

Tech Bulletins- Transition Cluster Study Overview and COD Extension Requests

Andrew Zielinski

Manager, Interconnection Coordination

TPAS/ESPG

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Agenda

- **Transition Cluster Study Technical Bulletin**
- **COD Extension Request Technical Bulletin**
- **Next Steps**

Transition Cluster Study Technical Bulletin

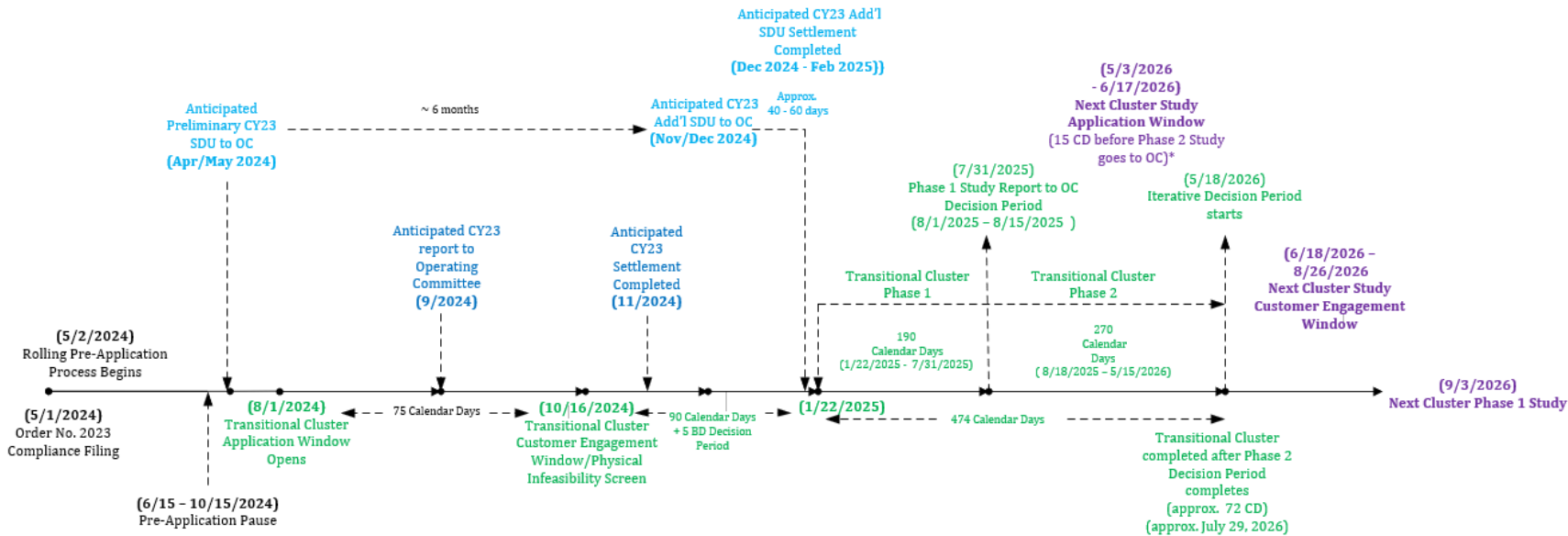
Transition Cluster Study Overview

- **Order No. 2023 provides for a 360-day transition cluster that precedes the initial "standard" Cluster Study.**
 - This would delay the commencement of the new Cluster Study process.
- **NYISO proposes to transition directly into the new Cluster Study process rather than awaiting the end of a year-long transitional study**
 - As depicted on the following slide, the initial Transitional Cluster Study Application Window will allow Interconnection Customers additional time to enter this initial study (75 days vs. 45 days).
 - The validation period will be extended from 10 Business Days to 15 Business Days for the initial Transitional Cluster Study Application Window.
 - In response to Stakeholder feedback, NYISO revised the Compliance Proposal to provide Interconnection Customers with more than a single opportunity for curing deficiencies within the Application Window.
 - The Customer Engagement Window/Physical Infeasibility Screen will also be extended by 20 Calendar Days for purposes of the transitional process (90 Calendar Days vs. 70 Calendar Days).
 - The Transitional Cluster Study will otherwise follow the same process with the same timelines as the "standard" new Cluster Study process.

Transition Overview

- NYISO proposes to immediately implement the new Attachment HH Interconnection Procedures as of May 2, 2024.
- NYISO submitted its compliance filing on May 1, 2024, and requested an effective date of the proposed tariff revisions of May 2, 2024.
- The Application Window for the initial Cluster Study – the Transition Cluster Study – will open August 1, 2024.
- The proposed schedule for the Transition Cluster Study and commencement of the subsequent Cluster Study are depicted on the following slide.

