

183 FERC ¶ 61,180  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Willie L. Phillips, Acting Chairman;  
James P. Danly, Allison Clements,  
and Mark C. Christie.

ISO New England Inc.

Docket No. ER22-2357-000

ORDER ON COMPLIANCE FILING

(Issued June 15, 2023)

1. On July 12, 2022, ISO New England Inc. (ISO-NE), the PTO Administrative Committee (PTO AC) on behalf of the Participating Transmission Owners (PTO),<sup>1</sup> and Cross-Sound Cable, LLC (CSC, LLC) (jointly, Filing Parties) submitted proposed revisions to the ISO-NE Transmission, Markets and Services Tariff (Tariff), specifically section II in compliance with the requirements of Order No. 881,<sup>2</sup> a final rule that revised both the *pro forma* Open Access Transmission Tariff (OATT) and the Commission's regulations under section 206 of the Federal Power Act (FPA)<sup>3</sup> to improve the accuracy and transparency of electric transmission line ratings.<sup>4</sup> In this order, we accept Filing

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<sup>1</sup> Certain of the PTOs are transmission providers providing local service over non-pool transmission facilities on an open-access basis under Schedule 21 of the ISO-NE OATT. Pursuant to the terms of the TOA among the PTOs and ISO-NE, the PTOs own, physically operate and maintain transmission facilities in New England and ISO-NE has operating authority over all of the transmission facilities of the PTOs, including those used to provide service under Schedule 21. Filing, Transmittal Letter at 3-4.

<sup>2</sup> *Managing Transmission Line Ratings*, Order No. 881, 177 FERC ¶ 61,179 (2021), *order addressing arguments raised on reh'g*, Order No. 881-A, 179 FERC ¶ 61,125 (2022).

<sup>3</sup> 16 U.S.C. § 824e.

<sup>4</sup> A transmission line rating is the

[m]aximum transfer capability of a transmission line, computed in accordance with a written Transmission Line Rating methodology and consistent with Good Utility Practice, considering the technical limitations on conductors and relevant transmission equipment (such as thermal flow

Parties' compliance filing, to become effective to be effective July 12, 2025, subject to further compliance.

## I. Background

2. In Order No. 881, the Commission found that, because of the relationship between transmission line ratings and wholesale rates, inaccurate transmission line ratings cause the rates for the transmission of electric energy in interstate commerce and the sale of electric energy at wholesale in interstate commerce to be unjust and unreasonable.<sup>5</sup> To ensure just and reasonable wholesale rates that more accurately reflect the cost of the wholesale service being provided (i.e., energy, capacity, ancillary services, or transmission service), the Commission adopted reforms that impose certain obligations on transmission providers<sup>6</sup> and public utility transmission owners with respect to transmission line ratings.<sup>7</sup>

3. In Order No. 881, the Commission required: (1) transmission providers to implement ambient-adjusted ratings (AAR)<sup>8</sup> for near-term transmission service requests

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limits), as well as technical limitations of the Transmission System (such as system voltage and stability limits).

Relevant transmission equipment may include, but is not limited to, circuit breakers, line traps, and transformers.

*Pro forma* OATT, attach. M, Definitions; *see also* Order No. 881, 177 FERC ¶ 61,179 at PP 1, 44.

<sup>5</sup> Order No. 881, 177 FERC ¶ 61,179 at PP 3, 29-30.

<sup>6</sup> In this order, we use transmission provider to mean any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce. 18 C.F.R. § 37.3 (2022). Therefore, unless otherwise noted, "transmission provider" refers only to public utility transmission providers. Furthermore, the term "public utility" as found in section 201(e) of the FPA means "any person who owns or operates facilities subject to the jurisdiction of the Commission under this subchapter . . ." 16 U.S.C. § 824(e).

<sup>7</sup> Order No. 881, 177 FERC ¶ 61,179 at P 29.

<sup>8</sup> An AAR is a:

Transmission Line Rating that: (a) [a]pplies to a time period of not greater than one hour[;] (b) [r]eflects an up-to-date forecast of ambient air temperature across the time period to which the rating applies[;] (c) [r]eflects the absence of solar heating during

on the transmission lines over which they provide transmission service; (2) transmission providers to implement seasonal line ratings<sup>9</sup> for longer-term transmission service requests on the transmission lines over which they provide transmission service; (3) regional transmission organizations and independent system operators (RTO/ISO) to establish and implement the systems and procedures necessary to allow transmission owners to electronically update transmission line ratings at least hourly;<sup>10</sup> (4) transmission providers to use uniquely determined<sup>11</sup> emergency ratings;<sup>12</sup> (5) public

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nighttime periods, where the local sunrise/sunset times used to determine daytime and nighttime periods are updated at least monthly, if not more frequently[; and] (d) [i]s calculated at least each hour, if not more frequently.

*Pro forma* OATT, attach. M, Definitions; *see also* Order No. 881, 177 FERC ¶ 61,179 at P 4.

