

FERC Interconnection Order: NYISO/TO Joint Compliance Filing OVERVIEW

By

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General Overview

- **Adopts “pro-forma” language in general, except:**
 - *Where legitimate “regional differences” exist*
 - *Modified to conform to NYISO practices*
 - *Modified to conform to NYISO OATT definitions/terminology*
- **Refrains from addressing issues raised on rehearing by various parties**
 - *(FERC has directed Compliance Filings while action is pending on rehearing issues)*
- **Retains “Attachment S” Class Year and Cost Allocation procedures**
- **Retains existing NYISO Minimum Interconnection Standard**

General Overview (Cont'd)

- **Adopts Pro-forma study sequence**
 - *Feasibility Study*
 - *System Impact Study (Incorporate NYISO SRIS)*
 - *Facilities Study (Incorporate NYISO Attachment S)*
 - *Optional Study*
- **Adopts Three-Party Interconnection Agreement**
- **Specifies the respective roles and responsibilities of the NYISO and Transmission Owners**
 - *NYISO is responsible for administration of the interconnection process, (including studies and cost allocation)*
 - *TOs are responsible for implementation (including equipment procurement and construction of upgrade facilities)*

Major Issues

➤ **Scope of NYISO's Compliance Filing**

- *NYISO Tariff is applicable to all transmission interconnections in NY*
- *Does not confer greater operational control on NYISO with respect to transmission facilities than is currently the case*
- *Distribution interconnections to be addressed later*

➤ **Interconnection Product ("Deliverability")**

- *Filing includes current MIS requirement*
- *Filing letter indicates that NYISO will perform a study to analyze the impact of including a deliverability product in NY*

Major Issues (Cont'd)

➤ Merchant Transmission

- *Includes MT in the Interconnection Procedures but not IA*
- *Filing letter indicates that NYISO will work with its stakeholders to modify the standard IA as needed for MT*

➤ Attachment S

- *Retains existing Attachment S process*
- *Makes conforming changes as needed (e.g. – 115kv)*
- *Filing letter acknowledges that improvements are under development within the NYISO stakeholder process*
 - ▶ Improvements may include revisions to Attachment S
 - ▶ Procedures required to support compliance filing to include interconnection construction scheduling and budget status reporting

Major Issues (Cont'd)

➤ Joint Process for Interconnection Agreements

- *Joint NYISO and TO participation in the entire process—from initial tender of pro-forma IA, through negotiations with Developer, to filing of IA with FERC*
- *Executed Agreement*
 - ▶ Joint filing following execution
- *Unexecuted Agreement*
 - ▶ Joint filing at the request of Developer
 - ▶ TO to provide language for issues in dispute
 - ▶ TO to assume the burden of justifying departure from *pro forma*
 - ▶ *NYISO comments on disputed issues/alternate language contained in filing letter*

Joint Compliance Filing by NYISO & TOs

➤ Reservation of Rights

- *NYISO and TOs agree that this filing “..does not in any way waive, diminish or expand the rights of the NY TOs..”*
- *LIPA and NYPA do not waive their non-jurisdictional status under the FPA*
- *LIPA, NYPA and Con Ed reserve their rights regarding their tax-exempt financing requirements & obligations*
- *TOs reserve their rights on rehearing issues, except:*
 - ▶ TOs will continue to support the provisions related to three-party IAs, assuming that the Compliance Filing is approved by FERC without material modification
- *TOs reserve the right to comment on limited aspects of compliance filing where consensus with NYISO was not achieved*