were ongoing at the end of the third quarter of 2020 exceeded the applicable study time referenced in Section 30.3.4.2.2 of the OATT.

Class Year Interconnection Facilities Study (“Class Year Study”)

- NYISO completed a Class Year Study as a clustered study for thirty-seven (37) Large Facility Interconnection Requests seeking Energy Resources Interconnection Service and/or Capacity Resource Interconnection Service.
- While completed in the third quarter of 2020 for purposes of the interconnection study metrics, the Class Year Study, known as “Class Year 2019,” exceeded the time period set forth in Section 25.5.5.9 of Attachment S to the OATT.

⁷ The interconnection study metrics for quarters 1 and 2 of 2020 are posted to the publicly available portion of the NYISO’s and can be accessed at <https://www.nyiso.com/documents/20142/12339243/LF-Interconnection-Study-Metrics-1st-Quarter-2020.pdf/9afc186f-f728-51c6-299c-31766496350f> and <https://www.nyiso.com/documents/20142/12339243/LF-Interconnection-Study-Metrics-2nd-Quarter-2020.pdf/779ce8f9-e5eb-94a7-1270-0639df61c7fd>, respectively.

⁸ See OATT § 30.3.4.4.

⁹ The interconnection study metrics for the third quarter of 2020 are available at: <https://www.nyiso.com/documents/20142/12339243/LF-Interconnection-Study-Metrics-3rd-Quarter-2020.pdf/cd7a61f1-92a5-6c0e-c4b4-6719164ee6cf>.

The NYISO, Connecting Transmission Owners, and applicable third-party consultants expended a total number of 9,145 hours towards interconnections studies for Interconnection Requests seeking to interconnect to the New York State Transmission System (or Distribution System as applicable) during the third quarter of 2020.

2. Details on Reasons for Delays

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 third quarter of 2020 that exceeded the applicable study time. Each Interconnection Request has 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 Optional Interconnection Feasibility Studies, the identified reasons for delays can be categorized into six reasons—many of which apply across multiple projects.¹⁰ For three of the Interconnection Requests, one of the drivers of delay was attributed to required revisions to the data and/or diagrams provided by the Developer due to discrepancies or insufficient information identified during the course of the study. Other reasons for delay that can be attributed to decisions made by the Developer in proposing the project or during the course of the study include (i) technical challenges due to the location where the Developer proposed to interconnect the project, (ii) multiple Points of Interconnection proposed by the Developer, and (iii) revisions to the project modeling information that the Developer requested during the course of the study. All of these drivers add to the amount of analysis needed to be completed and the complexity of the studies.

Completion of the FES for three of the Interconnection Requests was delayed due to administrative challenges. Such challenges ranged from technical difficulties with the electronic platforms used to exchange data among the entities involved in the study to delays in finalizing the specific tasks required of consultants or Connecting Transmission Owners for inputs into the study. One Interconnection Request was delayed due in part to revisions to the study base cases caused by updates to the system representation in order to identify the required upgrades.

b. System Reliability Impact Studies

For the System Reliability Impact Studies, the identified reasons for delays are categorized into six reasons that are largely similar to those identified for the Optional Interconnection Feasibility Studies.¹¹ For 12 of the Interconnection Requests undergoing a 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 course of the study. Similarly, 17 projects required revisions to the project modeling data

¹⁰ See Table A of Attachment A.

¹¹ See Table B of Attachment A.

resulting from the Developer's request to modify the Interconnection Request following the start of the study. The proposed changes to the Interconnection Requests varied, and for two projects, the Developers proposed a change to the proposed interconnection location. Nine of the SRISs had a delay attributed to technical challenges due to the proposed location of the interconnection selected by the Developer.

Eleven SRISs were delayed due to administrative challenges related to the electronic information-sharing platforms and finalization of specific tasks that consultants or Connecting Transmission Owners needed to perform to provide inputs into the Study. Eight SRISs were delayed due in part to revisions to the study base cases caused by updates to the system representation in order to identify the required upgrades.