<sup>9</sup> A seasonal line rating is a:

Transmission Line Rating that: (a) [a]pplies to a specified season, where seasons are defined by the Transmission Provider to include not fewer than four seasons in each year, and to reasonably reflect portions of the year where expected high temperatures are relatively consistent[;] (b) [r]eflects an up-to-date forecast of ambient air temperature across the relevant season over which the rating applies[; and] (c) [i]s calculated annually, if not more frequently, for each season in the future for which Transmission Service can be requested.

*Pro forma* OATT, attach. M, Definitions; *see also* Order No. 881, 177 FERC ¶ 61,179 at P 204.

<sup>10</sup> Order No. 881, 177 FERC ¶ 61,179 at P 255.

<sup>11</sup> “Uniquely determined” means that the transmission line ratings are determined based on assumptions that reflect the specific, finite duration of emergency ratings, as opposed to using assumptions used to calculate normal ratings. The Commission explained that, by requiring emergency ratings be uniquely determined, they would be based on assumptions that reflect the finite duration of the emergency ratings, as distinct from the assumptions of normal ratings that can be maintained indefinitely. Order No. 881, 177 FERC ¶ 61,179 at PP 294-295.

<sup>12</sup> An emergency rating is “a Transmission Line Rating that reflects operation for a specified, finite period, rather than reflecting continuous operation. An Emergency Rating may assume an acceptable loss of equipment life or other physical or safety

utility transmission owners to share their transmission line ratings and transmission line rating methodologies with their respective transmission provider(s) and with market monitors in RTOs/ISOs; (6) transmission providers to share their transmission owners' transmission line ratings and transmission line rating methodologies with any transmission provider(s) upon request; (7) transmission providers to maintain a database of their transmission owners' transmission line ratings and transmission line rating methodologies on the transmission provider's Open Access Same-Time Information System (OASIS) site or another password-protected website; and (8) transmission providers to post on OASIS or another password-protected website any uses of exceptions or temporary alternate ratings.<sup>13</sup> In addition, the Commission required transmission providers to explain their timelines for calculating or submitting AARs as part of their compliance filings.<sup>14</sup>

## II. Compliance Filing

4. ISO-NE proposes to add a new Attachment Q to its Tariff for regional network service.<sup>15</sup> ISO-NE states that the new Attachment Q closely mirrors, with minor adjustments, the *pro forma* OATT Attachment M. ISO-NE asserts that its requested adjustments to Order No. 881's *pro forma* OATT Attachment M are consistent with Order No. 881 and are consistent with the transmission service and market constructs in New England. ISO-NE states that Attachment Q by its own terms will become applicable in July 2025.<sup>16</sup>

5. PTO Administrative Committee (AC), on behalf of the PTOs, proposes modifications to Schedule 21-Common of the ISO-NE Tariff to include a new Attachment M that incorporates tariff language based on the *pro forma* Attachment M adopted by the Commission in Order No. 881 with targeted modifications.<sup>17</sup> PTO AC states that references have been added to Attachment M in Schedule 21-Common to reflect that the transmission service provided pursuant to Schedule 21 is local in nature,

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limitations for the equipment involved." *Pro forma* OATT, attach. M, Definitions; *see also* Order No. 881, 177 FERC ¶ 61,179 at P 293.

<sup>13</sup> Order No. 881, 177 FERC ¶ 61,179 at PP 4-11.

<sup>14</sup> *Id.* P 143.

<sup>15</sup> Filing, Transmittal Letter at 11.

<sup>16</sup> *Id.* at 18-19.

<sup>17</sup> *Id.* at 16-17.

that this local service encompasses both Local Network Service and Local Point-to-Point Service, and that the transmission lines for which the PTOs will provide transmission line ratings for purposes of compliance with Order No. 881 under Schedule 21 are non-pool transmission facilities. PTO AC also proposes language clarifying that the PTOs will be responsible for calculating and communicating AARs and Emergency Local Ratings to ISO-NE, as well as calculating and providing Seasonal Local Line Ratings. Finally, the PTO-AC proposes to adopt certain wording changes included in Attachment Q as more consistent with the ISO-NE Tariff.

6. Finally, CSC LLC, owner of the Cross-Sound Cable, proposes modifications to Schedule 18<sup>18</sup> of the ISO-NE Tariff to clarify that the Cross-Sound Cable's Available Transfer Capability calculation on OASIS is not subject to ambient air adjustment under Attachment Q, although CSC LLC posts – and will continue to post – its Available Transfer Capability calculation on its OASIS.<sup>19</sup>

7. Filing Parties request an effective date of September 10, 2022 effective date for their compliance filing, or any subsequent date that the Commission shall so designate.<sup>20</sup>

### **III. Notice of Filing and Responsive Pleadings**

8. Notice of ISO-NE's filing was published in the *Federal Register*, 87 Fed. Reg. 42,717 (July 18, 2022), with interventions and protests due on or before August 2, 2022. Eversource Energy Service Company, Narragansett Electric Company, and National Grid filed timely motions to intervene.

