



Conceptual RENEW Order 2023 Amendments

December 18, 2023

RENEW has developed the below six conceptual amendments to the ISO's Order 2023 compliance proposal.

RENEW Amendment #1: Allow customers to revert from a CNR interconnection request to an NR interconnection request after seeing the results of the cluster study (page 2)

RENEW Amendment #2: Allocate study costs separately for NRIS and CNRIS portions of the cluster study (page 4)

RENEW Amendment #3: Perform a serial CNR-Only study as part of the serial transition study process. (page 7)

RENEW Amendment #4: Clarify that a list of both NR and CNR contingent facilities will be included in the cluster study and restudy reports. (page 11)

RENEW Amendment #5: Create a Customer Engagement Window Within the Transitional Cluster Study Process Without Extending the Transition Timeline (page 12)

RENEW Amendment #6: Add an exemption to withdrawal penalties in the situation where an Interconnection Customer received incorrect or misleading information in the scoping meeting (page 14)

We look forward to presenting these to the NEPOOL Transmission Committee at its December 21 or January 4 meeting, and would welcome any positive feedback, constructive criticism, or suggestions at any time to Francis Pullaro (fpullaro@renew-ne.org) and Abigail Krich (krich@boreasrenewables.com).

We are still reviewing the redlines ISO posted on Dec 8, and depending upon what we see in those redlines and what is discussed at the December 21 TC meeting, we may share additional amendments at the January 4 meeting.

RENEW Amendment #1: Allow customers to revert from a CNR interconnection request to an NR interconnection request after seeing the results of the cluster study

Based on Question 16 from RENEW's 10/20/23 capacity questions/comments submitted to ISO.

What ISO is proposing

ISO proposes that a customer with a CNR interconnection request (that is, a request for both energy and capacity interconnection service) must either complete the process for obtaining both energy and capacity interconnection service or must fully withdraw from the cluster. If a resource that requested CNR interconnection service determined after reviewing the cluster study results that their project would be viable to move ahead with an energy-only interconnection but would not be viable to moving ahead with its incremental capacity upgrade requirements, this project would be required to withdraw entirely from the cluster.

RENEW's proposed amendment

Allow CNR Interconnection Requests to downgrade their requested service to NRIS after reviewing the results of the cluster study (or transitional cluster study) or after reviewing the results of the restudy or facilities study if the capacity-related upgrade cost estimate has increased by more than a specified threshold from the initial cluster study. [Perhaps charge some kind of withdrawal penalty for such a service downgrade to discourage customers from taking this as a "free option" if they are not initially serious about wanting both energy and capacity interconnection service.]

Reasoning for the amendment

In ISO's proposal, if a customer seeking NRIS (energy-only interconnection) learns through the cluster study that the upgrades are more extensive than expected such that their project is no longer viable and it cannot move forward in the interconnection process, they have the option to withdraw from the cluster (with a penalty). RENEW believes this is a logical option, as withdrawal is the only appropriate option for a project that is not viable.

On the other hand, in ISO's proposal, if a customer seeking CNRIS (energy and capacity interconnection) learns through the cluster study that the upgrades for an energy-only interconnection are reasonable and the project is viable to move ahead as energy-only, but the study shows that the upgrades for capacity deliverability would make the project non-viable, then at that point ISO is saying the project must either continue with its energy and capacity interconnection or fully withdraw. Since the cost of the capacity upgrades would make the project non-viable, its only option at that point is to withdraw.

This otherwise viable energy-only project must then decide whether to abandon its development or try going into the next cluster seeking an energy-only interconnection. The latter would slow the project down by 18 months or more, cost a significant amount of money

between the withdrawal penalties and additional study fees, and put the project at risk that the upgrade requirements in the next cluster could differ.

This implications for the cluster of forcing a viable energy-only project to withdraw are also not good. Though the project's withdrawal of its capacity interconnection request could cause a change in the capacity upgrades required or the cost allocation of capacity upgrades, this outcome is unavoidable as the project is not viable with its capacity upgrades and cannot move forward with a capacity interconnection. Forcing the project to also withdraw from the cluster its request for energy interconnection could also trigger the need for restudy, changing upgrade requirements, and shifting costs for NR upgrades onto other cluster projects, which in turn could lead to cascading withdrawals. If the project were instead allowed to continue as an energy-only project, there would be no restudy or cost shifting among energy interconnection customers in the cluster.

