

Order No. 2023 – Improvements to Generator Interconnection Procedures and Agreements



*Summary of Adjustments and Tariff Redline
Updates in Response to Order No. 2023-A*

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Background

- On July 28, 2023, the Federal Energy Regulatory Commission (“FERC”) issued Order No. 2023 (184 FERC ¶ 61,054) adopting significant reforms to the standard Large Generator Interconnection Procedures (“LGIP”) and Small Generator Interconnection Procedures (“SGIP”)
 - The reforms build on the standardized procedures that FERC established in Order Nos. 2003, 2006, and 845 to address interconnection queue backlogs, improve certainty, and prevent undue discrimination for new technologies
- On March 21, 2024 FERC issued Order No. 2023-A (186 FERC ¶ 61,199) an “Order Addressing Arguments Raised on Rehearing, Setting Aside Prior Order, In Part, and Granting Clarification” of Order No. 2023
 - As a result of Order No. 2023-A, ISO-NE has revised its current compliance filing plan in order to address further incremental reforms within FERC’s required compliance deadline, *i.e.*, within thirty days of the publication of 2023-A in the Federal Register (Order No. 2023-A, P 9)

Presentation Overview

- ISO has [posted](#) an updated draft of all Tariff redlines associated with Order Nos. 2023/2023-A compliance
- This presentation summarizes the major updates to the Tariff redlines to address the incremental changes in Order No. 2023-A
- Focus on Large Generator Interconnection Procedures (LGIP) in Schedule 22 of the Open Access Transmission Tariff (OATT)
 - The Small Generator Interconnection Procedures (SGIP) in Schedule 23 of the OATT have been overhauled to mirror the LGIP
 - The Elective Transmission Upgrade Interconnection Procedures (ETUIP) in Schedule 25 of the OATT also closely matches the LGIP



Order Nos. 2023 and 2023-A Related Filings: Timing and Scope

- ISO-NE plans to submit two contemporaneous filings by May 14, **2024**:
 - Order Nos. 2023 and 2023-A Related Changes under Section 205
 - Order Nos. 2023 and 2023-A Compliance Filing under Section 206
- Both filings will propose **August 12, 2024** as the Effective Date
- Order Nos. 2023 and 2023-A Compliance Filing will assume the Section 205 related changes to be in-place, and include changes to:
 - Tariff, Section I.2.2 (Definitions)
 - OATT, Schedule 22 (LGIP)
 - OATT, Schedule 23 (SGIP specific changes required by Order Nos. 2023/2023-A)
 - OATT, Schedule 11 (Update allocation for shared upgrade costs)
 - OATT, Section II.48 (Conforming changes related to establishment of CNRC commencing with Forward Capacity Auction 19)
 - OATT, Attachment K (Conforming changes in Section 15)
 - Market Rule 1, Section III.13 – Forward Capacity Market (FCM)
 - Conforming changes associated with moving the qualification analysis to Schedules 22, 23 and 25; elimination of Conditional Qualification and Long Lead Time Facility treatment
- Compliance filing will request that any changes deemed beyond compliance be considered under the contemporaneous related changes filing under Section 205

Order Nos. 2023 and 2023-A Related Section 205 Filing Scope

- In creating a compliance plan, the ISO determined that changes to Schedules 23 and 25, as well as Sections II.19 and II.36 are needed in order to implement the Order Nos. 2023 and 2023-A Cluster Study Process
- This filing will include changes to:
 - OATT, Schedule 23
 - Revise SGIP consistent with LGIP to require that Small Generating Facilities go through the same clustering process as those under Schedule 22
 - OATT, Schedule 25
 - Require that Elective Transmission Upgrades (ETUs) go through the same clustering process as those under Schedule 22
 - OATT, II.19; II.34 – Regional Network Service/TOUT Rules
 - Incorporate applications requiring studies in the cluster study process
- Anticipate indicating that while this filing is an integrated proposal, its components are independent to allow for the Commission to direct changes

