



To: ISO-NE Interconnection Customers

From: ISO New England Inc. (ISO)

Date: August 25, 2026

Subject: Post Transitional Cluster Study Milestones and Next Steps

Transitional Cluster Study Completed

Pursuant to Section 5.1.1.2 of Schedules 22, 23, and 25 of the ISO's Open Access Transmission Tariff (the "Tariff"), the ISO issued the final Transitional Cluster Study ("TCS") Report on August 6, 2026. The TCS was an unprecedented Interconnection Study for New England. The ISO, Interconnecting Transmission Owners, and Internal Affected Systems completed the study, including the identification of required upgrades and corresponding cost estimates, for approximately 4,800 MW of new capacity in 300 days. The final TCS Report reflects the study of 23 Interconnection Requests ("IRs"), comprising: 18 projects, representing ~3,800 MW, which were studied for both energy and deliverable capacity; and five projects, representing an additional ~1,000 MW, which were studied only for deliverable capacity since they were studied for energy previous to the TCS. The Order No. 2023 transition process, culminating in the final TCS Report, results in the ISO's queue being clear of all Interconnection Requests submitted prior to June 2024 and ready to accept new requests as described below.

Post Transitional Cluster Study Milestones

The table below lists the next milestones related to the TCS, consistent with the Interconnection Procedures in Section II of the ISO Tariff.

Transitional Cluster Study Milestones

<i>DATE</i>	<i>MILESTONE</i>
August 6, 2026	ISO issued the final TCS Report and responses to comments received on the interim TCS Report
August 21, 2026	ISO tendered draft Interconnection Agreements ("IA") to Interconnection Customers ("IC")
August 22 - October 20, 2026	IA negotiations, including meetings with individual ICs and Interconnecting Transmission Owners ("ITOs")

DATE	MILESTONE
October 20, 2026	ICs must request to execute IA, file IA unexecuted, or enter dispute resolution; otherwise IR is deemed withdrawn
ASAP after October 20, 2026	ISO issues final IAs for execution to ICs
October 30, 2026	ICs that request to file IA unexecuted on October 20 th provide IA deposit; otherwise, IR is deemed withdrawn
ASAP on or after November 4, 2026	ICs that request to execute IA on October 20 th provide IA deposit; otherwise, IR is deemed withdrawn

Under the ISO’s Interconnection Procedures, as accepted by the Federal Energy Regulatory Commission (“Commission”) in compliance with Order No. 2023, the ISO studies Interconnection Requests for both Network Resource Interconnection Service (energy) and Capacity Network Resource Interconnection Service (deliverability) in Cluster Studies, including the TCS. As a result, the interconnection process is now the primary means for the evaluation and determination of interconnection-related upgrades in order to participate in the New England Markets, consistent with the requested level of Interconnection Service. Ensuring an orderly interconnection process, including the completion of TCS activities and initiation of the subsequent Cluster, is therefore critical to the region.

The ISO understands that, in the case of some TCS projects, the transmission upgrade estimates identified in the TCS are considered by some ICs to be too costly to move forward with their proposed projects. The upgrade costs are driven largely by a proposed project’s requested level of Interconnection Service, its location, *i.e.* its selected Point of Interconnection, on the system (where some locations are more constrained than others), its proximity to other resources (e.g., existing resources, resources with executed Interconnection Agreements and other projects in the TCS), and the type and extensiveness of the required upgrades.

In order to move its interconnection process forward efficiently and effectively, which includes timely completion of its administration of the TCS, the ISO intends to follow the existing rules contained in its Commission approved Order No. 2023 compliant Tariff, without modification.

Additional Details Regarding Next Steps

Over the remainder of 2026, the ISO will undertake the steps described below.

Affected System Studies

- The ISO notified relevant ICs and Affected System Operators of applicable projects’ potential need for an Affected System Study on August 20, 2026, consistent with Section 3.6A.1 of Schedules 22 and 23.
 - The IC for a project that requires an Affected System Study may seek to extend its IA negotiation period pursuant to Section 11.2.1 of Schedules 22 and 23.

Interconnection Agreement Negotiation and Deposits

- The ISO tendered draft IAs to TCS projects on August 21, 2026.
 - Pursuant to Section 11 of Schedules 22/23, negotiations regarding these draft agreements are to be completed within 60 Calendar Days (*i.e.*, by October 20, 2026).
 - At the conclusion of this period, ICs will need to: 1) to execute the IA; 2) request that the ISO and ITO file the IA unexecuted with the Commission; or 3) initiate dispute resolution as to unagreed upon terms.
 - ICs will also need to provide an LGIA or SGIA Deposit to the applicable ITO (*i.e.*, 20% of identified Network Upgrade costs) at the date of IA execution or within ten (10) Business Days after the IC requests that the IA be filed unexecuted at the Commission.

