

February 24, 2026

**By Electronic Delivery**

Honorable Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: New York Independent System Operator, Inc., Interconnection Study  
Processing Metrics Informational Filing, Docket No. ER26-\_\_\_\_-000**

Dear Secretary Reese:

The New York Independent System Operator, Inc. (“NYISO”) hereby submits an informational filing containing interconnection study metrics for the NYISO’s Transition Cluster Study Phase 1 Study pursuant to Section 40.9.3.1.3.1 of its Open Access Transmission Tariff (“OATT”).<sup>1</sup>

**I. Communications and Correspondence**

All communications, pleadings, and orders with respect to this proceeding should be directed to the following individuals:

Robert E. Fernandez, Executive Vice President, General Counsel & Chief Compliance Officer

Karen Georgenson Gach, Deputy General Counsel

\*Sara B. Keegan, Assistant General Counsel

\*Raquel M. Parks, Attorney II

New York Independent System Operator, Inc.

10 Krey Boulevard

Rensselaer, NY 12144

Tel: (518) 356-6000

Fax: (518) 356-4702

rfernandez@nyiso.com

kgach@nyiso.com

skeegan@nyiso.com

rparks@nyiso.com

\*Designated to receive service

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<sup>1</sup> Capitalized terms that are not otherwise defined in this filing shall have the meaning specified in Attachment HH of the NYISO OATT and, if not defined therein, in Section 1 of the NYISO OATT.

## II. Discussion

### A. Background

On May 1, 2024, the NYISO submitted proposed revisions to its OATT and its Market Administration and Control Area Services Tariff (“Services Tariff”) (“Compliance Filing”) to comply with the interconnection reforms included in the Commission’s Order Nos. 2023 and 2023-A (collectively, “Order No. 2023”).<sup>2</sup> In particular, the NYISO proposed to establish a Cluster Study Process, which requirements are set forth in new Standard Interconnection Procedures located in Attachment HH to the OATT. In its Compliance Filing, the NYISO submitted certain independent entity variations, including proposed revisions to align the NYISO’s study metrics and informational reporting requirements to its new Cluster Study Process. The Commission accepted the NYISO’s proposed informational reporting requirements in its April 17, 2025, *Order on Compliance*.<sup>3</sup>

The NYISO’s informational reporting requirements are set forth in Section 40.9.3.1 of Attachment HH to the OATT. Section 40.9.3.1.1.1 of Attachment HH to the OATT requires the NYISO, within thirty (30) Calendar Days of the completion of the Phase 2 Entry Decision Period for a given Cluster Study Process, to post on a publicly accessible portion of its website statistics related to the processing of Cluster Studies performed in accordance with this Attachment HH. The Transition Cluster Study’s Phase 1 Study completed on November 18, 2025.<sup>4</sup> In accordance with Section 40.9.3.1.1 of Attachment HH to the OATT, the NYISO posted interconnection statistics related to the Phase 1 Study process on December 17, 2025. As demonstrated by such posting, the duration of the Phase 1 Study process exceeded the scheduled timeframe and, as a result, Section 40.9.3.1.3 of Attachment HH to the OATT requires the NYISO to file a report with the Commission describing:

- (i) the reason(s), as applicable, that the Actual Phase 1 Study Timeframe exceeded the Scheduled Phase 1 Study Timeframe;<sup>5</sup> and

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<sup>2</sup> See *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *order on reh’g*, 185 FERC ¶ 61,063 (2023), *order on reh’g*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024).

<sup>3</sup> See *N.Y. Indep. Sys. Operator, Inc.*, Order on Compliance, 191 FERC ¶ 61,049 (2025). In a subsequent compliance filing on June 16, 2025, the NYISO submitted additional tariff revisions in compliance with the Commission’s directives, including conforming revisions to the study metrics and informational reporting requirements. The Commission accepted these revisions in its October 16, 2025 *Order Addressing Arguments Raised on Rehearing, and Setting Aside Prior Order, In Part, and on Compliance*, 193 FERC ¶ 61,031 (2025).

<sup>4</sup> See <https://www.nyiso.com/documents/20142/56825323/transition-cluster-phase-1-report-metrics.xlsx/e0483db3-5b72-e9f4-1dde-0b860503ff7d>.

<sup>5</sup> “Scheduled Phase 1 Study Timeframe” is defined in Section 40.9.2.1(i) of Attachment HH to the OATT as the “one hundred ninety (190) Calendar Day period between the Phase 1 Study Start Date and the ISO’s presentation to its Operating Committee for its approval of the Phase 1 Cost Estimates Summary Report. As defined in Section 40.9.3.1.3.1 of Attachment HH to the OATT, the “Actual Phase 1 Study Timeframe” is the duration of the Phase 1 Study process between the Phase 1 Study Start Date and the ISO’s presentation to its Operating Committee of the Phase 1 Cost Estimates Summary Report.

