

August 10, 2010

**By Electronic Filing**

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

**Re: *New York Independent System Operator, Inc.*, Docket No. ER10-1977-000  
Errata Filing**

Dear Secretary Bose:

On July 26, 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 Open Access Transmission Tariff (OATT) introducing clarifications regarding Real-Time Energy Offers (“July 26 Filing”)<sup>1</sup>. The NYISO previously made a filing on July 21, 2010 (“July 21 Filing”), concerning some of the same tariff sections, in Docket No. ER10-1866-000.

In an errata to the July 21 Filing, which is being made concurrently with this filing, the NYISO is proposing a few minor corrections to proposed amendments to Section 18 of the Services Tariff. Because these filings were made within a few days of each other, and proposed changes to the same tariff section, the errata to the July 21 Filing implicates the base sheets submitted with the July 26 Filing. Therefore, the NYISO is submitting this filing to reflect accurate base pages in this docket. No substantive changes are being proposed for this docket. The NYISO is only seeking to reflect an accurate record by correcting the base pages used for the tariff changes proposed for this docket.

**Effective Date**

The NYISO respectfully requests that the Commission accept this errata to its July 26 Filing and accept the attached sheets for filing with the same effective date as the Commission assigns to the tariff revisions that the NYISO submitted on July 26, 2010. Although the requested effective date of September 30, 2010 is one week short of the sixty-day-prior notice period, the NYISO submits that a September 30, 2010 effective date remains appropriate because no substantive changes are being proposed and this filing is being made solely to reflect an accurate record. The Commission has discretion to waive the sixty day prior notice period and make tariff revisions effective before it closes when “good cause” is shown.<sup>2</sup> Good cause for

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<sup>1</sup> On July 30, 2010 the NYISO also filed an errata under this docket correcting a few ministerial errors.

<sup>2</sup> See e.g., *California Independent System Operator Corp.*, 113 FERC ¶61, 287 at PP 48-50 (2005).

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such a waiver exists in this proceeding because the software implementing these tariff revisions is interrelated and tied together in one deployment scheduled for September 30, 2010. It would be impossible for the NYISO to separate out portions of the software tied to tariff language that was assigned a different effective date. In addition, the ministerial changes proposed herein are consistent with the changes previously approved by NYISO stakeholders. The NYISO has also notified its Market Participants to this filing in the same manner it provided notice of the original filing.

### **Service**

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, and to the electric utility regulatory agency of New Jersey. In addition, the complete filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com). This is in accordance with 18 C.F.R. 35.2(e).

### **Communications and Correspondence**

All Communications and service in this proceeding should be directed to:

Robert E. Fernandez, General Counsel  
Elaine D. Robinson, Director of Regulatory Affairs  
\* Mollie Lampi, Assistant General Counsel  
10 Krey Boulevard  
Rensselaer, NY 12144  
Tel: (518) 356-7530  
Fax: (518) 356-7678

\* Persons designated for receipt of service.

Respectfully submitted,

/s/ Mollie Lampi  
Mollie Lampi  
Assistant General Counsel  
New York Independent System Operator, Inc.  
10 Krey Blvd.  
Rensselaer, New York 12144  
(518) 356 7530  
[mlampi@nyiso.com](mailto:mlampi@nyiso.com)