



ISO-NE Responses to Transition Related Questions Raised in the Context of Order No. 2023 Compliance Discussions

December 15, 2023

General Notes Applicable to the ISO Responses

Note there is overlap between many of the transition related questions raised on the context of Order No. 2023 received by the ISO. Not all questions received by the ISO are documented below, but the questions and answers documented below attempt to provide responses to all received questions.

The responses in this document reflect the ISO's views of and expected compliance with Order No. 2023 at the time of its publication. These ISO views and proposals may change before the ISO presents its final Order No. 2023 compliance proposal. Participants should continually check for updates, follow the applicable stakeholder committee discussions and review the final version of the rules.

Questions and Responses

Q1: Will ISO-NE complete ongoing System Impact Studies for all Small Generator Interconnection Procedures (SGIP) applications? In general, we would welcome further explanation on how the transition process will be implemented for SGIPs. This will allow developers of SGIP projects to appropriately consider risks and future investments around their projects.

Response: ISO-NE is proposing to conform the SGIP with the proposed Order No. 2023 transition and clustering process.

Q2: How does ISO-NE define a completed SIS? If a customer says they have no comments before the eligibility date but their comment period technically extends past the eligibility date, then would the SIS be considered complete? If a customer provides their final comments before the eligibility date but their comment period technically extends past the eligibility date, then would the SIS be considered complete?

Response: ISO-NE defines a completed SIS as the acceptance of an SIS report by the IC during the comment period, which is within 30 CD of receipt of the SIS report. The IC has that window to provide ISO with any comments or notify ISO that they have no comments on the SIS report and accept it. The 30 CD is a no later than date.

Q3: How does ISO-NE define a completed Facilities Study?

Response: ISO-NE defines a completed FAC as the acceptance of a FAC report by the IC during the comment period, which is within 30 CD of receipt of the FAC report. The IC has that window to provide ISO with any comments or notify ISO that they have no comments on the FAC report and accept it. The 30 CD is a no later than date.

Q4: If a Facilities Study is in progress as of the Eligibility Date, will the customer have the option to waive its completion and go directly into LGIA negotiations? For a customer eligible for the transitional serial facilities study, at what point during the transition would they elect to waive the facilities study and go directly into IA negotiations?

Response: There will be no option to waive the Transitional Serial Facilities Study for projects currently undergoing a Facilities Study. Very few QPs undergo a FAC, as a result, ISO expects few QPs to be eligible for the Transitional Serial Facilities Study. Prior to the Eligibility Date, upon completion of the SIS, the IC may continue to waive a Facilities Study and move straight to IA negotiation.

Q5: Does Order 2023 require that ISO-NE keep accepting IRs until the Effective Date, but any IR submitted after the Eligibility Date would be withdrawn without the option for transition on the Effective Date?

Response: The ISO will not accept any Interconnection Requests submitted after the Eligibility Date until the first Cluster Entry Window Opens in 2025.

Q6: Could the Effective Date be delayed by FERC not accepting the ISO compliance filing?

Response: Yes. The effective date may change depending on when FERC takes action on the ISO's compliance proposal.

Q7: Will the same IR form and IR deposit be required for IRs submitted after the compliance filing date and before the Eligibility Date?

Response: The Tariff redlines posted for the December 21 Transmission Committee meeting contain the proposed deposits and forms.

Q8: Will existing CNR IRs be eligible to enter the CNR portion of the transitional cluster study, or will they need to submit new CNR-only IRs prior to the Eligibility Date?

Response: Requests for CNR Interconnection Service will be eligible to participate in the TCS. This selection can be made when executing the TCS Agreement.

Q9: Will the Transitional Cluster Study include NR and CNR analysis?

Response: Yes.

Q10: Will ISO-NE consider creating a fast track for CNR-only IRs with completed NRIS studies that would occur at the beginning of the transition process? For example, projects that pass the

overlapping impact test without triggering Network Upgrades, could they get a “fast pass” to CNR or CSO or...

Response: See ISO Response to Q26 – [2023 11 17 order no 2023 capacity question and answer.pdf \(iso-ne.com\)](#).

Q11: Is there a Customer Engagement Window during the transition? When will ISO-NE provide a public list of applicants for the Transitional Cluster Study?

Response: No, there is not a Customer Engagement Window during the transition process. After the Eligibility Date, but no later than the Effective Date, projects eligible for the Transitional Cluster Study will be sent a Transitional Cluster Study Agreement. Projects will have 60 days to return the signed the Agreement and provide the necessary deposits, evidence of 100% Site Control, and any additional required data. ISO will continue to provide the information currently available in the Public Queue according to the IRs participating, which does not include a list of project or IC names as required under the Tariff.

Q12: If an IC decides to withdraw its queue position before the Transitional Cluster Study Agreement is executed will it receive a refund of the unspent portions of the deposit money as well as the \$50,000 IR deposit?

Response: Projects that withdraw or are withdrawn between the Effective Date and the execution deadline for the TCS agreement will be refunded any unspent portions of their deposits.

