

**Comparison of ISO-NE LTTP Tariff Provisions to FERC Order 1920 Requirements**

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1	Page 242 ¶ 298	develop and use Long-Term Scenarios as part of Long-Term Regional Transmission Planning	Page 243 16.2	NESCOE will then provide the ISO written confirmation of the specific scenarios to be analyzed in the study, together with the specific information to facilitate the conduct of the study, including, but not limited to: assumptions, types and location of new resource development, location of new loads and load serving stations, and injection points or geographic zones.	LTTP is set up to take scenarios as inputs from NESCOE, while FERC Order 1920 requires the ISO to develop scenarios.
2	Page 276 ¶ 344	to develop Long-Term Scenarios as part of Long-Term Regional Transmission Planning using no less than a 20-year transmission planning horizon. We further clarify that using a transmission planning horizon of no less than 20 years means that transmission providers must develop Long-Term Scenarios to identify Long-Term Transmission Needs that will materialize in the 20 years or more following the commencement of the Long-Term Regional Transmission Planning cycle.	N/A	N/A	LTTP has no specific requirements on the length of the transmission planning horizon.
3	Page 278 ¶ 346	plan for the entire duration of the 20-year transmission planning horizon. Specifically, transmission providers must, among other requirements established in this final rule, develop and use Long-Term Scenarios to identify Long-Term Transmission Needs occurring in any period of the 20-year transmission planning horizon and to evaluate potential transmission solutions to those needs.	N/A	N/A	NESCOE selects scenarios to study, including whether the scenarios cover the full 20-year horizon and whether intermediate years are included. The needs to address with an RFP are also up to NESCOE, and may not cover the full 20-year period even if the scenarios do cover 20 years.

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4	Page 295 ¶ 377	reassess and revise the Long-Term Scenarios that they use in Long-Term Regional Transmission Planning at least once every five years.	Page 243 16.1	A request for a Longer-Term Transmission Study may be submitted to the ISO no earlier than six months from conclusion of the prior cycle, which includes Longer-Term Transmission Studies, follow-on studies, and any associated competitive solicitation.	Order 1920 requires a cycle to occur in a timeframe (at least once every five years); LTTP does not. It is possible that NESCOE could forego triggering a new LTTP cycle after five years even if they are permitted to do so. It is also possible that an LTTP cycle plus the six-month gap totals more than five years.
5	Page 296 ¶ 379	complete the steps of the Long-Term Regional Transmission Planning cycle and determine whether to select Long-Term Regional Transmission Facilities no later than three years from the date when the Long-Term Regional Transmission Planning cycle began.	N/A	N/A	LTTP has no requirement on how quickly selection decisions must be made.
6	Page 330 ¶ 432  ¶ 433	incorporate Factor Category One: federal, federally-recognized Tribal, state, and local laws and regulations affecting the resource mix and demand, in the development of Long-Term Scenarios.  We clarify that factors in Factor Category One include, among other things, legally binding obligations, incentives (e.g., tax credits), and/or restrictions promulgated by policymakers that will affect new or existing generators, or demand. Further, as discussed in the Additional Categories of Factors section below, we recognize that energy equity and justice laws and regulations are also potential factors within Factor Category One to the extent that they are likely to affect Long-Term Transmission Needs.	Page 134, Att. 1, 1.2.2 Definitions  Page 243 16.1	defining, State-identified Requirement as “a legal requirement, mandate or policy of a New England state or local government that forms the basis for a Longer-Term Transmission Study request submitted to the ISO pursuant to the process set out in Section 16 of Attachment K of the OATT”  In addition, NESCOE may submit a written request for the ISO to conduct a Longer-Term Transmission Study to identify high-level concepts of transmission infrastructure and, if requested, high-level cost estimates that could meet State-identified Requirements specified in the request based on state-identified scenarios and timeframes, which may extend beyond the five-to-ten year planning horizon.	LTTP is limited to State-identified requirements; Tariff does not mention federal, local, tribal laws/regulations. NESCOE determines the scenarios in LTTP, which means that they have the discretion regarding compliance with state laws and regulations.

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7	Page 335 ¶ 440	incorporate Factor Category Two: federal, federally-recognized Tribal, state, and local laws and regulations on decarbonization and electrification, in the development of Long-Term Scenarios.	See previous item	See previous item	LTTP is limited to State-identified requirements; Tariff does not mention federal, local, tribal laws/regulations. NESCOE determines the scenarios in LTTP, which means that they have the discretion regarding compliance with state laws and regulations.
8	Page 340 ¶ 447	incorporate Factor Category Three: state-approved integrated resource plans and expected supply obligations for load-serving entities, in the development of Long-Term Scenarios	Page 243 16.2	NESCOE will then provide the ISO written confirmation of the specific scenarios to be analyzed in the study, together with the specific information to facilitate the conduct of the study, including, but not limited to: assumptions, types and location of new resource development, location of new loads and load serving stations, and injection points or geographic zones.	In LTTP, NESCOE provides scenarios, which may or may not fully reflect state-approved resource plans.
9	Page 346 ¶ 456	incorporate Factor Category Four: trends in fuel costs and in the cost, performance, and availability of generation, electric storage resources, and building and transportation electrification technologies, in the development of Long-Term Scenarios.	Page 243 16.2	NESCOE will then provide the ISO written confirmation of the specific scenarios to be analyzed in the study, together with the specific information to facilitate the conduct of the study, including, but not limited to: assumptions, types and location of new resource development, location of new loads and load serving stations, and injection points or geographic zones.	No consideration of this category in LTTP, and NESCOE has discretion in determining scenarios to study.
10	Page 350 ¶ 463	incorporate Factor Category Five: resource retirements, in the development of Long-Term Scenarios.	Page 243 16.2	NESCOE will then provide the ISO written confirmation of the specific scenarios to be analyzed in the study, together with the specific information to facilitate the conduct of the study, including, but not limited to: assumptions, types and location of new resource development, location of new loads and load serving stations, and injection points or geographic zones.	No consideration of this category in LTTP, and NESCOE has discretion in determining scenarios to study.

