



Questions and Answers on Interim Reconfiguration Auction (RA) Qualification Processes

Originally published on April 14, 2025. Updated on April 21, 2025.

General Notes Applicable to this Q&A Document

Pursuant to Tariff revisions that the Federal Energy Regulatory Commission (FERC) accepted as part of the filing that effected the FCA 19 delay, the ISO will conduct interim RA qualification processes to support reconfiguration auction participation for New Capacity Resources that intend to achieve Commercial Operation as defined in Section III.13.1.1.2.2.2.(h) of Tariff before June 1, 2028.

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.

The answers to frequently asked questions included in this document reflect the ISO's expected implementation of a Transitional Capacity Network Resource (TCNRGS) with the 2025 interim RA qualification process, based on ISO's expected compliance with FERC Order No. 2023 and Order No. 2023-A, at the time of its publication. Expected implementation and compliance details 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.

General Interim RA Qualification Process Questions

Q1: What is the purpose of interim RA qualification processes?

Answer: Interim RA qualification processes allow 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 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 an interim RA qualification process result in my project qualifying for FCA 19?

Answer: No, interim RA qualification processes are for RA access only. Projects that successfully complete an 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 an 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 interim RA qualification processes be very different from the submissions required for recent FCA qualification processes?

Answer: No, the submissions required for interim RA qualification processes 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 interim RA qualification process](#) SOI Forms and NCQPs is similar to the information required for the same submissions for recent FCA qualification processes.

Q4: Will the Forward Capacity Tracking System (FCTS) look different when submitting materials for interim RA qualification processes?

Answer: Participants will use the 2028-2029 Capacity Commitment Period to submit materials for all interim RA qualification processes, but the basic layout of user interfaces will look the same. Each interim RA qualification process will be assigned a round number (round 1 is for 2024, round 2 is for 2025, and round 3 is for 2026) which will be added to submission user interfaces in FCTS. A round number filter will be available to locate submissions from different rounds of interim RA qualification.

Q5: Where can I find the schedule for the interim RA qualification process activities?

Answer: Click [here](#) to access the FCM Auction Calendars section of the Forward Capacity Market webpage. Scroll to the bottom to access a list of auction calendars, including those for upcoming interim RA qualification processes.

Q6: Do I have to use FCTS to submit an SOI Form for interim RA qualification processes?

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

Q7: Can I carry over an SOI Form submitted during a new capacity qualification process for an FCA or a prior round of interim RA qualification?

Answer: No, the carry over functionality in FCTS does not support submissions for interim RA qualification processes. 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.

Q8: Is a Qualification Process Cost Reimbursement Deposit (QPCRD) required for projects participating in interim RA qualification processes?

Answer: Yes, a QPCRD is required for projects participating in interim RA qualification processes. 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 interim RA qualification processes if it does not receive the required payment by the invoice due date.

Q9: 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 interim RA qualification processes 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.

Q10: How will the ISO perform the capacity deliverability analysis for interim RA qualification processes?

Answer: For interim RA qualification processes, 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).

Q11: How will the ISO notify me if my project has successfully completed an interim RA qualification process?

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

Q12: 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 an 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 interim RA qualification processes).

Q13: Can I withdraw my project from an 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.

Q14: Can I submit an interim RA qualification process SOI Form for the uncleared portion of a resource that already has some CSO?

Answer: No, interim RA qualification processes are 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 interim RA qualification processes): *"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."*

Q15: Can Distributed Energy Capacity Resources (DECRs) participate in interim RA qualification processes?

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

Order No. 2023 Impacts on the 2025 interim RA qualification process.

On May 14, 2024, the ISO, the New England Power Pool (NEPOOL) Participants Committee, and the Participating Transmission Owners Administrative Committee (PTO AC) on behalf of the New England Participating Transmission Owners (together, Filing Parties), submitted revisions to ISO New England's Transmission, Markets and Services Tariff in compliance with, and related to, Order Nos. 2023 and 2023-A (together, the [Compliance Proposal](#)). On April 4, 2025, FERC issued an [order](#) accepting the Compliance Proposal in part, and directed the Filing Parties to submit a further compliance filing within 60 days of the order.

