

Order Nos. 2023/2023-A Conforming Changes to ISO Planning Procedures



Affected System Operator (ASO) Study Coordination

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Order Nos. 2023/2023-A - Conforming Changes to ISO Planning Procedures (ASO Study Coordination)

Proposed Effective Date: September 2024 (for PP5-6)

- The ISO identified the need for several conforming changes to Planning Procedure 5-6: Interconnection Planning Procedure for Generation and Elective Transmission Upgrades (PP5-6) and Planning Procedure 10: Planning Procedure to Support the Forward Capacity Market (PP10)*, as a result of Order Nos. 2023/2023-A
 - Order Nos. 2023/2023-A result in significant reforms to the interconnection process to move to a “first ready, first served” Cluster Study construct with clustered Interconnection Requests equally queued
- This is the fifth RC meeting where the ISO will discuss the proposed PP5-6 modifications to describe **ASO Study Coordination**
 - This presentation introduces additional PP5-6 redline modifications to address stakeholder feedback

*Conforming changes to PP10 will be introduced in Q4 2024



AFFECTED SYSTEM OPERATOR STUDY COORDINATION

*Alignment with the new Order No. 2023 interconnection
process*



State Jurisdictional Submittals

- Pursuant to Section I.3.9 of the ISO New England Transmission, Markets, and Services Tariff, Market Participants (MP) are required to submit notice to the ISO for additions or changes to any generating resource at least 60 days prior to the project's planned in-service date
 - In many cases, the Transmission Owner (TO) submits these applications on behalf of a developer because they are not yet, or will not be a Market Participant
- Review of these applications is implemented through ISO-NE [Planning Procedure 5-1 \(PP5-1\)](#)
 - In accordance with PP5-1, any new or increased generation with a nameplate capability greater than 1 MW must either submit a Generator Notification Form (GNF) or a Proposed Plan Application (PPA)



State Jurisdictional Submittals (cont'd)

- The ISO reviews these GNFs and PPAs and provides a response on the level of analysis required pursuant to [Planning Procedure 5-3 \(PP5-3\)](#)
 - Level 0 indicates concurrence of a project's Generator Notification Form proceeding to the Reliability Committee Consent Agenda
 - No study is required for these projects under Planning Procedure 5-1
 - Level III requires that the project undergo a transmission System Impact Study (SIS), consistent with Planning Procedure 5-6, to support the PPA, prior to it proceeding to the Reliability Committee for an advisory vote



ASO Study Coordination – Roles & Responsibilities

- The ISO serves as an affected party to Distributed Energy Resource (DER) ASO studies, and helps to coordinate project approvals through Section I.3.9 of the Tariff
- The Interconnecting TO is responsible for conducting the Transmission System Impact Study on the developer's behalf for state jurisdictional projects
- The ISO's role in these studies is to provide hands-on guidance on study practices and modeling methods to ensure the study is in compliance with the applicable Tariff and Planning Procedure requirements in support of I.3.9 approval



Coordination of ASO Studies with FERC Jurisdictional Studies – Post-Order No. 2023

- FERC Order No. 2023 mandates that cluster studies must be used to study FERC jurisdictional interconnection requests
 - The Order No. 2023 cluster study process requires fixed, targeted timeframes for the initiation and completion of cluster studies
 - These fixed timeframes necessitate coordination of ASO study initiation and completion
- In order to better coordinate between ASO studies and FERC Order No. 2023 Clusters, ISO-NE is seeking to update the process by which ISO-NE reviews and approves state jurisdictional projects through the I.3.9 process
 - ISO-NE is seeking to create windows for these I.3.9 reviews to ensure efficient alignment of the processes