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11	Page 356 ¶ 472	incorporate Factor Category Six: generator interconnection requests and withdrawals, in the development of Long-Term Scenarios.	Page 243 16.2	NESCOE will then provide the ISO written confirmation of the specific scenarios to be analyzed in the study, together with the specific information to facilitate the conduct of the study, including, but not limited to: assumptions, types and location of new resource development, location of new loads and load serving stations, and injection points or geographic zones.	No consideration of this category in LTTP, and NESCOE has discretion in determining scenarios to study.
12	Page 363 ¶ 481	incorporate Factor Category Seven: utility and corporate commitments and federal, federally-recognized Tribal, state, and local policy goals that affect Long-Term Transmission Needs, in the development of Long-Term Scenarios.	Page 243 16.2	NESCOE will then provide the ISO written confirmation of the specific scenarios to be analyzed in the study, together with the specific information to facilitate the conduct of the study, including, but not limited to: assumptions, types and location of new resource development, location of new loads and load serving stations, and injection points or geographic zones.	No consideration of this category in LTTP, and NESCOE has discretion in determining scenarios to study.
13	Page 395 ¶ 528	publish on the public portion of an OASIS or other public website: (1) the list of the factors in each of the seven required categories of factors that they will account for in their Long-Term Scenarios; (2) a description of each factor that they will account for in their Long-Term Scenarios; (3) a general statement explaining how they will account for each of those factors in their Long-Term Scenarios; (4) a description of the extent to which they will discount any factors in Factor Categories Four through Seven in each Long-Term Scenario; and (5) a list of the factors that they considered but did not incorporate in their Long-Term Scenarios.	Page 243 16.2	The ISO will then develop a scope of work that may be performed, and post on the ISO’s website the Longer-Term Transmission Study’s proposed scope of work, associated parameters, and assumptions. A meeting of the Planning Advisory Committee will be held promptly thereafter in order to solicit stakeholder input on the study’s scope, parameters, and assumptions.	Order 1920 specifies factors to be considered in Long-Term Scenarios, whereas LTTP leaves that to the states.

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14	Page 399 ¶ 533	Transmission providers must post this information after stakeholders, including states, have had the meaningful opportunity to propose potential factors and to provide input on how to account for specific factors in the development of Long-Term Scenarios.	Page 243 16.2	Members of the Planning Advisory Committee shall direct all such input related to the Longer-Term Transmission Study’s scope, parameters, and assumptions to the ISO for consideration by the ISO and NESCOE, as applicable. ... The ISO will provide the final scope of work for the Longer-Term Transmission Study to NESCOE for confirmation, and once written confirmation is received, will post the final scope of work on the ISO’s website.	Order 1920 includes factors requiring input that LTTP does not.
15	Page 415 ¶ 559	develop at least three distinct Long-Term Scenarios as part of Long-Term Regional Transmission Planning. In implementing this requirement, transmission providers must develop, at least once during the five-year Long-Term Regional Transmission Planning cycle, at least three distinct Long-Term Scenarios that, at a minimum, incorporate the seven categories of factors listed in the Categories of Factors section above.	N/A	N/A	LTTP has no requirements on the number of scenarios.
16	Page 416 ¶ 560	transmission providers in each transmission planning region to publicly disclose (subject to any applicable confidentiality protections) information and data inputs that they use to create each Long-Term Scenario.	Page 243 16.2	The ISO will then develop a scope of work that may be performed, and post on the ISO’s website the Longer-Term Transmission Study’s proposed scope of work, associated parameters, and assumptions.	

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17	Page 417 ¶ 560	with the input of their customers and other stakeholders, to craft coordination requirements that work for those transmission providers and their customers and other stakeholders. Furthermore, we adopt the NOPR proposal to require transmission providers to revise the regional transmission planning process in their OATTs to outline an open and transparent process that provides stakeholders, including states, with a meaningful opportunity to propose which future outcomes are probable and can be captured through assumptions made in the development of Long-Term Scenarios.	Page 243 16.2	Members of the Planning Advisory Committee shall direct all such input related to the Longer-Term Transmission Study’s scope, parameters, and assumptions to the ISO for consideration by the ISO and NESCOE, as applicable. ... The ISO will provide the final scope of work for the Longer-Term Transmission Study to NESCOE for confirmation, and once written confirmation is received, will post the final scope of work on the ISO’s website.	Order 1920 requires input on how Long-Term Scenarios are developed; LTTP similarly provides for the receipt of input on a study’s scope, parameters, and assumptions.
18	Page 427 ¶ 575  ¶ 576	develop a plausible and diverse set of at least three Long-Term Scenarios. Specifically, we find that the set of at least three Long-Term Scenarios must be: (1) plausible, meaning that each scenario must itself be reasonably probable, and collectively that the set of plausible scenarios must reasonably capture probable future outcomes, and (2) diverse, in the sense that transmission providers can distinguish distinct transmission facilities or distinct benefits of similar transmission facilities in each Long-Term Scenario.  Moreover, we also require that each <i>individual</i> Long-Term Scenario be plausible (i.e., individually the scenario must be reasonably probable)	N/A	N/A	LTTP has no requirements on the number of scenarios.

