

**Compliance Directives in FERC’s 4/18 Order Regarding the NYISO’s Order No. 1000
Regional Transmission Planning Compliance Filing**

¶	Topic	Existing/Proposed NYISO Tariff	FERC Finding	Other ISO/RTO Orders	Tariff Section/ Response
Selection of the More Efficient or Cost-Effective Transmission Solution					
75, 77- 81 241 - 242	Reliability Planning Process	Existing process provides that the NYISO evaluates all proposed solutions to Reliability Needs and the NYPSC selects the solution to be built.	<p>The NYISO must both evaluate and select the more efficient or cost effective solution for purposes of cost allocation. States must be able to participate in the process, to provide guidance and recommendations, but not to select solutions.</p> <p>Must revise tariff to explain how the NYISO will consider efficiency and cost effectiveness and explain why a transmission project was or was not selected.</p>	<p>PJM – Compliant, tariff explicitly requires PJM to select the most efficient or cost effective solution.</p> <p>MISO – Generally compliant, but proposal to let certain states, that have such authority, select eligible transmission developers is not compliant. While states may participate, they cannot select.</p> <p>CAISO – Partially compliant. Must select and explain the factors it will use to select the most efficient or cost-effective solution. Must revise one section of tariff to explicitly state that it will select the more efficient or cost effective solution, current language provides that it will select “in the most prudent and cost effective manner.” CAISO must also delete provisions providing that the siting authority could make the transmission developer selection where there are two or more projects which have designated the same siting authority.</p>	<p>Add new sections following:</p> <p>31.2.5</p> <p>(may also need to modify other sections)</p> <p>Add evaluation & selection process</p>
75- 76 245	Economic Planning Process	Existing process provides that the NYISO evaluates the projects and identifies beneficiaries. Projects are selected by beneficiaries using a super-majority voting process.	Compliant—including the super-majority voting process.	Same as above.	NO CHANGE

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145-147	PPR Planning Process	Proposed process provides that the NYISO evaluates the projects, and the NYPSC selects the solutions.	Not compliant. The NYISO must both evaluate and select the more efficient or cost effective solution for purposes of cost allocation. States must be able to participate in the process, to provide guidance and recommendations, but not to select solutions.	PJM – Accepted ”complementary” proposal to allow states to select PPR projects to be included in the regional transmission plan, where states agree to voluntarily assume responsibility for the allocation of all project costs. Tariff explicitly requires PJM to select the most efficient or cost effective solution. MISO/CAISO – Same as above.	Add new sections following: 31.4.4 31.4.1, 31.4.8 (may need to modify these sections) Add evaluation & selection process
80-159	Local Transmission Planning Process	Proposed language provides that the NYISO reviews the Local Transmission plans to identify more efficient or cost effective regional transmission solutions to local needs.	Compliant.	PJM/MISO – Compliant. CAISO – No separate local transmission planning process, as the three investor-owned utilities do not have such processes separate from the regional transmission planning process. FERC notes that this is compliant with Order No. 1000.	NO CHANGE
Comparable Consideration of All Solutions					
237-239-242	Reliability Planning Process	Considers all resources on a comparable basis, including non-transmission alternatives. However, existing process	Partially Compliant. Must revise the tariff to provide for the same detail for evaluation of	PJM – PJM’s proposed language removed certain tariff provisions that FERC used to find compliance with comparability for Order No. 890 filing. PJM must explain	OATT Section: 31.2.5.4

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		provides for evaluation of alternative regulated solutions in more detail only if market-based solutions are insufficient.	alternative regulated solutions and reliability backstop solutions “in all circumstances.”	how its tariff complies with the comparability principle, absent those provisions. MISO – Explained that its process considers non-transmission solutions. FERC did not require additional detail on that process. CAISO – Compliant.	Revise as directed
244-246	Economic Planning Process	Existing process considers all types of solutions, including non-transmission alternatives	Compliant.	Same as above.	NO CHANGE
148-149	Public Policy Requirements Planning Process	Proposed language provided that the NYISO would evaluate non-transmission alternatives when requested by the NYPSC.	Must file a process that provides for evaluation of non-transmission alternatives on a comparable basis. Must also provide a process to allow stakeholders and interested parties to submit proposals for non-transmission alternatives.	Same as above.	OATT Section: 31.4.2.1 31.4.3 31.4.4 Revise to provide for non-transmission proposals, add evaluation process, and remove PSC request.