Transition Cluster Timeline



Application Window

Application Window - Overview

- Interconnection Requests are permitted anytime during the 75-day window for the Transition Cluster Study Process
- Single POI per Interconnection Request unless:
 - Project is a Class Year Transmission Project or Cluster Study Transmission Project
 - Project is a Generating Facility interconnecting via two kV levels in the same Capacity Region
- Projects that are alternatives cannot be evaluated in the same Cluster Study
- CRIS-only projects must submit a CRIS-Only Request during the Application Window but will have a lower application fee (\$5,000) and study deposit (\$50,000).

Interconnection Request Requirements

1. Non-refundable application fee \$10,000 (cash only) (\$5,000 for CRIS-only projects):
75% allocated to NYISO and 25% Connecting TO/Affected TOs
2. Study Deposit (cash, Letter of Credit, **or surety bond**):

Size of Proposed Generating Facility Associated with Interconnection Request	Amount of Deposit
< 80 MW	\$100,000
≥ 80 MW < 200 MW	\$150,000
≥ 200 MW	\$250,000

Study Deposit for CRIS-only projects is \$50,000.

Interconnection Request Requirements, cont.

3. Conceptual one-line diagram that includes:

- The Project name, and the Interconnection Customer name on the diagram;
- The facility address (specific location – coordinates or closest street address);
- The number of inverters or generator units (type, nameplate rating MW and MVA), and configuration of the facility;
- The facility's electrical components (*i.e.*, generation, transformers (GSU, PSU, current transformer, and potential transformers), breakers, switches, cables/lines/feeders, compensation, FACTs, auxiliary load, buses, etc.) as described in the modeling data form;
- The capability and voltage levels of the electrical components, their connection to each other and to the New York State Transmission System or Distribution System;
- The Point of Interconnection (name of the substation name (specify the bus) or transmission/distribution line name and number);
- References to other diagram sheets if there is more than one diagram sheet (*i.e.*, use references to indicate how the diagrams are interconnected).
- Acronyms used in the conceptual breaker one-line diagram should follow ANSI Standard Device Numbers & Common Acronyms.

Interconnection Request Requirements, cont.

4. **Completed Interconnection Request must also include a project layout that shows general project layout and location of project in relation to proposed POI, including specific POI**
 - Must indicate voltage level, address, coordinates, location in relation to facility
 - Interconnection Customer does not need to specify breaker position in a substation
5. **Workable individual project models (*e.g.*, short circuit, steady-state, and stability)**
6. **Attestations (for Generating Facilities greater than 20 MW) required by the final, approved NYSRC Reliability Rule B.5 (~~currently~~ PRR 151) establishing minimum interconnection standards for Inverter Based Resource (IBR) Generating Facilities based on IEEE Standard 2800-2022**
7. **Demonstration of Site Control**

Transmission-Owner-Specific Data

Interconnection Customers must separately provide any required Connecting Transmission Owner/Affected Transmission Owner-specific data for purposes of Phase 1 Study within 10 Business Days of the validation of their Interconnection Request.

Cluster Study Agreement

- **NYISO will circulate an executable version of the Cluster Study Agreement to the Interconnection Customer, Connecting Transmission Owner, and any identified Affected Transmission Owner(s)/Affected System Operator(s) as soon as practicable after validating the Interconnection Request/CRIS-Only Request in the Application Window.**
 - **If the validation occurs in the Customer Engagement Window, the NYISO will provide the executable version of the agreement within 10 Business Days for execution.**
- **The parties to the agreement must then execute the agreement within 10 Calendar Days.**
- **If NYISO subsequently identifies additional or other Connecting Transmission Owner(s), Affected Transmission Owner(s), or Affected System Owner(s), the parties will amend the agreement to include these parties.**
- **NYISO also amended Interconnection Request/CRIS-Only Request form for officer/authorized person for Interconnection Customer to attest with the submission of the request form that its submission is accurate and complete, that the Interconnection Customer acknowledges that it will be required to execute the Cluster Study Agreement, and that it acknowledges and agrees to be responsible for its study costs, including study costs incurred prior to the full execution of the Cluster Study Agreement.**

