UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Moraga Storage, LLC, et al., Complainants,	)	
v.	)	Docket No. EL26-112-000
ISO New England Inc., Respondent.	)	

ANSWER OF ISO NEW ENGLAND INC.

Pursuant to Rules 206 and 213 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure,[1] ISO New England Inc. ("ISO") submits this answer to the Complaint filed by Moraga Storage, LLC ("Moraga Storage"), River Mill Storage, LLC ("River Mill Storage"), Hecate Energy Medway Energy Center LLC ("Medway Energy Center"), Brough Storage, LLC ("Brough Storage"), and Partridge Storage, LLC ("Partridge Storage") (collectively, "Complainants").[2] The Complaint chiefly alleges that the ISO's Transitional Cluster Study ("TCS") and its results "are unjust and unreasonable because they violate the Commission's 'but-for' cost causation principle and the ISO[] Tariff."[3] For the reasons set forth below, the Commission should deny the Complaint.

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[1] 18 C.F.R. §§ 385.206, 385.213.

[2] *Moraga Storage, LLC v. ISO New Eng. Inc.*, Complaint Requesting Shortened Comment Period and Fast Track Processing and Request for Limited Waiver of Moraga Storage, LLC, et al., Docket No. EL26-112-000 (Sep. 30, 2026) ("Complaint"). The Complaint was brought pursuant to Federal Power Act ("FPA") sections 206, 306, and 309. 16 U.S.C. §§ 824e, 825e, 825h. On October 16, 2026, the Commission denied the Complainants' request for waiver filed as part of the Complaint. *Moraga Storage, LLC v. ISO New Eng. Inc.*, 197 FERC ¶ 61,041 (2026). Capitalized terms not defined herein shall have the meaning set forth in the ISO New England Inc. Transmission, Markets and Services Tariff ("Tariff").

[3] Complaint at 15.

I. EXECUTIVE SUMMARY

Complainants fail to meet their burden to show that the methodologies underlying the ISO's application of the Capacity Capability Interconnection Standard ("CCIS") to the TCS are flawed or otherwise unjust and unreasonable.[4] The ISO's witness, Mr. Alan McBride, explains in his Affidavit[5] that the methodology underlying the CCIS, which the ISO has applied consistently in past Interconnection Studies, produced Network Upgrades necessary to facilitate the interconnection of Complainants' proposed Generating Facilities at the level of Interconnection Service requested, and for which they were properly allocated cost responsibility.[6]

Further, Complainants fail to show that their proposal to have the Commission require the ISO to conduct a restudy of the TCS using a different, replacement methodology is just and reasonable. Indeed, it would be unjust and unreasonable, and a violation of the filed rate doctrine, to put in place unvetted remedies that are contrary to the Commission-approved transition process contained in the Tariff, result in harm to other Interconnection

[4] CCIS is defined as: [T]he criteria required to permit Interconnection Customer to interconnect a Generating Facility seeking Capacity Network Resource Interconnection Service [("CNRIS")] or an Elective Transmission Upgrade seeking Capacity Network Import Interconnection Service [("CNIIS")] in a manner that avoids any significant adverse effect on the reliability, stability, and operability of the New England Transmission System, including protecting against the degradation of transfer capability for interfaces affected by the Generating Facility seeking [CNRIS] or an Elective Transmission Upgrade seeking [CNIIS], and in a manner that ensures intra-zonal deliverability by avoidance of the redispatch of other Capacity Network Resources [("CNR")] or [ETU] with[CNIIS], as detailed in the ISO New England Planning Procedures. Tariff, Section II, Schedule 22, section 1 (Definitions); *ISO New England Planning Procedure No. 5-6: Interconnection Planning Procedures for Generation and Elective Transmission Upgrades*, ISO New England Inc., section 1.1.2. (rev. 15, Oct. 2, 2026), https://www.iso-ne.com/static-assets/documents/rules_proceds/isone_plan/pp05_6/pp5_6.pdf [https://perma.cc/XN5P-BKHL] ("PP5-6").

[5] Affidavit of Mr. Alan McBride, Vice President of System Planning of ISO New England Inc. ("McBride Aff.") attached hereto as Attachment A.

[6] Network Upgrades are defined in Schedule 22 as "the additions, modifications, and upgrades to the New England Transmission System required at or beyond the Point of Interconnection to accommodate the interconnection of the Large Generating Facility to the Administered Transmission System." Tariff, Section II, Schedule 22, section 1.

Customers, and may result in degradation of the deliverability to load from existing resources.

At bottom, the Complaint asks the Commission to disregard the ISO's consistent and longstanding implementation of the CCIS defined in the Tariff and detailed in the ISO's Interconnection Planning Procedure for Generation and Elective Transmission Upgrades ("ETU") ("PP5-6") and find that the costs allocated to Complainants for Network Upgrades[7] necessary for their Interconnection Requests are not just and reasonable. The Commission should not be so swayed. Complainants do not argue that the cost allocation requirements of the Tariff are unjust and unreasonable or inconsistent with principles of "but for" cost causation. Rather, they claim that the engineering assumptions underlying the methodology used to conduct the TCS are unreasonable and produced unreasonable results.[8] While PP5-6 is not subject to Commission review,[9] the ISO clearly acted consistently with both the Tariff and the planning procedures in conducting the TCS and allocating responsibility for Network Upgrades to Complainants. The Commission "generally allows transmission providers to exercise their engineering judgment when conducting [I]nterconnection [S]tudies, including deferring to transmission providers'

[7] Network Upgrades are defined as "the additions, modifications, and upgrades to the New England Transmission System required at or beyond the Point of Interconnection to accommodate the interconnection of the Large Generating Facility to the Administered Transmission System." Tariff, Section II, Schedule 22, section 1.

[8] *See* Complaint at 18-25.

[9] *See, e.g.*, *Urban Grid Solar Projects, LLC v. PJM Interconnection, L.L.C.*, 189 FERC ¶ 61,208 at P 45 (2024); *PJM Interconnection, L.L.C.*, 186 FERC ¶ 61,160, at P 77 (2024); *Sunflower Elec. Power Corp. v. Kan. Mun. Energy Agency*, 148 FERC ¶ 61,022, at P 35 n.65 (2014) (stating that, because manuals are not filed with and approved by the Commission, the Commission has no statutory obligation to enforce manual terms (citing *N.Y. Indep. Sys. Operator, Inc. v. Astoria Energy LLC*, 118 FERC ¶ 61,216 (2007); *Keyspan-Ravenswood, LLC v. FERC*, 474 F.3d 804, 810 (D.C. Cir. 2007))).

discretion regarding how to maintain a reliable [T]ransmission [S]ystem."[10] Implementation of the TCS according to the details contained in PP5-6 is exactly the type of engineering judgment to which the Commission has granted deference, and the Complaint offers no evidence to support a different outcome here.

As Mr. McBride explains, the ISO followed its Tariff and PP5-6 and drew on both its historical experience in conducting Interconnection Studies and its engineering expertise in applying the CCIS to the projects in the TCS seeking CNRIS.[11] In doing so, the ISO identified only those Network Upgrades necessary to ensure the intra-zonal deliverability of the Complainants' proposed Generating Facilities while ensuring that the existing performance of the system was not degraded. That Complainants were allegedly caught off guard by the associated costs and faced challenges replicating the analysis does nothing to render the ISO's application of its Tariff and the planning procedure to the TCS unjust or unreasonable. As described in Mr. McBride's Affidavit, the Network Upgrades identified were consistent both with the composition of the TCS, and the previous decade of development in New England between 2010 and 2020, which has resulted in decreasing system headroom as the region has integrated more than 16,000 megawatts of new resources at the transmission and distribution levels.[12]

Complainants core allegation is that the ISO violated Schedule 22 of the Tariff by evaluating deliverability across "inter-zonal" boundaries.[13] Not so. While the CCIS "ensures intra-zonal deliverability," it does so, as explained in Mr. McBride's Affidavit,

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[10] *RWE Clean Energy, LLC v. PJM Interconnection, L.L.C.*, 194 FERC ¶ 61,212, at P 42 (2026) ("*RWE Clean Energy*"); *see Oklo, Inc. v. PJM Interconnection, L.L.C.,* 196 FERC ¶ 61,231, at P 44 (2026).

[11] McBride Aff. ¶¶ 20-30.

[12] McBride Aff. ¶ 60.

[13] Complaint at 26.

by necessarily considering the effects of the proposed Generating Facility while delivering to that Load Zone, even if those effects are outside of the Load Zone. As reflected in PP5-6, the ISO assigns upgrades outside the Load Zone for which the Generating Facility seeks deliverability only in cases where the proposed facility has an observed distribution factor ("DFAX") greater than three percent with respect to the applicable Load Zone.[14] Mr. McBride explains that this is a key principle of the CCIS, which the ISO has applied consistently in numerous Interconnection Studies, reflects the tightly networked nature of the ISO's Transmission System, and addresses congestion conditions that could degrade the deliverability of Generating Facilities that are already interconnected. The Network Upgrades identified resulted from the application of the CCIS and the ISO's study methodology ensures that only incremental upgrades are assigned to a given Interconnection Customer. The ISO did not violate Schedule 22 and the Commission should deny the Complaint.

II. DESCRIPTION OF THE ISO

The ISO is the independent, private, non-profit entity that serves as the Regional Transmission Organization ("RTO") for New England. The ISO operates the New England bulk power system and administers New England's organized wholesale electricity market pursuant to the Tariff and the Transmission Operating Agreement with the New England Participating Transmission Owners ("PTO"). In its capacity as an RTO, the ISO has the responsibility to protect the short-term reliability of the New England Control Area and to plan and operate the system according to reliability standards established by the ISO, the

[14] *See* PP5-6, Table 3.1.1.1.

Northeast Power Coordinating Council, Inc. ("NPCC"), and the North American Electric Reliability Corporation ("NERC").

III. BACKGROUND

Complainants are Interconnection Customers that elected to participate in the ISO's TCS, as opposed to electing to proceed through the ISO's new Cluster Study Process and be subject to lower penalties, as all Interconnection Customers were allowed to do.[15] The ISO undertook the TCS, an expedited study process with heightened commercial readiness and penalty requirements, in response to, and consistent with, the Commission's Order Nos. 2023 and 2023-A mandates.[16] As shown below, and consistent with the goals of the Final Rule, the ISO's TCS process is an important piece of the ISO's compliance with the Commission's mandates in Order Nos. 2023 and 2023-A,[17] enabling the region's pivotal and efficient transition to a first-ready, first-served Cluster Study Process.[18]

A. Order Nos. 2023 and 2023-A Directives

In Order Nos. 2023 and 2023-A, the Commission adopted significant reforms to the Commission's *pro forma* procedures and agreements used to interconnect Large Generating Facilities. The purpose of the reforms was to address interconnection queue

[15] Note that with the exception of Medway Energy Center (QP1238), all of Complainants' Interconnection Requests were submitted after the issuance of Order No. 2023 and some immediately before the Eligibility Date to participate in the TCS. Queue positions beginning with QP1495 were submitted between late February 2024 and June 11, 2024.

[16] *Improvements to Generator Interconnection Procedures and Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *limited order on reh'g*, 185 FERC ¶ 61,063 (2023), *order on reh'g & clarification*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024), *petitions for review denied sub nom. Advanced Energy United v. FERC*, 185 F.4th 186 (D.C. Cir. 2026).

[17] Revisions to the ISO New England Inc. Transmission, Markets and Services Tariff in Compliance with Order Nos. 2023 and 2023-A, Docket No. ER24-2009-000 (May 14, 2024) ("ISO Order No. 2023 Revisions").

[18] Order No. 2023 at P 856 ("We concur with commenters that, given current interconnection queue backlogs in multiple regions, it is essential that the Commission craft a transition process.")

delays, backlogs, and inefficiencies and prevent undue discrimination for new technologies.[19] Among other things, the reforms implemented a first-ready, first-served Cluster Study Process that was intended to increase the speed of interconnection queue processing, and a one-time transitional process to move customers from the existing serial interconnection process to the new Cluster Study Process.

As relevant here, the Commission required transmission providers to offer existing Interconnection Customers up to three transition options, depending on which phase of the serial study process their Interconnection Requests were in. Specifically, transmission providers were required to offer: (1) a transitional serial facilities study, (2) a TSC, or (3) withdrawal from the interconnection queue without penalty. Order No. 2023 also imposed heightened requirements for those Interconnection Customers that elected to proceed through the transition process, including, a participation deposit equal to $5 million, and penalties equal to nine times the study cost.[20]

The transition process was specifically designed to avoid late-stage withdrawals and to be used by Interconnection Customers that were far along in their development process/intended to proceed with their proposed Generating Facilities.[21] The Commission made clear that Interconnection Customers that were already in the queue and that wished to avoid the heightened requirements could "opt to withdraw their [I]nterconnection [R]equests without penalty and wait for the first standard [C]luster [S]tudy with associated

[19] Order No. 2023 at P 37.

[20] Order No. 2023 at PP 817, 860; Tariff, Section II, Schedule 22, section 5.1.1.2.

[21] Order No. 2023 at P 859. With the exception of Medway Energy Center (QP1238), none of Complainants' Interconnection Requests experienced a long serial queue process such that the ISO would have considered them "late stage."

lower deposit [and penalty] requirements."[22] The Commission found that, overall, the transition process, including its heightened requirements, "appropriately balance[d] the need to move expeditiously to the new [C]luster [S]tudy [P]rocess with the need to respect the investments and expectations of [I]nterconnection [C]ustomers at an advanced stage in the existing interconnection process."[23]

B. The ISO's Compliance with Order Nos. 2023 and 2023-A and the Transition Process

Following an extensive and collaborative stakeholder process,[24] on May 14, 2024, the ISO, joined by the New England Power Pool ("NEPOOL") Participants Committee and the Participating Transmission Owners Administrative Committee ("PTO AC") on behalf of the PTOs (collectively with NEPOOL, PTO AC, and the ISO, "Compliance Parties"), filed a comprehensive, unanimously supported, compliance package for the region with the Commission, responding to the directives of Order Nos. 2023 and 2023-A and reflective of ISO's specific market structure and reliability standards.