### **IV. Discussion**

#### **A. Procedural Matters**

9. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2022), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

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<sup>18</sup> The proposed modifications to Schedule 18 add a single provision to the schedule and do not include a separate *pro forma* Attachment M.

<sup>19</sup> Filing, Transmittal Letter at 17-18.

<sup>20</sup> *Id.* at 18-19.

**B. Substantive Matters**

10. As discussed below, we find that ISO-NE’s proposal in Attachment Q and PTO AC’s proposal in Attachment M both partially comply with the requirements of Order No. 881. Accordingly, we accept Filing Parties’ filing to be effective July 12, 2025, subject to further compliance, as discussed below.<sup>21</sup>

11. As an initial matter, we find that ISO-NE’s proposed tariff language in Attachments Q and PTO AC’s proposed tariff language in Attachment M comply with the following requirements of Order No. 881: (1) transmission providers must implement seasonal line ratings for longer-term transmission service requests on the transmission lines over which they provide transmission service; (2) transmission providers must use uniquely determined emergency ratings; (3) public utility transmission owners must share their transmission line ratings and transmission line rating methodologies with their respective transmission provider(s) and with market monitors in RTOs/ISOs; and (4) transmission providers must share their transmission owners’ transmission line ratings and transmission line rating methodologies with any transmission provider(s) upon request.<sup>22</sup> We address each of the remaining issues below.

**1. Ambient-Adjusted Ratings****a. Use of AARs For Near-term Transmission Service**

12. In Order No. 881, the Commission required transmission providers to use AARs when evaluating the availability of and requests for near-term transmission service<sup>23</sup> (under sections 15, 17, 18, and 29 of the *pro forma* OATT). Specifically, the Commission required transmission providers to use AARs as the relevant transmission line ratings when: (1) evaluating requests for near-term transmission service, defined as transmission service ending within 10 days of the date of the request; (2) responding to requests for information on the availability of potential near-term transmission service (including requests for available transfer capability (ATC) or other information related to

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<sup>21</sup> ISO-NE should submit its compliance filing in an eTariff submittal using Type of Filing Code 80 – Compliance Filing in the above referenced docket.

<sup>22</sup> Proposed ISO-NE Tariff, attach. Q (Transmission Line Ratings) (0.0.0).

<sup>23</sup> The Commission defined “requests for near-term transmission service” to include not only requests for near-term point-to-point transmission service, but also network resource designations and secondary service where the start and end date of the designation/request is within the next 10 days. Order No. 881, 177 FERC ¶ 61,179 at P 86.

potential service); and (3) posting ATC or other information related to near-term transmission service to their OASIS site.<sup>24</sup>

13. Further, the Commission required transmission providers to use AARs as the relevant transmission line rating when determining whether to curtail or interrupt near-term point-to-point transmission service (under sections 13.6 and/or 14.7 of the *pro forma* OATT) if such curtailment or interruption is both necessary because of issues related to flow limits on transmission lines and anticipated to occur (start and end) within 10 days of such determination.<sup>25</sup> Similarly, the Commission required transmission providers to use AARs as the relevant transmission line ratings when determining whether to curtail network or secondary service (under section 33 of the *pro forma* OATT) or redispatch network or secondary service (under sections 30.5 and/or 33 of the *pro forma* OATT), if such curtailment or redispatch is both necessary because of issues related to flow limits on transmission lines and anticipated to occur (start and end) within 10 days of such determination.<sup>26</sup> The Commission further clarified that AARs must be used as the relevant transmission line rating when determining whether to initiate Transmission Loading Relief (TLR) procedures anticipated to occur (start and end) within the next 10 days.<sup>27</sup>

14. The Commission required that transmission providers – including RTOs/ISOs for transmission service at their seams – use AARs as the basis for evaluation of transmission service requests that will end within 10 days of the request.<sup>28</sup> The Commission stated that it would allow RTOs/ISOs to comply with these AAR requirements by revising their OATTs to require implementation of AARs within their security constrained economic dispatch and security constrained unit commitment models (and in any relevant related models) in both the day-ahead and real-time markets and reliability unit commitment processes,<sup>29</sup> and any other intra-day reliability unit commitment processes.<sup>30</sup> The Commission stated that, to the extent an RTO/ISO believes that AARs should not be used

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<sup>24</sup> Order No. 881, 177 FERC ¶ 61,179 at P 86.

<sup>25</sup> *Id.* P 87.

<sup>26</sup> *Id.* P 88.

<sup>27</sup> *Id.* P 177.

<sup>28</sup> *Id.* P 4.

<sup>29</sup> *Id.* P 89.

