

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc. and	)	Docket Nos. ER22-2357-000
PTO Administrative Committee	)	ER25-410-000
	)	

**MOTION FOR DEFERRAL OF EFFECTIVE DATES OF  
ISO NEW ENGLAND INC. AND THE PARTICIPATING TRANSMISSION OWNERS  
ADMINISTRATIVE COMMITTEE**

Pursuant to Rules 212 and 2008 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),<sup>1</sup> ISO New England Inc. (“ISO-NE”)<sup>2</sup> and the PTO Administrative Committee (“PTO AC”) on behalf of the Participating Transmission Owners (“PTO”)<sup>3</sup> (together the “Filing Parties”) respectfully submit this Motion for Deferral of the Effective Date (“Motion for Deferral”) for the Tariff revisions accepted by the Commission in

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<sup>1</sup> 18 C.F.R. §§ 385.212 and 385.2008 (2020).

<sup>2</sup> Capitalized terms used but not defined in this Motion are intended to have the meanings given to such terms in the Second Restated New England Power Pool Agreement, the Participants Agreement, and the ISO New England Inc. Transmission, Markets and Services Tariff (“Tariff”). Section II of the Tariff contains the ISO-NE Open Access Transmission Tariff (“OATT”).

<sup>3</sup> The PTOs include: Town of Braintree Electric Light Department; Central Maine Power Company; Chicopee Electric Light Department; Connecticut Municipal Electric Energy Cooperative; Connecticut Transmission Municipal Electric Energy Cooperative; Eversource Energy Service Company on behalf of The Connecticut Light and Power Company, Public Service Company of New Hampshire and NSTAR Electric Company; Fitchburg Gas and Electric Light Company; Green Mountain Power Corporation; Town of Hudson Light and Power Department; Maine Electric Power Company; The City of Holyoke Gas and Electric Department; Massachusetts Municipal Wholesale Electric Company; Town of Middleborough Gas & Electric Department; The Narragansett Electric Company d/b/a Rhode Island Energy; New England Power Company d/b/a National Grid; New Hampshire Electric Cooperative, Inc.; New Hampshire Transmission, LLC; Town of Norwood Municipal Light Department; Town of Reading Municipal Light Department; Shrewsbury Electric and Cable Operations; Stowe Electric Department; Taunton Municipal Lighting Plant; The United Illuminating Company; Unitil Energy Systems, Inc.; Vermont Electric Cooperative, Inc.; Vermont Electric Power Company, Inc.; Vermont Public Power Supply Authority; Vermont Transco, LLC; Versant Power; and Town of Wallingford, Connecticut Department of Public Utilities Electric Division.

compliance with the requirements of Order Nos. 881 881-A<sup>4</sup> (collectively, “Order No. 881”) in FERC Docket No. ER22-2357,<sup>5</sup> as well as the conforming Tariff revisions accepted by the Commission in FERC Docket No. ER25-410.<sup>6</sup> For the reasons set forth in this Motion for Deferral and the supporting Affidavit of David Hameedy, ISO-NE’s Executive Director, Program Management Office,<sup>7</sup> which is solely sponsored by ISO-NE, the Filing Parties request to extend the Tariff revisions’ current effective date of July 12, 2025 up to, and including, December 15, 2026.

Pursuant to Rule 2008, the Commission may extend “the time by which any person is required or allowed to act under any statute, rule, or order . . . for good cause, upon a motion made before the expiration of the period prescribed or previously extended.” The Filing Parties submit that good cause exists for the Commission to grant this Motion for Deferral. The extension is necessary to allow ISO-NE and PTOs to shift their respective implementation schedules by approximately seventeen months in order to accommodate delays in ISO-NE’s vendor’s delivery schedule and the development of ISO-NE’s software, known as the Limited Exchange Portal (“LEP”), that is required for the PTOs and other market participants to transmit transmission line

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<sup>4</sup> *Managing Transmission Line Ratings*, Order No. 881, 87 Fed. Reg. 2244 (January 13, 2022), 177 FERC ¶ 61,179 (2021) (“Order No. 881”), *Order Addressing Arguments Raised on Rehearing and Clarification*, Order No. 881-A, 179 FERC ¶ 61,125 (2022) (“Order No. 881 -A”).

