

June 20, 2023

**By Electronic Delivery**

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

Re: New York Independent System Operator, Inc., Compliance Filing, Docket No.  
ER22-2350-00\_

Dear Ms. Bose:

In accordance with the Federal Energy Regulatory Commission's ("Commission's") April 20, 2023 *Order on Compliance Filing* ("2023 Order on Compliance"),<sup>1</sup> the New York Independent System Operator, Inc. ("NYISO") hereby submits this compliance filing proposing revisions to Sections 39.1.2, 39.2.2, and 39.4.2 of Attachment GG to the NYISO's Open Access Transmission Tariff ("OATT") ("2023 Compliance Filing").<sup>2</sup> The tariff revisions proposed herein follow the Commission's directives to: (i) modify the definition of "Seasonal Facility Rating"<sup>3</sup> in OATT Section 39.1.2; and (ii) require the NYISO to respond to requests for line ratings information.<sup>4</sup> In addition, the NYISO proposes certain non-substantive modifications to account for section renumbering associated with the revisions described herein.

As directed by the 2023 Order on Compliance, NYISO will submit a further compliance filing on or before November 12, 2024 ("2024 Compliance Filing").<sup>5</sup>

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<sup>1</sup> *New York Indep. Sys. Operator, Inc.*, Order on Compliance Filing, 183 FERC ¶ 61,036 (April 20, 2023).

<sup>2</sup> Capitalized terms that are not otherwise defined in this submission shall have the meaning specified in Section 1 or Section 39 of the NYISO's OATT.

<sup>3</sup> 2023 Order on Compliance at P 37.

<sup>4</sup> *Id.* at P 47.

<sup>5</sup> *Id.* at P 26.

## **I. Communications**

Communications and correspondence regarding this filing should be directed to:

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## **II. List of Documents Submitted**

The NYISO submits the following documents with this filing letter:

1. A blacklined version of NYISO OATT Section 39 (Attachment GG) containing the proposed compliance modifications (“Attachment I”); and
2. A clean version of NYISO OATT Section 39 (Attachment GG) containing the proposed compliance modifications (“Attachment II”).

## **III. Background**

On July 12, 2022, the NYISO submitted its Order No. 881<sup>6</sup> compliance filing (the “2022 Compliance Filing”).<sup>7</sup> Relevant here, the 2022 Compliance Filing proposed to add Attachment GG (Section 39) to the NYISO’s OATT in response to the directives of Order No. 881, with certain independent entity variations. The proposed variations largely conformed the revisions directed by Order No. 881 to the NYISO’s financial reservation transmission model, as well as

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<sup>6</sup> *Managing Transmission Line Ratings*, Order No. 881, 87 Fed. Reg. 2244 (January 13, 2022), 177 FERC ¶ 61,179 (2021) (“Order No. 881”), *Order Addressing Arguments Raised on Rehearing and Clarification*, Order No. 881-A, 179 FERC ¶ 61,125 (2022) (“Order No. 881-A”).

<sup>7</sup> *New York Indep. Sys. Operator, Inc.*, Compliance Filing, Docket No. ER22-2350-000 (July 12, 2022).

other procedures and terminology of the NYISO OATT, previously accepted by the Commission.

In its 2023 Order on Compliance, the Commission accepted the 2022 Compliance Filing in part and directed that the NYISO submit two further compliance filings. This 2023 Compliance Filing, the first of the compliance filings directed by the 2023 Order on Compliance, proposes revisions to Attachment GG of the OATT to: (1) specify that seasons for Seasonal Facility Rating purposes will be defined to include no fewer than four seasons and to reasonably reflect portions of the year where expected high temperatures are relatively consistent, and (2) provide that the NYISO will be responsible for responding to requests for line ratings information.

#### **IV. Proposed Tariff Revisions**

The NYISO proposes the following tariff revisions consistent with the 2023 Order on Compliance.