Regarding the transition process, the Compliance Parties proposed to adopt the transition process set forth in Order No. 2023 in full, including the Transitional Serial Facilities Studies and a TCS, with limited deviations to align the process with terminology and service constructs of the ISO's pre-existing Tariff.[25] Additionally, in response to stakeholder input regarding the transition specifically, the Compliance Parties also requested an independent entity variation to offer Interconnection Customers additional

[22] *Id.*

[23] *Id.* at P 856.

[24] ISO Order No. 2023 Revisions at 71-75 (detailing the discussion of stakeholder engagement).

[25] ISO Order No. 2023 Revisions at 57.

processes intended to ensure that late-stage projects were not harmed by the transition and the inclusion of distribution level studies in the Base Case for the TCS.

The Compliance Parties further proposed, both for the transition, and the regular Cluster Study Process, independent entity variations to account for the ISO's previous performance of the study for CNRIS as part of the Forward Capacity Market ("FCM") qualification process rather than the Interconnection Study process.[26] These changes resulted in the CCIS testing being conducted as part of Cluster Studies, including the TCS, rather than as part of FCM qualification process.

On April 4, 2025, the Commission accepted, in part, the Compliance Parties' compliance package, effective August 12, 2024, and directed a further compliance filing.[27] With respect to the proposed transition process, the Commission accepted it as proposed except for a minor unexplained deviation regarding the opportunity to cure (which was subsequently corrected),[28] finding that the proposed transition process was either compliant with Order No. 2023 or met the Commission's independent entity variation.[29]

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[26] In 2008, to accommodate the implementation of the FCM, the ISO proposed Tariff revisions to establish that participation in the capacity market would require that participants qualify for a new type of Interconnection Service—CNRIS. ISO Order No. 2023 Revisions at 14. Resources would qualify for CNRIS by successfully participating in the FCM and completing the upgrades identified to accommodate the Interconnection Service request. The CNRIS option offered Interconnection Customers the ability to interconnect their facilities for capacity under the intrazonal deliverability standard, called the CCIS, up to the facility's CNR Capability. The CNR Capability is based on the Interconnection Customer's Capacity Supply Obligation obtained through the FCM. *See* Tariff, Section II, Schedule 22, section 1 (defining CNR as "that portion of a Generating Facility that is interconnected to the Administered Transmission System under the [CCIS]"); *id*. (defining CCIS as the criteria required to allow an Interconnection Customer to interconnect a Generating Facility with CNRIS "in a manner that avoids any significant adverse effect on the reliability, stability, and operability of the New England Transmission System").

[27] *ISO New Eng. Inc.*, 191 FERC ¶ 61,018, at PP 1-2, *order on compliance*, 192 FERC ¶ 61,185 (2025); *see also ISO New Eng. Inc.*, 191 FERC ¶ 61,243, at P 16 (2025) (accepting revised dates for the transition schedule).

[28] *ISO New Eng. Inc.*, 191 FERC ¶ 61,018, at P 185.

[29] *ISO New Eng. Inc.*, 191 FERC ¶ 61,018, at PP 181-84 (accepting the ISO's transitional process as compliant with Order No. 2023); *see also* Revisions to ISO New England Inc. Transmission, Markets and Services

C. Implementation of the Transitional Process Following the Tariff and PP5-6

The ISO's TCS process began on August 11, 2025, when the ISO formally tendered a TCS Agreement to each eligible Interconnection Customer, and culminated with the ISO's publishing of the Final TCS Report on August 6, 2026.[30] Below is a detailed description of that process.

Interconnection Customers that were tendered a TCS Agreement were required to sign and return the agreement to the ISO by October 10, 2025. Interconnection Customers were required to satisfy strict entry requirements, including a deposit of $1,000,000 or $5,000,000 (depending on the size and type of Interconnection Request), proof of exclusive Site Control for 100% of the proposed Generating Facility, a study deposit of either $100,000 or $250,000 (depending on the size and type of Interconnection Request), and certain technical data.[31]

Interconnection Customers participating in the TCS were provided an opportunity to elect the specific type and amount of Interconnection Service in the TCS Agreement: either NRIS, which is for energy capability only; or CNRIS, which is for energy and capacity capability.[32] All 23 projects studied as part of the TCS (the "TCS Projects)

Tariff to Revise Certain Dates Related to Order 2023 Transition Process, Docket No. ER25-2149-000 (May 2, 2025) (proposing to update certain dates relevant to the ISO's transition to the Cluster Study Process, moving them beginning in April 2025 and running through late 2026); *ISO New Eng. Inc.*, 191 FERC ¶ 61,243, at P 16 (accepting revised dates for the transition schedule).

[30] Transitional Cluster Study – Final Report, ISO New England Inc. (Aug. 6, 2026), https://media.wbur.org/wp/2026/09/TCS_Final-Report_Public.pdf [https://perma.cc/9J57-N94E] ("Final TCS Report").

[31] Tariff, Section II, Schedule 22, section 5.1.1.2; Final TCS Report at 50-51.

[32] Tariff, Section II, Schedule 22, section 5.1.1.2.

requested CNRIS.[33] Of the 23 projects studied in the TCS, 17 were located in Massachusetts, primarily in Western Massachusetts and Northwest of Boston; there were no proposed projects in Rhode Island; there was one project in Connecticut; there were two projects in Vermont; and there were two projects in Maine. As detailed in Mr. McBride's Affidavit, the Interconnection Customer's proposed locations of these projects and their accumulated impacts were the primary driver for the Network Upgrades identified in the TCS.

Interconnection Customers requesting CNRIS were afforded the option in the TCS Agreement to request that the ISO reduce the type of Interconnection Service specified in the Interconnection Request from CNRIS to NRIS if the ISO identified thermal violations in the analysis associated with CNRIS testing conditions that were not identified in the analysis associated with the NRIS testing conditions.[34] Where Interconnection Customers made this election in the TCS Agreement, the reduction of their Interconnection Requests from CNRIS to NRIS occurred automatically if and when a thermal violation was identified in the TCS.[35] Indeed, two Interconnection Customers, neither of which is the Complainants in this proceeding, made such election. One of these requests resulted in Interconnection Service being automatically reduced to NRIS.[36]

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[33] Final TCS Report at 12 (noting in Table 1-1 that 18 of the 23 projects were new Interconnection Requests that had not been previously studied for NRIS or CNRIS whereas the remaining five projects had been previously studied for NRIS and entered the TCS to be studied for deliverability only).

[34] Tariff, Section II, Schedule 22, section 5.1.1.2; *id.*, Schedule 22, Appendix 5, section 2.0 (Agreement includes a check box indicating an Interconnection Customer election to be downgraded to NRIS "where violations are identified in the thermal analysis associated with [CNRIS] testing."); ISO Order No. 2023 Revisions at 39-40 & n.114 (describing proposed Section 3.4.2 regarding reduction of Interconnection Service during study, which is identical to that in Tariff, Section II, Schedule 22, section 5.1.1.2).

[35] Tariff, Section II, Schedule 22, section 5.1.1.2.

[36] Final TCS Report at 10.

The ISO, together with the relevant Interconnecting Transmission Owners, conducted the TCS pursuant to Schedules 22, 23, and 25 (as applicable) and the ISO's PP5-6.[37] Studies to examine NRIS were conducted according to the Network Capability Interconnection Standard ("NCIS"),[38] and studies to examine CNRIS were conducted according to the CCIS.[39] Because all 23 projects in the TCS requested CNRIS, the ISO studied all projects under CCIS, meaning for both energy and capacity capability. Of these, there were 18 projects being studied for the first time, which were also studied under the NCIS for assessing the energy capability.[40] As compared to the scope of testing for NCIS, which evaluates whether a Generating Facility can inject power into the grid safely without violating thermal, voltage, or stability limits,[41] the scope of testing for CCIS goes a step further by testing whether the Generating Facility is fully deliverable (without re-dispatch of other capacity resources) within its Load Zone under peak capacity conditions.[42] PP5-6 explains the principles of CCIS as follows:

> The basic principle underlying the CCIS study approach is to ensure that there is no significant adverse impact as a result of the capacity, incrementally injected by Generating Facilities . . . , when it is

[37] The purpose of PP5-6 is to describe the scope of Interconnection Studies conducted pursuant to Schedules 22, 23 and 25, as well as ensure that the standard that governs NRIS and the standard that governs CNRIS are consistently applied in defining the scope and study assumptions for Generating Facility Interconnection Studies to determine how new Generating Facilities impact the Transmission System. PP5-6, section 1.0.

[38] NCIS is defined as "the minimum criteria required to permit Interconnection Customer to interconnect a Generating Facility seeking Network Resource Interconnection Service [("NRIS")]or ETU seeking Network Import Interconnection Service [("NIIS")] in a manner that avoids any significant adverse effect on the reliability, stability, and operability of the New England Transmission System, including protecting against the degradation of transfer capability for interfaces affected by the Generating Facility seeking [NRIS] or ETU seeking [NIIS], as detailed in the ISO New England Planning Procedures." Tariff, Section II, Schedule 22, section 1; *see* PP5-6, section 1.1.1.

[39] *Supra* note 4.

[40] The remaining five projects had been studied for NRIS under the serial interconnection process prior to the effective date of the Cluster Study rules and we only studied in the TCS for deliverability.

[41] PP5-6, sections 1.1.1, 3.1.1.

[42] PP5-6, sections 1.1.2, 2.3 ("Studies performed to meet the CCIS will only examine Peak Load Levels, while studies performed to meet the NCIS may examine any of the listed load levels.").

> dispatched while other resources are supplying capacity. The study is intended to ensure that there is no significant adverse impact on the reliability of the system, and that the ability to reliably and practicably operate the system is not compromised. Thus, when the new Generating Facility [] is added to the system models used in the study, capacity injections from other Generating Facilities, external transactions, other interface transfers or ETUs within the same Load Zone generally may not be reduced. This means that the proposed Generating Facility [] can operate without re-dispatch of other capacity resources. CCIS examines the deliverability of Generating Facilities [] under study to their associated Load Zones. A Generating Facility [] seeking CNRIS . . . will be determined to be in a single Load Zone if it can serve incremental load in that Load Zone, while satisfying the deterministic criteria of PP3, NPCC Directory 1 and NERC TPL-001.[43]

Study Base Cases incorporated all in-service, under construction, and planned transmission and generation projects expected to be in service by 2030. The 2025 Capacity, Energy, Loads, and Transmission ("CELT") report was used to determine the forecasted loads for the peak load levels evaluated.[44] The ISO made its detailed modeling assumptions available on the ISO website, subject to Critical Energy Infrastructure Information ("CEII") access rights.[45]

Technical evaluations in the TCS covered steady-state analysis, short-circuit analysis, transient stability, and specialized additional screenings. Steady-state analysis demonstrates compliance with applicable voltage and thermal loading criteria and identifies any system upgrades required to satisfy the criteria.[46] The steady-state portion

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[43] PP5-6, section 1.1.2.

[44] *See* Final TCS Report at 22; *ISO-NE 2025 CELT Report: 2025-2034 Forecast Report of Capacity, Energy, Loads, and Transmission*, ISO New England Inc. (May 1, 2025), https://www.iso-ne.com/static-assets/documents/100023/2025_celt.xlsx [https://perma.cc/G6GJ-TA95].

[45] *See Interconnection Request Studies*, ISO New England Inc., https://www.iso-ne.com/system-planning/interconnection-service/interconnection-request-studies [https://perma.cc/Z33C-3DA7] (providing a listed archive of CEII restricted and public accessible modeling assumptions, e.g., "NCIS Case Summaries" zip file dated July 3, 2026 and "TCS Dispatch Replication Guide" PDF file dated July 2, 2026, on the ISO website) (last visited Oct. 29, 2026).

[46] PP5-6, section 3.1.

of the study (i.e., steady-state redispatch) was conducted by testing the Transmission System without the proposed Generating Facilities under study dispatched (i.e., pre-project case) and then testing the Transmission System with the same system configuration but with the proposed Generating Facilities under study dispatched (i.e., post-project state).[47]

As explained in the "CCIS Redispatch Notes" in PP5-6,[48] the redispatch steady-state study occurs as follows:

- The percent loading on each monitored element is first determined without the proposed Generating Facilities . . . under study. This will provide a base reference loading for the monitored element.
    - The base reference loading is developed by completing a transfer from a source of all harmer resources with a DFAX of 3% or greater for the given monitored element to a sink of all other resources.
    - This transfer will be limited when a monitored element (including a modeled intrazonal stability or voltage limited interface) reaches a loading of 100% or when all harmer resources with a DFAX of 3% or above have been turned on up-to their established [Capacity Network Resource Capability]/CNIIS.
- Next, the percent loading on each monitored element will be calculated by adding the additional flow resulting from the proposed Generating Facilities . . . to the base reference loading.
    - The additional loading caused by the proposed Generating Facilities . . . is calculated based on a transfer from the proposed Generating Facilities . . . to resources that are not included in the list of harmer resources with a DFAX of 3% or greater for the given monitored element.

While a stability analysis and short circuit analysis is performed under the NCIS and was done for all newly-studied projects in the TCS, no additional stability or short circuit analysis is performed as part of the further studies performed under the CCIS.[49]

[47] PP5-6, section 3.3.

[48] PP5-6, Table 3.3.1.

[49] PP5-6, sections 4.0, 5.0.

On June 7, 2026, the ISO issued to all Interconnection Customers in the TCS, including Complainants, the Interim TCS Report identifying short-circuit limited exceedances, thermal voltage overloads, Contingent Facilities, stability issues, and preliminary non-binding cost estimates for Network Upgrades needed to address these issues and construction time estimates.[50] Interconnection Customers had a 30-Calendar Day window following receipt of the Interim TCS Report to submit comments.[51]

On August 6, 2026, the ISO issued the Final TCS Report together with a response to comments received from Interconnection Customers, including Complainants, thus fulfilling the requirements of section 5.1.1.2.[52] The Final TCS Report represented a complete Interconnection Study pursuant to section 5 of the *pro forma* Large Generator Interconnection Procedures ("LGIP") and *pro forma* Small Generator Interconnection Procedures ("SGIP"). Interconnection Customers that participated in the TCS did not have the option to elect a Facilities Study.[53]

The ISO tendered draft Interconnection Agreements to the Interconnection Customers remaining in the TCS, including Complainants, on August 21, 2026, and, consistent with the Tariff, began a 60-day negotiation period.[54] The 60-day negotiation period ended on October 20, 2026, at which point Complainants were required to determine

[50] Transitional Cluster Study – Interim Report, ISO New England Inc. (June 7, 2026), https://www.iso-ne.com/static-assets/documents/100036/final-tcs-interim-report-public.pdf [https://perma.cc/2MLR-5ZZC] ("Interim TCS Report").

