

April 27, 2010

By Hand Delivery

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

**Re: *New York Independent System Operator, Inc.*, Errata to March 31, 2010 Filing
in Docket No. ER10-982-000**

Dear Secretary Bose:

On March 31, 2010, the New York Independent System Operator, Inc. (“NYISO”) submitted proposed tariff revisions to its Market Administration and Control Area Services Tariff (“Services Tariff”) and to its Open Access Transmission Tariff (“OATT”) to revise provisions related to its Transmission Congestion Contract (“TCC”) market (“March 31 Filing”). On April 2, 2010 the NYISO submitted proposed tariff revisions to its Services Tariff and OATT to improve parts of the TCC Auction process in Docket No. ER10-1005-000 (“April 2 Filing”). On April 16, 2010 the NYISO made Errata filings in both these dockets.

In this current errata filing, the NYISO is proposing four additional ministerial formatting changes. First, it has come to the NYISO’s attention that in the March 31 Filing, the footer on Sheet No. 583 of the OATT was not properly updated. The NYISO is resubmitting Sheet No. 583 of the OATT with the proper changes to the footer. As the April 2 Filing also amended Sheet No. 583 of the OATT, the NYISO is making a concurrent errata filing in Docket No. ER10-1005-000 to resubmit Sheet No. 583 of the OATT with the proper footer.

Second, the NYISO is submitting a replacement Sheet No. 589 of the OATT with this filing because the header on that sheet was not properly updated.

Finally, NYISO is proposing amendments to Sheets Nos. 574E and 576 of the OATT, submitted in the errata filing made on April 16, 2010, as their base sheets were out-of-date. The base pages used did not include amendments proposed in the April 2 Filing. The NYISO is re-submitting the errata changes on Sheet Nos. 574E and 576 on the correct base pages.

Clean versions of the above described errata sheets are submitted as Attachment I. Redlined Versions of the same are attached hereto as Attachment II.

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The NYISO respectfully requests that the Commission accept these amendments to its March 31, 2010 filing and its April 16, 2010 errata filing as containing ministerial formatting corrections. Because these are only ministerial changes, the NYISO further requests that the Commission waive the 60-day notice period and accept the attached sheets for filing with a May 31, 2010 effective date, as requested in the original March 31, 2010 filing. The Commission has discretion to shorten the sixty day prior notice period and make tariff revisions effective before it closes when “good cause” is shown.¹ The NYISO believes a May 31, 2010 effective date remains appropriate because of the minor nature of these proposed changes. As well, the NYISO wishes to include these changes in NYISO’s eTariff baseline filing due June 2, 2010² and a delay in the effective date will preclude this opportunity. While the proposed changes do not alter the substance of this filing in any manner, the NYISO has also noticed its Market Participants to this filing in the same manner it provided notice of the original filing.

Respectfully submitted,

/s/ Kristin A. Bluvas

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¹ See e.g., *California Independent System Operator Corp.*, 113 FERC ¶61, 287 at PP 48-50 (2005).

² See e.g., Notice of Date for Submission of Transitional eTariff Baseline Schedules, *New York Indep. Sys. Operator Inc.*, Docket No. RM01-5-000 (December 21, 2009).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service lists 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, New York this 27th day of April, 2010.

/s/ Kristin A Bluvas
Kristin A. Bluvas
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Attachment I

The ISO shall apply this methodology as follows:

- (i) first, on the Table 1 ETCNL/TCCs (prior to the conversion of any ETCNL to ETCNL TCCs), and
- (ii) second, on the Table 1 ETCNL/TCCs remaining after conversion into ETCNL TCCs of ETCNL included in such Table 1 ETCNL/TCCs.

For purpose of the second reduction, a holder of ETCNL may elect to disaggregate the ETCNL in accordance with ISO Procedures prior to conducting the reduction process. If a TO elects to have its ETCNL disaggregated, the number of MW of ETCNL allocated to that TO specifying each Load Zone as its POW shall be replaced by the same number of MW of ETCNL, specifying the same POI as the original ETCNL, but specifying various buses within that Load Zone as the POWs, as determined in accordance with ISO Procedures.

To the extent more than one model is used in a given Centralized TCC Auction (*e.g.* to reflect different summer / winter ratings), the ISO shall retest the Table 1 ETCNL/TCCs remaining after reduction so as to avoid reducing the Table 1 ETCNL/TCCs more than is necessary to prevent infeasibility in a given Sub-Auction. However, any Table 1 ETCNL/TCC that is deemed infeasible in one Centralized TCC Auction may be deemed reduced and not eligible for retesting in a subsequent Centralized TCC Auction.

