

Order No. 2023/2023-A Compliance Update

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Transmission Planning Advisory Subcommittee (TPAS)

April 1, 2024

Agenda

- **High Level Overview of Order No. 2023-A**
- **Updated Compliance Timeline**
- **Updated Transition Cluster Study Timeline**
- **Next Steps**

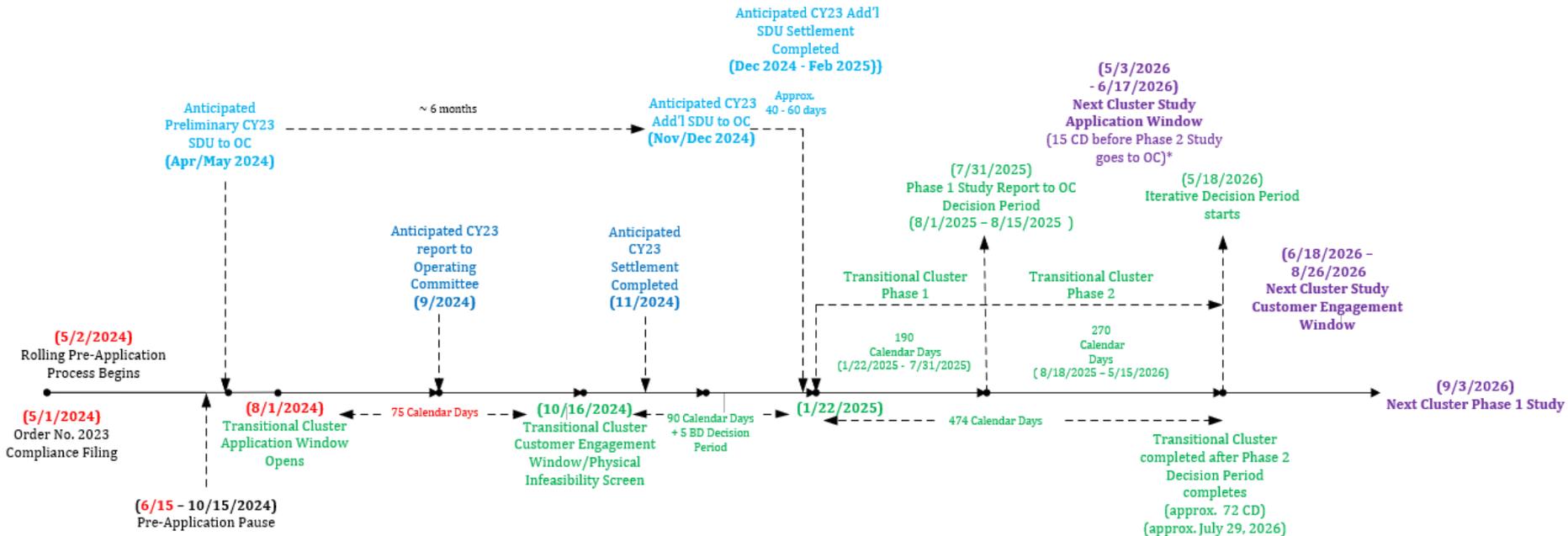
High Level Overview of Order No. 2023-A

- Order No. 2023-A was approved unanimously on March 21, 2024. The order contains over 500 pages of regulatory text, plus another 500+ pages of pro forma tariff and agreement language.
- Order No. 2023-A broadly upheld the Commission’s initial rulings while offering some limited additional clarifications.
 - The Commission upheld its decisions to eliminate the “reasonable efforts” standard and to impose penalties for late studies, including on ISOs/RTOs. It also rejected challenges to specific elements of the penalty regime.
 - FERC also reaffirmed that it would not accept proposals to enhance study delay penalty reporting requirements as an alternative to adopting financial penalties. The NYISO had planned to include such a proposal in its compliance filing. This finding makes it necessary for the NYISO to develop an alternative approach and include a penalty proposal in its compliance filing.
 - The Commission denied rehearing on certain issues that the NYISO raised within the context of its specific interconnection and market rules (e.g., operating assumptions for energy storage resources), but the Commission reiterated that NYISO could justify required variations as part of the compliance filing.
 - There were numerous minor clarifications or technical compliance details which the NYISO is reviewing to determine whether they necessitate modifications to the current compliance proposal and tariff revisions.
- Throughout the order, the Commission clarified its openness to allowing independent entity variations on various topics.
- Order No. 2023-A extended the Order No. 2023 compliance filing deadline until 30 days after Order No. 2023-A’s publication in the Federal Register.

Updated Compliance Timeline

- **NYISO plans to use part of the extension granted by the Commission but maintain the overall Transition Cluster Study timeline**
 1. File complete Order 2023/2023-A filing on May 1, 2024.
 2. Request an effective date of May 2, 2024.
 3. Push back start of Pre-Application process and Transition Cluster Study process by one month
 - Pre-Application process to start May 2, 2024
 - Transitional Cluster Study Application Window to open August 1, 2024
 4. To maintain overall Transition Cluster timeline, shorten Transition Cluster Application window by 30 days (from 105 days to 75 days).
 - This is still 30 days longer than the normal 45-day application period.

Updated Transition Cluster Timeline (updated dates in red)



Next Steps

Next Steps

- **Interconnection Issues Task Force (IITF) Meeting: April 15, 2024**
 - Stakeholder presentation with proposal modifications, penalty proposal, and incremental tariff revisions
 - Opportunity for Stakeholder comment on incremental revisions
- **Compliance Filing: May 1, 2024**

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

Questions?