

Attachment II

**NYISO Proposed Variations from Order No. 2023 Revisions to
Commission’s Pro Forma Interconnection Procedures and Agreements**

The Commission directed transmission providers to offer an item-by-item justification of each variation from the pro forma provisions that were modified in Order No. 2023.¹ The NYISO provides the below table detailing its proposed revisions from the changes to the Commission’s *pro forma* interconnection procedures and agreements adopted in Order No. 2023 and Order No. 2023-A, with reference to the additional detail included in the cover letter. For purposes of the table, the NYISO did not reference the edits in the Commission’s order to remove the word “the” before transmission provider or interconnection customer, to add “of this LGIP” to cross references, to lowercase the terms section or article, to update internal cross references, or to spell out numbers of days and capitalize, as applicable, calendar or business days.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
Commission’s Pro Forma Standard Large Generator Interconnection Procedures		
1	Inserted new defined term “Affected System Facilities Construction Agreement”	NYISO proposes to include this term in OATT Section 40.1 as retitled “Standard Upgrade Construction Agreement” and as revised to address the NYISO’s proposed use of the agreement as described in Part VII.E.iii of the cover letter.
1	Inserted new defined term “Affected System Interconnection Customer”	NYISO proposes to include this term in OATT Section 40.1 as revised to reference New York State Transmission System
1	Inserted new defined term “Affected System Network Upgrades”	NYISO proposes to include this term in OATT Section 40.1 as revised to reference New York State Transmission System.
1	Inserted new defined term “Affected System Queue Position”	NYISO proposes to include this term in OATT Section 40.1 as revised to account for NYISO’s Queue Position requirements, as described in Part VII.B.v of the cover letter.
1	Inserted new defined term “Affected System Study”	NYISO proposes to include this term in OATT Section 40.1 as revised to address the NYISO’s proposed revisions to the Affected System Study rules as described in Part IX.D of the cover letter.

