

Attachment I

Tariff Revisions for NYISO OATT Attachment HH

The below table details the NYISO's proposed tariff revisions for new OATT Attachment HH, including indicating where such provision are existing tariff requirements previously accepted by the Commission that are consolidated from current Attachments S, X, and Z of the NYISO OATT. The below table does not specify changes that are simply updating or supplementing the current defined terms and cross references in the tariff provisions with the analogous terms and cross references used in the NYISO's new Cluster Study Process and does not specify non-substantive corrections, such as correcting spacing and formatting.

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
40.1	Definitions	Attach. X 30.1	<p>Retained NYISO's existing defined terms from its Large Facility Interconnection Procedures as the baseline of the definitions section for new Attachment HH, as revised to incorporate into new 40.1 definitions from OATT Attach. S, OATT Attach. Z, and the Order No. 2023 <i>pro forma</i> definitions as detailed in the following rows and as revised in line with the NYISO's proposed new Cluster Study Process.</p> <p>Deleted the following terms not used in the new Standard Interconnection Procedures (or only used and included in associated interconnection and construction agreements): Applicable Reliability Standard, Breach, Breaching Party, Default, Eligible Class Year Project, Interconnection Study, Interconnection System Reliability Impact Study, Large Generating Facility, NYISO, Open Class Year, Optional Feasibility Study, Optional Interconnection System Reliability Impact Study, Tariff.</p>
40.1	Definitions	Attach. S 25.1.2	<p>Inserted in Section 40.1 the following defined terms from Attachment S of the OATT as revised in line with the NYISO's proposed new Cluster Study Process: Acceptance Notice, Contribution Percentage, ERO Planning Standards (formerly NERC Planning Standards), Existing System Representation, Expedited Deliverability Study, External CRIS Rights, External-to-ROS Deliverability Rights,</p>

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			Headroom, Initial Decision Round (formerly Initial Decision Period), Non-Acceptance Notice, NPCC Basic Design and Operating Criteria, NYISO Load and Capacity Data Report, Overage Cost, Overage Cost Percentage, Project Cost Allocation, Revised Project Cost Allocation, Security, Security Posting Default, Subsequent Decision Round (formerly Subsequent Decision Period).
40.1	Definitions	Attach. Z Att. 1	Inserted in Section 40.1 the following defined terms from Attachment 1 to Attachment Z of the OATT as revised in line with the NYISO's proposed new Cluster Study Process: 10kW Inverter Process, Fast Track Process, Good Utility Practice, Minor Modification, Retired, Upgrades.
40.1	Definitions	Order No. 2023 <i>pro forma</i> LGIP Sec. 1	Inserted in Section 40.1 the following defined terms from the Order No. 2023 <i>pro forma</i> LGIP Section 1 as revised in line with the NYISO's proposed new Cluster Study Process: Affected System Interconnection Customer, Affected System Network Upgrades, Affected System Queue Position, Affected System Study, Affected System Study Agreement, Affected System Study Report, Balancing Authority, Balancing Authority Area, Cluster Study Process, Cluster Study Report, Customer Engagement Window, Electric Reliability Organization, Multiparty Affected System Study Agreement, Proportional Impact Method, Withdrawal Penalty.
40.1	Definitions	New	Inserted in Section 40.1 the following new defined terms in line with the NYISO's proposed new Cluster Study Process: Additional SDU Study Decision Period, Application Fee, Application Window, Cluster Study, Cluster Study Agreement, Cluster Study CRIS Project, Cluster Study Deliverability Study, Cluster Study Project, Cluster Study Project List, Cluster Study Process Start Date, Cluster study Transmission Project, Commercial Operation Incentive Payment Amount, Contingent Project, Cost Estimate Update, CRIS-Only Cluster Study Project, CRIS-Only Request, CTOAF and SUF Cost

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
			Allocation, Deliverable MW, Expedited Deliverability Study Agreement, External Affected System, External Affected System Operator, Energy Duration Limitation, Facility (formerly Large Facility), Facility Modification Request, Fast Track Request, Final Decision Period, Headroom Security, Heatmap, Initial Backfeed Date (formerly In-Service Date), Interconnection Customer, Interconnection Customer's Attachment Facilities (formerly Developer's Attachment Facilities), Non-Acceptance Event, Notice of SDUs Requiring Additional Study, Payment Eligible Project, Pending Project, Phase 1 Cost Estimate Summary Report, Phase 1 Entry Decision Period, Phase 1 Study, Phase 1 Study Start Date, Phase 2 Entry Decision Period, Phase 2 Study, Phase 2 Study Start Date, Physical Infeasibility, Physical Infeasibility Screening, Pre-Application Report, Pre-Application Request Form, Queue, Readiness Deposits, Readiness Deposit 1, Readiness Deposit 2, Regulatory Limitations, Site Control Deposit, Standard Upgrade Construction Agreement, Standard Multiparty Upgrade Construction Agreement, Synchronization Date (formerly Initial Synchronization Date), Transition Cluster Study, Transition Cluster Study Process, Transition Cluster Study Process Start Date, UCAP Deration Factor, Withdrawal Penalty Funds.
40.2.1	Effective Date of Standard Interconnection Procedures	New	Established effective date of Standard Interconnection Procedures and the replacement of existing interconnection procedures as described in Part VI of cover letter.
40.2.2	Scope of Standard Interconnection Procedures	New	Inserted high-level overview and guidepost language for the Standard Interconnection Procedures to assist developer and market participant understanding of process.
40.2.3	Application of Standard	Attach. S § 25.2, Attach. X	Consolidated into single location existing tariff requirements detailing which projects are eligible to proceed through the Standard