Additionally, the interconnection study process metrics detailed in the OATT currently use a 90-calendar day deadline for the completion of the SRIS.¹² In revisions to the Large Facility Interconnection Procedures accepted by the Commission in January 2020, Section 30.7.4 of the OATT provides an additional 30 calendar days for SRISs that include a preliminary, non-binding evaluation of deliverability.¹³ For the third quarter of 2020, two SRISs that underwent a preliminary, non-binding evaluation of deliverability were completed within the 120-calendar day deadline but in excess of the 90 calendar days.¹⁴ Four SRISs that were ongoing at the end of the third quarter for 2020 and were required to undergo a non-binding preliminary deliverability analysis that exceeded the 90 calendar days but were still within in the 120-calendar day deadline.¹⁵

c. Class Year Interconnection Facilities 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 in order to equitably allocate upgrade costs and generate detailed cost estimates that provide reasonable accuracy on upgrade costs. This study is estimated to take twelve months to complete. On September 25, 2020, the NYISO provided the initial draft of the 2019 Class Year Study report to stakeholders, marking the completion of the study for purposes of these interconnection study processing metrics—approximately 13.5 months after the commencement of the study.¹⁶ Class Year 2019 was an extensive study that began with 39 projects being studied for Energy Resource Interconnection Services (“ERIS”) and/or Capacity Resource

¹² See OATT § 30.3.4.2.2.

¹³ 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).

¹⁴ See Table B of Attachment A.

¹⁵ See *id.*

¹⁶ See OATT § 30.3.4.2.3.

Interconnection Service (“CRIS”)¹⁷ and 52 projects seeking only CRIS and ended with 38 projects being studied for ERIS and/or CRIS and 40 projects seeking only CRIS.

As reported in Attachment A, the drivers that resulted in the delay to the completion of the Class Year Study included rework due to a number of Interconnection Requests and CRIS-only requests withdrawing after the commencement of the study and technical challenges in performing the study with such a large number of Class Year Projects that ranged in complexity based on the nature of the project and the proposed location of interconnection.¹⁸

3. Steps to Remedy Delays

The NYISO continues to evaluate process enhancements that will limit unnecessary delays in performing interconnection studies under its LFIP. For the above-mentioned delays, the NYISO resolved the issues and challenges on a collaborative basis with the Developer and/or other involved entities without the need for dispute resolution or the involvement of the Commission. It is important to note that the delays discussed in Attachment A and above are without accounting for an allowance of Reasonable Efforts and, therefore, capture common issues that will arise in studying proposed interconnections to a complex transmission system.

However, given the influx of projects entering its Interconnection Queue, the NYISO continues to engage Developers by educating them on the LFIP and ensuring open lines of communication among the parties engaged in the various interconnection studies. For example, the NYISO is in the process of updating its Transmission Expansion and Interconnection Manual to provide easier access for Developers to understand the NYISO’s interconnection process. Additionally, the NYISO is preparing Frequently Asked Questions and a tutorial for navigating the LFIP that will provide more information to avoid unnecessary delays attributed to insufficient information or changes to the Interconnection Request during an ongoing study. The NYISO remains open to feedback from stakeholders for process improvements that may further reduce the potential for unnecessary delays. The NYISO, in conjunction with the Transmission Owners, continues to work to streamline the process by evaluating and improving coordination of administrative-type tasks, such as consultant agreements and coordination of study analyses for inputs into the various studies. However, many of the challenges are specific to individual Interconnection Requests, and will still need to be addressed at the time they are identified.

IV. Service

The NYISO will send an electronic link to this filing to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, a complete

¹⁷ Class Year 2019 contained 37 Large Facility Interconnection Requests being processed under the LFIP and one (1) Interconnection Request that was initiated in the Small Generator Interconnection Procedures under Attachment Z. Due to the nature of the required System Upgrade Facility, Section 32.3.5.3.2 of the OATT required the Small Generator Interconnection Request to complete its facilities study through the Class Year Study, but was not accounted for in the interconnection study process metrics under the LFIP.

¹⁸ See Table C of Attachment C.

copy of the documents included with this filing will be posted on the NYISO's website at www.nyiso.com.

V. Conclusion

Wherefore, the NYISO respectfully requests that the Commission accept this informational filing as required by Section 30.2.4.3 of Attachment X to the OATT.