¹ Order No. 2023-A at P 79.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1	Inserted new defined term “Affected System Study Agreement”	NYISO proposes to include this term in OATT Section 40.1 with limited revisions to include NYISO’s terminology and appropriate cross references for OATT Attachment HH.
1	Inserted new defined term “Affected System Study Report”	NYISO proposes to include this term in OATT Section 40.1 with limited revisions to clarify NYISO issuing report and to use appropriate cross references for OATT Attachment HH.
1	Deleted term “Applicable Reliability Council”	NYISO proposes to retain this term in OATT Section 40.1, which term in the NYISO’s tariffs applies not only to NERC, but also to the Northeastern Power Coordinating Council and New York State Reliability Council.
1	Revised defined term “Applicable Reliability Standards”	NYISO’s requirements include separate term Applicable Reliability Requirements, which NYISO is proposing to use in OATT Section 40.1 in place of Applicable Reliability Standards as described in Part VII.D.i of the cover letter.
1	Inserted new defined term “Balancing Authority”	NYISO proposes to include term in Section 40.1 of Attachment HH.
1	Inserted new defined term “Balancing Authority Area”	NYISO proposes to include term in Section 40.1 of Attachment HH.
1	Inserted new defined term “Cluster”	NYISO proposes to include term in Section 40.1 of Attachment HH, with limited revision to clarify term applies to projects with validated Interconnection Requests and CRIS-Only Requests
1	Inserted new defined term “Cluster Request Window”	NYISO proposes to include term in Section 40.1 of Attachment HH as retitled “Application Window” and with appropriate cross references in Attachment HH.
1	Inserted new defined term “Cluster Restudy”	NYISO proposes not to include this term as NYISO’s process will not include this process step.
1	Inserted new defined term “Cluster Restudy Report Meeting”	NYISO proposes not to include this term as NYISO’s process will not include this process step.
1	Inserted new defined term “Cluster Restudy Report”	NYISO proposes not to include this term as NYISO’s process will not include this process step.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1	Inserted new defined term “Cluster Study”	NYISO proposes to include in OATT Section 40.1 a defined term “Cluster Study” as revised to describe the NYISO’s proposed Cluster Study which differs from the Order No. 2023 Cluster Study.
1	Inserted new defined term “Cluster Study Agreement”	NYISO proposes to include in OATT Section 40.1 a defined term “Cluster Study Agreement” as revised with appropriate cross references in Attachment HH.
1	Inserted new defined term “Cluster Study Process”	NYISO proposes to include the Cluster Study Process term in Section 40.1 of Attachment HH, as revised to account for the process steps proposed by the NYISO.
1	Inserted new defined term “Cluster Study Report”	NYISO proposes to include the Cluster Study Report term in Section 40.1 of Attachment HH, as revised to account for the appropriate process step and appropriate cross references in Attachment HH.
1	Inserted new defined term “Cluster Study Report Meeting”	NYISO proposes not to include this term as it is not included as part of NYISO’s proposed process.
1	Revised defined term “Clustering”	NYISO proposes to revise this defined term in OATT Section 40.1 to describe clustering in the context of Affected System Studies, where the term is used in the NYISO’s Attachment HH.
1	Inserted new defined term “Commercial Readiness Deposits”	NYISO proposes to include term in Section 40.1 as retitled “Readiness Deposits” with reference to NYISO’s proposed Readiness Deposit 1 and Readiness Deposit 2.
1	Revised defined term “Contingent Facilities”	NYISO does not propose to adopt Order No. 2023 edits to this term, as edits are to pro forma language not included in NYISO’s requirements as previously accepted by the Commission. NYISO proposes revisions to this defined term in OATT Section 40.1 to update the references to its new process.
1	Deleted defined term “Control Area”	NYISO proposes not to incorporate term “Control Area” in its new OATT Attachment HH.
1	Inserted defined term “Customer Engagement Window”	NYISO proposes to include “Customer Engagement Window” term in Section 40.1 of Attachment HH, with limited revision to use appropriate cross references in Attachment HH.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1	Inserted defined term “Electric Reliability Organization”	NYISO proposes to include Order No. 2023 term “Electric Reliability Organization” in OATT Section 40.1 with limited revision to add “ERO” shortened form with definition.
1	Revised defined term “Generating Facility”	NYISO proposes to insert Order No. 2023 change to Generating Facility definition to make device plural. NYISO also proposes to consolidate into the definition in OATT Section 40.1 its existing language from prior term “Large Generating Facility” previously accepted by Commission detailing multiple resources behind the same POI.
1	Revised defined term “Generating Facility Capacity”	NYISO proposes to include Order No. 2023 revisions to term Generating Facility Capacity in OATT Section 40.1.
1	Revised defined term “Interconnection Facilities Study”	NYISO proposes not to include term or revisions to term “Interconnection Facilities Study,” which the NYISO does not propose as a separate process step in its new process.
1	Inserted defined term “Interconnection Facilities Study Report”	NYISO proposes not to include term “Interconnection Facilities Study Report” which is already addressed in NYISO’s process as Cluster Study Report
1	Deleted defined term “Interconnection Feasibility Study”	NYISO proposes not to incorporate term “Interconnection Feasibility Study” in its new OATT Attachment HH.
1	Deleted defined term “Interconnection Feasibility Study Agreement”	NYISO proposes not to incorporate term “Interconnection Feasibility Study Agreement” in its new OATT Attachment HH.
1	Revised defined term “Interconnection Study”	NYISO proposes not to incorporate term “Interconnection Study” in its new OATT Attachment HH, which is already addressed in NYISO’s proposed process by “Cluster Study”.
1	Deleted defined term “Interconnection System Impact Study”	NYISO proposes not to incorporate term “Interconnection System Impact Study” in its new OATT Attachment HH, as the NYISO does not propose as a separate process step in its new process.
1	Deleted defined term “Interconnection System Impact Study Agreement”	NYISO proposes not to incorporate term “Interconnection System Impact Study” in its new OATT Attachment HH.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1	Inserted defined term “LGIA Deposit”	NYISO proposes not to incorporate term “LGIA Deposit” in its new OATT Attachment HH as the NYISO’s proposed process does not use the LGIA Deposit as described in Part VII.E.ii of the cover letter,
1	Revised defined term “Loss”	NYISO proposes not to incorporate term “Loss” in its new OATT Attachment HH, as the term is not used in the NYISO’s Standard Interconnection Procedures.
1	Revised defined term “Material Modification”	NYISO proposes to include the Order No. 2023 revisions to the term “Material Modification” in OATT Section 40.1.
1	Inserted defined term “Multiparty Affected System Facilities Construction Agreement”	NYISO proposes to include this term in OATT Section 40.1 as retitled “Standard Multiparty Upgrade Construction Agreement” and as revised to address the NYISO’s proposed use of the agreement as described in Part VII.E.iii of the cover letter.
1	Inserted defined term “Multiparty Affected System Study Agreement”	NYISO proposes to include this term in OATT Section 40.1 with limited revisions to use appropriate cross references in Attachment HH.
1	Deleted defined term “NERC”	NYISO proposes not to incorporate term “NERC” in its new OATT Attachment HH.
1	Revised defined term “Optional Interconnection Study Agreement”	NYISO proposes not to incorporate term “Optional Interconnection Study Agreement” as the study is not included in NYISO’s proposed new process.
1	Inserted defined term “Proportional Impact Method”	NYISO proposes to include this term in OATT Section 40.1 with limited revisions to reference the NYISO’s tariff provisions for allocating upgrade costs.
1	Revised defined term “Provisional Large Generator Interconnection Agreement”	NYISO proposes to include Order No. 2023-A revision to insert “Standard” in definition.
1	Revised defined term “Queue Position”	NYISO proposes revisions to definition of “Queue Position” in OATT Section 40.1 as described in Part VII.B.v of the cover letter.
1	Revised defined term “Scoping Meeting”	NYISO proposes revisions to the definition of “Scoping Meeting” in OATT Section 40.1 to align with its proposed meeting requirements as described in Part VII.C.iv of the cover letter.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1	Revised defined term “Site Control”	NYISO proposes revisions to the definition of “Site Control” in OATT Section 40.1 as described in Part VII.B.iii.c of the cover letter.
1	Revised defined term “Stand-Alone Network Upgrades”	NYISO proposes to adopt the Order No. 2023 revisions to its comparable term “Stand Alone System Upgrade Facilities” to adopt the change to Business Days for addressing disputes concerning stand-alone facilities.
1	Inserted new defined term “Substation Network Upgrades”	NYISO proposes not to include term “Substation Network Upgrades,” which is already addressed in NYISO tariff with the term Local System Upgrade Facilities.
1	Revised defined term “Surplus Interconnection Service”	NYISO proposes not to include term “Surplus Interconnection Service,” which services is not provided under NYISO tariffs, as described in Part XII.C of the cover letter.
1	Inserted new defined term “System Network Upgrades”	NYISO proposes not to include term “System Network Upgrades,” which is already addressed in NYISO tariff with, as applicable, terms “System Upgrade Facilities” or “non-Local System Upgrade Facilities.”
1	Inserted new defined term “Transitional Cluster Study”	NYISO proposes to include Order No. 2023 term “Transitional Cluster Study” in OATT Section 40.1, as revised as applicable to “Transition Cluster Study Process” or “Transition Cluster Study.”
1	Inserted new defined term “Transitional Cluster Study Agreement”	NYISO does not propose to include term “Transitional Cluster Study Agreement,” which agreement is covered by the “Cluster Study Agreement” in NYISO’s process.
1	Inserted new defined term “Transitional Cluster Study Report”	NYISO does not propose to include term “Transitional Cluster Study Report,” which report is covered by the “Cluster Study Report” in the NYISO’s process.
1	Inserted new defined term “Transitional Serial Interconnection Facilities Study”	NYISO does not propose to include the term “Transitional Serial Interconnection Facilities Study,” which is not a process step in the NYISO’s proposed process.