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	Interconnection Procedures	§§ 30.2.1, 30.3.1, and Attach. Z § 32.1.1.1	Interconnection Procedures versus other NYISO, New York Transmission Owner, or state interconnection procedures. Included requirements for use of Fast Track Process and 10 kW process. Clarified the application of the Standard Interconnection Procedures for projects solely obtaining or increasing CRIS as described in Part VII.B.ii of cover letter.
40.2.4	Fee and Deposit Requirements for the Standard Interconnection Procedures	New.	Described requirements for developers to use cash, letter of credits, or surety bonds for deposits under Standard Interconnection Procedures as described in Part VII.D.ii.b of cover letter.
40.2.5	Comparability	Attach. X § 30.2.2	Retained NYISO's existing tariff requirements with deletion of reference to Reasonable Efforts per updated FERC pro forma LGIP § 2.2.
40.2.6	Base Case Data	Attach. X § 30.2.3	Retained NYISO's existing tariff requirements.
40.2.7	No Applicability to Transmission Service or Other Services	Attach. X § 30.2.4	Retained NYISO's existing tariff requirements.
40.2.8	Transmission Service Customer Rights	Attach. S § 25.10.5	Retained NYISO's existing tariff requirements.
40.2.9	ISO Data Requirements	Attach. S § 25.10.3	Retained NYISO's existing tariff requirements.
40.2.10	Limitation of Liability	New	Inserted tariff language clarifying that the NYISO and New York Transmission Owner's performance of their obligations under the Standard Interconnection Procedures fall within the limitation of liability provisions in the body of the OATT as described in Part VII.D.i of the cover letter.

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40.2.11	Rights Under the Federal Power Act	Attach. S § 25.10.4.	Retained NYISO's existing tariff requirements with revisions to reference the right of a party to and under the ISO/TO Agreement or an Operating Agreement.
40.2.12	Inclusion of Black Start Capability at Generating Facility Larger than 20 MW	Attach. X § 30.2.5	Retained NYISO's existing tariff requirements, except to clarify that the black start requirements only apply to generators larger than 20 MW, which is consistent with current rules, and to specify that Consolidated Edison would perform required study during Phase 1 Study to replace reference to System Reliability Impact Study that is no longer part of NYISO process.
40.3.1	Transition Procedures for Interconnection Requests and CRIS-Only Requests Submitted Prior to the Effective Date of Standard Interconnection Procedures	New.	Established transition procedures for Interconnection Requests and CRIS-Only Requests that were submitted prior to the effective date of the Standard Interconnection Procedures as described in Part X.B.ii of the cover letter.
40.3.2	New Transmission Provider	Attach. X § 30.5.2	Retained NYISO's existing tariff requirements.
40.4.1	Heatmap	New	Inserted Heatmap requirements based on updated FERC pro forma LGIP § 6.1, with certain revisions described in Part VIII.A.i of the cover letter.
40.4.2	Pre-Application Report	New	Established new Pre-Application Report process based on NYISO's existing process for Small Generating Facilities in OATT Attach. Z § 32.1.2.2, as described in Part VIII.A.ii of the cover letter.

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40.5.1	Start Date for Transition Cluster Study Process and Subsequent Cluster Study Processes	New	Established requirements for start date of Transition Cluster Study Process and subsequent Cluster Study Processes as described in Parts VII.A.iii and X.B.a of the cover letter.
40.5.2	Transition Cluster Study Process	New	Established requirements for performing Transition Cluster Study Process as described in Part X.B.i of the cover letter.
40.5.3	Application Window Duration	New	Established requirements for duration of Application Window as described in Part VII.B of the cover letter.
40.5.4	Submission of Interconnection Request or CRIS-Only Request in Application Window	New	Established requirements for submission of Interconnection Requests or CRIS-Only Requests as described in Part VII.B.iii of the cover letter.
40.5.4.1	Contingent Projects	New	Established requirements for Contingent Projects as described in Part VII.B.vi of the cover letter.
40.5.5	Interconnection Request or CRIS-Only Request Submission Requirements	Attach. X §§ 30.3.1, 30.3.3.1.	Revised existing Interconnection Request requirements to establish information and materials that must be submitted with Interconnection Requests or CRIS-Only Requests, including Application Fee, Study Deposit, Site Control, and other submission requirements as described in Part VII.B.iii of the cover letter. Incorporated updated FERC <i>pro forma</i> §§ 3.1.1, 3.1.2, and 3.4.2, as revised.
40.5.6.1	Two Types of Service	Attach. X § 30.3.2.1	Retained NYISO's existing tariff requirements.

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40.5.6.2	Service Elections, Generally	Attach. X § 30.3.2.2	Retained NYISO’s existing tariff requirements, as revised to delete process steps from NYISO’s existing process that are not part of new process.
40.5.6.3	ERIS Elections	Attach. X § 30.3.2.3	Retained NYISO’s existing tariff requirements, with limited revisions to clarify meaning of “full output” and where maximum capability is measured for purposes of ERIS determinations.
40.5.6.4	CRIS Elections	Attach. X § 30.3.2.4, Attach. S § 25.3.1, Attach. Z § 32.1.1.7	Retained NYISO’s existing tariff requirements, with limited revisions to consolidate into this provision existing requirements for permitted CRIS increases and to replace “funded or committed to fund” with the more accurate description “paid cash or provided Security.”
40.5.6.5	Maximum Requested CRIS	Attach. S § 25.8.1.	Consolidated into this provision the requirements for maximum requested CRIS. The NYISO retained existing requirements, with revisions to delete language addressed elsewhere in Attachment HH and clarified and consolidated language concerning CRIS requirements for Facilities comprised of multiple units.
40.5.6.6	Increases in Established CRIS Values	Attach. X § 30.3.2.6	Retained NYISO’s existing tariff requirement, with revisions to address how requests for increases CRIS are to be made under the new Standard Interconnection Procedures structure.
40.5.7.1	Acknowledgement and Assessment of Interconnection Request and CRIS-Only Request	Attach. X § 30.3.3.2, Attach. Z § 32.1.3.1	Revised requirements for validating an Interconnection Request or CRIS-Only Request, including addressing the updated FERC pro forma LGIP § 3.4.4, and for entering into Cluster Study Agreement as described in Part VII.B.i of the cover letter.
40.5.7.2	Deficiencies in Interconnection Request or CRIS-Only Request	Attach. X § 30.3.3.3	Revised requirements for addressing deficiencies in Interconnection Request or CRIS-Only Request as described in Part VII.B.i of the cover letter.

