

January 26, 2024

Request for Good Cause Exemption  
Pursuant to 35-A M.R.S. Section 3209-A

PETITION FOR LATE FILED  
INTERVENTION AND REPLY  
STATEMENT OF CENTRAL  
MAINE POWER COMPANY

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**I. CMP Factual Participation or Late Filed Petition to Intervene**

Throughout this proceeding Central Maine Power Company (“CMP”) has participated in a purely factual manner, refraining from providing legal argument or positioning on the outcome of the proceeding. Given the tenor and substance of Initial Briefs filed pursuant to the December 28, 2023 Procedural Order Directing Submission of Briefs, CMP takes the opportunity, as it has throughout the case, to provide factual background on the study process in question. Given the advanced procedural posture of the proceeding, CMP abstains from providing a direct response to points raised but notes that CMP worked to advance the transmission level studies in question reasonably, prudently, and tirelessly, and continues to do so.

Alternatively, if parties or the Commission have concerns with this approach, CMP seeks leave pursuant to Chapter 110 of the Commission’s Rules and Regulations, Central Maine Power Company (“CMP”) to enter a late-filed intervention in the proceeding and submit Reply Briefs. In that case, CMP petitions the Commission to permit the Company to intervene as a party to this proceeding for the limited purpose of providing a short Reply statement to statements made in the docket. CMP has no objection to affording parties time to offer a sur-reply should they wish to address any

points raised herein. CMP proceeds below with a summary of the ISO-NE study process and timelines.

## **II. Statement of Central Maine Power Company**

As a threshold point, CMP takes no position on whether the Commission should grant or deny the good cause exemption requests at issue in this proceeding. CMP aims to merely explain the ISO-NE process, CMP's role, and emphasize that CMP has met its obligations thereunder.

### **a. Cluster Study Overview**

CMP is required by the Integrated System Operator of New England ("ISO-NE") to perform transmission level reliability studies pursuant to ISO-NE Interconnection Requirements to assess how best to efficiently enable interconnection of high volumes of clean Distributed Energy Resources ("DERs") while preserving the reliability of the bulk Electric System ("BES"). The result is an ISO-NE Open Access Transmission Tariff, Section I.3.9 Approval for the new interconnections. These reliability studies, referred to as "cluster studies" represent high penetrations of DERs and have become increasingly complex as they assess future scenarios where large high inertia base load generators are displaced by numerous small and intermittent solar inverter-based DERs which are highly sensitive to system disturbances. CMP, in collaboration with ISO-NE, has established a cluster study approach that has sought an efficient balance between enabling large levels of clean DER interconnections and the preservation of grid reliability. ISO-NE, as the planning authority for New England BES reliability, has oversight authority

regarding the scope and extent of studies required to demonstrate that interconnections do not have an adverse impact on BES reliability performance. As such, ISO-NE has responded to increasing DER adoption levels and lessons learned from other jurisdictions with evolving and increasingly complex study requirements in order to make a conclusive determination of no adverse reliability impact on the BES (i.e., final Section I.3.9 project approval).

DERs pose a unique and complex, but manageable challenge, whereby the highly sensitive inverter-based DERs must be kept in balance with customer load at all times. Therefore, a comprehensive steady state and dynamic assessment of DER interconnections is the method used to ensure the power system will remain within safe operating limits, thereby avoiding unstable operating conditions that could result in cascading or widespread outages, and/or unsafe operating circumstances. In performing the studies, CMP works closely with ISO-NE to ensure that cluster studies (1) follow the proper ISO-NE study process, including all ISO-NE study requirements, (2) consider generation from queued FERC projects, and (3) are complete and comprehensive so that final study results support ISO-NE project approval. CMP also keeps cluster project participants informed of all stages of the study process including during weekly meetings with individual clusters, monthly meetings with all cluster participants, and various workshops hosted by CMP.

**b. Cluster Study Timing**

The timeline for completion of cluster studies can be interrupted by a host of factors. Hence, the study process timeline is subject to change due to the incredible complexity of all that is involved.

First, the timeline is dependent on parallel FERC project interconnections. All FERC generator projects take precedence over DERs that do not yet have ISO New England Section I.3.9 approval, as mandated by the ISO New England process. Therefore, FERC projects coming under study or withdrawing during the course of the existing cluster studies prompt the need for additional study scenarios. Performing these additional study scenarios results in a change in the estimated study completion date as DER cluster studies must consider the impact of new proposed interconnections as they come under study in the ISO-NE queue.