Transition Process Dates and Milestones*

- “Effective Date”
 - ISO is proposing an Effective Date of **August 12, 2024**
 - Execution of Transitional Serial Interconnection Facilities or Transitional Cluster Study Agreement is due no later than 60 Calendar Days (CD) from the Effective Date and studies would commence thereafter
- “Eligibility Date”
 - Consistent with Order 2023/2023-A, a May 14 compliance filing date results in an Eligibility Date of June 13, 2024. This means that only Interconnection Customers with a valid IR as of **June 13, 2024** will be eligible to elect to proceed with a transition study (or elect to withdraw from the interconnection queue without penalties)
 - On August 12, the ISO will issue a Transitional Serial Interconnection Facilities Study Agreement or a Transitional Cluster Study Agreement to Interconnection Customers with eligible IRs
- IRs that are not valid and have not been assigned a Queue Position as of the Eligibility Date will be withdrawn by the ISO without further opportunity to cure any deficiencies (withdrawal penalties will not apply)
 - The ISO will not accept IRs submitted after the Eligibility Date until the first Cluster Entry Window Opens in 2025
 - Ongoing study work for IRs for which an SIS is underway as of the Eligibility Date will continue through August 30, 2024**

*All dates assume FERC acceptance of ISO-NE’s compliance proposal

**Discussed further later in the presentation

TRANSITION PROCESS

Updates to the Transition Process Timeline to account for the additional time introduced by Order No. 2023-A



Late Stage System Impact Studies

- The ISO's proposed Order No. 2023 compliance allowed for the continued conduct of certain System Impact Studies (SIS) after the Eligibility Date
 - SISs could continue to attempt to complete by June 30, 2024
- Proposed Order No. 2023-A package will extend this late-stage SIS completion deadline to August 30, 2024*

*Note that this extension does not apply to the SIS completion date needed for the Transitional CNR Group Study, which is discussed next

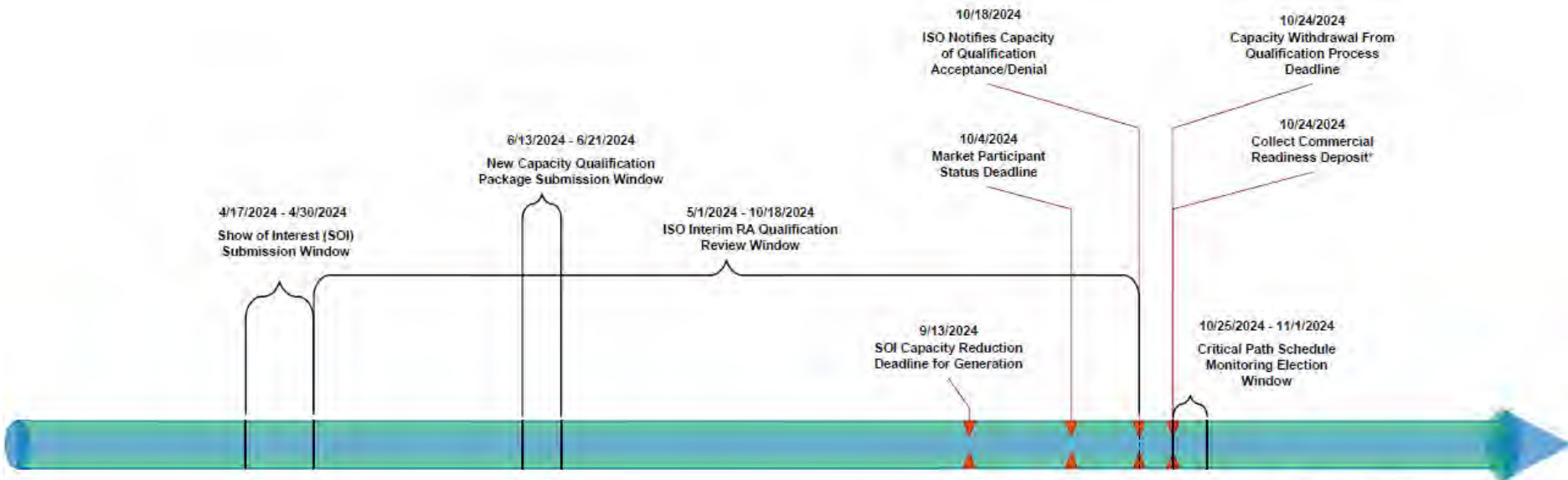


Transitional CNR Group Study

- The ISO's proposed Order No. 2023 compliance included a Transitional CNR Group Study
- Leverages the interim reconfiguration (RA) qualification process performed in 2024 pursuant to Section III.13.A.2 to support an "Order No. 2023 capacity interconnection transition process"
 - For projects with an Interconnection Request (IR) for Capacity Network Resource Interconnection Service (CNRIS)/Capacity Network Import Interconnection Service (CNIIS) to establish Capacity Network Resource Capability (CNRC)/Capacity Network Import Capability (CNIC)
- Proposed Order No. 2023-A package will retain the Transitional CNR Group Study **on the originally-proposed schedule**
 - The study is tied to the 2024 interim RA qualification process schedule, which is established by the Forward Capacity Market

