

May 23, 2025

Submitted Electronically

Honorable Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, D.C. 20426

**Re: Docket No. ER25-1462-00__, *New York Independent System Operator, Inc.*;
Notice of Management Committee Concurrence Pursuant to Section 19.01 of
the ISO Agreement**

Dear Secretary Reese:

On February 28, 2025, the New York Independent System Operator, Inc. (“NYISO”) submitted tariff revisions to its Open Access Transmission Tariff (“OATT”) and Market Administration and Control Area Services Tariff (“Services Tariff”) to govern its collection and allocation of any costs related to the potential imposition of duties on electrical energy imports from Canada.¹ The tariff revisions also authorized the NYISO to make any necessary adjustments to its customer credit requirements to address ad valorem rate of import duty-related costs.² The NYISO asked the Commission to accept the revisions under Section 206 of the Federal Power Act or, in the alternative, under the NYISO’s “exigent circumstances” Section 205 authority in accordance with Section 19.01 of the Independent System Operator Agreement (“ISO Agreement”).³

On April 14, 2025, the Commission issued an order conditionally accepting the tariff revisions as a Section 205 exigent circumstances filing and made them effective as of March 1,

¹ *New York Indep. Sys. Operator, Inc.*, Proposed Tariff Revisions Under Section 206 of the Federal Power Act Regarding the Recovery and Allocation of Costs that Might Be Imposed Under the President’s February 1 Executive Order “Imposing Duties to Address the Flow of Illicit Drugs Across Our Northern Border,” Alternative Request for Action Under Exigent Circumstances Section 205 Filing Authority, Request for Shortened Notice and Comment Period, Request for Immediate Refund Effective Date and Effective Date, and Request for Expedited Commission Action, Docket Nos. EL25-62-000 and ER25-1462-000 (filed Feb. 28, 2025) (“February 28 Filing”).

² *Id.* at 1.

³ *Id.* at 2-3.

2025.⁴ The NYISO submitted a compliance filing on April 22, 2025,⁵ which is pending before the Commission.

I. Notice of Management Committee Concurrence

As the NYISO indicated in its February 28 Filing, Section 19.01 of the ISO Agreement requires that tariff revisions submitted via exigent circumstances authority expire within 120 days from the date of filing unless the changes are ratified by the Management Committee or subsequently approved by the Commission under the “just and reasonable” standard of Section 206 of the Federal Power Act.

The NYISO respectfully notifies the Commission that, on April 30, 2025, the Management Committee: (1) unanimously approved the tariff revisions as conditionally accepted by the April 14 Order (including the revisions submitted as part of the April 22 Filing); and (2) provided its concurrence for such revisions to become permanent. Consequently, the revisions conditionally accepted by the April 14 Order are no longer subject to the 120-day limitation specified in Section 19.01 of the ISO Agreement and will remain in effect permanently, subject to the Commission’s acceptance of the April 22 Filing.

II. 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. The NYISO will also send an electronic link to this filing to the official representative of each of its customers, and each participant on its stakeholder committees. This filing will also be posted on the NYISO’s website at www.nyiso.com.

⁴ *New York Indep. Sys. Operator, Inc.*, Order Accepting Tariff Revisions, Subject to Condition, and Dismissing Complaint, 191 FERC ¶ 61,030 (Apr. 14, 2025) (“April 14 Order”).

⁵ *New York Indep. Sys. Operator, Inc.*, Compliance Filing; Docket No. ER25-1462-001 (filed Apr. 22, 2025) (“April 22 Filing”).

III. Conclusion

The NYISO respectfully requests that the Commission accept this notice. The NYISO is not asking the Commission to take any further action in response to this submittal and does not believe that any such action is needed.

Respectfully submitted,

/s/ Garrett E. Bissell

Garrett E. Bissell

Assistant General Counsel

New York Independent System Operator, Inc.

10 Krey Boulevard

Rensselaer, New York 12144

Telephone: 518-356-6000

Email: gbissell@nyiso.com

cc: Janel Burdick
Emily Chen
Jignasa Gadani
Jette Gebhart
Leanne Khammal
Jaime Knepper
Kurt Longo
David Morenoff
Jason Rhee
Douglas Roe

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 23rd day of May 2025.

/s/ Alexander Morse

Alexander Morse
New York Independent System Operator, Inc.
10 Krey Blvd.
Rensselaer, NY 12144
(518) 285-7826