<sup>5</sup> *See ISO New England Inc., et al.*, Amendments to the ISO New England Inc. Transmission, Markets and Services Tariff in Compliance with Order No. 881 (July 12, 2022) (“Order No. 881 Compliance Filing”), acpt’d, subject to further compliance by Order on Compliance Filing, 183 FERC ¶ 61,180 (2023) (“Compliance Order”); Revisions to the ISO New England Inc. Transmission, Markets and Services Tariff in Further Compliance with Order No. 881, Docket No. ER22-2357 (Aug 14, 2023) (“Further Compliance Revisions”), acpt’d by Letter Order, Docket No. ER22-2357-001 (Dec. 4, 2023) (“Further Compliance Order”).

<sup>6</sup> *ISO New England Inc.*, Revisions to ISO New England Inc. Open Access Transmission Tariff to Revise Attachment C – Available Transfer Capability Methodology to Conform with Attachment Q – Transmission Line Ratings (November 12, 2024) (“Attachment C Revisions”), acpt’d by Letter Order, Docket No. ER25-410 (Feb. 26, 2025)

<sup>7</sup> The Affidavit of David Hameedy is submitted as Attachment A to this Motion for Deferral.

ratings, such as ambient-adjusted line ratings (“AARs”), to ISO-NE, and for ISO-NE to extract the ratings for use in the Day-Ahead Market and Real-Time Market. The extension of the effective date accounts not only for the time to accommodate delays in ISO-NE’s vendor’s delivery schedule and ISO-NE’s development of the LEP, but would further provide the time necessary for the PTOs and other market participants subject to the requirements set forth in the Tariff rules implementing Order No. 881 to familiarize themselves with software and to complete development of their own systems for calculating and transmitting Order No. 881 compliant transmission line ratings to ISO-NE.

The Filing Parties respectfully request that the Commission issue an order no later than June 2, 2025, granting the Filing Parties Motion for Deferral of the Tariff rules’ effective date from July 12, 2025 to December 15, 2026. Considering the vendor delay in delivery of the software that is needed for ISO-NE and the PTOs to implement Order No. 881, and the time to test and train after delivery of the software, it is highly unlikely that the Filing Parties will be able to implement the Tariff rules as of July 12, 2025. An order by June 2, 2025 provides the Filing Parties the certainty needed regarding their Tariff obligations.

## **I. BACKGROUND**

### **A. Order Nos. 881 and 881-A**

On December 16, 2021, the Commission issued Order No. 881, a final rule revising the Commission’s *pro forma* Open Access Transmission Tariff and regulations to improve the accuracy and transparency of transmission line ratings. The Final Rule required: 1) public utility

transmission providers<sup>8</sup> to implement AARs on the transmission lines over which they provide transmission service; 2) regional transmission organizations (“RTOs”) and independent system operators (“ISOs”) to establish and implement the systems and procedures necessary to allow transmission owners to electronically update transmission line ratings at least hourly; 3) public utility transmission providers to use uniquely determined emergency ratings; 4) public utility transmission owners to share transmission line ratings and transmission line rating methodologies with their respective transmission provider(s) and with market monitors in RTO and ISO regions; and 5) public utility transmission providers to maintain a database of transmission owners’ transmission line ratings and transmission line rating methodologies on the transmission provider’s Open Access Same-Time Information System (“OASIS”) site or other password-protected website. On May 19, 2022, the Commission issued Order No. 881-A, acting on requests for rehearing and clarification of Order No. 881, modifying the discussion in Order No. 881, granting clarification in part, and continuing to reach the same conclusion as the Final Rule.