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19	Page 440 ¶ 593	develop at least one sensitivity, applied to each Long-Term Scenario, to account for uncertain operational outcomes that determine the benefits of and/or need for transmission facilities during multiple concurrent and sustained generation and/or transmission outages due to an extreme weather event across a wide area	N/A	N/A	No extreme weather sensitivities required in LTTP.
20	Page 466 ¶ 633	use “best available data inputs” when developing Long-Term Scenarios	N/A	N/A	NESCOE develops scenarios in LTTP.
21	Page 466 ¶ 633	best available data inputs also reflect the list of factors that transmission providers account for in their Long-Term Scenarios. By “reflect the list of factors,” we mean the data inputs that correspond to the list of factors that transmission providers have determined might affect Long-Term Transmission Needs	N/A	N/A	NESCOE develops scenarios in LTTP.
22	Page 467 ¶ 633	update, as necessary, all data inputs each time they reassess and revise their Long-Term Scenarios	N/A	N/A	NESCOE develops scenarios in LTTP.
23	Page 467 ¶ 634	Order Nos. 890 and 1000 transmission planning principles apply to the process through which transmission providers determine which data inputs to use in their Long-Term Scenarios	N/A	N/A	Numerous points in the LTTP process require transparency and provide for stakeholder input.

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24	Page 523 ¶ 719	measure a set of seven required benefits (required benefits) for Long-Term Regional Transmission Facilities under each Long-Term Scenario as part of Long-Term Regional Transmission Planning. Furthermore, we adopt the NOPR proposal, with modification, to require transmission providers in each transmission planning region to use these measured benefits to evaluate Long-Term Regional Transmission Facilities, as discussed below in the Evaluation and Selection of Regional Transmission Facilities section	Page 251 16.4(h)	The ISO will determine the financial benefits associated with Longer-Term Proposals that meet the needs identified in the request for proposal(s) and are competitive in terms of electrical performance, cost, future system expandability and feasibility	Not all seven of Order 1920’s benefits are mandated in LTTP. (see details in following items)
25	Page 529 ¶ 726	propose on compliance a date, no later than one year from the date on which initial filings to comply with this final rule are due, on which they will commence the first Long-Term Regional Transmission Planning cycle (unless additional time is needed to align the first Long-Term Regional Transmission Planning cycle with existing transmission planning cycles)	N/A	N/A	Requirement covers timing of effective date.
26	Page 543 ¶ 745	measure and use Benefit 1, Avoided or Deferred Reliability Transmission Facilities and Aging Transmission Infrastructure Replacement, in Long-Term Regional Transmission Planning	Page 251 16.4(h)	Avoided transmission investment	Order 1920 requires additional detail on how this is measured.
27	Page 549 ¶ 755	measure and use Benefit 2, in Long-Term Regional Transmission Planning. This benefit can be characterized and measured as Benefit 2(a), Reduced Loss of Load Probability, or as Benefit 2(b), Reduced Planning Reserve Margin, and we clarify that these are different methods for measuring the same underlying benefit	Page 251 16.4(h)	Avoided capital cost of local resources needed to serve demand Reduction in expected unserved energy	At a minimum, the ISO will need to explain how these two benefits used in LTTP aren’t double-counting in the Order 1920 compliance filing. Order 1920 requires additional detail on how this is measured.

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28	Page 562 ¶ 767	measure and use Benefit 3, Production Cost Savings, in Long-Term Regional Transmission Planning	Page 251 16.4(h)	Production cost and congestion savings	Order 1920 requires additional detail on how this is measured.
29	Page 570 ¶ 781	measure and use Benefit 4, Reduced Transmission Energy Losses, in Long-Term Regional Transmission Planning	Page 251 16.4(h)	Reduction in losses	Order 1920 requires additional detail on how this is measured.
30	Page 575 ¶ 788	measure and use Benefit 5, Reduced Congestion Due to Transmission Outages, in Long-Term Regional Transmission Planning	N/A	N/A	While LTTP mentions reduced congestion, there is no consideration of transmission outages.
31	Page 585 ¶ 800	measure and use Final Rule Benefit 6, mitigation of extreme weather events and unexpected system conditions, in Long-Term Regional Transmission Planning	N/A	N/A	No consideration of extreme weather events or unexpected system conditions in LTTP.
32	Page 585 ¶ 800	measure, as part of Benefit 6, the benefits of reduced loss of load (not only reduced production costs)	N/A	N/A	No consideration of extreme weather events or unexpected system conditions in LTTP.
33	Page 586 ¶ 800	account for both extreme weather events and unexpected system conditions when transmission facilities have particularly high value	N/A	N/A	No consideration of extreme weather events or unexpected system conditions in LTTP.
34	Page 586 ¶ 800	measure, as part of Benefit 6, the benefits associated with any increase in Interregional Transfer Capability provided by a Long-Term Regional Transmission Facility during an extreme weather event or unexpected system condition that results in multiple and concurrent sustained generation and/or transmission outages	N/A	N/A	No consideration of extreme weather events or unexpected system conditions in LTTP.
35	Page 600 ¶ 817	measure and use Final Rule Benefit 7, Capacity Cost Benefits from Reduced Peak Energy Losses, in Long-Term Regional Transmission Planning	N/A	N/A	No consideration of this factor in LTTP.