<sup>30</sup> See *id.* P 89 n.213 (explaining the meaning of reliability unit commitment for purposes of the Final Rule).

as part of any market process associated with the day-ahead and real-time markets (or that updated AARs should not be required for any market process), it should propose and justify such deviations on compliance.<sup>31</sup> However, the Commission further noted that RTOs/ISOs generally use the *pro forma* OATT transmission service model for movement of electricity into/out of their service territories.<sup>32</sup> Thus, the Commission required that, for transmission service at their seams, RTOs/ISOs must use AARs as the basis for evaluation of transmission service requests that will end within 10 days of the request, and as the basis for the determination of the necessity of curtailment, interruption, or redispatch of transmission service anticipated to occur within those 10 days.<sup>33</sup>

i. **ISO-NE Proposal**

15. ISO-NE, in its proposed Attachment Q, proposes to use AARs as provided by the PTOs in its Day-Ahead and Real-Time Energy Markets.<sup>34</sup> With respect to the use of AARs at its seams, ISO-NE notes that it calculates ATC for the interfaces with New York under the process in Attachment C – Available Transfer Capability Methodology to the ISO-NE Tariff. ISO-NE adds that it has begun discussions with NYISO about how transmission line ratings, including AARs, for the equipment that makes up the New York/New England interfaces will be coordinated under Order No. 881, but that no changes are proposed to Attachment C at this time.<sup>35</sup>

16. ISO-NE proposes to modify the *pro forma* language in its Attachment Q to be consistent with the transmission service and market constructs in New England, including the removal of the Commission adopted definition of “Near Term Transmission Service” and the requirements related to the use of AARs in evaluating requests for such service.<sup>36</sup> ISO-NE explains that, because it does not offer firm transmission service over the pool transmission facilities, the use of AARs within the New England markets will be

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<sup>31</sup> *Id.* P 153.

<sup>32</sup> *Id.* P 134.

<sup>33</sup> *Id.* PP 4, 89.

<sup>34</sup> Filing, Transmittal Letter at 13 (citing Proposed ISO-NE Tariff, attach. Q. (“ISO shall use AARs in the security- constrained unit commitment, security constrained economic dispatch, and related models, as well as for Day-Ahead Energy Market and Real-Time Energy Market operations and clearing.”)).

<sup>35</sup> *Id.* at 13.

<sup>36</sup> *Id.* at 11.

confined to use in the Day-Ahead and Real-Time Energy Markets and unit commitment processes.

## ii. Commission Determination

17. We find that ISO-NE's proposed Attachment Q partially complies with the requirements of Order No. 881 for use of AARs in near-term transmission service. Specifically, we find that ISO-NE's proposed Attachment Q complies with the Commission's requirements because ISO-NE proposes to apply AARs on its Day-Ahead and Real-Time Energy Markets and Real-Time operations. As the Commission noted in Order No. 881, transmission providers could comply with these requirements by incorporating AARs in their Day-Ahead and Real-Time markets.<sup>37</sup> Accordingly, we accept the addition to Attachment Q specifying the use of AARs, and, if unavailable, Seasonal Line Ratings, in the security-constrained unit commitment, security constrained economic dispatch, and related models, as well as for Day-Ahead Energy Market and Real-Time Energy Market operations and clearing.

18. However, it is unclear whether ISO-NE will use AARs as the basis for near-term transmission service at its seams. ISO-NE states that it calculates ATC for the interfaces with New York under its existing Tariff. However, ISO-NE does not make it clear whether its existing Tariff uses AARs as the basis for near-term transmission service at its seams.<sup>38</sup> Accordingly, we direct ISO-NE to file, within 60 days of the date of this order, a further compliance filing to revise the ISO-NE Tariff to specify that transmission service at ISO-NE's seams use AARs as the basis for evaluation for near-term transmission service requests, or explain why it should not be required to do so.<sup>39</sup>

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<sup>37</sup> Order No. 881, 177 FERC ¶ 61,179 at PP 4, 89 (“[W]e adopt and modify the proposal in the NOPR to allow RTOs/ISOs to comply with the final rule’s AAR requirements by revising their OATTs to require implementation of AARs within their security constrained economic dispatch (SCED) and security constrained unit commitment (SCUC) models … in both the day-ahead and real-time markets and reliability unit commitment (RUC) processes, and any other intra-day RUC processes.”)

<sup>38</sup> Filing, Transmittal Letter at 13.

<sup>39</sup> Order No. 881, 177 FERC ¶ 61,179 at PP 88 (“[W]e adopt the proposal in the NOPR to require that transmission providers use AARs as the relevant transmission line ratings when determining whether to curtail network or secondary … or redispatch network or secondary service … if such curtailment or redispatch is both necessary because of issues related to flow limits on transmission lines and anticipated to occur (start and end) within 10 days of such determination.”).

**iii. PTO AC Proposal**

19. PTO AC's proposed Attachment M, which covers local service within New England markets, adopts the *pro forma* language in Attachment M, with minor revisions, including the addition of language clarifying that the PTOs will be responsible for calculating and communicating AARs and Emergency Local Ratings to ISO-NE, as well as calculating and providing Seasonal Local Line Ratings.<sup>40</sup>

**iv. Commission Determination**

20. We find that PTO AC's proposal complies with the requirement in Order No. 881 to apply AARs on all transmission lines. Specifically, we find that PTO AC's proposed Attachment M is consistent with or superior to the Commission's requirements because PTO AC proposes to apply AARs on its Local Point-to-Point or Local Network Service, which constitute all transmission service provided by PTO AC. Accordingly, we accept PTO AC's proposal.

