

January 15, 2021

By Electronic Delivery

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

Re: New York Independent System Operator, Inc., Proposed Clarification to Tailored Availability Metric Tariff Provisions, Docket No. ER21-____-000

Dear Ms. Bose:

In accordance with Section 205 of the Federal Power Act (“FPA”),¹ the New York Independent System Operator, Inc. (“NYISO”) hereby submits proposed revisions to its Market Administration and Control Area Services Tariff (“Services Tariff”) that provide clarity to its recently accepted “tailored availability metric” rules (“TAM Rules”).²

The tariff revisions proposed in this filing clarify that the TAM Rules do not apply to Special Case Resources³ (“SCRs”) and that the new metrics will apply to all Intermittent Power Resources, which include landfill gas resources. With these proposed changes it is clear that the TAM Rules apply to Generators (including all Intermittent Power Resources), System Resources, Energy Limited Resources, and municipally owned generation. The NYISO also respectfully requests that the Commission issue an order accepting the proposed tariff revisions within sixty days after this filing with an effective date of March 17, 2021 (*i.e.*, the day following the end of the statutory 60-day notice period) for the tariff revisions proposed herein.⁴

¹ 16 U.S.C. §824d (2018)

² The TAM Rules were initially filed with and accepted by the Commission in the third quarter of 2020 and have an effective date of March 1, 2021. These new metrics will enhance the calculation of capacity ratings Resources that participate in the NYISO-administered Installed Capacity (“ICAP”) Market to better align with the reliability needs of the system.

³ Capitalized terms that are not otherwise defined herein shall have the meaning specified in the Services Tariff.

⁴ The TAM Rules will be first implemented for the Summer 2021 Capability Period in the Installed Capacity Market.

I. COMMUNICATIONS

Communications regarding this proceeding should be sent to:

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II. LIST OF DOCUMENTS SUBMITTED

The NYISO submits the following documents with this transmittal letter:

1. A blacklined version of the NYISO Services Tariff revisions proposed in this filing (“Attachment I”); and
2. A clean version of the NYISO Services Tariff revisions proposed in this filing (“Attachment II”).

III. PROPOSED TARIFF REVISIONS

First, the NYISO seeks to clarify that the TAM Rules do not apply to SCRs and, therefore, do not modify the current methodology for calculating Unforced Capacity for SCRs. The NYISO proposes to add explicit language maintaining the current treatment for calculating the performance and UCAP associated with SCRs. Specifically, the NYISO proposes to add the following sentence to Section 5.12.6.2 of the Services Tariff: “Starting with the Capability Year beginning May 1, 2021, the ISO shall calculate separate Summer and Winter Capability Period Unforced Capacity values for each Special Case Resource and update them periodically using a twelve-month calculation in accordance with ISO Procedures.”

The NYISO also proposes revisions to clarify that calculations under the TAM Rules will apply to types of Installed Capacity Resources other than SCRs (*i.e.*, Generators, System Resources, Energy Limited Resources, and municipally owned generations) beginning on May 1, 2021. To make this clear, the NYISO is proposing to add the list of Resource types into the sentence that generally describes the calculation that applies under the TAM Rules beginning

May 1, 2021. With the proposed additional language shown underlined below, the revised sentence reads:

Starting with the Capability Year beginning May 1, 2021, the calculation for each Generator, System Resource, Energy Limited Resource, and municipally owned generation will use the months comprising the two most recent like Capability Periods in accordance with formulae provided in the ISO Procedures; provided, however, except as provided in Section 5.12.6.2.1 of this Services Tariff, for a Generator in an outage state that started on or after May 1, 2015 and that precluded its eligibility to participate in the Installed Capacity market at any time during any month from which GADS or other operating data would otherwise be used to calculate an individual Equivalent Demand Forced Outage Rate, the ISO shall replace such month's GADS or other operating data with GADS or other operating data from the most recent like month in which the Generator was not in an outage state that precluded its eligibility to participate in the Installed Capacity market.

Finally, the NYISO proposes tariff revisions to clarify that the TAM Rules apply to all Intermittent Power Resources. The proposed revisions to the Services Tariff replace the phrase "wind and solar Resources" where it currently appears in Sections 5.12.14.3 (v), 5.12.14.3.5, 5.12.14.3.7, and 5.12.14.3.8 with the tariff-defined term "Intermittent Power Resources." Intermittent Power Resources currently include wind, solar and landfill gas facilities. This change removes any potential ambiguity due to the exclusion of naming landfill gas as a resource in these sections of the tariff.

IV. STAKEHOLDER REVIEW

The proposed tariff revisions that are included in this filing were approved by the NYISO's stakeholder Management Committee on December 16, 2020. The proposal was passed unanimously without abstentions. The NYISO Board of Directors approved the proposed tariff revisions on January 11, 2021.

V. REQUESTED EFFECTIVE DATE

The NYISO respectfully requests that the Commission issue an order accepting the proposed tariff revisions within sixty days after this filing with an effective date of March 17, 2021 (*i.e.*, the day following the end of the statutory 60-day notice period) for the tariff revisions proposed herein.

VI. 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.

VIII. CONCLUSION

In conclusion, the NYISO respectfully asks that the Commission accept the proposed clarifications to the TAM Rules, and make them effective on March 17, 2021, without imposing any conditions and without instituting any further proceedings.

Respectfully Submitted,

/s/ David Allen

David Allen

Senior Attorney

New York Independent System Operator, Inc.

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