

December 1, 2020

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.*,
Compliance Filing Establishing a December 15, 2020 Effective Date for the Pricing of
Fast-Start Resources; Docket No. ER20-659-00_.

Dear Secretary Bose:

On December 20, 2019, the New York Independent System Operator, Inc. (“NYISO”) submitted proposed tariff revisions in this Docket (“December 2019 Filing”) to allow Fast-Start Resources’ commitment costs to be reflected in prices and to allow the relaxation of all dispatchable Fast-Start Resources’ minimum operating limits by up to 100 percent for the purpose of setting prices in accordance with the Federal Energy Regulatory Commission’s (“Commission’s”) April 18, 2019 *Order on Paper Hearing*.¹ The tariff revisions proposed in the December 2019 Filing are collectively referred to as the “Fast-Start Pricing Revisions” in this filing. The NYISO’s December 2019 Filing requested a flexible effective date during the fourth quarter of 2020 to implement its Fast-Start Pricing Revisions. The Commission accepted the NYISO’s Fast-Start Pricing Revisions in a Letter Order issued on February 6, 2020 (“February 2020 Order”) and directed the NYISO to submit a compliance filing providing no less than two weeks’ notice of the proposed effective date of the tariff revisions.² The NYISO hereby submits notice that it intends to make the Fast Start Pricing Revisions effective on December 15, 2020.

This filing sets the December 15, 2020 effective date for the revisions to NYISO’s Market Administration and Control Area Services Tariff (“Services Tariff”) Sections 2.6, 4.4.1.2.1 and 17.1.1.2, and to Open Access Transmission Tariff (“OATT”) Section 1.6 that the Commission accepted in its February 2020 Order.

After the December 2019 Filing, the NYISO identified further revisions to Services Tariff Sections 4.4.1.2.1 that are necessary to implement the Fast-Start Pricing Revisions. The NYISO addressed the revisions in a Federal Power Act Section 205 filing submitted on April 30, 2020 in

¹ *Order on Paper Hearing*, Docket No. EL18-33-000, 167 FERC ¶ 61,057 (April 18, 2019).

² *New York Indep. Sys. Operator, Inc.*, Letter Order, Docket No. ER20-659-000 (February 6, 2020).

Docket No. ER20-1696 (“April 2020 Filing”).³ The April 2020 Filing deleted the phrase “or Regulation Service Bids” from the revisions to Services Tariff Section 4.4.1.2.1 that the Commission accepted in its February 2020 Order in Docket No. ER20-659. The Commission accepted the proposed revision to the fast-start rules in a June 17, 2020 letter order in Docket No. ER20-1696.⁴ The revisions to Services Tariff Section 4.4.1.2.1 that NYISO proposes to make effective on December 15, 2020 incorporate this change.

In order to illustrate removing the phrase “or Regulation Service Bids” from the fast-start rules in Services Tariff Section 4.4.1.2.1, the redline version of Services Tariff Section 4.4.1.2.1 from the April 2020 Filing is included for reference with this filing as Attachment III.

In addition to the fast-start Tariff revisions that the Commission has already considered, the NYISO recently identified the need for further revisions to Services Tariff Sections 4.4.1.2.1 and 17.1.1.2. The proposed revisions that NYISO will file for the Commission’s consideration on or about December 7, 2020 will clarify how the NYISO’s Real-Time Commitment and Real-Time Dispatch software will incorporate Fast-Start Resources’ start-up costs into LBMPs.⁵ The NYISO Management Committee approved these proposed revisions on November 18, 2020.⁶

The NYISO anticipates submitting the proposed additional revisions to the Commission on December 7, 2020 under Federal Power Act Section 205 and, unless the Commission instructs otherwise, the NYISO intends to implement the clarifying revisions along with its accepted Fast Start Pricing Revisions on December 15, 2020.⁷ The additional clarifying changes to Services Tariff Sections 4.4.1.2.1 and 17.1.1.2 that NYISO plans to file on December 7, 2020 are *not* included in or submitted with this filing.

I. Documents Submitted with this Filing Letter

1. A clean version of the accepted revisions to the Open Access Transmission Tariff (“OATT”) with an effective date of December 15, 2020 (“Attachment I”);
2. A clean version of the accepted revisions to the Market Administration and Control Area Services Tariff (“Services Tariff”) with an effective date of December 15, 2020 (“Attachment II”); and
3. For reference, the redline version of NYISO Services Tariff Section 4.4.1.2.1 that was submitted with the NYISO’s April 2020 Filing (“Attachment III”).

³ *New York Indep. Sys. Operator, Inc.*, April 30, 2020 Filing, Docket No. ER20-1696-000.

⁴ *New York Indep. Sys. Operator, Inc.*, Letter Order, Docket No. ER20-1696-000 (June 17, 2020).

⁵ Capitalized terms not otherwise defined herein shall have the meaning specified in the Services Tariff and OATT.

⁶ See Enhanced Fast-Start Pricing Presentation to the Management Committee, available at <https://www.nyiso.com/documents/20142/16885911/07%20Enhanced%20Fast%20Start%20Pricing.pdf/6abe60de-2799-1b64-0d19-0c3cb435af4a>.

⁷ The NYISO’s upcoming Federal Power Act Section 205 filing will respectfully request that the Commission waive the 60-day prior notice requirement set forth in Section 35.3(a)(1) of its regulations to permit the tariff revisions to go into effect on December 15, 2020. However, the NYISO does not intend to request expedited Commission action on the filing.

II. Notice of Effective Date

In compliance with the February 2020 Order, the NYISO hereby provides notice that it expects to implement the accepted revisions on December 15, 2020. The tariff revisions will become effective in the Real-Time Market immediately after the software deployment on December 15, 2020. The first Day-Ahead Market day to incorporate the tariff revisions will be the December 17, 2020 market day, which will run during the morning of December 16, 2020. The NYISO will promptly notify the Commission and its Market Participants if it determines that it will not be able to implement the tariff amendments on December 15, 2020.

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 New York Independent System Operator, Inc. respectfully requests that the Commission accept this compliance filing and the proposed effective date of December 15, 2020 for the tariff revisions referenced herein.

Respectfully submitted,

/s/ James H. Sweeney

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