

Incremental Revisions to Interconnection Order No. 2023 Compliance Plan and Tariff Review

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Agenda

- **Tariff Review Schedule**
- **Overview of New NYISO Interconnection Procedures – OATT Attachment HH (Conceptual Revisions indicated in red)**
 - Clean and redline versions of draft tariff (redlines showing incremental edits to materials posted for the 2/6/2024 IITF) are posted with the meeting materials
- **Key Conceptual Changes to the Compliance Plan as Proposed at the February 6, 2024 IITF and Additional Information in Response to Stakeholder Feedback on the following:**
 - COD Extensions and Demonstrations of Reasonable Progress
 - Site Control Requirements
 - Energy Storage Operating Assumptions
 - Transition Timeline and Cluster Study Start Date Calculation
 - Additional SDU Study Rules
 - Pending Studies Commenced under the Existing NYISO Attachment S, X, and Z Interconnection Procedures
 - Affected System Studies
 - IEEE Attestations
- **Next Steps**

Tariff Review Schedule

Stakeholder Tariff Review Meetings

- **February 16th and March 1st**
 - Review incremental revisions to the proposal and draft tariff
 - Review additional OATT and MST tariff revisions (primarily conforming revisions to align with the new Attachment HH)
 - Discuss Energy Storage Operating Assumptions
 - Discuss Site Control requirements (technology-specific acreage requirements and definition of Regulatory Limitations)
 - Follow up items from Initial Stakeholder Comments
- **Mid-March IITF**
 - Review any additional incremental revisions to Compliance Proposal and tariff in response to Stakeholder Feedback

Tariff Approach

- At the December 14, 2023, Operating Committee (OC) meeting, the NYISO presented to stakeholders its comprehensive compliance plan for Order No. 2023, which presentation is attached as Appendix A.
 - The NYISO has modified aspects of the compliance plan presented on December 14, 2023 in response to stakeholder feedback. Any such modifications have/will be identified in upcoming meetings.
- The NYISO has posted draft tariff language to implement this comprehensive plan starting on February 5, 2024.
- On February 6, 2024, the NYISO walked through key conceptual changes from the December 14, 2023 OC Presentation and the structure of the draft tariff posted with the meeting materials.
- This presentation highlights conceptual changes from the February 6, 2024 IITF Meeting and flags corresponding revisions to related tariff sections

OATT Attachment HH Tariff Revisions

(revised or new indicated in red)

New OATT Attachment HH Structure

- 40.1 – Definitions
 - Consolidated definitions from Attachments S, X, and Z and Order No. 2023
 - Revised Definitions and added New Terms (e.g., Site Control, Regulatory Limitation)
- 40.2 - Effective Date, Scope, and Application of Standard Interconnection Procedures
 - New rules and rules from Att. X 30.2 and Att. S 25.10
- 40.3 - Transition Rules
 - New rules and rules from Att. X 30.5
 - Clarified that removal of demonstration of Regulatory Milestone within 6 months of IA tender for all prior Class Year projects
 - Provided Transition Rules for Small Gens Facility Studies and Small and Large Gen Feasibility and SIS/SRIS studies
 - Provided rules for treatment of EDS projects in Transition Cluster
- 40.4 - Pre-Cluster Study Process Procedures (i.e., Heatmap and Pre-Application Report)
 - New rules and rules from Att. Z 32.1 and Order No. 2023 Pro Forma 6.1
- 40.5 - Cluster Study Process Start Date/ Application Window/ Interconnection Requests/ Interconnection Service Options
 - New rules and rules from OATT 30.3 and Order No. 2023 Pro Forma 3.4.2
 - Revised Cluster Study Start Date calculation
 - Revised validation timing
 - Clarified deficiency response time for TO-specific data
 - Added additional detail regarding Site Control Demonstration

New OATT Attachment HH Structure (cont.)