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					May need to create a new subsection
Other Public Policy Planning Process Requirements					
136-140	Definition of the term “Public Policy Requirements”	Proposed to define PPR as : “a federal or New York State statute or regulation, including a NYPSC order adopting a rule or regulation subject to an in accordance with the State Administrative Procedure Act, or any successor statute, that drives the need for expansion or upgrades to the New York State Bulk Power Transmission Facilities.”	Partially Compliant Approved including of PSC Order under SAPA. Must revise definition to delete the phrase “drives the need for expansion or upgrades to the New York State Bulk Power Transmission Facilities” and must include consideration of laws or regulations passed by local government entities.	PJM/MISO/CAISO – Must modify the PPR definition to include local government laws or regulations. CAISO – Must also remove language indicating that PPRs must not be “inconsistent with the Federal Power Act.”	OATT Section: 31.1.1 Revise as directed
141-142	Identification of Needs	Proposed language provides that the NYDPS with input from the NYISO and stakeholders will identify PPR driven transmission needs and the NYDPS will select the needs for which solutions are to be proposed for evaluation by the NYISO.	Compliant.	PJM – Proposed revisions to identify needs driven by PPRs. Directed to clarify whether it will incorporate all stakeholder identified PPRs or some subset. MISO – Argued that its existing process already considers PPRs, so no further changes needed. Directed to address in greater detail the process for identifying needs driven by PPRs. Also need further detail regarding timing of consideration of PPRs in the MISO process.	NO CHANGE

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				CAISO – Existing process already provides for identification of needs, but adds language to allow stakeholder identification of needs.	
143, fn. 270	Process for posting of explanation of needs selected for further evaluation	Proposed language provides that the NYDPS will provide the NYISO its explanation of needs selected for further evaluation, which the NYISO will post on its website.	Compliant, but if NYDPS doesn’t provide a statement for posting, the NYISO must provide one.	<p>PJM - Must include a process for evaluation and posting of how it made its decision.</p> <p>MISO – Compliant.</p> <p>CAISO – Must propose language to comply with posting requirement. Cannot rely on the explanation that a PPR was “inconsistent with the Federal Power Act” as an explanation for why a certain need was not selected for further evaluation.</p>	OATT Section: 31.4.2.1 Revise as directed
144	Evaluation of potential solutions	Proposed language provides that the NYISO will use its existing databases, models, and tools to evaluate PPR solutions.	Compliant.	<p>PJM – Must provide more detail regarding which solutions will be incorporated into the process and studies.</p> <p>MISO – Further details required regarding how it will evaluate PPRs.</p> <p>CAISO – Directed to change language to provide that CAISO “shall” (not “may”) evaluate identified needs.</p>	NO CHANGE
150	Role of LIPA	LIPA had proposed that it should have the decisional role regarding transmission needs driven by public policy on Long	FERC did not require revisions to address LIPA’s proposal, but if the parties agree to further modifications that are consistent with FERC’s order	N/A	TBD

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		Island.	they may be included in the next compliance filing.		
156-160	Inclusion of PPRs in Local Transmission Plans	Proposed language provided that NYTOs would identify solutions, with stakeholder participation and post findings.	Partially complies, but revisions necessary to: (1) establish how NYTOs will identify which needs will be evaluated for solutions, including explanation on how the NYTO determines whether to move forward regarding identified needs; (2) establish procedures to evaluate the solutions to the identified needs, including those proposed by stakeholders.	<p>PJM – Sub-regional RTEP committees provide a forum for identifying and considering PPRs. PJM must explain how the TOs have incorporated this element of Order No. 1000 in their LTPs.</p> <p>MISO – Local TOs amended their tariffs. FERC found that the tariff changes lacked details regarding timing, how the PPRs would be incorporated and procedures for PPRs in the LTPs. Directed the establishment of procedures for identification, evaluation, and posting, as well as stakeholder opportunity for input.</p> <p>CAISO – No separate local planning process, as the three IOUs do not have processes separate from the regional transmission planning process. Compliant.</p>	<p>OATT Section: 31.2.1.1.2</p> <p>NYTOs to provide clarification as directed</p>
327-328	NYPSC request for PPR solutions from incumbents only	Proposed to allow the NYPSC to request PPR solutions from incumbent transmission owners who could recover those costs.	Proposal is unduly discriminatory. Must revise the tariff to provide that NYPSC can request solutions from both incumbents and/or non-incumbents and that both must be eligible for cost recovery.	N/A	<p>OATT Section: 31.4.3.3</p> <p>Revise as directed</p>
51	NYPSC Role in dispute resolution	NYPSC will resolve disputes regarding its decision on which PPR needs should have solutions proposed for them.	Compliant.	N/A	NO CHANGE

