

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Building for the Future Through Electric
Regional Transmission Planning and
Cost Allocation**

Docket Nos. RM21-17-000; -001

**MOTION FOR LIMITED EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING OF
THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.
AND REQUEST FOR EXPEDITED ACTION BY APRIL 10, 2026**

In accordance with Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure,¹ the New York Independent System Operator, Inc. (“NYISO”) respectfully requests that the Commission grant a limited, sixty (60) day extension to June 29, 2026, of the due date for the NYISO’s submission of its compliance filing to address the regional requirements established by Order Nos. 1920, 1920-A, and 1920-B (“Order No. 1920”).² The NYISO further requests that the standard five-day period for answering motions for extension of time established under Rule 213(d)(1)(i) apply to this filing.³ Finally, the NYISO asks that the Commission act expeditiously to grant the requested extension no later than April 10, 2026, so that the NYISO will know with certainty when its compliance filing is due.

On March 24, 2025, the Commission granted the NYISO’s request for an extension of time in this proceeding to submit its compliance filing to address the regional requirements of Order No. 1920 to April 30, 2026.⁴ Good cause exists for the Commission to grant the NYISO a

¹ 18 C.F.R. §§ 385.212, 385.2008 (2026).

² *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Order No. 1920, 187 FERC ¶ 61,068 (2024), *order on reh’g and clarification*, Order No. 1920-A, 189 FERC ¶ 61,126 (2024), *order on reh’g and clarification*, Order No. 1920-B, 191 FERC ¶ 61,026 (2025).

³ 18 C.F.R. §§ 385.213(d)(1)(i) (2026).

⁴ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000 (March 24, 2025). The Commission also granted the NYISO’s requested extension of the due date for its submission of its compliance filing to address the interregional requirements of Order No. 1920 to June 14, 2027. The NYISO is not requesting in this motion a further extension of its compliance deadline to address the interregional requirements.

further 60-day extension of this deadline to June 29, 2026. As described below, the NYISO has been working diligently with the Relevant State Entities in New York and NYISO stakeholders and has made substantial progress in developing revisions to its regional transmission planning process requirements that comply with Order No. 1920 within the framework of New York-specific circumstances. This has included extensive coordination with the New York State Department of Public Service (“NYDPS”) to position these reforms within the broader context of New York State’s transmission planning efforts. The requested extension will improve the NYISO’s compliance proposal by providing a short period of additional time for the NYISO to complete its development of certain remaining compliance requirements and for Relevant State Entities and stakeholders to have adequate time to review and provide comments on these reforms. An additional 60-day extension of the filing deadline is in line with extensions granted to other independent system operators and regional transmission organizations in this proceeding⁵ and will not delay the NYISO’s implementation of the rules adopted in compliance with Order No. 1920 or prejudice any party’s interests.

I. MOTION FOR EXTENSION OF TIME

The Commission’s Rules of Practice and Procedure permit the Commission to extend “the time by which any person is required or allowed to act under any statute, rule, or order” upon motion demonstrating good cause prior to the expiration of such time.⁶ The NYISO’s request for an extension of time is supported by good cause as described herein.

⁵ See *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000 (Feb. 10, 2026) (granting ISO New England, Inc. an extension until June 14, 2027, to submit its compliance filing for Order No. 1920’s regional requirements); *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000 (Dec. 10, 2024) (granting the Midcontinent Independent System Operator, Inc. an extension until June 12, 2026, to submit its compliance filing for Order No. 1920’s regional requirements).

⁶ 18 C.F.R. § 385.2008(a).

