

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

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

Docket Nos. RM21-17-000

**MOTION FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING OF
THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.
AND REQUEST FOR ACTION BY MARCH 24, 2025**

In accordance with Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure,¹ the New York Independent System Operator, Inc. (“NYISO”) respectfully requests that the Commission grant: (i) an extension to April 30, 2026 of the due date for the NYISO’s submission of its compliance filing to address the regional requirements established by Order Nos. 1920 and 1920-A (“Order No. 1920”), and (ii) an extension to June 14, 2027 of the due date for the NYISO’s submission to address the interregional requirements.²

The NYISO supports and shares the goals of Order No. 1920 concerning the implementation of long-term transmission planning. The NYISO has been working with the relevant state entities in New York and NYISO stakeholders to develop revisions to its regional transmission planning process requirements that comply with Order No. 1920 within New York’s unique transmission planning framework as a single-state region. This has included extensive coordination with the New York State Department of Public Service (“NYDPS”) to position these reforms within the broader context of New York State’s existing transmission planning efforts that the New York State Public Service Commission (“NYPSC”) has

¹ 18 C.F.R. §§ 385.212, 385.2008 (2024).

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

implemented to achieve the requirements of the state’s Climate Leadership and Community Protection Act (“CLCPA”).

As described below, the NYISO requires additional time to fully develop a comprehensive set of reforms that comply with Order No. 1920’s regional requirements while continuing to meaningfully engage with the relevant state entities, New York Transmission Owners, and other NYISO stakeholders. The requested extension will provide the NYISO with the time needed to develop a compliance approach that enhances the overall efficiency of transmission planning in New York and establishes appropriate coordination with state-level processes.

The NYISO also requires additional time to address the interregional requirements established by Order No. 1920 to align its satisfaction of these compliance obligations with the extended deadlines that the Commission has granted to its neighboring regions—PJM Interconnection, L.L.C. (“PJM”) and ISO New England Inc. (“ISO-NE”). In particular, the Commission granted ISO-NE with a deadline of June 14, 2027 to submit its regional and interregional compliance filings.³ The NYISO has commenced initial discussions with both PJM and ISO-NE concerning the updates that will be required to the existing interregional transmission planning requirements among all three entities to comply with the new rules in Order No. 1920. However, these updates cannot be fully developed until all three neighboring regions have developed their proposed regional compliance approaches with Order No. 1920.

Good cause exists for the Commission to grant to the NYISO extensions of the regional and interregional compliance filing deadlines. The extensions will enable the NYISO (1) to continue its coordination with the NYDPS to address the alignment of the new long-term

³ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000 (February 10, 2025).

transmission planning process with the state’s transmission planning efforts, (2) to provide sufficient time to develop and review the transmission planning reforms with relevant state entities, Transmission Owners, and other NYISO stakeholders, and (3) to coordinate with its neighboring regions to reflect the long-term transmission planning reforms in the interregional coordination processes. The additional coordination allowed by the requested extensions will enhance the NYISO’s opportunity, with relevant state entities, Transmission Owners, and other NYISO stakeholders, to identify reforms that promote efficiency and enable the coordination of the NYISO’s and state’s processes, which will improve long-term transmission planning in New York for the benefit of ratepayers. Finally, the requested extensions are comparable to the extensions that the Commission has granted to other independent system operators (“ISOs”) and regional transmission organizations (“RTOs”) for their compliance with Order No. 1920.

The NYISO respectfully requests that the Commission act and issue an order granting the requested extensions on or before March 24, 2025. While the NYISO has acted diligently in developing its compliance approach for Order No. 1920, substantial work and coordination are still required to fully develop its proposed approach. If the requested extensions are not granted, the NYISO will need to expedite or minimize its coordination with relevant state entities, its stakeholders, and neighboring regions, so it can focus its efforts on finalizing a compliance approach and developing the required tariff revisions in time for the currently required June 2025 and August 2025 deadlines.