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40.5.7.3	Transmission Owner Review of Interconnection Customer's Submission of Transmission Owner-Specific Technical Information	New	Established requirements for New York Transmission Owners to obtain, and address deficiencies with, information requirement for performance of Phase 1 Studies, as described in Part VII.B.i of the cover letter.
40.5.7.4	Subsequent Information Request	New	Established requirement for subsequent information request, addressing updated FERC pro forma LGIP § 3.4.4, as described in Part VII.B.i of the cover letter.
40.5.8	OASIS Posting	Attach. X § 30.3.4	Retained NYISO's existing tariff requirements with certain language concerning the scoping meeting relocated to the scoping meeting tariff section.
40.6.1	Queue Position	Attach. X § 30.4.1	Revised NYISO's existing tariff requirements to detail Queue Position requirements for new process as described in Part VII.B.v of the cover letter.
40.6.1.2	Higher Queue Position	Attach. X § 30.4.1	Revised NYISO's existing tariff requirements to detail application of Queue Position for new process, including for priority for Physical Infeasibility determinations as described in Part VII.C.iii of the cover letter.
40.6.2	Transferability of Queue Position	Attach. X § 30.4.3	Revised NYISO's existing tariff requirements to insert rules for addressing payments and deposits when a project is being transferred between developers as described in Part VII.B.v of the cover letter.
40.6.3	Modifications	Attach. X § 30.4.4	Revised NYISO's existing tariff requirements to update modification rules as described in Part VII.E.i of the cover letter.
40.6.4	Withdrawal	Attach. X § 30.3.6	Revised NYISO's existing tariff requirements to update withdrawal rules to establish separate cure period for a developer's failure to pay

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			or maintain a deposit, to establish that there is not a cure period for an Interconnection Customer's failure to address deficiencies within tariff prescribed deadlines, and to update the impacts of a project's withdrawal in line with the invoicing and deposit rules for the Cluster Study Process.
40.6.5	Withdrawal Penalties	New	Established requirements for Withdrawal Penalties and the distribution of Withdrawal Penalty Funds as described in Part VII.D.ii of the cover letter.
40.7.1	Customer Engagement window Start Date, Duration, and Scope	New.	Established timeframe and scope of Customer Engagement Window as described in Part VII.C.i of the cover letter.
40.7.2	Posting of Cluster Study Project List	New	Established requirements for NYISO to post Cluster Study Project List, based on updated FERC pro forma LGIP § 3.4.5, as described in Part VII.C.ii of the cover letter. Established requirements for 5 business day window during which Interconnection Customers may change Point of Interconnection and may withdraw penalty free from the process as described in Part VII.B.iii.d of the cover letter.
40.7.3	Physical Infeasibility Screening	New	Established requirements for New York Transmission Owners to perform Physical Infeasibility Screening as described in Part VII.C.iii of the cover letter.
40.7.4	Scoping Meeting	Attach. X § 30.3.3.4	Revised NYISO's existing tariff requirements for the scoping meeting as described in Part VII.C.iv of the cover letter.
40.7.5	Phase 1 Entry Decision Period	New; Attach. X 30.8.2.1	Established requirements for Phase 1 Entry Decision Period, as described in Part VII.D.i.d of the cover letter; incorporated existing requirements from Attach. X § 30.8.2.1 requiring Interconnection

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			Customer to provided updated Initial Backfeed Date, Synchronization Date, and Commercial Operation Date.
40.7.6	Withdrawal and Withdrawal Penalties	New	Established requirements for withdrawal and Withdrawal Penalties for Customer Engagement Window through Phase 1 Entry Decision Period as described in Part VII.D.ii.b of the cover letter.
40.8.1	Coordination with Affected Systems within the New York Control Area	Attach. X § 30.3.5	Revised NYISO's existing Affected System rules to apply to the Affected Systems located within the New York Control Area as described in Part IX.B of the cover letter; as such Affected Systems are address in Cluster Study Process, removed current references to potential alternative studies.
40.8.2	Coordination with External Affected Systems	New	Established NYISO's requirements for coordinating with External Affected Systems when the NYISO identifies potential impacts to a neighboring region of a project proposing to interconnect in New York as described in Part IX.C of the cover letter.
40.8.3	Study of Impacts to New York State Transmission System of an Affected System Interconnection Customer's Proposed Interconnection to Another Region's Transmission System	New	Established NYISO's requirements for perform an Affected System Study in cases in which a proposed interconnection to a neighboring region has impacts in New York, based on updated FERC pro forma LGIP §§ 3.6, 9.1-9.10, as revised by the NYISO and described in Part IX.D of the cover letter.
40.9.1	Cluster Study Overview	New	Inserted high-level overview of Cluster Study as guidepost to assist developers and market participants.
40.9.2	Timeframes	New	Established timeframes for duration of Phase 1 Study and Phase 2 Study as described in Part VII.D.i of the cover letter.

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40.9.3	Study Metrics and Penalties for Study Delays	New	Established updated study metric and information reporting requirements for NYISO for performance of Phase 1 Study, Phase 2 Study, and Additional SDU Studies as described in Part XI.B of the cover letter. Established rules for penalties for study delays as described in Part XI.B of the cover letter.
40.9.4	No Prioritization of Cluster Study Projects	Attach. S § 25.5.8	Retained NYISO’s existing tariff requirements that there is no priority among Cluster Study Projects, with revisions to address limited circumstances in new process where priority could apply in “jump ball” scenario due to Physical Infeasibility limitations and to remove reference to Expedited Deliverability Study rules, which are addressed elsewhere in Attachment HH.
40.9.5	Interconnection Facilities Covered by the Cluster Study	Attach. S § 25.4	Retained NYISO’s existing description of the applicable interconnection standards and facilities under the NYISO’s process.
40.9.5.1	Interconnection Standards	Attach. S § 25.4.1	Retained NYISO’s existing description of the applicable interconnection standards under the NYISO’s process.
40.9.5.2	Interconnection Facilities	Attach. S § 25.4.2	Retained NYISO’s existing description of the applicable interconnection facilities under the NYISO’s process.
40.9.6	NYISO Minimum Interconnection Standard	Attach. S § 25.2	Retained NYISO’s existing description of the NYISO Minimum Interconnection Standard, with certain requirements concerning reliability based upgrades relocated to Section 40.2.
40.9.7	NYISO Deliverability Interconnection Standard	Incorporated OATT Attach. S § 25.3, as revised.	Retained NYISO’s existing description of the NYISO Deliverability Interconnection Standard: (i) with certain requirements concerning obtaining CRIS rights relocated to Section 40.5.6, (ii) deleting description of transmission projects eligible to participate in the Standard Interconnection Procedures which are instead defined in