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1	Inserted new defined term “Transitional Serial Interconnection Facilities Study Agreement”	NYISO does not propose to include the term “Transitional Serial Interconnection Facilities Study Agreement,” which does not concern a process step in the NYISO’s proposed process.
1	Inserted new defined term “Transitional Serial Interconnection Facilities Study Report”	NYISO does not propose to include the term “Transitional Serial Interconnection Facilities Study Report,” which does not concern a process step in the NYISO’s proposed process.
1	Inserted defined term “Transitional Withdrawal Penalty”	NYISO does not propose to include the term “Transitional Withdrawal Penalty,” as NYISO’s proposed process uses same penalty rules for transition and subsequent clusters.
1	Inserted defined term “Withdrawal Penalty”	NYISO proposes to include the term “Withdrawal Penalty” in Section 40.1 of Attachment HH with limited revisions to align with NYISO defined terms and appropriate cross references in Attachment HH.
2.2	Revised Comparability section to remove Reasonable Efforts language	NYISO proposes to include Order No. 2023 revisions to Comparability provision in Section 40.2.5.
2.3	Capitalized “Interconnection Study”	NYISO’s existing Base Case Data provision includes Class Year Study in place of interconnection study. NYISO proposes to retain its previously accepted language in Section 40.2.6 of Attachment HH of the OATT with the addition for the NYISO’s new process of “or Cluster Study, as applicable”
3.1.1.1	Revised Interconnection Request rules to insert Study Deposit requirements	NYISO proposes to consolidate all of its Interconnection Request and CRIS-Only Request submission requirements in a single location in Sections 40.5.4 and 40.5.5 of Attachment HH to the OATT. The NYISO also proposes variations from the Study Deposit requirements as described in Part VII.B.iii.b of the cover letter.
3.1.2	Revised submission requirements for Interconnection Request, including rules for: (i) multiple generating facilities sharing single POI, (ii) rules for change in POI and selection of definitive POI, and (iii) rules for electric	NYISO proposes: (i) to retain its existing rules regarding multiple generation facilities at a single POI as described in Part XII.A of the cover letter; (ii) to require a definitive POI be provided with the Interconnection Request with limited exception as described in Part VII.B.iii.d of the cover letter, and (iii) not to include the operating

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	storage resource to provide operating assumptions.	assumption rules for electric storage resources as described in Part XII.D of the cover letter.
3.2.1.2	Revised Energy Resource Interconnection Service study rules to insert rules for energy system resources requesting to use operating assumptions.	NYISO proposes not to include the operating assumption rules for electric storage resources as described in Part XII.D of the cover letter.
3.2.2.1, 3.2.2.2	Revised Network Resource Interconnection Services study rules to insert rules for energy system resources requesting to use operating assumptions. Corrected an inadvertent capitalization.	NYISO proposes not to include the operating assumption rules for electric storage resources as described in Part XII.D of the cover letter. In addition, the corrected inadvertent capitalization was not included in the NYISO's Commission-accepted variation from this provision.
3.3.1	Revised Surplus Interconnection Service rules	NYISO proposes not to include surplus interconnection service requirements as such service not provided under its rules as described in Part XII.C of the cover letter.
3.4.1	Inserted rules for Cluster Request Window	NYISO proposes revisions to description of start date and duration of Application Window in Sections 40.5.1, 40.5.3, 40.5.4 of Attachment HH to the OATT as described in Part VII.B of the cover letter.
3.4.2	Revised rules for initiating an Interconnection Request, including adding or revising rules on: (i) study deposit, (ii) Site Control, (iii) Generating Facility Capacity, (iv) operating assumption for electric storage resources, (v) commercial readiness deposit, (vi) POI, (viii) interconnection service, and (ix) permitting use of surety bond or other form of security reasonably acceptable to transmission provider.	NYISO proposes to include consolidated list of information and materials that must be submitted with an Interconnection Request or CRIS-Only Request in Section 40.5.5 of Attachment HH to the OATT, with proposed modifications to address its distinct process. The NYISO proposes variations concerning these requirements are set forth in Part VII.B.iii of the cover letter; its proposed variations concerning readiness deposits are described in Part VII.D.ii of the cover letter; its proposal not to include the electric storage resource operating assumptions is described in Part XII.D of the cover letter; and its proposed requirements for forms of security is described in Part VII.D.ii.a of the cover letter. Finally, the NYISO's existing tariff rules already establish, as included in the relocated interconnection service provisions in 40.5.6, the requirements by

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		which a developer can request service below is generating capacity (see, e.g., Section 40.5.6.3 for ERIS and 40.5.6.4 for CRIS elections).
3.4.4	Revised rules on interconnection request deficiencies	NYISO proposes revisions to the deficiencies requirements to provide additional time for its review, to clarify rules for developer's ability to cure, and to provide additional details concerning the scope and process for validation as set forth in Sections 30.5.7.1, 40.5.7.2, and 40.5.7.4, which revisions are described in Part VII.B.i of the cover letter.
3.4.5	Inserted requirements for Customer Engagement Window	NYISO proposes revisions to description of Customer Engagement Window in Section 40.7.1 of Attachment HH to the OATT to provide additional detail concerning duration of period as described in Part VII.C of the cover letter. In addition, NYISO proposes revisions to the posting of project list in Section 40.7.2 of Attachment HH to the OATT as described in Part VII.C.ii of the cover letter. NYISO also proposes revisions in Section 40.7.5 of Attachment HH to the OATT to clarify that projects completing the Customer Engagement Window will proceed to the first decision period, rather than directly to the cluster study or subject to withdrawal, as described in Part VII.D.i.d of the cover letter. Finally, NYISO proposes alternative requirements for the execution of the Cluster Study Agreement as described in Part VII.B.iv of the cover letter.
3.4.6	Revised scoping meeting requirements	NYISO proposes certain revisions to the group scoping meeting requirements in Section 40.7.4 of Attachment HH to the OATT to align the scope with its proposed interconnection process, as described in Part VII.C.iv of the cover letter. In addition, the NYISO proposes not to adopt changes for anonymity requirement as described in Part VII.C.iv of the cover letter.
3.5.1	Revised OASIS requirements	NYISO proposes to adopt Order No. 2023 deletion of "(combined cycle, bus load, or combustion turbine and fuel type)".