Interconnection Request - Validation

- Validation on a rolling basis for Interconnection Requests submitted during window
- **Within 10 Business Days* of receipt of Interconnection Request**
 - NYISO reviews Interconnection Request to identify the Connecting TO and Affected TOs
 - NYISO notifies Connecting TO and Affected TOs it is aware of via Interconnection Portal
 - Connecting TO confirms (via portal) it is the Connecting TO and confirms Affected TOs
 - NYISO confirms receipt of payment of application fee and study deposit
 - NYISO acknowledges receipt of the facility model
 - Interconnection Customer must address any deficiencies with the models prior to the Scoping Meeting in the Customer Engagement Window
 - NYISO notifies Interconnection Customer that Interconnection Request is valid or identify deficiencies
- *** 15 Business Days for validation for the Transitional Cluster Study to account for administering new process and to address potentially significant number of Interconnection Requests**

Interconnection Request - Deficiencies

- An Interconnection Customer must cure Interconnection Request deficiencies within 10 Business Days (15 Business Days for Transition Application Window) of its receipt of a deficiency notice from the NYISO, but no later than the end of the Application Window.
- Interconnection Requests submitted with less than 10 Business Days prior to the end of the Application Window may not have the opportunity to cure deficiencies. (NYISO is afforded 10 Business Days to validate Interconnection Requests.) This period will be 15 Business Days for the Transition Cluster Study.
- Interconnection Customer can continue to cure deficiencies throughout the duration of the Application Window.
- Cure process will not be an iterative process; NYISO will identify deficiencies in its first review of the application and Interconnection Customer must address all deficiencies with each cure response submittal. NYISO will not separately validate each submission for individual deficiencies.
- Notwithstanding this validation, the Interconnection Customer must also satisfy the requirements for submitting and addressing deficiencies for the Facility model and any TO-specific technical information.

Interconnection Request – Deficiencies, cont'd

- Interconnection Customers will have 10 Business Days to cure identified deficiencies (15 Business Days for the Transition Cluster).
- NYISO will review the submitted information to cure the identified deficiencies within 10 Business Days (15 Business Days for the Transition Cluster) and notify the Interconnection Customer of any additional deficiencies.
- This process will continue until the close of the Application Window (i.e., Interconnection Customer may have more than one cure opportunity, depending on the timing within the Application Window).
- NYISO will continue its validation process in the start of the Customer Engagement Window for applications submitted late in the Application Window.
- Interconnection Customers must satisfy subsequent requests for additional information needed to address incomplete data, errors, or additional information required for the ISO's or Transmission Owners' performance of their responsibilities in Attachment HH within 10 Business Days.

COD Extension Requests Technical Bulletin

COD Extensions

- **COD extensions:**

- Current rule allows a project's COD to be extended up to 4 years from completion of Class Year Study.
- An Interconnection Customer may request a COD extension beyond the 4 years, if certain components are met.

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:
 - Requested extension is on or before May 2, 2028, or developer demonstrates either:
 - 1) technology-specific reasons or sequencing of work reasons beyond the Interconnection Customer's control that necessitate the extension and project progressing to the extent reasonably possible or
 - 2) project has made reasonable progress; (detailed further on the following slide);
 - Schedule agreed upon by 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.
 - TO can perform limited study as part of cost estimate update to identify replacement equipment if the equipment identified in the applicable interconnection study is no longer available.

COD Extensions and Demonstrations of Reasonable Progress

- NYISO added section 40.6.3.5.1.1, which allows a COD extension for any current project on or before May 2, 2028, subject to the project satisfying the other extension requirements (i.e., agreed upon milestone schedule and any cost estimate update).
- NYISO allows COD extensions required due to technology-specific reasons or sequencing of work 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
- Reasonable Progress may be demonstrated (via an Officer certification) if an IC has met one 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)
 - NYISO inserted additional critical milestones by which developer can demonstrate reasonable progress: (i) "completion of applicable permitting process" and (ii) "application of applicable primary siting permitting process deemed complete"

COD Extensions for Class Year 2019 Projects

- NYISO encourages any Class Year 2019 projects that will not achieve their COD prior to February 2025 and any Small Generating Facilities that are nearing the completion of the four-year period for their COD to consider submitting any requested extension in the near term to ensure the projects will not be withdrawn as the NYISO and TOs will require time to administer the new extension rules, including performing any required cost estimate update.

Next Steps

Next Steps

- Send comments to stakeholder_services_ipsupport@nyiso.com by July 16, 2024
- Training Session for prospective developers and other interested stakeholders:
 - July 12

Questions?

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