Q13: Does a customer have the ability to make non-material changes to their technical data before commencement of Transitional Cluster Study (similar to current rules about changes prior to the SIS – size reduction and change inverter manufacturer) or would a customer need to submit a new IR prior to the Eligibility Date to make changes?

Response: Yes, changes similar to those currently allowed under Section 4.4.1 would be accepted. Any changes would need to be reflected in the data provided for the TCS and will be subject to review.

Q14: If a customer makes non-material changes to their technical data, would ISO-NE review these changes and then provide a 10-Calendar Day cure period for any deficiencies identified in the modified technical data?

Response: The data will need to be study ready 60 Calendar Days from the Effective Date.

Q15: Will ISO accept cash or letters of credit during the transition process?

Response: Cash will be accepted if needed to true-up any study deposits. Cash or a Letter of Credit may be submitted for relevant readiness deposits.

Q16: Why are study deposits required in addition to the commercial readiness deposits during transition? How much is the Transitional Cluster Study deposit?

Response: Order 2023 indicates that study deposits are required in addition to the Commercial Readiness Deposits. The Transitional Cluster Study deposit will be \$250,000 for each Large Generator or ETU and \$100,000 for each Small Generator in the TCS. The ITO and ISO will determine the Transitional Serial Facilities Study deposit.

Q17: Will ISO-NE consider lowering the transitional cluster study commercial readiness deposit from \$5 million to \$2.5 million because New England does not currently suffer interconnection queue backlogs to the same extent as other regions?

Response: ISO-NE will adopt the Order 2023 requirement of a \$5 million commercial readiness deposit for LGIP IRs entering the transitional cluster study, and will propose a \$1 million deposit for SGIP IRs.

Q18: Will the same study deposits and commercial readiness deposits be required for a CNR-only study as for an NR study during the transition?

Response: ISO will have a presentation of the proposed deposits at the Dec TC.

Q19: If a resource were to request a CNR-only study in the Transitional Cluster Study, what is the earliest CCP that it would be able to obtain a CSO if its COD is prior to June 2025?

Response: See ISO Response to Q1 – [2023 11 17 order no 2023 capacity question and answer.pdf \(iso-ne.com\)](#).

Q20: Is there a transitional FCM qualification cycle that could be run for the CNR-only projects in the transitional cluster that would enable them to participate in early reconfiguration auctions? When during the transition process can a CNR IR qualify for FCA or a reconfiguration auction?

Response: See ISO Response to Q27 - [2023 11 17 order no 2023 capacity question and answer.pdf \(iso-ne.com\)](#).

Q21: How does COD extension work with the transition? If you take the option to extend the COD to 12/31/2027, does the 7 years from IR submittal/3 years from original COD still apply? (For example, your IR is submitted in March 2022 and your original COD is March 2026. If you take the transition COD extension to December 2027, can you further extend it to March 2029 if desired?). Will there be an update on the COD extension now that the compliance filing date is later?

Response: The ISO intends to propose that a COD extension up to 3/31/2028 be available for all projects in the Transitional Cluster Study to account for the later compliance filing date, even those who can no longer extend according to the current 7 years from IR submittal/3 years from original COD under current rules. After submittal of the Transitional Cluster Study package, projects will have the opportunity to extend their COD beyond 3/31/2028 pursuant to Sections 4.4.4 and 4.4.5 of the Interconnection Procedures.

Q22: Can the in-service and initial synch dates be extended commensurate with the COD extension to 12/31/2027?

Response: Yes.

Q23: Would customers in the midst of negotiating their LGIAs on the Effective Date have to provide the deposit required for customers that are entering the transitional serial study process (i.e., 100% of interconnection facility and network upgrade cost estimate from the SIS)?

Response: No, customers in LGIA negotiation on the Effective Date would not have to provide the Transitional Serial Facilities Study commercial readiness deposit. Customers in LGIA negotiation on the Effective Date would need to use the new pro forma LGIA or SGIA, which, upon execution, includes the requirement that the IC submit an LGIA Deposit equal to 20% of the estimated Network Upgrade and Interconnecting Transmission Owner's Interconnection Facilities costs identified in the SIS report.

Q24: Can projects receive any credit for the value of the study already completed to put towards the transitional cluster study deposit?

Response: No, but any remaining unspent portions will be credited towards the Transitional Cluster Study deposit.

Q25: Can a project elect to put the current study on hold while still being eligible to enter the transitional cluster study?

Response: This is still under consideration. Please follow upcoming TC meetings and presentation materials.

Q26: For projects advanced in the study process, which may have spent \$500,000 or more on feasibility and system impact studies, will ISO-NE make every effort to complete those studies using the serial process, including exploring all avenues to expedite studies, and/or to allow additional time to complete studies?

Response: Yes, ISO is attempting to complete as many ongoing studies as possible under current rules, while adhering to the transition process requirements.

