

May 13, 2022

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. ER19-1949-000**

Dear Secretary Bose:

The New York Independent System Operator, Inc. (“NYISO”) hereby submits an informational filing containing interconnection study metrics for the first quarter of 2022 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 First Quarter of 2022.

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
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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 30.3.4.3 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.⁷ 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

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.

⁷ The interconnection study metrics for the first and second quarters of 2020 are posted to the publicly available portion of the NYISO’s website 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.

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.⁸ The NYISO has filed the report for the third and fourth quarters of 2020 and the first, second, third, and fourth quarters of 2021. The NYISO now files this report for the first quarter of 2022. This informational filing reports the reason(s) for delays without any allowance for Reasonable Efforts.⁹

B. Information on Study Delays

1. First Quarter 2022 Summary Interconnection Study Processing Metrics

The NYISO posted the first quarter 2022 interconnection study processing metrics on the publicly available portion of its website.¹⁰ Relevant study processing metrics are summarized as follows:

Optional Interconnection Feasibility Study (“FES”)

- NYISO completed one FES that exceeded the applicable study time referenced in Section 30.3.4.2.1 of the OATT.
- NYISO had six FESs that were ongoing at the end of the first quarter of 2022 and exceeded the applicable study time referenced in Section 30.3.4.2.1 of the OATT.

System Reliability Impact Study (“SRIS”)

- NYISO completed 10 SRISs that exceeded the applicable study time referenced in Section 30.3.4.2.2 of the OATT.
- NYISO had forty-two SRISs that were ongoing at the end of the first quarter of 2022 and 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 has an ongoing Class Year Study with 49 Large Facility Interconnection Requests seeking Energy Resources Interconnection Service and/or Capacity Resource Interconnection Service (“CRIS”) that exceeded the applicable study time referenced in Section 30.3.4.2.3 of the OATT.

The NYISO, Transmission Owners, and applicable third-party consultants expended a total number of 11,392 hours towards interconnections studies for Interconnection Requests

⁸ OATT § 30.3.4.4.

⁹ *Id.*

¹⁰ The NYISO posted the summary interconnection study processing metrics for the first quarter of 2022 on April 29, 2022. The summary is available at <https://www.nyiso.com/documents/20142/12339243/LF-Interconnection-Study-Metrics-1st-Quarter-2022.pdf/8917e957-84c4-a57c-31f4-94de05302392>.

seeking to interconnect to the New York State Transmission System (or Distribution System as applicable) during the first quarter of 2022.

2. Details on Reasons for Delays for First Quarter of 2022

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 first quarter of 2022 that exceeded the applicable study time under Section 30.3.4.2 of the OATT. 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 Interconnection Requests undergoing a FES, the identified reasons for delays are categorized into six reasons—many of which apply across multiple projects.¹¹ 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 study. Other reasons for delay for the interconnection requests 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 (“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 five of the Interconnection Requests had delays related to administrative challenges. One of the Interconnection Requests undergoing a FES was delayed due to technical challenges presented by the Point of Interconnections proposed by the Developer, and one was delayed due, in part, to revisions to the study base cases to incorporate changes to the system representation.

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.¹² For 20 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, eight projects required revisions to the project modeling data 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, including, among other things, modifications to the configuration of the project(s) and a change to a proposed Point of Interconnection. Twelve of the Interconnection Requests undergoing an

¹¹ See Table A of Attachment A.

¹² See Table B of Attachment A.

SRIS had a delay attributed to technical challenges due to the proposed location of the interconnection selected by the Developer.

