



## Questions and Answers on the 2024 Interim Reconfiguration Auction (RA) Qualification Process

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### General Notes Applicable to this Q&A Document

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The answers to frequently asked questions included in this document reflect the ISO's expected implementation of the 2024 interim RA qualification process, as well as the ISO's expected compliance with FERC Order No. 2023 and Order No. 2023-A, at the time of its publication. These ISO expected implementation and compliance may change before final implementation. Market Participants should continually check for updates, follow the applicable stakeholder committee discussions, and review the final version of the rules. If there is any discrepancy between the contents of this document and the Tariff, the Tariff controls.

Reference in this document to RAs includes annual and monthly RAs (as applicable) and the bilateral activities described in Sections III.13.4 and III.13.5 of the Tariff.

References in this document to Capacity Network Resource Interconnection Service (CNRIS) and Capacity Network Resource Capability (CNRC) apply equally to Capacity Network Import Interconnection Service (CNIIS) and Capacity Network Import Capability (CNIC), respectively.

### General 2024 Interim RA Qualification Process Questions

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#### **Q1: What is the purpose of the 2024 interim RA qualification process?**

**Answer:** The 2024 interim RA qualification process allows New Capacity projects that (a) have early proposed Commercial Operation dates, and (b) have not acquired a Capacity Supply Obligation (CSO), to access RA activities, despite not having completed a Forward Capacity Auction (FCA) qualification process and electing critical path schedule (CPS) monitoring through that FCA qualification process. Without the 2024 interim RA qualification process, such projects would need to wait for the FCA 19 qualification process (which has been delayed) and associated CPS monitoring election window to complete the steps that would allow access to RA activities.

#### **Q2: Will completing the 2024 interim RA qualification process result in my project qualifying for FCA 19?**

**Answer:** No, the 2024 interim RA qualification process is for RA access only. Projects that successfully complete the 2024 interim RA qualification process will need to participate in the FCA 19 qualification process if they wish to qualify for FCA 19 (which has been delayed). The

materials a Project Sponsor submits for a project for the 2024 interim RA qualification process should be the same as the materials it eventually submits for the FCA 19 qualification process.

**Q3: Will the submissions required for the 2024 interim RA qualification process be very different from the submissions required for recent FCA qualification processes?**

**Answer:** No, the submissions required for the 2024 interim RA qualification process will be similar to those used for recent FCA qualification processes. For example:

- Project Sponsors will need to submit a Show of Interest (SOI) Form in April and a New Capacity Qualification Package (NCQP) in June.
- Much of the [information required for the 2024 interim RA qualification process](#) SOI Form and NCQP is similar to the information required for the same submissions for recent FCA qualification processes.

The ISO will adapt the Forward Capacity Tracking System (FCTS) as much as possible to support the 2024 interim RA qualification process, with the goal of making submission experiences for the interim RA qualification process and qualification for recent FCAs as similar as possible.

**Q4: Where can I find the schedule for the 2024 interim RA qualification process activities?**

**Answer:** Click [here](#) for the 2024 interim RA qualification process schedule, which is posted on the ISO website.

**Q5: Do I have to use FCTS to submit an SOI Form for the 2024 interim RA qualification process?**

**Answer:** Yes. A digital certificate is required to access FCTS. Click [here](#) for information on how to obtain access to FCTS.

**Q6: Can I carry over an SOI Form submitted for FCA 18 into the interim RA qualification?**

**Answer:** No, the carry over functionality in FCTS will not be available to support submissions for the 2024 interim RA qualification process. This carry over functionality is integrated with various Existing Capacity Resource and critical path schedule monitoring functions in FCTS, resulting in the inability to make it available exclusively for New Capacity Resources that have not acquired a CSO.

**Q7: Is a Qualification Process Cost Recovery Deposit (QPCRD) required for projects participating in the 2024 interim RA qualification process?**

**Answer:** Yes, a QPCRD is required for projects participating in the 2024 interim RA qualification process. The amount of the deposit for each resource type is specified in Section III.13.1.9.3 of the Tariff. The QPCRD is billed as a line item on the Non-Hourly invoice that the ISO issues typically in May after the close of the SOI submission window. The ISO will withdraw projects from the 2024 interim RA qualification process if it does not receive the required payment by the invoice due date.

**Q8: What happens if a Project Sponsor is unable to become a Market Participant by the 'Market**

**Participant status' deadline?**

**Answer:** The ISO will withdraw all projects submitted by a Project Sponsor from the 2024 interim RA qualification process if the Project Sponsor does not become a Market Participant by the 'Market Participant status' deadline, unless the project is transferred to a Market Participant by the 'capacity withdrawal from qualification process' deadline.

