

November 14, 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 third 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 Third 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
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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. 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

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.

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 and second quarters of 2022. The NYISO now files this report for the third quarter of 2022. This informational filing reports the reason(s) for delays without any allowance for Reasonable Efforts.⁸

B. Information on Study Delays

1. Third Quarter 2022 Summary Interconnection Study Processing Metrics

The NYISO posted the third quarter 2022 interconnection study processing metrics on the publicly available portion of its website.⁹ Relevant study processing metrics are summarized as follows:

Optional Interconnection Feasibility Study (“FES”)

- NYISO completed three FESs that exceeded the applicable study time referenced in Section 30.3.4.2.1 of the OATT.
- NYISO had four FESs that were ongoing at the end of the third 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 8 SRISs that exceeded the applicable study time referenced in Section 30.3.4.2.2 of the OATT.
- NYISO had thirty-eight SRISs that were ongoing at the end of the third 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 14,017 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 2022.

⁷ OATT § 30.3.4.4.

⁸ *Id.*

⁹ The NYISO posted the summary interconnection study processing metrics for the third quarter of 2022 on October 28, 2022. The summary is available at <https://www.nyiso.com/documents/20142/12339243/LF-Interconnection-Study-Metrics-3rd-Quarter-2022.pdf/392a3e9a-35a0-5f6c-f41e-f401d5269030>.

2. Details on Reasons for Delays for Third 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 third quarter of 2022 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 For two 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 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 four of the Interconnection Requests had delays related to administrative challenges. One of the Interconnection Requests undergoing a FES were delayed due to technical challenges presented by the Points of Interconnection proposed by the Developer.

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 17 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, 13 projects required revisions to the project modeling data resulting from the Developer’s request to modify the Interconnection Request after the study was underway. 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, often where the Developer opted to forego an Optional FES that, may have identified the physical infeasibility of the proposed POI/configuration. Five of the Interconnection Requests undergoing an SRIS had a delay attributed to technical

¹⁰ See Table A of Attachment A.

¹¹ See Table B of Attachment A.

challenges due to the location and/or configuration of the interconnection as proposed by the Developer.

Completion of the SRIS for 31 of the Interconnection Requests was delayed 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. Twenty 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. Eleven of the Interconnection Requests had delays due to the need to complete an ongoing preliminary, non-binding evaluation of deliverability.¹²

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.¹³ This study is estimated to take twelve months to complete.¹⁴ The current Class Year Interconnection Facilities Study – Class Year 2021 – commenced on March 11, 2021. 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.¹⁵

As reported in Attachment A, the drivers that resulted in the delay in Class Year 2021 included rework due to data and/or diagrams provided by the Developers for a number of Interconnection Requests and CRIS-only requests, as well as revisions to study base cases due to applicable system representation upgrades. Additionally, 24 Interconnection Requests were delayed due to technical challenges related to their proposed POIs and/or configurations. Two of the Interconnection Requests were delayed due to modeling revisions in response to the Developer’s request to modify the proposed POIs.

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.

¹² See Table B of Attachment A.

¹³ See Table C of Attachment A.

¹⁴ See OATT § 25.5.9.1.

¹⁵ 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.

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 instance, the NYISO has recently taken steps to expedite SRIS studies by focusing the study scopes on the analyses necessary to evaluate the reliability impacts of an Interconnection Request through 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 is also seeking 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.

The NYISO's efforts also include a 2022 initiative currently underway in which the NYISO is working with stakeholders to further align the various interconnection procedures to, among other goals, ameliorate bottlenecks that can result from interactions of projects proceeding under different interconnection procedures. The NYISO has 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 first customer support focus group to elicit feedback and proposals from interested parties on improving the interconnection projects portal experience will be held on November 14, 2022.

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.

