

October 24, 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. ER26-\_\_\_\_-000, *New York Independent System Operator, Inc.*;  
Installed Capacity Market Parameter Enhancements for Certain New Entry**

Dear Secretary Reese:

In accordance with Section 205 of the Federal Power Act<sup>1</sup> and Part 35 of the regulations of the Federal Energy Regulatory Commission (“Commission”), the New York Independent System Operator, Inc. (“NYISO”) submits proposed revisions to its Market Administration and Control Area Services Tariff (“Services Tariff”) to enhance the determination of Installed Capacity (“ICAP”) market parameters for certain new entry conditions.<sup>2</sup>

The NYISO respectfully requests that the proposed revisions become effective December 24, 2025 (*i.e.*, the day following the end of the statutory 60-day notice period). The NYISO will first utilize the enhancements for the upcoming 2026-2027 Capability Year.

### **I. List of Documents Submitted**

The NYISO submits the following with this filing letter:

1. A clean version of the proposed revisions to the Services Tariff (“Attachment I”); and
2. A blacklined version of the proposed revisions to the Services Tariff (“Attachment II”).

### **II. Background**

Resource adequacy in New York State is maintained through a series of related processes administered by the New York State Reliability Council, L.L.C. (“NYSRC”) and the NYISO. Annually, the NYSRC conducts a rigorous study to inform its establishment of an installed reserve margin (“IRM”) for the upcoming Capability Year. The IRM represents an additional quantity of capacity that must be procured above the NYISO’s forecasted peak load to meet a resource adequacy criterion of not exceeding a loss of load expectation (“LOLE”) greater than

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<sup>1</sup> 16 U.S.C. § 824d.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning specified in the Services Tariff and the NYISO Open Access Transmission Tariff (“OATT”).

0.1 loss of load event days per year. The NYISO's forecasted peak load, plus the additional capacity required to meet the IRM establishes the minimum capacity procurement requirements for the New York Control Area. The NYISO is also required to establish Locational Minimum Installed Capacity Requirements ("LCRs") for certain transmission-constrained areas (*i.e.*, Localities).<sup>3</sup> LCRs require Load Serving Entities ("LSEs") serving customers within a Locality to procure a portion of their capacity purchase obligations from capacity supply resources electrically located within such Locality. These locational requirements: (1) recognize limitations on the system's ability to flow power from less constrained areas into the Localities; and (2) seek to ensure that meeting the minimum capacity procurement requirements does not result in reliance on power flows in excess of such transfer capability.<sup>4</sup>

The IRM and the associated study serve as foundational inputs to the NYISO's administration of its ICAP market.<sup>5</sup> These inputs serve as the starting point for deriving various ICAP market parameters, including LCRs, LSE capacity procurement requirements, Capacity Accreditation Factor ("CAF") values, Unforced Capacity ("UCAP") availability ratings for capacity supply resources, the availability of capacity import rights, Peak Load Windows for duration-limited resources, and the translation of the ICAP Demand Curves to UCAP terms.

Currently, the IRM is established annually by the NYSRC. The annual IRM study assumptions include the expected operating status of capacity supply resources for the upcoming Capability Year. To inform such assumptions, the IRM study process evaluates available information at the time the study is conducted.<sup>6</sup> For purposes of the IRM study, the resource status assumptions apply for the entire study year. Although the NYSRC currently adopts a single IRM value annually, the study process includes a series of sensitivities and identifies other considerations to provide information regarding the potential impact of varying assumptions on the resulting IRM value. These sensitivities and additional considerations identify a range of

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<sup>3</sup> There are currently three Localities located in the southeastern/downstate region of New York: (1) the G-J Locality (*i.e.*, Load Zones G, H, I, and J); (2) New York City (*i.e.*, Load Zone J); and (3) Long Island (*i.e.*, Load Zone K).

<sup>4</sup> As described in Section 5.11.4 of the Services Tariff, among other considerations, the NYISO is required to ensure that LCRs are not established at levels that assume reliance on power transfer levels that would exceed NYISO-determined transmission security limits into the Localities.

<sup>5</sup> The NYISO's ICAP market is designed to ensure that there is sufficient generating capacity available to supply energy needs while providing adequate operating reserves. The product bought and sold in the capacity market is called Unforced Capacity. Unforced Capacity represents the amount of ICAP that is available at a particular time. Unforced Capacity essentially represents the amount of ICAP available, adjusted for periods that resources are not available due to forced outages or other limitations on the operating capability of a resource.