[51] Tariff, Section II, Schedule 22, Section 5.1.1.2 .

[52] *See generally* Final TCS Report.

[53] Final TCS Report at 50 (citing TCS Agreement (stating that the TCS "combines the Cluster Study and Interconnection Facilities Study, in a single cluster study, followed by any needed restudies, to specify and estimate the cost of the equipment, engineering, procurement, and construction work needed to physically and electrically connect the Large Generating Facility to the Administered Transmission System")).

[54] *See* Tariff, Section II, Schedule 22, section 11 (Large Interconnection Procedure); *id.*, Schedule 23, section 11 (Small Interconnection Procedure).

whether they would: (1) execute their Interconnection Agreements; (2) request that unexecuted Interconnection Agreements be filed with the Commission; or (3) enter dispute resolution regarding unagreed upon terms in the Interconnection Agreement(s). As of October 23, 2026, the Interconnection Requests of Moraga Storage (QP1551), Mill Storage (QP1567), and Medway Energy Center (QP1238) have been withdrawn from the ISO's interconnection queue.[55]

Section 11.2.1 of Schedule 22 allows an Interconnection Customer subject to an Affected System Study to extend it Interconnection Agreement negotiation deadline to "thirty (30) Calendar Days after Interconnection Customer's receipt of the Affected System Study Report," unless the ISO "determines that further delay to the Large Generator Interconnection Agreement ("LGIA") execution date would cause a material impact on the cost or timing of an equal- or lower-queued Interconnection Customer."[56] The ISO notified the relevant TCS Projects and the relevant Affected System Operator of the potential need for an Affected System Study on August 20, 2026.[57] The Brough Project and Partridge Storage informed the ISO on October 16, 2026, that they would extend their deadlines consistent with section 11.2.1.

Simultaneously with submitting the executed Interconnection Agreement to the ISO or within ten Business Days after an Interconnection Customer request that the Interconnection Agreement be filed unexecuted, Interconnection Customers are required

[55] ISO requests that the Commission find that the Complaint is moot with respect to the Moraga Storage, Mill Storage, and Medway Energy Center given their decision to withdraw from the TCS.

[56] Tariff, Section II, Schedule 22, section 11.2.1. If an Interconnection Customer withdraws its Interconnection Request or if Interconnection Customer's Generating Facility otherwise does not reach Commercial Operation, a Transitional Withdrawal Penalty will be imposed on Interconnection Customer. The Transitional Withdrawal Penalty is equal to nine times Interconnection Customer's total study cost incurred since entering the queue. Tariff, Section II, Schedule 22, section 5.1.1.2.

[57] Tariff, Section II, Schedule 22, section 3.6A.1; *id.*, Section II, Schedule 23, section 3.6A1.

to provide an Interconnection Agreement deposit to the ISO equal to 20% of identified Network Upgrade costs minus the total amount of Commercial Readiness Deposit that the Interconnection Customer provided to the ISO for its Interconnection Request. An Interconnection Request would be deemed withdrawn for failure to follow these requirements.[58]

The table below is a summary of the foregoing milestones related to the TCS, consistent with the Interconnection Procedures in Section II of the ISO Tariff.[59]

DATE	MILESTONE
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 to Interconnection Customers
August 22 - October 20, 2026	Interconnection Agreement negotiations, including meetings with individual Interconnection Customers and Interconnecting Transmission Owners
October 20, 2026	Interconnection Customers must request to execute Interconnection Agreement, file Interconnection Agreement unexecuted, or enter dispute resolution; otherwise Interconnection Request is deemed withdrawn
ASAP after October 20, 2026	ISO issues final Interconnection Agreements for execution to Interconnection Customers
On or after October 30, 2026	Interconnection Customers that request to file Interconnection Agreement unexecuted on October 20th provide Interconnection Agreement deposit; otherwise, Interconnection Request is deemed withdrawn

[58] *Id.*, Section II, Schedule 22, section 11.3.1.1

[59] Memorandum from ISO New England Inc. to ISO-NE Interconnection Customers, *Post Transitional Cluster Study Milestones and Next Steps*, ISO New England Inc. (Aug. 25, 2026), https://www.iso-ne.com/static-assets/documents/100038/memo-regarding-next-steps-post-tcs-8-25-26.pdf [https://perma.cc/W5VV-DTMR].

ASAP on or after November 4, 2026	Interconnection Customers that request to execute Interconnection Agreement on October 20th provide Interconnection Agreement deposit; otherwise, Interconnection Request is deemed withdrawn

As of the date of this answer, of the remaining nine TCS Projects in the queue, two TCS Projects have been issued new LGIAs for execution, two extended their execution deadlines because they are subject to an Affected System Study by the New York Independent System Operator, and four projects are negotiating amendments to existing Interconnection Agreements to add CNRIS.

Throughout the TCS process, the ISO was transparent with the TCS Projects, including with respect to the ISO's study methodologies and its explanations of the results. As the Complaint appears to concede, the ISO held multiple meetings with the TCS Projects, including Complainants,[60] and responded to their comments and questions about the TCS results. The ISO also explained its inability to deviate from the terms of its Tariff.

D. Summary of Complaint

On September 30, 2026, the Complainants filed the instant Complaint. Complainants contend that the TCS results are unjust and unreasonable because they violate the Commission's "but-for" cost causation principles and the ISO Tariff. Complainants seek relief in the form of an order directing the ISO to restudy the TCS using a study process that addresses the alleged flaws identified in the Complaint. Alternatively, the Complainants request that the Commission order the ISO to modify its Cluster Study process to address the Complainants' alleged flaws, starting with the First Cluster Study.

[60] Complaint at 13-14.

In addition, the Complainants further request that the Commission either (1) order that TCS Interconnection Customers be permitted to reduce their CNRIS service to NRIS service and participate in the First Cluster Study for CNRIS service without satisfying any additional readiness deposit or order ISO to permit projects to withdraw from the TCS without incurring a withdrawal penalty.[61]

As shown below, the ISO complied with its Tariff and planning procedures, and Complainants' arguments are without merit and therefore should be denied.

IV. ANSWER TO COMPLAINT

Under section 206(b) of the FPA, "the burden of proof to show that any rate, charge, classification, rule, regulation, practice, or contract is unjust, unreasonable, unduly discriminatory, or preferential shall be upon . . . the complainant."[62] In addition, FPA section 306 states that "[a]ny person . . . complaining of anything done or omitted to be done by any . . . public utility in contravention of the provisions of this chapter may apply to the Commission by petition which shall briefly state the facts."[63] This burden consists of coming forward with a *prima facie* case.[64] To establish a *prima facie* case, the complainant must identify the alleged action or inaction that violates the specific standard or requirement as well as provide evidence as to how that action or inaction violates the

[61] On October 16, 2026, the Commission denied the Complainants' request for waiver filed as part of the Compliant. *Moraga Storage*, 197 FERC ¶ 61,041.

[62] 16 U.S.C. § 824e(b).

[63] 16 U.S.C. § 825e.

[64] *See, e.g.*, *Wholesale Customers of Ohio Edison Co. v. Ohio Edison Co.*, 22 FERC ¶ 61,314 (1983); *Coal. of Eastside Neighborhoods for Sensible Energy v. Puget Sound Energy, Inc.*, 183 FERC ¶ 61,057, at P 28, *order denying request for clarification*, 183 FERC ¶ 61,185 (2023).

standard.[65] The Commission has repeatedly found that "rather than bald allegations, [a complainant] must make an adequate proffer of evidence including pertinent information and analysis to support its claims."[66] As shown below, the Complaint fails to satisfy these requirements and, therefore, the Complaint should be denied.

A. The ISO Followed the Tariff and Its Interconnection Planning Procedures in Administering the TCS.

Complainants allege that implementation of the TCS was unjust and unreasonable, resulting in Network Upgrade costs that were not foreseeable and therefore in violation of the ISO's Tariff.[67] Complainants do not challenge the Schedule 11 cost allocation methodology for Network Upgrades themselves; rather, they argue that the *results* of the TCS are unjust and unreasonable based on allegations of unreasonable assumptions in the study methodology, and therefore, that the costs allocated pursuant to those results are inconsistent with the Commission's cost causation principles.[68] This argument requires the Commission to find that the TCS identified Network Upgrades are not needed for Complainants' interconnections, a finding that is simply not supported by the Complaint.

Under "but for" cost allocation, Interconnection Customers are allocated the costs for Network Upgrades that would not have been needed "but for" the interconnection of

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[65] 18 C.F.R. §§ 385.206(b)(1)-(2); *see, e.g.*, *City of Oakland v. Pac. Gas & Elec. Co.*, 167 FERC ¶ 61,097, at P 6 (2019) ("To establish a *prima facie* case under the Commission's regulations, a complainant must both identify the action or inaction alleged to violate the relevant statutory standard or regulatory requirement and explain how the action or inaction violates the standard or requirement." (citing 18 C.F.R. §§ 385.206(b)(1)-(2))); *Black Oak Energy LLC v. N.Y. Indep. Sys. Operator, Inc.*, 122 FERC ¶ 61,261, at P 31 (2008) ("In a proceeding under FPA section 206, the burden of proof to show that any charge or practice is unjust or unreasonable is on the complainant." (citing 16 U.S.C. § 824(e))); *330 Fund 1, LP v. N.Y. Indep. Sys. Operator, Inc.*, 126 FERC ¶ 61,151, at P 12 (2009) ("[T]he complainant[] has the burden of proof to establish the facts needed to support the claims in its section 206 complaint . . . .").

[66] *See, e.g.*, *Ill. Muni. Elec. Agency v. Cent. Ill. Pub. Serv. Co.*, 76 FERC ¶ 61,084, at 61,482 (1996).

[67] Complaint at 15-16.

[68] Complaint at 15.

the Interconnection Customer's generating facility.[69] The ISO's cost allocation requirements are aligned with this bedrock principle: if a Generator Interconnection Related Upgrade is required in order to satisfy the CCIS, the Generator Owner Interconnection Customer "shall be obligated to pay its share of the cost of such Upgrade."[70] As set forth in subsection IV.B below and in greater detail in Mr. McBride's Affidavit, the ISO's actions in conducting the TCS and the methodology underlying the studies are wholly consistent with the Tariff and PP5-6. As a result, the costs allocated to Complainants are just and reasonable, as, in each case, the Interconnection Customer is the "but for" cause of the need for the Network Upgrade.[71]

The Commission recently dismissed a complaint alleging similar violations of cost causation principles in the context of a transition Interconnection Study.[72] In *RWE Clean Energy,* the complainant challenged PJM Interconnection, L.L.C.'s ("PJM") application of its Generator Deliverability Procedure to determine the necessary Network Upgrades and cost allocation for its project. Similar to the ISO's PP5-6, the Generator Deliverability Procedure is set forth in PJM's manuals and provides that generators requesting interconnection to PJM must be deliverable in order to be a capacity resource.[73] The

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[69] *See Standardization of Generator Interconnection Agreements and Procedures*, Order No. 2003, 104 FERC ¶ 61,103, at P 694 (2003), (finding that "it is appropriate for the Interconnection Customer to pay initially the full cost of . . . Network Upgrades that would not be needed but for the interconnection"), *order on reh'g*, Order No. 2003-A, 106 FERC ¶ 61,220, *order on reh'g*, Order No. 2003-B, 109 FERC ¶ 61,287 (2004), *order on reh'g*, Order No. 2003-C, 111 FERC ¶ 61,401 (2005), *aff'd sub nom. Nat'l Ass'n of Regul. Util. Comm'rs v. FERC*, 475 F.3d 1277 (D.C. Cir. 2007), *cert. denied*, 552 U.S. 1230 (2008); *Midwest Indep. Transmission Sys. Operator, Inc*., 129 FERC ¶ 61,019, at P 23 (2009).

[70] Tariff, Section II, Schedule 11, section 5.

[71] *See, e.g.*, *Cage Ranch Solar, LLC v. Sw. Power Pool, Inc.*, 185 FERC ¶ 61,017, at PP 24-25, 36 (2023) ("*Cage Ranch Rehearing*") (rejecting complainants' "but for" and cost causation arguments where the assumptions used in the study process were "stakeholder approved, publicly posted, and applied consistently and in a non-discriminatory manner to all [] studies").

[72] *RWE Clean Energy*, 194 FERC ¶ 61,212.

[73] *See id.* at P 3.

complainant argued that PJM incorrectly applied the study methodology in the Generator Deliverability Procedure, producing unjust and unreasonable Network Upgrade costs and a resulting cost allocation that violated PJM's tariff. The Commission disagreed, holding that the complainant failed to meet its burden to show that PJM violated the tariff or acted inconsistently with its manuals.[74] The Commission specifically deferred to PJM's engineering judgment with respect to determining whether to model violations in alternating current ("AC") or direct current ("DC"), citing PJM's explanation that it "has long used DC loadings . . . because DC loadings are more stable than AC loadings for purposes of comparison, leading to more consistent results over the course of multiple [I]nterconnection [S]tudies."[75] The Commission further found that PJM reasonably explained its approach and applied its methodology consistently to all similarly situated projects.[76]

The arguments in *RWE Clean Energy* mirror the arguments in the Complaint. Here, Complainants claim that the ISO misapplied its planning procedure, resulting in the identification of unnecessary Network Upgrades and unjust and unreasonable cost allocations. While Complainants take issue with the assumptions underlying application of the CCIS, the ISO followed the requirements of PP5-6 in identifying Network Upgrades for all TCS Projects, and Complainants offer no evidence to demonstrate otherwise. The methodology and assumptions underlying the CCIS were drawn from the ISO's extensive experience in conducting Interconnection Studies, including studying groups of Interconnection Requests together for deliverability, and as set forth below and in Mr.

[74] *See id*. at P 37.

[75] *Id*. at P 42.

[76] *See id.* at P 43.

McBride's Affidavit, each assumption and modeling determination were consistent with sound engineering judgment.[77] The Commission should reach the same conclusion here as it did in *RWE Clean Energy*—Complainants have failed to meet their burden to demonstrate that the ISO's application of its Tariff and planning procedures was unjust or unreasonable.

