

# Order 2023 Compliance

## Amendment #1

February 15, 2024

# Order 2023 Priority Stakeholder Proposals

## United Proposals # 1-3

- #1: Establish an interconnection reforms working group and reporting requirements to reduce timelines.
- ~~#2: Implement a robust and transparent Alternative Transmission Technology (ATT) evaluation process.~~
- #3: Provide a single and limited opportunity for eligible ICs to reduce project size

## \*RENEW Northeast Proposals # 1-3

- #1: Create an as-available capacity interconnection request option
- #2: Allocate study costs separately for NRIS and CNRIS portions of the cluster study
- ~~#3: Allow resources with a completed SIS to qualify for capacity market activities through FCA 19 in 2024~~

## New Leaf Energy # 1 & # 6

- #1: Continue to advance studies for late-stage projects in the interim, before transitional studies begin
- ~~#6: Improve transparency regarding cluster and/or subgroup study methodologies, as well as cost allocation methodologies.~~

# Order 2023 United Amendment Summary

## United Proposals

1. **\*Proposal #1: Establish an interconnection reforms working group and reporting requirements to reduce timelines.**
2. ~~Proposal #2: Implement a robust and transparent Alternative Transmission Technology (ATT) evaluation process.~~
3. **\*Proposal #3: Provide a single and limited opportunity for eligible ICs to reduce project size**
4. ~~Proposal #4: Explicitly include Dynamic Line Rating as an approved ATT.~~
5. ~~Proposal #5: Right-size the \$5M readiness deposit to \$2.25M.~~

\* **Green** indicates amendment up for vote;  
~~strike-throughs~~ have been withdrawn

# Proposal #1: Establish an Interconnection Reforms Working Group (WG) and Reporting Requirements to Reduce Timelines

**Proposal Summary Table**

Why we need a WG	Benefits of a WG	The WG <i>could</i> be:	The WG would <i>not</i> be:
<ul style="list-style-type: none"> <li>• Most or all other RTOs have dedicated sub-committees or WGs for interconnection and have already made more recent reforms to their interconnection processes relative to ISO-NE</li> <li>• FERC ordered the cluster cycle process should be <b>annual</b>, but ISO’s proposed timeline is <b>475 days</b> (that is <i>without</i> restudy or facilities timelines, which extend timelines further). See ISO <a href="#">slides 17 and 19</a></li> <li>• Order 2023 sought to accelerate interconnection study and processing timeframes and while other regions will comply, our timelines are still excessive and noncompliant, indicating there is work to be done that a WG could help address</li> </ul>	<ul style="list-style-type: none"> <li>• Produce better overall interconnection process</li> <li>• ISO will get valuable input and identification of improvements from developers; they also could learn how to better manage the process for future projects</li> <li>• FERC goodwill for ISO in being proactive</li> <li>• Developer goodwill for ISO (Order 2023 primarily issued in response to clean energy developer concerns)</li> </ul>	<ul style="list-style-type: none"> <li>• Collaboratively addressing issues of broad applicability in the interconnection process</li> <li>• Implement with an appropriately narrow scope.</li> <li>• Informal add-on to TC meetings where agenda is light</li> <li>• Could be a formal working group of TC</li> <li>• To focus on whether the process is working. What is working well? What is not working as well as it might? What could be improved? What improvements? (including from ISO, ITOs, project developers)</li> <li>• Could be done at some appropriate point after some experience with Transitional Cluster but before initiation of end-state Cluster Window opening</li> <li>• <b>Potential topics</b> (see slide 11 for detail) include cluster study timelines reductions; evaluating restudy process; improving study methodology transparency and upfront information access; examining the impact on ASO and DG capacity deliverability process; ATTs /GETs; improved cost estimation and transparency; continued education and study of best practices in other jurisdictions</li> </ul>	<ul style="list-style-type: none"> <li>• Not intended as a gripe session or dispute resolution format</li> <li>• Not looking at specific projects, but instead looking generically at the process and substance of interconnection as the system continues to evolve</li> <li>• An indefinite use of time and resources with an open ended scope and mission</li> </ul>

# Proposal #1: Establish an Interconnection Reforms Working Group and Reporting Requirements to Reduce Timelines

## Why we need a Working Group (WG) and Reporting Requirements

**ISO's proposed timelines significantly exceed the requirements of FERC's Order. Ongoing discussion of further reforms is needed to identify opportunities to streamline the process and bring it in line with FERC's expectations and the region's pressing need to bring resources online more efficiently.**

- FERC ordered the cluster cycle process should be **annual**, but ISO's proposed timeline is **475 days** (that is *without* restudy or facilities timelines, which extend timelines further). See ISO [slides 17 and 19](#).
- There are future reforms needed to interconnection beyond Order 2023 that a WG could help address.
- Most or all other RTOs have dedicated sub-committees or WGs for interconnection and have already made more recent reforms to their interconnection processes relative to ISO-NE.
- **Reporting requirements** will ensure ISO attends to the matter of reducing its non-compliant cluster timeline and render an assessment that will inform the Working Group on ISO's progress in completing studies on time and where bottlenecks lie so that stakeholders can problem-solve with the ISO and work to reduce the duration of studies collaboratively.