I. MOTION FOR EXTENSION OF TIME

The Commission’s Rules of Practice and Procedure permit the Commission to extend “the time by which any person is required or allowed to act under any statute, rule, or order”

upon motion demonstrating good cause prior to the expiration of such time.⁴ The NYISO’s request for an extension of time is supported by good cause as described herein.

A. Background

On May 13, 2024, the Commission issued Order No. 1920 revising the *pro forma* Open Access Transmission Tariff (“OATT”)⁵ to remedy deficiencies in the Commission’s existing regional and local transmission planning and cost allocation requirements. Specifically, the Commission requires transmission providers to, among other things, conduct Long-Term Regional Transmission Planning that will ensure the identification, evaluation, and selection, as well as the allocation of the costs, of more efficient or cost-effective regional transmission solutions to address Long-Term Transmission Needs. Order No. 1920 directed transmission providers to submit their compliance in two parts with the regional requirements for a Long-Term Regional Transmission Planning process to be filed within 10 months of the effective date of the final order—*i.e.*, on or before June 12, 2025—and the interregional coordination requirements for a Long-Term Regional Transmission Planning process to be filed within 12 months of the effective date of the order—*i.e.*, on or before August 12, 2025.⁶

On November 21, 2024, the Commission issued Order No. 1920-A modifying and clarifying parts of Order No. 1920 that, among other things, reaffirmed that meaningful engagement with states is “critical to the success of the Long-Term Regional Transmission

⁴ 18 C.F.R. § 385.2008(a).

⁵ Capitalized terms that are not otherwise defined in this filing shall have the meaning specified in Attachment Y of the NYISO OATT and, if not defined therein, in Section 1 of the NYISO OATT.

⁶ Order No. 1920 at PP 1768–74. Order No. 1920 was published in the *Federal Register* on June 12, 2024, with an effective date of August 12, 2024, while Order No. 1920-A was published in the *Federal Register* on November 21, 2024.

Planning reforms.”⁷ Order No. 1920-A did not modify the regional or interregional compliance filing deadlines.⁸

B. The NYISO’s Requested Extension Will Allow for Greater Coordination with the Relevant State Entities and NYISO Stakeholders on a Long-Term Regional Transmission Planning Process

The NYISO’s requested extension of its compliance deadline for the regional requirements of Order No. 1920 to April 30, 2026 will afford the NYISO, relevant state entities, Transmission Owners, and other NYISO stakeholders with additional time to coordinate in the development of a Long-Term Regional Transmission Planning process that efficiently functions within the broader context of the NYISO’s unique transmission planning process and New York State’s existing transmission planning efforts.

Order No. 1920 requires that transmission providers work in close consultation with relevant state entities in multiple phases of the new Long-Term Regional Transmission Planning process.⁹ As a single-state ISO, the NYISO has a strong and successful track record of coordinating with New York State entities in its transmission planning processes to identify and address transmission needs in New York.¹⁰ The NYISO shares the aims of the Commission in Order No. 1920 for close coordination with relevant state entities. The NYISO has been working, and will continue to work, with New York State entities in developing a Long-Term Regional Transmission Planning process that enhances transmission planning in New York in compliance with Order No. 1920 and establishes appropriate coordination with state-level

⁷ Order No. 1920-A at P 3.

⁸ *Id.* at P 914. Order No. 1920-A provided for extending the compliance deadlines in limited cases to align with an extension of the engagement period based on the request of relevant state entity.

⁹ *See, e.g., id.* at P 242.

