

March 9, 2011

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

RE: New York Independent System Operator, Inc. Request for Temporary Waiver to Permit Delayed Implementation of Proposed Tariff Rules; Docket No. ER11-2547-000

Dear Secretary Bose:

On December 28, 2010, the New York Independent System Operator, Inc. (“NYISO”) proposed revisions to its Market Administration and Control Area Services Tariff and Open Access Transmission Tariff to allow the NYISO to implement more frequent transaction scheduling (Enhanced Interface Transaction Coordination or “EITC”) at the borders of the New York Control Area (“NYCA”).

This filing is currently pending before the Commission, in this docket, with a requested effective date of March 15, 2011. As explained in its December 28, 2010 filing letter, the NYISO intends to implement EITC’s new scheduling and pricing rules on an interface-by-interface basis starting with the Hydro-Quebec/Chateauguay interface. At the time of the filing, the NYISO expected that this implementation would follow soon after the March requested effective date.

However, the NYISO has recently determined that additional testing of the new software designed to implement EITC functionality will be necessary, and therefore requests that the Commission delay the requested effective date of the tariff amendments beyond March 15, 2011. The NYISO expects to complete the work needed to verify the software’s functionality no later than May 10, 2011 and possibly as early as April 26, 2011. Thus, the NYISO will be ready to implement EITC functionality between those dates.

The NYISO respectfully requests that the Commission accept the tariff revisions proposed in this docket and temporarily waive its obligation to implement such rules until the earlier of May 10, 2011 or the date by which the NYISO informs the Commission that it is prepared to implement EITC. The NYISO would inform the Commission and its Market Participants two weeks prior to the implementation date, consistent with the notice commitment the NYISO made in its December 28 filing letter.

Honorable Kimberly D. Bose
Federal Energy Regulatory Commission
March 9, 2011
Page 2

In addition, the NYISO is seeking, under separate cover, a delay in the effective date of its tariff revisions and new software concerning enhanced shortage pricing for Regulation Service and Operating Reserves. Accepted by the Commission on February 4, 2011 in ER11-2454-000, these tariff revisions were also expected to become effective March 15, 2011. However, the software to implement enhanced shortage pricing is functionally integrated with the EITC software. As a consequence, the implementation of these shortage pricing rules will also need to be delayed. Because the Commission has already accepted these tariff revisions, the NYISO is separately filing a Motion to Delay the Effective Date in ER11-2454-000 and is seeking the same revised effective date as it proposes herein.

The NYISO apologizes for the lateness of this filing. The concerns that gave rise to the need for this delay were only recently discovered as part of the NYISO's quality assurance testing and are being addressed as quickly as possible.

Yours truly,

/s/Mollie Lampi
Mollie Lampi
Assistant General Counsel

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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 9th day of March, 2011.

/s/ Joy Kimberlin

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