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36	Page 614 ¶ 837	include in their OATTs a general description of how they will measure each of the seven benefits included in the required set of benefits that we require them to measure and use in Long-Term Regional Transmission Planning	N/A	N/A	Order 1920 compliance requires additional details on how the financial benefits measured will be measured than what the LTTP rules provide.
37	Page 626 ¶ 859	calculate the benefits of Long-Term Regional Transmission Facilities over a time horizon that covers, at a minimum, 20 years starting from the estimated in-service date of the transmission facilities, and we require that this minimum 20-year benefit horizon be used both for the evaluation and selection of Long-Term Regional Transmission Facilities	Page 251 16.4(h)	For the purpose of this calculation, financial benefits will be set equal to the present value of all financially quantifiable benefits provided by the project projected for the first 20 years of the project's life and project costs will be set equal to the present value of the annual revenue requirements projected for the first 20 years of the project's life.	
38	Page 627 ¶ 859	to the extent that transmission providers estimate the costs of Long-Term Regional Transmission Facilities beyond the in-service date of the transmission facilities, they must estimate those future costs over the same time horizon as the estimated benefits	Page 251 16.4(h)	For the purpose of this calculation, financial benefits will be set equal to the present value of all financially quantifiable benefits provided by the project projected for the first 20 years of the project's life and project costs will be set equal to the present value of the annual revenue requirements projected for the first 20 years of the project's life.	
39	Page 658 ¶ 911	include in their OATTs an evaluation process, including selection criteria, that they will use to identify and evaluate Long-Term Regional Transmission Facilities for potential selection to address Long-Term Transmission Needs	Page 251 16.4(h)	To be eligible for consideration as the preliminary preferred Longer-Term Transmission Solution, the Longer-Term Proposal must provide a benefit-to-cost ratio of greater than 1.0.	BCR > 1.0 is the selection criteria in LTTP; Order 1920 does require a specific BCR.

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40	Page 683 ¶ 954	propose evaluation processes, including selection criteria, that are transparent and not unduly discriminatory. Consistent with Order No. 1000, we adopt the NOPR proposal to establish a requirement that transmission providers’ evaluation of transmission facilities must culminate in a determination that is sufficiently detailed for stakeholders to understand why a particular Long-Term Regional Transmission Facility (or portfolio of such Facilities) was selected or not selected	Page 252 16.4(h)	The ISO will report the preliminary preferred Longer-Term Transmission Solution to the Planning Advisory Committee and seek input on the preliminary preferred Longer-Term Transmission Solution. Members of the Planning Advisory Committee may provide comments to the ISO on the preliminary preferred Longer-Term Transmission Solution.	
41	Page 683 ¶ 954	the determination of why a particular Long-Term Regional Transmission Facility (or portfolio of such Facilities) was selected or not selected must include the measured benefits for each alternative Long-Term Regional Transmission Facility (or portfolio of such Facilities) considered in the Long-Term Regional Transmission Planning process	Page 252 16.4(i)	Following receipt of stakeholder input, the ISO will identify the preferred Longer-Term Transmission Solution, together with an overview of why the solution is preferred, in a report and post that report on the ISO’s website.	Order 1920 requires calculation of all benefits.
42	Page 682 ¶ 955	propose on compliance evaluation processes, including selection criteria, that aim to ensure that more efficient or cost-effective Long-Term Regional Transmission Facilities are selected to address Long-Term Transmission Needs	Page 250 16.4(h)	The ISO will identify the Longer-Term Transmission Solution that offers the best combination of electrical performance, cost, future system expandability and feasibility to comprehensively address all of the needs in the timeframes specified in the request for proposal(s) as the preliminary preferred Longer-Term Transmission Solution in response to each request for proposal.	

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43	Page 684 ¶ 955	identify one or more Long-Term Regional Transmission Facilities (or portfolio of such Facilities) that address the Long-Term Transmission Needs that the transmission providers have identified through Long-Term Regional Transmission Planning	Page 246 16.4(b)	The ISO will publicly post on its website a request for proposal(s) inviting Qualified Transmission Project Sponsors to submit (by the deadline specified in the request for proposal, which shall not be less than 60 days from the date of posting the request for proposal) a Longer-Term Proposal offering a comprehensive solution that addresses all the needs identified in the request. The request for proposal will indicate that a Qualified Transmission Project Sponsor may submit an individual or joint Longer-Term Proposal(s). In the case where a joint proposal is submitted, all parties must be Qualified Transmission Project Sponsors.	
44	Page 684 ¶ 955	nonincumbent transmission developers must be able to propose transmission facilities in Long-Term Regional Transmission Planning. Thus, we clarify that transmission providers in each transmission planning region must make clear in their OATTs the point in the Long-Term Regional Transmission Planning evaluation process at which they will accept Long-Term Regional Transmission Facility proposals from stakeholders, including nonincumbent transmission developers	Page 247 16.4(b)	The request for proposal will indicate that a Qualified Transmission Project Sponsor may submit an individual or joint Longer-Term Proposal(s). In the case where a joint proposal is submitted, all parties must be Qualified Transmission Project Sponsors.  (definition of Qualified Transmission Project Sponsor in section 4B has no requirement for QTPSs to be incumbents)	

