

Attachment I

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

New York Independent System Operator, Inc.)	
)	Docket Nos.
)	ER23-2040-000
)	ER23-2040-002
)	

AFFIDAVIT OF ROBERT PIKE

1. My name is Robert Pike. I am currently the Vice President of Market Operations for the New York Independent System Operator, Inc. (“NYISO”). My business address is 10 Krey Boulevard, Rensselaer, NY 12144. I received a Bachelor of Science in Electrical Engineering degree and a Master of Science in Electrical Engineering degree from Clarkson University, and a Master of Business Administration from Union College.
2. I have been involved in the design and operation of wholesale electricity markets at the NYISO for over 20 years. Prior to the NYISO, I worked for the New York Power Pool. In September 2019 I was promoted to Vice President from my previous position of Director, Market Design and Product Management, where I led numerous projects to address changes and enhancements in the NYISO’s Capacity, Energy, and Ancillary Services markets. Prior to my position as Director, I held various roles of increasing responsibility at the NYISO in Planning, Operations, Market Operations, and Information Technology.
3. As the NYISO’s Vice President of Market Operations, I am responsible for maintaining reliable administration of the NYISO’s Energy, Ancillary Services, and Installed Capacity markets. My areas of responsibility include the NYISO’s Installed Capacity auctions; analysis of operational data to support resource adequacy studies and capacity accreditation; implementation of the NYISO’s market designs and tariffs; facilitating NYISO’s Demand Response programs and guiding the development of the Distributed Energy Resource (“DER”)

and Aggregation participation model; and achieving compliance with applicable reliability rules, the ISO Tariffs, Federal Energy Regulatory Commission (“Commission”) orders, and any applicable New York Public Service Commission orders or requirements.

4. The purpose of this Affidavit is to confirm the facts set forth in the NYISO’s response to the deficiency letter issued on December 15, 2023, by the Commission’s Office of Energy Market Regulation (“OEMR”), including (i) the necessity of the NYISO’s proposed 10 kW minimum capability requirement for DER, (ii) the implementation status of the NYISO’s DER and Aggregation participation model, and (iii) the impact of the Commission rejecting the June 1, 2023 Federal Power Act Section 205 filing in this proceeding (“June 1 Filing”).
5. In my previous capacity as Director of Market Design and Product Management from 2010 through 2019, I oversaw the NYISO’s development of its DER and Aggregation market rules that were filed on June 27, 2019, and accepted by the Commission on January 23, 2020, in Docket No. ER19-2276-000, *et al. New York Indep. Sys. Operator, Inc.*, Order Accepting Tariff Revisions and Directing Compliance Filing and Informational Report, 170 FERC ¶ 61,0333 (2020). I also oversaw the NYISO staff responsible for research and development of the functional requirements and software needed to implement the accepted DER and Aggregation market rules, including management of the interdepartmental project efforts to achieve consensus on the participation model. In my current capacity as Vice President of Market Operations, I oversaw the NYISO’s examination of the potential modeling, market system and administrative/staffing consequences of allowing immediate participation by small DER (less than 10 kW of capability, including resources as small as 1 kW), including the anticipated process impacts across several departments responsible for ongoing market operations and analyses. I also

oversaw the NYISO's development of its Order No. 2222¹ compliance filing that was submitted on July 19, 2021.

6. Members of my staff who focus on operating the NYISO's four demand response programs, and who will be primarily responsible for administering the NYISO's DER and Aggregation participation model, worked with the NYISO's New Resource Integration Department to develop the market rule enhancements proposed in the June 1 Filing. Members of my staff identified concerns related to the administrative challenges of (i) enrolling hundreds or thousands of individual DER while maintaining compliance with existing market rules, and (ii) ongoing management and oversight of Aggregations containing sub-10 kW resources (e.g., performance validation, confirmation of Aggregation enrollment data, and modifications to Aggregation composition), and participated in developing proposals to address those concerns. As described below, the identification of a minimum capability requirement will enable NYISO staff to efficiently manage the initial launch of its DER and Aggregation participation model consistent with the NYISO's accepted and pending market rules. Any modification to the proposed 10 kW individual DER minimum capability requirement would require the NYISO to reevaluate its DER and Aggregation market design, which will require a significant, multi-year process.
7. In determining that a 10 kW minimum capability requirement was necessary to effectuate the DER and Aggregation rules, my staff, along with other NYISO employees, identified that several manual processing enhancements, staff resourcing increases, and