- 40.6 - Queue Position/ Modification/ Withdrawal/ Withdrawal Penalties
 - New rules and rules from OATT 30.3 and 30.4
 - Revised COD Extension Rules
- 40.7 - Customer Engagement Window (including Cluster Study Project List, Scoping Meeting, and Physical Infeasibility Screening)/ Phase 1 Entry Decision Period
 - New rules and rules from OATT 30.3 and Order No. 2023 Pro Forma 3.4.5.
 - Clarified end date of the Customer Engagement Window
- 40.8 - Affected Systems within New York Control Area and External Affected Systems
 - New rules and rules from OATT 30.3 and Order No. 2023 Pro Forma 3.6 and 9.
 - Provided details on procedures for when NYISO is Affected System
- 40.9 - Cluster Study Overview/ NYISO Minimum Interconnection Standard/ NYISO Deliverability Interconnection Standard/ Cluster Study Cost Allocation Rules
 - New rules and rules from Att. X 30.3 and Att. S 25.1, 25.2, 25.4 and 25.5
- 40.10 - Phase 1 Study/ Existing System Representation/ Annual Transmission Baseline Assessment / Phase 1 Study Scope and Procedures/ Phase 2 Entry Decision Period
 - New rules and rules from Att X 30.8 and Att. S 25.5, 25.6

New OATT Attachment HH Structure (cont.)

- 40.11 - Phase 2 Study / Annual Transmission Reliability Assessment
 - New rules and rules from Att X 30.8 and Att. S 25.5, 25.6
- 40.12 - Cluster Baseline Assessment (CBA) and Cluster Project Assessment (CPA) (formerly “ATBA and ATRA”)
- 40.13- Cluster Study Deliverability Study
 - Rules from Att. S 25.7
- 40.14 - Additional SDU Study
 - Rules from Att. S 25.5
 - Changes to scope of Additional SDU Study and clarification re: timing of Additional SDU Study with subsequent clusters (for discussion today, not reflected in posted draft tariff revision)
- 40.15 - Final Decision Period/ Additional SDU Study Decision Period
 - New rules and rules from Att. S 25.8
 - Revised to require projects in an Additional SDU Study to make a decision on SUFs in the Phase 2 Study (i.e. cannot defer ERIS decision until end of Additional SDU Study)
- 40.16 - Security Forfeiture; Future Cost Responsibility
 - Rules from Att. S 25.8
- 40.17 - Headroom Rules
 - Rules from Att. S 25.8

New OATT Attachment HH Structure (cont.)

- **40.18 - CRIS Retention, Expiration, Transfer and External CRIS (formerly “Going Forward Rules”)**
 - Rules from Att. S 25.9
- **40.19 - Expedited Deliverability Study Procedures**
 - Rules from Att. S 25.5
- **40.20 - Engineering & Procurement Agreement**
 - Rules from Att. X 30.9
- **40.21 - Standard Interconnection Agreement (IA)/ Standard Upgrade Construction Agreement/
Standard Multiparty Upgrade Construction Agreement**
 - New rules and rules from Att. X 30.11
- **40.22 - Construction of Connecting Transmission Owner’s Attachment Facilities, System Upgrade
Facilities, and System Deliverability Upgrades**
 - Rules from Att. X 30.12

New OATT Attachment HH Structure (cont.)

- 40.23 - Fast Track Process
 - Rules from Att. Z 32.2
- 40.24 - Miscellaneous
 - Rules from Att. X 30.13
 - **NYISO consolidated the description of study cost requirements and invoicing rules (previously in Sections 40.6, 40.7, 40.10 and 40.15) into section 40.24.3**
 - **Description of invoicing for Study Costs and Withdrawal Penalties and description of refunds of deposits are detailed in 40.24.3**
 - **Revised study cost allocation for studies performed under Attachment HH other than the Cluster Study (EDS, Facility Modification studies, Fast Track Study/Supplemental Screens, and Affected System Studies)**

New OATT Attachment HH Structure (cont.)