Though Order 2023 is intended to reduce speculative interconnection requests and their subsequent withdrawals, the Commission never described that the intention was to require customers to write a blank check in order to enter the interconnection study process. There is no way for a customer to reliably estimate its CNR upgrade costs before entering the cluster study process given the unknown of what other customers will be in the cluster with them.

While RENEW appreciates the difficulties related to uncertainty in the cluster and the desire to prevent cascading withdrawals, RENEW believes that the ISO proposal would exacerbate this concern rather than minimizing it. The ISO's proposal that requires CNR customers to complete both their energy and capacity interconnection or none at all is an unreasonable structure that will prevent viable projects from being able to move forward to commercial operation on a timely basis and will result in additional withdrawals, re-allocation of costs, and further withdrawals.

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RENEW Amendment #2: Allocate study costs separately for NRIS and CNRIS portions of the cluster study

Based on question 6 from RENEW's 10/20/23 capacity questions/comments sent to ISO

What ISO is proposing

ISO proposes to identify NRIS (energy interconnection) upgrades first and allocated the cost of those upgrades amongst the NRIS requests. After the NRIS upgrades have been identified and incorporated into the study case, ISO would then identify any incremental upgrades required for the requested CNRIS and allocate those costs amongst the CNRIS requests. In its FAQ document posted 11/17/23, ISO indicated that all of the cluster study costs, including the cost of identifying the NRIS upgrades as well as any incremental CNRIS upgrades, would be allocated amongst all members of the cluster, regardless of their requested interconnection service type. Under the ISO proposal, half of cluster study costs are allocated on a per-capita basis amongst all members of the cluster (regardless of interconnection service type), and half of the study costs are allocated on a per-MW basis amongst all members of the cluster (for those requesting energy-only or energy+capacity interconnections, this would be based on their summer energy interconnection service level, while for those requesting capacity-only interconnections, this would be based on their summer capacity interconnection service level).

This means that customers requesting an energy-only interconnection (NRIS) would be allocated a portion of the cost of identifying incremental upgrades required for the CNRIS requests, from which they do not benefit in any way. It also means that customers requesting to add capacity interconnection service to their existing energy interconnection service (CNRIS-only) would be allocated a portion of the cost of identifying the NRIS upgrades, from which they do not benefit as they already have their NR interconnection.

RENEW's proposed amendment

RENEW proposes that ISO track the NRIS and CNRIS study costs separately for both the Transitional Cluster Study and the post-transition cluster studies such that the NRIS study costs can be allocated amongst the NRIS customers and the CNRIS study costs can be allocated amongst the CNRIS customers (both CNRIS and CNRIS-only).

Reasoning for the amendment

ISO explained in their 11/17 Capacity FAQ that it is appropriate for all cluster members to share in the full study costs because establishing the base case is required for both the NRIS and CNRIS study. They also noted that the identification of NRIS upgrades is an input to the CNRIS portion of the study, so in their view the CNRIS-only customers both require and benefit from the NRIS study work. Further, ISO cited P421 of Order 2023 which says that tracking cluster study costs for each interconnection customer separately would increase the administrative burden on ISO, offer little benefit, and likely could not be done accurately.

Establishing the NRIS base case is required in order to identify the NRIS upgrades. However, a different base case must be constructed for the CNRIS portion of the study; one which does not include energy-only interconnections and reflects the CNR service level of all capacity interconnection customers rather than the NR service level reflected in the NRIS base case. It is appropriate to allocate the cost of establishing the NRIS base case to customers requesting NRIS (NRIS and CNRIS customers) and to allocate the cost of establishing the CNRIS base case to customers requesting CNRIS (CNRIS and CNRIS-only customers).

There may, however, be some costs that are common to all customers, like holding the scoping meeting. These costs are likely to be relatively minimal compared to the overall study costs. Such common costs could be divided between the two buckets or tracked as a third category that is allocated amongst all customers regardless of interconnection service type.

RENEW believes that forcing NRIS customers to pay for CNRIS study work, and forcing CNRIS-only customers to pay for other customers' NRIS study work, is inappropriate, would create a barrier to entry, and is not what FERC was describing when they said that it wouldn't be reasonable to account for individual customers' study costs.