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			40.1, and (iii) replacing “funded or committed to fund” with the more accurate “pay cash or posted Security.”
40.9.8.1	Overview of Cost Allocation Rules for Cluster Study - Purpose of the Rules	Attach. S § 25.5.1	Retained NYISO’s existing tariff requirements, deleting requirements that addressed how different types of projects entered NYISO’s Class Year Study process.
40.9.8.2	Attachment Facilities	Attach. S § 25.5.6	Retained NYISO’s existing tariff requirements.
40.9.8.3	Distribution Upgrades	Attach. S § 25.5.7	Retained NYISO’s existing tariff requirements.
40.9.8.4	Side Agreements	Attach. S § 25.5.1	Retained NYISO’s existing tariff requirements.
40.9.8.5	Costs Covered by Attachment HH	Attach. S § 25.5.2.	Retained NYISO’s existing tariff requirements.
40.9.8.6	Dispatch Costs	Attach. S § 25.5.3	Retained NYISO’s existing tariff requirements.
40.9.8.7	Transmission Owners’ Cost Recovery	Attach. S § 25.5.4	Retained NYISO’s existing tariff requirements.
40.10.1	Phase 1 Study Start Date and Duration	New.	Established timeframe of Phase 1 Study process as described in Part VII.D.i.a of the cover letter.
40.10.2	ISO Development Work for Cluster Study System Representation Models Prior to Commencement of Phase 1 Study	New.	Established requirements concerning NYISO’s development of the Existing System Representation, Cluster Baseline Assessment base cases, and Cluster Project Assessment base cases for purposes of the Phase 1 Study and Phase 2 Study, along with the New York Transmission Owners’ review of the base cases, as described in Part VII.D.i.a of the cover letter.
40.10.3	Existing System Representation	Attach. S § 25.5.5	Retained NYISO’s existing tariff requirements for creating the Existing System Representation with limited revisions to: (i) provide for Affected System Network Upgrade to be incorporated into this

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			baseline when the applicable developer has accepted its cost allocation and posted security for such upgrade, (ii) replace references to process dates in the NYISO's current process for obtaining certain data with analog dates under the new process, and (iii) clarify that to be included in baseline a developer must not only have accepted its cost allocation, but also paid cash or posted security for the allocated amount.
40.10.4	Phase 1 Study Scope and Procedures	New	Established the description of the Phase 1 Study scope and procedures, incorporating certain tariff requirements from OATT Attach. X §§ 30.8.2-30.8.3 and addressing allocation of responsibilities within the Phase 1 Study between the NYISO and Transmission Owners as described in Part VII.D.i.a of the cover letter.
40.10.5	Phase 1 Study Reports	New	Established the process for reviewing and finalizing Phase 1 Study reports.
40.10.6	Stakeholder Review of the Phase 1 Cost Estimates Summary Report	New	Established the requirements for the stakeholder process to review and approve the Phase 1 Cost Estimates Summary.
40.10.7	Preparatory Work for Phase 2 Study	New	Established the preparatory work performed during the Phase 1 Study for purposes of the Phase 2 Study and the allocation of responsibilities between the NYISO and Transmission Owners, as described in Part VII.D.i.b of the cover letter.
40.10.8	Phase 2 Entry Decision Period	New	Established requirements for Phase 2 Entry Decision Period, as described in Part VII.D.i.c of the cover letter.
40.10.9	Withdrawal and Withdrawal Penalties	New	Established requirements for withdrawal and Withdrawal Penalties for Phase 1 Study process through Phase 2 Entry Decision Period as described in Part VII.D.ii.b of the cover letter.

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40.11.1	Phase 2 Study Process Start Date and Duration	New	Established timeframe of Phase 2 Study process as described in Part VII.D.i.c of the cover letter.
40.11.2	Phase 2 Study – Scope and Procedures of Energy Resource Interconnection Services Analysis	New; Attach. X § 30.3.2.7	Established the description of the Phase 2 Study scope and procedures for ERIS, incorporating certain tariff requirements from OATT Attach. X § 30.3.2.7 and addressing allocation of responsibilities within the Phase 2 Study between the NYISO and Transmission Owners as described in Part VII.D.i.c of the cover letter.
40.11.3	Phase 2 Study – Scope of Capacity Resource interconnection Service Analysis	New	Established the description of the Phase 2 Study scope and procedures for CRIS, addressing allocation of responsibilities within the Phase 2 Study between the NYISO and Transmission Owners as described in Part VII.D.i.c of the cover letter.
40.11.4	Determination of Cost Estimates and Schedule for SUFs, Distribution Upgrades, and SDUs Identified in Phase 2 Study	New.	Established the description of the determination of cost estimates for upgrades identified in the Phase 2 Study, addressing the allocation of responsibilities within the Phase 2 Study between the NYISO and Transmission Owners as described in Part VII.D.i.c of the cover letter.
40.11.5	Phase 2 Study – Additional Requirements	Attach. X § 30.8.3	Retained NYISO’s existing tariff requirements, with limited revisions to (i) insert Order No. 2023 tariff language regarding evaluation of alternative technologies, (ii) clarify which prior interconnection studies NYISO could rely on in performing Cluster Study, and (iii) update entities responsible for providing study information due to additional entities now performing study work.
40.11.6	Status of Cluster Study Projects	Attach. X §§ 30.8.2.1-30.8.2.2	Retained NYISO’s existing requirements, with limited revisions to establish alternative start dates for status reports to account for

