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Connecticut Distributed Generated Interconnection Working Group Meeting Summary

**State of Connecticut Public Utilities Regulatory Authority Office of
Education, Outreach & Enforcement**

September 8, 2026 Working Group Meeting

NOTE: On Monday, September 21st, GPI sent IX WG members a draft version of the September 8th IX WG meeting summary for review. IX WG members who attended the September 8th IX WG meeting were permitted to suggest revisions to the summary for GPI and EOE consideration. Suggested revisions must pertain to whether the summary accurately reflects meeting facts. The summary review period is not an opportunity for participants to add new items or details to the points discussed during the meeting. Suggested revisions were due no later than Monday, September 28th. GPI reviewed all suggested revisions to determine whether incorporating them into the revised meeting summary would be appropriate.

Substantive suggested revisions found to be appropriate for incorporation are reflected in this final version in red for clarity and transparency purposes. Minor revisions such as grammar and punctuation corrections are not indicated in red text but have been incorporated to improve clarity.

Overview

Earlier this year, IX WG members and the EDCs reviewed and discussed transmission-level and ASO (affected system operator) studies as well as communications between the EDCs and the ISO. At this meeting, Kelly Schlichting and Brad Marszalkowski from ISO New England (ISO-NE) joined the working group to discuss transmission-level studies and timelines. Working group members had the opportunity to ask questions and engage in discussion following a presentation.

Presentation

Brad Marszalkowski (ISO-NE) provided an overview of the ISO review process, the interaction between state jurisdictional projects and federal FERC jurisdictional projects, and study timelines.

- At least 60 days prior to a project's planned in-service date, the Transmission Owner (TO) submits notice to ISO-NE. (Note: In CT, the TOs are the EDCs.)
- The ISO will provide a response based on the level of analysis needed for the project:

- Level 0 – no analysis is needed. The ISO recommends the project to the Reliability Committee (RC) for approval.
 - Level III – the interconnected TO must complete a full transmission system impact study before the RC can approve the project.
- The role of the ISO is to ensure the studies meet the planning procedure requirements and to ensure proper coordination with FERC jurisdictional studies.
- State jurisdictional projects taking place in relevant parts of the system must respect FERC jurisdictional projects and must include FERC jurisdictional studies and models.
 - The determination of relevance is based on the likelihood of state jurisdictional projects causing violations or impacting the performance of FERC jurisdictional processes.
- After the completion of the Transition Cluster Study, ASO studies will be coordinated with current ISO clusters.
- There will be a 270-calendar day revolving window for making determinations dependent on whether there is a FERC Cluster Restudy.
 - At the start of the Cluster Request Window, there will be a 20-day submission window during which TOs will submit all state jurisdictional projects they are requesting determinations for.
 - Following the submission window, there will be a 30-day determination timeframe. Level 0 projects will move on for RC approval, and Level III projects will move on to ASO scoping.
- If projects are submitted outside of submission windows, things are a bit more complicated.
 - The ISO will make Level 0 and Level III determinations outside the project submission window.
 - If the project is Level 0, it can submit a notification form.
 - If the project is Level III, and:
 - Less than 20 MW in aggregate, the projects will be moved to the next project window for review.
 - Greater than or equal to 20 MW in aggregate, a new ASO study can begin.
- If there is a FERC Cluster Restudy, projects from the ongoing ASO that are relevant will need to undergo further analysis. New projects determined to need a Level III analysis that are relevant to the FERC Cluster Restudy may be included in the current ASO study or start their own ASO study.

- Prior to FERC Order 2023, anything above 20 MW was determined to be Level III.
Now:
 - If the aggregation at the station under review plus the electrically close station is < 20 MW, and the newly proposed addition of individually <5 MW DERs at that station plus those at electrically close stations is < 20 MW, Level 0
 - If the aggregation at the station under review plus the electrically close stations is 20 MW or greater, and the newly proposed addition of individually <5 MW DERs at that station plus those at electrically close stations is < 20 MW, Level 0
 - If the aggregation at the SUR plus the ECSs is < 20 MW, and the newly proposed addition of individually <5 MW DERs is > 20 MW, then the projects will require Level III analysis
- Stakeholder feedback
 - ISO proposed these changes at the June 2024 RC.
 - ISO had meetings with affected entities and received significant feedback
 - At the August 2024 RC, New England stakeholders voted to approve these changes.

Discussion

Working group members asked questions following Brad's presentation.

- James Schwartz (Independence Solar): Asks when the approximate start of the next upcoming 20-day determination window will be.
 - Brad: October 5.
- Luke Hanson (Scale Microgrids): Asks what it means to be electrically close to a station.
 - Brad: Electrical proximity. So it can be at a single substation, or an electrically close substation. Planning procedure 5-6 has the details on how we determine that in Appendix I. It's a voltage sag analysis.
- Luke Hanson: Asks if the I-39 letter is the only deliverable from ISO-NE to the developer and how the letters are distributed.
 - Brad: Yes. ISO-NE's portion of this is the I-39 approval. Once the RC approves the project, the applicant usually gets their approval letter within 1-2 weeks. All letters are posted to the website.
- Nachum Sadan (GridEdge): Notes that it would be helpful to have a decision tree or flowchart to visualize the various decision points throughout the process.
- Val Stori (GPI): Asks who determines whether and when to submit an application.

- Brad: Generally it is the developers who are coordinating this with the TOs. Normally it is the TOs deciding when to send it in.
- Val Stori: What is communication like between the ISO and the TO?
 - Brad: We have regular coordination meetings with the TOs. The TOs are very aware of timelines and communication is robust.
- James Schwartz: Is there a way to check if a project application has been submitted?
 - Brad: This doesn't get posted on the ISO website, and ISO-NE generally does not interact directly with developers. You should contact the TO about this.
- Val Stori: How can developers engage with the ISO?
 - Brad: The RC is the path where these changes got approved. It consists of representatives for generation, markets, transmission, load, etc. If there is a developer that is looking to participate in that, you already have access if you are a market participant. If you are not a market participant, you would have to go through your TO or generation representative.
 - A generation representative group are groups that disseminate information to generation owners and represent their interests at those meetings.
 - The [Planning Advisory Committee](#) (PAC) is also open to join.
- Everything discussed by ISO-NE in the presentation is in planning procedure 5-6: https://www.iso-ne.com/static-assets/documents/rules_proceeds/isone_plan/pp05_6/pp5_6.pdf
- Participation links:
 - <https://www.iso-ne.com/participate>
 - <https://www.iso-ne.com/participate/training>

Topics for IX WG Discussion

At previous meetings and over email, working group participants brainstormed a list of suggested topics for future meetings. The group reviewed the list and identified the following topics to prioritize:

- Compliance tracking
- Timeline and cost estimates for infrastructure upgrades
 - The timelines for infrastructure modifications are all over the place/wide ranging and lack visibility for developers.
- The working group had a “chess clock” subgroup meeting and identified next steps for the chess clock. We can keep the issue on our list but can consider that it's

moving ahead separately for now. We can have additional subgroup discussion on the chess clock if we determine that will be helpful.

Next Steps:

- The next working group meeting will take place on October 13, 2026.
- GPI will review the proposed topics with the EDCs and developers to prioritize them for the October meeting and will be in touch with both groups to prepare presentations and discussion materials.