A. Background

On May 13, 2024, the Commission issued Order No. 1920 revising the *pro forma* Open Access Transmission Tariff (“OATT”)⁷ to remedy deficiencies in the Commission’s existing regional and local transmission planning and cost allocation requirements. Specifically, the Commission requires transmission providers to, among other things, conduct Long-Term Regional Transmission Planning that will ensure the identification, evaluation, and selection, as well as the allocation of the costs, of more efficient or cost-effective regional transmission solutions to address Long-Term Transmission Needs. Order No. 1920 directed transmission providers to submit their compliance in two parts with the regional requirements for a Long-Term Regional Transmission Planning process to be filed within 10 months of the effective date of the final order—*i.e.*, on or before June 12, 2025.⁸ On November 21, 2024, the Commission issued Order No. 1920-A modifying and clarifying parts of Order No. 1920 that, among other things, reaffirmed that meaningful engagement with states is “critical to the success of the Long-Term Regional Transmission Planning reforms.”⁹ Order No. 1920-A did not modify the regional or interregional compliance filing deadlines.¹⁰ On March 24, 2025, the Commission granted the NYISO’s request for an extension of time in this proceeding to submit its compliance filing to meet the regional requirements of Order No. 1920 to April 30, 2026.¹¹

⁷ Capitalized terms that are not otherwise defined in this filing shall have the meaning specified in Attachment Y of the NYISO OATT and, if not defined therein, in Section 1 of the NYISO OATT.

⁸ Order No. 1920 at PP 1768–74. Order No. 1920 was published in the *Federal Register* on June 12, 2024, with an effective date of August 12, 2024, while Order No. 1920-A was published in the *Federal Register* on November 21, 2024.

⁹ Order No. 1920-A at P 3.

¹⁰ *Id.* at P 914. Order No. 1920-A provided for extending the compliance deadlines in limited cases to align with an extension of the engagement period based on the request of a relevant state entity.

¹¹ See footnote 4 above.

B. Good Cause Exists for the NYISO’s Requested 60-Day Extension, Which Will Allow for Continued Coordination with the Relevant State Entities and NYISO Stakeholders Concerning the NYISO’s Proposed Long-Term Regional Transmission Planning Process

Good cause exists for the NYISO’s requested extension of its compliance deadline for the regional requirements of Order No. 1920 to June 29, 2026. The NYISO has made substantial progress towards the development of its compliance proposal. It has held numerous stakeholder meetings concerning its proposed reforms, including sharing details of its compliance proposals and draft tariff revisions for stakeholder review and comment.¹² In addition, the NYISO has requested input from, and worked in close consultation with, the Relevant State Entities in New York concerning the new Long-Term Regional Transmission Planning process and the related cost allocation requirements.¹³ The requested extension will afford the NYISO, Relevant State Entities, Transmission Owners, and other NYISO stakeholders with a short period of additional time to continue to coordinate to improve opportunities for finding consensus or minimizing areas of concern regarding a Long-Term Regional Transmission Planning process that complies with Order No. 1920 within the framework of the NYISO’s unique transmission planning process and New York State’s transmission planning efforts.

The NYISO has a strong and successful track record as a single-state independent system operator of coordinating with New York State entities in its transmission planning processes to

¹² As of the date of this motion, the NYISO has discussed its compliance with Order No. 1920 at stakeholder ESPWG/TPAS meetings on the following dates: August 6, 2024; January 21, 2025; February 12, 2025; September 25, 2025; November 20, 2025; December 18, 2025; January 20, 2026; February 3, 2026; February 19, 2026; and March 9, 2026. The NYISO has also facilitated and participated in meetings of the Relevant State Entities concerning their Engagement Periods to review cost allocation methodologies for the long-term transmission planning process.

¹³ See, e.g., Order No. 1920-A at P 242. In New York, the NYDPS and the Long Island Power Authority have been identified as the Relevant State Entities.

identify and address transmission needs in New York.¹⁴ The NYISO shares the aims of the Commission in Order No. 1920 for close coordination with Relevant State Entities. The NYISO has been working, and will continue to work, with New York State entities in developing a Long-Term Regional Transmission Planning process that enhances transmission planning in New York in compliance with Order No. 1920 and establishes appropriate coordination with state-level processes.