- Appendices (**revised or new indicated in red**)
 - **Interconnection Request Form [Rules from Att. X Appendix 1];**
 - Pre-Application Request Form and Pre-Application Report Template [Rules from Small Gen Pre-Application Materials];
 - **CRIS-Only Request Form**
 - Two-Party and Multiparty Affected System Study Agreements [Rules from FERC Order 2023 Pro Forma Appendices 9 and 10];
 - Facility Modification Form and Terms and Conditions [Rules from Att. X Appendix 3];
 - **Expedited Deliverability Study Agreement [Rule from Att. S Appendix 2];**
 - **Allocation of Overage Cost Example [Rules from Att. S Appendix 1];**
 - Pro Forma Standard Interconnection Agreement [Rules from Att. X Appendix 4];
 - Standard Upgrade Construction Agreement and Standard Multiparty Construction Agreements [New]; and
 - **Certification Code and Standards [Rule from Att. Z Appendix 3];**
 - **Certification of Facility Equipment Packages [Rule from Att. Z Appendix 4];**
 - **10k Inverter Process [Rules from Att. Z Appendix 5];**
 - Fast Track Request Form
 - Additional appendices.

Key Conceptual Changes and Additional Details

COD Extensions and Demonstrations of Reasonable Progress

COD Extensions and Demonstrations of Reasonable Progress

- Extension of CODs beyond the 4-years post-Cluster Study completion will be permitted only if the following conditions are satisfied:
 - Demonstration of either (1) **technology-specific reasons or reasons beyond the Interconnection Customer's control** or (2) reasonable progress notwithstanding the delay (**detailed further on the following slide**);
 - Schedule agreed upon by the CTO that demonstrates that its project would meet the extended COD;
 - Confirmation by the NYISO (**per standard modification review criteria**) that extending the COD would not have a material adverse impact on other projects that may be relying on the project's upgrades; and
 - Confirmation by the NYISO and CTO that cost estimate update is not required or if required, that a cost estimate update is completed and Interconnection Customer agrees to and posts security for increases in cost estimates for SUFs, SDUs and CTO AFs.
 - The need and timeframe for any cost estimate update will be made at the time the COD extension request is made and considering the requested time frame.

COD Extensions and Demonstrations of Reasonable Progress

- **NYISO proposes to allow COD extensions required due to technology-specific reasons or reasons beyond the Interconnection Customer's control upon demonstration (via an Officer certification):**
 - that its Facility cannot meet the timeframe due to its technology type or due to the sequencing of work on the transmission or distribution system that is beyond its control (e.g., unavailability of required system outages) and
 - that its project is still progressing to the extent possible
- **NYISO proposes that Reasonable Progress may be demonstrated (via an Officer certification) of the following:**
 - that it has made reasonable progress in the development of its project against milestones set forth in the Interconnection Agreement or in the milestone schedule that it has agreed upon with the Connecting Transmission Owner that meets the requested extended Commercial Operation Date
 - that it has met a critical milestones (e.g., its completion of engineering design, major equipment orders, or commencement and continuation of construction of the Facility and associated upgrades)
 - To discuss with Stakeholders examples of critical milestones commensurate with above examples

Site Control

Interconnection Request – Site Control Definition

Proposed definition below revises the existing Site Control definition in ISO’s interconnection procedures and includes changes to the *pro forma* definition in Order No. 2023. (no changes from 2/6/2024 meeting materials)

Gray reflects NYISO’s current Site Control Definition in the OATT. Blue reflects pro forma revisions in Order 2023. Red reflects NYISO’s proposed revisions to Site Control definition.