# Proposal #1: Establish an Interconnection Reforms Working Group and Reporting Requirements to Reduce Timelines

## **Nature of the Working Group**

- Collaboratively addressing issues of broad applicability in the interconnection process
- Will focus on whether the process is working and ask: What is working well? What is not working as well as it might? What could be improved? What are the improvements?
- Could be a formal working group of TC and include the ISO, TOs, and project developers.
- Could be done at some appropriate point after some experience with Transitional Cluster but before initiation of the standard Cluster Window opening

## **The Working Group would *not be*:**

- Not intended as a gripe session or dispute resolution forum
- Not looking at specific projects, but instead looking generically at the process and substance of interconnection as the system continues to evolve
- Not an indefinite use of time and resources with an open-ended scope and mission

# Proposal #1: Establish an Interconnection Reforms Working Group and Reporting Requirements to Reduce Timelines

## Benefits of a Working Group

- Produce better overall interconnection process and results
- ISO will get valuable input and identification of improvements from developers; they also could learn how to better manage the process for future projects. Conversely, developers will better understand ISO's concerns/limitations and pain points, and receive education on challenging or unclear parts of the process
- Proactive, region-specific identification of improvements

## Potential Working Group Topics

- **Cluster study timelines reductions:** How is study automation being used to facilitate timely study completion? How can it be used?
- **Restudy process:** How do we collectively reduce the chance of restudies?
- **Study methodology transparency and upfront information access:** i.e. Heat Map development, unit cost guide, or other informational tools that could help ICs assess Interconnection viability
- **Interconnection Customer education**
- **ISO-NE Cluster / Internal DG ASO Coordination:** i.e. DG capacity deliverability process
- **ATTs /GETs:** i.e. role and use in interconnection
- **Continued education regarding best practices:** i.e. study of best practices in other jurisdictions
- **Customer Engagement Window Process/preparation:** i.e. how to ensure a single region-wide Scoping Meeting efficiently yields actionable insights)
- **Interconnection-related Planning Procedures development**

# Proposal #1: Establish an Interconnection Reforms Working Group and Reporting Requirements to Reduce Timelines

## **For the Working Group, we recommend ISO state in compliance filing cover letter to FERC:**

“ISO-NE commits to establish and facilitate an Interconnection Working Group ahead of the first Transitional Cluster Study Report to work on further process improvements. The Working Group will serve as an ongoing stakeholder collaboration that evaluates and implements process changes to reduce timelines and improve issues of broad applicability impacting the overall efficiency and functionality of the interconnection process.”

## **Reporting Requirements Tariff Redline Language, add subsection (G) to S. 3.5.2.1 of LGIP**

“Starting after the first standard cluster process, within 90 Calendar Days of completing the Cluster Study Report, System Operator shall provide a report assessing the opportunities and challenges to reduce cluster study timelines. System Operator shall post a report with its assessment publicly and discuss the report’s findings at a meeting with stakeholders. This reporting requirement would end if and when System Operator complies with FERC’s Cluster Study duration requirements (150-days).”



# Proposal #1: Establish an Interconnection Reforms Working Group and Reporting Requirements to Reduce Timelines

## 3.5.2.1

Redline

[Adds](#)

[subsection](#)

[\(G\)](#) to S.

3.5.2.1 of

LGIP

(F) Percentage of ~~Interconnection Feasibility Cluster~~ Studies exceeding two hundred and seventy (270) ~~ninety (90)~~ Calendar Days to complete this reporting quarter, calculated as the sum of 3.5.2.1(B) plus 3.5.2.1(C) divided by the sum of 3.5.2.1(A) plus 3.5.2.1(C).

(G) Starting after the first standard cluster process, within 90 Calendar Days of completing the Cluster Study Report, System Operator shall provide a report assessing the opportunities and challenges to reduce cluster study timelines. ISO shall post the report with its assessment publicly and discuss the report's findings at a meeting with stakeholders. This reporting requirement would end if and when System Operator complies with FERC's Cluster Study duration requirements (150-days).

**3.5.2.2 ~~Interconnection System Impact Cluster ReS~~studies Processing Time.**

# Thank you

Please reach out to Alex Lawton  
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for any questions or feedback.