

Changes to the Generator Interconnection Process

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Killington, VT
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How does a generator interconnect in VT?

- Dependent on various factors
  - Size thresholds (MW)
  - Point of Interconnection (transmission, subtransmission, distribution)
- Agnostic to fuel type
- Must follow both ISO-NE and VT processes





Size Thresholds

ISO-NE process requirements increase as project size increases

Below 1 MW

State and DU process

No ISO-NE requirement for behind-the-meter projects

1 – 4.999 MW

State jurisdictional

ISO-NE notification
Level 0 or Level 3 Proposed Plan Application

5 – 19.999 MW

Small Generation Interconnection Process

ISO-NE Schedule 23

20 MW and above

Large Generation Interconnection Process

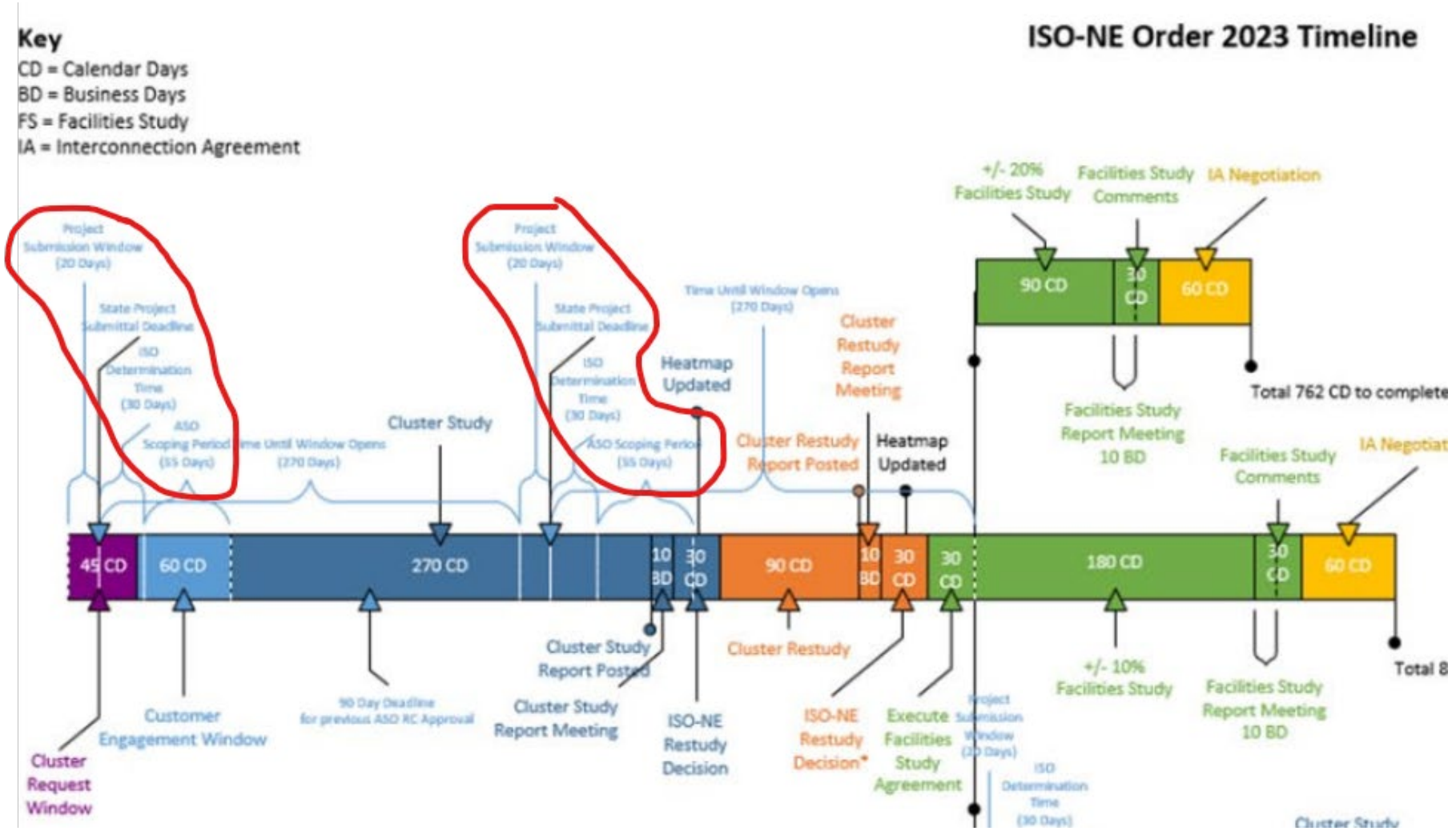
ISO-NE Schedule 22

State-jurisdictional projects from 1 MW to 4.999 MW

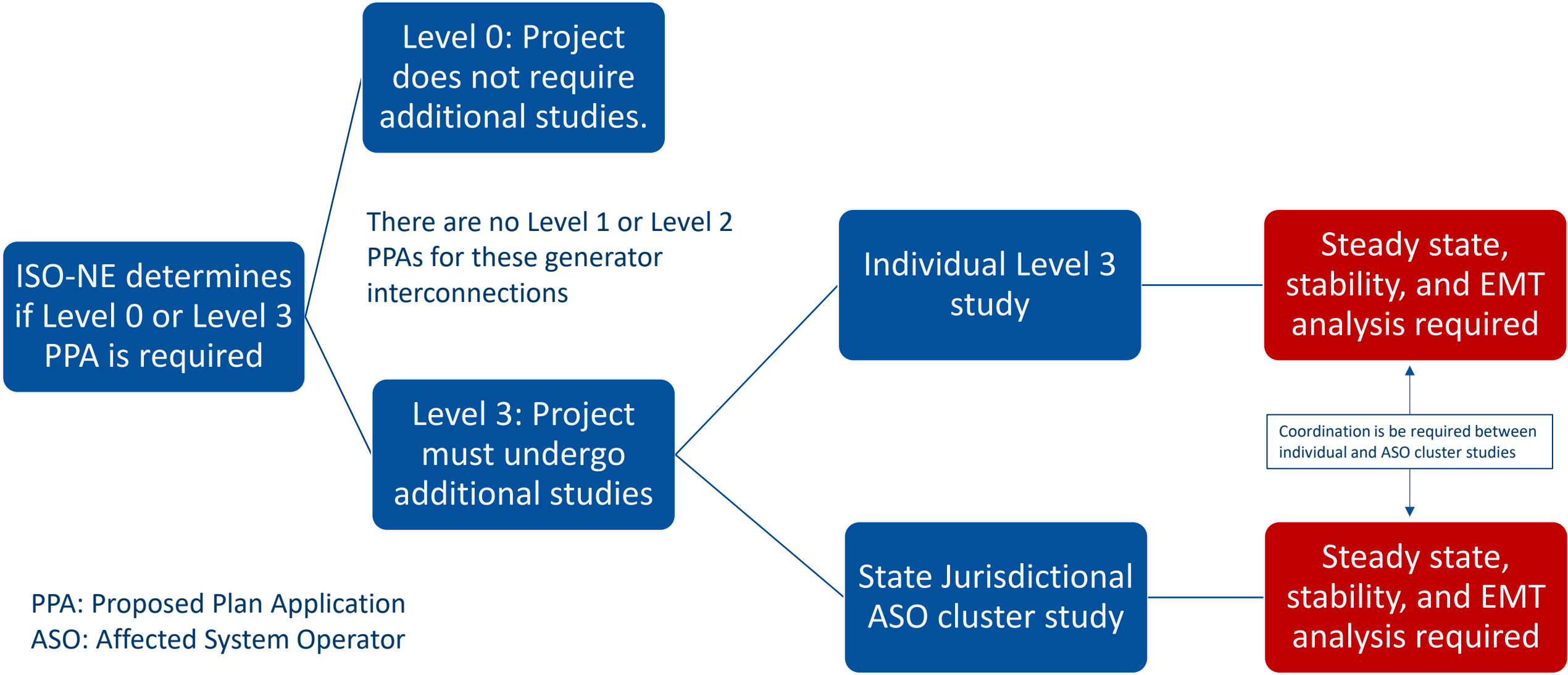
How ISO-NE determines whether Level Three analysis is required