~~Site Control shall mean documentation reasonably demonstrating~~ the exclusive land right ~~sufficient~~ to develop, construct, operate, and maintain the ~~Large~~ Generating Facility over the term of expected operation of the Generating Facility. Site Control may be demonstrated by documentation establishing: (1) ownership of, a leasehold interest in, or a right to develop a site ~~for the purpose of constructing~~ of sufficient size to construct and operate the ~~Large~~ Generating Facility ~~or Class Year Transmission Project~~; (2) an option to purchase or acquire a leasehold site of sufficient size to construct and operate the ~~Large~~ Generating Facility ~~or Class Year Transmission Project~~ for such purpose; or (3) an exclusivity or other business relationship between any other documentation that clearly demonstrates the right of Interconnection Customer Developer and the entity having the right to sell, lease or grant Developer the right to possess or ~~to exclusively~~ occupy a site for such purpose. of sufficient size to construct and operate the ~~Large~~ Generating Facility ~~or Class Year Transmission Project.~~ The ISO will maintain acreage requirements and other applicable parameters for each facility type on its OASIS or public website.

Interconnection Request – Site Control

- **Demonstration of full Site Control for Generating Facility with Interconnection Request**
 - Documentation must demonstrate Site Control for the term of expected operation of the Generating Facility (i.e., at least 10 years)
 - Re-confirmation of full Site Control with project modifications or COD extensions
 - Developer not required to demonstrate Site Control for generator tie line or POI facilities
- **Elimination of the option to post a deposit in lieu of Site Control unless the Interconnection Customer can demonstrate a "regulatory limitation" making it practically infeasible to obtain Site Control within the required time frame.**
- **For co-located generating facilities on the same site and behind the same Point of Interconnection, the Interconnection Customer must demonstrate Site Control adequate for all proposed facilities.**
- **Interconnection Customer cannot submit the same land for multiple Interconnection Requests, unless the site is large enough to accommodate multiple generating facilities.**

Interconnection Request– Site Control

■ Technology Acreage Requirements

- Interconnection Customer must demonstrate that the area covered by the Site Control can reasonably accommodate the development of the proposed generating facility based on the identified technology and equipment in the Interconnection Request and any known limitations with the parcel (e.g., wetlands or exclusions to the Interconnection Customer’s right to develop the property).
- Per Order No. 2023, Transmission Providers have flexibility to establish appropriate technology-specific acreage requirements for generating facilities but must publicly post the requirement.
- The NYISO will continue to use general acreage guidelines as a starting point, but considers the information submitted by the Interconnection Customer based on the specifics of the facility or proposed technology.

Preliminary* Technology Acreage Requirements Table

Technology Type	Acres/MW
Solar	2.8 acres/MWdc for fixed tilt PV plants 4.2 acres/MWdc for tracking plants
Wind (Land Based)	15 acres/MWac
Offshore Wind	50 acres/MWac
Battery Energy Storage	0.01 acre/MWhac
Conventional and Other Technology	Interconnection Customers must submit (1) a site plan and equipment layout signed and stamped by a licensed Professional Engineer (PE); and (2) Detailed narrative that explains why the site will accommodate the Generating Facility on land that is below the minimum acreage

NYISO is developing site control requirements for transmission projects

- Acreage and other applicable site control parameters will be included in NYISO procedures; Interconnection Customers will have the opportunity to review and comment on requirements as part of the manual/tech bulletin update process.
- If Site Control does not meet the above acreage requirements, then the Interconnection Customer will need to include additional documentation with its IR submission (see the following slide).

Interconnection Request– Site Control

Additional Requirements for Projects that Do Not Meet the Minimum Acreage Requirements

- In addition to all general requirements and supporting documents for site control, an Interconnection Customer must include with its IR submission:
 - Detailed narrative that explains why the site can accommodate the Generating Facility on land that is below the minimum acreage requirement
 - Site plan and equipment layout (including any limitations on the site - wetlands, unusable land, spacing, setbacks, etc.) **signed and stamped** by a licensed Professional Engineer (PE)

Interconnection Request– Site Control

■ Document Requirements

- A legally binding instrument, fully executed, that demonstrates the following:
 - The Interconnection Customer has the right to develop specific fuel source
 - Statement of exclusivity
 - Permission to use the site
 - Clearly identifies acreage of parcel
 - Term of at least 10 years
- Accepted documents:
 - Title, Deed, or Tax Bill
 - Lease Agreement (includes BOEM lease for offshore wind projects)
 - Option to Lease or Option to Purchase
 - Easement
 - Right of Way
- If document is not from the NYISO's accepted listed, language in the document must demonstrate Interconnection Customer has the rights described above.

