

**UNITED STATES OF AMERICA**  
**BEFORE THE**  
**FEDERAL ENERGY REGULATORY COMMISSION**

<b>New York Independent System Operator, Inc.</b>	) ) )	<b>Docket No. ER21-2460-000</b>
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**MOTION FOR EXTENSION OF TIME TO SUBMIT  
RESPONSES TO DATA REQUEST**

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.2008 (2020), the New York Independent System Operator, Inc. (“NYISO”), respectfully requests an extension of time to respond to the letter requesting additional information issued by the Office of Energy Market Regulation (“OEMR”) on October 1, 2021 (“October 1 Order”). Under the October 1 Order, the NYISO must provide responses to the data requests within thirty days of issuance of the Order.<sup>1</sup> Through this Motion the NYISO seeks a twenty-day extension to the submission deadline, *i.e.*, until November 19, 2021, to answer the data requests contained in the October 1 Order.

**I. Motion for Extension of Time**

On July 19, 2021, the NYISO submitted tariff modifications proposed in compliance with Order No. 2222.<sup>2</sup> Comments and Protests were due on August 23, 2021, and the NYISO submitted its Answer to those Comments and Protests on September 14, 2021.<sup>3</sup>

The October 1 Order advised the NYISO that additional information was necessary to process its Compliance Filing and directed the NYISO to answer a series of inquiries related to

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<sup>1</sup> *New York Indep. Sys. Operator, Inc.*, Docket No. ER21-2460-000, at 19 (Oct. 1, 2021) (unpublished letter order).

<sup>2</sup> *New York Indep. Sys. Operator Inc.*, Compliance Filing and Request for Flexible Effective Date, Docket No. ER21-2460-000 (July 19, 2021) (“Compliance Filing”).

<sup>3</sup> *New York Indep. Sys. Operator, Inc.* Sept. 14, 2021 Answer, Docket No. ER21-2460-000.

(i) the Distributed Energy Resource (“DER”) participation model that the NYISO proposed and the Commission accepted in Docket No. ER19-2276-000, *et al.*, and (ii) its Compliance Filing. The NYISO hereby requests a twenty-day extension of time, until November 19, 2021, to respond to the October 1 Order’s inquiries. There is good cause for the Commission to approve the requested extension. The October 1 Order includes a number of detailed requests and questions concerning the NYISO’s compliance with Order No. 2222, including requests for detailed descriptions of coordination processes and procedures with New York’s distribution utilities. Compiling the necessary information and verifying a common understanding with the distribution utilities will take time and involve a number of different personnel at the NYISO. In addition, the limited requested extension will allow the NYISO to fully engage staff whose input is necessary to provide accurate and complete responses. Granting the NYISO additional time is therefore reasonable to provide it the opportunity to fully answer the Commission’s requests and provide the additional information required to evaluate the NYISO’s Order No. 2222 Compliance Filing.

The NYISO’s requested limited extension of time will not prejudice any party. The NYISO’s DER participation model, including the additional tariff revisions proposed in its Order No. 2222 Compliance Filing, remains on schedule to become effective in the fourth quarter of 2022. Because the DER tariff revisions are currently expected to become effective near the end of 2022, a brief delay in the timing of the NYISO’s response to the information requests will not harm any other party.

## II. Conclusion

For the reasons set forth above, the NYISO respectfully requests that the Commission act as expeditiously as possible to grant the NYISO's requested 20-day extension of time, until November 19, 2021, to respond to OEMR's data requests.

Respectfully Submitted,

/s/Gregory J. Campbell

Gregory J. Campbell

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October 5, 2021

cc	Janel Burdick	John C. Miller
	Matthew Christiansen	David Morenoff
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## **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 5th day of October 2021.

/s/ Joy A. Zimmerlin

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