21. We also find that PTO AC's proposed Attachment M complies with the requirement in Order No. 881 for use of AARs in near-term transmission service. Specifically, we find that PTO AC adopts the *pro forma* language with minor adjustments to reflect terms unique to ISO-NE. Accordingly, we accept PTO AC's proposed revisions.

**2. AAR Timelines**

22. In discussing how new forecast data should be incorporated into AAR calculations, the Commission required transmission providers to explain their timelines for calculating or submitting AARs as part of their compliance filings.<sup>41</sup> The Commission noted that transmission providers already manage similar timing issues with respect to load forecasts, forecasts for renewable generation, and generation bid deadlines, and that it may be that the deadlines for AAR calculation and submission are not significantly different from existing deadlines for submission of updates to generation supply offers and load.

**a. Filing**

23. ISO-NE has included an indeterminate implementation date in July 2025 for its proposed Attachment Q and anticipates that a further filing will be made denoting a

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<sup>40</sup> Filing, Transmittal Letter at 17.

<sup>41</sup> Order No. 881, 177 FERC ¶ 61,179 at P 143.

specific implementation date based on technical considerations for software and other needed implementation steps that are not fully known at this time.<sup>42</sup>

**b. Commission Determination**

24. We find that ISO-NE and PTO AC do not comply with the requirement in Order No. 881 to explain their timelines for calculating or submitting AARs.<sup>43</sup> However, we recognize that, because technical considerations for software and other needed implementation steps remain not fully known, ISO-NE's may be unable to determine its timelines until closer to AAR implementation and therefore additional time may be necessary to comply with this requirement. Therefore, we direct ISO-NE to file, no later than November 12, 2024 – eight months prior to ISO-NE's Attachment Q and PTO AC's Attachment M implementation date of July 12, 2025 – a further compliance filing that provides its timelines for calculating or submitting AARs.<sup>44</sup>

**3. Exceptions and Alternate Ratings**

25. In Order No. 881, the Commission adopted exceptions to the AAR and seasonal line rating requirements for both near-term and longer-term transmission service for two sets of circumstances, set forth in the *pro forma* OATT Attachment M.

26. First, where a transmission provider determines, consistent with good utility practice, that a transmission line rating of a transmission line is not affected by ambient air temperature or solar heating, the transmission provider may use a transmission line rating that is not an AAR or seasonal line rating.<sup>45</sup> According to *pro forma* OATT Attachment M, examples of such a transmission line may include: (1) a transmission line for which the technical transfer capability of the limiting conductors and/or limiting transmission equipment is not dependent on ambient air temperature or solar heating; or (2) a transmission line whose transfer capability is limited by a transmission system limit (such as a system voltage or stability limit) which is not dependent on ambient air temperature or solar heating.<sup>46</sup> The Commission required that, if the technical basis for

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<sup>42</sup> Filing, Transmittal Letter at 18-19.

<sup>43</sup> *See id.*

<sup>44</sup> ISO-NE should submit its compliance filing in an eTariff submittal using Type of Filing Code 80 – Compliance Filing in the above-referenced docket.

<sup>45</sup> Order No. 881, 177 FERC ¶ 61,179 at P 227.

<sup>46</sup> *Pro forma* OATT, attach. M (Obligations of Transmission Provider); *see also* Order No. 881, 177 FERC ¶ 61,179 at P 227.

such an exception changes, then the transmission provider must update the relevant transmission line ratings in a timely manner.<sup>47</sup> The Commission further required transmission providers to reevaluate any such exceptions at least every five years.<sup>48</sup>

27. Second, the Commission established an option for transmission providers to temporarily use a different transmission line rating from that which would otherwise be required by *pro forma* OATT Attachment M in instances when the transmission provider reasonably determines, consistent with good utility practice, that the use of such a temporary alternate rating is necessary to ensure the safety and reliability of the transmission system.<sup>49</sup>

a. **ISO-NE Proposal**

28. In its compliance filing, ISO-NE states that its proposed Attachment Q allows for certain transmission lines to be exempted from the application of AARs, in line with the requirements of Order No. 881.<sup>50</sup> ISO-NE explains that, however, the proposed Attachment Q does not contain the specific exception examples included in the *pro forma* Attachment M, but rather states that a detailed list of criteria for when a specific transmission line would be exempted from the application of AARs will be included in its Operating Documents.<sup>51</sup> ISO-NE argues that such an approach will prevent the potential for conflict between the list maintained in its Operating Documents and the examples outlined in the *pro forma* Attachment M. Specifically, ISO-NE proposes the following language in its proposed Attachment Q (changes underlined):

Exceptions: Where the Transmission Provider Transmission Owner determines, consistent with Good Utility Practice, that the Transmission Line Rating of a transmission line is not affected by ambient air temperature or solar heating, the Transmission Provider Transmission Owner may, consistent with the rights and obligations of the parties under each respective operating agreement, provide use a Transmission Line Rating for that transmission line that is not an AAR or Seasonal Line

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<sup>47</sup> Order No. 881, 177 FERC ¶ 61,179 at P 233.