Coordination of ASO Studies with FERC Jurisdictional Studies

- There will be a delineation between projects that are relevant* to FERC jurisdictional studies, and those that are not
 - ASO studies taking place in an electrical part of the system that are not relevant will be able to complete their studies without respecting an ongoing FERC study
 - ASO studies taking place in an electrical part of the system that are relevant will need to respect and coordinate with an ongoing FERC study
- These ASO studies will need to model all relevant FERC jurisdictional projects and associated upgrades in the ASO base cases
 - Depending on the in-service date of the projects, the ASO study may need to run both pre- and post-FERC project cases

*The determination of relevance is based upon a review of electrical proximity, the likelihood of causing common violations, and whether identified upgrades of FERC Interconnection Requests may impact the performance of the proposed projects



Why ISO is Proposing to Change the Timing of Determination Requests

- As described earlier, ASO studies will have to coordinate with and respect ISO Cluster Studies
 - This will naturally establish windows for the start and completion of ASO studies
- Note that coordination has always been required between ISO Interconnection Studies and ASO studies
 - Under the first-come-first-served approach (pre-Order No. 2023), ASO studies have always been required to respect any ISO Interconnection Study that had started
 - This has always had the potential to cause ongoing ASO studies to require additional time to complete while the new ISO study was incorporated
 - Post-Order No. 2023, the potential to be affected by a newly starting ISO study is eliminated by the clustering windows for ISO Interconnection Requests
- **The Trade-off:**
 - The **set of ISO requests for an ASO study to coordinate with is fixed** upon the close of the ISO Cluster Request Window
 - However, **the ASO process must coordinate with these windows**



Why ISO is Proposing to Change the Timing of Determination Requests – Example

- If the ISO continued to process determinations for DER projects on a rolling monthly basis, the following could occur in the months after the ASO coordinated studies are initiated
- Example Substation with no existing DERs in electrical proximity

Months After Closing of Cluster Windows	DER Project Proposed at the Example Substation (MW)	ISO Determination Under the Current Rolling Monthly Process
Month +1	4.9	Level 0
Month +2	4.9	Level 0
Month +3	4.9	Level 0
Month +4	4.9	Level 0
Month +5	4.9	Level III*

*A Level III study of the 4.9 MW proposal in Month +5



Why ISO is Proposing to Change the Timing of Determination Requests – Example (cont'd)

- If the ISO continued to process determinations for DER projects on a rolling monthly basis, the example on the previous slide would result in a Level III study of the individual 4.9 MW project submitted in Month +5
 - By itself, this Level III study will be time consuming, but may not show any adverse impacts because the 4.9 MW size is small relative to the adverse impact thresholds
- If all of the proposals had been submitted in the period prior to the closing of the clustering windows, then a Level III study would have been identified for the aggregated 24.5 MW at the example substation
 - A Level III study of the aggregated 24.5 MW may have identified adverse impacts



Stakeholder Feedback

- The ISO's determination process proposal was introduced at the June 18, 2024 RC and redlines were initially presented at the July 16, 2024 RC
- The ISO held several meetings with affected entities to gather feedback
- The ISO received further stakeholder input at the July 25, 2024 RC
- The ISO considered various approaches to address the concerns of affected parties, while considering reliability requirements and achieving the goal of improved coordination with the new Order No. 2023 construct
- With stakeholder input, the ISO developed modifications to the previously presented redlines that address concerns while maintaining the clustering construct stakeholder



Summary of Modifications to Redlines

- The ISO will make Level 0 and Level III determinations outside of the project submission windows
- For the purposes of the determination, the project(s) submitted outside of the submission windows will be aggregated with those submitted within the windows
- After the determination is made, the following applies:
 - If the project(s) is determined to be Level 0, the project(s) can submit a notification form immediately
 - If a project(s) is determined to be Level III, and the project(s) in aggregate are less than 20 MW, the project(s) will be moved to the next project submission window for review
 - If the project(s) is determined to be Level III, and the project(s) in aggregate are greater than or equal to 20 MW, a new ASO study can begin
 - Projects relevant to the ongoing ISO Cluster Study will need to coordinate with the ongoing ISO Cluster Study