Completion of the SRIS for 32 of the Interconnection Requests was delayed due to administrative challenges related to, for example, the electronic information-sharing platforms and finalization of specific tasks that consultants or Transmission Owners needed to perform to provide inputs into the study. Twenty-five 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. Fourteen of the Interconnection Requests had delays due to the need to complete an ongoing preliminary, non-binding evaluation of deliverability.¹³

Additionally, the interconnection study process metrics detailed in the OATT currently use a 90-calendar-day deadline for the completion of the SRIS.¹⁴ 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.¹⁵ In the first quarter of 2022, one Interconnection Request that underwent a non-binding preliminary deliverability analysis completed its SRIS after the 90-calendar-day deadline but within the 120-calendar-day deadline. Two Interconnection Requests that were ongoing at the end of the first quarter of 2022 and required to undergo a non-binding preliminary deliverability analysis exceeded 90 calendar days but were still within in the 120-calendar-day deadline.¹⁶

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 accuracy on upgrade costs.¹⁷ This study commenced on March 11, 2021 and is estimated to take twelve months to complete. Class Year 2021 is an extensive study that contains 54 Interconnection Requests for Energy Resource Interconnection Services (“ERIS”) and/or CRIS and three requests seeking only CRIS. Of the 54 Interconnection Requests seeking ERIS and/or CRIS, 49 are Large Facilities Interconnection Requests being processed under the LFIP.¹⁸

¹³ See Table B of Attachment A.

¹⁴ See OATT § 30.3.4.2.2.

¹⁵ 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).

¹⁶ See *id.*

¹⁷ See Table C of Attachment A.

¹⁸ Five (5) interconnection requests in Class Year 2021 were 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 these Small Generator Interconnection Requests to complete their facilities studies through the Class Year Study. These Small Generator Interconnection Requests are not accounted for in the interconnection study process metrics under the LFIP.

As reported in Attachment A, the drivers that resulted in the delay in the Class Year Study included rework due to data and/or diagrams provided by the Developers of a number of Interconnection Requests and CRIS-only requests, as well as revisions to study base cases due to applicable system representation upgrades. Additionally, delays resulted from technical challenges due to POIs for certain Interconnection Requests and modeling revisions in response to Developer requests to modify the proposed POIs for certain Interconnection Requests.

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 without the need for dispute resolution or the involvement of the Commission. It is also important to note that the delays discussed in Attachment A and above are without accounting for an allowance of Reasonable Efforts. Therefore, they include common issues that will arise in studying proposed interconnections to a complex transmission system.

The NYISO's current processing of studies under the LFIP has also been affected by the significant, sustained growth in the volume of Large Facility Interconnection Requests. Additionally, more projects seek to interconnect in closer proximity to each other, resulting in added complexity in the studies. Both 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 and the increasing complexity of studies.

In April 2022, the NYISO also began implementing improvements to its communication with Developers to provide greater access to and additional transparency regarding project status via its Interconnection Projects Portal. These improvements will allow Developers 24-hour access to additional project information to better understand the up-to-date status of their Interconnection Requests.

The NYISO remains open to feedback from stakeholders for process improvements that may further reduce the potential for unnecessary delays. 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 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.

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VI. 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/ Brian R. Hodgdon

Sara B. Keegan

Brian R. Hodgdon

*Counsel for the New York Independent System
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ATTACHMENT A

Details of Interconnection Study Delays for 1st Quarter of 2022

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 1 of 2022 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, B and C below provide the summary of notable drivers for the delayed projects during the quarter.

Table A – Delayed FES as of March 31, 2022

Queue #	Project: Project Name	FES Commenced Date	FES Draft Report for Review Due Date	Primary Driver(s) for Delay
0940	Glenwood Power Station BESS	8/19/2020	On-going	1, 2, 4 & 6
1037	East Sayre ESS	7/26/2021	On-going	4
1087	East Wind 1	4/30/2021	On-going	1, 2, 4 & 5
1137	Orangeville Solar	7/28/2021	On-going	4
1138	Wintergreen Solar	7/23/2021	On-going	4
1146	Champlain Solar	11/1/2021	On-going	1 & 3