##### **A. Definition of Seasonal Facility Rating**

The 2023 Order on Compliance reiterated the Commission's Order No. 881 requirement that transmission providers define seasons to include no fewer than four seasons and directed the NYISO to define "Seasonal Facility Rating" to specify these requirements.<sup>8</sup> The 2022 Compliance Filing had proposed a definition of "Seasonal Facility Rating" that did not expressly define seasons to include no fewer than four seasons in each year. Consistent with the 2023 Order on Compliance, the NYISO proposes to modify the definition of "Seasonal Facility Rating" by incorporating the additional specifications directed by the Commission, as shown below. This additional text will obligate the NYISO and the Transmission Owners to utilize no fewer than four seasons each year. The portion of the year assigned to each season will be described in ISO Procedures such that each season captures a portion of the year where expected high temperatures are relatively consistent.<sup>9</sup> In compliance with the 2023 Order on Compliance, the NYISO proposes to the following, revised definition:

**Seasonal Facility Rating:** A Transmission Facility Rating that:

- (a) Applies to a specified season, as described in ISO Procedures, where seasons are determined by the ISO and Transmission Owners to include not fewer than four seasons in each year, and to reasonably reflect portions of the year where expected high temperatures are relatively consistent ....

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<sup>8</sup> See 2023 Order on Compliance at P. 37.

<sup>9</sup> The NYISO intends to coordinate with the Transmission Owners to develop a uniform set of seasons that will apply to the entire New York Control Area.

**B. Obligation to Share Transmission Facility Ratings**

The 2023 Order on Compliance reiterated the Commission's Order No. 881 requirement that transmission providers share Transmission Facility Ratings and Transmission Facility Rating methodologies with other transmission providers upon request.<sup>10</sup> The 2022 Compliance Filing proposed to obligate each Transmission Owner, as opposed to the NYISO, to share Transmission Facility Ratings and Transmission Facility Rating methodologies upon request by another Transmission Owner, the NYISO or a transmission provider other than the NYISO. Consistent with the 2023 Order on Compliance, the NYISO proposes to modify this data sharing obligation such that the NYISO will be required to share the information described below with other transmission providers, upon request.

In compliance with the Commission's directive in the 2023 Order on Compliance,<sup>11</sup> the NYISO proposes to modify Section 39.2.2 of Attachment GG to the OATT, delete Section 39.4.2 of Attachment GG to the OATT, and to renumber the remainder of Section 39.4 of Attachment GG to the OATT accordingly.<sup>12</sup> The NYISO proposes the following addition to OATT Section 39.2.2 consistent with the Commission's directive in the 2023 Order on Compliance:

The ISO shall share in a timely manner, upon request by a transmission provider, the following information:

(a) Transmission Facility Ratings for each period for which Transmission Facility Ratings are calculated and provided to the ISO, including any updated Transmission Facility Ratings that are calculated and provided to the ISO, and

(b) written Transmission Facility Rating methodologies used by the Transmission Owners to calculate the Transmission Facility Ratings in (a) above and provided to the ISO.

**V. Effective Date**

Consistent with Order No. 881<sup>13</sup> and the NYISO's 2022 Compliance Filing, the NYISO continues to assess the implementation timeline for these changes and endeavors to implement the tariff revisions proposed herein by July 12, 2025.<sup>14</sup>

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<sup>10</sup> See 2023 Order on Compliance at P. 46.

<sup>11</sup> *Id.* at P 47.

<sup>12</sup> The NYISO also proposes to update certain cross references contained within Attachment GG to account for such renumbering.

<sup>13</sup> See Order No. 881 at P 361. *See also*, 2023 Order on Compliance at P 8.

<sup>14</sup> See 2022 Compliance Filing at pp. 18-19.

## **VI. Service**

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, the New York State Public Service Commission, and the New Jersey Board of Public Utilities. In addition, a complete copy of this filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com), and the NYISO will send an electronic link to this filing to the official representative of each of its customers and to each participant on its stakeholder committees.

## **VII. Conclusion**

The NYISO respectfully requests that the Commission accept this compliance filing without modification.

Respectfully submitted,

/s/ James H. Sweeney

James H. Sweeney

Counsel for the New York Independent System  
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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 20th day of June 2023.

/s/ Elizabeth Rilling

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