Interconnection Request– Site Control

General Submission Requirements

- **Interconnection Customer must provide documentation that demonstrates Interconnection Customer has the rights to develop specific fuel source and clearly sets forth the acreage.**
- **The party's name listed on the documentation to demonstrate site control should match the name of the Interconnection Customer on record with the NYISO.**
 - In situations where the name differs, the Interconnection Customer is responsible for providing additional documentation explaining the corporate relationship such as, an SEC filing, document on file with the applicable secretary of state, other official corporate document, or a purchase sale agreement.
- **If the same Site Control is being used for facilities under different Interconnection Requests, Interconnection Customers must also explain how all proposed facilities will be situated within the area (mutually exclusive alternatives are not permitted)**
- **Interconnection Customer must provide detailed site plan and equipment layout detailing the conceptual design of the proposed facility and how it is situated within the area that is covered by the Site Control and available for the Interconnection Customer's use. Include any wetlands, unusable land, spacing, setbacks, etc.**

Interconnection Request– Site Control

Document Requirements cont.

- All Interconnection Customers must submit the following for site control:
 - Legally binding instrument from the “Accepted Documents” list
 - **A signed attestation indicating:**
 - the amount of acreage covered by the site control materials provided by the Interconnection Customer; and
 - One of the following representations:
 - The acreage meets the minimum requirements listed in the Technology Acreage Requirements Table; or
 - The acreage does not meet the minimum requirements listed in the Technology Acreage Requirements Table and the interconnection customer will satisfy the additional requirements for projects that do not meet minimum acreage requirements
 - Site Plan Map that depicts:
 - Project Boundaries
 - Boundaries of Parcel(s) and/or total lease area
 - POI
 - Proposed Tie-Line and Collector Routes
 - Interconnection Facilities
 - Any known site limitations such as wetlands, unusable land, spacing, setbacks, etc.

Site Control - Regulatory Limitations

- **Per Order 2023, a regulatory limitation is generally a federal, state, Tribal, or local law that makes it practically infeasible to obtain site control within the time frame detailed in the pro forma LGIP.**
- **Order 2023 provides limited guidance on what qualifies as a regulatory limitation, but FERC gives Transmission Providers discretion to define regulatory limitation applicable to the Transmission Provider's territory.**

Site Control - Regulatory Limitations

- **To demonstrate a regulatory limitation, Interconnection Customer must submit:**
 - a signed affidavit from an officer of the company indicating that Site Control is unobtainable due to regulatory limitations as the term is defined by the NYISO; and
 - documentation sufficiently describing and explaining the source and effects of such regulatory limitations, including a description of any condition that must be met to satisfy the regulatory limitations and the anticipated time by which the Interconnection Customer expects to satisfy the regulatory restrictions.
- **An Interconnection Customer with a demonstrated regulatory limitation may submit a deposit in lieu of Site Control.**
 - \$10,000 per MW, subject to a floor of \$500,000 and a ceiling of \$2 million, as established in Order No, 2023.
 - Deposit must be submitted at the same time as submission of the Interconnection Request.
 - Deposit will be held by the NYISO until the Interconnection Customer can demonstrate full Site Control prior to entering the Cluster Study Phase 2, unless Interconnection Customer provides documentation demonstrating identifiable steps taken to secure the necessary regulatory approvals.
 - Such Interconnection Customer must demonstrate full Site Control within 180 calendar days of the effective date of the LGIA. Otherwise, the LGIA may be terminated, and the Interconnection Customer could be subject to forfeiting its security.
 - The deposit is refundable but cannot be applied toward interconnection studies or withdrawal penalties.
- **Order 2023 allows Transmission Providers to develop the specific definition and to update the definition over time as relevant federal, state or local laws change.**