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3.5.2.1-3.5.4	Revised study metrics for updated studies	NYISO proposes revisions to the study metrics in 40.9.3 to align with its different study components as described in Part XI.C of the cover letter.
3.6	Revised Affected System rules	NYISO proposes revisions to the Affected System coordination rules in Section 40.8 of Attachment HH to the OATT to clarify impacts to Affected Systems in New York and those that are neighboring systems, as described in Part IX of the cover letter.
3.6.1-3.6.2	Inserted new requirements for notification of potential impacts to Affected Systems and notifications of restudies	NYISO proposes revisions to notification requirements in Section 40.8.2 of Attachment HH to the OATT to align with its distinct interconnection process steps as described in Part IX.C of the cover letter. NYISO proposes not to adopt requirements that it notify other regions of cluster restudies as its proposed process does not provide for restudies.
3.7	Revised withdrawal requirements	NYISO proposes revisions to withdrawal requirements in Section 40.6.4.3 of Attachment HH to the OATT to reference invoicing requirements concerning application of penalties as described in Part VII.D.vii.d of the cover letter.
3.7.1	Inserted Withdrawal Penalty rules	NYISO proposes revisions to the withdrawal penalty requirements as included in Sections 40.6.5, 40.7.6, 40.10.9, and 40.15.5 as described in Part VII.D.ii.b of Attachment HH to the OATT.
3.7.1.1	Inserted rules for calculating Withdrawal Penalties	NYISO proposes revisions to the withdrawal penalty requirements as included in Sections 40.6.5, 40.7.6, 40.10.9, and 40.15.5 as described in Part VII.D.ii.b of Attachment HH to the OATT.
3.7.1.2	Inserted rules for distribution of Withdrawal Penalties	NYISO proposes revisions to the penalty fund distribution requirements included in Section 40.6.5.2 as described in Part VII.D.ii.c of Attachment HH to the OATT.
3.8	Revised identification of Contingent Facilities section	NYISO's existing tariff language accepted by the Commission does not include reference to system impact study revised by Order No. 2023 edit.

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3.9	Inserted penalties for failure to meet study deadlines section	NYISO proposes to adopt study delay penalty requirements with certain variations as described in Part XI.B of the cover letter.
4	Inserted statement that once customer submits valid interconnection request, it is part of queue	NYISO proposes to adopt tariff language in Section 40.5.7.2.3, with limited revisions to clarify that such projects are already in the NYISO's Queue and would proceed when validated to further processing under the NYISO's procedures.
4.1	Revised assignment of Queue Position section	NYISO proposes revisions to Queue Position requirements included in Section 40.6.1.1 of Attachment HH to the OATT as described in Part VII.B.v of the cover letter.
4.1.2	Revised higher Queue Position section	NYISO proposes revisions to higher Queue Position requirements included in Section 40.6.1.2 of Attachment HH to the OATT as described in Part VII.B.v of the cover letter.
4.2	Deleted clustering section with certain revisions for general study process.	NYISO proposes consistent with this requirement not to retain its current clustering section for Attachment HH to the OATT.
4.2	Inserted General Study Process section, including use of cluster subgroups	NYISO proposes not to include the requirements for the implementation of the applicable regional transmission expansion plan which requirements concerning system impact studies that the NYISO is no longer performing. The NYISO proposes to adopt the language concerning cluster subgroups in Section 40.10.4.5 to Attachment HH and to specify that the requirements for any subgroup would be set forth in ISO Procedures.
4.2.1	Inserted rules for cost allocation for interconnection facilities and network upgrades	NYISO proposes revisions to the cost allocation requirements for interconnection facilities and upgrades as described in Part VII.D.v of the cover letter.
4.4	Revised modification provisions, including inserting rules for: (i) definitive POI, (ii) operating assumptions for electric storage resources, (iii) request to add generating facility at same POI, (iv) requiring modification include resulting updates to	NYISO proposes revisions to the modification provisions included in Section 40.6.3 of Attachment HH to the OATT as described in Part VII.E.i.a of the cover letter. In addition, NYISO proposes not to include electric storage resource operating assumption requirements as described in Part XII.D of the cover letter. Finally, NYISO propose to retain existing rules for generating facilities

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	models, (v) extensions of Commercial Operation Date.	interconnecting at the same POI as described in Part XII.A of the cover letter.
5.1	Inserted provisions for transition rules to new Cluster Study Process	NYISO proposes revisions to transition requirements included in Section 40.3 of Attachment HH to the OATT as described in Part X.B of the cover letter.
6	Deleted feasibility study rules	NYISO proposes not to include feasibility study rules in Attachment HH of the OATT.
6	Inserted requirements for publicly posted interconnection information (i.e., heatmap)	NYISO proposes revisions to heatmap requirements included in Section 40.4.1 of Attachment HH to the OATT as described in Part VIII.A.i of the cover letter.
7	Replaced system impact study rules with rules for cluster study	NYISO proposes not to include system impact study as described in Part VII.A.i of the cover letter; details of NYISO's proposed scope and procedures of its Cluster Study are included in Sections 40.10 and 40.11 of Attachment HH to the OATT and described in Part VII.D.i of the cover letter.
7.1-7.2	Revised rules for tender and execution of Cluster Study Agreement	NYISO proposes revisions to requirements for tendering and execution of Cluster Study Agreement included in Section 40.5.7.1.2 of Attachment HH to the OATT and described in Part VII.E.ii.c of the cover letter.
7.3	Revised rules for scope of Cluster Study, including inserting rules for: (i) evaluation at requested level of interconnection service, (ii) addressing operating assumptions for electric storage resources, (iii) assessing alternative technologies, and (iv) tendering a facilities study agreement.	NYISO proposes revisions to the Cluster Study scope requirements to align with its distinct Cluster Study as included in Sections 40.10 and 40.11 of Attachment HH and as described in Part VII.D.i of the cover letter. NYISO proposes to adopt the alternative technology requirements as included in Sections 40.11.5.1 and 40.11.4.2 and described in Part XII.E of the cover letter. NYISO proposes not to include electric storage resource operating assumption requirements as described in Part XII.D of the cover letter. NYISO proposes not to tender a facilities study agreement as those requirements are folded into its Cluster Study Agreement process.