Timeline for the Transitional CNR Group Study

2024 Interim Reconfiguration Auction Qualification Process



* The Commercial Readiness Deposit applies in the case of FERC acceptance of [ISO-NE's proposed compliance with Order No. 2023](#). The deadline would only apply to Generating Capacity Resources and Import Capacity Resources associated with a project subject to the ISO Interconnection Procedures

Transitional CNR Group Study - Requirements

- Show of Interest must be submitted by April 30, 2024 and New Capacity Qualification Package must be submitted by June 21, 2024
- SIS must be completed by June 30, 2024
 - To allow enough time to complete the study while accounting for any identified NR related upgrades, given the timeline
- No upgrades associated with meeting the Capacity Capability Interconnection Standard are permitted
 - The timeline allows the ISO to provide preliminary study results, which may provide Interconnection Customers the opportunity to reduce a project's requested capacity service to a level that does not require upgrades
- Commercial Readiness Deposit, unchanged from ISO's previous proposal
- Please see the [Interim Reconfiguration Auction Qualification](#) Page for further participation guidance

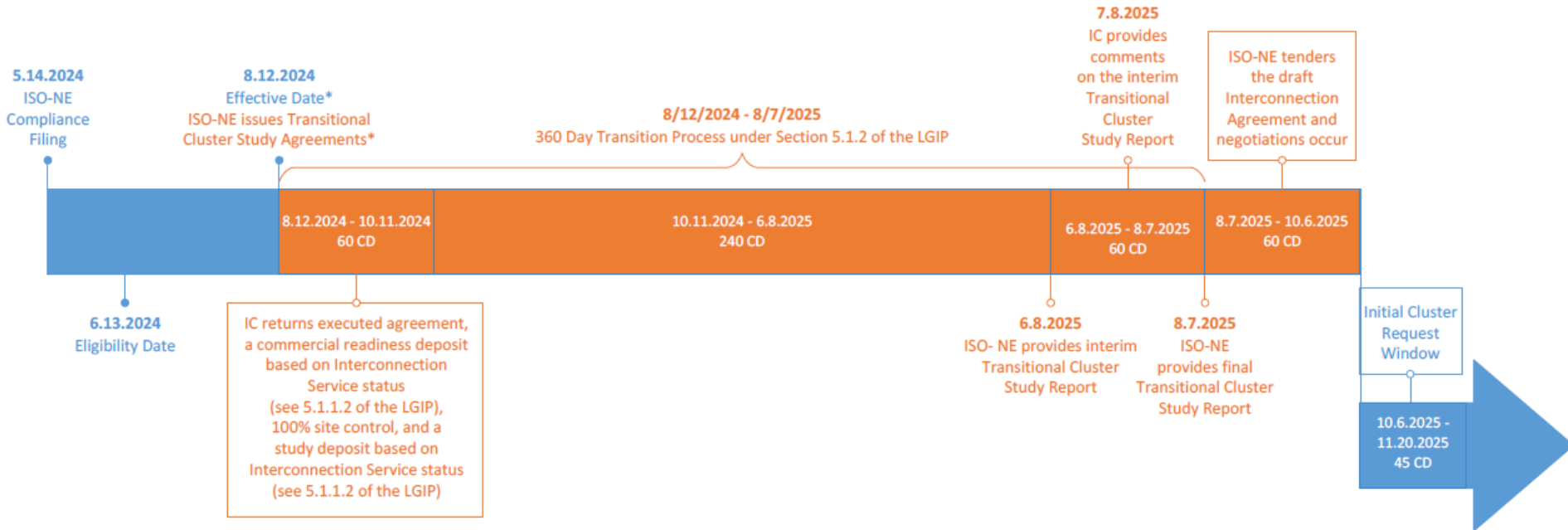
Order No. 2023 Transition – Updated Timeline

- Aside from the Transitional CNR Group Study, the timeline for the remaining Order No. 2023 transition items has been updated to account for the delay caused by Order No. 2023-A
- Signed Transitional Cluster Study Agreements and associated requirements will be due by October 11, 2024
 - The Transitional Cluster Study will proceed thereafter