<sup>6</sup> The IRM study occurs during the calendar year prior to the start of the Capability Year for which the IRM will apply and is finalized toward the end of such calendar year. For example, in 2025, the NYSRC will establish the IRM applicable for the 2026-2027 Capability Year.

potential IRM values for consideration by the NYSRC when determining the final value for the upcoming Capability Year.<sup>7</sup>

Because the IRM and the associated study serve as a starting point for the determination of various parameters used in the NYISO's administration of its ICAP market, the resource operating assumptions reflected in the IRM study can impact such parameters. As further described herein, the NYISO proposes enhancements to its current procedures for determining ICAP market parameters to reduce potential adverse impacts that can arise when the entry of certain new capacity supply resources does not align with the assumptions incorporated in the IRM study.

### **III. Description of Proposed Tariff Revisions**

The IRM study includes an assumed operating status for potential new capacity supply resources. For purposes of the IRM study, such assumptions apply for the entirety of the upcoming Capability Year. The actual timing of new resource entry, however, may not align with such static assumptions.

For example, if the IRM study models a new capacity supply resource as operational for the upcoming Capability Year, the study assumes that the new resource will commence ICAP market participation at the start of the applicable Capability Year (*i.e.*, the new resource will commence participation for the May delivery month of such Capability Year). The actual timing of ICAP market entry, however, may not align with the start of the Capability Year. Similarly, if the IRM study does not include a potential new capacity supply resource, the study presumes that such resource will not commence ICAP market participation at any point during the upcoming Capability Year. However, such a resource may commence market participation during the Capability Year despite its assumed status in the IRM study.

The NYSRC's capability to consider the impacts of varying assumptions in determining an IRM value for the upcoming Capability Year helps mitigate the potential impact of alternative study assumptions on the resulting ICAP market parameters. However, new entry by a capacity supply resource that causes a change in the contingencies evaluated for assessing the system's capability to flow power into a Locality requires careful consideration due to the potential for such a resource to significantly impact ICAP market parameters. Such a significantly impactful new capacity supply resource is referred to as a "triggering resource" for purposes of this proposal.

Misalignment between the actual timing of market entry by a triggering resource and the assumptions for such timing used in the development of ICAP market parameters can result in suboptimal market outcomes that may not accurately reflect actual market conditions. For example, the development of locational capacity requirements that assume the presence of a triggering resource when such resource has not yet commenced ICAP market participation may

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<sup>7</sup> See, e.g., Docket No. ER25-801-000, *New York State Reliability Council, L.L.C.*, Motion to Intervene and Comments of the New York Independent System Operator, Inc. at 5-6 (January 13, 2025).

result in market outcomes that indicate tighter supply conditions than exist. Conversely, if locational requirements are developed that do not account for the addition of a triggering resource, ICAP market price signals could reflect excessive levels of capacity supply upon the triggering resource's entry.

To help improve the alignment of ICAP market parameters with the timing of new entry by a triggering resource, the NYISO proposes enhancements to its current rules for determining ICAP market parameters. Such enhancements consist of: (1) procedures to develop two sets of ICAP market parameters reflecting different operational status conditions for a triggering resource; and (2) a requirement for a triggering resource to achieve a development "milestone" prior to being eligible to submit a notice of intent to commence participation in the ICAP market. Together, these enhancements seek to facilitate the use of ICAP market parameters that more accurately reflect the status of triggering resources.

### **A. ICAP Market Parameter Enhancements**

The NYISO proposes adding a new Section 5.11.7 to the Services Tariff to address the procedures applicable for a Capability Year that includes a triggering resource. The new section addresses: (1) the process and timing to identify whether a triggering resource exists for the upcoming Capability Year; (2) the requirements to develop two sets of ICAP market parameters that reflect different operating status conditions for a triggering resource; (3) the applicable parameters used in the administration of the ICAP market; (4) the requirements for potentially changing the applicable ICAP market parameters during a Capability Year; and (5) the requirements for a triggering resource to provide notice of its intent to commence ICAP market participation.<sup>8</sup>

The NYISO's proposal to develop and potentially use alternative ICAP market parameters is similar to the existing Commission-approved authority to develop differing LCRs for certain conditions when a holder of Unforced Capacity Deliverability Rights ("UDRs") first seeks to supply capacity to New York.<sup>9</sup> Under these existing rules, if the UDRs originate from an external area that has a different capacity year start date than the NYISO's Capability Year construct that begins on May 1, the UDR holder may request that the NYISO determine LCRs assuming that the UDRs are not supplying capacity to New York for the May delivery month of the first Capability Year that the UDRs are used to supply capacity.<sup>10</sup> To the extent that the IRM

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<sup>8</sup> Proposed Sections 5.11.7.1 and 5.11.7.2 address the development and use of ICAP market parameters for a Capability Year that includes a triggering resource. Proposed Section 5.11.7.3 addresses the requirements for a triggering resource's submission of a notice of intent to commence ICAP market participation.