- (ii) steps taken to remedy these specific issues and, if applicable, prevent such delays in the future.

In accordance with Section 40.9.3.1.3.1 of Attachment HH to the OATT, the NYISO hereby submits this report describing the reasons for the Transition Cluster Study Phase 1 Study delays and steps being taken to remedy these issues and help prevent future delays.

### **B. Phase 1 Study Metrics**

The Phase 1 Study process provides for individual studies performed by the respective Connecting Transmission Owner(s) and Affected Transmission Owner(s) for each Cluster Study Project.<sup>6</sup> The Phase 1 Study identifies any Connecting Transmission Owner's Attachment Facilities, Distribution Upgrades, and Local System Upgrade Facilities, along with the related metering, protection, and telecommunication facilities, required for the reliable interconnection of each project in accordance with Applicable Reliability Requirements, to the extent such upgrades are not physically infeasible.<sup>7</sup> The study also provides a +30%/-15% estimate of the cost of equipment, engineering and design work, procurement, construction and commissioning of the identified facilities and a preliminary schedule to construct such facilities.<sup>8</sup> The tariff requires the Transmission Owner to (1) develop the draft study within 150 days after the NYISO provides an updated project list and a finalized short-circuit base case, and (2) finalize the study within an additional 30 days addressing NYISO and Interconnection Customer input.<sup>9</sup> The NYISO then presents the cost estimates determined in the Phase 1 Studies to its stakeholder Transmission Planning Advisory Subcommittee for review and then to its Operating Committee for its approval.<sup>10</sup>

The Phase 1 Study is estimated to take 190 Calendar Days to complete (between the Phase 1 Study Start Date and the ISO's presentation to its Operating Committee for its approval of the Phase 1 Cost Estimates Summary Report). The Phase 1 Study for the Transition Cluster Study commenced on February 26, 2025, and the Phase 1 Study cost estimates were approved by the NYISO's Operating Committee on November 3, 2025 – 61 Calendar Days beyond the scheduled Phase 1 Study duration.

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<sup>6</sup> For the Transition Cluster Study only, if, within ten (10) Business Days of the start of the Customer Engagement Window, a Connecting Transmission Owner or Affected Transmission Owner demonstrates to the NYISO good cause that it is unable to perform or use a contractor to perform a Phase 1 Study, then the ISO will use a third party contractor pursuant to Section 40.24.4 of Attachment HH to the OATT to perform the study on behalf of the Transmission Owner. *See* OATT Attachment HH § 40.10.4.1. Pursuant to this tariff provision, NYISO used a third party contractor to perform certain Phase 1 Studies on behalf of New York State Electric & Gas Corporation, Rochester Gas and Electric Corporation, and Long Island Lighting Company d/b/a LIPA, a subsidiary of the Long Island Power Authority.

<sup>7</sup> *See* OATT Attachment HH §§ 40.10.4.1, 4.10.4.2.

<sup>8</sup> *See id.* § 4.10.4.3.

<sup>9</sup> *See id.* § 4.10.5.

<sup>10</sup> *See id.* § 4.10.6.

At the time the Phase 1 Study commenced, there were 251 projects in the Transition Cluster. Compared to the largest historic Class Year Study of 78 projects,<sup>11</sup> this constituted over three times the maximum number of projects the NYISO and Transmission Owners processed in any prior Class Year Study. The NYISO and Transmission Owners were also working with substantially different interconnection procedures and requirements and a newly updated interconnection portal. Notwithstanding the challenges these dynamics presented, the NYISO and Transmission Owners were able to complete the Phase 1 Study and achieve NYISO Operating Committee approval of the Phase 1 Cost Estimates Study Report within 251 days of the start of the Phase 1 Study.

#### 1. Details on Reasons for Phase 1 Study Delays

For the 203 Transition Cluster Study Projects, there were a total of 272 Phase 1 Study reports<sup>12</sup> completed by Connecting Transmission Owners, Affected Transmission Owners and the NYISO. 102 reports were finalized beyond the Scheduled Phase 1 Study Timeframe. In the Phase 1 Study metrics posted by the NYISO on December 17, 2025, for each delayed Phase 1 Study, the NYISO provided an explanation as to the major driver(s) for delay(s) attributable to each individual project. The reasons for delays are divided into 4 main categories. For each Transition Cluster Study Project with a Phase 1 Study Report that exceeded the Scheduled Phase 1 Study Timeframe, the December 17, 2025 posting provided the respective category and sub-category for the delay driver(s) (some reports had more than one reason for delay):