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 March 31, 2022

Queue #	Project: Project Name	SRIS Commenced Date	SRIS Draft Report for Review Due	Primary Driver(s) for Delay
0785	Erie-Wyoming County Solar	7/13/2021	On-going	3 & 4
0852	Niagara Dolomite Solar	6/30/2021	On-going	4 & 6
0866	North Country Wind	2/9/2021	On-going	1 & 4
0869	Tabletop Solar	4/30/2021	On-going	4 & 5
0871	Verona Solar Energy Center I	1/20/2021	On-going	1 & 4
0873	Verona Solar Energy Center II	1/20/2021	On-going	1 & 4
0951	Cayuga Grid, LLC	7/28/2020	On-going	1, 3, 4 & 5
1004	Mifflin	3/15/2021	On-going	1, 2, 4 & 5
1009	Yellow Barn Solar	10/16/2020	On-going	1, 4 & 5
1010	Vineyard Wind I	4/2/2021	On-going	1, 3, 5 & 6
1012	Suffolk County Storage II	7/23/2021	On-going	3, 5 & 6
1013	Barrett Ridge Energy – PARs	10/12/2020	On-going	1, 2, 3 & 5
1016	EI Steinway 1	12/1/2021	On-going	1, 2, 3 & 6
1017	EI Steinway 2	12/1/2021	On-going	1, 2, 3 & 6
1021	EI East Shoreham	6/30/2021	On-going	1, 2, 3, 4 & 6
1031	Mill Point Solar	1/8/2021	On-going	3 & 5
1040	Riverline Energy Center	4/2/2021	On-going	4
1041	Silverline Energy Center	1/21/2021	On-going	4 & 5
1042	Fort Edward Solar Farm (NY53)	6/30/2021	On-going	1, 3 & 5
1045	NY Wind Holbrook 2 Uprate	1/21/2021	On-going	3, 5 & 6
1046	Barrett Energy Storage Center	2/9/2021	On-going	1, 5 & 6
1048	Declaration Energy Center	7/26/2021	On-going	4
1049	Holbrook Energy Center	5/12/2021	On-going	1, 4, 5 & 6
1050	Holtsville Energy Center	4/16/2021	On-going	1, 4, 5 & 6
1055	Addison Solar Project	11/1/2021	On-going	4 & 5
1068	Buchanan Point BESS	10/1/2021	On-going	4 & 6
1080	Mineral Basin Solar Power	5/12/2021	On-going	4 & 5
1086	Buchanan Point BESS II	10/1/2021	On-going	4 & 6
1088	Harvest Hills Solar	1/21/2021	On-going	1, 4 & 5
1089	Flat Creek Solar	9/21/2021	On-going	3
1096	Allegany 2 Solar	4/30/2021	On-going	1 & 4
1103	Thousand Island Solar	5/26/2021	On-going	1, 2 & 4
1107	Buchanan Point BESS III	10/5/2021	On-going	4 & 5
1114	Wading River Energy Center	5/26/2021	On-going	2, 4 & 6
1136	Honey Ridge Solar	11/1/2021	On-going	4 & 5
1142	Minerva BESS I	9/21/2021	On-going	1, 2, 4, 5 & 6
1148	Agricola Wind Project	11/11/2021	On-going	1 & 4
1150	Moss Ridge Solar	10/1/2021	On-going	4 & 5

1151	York Run Solar	11/1/2021	On-going	4 & 5
1153	Wood Street Battery Storage	10/1/2021	On-going	4 & 5
1160	Arcade Solar	11/16/2021	On-going	4 & 5
1180	BPUS Generation Development, LLC	11/11/2021	On-going	4 & 5

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.