Transition Order 2023 Timeline Transitional Cluster Study

Key

LGIP = Large Generator Interconnection Procedures
IC = Interconnection Customer
CD = Calendar Days



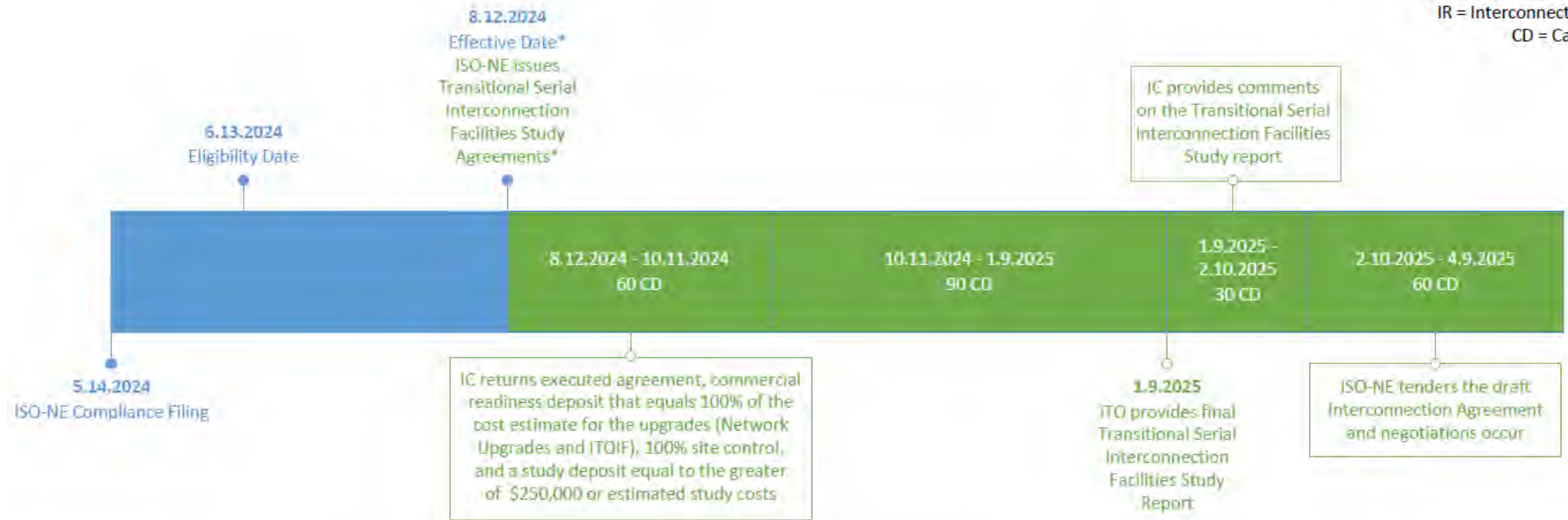
*Late stage System Impact Studies have until 8/30/2024 to have comments addressed and to be finalized. Interconnection Customers for which the System Operator projects to complete the system impact studies between 6/13/2024 and 8/30/2024, shall be tendered a Transitional Cluster Study Agreement no later than the Commission-approved effective date of this LGIP. However, if the Interconnection Customer accepts the results of its system impact study on or before 8/30/2024, the System Operator shall not include the Interconnection Request in the Transitional Cluster Study, and instead will tender a Large Generator Interconnection Agreement pursuant to Section 11 of this LGIP, and refund any deposits associated with participation in the Transitional Cluster Study.

*This will be the requested Effective Date in ISO-NE's compliance filing, but it will actually be determined by the FERC approval.

Transition Order 2023 Timeline Transitional Serial Interconnection Facilities Study

Key

- ITOIF = Interconnecting Transmission Owner's Interconnection Facilities
- LGIP = Large Generator Interconnection Procedures
- ITO = Interconnecting Transmission Owner
- IA = Interconnection Agreement
- IC = Interconnection Customer
- IR = Interconnection Request
- CD = Calendar Days



*IRs with completed System Impact Studies as of 6/13/2024 that elect to proceed with the Transitional Serial Interconnection Facilities Study will follow this timeline. Otherwise, they elect to proceed directly to IA negotiations.

*This will be the requested Effective Date in ISO-NE's compliance filing, but it will actually be determined by the FERC approval.