<sup>48</sup> *Id.* PP 233, 342.

<sup>49</sup> *Id.* P 228.

<sup>50</sup> Filing, Transmittal Letter at 15.

<sup>51</sup> ISO New England Operating Documents are the Tariff and the ISO New England Operating Procedures. Filing, Transmittal Letter at 17 n. 33. *See* Tariff, section I.2.2 Definitions.

Rating. The criteria for determining whether ~~Examples of such a given transmission line may be excepted are contained in ISO-NE Operating Documents. may include (but are not limited to): (1) a transmission line for which the technical transfer capability of the limiting conductors and/or limiting transmission equipment is not dependent on ambient air temperature or solar heating; or (2) a transmission line whose transfer capability is limited by a Transmission System limit (such as a system voltage or stability limit) which is not dependent on ambient air temperature or solar heating.~~ The Transmission Owner Provider shall ~~must~~ document in its database of Transmission Line Ratings and Transmission Line Rating methodologies on OASIS or another password-protected website any exceptions to the requirements contained in this Attachment initiated under this paragraph, including the nature of and basis for each exception, the date(s) and time(s) that the exception was initiated, and (if applicable) the date(s) and time(s) that each exception was withdrawn and the standard rating became effective again. If the technical basis for an exception under this paragraph changes, then the Transmission Provider Owner shall ~~must~~ update the relevant Transmission Line Rating(s) in a timely manner. The Transmission Provider Owner shall ~~must~~ reevaluate any exceptions taken under this paragraph at least every five years.

29. Additionally, ISO-NE proposes to replace the term “Transmission Provider” with “ISO-NE” or “Transmission Owner” to ensure that each party’s obligations under the ISO-NE Tariff are clear.<sup>52</sup> ISO-NE contends that these modifications are consistent with Order No. 881, which allowed for regional flexibility in order to achieve its goals.

**b. Commission Determination**

30. We find that ISO-NE has not demonstrated that its proposal to include exceptions and alternate ratings criteria solely in ISO-NE Operating Documents is consistent with or superior to the *pro forma* OATT Attachment M. While ISO-NE contends that its proposal to delete the examples in *pro forma* OATT Attachment M will ensure there is no potential for conflict between the examples in the Tariff and a complete list of criteria in ISO-NE Operating Documents, we do not find this compelling. The examples in the *pro forma* OATT Attachment M provide the general circumstances in which transmission line ratings could be unaffected by ambient air temperatures and solar heating,<sup>53</sup> and it is unclear what confusion would be eliminated by removing these references. Accordingly, we direct ISO-NE to file, within 60 days of the date of this order, Tariff revisions that

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<sup>52</sup> *Id.* at 11.

<sup>53</sup> Order No. 881 177 FERC ¶ 61,179 at P 227.

include the examples listed in the *pro forma* Attachment M, or explain why it should not be required to do so.

**c. PTO AC Proposal**

31. PTO AC proposes revisions to Schedule 21, Attachment M to include the exception and alternate ratings section from the *pro forma* OATT, as well as additional language stating that there may be additional criteria granting exceptions from the application of AARs in ISO-NE's Operating Documents.<sup>54</sup> PTO AC also proposes to use the term "PTO" in place of the term "Transmission Provider" and "Local Point-to-Point Service or Local Network Service" in place of the term "Transmission Service" to reflect the unique features of Local Service provided under Schedule 21 of the ISO-NE Tariff.<sup>55</sup>

**d. Commission Determination**

32. We find that PTO AC's proposed language stating that there may be additional exception criteria specified in applicable ISO-NE Operating Documents is consistent with or superior to the *pro forma* OATT Attachment M. The examples of exceptions in the *pro forma* OATT Attachment M were not exhaustive of the situations where the transmission provider or transmission owner may determine, consistent with Good Utility Practice, that the transmission line rating or a transmission line is not affected by ambient temperatures or solar heating, and we find it is consistent with or superior to Order No. 881 to include additional such criteria in operating documents. Similarly, we find that the proposed terminology changes are consistent with or superior to the *pro forma* OATT Attachment M because they merely carry forward terms used elsewhere in the Tariff. Accordingly, we accept PTO AC's proposed revisions to Schedule 21, Attachment M.

**e. CSC LLC Proposal**

33. CSC LLC explains that its filing includes proposed revisions to Schedule 18, which governs Merchant Transmission Facility service, specifically that of the Cross-Sound Cable.<sup>56</sup> CSC LLC explains that the Cross-Sound Cable is a HVDC transmission line that is buried in the Long Island Sound, and as such is not impacted by ambient air temperature or solar heating. CSC LLC argues that, while the Commission did not adopt a blanket exception of the application of AARs for underground transmission lines in Order No. 881, the Cross-Sound Cable clearly falls within the Commission's stated

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<sup>54</sup> Proposed Schedule 21, attach. M.

<sup>55</sup> Filing, Transmittal Letter at 16.