AFFECTED SYSTEM OPERATOR STUDY COORDINATION

PP5-6 Redlines



Coordination of ASO Studies with ISO Interconnection Studies – Post-Order No. 2023

PP5-6 Section	Procedure Change	Reason for Change
11.4: <i>Coordination of ASO Studies with ISO Interconnection Studies – Post-Order No. 2023</i>	<p><u>FERC Order No. 2023 establishes a Cluster Study process that requires fixed targeted timeframes for the initiation and completion of ISO Interconnection Requests. These fixed timeframes necessitate alignment of ASO study initiation and completion.</u></p> <p><u>ISO shall will continue to perform Level 0 and Level III determinations, in accordance with Appendix I of this Planning Procedure, through starting on the beginning date of the Transitional Cluster Study, 2024. Thereafter, the next opportunity to submit requests for Level 0 and Level III determinations will be during the next state project submission window projects will be reviewed to determine the level of analysis on an aggregate basis with specified windows as described in section 11.5.</u></p>	Coordination with ISO Interconnection Studies – Following effective date of Order No. 2023

Coordination of ASO Studies with ISO Interconnection Studies – Post-Order No. 2023

PP5-6 Section	Procedure Change	Reason for Change
<p>11.4: <i>Coordination of ASO Studies with ISO Interconnection Studies – Post-Order No. 2023</i></p>	<p><u>Projects submitted outside of these windows will be reviewed in accordance with Appendix I of this Planning Procedure in addition to the following considerations:</u></p> <ul style="list-style-type: none"> <u>If the project(s) is determined to be level 0, the project(s) can submit a notification form immediately.</u> <u>If the project(s) is determined to be level III, and the project(s) in aggregate are less than 20MWs, the project(s) will be moved to the next project submission window for review.</u> <u>If the project(s) is determined to be level III, and the project(s) in aggregate are greater than or equal to 20MWs, a new ASO study can be started in accordance with this section 11.</u> <p><u>ASO studies that are relevant to the ISO Cluster Study will continue to coordinate with the study as described in section 11.3.</u></p> <p><u>ASO studies taking place in a part of the system that are not relevant to the ISO Cluster Study will be able to complete their studies without respecting the ISO Cluster Study.</u></p>	<p>Coordination with ISO Interconnection Studies – Following effective date of Order No. 2023 - continued</p>



Coordination of ASO Studies with ISO Interconnection Studies – Post-Order No. 2023

PP5-6 Section	Procedure Change	Reason for Change
Appendix I	<p><u>ISO will shall respond to requests for determinations outside of the project submission window within 10 business days of receiving the request with the determination of whether the project will need to submit a Generator Notification Form, or Proposed Plans Application. The ISO will also respond with the determination of what level of analysis is required to support the application. Determinations will be valid until the start of the next ISO Cluster Request Window. In these cases, where insufficient analysis is provided to support the proposal, the applications may need to be withdrawn and re-submitted at a later time with sufficient analysis.</u></p>	Conforming change