UPDATES TO THE TARIFF REDLINES TO COMPLY WITH ORDER NO. 2023-A

Yellow highlighting indicates changes since ISO's Order 2023 compliance proposal, approved at the March 7, 2024 NEPOOL Participants Committee meeting

Green highlighting indicates changes since to original posting of this presentation on April 12, 2024

Scope of Order No. 2023-A changes

- Order No. 2023-A requires multiple updates across various sections of the interconnection procedures
 - Highlights in the following slides
- Most notable substantive changes are
 - Allowance for surety bonds for Commercial Readiness Deposits
 - Allowance for Option to Build in the case of shared network upgrades
- There are multiple clarifications and clean-up items



Surety Bonds

- Order No. 2023 did not require surety bonds for Commercial Readiness Deposits
- ISO will comply with the surety bond requirement in Order No. 2023-A
 - Beginning with the first regular Order No. 2023 Cluster Study process in 2025
- ISO will not be able to accept surety bonds for transition-related activities
 - ISO has never previously processed surety bonds
 - Time will be needed to establish appropriate processes and controls
 - The proposed surety bond language on the following slides is not included in the transition portion of the procedures

Surety Bonds – Tariff Language

Tariff Section	Tariff Change	Reason for Change
<p>Schedule 22 Section 3.1</p>	<p><u>Unless otherwise stated, all Commercial Readiness Deposits that must be submitted to the System Operator under this LGIP must be (a) delivered to the System Operator’s bank account by electronic transfer, (b) through the provision and maintenance of an irrevocable letter of credit in a form and from a financial institution acceptable to System Operator and included on the List of Eligible Commercial Readiness Deposit Letter of Credit Issuers, as described on the System Operator’s public website, (c) a surety bond in a form and from a financial institution acceptable to System Operator and included on the List of Eligible Surety Bond Issuers, as described on the System Operator’s public website or (d) a combination thereof. Each letter of credit or surety bond must specify the Interconnection Request to which it corresponds. All costs associated with obtaining a letter of credit or surety bond shall be borne by the Interconnection Customer. In the event that System Operator identifies an administrative deficiency with a submitted letter of credit or surety bond, Interconnection Customer shall have ten (10) [TBC by System Operator] five (5) Business Days to cure the deficiency.</u></p>	<p>Order 2023-A inclusion of surety bonds for the commercial readiness deposit</p> <p><i>(At the time of this posting, ISO is still working on the appropriate length of cure period for surety bonds)</i></p>

Surety Bonds – Tariff Language, continued

Tariff Section	Tariff Change	Reason for Change
<p>Schedule 22 Section 3.1</p>	<p><u>If the System Operator removes the financial institution from the list, Interconnection Customer shall have ten (10) five (5) Business Days from the date on which System Operator provides notice of such removal to replace the letter of credit or surety bond with a letter of credit or surety bond from a financial institution on the list. The System Operator may extend this cure period in its sole discretion. Failure to cure a deficiency within the periods prescribed in this Section 3.1 shall result in the withdrawal of the Interconnection Request pursuant to Section 3.7 of the LGIP without further opportunity to cure. System Operator shall only provide refunds and/or distribute funds held as part of a Commercial Readiness Deposit to the extent that there are sufficient funds available from the applicable form of financial security.</u></p>	<p>Order 2023-A inclusion of surety bonds for the commercial readiness deposit</p>

Substation Network Upgrades – Cost Allocation

Tariff Section	Tariff Change	Reason for Change
OATT Schedule 11 5.ii.(1).(a)	<p><u>Substation Network Upgrades, including switching stations, shall be allocated first per capita for each Interconnection Facility interconnecting to the substation at the same voltage level, and then per capita to each Generating Facility or ETU sharing the Interconnection Facility that has a Point of Interconnection located at the same substation.</u></p>	Order No. 2023-A clarification regarding the allocation of station network upgrade costs



Definitions

Tariff Section	Tariff Change	Reason for Change
<p>Schedule 22 Definitions</p>	<p>Interconnection Study shall mean any of the following studies: the Interconnection Feasibility Study, the the <u>Cluster</u> Interconnection System Impact Study, <u>the Cluster Interconnection Facilities Study, the Cluster Study, the Cluster Restudy, the Surplus Interconnection Service System Impact Study,</u> the Interconnection Facilities Study, <u>the Affected System Study, the Optional Interconnection Study, and the Material Modification assessment,</u> and the Optional Interconnection Study described in this <u>LGIPe Standard Large Generator Interconnection Procedures</u>. Interconnection Study shall not include a CNR Group Study.</p>	<p>Updates to clarify items to be considered as “Interconnection Studies”</p>