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45	Page 685 ¶ 955	transmission providers' evaluation processes must estimate the costs and measure the benefits of the Long-Term Regional Transmission Facilities (or portfolio of such Facilities) that are identified or proposed for potential selection, in addition to evaluating the identified Long-Term Regional Transmission Facilities (or portfolio of such Facilities) using any qualitative or other quantitative selection criteria that the transmission providers in a transmission planning region propose to apply	Page 250 16.4(h)	Section 16.4(h) describes evaluation criteria.	
46	Page 685 ¶ 955	designate a point in the evaluation process at which transmission providers will determine whether to select or not select identified Long-Term Regional Transmission Facilities (or portfolio of such Facilities). This point must be no later than three years following the beginning of the Long-Term Regional Transmission Planning cycle	Page 252 16.4(i)	The ISO will select the project that meets the conditions specified in Section 16.4(h) of this Attachment K.	The LTTP does not include a timing requirement.
47	Page 688 ¶ 958	transmission providers may not impose as a selection criterion a minimum benefit-cost ratio that is higher than 1.25-to-1.00	Page 251 16.4(h)	To be eligible for consideration as the preliminary preferred Longer-Term Transmission Solution, the Longer-Term Proposal must provide a benefit-to-cost ratio of greater than 1.0.	1.0 BCR is less than 1.25 maximum.
48	Page 692 ¶ 964	transmission providers' evaluation processes and selection criteria seek to maximize benefits <i>accounting for costs</i>	Page 251 16.4(h)	To be eligible for consideration as the preliminary preferred Longer-Term Transmission Solution, the Longer-Term Proposal must provide a benefit-to-cost ratio of greater than 1.0.	BCR accounts for costs.
49	Page 696 ¶ 968	transmission providers may not adopt an approach under which they would not select a Long-Term Regional Transmission Facility unless it meets their selection criteria in every Long-Term Scenario and sensitivity	N/A	N/A	LTTP does not specify multiple scenarios.

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50	Page 710 ¶ 994	consult with and seek support from Relevant State Entities regarding the evaluation process, including selection criteria, that transmission providers propose to use to identify and evaluate Long-Term Regional Transmission Facilities for selection	N/A	N/A	Evaluation process proposed for compliance filing will be subject to states and stakeholder review.
51	Page 711 ¶ 994	demonstrate on compliance that they made good faith efforts to consult with and seek support from Relevant State Entities	N/A	N/A	Evaluation process proposed for compliance filing will be subject to states and stakeholder review.
52	Page 722 ¶ 1012	include in their OATTs a process to provide Relevant State Entities and interconnection customers with the opportunity to voluntarily fund the cost of, or a portion of the cost of, a Long-Term Regional Transmission Facility that otherwise would not meet the transmission providers' selection criteria	Page 253 16.4(j)	Notwithstanding any other provision of this Attachment K, the ISO will not cancel the request for proposal in accordance with Section 16.6 of this Attachment K if, by the 15th day from the posting of the ISO's responses on the website, the ISO receives a written communication from NESCOE: (a) accepting the ISO recommended Longer-Term Proposal, identifying the New England states, individually or jointly, that have agreed to voluntarily fund the costs of that Longer-Term Proposal in excess of those eligible for treatment as Regional Benefit Upgrades pursuant to Schedule 12 of the OATT, and identifying the manner in which those excess costs shall be allocated among the states identified in the communication, or (b) identifying up to three Longer-Term Proposals for which NESCOE seeks further analysis.	Supplemental process offers this opportunity.

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53	Page 742 ¶ 1048	include in their OATTs provisions that require them—in certain circumstances—to reevaluate Long-Term Regional Transmission Facilities that previously were selected	Page 192 3.6(c) iii	the ISO ... may remove from the RSP Project List regulated transmission solutions or Transmission Upgrades previously identified in the RSP Project List if the ISO determines that the need for the proposed regulated transmission solution or the approved Transmission Upgrade no longer exists or is no longer feasible	LTTP process does not contain specific criteria on this.
54	Page 743 ¶ 1050	include specific criteria in their OATTs that they will use to determine when one of these three situations occurs, thereby triggering the reevaluation of a previously selected Long-Term Regional Transmission Facility	N/A	N/A	LTTP process does not contain specific criteria on this.
55	Page 744 ¶ 1050	designate a point after which all selected Long-Term Regional Transmission Facilities will no longer be subject to reevaluation, such that the transmission developer of the selected Long-Term Regional Transmission Facility has adequate certainty to make investment decisions, e.g., when the facility’s transmission developer has secured all relevant permits and authorizations for the Long-Term Regional Transmission Facility	N/A	N/A	LTTP currently allows cancellation up to the in-service date without a point after which facilities are not subject to re-evaluation.

