

September 12, 2011

**Submitted Electronically**

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

Re: New York Independent System Operator, Inc.  
Compliance Filing in Docket No. ER11-3312-000.

Dear Ms. Bose:

In compliance with the Federal Energy Regulatory Commission's ("Commission's") August 19, 2011, Order ("Order") in the above-captioned proceeding,<sup>1</sup> the NYISO submits proposed revisions to its Market Monitoring Plan, which is incorporated as Section 30 of (Attachment O to) the NYISO's Market Administration and Control Area Services Tariff ("Services Tariff").<sup>2</sup>

The NYISO's April 6, 2011 filing, in the above-captioned proceeding addressed Order 719 requirements relating to the NYISO independent Market Monitoring Unit's ("MMU") disclosure obligations vis-a-vis state public service commissions ("State PUCs") and establish a framework for the exchange of Protected Information among the NYISO and its MMU, and other ISOs and RTOs and their market monitoring organizations.

In its August Order the Commission accepted the NYISO's filing with a June 5, 2011, effective date, but instructed the NYISO to submit a compliance filing revising its tariff to require that, if the Requesting Entity is a jurisdictional RTO or ISO, NYISO must also provide the requested information to that entity's market monitoring unit, as long as the Requesting Entity's market monitoring unit satisfies the confidentiality requirements and obligations accepted by the Commission in the Order.

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<sup>1</sup> *New York Indep. Sys. Operator, Inc.*, 136 FERC ¶ 61,116 (2011).

<sup>2</sup> Capitalized terms not specifically defined herein have the meaning set forth in the Services Tariff or in the NYISO's Market Monitoring Plan.

## **I. DESCRIPTION OF PROPOSED COMPLIANCE REVISIONS**

The NYISO's proposed compliance revisions address the Commission's instructions. The NYISO proposes to add the following tariff language: "If the ISO discloses Protected Information to a Requesting Entity that is a jurisdictional ISO or RTO, the ISO shall also provide the Protected Information to the Requesting Entity's market monitoring unit as soon as the Requesting Entity's market monitoring unit satisfies the requirements of Section 30.6.6.1.1, above." This tariff revision will ensure that a Requesting Entity's market monitoring unit receives the requested information, as required by the Commission.

In addition, the NYISO proposes to add two other paragraph numbers for organizational purposes. The NYISO does not propose any other changes to the language accepted by the Commission in its August 19, 2011 Order.

## **II. DOCUMENTS SUBMITTED**

The NYISO submits the following documents:

1. This filing letter; and
2. A clean version of the revisions to section 30 of the NYISO's Services Tariff ("Attachment I").
3. A black lined version of the revisions to section 30 of the NYISO's Services Tariff ("Attachment II").

## **III. SERVICE LIST**

The NYISO will send an electronic link to this filing to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, to all parties listed on the Commission's official service list in Docket No. ER11-3312-000 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](http://www.nyiso.com).

## **IV. CONCLUSION**

WHEREFORE, for the foregoing reasons, the New York Independent System Operator, Inc. respectfully requests that the Commission accept this compliance filing.

Respectfully submitted,

/s/ James H. Sweeney

Alex M. Schnell

James H. Sweeney

New York Independent System Operator, Inc.

## **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 12<sup>th</sup> day of September, 2011

*/s/ Mohsana Akter*

Mohsana Akter

Regulatory Affairs

New York Independent System Operator, Inc.

10 Krey Boulevard

Rensselaer, NY 12114

(518) 356-7560