Definitions, continued

Tariff Section	Tariff Change	Reason for Change
<p>Schedule 22 Definitions</p>	<p>Stand Alone Network Upgrades shall mean Network Upgrades that are not part of an <u>Internal</u> Affected System that an Interconnection Customer may construct without affecting day-to-day operations of the New England Transmission System during their construction and the following conditions are met: (1) a Substation Network Upgrade must only be required for a single Interconnection Customer in the Cluster and no other Interconnection Customer in that Cluster is required to interconnect to the same Substation Network Upgrades, and (2) a System Network Upgrade must only be required for a single Interconnection Customer in the Cluster, as indicated under the System Operator's Proportional Impact Method.</p>	<p>Order 2023-A update to allow for Stand Alone Network Upgrade approach where there is shared cost responsibility</p>



Definitions, continued

Tariff Section	Tariff Change	Reason for Change
Schedule 22 Definitions	<p>Transitional Cluster Study Agreement shall mean the agreement contained in Appendix 7 to this LGIP that is made between System Operator and Interconnection Customer to conduct a Transitional Cluster Study pursuant to Section 5.1.1.2 of this LGIP.</p> <p>Transitional Serial Interconnection Facilities Study Agreement shall mean the agreement contained in Appendix 8 to this LGIP that is made between System Operator and Interconnection Customer to conduct a Transitional Serial Interconnection Facilities Study pursuant to Section 5.1.1.1 of this LGIP.</p>	Order 2023-A additional definitions

Definitions, continued

Tariff Section	Tariff Change	Reason for Change
Schedule 22 Definitions	<p><u>Transitional Withdrawal Penalty shall mean the penalty assessed by System Operator to Interconnection Customer that has entered the Transitional Cluster Study or Transitional Serial Interconnection Facilities Study and chooses to withdraw or is deemed withdrawn from System Operator's interconnection queue or whose Generating Facility does not otherwise reach Commercial Operation. The calculation of the Transitional Withdrawal Penalty is set forth in Sections 5.1.1.1 and 5.1.1.2 of this LGIP.</u></p>	Order 2023-A additional definition



Deficiencies in the IR

Tariff Section	Tariff Change	Reason for Change
Schedule 22 Section 3.4.4	<p>Failure by Interconnection Customer to comply with this Section 3.4.3 shall be treated in accordance with Section 3.7. In the event that Interconnection Customer fails to comply with this Section 3.4.4 of this LGIP, System Operator shall deem the Interconnection Request withdrawn (without the cure period provided under Section 3.7 of this LGIP), the application fee is forfeited to System Operator, and the study deposit and Commercial Readiness Deposit shall be returned to Interconnection Customer.</p>	Order No. 2023-A clarification



Cluster Study Scoping Meeting

Tariff Section	Tariff Change	Reason for Change
Schedule 22 Section 3.4.6	<p>The Parties will bring to the meeting such technical data, including, but not limited to: (i) general facility loadings, (ii) general instability issues, (iii) information regarding general short circuit issues, (iv) general voltage issues, and (v) general reliability issues as may be reasonably required to accomplish the purpose of the meeting. The Parties will also bring to the meeting personnel and other resources as may be reasonably required to accomplish the purpose of the meeting in the time allocated for the meeting. On the basis of the meeting, Interconnection Customer(s) shall designate its Point of Interconnection, pursuant to Section 6.1, and one or more available alternative Point(s) of Interconnection. The duration of the meeting shall be sufficient to accomplish its purpose.</p>	Order No. 2023-A clarification regarding the articulation of Point of Interconnection

Distribution of Withdrawal Penalty

Tariff Section	Tariff Change	Reason for Change
Schedule 22 Section 3.7.1.2.1	<p><u>The total amount of funds used to fund these studies under the Cluster Study Process or those applied to any net increases in Network Upgrade costs for Interconnection Customers in the same Cluster shall not exceed the total amount of Withdrawal Penalty funds collected from the Cluster.</u></p>	Order No. 2023-A clarification on limitation of Withdrawal Penalty disbursement



Transition CNR Group Study

Tariff Section	Tariff Change	Reason for Change
Schedule 22 Section 5.1.1.3	<u>An Interconnection Customer with an assigned Queue Position as of thirty (30) Calendar Days after April 1 May 14, 2024 may participate in the Transitional CNR Group Study, and consistent with Section II.48 of the Tariff, achieve CNR Interconnection Service.</u>	Adjusted date as a result of Order No. 2023-A