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			elimination of prior start date due to change of interconnection process structure and to more clearly align with NYISO's process for coordinating with Transmission Owners.
40.11.7	Stakeholder Review of the Cluster Study Report	New	Established the requirements for the stakeholder process to review and approve the Cluster Study Report, including incorporating requirements for inclusion in report from OATT Attach. S § 25.8.1, as described in Part VII.D.i.c of the cover letter.
40.11.8	Re-Study	Attach. X § 30.8.5	Retained NYISO's existing tariff requirements in which all re-study work is performed in Final Decision Period.
40.12.1	Cluster Baseline Assessment (CBA) for Cost Allocation Between Interconnection Customers and Connecting Transmission Owners	Attach. S § 25.6.1	Retained NYISO's existing tariff requirement for performance of Cluster Baseline Assessment (previously the Annual Transmission Baseline Assessment) with the following revisions: (i) clarified that the requirements in this section that apply to the Connecting Transmission Owner also apply as applicable to an Affected Transmission Owner or Affected System Operator, (ii) aligned the description of the Cluster Study Report with the requirements for presenting that report with NYISO stakeholders in Section 40.11, (iii) removed references to Applicable Reliability Standards which are now addressed under Applicable Reliability Requirements, (iv) removed reference to work performed under System Impact Reliability Study that is not included in NYISO's new study process; (v) clarified that CBA will be reviewed with each study process instead of annually, and (vi) clarified that the entity that makes an election for an upgrade greater than is required is the entity responsible for the higher costs for that upgrade.
40.12.2	Cluster Project Assessment (CPA) for Cost Allocation Among	Attach. S § 25.6.2	Retained NYISO's existing tariff requirement for performance of Cluster Project Assessment (previously the Annual Transmission Reliability Assessment) with the following revisions: (i) clarified that the CPA rules applicable to System Upgrade Facilities apply equally

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	Interconnection Customers		to any identified Distribution Upgrades, (ii) removed requirements that required developer demonstrate non-financial regulatory milestone which requirement is not included in new Cluster Study Process, (iii) removed requirements that permitted developers to remain in Queue to enter multiple Class Year Studies which requirement is not included in new Cluster Study Process, and (iv) aligned the description of the Cluster Study Report with the requirements for presenting that report with NYISO stakeholders in Section 40.11.
40.13.1	Cluster Study Deliverability Study and Non-Cluster Study Expedited Deliverability Study	Attach. S § 25.7.1	Retained NYISO's existing tariff requirements for deliverability studies, with limited exception of describing when in new process structure a developer found undeliverable in an Expedited Deliverability Study may enter the Cluster Study Process.
40.13.2	Categories of Transmission Facilities	Attach. S § 25.7.2	Retained NYISO's existing tariff requirements for deliverability studies.
40.13.3	Capacity Regions	Attach. S § 25.7.3	Retained NYISO's existing tariff requirements for deliverability studies.
40.13.4	Participation in Capacity Markets	Attach. S § 25.7.4	Retained NYISO's existing tariff requirements for deliverability studies.
40.13.5	The Pre-Existing System	Attach. S § 25.7.5	Retained NYISO's existing tariff requirements for deliverability studies.
40.13.6	CRIS Values	Attach. S § 25.7.6	Retained NYISO's existing tariff requirements for deliverability studies, with limited modifications to remove description of CRIS requirements that only applied for specific time periods that have now past.

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40.13.7	Deliverability Study Procedures	Attach. S § 25.7.7	Retained NYISO’s existing tariff requirements for deliverability studies with limited revisions, including (i) removing of reference of “NYISO staff” performing work in place of “NYISO,” and (ii) removing reference to deliverability analysis performed under System Impact Reliability Study, which is not continuing in new process.
40.13.8	Deliverability Test Methodology for Highways and Byways	Attach. S § 25.7.8	Retained NYISO’s existing tariff requirements for deliverability studies, with limited exceptions to: (i) clarify the entities will now request CRIS rights, including External CRIS Rights, through a CRIS-Only Request in the Cluster Study Process, (ii) to replace references to Class Year Start Date from the NYISO’s current process with the Phase 1 Study Start Date for its new process, and (iii) remove references to rules applicable to specific prior Class Years.
40.13.9	Deliverability Test Methodology for Other Interfaces	Attach. S § 25.7.9	Retained NYISO’s existing tariff requirements for deliverability studies.
40.13.10	Deliverability of External Installed Capacity	Attach. S § 25.7.10	Retained NYISO’s existing tariff requirements for deliverability studies.
40.13.11	CRIS Rights For External Installed Capacity	Attach. S § 25.7.11	Retained NYISO’s existing tariff requirements for deliverability studies with limited exceptions to (i) clarify the entities will now request CRIS rights, including External CRIS Rights, through a CRIS-Only Request in the Cluster Study Process, (ii) to replace references to Class Year Start Date from the NYISO’s current process with the Phase 1 Study Start Date for its new process, and (iii) to replace “fund, or commit to fund,” with the more accurate “pay cash or post Security.”
40.13.12	Cost Allocation for Highway System	Attach. S § 25.7.12	Retained NYISO’s existing tariff requirements for deliverability studies, with limited revisions to improve readability of 40.13.12.4.

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	Deliverability Upgrades		
40.13.13	Agreements for the Engineering, Procurement, and Construction of System Deliverability Upgrades	Attach. S § 25.7.13	Retained NYISO’s existing tariff requirements for deliverability studies with limited revisions to provide for the use of the new pro forma construction agreements for construction of certain System Deliverability Upgrades as described in Part VII.E.iii of the cover letter, and (ii) to replace “fund, or commit to fund,” with the more accurate “pay cash or post Security.”
40.14.1	Notice of SDUs Requiring Additional Studies	Attach. S § 25.5.10	Retained existing tariff requirements for Additional SDU Study requirements.
40.14.2	Additional SDU Studies	Attach. S § 25.5.10	Retained existing tariff requirements for Additional SDU Study requirements, with certain revisions to further detail the process for determining the cost estimates, providing the study results to stakeholders, aligning the parallel process with the Phase 2 Study process, determining whether to terminate the study, and eliminating Additional SDU Study process steps that were tied to the NYISO’s previous study structure. The tariff revisions for the Additional SDU Study requirements are described in Part VII.D.iv of the cover letter.
40.15.1	ISO Provision of Description and Project Cost Allocation of CTOAFs, SUFs, and SDUs	Attach. S § 25.8.1	Retained existing tariff requirements for Final Decision Period, with certain revisions to: (i) relocate language concerning maximum CRIS rights to be consolidated with the Interconnection Service rules in Section 40.5.6, and (ii) to require developers post security for their share of Connecting Transmission Owner’s Attachment Facilities and Distribution Upgrades, which requirement is described in Part VII.D.iii of the cover letter.
40.15.2	Decision Rounds in the Final Decision Period for the Cluster	Attach. S § 25.8.2	Retained existing tariff requirements for the Final Decision Period, with certain revisions to: (i) revise Section 40.15.2.1 to improve readability of provision, (ii) remove timing requirements tied to prior