<sup>9</sup> See Docket No. ER10-603-000, *New York Independent System Operator, Inc.*, Proposed Tariff Revisions to Establish a One-Time Capability Year Adjustment Election for Holders of Unforced Deliverability Rights, Request for Waiver of Prior Notice Requirements, and Requested for Expedited Action (January 14, 2010); and Docket No. ER10-603-000, *supra*, Letter Order (February 3, 2010).

<sup>10</sup> For example, the respective capacity year constructs in PJM Interconnection, L.L.C. and ISO New England Inc. currently begin on June 1. This one-time election option for a qualifying UDR holder is intended to account for the potential that external capacity the UDR holder intends to supply to New

study assumes that such UDRs would be supplying capacity for all months of the Capability Year, these existing rules authorize the NYISO to develop certain of its ICAP market parameters using alternative capacity supply resource assumptions for a period of time.

### 1. Identification of Triggering Resource Existence

Prior to determining the LCRs for the upcoming Capability Year, the NYISO will conduct an assessment of potential new capacity supply resources that may commence ICAP market participation during the upcoming Capability Year to determine whether a triggering resource exists.<sup>11</sup> The NYISO's assessment will evaluate potential new entrants that: (1) have already been awarded Capacity Resource Interconnection Service ("CRIS"); or (2) have their request for CRIS being actively evaluated in the NYISO's interconnection study processes.

If a qualifying potential new capacity supply resource would result in a change to the contingencies evaluated for assessing system transfer capability into a Locality, such resource will constitute a triggering resource.<sup>12</sup> A potential new capacity supply resource that would change the contingencies evaluated in assessing the transfer capability into a Locality provides a reasonable indicator of a resource that has the potential to materially impact the resulting ICAP market parameters for the upcoming Capability Year. Such transfer capability values are critical inputs in determining the transmission security limits assessed by the NYISO when determining LCRs. Changes in such transmission security limits can produce different LCRs. Different LCRs can similarly result in impacts to downstream ICAP market parameters, such as CAF values, resource UCAP ratings, LSE capacity requirements, and UCAP-based demand curves.

The NYISO will apply the proposed rules for triggering resources beginning with the upcoming 2026-2027 Capability Year. The NYISO has identified that the UDRs awarded to the Champlain Hudson Power Express ("CHPE") project would constitute a triggering resource for

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York may need to complete its delivery obligations in an external area from the prior capacity year before it is available to be supplied in New York.

<sup>11</sup> The process for developing the LCRs typically commences in fourth calendar quarter of the calendar year prior to the commencement of a Capability Year. The NYISO customarily reviews final LCRs values with stakeholders at the NYISO Operating Committee in January of the calendar year in which the Capability Year starts. For example, for the upcoming 2026-2027 Capability Year, the NYISO would typically begin the process of developing LCRs during the fourth calendar quarter of 2025 and present final recommended values to stakeholders at the NYISO Operating Committee in January 2026.

<sup>12</sup> As described in Section 5.11.7 of the Services Tariff, if more than one potential new capacity supply resource qualifies as a triggering resource for a particular Capability Year, only one such resource will be designated as the triggering resource for purposes of the procedures described in Section 5.11.7. The NYISO will review several factors in evaluating the potential candidate resources and developing a recommendation for which resource to designate. The designation of the candidate resource to serve as the single triggering resource for such Capability Year would be subject to approval by stakeholders at the NYISO Operating Committee. Such designation would be completed before the NYISO determines the LCRs for such Capability Year.

the 2026-2027 Capability Year.<sup>13</sup> The project is currently anticipated to commence operation and begin use of the associated UDRs to participate in the ICAP market during the upcoming 2026 Summer Capability Period. The UDRs associated with the project would constitute a triggering resource for the 2026-2027 Capability Year because: (1) the project has been awarded CRIS; and (2) accounting for the project's UDRs would result in a change to the contingencies evaluated in assessing the transfer capability into Load Zone J.<sup>14</sup> Accordingly, the NYISO intends to proceed with the development of two sets of ICAP market parameters for the 2026-2027 Capability Year consistent with the requirements of this proposal.