#### **B. ISO-NE and PTOs’ Compliance Filings**

On July 12, 2022, in Docket No. ER22-2357, ISO-NE, joined by NEPOOL and the PTO-AC on behalf of the PTOs, submitted proposed revisions to the ISO-NE Tariff to comply with Order Nos. 881 and 881-A. These Tariff revisions included new Attachment Q to the ISO-NE OATT, which contains ISO-NE’s rules for transmission line ratings, new Attachment M to Schedule 21-Common of the ISO-NE OATT, which contains the PTOs’ rules for transmission line

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<sup>8</sup> See Order No. 881 at fn. 2 (stating that “in this final rule we use transmission provider to mean any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce. 18 CFR 37.3 (2021). Therefore, unless otherwise noted, ‘transmission provider’ refers only to public utility transmission providers. Furthermore, the term ‘public utility’ as found in Section 201(e) of the FPA means ‘any person who owns or operates facilities subject to the jurisdiction of the Commission under this subchapter...’ 16 U.S.C. 824(e).”).

ratings, and discreet changes to Schedule 18 to the ISO-NE OATT to except Cross Sound Cable (“CSC”) from the requirements of Attachment Q.<sup>9</sup>

On June 15, 2023, the Commission issued the Compliance Order, accepting, subject to further compliance, the Order No. 881 Compliance Filing. Specifically, the Compliance Order directed ISO-NE to modify Attachment Q to include *pro forma* language regarding relevant exceptions from AARs,<sup>10</sup> and specify that ISO-NE will use AARs as the basis to evaluate near-term transmission service requests at its seams with the New York Independent System Operator, Inc. (“NYISO”).<sup>11</sup> The Compliance Order further required ISO-NE and PTOs to specify in both Attachment Q and Attachment M to Schedule 21-Common that ISO-NE will be the party responsible for maintaining the database that contains all transmission line ratings, ratings methodologies, and exceptions or alternate ratings used in New England.<sup>12</sup> Finally, the Compliance Order required ISO-NE and CSC to remove a proposed exception from Schedule 18 to the ISO-NE OATT, which excepted CSC from the transmission line rating procedures contained in Attachment Q.<sup>13</sup> The Compliance Order further found that “because technical considerations for software and other needed implementation steps remain not fully known, ISO-NE may be unable to determine its timelines until closer to AAR implementation and therefore additional time may be necessary to comply with this requirement.”<sup>14</sup> As a result, the Commission directed ISO-

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<sup>9</sup> See generally Order No. 881 Compliance Filing.

<sup>10</sup> Compliance Order at P 30.

<sup>11</sup> Compliance Order at P 18.

<sup>12</sup> Compliance Order at P 39-40.

<sup>13</sup> Compliance Order at P 34.

<sup>14</sup> Compliance Order at P 24.

NE to file, “a further compliance filing that provides its timelines for calculating or submitting AARs.”<sup>15</sup>

On August 14, 2023, the Filing Parties submitted the Further Compliance Revisions to address the directives in the Compliance Order.<sup>16</sup> The Further Compliance Revisions were accepted by the Commission on December 4, 2023.<sup>17</sup>

On November 12, 2024, ISO-NE and the PTO-AC submitted a further compliance filing, consistent with Paragraph 24 of the Compliance Order, describing the expected timelines for calculating and submitting AARs for use by the ISO.<sup>18</sup> This filing reflected a July 12, 2025 effective date, however, the delays described herein have since necessitated the Motion for Deferral to extend that date and accommodate a new implementation schedule.

## **II. MOTION FOR DEFERRAL OF EFFECTIVE DATE**

ISO-NE and the PTOs have been working to prepare for the Order No. 881 compliance requirements set forth in the ISO-NE Tariff, including Attachment Q of the ISO-NE OATT, Attachment M of Schedule 21-Common to the ISO-NE OATT, and the associated conforming changes in Attachment C of the ISO-NE OATT. To date, ISO-NE has been preparing to deploy

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<sup>15</sup> *Id.*

<sup>16</sup> *See* Further Compliance Revisions. In the Further Compliance Revisions, ISO-NE stated that it had begun to determine how it would coordinate the use of AARs at its seam with NYISO and that if ISO-NE identified that changes were needed to Attachment C of the ISO-NE OATT that “ISO-NE will file them as part of the already-pending November 12, 2024 compliance filing on the timelines for calculations and submission of AARs.” *See* Further Compliance Revisions, Transmittal Letter, at 7. After completing this review, ISO-NE determined that changes to Attachment C were necessary; however, as the changes exceeded the requirements of the Compliance Order in so much as Order No. 881 did not require changes to that part of the ISO-NE OATT, ISO-NE would be filing those changes in a separate filing under Section 205 of the Federal Power Act, and would request an effective date consistent with the Commission accepted July 12, 2025 effective date for Attachment Q. That filing was made on November 12, 2024. *See* Attachment C Revisions, *supra*.