Finally, the fact that the Network Upgrades identified by the ISO were "substantially higher than the Project Companies anticipated based on their own modeling" is not dispositive as to whether the ISO properly applied its Tariff to the TCS.[78] The question before the Commission is whether the ISO followed its Commission-approved Tariff and stakeholder supported planning procedures to the TCS, and the answer is unequivocally yes. The ISO recognizes that uncertainty regarding Network Upgrade costs is a significant concern for Interconnection Customers seeking to interconnect Generating Facilities on to the ISO's Transmission System. However, any changes to the ISO's implementation of its study methodology, to the extent that the region determines they are

[77] *Oklo Inc.*, 196 FERC ¶ 61,231, at P 44 ("[T]he Commission 'generally allows transmission providers to exercise their engineering judgment when conducting [I]nterconnection [S]tudies, including deferring to transmission providers' discretion regarding how to maintain a reliable [T]ransmission [S]ystem.'" (quoting *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,024, at P 71 (2026) (deferring to "PJM's engineering judgement and explanation that it has historically used regional topology upgrades assessments"); *RWE Clean Energy*, 194 FERC ¶ 61,212, at P 42)); *PJM Interconnection, L.L.C.*, 185 FERC ¶ 61,202, at P 47 (2023) (finding that a transmission owner reasonably exercised its engineering judgment in determining that a large, third-party generator, which could cause a breaker to trip therefore impacting reliability, represented a more significant reliability risk than the addition of a spare transformer, which would serve to increase reliability).

[78] Complaint, Attachment A (Affidavit of David Riester) at P 10; *see Cage Ranch Solar, LLC v. Sw. Power Pool, Inc.*, 183 FERC ¶ 61,138, at P 80 (2023) ("*Cage Ranch*") (rejecting complainants' argument that they were not the "but for" cause of the assigned network upgrades where complainants failed to show that the transmission provider improperly followed the cost allocation method set forth in its tariff and business practice manuals and the issues identified by complainants in "its own contingency analysis" were "irrelevant" given the analysis was conducted inconsistent with the transmission provider's tariff and manuals), *order on reh'g*, *Cage Ranch Rehearing*, 185 FERC ¶ 61,017, at PP 24-25, 27, *aff'd sub nom. Cage Ranch Solar, LLC v. FERC*, 2026 U.S. App. LEXIS 14227, No. 23-1227, at 5 (D.C. Cir. May 19, 2026) (unpublished).

necessary, should be fully vetted through a stakeholder process rather than imposed through an FPA section 206 complaint.

B. Inter-Zonal Impacts Resulting from Analyses Examining Intra-Zonal Deliverability Were Properly Considered and Allocated.

Complainants' sole allegation as to the ISO's violation of the Tariff is their claim that the definition of CCIS in Schedule 22 prohibits inter-zonal deliverability analyses.[79] Not only do Complainants misread the Tariff in making such an argument, they also fail to grasp the critical role the analysis plays in ensuring intra-zonal deliverability given the unique challenges of the ISO's transmission footprint.

As a threshold matter, the ISO did not violate the Tariff by applying an inter-zonal deliverability analysis to the TCS.[80] While Complainants are correct that the CCIS is designed to "ensur[e] intra-zonal deliverability," it does not follow that impacts associated with intra-zonal deliverability that occur outside of the Load Zone should be excluded from the analysis entirely. As Mr. McBride explains, the CCIS is an intra-zonal analysis designed to ensure the Generating Facility is deliverable to its Load Zone, but also it necessarily accounts for impacts outside of and bordering the Load Zone that result from a Generating Facility delivering within its own zone.[81]

PP5-6 specifically contemplates the potential for these impacts in the CCIS. Table 3.1.1.1 provides that "a Proposed Generating Facility or ETU will be associated with recorded overloads that meet any of the above-listed thresholds when, in relation to the

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[79] *See* Complaint at 25.

[80] Complaint at 25 (citing Tariff, Section II, Schedule 22, section 1).

[81] *See, e.g.*, McBride Aff. ¶ 42 (explaining why an intra-zonal standard does not mean that Upgrades can never be identified on the border of a Load Zone or outside of a Load Zone—that is, "[p]ower does not stop flowing at administrative boundaries. Rather, it flows from power sources to power sinks according to the relative impedance of the connecting transmission facilities. This phenomenon . . . can manifest in affected system impacts near the seams of neighboring systems.").

Load Zone to which they are interconnecting and the overloaded transmission element: The proposed Generating Facility or ETU has an observed DFAX greater than 3%."[82] That text's corresponding footnote provides: "For CCIS, DFAXs are calculated by transferring from the Generating Facility or ETU to the associated Load Zone."[83] Taken together, this requirement means that only if a proposed Generating Facility has an observed DFAX of 3% or greater when delivering to its Load Zone will it have the responsibility to address that violation. As Mr. McBride explains, *only if the overload is relevant to the Generating Facility's deliverability into its own Load Zone* will the Generating Facility be assigned Network Upgrade costs.[84] If no such overload is found relevant with respect to intra-zonal deliverability, the Generating Facility is not assigned costs in accordance with Schedule 11.[85] Complainants' assertion that the "modeling approach required the transitional cluster projects to deliver their capacity across inter-zonal boundaries, and assigned costs associated with inter-zonal delivery to the TCS rather than to load"[86] is, therefore, inconsistent with realities of power flow over the relative impedance of the Transmission System, the requirements of PP5-6, and factually incorrect as to its application to the TCS.

[82] PP5-6, Table 3.1.1.1 (footnote omitted).

[83] *Id*., Table 3.1.1.1 n.27.

[84] *Id*.; *see also* McBride Aff. ¶ 44 ("[A]fter identifying any violations using the approach described above, the ISO then conducts a transfer from the new CNRs generators under study to the Load Zone load and only identifies upgrade responsibility in the cases where the proportional impact, i.e., [DFAX], is above the threshold specified in the procedure. It is certainly possible for CNRs under study to overload a transmission facility in a neighboring zone, or a facility on the border of its zone, while delivering to its own Load Zone, and, in those cases, the CNRs under study should be responsible for those upgrades.").

[85] McBride Aff. ¶ 44.

[86] Complaint at 26.

Examining the system impacts through such analyses to ensure intra-zonal deliverability is critical given the tightly networked nature of the New England Transmission System. Mr. McBride's Affidavit details the impact of unanticipated congestion on existing Generating Facilities within a geographically relevant transmission network.[87] If the ISO did not evaluate inter-zonal impacts of analyses ensuring intra-zonal deliverability for proposed Generating Facilities with an observed DFAX of more than 3%, then existing Generating Facilities in neighboring Load Zones could experience unanticipated congestion that would have the effect of degrading their deliverability and resulting ability to participate in New England Markets.[88] The ISO has long employed CCIS analyses in this manner to ensure that the existing generation fleet is not harmed by the addition of new Interconnection Customers. As such, the costs resulting from overloads identified through impacts associated with intra-zonal deliverability are in fact those "minimally necessary to achieve deliverability" to the proposed Generating Facility's Load Zone.[89]

Complainants' reliance on *RENEW Northeast, Inc. v. ISO New England* is misplaced.[90] The operations and maintenance costs ("O&M") at issue in that proceeding were downstream O&M costs associated with Network Upgrades that Interconnection Customers were assigned in their respective system impact studies, not the costs for constructing those upgrades. In that case, the Commission determined that those *ongoing*

[87] McBride Aff. ¶¶ 51-58.

[88] McBride Aff. ¶¶ 51-60.

[89] *N.Y. Indep. Sys. Operator, Inc.*, 122 FERC ¶ 61,267, at P 45 (2008).

[90] Complaint at 28 (citing *RENEW Ne., Inc. v, ISO New Eng., Inc.*, 189 FERC ¶ 61,216, at P 97 (2024) ("*RENEW*")).

costs were not directly attributable to Interconnection Customers' Generating Facilities.[91] In other words, Interconnection Customers were being charged for ongoing Network Upgrade O&M costs for facilities without consideration of the fact that other Transmission Customers (i.e., load) were benefitting from the upkeep of Network Upgrades which are subsequently Pool Transmission Facilities. The examination of system impacts resulting from intra-zonal deliverability analysis prevents the inverse occurrence. If a proposed Generating Facility will cause overloads that create congestion for Interconnection Customers in neighboring Load Zones, that Generating Facility is the "but for" cause of that congestion, and should be allocated the resulting costs pursuant to Schedule 11. The ISO, therefore, did not violate its Tariff in allocating costs identified through inter-zonal deliverability analyses to Complainants.

C. The ISO's Implementation of the TCS Study Process Was Just and Reasonable

Complainants offer multiple theories of how the ISO's implementation of the TCS was inconsistent with principles of cost causation. Specifically, Complainants assert (1) the TCS's capacity-deliverability methodology is not appropriate for Cluster Studies;[92] (2) the ISO allocated the cost of upgrades already on the "Asset Condition List" to new Interconnection Requests;[93] and (3) the TCS identified upgrades "beyond those minimally required to accommodate the new cluster."[94] As set forth below and in Mr. McBride's Affidavit, none of these theories pass muster. Simply put, the ISO's implementation of the

[91] *RENEW*, 189 FERC ¶ 61,216, at P 97.

[92] Complaint at 18-19.

[93] Complaint at 21.

[94] Complaint at 22-23.

TCS identified only those Network Upgrades necessary to provide each Interconnection Customer the level of Interconnection Service they requested.

1. The capacity-deliverability methodology was properly applied to the TCS, and Complainants misstate its application to the serial queue process.

The Complaint argues that the capacity-deliverability study methodology produced a "flawed reference case" because it was designed and used in the ISO's serial interconnection process.[95] This distinction is meritless.

The assumptions underlying capacity-deliverability study methodology set forth in PP5-6 are appropriate regardless of whether an Interconnection Request is being studied serially or as part of a cluster.[96] Indeed, as Mr. McBride's Affidavit explains, under the serial interconnection process, the ISO evaluated Interconnection Requests seeking CNRIS in Capacity Network Resource Group Study ("CNR Group Study") performed as part of Forward Capacity Auction ("FCA") qualification process, meaning that even during the serial interconnection process all CNRIS Interconnection Requests seeking to newly qualify for the FCA were studied together, using same CCIS methodology and software, and subject to the same system stresses.[97] Put simply, the CNR Group Study was a form of a Cluster Study conducted for capacity purposes.[98]

As set forth in Mr. McBride's Affidavit, the only difference between the serial analysis and the cluster analysis is the order in which Network Upgrade responsibility is

[95] Complaint at 18.

[96] *See* McBride Aff. ¶¶ 47-50.

[97] *Id*.

[98] ISO Order No. 2023 Revisions at 15 ("The CNR Group Study is a form of a cluster study conducted for capacity purposes. In the CNR Group Study, pursuant to Section 3.2.1.3 of Schedule 22, CNRIS Interconnection Requests are studied in serial queue order (based on the first-served approach) relative only to the Interconnection Requests of resources also seeking to qualify to participate in the same [FCA].").

assigned.[99] Under the serial process, responsibility for Network Upgrades was assigned in queue order. The first (or earlier-) queued Interconnection Request included in the FCA group qualification (i.e., the CNR Group Study) would be assigned responsibility for a Network Upgrade, followed serially by other (later-queued) projects contributing to the overload requiring the Network Upgrade remedy. Each new project proposed in the Interconnection Requests included in the CNR Group Study was assigned Upgrade costs only for *its incremental addition* to an identified overload.[100] By contrast, the TCS allocates costs collectively to all projects responsible for an overload at the same time. Under both processes, Interconnection Customers pay only for those upgrades required "but for" their requested interconnection. As such, Complainants merely raise a distinction without a difference, which is insufficient to sustain their burden under FPA section 206.

Next, Complainants claim that some of the Base Case conditions assumed by the ISO resulted in violations before any TCS Project was added, because the ISO modeled them in DC, while verifying post-TCS Project violations in AC.[101] As discussed above, the Commission has previously given deference to a transmission provider's engineering judgment with regard to application of AC versus DC modeling.[102] Nevertheless, the ISO's use of DC modeling is both consistent with sound engineering judgment and a widely-used industry approach appropriate to achieve the redispatch objective of PP5-6 for CCIS.

As explained in the "CCIS Redispatch Notes" for steady-state redispatch, "the percent loading on each monitored element is first determined without the proposed

[99] *See* McBride Aff. ¶¶ 47-50.

[100] *See* McBride Aff. ¶¶ 47-50.

[101] Complaint at 18-19.

[102] *See RWE Clean Energy*, 194 FERC ¶ 61,212, at P 42.

Generating Facilities or ETUs under study."[103] DC modeling captures "real" power flow on the Transmission System, meaning the flow of energy absent reactive power necessary to maintain system stability.[104] Mr. McBride explains that generating a Base Case using DC modeling is an industry standard practice because it allows a transmission provider to linearize and vertically accumulate impacts and easily test for overloads absent the reactive power captured by AC modeling.[105]

Mr. McBride states that while the Base Case is modeled in DC, AC modeling is unlikely to produce a meaningfully different result.[106] The ISO concedes that, in an extreme case, it is possible that an upgrade could be identified under the DC approach that would not be identified under a fully AC approach. However, it is similarly (un)likely that the opposite could occur.[107] All of this is made further unlikely by the thresholds of impact that are applied to the testing (i.e., the DFAX and overload thresholds used to identify violations). This remote possibility, however, does not outweigh the benefits and efficiency of the widely-used DC approach for the automated fast batch processing of large numbers of flowgates, and the ISO does not believe that the less efficient all-AC approach should be pursued. Following these steps, the ISO uses AC verification when reporting final violations in order to articulate the final results.[108] This mix use approach attempts to

[103] PP5-6, Table 3.1.1.1

[104] McBride Aff. ¶ 34.

[105] McBride Aff. ¶ 34.

[106] McBride Aff. ¶ 36.

[107] McBride Aff. ¶ 36.

[108] McBride Aff. ¶ 34.

take advantage of the benefits of both DC and AC solutions (i.e., an overall automated approach with fast batch processing and articulated final results).[109]

Citing the Commission's holding in *Tenaska*,[110] Complainants argue that the presence of overloads in the reference case of a Cluster Study "presents a very different case than overloads in the serial study context."[111] This argument conflates the Base Case requirements of Schedule 22 of Section II of the Tariff with the secured case that the ISO creates in order to undertake the steady-state redispatch analysis conducted under the TCS.

