

December 20, 2019

By Electronic Delivery

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

**Re: New York Independent System Operator, Inc.
Docket No. ER19-467-000**

Dear Secretary Bose:

On December 3, 2018, the New York Independent System Operator, Inc. (“NYISO”) submitted modifications to its Open Access Transmission Tariff (“OATT”) and Market Administration and Control Area Services Tariff (“Services Tariff”) establishing a participation model for Energy Storage Resources (the “Compliance Filing”)¹ consistent with the requirements of Federal Energy Regulatory Commission (“Commission”) Order No. 841.² The NYISO proposed to make the tariff modifications effective no earlier than May 1, 2020, and advised the Commission that the specific effective date was contingent, in part, upon completion of an on-going upgrade of the NYISO’s Energy Management System and Business Management System (“EMS/BMS”). In order to provide the Commission and stakeholders an update on its progress, the NYISO proposed to submit an informational filing in this docket upon the completion of the EMS/BMS upgrade. In subsequent communications with representatives of the New York Transmission Owners, the NYISO further agreed to submit an additional informational filing in the event that the EMS/BMS upgrade project is not completed in 2019.³

The NYISO submits this informational filing to advise its stakeholders and the Commission that the EMS/BMS upgrade is expected to be completed in the first quarter of 2020.⁴ The NYISO anticipated transitioning to the new EMS/BMS on October 31, 2019, but delayed implementation due

¹ *New York Independent System Operator, Inc.*, Compliance Filing and Request for Extension of Time of Effective Date, Docket No. ER19-467-000 (Dec. 3, 2018).

² *Electric Storage Participation in in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order No. 841, 162 FERC ¶ 61,127 (Feb. 15, 2018), 83 Fed. Reg. 9580 (Mar. 6, 2018), Errata Notice (Feb. 28, 2018) (“Order No. 841”).

³ *New York Transmission Owners*, Motion to Intervene, Limited Protest, and Comments, Docket No. ER19-467-000 (May 22, 2019) at 10-11 (“...the NYISO has agreed to make an informational filing no later than December 31, 2019, to advise stakeholders on the completion date of the software upgrades. If it becomes apparent that the [EMS/BMS] software will not be deployed in the fourth quarter of 2019, the NYISO agrees to make the informational filing prior to December 31, 2019 in order to notify stakeholders of the delayed deployment.”).

⁴ The NYISO also notified stakeholders of the EMS/BMS delay via electronic mail on October 25, 2019.

to several unresolved issues that were both critical to the success of the NYISO's operations, and subject to various constraints that were outside of the NYISO's control.

The NYISO has now completed development of the necessary software to address the unresolved issues, and has initiated final testing of the EMS/BMS. The NYISO expects the EMS/BMS to become operable in March 2020.⁵ The NYISO notes that the Commission today issued an Order on the NYISO's compliance filing in this proceeding. The NYISO is currently reviewing that Order, including the May 1, 2020 effective date reflected therein, and the Commission directed revisions to the proposed participation model.

Respectfully submitted,

/s/ Gregory J. Campbell

Gregory J. Campbell

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⁵ The NYISO may be able to transition to the new EMS/BMS in the month of February if weather and operating conditions are such that the transition would not cause undue operating risks.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 20th day of December 2019.

/s/ Mohsana Akter

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