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/ 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 3rd 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 3 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 September 30, 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	8/19/2020	1, 2, 4, & 6
1146	Champlain Solar	11/1/2021	7/22/2022	1 & 4
1234	Horseblock Energy Storage	5/31/2022	7/20/2022	4
1037	East Sayre ESS	7/26/2021	On-going	4 & 5
1108	Bangor Solar	4/12/2022	On-going	2 & 4
1192	OW Ocean Winds East 6	4/22/2022	On-going	1, 2, & 4
1193	OW Ocean Winds East 5	4/22/2022	On-going	1 & 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 September 30, 2022

Queue #	Project: Project Name	SRIS Commenced Date	SRIS Draft Report for Review Due	Primary Driver(s) for Delay
0951	Cayuga Grid, LLC	7/28/2020	7/8/2022	1, 3, 4, & 5
1010	Vineyard Wind I	4/2/2021	9/30/2022	1, 3, 5, & 6
1012	Suffolk County Storage II	7/23/2021	7/18/2022	3, 5, & 6
1016	EI Steinway 1	12/1/2021	9/2/2022	1, 2, 3, & 6
1017	EI Steinway 2	12/1/2021	9/30/2022	1, 2, 3, & 6
1040	Riverline Energy Center	4/2/2021	7/18/2022	4
1042	Fort Edward Solar Farm (NY53)	6/30/2021	9/16/2022	1, 3, 4, & 5
1055	Addison Solar Project	11/1/2021	9/30/2022	1, 4, & 5
0785	Erie-Wyoming County Solar	7/13/2021	On-going	3 & 4
0826	Astoria Energy Storage 1	4/5/2022	On-going	1, 4, & 6
0866	North Country Wind	2/9/2021	On-going	1, 2, 3, & 4
0873	Verona Solar Energy Center II	1/20/2021	On-going	1, 3, & 4
1008	KCE NY 26	2/3/2022	On-going	5 & 6
1011	Vineyard Wind II	5/24/2022	On-going	5 & 6
1013	Barrett Ridge Energy – PARs	10/12/2020	On-going	1, 2, 3, & 5
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
1041	Silverline Energy Center	1/21/2021	On-going	4 & 5
1048	Declaration Energy Center	7/26/2021	On-going	4
1068	Buchanan Point BESS	10/1/2021	On-going	4, 5, & 6
1086	Buchanan Point BESS II	10/1/2021	On-going	4, 5, & 6
1103	Thousand Island Solar	5/26/2021	On-going	1, 2, & 4
1114	Wading River Energy Center	5/26/2021	On-going	2, 4, & 6
1115	Flat Creek Solar 2	4/1/2022	On-going	2, 4, & 6
1116	Blue Hill Wind	4/22/2022	On-going	1 & 4
1122	East Fishkill	5/17/2022	On-going	1, 5, & 6
1123	KCE NY 29	3/7/2022	On-going	1 & 4
1136	Honey Ridge Solar	11/1/2021	On-going	4 & 5
1139	Seventy-Seven Solar	3/7/2022	On-going	4
1141	Twinleaf Solar	6/23/2022	On-going	4
1142	Minerva BESS I	9/21/2021	On-going	1, 2, 4, & 5
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	1, 2, 4 & 5
1174	NY48 - Diamond Solar	5/6/2022	On-going	4
1178	NY115 - Newport Solar	6/20/2022	On-going	1, 2, & 4

1180	BPUS Generation Development, LLC	11/11/2021	On-going	4 & 5
1188	North Seneca Solar Project, LLC	3/7/2022	On-going	4 & 5
1194	Crane Brook Solar Project, LLC	4/5/2022	On-going	4 & 5
1236	Gravel Road Solar	6/20/2022	On-going	5
1240	Gowanus Bay Energy Storage 1	5/17/2022	On-going	1, 2, 4, & 6
1241	Gowanus Bay Energy Storage 2	5/17/2022	On-going	1, 2, 4, & 6
1260	St. Regis River	6/20/2022	On-going	1, 2, 4, & 5
1288	CPNY-X	4/22/2022	On-going	1, 4, 5, & 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 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 September 30, 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 14th day of November 2022.

/s/ Mitchell W. Lucas

Mitchell W. Lucas
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