Q27: For the Transitional Cluster, and considering projects that already have advanced studies where the study material has some potential to be reused, will ISO-NE consider providing some credit for these projects against the study deposit?

Response: No. Projects will need to submit data consistent with new requirements. Additionally, new study cases will need to be created according to which projects elect to proceed in the TCS. ISO always makes use of the learning from previous studies.

Q28: Will there be a partial study report for projects that started but did not complete SIS or FS?

Response: No partial study reports will be provided.

Q29: Will ISO-NE continue to conduct Feasibility Studies and System Impact Studies until the Effective Date? If a System Impact Study is completed after the Eligibility Date and before the Effective Date, will the customer be eligible to enter the transitional serial facilities study? Why is the ISO not allowing for projects with an SIS completed “shortly” after the eligibility and before the effective date to skip the TCS?

Response: Ongoing study work for IRs for which an SIS is underway as of the Eligibility Date will continue through the Effective Date, but will not effect a project’s status with respect to the Transitional Cluster Study.

Q30: Can ISO provide an estimate of the amount of projects able to complete prior to eligibility date? Will ISO prioritize these projects to be completed in time?

Response: ISO will continue to process ongoing studies to the best of our ability. ICs can follow the updated timelines for their projects through IRTT, but factors such as model behavior/issues with technical data, distribution and sub-transmission studies, restudy due to withdrawal of previously queued projects, and time needed for TO cost and time to build estimates can affect the study timelines.

Q31: Will IR deposits be moved forward to the transition?

Response: All unspent portions of deposits on hand (including the IR deposit) will be credited towards Transitional Study deposits.

Q32: Will ISO-NE refund the study deposits in any way for projects currently in the queue who have already paid study deposits for their SIS study but haven't begun the study process yet?

RESPONSE: If the project chooses to withdraw, then the unspent portions of the study deposit will be refunded. If the project chooses to move into the Transitional Cluster Study, then any unspent portions of the study deposit will go towards the Transitional Cluster Study deposit.

Q33: How will ISO compensate customers who have study deposits spent but no study report provided?

Response: Any unspent portions of deposits will be refunded without penalty if the project withdraws or is deemed withdrawn between the Effective Date and the transitional study start 60 CD from the Effective Date.

Q34: Will the Transitional Cluster Study start date be delayed at all by the ongoing 3rd Maine Regional Integration Study or the Cape Cod Cluster System Impact Study?

Response: No.

Q35: Will the Transitional Cluster Study start date need to be after the Transitional Serial Studies are completed?

Response: No, since projects eligible for the Transitional Serial Facilities Study will have a completed SIS, any such projects will be included in the Base Case for the Transitional Cluster Study.

Q36: Is there an opportunity for projects to withdraw from the Transitional Cluster Study without penalty if the upgrades are too high?

Response: No.

Q37: Can a customer reduce their project size after the Transitional Cluster Study is complete?

Response: The IC can submit changes through the Material Modification Determination process after the completion of the TCS, but these types of changes cannot impact the findings of the TCS. In other words, an IR cannot be reduced in size for the purpose of avoiding or reducing upgrades.

Q38: Is there a Transitional Cluster Restudy?

Response: There is no TCS Restudy period defined in the LGIP.

Q39: Do you see an opportunity for customers to seek a more refined cost estimate of upgrades during the transition as they can in the end-state cluster process? Is there a facilities study for projects in the Transitional Cluster Study?

Response: There is no opportunity for a FAC after the TCS. Once the final TCS report is issued, the IC proceeds directly to Section 11 of the LGIP, which is IA negotiation.

Q40: What will the Transitional Serial Facilities Study look like?

Response: Please see transition process timelines presented at the [November TC](#).

Q41: Will projects in the Transitional Serial Facilities Study be studied in queue order/retain the queue position that they received prior to transition?

Response: Projects that have a completed SIS on the Eligibility Date would retain their QP.

Q42: What is the level of accuracy for the Transitional Serial Facilities Study?

Response: +/- 20% to be completed in 90 CD from the execution of the TSIFS agreement.

Q43: If the transitional study withdrawal penalties are equal to nine times all the study costs incurred under the current Tariff prior to the transition as well as the cost of the transitional cluster study, then would ISO consider an independent entity variation to make the withdrawal penalty not include the pre-transition study costs?

Response: No, ISO-NE will adopt the requirements of Order 2023 that set the withdrawal penalty equal to nine times all the study costs incurred under the current Tariff prior to the transition as well as the cost of the Transitional Cluster Study.

Q44: Will projects be able to move ahead with executing an LGIA for their NRIS in parallel with entering the transitional cluster to obtain CNRIS?

Response: Yes, projects with a completed SIS will be able to proceed with IA development during the transition while their request(s) for CNRIS are being studied.

Q45: Can ISO provide more information about how DER ASO studies will be affected by transition?

Response: All DER/ASO studies that have received Section 1.3.9 approval within 90 days of the base case development for the TCS, will be included in the Base Case for the TCS. DER/ASO studies that are not completed as of this point will have to respect the TCS.