

# **FERC Interconnection Order: Preliminary NYISO Staff Position & Schedule for Compliance Filing**

By

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BIC/OC Meetings

Agenda #12

September 9/10, 2003

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# 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

# Preliminary NYISO Staff Position

- **Interconnection Product Definition**
  - *Retain current NYISO single interconnection product*
- **“Hard Queue” Requirement**
  - *Retain hard queue for study purposes*
  - *Retain “Class Year” for cost allocation*
  - *Investigate movement towards a 180-day cycle*
- **Cost allocation/pricing policy provisions**
  - *Retain “Attachment S” procedures*
- **Specific Interconnection Study Requirements**
  - *Adopt FERC’s study sequence*
  - *Modify to accommodate NYISO’s practices*

# Preliminary NYISO Staff Position (Cont'd)

- **“Pro-forma” Interconnection Procedures**
  - *Modify to incorporate NYISO practices*
  - *Modify to identify NYISO/TO responsibilities*
- **Three-Party Interconnection Agreement**
  - *Modify to incorporate NYISO practices*
  - *Modify to identify NYISO/TO responsibilities*
- **Applicability Provisions**
  - *Generation Only*
    - ▶ Modify to apply to merchant transmission
  - *“Distribution level” interconnections*
    - ▶ Modify current NYISO criteria to eliminate 115kV voltage threshold

# Other Issues: Specific Issues

- Many specific issues that differ or add to existing NYISO interconnection/cost allocation procedures
  - *Queuing procedures*
  - *Study procedures*
  - *Interconnection agreements*
  - *Scheduling options for construction*
  - *Liability issues*
- Some issues may be moot if the NYISO proposes to retain its existing interconnection practices
- Others will need to be accommodated in the NYISO compliance filing since the existing NYISO practices do not address them

# 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
- **Sept 17**      **MC Meeting**
  - » Review/discuss preliminary NYISO positions
- **Oct 18**        **Compliance filing due at FERC**

# Issues & Next Steps

- NYISO, with TPAS concurrence, has determined that an extension of time should be requested
- 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 to file request for extension*
  - *NYISO to develop a stakeholder plan/process for preparation of Compliance Filing in conjunction with TPAS*
  - *NYISO to prepare red-lines of pro-forma IP and IA*