Site Control - Regulatory Limitations

- NYISO proposes to define a regulatory limitation as “a federal, state, Tribal, or local law, other than permitting and siting requirements, that makes it infeasible to obtain Site Control prior to an Interconnection Customer's submission of the Interconnection Request as set forth in ISO procedures.”
- A regulatory limitation is not intended to include permitting or siting issues.
- An example of a regulatory limitation
 - Projects experiencing delays in obtaining exclusive land rights for site control on Tribal lands
- Examples of what is not considered a regulatory limitation
 - The BOEM-administered auction
 - Moratoriums (local or regional) on development of certain technology projects – while a moratorium prevents a developer from obtaining zoning approvals for a project, it does not prevent a developer from obtaining land rights

Energy Storage Operating Assumptions

Energy Storage Operating Assumptions

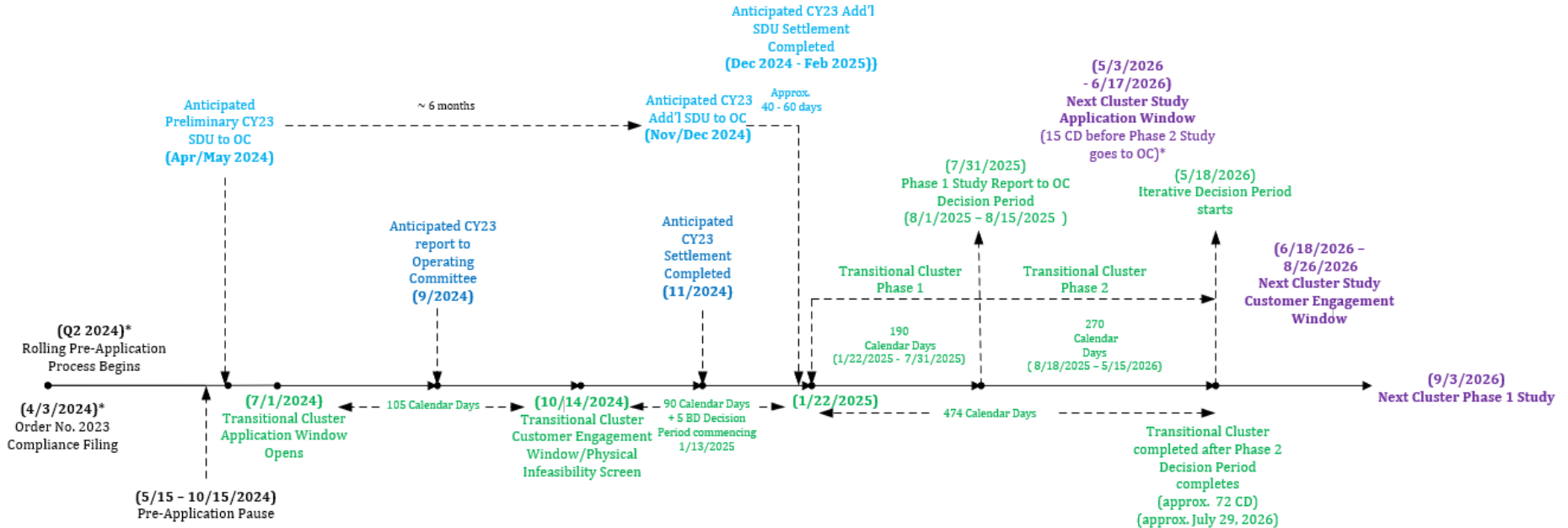
- Stakeholders have raised concerns on NYISO's objection to incorporating Developer-proposed operating assumptions in interconnection studies
- In response, NYISO proposes to use the following as Normal Operating Procedures to mitigate reliability impacts triggered by storage, solar and wind projects:
 - Allow developers of Storage, Solar, and Wind projects causing overloads on non-secured transmission elements operated at 100+kV and for transformers where the low side connection is operated at 100+ kV to elect to move forward without correcting thermal overloads in MIS.
 - When the resources are integrated in the market systems, NYISO will follow the process outlined in the T&D manual to potentially secure more facilities in the market systems.
 - If the NYISO is unable to add an overloaded element as secured because it does not meet the criteria outlined in the T&D manual any limitations in output (or withdrawal) of the resource to secure the thermal overload the loss of production would be the developer.