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7.4	Inserted requirements that interconnection requests can only be submitted within cluster request window, removed reference to Reasonable Efforts, inserted 150 day period to perform cluster study, and established requirements for cluster study report meeting.	NYISO proposes revisions to align with its distinct Cluster Study rules, including the proposed duration of the study, as described in Part VII.D of the cover letter. NYISO proposes not to have a stand alone study report meeting; the Cluster Study results will be provided to developers and stakeholders for review and subject to acceptance by the NYISO's Operating Committee as described in Part VII.D.iv of the cover letter.
7.5	Inserted requirements for cluster restudies	NYISO proposes not to include cluster restudy requirements as this is not a process step in NYISO's proposed interconnection process as described in Part VII.D of the cover letter.
8.1	Revised facilities study requirements, including inserting requirements for interconnection facilities study agreement, commercial readiness deposit, demonstrating full site control, and addressing transmission provider of material change to site control	NYISO proposes revision to include its distinct Cluster Study included in Section 40.10 and 40.11 of Attachment HH to the OATT and described in Part VII.D.i of the cover letter. The NYISO proposes revisions to the commercial readiness requirements as described in Part VII.D.ii of the cover letter. In addition, the NYISO proposes revisions to the site control requirements as described in Part VII.B.iii.c of the cover letter. The NYISO also proposes to relocate the pro forma Site Control requirements in one location is Section 40.5.5.4 and 40.5.5.5 to be located near the Site Control submission rules.
8.1.1	Deleted requirement for monthly invoicing for facilities study	NYISO proposes to retain monthly invoicing as described in Part VII.D.vii.b of the cover letter.
8.2	Inserted rules for individual, non clustered facilities study and assessment of resources with electric storages resources that provided operating assumptions.	NYISO proposes not to perform a separate individual facilities study as described in Part VII.D to this cover letter. In addition, NYISO proposes not to include electric storage resource operating assumption rules as described in Part XII.D.
8.3	Revised facilities study procedures rules	NYISO proposes not to perform a separate individual facilities study as described in Part VII.D to this cover letter.
8.4	Revised meeting with transmission provider rules	NYISO proposes not to perform a separate individual facilities study as described in Part VII.D to this cover letter.

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8.5	Revised restudy rules	NYISO proposes not to perform a separate individual facilities study as described in Part VII.D to this cover letter.
9	Inserted Affected System Study rules	NYISO proposes to include the Order No. 2023 Affected System Study requirements, with certain revisions, which are included in Section 40.8 and described in Part IX of the cover letter.
10.1	Revised optional interconnection study rules	NYISO proposes not to include optional interconnection studies as a process step in Attachment HH as the NYISO is removing the related stand alone system impact study as described in Part VII.A.i of the cover letter.
11.1	Inserted rules for 60 day negotiation period and rules for awaiting Affected System Study report	NYISO proposes revisions to interconnection agreement negotiation period as described in Part VII.E.ii.c of the cover letter.
11.2.1	Inserted rules for delay in executing interconnection agreement to await Affected System Study report	NYISO proposes to include Order No. 2023 insert on delays in interconnection agreement execution while awaiting completion of Affected System Study as included in Section 40.21.2.1 of Attachment HH to the OATT, with limited revisions to include NYISO's terminology and appropriate cross references in Attachment HH.
11.3	Revised execution and filing requirements to: (i) revise when developer must demonstrate site control and milestones, (ii) provide for continued demonstration of site control, (iii) provide for LGIA deposit, and (iv) update description of milestones that must be demonstrated.	NYISO proposes revisions to the timing of the demonstration of Site Control and satisfaction of milestones as described in Part VII.E.ii.c of the cover letter. NYISO proposes not to include the LGIA Deposit as described in Part VII.E.ii.a of the cover letter.
12.2.4	Replaced system impact with cluster study report	NYISO proposes not to include this provision in Attachment HH as NYISO's proposed process does not include stand alone system impact study step as described in Part VII.A.i of the cover letter.
13.1.8-13.1.9	Corrected typo and replaced Control Area with Balancing Authority Area	NYISO proposes to correct typo identified in Order No. 2023-A in Section 40.24.1.8 of Attachment HH. NYISO's existing tariff

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		language accepted by the Commission does not include Control Area term revised in Order No. 2023.
13.3	Revised study cost provision to address allocation of study costs, payment responsibility for withdrawal of interconnection request, and failure of payment	NYISO proposes revisions to study cost requirements as described in Part VII.D.vi of the cover letter.
Appx 1	Revised interconnection request form to include electric storage resource operating assumption insert and models for non-synchronous generators	NYISO proposes revisions: (i) to modify the interconnection request from as described in Part VII.B.iii.f of the cover letter, and (ii) not to include the electric storage resource operating assumption requirements as described in Part XII.D of the cover letter.
Appx 2	Removed feasibility study agreement	NYISO proposes not to include feasibility study agreement in Attachment HH of the OATT.
New Appx 2	Revised system impact study agreement with cluster study agreement.	NYISO proposes not to include system impact study agreement in Attachment HH of the OATT. NYISO proposes to revise its existing Class Year Study Agreement as the new Cluster Study Agreement as described in Part VII.B.iv of the cover letter.
Appx 3 (formally Appx 4)	Revised facilities study agreement	NYISO proposes not to include a facilities study agreement in Attachment HH of the OATT. NYISO proposes to revise its existing Class Year Study Agreement as the new Cluster Study Agreement as described in Part VII.B.iv of the cover letter.
Appx 4 (formally Appx 5)	Revised optional interconnection study agreement	NYISO proposes not to include optional interconnection study agreement in Attachment HH as NYISO proposes not to include such study in Attachment HH.
Appx 7	Inserted new transitional cluster study agreement	NYISO proposes not to include a transitional cluster study agreement in Attachment HH as NYISO proposes that Interconnection Customers use the Cluster Study Agreement for the Transition Cluster Study Process as described in Part X.B.i of the cover letter.
Appx 8	Inserted new transitional serial interconnection facilities study agreement	NYISO did not include transitional cluster study agreement in Attachment HH as NYISO proposes that Interconnection Customers