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56	Page 744 ¶ 1052	include in the reevaluation provisions in their OATTs the process and procedures that they will use to reevaluate a previously selected Long-Term Regional Transmission Facility, including the potential outcomes of reevaluation (e.g., taking no action, imposing a mitigation plan, reassigning the Long-Term Regional Transmission Facility to a different transmission developer, modifying the Long-Term Regional Transmission Facility, removing the Long-Term Regional Transmission Facility from the regional transmission plan). In particular, transmission providers must describe the conditions under which they would remove a previously selected Long-Term Regional Transmission Facility from the regional transmission plan	N/A	N/A	No specific process for re-evaluating longer-term upgrades in LTTP.
57	Page 758 ¶ 1071	explain on compliance how the initial timing sequence for Long-Term Regional Transmission Planning interacts with existing regional transmission planning processes	N/A	N/A	No Tariff needs, but will need to explain this in compliance filing.
58	Page 758 ¶ 1071	address the possible interaction between the transmission planning cycle for Long-Term Regional Transmission Planning and existing Order No. 1000 regional transmission planning processes	N/A	N/A	No Tariff needs, but will need to explain this in compliance filing.
59	Page 759 ¶ 1071	address the possible displacement of regional transmission facilities from the existing regional transmission planning processes	N/A	N/A	No Tariff needs, but will need to explain this in compliance filing.
60	Page 760 ¶ 1072	propose on compliance a date, no later than one year from the date on which initial filings to comply with this final rule are due, on which they will commence the first Long-Term Regional Transmission Planning cycle	N/A	N/A	Requirement covers timing of effective date.

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61	Page 782 ¶ 1106	revise the regional transmission planning processes in their OATTs, consistent with the requirements in this final rule, to evaluate for selection regional transmission facilities that address certain identified interconnection-related transmission needs associated with certain interconnection-related network upgrades originally identified through the generator interconnection process, as more fully described below	N/A	N/A	Interconnection-related upgrades were not a part of LTTP.
62	Page 783 ¶ 1107	evaluate for selection regional transmission facilities to address certain identified interconnection-related transmission needs in their existing Order No. 1000 regional transmission planning and cost allocation processes, rather than in Long-Term Regional Transmission Planning	N/A	N/A	Interconnection-related upgrades were not a part of LTTP.
63	Page 808 ¶ 1145	evaluate for selection in their existing Order No 1000 regional transmission planning processes regional transmission facilities to address interconnection-related transmission needs that have been identified in the generator interconnection process as requiring interconnection-related network upgrades . . .	N/A	N/A	Interconnection-related upgrades were not a part of LTTP.
64	Page 848 ¶ 1198	consider, in Long-Term Regional Transmission Planning and existing Order No. 1000 regional transmission planning processes, dynamic line ratings and advanced power flow control devices for each identified transmission need... transmission providers must consider: (1) dynamic line ratings; (2) advanced power flow control devices; (3) advanced conductors; and (4) transmission switching	Page 247 16.4(d)(i)	detailed description of the proposed solution, in the manner specified by the ISO, including an identification of the proposed route for the solution and technical details of the project, such as interconnection into the existing transmission system;	In Order 1920 compliance, need to specify that advanced transmission technologies may be provided in response to the RFP.

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65	Page 855 ¶ 1205	identify with sufficient detail in their OATTs the point or points in a given process at which the transmission providers in the transmission planning region will consider the potential use of alternative transmission technologies, including the point at which qualified transmission developers must submit any proposal to incorporate alternative transmission technologies	N/A	N/A	In Order 1920 compliance, need to provide detail on the process for considering advanced transmission technologies.
66	Page 908 ¶ 1291	file one or more <i>ex ante</i> cost allocation methods that apply to selected Long-Term Regional Transmission Facilities	Page 165 Sch. 12, 10(a)	The cost of Longer-Term Transmission Upgrades shall be allocated in the same manner as Regional Benefit Upgrades	

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67	Page 909 ¶ 1291	we also permit transmission providers to revise their OATTs to include a State Agreement Process, if Relevant State Entities indicate that they have agreed to such a process	Page 165 Sch. 12, 10(a)  Page 165 Sch. 12, 10(b)	unless the applicable PTOs in accordance with the TOA or a Qualified Transmission Project Sponsor that is not a PTO in accordance with the NTDOA files with the Commission an alternative cost allocation for a Longer-Term Transmission Upgrade that implements the cost allocation requested by NESCOE in a written communication to the ISO pursuant to Section 16.4(i) of Attachment K to this OATT and the Commission approves such alternative cost allocation  Longer-Term Transmission Upgrades that do not meet the greater than 1.0 benefit-to-cost ratio threshold: A portion of the cost of the Longer-Term Transmission Upgrades determined by multiplying the benefit-to-cost ratio, as calculated pursuant to Section 16.4(h) of Attachment K to this OATT, by the total cost of the Longer-Term Transmission Upgrades shall be allocated in the same manner as Regional Benefit Upgrades. The remaining portion of the cost of the Longer-Term Transmission Upgrades shall be allocated to Regional Network Load in each of the New England states that voluntarily agree to fund the remaining portion of the cost .  ...	