Table C – Delayed Class Year (CY) Studies as of March 31, 2022

Queue #	Project: Project Name	CY Commenced Date	CY Draft Report for Review Due	Primary Driver(s) for Delay
521	Bull Run II Wind	3/11/2021	On-going	1 & 4
522	NYC Energy	3/11/2021	On-going	1, 3 & 4
571	Heritage Wind	3/11/2021	On-going	1, 3 & 4
629	Silver Lake Solar	3/11/2021	On-going	1, 3 & 4
631	NS Power Express	3/11/2021	On-going	1, 3 & 4
700	Robinson Grid	3/11/2021	On-going	1 & 4
709	Alder Creek Solar	3/11/2021	On-going	1, 3 & 4
710	Horseshoe Solar	3/11/2021	On-going	1, 3 & 4
716	Moraine Solar Energy Center	3/11/2021	On-going	1 & 4
717	Morris Ridge Solar Energy Center	3/11/2021	On-going	1 & 4
740	Oakdale Battery Storage	3/11/2021	On-going	1, 3 & 4
758	Sithe Independence	3/11/2021	On-going	1 & 4
766	NY Wind Holbrook	3/11/2021	On-going	1, 3 & 4
774	Tracy Solar Energy Centre	3/11/2021	On-going	1, 3 & 4
777	White Creek Solar	3/11/2021	On-going	1 & 4
783	South Ripley Solar	3/11/2021	On-going	1, 3 & 4
787	Levy Grid, LLC	3/11/2021	On-going	1, 3 & 4
801	Prattsburgh Wind Farm	3/11/2021	On-going	1 & 4
805	Oxbow Hill Solar	3/11/2021	On-going	1, 3 & 4
811	Cider Solar	3/11/2021	On-going	1 & 4
815	Bayonne Energy Center III	3/11/2021	On-going	1 & 4

822	Whale Square Energy Storage 1	3/11/2021	On-going	1 & 4
830	Astoria Energy Storage 2	3/11/2021	On-going	1 & 4
834	Luyster Creek Energy Storage 2	3/11/2021	On-going	1 & 4
835	Luyster Creek Energy Storage 1	3/11/2021	On-going	1 & 4
840	Swiftsure Energy Storage	3/11/2021	On-going	1 & 4
864	NY38 Solar	3/11/2021	On-going	1, 3 & 4
878	Pirates Island	3/11/2021	On-going	1, 3 & 4
880	Brookside Solar	3/11/2021	On-going	1 & 4
881	New Bremen Solar	3/11/2021	On-going	1, 3 & 4
882	Riverside Solar	3/11/2021	On-going	1, 3 & 4
883	Garnet Energy Center	3/11/2021	On-going	1, 3 & 4
887	CH Uprate	3/11/2021	On-going	1, 3 & 4
907	Harlem River Yard	3/11/2021	On-going	1 & 4
925	Clermont 1	3/11/2021	On-going	1 & 4
929	Morris Ridge Battery Storage	3/11/2021	On-going	1 & 4
931	Astoria Energy Storage	3/11/2021	On-going	1 & 4
942	KCE NY 21	3/11/2021	On-going	1 & 4
950	Orleans Solar	3/11/2021	On-going	1, 3 & 4
953	Sugar Maple Solar	3/11/2021	On-going	1, 3 & 4
954	Empire Solar	3/11/2021	On-going	1, 3 & 4
956	Holtsville 138kV Energy Storage	3/11/2021	On-going	1 & 4
958	EI Oceanside	3/11/2021	On-going	1, 2, 3 & 4
959	EI Oceanside 2	3/11/2021	On-going	1, 2, 3 & 4
965	Yaphank Energy Storage	3/11/2021	On-going	1 & 4
967	KCE NY 5	3/11/2021	On-going	1 & 4
987	NY Wind Holbrook 2	3/11/2021	On-going	1, 3 & 4
994	KCE NY 22	3/11/2021	On-going	1 & 4
995	Alabama Solar Park LLC	3/11/2021	On-going	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 projects' proposed POI
- (3) Technical challenges due to the POI(s) proposed by the Developer
- (4) Revisions to study base cases due to applicable system representation updates

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 13th day of May 2022.

/s/ Mitchell W. Lucas

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