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
		use the Cluster Study Agreement for the Transition Cluster Study Process as described in Part X.B.i of the cover letter.
Appx 9	Inserted new two-party affected system study agreement	NYISO proposes to include Order No. 2023's two-party affected system study agreement, with certain revisions, as described in Part IX.D.ii of the cover letter.
Appx 10	Inserted new multiparty affected system study agreement	NYISO proposes to include Order No. 2023's multiparty affected system study agreement, with certain revisions, as described in Part IX.D.ii of the cover letter.
Appx 11	Inserted new two-party affected system facilities construction agreement	NYISO proposes to include an alternative Standard Upgrade Construction Agreement as described in Part IX.D.v of the cover letter.
Appx 12	Inserted new multiparty affected system facilities construction agreement	NYISO proposes to include an alternative Standard Multiparty Upgrade Construction Agreement as described in Part IX.D.v of the cover letter.
Commission's Pro Forma Standard Large Generator Interconnection Agreement		
1	Deleted defined term "Applicable Reliability Council"	NYISO proposes to retain this term, which in the NYISO's tariffs applies not only to NERC, but also to the Northeastern Power Coordinating Council and New York State Reliability Council.
1	Revised defined term "Applicable Reliability Standards"	NYISO's requirements include separate term Applicable Reliability Requirements, which NYISO is proposing to use in addition to Applicable Reliability Standards as described in Part VII.D.i.a of the cover letter.
1	Inserted defined term "Balancing Authority"	NYISO proposes to include this term in Art. 1 of its Standard Interconnection Agreement.
1	Inserted defined term "Balancing Authority Area"	NYISO proposes to include this term in Art. 1 of its Standard Interconnection Agreement.
1	Inserted defined term "Cluster"	NYISO proposes to include term in Section 40.1 of Attachment HH, with limited revision to clarify term applies to projects with validated Interconnection Requests and CRIS-Only Requests.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1	Inserted defined term “Cluster Restudy”	NYISO proposes not to adopt this term as NYISO’s process will not include this process step.
1	Inserted defined term “Cluster Study”	NYISO proposes to include a defined term “Cluster Study” as revised to describe the NYISO’s proposed Cluster Study which differs from the Order No. 2023 Cluster Study.
1	Revised defined term “Clustering”	NYISO proposes not to include this defined term as it is not used in the NYISO’s Standard Interconnection Procedures
1	Inserted defined term “Contingent Facilities”	NYISO does not propose to adopt Order No. 2023 edits to this term, as edits are to pro forma language not included in NYISO’s requirements as previously accepted by the Commission. NYISO proposes revisions to update in its existing definition the references to new process.
1	Deleted defined term “Control Area”	NYISO proposes not to include the defined term “Control Area” in the Standard Interconnection Agreement.
1	Inserted defined term “Electric Reliability Organization”	NYISO proposes to adopt Order No. 2023 term “Electric Reliability Organization” with limited revision to add “ERO” shortened form with definition.
1	Revised defined term “Generating Facility”	NYISO proposes to insert Order No. 2023 change to Generating Facility definition to make device plural. NYISO also proposes to consolidate into definition its existing language from prior term “Large Generating Facility” previously accepted by Commission detailing multiple resources behind the same POI.
1	Revised defined term “Generating Facility Capacity”	NYISO proposes to include Order No. 2023 revisions to term Generating Facility Capacity.
1	Revised defined term “Interconnection Facilities Study”	NYISO proposes not to include term or revisions to term “Interconnection Facilities Study,” which the NYISO does not propose as a separate process step in its new process.
1	Deleted defined term “Interconnection Feasibility Study”	NYISO proposes not to incorporate term “Interconnection Feasibility Study” in its Standard Interconnection Agreement.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1	Deleted defined term “Interconnection Feasibility Study Agreement”	NYISO proposes not to incorporate term “Interconnection Feasibility Study” in its Standard Interconnection Agreement.
1	Revised defined term “Interconnection Study”	NYISO proposes not to incorporate term “Interconnection Study” in its Standard Interconnection Agreement, which is already addressed in NYISO’s proposed process by “Cluster Study”.
1	Deleted defined term “Interconnection System Impact Study”	NYISO proposes not to incorporate term “Interconnection System Impact Study” in its Standard Interconnection Agreement, as the NYISO does not propose this study as a separate process step in its new process.
1	Deleted defined term “Interconnection System Impact Study Agreement”	NYISO proposes not to incorporate term “Interconnection System Impact Study” in its Standard Interconnection Agreement.
1	Inserted defined term “LGIA Deposit”	NYISO proposes not to incorporate term “LGIA Deposit” in its new Standard Interconnection Agreement as the NYISO’s proposed process does not use the LGIA Deposit as described in Part VII.E.ii.a of the cover letter.
1	Revised defined term “Material Modification”	NYISO proposes to adopt the Order No. 2023 revisions to the term “Material Modification”.
1	Deleted defined term “NERC”	NYISO proposes not to incorporate term “NERC” in its Standard Interconnection Agreement.
1	Inserted defined term “Proportional Impact Method”	NYISO proposes not to include term “Proportional Impact Method” in Standard Interconnection Agreement as the term is not used in the agreement.
1	Revised defined term “Provisional Large Generator Interconnection Agreement”	NYISO proposes to include Order No. 2023-A revision to insert “Standard” in definition.
1	Revised defined term “Queue Position”	NYISO proposes revisions to definition of “Queue Position” as described in Part VII.B.v of the cover letter.
1	Revised defined term “Scoping Meeting”	NYISO proposes not to insert term “Scoping Meeting” in its Standard Interconnection Agreement as the term is not used in the agreement.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1	Revised defined term “Site Control”	NYISO proposes to insert defined term “Site Control” in its Standard Interconnection Agreement.
1	Revised defined term “Stand Alone Network Upgrades”	NYISO proposes to adopt the Order No. 2023 revisions to its comparable term “Stand Alone System Upgrade Facilities” to adopt the change to Business Days for addressing disputes concerning stand-alone facilities.
1	Inserted defined term “Substation Network Upgrades”	NYISO proposes not to include term “Substation Network Upgrades,” which is already addressed in NYISO tariff with term Local System Upgrade Facilities.
1	Revised defined term “Surplus Interconnection Service”	NYISO proposes not to include the term “Surplus Interconnection Service,” which services is not provided under NYISO tariffs, as described in Part XII.C of the cover letter.
1	Inserted defined term “System Network Upgrades”	NYISO proposes not to adopt term “System Network Upgrades,” which is already addressed in NYISO tariff with, as applicable, terms “Distribution Upgrades,” “System Upgrade Facilities” or “non-Local System Upgrade Facilities.”
1	Inserted defined term “Withdrawal Penalty”	NYISO proposes not to insert term “Withdrawal Penalty” in its Standard Interconnection Agreement as the term is not used in the agreement.
5.1.3	Revised Option to Build requirements to address multiple developers shared responsibility for certain facilities	NYISO proposes to insert this language into Article 5.1.3. with limited revisions to use NYISO’s terminology for the applicable attachment facilities and upgrades and to provide for the developers to provide any agreement to both NYISO and the applicable Connecting Transmission Owner, which are both the transmission provider.
5.4	Revised Power System Stabilizers provision to replace Applicable Reliability Council with Electric Reliability Organization	Order No. 2023 edit is to language in Article 5.4 that is not included in the NYISO’s Commission-accepted variation from this provision.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
5.5	Updated defined term Interconnection Facilities Study/Agreement.	NYISO proposes revisions to this provision to reference the applicable study under the NYISO's distinct interconnection process in place of "Interconnection Facilities Study"
5.9.2	Revised Provisional Interconnection Service provision to replace NERC with Electric Reliability Organization	The Order No. 2023 edit is to language in Article 5.9.2 that is not included in the NYISO's Commission-accepted variation from this provision.
5.15	Corrected defined term Interconnection Facilities Study	Order No. 2023-A edit is to language in Article 5.15 that is not included in the NYISO's Commission-accepted variation from this provision.
7	Revised Metering provision to replace Applicable Reliability Council with Electric Reliability Organization	Order No. 2023 edit is to language in Article 7 that is not included in the NYISO's Commission-accepted variation from this provision.
8.4	Revised Provision of Data from a Variable Energy Resource provision.	Order No. 2023 edit is to a provision that is not included in the NYISO's Commission-accepted interconnection agreement.
9.1	Revised general Operations provision to replace Applicable Reliability Council with Electric Reliability Organization	Order No. 2023 edit is to language in Article 9 that is not included in the NYISO's Commission-accepted variation from this provision.
9.2	Revised Control Area Notification provision with Balancing Authority Area Notification with conforming revisions	Order No. 2023 edit is to a provision that is not included in the NYISO's Commission-accepted interconnection agreement.
9.4	Replaced Control Area with Balancing Authority Area	Order No. 2023 edit is to language in Article 9.4 that is not included in the NYISO's Commission-accepted variation from this provision.
9.6.1.1- 9.6.1.2	Replaced Control Area with Balancing Authority Area	NYISO proposes revision to retain in its comparable Articles 9.5.1.1 and 9.5.1.2 of its Standard Interconnection Agreement the use of the term "New York Control Area" in place of Balancing Authority Area as described in Part VII.E.ii.a of the cover letter.
9.6.2	Replaced Control Area with Balancing Authority	NYISO proposes revision to retain in its comparable Articles 9.5.2 of its Standard Interconnection Agreement the use of the term "New York Control Area" in place of Balancing Authority Area as described in Part VII.E.ii.a of the cover letter.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
9.6.2.1	Replaced Control Area with Balancing Authority Area	NYISO proposes revision to retain in its comparable Articles 9.5.2.1 of its Standard Interconnection Agreement the use of the term “New York Control Area” in place of Balancing Authority Area as described in Part VII.E.ii.a of the cover letter.
9.6.4	Replaced NERC with Electric Reliability Organization and lowercased reliability standard	Order No. 2023 edit is to language in Article 9.5.5 of the NYISO’s Standard Interconnection Agreement that is not included in the NYISO’s Commission-accepted variation from this provision.
9.6.4.1	Replaced NERC with Electric Reliability Organization and lowercased reliability standard	Order No. 2023 edit is to language in Article 9.5.5.1 of the NYISO’s Standard Interconnection Agreement that is not included in the NYISO’s Commission-accepted variation from this provision.
9.6.4.2	Lowercased reliability standard	Order No. 2023 edit is to language in Article 9.5.5.2 of the NYISO’s Standard Interconnection Agreement that is not included in the NYISO’s Commission-accepted variation from this provision.
9.6.4.4	Revised Electric Storage Resources provision to encompass a Generating Facility that contains an electric storage resource	NYISO proposes to include Order No. 2023 edit in Article 9.5.5.4 of the Standard Interconnection Agreement with limited revisions to align with the terminology in its Standard Interconnection Agreement.
9.7.3	Revised Under-Frequency and Over Frequency Conditions as Ride Through Capability and Performance with certain revised requirements	NYISO proposes to include Order No. 2023 and 2023-A edits in Article 9.6.3 of its Standard Interconnection Agreement with certain revisions described in Part XII.F.ii of the cover letter.
11.5	Revised security requirements, with reference to Appendix B and with inclusion of LGIA Deposit rules	NYISO proposes not to include the Order No. 2023 edits to the security requirements as the NYISO’s proposed approach does not include an LGIA Deposit as described in Part VII.E.ii.a of the cover letter.
13.2	Replaced reference to NERC and Applicable Reliability Council with Electric Reliability Organization	NYISO proposes not to replace “Applicable Reliability Councils” with Electric Reliability Organization in Article 13.2 of its Standard Interconnection Agreement, as the term Applicable Reliability Councils in its agreement includes not only the Electric Reliability