## 2. Development and Use of ICAP Market Parameters

Currently, the study case resulting from the final IRM approved by the NYSRC for the upcoming Capability Year serves as the starting point database for the NYISO to develop various ICAP market parameters. However, if a triggering resource exists for the upcoming Capability Year, the NYISO proposes to develop two sets of ICAP market parameters for potential use during the Capability Year. Each set will include LCRs, CAF values, minimum capacity requirements, LSE capacity requirements, UCAP ratings for capacity supply resources, and UCAP demand curves.

The two sets of ICAP market parameters will be derived from starting point databases that reflect different operating status conditions for the triggering resource.<sup>15</sup> The NYISO will develop the two sets of ICAP market parameters consistent with current timing to develop such parameters.<sup>16</sup> One set will represent the operating status assumption for the triggering resource

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<sup>13</sup> The CHPE project is a 1,250 MW high-voltage direct current transmission project connecting Hydro Quebec to Load Zone J. The project has been awarded 1,250 MW of UDRs to facilitate use of the project's capability to supply capacity in Load Zone J.

<sup>14</sup> See, e.g., NYISO, *2026-2027 TSL Floor Values Methodology* (presented at the September 8, 2025 NYISO Installed Capacity Working Group meeting) at 10-13, available at: <https://www.nyiso.com/documents/20142/53789919/2026-2027%20TSL%20Floor%20Methodology%20Update.pdf>; and NYISO, *2026-2027 Locality Bulk Power Transmission Capability Report* at 7-8, available at: <https://www.nyiso.com/documents/20142/53789919/2026%20Locality%20Bulk%20Power%20Transmission%20Capability%20Report.pdf>.

<sup>15</sup> Consistent with current requirements, the availability of capacity import rights and the Peak Load Windows will continue to be determined using only the case resulting from the NYSRC-approved IRM. As a result, these parameters will be the same for each set developed by the NYISO for a Capability Year that includes a triggering resource.

<sup>16</sup> The timing to develop the various ICAP market parameters in advance of each Capability Period is parameter-dependent and does not occur simultaneously for all parameters. However, consistent with current procedures, the NYISO would, under its proposal, develop two sets of parameters consistent with the timing for developing ICAP market parameters absent a triggering resource. For example, final LCRs for the upcoming Capability Year are typically reviewed with stakeholder in January immediately preceding the start of the applicable Capability Year. For a Capability Year that includes a triggering resource, the final LCRs reviewed with stakeholders would include two sets of LCRs reflecting the different potential operating status conditions of the triggering resource. Similarly, the NYISO is

as reflected in the case resulting from the final IRM approved by the NYSRC. The second set will reflect the opposite operating status assumption for the triggering resource.<sup>17</sup> The operating status of all other capacity supply resources will remain unchanged from the assumptions reflected in the case representing the final IRM approved by the NYSRC. The alternative case developed by the NYISO must maintain the final IRM approved by the NYSRC. The NYISO must also ensure that the resulting LOLE of the alternative case does not exceed the LOLE associated with the NYSRC-approved IRM.

The parameters used to administer the ICAP market will depend on the status of the triggering resource. If the triggering resource timely provides a valid notice of its intent to commence ICAP market participation starting with the May delivery month (*i.e.*, the first delivery month of a Capability Year), the NYISO will, within five business days after receipt of triggering resource's notice, provide notice to the marketplace that ICAP market parameters reflecting that the triggering resource is participating in the ICAP market will be implemented starting with the May delivery month and remain in effect for the entire Capability Year.

If the triggering resource does not timely provide a valid notice of its intent to commence ICAP market participation starting with the May delivery month, the NYISO will, prior to the start of the Summer Capability Period strip auction, provide notice to the marketplace that ICAP market parameters reflecting that the triggering resource is not participating in the ICAP market will be implemented starting with the May delivery month. Such ICAP market parameters will remain in effect for the entire Capability Year unless the triggering resource subsequently provides a valid notice of its intent to commence ICAP market participation for any delivery month during the Summer Capability Period (*i.e.*, for any delivery month prior to the November delivery month).

If the triggering resource timely provides a valid notice of its intent to commence ICAP market participation for a delivery month during the Summer Capability Period, the NYISO will notify the marketplace within five business days after receipt of the triggering resource's notice that it will implement ICAP market parameters reflecting that the triggering resource is participating in the ICAP market. The NYISO will implement the revised ICAP market parameters for the same delivery month indicated in the triggering resource's notice.<sup>18</sup> ICAP market parameters reflecting participation of the triggering resource would then remain in effect for the balance of the Capability Year.