Respectfully submitted,

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ATTACHMENT A

Details of Interconnection Study Delays for Third Quarter of 2020

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 3 of 2020 to its OASIS or a publicly accessible portion of its website. The interconnection study metrics provide 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, B and C below provide the summary of notable drivers for the delayed projects during the third quarter of 2020.

Table A – Delayed Optional Interconnection Feasibility Studies (“FES”) as of September 30, 2020

Queue #	Project: Project Name	FES Commenced Date	FES Draft Report Completion Date	Primary Driver(s) for Delay
0788	Atlantic Shores Offshore Wind 7	11/21/2019	7/29/2020	1, 3, 4 & 6
0866	North Country Wind	3/10/2020	7/21/2020	2 & 5
0902	Yacht Club Energy Storage	1/26/2020	8/3/2020	1 & 4
0903	Goethals Energy Storage	1/26/2020	8/3/2020	1 & 4

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
- (3) Technical challenges due to the Point of Interconnection(s) (“POI”) proposed by the Developer
- (4) Administrative challenges (*e.g.*, technical issues with electronic platform to exchange information, or finalization of project-specified agreements 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) Multiple POIs proposed by the Developer resulting in the need for additional analysis

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 System Reliability Impact Study (“SRIS”) as of September 30, 2020

Queue #	Project: Project Name	SRIS Commenced Date	SRIS Draft Report Completion Date	Primary Driver(s) for Delay
0789	Atlantic Shores Offshore Wind 8	9/19/2019	7/1/2020	1, 2 & 3
0790	Atlantic Shores Offshore Wind 9	8/1/2019	7/20/2020	4 & 5
0825	Setauket Energy Storage	5/12/2020	9/30/2020	4
0830	Astoria Energy Storage 2	12/17/2019	9/4/2020	1 & 5
0834	Parking Lot Battery Energy Storage	3/27/2020	9/30/2020	1
0835	Dock Battery Energy Storage	3/27/2020	9/30/2020	1
0840	Swiftsure Energy Storage	10/21/2019	7/29/2020	1, 4 & 5
0878	Pirates Island	4/17/2020	9/30/2020	2
0907	Harlem River Yard	5/28/2020	9/22/2020	2 & 6
0931	Astoria Energy Storage	5/28/2020	9/10/2020	2 & 6
0680	Long Island Offshore Wind	1/10/2020	Ongoing	1, 2 & 5
0792	Long Island Offshore Wind Connection	12/17/2019	Ongoing	1, 2 & 5
0801	Prattsburgh Wind Farm	3/27/2020	Ongoing	2 & 3
0858	Genesee Road Solar Energy Center	4/20/2020	Ongoing	3
0864	NY38 Solar	10/21/2019	Ongoing	1 & 2
0883	Garnet Energy Center	6/25/2020	Ongoing	2 & 3
0929	Morris Ridge Battery Storage	4/17/2020	Ongoing	4 & 5
0939	Far Rockaway Power Station BESS	6/25/2020	Ongoing	3, 4 & 6
0950	Orleans Solar	5/12/2020	Ongoing	1, 2, 4 & 5
0954	Empire Solar	6/17/2020	Ongoing	2, 3 & 5
0958	EI Oceanside	4/27/2020	Ongoing	1, 2, 3 & 4
0959	EI Oceanside 2	4/27/2020	Ongoing	1, 2, 3 & 4
0965	Yaphank Energy Storage	6/29/2020	Ongoing	2, 4 & 6
0967	KCE NY 5	6/17/2020	Ongoing	1, 2 & 4
0971	East Setauket Energy Storage	6/29/2020	Ongoing	2, 4 & 6
0994	KCE NY 22	6/17/2020	Ongoing	2, 3 & 6

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, or finalization of project-specified agreements 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 is undergoing preliminary, non-binding evaluation of deliverability

Table C – Delayed Class Year 2019 Study as of September 30, 2020

Queue #	Study Name	CYS Start Date	CYS Draft Report Completion Date	Primary Driver(s) for Delay
CY19	Class Year 2019 Study	8/9/2019	9/22/2020	1 & 2

Note:

- (1) Revisions to study base cases due to projects that dropped out
- (2) Technical challenges due to a large number of Class Year members