Prior to undertaking a Cluster Study (including the TCS), the ISO forms a Base Case comprising Base Case Data, which is defined in Schedule 22, as the "power flow, short circuit, and stability data bases used for the Interconnection Studies by the System Operator, Interconnection Customer, Interconnecting Transmission Owner, or any Affected Party or Internal Affected Parties as deemed appropriate by the System Operator in accordance with applicable codes of conduct and confidentiality requirements."[112] Section 2.3 further provides that the Base Case "should reasonably represent those used during the most recent Interconnection Study and be representative of current system conditions as of the most recent Interconnection Study," and "shall include all generation projects and transmission projects that are proposed for the New England Transmission System and any Affected System or Internal Affected System and for which a transmission expansion plan has been submitted and approved by the applicable authority and which, in

[109] *Id.*

[110] Complaint at 20 (citing *Tenaska Clear Creek Wind, LLC v. Sw. Power Pool, Inc*., 177 FERC ¶ 61,200, at P 103 (2021) ("*Tenaska"*), *order on reh'g,* 180 FERC ¶ 61,160 (2022), *order on reh'g,* 182 FERC ¶ 61,084 (2023), *petitions for review denied sub nom. Tenaska v. FERC*, 108 F.4th 858, 871 (D.C. Cir. 2024)).

[111] Complaint at 20.

[112] Tariff, Section II, Schedule 22, section 1 (defining Base Case Data).

the sole judgment of the System Operator, may have an impact on the Interconnection Request."[113]

Following the formation of the Base Case, the ISO creates a secured case upon which to conduct studies. Also referred to as the "reference case," consistent with PP5-6, this case is constructed such that "[t]he percent loading on each monitored element is first determined *without the proposed Generating Facilities or ETUs under study*. This will provide a base reference loading for the monitored element."[114] As such, the ISO's secured reference is akin to the "pre-transfer case" in *Tenaska* in that adding new generation to that case only evaluates deliverability to the existing Transmission System. Complainants' attempts to claim that the Base Case constructed under Schedule 22 should be used to conduct studies without any additional inputs for purposes of assessing deliverability is misplaced, clearly not in line with the process described in PP5-6, and should be rejected.[115]

2. The "Asset Condition List" Is Not a Legitimate Basis for Arguing that the TCS Results Are Unjust or Unreasonable or that the ISO Violated Its Tariff.

Complainants blanketly assert that "[s]everal of the assets identified as Upgrades were already identified by ISO[] on the Asset Condition List,"[116] and as such, the Network Upgrades necessarily "provide[] benefits to the system as a whole" and should not be

[113] *Id.*, Section II, Schedule 22, section 2.3.

[114] PP5-6, Table 3.3.1, CCIS Redispatch Notes (emphasis added).

[115] *See, e.g.*, *Cage Ranch Rehearing* at P 25 ("[T]he Commission has found that a cost allocation method does not cease being just and reasonable because application of the method 'sometimes results in an interconnection customer being responsible for network upgrades to a facility that is overloaded in the pre-transfer case.'" (quoting *Tenaska Clear Creek Wind*, 182 FERC ¶ 61,084, at P 36)).

[116] Complaint at 21.

allocated to Complainants as "but-for" upgrades.[117] Complainants misunderstand the scope of asset condition projects and the implementation of Schedule 11, section 5, in the Tariff and their argument is unsupported and without merit.

At the outset, asset condition projects are PTO-identified capital projects designed to replace or reconstruct aging, deteriorating, or obsolete transmission elements, which are undertaken to maintain the integrity of the system.[118] These projects do not fall under the ISO's regional planning responsibilities,[119] as they do not involve system expansion driven by the categories of needs identified in that process. [120] Accordingly, the inclusion of PTO-identified asset condition project on the Asset Condition List that the ISO maintains[121] does not mean it will be "rightsized" or upgraded to account for new generation. Indeed, the project's inclusion on the list is a sign that transmission elements need to be replaced in kind.

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[117] *Id.* (quoting Tariff, Section II, Schedule 11, section 5). Section 5 provides in relevant part as follows: "If a Generator Interconnection Related Upgrade . . . is required in order to satisfy the [CCIS] or the [NCIS] (or its predecessor standard) (collectively, 'Interconnection Standards') . . . , the Generator Owner . . . shall be obligated to pay its share of the cost of such Upgrade, including all Direct Interconnection Transmission Costs and any applicable tax gross-up amounts, to the extent such costs would not have been incurred but for the interconnection; provided that, if the ISO determines that a particular Upgrade provides benefits to the system as a whole as well as to particular parties, then the cost of such Upgrade shall be allocated in the same way as Reliability Transmission Upgrades, as detailed in the ISO New England Planning Procedures."

[118] *See Transmission Owner Asset Management*, ISO New England Inc., https://www.iso-ne.com/system-planning/transmission-planning/transmission-owner-asset-management [https://perma.cc/M6SK-G4J4] (last visited Oct. 29, 2026). For example, wooden poles that support transmission lines may have been degraded by woodpecker holes and need replacement with steel poles.

[119] *See* Tariff, Section II, Attachment K (Regional System Planning Process).

[120] *See Cal. Pub. Utils. Comm'n v. Pac. Gas & Elec. Co.*, 164 FERC ¶ 61,161. at PP 66-67 (2018) (holding that Order No. 890 was meant to "remedy opportunities for undue discrimination in *expansion* of the transmission grid," not "asset management projects and activities includ[ing] maintenance, repair, and replacement work, and infrastructure security, system reliability, and automation projects . . . to maintain its existing electric [T]ransmission [S]ystem and meet regulatory compliance requirements."), *reh'g denied*, 168 FERC ¶ 61,171 (2019).

[121] *Regional System Plan and Related Analyses*, ISO New England Inc., https://www.iso-ne.com/system-planning/system-plans-studies/rsp/ [https://perma.cc/WF45-L24M] (posting available Asset Condition Lists on the ISO's website) (last visited Oct. 29, 2026).

This is not to say that interconnection costs assigned to Interconnection Customers pursuant to Schedule 11, section 5, do not account for Network Upgrades with multiple needs—they do. Consistent with Schedule 11, section 5, and its implementing Planning Procedure No. 4-1, where an Interconnection Study, including the TCS, identifies a needed upgrade on an asset that is the same or similar to an asset condition project included on the Asset Condition List with a "Planned" or "Proposed" status, consistent with the treatment of projects on the Regional System Plan ("RSP") or RSP Project List, the ISO identifies the upgrade as a "Contingent Facility" in the Interconnection Agreement and specifies that the Interconnection Customer would only be responsible for costs of accelerating or increasing the PTO-identified asset condition project.[122]

The ISO appropriately allocated costs to Interconnection Customers participating in the TCS based on these principles. To the extent there are any similar or same "Planned" or "Proposed" regional or asset condition projects on the respective project lists and therefore deemed Contingent Facilities, the Interconnection Agreements for those projects will reflect that fact.[123] Complainants argue that the ISO's assignment of Network Upgrade costs amounted to a violation of the ISO Tariff, but they fail to identify the parts of the

[122] Similarly, Generator Interconnection Related Upgrades may be affected by whether an upgrade needed for the interconnection of the Generating Facility has already been included in the RSP or RSP Project List for reasons other than the Generating Facility interconnection. For example, if an upgrade identified as required to accommodate the Generating Facility is already in the RSP Project List as a Reliability Upgrade or Economic Upgrade, its costs potentially may not be assigned to the Generator Owner Interconnection Customer even if the same upgrades would be required for the Generating Facility interconnection. *See ISO New England Planning Procedure No. 4-1: Implementation of Cost Responsibility Determination for Schedule 11 Category C Project Transmission Upgrades in Circumstances of Multiple Needs*, ISO New England Inc., 4-5 (rev. 3, June 27, 2023), https://www.iso-ne.com/static-assets/documents/rules_proceds/isone_plan/pp05_6/pp5_6.pdf [https://perma.cc/S6L4-D8E9] ("PP4-1").

[123] *See Cage Ranch* at P 82; *Cage Ranch Rehearing* at P 28 (finding that, consistent with its tariff and manuals, the transmission provider correctly excluded Network Upgrades that had been selected as part of the transmission provider' transmission planning process from the Interconnection Study Base Case because, as of the date the study commenced, the Network Upgrades had not yet been approved by the board and, as a result, *Cage Ranch* was the "but for" cause of the Network Upgrades).

process described above the ISO failed to do or did incorrectly. Complainants also make no attempt to identify the costs that they believe were inappropriately allocated. Given these facts, the Commission should find that the Complainants failed to meet their burden to show that the ISO violated its Tariff.

3. The Identified Upgrades Are Those Minimally Required for the Interconnections at Issue.

Complainants further claim that the TCS study process "identified Upgrades beyond those minimally required to accommodate the new cluster" by using a reference dispatch that was more severe than the CCIS requires.[124] Not so. PP5-6 provides that "[t]he base reference loading is developed by completing a transfer from a source of all harmer resources with a DFAX of 3% or greater for the given monitored element to a sink of all other resources. This transfer will be limited when a monitored element (including a modeled intrazonal stability or voltage limited interface) reaches a loading of 100% or when all harmer resources with a [DFAX] factor of 3% or above have been turned on up-to their established [Capacity Network Resource Capability] . . . ."[125] Thus, the ISO evaluates the incremental impact of the cluster as a whole, based on the amount of CNRIS requested by each resource on monitored elements that approach, but do not exceed, 100% loading.

As Mr. McBride explains, interconnection projects only are required to address their incremental impact on the Transmission System and are not required to make the existing CNR any more deliverable.[126]

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[124] Complaint at 22-23.

[125] PP5-6, Table 3.3.1, CCIS Redispatch Notes. ,

[126] McBride Aff. ¶¶ 26, 30.

D. Complainants' Requested Relief Should Be Denied.

Complainants propose to jettison the ISO's recently approved Order No. 2023 compliant Tariff and stakeholder-vetted and supported planning procedures in exchange for their preferred, unvetted replacement study rules and methodology. Said differently, the Complainants' have failed to demonstrate that their replacement rules are just and reasonable. Indeed, it would be unjust and unreasonable to put in place replacement study standards that have not been demonstrated to be just and reasonable and not unduly discriminatory or preferential, have not been vetted with stakeholders, will delay the TCS and new Cluster Study Process, and result in harm to other Interconnection Customers in the TCS, as well as potentially degrade deliverability for existing resources.

As stated above, the TCS was conducted consistent with the Tariff and the ISO's planning procedures. The methodology and assumptions underlying the TCS were not only consistent with governing documents but also drawn from the ISO's extensive experience in conducting Interconnection Studies, including studying groups of Interconnection Requests seeking CNRIS to participate in the FCA. Given the inherent cost implications to generation and load, the adoption of any new methodologies and assumptions would need to be thoroughly vetted with all stakeholders.

Further, as Complainants appear to acknowledge,[127] conducting a restudy at this late stage would delay finalization of the transition study process and thwart the region's ability to move forward with the first Cluster Study Process. Such a result runs counter to the purpose of the Order Nos. 2023 and 2023-A transition study process, which was designed by the Commission to ensure that Interconnection Customers that are first-ready are able

[127] Complaint at 31 ("However, the Project Companies recognize that ISO[] and the market face significant pressure to move forward with the first Cluster Study.")

to interconnect to the Transmission System in a "reliable, efficient, transparent, and timely manner".[128]

Finally, the remedy sought by Complainants would most certainly adversely impact other Interconnection Customers that have complied with the Schedule 22 and remain in the queue.[129] As one Interconnection Customer that remains in the queue pointed out, its proposed Generating Facility's at-risk exposure "will increase substantially if additional studies are performed" and that "[t]he penalty-free withdrawal . . . would deplete the forfeited deposits that the Tariff directs ISO[] to apply to restudy costs of customers that remain in the cluster [and to offset Network Upgrade cost increases for those customers]."[130]

Alternatively, Complainants ask the Commission to allow them to avoid the consequences of their earlier decisions to participate in the TCS and to not elect to reduce their Interconnection Request from CNRIS to NRIS during the TCS. The Commission should not do so. Complainants' request to be permitted to reduce their Interconnection Request from CNRIS to NRIS is also retroactive in nature and prohibited by the filed rate doctrine.[131] The deadline for Complainants to elect the option to reduce their Interconnection Requests from CNRIS to NRIS has passed. As explained above, the Tariff

[128] Order No. 2023 at P 1; *see* Order No. 2003 at PP 26, 827.

[129] *See* Strata & Sea Breeze Protest at PP 3-4 (third alteration in original).

[130] *Id.*; *see* Strata & Sea Breeze Protest at 1-2.

[131] *See Okla. Gas & Elec. Co. v. FERC*, 11 F.4th 821, 824-25 (D.C. Cir. 2021) (explaining that the Commission cannot grant exceptions or retroactive changes to the filed rate); *Old Dominion Elec. Coop. v. FERC*, 892 F.3d 1223, 1230 (D.C. Cir. 2018) (same); *see also Moscow Dev. Co., LLC*, 187 FERC ¶ 61,040, at P 13 (2024) ("We find that [the Interconnection Customer]'s . . . request for waiver of Schedule 22, section 3.4.1 of the Tariff, which required [Interconnection Customer] to withdraw its interconnection request [by a certain date] to recover the unapplied portion of its initial deposit, is retroactive in nature and is prohibited by the filed rate doctrine."); *Scioto Farms Solar Project, LLC*, 186 FERC ¶ 61,096, at P 25 (2024); *Hecate Grid Clermont 1 LLC*, 183 FERC ¶ 61,011, at P 16 (2023).

required Interconnection Customers participating in the TCS who desired such flexibility to make that election in their TCS Agreement. None of the Complainants made such an election. As a result, it is too late, and a violation of the filed rate doctrine, to grant Complainants a remedy that would allow the Complainants to circumvent the Tariff's interconnection rules. Accordingly, the relief should be denied.