The April 4, 2025 order accepted the main components of the Compliance Proposal, including the major deviations from the FERC pro forma rules proposed under the independent entity variation. Notably, the order did not modify the June 13, 2024 eligibility date set by Order No. 2023 and affirmed in Order No. 2023-A, and accepted all dates proposed in the Compliance Proposal, including the August 12, 2024 effective date.

In response to the order, one step that the ISO is planning to take is to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year. This step will allow a TCNRGS to take place with the 2025 interim RA qualification process. The proposed Tariff revisions to adjust the dates needs to be filed promptly with FERC to have clear rules to run the TCNRGS with the 2025 interim RA qualification process

(which begins in April 2025). The ISO plans to file the narrowly tailored date changes under Section 205 of the Federal Power Act immediately following the May 2025 NEPOOL Participants Committee meeting and request a next-day effective date for the revisions to adjust the dates.

Questions and responses on impacts to the 2025 Interim RA Qualification Process from ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year to allow a TCNRGS to take place with the 2025 interim RA qualification process are provided below.

Q16: Which Tariff rules will be in effect for the 2025 interim RA qualification process?

Answer: The Tariff currently in effect is the Tariff approved through the April 4, 2025 order. In particular for the 2025 interim RA qualification process:

- III.13.A.2(b) 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, 2028 may use the 2025 interim RA qualification process.
- Section III.13.1.1.2.3 describes the interconnection review for interim RA qualification processes. Without adjustment of the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year, projects subject to the ISO Interconnection Procedures use the results of a cluster study for the interconnection review, while projects not subject to the ISO interconnection procedures make use of a deliverability screen. ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year will allow performance of a TCNRGS with the 2025 interim RA qualification process, which would use the overlapping interconnection impacts analysis rules associated with previous FCA qualification processes when performing a deliverability review.
- Sections 3.2.1.3 and 5.1.1.3 of Schedules 22/23/25, and Section II.48(a) of the Open Access Transmission Tariff require projects subject to the ISO Interconnection Procedures to have a completed System Impact Study (SIS) before July 1, 2024 in order to participate in the 2025 interim RA qualification process. The ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year will change this SIS completion deadline for this purpose to April 4, 2025.

The ISO plans to file the narrowly tailored date changes under Section 205 of the Federal Power Act immediately following the May 2025 NEPOOL Participants Committee meeting and request a next-day effective date for the revisions to adjust the dates. This means that Tariff changes to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year will not be effective by the April 30, 2025 SOI submission deadline associated with the 2025 interim RA qualification process. The ISO will accept SOI Forms for the 2025 interim RA qualification process for projects seeking to participate in the TCNRGS that are submitted before the April 30,

2025 SOI Form submission deadline. The ISO will apply the rules in effect at the time it makes qualification determinations for the 2025 interim RA qualification process.

Q17: What other significant impacts would the ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year have on the 2025 interim RA qualification process?

Answer: The currently effective Tariff results in an interconnection process where projects subject to the ISO Interconnection Procedures establish CNRC by completing the interconnection process. In other words, after September 4, 2024 (i.e., the CNRC establishment transition date), projects would no longer be able to establish CNRC by clearing a CSO in a Forward Capacity Market (FCM) activity (i.e., an FCA, an RA or a bilateral transaction).

ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year will allow performance of a TCNRGS with the 2025 interim RA qualification process, which enables 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 2025 interim RA qualification/TCNRGS process. Projects not subject to the ISO Interconnection Procedures can also establish equivalent CNRC by successfully completing the 2025 interim RA qualification/TCNRGS process.

Note that the ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year would shift the CNRC establishment transition date from September 4, 2024 to September 4, 2025.

Q18: Based on the currently effective Tariff and the ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year, would my project be able to participate in both the 2025 interim RA qualification process that supports the TCNRGS and the Transitional Cluster Study (TCS)?