<sup>56</sup> *Id.* at 18.

technical specifications that warrant such an exception.<sup>57</sup> CSC LLC states that, consequently, it has proposed revisions to Schedule 18 excepting the Cross-Sound Cable from the requirements of Order No. 881.<sup>58</sup>

**f. Commission Determination**

34. We find that CSC LLC has not demonstrated that its proposed revisions to Schedule 18 are consistent with or superior to the *pro forma* OATT Attachment M, which requires transmission providers to make postings to the database of transmission line ratings documenting uses of exceptions or temporary alternate ratings, and to reevaluate any exceptions taken under the “Exceptions” paragraph of *pro forma* OATT Attachment M at least every five years to ensure that longstanding exceptions continue to be valid.<sup>59</sup> Accordingly, we direct Filing Parties to file, within 60 days of the date of this order, a further compliance filing to either remove this language or explain why it should not be required to do so.

**4. Transparency**

**a. Transmission Line Ratings Database**

35. In Order No. 881, the Commission required transmission providers to maintain a database of their transmission owners’ transmission line ratings and transmission line rating methodologies on the password-protected section of their OASIS site or other password-protected website.<sup>60</sup> The Commission required that this database be in such a form that can be accessed by all parties with OASIS access or access to the password-protected website. The Commission further stated that transmission providers must maintain in their database records of which transmission line ratings and methodologies were in effect at which times over at least the previous five years.<sup>61</sup>

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<sup>57</sup> *Id.* (citing Order No. 881, 177 FERC ¶ 61,179 at P 227-29).

<sup>58</sup> *Id.* at 17-18.

<sup>59</sup> Order No. 881, 177 FERC ¶ 61,179 at PP 233-234, 341-342.

<sup>60</sup> *Id.* PP 336-340.

<sup>61</sup> Each record in the database must indicate to which transmission line the record applies and the date and time the record was entered into the database. The database must be maintained such that users can view, download, and query data in standard formats, using standard protocols. *Id.* P 340.

36. The Commission also required transmission providers to make postings to the database documenting any uses of exceptions (under the “Exceptions” paragraph of *pro forma* OATT Attachment M) or temporary alternate ratings (under the “System Reliability” section of *pro forma* OATT Attachment M).<sup>62</sup> The Commission required that such postings document the nature of and basis for each such exception or alternate rating, as well as the date(s) and time(s) of initiation and (if applicable) withdrawal for the exception or the alternate rating.<sup>63</sup>

i. **ISO-NE Proposal**

37. ISO-NE’s proposed Attachment Q requires each PTO to maintain transmission line rating methodologies as well as any temporary alternate transmission line ratings or exceptions in their database while ISO-NE would retain responsibility for posting transmission line ratings. Specifically, ISO-NE proposes the following language in its proposed revisions to Attachment Q (changes underlined):

Postings to OASIS or another password-protected website: The ISO and Transmission Provider must~~Owners shall~~ maintain on ~~the~~their respective password-protected sections of ~~its~~their respective OASIS pages or on another password-protected website a database of Transmission Line Ratings and Transmission Line Rating methodologies consistent with this Attachment.

The ISO’s database ~~must~~shall include a full record of all Transmission Line Ratings, ~~both~~ as used in ~~real time~~Day-Ahead and Real-Time Energy Markets and Real-Time operations, and as used for all future periods for which ~~Transmission Service is offered~~. Any postings of temporary alternate ~~Transmission Line Ratings or exceptions used under the System Reliability section above or the Exceptions section below, respectively, are considered part of the database~~. The database ~~must~~shall include records of which ~~Transmission Line Ratings and Transmission Line Rating methodologies were in effect at which times over at least~~that cover the previous five years, including records of which temporary alternate Transmission Line Ratings ~~or exceptions were in effect at which times during the previous five years~~. Each record in the database ~~must~~shall indicate which transmission line the record applies to, and the date and time the record was entered into the database. The database ~~must~~shall be maintained such that users can view, download, and query data in standard formats, using standard protocols.

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<sup>62</sup> *Id.* PP 330, 341.

<sup>63</sup> *Id.* P 341.

The Transmission Owners' databases shall contain a record of their respective Transmission Line Rating methodologies, as well as any temporary alternate Transmission Line Ratings or exceptions, including the nature and basis for each exception or alternate rating, used under the System Reliability section above or the Exceptions section below. Each record in the database shall indicate to which transmission line the record applies, and the date and time the record was entered into the database. The database shall be maintained such that users can view, download, and query data in standard formats, using standard protocols.<sup>64</sup>

ii. **PTO AC Proposal**

38. PTO AC's proposed Attachment M requires each PTO to maintain transmission line rating methodologies, which are not maintained by ISO-NE, as well as any temporary alternate transmission line ratings or exceptions in their database while ISO-NE would retain responsibility for posting transmission line ratings. Specifically, PTO AC proposes the following language in its proposed revisions to Schedule 21, Attachment M (changes underlined):

Postings to OASIS or another password-protected website: Each PTO~~The Transmission Provider~~ must maintain on their respective password-protected section of its their respective OASIS pages ~~or on another password-protected website~~ a database of Local Transmission Line Ratings and Local Transmission Line Rating methodologies.