How the State Jurisdictional Projects fit into the ISO-NE Cluster Study Process



Level 0 vs Level 3 Proposed Plan Application Process



PPA: Proposed Plan Application
ASO: Affected System Operator

Change to how Level 3 Determination is made

Common technical steps

1. Map the project to the nearest 115+ kV station
2. Study a three-phase fault at that station
3. Define the electrically close area as described in PP5-6, Attachment I

BEFORE OCTOBER 5, 2026

All projects counted

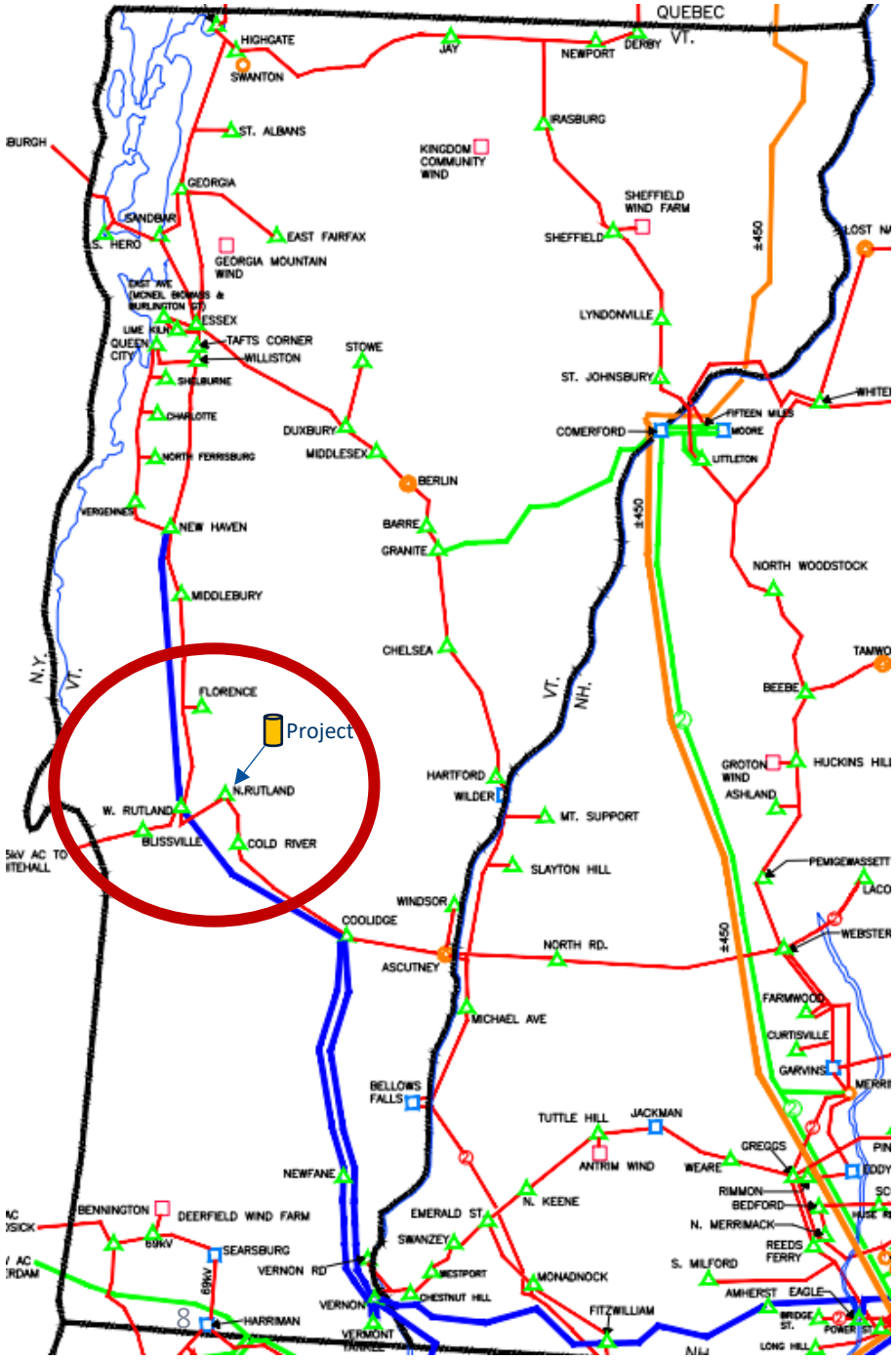
Existing and proposed 1–5 MW projects inside the electrically close area contributed to the threshold.