¹⁰ The Commission has acknowledged the NYISO’s successful collaboration with the NYPSC to identify and address Public Policy Transmission Needs. *See, e.g., New York Indep. Sys. Operator, Inc.*, 175 FERC ¶ 61,038 (2021) (Clements, concurring) at P 3 (“While this has not been the case in all regions, the success of NYISO’s competitive solicitations for public policy projects has been a bright spot in the Order No. 1000 landscape.”).

processes. The NYISO also commenced in November 2024 the engagement period for relevant state entities’ discussion of cost allocation methodologies for Long-Term Regional Transmission Facilities.¹¹ However, additional time is necessary to achieve the above-stated objectives. Specifically, the NYISO requires additional time to enable further discussion with relevant state entities, Transmission Owners, and other NYISO stakeholders concerning the development of a comprehensive proposed compliance approach and to provide them with an opportunity to meaningfully review and provide their input on the resulting approach and the related tariff language.

A key consideration in the NYISO’s development of a new long-term planning process is the interaction of the new process required by Order No. 1920 with the statewide transmission planning efforts implemented by the NYPSC to comply with New York legislation to achieve the targets in the state’s CLCPA—the Coordinated Grid Planning Process (“CGPP”).¹² In particular, the NYPSC adopted the CGPP through which the NYDPS and certain New York utilities plan for transmission and distribution facilities to achieve the state’s climate goals with inputs from a state-designated advisory committee.¹³ The state’s CGPP shares many of the objectives that the Commission set forth in Order No. 1920.¹⁴ The NYDPS and utilities are currently administering

¹¹ *New York Indep. Sys. Operator Inc.*, Notice of Opening of Engagement Period for Relevant State Entities Regarding Cost Allocation Methodology for Long-Term Regional Transmission Facilities (November 25, 2024), available at <https://www.nyiso.com/documents/20142/48303609/Notice-Order-1920-Relevant-State-Entities-Engagement-Period-final.pdf/>.

¹² Accelerated Renewable Energy Growth and Community Benefit Act, Chapter 58 (Part JJJ) of the 2020 Laws of New York § 2(2)(b).

¹³ PSC Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Order Approving a Coordinated Grid Planning Process (August 17, 2023) (“2023 CGPP Order”); *see also* PSC Case No. 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Order on Local Transmission and Distribution Planning Process and Phase 2 Project Proposals (September 9, 2021), at pp 18–21 (directing certain New York utilities to consult with DPS staff, NYSEERDA, and the NYISO to develop and file a coordinated planning process).

¹⁴ The CGPP is a long-term transmission planning framework focused on achieving the CLCPA. It is designed to be a three-year cycle that assists in identifying the electric transmission and distribution facilities needed

the first cycle of the CGPP with a targeted completion of the study work and preparation of a report by the end of 2025. The NYISO's requested extension will provide time for the NYISO, the relevant state entities, Transmission Owners, and other NYISO stakeholders to consider the actual experience gained from the current CGPP cycle. This, in turn, will better inform the areas of coordination and alignment of schedules between a long-term transmission planning process required under Order No. 1920 and the statewide planning efforts.

Finally, the NYISO's requested extension will not adversely impact any party or transmission planning in New York. To the contrary, during the additional requested time, the NYISO will continue to administer its Public Policy Transmission Planning Process, which process is largely aligned with the goals outlined in the reforms for Order No. 1920. The NYISO is currently performing the evaluation of proposed transmission solutions in its Public Policy Transmission Planning Process to address a transmission need identified by the NYPSC,¹⁵ which garnered a significant response with the submission of 28 proposed transmission solutions.¹⁶ The NYISO anticipates completing the study work and providing a recommendation to its Board

to facilitate the delivery of clean energy, including renewable resources, throughout New York State. *See generally*, 2023 CGPP Order at pp 4-7, 27-29. The process includes data collection, modeling, system studies, and solutions development that certain New York utilities conduct, culminating in a report setting forth recommended system investments to achieve the CLCPA for the NYPSC's consideration. *Id.* at pp 4-17, 25-36; *see also New York State Dep't Pub. Serv.*, CGPP Timeline, available at <https://dps.ny.gov/system/files/documents/2024/06/cgpp-timeline-additional-detail.pdf>. The NYPSC also has the ability under the CGPP to refer bulk transmission needs to the NYISO for purposes of the NYISO's Public Policy Transmission Planning Process and to leverage the NYISO's System & Resource Outlook developed in its Economic Planning Process to facilitate coordination with the NYISO's regional planning processes. *See* 2023 CGPP Order at pp 26-32.