As ISO described the study process, they will first complete the study work to identify all upgrades required to provide NRIS to customers requesting this service, and then they will identify any incremental upgrades required to provide CNRIS to those customers requesting CNRIS. Saying that CNRIS-only customers benefit from the NRIS study work is like saying that projects seeking FCA qualification today are beneficiaries of the interconnection studies that other customers have previously performed, yet resources seeking FCA qualification today are not asked to pay for other projects' interconnection studies. Bifurcating the cluster study costs into NRIS and CNRIS buckets, when the two stages of the study work happen serially, is not unreasonable. The administrative burden of tracking expenses in two (or at most three) separate categories is minimal and reasonable, would offer benefit to customers, and could be done accurately.

There is at least one if not two orders of magnitude difference in the historical study costs of an NRIS SIS (typically six figures) and a CNRIS overlapping impact test (typically four figures). CNRIS-only study costs will likely be substantially higher in this new process than they are today given that ISO will be required to identify capacity-enabling upgrades in the cluster process whereas in the current FCM qualification process ISO does not actually identify upgrade requirements for complicated capacity interconnections. Even so, we would expect there to be a large difference in the cost of these two pieces of the cluster study. Requiring a capacity-only interconnection request to pay six-figures for a capacity deliverability study would create an unnecessary financial barrier to entry to the capacity market which would reduce competition and efficiency in the market.

Lastly, because the withdrawal penalty amount is nine times study costs for the transitional cluster and two times study costs for withdrawals during the initial Cluster Study phase of the post-transitional process, the impact of allocating what we believe are NR study costs to CNR-only customers is amplified. In the ISO's proposal, CNR-only customers would be allocated

study costs that we believe they had nothing to do with, and then on top of this they would have to pay either twice or nine times those inappropriately allocated study costs if they ended up withdrawing.

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RENEW Amendment #3: Perform a serial CNR-Only study as part of the serial transition study process.

Based on T15 from RENEW's 10/23/23 Transition questions/comments submitted to ISO and building upon New Leaf's Proposal #5 presented at the October 17, 2023 TC

What ISO is proposing

Projects under development that had planned to go through the FCA 19 qualification process were expecting to learn on 9/27/24 of their capacity market qualification acceptance or denial as well as any system upgrades that were identified as required to enable their capacity deliverability. If qualified, they would be able to receive a Capacity Supply Obligation (CSO) in FCA 19 which was scheduled to start on 2/3/25. If they planned an early COD, prior to 6/1/28 when the nineteenth Capacity Commitment Period starts, they would also have then been able to elect Critical Path Schedule monitoring between 10/28/24 and 11/4/24 in order to be eligible to participate in reconfiguration auctions for earlier commitment periods. With FCA 19 being delayed by one year, these early-COD projects would not be able to elect critical path schedule monitoring until November 2025, leaving them unable to participate in reconfiguration auctions between November 2024 and November 2025.

As part of the FCA 19 delay filing, ISO proposed an interim qualification process for resources with a COD prior to June 1, 2026 that have not yet acquired a CSO to seek qualification to participate in the annual reconfiguration auction for capacity commitment period 2025-2026 as well as monthly reconfiguration auctions for the later part of the 2024-2025 commitment period. These resources would go through a qualification process in 2024 on the same schedule that would have been used for FCA 19 qualification had the auction not been delayed. Though this interim qualification process would allow these projects to participate in the early reconfiguration auctions, they would not be able to lock in their capacity interconnection service upon obtaining a CSO in these reconfiguration auctions, as the process has always worked in the past. This is because ISO would have to create the transitional cluster study base case prior to these projects obtaining CSOs in the reconfiguration auctions, and the cluster study base case would not include these projects and any of their capacity-related system upgrades before they obtain a CSO. Thus, after going through the interim qualification process to participate in reconfiguration auctions, these projects would also need to go through the capacity portion of a cluster study (either the transitional cluster or a later cluster) in order to lock in their capacity interconnection service and be eligible to participate in future FCAs. To be eligible to participate in FCA 19, they must go through the transitional cluster study in order to obtain capacity interconnection service and be eligible to go through the delayed FCA 19 qualification process. If they wait for the first non-transitional cluster study, this would be too late for FCA 19 participation, and it's not yet clear whether it would enable FCA 20 participation or if it would delay the project's FCA participation to FCA 21 (given the 1-year FCA cycle and the likely ~18 month cluster study cycle).