Section 5.1.1.2 of the LGIP afforded Interconnection Customers the opportunity to elect to automatically reduce their Interconnection Requests from CNRIS to NRIS during the TCS, provided they made that election in their TCS Agreement. As explained in ISO's Order No. 2023 compliance filing, this provision, when invoked in advance of the study work avoids a slow-down in the study effort, or a restudy, and so can benefit not only the applicable Interconnection Customer, but also the entire cluster by not changing the identified cost or timing of another customer.[132] Section 5.1.1.2 provided Interconnection Customers the option of being studied for CNRIS and NRIS concurrently, predesignating a service level decrease as a result of potentially adverse results in the CNRIS portion of the study was intended to reduce the risk of later withdrawals and/or restudies.[133] Here, Complainants were on notice of the ISO's rules regarding changes to an Interconnection Customer's requested level of Interconnection Service and failed to follow them. If the

[132] *See, e.g.*, ISO Order No. 2023 Revisions at 40 ("The ISO will implement this proposed provision during the Cluster Study [P]rocess, and anticipates that it will result in a more efficient process that is likely to lead to fewer withdrawals following the Cluster Study.").

[133] *ISO New Eng.*, 191 FERC ¶ 61,018, at P 71 (2025); *see id.* (commenting on proposed section 3.4.2 regarding reduction of Interconnection Service during study, which is identical to that in section 5.1.1.2, RENEW Northeast, Inc. argued that this provision "will save on study work, potentially shorten the timeline, lower the cost of the [C]luster [S]tudy for all parties, and reduce the likelihood of withdrawals that lead to a restudy"); *id.* (commenting on proposed section 3.4.2, which is identical to that in section 5.1.1.2, Clean Energy Associations argued that the optionality provided by this section "is consistent with the intent of Order No. 2023, will help to prevent disruptive withdrawals, allows [I]nterconnection [C]ustomers to respond to information that becomes available through the study process, and will make for a more efficient interconnection process").

business case for the Complainants was such that they could have proceeded with NRIS while avoiding upgrades for CNRIS, the option was available to request precisely that functionality while executing the TCS Agreement.

V. CORRESPONDENCE AND COMMUNICATIONS

Correspondence and communications with respect to this filing should be sent to, and the ISO requests the Secretary to include on the official service list, the following:[134]

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VI. ADMISSIONS AND DENIALS PURSUANT TO 18 C.F.R. § 385.213(C)(2)(I)

Pursuant to Rule 213(c)(2)(i) of the Commission's rules of Practice and Procedure,[135] the ISO's admissions and denials are set forth above in the answer, and, subject to amendment and supplementation, the ISO affirms that any allegation in the Complaint that is not specifically and expressly admitted above is denied.

[134] To the extent necessary, the ISO requests waiver of Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203(b)(3), to permit all of the persons listed to be placed on the official service list for this proceeding.

[135] 18 C.F.R. § 385.213(c)(2)(i).

VII. AFFIRMATIVE DEFENSES PURSUANT TO 18 C.F.R. § 385.213(C)(2)(II)

The ISO's affirmative defenses are set forth above in this answer, and include the following, subject to amendment and supplementation:

1. Moraga Storage, et al., as the Complainants, failed to satisfy their burden of proof under FPA section 206 (16 U.S.C. § 824e) with respect to all claims raised in the Complaint.

2. The Complaint has failed to demonstrate that the ISO violated any Commission order, Tariff, or any other Commission-jurisdictional governing document, or that the ISO administered its Tariff in an unjust, unreasonable, or unduly discriminatory manner.

VIII. CONCLUSION

For the reasons set forth in this answer, the Commission should deny the Complaint.

Respectfully submitted,

/s/ Anna Fernandez

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Counsel for
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October 30, 2026

Attachment A

Affidavit of Mr. Alan McBride,
Vice President of System Planning of ISO New England Inc.

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Moraga Storage, LLC, River Mill Storage, LLC, Hecate Energy Medway Energy Center LLC, Brough Storage, LLC, Partridge Storage, LLC, Complainants,	)	
v.	)	Docket No. EL26-112-000
ISO New England Inc., Respondent.	)	

AFFIDAVIT OF ALAN MCBRIDE
ON BEHALF OF
ISO NEW ENGLAND INC.

I. INTRODUCTION AND QUALIFICATIONS

1. **Q. Please state your name and business address.**

2. A. My name is Alan McBride. My business address is One Sullivan Road, Holyoke, MA 01040.

3. **Q. By whom are you employed and in what capacity?**

4. A. I am employed by ISO New England Inc. ("ISO" or "ISO-NE"). I am currently the Vice President of System Planning.

5. **Q. Please describe your professional background.**

6. A. I joined the ISO in June 2006 and, for the following four years, my primary responsibility was as Project Manager of New Generation Qualification for the Forward Capacity Market ("FCM"). In 2010, I became the Manager, Area Transmission Planning, for northern New England, and continued in that position

until 2015, when I became Director of Transmission Services. In that position, I was responsible for the oversight of the ISO's interconnection process for new Generating Facilities and Elective Transmission Upgrades ("ETUs"). In November 2019, my responsibilities were expanded to include overseeing the qualification of resources in the FCM. On August 1, 2024, I was promoted to Vice President of System Planning. My current responsibilities include oversight of all ISO-NE's planning activities, including area transmission planning, resource adequacy, and interconnection and transmission services.

Before joining the ISO, I worked at Dynegy Inc. ("Dynegy") and then Calpine Corporation. At both companies, I supported various transmission-related activities associated with the development, interconnection, and commercial operation of merchant generation facilities. Prior to joining Dynegy, I worked at Power Technologies Incorporated (now a division of Siemens Industries), where I conducted various transmission analysis studies, including the system impact studies of several proposed generating facilities.

I have 30 years of experience in various aspects of power transmission system analysis and transmission services.

7. **Q. Please describe your educational background.**

8. A. I hold a Bachelor of Science degree in Electrical Engineering from University of College Dublin in Ireland, a Master's degree in Electric Power Engineering from Rensselaer Polytechnic Institute, and a Master of Business Administration degree from Purdue University.

II. PURPOSE OF AFFIDAVIT

9. **Q. What is the purpose of your affidavit?**

10. A. This affidavit supports the ISO's answer to the complaint that Moraga Storage, LLC, et al. ("Complainants") filed with the Federal Energy Regulatory Commission ("Commission") on September 30, 2026, in Docket No. EL26-112-000 ("Complaint"). Specifically, my testimony explains the relevant sections of Schedule 22 of Section II of the ISO's Transmission, Markets, and Services Tariff ("Tariff") and its implementing procedures, including Planning Procedure No. 5-6 ("PP5-6"), and provides additional context and information as necessary to assist in the Commission's consideration of the issues raised in this proceeding. My testimony also describes the transition process, including the conduct and outcomes of the Transitional Cluster Study ("TCS") recently completed as part of that process. I conclude, based on my knowledge and experience in transmission planning, that the Affidavit of Danielle S. Powers and Mark G. Karl in Support of the Project Companies[1] attached to the Complaint fundamentally misunderstands certain aspects of the methodologies used in interconnection studies to meet the interconnection standards in Schedule 22 of the Tariff and cost allocation requirements, and should be given no weight by the Commission.

11. **Q. How is your testimony organized?**

12. A. In my testimony, I first describe the TCS process, including the available Interconnection Services (i.e., Network Resource Interconnection Service

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[1] Complaint of Moraga Storage, LLC, et al. v. ISO New England Inc., Docket No. EL26-112-000, Docket No. EL25-44-000 (Sep. 28, 2026) ("Complaint"); *id.*, Attachment B ("Concentric Affidavit").

("NRIS") and Capacity Network Resource Interconnection Service ("CNRIS")). Next, I explain the applicable study criteria for NRIS and CNRIS and the basis for the additional criteria applicable to CNRIS to assess intra-zonal deliverability. I then explain in more detail the additional criteria used for studying Interconnection Customers seeking CNRIS, which includes the Complainants. I explain how the ISO's pre-project case for studying CNRIS requests is developed and how requests are subsequently added to determine their "but-for" impacts. I also explain why the CNRIS testing relies on linear power flow (direct current or DC) solutions and how the intra-zonal deliverability test can result in impacts on the border or even outside of a designated Load Zone. Lastly, I discuss the drivers of the upgrades in the TCS, including the role that Interconnection Customer's proposed project size and location played in determining those upgrades.

III. THE TRANSITIONAL PROCESS AND THE TCS STUDY

13. **Q. Describe the purpose of the TCS.**

14. A. In Order Nos. 2023 and 2023-A, the Commission adopted significant reforms to its *pro forma* procedures and agreements used to interconnect Large Generating Facilities. The purpose of the reforms was to address interconnection queue delays, backlogs, and inefficiencies and prevent undue discrimination for new technologies. Among other things, the reforms implemented a first-ready, first-served cluster study process that was intended to increase the speed of interconnection queue processing, and a one-time transitional study process to move Interconnection Customers from the then-existing serial study process to the new cluster study process. As relevant here, the Commission required transmission

providers to offer existing Interconnection Customers the ability to participate in a Transitional Cluster Study to complete the identification the upgrades required to interconnect and to inform the development of appropriate Interconnection Agreements. The transition process was specifically designed to avoid late-stage withdrawals and as such, to be used by Interconnection Customers that were far along in their development process and intended to proceed with their proposed Generating Facilities. The Commission made clear that Interconnection Customers that were already in the queue and that wished to avoid the heightened requirements could opt to withdraw their Interconnection Requests without penalty and wait for the first standard cluster study with associated lower deposit and penalty requirements.

15. **Q. What are categories of service that an Interconnection Customer could confirm its request for in the TCS Agreement?**

16. A. Interconnection Customers request in their Interconnection Requests either: NRIS, which is for energy capability only; or CNRIS, which is for energy and capacity capability. Under the transition process incorporated in Schedule 22 of the Tariff, Interconnection Customers that chose to participate in the TCS were afforded another opportunity to elect NRIS or CNRIS and indicate the requested amount of Interconnection Service in the TCS Agreement. All 23 Interconnection Customers that chose to participate in the TCS (the "TCS Projects") requested CNRIS. Accordingly, the proposed TCS Projects would be studied in the TCS to allow for the interconnection of their Generating Facilities to provide both energy and capacity capability.

17. **Q. Please describe the Interconnection Standards that permit an Interconnection Customer to interconnect a Generating Facility seeking NRIS and CNRIS.**

18. Interconnection Customers requesting NRIS must interconnect their Generating Facilities in accordance with the Network Capability Interconnect Standard ("NCIS"),[2] which was previously known in New England as the minimum interconnection standard. Under NCIS, Interconnection Requests are studied under stressed system conditions. If thermal overloads of transmission facilities are identified, existing and earlier-queued Generating Facilities can be dispatched down to attempt to relieve the identified violations. The primary underlying principle of NRIS is that the proposed Generating Facilities will proceed as Network Resources, and reliably participate competitively in the New England Markets, excluding the capacity market, where they may be able to produce and deliver their output where they are lower-priced than other resources under security constrained economic dispatch. In addition to examining the thermal impacts of new proposed Generating Facilities on transmission facilities, NRIS studies also include many other tests, such as voltage, short circuit, stability and electromagnetic transient analysis.

[2] NCIS is defined as "the minimum criteria required to permit Interconnection Customer to interconnect a Generating Facility seeking Network Resource Interconnection Service [("NRIS")]or ETU seeking Network Import Interconnection Service [("NIIS")] in a manner that avoids any significant adverse effect on the reliability, stability, and operability of the New England Transmission System, including protecting against the degradation of transfer capability for interfaces affected by the Generating Facility seeking [NRIS] or ETU seeking [NIIS], as detailed in the ISO New England Planning Procedures." Tariff, Section II, Schedule 22, section 1 (Definitions); *see* PP5-6, section 1.1.1.

Interconnection Customers requesting CNRIS must interconnect their Generating Facilities in accordance with the Capacity Capability Interconnection Standard ("CCIS").[3] Under this standard, Generating Facilities are also studied under stressed system conditions, but the dispatching down of other existing and earlier- or equally-queued Capacity Network Resources ("CNRs") is not allowed. This is because Generating Facilities interconnecting to become CNRs are expected to be able to run and contribute to resource adequacy under a range of stressed conditions.

19. **Q. What study approaches and criteria are applied in the TCS for studying Interconnection Requests for CNRIS?**

20. A. The study approaches and criteria used in studies for both NRIS and CNRIS Interconnection Requests, including the TCS, are detailed in section 3.1 of PP5-6. To facilitate Interconnection Customers' understanding of the approaches and criteria, the ISO also included a detailed explanation of the CNRIS testing methodology in Appendix A to the final TCS Report, which I include as Appendix A here for reference. CNRIS testing focuses on steady-state thermal testing of the impact of proposed Generating Facilities on transmission facilities. For this testing, the 90/10[4] forecast peak load, as documented in the latest ISO Forecast Report of Capacity, Energy, Load and Transmission ("CELT Report") is modeled for the

[3] CCIS is defined as "the criteria required to permit Interconnection Customer to interconnect a Generating Facility seeking [CNRIS] or an ETU seeking Capacity Network Import Interconnection Service in a manner that avoids any significant adverse effect on the reliability, stability, and operability of the New England Transmission System, including protecting against the degradation of transfer capability for interfaces affected by the Generating Facility seeking CNRIS or an ETU seeking Capacity Network Import Interconnection Service, and in a manner that ensures intra-zonal deliverability by avoidance of the redispatch of other CNRs or ETUs with Capacity Network Import Interconnection Service, as detailed in the ISO New England Planning Procedures." Tariff, Section II, Schedule 22, section 1 (Definitions); PP5-6, section 1.1.2.

[4] The 90/10 peak load level is defined as the peak load level that only has a 10% chance of being exceeded.

relevant study year. A peak load level is used because CNRs are expected to be able to contribute to resource adequacy under peak load conditions.

21. **Q. In New England, what other stressed conditions are reflected in CCIS testing?**

22. A. As detailed in section 2.1 of PP5-6, the proposed Generating Facility must not diminish system transfer capability, whether limited by an individual constrained element or a relevant interface, below the level of achievable transfers during reasonably stressed conditions and does not diminish the reliability or operating characteristics of the New England Area bulk power supply system and its component systems. In New England, there are many years of well-established precedent in conducting interconnection testing, including CCIS testing, at the level of achievable transfers for all relevant interfaces. This means that relevant interfaces are modeled at their transfer limits if those transfer levels are achievable with available generation in the case. New England has not used historical, economic, or other data to establish transfer levels for these purposes in part because a given Cluster could add significant amounts of generation that would alter historical flows.