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68	Page 920 ¶ 1302	to the extent transmission providers believe that their existing cost allocation methods comply with the requirements adopted in this final rule, they may demonstrate in their compliance filings that such methods, as applied to Long-Term Regional Transmission Facilities, would comply with the requirements of this final rule	N/A	N/A	No Tariff needs, but will need to explain in compliance filing.
69	Page 922 ¶ 1304	all costs associated with a selected Long-Term Regional Transmission Facility must be allocated using the applicable Long-Term Regional Transmission Cost Allocation Method or Methods, or an applicable Commission-accepted cost allocation method that results from a State Agreement Process	Page 165 Sch. 12, 10(a)  Page 165 Sch. 12, 10(b)	The cost of Longer-Term Transmission Upgrades shall be allocated in the same manner as Regional Benefit Upgrades  Longer-Term Transmission Upgrades that do not meet the greater than 1.0 benefit-to-cost ratio threshold: A portion of the cost of the Longer-Term Transmission Upgrades determined by multiplying the benefit-to-cost ratio, as calculated pursuant to Section 16.4(h) of Attachment K to this OATT, by the total cost of the Longer-Term Transmission Upgrades shall be allocated in the same manner as Regional Benefit Upgrades. The remaining portion of the cost of the Longer-Term Transmission Upgrades shall be allocated to Regional Network Load in each of the New England states that voluntarily agree to fund the remaining portion of the cost .  ...	

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70	Page 949 ¶ 1354	establish a six-month time period (Engagement Period), during which transmission providers must: (1) provide notice of the starting and end dates for the six-month time period; (2) post contact information that Relevant State Entities may use to communicate with transmission providers about any agreement among Relevant State Entities on a Long-Term Regional Transmission Cost Allocation Method(s) and/or a State Agreement Process, as well as a deadline for communicating such agreement; and (3) provide a forum for negotiation of a Long-Term Regional Transmission Cost Allocation Method(s) and/or a State Agreement Process that enables meaningful participation by Relevant State Entities	N/A	N/A	The Order 1920 Engagement Period has begun on September 9, 2024; ISO-NE will need to explain how the requirement was met in the compliance filing. In the LTTP process, while there was no formal engagement period, the LTTP cost allocation rules are the product of states’ engagement.
71	Page 981 ¶ 1403	require transmission providers that choose to file any State Agreement Process agreed to by Relevant State Entities to describe the State Agreement Process in proposed tariff provisions in their OATTs	Page 164 Sch. 12, 10(a)  Page 164 Sch. 12, 10(b)	unless the applicable PTOs in accordance with the TOA or a Qualified Transmission Project Sponsor that is not a PTO in accordance with the NTDOA files with the Commission an alternative cost allocation for a Longer-Term Transmission Upgrade that implements the cost allocation requested by NESCOE in a written communication to the ISO pursuant to Section 16.4(i) of Attachment K to this OATT and the Commission approves such alternative cost allocation  Longer-Term Transmission Upgrades that do not meet the greater than 1.0 benefit-to-cost ratio threshold:	

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72	Page 983 ¶ 1406	any State Agreement Process must be completed, i.e., any resulting cost allocation method must be filed with the Commission, no later than six months after selection of the applicable Long-Term Regional Transmission Facility (or portfolio of such Facilities)	Page 252 16.4(i)	Within 30 days of the ISO's posting of the report identifying the preferred Longer-Term Transmission Solution, NESCOE may submit to the ISO a written communication: (a) requesting that the ISO terminate the process, or (b) requesting that the ISO continue the process, but specifying an alternative allocation for the recovery of the incremental costs to address longer-term needs beyond those necessary to address any reliability or economic needs included in the longer-term request for proposal(s)	LTTP provides for a 30 day period; Order 1920 provides for six months.
73	Page 993 ¶ 1419	all cost allocation methods, including those resulting from a State Agreement Process, must allocate costs in a manner that is at least roughly commensurate with estimated benefits	Page 165 Sch. 12, 10(a)  Page 165 Sch. 12, 10(b)	The cost of Longer-Term Transmission Upgrades shall be allocated in the same manner as Regional Benefit Upgrades  Longer-Term Transmission Upgrades that do not meet the greater than 1.0 benefit-to-cost ratio threshold: A portion of the cost of the Longer-Term Transmission Upgrades determined by multiplying the benefit-to-cost ratio, as calculated pursuant to Section 16.4(h) of Attachment K to this OATT, by the total cost of the Longer-Term Transmission Upgrades shall be allocated in the same manner as Regional Benefit Upgrades. The remaining portion of the cost of the Longer-Term Transmission Upgrades shall be allocated to Regional Network Load in each of the New England states that voluntarily agree to fund the remaining portion of the cost .  ..	

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74	Page 1022 ¶ 1469	demonstrate on compliance with this final rule that any Long-Term Regional Transmission Cost Allocation Methods, that they propose that Relevant State Entities have not indicated that they agree to, comply with Order No. 1000 regional cost allocation principles (1) through (5).	N/A	N/A	LTTP reflects state agreed-to cost allocation methods; showing required if filing a transmission provider-developed cost allocation method, as opposed to state agreed to cost allocation method.
75	Page 1135 ¶ 1625	revise the regional transmission planning process in their OATTs to enhance the transparency of: (1) the criteria, models, and assumptions that they use in their local transmission planning process; (2) the local transmission needs that they identify through the local transmission planning process; and (3) the potential local or regional transmission facilities that they will evaluate to address those local transmission needs	N/A	N/A	LTTP did not cover local transmission planning transparency, which is under the PTOs' responsibilities.
76	Page 1137 ¶ 1627	prior to the submission of local transmission planning information to the transmission planning region for inclusion in the regional transmission planning process, transmission providers in each transmission planning region must convene, collectively, as part of the regional transmission planning process, [an Assumptions Meeting, a Needs Meeting, and a Solutions meeting].	N/A	N/A	LTTP did not cover local transmission planning transparency.
77	Page 1138 ¶ 1628	publicly post the meeting materials no fewer than five calendar days prior to each of the three publicly-noticed stakeholder meetings to allow time for stakeholders to review materials in advance of each meeting	N/A	N/A	LTTP did not cover local transmission planning transparency.