Transition CNR Group Study, continued

Tariff Section	Tariff Change	Reason for Change
<p>Schedule 22 Section 5.1.1.3</p>	<p><u>Any Interconnection Customer seeking to participate in the Transitional CNR Group Study that receives a qualification determination notification under Section III.13.1.1.2.8 of the Tariff, must provide, a Commercial Readiness Deposit of one million dollars (\$1,000,000) in the form of an irrevocable letter of credit, cash, or a combination thereof prior to the opening of the window to elect critical path schedule monitoring. Such deposit shall be refunded to the Interconnection Customer Interconnection Customer: (a) upon the Generating Facility achieving Commercial Operation on or before June 1, 2028, or (b) within sixty (60) Business Days of the date that the Interconnection Customer Interconnection Customer secures a Capacity Supply Obligation in a reconfiguration auction or Forward Capacity Auction, where such auction was held prior to June 1, 2028. If the Interconnection Customer Interconnection Customer (a) withdraws the Interconnection Request from the queue or (b) neither does not achieve Commercial Operation nor secures a Capacity Supply Obligation through a reconfiguration auction or Forward Capacity Auction prior to June 1, 2028, System Operator shall refund the deposit to Interconnection Customer in accordance with Section 3.7 of this LGIP and the Interconnection Customer Interconnection Customer's Interconnection Request shall be reduced to NR Interconnection Service.</u></p>	<p>Adjusted date as a result of Order No. 2023-A</p>

Alternative Transmission Technologies

Tariff Section	Tariff Change	Reason for Change
Schedule 22 Section 7.3	<p><u>The Cluster Study shall evaluate the use of static synchronous compensators, static VAR compensators, advanced power flow control devices, transmission switching, synchronous condensers, voltage source converters, advanced conductors, and tower lifting. System Operator shall evaluate each identified alternative transmission technology and determine, in the manner described in the ISO New England Planning Procedures, whether the above technologies should be used, consistent with Good Utility Practice, Applicable Reliability Standards, and Applicable Laws and Regulations and other applicable regulatory requirements. System Operator shall include an explanation of the results of the System Operator's evaluation for each technology in the Cluster Study Report.</u></p>	Order No. 2023-A clarification on alternative transmission technologies

Cluster Study Restudies

Tariff Section	Tariff Change	Reason for Change
Schedule 22 Section 7.5	<p><u>If a Cluster Restudy is required due to a higher queued project withdrawing from the queue, or a modification of a higher or equally queued project subject to Section 4.4 of this LGIP, System Operator shall so notify affected Interconnection Customers in writing. Except as provided in Section 3.7 of this LGIP in the case of withdrawing Interconnection Customers, any cost of Restudy shall be borne by Interconnection Customers being restudied.</u></p>	Order No. 2023-A clarification on notification and cost responsibility for restudies



Facility Study Agreement Tender

Tariff Section	Tariff Change	Reason for Change
<p>Schedule 22 Section 8.1</p>	<p>Within five (5) Business Days following System Operator notifying each Interconnection Customer within the Cluster that no further Cluster Restudy is required (per Section 7.5 of this LGIP), the System Operator shall provide to the Interconnection Customer an Interconnection Facilities Study Agreement in the form of Appendix 4 to this LGIP thirty (30) Calendar Days after the Cluster Study Report Meeting, unless System Operator determines that Cluster Restudy is required, in which case, System Operator shall provide to the Interconnection Customer an Interconnection Facilities Study Agreement within thirty (30) Calendar Days of the Cluster Restudy Report Meeting, simultaneously with the delivery of the Interconnection System Impact Study to the Interconnection Customer.</p>	<p>Order No. 2023-A timing correction – removes the need for ISO’s proposed work-around</p>