Answer: Yes, on this basis, a project would be able submit an SOI Form and NCQP to participate in the 2025 interim RA qualification process that supports the TCNRGS, and a TCS Agreement to participate in the TCS, 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 2025 interim RA qualification process/TCNRGS and then withdraw from the Transitional Cluster Study without penalty. As another example, a project would be able to withdraw (or be withdrawn from) the 2025 interim RA qualification process/TCNRGS and continue participation in the TCS.

Q19: Based on the currently effective Tariff and the ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year, do projects not subject to the ISO-NE Interconnection Procedures need to have a completed SIS by April 4, 2025 in order to participate in the 2025 interim RA qualification process that supports the TCNRGS?

Answer: No, on this basis, projects not subject to the ISO Interconnection Procedures do not need to have a completed SIS by April 4, 2025 to complete the 2025 interim RA qualification process that supports the TCNRGS. Note that the ISO will review any completed SIS for all projects participating in the interim RA qualification process to ensure any upgrades identified in the SIS can be constructed before June 1, 2028.

Q20: Based on the currently effective Tariff and the ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year, do projects not subject to the ISO-NE Interconnection Procedures need to have a valid Interconnection Request (IR) on or before June 13, 2024 (i.e. the eligibility date set by Order No. 2023) in order to participate in the 2025 interim RA qualification process that supports the TCNRGS?

Answer: No, on this basis, projects not subject to the ISO Interconnection Procedures can participate in the 2025 interim RA qualification process that supports the TCNRGS with a valid IR after June 13, 2024, as long as the IR was valid on or before the April 30, 2025 SOI Form submission deadline.

Q21: Based on the currently effective Tariff and the ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year, can a project successfully complete the 2025 interim RA qualification process if the ISO identifies a violation that requires a system upgrade during analysis performed for the TCNRGS?

Answer: No, on this basis, projects that require an upgrade to address a violation identified by the ISO during the analysis performed for the TCNRGS would not be able complete the 2025 interim RA qualification process/TCNRGS since any such upgrades would be identified too late for inclusion in the TCS. Similar to past FCA qualification processes, 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.

Q22: Based on the currently effective Tariff and the ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year, does my project require a Commercial Readiness Deposit?

Answer: On this basis, Generating Capacity Resources and Import Capacity Resources associated with a project subject to the ISO's Interconnection Procedures must meet the Commercial Readiness Deposit requirements. A Commercial Readiness Deposit is not required for projects not subject to the ISO Interconnection Procedures.

Q23: Based on the currently effective Tariff and the ISO's proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year, what would happen to the Commercial Readiness Deposit if I withdraw my project from CPS monitoring

after the ‘Collect Commercial Readiness Deposit’ deadline and my project does not achieve Commercial Operation?

Answer: On this basis, projects withdrawn from CPS monitoring and that fail to achieve Commercial Operation 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 their established CNRC.

Further on this basis, where a project subject to the ISO Interconnection Procedures successfully participates in the TCNRGS and completes the 2025 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.

Q24: Based on the currently effective Tariff and the ISO’s proposal to adjust the dates necessary to shift the transition activities in the Compliance Proposal by approximately one year, do projects that have not obtained a CSO through an FCM auction before September 4, 2025 to establish CNRC need to participate in the 2025 interim RA qualification process 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 a previous FCA and elected CPS monitoring, or that completed the 2024 interim RA qualification process, but did not obtain a CSO in a previous FCA, or any RAs or CSO bilateral periods to establish CNRC before September 4, 2025, would not be eligible for RA participation after September 4, 2025, unless the resource successfully completes the 2025 interim RA qualification process (or a future 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.

Note that projects that successfully complete the 2025 interim RA qualification process/TCNRGS cannot simultaneously be on CPS monitoring as a result of completing a previous qualification process (i.e. the same capacity cannot be qualified in two separate but simultaneous instances). Projects actively on CPS monitoring prior to participation in the 2025 interim RA qualification process/TCNRGS must withdraw from CPS monitoring prior to the September 12, 2025 ‘SOI Capacity Reduction Deadline for Generation’ as a condition to successfully complete the 2025 interim RA qualification process/TCNRGS.

Also note that Projects that have already obtained a CSO cannot participate in an interim RA qualification process (see responses to Q1 and Q14).