

Deliverability Test Methodology Considerations

Thinh Nguyen

Senior Manager, Interconnection Projects

**Electric System Planning Working Group (ESPWG)/ Transmission Planning Advisory
Subcommittee (TPAS)**

January 5, 2026

Agenda

- **Overview of Prior Discussions regarding Challenges with the Deliverability Methodology**
- **Comments from Stakeholders on Deliverability Methodology**
- **Next Steps**
- **Appendix**
 - **Background and Challenges from December 3, 2025 TPAS regarding the Deliverability Test Methodology**

Previous Presentations

- **October 30, 2025, TPAS/ESPWG (Presentation)**
 - **Deliverability Test Methodology**
- **December 3, 2025, TPAS/ESPWG (Presentation)**
 - **Deliverability Test Methodology Challenges**

Comments from Stakeholders

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- **Comments discussed at 12/3/2025 TPAS/ESPG**
 - If NYISO intends to utilize the ELCC method, should NYISO consider using the area under ELCC curve (average) rather than the marginal point?
 - Should changes to the deliverability test methodology include changes to SCR assumption?
- **ACE-NY provided comments posted as part of the January 5, 2026 TPAS/ESWPG meeting materials regarding:**
 - Implementation schedule
 - Risk of delays and confusion with SDU costs and impact on project development

Comments from Stakeholders (Cont.)

- **Potomac Economics provided comments posted as part of the January 5, 2026 TPAS/ESWPG meeting materials regarding:**
 - Concerns with the current deliverability test
 - ELCC techniques to determine derating factors
 - Interfaces modeled in the deliverability test
 - Suggested capacity market changes to consider alongside deliverability test improvements

Next Steps

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- **January 2026 - March 2026:** Continue reviewing proposed deliverability methodology changes with stakeholders
- **March/April 2026:** BIC, OC, and MC Approvals
- **April/May 2026:** Board Approval and FERC 205 Filing
- **By Late July 2026:** FERC Order
- **August 2026:** Anticipated Start of Next Cluster Study and Transition Cluster Study Final Decision Period

Questions?

Our Mission and 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



Appendix – Background & Challenges

Background re: Deliverability Test

- Resources must have Capacity Resource Interconnection Service (CRIS) to participate in the NYISO's Installed Capacity market.
- To obtain CRIS, resources are subject to a deliverability test unless excepted from these requirements due to project size ($< 2\text{MW}$).
- The objective of the deliverability test is to determine whether a proposed project is deliverable at its requested CRIS MW throughout the Capacity Region where it is interconnecting.

Background re: Deliverability Test, cont.

- If deemed undeliverable, System Deliverability Upgrades (SDU) are identified and cost allocated to the resource.
- For a resource requiring SDUs to become an Installed Capacity Supplier, or receive Unforced Capacity Deliverability Rights or External-to-ROS Deliverability Rights, the Interconnection Customer must have paid cash or posted Security for any required SDUs in accordance with the rules in OATT Attachment HH.

Challenges with the Current Deliverability Test Methodology

- **Base Case Setup**
- **UCAP Deration Factor of Energy Storage Resources**
- **Highway Deliverability Test**
- **Other Interface No Harm Test**