



To: ISO-NE Interconnection Customers

From: ISO New England Inc. (ISO)

Date: September 28, 2026

Subject: Additional Information Regarding Post Transitional Cluster Study Milestones and Next Steps

The Order No. 2023 transition process in the ISO’s Interconnection Procedures, through which the ISO has moved from a serial, first come, first served interconnection process, to a cluster study approach, culminated in the issuance of the final Transitional Cluster Study Report on August 6, 2026. With that transition process now nearing its completion, the ISO is issuing this memo to provide information regarding the final milestones in the process and details regarding next steps that the ISO will undertake to bring the process to a close.

The table below lists the remaining milestones related to the Transitional Cluster Study, consistent with the Interconnection Procedures in Section II of the ISO Tariff.

Remaining Transitional Cluster Study Milestones

<i>DATE</i>	<i>MILESTONE</i>
Present - October 20, 2026	Interconnection Agreement (“IA”) negotiations, including meetings with individual Interconnection Customers (“ICs”) and Interconnecting Transmission Owners (“ITOs”)
October 20, 2026	End of IA negotiation period; ¹ ICs must request to execute IA, file IA unexecuted, or enter dispute resolution; otherwise Interconnection Request (“IR”) is deemed withdrawn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30, 2026	ICs that request to file IA unexecuted on October 20 th must provide IA deposit; otherwise, IR is deemed withdrawn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after November 4, 2026	ICs that request to execute IA on October 20 th must provide IA deposit; otherwise, IR is deemed withdrawn

¹ Note that ICs with projects requiring an Affected System Study conducted by the New York Independent System Operator may delay this deadline pending the outcome of that study. ICs that require such studies have been notified by the ISO.

Additional Details Regarding Remaining TCS Milestones

In an effort to provide ICs, and all stakeholders, sufficient information to inform decisions regarding both the remaining TCS milestones outlined above, as well as the upcoming Cluster Request Window for the first Cluster Study, the ISO is providing the following clarifications and information.

Transitional Cluster Study Restudy

- The ISO will need to evaluate whether a restudy of the TCS is necessary to account for the withdrawal of IRs.
 - A decision regarding the extent of the need for, and scope of, any necessary restudy will be made on or soon after November 4, 2026 to account for any additional IR withdrawals up to that point in time; which is when IAs are required to be executed and IA deposits submitted pursuant to Section 11 of Schedules 22 and 23.
 - Determining the need for a restudy after IAs have been signed/IA deposits submitted will reduce the risk of prolonged, multiple rounds of restudy by providing sufficient time for ICs to determine whether they wish to move forward with the upgrades identified in the TCS.
 - 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.
 - Any restudy of the TCS will be performed consistent with the methodology used for the conduct of the TCS, which is contained in Planning Procedure 5-6 Rev. 14.

Reconciling Transitional Cluster Study Deposits

- Consistent with Section 5.1.1.2 of Schedules 22 and 23, the ISO is now in a position to calculate the potential Transitional Withdrawal Penalty liability of each IC with a project that participated in the TCS, which is nine times each project's total Interconnection Study costs since entering the ISO's interconnection queue. The ISO will inform each IC of its potential penalty liability no later than October 2, 2026.
- Where a TCS deposit that an IC submitted exceeds its potential penalty liability, the IC may 1) request that the balance be refunded (if the deposit was provided in cash) or 2) replace existing financial security with the lesser amount. ICs may use this refunded amount as all, or a portion of, their required IA Deposit should they execute an IA. The ISO, however, will continue to hold the remaining deposits for the purpose of administering Transitional Withdrawal Penalties if a project withdraws from the TCS.
- ICs are encouraged to reach out to their Project Coordinator with any questions about this process.

Transitional Withdrawal Penalty Treatment

- The Interconnection Procedures in Schedules 22 and 23 do not currently include rules that specify the manner in which Transitional Withdrawal Penalties will be disbursed. To

address this gap, the ISO plans to undertake revisions to its Interconnection Procedures, which would provide for Transitional Withdrawal Penalties to be treated in a manner similar to the methodology described in Section 3.7 of Schedules 22 and 23 that will be used for future Cluster Studies. Under this proposal and subject to FERC's acceptance of the Tariff rules reflecting the proposal, the ISO is considering treating the penalties as follows:

- Transitional Withdrawal Penalties will first be used to fund any necessary restudy of the TCS after any IR deposit funds forfeited by TCS projects are exhausted. To the extent any ICs with TCS projects are invoiced for restudy costs in the interim, they would be reimbursed following FERC acceptance of the proposed rules.
- Any Transitional Withdrawal Penalty funds remaining after restudy will then be allocated to offset any increase (as a result of the withdrawal) in Network Upgrade costs for non-withdrawn ICs, to the extent that those ICs shared Network Upgrades with withdrawn projects.
- After this further disbursement is complete, any remaining Transitional Withdrawal Penalty funds will be returned to the ICs with withdrawn IRs.
- The ISO will be initiating discussions on this proposal, including proposed Tariff language, and examples of how the disbursement will work in practice, at the October 14, 2026 meeting of the NEPOOL Transmission Committee.
- Following the stakeholder process, the ISO anticipates filing the proposed Tariff revisions with FERC by the end of 2026.

Interconnection Heatmap

- The ISO anticipates launching the interconnection heatmap tool before the opening of the Cluster Request Window for the first regular Cluster, 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 for supporting new capacity injections prior to the opening of the Cluster Request Window.

First Full Cluster Study and New Interconnection Software

- 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.
 - The ISO conducted a [Cluster Study Process Participation Forum on September 8, 2026](#), during which the ISO presented 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.

- Since that time, the ISO has also launched new software through which it will accept and validate new IRs. Information regarding the new [GridUnity GridInterConnect for Transmission](#) (GIC-T) can be found on the ISO's website, along with the [GridUnity's GIC-T User Guide](#).
- Additional information regarding the GIC-T tool, including how to register for a user account and training videos regarding its functionality are available on the [ISO's Training Materials webpage](#).

The ISO looks forward to completing the TCS process and opening the first Cluster Request Window to accept new IRs for the first time since June of 2024. In addition, the ISO will continue efforts to examine lessons learned from the TCS and examine its study methodology in advance of the beginning of the first Cluster Study. Additional information regarding those efforts will be distributed in the coming weeks.