



Anne George  
Vice President, Chief External Affairs and  
Communications Officer

January 31, 2024

Jason Marshall  
Deputy Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Dear Deputy Secretary Marshall:

I am writing in response to your letter dated January 18, 2024 regarding ISO New England's compliance with the Federal Energy Regulatory Commission's Order No. 2023 and coordination with Affected System Operator (ASO) studies.

ISO New England is dedicating significant resources to develop its compliance proposal and is currently bringing it through the stakeholder process to meet the filing deadline established by the FERC. After the ISO submits its compliance filing to FERC, a transition process will begin, which will aid the conversion to the new requirements.

The following statements in your letter accurately represent the ISO's proposed plan for Order No. 2023 compliance and the implications for ASO studies (note that this remains subject to FERC approval of the ISO's compliance proposal).

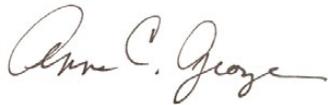
- Transmission Owners (TOs) can continue to conduct ASO studies as they are today, and as long as DG projects achieve Proposed Plan Application (PPA) approval pursuant to Section I.3.9 of the ISO-NE tariff within 90 days from the start of the transitional cluster study (i.e., PPA approval by October 30, 2024), 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.

The ISO is planning several phases of communication to provide further clarity for stakeholders on the impact of the ISO's Order No. 2023 compliance proposal on ASO studies. We believe this will be helpful for the states, TOs, and developers. First, in the coming weeks, the ISO plans to publish responses to frequently asked questions (FAQs) on this topic. The FAQs will be publicly available on the [Order No. 2023 Key Project](#) webpage and we will let you know when that information is available.

Second, on March 26 at 10:30 a.m., the ISO plans to host an educational webinar on Order No. 2023 and ASO studies following the NEPOOL Committee votes on the ISO's compliance proposal. This webinar will provide an additional opportunity for stakeholders to learn about the ISO's plans for compliance with the Order. This webinar will be free and open to any interested parties. There will be time during the webinar for attendees to submit clarifying questions regarding the proposal. The ISO intends to record the webinar and make it available online for those who are unable to attend live. We will let you know when registration for the webinar is available.

Over the past several years, the ISO has been working collaboratively with the TOs to manage the coordination and processing of significant numbers of interconnection studies for distributed energy projects. The ISO will be continuing that close coordination with the TOs to successfully manage the Order No. 2023 transition. I hope this response provides clarification to your questions and will be helpful as we continue to educate stakeholders on this process.

Sincerely,

A handwritten signature in cursive script that reads "Anne C. George".

Anne George  
Vice President, Chief External Affairs and Communications Officer