<sup>17</sup> *See generally* Further Compliance Order.

<sup>18</sup> *See ISO New England Inc.*, Further Compliance Filing, Docket No. ER22-2357 (Nov. 12, 2024).

the LEP software by creating and using a testing environment, and, in coordination with the PTOs, has developed revisions to ISO-NE Planning Procedure 7 to require that transmission line ratings be consistent with the ISO-NE Tariff provisions incorporating the Order No. 881 requirements.

Despite these efforts, ISO-NE is experiencing delays that render the Tariff rules' effective date of July 12, 2025, infeasible. As noted above, ISO-NE has experienced delays in the delivery of software necessary to implement the Order No. 881 requirements. Accordingly, the Filing Parties respectfully request to defer the effective date of the Commission-accepted ISO-NE Tariff rules necessary to implement the Order No. 881 requirements from July 12, 2025 to December 15, 2026. Good cause exists for the Commission to grant this request because the need for deferral is due to circumstances outside the Filing Parties' control.<sup>19</sup>

The requested seventeen month deferral will allow for the completion of the development, testing, deployment, and training associated with the LEP software, which is the keystone for ISO-NE and the PTOs' implementation of Order No. 881.<sup>20</sup> The LEP is the means by which the PTOs and other participants will submit transmission line ratings to ISO-NE for its use in Day-Ahead and Real-Time operations and market activities. Due to vendor delays outside of ISO-NE's and the PTOs' control, the LEP will not be available prior to the current July 12, 2025 effective date.

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<sup>19</sup> 18 C.F.R. § 385.2008(a).

<sup>20</sup> The Commission has previously granted extensions for other transmission providers for reasons similar to those describe herein. *See e.g.* New York Independent System Operator, Inc., 186 FERC ¶ 61,237 (2024) (granting an extension to be no later than December 31, 2028, to comply with requirements of Order No. 881); Alabama Power Company, et al., 187 FERC ¶ 61,055 (2024) (granting an extension to December 31, 2026, to comply with requirements of Order No. 881); PJM Interconnection, L.L.C., 190 FERC ¶ 61,204 (2025) (granting an extension to April 15 2026 to comply with the requirements of Order No. 881).

The delay in the availability of the LEP is the result of the following factors. First, the Commission's June 2023 Compliance Order required that ISO-NE host rating sets for its own uses, *i.e.* in Day-Ahead and Real-Time operations and market activities, as well as those of the PTOs for the purpose of providing Local Service under Schedule 21 of the OATT.<sup>21</sup> This increased complexity of the LEP resulted in initial development delays, but did not result in a need to modify the implementation schedule at that time.