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
		Organization, but also the Northeastern Power Coordinating Council and New York State Reliability Council.
17.2	Inserted new provision on Violation of Operating Assumptions for Generating Facilities	NYISO proposes not to include new Article 17.2 as it proposes not to include the electric storage resource operating assumption rules as described in Part XII.D of the cover letter.
18.3.9	Revised days for providing certification of insurance form 10 days to 10 Business Days	NYISO proposes not to include Order No. 2023 edit to set number of days for developers and transmission owners to provide certificates of insurance as Commission has previously accepted independent entity variation in NYISO agreement that establishes a placeholder for developer and transmission owner to specify such timeframe.
22.1.11	Replaced Control Area with Balancing Authority Area	Order No. 2023 edit is to language in Article 22.1.11 of the NYISO's Standard Interconnection Agreement that is not included in the NYISO's Commission-accepted variation from this provision.
24.3	Revised description of applicable interconnection study	NYISO proposes revisions to this provision to reference the applicable study under the NYISO's distinct interconnection process (i.e., "Class Year Study or Cluster Study" in place of "Cluster Study and Facilities Study").
Appx A	Inserted placeholders for Substation Network Upgrades and System Network Upgrades	NYISO proposes revisions to use the applicable terms in its distinct interconnection process for such upgrades.
Appx B	Inserted requirements concerning Site Control and Withdrawal Penalties	NYISO proposes to include site control requirement in Appendix B, but as revised to remove reference to Withdrawal Penalty as NYISO's proposed process includes separate requirements concerning Security forfeiture as described in Part VII.E.iv of the cover letter.
Appx G	Revised to insert a Generating Facility that contains a wind generating plant	Order No. 2023 edit is to appendix that is not included in the NYISO's Commission-accepted interconnection agreement.
Appx H	Inserted new appendix concerning operating assumptions for electric storage resources	NYISO proposes not to include this appendix as NYISO proposes not to adopt the energy storage resource operating assumption requirements, as described in Part XII.D of the cover letter.
Commission's Pro Forma Small Generator Interconnection Procedures		

