

March 11, 2016

Submitted Electronically

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: New York Independent System Operator, Inc. Compliance Filing;
Docket Nos. ER16-168-000 and -001

Dear Ms. Bose:

In accordance with Paragraph 46 and Ordering Paragraph (B) of the Federal Energy Regulatory Commission’s (“Commission’s”) February 18, 2016 *Order Accepting Proposed Tariff Revisions Subject to Condition* (“February Order”),¹ the New York Independent System Operator, Inc. (“NYISO”) hereby submits compliance revisions to Section 23.3.1.1.2 of the NYISO’s Market Administration and Control Area Services Tariff (“Services Tariff”).

The February Order directs the NYISO to apply the same verification requirement to the physical withholding exemption related to unauthorized natural gas as it applies to the physical withholding exemption for forced outages in Services Tariff Section 23.3.1.1.2.² Consistent with the Commission’s instructions, the attached Tariff revisions add a verification requirement to the exemption from physical withholding evaluation for generators that indicate they are unable to provide output in the Real-Time Market because doing so would require the Generator to burn unauthorized natural gas. The proposed additional verification requirement language – “subject to verification by the ISO as may be appropriate” – is the same as the Commission accepted language related to exempting forced outages from physical withholding evaluation.

I. LIST OF DOCUMENTS SUBMITTED

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

1. a blacklined version of the NYISO’s revisions to Section 23.3.1.1.2 of its Services Tariff (Attachment I); and

¹ *New York Independent System Operator, Inc.*, 154 FERC ¶ 61,111 (2016).

² *Id.* at P 46.

2. a clean version of the NYISO's revisions to Section 23.3.1.1.2 of its Services Tariff (Attachment II).

II. EFFECTIVE DATE

The NYISO requests that the Commission permit the Tariff revisions provided herewith to become effective February 18, 2016, the effective date of the Tariff revisions accepted in the February Order.

III. SERVICE

The NYISO will send an electronic link to this filing to the official representative of each party to this proceeding, to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, the complete filing will be posted on the NYISO's website at www.nyiso.com.

IV. CONCLUSION

The NYISO respectfully requests that the Commission accept the Tariff revisions included in the Attachments to this filing, without modification, effective February 18, 2016.

Respectfully submitted,

/s/ James H. Sweeney

James H. Sweeney, Attorney
New York Independent System Operator,
Inc.

cc: Michael Bardee
Anna Cochrane
Kurt Longo
Max Minzner
Daniel Nowak
Larry Parkinson
J. Arnold Quinn
Douglas Roe
Kathleen Schnorf
Jamie Simler
Gary Will