The Centralized TCC Auction will consist of a series of Sub-Auctions, which will be conducted consecutively. In each Sub-Auction, TCCs of a single duration will be available (*e.g.*, only TCCs with a five-year duration might be available in one Sub-Auction). Sub-Auctions will be conducted in decreasing order of the length of the period for which TCCs sold in the Sub-Auction are valid. Therefore, if the ISO were to determine that five years would be the maximum length of TCCs available in the Centralized TCC Auction, then the Sub-Auction for TCCs with a duration of five years would be held first. All TCCs sold in the 5-year TCC Sub-Auction (other than those offered for sale in the next Sub-Auction, as described in Section 9.1) would then be modeled as fixed injections and withdrawals in the next Sub-Auction, in which TCCs of the next longest duration, as determined by the ISO (*e.g.*, four years), would be available for purchase. Following that Sub-Auction, TCCs sold in either of the first two Sub-Auctions (other than those offered for sale in the next Sub-Auction) would then be modeled as fixed injections and withdrawals in the third Sub-Auction (*e.g.*, a Sub-Auction for TCCs with a duration of three years), etc.

may offer TCCs for sale in Stage 1 provided however that the sale of TCCs in a Stage 1 Auction shall be subject to the limitations and prohibitions set forth in this ISO OATT including the limitation on the sale or transfer of Fixed Price TCCs and the limitation on the sale or other transfer of Incremental TCCs. If a Primary Holder wishes to offer TCCs for sale, it must specify all of the TCCs it wishes to offer in Stage 1 before Stage 1 begins.

TCCs purchased in any sub-auction may be resold in a subsequent sub-auction. For example, the purchaser of a 5-year TCC purchased in the 5 year sub-auction may release a 4-year TCC with the same Point of Injections and Point of Withdrawal for sale in the 4-year sub-auction. Similarly, that purchaser could instead release a corresponding 3-year TCC for sale in the 3-year sub-auction.

The following holders of TCCs may offer to sell TCCs in the round of Stage 2: (i) Primary Holders who did not sell those TCCs in a Direct Sale or in a previous round of the Centralized TCC Auction (in either Stage 1 or Stage 2); (ii) purchasers of TCCs in previous rounds of that Centralized TCC Auction or in previous Auctions who have not subsequently sold those TCCs through an Auction; and (iii) purchasers of TCCs through a Direct Sale who qualify to become Primary Holders and have not already sold those TCCs through an Auction or through a Direct Sale, provided however that the sale of TCCs in a Stage 2 Auction shall be subject to the limitations and prohibitions set forth in this ISO OATT including the limitation on the sale or transfer of Fixed Price TCCs and the limitation on the sale or other transfer of Incremental TCCs. .

9.4 Responsibilities of each Bidder

To qualify to submit Bids and offers in a Centralized TCC Auction, a party shall register as a Customer or Transmission Customer and shall otherwise comply with all applicable registration requirements established in ISO Procedures. All Customers and Transmission Customers seeking to submit Bids and Offers in a Centralized TCC Auction shall comply with all applicable credit requirements as set forth in Attachment K of the Services tariff.

Each bidder shall submit Bids to purchase and sell TCCs into the Centralized TCC Auction in accordance with this Attachment M and ISO Procedures. Each bidder shall submit the following information with its Bids to purchase TCCs: (i) the number of TCCs for which an offer to purchase is made, (ii) the Bid Price (in \$/TCC) which represents the maximum amount the bidder is willing to pay for the TCC (Bid Prices may be negative, indicating that a bidder would have to be paid in order to accept a TCC); (iii) the location of the Point of Injection and the Point of Withdrawal for the TCC to which the Bid applies (these locations may be any locations for which the ISO calculates an LBMP and which is otherwise available as a TCC POI or POW)); and (iv) if the Auction is a Centralized TCC Auction, the duration in multiples of Capability Periods of the TCC for which the bidder is bidding. Additionally, if the ISO offers TCCs for sale that are valid in sub-periods (e.g., on-peak or off-peak TCCs), this information must also be provided by the Bidder.

Each bidder must submit such information to the ISO regarding the bidder's or LSE's creditworthiness as the ISO may require, along with a statement signed by the bidder, or LSE

Attachment II

The ISO shall apply this methodology as follows:

- (i) first, on the Table 1 ETCNL/TCCs (prior to the conversion of any ETCNL to ETCNL TCCs), and
- (ii) second, on the Table 1 ETCNL/TCCs remaining after conversion into ETCNL TCCs of ETCNL included in such ~~Table 1~~ Table 1 ETCNL/TCCs.

For purpose of the second reduction, a holder of ETCNL may elect to disaggregate the ETCNL in accordance with ISO Procedures prior to conducting the reduction process. If a TO elects to have its ETCNL disaggregated, the number of MW of ETCNL allocated to that TO specifying each Load Zone as its POW shall be replaced by the same number of MW of ETCNL, specifying the same POI as the original ETCNL, but specifying various buses within that Load Zone as the POWs, as determined in accordance with ISO Procedures.

To the extent more than one model is used in a given Centralized TCC Auction (*e.g.* to reflect different summer / winter ratings), the ISO shall retest the Table 1 ETCNL/TCCs remaining after reduction so as to avoid reducing the Table 1 ETCNL/TCCs more than is necessary to prevent infeasibility in a given Sub-Auction. However, any Table 1 ETCNL/TCC that is deemed infeasible in one Centralized TCC Auction may be deemed reduced and not eligible for retesting in a subsequent Centralized TCC Auction.