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Cost Allocation and Cost Recovery for Reliability and Economic Projects					
310-314	<p>Principle 1 (Cost allocations must be at least roughly commensurate with benefits)</p> <p>Principle 2 (No involuntary cost allocations to non-beneficiaries)</p>	Existing language provides for a beneficiaries pays methodology that: (1) for the reliability planning process allocates to zones that give rise to the Reliability Need first, and any remainder to meet a statewide need is applied to all zones; (2) for the economic planning process allocates costs based on relative economic benefits apportioned according to zonal load savings.	Compliant.	<p>PJM – 50/50 Hybrid cost allocation method, which allocated ½ of regional or necessary lower voltage costs based on postage stamp and ½ on the solution based DFAX method. Partially compliant, more information required regarding how the DFAX method will be used.</p> <p>MISO – Compliant. Allocates costs of MVP projects 100 percent regionally. MEPs which are focused on addressing congestion relief are allocated 20 percent regionally, based on the approximate proportion of regional and non-regional benefits of MEPs. The remaining 80 percent is allocated based on the distribution adjusted production cost savings across MISO’s local zones.</p> <p>CAISO – Cost allocation methodology uses access charges to allocate the costs of transmission facilities to CAISO’s controlled grid based on their actual MWh use of the system. Compliant.</p>	NO CHANGE
315	Principle 3 (Benefit to cost threshold cannot be greater than 1.25 unless justified)	The existing tariff provisions include 1.0 benefit to cost threshold.	Compliant.	PJM/MISO/CAISO - Compliant.	NO CHANGE
316	Principle 4 (Costs must be allocated solely within the planning region,	Proposed language indicating that the NYISO would identify consequences for other regions. Noted that would address consequences and whether it agreed to	Requires the NYISO to, in the further compliance filing, identify consequences in other regions and whether the NYISO has agreed to	PJM/MISO/CAISO – All must submit a further compliance filing indicating how they will consider consequences of regional transmission facilities on other regions.	OATT Section 31.2.2.7 31.3.1.6 31.5.2

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	unless other region voluntarily assumes costs. Must identify consequences of regional transmission facilities on other regions)	bear costs for upgrades located in another region in the interregional compliance filing.	bear costs for upgrades located in another region.	CAISO – Must address whether it has agreed to bear costs of upgrades located in another region.	Revise as directed/ discuss with neighbors NYISO does not agree to bear upgrade costs
317	Principle 5 (Cost allocation methodology and data requirements for determining benefits and identifying beneficiaries must be transparent)	Existing language sets forth the data requirements and process for determining benefits and identifying beneficiaries in a manner that allows stakeholders to determine how they were applied.	Compliant.	PJM/MISO/CAISO – Compliant.	NO CHANGE
317	Principle 6 (Regions may choose different types of cost allocation methods for different types of facilities)	Reliability, economic, and PPR projects all have different cost allocation methodologies.	Compliant.	PJM/MISO/CAISO - Compliant.	NO CHANGE

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326	Cost recovery for incumbents	Existing language in the reliability process allows for incumbents to receive recovery for costs incurred to develop a reliability backstop solution.	Found to be “just and reasonable” even if the project is not selected. Non-incumbents are eligible for recovery if their solutions receive necessary approvals and are halted after being selected.	N/A	NO CHANGE
Cost Allocation for Public Policy Requirements Projects					
320-323	Principles 1 & 2	Proposed language included a default load ratio share methodology that allocates costs to all loads statewide, unless an alternative is proposed by the PPR, NYPSC or the Developer and approved by FERC.	Must provide additional support for the default methodology or propose an alternative that complies with Principles 1 and 2.	PJM/MISO/CAISO – Compliant.	NO CHANGE
323	Principle 3	The proposed language did not include a threshold.	Not relevant because no threshold proposed.	PJM/ MISO/CAISO – Compliant.	NO CHANGE
310, 322-323	Principle 4	As with reliability and economic projects, the NYISO proposed language indicating that the NYISO would identify consequences for other regions. Noted that would address consequences and whether it agreed to bear costs for upgrades located in another region in the interregional compliance filing.	Requires the NYISO to identify consequences in other regions and whether the NYISO has agreed to bear costs for upgrades located in another region.	<p>PJM/MISO/CAISO – Must submit a compliance filing indicating how they will consider consequences of regional transmission facilities on other regions.</p> <p>CAISO – Must also indicate whether it has agreed to bear costs of facilities located solely in another region.</p>	<p>OATT Section: 31.4.4.1 31.5.2</p> <p>Revise as directed/ discuss with neighbors</p>