For projects in development that had planned to seek qualification for FCA 19 that do not have a COD prior to June 1, 2026, going through the transitional cluster study as ISO has proposed it would result in the customer seeing interim study results on March 27, 2025, 181 days later

than they had expected to learn of their capacity market acceptance or denial had FCA 19 not been delayed. These transitional cluster study members would receive their draft interconnection agreement on July 25, 2025, 172 days after these projects had expected to participate in FCA 19 to lock in a CSO and capacity interconnection service. This six-month difference results in extended uncertainty for these projects about their ability to qualify to offer capacity, which for some projects will delay their ability to obtain financing and move ahead with development.

RENEW's proposed amendment

RENEW proposes that ISO incorporate a serial CNR-Only study as part of the serial transition study process. The serial transition study process is limited to resources with completed NRIS studies, and we envision this being open to projects that have a completed SIS and a valid CNR or CNR-only interconnection request, with or without an executed interconnection agreement. This serial CNR-Only transition study would replace the interim reconfiguration auction qualification process that ISO has proposed to create as part of its FCA 19 delay filing.

Under this proposal, eligible resources for the serial transition study would have the option to:

- request a serial Facilities Study (included in ISO proposal),
- request a serial CNR-Only study (new with this amendment),
- request both a serial Facilities Study and CNR-Only study,
- request to skip these transitional serial studies and proceed to an expedited interconnection agreement if they do not yet have an interconnection agreement (included in ISO proposal),
- request to have their CNR-only request studied as part of the transitional cluster (included in ISO proposal), or
- withdraw without penalty (included in ISO proposal).

Here is one possible way that this could be structured without impacting the transition study schedule:

ISO would perform this CNR-only study as a serial study, where pre-transition queue priority order would be respected (as called for in O2023 for the transitional serial study). This would allow ISO to use the same study process as in the existing overlapping impact test. If an overload were identified as requiring a network upgrade, this would be grounds for the resource to be ineligible for obtaining capacity interconnection service through this serial transition study process. Such a project would need to go into a cluster study (either the transitional or a post-transitional cluster study) to have their upgrades identified and obtain capacity interconnection service. If no upgrade requirements were identified, then the project would be able to proceed to executing an Interconnection Agreement that included CNRIS.

The serial CNR-only study would occur during the same window of time allotted for the serial Facilities Studies. In the ISO's proposal, on May 31, 2024 ISO would issue the transitional serial study agreement, the customer would return the agreement, deposit, and site control by July

30, 2024, and ISO would issue the transitional serial study report by October 28, 2024. Because no network upgrade requirements would result from the serial CNR-only study, the results of this serial CNR-only study would not impact the NRIS portion of the cluster transition study which ISO proposes would be happening in parallel with the serial transition study. The CNR portion of the transitional cluster study would not begin prior to October 28, 2024, so the results of the serial CNR-only study could be reflected in the study case that gets created for the CNR portion of the transitional cluster study without any delay to that study process.

The serial transition study agreement could be structured such that any project in the CNR-only serial transition study that triggers a need for an upgrade could default back to the transitional cluster study for CNR-only service. This is not necessary, but could enable more projects to move ahead sooner and be available to participate in FCA 19.

A customer electing this serial CNR study should be required to submit the same deposits and other requirements like site control that would be required of a customer entering the transitional cluster study for CNR-only interconnection service. This way, if the project were unable to obtain interconnection service from the serial study and had to default back to the transitional cluster study, it would have already submitted everything necessary to ISO.

As with all other transitional studies, the withdrawal penalty for a resource that goes through the transitional serial CNR-only study would be nine times its transitional study cost.

After the serial CNR-only study is completed October 28, 2024 the customers in that study would have the option to elect critical path schedule monitoring by November 4, 2024, as would have been allowed in the interim reconfiguration auction qualification process included in the FCA 19 delay filing. This would enable projects with early CODs to participate in the third annual reconfiguration auction for the 2025-2026 commitment period in Q1 2025 as well as remaining monthly reconfiguration auctions for the 2024-2025 commitment period. It would also allow these projects to lock in their capacity interconnection service, unlike in the FCA 19 delay proposal.

Reasoning for the amendment

The intent of including a CNR-only serial study as part of the serial transition study process would be twofold. As New Leaf described, it would allow late-stage projects with completed NRIS studies to lock in their eligibility for participation in the FCM so that they could pursue financing. It would also allow projects with early CODs to be both eligible for participation in 2025 reconfiguration auctions and to lock in capacity interconnection service. The proposal that was included in the FCA 19 delay filing allows these early-COD resources to qualify to obtain a CSO in 2025 reconfiguration auctions, but does not allow them to lock in their capacity interconnection service when they obtain these CSOs. This CNR-only serial transition study would replace the process described in the FCA 19 delay filing and would resolve that shortcoming.