**Q9: How will the ISO perform the capacity deliverability analysis for the 2024 interim RA qualification process?**

**Answer:** For the 2024 interim RA qualification process, the ISO will perform the capacity deliverability analysis consistent with current rules in Section III.13 of the Tariff and Planning Procedure 10 (i.e. the rules that describe overlapping interconnection impacts analysis).

**Q10: How will the ISO notify me if my project has successfully completed the 2024 interim RA qualification process?**

**Answer:** The ISO will issue qualification determination notifications through FCTS by the 'ISO notifies capacity of qualification acceptance/denial' deadline.

**Q11: Is non-commercial financial assurance required for projects that successfully complete the interim RA qualification process?**

**Answer:** No, financial assurance associated with Non-Commercial Capacity (including the \$2/kW times the Non-Commercial Capacity qualified for an FCA deposit described in Section VII.B.1 of the ISO-NE Financial Assurance Policy) is not required for projects that successfully complete the 2024 interim reconfiguration auction qualification process, since this qualification process is not associated with an FCA. RA participation requirements, including any requirements related to other forms of financial assurance, remain unchanged and apply to all resources seeking to participate in an RA (including those that successfully complete the 2024 interim RA qualification process).

**Q12: Can I withdraw my project from the 2024 interim RA qualification process?**

**Answer:** A Project Sponsor may withdraw a project before the 'capacity withdrawal from qualification process' deadline by submitting a written withdrawal request to Participant Support via [Ask ISO](#) or through email to [AskISO@iso-ne.com](mailto:AskISO@iso-ne.com).

**Q13: Can I submit a 2024 interim RA qualification process SOI Form for the uncleared portion of a resource that already has some CSO?**

**Answer:** No, the 2024 interim RA qualification process is only for New Capacity Resources that have never obtained any CSO. As explained in the [ISO's November 3, 2023, filing letter for the one-year FCA 19 delay](#) (which introduced the 2024 interim RA qualification process): "*Capacity resources that have already acquired a [CSO], or portions thereof, are not eligible to utilize this new provision. These ineligible resources include capacity resources that would qualify for the FCA under Tariff Section*

*III.13.1.1.1.2 (re-powering), Section III.13.1.1.1.3 (incremental capacity), Section III.13.1.1.1.4 (de-rated capacity), and Sections III.13.1.1.1.1(c) and III.13.1.1.2.5.4 (partially cleared resources). These resources can already participate in reconfiguration auctions or bilateral activities through their existing capacity, and any qualification of new capacity from these resources is dependent on the qualification and FCA participation of that existing capacity.”*

**Q14: Can Distributed Energy Capacity Resources (DECRs) participate in the 2024 interim RA qualification process?**

**Answer:** No, DECRs cannot participate in the 2024 interim RA qualification process because the qualification rules for DECRs will not be effective until FCA 19 (which has been delayed).

**Questions on the Impacts of ISO’s FERC Order No. 2023 Compliance Proposal on the Interim RA Qualification Process**

***Note: Answers in this Section are based on the compliance package that the ISO proposed and stakeholders supported before the issuance of FERC Order No. 2003-A on March 21, 2024. That compliance package may be revised if and as needed to comply with additional FERC directives in FERC Order No. 2023-A.***

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**Q15: Which Tariff rules will be in effect for the 2024 interim RA qualification process, and how does the ISO’s Order No. 2023 compliance proposal plans impact the 2024 interim RA qualification process eligibility criteria?**

**Answer:** Section III.13.A.2 of the Tariff contains the rules that will be in effect for the interim RA qualification process. The currently effective version of Tariff Section III.13.A.2 states that only New Capacity Resources that have not acquired a CSO and intend to achieve Commercial Operation (as defined in Section III.13.1.1.2.2.2(h)) before June 1, 2026 may use the 2024 interim RA qualification process.

The ISO developed a FERC Order No. 2023 compliance proposal through a stakeholder process, and was working towards filing the compliance proposal with FERC on April 1, 2024. This compliance proposal includes a Transitional Capacity Network Resource (CNR) Group Study, which would impact the 2024 interim RA qualification process eligibility rules as follows:

- The June 1, 2026 Commercial Operation deadline would be extended to June 1, 2028 (which supports participation in RAs for Capacity Commitment Periods (CCPs) up to and including the 2027-2028 CCP).
- Projects subject to the ISO Interconnection Procedures would be required to have a completed System Impact Study (SIS) before July 1, 2024 in order to participate in the 2024 interim RA qualification.

FERC issued Order No. 2023-A on March 21, 2024, and the ISO is assessing how its original Order No. 2023 compliance proposal would be modified as a result. The new order also delays the timing for

submitting Order No. 2023 compliance filings to FERC. As a result, the ISO was no longer able to file its Order No. 2023 compliance proposal by April 1, 2024.