¹⁵ *See* PSC Case No. 22-E-0633, *In the Matter of New York Independent System Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022*, Order Addressing Public Policy Requirements for Transmission Planning Purposes (June 22, 2023) (finding a transmission need to support the injection of 4,770 MW of offshore wind into New York City to achieve the mandates under the CLCPA).

¹⁶ *New York Indep. Sys. Operator, Inc.*, List of Public Policy Transmission Projects Proposed to Meet the New York City Offshore Wind Public Policy Transmission Need: Viability and Sufficiency Assessment (published October 29, 2024), available at <https://www.nyiso.com/documents/20142/40894368/New-York-City-Offshore-Wind-PPTN-Viability-and-Sufficiency-Assessment.pdf>.

of Directors on the more efficient or cost-effective solution to the transmission need by the end of the year.

C. The Deadline to Submit the Interregional Coordination Requirements Must Be Appropriately Timed with the Neighboring Regions' Compliance Filing Deadlines

Order No. 1920 requires transmission providers to revise their interregional transmission coordination processes to reflect the proposed processes that incorporate the Long-Term Regional Transmission Planning reforms.¹⁷ Order No. 1920 directed each transmission provider to submit a compliance filing that revises its interregional transmission coordination process two months following the initial filing that proposes the regional requirements under Order No. 1920. In order for transmission providers to coordinate with neighboring regions on the interregional coordination requirements, each transmission provider must have a sufficiently detailed proposed approach for the regional requirements for its Long-Term Transmission Planning process that can be shared with the neighboring regions. As a result, the deadline for the NYISO to submit its compliance proposal for the interregional coordination requirements must account for the compliance schedules of its neighboring regions.

Currently, the NYISO coordinates with PJM and ISO-NE through a joint operating agreement and a coordination agreement, respectively.¹⁸ In addition, PJM, ISO-NE, and the NYISO jointly engage in coordinated interregional transmission planning efforts through the Northeastern ISO/RTO Planning Coordination Protocol.¹⁹ In order for the NYISO to prepare a compliance filing to address these existing interregional transmission coordination processes to

¹⁷ Order No. 1920 at PP 12, 1751–58.

¹⁸ See generally, OATT §§ 35, 37.

¹⁹ See generally, Amended and Restated Northeastern ISO/RTO Planning Coordination Protocol (2015), available at https://www.iso-ne.com/static-assets/documents/committees/comm_wkgrps/othr/ipsac/rto_plan_prot/planning_protocol.pdf.

reflect the three regions' Long-Term Regional Transmission Planning reforms, the NYISO and its neighboring regions will need to have substantially developed their individual Long-Term Regional Transmission Planning compliance approaches. Given that the Commission has already granted PJM an extension of time to submit its compliance approach for the regional requirements of Order No. 1920 until December 12, 2025²⁰ and ISO-NE an extension of time until June 14, 2027 for both compliance filing requirements,²¹ the NYISO respectfully requests an extension of the deadline until June 14, 2027 for submission of its compliance filing to demonstrate that it meets the interregional transmission coordination requirements. This deadline aligns with the latest-in-time deadline that the Commission granted for the NYISO's neighboring regions.

D. The Requested Extension Is Consistent with Commission Action on Other Extension Requests from Other ISOs/RTOs to Comply with Order No. 1920

The NYISO's requested extensions are consistent with the extensions granted to other ISO/RTO regions to submit their compliance filings for Order No. 1920.²² The Commission has granted extensions of time for the Midcontinent Independent System Operator, Inc. ("MISO"), PJM, and ISO-NE. Specifically, MISO received a one-year extension until June 12, 2026,²³ and

²⁰ *Building for the Future through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000 (February 6, 2025) (extending only PJM's deadline to submit the regional requirements for a Long-Term Regional Transmission Planning process).

