

July 13, 2015

**By Electronic Delivery**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First St, NE  
Washington, DC 20426

**Re: *New York Independent System Operator, Inc. and New York Transmission Owners, Interregional Compliance Filing, Docket Nos. ER13-1942-\_\_\_\_, ER13-1946-\_\_\_\_, ER13-1957-\_\_\_\_***

Dear Ms. Bose:

Pursuant to the Federal Energy Regulatory Commission's ("Commission") Electronic Tariff Filings Order No. 714<sup>1</sup> and Section 35.1(a) of the Commission's regulations,<sup>2</sup> the New York Independent System Operator, Inc. ("NYISO") submits a Designation of Filing Party designating ISO New England, Inc. ("ISO-NE") as the filing party for the Amended and Restated Northeastern ISO/RTO Planning Coordination Protocol ("Protocol")<sup>3</sup> in the above-entitled matter.

**I. DESCRIPTION OF FILING**

On July 13, 2015, ISO-NE filed a Certificate of Concurrence regarding the Protocol on behalf of the NYISO with respect to ISO-NE's filing of the Protocol among and between the NYISO, PJM Interconnection, L.L.C. and ISO-NE. The NYISO hereby files a Designation of Filing Party regarding the Protocol submitted by ISO-NE on July 13, 2015.

**II. COMMUNICATIONS**

Communications and correspondence regarding this filing should be directed to:

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<sup>1</sup> Electronic Tariff Filings, Order No. 714, III FERC Stats. & Regs. ¶ 31,276 (2008) (Order No. 714).

<sup>2</sup> 18 C.F.R. § 35.1(a).

<sup>3</sup> Designated: ISO New England, Inc. Agreements and Contracts, Northeastern ISO/RTO Planning Coordination Protocol.

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### **III. DOCUMENTS ENCLOSED**

Along with this filing letter, the NYISO submits the following documents:

1. The NYISO's Designation of Filing Party ("Attachment I"); and
2. The NYISO's Certificate of Concurrence as filed by ISO-NE ("Attachment II").

### **IV. EFFECTIVE DATE AND WAIVER REQUEST**

The NYISO requests an effective date of July 13, 2015 for the Designation of Filing Party, which is the date on which ISO-NE filed the NYISO's Certificate of Concurrence with respect to the filing of the Protocol. Pursuant to Section 35.11 of the Commission's regulations,<sup>5</sup> the NYISO respectfully requests that the Commission waive its 60-day notice requirement under Section 35.3(a) of the Commission's regulations,<sup>6</sup> and make this filing effective July 13, 2015. The Commission's policy permits waivers of the 60-day prior notice requirement in cases involving non-rate changes to the terms and conditions of a Commission-accepted filing.<sup>7</sup> Such

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<sup>4</sup> Waiver of the Commission's regulations (18 C.F.R. § 385.203(b)(3) (2012)) is requested to the extent necessary to permit service on counsel for the NYISO in both Richmond, VA and Washington, DC.

<sup>5</sup> 18 C.F.R. § 35.11.

<sup>6</sup> 18 C.F.R. § 35.3(a).

<sup>7</sup> See *Cent. Hudson Gas & Elec. Corp.*, 60 FERC ¶ 61,106, *reh'g denied*, 61 FERC ¶ 61,189 (1992).

a waiver will allow the Designation of Filing Party to be posted and effective on the NYISO's website on the same date as ISO-NE's filing of the Protocol. Granting the waiver will not adversely affect any entity; it would simply permit the NYISO and other parties to the Protocol to take advantage of the Commission's certificate of concurrence procedures. To the extent that the Commission determines that any requirements of 18 CFR § 35 apply that have not been specifically addressed herein, the NYISO respectfully requests a waiver of such requirements.

## **V. SERVICE**

The NYISO will send an electronic copy of this filing to the official representative of each party to these proceedings, to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission and the New Jersey Board of Public Utilities. In addition, the complete public version of this filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com).

## **VI. CONCLUSION**

The NYISO respectfully requests that the Commission accept this filing effective July 13, 2015.

Respectfully submitted,

By: /s/ Carl F. Patka

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