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
	Study and the Additional SDU Study Decision Period for the Additional SDU Study		NYISO study process, (iii) establish a 10% threshold above which developers will have an opportunity in the next decision round to elect anew whether to accept their project cost allocation, (iv) eliminate option for developer to defer whether to accept its cost allocation for upgrades required to obtain ERIS until an Additional SDU Study, (v) relocate definition of Security to definitions section in 40.1, (vi) clarify that security may need to be posted to Connecting Transmission Owner, Affected Transmission Owner, or Affected System Owner, (vii) make clarifications for the use of separate terms – Final Decision Period and Additional SDU Study Decision Period for these two different decision and settlement processes, and (viii) to tie these decision period requirements to the withdrawal and withdrawal penalty rules. Additional information is provided in Part VII.D.iii of the cover letter.
40.15.3	Revised Study Results	Attach. S § 25.8.3	Retained NYISO’s existing tariff requirements for revised study results.
40.15.4	Completion of Final Decision Period/ Additional SDU Study Decision Period and Refund of Interconnection Customer’s Deposits	Attach. S § 25.8.3	Retained NYISO’s existing tariff requirements for completing the Final Decision Period or Additional SDU Study Decision Period, with certain revisions to indicate which Interconnection Customers are eligible to then receive back their Study Deposit and Readiness Deposit 2, which is described in Part VII.D.iii of the cover letter.
40.15.4	Withdrawal Penalties	New	Established requirements for Withdrawal Penalties for Phase 2 Study process through Final Decision Period or Additional SDU Study Decision Period as described in Part VII.D.ii.b of the cover letter.
40.16.1	Forfeiture of Security	Attach. S § 25.8.5	Retained NYISO’s existing tariff requirements concerning Interconnection Customer’s security with certain revisions: (i) clarifying in the rules for holding security instances in which

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
			developer and Transmission Owner agree for developer to perform upgrade work outside of the Option to Build, and (ii) making certain revisions clarifying when the security may be forfeited and when the NYISO makes this determination as described in Part VII.E.iv of the cover letter.
40.16.2	No Interconnection Customer Responsibility for Future Upgrades	Attach. S § 25.9.2	Retained NYISO's existing tariff requirements.
40.16.3	Interconnection Customer's Future Cost Responsibility	Attach. S § 25.8.6	Retained the NYISO's existing tariff requirements for allocating the costs of future costs differences from the cost estimates in the Cluster Study for which Interconnection Customer provided security and actual costs, with limited revisions: (i) to account for Small Generating Facilities that accepted their cost allocation and posted security, (ii) for any updated cost estimate and security amount determined in an Cost Estimate Update for a developer to extend the Commercial Operation Date for its project, as described in Part VII.E.i.b of the cover letter, and (iii) to align the reference to the dispute resolution procedures that will apply to all disputes arising under the Standard Interconnection Procedures.
40.17.1	Headroom Accounting	Attach. S § 25.8.7	Retained the NYISO's existing tariff requirements with limited changes: (i) to clarify applicability of the provisions to Distribution Upgrades and Affected System Operators, and (ii) to remove an outdated reference to a settlement impacting Class Year 2001 and 2002.
40.17.2	Headroom Account Adjustments in the CBA	Attach. S § 25.8.8	Retained NYISO's existing tariff requirements.
40.17.3	Rate Base Facilities	Attach. S § 25.8.9	Retained NYISO's existing tariff requirements.

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
40.18.1	ERIS Election and future Evaluation for CRIS	Attach. S § 25.9.1	Retained NYISO's existing tariff requirements, with clarification that the NYISO will perform evaluations for CRIS under Attachment HH.
40.18.2	CRIS Rights	Attach. S § 25.9.3	Retained NYISO's existing tariff requirements concerning CRIS rights, with limited revisions: (i) to replace an effective date placeholder with the appropriate date previously accepted by the Commission, and (ii) to clarify that External CRIS Rights will be addressed through Cluster Study Process.
40.18.3	Transfer of Deliverability Rights - Same Location	Attach. S § 25.9.4	Retained the NYISO's existing tariff requirements.
40.18.4	Transfer of Deliverability Rights - Different Locations	Attach. S § 25.9.5	Retained the NYISO's existing tariff requirements, with limited revisions to clarify that CRIS transfers will be addressed in the Cluster Study Process.
40.18.5	Transfer of External CRIS Rights	Attach. S § 25.9.6	Retained the NYISO's existing tariff requirements, with limited revisions to replace reference to the Class Year Start Date under NYISO's existing process with the close of the Application Window in the new process.
40.19.1	Study Start Date	Attach. S § 25.5.9.2	Retained the NYISO's existing tariff requirements for Expedited Deliverability Study, with limited revision to remove outdated language concerning the performance of the first Expedited Deliverability Study.
40.19.2	Study Entry Requirements and Schedule	Attach. S § 25.5.9.2	Retained the NYISO's existing tariff requirements for Expedited Deliverability Study, with limited revision consistent with NYISO's existing deliverability study rules that a project cannot be assessed simultaneously in the Cluster Study Process and an Expedited Deliverability Study.