- 1. Clarifications required to the data and/or diagram provided by the Interconnection Customer (1 report);**
- 2. Technical challenges (138 reports) due to the following:**
  - Cluster size (19 reports);
  - Complexity of designing local System Upgrade Facilities associated with the POI proposed by the Interconnection Customer (62 reports);
  - More than one project proposing to interconnect in the same electrical vicinity (56 reports); and
  - Clarification of detailed design of facilities in the Existing System Representation (1 report).
- 3. Administrative challenges (30 reports) due to the following:**
  - Comments on the Phase 1 Reports had not been incorporated or required additional clarification and/or coordination, necessitating follow-up and/or revisions to the Phase 1 Study Report (21 reports);

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<sup>11</sup> The Class Year Study for Class Year 2019 initially included 91 projects at the study's commencement. After project withdrawals during the study, 78 projects remained.

<sup>12</sup> For some projects, there were multiple reports if the project had an Affected Transmission Owner.

- Inadvertent identification of upgrades beyond the scope of Phase 1 Study necessitating revisions to the Phase 1 Study Report (2 reports);
- Inadvertent mischaracterization of upgrades necessitating revisions to the Phase 1 Study Report (6 reports); and
- Project withdrawals or reinstatement due to Dispute Resolution process (1 of reports).

#### **4. Revisions to study base cases (1 report) due to Interconnection Customer corrections/revisions to project data and/or diagrams (1 report).**

As evidenced by the above categorizations, the primary reasons for delays in the Phase 1 Study were attributable to the large number of Transition Cluster Study Projects, the number of Transition Cluster Study Projects proposing to interconnect in close proximity, and the complexity of designing local System Upgrade Facilities associated with the POI proposed by the Interconnection Customer. It is important to recognize that mitigating the reliability impact of over 30 GW of new generation (nearly doubling NYISO's Summer peak load) requires numerous significant upgrades, many of which include the upgrades identified in the Phase 1 Study.

#### **2. Steps to Remedy Delays**

For the above-mentioned delays, the NYISO and Transmission Owners are working towards resolution of many of the issues and challenges on a collaborative basis with the Interconnection Customers and/or other involved entities. For example:

- automation and optimization of tasks associated with the Phase 1 Study process;
- coordination with all relevant parties in a more streamlined and structured approach throughout the Phase 1 Study process;
- adjustments to internal departments and processes;
- engagement of additional resources and training as needed to prevent delays in the future;
- clarification on the scope and timing of tasks to perform during the Phase 1 Study process.

The processing of interconnection studies continues to be affected by the significant, sustained growth in the volume of Interconnection Requests, the number of projects seeking to interconnect in closer proximity to each other, and the increasing complexity of the interaction among Interconnection Requests.

The NYISO remains committed to improving its interconnection process to reduce the potential for delays. The NYISO has taken a multipronged approach to improving the efficiency of its interconnection procedures. The NYISO has taken steps to improve the exchange of information for the study of Interconnection Requests, which include updating the NYISO's interconnection projects portal to enhance the use and sharing of information. The NYISO has also engaged in an extensive stakeholder process to solicit feedback from Transition Cluster

Study participants – Interconnection Customers and Transmission Owners – to craft process improvements to assist with the next Cluster Study.

A total of 25 proposals are currently under discussion in the NYISO’s stakeholder process with a Section 205 filing targeted for Q2 2026.<sup>13</sup> If accepted by the Commission, such process changes would apply to the next Cluster Study expected to commence in Q3 2026.

### **III. Service**

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, a complete copy of this filing will be posted on the NYISO’s website at [www.nyiso.com](http://www.nyiso.com), and the NYISO will send an electronic link to this filing to the official representative of each of its customers and to each participant on its stakeholder committees.

### **IV. Conclusion**

Wherefore, the NYISO respectfully requests that the Commission accept this informational filing as required by Section 40.9.3.1.3.1 of Attachment HH to the OATT.

Respectfully submitted,

/s/ Sara B. Keegan  
Sara B. Keegan  
Raquel M. Parks  
*Counsel for the New York Independent System  
Operator, Inc.*

cc: Janel Burdick  
Emily Chen  
James Dawson  
Jignasa Gadani  
Leanne Khammal  
Jaime Knepper  
David Morenoff  
Jason Rhee  
Douglas Roe

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<sup>13</sup> See *2026 Cluster Study Enhancements* presentation (February 3, 2026) available at: [https://www.nyiso.com/documents/20142/56802634/10\\_Cluster%20Enhancements%2020260203%20TPAS\\_Final.pdf/87b2950c-73b3-0a31-41bd-86442b5ad170](https://www.nyiso.com/documents/20142/56802634/10_Cluster%20Enhancements%2020260203%20TPAS_Final.pdf/87b2950c-73b3-0a31-41bd-86442b5ad170).