The ~~Initial~~ Centralized TCC Auction will consist of a series of Sub-Auctions, which will be conducted consecutively. In each Sub-Auction, TCCs of a single duration will be available (*e.g.*, only TCCs with a five-year duration might be available in one Sub-Auction). Sub-Auctions will be conducted in decreasing order of the length of the period for which TCCs sold in the Sub-Auction are valid. Therefore, if the ISO were to determine that five years would be the maximum length of TCCs available in the Centralized TCC Auction, then the Sub-Auction for TCCs with a duration of five years would be held first. All TCCs sold in the 5-year TCC Sub-Auction (other than those offered for sale in the next Sub-Auction, as described in Section 9.1) would then be modeled as fixed injections and withdrawals in the next Sub-Auction, in which TCCs of the next longest duration, as determined by the ISO (*e.g.*, four years), would be available for purchase. Following that Sub-Auction, TCCs sold in either of the first two Sub-Auctions (other than those offered for sale in the next Sub-Auction) would then be modeled as fixed injections and withdrawals in the third Sub-Auction (*e.g.*, a Sub-Auction for TCCs with a duration of three years), etc.

may offer TCCs for sale in Stage 1 provided however that the sale of TCCs in a Stage 1 Auction shall be subject to the limitations and prohibitions set forth in this ISO OATT including the limitation on the sale or transfer of Fixed Price TCCs and the limitation on the sale or other transfer of Incremental TCCs ~~TCCs for sale in Stage 1~~. If ~~they do so~~ a Primary Holder wishes to offer TCCs for sale, ~~it~~ they must specify all of the TCCs ~~they~~ it wishes to offer in Stage 1 before Stage 1 begins.

TCCs purchased in any sub-auction may be resold in a subsequent sub-auction. For example, the purchaser of a 5-year TCC purchased in the 5 year sub-auction may release a 4-year TCC with the same Point of Injections and Point of Withdrawal for sale in the 4-year sub-auction. Similarly, that purchaser could instead release a corresponding 3-year TCC for sale in the 3-year sub-auction.

The following holders of TCCs may offer to sell TCCs in ~~the each~~ round of Stage 2: (i) Primary ~~Owners~~ Owners-Holders who did not sell those TCCs in a Direct Sale or in a previous round of the Centralized TCC Auction (in either Stage 1 or Stage 2); (ii) purchasers of TCCs in previous rounds of that Centralized TCC Auction or in previous Auctions who have not subsequently sold those TCCs through an Auction; and (iii) purchasers of TCCs through a Direct Sale who qualify to become Primary Holders and have not already sold those TCCs through an Auction or through a Direct Sale, provided however that the sale of TCCs in a Stage 2 Auction shall be subject to the limitations and prohibitions set forth in this ISO OATT including the limitation on the sale or transfer of Fixed Price TCCs and the limitation on the sale or other transfer of Incremental TCCs.

9.4 Responsibilities of each Bidder

To qualify to submit Bids and offers in a Centralized TCC Auction, a party shall register as a Customer or Transmission Customer and shall otherwise comply with all applicable registration requirements established in ISO Procedures. All Customers and Transmission Customers seeking to submit Bids and Offers in a Centralized TCC Auction shall comply with all applicable credit requirements as set forth in Attachment K of the Services tariff.

Each bidder shall submit Bids to purchase and sell TCCs into the Centralized TCC Auction in accordance with this Attachment M and ISO Procedures. Each bidder shall submit the following information with its Bids to purchase TCCs: (i) the number of TCCs for which an offer to purchase is made, (ii) the Bid Price (in \$/TCC) which represents the maximum amount the bidder is willing to pay for the TCC (Bid Prices may be negative, indicating that a bidder would have to be paid in order to accept a TCC); (iii) the location of the Point of Injection and the Point of Withdrawal for the TCC to which the Bid applies (these locations may be any locations for which the ISO calculates an LBMP and which is otherwise available as a TCC POI or POW); ~~and~~ (iv) if the Auction is a Centralized TCC ~~n-Initial~~ Auction, the duration in multiples of Capability Periods of the TCC for which the bidder is bidding; ~~and (v) if the Auction is an End-State Auction, the points in time at which the TCC bid upon begins to be valid (which must be the beginning of a Capability Period) and at which the TCC bid upon ceases to be valid (which must be the end of a Capability Period, and which may not extend beyond the last point in time for which TCCs will be available in that Auction).~~ Additionally, if the ISO offers TCCs for sale that are valid in sub-periods (e.g., on-peak or off-peak TCCs), this information must also be provided by the Bidder.

Each bidder must submit such information to the ISO regarding the bidder's or LSE's creditworthiness as the ISO may require, along with a statement signed by the bidder, or LSE

Issued by: ~~Mark S. Lynch~~Stephen G. Whitley, President

Effective: ~~December~~May 31, 20072010

Issued on: ~~February 5, 2007~~March 31, 2010

~~Filed to comply with Order No. 681 of the Federal Energy Regulatory Commission, Docket No. RM06-8-000, issued July 20, 2006, 116 FERC ¶ 61,077 (2006) and Order No. 681-A, Docket No. RM06-8-001, issued November 16, 2006, 117 FERC ¶ 61,201 (2006).~~