Transitional Cluster Study Restudy

- ISO has concluded that, as of the date of this memo, it must evaluate if a restudy of the TCS is required due to the withdrawal of QP501, QP1513, QP1542, and QP1546.
 - The full extent of any necessary restudy of the TCS will depend on the ISO's consideration of the impact of these, and any other withdrawals by the time of restudy evaluation, on the previously completed analyses; this consideration will be done in coordination with the relevant ITO(s).
 - The ISO will perform this evaluation and make its restudy decision after LGIA/SGIA Deposits have been submitted. Determining the need for, and scope of, any necessary restudy at this stage reduces the risk of prolonged, multiple rounds of restudy, allowing the ISO to open the first Cluster Study window on time and for other committed projects to enter and move through the interconnection process. If a restudy is required, the ISO will conduct the TCS restudy in parallel with the formation of the base case for the first regular Cluster Study and the early parts of that study.
 - The ISO will use the current study methodology contained in Planning Procedure 5-6 for any restudy of the TCS.

Modifications to Interconnection Service Requests

- The ISO has determined that the current rules in the Tariff do not support the ability of TCS Projects to reduce their requested level of service from CNRIS to NRIS if the applicable ICs did not request the option to do so when executing and submitting a TCS Agreement.
 - Such a change would be a Material Modification under Schedules 22/23 because it would affect the cost and timing of other TCS Projects.
 - The TCS rules, as put-forth by the Commission in Order No. 2023, did not include any offramps, or service reduction allowances, due in part to the timing associated with the study, the penalties associated with withdrawal from the

TCS, and the corresponding expectation of the Commission that projects entering the TCS were committed to completing the interconnection process. In addition, such a change in the rules would require a full stakeholder process and a Section 205 filing with the Commission, which would likely cause delays for the first Cluster Study.

- While the ISO has committed to examine its CNRIS study methodology for future Clusters (as discussed further below), given the size and locations of the TCS projects for which upgrades were identified, and the nature and purpose of a deliverability standard, the ISO does not anticipate that any future methodology changes would result in a meaningful reduction of capacity deliverability related violations for TCS Projects with upgrades.

Lessons Learned and Study Process Improvements

- The ISO anticipates that its interconnection heatmap tool will launch in September of 2026, which is one full Cluster study cycle earlier than required by the Tariff. The interconnection heatmap tool will allow potential ICs to gain additional insight into post TCS system topology and potential constraints.
- In its Order No. 2023 Compliance Filing, the ISO committed to conducting a lessons-learned meeting with stakeholders following the TCS.
 - The ISO intends to schedule this meeting in Q4, 2026.
 - Topics that the ISO expects to cover may include, but are not limited to: the Cluster Study Process, characteristics of the New England system, potential communications improvements, potential information resources and tools to better allow ICs to anticipate and replicate study results, and possible process changes to provide upstream information and offramp opportunities.
- At the August 19 joint meeting of the NEPOOL Reliability and Transmission Committees, the ISO committed to reviewing the Capacity Capability Interconnection Service (“CCIS”) study methodology and stresses used in Interconnection Studies, with an objective to implement any changes in time for use in the first Cluster Study.
 - Through this review, any modifications to the methodology and resulting changes to PP5-6 must ensure that the CCIS standard defined in the Tariff is met. Any changes to study methodologies will need to carefully examine, including through stakeholder discussions, impacts on reliability, possible future congestion, and the service provided to currently connected ICs. The ISO intends to undertake this review with the Reliability Committee.

First Full Cluster Study

- The ISO will open the Cluster Request Window for the first regular Cluster on October 5, 2026, enabling other projects to enter the interconnection process to further support the integration of new resources into the region.
 - Prior to the Cluster Request Window opening, the ISO will conduct a [Cluster Study Process Participation Forum on September 8, 2026](#), during which

prospective Cluster Study participants will receive information regarding: the timeline and milestones associated with the Cluster Request Window and Cluster Engagement Window, requirements for submitting a valid IR, and other features of the new process.

- Opening the first Cluster Request Window in October of 2026 will mark the first time the ISO's interconnection queue has been open since 2024 and will kick off the implementation of the first full Cluster Study consistent with Order No. 2023.
- Further details regarding the schedule for the first Cluster Study can be found within the ISO's [Interconnection Process Guide](#).

The ISO appreciates the feedback received from ICs regarding the conduct of the TCS to date and the overall transition from serial to Cluster Interconnection Studies, and looks forward to continued collaboration as the region heads into the first Cluster Study process.