The intent of the transition in Order 2023 appears to be to allow late stage projects that are ready to go to get through the interconnection process fast rather than getting slowed down. This would be a way to meet this intent for capacity market participation.

Supportive language from the Order for a mechanism like this: P856. "... We concur with NRECA that the NOPR's proposed transition process will create an efficient way to prioritize and process interconnection requests, based on how far they have advanced through the interconnection process and their level of commercial readiness. We further find that the transition process, as adopted herein, appropriately balances the need to move expeditiously to the new cluster study process with the need to respect the investments and expectations of interconnection customers at an advanced stage in the existing interconnection process.¹⁶³⁴"

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RENEW Amendment #4: Clarify that a list of both NR and CNR contingent facilities will be included in the cluster study and restudy reports.

Based on Question 5 from RENEW's 10/20/23 capacity questions/comments submitted to ISO.

What ISO is proposing

ISO's proposed Section 3.8 of Schedule 22 (the LGIP) on identification of contingent facilities says "System Operator shall identify Contingent Facilities before the execution of the LGIA... Contingent Facilities that are identified during the evaluation of the Interconnection Request shall be documented in the ~~Interconnection System Impact~~ Cluster Study report or the LGIA for the Large Generating Facility.". It is not clear from this language a) whether these facilities will affirmatively be identified and then listed in the cluster study reports or will only be listed in the reports if incidentally identified during the cluster study, or b) whether both NRIS and CNRIS contingent facilities will be identified and listed in the report.

As described in that section, contingent facilities are Interconnection Facilities and Network Upgrades associated with higher Queue Positions or planned/proposed transmission projects that are not yet in service but upon which the Interconnection Request's costs, timing, and study findings are dependent, and if delayed or not built, could cause a need for restudies of the Interconnection Request or a reassessment of the Interconnection Facilities and/or Network Upgrades and/or costs and timing.

RENEW's proposed amendment

RENEW would like to see the language in Section 3.8 of Schedule 22 clarified to indicate that both NR and CNR contingent facilities will be identified as part of the cluster study and listed in the cluster study report (or restudy and restudy report).

Reasoning for the amendment

Order 2023 proforma language for Section 3.8 of Schedule 22 says "Transmission Provider shall post in this section a method for identifying the Contingent Facilities **to be provided to Interconnection Customer at the conclusion of the [System Impact] Cluster Study...**"

Particularly given the new Cluster Readiness Deposits and Withdrawal Penalties that ramp up with each step of the new process, RENEW believes it is important that this information be provided with the study reports so that customers can make fully informed decisions about whether to move ahead to the next stage in the process or withdraw. Providing this information in the interconnection agreement is too late for customers to be able to make informed decisions at the earlier decision points in the process.

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RENEW Amendment #5: Create a Customer Engagement Window Within the Transitional Cluster Study Process Without Extending the Transition Timeline

Based on Question T2 from RENEW's 10/23 transition questions/comments submitted to ISO.

What ISO is proposing

The post-transitional cluster study process includes a 60-day customer engagement window following the cluster entry window. Within this customer engagement window, the ISO notifies customers of all of the Interconnection Requests that are potentially eligible to join the cluster including their requested interconnection service levels, the ISO issues NDAs and convenes a scoping meeting at which customers may ask questions and receive detailed feedback about their proposals. With the benefit of this information, the customers can then make a final decision about whether to execute the cluster study agreement and submit the study and customer readiness deposits.

The transitional cluster study process laid out in the Order and ISO's compliance proposal does not benefit from this customer engagement window. All customers with an active queue position as of the transition eligibility deadline (currently proposed as May 1, 2024), would be identified as *potentially* eligible for the transitional cluster study. ISO is required to tender all of these customers a transitional cluster study agreement by the effective date (currently proposed as May 31, 2024). These agreements must be executed within 60 calendar days or else the Interconnection Request is withdrawn.

As these customers consider whether to execute their agreements to enter the transitional cluster study, ISO proposes that they will have access to the information in the public queue but nothing further.

RENEW's proposed amendment

Create a transitional customer engagement window, as described below, within the sixty calendar day period of time between when ISO issues the transitional cluster agreements and the deadline for customers to execute those agreements.