BEGINNING OCTOBER 5, 2026

Window projects count

Only proposed 1–5 MW projects submitted during the state-jurisdictional project window contribute to the threshold. ***Existing projects do not count.***

If the total reaches the 20 MW threshold, ISO-NE requires Level 3 analysis.

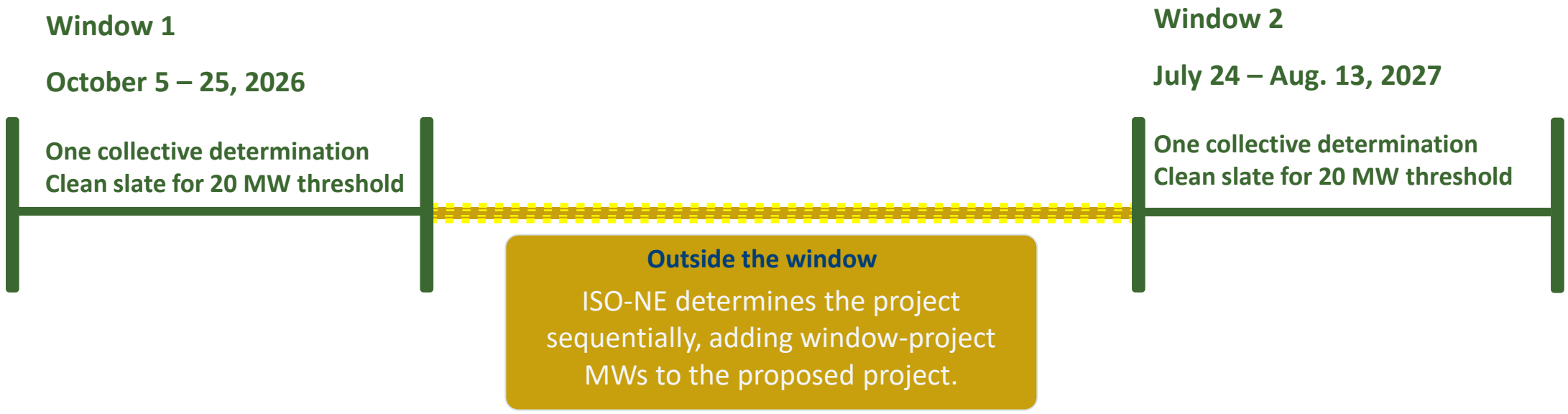


Example of Determination Process

- Proposed Project: 4.99 MW Battery
- POI: Pittsford 12.5kV distribution
- Nearest 115 kV bus: North Rutland substation
- Fault simulated on North Rutland 115 kV bus
- Area of low voltage contains North Rutland, Florence, Cold River, West Rutland, Blissville substations
- Other proposed projects submitted in window: 3.5 MW solar @ Cold River, 4.99 MW battery @ Blissville, 2.2 MW solar @ North Rutland
- Total in “electrically close” area: 15.68 MW
- Determination: Level 0 PPA

Timing of Project Submittal is Important

Projects inside a submission window are assessed together. Project outside the window are assessed sequentially.



During the Project Submission Window



FAQ

QUESTION

Could each “electrically close” region have 19.9 MWs of projects submitted every year and never be studied?

Yes

QUESTION

How do we ensure that reliability is maintained if no Level 3 studies are done?

- ISO-NE Vermont Needs Assessment
- VELCO’s Long-Range Transmission Plan

QUESTION

What is the current state of the project submission window?

- 21 projects sent to ISO-NE
- All solar or BESS
- 92 MWs of total capacity
- Awaiting determinations from ISO-NE

Key Takeaways

Three practical implications for developers, distribution utilities and planners

01

Use the window

Projects submitted in the window have a lower likelihood of requiring Level 3 studies.

02

Look beyond the POI

The determination reflects the electrically close area, not only the interconnection point.

03

Coordinate early and often

Developer, DU, VELCO, and ISO-NE coordination shapes a reliable submission.

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