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
40.19.3	Expedited Deliverability Study Agreement and Invoicing of Study Costs	Attach. S § 25.5.9.2.2	Retained the NYISO's existing tariff requirements for Expedited Deliverability Study, with limited tariff revision to align the NYISO's invoicing requirements across all studies in the Standard Interconnection Procedures, as described in Part VIII.B of the cover letter.
40.19.4	No Prioritization of Projects in an Expedited Deliverability Study	Attach. S § 25.5.8	Retained the NYISO's existing tariff requirements for Expedited Deliverability Study.
40.19.5	Expedited Deliverability Study Procedures	Attach. S § 25.5.9.2.3	Retained the NYISO's existing tariff requirements for Expedited Deliverability Study, with limited revisions: (i) to explicitly tie the provision with the rules for performing an Expedited Deliverability Study in Section 40.13 and (ii) to replace the milestones under the NYISO's existing process in which the study cannot proceed in parallel with the Class Year Study with milestones applicable to the new study process.
40.19.6	Expedited Deliverability Study Decision Process	Attach. S § 25.5.9.2.4	Retained the NYISO's existing tariff requirements for Expedited Deliverability Study.
40.20	Engineering & Procurement ("E&P") Agreement	Attach. X § 30.9	Retained the NYISO's existing tariff requirements for engineering and procurement agreements.
40.21.1	Tender	Attach. X § 30.11.1	Revised NYISO's process for tendering interconnection agreements to incorporate rules for tendering construction agreements as described in Part VII.E.ii.c of the cover letter.
40.21.2	Negotiation	Attach. X § 30.11.2	Revised NYISO's process for negotiating interconnection agreements to incorporate rules for negotiating construction agreements as described in Part VII.E.iii of the cover letter, and revised 6 month

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
			negotiation period with 180 calendar days, which can be calculated more accurately.
40.21.2.1	Delay in Standard Interconnection Agreement Execution, or Filing Unexecuted, to Await Affected System Study Report from External Affected System	New	Inserted requirements from updated FERC pro forma LGIP 11.2.1.
40.21.2.2	Identification of Contingent Facilities	Attach. X § 30.3.7	Retained NYISO's existing tariff requirements on Contingent Facilities.
40.21.3	Execution and Filing	Attach. X § 30.11.3	Retained NYISO's existing tariff requirements for execution and filing of interconnection agreements, with revisions to: (i) incorporate the related rules for execution and filing of construction agreement, and (ii) revise the date for the developer to confirm continued Site Control and demonstrate reasonable evidence of satisfying prescribed milestones, which revisions are described in Part VII.E.ii.c of the cover letter.
40.21.4	Negotiation and Execution of Standard Interconnection Agreement Prior to Completion of the Cluster Study	Attach. X § 30.11.4	Retained NYISO's existing tariff requirements by which developer can request negotiation and execution of interconnection agreement prior to completion of NYISO's interconnection process, with revisions to address when in new process developer can request NYISO tender interconnection agreement as described in Part VII.E.ii.c of the cover letter.
40.21.5	Commencement of Interconnection Activities	Attach. X § 30.11.5	Retained existing tariff requirements for commencement of interconnection activities, as revised to include commencement of activities under the construction agreement.

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
40.21.6	Termination of the Standard Interconnection Agreement	Attach. X § 30.11.6	Retained existing tariff requirements for termination of the Standard Interconnection Agreement, with limited revision to account for termination due to a Class Year Transmission Project or Cluster Study Transmission Project ceasing operation.
40.22.1	Schedule	Attach. X § 30.12.1	Retained existing tariff requirements for construction of attachment facilities and upgrades, with limited revisions to: (i) provide for Affected Transmission Owners and Interconnection Customers to negotiate a schedule for construction in good faith, and (ii) to replace reference to an engineering, procurement, and construction agreement, as the parties will use the new <i>pro forma</i> construction agreement(s).
40.22.2	Construction Sequencing	Attach. X § 30.12.2	Retained existing tariff requirements concerning construction sequencing.
40.22.3	Provisional Interconnection Service	Attach. X § 30.12.3	Retained existing tariff requirements concerning provisional interconnection service.
40.23	Fast Track Process	Attach. Z § 32.2	Retained existing tariff requirements for Fast Track Process, with limited revision to clarify that if this request is withdrawn, the developer may proceed by submitting an Interconnection Request in the Cluster Study Process.
40.23.1	Applicability	Attach. Z § 32.2.1	Retained existing tariff requirements for Fast Track Process.
40.23.2	Initial Review	Attach. Z § 32.2.2	Retained existing tariff requirements for Fast Track Process, with limited revision to require use of the Fast Track Process request form in Appendix 13 to Attachment HH as described in Part X.A.ii of the cover letter.
40.23.2.1	Screens	Attach. Z § 32.2.2.1	Retained existing tariff requirements for Fast Track Process.

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
40.23.3	Customer Options Meeting	Attach. Z § 32.2.3	Retained existing tariff requirements for Fast Track Process, with limited revision to remove requirement that projects that fail screens proceed to the study process in the NYISO's Small Generator Interconnection Procedures.
40.23.4	Supplemental Review	Attach. Z § 32.2.4	Retained existing tariff requirements for Fast Track Process, with limited revisions: (i) to align invoicing and deposit rules for this process with the uniform requirements for the Standard Interconnection Procedures, (ii) to remove requirement that projects that fail screens proceed to the study process in the NYISO's Small Generator Interconnection Procedures, and (iii) to clarify that projects that fails the Fast Track Process screens will be withdrawn; such projects may propose the project in a subsequent Cluster Study Process.
40.24.1	Confidentiality	Attach. X § 30.13.1	Retained NYISO's existing tariff requirements for confidentiality
40.24.2	Delegation of Responsibility	Attach. X § 30.13.2	Retained NYISO's existing tariff requirements for delegation of responsibility.
40.24.3.1	Obligation to Pay under Standard Interconnection Procedures	Attach. X § 30.13.3.1	Revised tariff requirement describing developer's study cost responsibility as described in Part VII.D.vii.a of the cover letter.
40.24.3.2	Study Cost Allocation	Attach. X § 30.13.3.1	Revised tariff requirements describing study cost allocation and the allocation of other studies under the Standard Interconnection Procedures as described in Part VII.D.vi of the cover letter.
40.24.3.3	Obligation to Pay Withdrawal Penalties and Application of Withdrawal Penalties	New	Established tariff requirements for invoicing for Withdrawal Penalties and the use of deposits as described in Part VII.D.vii.d of the cover letter.