23. **Q. How does the ISO apply the CCIS to Interconnection Requests for CNRIS?**

24. A. First, the ISO develops the base case for a study under section 2.3 of Schedule 22. For the TCS, this involves incorporating all in-service, under construction, and planned transmission and generation projects. Next, the ISO develops the reference case, which involves creating a case that stresses the system at, or very close to 100%, as I described below. The stressing used in CCIS testing

focuses on flowgates. These are monitored transmission elements (which can include voltage or stability limited interfaces) with associated contingencies which result in the worst loadings on those monitored elements. Flowgates are examined to determine how stressed they can be made before the new CNRs under study are added. This process involves the "turning up" and "turning down" of different combinations of generation to simulate different dispatch conditions. Importantly, generation that is off in the base case may be turned on for purposes of this testing. The system will have more CNRs than peak load to provide the reserve margin needed to cover outages and other uncertainties. Therefore, some capacity resources will be off in the base case. However, as CNRs, these generators must be able to run and contribute to resource adequacy under a range of conditions and so can be switched on in the CCIS testing to simulate their impact.

25. **Q. What is the objective of the flowgate stressing process?**

26. A. Stressing these flowgates will identify the existing deliverability of the existing CNR generation on the transmission system, helping to protect against the degradation of transfer capability for interfaces affected by generation under study, consistent with the CCIS definition. Transmission elements are stressed up to their full thermal capability. A flowgate will be brought up-to 100% of the rating capability if that capability exists for the current system. After identifying these existing capability "starting points" the new CNRs under study are turned on to evaluate their incremental impact on the transmission system.

27. **Q. Is this approach of stressing flowgates before turning on new CNRs under study consistent with a "but for" methodology?**

28. A. Yes. This approach is entirely designed with the objective of identifying the "but for" impact of the new generation. The system is simulated up-to the levels of dispatch that are achievable in the pre-project system. These levels of transfer from generation to load are achievable in the pre-project system. This is a level of service that has been arrived at by the combination of the transmission system investments that Transmission Customers have provided over time to ensure the transmission system can reliably serve their load and that existing CNRs (and any associated interconnection upgrades) have constructed to receive the requested levels of CNRIS. Any degradation of these existing capabilities would result in a degradation of the deliverability to load from existing resources. In New England, this as-found capability is referred to as the reference case.

29. **Q. How are the new CNRs under study then turned on using the reference case?**

30. A. New CNRs under study in the cluster is together turned on using the reference case to examine the impact. Only those violations that exceed the impact thresholds specified in PP5-6 are identified as potentially being needed to be addressed by the new generators. Importantly, new CNRs under study are required to address only the incremental impact of their addition. They do not have to make existing generation any "more" deliverable. To explain this further, I refer back to the process of stressing flowgates that I described earlier. If a flowgate was able to be brought to 100% of its capability before turning on the group of the new CNRs under study, then there may have been additional existing generation or upstream

transfers that could have been turned-up further. However, these are not turned up further in the testing in order to not stress the flowgate above its capability in the pre-project reference case. The new generation only has to address its incremental impact; it does not have to upgrade the system any further. This is to ensure that the identified responsibility is only that which would not be needed "but for" the incremental impact of the new CNRs being studied in the cluster.

31. **Q. Do you agree with the arguments in the Complaint regarding the application of the "but for" methodology?**

32. A. No. In the Complaint, the Complainants appear to argue for different approaches to identifying responsibility for upgrades. These proposed alternative approaches would either explicitly or implicitly transfer the responsibility for upgrades from the Interconnection Customers proposing the new Generating Facility causing the incremental impact to load and/or reduce the deliverability of existing generation and system transfer capability. As I explain earlier, the ISO's existing study methodology is a "but for" approach. Importantly, this approach has been in use in the New England region for decades, is captured in New England Planning Procedures that have been developed, reviewed and supported through the New England Power Pool stakeholder process, and should not be changed without an appropriate stakeholder process to discuss these trade-offs.

33. **Q. What power flow solution methodologies are applied in the CCIS testing?**

34. A. CCIS testing relies on linear power flow (DC) solutions to efficiently process several system stress conditions. DC approaches are widely used in the industry and, because of their linear nature, lend themselves to numerous

automated, highly efficient implementations (including ISO's CCIS methodology). To remain linear, DC solutions include an approximation of the reactive power flows on the transmission system. After conducting all required efficient, automated screening and testing that I describe earlier, the ISO performs the final step of validating the final results in alternate current or AC load flow. This produces an exact articulation of the reactive flows on the system and therefore a more accurate value of the megavolt ampere or MVA, which accounts for both real and reactive flows, level that must be achieved by a transmission upgrade. Under this construct, Interconnection Customers will not be required to fund upgrades that are unnecessarily too big, or not big enough to fully accommodate their proposed Generating Facility at the requested level of Interconnection Service.

35. **Q. Do you agree with the Complainants' arguments regarding the application of DC load flow?**

36. A. No. At best, the Complainants make an academic argument. Arguably, in an extreme case, it is possible that an upgrade could be identified under the DC approach that would not be identified under a fully AC approach. However, it is similarly (un)likely that the opposite could occur. All of this is made further unlikely by the thresholds of impact that are applied to the testing. That does not outweigh the benefits and efficiency of the widely-used DC approach, and the ISO does not believe that the less efficient all-AC approach should be pursued.

37. **Q. Is the CCIS an intra-zonal deliverability test?**

38. A. Yes. The Commission required that capacity deliverability testing be intra-zonal.[5] Under the CCIS, Generating Facilities seeking to receive CNRIS in accordance with the CCIS are only assigned responsibility for violations that occur when delivering to the Load Zone.

39. **Q. Does intra-zonal deliverability mean that the redispatch flowgate stressing described above should only focus on generation within the Load Zone?**

40. A. No. As described above, the CCIS is applied under stressed transfer conditions. This means that new CCIS generation under study must be able to deliver to its Load Zone while relevant interfaces are operating at up-to their transfer limits. For example, new generation in western Massachusetts must be deliverable to the western Massachusetts Load Zone under full import transfer levels from New York and/or full import transfer levels to Connecticut. Doing otherwise would result in this new generation degrading these capabilities or not being fully dispatchable under those conditions, and therefore not meeting the CCIS as defined in the Tariff.

41. **Q. Does an intra-zonal standard mean that upgrades can never be identified on the border of a Load Zone or outside of a Load Zone?**

42. A. No. Power does not stop flowing at administrative boundaries. Rather, it flows from power sources to power sinks according to the relative impedance of the connecting transmission facilities. This phenomenon is sometimes known as

[5] *See* Joint Filing of Proposed Revisions to the Generator Interconnection Process and Forward Capacity Market Participation Provisions Set Forth in the ISO New England Inc. Transmission, Markets and Services Tariff, Docket Nos. ER04-432-006, et al., at 14 (Oct. 31, 2008) ("FCM/Queue Amendments"); *ISO New Eng. Inc.*, 126 FERC ¶ 61,080, at P 6 (2009) (noting that deliverability was required to be studied on an intra-zonal basis).

loop-flow and can manifest in affected system impacts near the seams of neighboring systems.

43. **Q. How does ISO identify when impacts must be addressed under the intra-zonal standard?**

44. A. As described in section 3.1 of PP5-6, after identifying any violations using the approach described above, the ISO then conducts a transfer from the new CNRs under study to the Load Zone load and only identifies upgrade responsibility in the cases where the proportional impact, i.e., distribution factor ("DFAX"), is above the threshold specified in the procedure. It is certainly possible for CNRs under study to overload a transmission facility in a neighboring zone, or a facility on the border of its zone, while delivering to its own Load Zone, and, in those cases, the CNRs under study should be responsible for those upgrades. When generation is injected onto the system, the megawatt output will flow over the connecting transmission facilities to be delivered to the load that is withdrawing power from the system. This transfer will be dispersed over the transmission facilities according to their relative impedances. Some power can and will flow over lines that border the Load Zone, or are in neighboring Load Zones while this transfer is taking place. This is confirmed by identifying the proportional impact (i.e., DFAX) of the new CNRs under study on the flowgate's transmission facility while simulating a transfer from the new CNRs under study to the load in the Load Zone. This confirmation ensures that a violation requiring a Network Upgrade is only associated with new CNRs under study when the violation results from a sufficient impact of power flow from that generator to the Load Zone, and not to the system at large.

45. **Q. Did the ISO change the CCIS testing approach before conducting the TCS?**

46. A. No. The CCIS testing has remained largely unchanged since it was developed almost twenty years ago.[6]

47. **Q. Was the CCIS conducted previously in a purely serial manner?**

48. A. No. Before the adoption of the Order No. 2023[7] reforms, CCIS testing was conducted in a CNR Group Study (a form of cluster study) as part of the qualification preparation for each Forward Capacity Auction.[8]

49. **Q. How was the CCIS implemented in the CNR Group Study?**

50. A. All of the Interconnection Requests for Generating Facilities seeking CNRIS that submitted Show of Interest applications to participate in the same Forward Capacity Auction were added to the reference case, in a manner with a similar end result to the description I provided above for the TCS. In the CNR Group study, instead of using the shared proportional impact approach required under Order No. 2023, cost responsibility for upgrades was identified in serial queue order. This was based on the individual incremental impact of each proposed Generating Facility in the Interconnection Requests. Accordingly, the latest-queued Interconnection Request was assessed responsibility for incremental impacts with all of the earlier-queued Interconnection Requests running in that

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[6] *See supra* note 5 (FCM/Queue Amendments).

[7] *Improvements to Generator Interconnection Procedures and Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *limited order on reh'g*, 185 FERC ¶ 61,063 (2023), *order on reh'g & clarification*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024), *petitions for review denied sub nom. Advanced Energy United v. FERC*, 185 F.4th 186 (D.C. Cir. 2026).

[8] *See* FCM/Queue Amendments at 15.

case. As such, the final level of stress for the overall group was similar to the levels of cumulative stress identified in the TCS

51. **Q. What were the drivers of the extent of the upgrades identified in the TCS?**

52. A. First and foremost, the identification of upgrades is driven by the locations and sizes of the proposed Generating Facilities included in a cluster, and, in particular portions of the system, the accumulations thereof. As I discuss below, the TCS Projects identified in their Interconnection Requests (and, subsequently, in the TCS Agreements) Points of Interconnection and requested levels of Interconnection Service that drove the identified upgrades. There are alternative locations on the New England Administered Transmission System where well-sized Generating Facilities would have been able to proceed with few or no Network Upgrades. In fact, the Complainants themselves acknowledge that several TCS Projects did not have significant capacity interconnection upgrades.

53. **Q. Were there particular circumstances associated with the TCS Projects?**

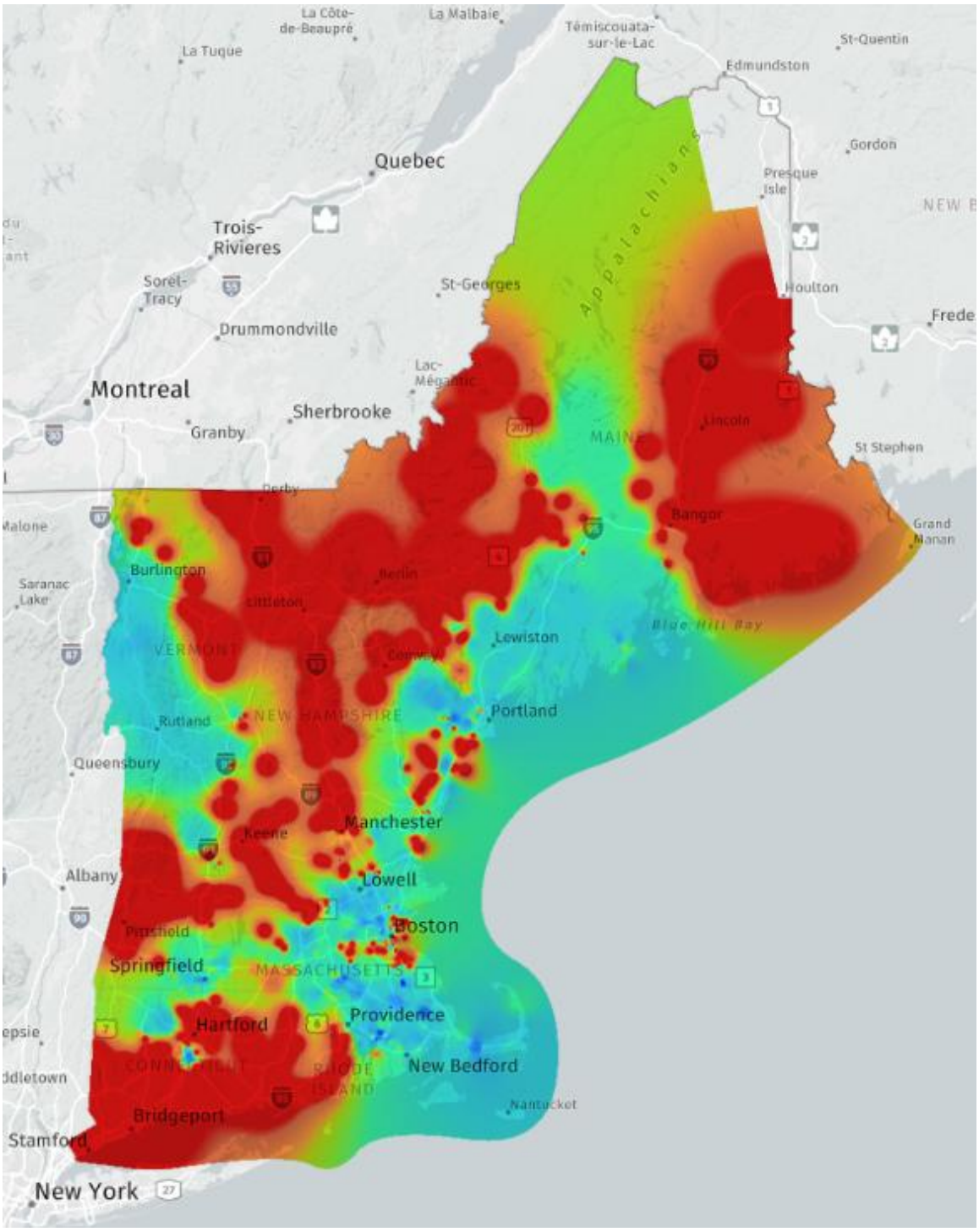
54. A. Of the 23 projects studied in the TCS, 17 were located in Massachusetts, some of which, because of their location and lack of accumulation with other projects, were found responsible for comparably few upgrades. There were no proposed projects in Rhode Island. There was one project in Connecticut that had very limited upgrades. There were two projects in Vermont and two in Maine that had also very limited upgrades.