Timelines for Transition

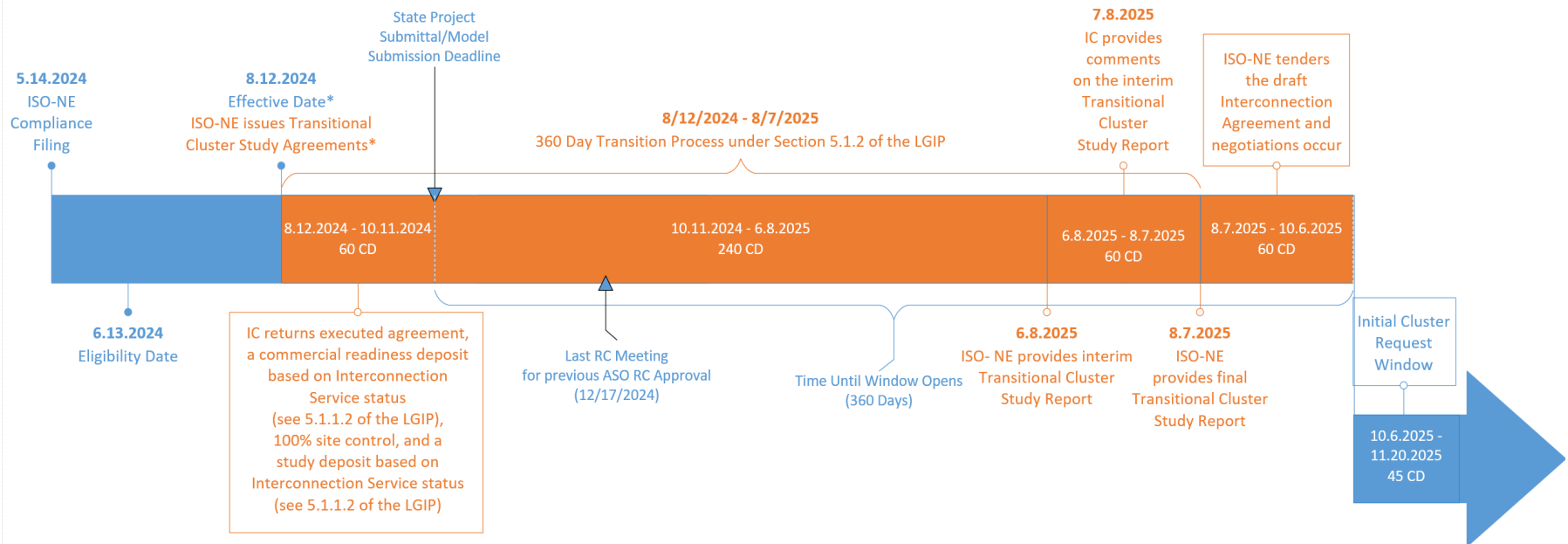
Transition Order 2023 Timeline Transitional Cluster Study

Key

LGIP = Large Generator Interconnection Procedures

IC = Interconnection Customer

CD = Calendar Days



*Late stage System Impact Studies have until 8/30/2024 to have comments addressed and to be finalized. Interconnection Customers for which the System Operator projects to complete the system impact studies between 6/13/2024 and 8/30/2024, shall be tendered a Transitional Cluster Study Agreement no later than the Commission-approved effective date of this LGIP. However, if the Interconnection Customer accepts the results of its system impact study on or before 8/30/2024, the System Operator shall not include the Interconnection Request in the Transitional Cluster Study, and instead will tender a Large Generator Interconnection Agreement pursuant to Section 11 of this LGIP, and refund any deposits associated with participation in the Transitional Cluster Study.