Transition Timeline and Subsequent Cluster Study Start Date

Transition Overview

- NYISO proposes to immediately implement the new Attachment HH Interconnection Procedures as of April 4, 2024.
- Interconnection Requests submitted after April 4, 2024 will be subject to the new Cluster Study Process.
- The Application Window for the initial Cluster Study – the Transition Cluster Study – will open July 1, 2024.
- During the 3-month window between the effective date of the new Interconnection Procedures and the Transition Cluster Application Window, NYISO start accepting Pre-Application Requests and will be continuing pending studies as further detailed on slide 37.
- The proposed schedule for the Transition Cluster Study and commencement of the subsequent Cluster Study are depicted on the following slide.

Transition Process Timeline



*Proposed Cluster Start Date calculation is 15 CD prior to scheduled OC review of Phase 2 Report

Additional SDU Study

Additional SDU Study for Transitional Cluster

■ For Transition Cluster

- Proceed as normal and terminate the Additional SDU Study if it hasn't completed within 10 BD prior to the Transition Cluster Phase 1 Start Date

■ Going forward Clusters

- Retain Additional SDU Study only for Highway and Other Interface SDUs (fold Byway SDUs into regular Cluster Study Phase 2)
- NYISO to provide tariff revisions to Section 40.14

■ Decision Period

- Interconnection Customer in an Additional SDU Study cannot defer its ERIS decision (acceptance/rejection of SUF costs) until the Additional SDU Study Decision Period – must make a decision in the Cluster Study Phase 2 Decision Period

Treatment of Pending Attachment S, Attachment X and Attachment Z Studies

Treatment of Pending Attachment S, X and Z Studies

- **Class Year Study and Expedited Deliverability Study**
 - No change to the NYISO's proposal regarding the treatment of the Class Year 2023 Study
 - **Expedited Deliverability Study**
 - EDS 2023-02 is currently proceeding to OC approval
 - If the next EDS (EDS 2024-01) commences after the effective date of the new Attachment HH, any project that wishes to enter must have either completed a Class Year Study, Cluster Study or Small Gen Facilities Study
 - If the next EDS (EDS 2024-01) commences prior to the effective date of the new Attachment HH, Small Gen projects that may enter under the existing rules (with only a Small Gen SIS) will be withdrawn from the EDS 2024-01 after the effective date of the new Attachment HH if they don't have a completed Small Gen Facilities Study

Treatment of Pending Attachment S, X and Z Studies

- **Attachment X and Z Studies: FES, SIS, SRIS and Small Gen Facilities Study:**
 - Continue pending studies through end of Application Window using Reasonable Efforts
 - Study deemed “pending” as of the effective date of the new Attachment HH if (1) it has satisfied all requirements for commencement of the applicable study (including confirmation of required technical data) and (2) the short circuit cases have been completed and provided to the Connecting/Affected Transmission Owner(s)
 - FES, SIS and SRIS terminate upon the project entering the Transition Cluster
 - Small Gen Facilities Studies terminate at the end of the Application Window (these projects can enter the Application Window as a Continent Project)

