

191 FERC ¶ 61,163
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

May 30, 2025

In Reply Refer To:
ISO New England Inc. and the Participating
Transmission Owners Administrative
Committee
Docket Nos. ER22-2357-000
ER25-410-000

ISO New England Inc.
Attn: Graham Jesner
One Sullivan Road
Holyoke, MA 01040-2841

The Participating Transmission Owners Administrative Committee
Attn: Mary E. Grover, Esq.
c/o Eversource Energy
247 Station Drive, SE 100
Westwood, MA 02090

Dear Mr. Jesner and Ms. Grover:

1. On April 3, 2025, ISO New England Inc. (ISO-NE) and the Participating Transmission Owners Administrative Committee (PTO AC) acting on behalf of the Participating Transmission Owners (PTO) (collectively, Filing Parties) filed a motion for deferral of effective dates for revisions to the ISO-NE Transmission, Markets and Services Tariff (Tariff) accepted by the Commission in compliance with the requirements of Order Nos. 881 and 881-A¹, as well as conforming revisions accepted by the Commission in a separate docket,² from the Tariff revisions' current effective date of July 12, 2025 up to and including December 15, 2026.

¹ *Managing Transmission Line Ratings*, Order No. 881, 177 FERC ¶ 61,179 (2021), *order on reh'g*, Order No. 881-A, 179 FERC ¶ 61,125 (2022).

² On June 15, 2023, the Commission issued an order in Docket No. ER22-2357-000 accepting Filing Parties and Cross-Sound Cable's Order No. 881 compliance filing, subject to further compliance filings to be submitted within 60 days of the date of

2. Filing Parties state that they are experiencing delays that render the Tariff rules' current effective date of July 12, 2025 infeasible. Filing Parties explain that ISO-NE has been preparing to deploy its Limited Exchange Portal (LEP) software that is required for the PTOs and other market participants to transmit transmission line ratings, such as AARs, to ISO-NE, and for ISO-NE to extract the ratings for use in the Day-Ahead Market and Real-Time Market.³ Filing Parties explain that, due to vendor delays outside of ISO-NE and the PTOs' control, ISO-NE has experienced delays in the delivery of the LEP software needed to implement its Order No. 881 requirements. Filing Parties add that the requested 17-month deferral will allow for the completion of the development, testing, deployment, and training associated with the LEP software, which they contend is the "keystone" for ISO-NE and the PTOs' implementation of Order No. 881.⁴

3. Filing Parties explain that the delay in the availability of the LEP is the result of several factors. Filing Parties contend that 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 Tariff.⁵ Filing Parties explain that this increased complexity resulted in initial development delays. Filing Parties further explain that these delays, combined with subsequent software bugs and functionality issues contained in the initial release of the LEP software to ISO-NE, resulted in a significantly delayed overall schedule.⁶ Filing Parties add that 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 the same extension of time to implement

issuance of the order. *ISO New England Inc.*, 183 FERC ¶ 61,180 (2023) (June 2023 Compliance Order). On February 26, 2025, in Docket No. ER25-410-000, the Commission accepted ISO-NE's proposed revisions to Attachment C of the ISO-NE Open Access Transmission Tariff (OATT) to conform the requirements therein with those established in Order No. 881 and Attachment Q – Transmission Line Ratings, as they relate to the use of Ambient Adjusted Ratings (AAR) at ISO-NE's seams. *ISO New England Inc.*, Docket No. ER25-410-000 (Feb. 26, 2025) (delegated order).

³ Motion for Deferral at 2-3.

⁴ *Id.* at 7.

⁵ *Id.* at 8 (citing June 2023 Compliance Order, 183 FERC ¶ 61,180 at P 39).

⁶ *Id.*

the requirements of Order No. 881 contained in both Attachment Q and Schedule 21 of the OATT, i.e., until December 15, 2026.⁷

4. Filing Parties contend that there is good cause for granting the requested deferral because the vendor delays – which are outside of ISO-NE’s and the PTOs’ control – have resulted in the LEP software not being available prior the current July 12, 2025 effective date. Filing Parties also state that granting the extension is consistent with prior Commission decisions.⁸

5. Filing Parties request that the Commission grant their motion by June 2, 2025, to provide Filing Parties the certainty needed regarding their tariff obligations in light of the vendor delay in delivery of the LEP software needed for ISO-NE and the PTOs to implement Order No. 881.⁹ Filing Parties state that, in the event that implementation can proceed before that date, Filing Parties commit to providing the Commission notice at least two weeks prior to implementation and request that the Commission accept the earlier date. Filing Parties also state that, upon the Commission’s acceptance of its motion for deferral, the Filing Parties will, to the extent necessary, update relevant Tariff provisions pursuant to an FPA section 205 filing to ensure that the Tariff is consistent with the Commission’s action on Filing Parties’ motion for deferral.¹⁰

6. The Commission issued notice of Filing Parties’ motion on April 24, 2025, with answers due on or before May 1, 2025. None was filed.

7. We grant Filing Parties’ motion for deferral of effective dates to implement the Tariff revisions accepted by the Commission in its Order No. 881 compliance filing up to and including December 15, 2026. We find that good cause exists to defer the effective dates to implement the requirements of Order Nos. 881 and 881-A in order to provide additional time to complete the development and deployment of necessary software updates. Therefore, we grant Filing Parties’ request for deferral of effective dates to implement the Tariff revisions accepted by the Commission in its Order No. 881 compliance filing up to and including December 15, 2026.¹¹ To the extent that Filing

⁷ *Id.* at 9-10.

⁸ *Id.* at 7 n.20 (citing *N.Y. Indep. Sys. Operator, Inc.*, 186 FERC ¶ 61,237 (2024) (granting an extension of time to comply with the requirements of Order No. 881)).

⁹ *Id.* at 11.

¹⁰ *Id.* at 11 n.23.

¹¹ Commission staff will revise the effective date in eTariff to December 15, 2026, as requested.

Parties can implement their Tariff revisions prior to their requested effective date, Filing Parties may make a filing proposing an earlier effective date for their tariff provisions no less than 14 days prior to the date Filing Parties implement the tariff provisions, as Filing Parties commit.¹²

By direction of the Commission.

Debbie-Anne A. Reese,
Secretary.

¹² Filing Parties should use the eTariff Type of Filing Code 80 – Compliance Filing.