

# **FERC Interconnection Order: Status Update & Schedule for Compliance Filing**

By  
Garry Brown

Management Committee Meeting  
September 17, 2003  
NYC

# Key Issues for NYISO Compliance Filing

- Framework of the Final Rule is inconsistent with existing NYISO procedures
  - *In several significant areas*
  - *In numerous specific provisions*
- FERC indicates it will grant ISOs and RTOs “considerable flexibility to customize the interconnection process” during the compliance phase
- Need to determine whether to adopt certain provisions of the Final Rule or to request retention of existing NYISO practices under the “independent entity variation” standard
  - *Review significant structural differences*
  - *Review specific provisions*
- Significant effort to address standard IP and IA requirements

# Proposed Schedule

- **Aug 20**      **Special TPAS/IITF Meeting**
  - » NYISO summarized order/compared with current NYISO procedures
- **Aug 28**      **MC Meeting**
  - » NYISO discussed process
- **Sept 2**        **TPAS/IITF Meeting**
  - » Review issues/present preliminary NYISO Staff positions/seek MP input
- **Sept 9/10**    **BIC/OC Meetings**
  - » Review/discuss preliminary NYISO positions

# Proposed Schedule (Cont'd)

- **Sept 12**      **NYISO Filed for Extension of Time**
  - » Requested 90-day extension for compliance filing
- **Sept 17**      **MC Meeting**
  - » Status update/review schedule
- **Sept 30**      **TPAS/IITF Meeting**
  - » Review proposed modifications to Pro-Forma Interconnection Procedures
- **Oct 18**        **Compliance filing due at FERC**

# Issues & Next Steps

- Significant effort is required; process to continue without delay
- NYISO's intent is to achieve consensus and stakeholder support for its compliance filing
  
- *Next Steps:*
  - *NYISO filed request for 90-day extension on 9/12*
  - *NYISO to develop a stakeholder plan/process for preparation of Compliance Filing in conjunction with TPAS/IITF*
  - *NYISO to prepare red-lines of pro-forma IP and IA*