Affected Systems Studies

Affected System Studies

- **When NYISO is identified as an Affected System of a project in a neighboring RTO/ISO, NYISO will perform 2-part study:**
 - Part 1: to identify if there are any impacts to the NYS Transmission System that require an upgrade
 - Part 2: will be the actual identification of any required upgrades (Affected System Network Upgrades), and associated cost estimates
- **Study timeline of 300 Calendar Days**
 - Order No. 2023 provides for 150 Calendar Days for Affected System Studies (System Impact Study equivalent)
 - NYISO's proposal incorporates into an Affected System Study analyses similar to both a System Impact Study and Facilities Study and requires timeframes to perform comparable to Order No. 2023 timeline for performance of such studies.

Affected System Studies, cont.

- **Study Deposit of \$100,000**
- **Require Interconnection Customer to accept cost allocation and post security consistent with Decision Period rules at the end of Phase 2 study process**
 - **Once an Interconnection Customer accepts cost allocation and posts security, its upgrades will be included in subsequent base cases**
 - **Interconnection Customer's Security will be subject to same security rules and cost responsibility rules as Security posted in the Cluster Study Decision Process**

IEEE 2800 PRR 151 Attestations

IEEE 2800 PRR 151 Attestation

- On February 9, 2024, the New York State Reliability Council approved Proposed Reliability Rule (PRR) 151, which adopted a new Reliability Rule B.5 ([RR-#151-2-12-2024.pdf\(nysrc.org\)](#)) and associated Procedure for Application Document ([RR #151 Procedure Document 2-11-2024](#)).
- As required by Reliability Rule B.5, the NYISO will require that an officer for each Facility constituting an Inverter-based Resource (IBR) of greater than 20 MW, after conducting due diligence, complete a form attesting to the following two statements at the time of submitting an Interconnection Request:
 - The proposed Facility will be designed to be in compliance with the mandatory requirements of IEEE 2800-2022, as amended by "NYSRC Procedure for Application of IEEE 2800-2022 Standard for Large IBR Generating Facilities for the New York Control Area," and
 - The models and data provided for the proposed Facility for use in NYISO's Interconnection Studies accurately simulates the performance of their compliant IBR plant.
- This attestation will be mandatory for all Interconnection Requests for facilities seeking to participate in the Transition Cluster Study and all subsequent Cluster Studies.
- If an Interconnection Customer is unable or unwilling to complete this Attestation, they are advised to contact the New York State Reliability Council (NYSRC) to request an Exception to Reliability Rule B.5.
- The NYISO will not accept an Interconnection Request for an IBR greater than 20 MW in the absence of a completed Rule B.5 Attestation or an Exception to Rule B.5 granted by the NYSRC.

Next Steps

Next Steps

- **Future Stakeholder Meetings:**
 - March 1 (IITF)
 - Mid-March (IITF), to be scheduled
 - Late March (IITF), to be scheduled, if needed
- **February - March 2024**
 - Additional details, clarifications, updates, as needed based on stakeholder feedback
 - Review of incremental tariff revisions
 - Stakeholder comment deadline on materials posted for February 6 and February 16 IITF: March 1, 2024
- **Compliance Filing Deadline: April 3, 2024**

Questions?

Roles of the NYISO

- **Reliable operation of the bulk electricity grid**
 - Managing the flow of power on 11,000 circuit-miles of transmission lines from hundreds of generating units
- **Administration of open and competitive wholesale electricity markets**
 - Bringing together buyers and sellers of energy and related products and services
- **Planning for New York's energy future**
 - Assessing needs over a 10-year horizon and evaluating projects proposed to meet those needs
- **Advancing the technological infrastructure of the electric system**
 - Developing and deploying information technology and tools to make the grid smarter

Our Mission & Vision



Mission

Ensure power system reliability and competitive markets for New York in a clean energy future



Vision

Working together with stakeholders to build the cleanest, most reliable electric system in the nation