The ISO does not expect to have a FERC approved Order No. 2023 compliance proposal, which would include the supporting Transitional CNR Group Study, before the deadline for submitting an SOI Form for the 2024 interim RA qualification process. The ISO will apply the rules in effect at the time it makes qualification determinations for the 2024 interim RA qualification process.

**Q16: What other significant impacts does the ISO's FERC Order No. 2023 compliance proposal have on the 2024 interim RA qualification process?**

**Answer:** The ISO's FERC Order No. 2023 compliance proposal and supporting Transitional CNR Group Study would result in an interconnection process where projects establish CNRC by completing the interconnection process. In other words, after September 1, 2024, projects would no longer be able to establish CNRC by clearing a CSO in a Forward Capacity Market (FCM) auction (i.e. an FCA or an RA).

The ISO's FERC Order No. 2023 compliance proposal includes a Transitional CNR Group Study, which would enable projects subject to the ISO Interconnection Procedures that have an Interconnection Request for CNRIS and a completed SIS to establish CNRC by successfully completing the 2024 interim RA qualification process.

**Q17: Can you provide more detail on how the ISO's FERC Order No. 2023 compliance proposal and supporting Transitional CNR Group Study would change the rules for projects to establish CNRC?**

**Answer:** Pursuant to current rules, projects can establish CNRC by clearing a CSO in an FCM auction. Under the ISO's FERC Order No. 2023 compliance proposal and supporting Transitional CNR Group Study, projects that qualified for a previous FCA and elected CPS monitoring would have continued access to reconfiguration auctions for CCPs covering the 2027-2028 CCP and earlier (assuming all other the RA qualification rules are met) until September 1, 2024, independent of how they cleared in FCA 18. Before this deadline, such projects may establish CNRC according to current rules (i.e., by obtaining a CSO in an FCA or RA). After this deadline, the participation of such projects in these RAs would be limited by the amount of CNRC they established before the deadline. After September 1, 2024, projects would be able to establish CNRC through one of two paths:

1. Completing the 2024 interim reconfiguration auction qualification process. Projects that establish CNRC through this path will still need to qualify for and participate in an FCM auction to obtain a CSO.
2. Completing a Cluster Study-based interconnection process (which includes the Transitional Cluster Study). Projects that establish CNRC through this path would still need to participate in an FCA qualification process or an interim RA qualification process in order to qualify for FCM auctions and obtain a CSO.

**Q18: Can I submit a Show of Interest Form for the 2024 interim RA qualification process if I intend**

**my project to achieve Commercial Operation on or after June 1, 2026?**

**Answer:** Yes, FCTS will allow Projects Sponsors to submit an SOI Form for projects that intend to achieve Commercial Operation on or after June 1, 2026. The ISO will apply the Commercial Operation deadline in effect at the time it makes qualification determinations for the 2024 interim RA qualification process (see the response to Question 15 for additional detail).

**Q19: Based on the ISO's FERC Order No. 2023 compliance proposal, would my project be able to participate in both the 2024 interim RA qualification process that supports the Transitional CNR Group Study and the Transitional Cluster Study?**

**Answer:** Yes, based on the ISO's FERC Order No. 2023 compliance proposal, a project would be able to submit an SOI Form and NCQP to participate in the 2024 interim RA qualification process that supports the Transitional CNR Group Study and an IR to participate in the Transitional Cluster Study, assuming the project meets all submission requirements and deadlines for both processes. Projects would only be able to successfully complete one of these processes. For example, a project may successfully complete the 2024 interim RA qualification process and then it would be able to withdraw from the Transitional Cluster Study without penalty. As another example, a project would be able to withdraw (or be withdrawn from) the 2024 interim RA qualification process and continue participation in the Transitional Cluster Study.

**Q20: Based on the ISO's FERC Order No. 2023 compliance proposal, do projects subject to the ISO-NE Interconnection Procedures need to have a completed SIS by the SOI submission deadline in order to participate in the 2024 interim RA qualification process that would support the Transitional CNR Group Study?**

**Answer:** No, based on the ISO's FERC Order No. 2023 compliance proposal, projects subject to the ISO Interconnection Procedures would not need to have a completed SIS by the SOI submission deadline for the 2024 interim RA qualification process that supports the Transitional CNR Group Study. However, such projects will need to have a completed SIS before July 1, 2024<sup>1</sup> in order to successfully complete the 2024 interim RA qualification process and allow inclusion of any upgrades identified in the SIS in the Transitional Cluster Study base case. Note the ISO will review the completed interconnection studies for all projects participating in the interim RA qualification process to ensure any identified upgrades can be constructed before June 1, 2028.