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					NYISO does not agree to bear costs
322	Principle 5	Existing language sets forth the data requirements and process for determining benefits and identifying beneficiaries in a manner that allows stakeholders to determine how they were applied.	Compliant.	PJM/MISO/CAISO - Compliant.	NO CHANGE
322	Principle 6	Reliability, economic, and PPR projects all have different cost allocation methodologies.	Compliant.	PJM/MISO/CAISO – Compliant.	NO CHANGE
324-325	Cost Allocation Methodology	Proposed language included a four-step process whereby if the PPR, the NYPSC, or the Developer did not propose an alternative, the load ratio share methodology would apply. Alternative methodologies would be filed with FERC for acceptances.	Accepted because alternative methodologies are approved by FERC. The NYISO must submit timeline for completing the process and explain how the process will not cause unnecessary delays.	PJM/MISO/CAISO – Compliant.	OATT Section: 31.5.5.4 Revise as directed Include explanation in filing letter
Qualification, Information, and Monitoring Requirements					
191-200	Entity qualification criteria	Proposed pre-qualification and qualification criteria, which looked at, among other things, financing, experience, right of way, interconnection	Partially Compliant Must set a timeframe to inform an entity whether it has qualified. Must remove criteria that require the	PJM –Criteria found to be mostly compliant, but must clarify letter of credit and Designated Entity Agreement criteria, including specifying that they apply to both incumbents and non-incumbents.	OATT Section: 31.2.4.1.1 31.3.2.4.1.1 31.4.5.1

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		agreements, etc.	<p>NYISO to consider whether an entity is eligible to offer a regulated solution.</p> <p>Information that must be submitted to demonstrate compliance with financial criteria must be explained in more detail. Remove reference to an entity’s ability to license a proposed transmission solution. Remove the requirement that an entity demonstrate Site Control. Must remove criteria requiring experience and ability in acquiring rights of way.</p>	<p>MISO –Directed to distinguish between qualification and evaluation criteria.</p> <p>CAISO – Argued that its tariff already included specific qualification criteria. FERC found that the criteria were not compliant and were not distinguishable from the project information requirements. Criteria were also included in the Business Manual. Directed to clarify the qualification vs project criteria and include the specific criteria from the Business Manual in the tariff.</p>	<p>31.2.4.1.3 31.3.2.4.1.3 31.4.5.3 Revise as directed</p>
210-213	Project information requirements	Proposed detailed list of information that must be submitted, including status of contracts, permits, financing, etc.	<p>Partially Compliant Must further describe the evidence that must be submitted regarding the status of contracts or required permits and evidence of financing.</p> <p>Must explain why Responsible TOs do not have to provide that same information.</p> <p>Need to set a date by which project information must be submitted to be</p>	<p>PJM – Proposed detailed project information requirements and deadlines. Found to be compliant, but directed to modify the deadlines for approvals to make them part of the monitoring requirements, not the project information requirements. Proposed deadlines for submittal, that FERC found vague and PJM must clarify.</p> <p>MISO – Proposed detailed project information requirements and deadlines, which included a deposit of \$500,000. Found to be compliant, but MISO must provide justification of the \$500,000 deposit amount. Proposed that project proposals be submitted no later than 180 days after request.</p>	<p>OATT Section: 31.2.4.3.1 31.2.4.3.2 31.2.4.5 31.2.4.7 31.3.2.4.2 31.4.8.1 31.2.4.1.4 31.3.4.4.1.4 31.4.5.4 Revise as</p>