¹ *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order No. 2222, 172 FERC 61,247 (Sep. 17, 2020), 85 Fed. Reg. 70,143 (Nov. 4, 2020) ("Order No. 2222"); Order No. 2222-A, 174 FERC ¶ 61,197 (Mar. 18, 2021); Order No. 2222-B, 175 FERC ¶ 61,227 (Jun. 17, 2021).

computational and software modifications would be necessary to integrate DER smaller than 10 kW in the NYISO-administered Energy, Ancillary Services and Installed Capacity markets.

8. Rejection of the proposed 10 kW minimum capability requirement proposed in this docket will result in a multi-year delay to DER and Aggregation participation in the NYISO-administered markets. If the Commission rejects the June 1 Filing, the NYISO will need to re-evaluate its DER and Aggregation participation model and modify that model with a new set of market rules applicable to sub-10 kW DER. Any new market rules will be developed through the NYISO's shared governance process, and I expect there will be modifications to NYISO oversight of small facilities, and changes to Aggregation composition requirements, among others.
9. In determining how to address its concerns related to administration of its DER and Aggregation participation model, the NYISO considered the fact that sub-10 kW resources may currently participate in the NYISO's Special Case Resource and Emergency Demand Response Programs, as well as in utility demand response programs and Value of DER programs. These other participation opportunities for small facilities are not impacted by the 10 kW minimum capability requirement proposed in this docket.
10. Regarding the NYISO's filings in this proceeding, I provided guidance on the market operational enhancements that would be required in order to incorporate DER with capability smaller than 10 kW into the NYISO's DER and Aggregation market design. I support the proposed minimum capability requirement and advise that further deliberation with the NYISO stakeholder community would be necessary to develop a suitable market design and establish efficient administration and program oversight expectations, to allow

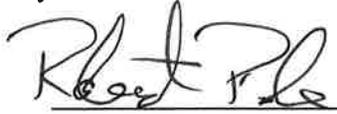
for potential use cases of DER smaller than 10 kW. The NYISO's stakeholder process is fundamental to NYISO's tariff and manual procedures and requires an appropriate amount of time to revise the NYISO's tariff and procedures and discuss such proposals with the stakeholder community.

11. My staff and I have supported an ongoing and collaborative effort with the Joint Utilities of New York to document interactive processes between distribution utilities and the NYISO. Such processes have resulted in several points of interface between NYISO and utilities in preparation for the implementation of the DER and Aggregation participation model to support a) reliability and safety reviews of individual DER during enrollment, b) exchange of outage scheduling and anticipated operational plans among the NYISO, utilities, and Aggregators, and c) coordination regarding dual participating resources to address system needs. To support the aforementioned processes for DER smaller than 10 kW, the NYISO would require additional time to collaborate with its distribution utility counterparts to understand the scope of impacts, and to discuss process enhancements with Aggregators accordingly.
12. I support and helped develop NYISO's description of the challenges and potential solutions to the integration of DER with less than 10 kW of capability provided throughout this proceeding, as well as the impact of Commission rejection of the June 1 Filing to DER and Aggregation integration in the NYISO-administered markets as a whole.
13. I have reviewed the facts stated in the NYISO's response to OEMR's December 15, 2023 deficiency letter, and I have personal knowledge of and helped develop the factual statements contained in the NYISO's response. The factual statements set forth in the

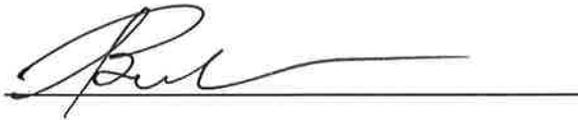
NYISO's response are true and correct to the best of my information, knowledge, and belief.

14. This concludes my affidavit.

Executed on this 12th day of February 2024.



Robert Pike
Vice President, Market Operations
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, New York 12144



Notary Public, State of New York

My Commission Expires: October 7, 2026

BRADFORD C. MULDER
Notary Public, State of New York
No. 02MU5067057
Qualified in Kings County
Certificate Filed in New York County
Commission Expires Oct. 7, 2026