



*The Commonwealth of Massachusetts*  
*Executive Office of Energy and Environmental Affairs*  
*100 Cambridge Street, Suite 900*  
*Boston, MA 02114*

Maura T. Healey  
GOVERNOR

Kimberley Driscoll  
LIEUTENANT GOVERNOR

Rebecca L. Tepper  
SECRETARY

Tel: (617) 626-1000  
Fax: (617) 626-1081  
<http://www.mass.gov/eea>

January 18, 2024

**VIA EMAIL**

Anne George  
Vice President, Chief External Affairs and Communications Officer  
ISO New England Inc. (ISO-NE)

Timothy Olesniewicz  
Chair, Participating Transmission Owners Administrative Committee

Re: Order No. 2023 Compliance and Affected System Operator (ASO) Studies

Dear Anne and Tim:

Last November, a group of clean energy developers contacted our office regarding concerns about how ISO-NE's transition to a cluster study approach as required by the Federal Energy Regulatory Commission's (FERC) Order No. 2023 (Order 2023) would impact ASO studies for non-FERC-jurisdictional distributed generation (DG) projects. As you know, Massachusetts and our region are charting a transformational path to a future power grid that is supplied primarily by clean energy resources, many of which will be DG resources across New England instead of centrally dispatched generation. We appreciate your responsiveness to the concerns that DG developers have expressed and are encouraged by your efforts to coordinate ASO studies with the new cluster study process for FERC-jurisdictional projects.

We are writing to request your assistance in providing clarity in two areas related to the Order 2023 transition and ASO studies. First, there appears to be a lack of shared understanding among developers regarding the effect of the cluster study process on ASO studies and, in particular, whether the new structure will serve to "pause" ASO studies. To our understanding, ISO-NE has proposed the following process that seeks to coordinate DG projects with cluster studies to the maximum extent possible and ensure ASO studies can continue in parallel:<sup>1</sup>

- Transmission Owners (TOs) can continue to conduct ASO studies as they are today, and as long as DG projects achieve Proposed Plan Application (PPA) approval pursuant to

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<sup>1</sup> We understand that the relevant dates are dependent on FERC's acceptance of the proposed effective date in the Order 2023 compliance filing.

Section I.3.9 of the ISO-NE tariff within 90 days from the start of the transitional cluster study (i.e., PPA approval by **October 30, 2024**),<sup>2</sup> the ASO studies can be completed and the proposed projects will be included in the base case for the transitional cluster study (beginning August 1, 2024 and concluding in 2025).

- TOs can conduct ASO studies in parallel with the transitional cluster study (i.e., between August 1, 2024 and when it is completed in 2025). ISO-NE will provide the TOs with the base case and modeling information from the transitional cluster study to continue their ASO studies.
- As long as the ASO studies are within 90 days of achieving I.3.9 approval from the start of the *next* cluster study in 2025, they will be included in the base case of that study and can be completed by the TOs.

To help correct any misunderstanding of the proposed process and allow opportunities for developers and others to understand and ask questions about the proposal, we ask ISO-NE to clarify that this description accurately reflects the current proposal or to provide any corrections or qualifications. Additionally, since this issue extends beyond NEPOOL, ISO-NE should utilize an additional forum, such as the Planning Advisory Committee, to provide this information and regular updates on the proposal leading up to the April 2024 compliance filing.

Second, we understand that developers have asked the TOs to provide clarity regarding which projects will be ready for Section I.3.9 PPA approval by October 30, 2024 and which projects will be included in ASO studies that run in parallel with the transitional cluster study. Greater certainty regarding the ASO timeline for projects heading into and immediately following the transitional cluster study process is, of course, critical to informing developer planning and decision making. Timely information on the status of projects under study will provide confidence that our region is successfully navigating the transition to an Order 2023 process.

Thank you again for your work to implement landmark reforms on generator interconnection. It is a substantial undertaking. The information discussed above should help to resolve many questions prior to a FERC filing and, in turn, facilitate our region's transition to a more expedited and efficient queue process.

Sincerely,



Jason Marshall  
Deputy Secretary  
Federal and Regional Energy Affairs  
Executive Office of Energy and Environmental Affairs

cc: NEPOOL Reliability Committee  
ISO-NE Planning Advisory Committee

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<sup>2</sup> Given the November 1, 2024 cutoff date for PPA approvals, we expect that the September and October 2024 New England Power Pool (NEPOOL) Reliability Committee (RC) meetings will be active with PPA requests. To help accommodate developers seeking to have their projects included in the transitional cluster study, the RC should consider holding an additional October meeting.