²¹ *See Building for the Future through Electric Regional Transmission Planning and Cost Allocation*, Joint Motion for Extension of Time Until June 14, 2027 to Accommodate Regional and Interregional Compliance Filings, Docket No. RM21-17-000 (January 15, 2025).

²² *See, e.g., Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Motion for Extension of Time to Submit Compliance Filing, Request for Expedited Action, and Request for a 10-Day Comment Period of Midcontinent Independent System Operator, Inc., Docket No. RM21-17-000 (November 5, 2024); *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Motion for Extension of Time to Submit Compliance Filing of PJM Interconnection, L.L.C. and Request for Order by February 6, 2025, Docket No. RM21-17-000 (December 20, 2024); *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Joint Motion for Extension of Time Until June 14, 2027 to Accommodate Regional and Interregional Compliance Filings, Docket No. RM21-17-000 (January 15, 2025).

²³ *Building for the Future through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000 (December 10, 2024).

PJM received its requested extension until December 12, 2025.²⁴ On February 10, 2024, the Commission granted ISO-NE's extension request until June 14, 2027 for both its regional and interregional compliance requirements.²⁵ The NYISO's requested extension is consistent with the extensions requested by other regions and, as described above, is specifically drawn to enable the NYISO to continue to coordinate with relevant state entities, Transmission Owners, and other NYISO stakeholders concerning compliance with the regional requirements of Order No. 1920. In addition, the requested extension on the interregional coordination requirements of Order No. 1920 aligns the various timelines of the NYISO's neighboring regions to allow such coordination.

II. REQUEST FOR COMMISSION ACTION BY MARCH 24, 2025

The NYISO respectfully requests that the Commission take action on the requested extensions on or before March 24, 2025. Commission action by this date will provide certainty to the NYISO, its stakeholders, and relevant state entities concerning the timeframe within which the NYISO must plan and conduct the remaining discussions on a proposed Long-Term Regional Transmission Planning process and enable it to allocate time accordingly to complete the work. If an extension is not granted, the NYISO will need to limit its outreach and coordination with relevant state entities, NYISO stakeholders, and neighboring regions, so that it can prioritize finalizing a compliance approach and developing tariff language in time for the applicable June and August 2025 deadlines. This will minimize the NYISO's opportunity to obtain meaningful

²⁴ *Building for the Future through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000 (February 6, 2025).

²⁵ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000 (February 10, 2025) (granting the extension request with the conditions for an information filing and status reports).

input and coordination with the relevant state entities, its stakeholders, and its neighboring regions.

III. CONCLUSION

For the reasons set forth above, the NYISO respectfully requests that the Commission act expeditiously to grant an extension of time for the NYISO's submission of its compliance filing for the regional requirements for a Long-Term Regional Transmission Planning to April 30, 2026. The NYISO also requests an extension of time for the submission of its compliance filing to revise its interregional coordination processes to reflect the Long-Term Regional Transmission Planning reforms until June 14, 2027.

Respectfully submitted,

/s/ Brian R. Hodgdon

Brian R. Hodgdon

/s/ Michael J. Messonnier

Michael J. Messonnier

Hunton Andrews Kurth LLP

Counsel for the NYISO

February 21, 2025

cc:	Janel Burdick	Emily Chen
	Robert Fares	Jignasa Gadani
	Jette Gebhart	Leanne Khammal
	Jaime Knepper	Kurt Longo
	David Morenoff	Douglas Roe
	Eric Vandenberg	

CERTIFICATE OF SERVICE

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

Dated at Rensselaer, NY this 21st day of February 2025.

/s/ Elizabeth Rilling

Elizabeth Rilling
New York Independent System Operator, Inc.
10 Krey Blvd.
Rensselaer, NY 12144
(518) 356-6177