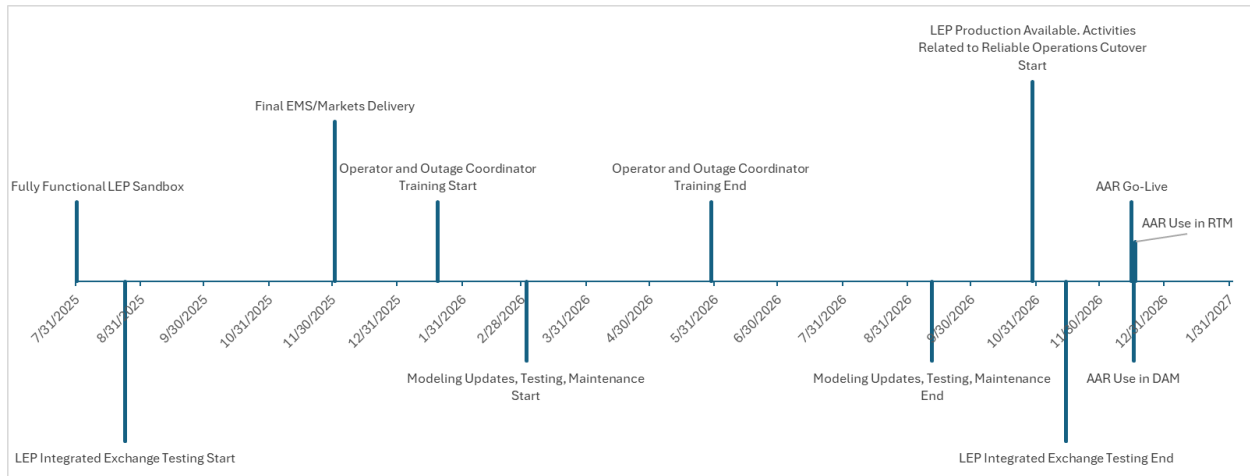
However, this initial delay set the timeline back to the point where, any further delays in the delivery of the software would push the deployment schedule beyond July 12, 2025. When the software vendor provided an initial release of the LEP to ISO-NE in August 2024, the LEP software included bugs and other functionality issues that necessitated updates, the development of which took longer than the vendor originally estimated. These further delays have compounded, resulting in a significantly delayed overall schedule.

As of the date of this Motion for Deferral, ISO-NE's software vendor has delivered, and continues to deliver, elements of the LEP software in separate releases, with each release providing additional required functionality to meet the requirements of Order No. 881. Based on the current release schedule, ISO-NE anticipates that the vendor will provide fully functional LEP software by June 2025. Based on that date, the Filing Parties anticipate the following timeline toward implementation of Order No. 881 requirements:

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<sup>21</sup> June 2023 Order at 39.





1. ISO-NE vendor to deliver functional software by June 2025. This timely delivery will enable the start of ISO-NE's integrated testing in late July 2025. This assumes that the LEP testing environment is fully functional, which is required for the PTOs to begin their testing, training, and procedure development work. The PTOs expect that work could take up to one year from the time that ISO-NE provides a fully functional version of the LEP for their use.
2. ISO-NE to complete all initial integrated software testing by January 2026, allowing time for additional deliveries should they be needed to address any bugs, or other issues found during testing.
3. ISO-NE to conduct operator and engineer training, along with the development of business procedure throughout the first half of 2026.

Once ISO-NE's vendor has completed all deliveries necessary for a fully functional version of LEP, ISO-NE will complete testing of the LEP, and begin training with appropriate personnel to ensure readiness to implement the Order No. 881 requirements as set forth in the ISO-NE Tariff on the requested deferred effective date of December 15, 2026.

As stated above, the PTOs will not be able to complete their testing of the LEP or implement their respective Order No. 881 requirements until ISO-NE has the LEP software in place. As a result, the PTO AC requests that the Commission provide them with same extension

of time to implement the requirements of Order No. 881 contained in both Attachment Q and Schedule 21 to the ISO OATT—that is, December 15, 2026.<sup>22</sup>

As explained in ISO-NE’s November 2024 filing made in compliance with the Compliance Order, and the Attachment C Revisions filing, ISO-NE will ready internal systems to use AARs in the lead up to the effective date. ISO-NE and PTOs will first work to ensure that required transmission line rating sets will be calculated and ready for transmittal prior to the effective date. This process will begin approximately seven weeks prior to the requested December 15, 2026 effective date. This will allow ISO-NE’s outage coordination processing to consider the new seasonal ratings for when the new ratings go into effect on December 15, 2026. The PTOs will begin submitting AARs into the LEP software on the effective date, and ISO-NE will begin to use AARs for Total Transfer Capability calculation and outage coordination as of that date. This process will culminate with the full use of AARs in all required Day-Ahead and Real-Time processes two days following the effective date. This phasing is necessary to ensure that the Day Ahead Market and Real Time Market are using the same ratings sets for individual Operating Days.