On the effective date (May 1, 2024), along with the transitional cluster study agreements, ISO should distribute NDAs to potentially eligible cluster members, such that ISO could then convene a group scoping meeting (for those customers who have executed the NDA) within the following 60-day period.

On the effective date (May 1, 2024), or within 10 business days of it, ISO should make available to the customers potentially eligible to join the transitional cluster the same information that would normally be provided to potential cluster members 10 days after the start of the post-transition customer engagement window, including the net summer and net winter NRIS being requested by all potential members of the cluster, as well as the net summer CNRIS being requested.

ISO does not currently have the CNRIS levels being requested by CNR or CNR-Only interconnection customers in the queue, as the current process has customers submit these requested values during the FCA qualification process (subject to a cap of the NRIS service level requested in the interconnection process). In order to share with potentially eligible cluster entrants what the requested CNRIS levels are, ISO would need to obtain this information from all potentially eligible transitional cluster members. RENEW recommends that ISO require customers with active CNR or CNR-Only interconnection requests to provide this information to ISO by the May 1 effective date (or else be subject to either withdrawal or a downgrade from a CNR to an NR service request). ISO would then be able to inform potential transition cluster members about the requested CNR service levels within 10 business days of the May 1 effective date.

Reasoning for the amendment

RENEW believes there should be a similar customer engagement window for the transitional cluster study that would fall within the 60-day timeframe between ISO issuing study agreements and the deadline for customers to execute these agreements. Because the engagement window would occur within the scheduled time for customers consider whether to sign their study agreements, it would not slow the process down. It would however allow customers to have better information in order to make their decision about whether or not to seek entry into the transitional cluster and what level of service to request.

Though it would be possible for eligible customers to review the information in the public queue that lists all active interconnection requests, this information is insufficient for decision-making purposes when considering entry into the transitional cluster. Currently the ISO's public interconnection queue lists three quantities related to each customer's requested amount of interconnection service: Net MW, Summer MW, and Winter MW. This information alone would be inadequate to inform interconnection customers going into a cluster study about the potential makeup of the cluster and the risk of NR or CNR upgrade requirements being identified. Customers should have access to the net summer and net winter NRIS being requested by all potential members of the cluster, as well as the net summer CNRIS being requested, as any one of these three values could trigger the need for upgrades.

Though requiring customers to provide their requested CNRIS values to ISO on May 1, 2024 rather than as part of their executed cluster study agreement due by June 30, 2024 moves forward some of the decision-making and information collection, this transitional cluster engagement window would improve the decision-making abilities of customers deciding whether or not to enter the transitional cluster study. It would allow customers to make better-informed decisions about whether to join the transitional cluster, and should reduce the risk of withdrawals and restudies after the initial transitional cluster study is completed.

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RENEW Amendment #6: Add an exemption to withdrawal penalties in the situation where an Interconnection Customer received incorrect or misleading information in the scoping meeting

New, not based on feedback previously submitted to ISO.

What ISO is proposing

In the cluster study process, ISO will convene a group scoping meeting including the Interconnecting Transmission Owners and all Interconnection Customers. Based on the information shared in that scoping meeting, customers will decide whether to move ahead into the initial cluster study. Once a customer moves into the initial cluster study, withdrawal penalties are applied if they withdraw, with a small number of exceptions.

RENEW's proposed amendment

Add to the list of exceptions for which a customer would not be charged a withdrawal penalty for the situation where a customer can demonstrate that they received incorrect or misleading information in the scoping meeting from either ISO or the Interconnecting Transmission Owner that was material in nature such that, had the customer had the correct information at the time of the scoping meeting, the customer would have withdrawn its interconnection request rather than entering the initial cluster study.

Reasoning for the amendment

Interconnection Customers take significant risk in the interconnection process. They must make decisions based on the information available to them about whether to proceed in the interconnection process. Given the increased risk of withdrawal penalties in this new structure, RENEW believes it would be appropriate to create an exception in the case where a customer made the decision to proceed into the initial cluster study based on information provided by ISO or the Interconnecting Transmission Owner at the scoping meeting that was later, in the course of the initial cluster study, determined to be incorrect or misleading. This is not to suggest that any party would intentionally or knowingly provide incorrect or misleading information, but even with the best of intentions it can happen that incorrect information is shared. When this happens today, the interconnection customer must deal with the variety of consequences, but is not charged a withdrawal penalty. With the introduction of a withdrawal penalty, it is appropriate to create an exception for this to protect everyone in the process.

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