

October 15, 2025

By Electronic Delivery

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

**Re: *New York Independent System Operator, Inc.*; Compliance Filing and
Notice of Effective Date, Docket No. ER19-2276-_____**

Dear Secretary Reese:

In accordance with the requirements of the Federal Energy Regulatory Commission’s (“Commission”) January 23, 2020 Order Accepting Tariff Revisions and Directing Compliance Filing and Informational Report (“January 2020 Order”)¹ and its April 21, 2020 and July 9, 2024 Delegated Letter Orders,² and as explained in the New York Independent System Operator, Inc.’s (“NYISO”) subsequent notices and filings in this proceeding,³ the NYISO submits this filing to establish the effective date of October 31, 2025, for the tariff revisions terminating the NYISO’s Day-Ahead Demand Response Program (“DADRP”) and Demand Side Ancillary Service Program (“DSASP”).

I. Background

On June 27, 2019, the NYISO filed proposed revisions to its Market Administration and Control Area Services Tariff (“Services Tariff”) and Open Access Transmission Tariff (“OATT”) to establish a new participation model for Aggregations of Resources,⁴ including

¹ *New York Indep. Sys. Operator, Inc.*, 170 FERC ¶ 61,033 (2020) (“January 2020 Order”).

² See *New York Indep. Sys. Operator, Inc.*, Docket No. ER19-2276, Letter Order (Apr. 21, 2020) (“April 2020 Order”); *New York Indep. Sys. Operator, Inc.*, Docket No. ER19-2276, Letter Order (July 9, 2024) (“July 2024 Order”).

³ See *New York Indep. Sys. Operator, Inc.*, Notice Establishing an Effective Date for the Distributed Energy Resource and Aggregation Participation Model, Docket No. ER19-2276-000, et al. (Sept. 29, 2023) (“September 2023 Notice”); *New York Indep. Sys. Operator, Inc.*, Notice of Delayed and Revised Effective Date Applicable to the Implementation of the Distributed Energy Resource and Aggregation Participation Model, Docket No. ER19-2276-000, et al. (Oct. 19, 2023) (“October 2023 Notice”); *New York Indep. Sys. Operator, Inc.*, Compliance Filing, Submission of Tariff Records for the Distributed Energy Resource and Aggregation Participation Model; Docket No. ER19-2276-000, et al. (Apr. 16, 2024) (“April 2024 DER Filing”).

⁴ Capitalized terms that are not otherwise defined in this filing shall have the meaning specified in NYISO Open Access Transmission Tariff (“OATT”) and NYISO Market Administration and Control Area Services Tariff (“Services Tariff”).

Distributed Energy Resources (“DER”).⁵ As part of these revisions, the NYISO proposed tariff revisions to sunset the DADRP and DSASP.

On January 23, 2020, the Commission issued the January 2020 Order accepting the NYISO’s proposed Aggregation participation model and directing a further compliance filing and informational filings. In the order, the Commission noted that the NYISO filed several tariff records with a requested effective date of “12/31/9998” and directed the NYISO to make a compliance filing proposing revised effective dates for when it intends to implement the tariff records.⁶ Among the proposed revisions without a specified effective date were the tariff revisions necessary to sunset the DADRP and DSASP.⁷ In its subsequent compliance filing, the NYISO proposed to “submit a compliance filing at least two weeks prior to its proposed effective date that will specify the date on which the revised language will take effect.”⁸ On April 21, 2020, the Commission issued a letter order accepting the compliance filing in which the NYISO proposed to provide two weeks’ notice before making the tariff revisions necessary to sunset the DADRP and DSASP effective.⁹

Following the April 2020 Order, the NYISO submitted several notices to the Commission revising the timeframe for the effective date of its tariff revisions, including but not limited to the changes necessary to sunset the DADRP and DSASP.¹⁰ On April 16, 2024, the NYISO submitted tariff records in Docket No. ER19-2276 to make the DER and Aggregation tariff revisions effective on that date (“April 2024 DER Filing”).¹¹ However, the NYISO noted that it was not making the revisions to sunset the DADRP and DSASP effective at that time in order to provide sufficient time for existing participants in the DADRP and DSASP to transition to the new DER and Aggregation participation models.¹² The NYISO provided an attachment to the April 2024 DER Filing highlighting the portions of its accepted tariff revisions necessary to sunset the DADRP and DSASP that would be made effective in a subsequent filing.¹³ That attachment is provided again as Attachment III to this filing for the Commission’s reference. On July 9, 2024, the Commission issued a letter order accepting the April 2024 DER Filing (“July 2024 Order”).¹⁴

⁵ *New York Independent System Operator, Inc.*, Docket No. ER19-2276, Transmittal Letter (June 27, 2019) (“2019 DER Filing”).

⁶ January 2020 Order, P 35.

⁷ See 2019 DER Filing, atts. XI-XIV.

⁸ *New York Independent System Operator, Inc.*, Docket No. ER19-2276, Compliance Filing (Feb. 24, 2020).

⁹ See April 2020 Order.

¹⁰ See September 2023 Notice and October 2023 Notice.

¹¹ *New York Independent System Operator, Inc.*, Docket No. ER19-2276, Compliance Filing (Apr. 16, 2024) (“April 2024 DER Filing”).

¹² *Id.* at 3.

¹³ See *id.* at att. III.

¹⁴ See July 2024 Order.

II. Notice of Effective Date

In compliance with the January 2020 Order, the April 2020 Order, and the July 2024 Order, the NYISO hereby provides this Notice of Effective Date to sunset its DADRP and DSASP on October 31, 2025, and submits tariff records reflecting this October 31, 2025 date. The NYISO has notified its Market Participants of the upcoming termination of these programs.

The NYISO submits this notice concurrently with another compliance filing and notice of effective date in Docket No. ER23-2040, which contains additional changes necessary to sunset the DADRP and DSASP.

Consistent with the Commission's eTariff requirements and input from Commission staff, the NYISO will submit a subsequent filing using eTariff Filing Code 85 (Compliance Filing – New Docket) to incorporate these tariff revisions and the tariff revisions included in Docket No. ER23-2040 with the NYISO's currently effective tariff language.

III. Documents Submitted

The NYISO respectfully submits the following with this filing letter:

1. A clean version of the revisions to the Services Tariff that were accepted in the January 2020 Order, with an effective date of October 31, 2025 (Attachment I);
2. A clean version of the revisions to the OATT that were accepted in the January 2020 Order, with an effective date of October 31, 2025 (Attachment II); and
3. Attachment III from the April 2024 DER Filing, which highlights the portions of the tariff revisions accepted in this proceeding that concern the termination of the DADRP and DSASP (Attachment III).

IV. Service

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, to the New York State Public Service Commission, and to 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, 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.

V. Conclusion

The NYISO respectfully requests that the Commission accept this compliance filing and applicable tariff records.

Respectfully submitted,

/s/ Michael J. Messonnier, Jr.
Michael J. Messonnier, Jr.
Johnson A. Mihaly

Hunton Andrews Kurth LLP
951 East Byrd Street
Richmond, VA 23219
Tel: (804) 788-8200
mmessonnier@hunton.com
jmihaly@hunton.com

Counsel for the
New York Independent System Operator, Inc.

cc: Janel Burdick
Emily Chen
Jignasa Gadani
Jette Gebhart
Leanne Khammal
Jaime Knepper
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 15th day of October 2025.

/s/ Elizabeth Rilling

Elizabeth Rilling
New York Independent System Operator, Inc.
10 Krey Blvd.
Rensselaer, NY 12144
(518) 356-6177