Option to Build

Tariff Section	Tariff Change	Reason for Change
LGIA Section 5.1.3	<p>Individual or Multiple Interconnection Customer(s) shall have the option to assume responsibility for the design, procurement and construction of new Interconnecting Transmission Owner's Interconnection Facilities and Stand Alone Network Upgrades on the dates specified in Article 5.1.2 if the requirements of this Article 5.1.3 are met. When multiple Interconnection Customers exercise this option, multiple Interconnection Customers may agree to exercise this option provided (1) all Transmission Provider's Interconnection Facilities and Stand Alone Network upgrades constructed under this option are only required for Interconnection Customers in a single Cluster and (2) all impacted Interconnection Customers execute and provide to Transmission Provider an agreement regarding responsibilities and payment for the construction of Interconnecting Transmission Owner's Interconnection Facilities and Stand Alone Network Upgrades planned to be built under this option. The System Operator, Interconnecting Transmission Owner, and the individual Interconnection Customer or each of the multiple Interconnection Customers must agree as to what constitutes Stand Alone Network Upgrades and identify such Stand Alone Network Upgrades in Appendix A to the LGIA.</p>	Order No. 2023-A allowance for the option to build approach where there is shared cost responsibility



Other Updates Required by Order No. 2023-A

- Various additions/clarifications regarding notifications associated with Affected Systems coordination
- Several clean up items
- Updated dates for transition, as summarized in this presentation



Conclusion and Next Steps

- ISO has updated the proposed compliance to account for Order No. 2023-A
- Relevant ISO-NE Planning Procedure updates were introduced at the March 19th Reliability Committee (RC) Meeting and will return to the RC in May 2024
- Updates to ISO-NE Planning Procedures to include:
 - Capture the implementation of the clustering approach
 - Clarification on Affected System Operator studies of distribution-connected generation
 - Further refinements and updates to inverter-based resource modeling requirements and processes



Stakeholder Schedule

Stakeholder Committee and Date	Scheduled Project Milestone
Transmission Committee April 25, 2024	Review of Incremental Updates to Comply with Order No. 2023-A Stakeholder Amendments (if needed) & Vote(s)
Participants Committee May 2, 2024	Vote
May 14, 2024	File Compliance and 205 Filings

Questions



APPENDIX

Affected System Operator (ASO) Study Coordination



ASO Study Coordination

- FERC Order No. 2023 Coordination
 - ASO studies and FERC studies will be further coordinated with the changes from FERC Order No. 2023
 - There will be a delineation between those projects that are relevant to a FERC cluster and those that are not
 - Studies taking place in a part of the system that *are* not relevant will be able to complete their studies without respecting the ongoing FERC cluster
 - Studies taking place in a part of the system that are relevant will need to respect and coordinate with the ongoing FERC cluster
 - These studies will need to model all relevant FERC jurisdictional projects that are present within the cluster study
 - Depending on the in-service date of the projects, the ASO study may need to run both pre- and post-FERC project cases
 - ASO study will use the FERC cluster study cases, and incorporate all models of the proposed FERC jurisdictional projects within that relevant FERC Cluster study

ASO Study Coordination, continued

- FERC Order No. 2023 Coordination
 - Timing
 - ASO studies comprised of State Jurisdictional Projects that are expected to achieve I.3.9 approval within 90 days of the start of the FERC Transitional Cluster Study (*Date to-be-determined*), will be respected within the FERC Transitional Cluster Study.
 - These ASO studies will **not** be required to wait to complete until after the Transitional Cluster Study
 - They would not have to respect the Transition Cluster Study – they would be included in the base case for the Transition Cluster Study
 - ASO studies comprised of State Jurisdictional Projects that are **not** expected to achieve I.3.9 approval within 90 days after the transitional cluster study starts will need to respect the relevant FERC Cluster study
 - These ASO studies will then be studied in parallel with the Transitional Cluster Study
 - Planning Procedure updates will describe how this parallel coordinated study should take place

Coordination with ASO Studies

Transition Cluster Study

- At the beginning of the (Transition) Cluster Study phase – the study case for ISO-queued projects is established
 - All ISO-queued modeling information has been provided by Interconnection Customers
 - No new ISO Interconnection Requests can be added to the study case until the beginning of the next Cluster Study
- ISO will make the study case and modeling information available to Transmission Owners (TOs) to conduct ASO studies
- TOs can conduct the ASO studies in parallel with the Transition Cluster Study
 - As long as the ASO studies are within 90 days of achieving I.3.9 approval (and all modeling information is provided) by the beginning of the next ISO Cluster Study, the ASO studies can be completed
 - They would not have to respect the next Cluster Study – they would be included in the base case for the next Cluster Study
 - ASO studies can be deemed complete when they have sufficiently represented relevant projects in the ISO Cluster Study that is nearing completion
 - ASO studies do not have to wait for ISO projects to be sufficiently completed when those projects are not relevant to the ASO studies