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			considered in a given transmission planning cycle. Dates may be flexible or rolling.	CAISO – Argued that its tariff already included specific qualification criteria. FERC found that the criteria were not compliant and where not distinguishable from the project information requirements. Criteria were also included in the Business Manual. Directed to clarify the qualification vs project criteria and include the specific criteria from the Business Manual in the tariff.	directed
199	Compliance with Reliability Criteria	NYISO proposed a new Section 31.6.5 which provided that entities developing a project in the NYCA must registers with NERC and NPCC and comply with all applicable Reliability Criteria.	Directed the NYISO to either delete Section 31.6.5 or provide further justification regarding why it is necessary	N/A	NO CHANGE. Explain in filing letter.
250	Reevaluation process	Provides criteria and deadlines by which certain information must be submitted and progress must be made. Allows the NYISO to find an alternative solution if deadlines not met.	Compliant.	PJM – Projects would be reevaluated if they failed to provide a development schedule, letter of credit or meet a milestone that delays the in-service date. PJM may remove a project if necessary. Compliant, but PJM must provide further information regarding the basis on which it will retain or remove a selected transmission project. MISO – Proposed a variance analysis which will be conducted using project and developer status updates. Also proposed a cost tracking system with pre-designated milestones. Found compliant, but require more information on the pre-designated milestones.	NO CHANGE

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				<p>CAISO – Requires status reports, submittal of construction plans, provides that if there is a delay that threatens reliability, CAISO will require the developer of that project to propose a mitigation plan. CAISO can require a responsible TO to build an abandoned project. CAISO agreed that it would consider other alternatives before directing the participating transmission owner to build the project. CAISO will make the determination by evaluating whether the project is needed as configured or if other solutions are more appropriate. Found partially compliant. CAISO must revise the tariff to explicitly state that it will conduct assessments before requiring a responsible TO to build an abandoned economic or PPR project. Also, mitigation plan provision is duplicative of NERC requirements and must be removed from the tariff.</p>	

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Non-Incumbents/Right of First Refusal (“ROFR”)					
168	ROFR	The NYISO tariff does not contain a ROFR	Compliant. Agreed that the NYISO tariff does not contain a ROFR.	<p>PJM – Argued that its ROFR was protected by Mobile-Sierra. Alternatively, proposed revisions. FERC found no Mobile-Sierra protection. Accepted proposed revisions, but directed PJM to remove “any provision that could be read” as providing a ROFR.</p> <p>MISO – Argued that its ROFR was protected by Mobile-Sierra. Alternatively, proposed revisions. FERC found no Mobile-Sierra protection. Accepted MISO revisions that eliminated the existing ROFR.</p> <p>CAISO – Argued that its tariff does not contain a ROFR. FERC found that CAISO’s tariffs uses too many different terms to refer to projects, which cause confusion and directs CAISO to review the terms and clarify them as necessary.</p>	NO CHANGE
169-172, fn. 314	Exceptions to ROFR Elimination	Proposed language to preserve incumbent TO rights (<i>i.e.</i> , upgrades, rights of way, and local solutions not eligible for cost allocation).	<p>Must define the term “upgrade” consistent with Order No. 1000-A definition (<i>i.e.</i>, “an improvement to, addition to, or replacement of a part of, an existing transmission facility. The term does not refer to an entirely new transmission facility”).</p> <p>Distinguished the NYTOs’ right to use or build in existing rights of way from the PJM and MISO proposals.</p>	<p>PJM - Proposed state or local ROFR provisions that FERC rejected because it found they went beyond mere reference to state or local regulations or TO’s existing right of ways and attempted to create a federal ROFR. Also proposed a ROFR regarding upgrades to existing TO facilities whose costs would be allocated solely to the relevant TO zone. FERC accepted that proposal.</p> <p>MISO – Proposed state or local ROFR provisions that FERC rejected because it found they went beyond mere reference to state or local regulations or TO’s existing right of ways and attempted to create a federal ROFR.</p>	<p>OATT Section: 31.6.4</p> <p>Revise as directed</p>

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				CAISO – Retained existing language providing incumbent TOs have rights to upgrade their existing transmission facilities and local transmission facilities. Found compliant.	
255	Eligibility for Non-Incumbents to utilize cost allocation	All Parties may use the NYISO's cost allocation and cost recovery tariff provisions.	Compliant.	<p>PJM – Partially compliant. PJM's revisions are intended to allow non-incumbents cost recovery similar to incumbents, however, existing OATT and CTOA would preclude non-incumbents from filing the agreements required for cost allocation and cost-based rates under PJM's OATT until after provisions of transmission service. Must revise the tariff to enable a non-incumbent transmission to file the agreements or explain why the identified provisions do not prevent a non-incumbent from doing filing the agreements.</p> <p>MISO – Compliant, including MISO's provisions indicating that cost recovery is only provided once a non-incumbent becomes a transmission owner.</p> <p>CAISO - Compliant.</p>	NO CHANGE