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
40.24.3.4	Invoicing and Payment	Attach. X § 30.13.3.1	Revised invoicing and payment tariff requirements as described in Part VII.D.vii of the cover letter.
40.24.4	Third Parties Conducting Studies	Attach. X § 30.13.4	Revised requirements for third party conducting studies to remove requirements tied to prior study process and to remove option for developer to use third party to perform study as described in Part VII.D.i of the cover letter.
40.24.5	Disputes	Attach. X § 30.13.5	Retained existing dispute provisions, with limited revisions: (i) to provide that, in the event of a dispute in which it is not a party, it will still participate solely for purposes of assisting the other parties in resolving the claim or dispute as described in Part VII.D.i of the cover letter, and (ii) to add System Deliverability Upgrades as one of the type of facilities for which a final decision by an arbitrator would trigger requirement to file at FERC.
40.24.6	Local Furnishing Bonds and Other Tax-Exempt Financing	Attach. X § 30.13.6	Retained existing tariff requirements.
40.25.1 Appendix 1	Interconnection Request	Attach. X § 30.14, Appx 1; Attach. X Appx 2 Att. B	Retained its existing Interconnection Request form, with the following revisions: (i) to incorporate the information that it currently obtains from the attachment to its existing Class Year Study Agreement; (ii) to update the form to align with the information and materials that must be submitted with the form as set forth in 40.5; (iii) to make certain additional modifications to information prompts to improve the usefulness of the requested information; (iv) to insert required information for non-synchronous generating facilities adopted in Order No. 2023, and (v) to include an attestation from an authorized person or officer of the Interconnection Customer confirming the submitted information is accurate and that the developer will be responsible for its study costs. The NYISO did not retain the terms and conditions included in its current Interconnection

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
			Request form as developer will enter into Cluster Study Agreement with applicable terms.
40.25.2 Appendix 2	CRIS-Only Request	New	Established new request form for use for CRIS-Only Request, including adopting information prompts from NYISO's current Interconnection Request and External CRIS Request form that is an attachment to its current Class Year Study Agreement. NYISO also included with form an attestation from an authorized person or officer of the Interconnection Customer confirming the submitted information is accurate and that the developer will be responsible for its study costs.
40.25.3 Appendix 3	Cluster Study Agreement	Attach. X Appx 2	Revised the NYISO's existing Class Year Study Agreement as described in Part VII.B.iv in the cover letter.
40.25.4 Appendix 4	Pre-Application Request Form/ Pre-Application Report	New	Established form for developer to request a Pre-Application Report and the template for the report as described in Part VIII.A.ii in the cover letter.
40.25.5 Appendix 5	Facility Modification Form	Attach. X Appx 3	Revised Facility Modification Form to align with revisions to the NYISO's modification requirements and to update terms and conditions to align with the uniform terms and conditions applied across the study agreements in Attachment HH.
40.25.6 Appendix 6	Two-Party Affected System Study Agreement	New	Established new study agreement based on FERC pro forma agreement as described in Part IX.D.ii in the cover letter.
40.25.7 Appendix 7	Multiparty Affected System Study Agreement	New	Established new study agreement based on FERC pro forma agreement as described in Part IX.D.ii in the cover letter.
40.25.8 Appendix 8	Expedited Deliverability Study Agreement	Attach. S Appx 2	Revised Expedited Deliverability Study Agreement to align with the uniform terms and conditions applied across the study agreements in Attachment HH, to update its information requests to account for multi-unit facilities requesting CRIS, and to eliminate certain

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
			information requests no longer required by the NYISO to perform its analysis.
40.25.9 Appendix 9	Allocation of Overage Costs	Attach. S Appx 1	Retained NYISO's existing example of cost allocation requirements.
40.25.10 Appendix 10	Certification of Equipment Packages for Generating Facilities 20 MW or Less	Attach. Z Appx 4	Retained NYISO's existing requirements used in connection with 10 kW Inverter Process.
40.25.11 Appendix 11	Certification Codes and Standards	Attach. Z Appx 3	Retained NYISO's existing codes and standards used in connection with 10 kW process.
40.25.12 Appendix 12	Application, Procedures, and Terms and Conditions for Interconnecting a Certified Inverter-Based Generating Facility No Larger than 10 kW ("10 kW Inverter Process")	Attach. Z Appx 5	Retained NYISO's existing tariff requirements for the 10 kW Inverter Process.
40.25.13 Appendix 13	Fast Track Request	New	Established a request form for the Fast Track Process using the NYISO's existing Small Generator Interconnection Request form, as that form is how these requests are currently made, as described in Part X.A.ii of the cover letter.
40.25.14 Appendix 14	Reserved	New	NYISO did not include in new Attachment HH the Interconnection Procedures for a Wind Generating Facility included in Appendix 5 of the Large Facility Interconnection Procedures in Attachment X to the NYISO OATT as such requirements are outdated and now addressed through the information submitted in the Interconnection Request.

Att. HH Section	Title	Current NYISO OATT Provisions	NYISO Proposed Tariff Changes
40.25.15 Appendix 15	Standard Interconnection Agreement	Attach. X Appx 4	Retained existing <i>pro forma</i> interconnection agreement as revised to align with new Standard Interconnection Procedures as described in Part VII.E.ii of the cover letter.
40.25.16 Appendix 16	Standard Upgrade Construction Agreement	New	Established new <i>pro forma</i> single developer construction agreement to address construction of upgrades identified in Standard Interconnection Procedures not addressed in Standard Interconnection Agreement, as described in Part VII.E.iii of the cover letter.
40.25.17 Appendix 17	Standard Multiparty Upgrade Construction Agreement	New	Established new <i>pro forma</i> multiple developer construction agreement to address construction of upgrades identified in Standard Interconnection Procedures not addressed in Standard Interconnection Agreement, as described in Part VII.E.iii of the cover letter.