Additionally, if a pre-existing condition on CMP's transmission system is made worse by new FERC interconnecting projects, the cluster project interconnections could be delayed as required to allow time for pre-existing needs to be resolved or an alternate solution can be implemented. This situation is outside CMP control and will continue to impact the cluster study timelines as the FERC queue continues to change.

Likewise, timeline changes caused by Power-System Computer Aided Design ("PSCAD") mitigation issues are anticipated delays that CMP has regularly presented to developers as a risk and is impacted by the FERC queue. The PSCAD assessment is a necessary process for interconnection safety and reliability, and additional mitigation recognized by these assessments is a needed requirement of the review process.

#### **i. Overview of the Steps in the Study Process**

Once a cluster area is established, it is assessed in two distinct phases. Phase 1 establishes the scope and cost of the preliminary mitigation upgrades required to interconnect all DERs in a proposed cluster. After completion of this first phase assessment there is an opportunity for developer attrition, where each developer can decide if their project remains viable and if they wish to advance to the final Phase 2 assessment. The second phase, Phase 2, includes a comprehensive re-assessment study matching the first phase study scope with the remaining Phase 2 cluster participants. In addition, Phase 2 also requires completion of a highly specialized Power-System Computer Aided Design (PSCAD) analysis. In the event the PSCAD analysis detects additional necessary mitigation upgrades, such upgrades are allocated to cluster participants. At the conclusion of the final Phase 2 assessment, all mitigation upgrades and costs will have been estimated and allocated and the study is ready for submittal to ISO-NE for Section I.3.9 approval at a NEPOOL Reliability Committee. At this final stage CMP seeks concurrence and approval on behalf of the cluster participants that the proposed cluster project with any necessary mitigating upgrades does not have a material adverse impact on the BES. ISO-NE has the ability to deny approval at this stage and/or request CMP re-study the cluster, and thus it is important that cluster studies be completed in accordance with changing ISO-NE rules, which are sometimes amended mid-study.

**c. CMP Has Met Its Obligations**

CMP strongly refutes any suggestion or accusation that it has delayed the cluster study process. The CMP team has worked tirelessly and diligently with developers on

potential time and cost-saving solutions caused by needed transmission upgrades. CMP cannot avoid or foresee specific cluster timeline changes caused by FERC project interconnections, required study analyses, or other cluster study dependencies, but these factors are known timeline influencers as evidence by their inclusion in the Commission's March 23, 2023, Order in Docket Nos. 2021-00035, 00262, and 00270.<sup>1</sup> Again, the nature of the cluster study process is subject to change given the complexity. These issues, which are recognized as outside of CMP's control, drive cluster study timeline changes as FERC interconnection queue interactions, PSCAD mitigation, and cluster dependency<sup>2</sup> account for all timeline changes presented by CMP since November 2022.<sup>3</sup>

**d. Conclusion**

CMP reiterates that it has met the extraordinary obligation of undertaking and managing the ISO-NE cluster study process, has kept developers apprised at every stage of the process, and emphasizes that the process itself is subject to change.

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<sup>1</sup> "CMP shall meet the most recent published cluster study timelines, attached hereto as Attachment A (the "Cluster Study Timelines"), **subject to the qualifications set forth in the Cluster Study Timelines for changes that CMP could not reasonably foresee or avoid** (such as exceptionally complex mitigation [pre or post PSCAD analysis], ISO-NE queued projects triggering unforeseen re-assessments, or restudies needed due to the impacts of attrition), plus up to an additional 20 business days to allow for queue attrition between cluster study phases." (Order at Page 5, Stipulation Term 15, emphasis added).

<sup>2</sup> Cluster dependency refers to when one later cluster study is dependent of the finalization and results of an earlier study.

<sup>3</sup> See generally timelines filed by CMP in Docket Nos. 2021-00035, 00262, and 00270, including the Company's May 20, 2022, "Report Concerning Cluster Study Timeline Changes," May 23, 2022,

Respectfully submitted,



Carlisle Tuggey, General Counsel

/s/ Katherine McDonough

Katherine McDonough  
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Company