**Q21: Based on the ISO's FERC Order No. 2023 compliance proposal, do projects not subject to the ISO-NE Interconnection Procedures need to have a completed SIS by the SOI submission deadline in order to participate in the 2024 interim RA qualification process that supports the Transitional CNR Group Study?**

**Answer:** No, based on the ISO's FERC Order No. 2023 compliance proposal, projects not subject to the ISO Interconnection Procedures do not need to have a completed SIS by the SOI submission

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<sup>1</sup> This date is expected to be updated as part of ISO's Order No. 2023-A compliance filing.

deadline for the 2024 interim RA qualification process that supports the Transitional CNR Group Study. Note that the ISO will review the completed interconnection studies for all projects participating in the interim RA qualification process to ensure any identified upgrades can be constructed before June 1, 2028. Projects not subject to the ISO Interconnection Procedures do not require a completed SIS to successfully complete the 2024 interim RA qualification process.

**Q22: Based on the ISO's FERC Order No. 2023 compliance proposal, can a project successfully complete the 2024 interim RA qualification process if the ISO identifies a violation that requires a system upgrade during analysis performed for the Transitional CNR Group Study?**

**Answer:** Based on the ISO's FERC Order No. 2023 compliance proposal, projects that require an upgrade to address a violation identified by the ISO during the analysis performed for the Transitional CNR Group Study would not be able complete the 2024 interim RA qualification process since any such upgrades would be identified too late for inclusion in the Transitional Cluster Study. Similar to FCA qualification under the current rules, Project Sponsors would be able to request a reduction to the requested capacity for a project by the 'SOI capacity reduction deadline for generation', such that the project could qualify an amount of capacity without the need for upgrades. The ISO would inform Project Sponsors of any violations seen for their projects and the amount of capacity their projects would be able to deliver without an upgrade ahead of the 'SOI capacity reduction deadline for generation', similar to recent FCA qualification processes.

**Q23: Based on the ISO's FERC Order No. 2023 compliance proposal, does my project require a Commercial Readiness Deposit?**

**Answer:** Based on the ISO's FERC Order No. 2023 compliance proposal, pursuant to the FERC Order No. 2023 proposed rules, Generating Capacity Resources and Import Capacity Resources associated with a project subject to the ISO interconnection Procedures must meet the Commercial Readiness Deposit requirements,. A Commercial Readiness Deposit would not be required for projects not subject to the ISO Interconnection Procedures.

**Q24: Based on the ISO's FERC Order No. 2023 compliance proposal, what would happen to the Commercial Readiness Deposit if I withdraw my project from CPS monitoring after the 'collect Commercial Readiness Deposit' deadline, or if my project does not achieve Commercial Operation by June 1, 2028?**

**Answer:** Based on the ISO's FERC Order No. 2023 compliance proposal, projects withdrawn from CPS monitoring, or that fail to achieve Commercial Operation by June 1, 2028 and did not obtain a CSO in the FCM, would have their Commercial Readiness Deposit be subject to the impact assessment described in Section 3.7 of the LGIP, SGIP or ETU IP , and would not be able to keep its established CNRC. The proposed Tariff language accommodates a withdrawal of the CNR component of an IR while maintaining an associated Network Resource (NR) IR.

Under the ISO's proposed rules for compliance with FERC Order No, 2023, where a project subject to the ISO Interconnection Procedures successfully participates in the Transitional CNR Group Study

and completes the 2024 interim RA qualification process, and later obtains CSO in the FCM, the rules for termination of the CNRC will be governed by the relevant FCM rules.

**Q25: Based on the ISO's FERC Order No. 2023 compliance proposal, the submission of ARA 2 bids for the 2025-2026 CCP is scheduled for August 1, 2024 to August 5, 2024, however the schedule shows the ARA 2 results may be posted by September 3, 2024, which is after the September 1, 2024 deadline for establishing CNRC. Can CSO obtained in this RA establish CNRC (pursuant to the current rules), even in the case where the RA results are posted on September 3, 2024?**

**Answer:** Yes, based on the ISO's FERC Order No. 2023 compliance proposal, projects can establish CNRC by obtaining a CSO in ARA 2 for the 2025-2026 CCP, even if the ISO posts the ARA 2 results on September 3, 2024.

**Q26: Based on the ISO's FERC Order No. 2023 compliance proposal, do projects that have not obtained a CSO through an FCM auction before September 1, 2024 need to participate in the 2024 interim RA qualification if they wish to continue to be eligible for RA participation?**

**Answer:** Yes. For example, based on the ISO's FERC Order No. 2023 compliance proposal, a project's associated resource that qualified for FCA 18, elected CPS monitoring, but did not obtain a CSO in FCA 18 or any RAs before September 1, 2024, would not be eligible for RA participation after September 1, 2024, unless the resource successfully completes the 2024 interim RA qualification process (or a future FCA or interim RA qualification process). This example applies to both projects subject to the ISO Interconnection Procedures and projects not subject to the ISO Interconnection Procedures.