The database must include a full record of all Local Transmission Line Ratings, both as used in real-time operations, and as used for all future periods for which Local Point-to-Point Service or Local Network Service~~Transmission Service~~ is offered. Any postings of temporary alternate Local Transmission Line Ratings or exceptions used under the System Reliability section above or the Exceptions section below, respectively, are considered part of the database. The database must include records of which Local Transmission Line Ratings and Local Transmission Line Rating methodologies were in effect at which times over at least the previous five years, including records of which temporary alternate Local Transmission Line Ratings or exceptions were in effect at which times during the previous five years. Each record in the database must indicate which Non-PTF transmission line the record applies to, and the date and time the record was entered into the database. The database must be

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<sup>64</sup> Proposed ISO-NE Tariff, attach. Q.

maintained such that users can view, download, and query data in standard formats, using standard protocols.<sup>65</sup>

### **iii. Commission Determination**

39. We find that Filing Parties have not demonstrated that their proposal is consistent with or superior to the requirement of Order No. 881 for transmission providers to maintain a database of their transmission owners' transmission line ratings and transmission line rating methodologies on the password-protected section of their OASIS site or other password-protected website.<sup>66</sup> Filing Parties propose to divide responsibility for such a database such that ISO-NE has responsibility for maintaining a database of transmission line ratings used in its Day-Ahead and Real-Time Markets while transmission owners have responsibility for maintaining databases of exceptions, transmission line rating methodologies, and transmission line ratings used in Local Service. In Order No. 881, the Commission required transmission providers to maintain a database of their transmission owners' transmission line ratings and methodologies.<sup>67</sup> The Commission further required that transmission line ratings stored in this database must include a full record of all transmission line ratings, both as used in real-time operations, and as used for all future market periods for which transmission service is offered.<sup>68</sup> As the Commission noted in Order No. 881, making transmission line ratings and methodologies available on the transmission provider's OASIS site or other password-protected website will allow other entities to have access to the database of transmission line ratings and methodologies, including when exceptions or alternate ratings are used, and will facilitate more cost-effective decisions by market participants and state agencies. We find that Filing Parties have not demonstrated how their proposal, which divides the required data across the databases of ISO-NE and its transmission owners, will ensure that transmission line rating information is available to a broad range of stakeholders.<sup>69</sup>

40. Accordingly, we direct Filing Parties to file, within 60 days of the date of this order, Tariff revisions requiring ISO-NE to host all transmission line ratings, ratings

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<sup>65</sup> Proposed Schedule 21, attach. M.

<sup>66</sup> Order No. 881, 177 FERC ¶ 61,179 at PP 336-340.

<sup>67</sup> *Id.* P 336.

<sup>68</sup> *Id.* P 339.

<sup>69</sup> *Id.* PP 336, 342.

methodologies, and exceptions or alternate ratings in a database maintained by ISO-NE, or explain why they should not be required to do so.

**5. Miscellaneous Issues**

**a. Effective Date**

**i. Filing**

41. Filing Parties propose that Filing Parties' filing be made effective on September 10, 2022, or any subsequent date that the Commission shall designate. ISO-NE included an indeterminate implementation date for Attachment Q in July 2025,<sup>70</sup> while PTO AC included an implementation date of July 12, 2025 for attachment M.<sup>71</sup> Filing Parties state that a further conforming filing will be made denoting a specific implementation date that will be based on technical considerations and other needed implementation steps that are not fully known at this time.<sup>72</sup>

**ii. Commission Determination**

42. We find that granting an effective date of September 10, 2022, as requested, could cause confusion because the proposed effective date of the compliance filing would then differ from the proposed July 2025 implementation date contained in Attachment Q and the July 12, 2025 implementation date contained in Attachment M. We therefore accept Filing Parties' compliance filing, to be effective July 12, 2025, the proposed implementation date for PTO AC's Attachment M<sup>73</sup> and the deadline for implementation specified in Order No. 881.<sup>74</sup> This finding is without prejudice to any future filing justifying an earlier effective date.

The Commission orders:

(A) Filing Parties' compliance filing is hereby accepted, to be effective July 12, 2025, subject to further compliance, as discussed in the body of this order.

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<sup>70</sup> Proposed ISO-NE Tariff, attach. Q.

<sup>71</sup> Proposed Schedule 21, attach. M.

<sup>72</sup> Filing, Transmittal Letter at 18-19.

<sup>73</sup> *Id.* at 8.

<sup>74</sup> Order No. 881, 177 FERC ¶ 61,179 at P 361.

(B) Filing Parties are hereby directed to submit a further compliance filing, within 60 days of the date of issuance of this order, as discussed in the body of this order.

(C) Filing Parties are hereby directed to submit a further compliance filing, no later than November 2024, explaining the AAR timelines, as discussed in the body of this order.

By the Commission.

( S E A L )

Kimberly D. Bose,  
Secretary.