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1.4	Revised to provide modifications must be accompanied with updates to models	NYISO proposes not to include this revision into its Small Generator Interconnection Procedure tariff provisions as NYISO proposes that such provisions will not apply under its new interconnection process as described in Part X.A of the cover letter.
3.3.6	Inserted new provision to address evaluation of alternative technologies	NYISO proposes not to include this revision into its Small Generator Interconnection Procedure tariff provisions as NYISO proposes that such provisions will not apply under its new interconnection process as described in Part X.A of the cover letter.
3.4.10	Inserted new provision to address evaluation of alternative technologies	NYISO proposes not to include this revision into its Small Generator Interconnection Procedure tariff provisions as NYISO proposes that such provisions will not apply under its new interconnection process as described in Part X.A of the cover letter.
Att. 1	Inserted defined term for “Applicable Reliability Standards”	NYISO proposes to retain existing definition of Applicable Reliability Standards previously accepted by the Commission.
Att. 1	Inserted defined term for “Applicable Laws and Regulations”	NYISO proposes to insert its definition of the term Applicable Laws and Regulations previously accepted by the Commission.
Att. 2	Inserted in interconnection request form models for non-synchronous Small Generating Facilities	NYISO proposes not to include this revision into its Small Generator Interconnection Procedure tariff provisions as NYISO proposes that such provisions will not apply under its new interconnection process as described in Part X.A of the cover letter.
Commission’s Pro Forma Small Generator Interconnection Agreement		
1.5.7	Revised to insert requirements regarding abnormal frequency conditions and voltage conditions and revisions regarding reactive power priority mode	NYISO proposes to include Order No. 2023 and 2023-A edits in Article 1.5.7 of its Small Generator Interconnection Agreement with certain revisions described in Part X.A.iii of the cover letter.
1.6	Revised to replace control area with Balancing Authority Area	NYISO proposes revision to use in Article 1.6 of its Small Generator Interconnection Agreement the term “New York Control Area” in place of Balancing Authority Area as described in Part VII.E.ii.a of the cover letter.

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
1.8.1.1	Revised to replace control area with Balancing Authority Area	NYISO proposes revision to retain in Article 1.8.1.1 of its Small Generator Interconnection Agreement the term “New York Control Area” in place of Balancing Authority Area as described in Part VII.E.ii.a of the cover letter.
1.8.1.2	Revised to replace control area with Balancing Authority Area	NYISO proposes revision to use in Article 1.8.1.2 of its Small Generator Interconnection Agreement the term “New York Control Area” in place of Balancing Authority Area as described in Part VII.E.ii.a of the cover letter.
1.8.4	Revised to replace NERC with Electric Reliability Organization and to lowercase reliability standards	Order No. 2023 edit is to language in comparable Article 1.8.3 of the NYISO’s Small Generator Interconnection Agreement that is not included in the NYISO’s Commission-accepted variation from this provision.
1.8.4.1	Revised to uppercase Balancing Authority	Order No. 2023 edit is to language in comparable Article 1.8.3.1 of the NYISO’s Small Generator Interconnection Agreement that is not included in the NYISO’s Commission-accepted variation from this provision.
1.8.4.4	Revised to uppercase Balancing Authority	Order No. 2023 edit is to language in comparable Article 1.8.3.4 of the NYISO’s Small Generator Interconnection Agreement that is not included in the NYISO’s Commission-accepted variation from this provision.
Att. 1	Inserted defined term “Applicable Reliability Standards”	NYISO proposes to retain its existing definition of Applicable Reliability Standards in Attachment 1 previously accepted by the Commission.
Att. 1	Inserted defined term “Balancing Authority”	NYISO proposes to include this term in Attach. 1 of its Small Generator Interconnection Agreement.
Att. 1	Inserted defined term “Balancing Authority Area”	NYISO proposes to include this term in Attach. 1 of its Small Generator Interconnection Agreement.
Att. 1	Revised definition of “Operating Requirements”	NYISO proposes to insert Order No. 2023 edit to insert “Balancing Authority Area,” but not to delete “control area,” which is the

Commission Pro Forma Provision	Order No. 2023/ Order No. 2023-A Change	NYISO Proposed Tariff Revisions
		appropriate term in New York for certain operating requirements as described in Part X.A.iii of the cover letter.