New York ISO
Independent System Operator

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NYISO Comments on Draft Proposed Reliability Rule 155 – Establish Minimum Interconnection Standards for Large Inverter based Resource (IBR) Generating Facilities Based on IEEE Standard 2800-2022

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The New York Independent System Operator, Inc. ("NYISO") appreciates the opportunity to comment on the New York State Reliability Council's ("NYSRC") Proposed Reliability Rule ("PRR") 155. The NYISO respectfully submits the following comments regarding PRR 155.

The NYISO recommends that Measure M2 be revised to require the NYISO to report on the progress of the applicable attestations, recognizing that the three separate attestations occur at different development stages of a Large IBR Generating Facility and can result in distinctly different timelines for each facility. To address this concern, the NYISO proposes the following change to Measure M2:

> "The NYISO certified that each Large IBR Generating Facility Developer attested to compliance with its applicable requirements in R2 and identified any Large IBR Generating Facility Developer that failed to provide a required attestation(s)."

The NYISO appreciates NYSRC's consideration of its comments. Please feel free to reach out to us if you have any questions.