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78	Page 1138 ¶ 1628	allow for a period of no fewer than 25 calendar days following the Solutions Meeting to review and consider stakeholder feedback on the local transmission solutions identified to meet the local transmission needs before the local transmission plan can be incorporated in the transmission planning region’s planning models	N/A	N/A	LTTP did not cover local transmission planning transparency.
79	Page 1138 ¶ 1628	transmission providers must respond to questions or comments from stakeholders such that it allows stakeholders to meaningfully participate in these three required stakeholder meetings	N/A	N/A	LTTP did not cover local transmission planning transparency.
80	Page 1170 ¶ 1677	evaluate whether transmission facilities (1) operating above a specified kV threshold and (2) that an individual transmission provider that owns the transmission facility anticipates replacing in-kind with a new transmission facility during the next 10 years can be “right-sized” to more efficiently or cost-effectively address a Long-Term Transmission Need	N/A	N/A	LTTP did not cover right-sizing based on asset conditions.

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81	Page 1170 ¶ 1677	sufficiently early in each Long-Term Regional Transmission Planning cycle, each transmission provider submit its in-kind replacement estimates (i.e., estimates of the transmission facilities operating at and above the specified kV threshold that an individual transmission provider that owns the transmission facility anticipates replacing in-kind with a new transmission facility during the next 10 years) for use in Long-Term Regional Transmission Planning. With respect to the specified kV threshold, transmission providers must propose on compliance a threshold that does not exceed 200 kV (e.g., 115 kV and above).	N/A	N/A	Gap: LTTP did not cover right-sizing based on asset conditions.
82	Page 1197 ¶ 1716	if a right-sized replacement transmission facility is selected, only the incremental costs of right-sizing the transmission facility will be eligible to use the applicable Long-Term Regional Transmission Cost Allocation Method, while the costs that the transmission provider would otherwise have incurred to construct the in-kind replacement transmission facility must be allocated in a manner consistent with the allocation that would have otherwise occurred for the in-kind replacement transmission facility	N/A	N/A	LTTP did not cover right-sizing based on asset condition.

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83	Page 1200 ¶ 1719	to the extent that transmission providers propose to allocate the costs of right-sized replacement transmission facilities pursuant to the cost allocation method described in the NOPR, we require the transmission providers to explain on compliance (1) the method that they will use to determine the portion of the costs of a right-sized replacement transmission facility that is incremental to the costs that would have been incurred for the underlying in-kind replacement transmission facility, and (2) the method by which they will track the portion of costs over time that are allocated in accordance with the Long-Term Regional Transmission Cost Allocation Method (or, if adopted, subject to a State Agreement Process), as well as the portion of costs that would have been allocated pursuant to the cost allocation method that otherwise would have applied to the in-kind replacement transmission facility	N/A	N/A	LTTP did not cover right-sizing based on asset condition.

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84	Page 1219 ¶ 1751	require transmission providers in neighboring transmission planning regions to revise their existing interregional transmission coordination procedures (and regional transmission planning processes, as needed) to provide for: (1) the sharing of information regarding their respective Long-Term Transmission Needs, as well as Long-Term Regional Transmission Facilities to meet those needs; and (2) the identification and joint evaluation of interregional transmission facilities that may be more efficient or cost-effective transmission facilities to address Long-Term Transmission Needs	N/A	N/A	LTTP did not cover interregional coordination.
85	Page 1219 ¶ 1752	require transmission providers in neighboring transmission planning regions to revise their interregional transmission coordination procedures (and regional transmission planning processes, as needed) to allow an entity to propose an interregional transmission facility in the regional transmission planning process as a potential solution to Long-Term Transmission Needs	N/A	N/A	LTTP did not cover inter-regional coordination.

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86	Page 1220 ¶ 1753	provide . . . additional information concerning Long-Term Regional Transmission Planning on their public website or through the email list used for communication of information related to interregional transmission coordination procedures [which] will enhance transparency and facilitate stakeholder engagement in the interregional transmission coordination procedures as applied to Long-Term Regional Transmission Planning, thereby ensuring just and reasonable rates.	N/A	N/A	LTTP did not cover inter-regional coordination.
87	Page 1228 ¶ 1768	submit a compliance filing within ten months of the effective date of this final rule revising its OATT and other document(s) subject to the Commission’s jurisdiction as necessary to demonstrate that it meets all of the requirements adopted in this final rule, except those adopted in the Interregional Transmission Coordination section of this final rule	N/A	N/A	Requirement covers timing of compliance filing.
88	Page 1229 ¶ 1768	propose on compliance a date, no later than one year from the date on which initial filings to comply with this final rule are due, on which they will commence the first Long-Term Regional Transmission Planning cycle (unless additional time is needed to align the first Long-Term Regional Transmission Planning cycle with existing transmission planning cycles )	N/A	N/A	Requirement covers timing of effective date.

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