A key consideration in the NYISO’s development of its Long-Term Regional Transmission Planning process is the interaction of the new process required by Order No. 1920 with New York’s parallel transmission planning efforts – the Coordinated Grid Planning Process (“CGPP”) – that was implemented by the New York State Public Service Commission (“NYPSC”) in 2023 to comply with New York legislation to achieve the targets in the state’s Climate Leadership and Community Protection Act (“CLCPA”).¹⁵ In particular, the NYPSC adopted the CGPP through which the NYDPS and certain New York utilities plan for transmission and distribution facilities to achieve the state’s goals with inputs from a state-designated advisory committee.¹⁶ The state’s CGPP shares many of the objectives that the Commission set forth in Order No. 1920.¹⁷ The NYDPS and utilities are currently administering

¹⁴ The Commission has acknowledged the NYISO’s successful collaboration with the NYPSC to identify and address Public Policy Transmission Needs. *See, e.g., New York Indep. Sys. Operator, Inc.*, 175 FERC ¶ 61,038 (2021) (Clements, concurring) at P 3 (“While this has not been the case in all regions, the success of NYISO’s competitive solicitations for public policy projects has been a bright spot in the Order No. 1000 landscape.”).

¹⁵ Accelerated Renewable Energy Growth and Community Benefit Act, Chapter 58 (Part JJJ) of the 2020 Laws of New York § 2(2)(b).

¹⁶ PSC Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Order Approving a Coordinated Grid Planning Process (August 17, 2023) (“2023 CGPP Order”); *see also* PSC Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Order on Local Transmission and Distribution Planning Process and Phase 2 Project Proposals (September 9, 2021), at pp 18–21 (directing certain New York utilities to consult with DPS staff, NYSERDA, and the NYISO to develop and file a coordinated planning process).

¹⁷ The process includes data collection, modeling, system studies, and solutions development that certain New York utilities conduct, culminating in a report setting forth recommended system investments to achieve the

the first cycle of the CGPP with the NYISO providing technical support. The NYISO's requested extension will provide time for the NYISO, the Relevant State Entities, Transmission Owners, and other NYISO stakeholders to improve the NYISO's proposed reforms, including enhancing the coordination between the NYISO's long-term transmission planning process required under Order No. 1920 and the statewide planning efforts to minimize duplicate planning efforts and resources and to optimize transmission planning in New York.

Finally, the NYISO's requested extension is consistent with extensions granted to other independent system operators and regional transmission organizations for their compliance with Order No. 1920.¹⁸ Further, the extension will not adversely impact any party or transmission planning in New York, nor will it delay the NYISO's intended timeframe for implementing its proposed reforms in compliance with Order No. 1920.

II. REQUEST FOR COMMISSION ACTION BY APRIL 10, 2026

The NYISO respectfully requests that the Commission apply the standard five-day answer period for motions for extensions of time and act expeditiously to take action on the requested extension on or before April 10, 2026. Commission action by this date will provide certainty to the NYISO, its stakeholders, and Relevant State Entities concerning the timeframe within which the NYISO must plan and conduct the remaining discussions on a proposed Long-Term Regional Transmission Planning process and enable it to allocate time accordingly to complete the work. If an extension is not granted, the NYISO will need to substantially reduce its outreach and coordination with Relevant State Entities and NYISO stakeholders, so that it can

CLCPA for the NYPSC's consideration. *Id.* at pp 4–17, 25–36; *see also New York State Dep't Pub. Serv.*, CGPP Timeline, available at <https://dps.ny.gov/system/files/documents/2024/06/cgpp-timeline-additional-detail.pdf>. The NYPSC also has the ability under the CGPP to refer bulk transmission needs to the NYISO for purposes of the NYISO's Public Policy Transmission Planning Process and to leverage the NYISO's System & Resource Outlook developed in its Economic Planning Process to facilitate coordination with the NYISO's regional planning processes. *See* 2023 CGPP Order at pp 26–32.

¹⁸ See footnote 5 above.

prioritize finalizing a compliance approach and the related tariff language in time for the current April 30, 2026 deadline.

III. CONCLUSION

For the reasons set forth above, the NYISO respectfully requests that the Commission act expeditiously to grant a 60-day extension of time to June 29, 2026, for the NYISO's submission of its compliance filing to comply with the regional requirements in Order No. 1920.

Respectfully submitted,

/s/ Michael J. Messonnier, Jr.

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March 20, 2026

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 20th day of March 2026.

/s/ Kerry Teti

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