While the Filing Parties request that the Commission accept the deferral of the current effective date to December 15, 2026, in the event that implementation can proceed before that

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<sup>22</sup> The PTOs hold the rights to modify Schedule 21-Common of the OATT in the manner specified in Article 3.04 of the Transmission Operating Agreement between ISO-NE and the PTOs (the “TOA”).

date, the Filing Parties commit to providing the Commission notice at least two weeks prior to implementation and request that the Commission accept that earlier effective date.<sup>23</sup>

### **III. REQUEST FOR ACTION**

The Filing Parties respectfully request that the Commission issue an order granting the Motion for Deferral by June 2, 2025. This will provide the Filing Parties the necessary certainty regarding their Tariff obligations ahead of the current effective date.

### **II. CONCLUSION**

For the foregoing reasons, the Filing Parties respectfully request that the Commission grant the Motion for Deferral of the effective date of the Tariff rules to implement Order No. 881 to December 15, 2026, and to issue an order accepting the Motion for Deferral by June 2, 2025.

Respectfully submitted,

/s/ Graham Jesmer

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*Counsel for ISO New England Inc.*

/s/ Mary E. Grover

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Chair, PTO AC Legal Working Group  
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<sup>23</sup> The Filing Parties note that the currently accepted version of Attachment Q to the ISO-NE OATT and Attachment M Schedule 21-Common of the ISO-NE OATT specify July 12, 2025 as an implementation/effective date. Upon the Commission's acceptance of this Motion for Deferral, the Filing Parties will, to the extent necessary, update the Tariff provisions pursuant to a filing under Section 205 of the Federal Power Act. This will ensure the Tariff is consistent with the Commission's action on this Motion for Deferral.

Westwood, MA 02090  
Tel. (781) 441-8696

*Counsel for the Participating Transmission Owners  
Administrative Committee*

Dated: April 3, 2025

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in these proceedings.

Dated at Holyoke, Massachusetts this 3rd day of April, 2025.

/s/ Julie Horgan

Julie Horgan  
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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc.

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Docket Nos. ER22-2357-00\_  
ER25-410-000

**AFFIDAVIT OF M. DAVID HAMEEDY  
ON BEHALF OF  
ISO NEW ENGLAND INC.**

1 My name is M. David Hameedy. I am the Director of the Program Management Office of ISO  
2 New England Inc. (“ISO”). My business address is One Sullivan Road, Holyoke, Massachusetts  
3 01040.

4  
5 My primary responsibilities include managing the portfolio of capital projects at the ISO from  
6 inception to completion. I have served in this role since January of 2005. Prior to that date, I  
7 served as the Project Manager for the Standard Market Design project and then the Development  
8 Manager in the Information Technology Department. I received my BS in Nuclear Engineering  
9 from the University of Arizona in 1981, my MS degree in Nuclear Engineering from the  
10 University of Arizona in 1983, and my MBA from Rensselaer Polytechnic Institute (RPI) in  
11 1988. Before joining the ISO, I worked for the New York Power Authority, Westinghouse  
12 Electric Corporation, and ABB in several engineering and marketing positions.

13  
14 I am providing this affidavit in support of a request to delay the effective date of previously  
15 accepted tariff provisions relating to the use of Ambient Adjust Ratings (“AARs”) consistent  
16 with the Commission’s Order No. 881, and, more specifically, to summarize delay in software  
17 deployment that necessitate the delay.

1 The delay in the availability of the LEP is the result of two chief factors, first was the  
2 Commission's direction to require that the ISO host rating sets for its own uses, *i.e.* in Day-  
3 Ahead and Real-Time operations and market activities, as well as those of the Transmission  
4 Owners for the purpose of providing Local Service under Schedule 21 of the OATT. This  
5 increased the complexity of the LEP and resulted in initial development delays and release  
6 dates that were delayed from initial expectations.

7  
8 Once these initial development delays were resolved, testing of early versions of the product  
9 discovered bugs and that the software's functionality was limited. These issues have set back  
10 the software deployment schedule such that an extension to December 15, 2026 is necessary.

11  
12 I declare that this summary of the software deployment delays experienced by the ISO and the  
13 impact on the implementation of AARs is true and correct to the best of my knowledge and  
14 belief.

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16 \_\_\_\_\_  
17 M. David Hameedy, Director, Program Management Office, ISO New England Inc.

18 Executed on April 3, 2025