55. **Q. What caused the high levels of upgrades for some of the Massachusetts-based TCS Projects?**

56. A. The size and location of the Massachusetts-based TCS Projects (which includes Complainants' projects) resulted in accumulations of projects in portions of the system with limited or no remaining headroom. In particular, the TCS Projects included was a group of Generating Facilities seeking to interconnect in the western Massachusetts portion of the system that needed to respect import capability from New York, as well as existing internal generation and transfer capabilities. In addition, there was a group of proposed Generating Facilities to the north and west of Boston that interacted with certain transmission facilities that become heavily loaded under high load conditions.

57. **Q. What was the status of the headroom that existed in the system prior to the TCS?**

58. A. The following graphic, produced using the ISO's new heatmap tool, which the ISO developed in the response to Order No. 2023, represents a simulation of potential deliverability throughout the system with redder areas representing areas with low capacity or severe constraints and greener/teal areas representing areas with higher availability of capacity. As the graphic illustrates, the areas in red, which include the locations of many of the projects that participated in the TCS, had very little headroom prior to the start of the TCS.



59. **Q. Can you explain, in general terms, why the system lacked headroom prior to the TCS?**

60. A. The New England region made significant transmission investments during the 2010s; approximately $8 billion was invested in regional projects from 2010

through 2020.[9] While these investments were developed to meet reliability needs, in some cases, these transmission investments resulted in some headroom to the system. Over the course of that decade, and into the 2020s, the addition of new Generating Facilities, including more than 8,000 megawatts ("MW") of new deliverable generation capacity via the Forward Capacity Market,[10] and the addition of approximately 8,200 MW of distributed energy resources across the region, 4,200 MW of which is located in Massachusetts,[11] resulted in much headroom being used up. The addition of these resources and transmission investments has been a success, but has resulted in a system that looks significantly different from 2018 and even from 2023 when the Commission issued Order No. 2023.

While the graphic representation of this lack of headroom is a product of the ISO's new heatmap tool, the drivers were well known to stakeholders prior to the TCS. Transmission investment developed under the Regional System Planning Process peaked in 2017, and is projected at lower levels in the coming years. The addition of new Generating Capacity Resources and distributed energy resources were also tracked and presented to stakeholders by the ISO both at stakeholder committees and the CELT Report. The ISO also regularly conducts and publishes

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[9] *See Transmission*, ISO New England Inc., https://www.iso-ne.com/about/key-stats/transmission [https://perma.cc/59FY-RLX4] (last visited Oct. 29, 2026) (displaying future annual investment that includes projects under construction, planned, and proposed in the 'Annual Investment in Transmission to Maintain Reliability' chart).

[10] *See Markets: Results of Annual Forward Capacity Auctions*, ISO New England Inc., https://www.iso-ne.com/about/key-stats/markets#fcaresults [https://perma.cc/6VLD-9ALH] (last visited Oct. 29, 2026).

[11] *See 2026 Final DER Forecast*, ISO New England Inc. (Apr. 30, 2026), https://www.iso-ne.com/static-assets/documents/100034/2026_final_der_forecast.pdf [https://perma.cc/F3A5-ZKWC].

other planning studies that evaluate whether system upgrades are required in the near- and long-term, and these studies include details regarding system topography and changes. Taken together, all of these sources would have demonstrated that system headroom was limited prior to the TCS.

61. **Q. Do the findings of the TCS mean that there is no opportunity to add new Generating Facilities in New England without significant upgrades?**

62. A. No. There are opportunities to add well-sized new Generating Facilities in parts of Massachusetts and outside of Massachusetts. This is evidenced by the results for some of the projects in the TCS itself, and illustrated by the heatmap tool shown above.

IV. CONCLUSION

63. **Q. Does this conclude your affidavit?**

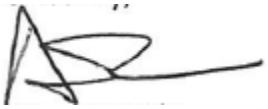
64. A. Yes.

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Moraga Storage, LLC, River Mill Storage, LLC, Hecate Energy Medway Energy Center LLC, Brough Storage, LLC, Partridge Storage, LLC, Complainants,	)	
v.	)	Docket No. EL26-112-000
ISO New England Inc., Respondent.	)	

VERIFICATION OF ALAN MCBRIDE

Pursuant to 28 U.S.C. § 1746, I, Alan McBride, Vice President of System Planning at ISO New England Inc., affirm under penalty of perjury that the foregoing affidavit and exhibits were prepared by me or at my direction and are true and correct to the best of my knowledge, information, and belief.



Alan McBride

Dated: October 30, 2026

Appendix A

Copy of ISO New England, Inc., Transitional Cluster Study – Final Report, Appendix A, Capacity Capability Interconnection Standard (CCIS) Study Methodology

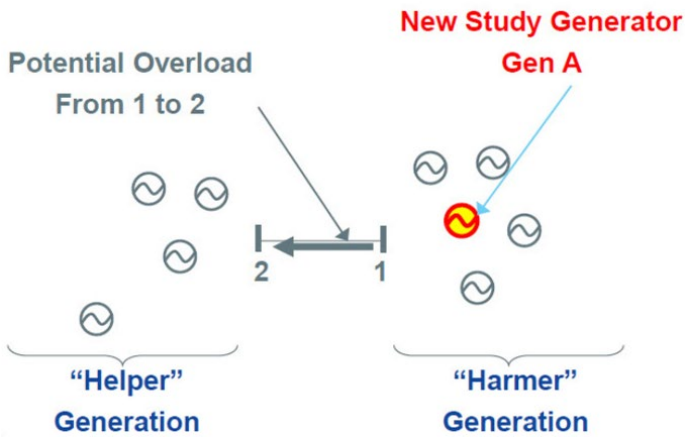
Capacity Capability Interconnection Standard (CCIS) Study Methodology

The CCIS analysis is performed by following the steps described below, in accordance with Section 3 of PP5-6. It relies on linear power flow (DC) solutions to efficiently process several system stress conditions, where final results are verified through AC power flow solutions. This summary applies to the CCIS analysis performed for Cluster Studies, and specifically for the Transitional Cluster Study (TCS), but is fundamentally the same methodology used in past deliverability analyses to support Forward Capacity Auctions.

Step 1 – Initial Stress – Starting with the initial base case, developed consistent with Section 2.3 of Schedules 22 and 23, system stress cases are developed by stressing flows across key interfaces (North-South, West-East, NY-NE, etc.). Each stress case is N-1 secured.

Step 2 – Flowgate Screen – Using the secured case(s) and ancillary files, monitored elements and contingency pairs (flowgates) are identified, which have the potential to reach significant loading under stressed conditions. This flowgate screening process is achieved in the form of a transfer analysis. For each flowgate, the screening sorts all generators, including the TCS projects, from highest to lowest DFAX on the flowgate with respect to the New England system load. Generators with a positive DFAX value are referred to as "harmers," meaning those for which increasing output increases loading on the monitored element for the given contingency. Generators with a negative DFAX are referred to as "helpers," meaning those for which increasing output reduces flow on the monitored element for the given contingency. A transfer is performed from the worst harmers to the best helpers until the flowgate reaches specified screening thresholds (*e.g.*, a loading of 80% of its applicable rating). This list of flowgates is saved to a flowgate file for use in the subsequent steps.

Figure 1 - Harmers and Helpers Illustration



Step 3 – **Reference Dispatch –** The next step in the analysis is performed by stressing flowgates for which the TCS Project(s) under study is a (are) significant harmer(s). To determine the applicable stress flowgates, the TCS Project(s) under study must either have a DFAX of at least 3% with respect to New England system load or an impact of at least 3% on the flowgate as a percent of its applicable rating. A pre-project dispatch (also referred to as the reference dispatch) is created by completing a transfer from harmer generation[1] with a DFAX of 3% or greater to generators with a DFAX less than 3% on the stress flowgate with respect to New England system load. Each harmer is dispatched (even if initially offline) up to its full output,[2] one at a time, in descending DFAX order (highest to lowest). The set of generators with DFAX less than 3% are turned down proportionally based on their output before the dispatch. The pre-project dispatch stops when one of the flowgates, for which the TCS Project(s) under study is a (are) significant harmer(s) is binding (*i.e.*, reaches 100% of its applicable rating), or when a voltage/stability-limited interface is binding, or when there are no additional harmers with DFAX 3% or greater available to dispatch. A subset of flowgates (monitored flowgates), for which the TCS project(s) under study is a (are) significant harmer(s) that have a potential for being overloaded are identified at this time. A TCS Project is considered a "TCS Project under study" if:

- with respect to the stress flowgate, it has a DFAX greater than or equal to 3% with respect to the New England system load; and
- with respect to the monitored flowgates, it would meet the criteria to be considered impactful for the applicable Load Zone (*i.e.*, it meets the 3% Load Zone DFAX criteria as listed in Section 3.1.1 of PP5-6).

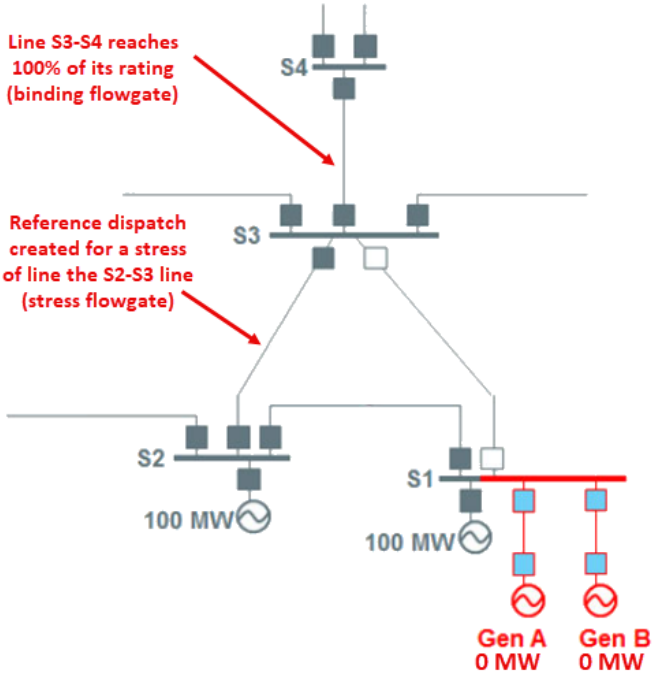
Notes:

i. TCS Project(s) under study is (are) not dispatched in the reference dispatch
ii. Certain harmers or helpers may not be dispatched if doing so causes a violation of a voltage/stability-limited interface.
iii. Thermal-limited interfaces are monitored only if they form the boundary of the Load Zone for the TCS project(s) under study.
iv. The stress flowgate and binding flowgate may be different in a given dispatch.

[1] May include TCS projects provided they are not considered a TCS Project under study for that dispatch.

[2] Summer CNRC

Figure 2 - Reference Dispatch Illustration



Step 4 – Study Dispatch – A post-project dispatch (also referred to as study dispatch) is created by fully dispatching the TCS Project(s) under study and completing a transfer from the TCS Project(s) under study to generators with DFAX below 3% on the stress flowgate with respect to the New England system load. Each individual dispatch is reviewed to ensure that no key interface limits are exceeded for interfaces that form the boundary with the Load Zone under consideration, or voltage or stability limited interfaces that are completely outside of the Load Zone under consideration. Violations observed in this dispatch, for which the TCS Project(s) under study has a DFAX greater than 3% on the overloaded flowgate with respect to the Load Zone load (*i.e.*, meet the DFAX criteria in PP5-6 Section 3.1.1), are recorded for further review.

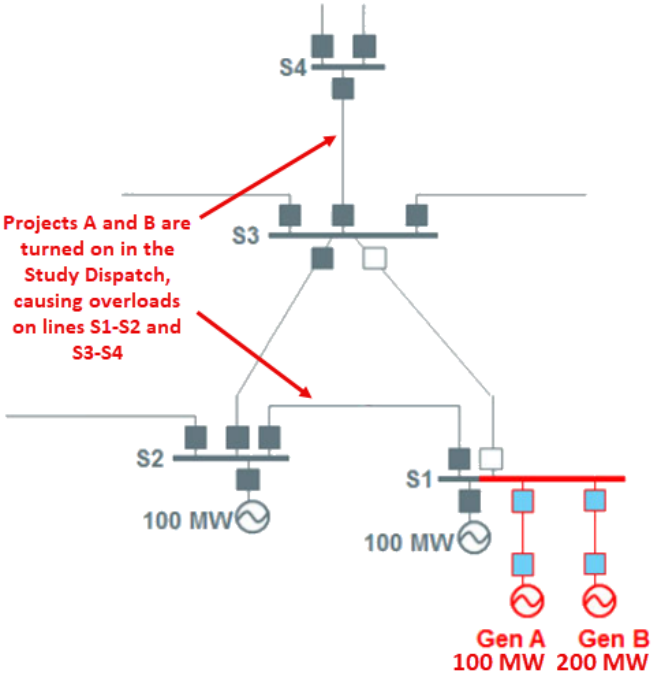
Notes:

i. Ultimately, the TCS Project(s) under study included in the post-project dispatch must have:
   a. DFAX greater than or equal to 3% on the stress flowgate with respect to the New England system load; and
   b. DFAX greater than, or equal to, 3% with respect to its Load Zone load on a monitored flowgate (*i.e.*, meets the DFAX criteria in PP5-6 Section 3.1.1).

ii. A violation may be associated with a monitored flowgate, or a stability- or voltage-limited interface within the Load Zone under consideration.

iii. Steps 3 and 4 use DFAX values calculated with Load Zone load as the reference subsystem only to determine which TCS project(s) is (are) associated with an observed overload and the DFAX values to use in cost allocation calculations.

Figure 3 - Study Dispatch Illustration



Step 5 – Recorded violations from Step 4 are verified in an AC power flow solution and used as the basis for any identified upgrades if they meet the overload criteria as noted in Section 3.1.1 of PP5-6 (i.e., the overloads recorded in the final TCS Report are AC verified values). All power flows performed in the previous steps use a DC power flow solution.

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 this proceeding.

Dated at Washington, D.C., this 30th day of October 2026.

/s/ Abraham F. Johns III
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Attorney for
ISO New England Inc.