

# Definition of “Upgrade”

Electric System Planning Working Group  
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# Current NYISO Definition of “Upgrade”

- Order No. 1000 and current Attachment Y define “upgrade” as:

*An improvement to, addition to, or replacement of a part of an existing transmission facility and shall not refer to an entirely new transmission facility.*

- Definition needs clarification
  - “Improvements”, “additions”, and “replacements” will involve new facilities
  - “Entirely new” transmission facility is not clear

# Need for Improved “Upgrade” Definition

- Developers should have more clarity regarding project elements that would be the responsibility of the TO
- NYISO needs a better process to identify project elements that would be the TO’s responsibility
- Lack of definitional detail in could result in project delays

# Alternate “Upgrade” Definitions

- Other regions have defined “upgrade” differently, all Order 1000 compliant:
  - Some regions, similar to NYISO, use the Order 1000 definition
  - Other regions have defined “upgrade” more precisely
- For example, the MISO Tariff definition of “upgrade” is more detailed
  - Definition complies with Order 1000, and has been upheld by FERC
  - However, definition is very detailed, with specific examples

# MISO Definition – Examples

- The MISO Tariff definition includes examples of upgrades, including references to:
  - Increasing line load capability or nominal operating voltage
  - Installing additional plant on/at an existing facility
  - Line relocations
  - Replacing one or more existing components
  - Improving performance or characteristics of existing facilities
  - Converting overhead to underground on the same right-of-way and vice versa
  - Installing additional circuits on existing multi-circuit structures with spare positions
  - Expanding a substation footprint (including to adjacent or nearby land) and installing additional plant within the expanded footprint

# Proposal

- The MISO definition, however, can be streamlined to provide additional clarity for the NYISO process
- Improves process and reduces potential delays caused by confusion over “new” vs “upgrade” facilities
- Provides clarity to NYISO, Developers, and Transmission Owners on types of upgrades eligible for Right of First Refusal

# Appendix: References

- MISO Tariff Attachment FF, Section VIII.A
- FERC Docket ER13-187 (MISO Order 1000 Compliance)