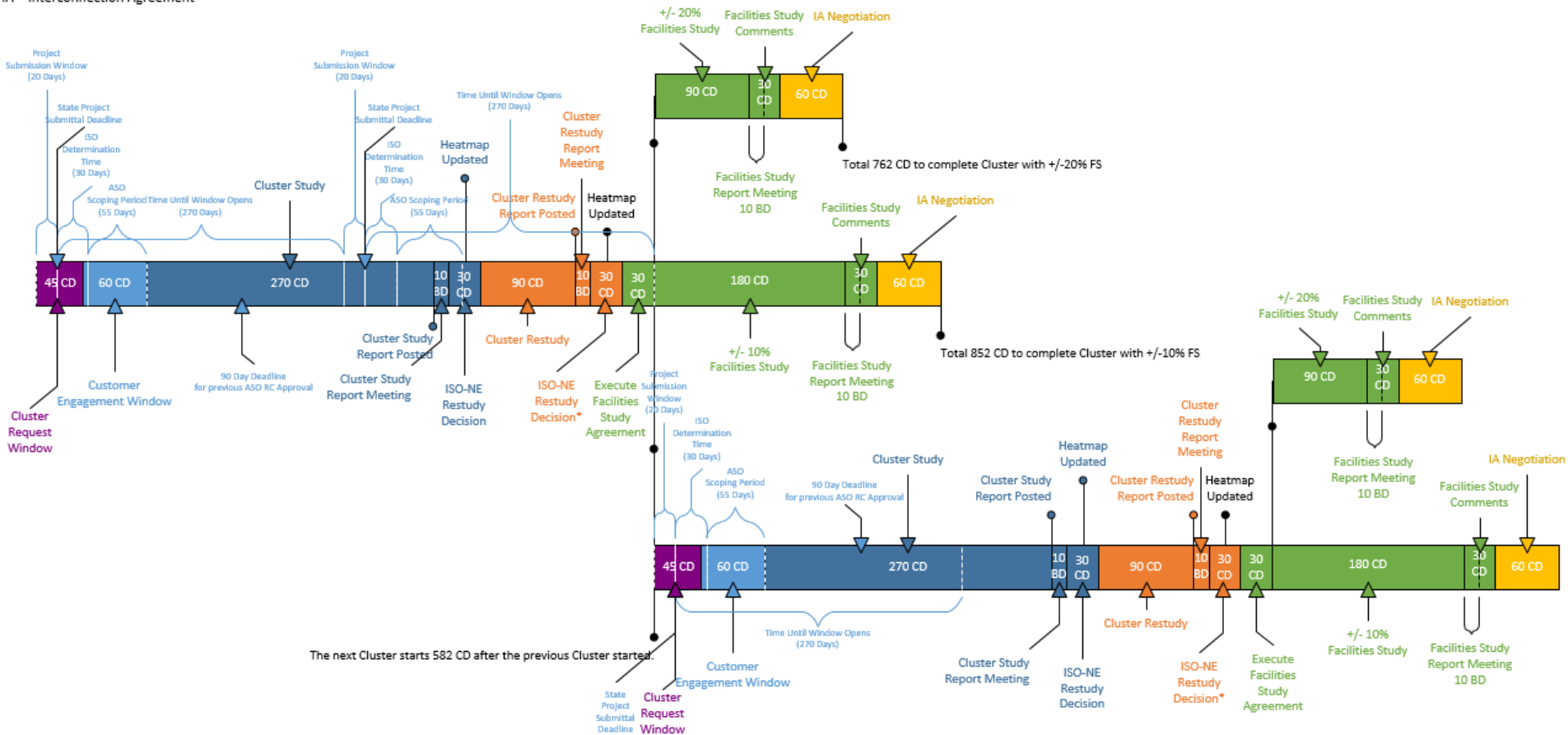
*This will be the requested Effective Date in ISO-NE's compliance filing, but it will actually be determined by the FERC approval.

Timelines Post-Transition

Key

CD = Calendar Days
BD = Business Days
FS = Facilities Study
IA = Interconnection Agreement

ISO-NE Order 2023 Timeline



*If additional restudies are necessary, go back to Cluster Restudy.

Conclusion & Next Steps

- Modifications to PP5-6 are needed to document ASO coordination practice as they relate to state jurisdictional projects
- Further modifications to PP5-6 are needed to support coordination of state jurisdictional project reviews and studies with FERC Order No. 2023
- The ISO will request a September 2024 effective date



Stakeholder Schedule

Stakeholder Committee and Date	Scheduled Project Milestone
Reliability Committee March 19, 2024	Initial Presentation
Reliability Committee June 18th, 2024	Updated Presentation
Reliability Committee July 16, 2024	Review PP5-6 Redlines
Reliability Committee July 25, 2024	Additional meeting to continue discussion on PP5-6 redlines from the July 16, 2024 RC and introduce any related amendments.
Reliability Committee August 13-14, 2024	Review PP5-6 Redlines; Vote
Participants Committee September 5, 2024	Vote

Questions

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