

March 9, 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.* Docket Nos. ER19-2276-000, *et al.*;
Compliance Filing Establishing an Effective Date for Revisions to Market
Administration and Control Area Services Tariff Section 13

Dear Ms. Bose:

In accordance with the requirements of the Federal Energy Regulatory Commission's ("Commission") January 23, 2020 *Order Accepting Tariff Revisions and Directing Compliance Filing and Informational Report* (the "DER Order"),¹ the New York Independent System Operator, Inc. ("NYISO") submits this filing to provide notice of a March 31, 2021, effective date for revisions to Market Administration and Control Area Services Tariff ("Services Tariff") Section 13.2 related to metering and telemetry requirements.²

I. Documents Submitted

1. This filing letter; and
2. A clean version of the accepted revisions to Market Administration and Control Area Services Tariff ("Services Tariff") Section 13.2 with an effective date of March 31, 2021 ("Attachment I").

II. Background

On June 27, 2019, the NYISO proposed a comprehensive set of tariff revisions that will enable Distributed Energy Resource participation in the NYISO's Energy, Ancillary Services, and Installed Capacity markets (the "DER Filing").³ The DER Filing included modifications to Services Tariff Section 13.2 that require Customers to (i) install and maintain real-time telemetry hardware and infrastructure, and (ii) deliver real-time telemetry for Generators nominally every

¹ *New York Indep. Sys. Operator, Inc.*, 170 FERC ¶ 61,033 (2020).

² Capitalized terms that are not defined in this filing letter are defined in Section 1 of the Open Access Transmission Tariff and Section 2 of the Services Tariff.

³ *New York Indep. Sys. Operator, Inc.*, Proposed Tariff Revisions Regarding Establishment of Participation Model for Aggregations of Resources, Including Distributed Energy Resources, and Proposed Effective Dates, Docket No. ER19-2276-000 (Jun. 27, 2019).

six (6) seconds.⁴ The NYISO also proposed to provide additional telemetry specification and standards in the ISO Procedures, including how the NYISO will remedy telemetry data errors.⁵

On January 29, 2021, the NYISO submitted tariff revisions to the Commission under section 205 of the Federal Power Act in Docket No. ER21-1001-000, proposing new interconnection and market rules to permit Co-located Storage Resources (“CSR”) to participate in the ISO Administered Markets.⁶ CSR are a wind or solar Intermittent Power Resource and an Energy Storage Resource (two Generators) that: (a) are both located behind a single Point of Injection; (b) participate in the ISO Administered Markets as two distinct Generators; and (c) share a set of CSR Scheduling Limits.⁷ In the course of developing the CSR proposal, the NYISO identified necessary metering and telemetry infrastructure configuration improvements that will enhance real-time situational awareness for grid operators and enable accurate after-the-fact financial settlement of the Energy Storage Resource and the Intermittent Power Resource that participate as CSR. As explained in the NYISO’s CSR filing,⁸ the revisions to Services Tariff Section 13.2 that were submitted by the NYISO in its DER Filing and accepted by the Commission in its DER Order⁹ are a necessary component of the NYISO’s enhanced metering and telemetry requirements to implement CSR. The NYISO explained the need to make the DER revisions to Services Tariff Section 13.2 effective early to its stakeholders.¹⁰ The NYISO’s Management Committee approved the CSR proposal unanimously (with a few abstentions).

The NYISO has proposed to make its CSR-specific interconnection rules effective on March 31, 2021 in order to permit developers of CSR to submit (or consolidate existing) interconnection requests starting on that date.¹¹ It is appropriate to make the proposed DER revisions effective on March 31, 2021 because they address metering and telecommunications requirements that need to be addressed in order to interconnect and register new Generators that will participate in the NYISO’s markets as CSR.

⁴ *Id.* at 58-59.

⁵ *Id.*

⁶ *New York Indep. Sys. Operator, Inc.*, Proposed Tariff Revisions to Implement Co-located Storage Resources, Docket No. ER21-1001-000 (Jan. 29, 2021) (“CSR Filing”).

⁷ *Id.* at 8-9 (overview of CSR filing).

⁸ *Id.* at 3, 23 and Attachment I.

⁹ DER Order at P 74.

¹⁰ See Hybrid Storage Model: Co-located Storage Resources (CSR) Market Design Proposal, Management Committee Meeting Presentation (Nov. 18, 2020) at 20, *available at*: https://www.nyiso.com/documents/20142/16885911/08%20Hybrid%20Storage_CSR.pdf/4794c242-a7dd-dc8e-7571-5b4d443a4198.

¹¹ See CSR Filing at 40.

For the foregoing reasons, the NYISO proposes to make the identified revisions to Services Tariff Section 13.2 effective on March 31, 2021, in advance of the other DER tariff revisions that the NYISO submitted in Docket No. ER19-2276-000 with a future effective date.¹²

III. Notice of Effective Date

In compliance with the *DER Order*, the NYISO hereby provides notice that it expects to implement the accepted revisions on March 31, 2021. 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 March 31, 2021.

IV. 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.

V. Conclusion

The New York Independent System Operator, Inc. respectfully requests that the Commission permit the revisions to Section 13.2 of the NYISO's Services Tariff that it accepted for filing in its DER Order to become effective on the NYISO's proposed effective date of March 31, 2021.

Respectfully submitted,

/s/ Gregory J. Campbell

Gregory J. Campbell

Attorney

New York Independent System Operator, Inc.

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|-----|-------------------|-----------------|
| cc: | Matt Christiansen | David Morenoff |
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¹² The NYISO's DER Filing identified a series of effective dates for distinct components of the filing. *See* DER Filing at pp. 108-111 (Section XII.E). The NYISO sought a flexible effective date for the revisions to Services Tariff Section 13.2, and expected to make the revisions effective in the fourth quarter of 2021. *Id.* at pp. 110-111. The NYISO will make a future compliance filing notifying the Commission and Market Participants of the date upon which the remaining tariff revisions identified in Section XII.E, including additional revisions in Services Tariff Section 13, will become effective.