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General Requirements					
24-28	Scope of Transmission Planning Region	Planning region is New York State.	Compliant.	<p>PJM - Existing PJM region, found to be compliant.</p> <p>MISO - Existing MISO region, found to be compliant.</p> <p>CAISO – Existing CAISO region, found to be compliant.</p>	NO CHANGE
26-28	Effective Date	Effective as of the beginning of the next planning cycle following a final FERC order.	FERC directed the NYISO to make the revisions, and directed compliance modifications, effective as of next reliability planning cycle following the order issuance date or justify an alternative date.	<p>PJM – Delay effectiveness until all compliance issues have been resolved. Not compliant, modifications to be made effective coincident with the beginning of the next planning process, or justify an alternative date.</p> <p>MISO – With the first annual planning cycle beginning June 1, following the issuance of the order accepting its filing. Compliant, revisions effective June 1, 2013, subject to further compliant.</p> <p>CAISO – October 1, 2013. Found to be compliant.</p>	<p>OATT Section: 31.5.1.8</p> <p>Revise as directed</p> <p>Explain in filing letter</p>
25-28	Transition process for transmission projects currently under review	Proposed to apply the new PPR process upon the effective date of the new provisions; no change regarding economic and reliability projects because no significant changes to those processes.	Explain which transmission projects will be subject to Order No. 1000 provisions, including the compliance changes that require selection by the NYISO and greater evaluation of non-transmission alternatives, as well as regulated alternative solutions.	<p>PJM –Directed to provide information regarding its transition to the revised regional transmission planning process, including an explanation of how it will evaluate transmission projects currently under consideration.</p> <p>MISO – Apply to projects evaluated and approved as part of the MTEP 2014 cycle. Found to be compliant.</p> <p>CAISO – Apply to projects evaluated in the 2013/2014 planning cycle. Found to be compliant.</p>	<p>OATT Section: 31.5.1.8</p> <p>Revise as directed</p> <p>Explain in filing letter</p>

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27-28	Enrollment process	Explained that public utility and non-public utility transmission providers fully participate in the NYISO's process.	Must provide a clear enrollment process defining how entities, including non-public utility transmission providers, become part of the NYISO transmission planning region.	<p>PJM – Has specific procedures an entity must complete to become a full PJM TO and be eligible to be allocated costs under the regional methods. Found to be compliant.</p> <p>MISO – Proposal requires an entity to become a TO by signing the TO Agreement and by, within a reasonable time, (1) turning over functional control of its transmission facilities to MISO, and (2) taking service under the MISO Tariff for all of the load that is physically located within the geographic area comprising MISO's transmission system. Compliant.</p> <p>CAISO – Process is in the tariff. Any entity that is not a TO will become one when it energizes a project and executes the transmission control agreement. Compliant.</p>	<p>OATT Section: Add new Section in 31.6</p> <p>Explain in filing letter</p>
27-28	Provide a list in the OATT of all enrolled transmission providers	None provided.	Include a list of all enrolled public utility and non-public utility transmission providers.	<p>PJM – List is contained in TO Agreement. Compliant.</p> <p>MISO – Are listed in tariff. Compliant.</p> <p>CAISO – List is included in its tariff and agreements. Compliant.</p>	<p>OATT Section: Add new section in 31.6</p> <p>Provide list of the current Transmission Owners</p>
82	Merchant transmission project information	Existing language provides for merchant projects to submit information, also considers such projects in regional plan.	Compliant.	PJM – Existing practice is to obtain sufficient information from such developers in order to assess potential project reliability and operational impacts of a project. Compliant.	NO CHANGE

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	requirements			<p>MISO – Revised its tariff to indicate what information and data these developers must provide, including descriptions and key technical parameters for proposed facilities, points of interconnection, and proposed facility models. Compliant.</p> <p>CAISO – During phase 2 of its process, CAISO will accept proposals from merchant transmission facilities, who must submit the same forms all other projects submit, which will provide the CAISO with the information needed for such projects. Compliant.</p>	
83	Separate processes	The NYISO's regional transmission planning process has separate reliability, economic, and planning processes.	Rejects protests asking for integrated process but encourages the NYISO and stakeholders to explore options to improve the processes.	<p>PJM/MISO – have integrated processes.</p> <p>CAISO – has separate processes but they are integrated in that any project could be selected to meet a reliability, economic, or PPR need.</p>	NO CHANGE