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currently required to provide final CAF values for the upcoming Capability Year by March 1. For a Capability Year that includes a triggering resource, the NYISO would provide two sets of final CAF values reflecting the different potential operating status conditions of the triggering resource.

<sup>17</sup> For example, if the case resulting from the final IRM approved by the NYSRC assumed that the triggering resource would be in-service and participating in the ICAP market, the alternative case would represent an assumption that the triggering resource was not participating in the ICAP market.

<sup>18</sup> For example, if the triggering resource timely provides a valid notice of intent to commence ICAP market participation starting with the July delivery month, the NYISO would implement ICAP market parameters reflecting participation by the triggering resource starting with the July delivery month.

If the triggering resource does not timely provide a valid notice of its intent to commence ICAP market participation for any delivery month during the Summer Capability Period, the NYISO will provide notice to the marketplace prior to the start of the Winter Capability Period strip auction to confirm that ICAP market parameters reflecting that the triggering resource is not participating in the ICAP market will be retained for the balance of the Capability Year. This limitation on updating ICAP market parameters recognizes that New York's current electric grid is predominantly a summer risk system resulting in an IRM that is primarily based on meeting summer LOLE risk. Given these conditions, a new capacity supply resource that does not participate during the Summer Capability Period would not contribute to resolving the LOLE risks that shaped the IRM. Notably, however, New York's electric grid and resource adequacy risk profile is evolving in response to resource, topology, and load changes that are increasing the level of winter reliability risk. As the grid evolves, the NYISO will continue to monitor the emergence and level of winter reliability risks to determine, in collaboration with its stakeholders, whether future refinements to this aspect of the proposal may be warranted.

The limitation on updating ICAP market parameters does not restrict the ability of the triggering resource to commence ICAP market participation during the Winter Capability Period. The triggering resource can timely submit a valid notice of intent to commence ICAP market participation for any delivery month during the Winter Capability and, subject to satisfying the applicable requirements to participate, commence participation. The NYISO will not, however, revise the ICAP market parameters to reflect such entry.<sup>19</sup>

## **B. Notice of Intent to Commence ICAP Market Participation**

New capacity supply resources are required to submit a notice of intent to commence ICAP market participation indicating the first delivery month the resource seeks to begin participating in the ICAP market.<sup>20</sup> Currently, new capacity supply resources must submit such notice by the first business day of the month that is two months prior to the start of the delivery month for which the resource seeks to commence ICAP market participation.<sup>21</sup> New capacity supply resources are not currently required to achieve any "milestone" requirements prior to submitting such notices. As a result, such notices may be submitted initially to reflect the earliest possible timeframe a new capacity supply resource could potentially seek to begin participating in the ICAP market. Such notices could result in potential updates/resubmittals over time to revise the anticipated timeframe for the resource to commence ICAP market participation as development and registration activities unfold.

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<sup>19</sup> ICAP market parameters for the following Capability Year would reflect the participation of the resource provided that such participation is expected to continue.

<sup>20</sup> The detailed requirements regarding submission of such notices are set forth in Section 4.2.5 of the NYISO Installed Capacity Manual. The NYISO proposes clarifying revisions to Section 5.12.1.1 of the Service Tariff to expressly reference such notice requirement.

<sup>21</sup> For example, if a new resource sought to commence ICAP market participation for the May delivery month, it would need to submit the required notice by the first business day of March.

As described above, for triggering resources, the NYISO proposes to utilize the notice of intent to commence ICAP market participation to inform the applicable parameters to be used in administering the ICAP market. Thus, additional certainty is required regarding the likelihood of achieving the delivery month indicated in the triggering resource's notice. To provide adequate certainty that the triggering resource can commence ICAP market participation consistent with the timing indicated in its notice, the NYISO proposes to require that triggering resources satisfy a development milestone before they can submit such notice.<sup>22</sup> Specifically, the NYISO proposes that a triggering resource must successfully complete Trial Operation before it can submit a notice of intent to commence ICAP market participation.<sup>23</sup> Successful completion of Trial Operation is intended to ensure that the triggering resource has completed all necessary commissioning and testing to enter Commercial Operation. Achievement of this milestone provides reasonable certainty that the triggering resource is capable of commencing ICAP market participation consistent with the timing indicated in its notice.<sup>24</sup>

In recognition of the new milestone requirement, the NYISO also proposes reducing the advance notice required for triggering resources seeking to commence ICAP market participation in delivery months other than the first delivery month of each Capability Period (*i.e.*, the May and November delivery months). For delivery months other than May or November, the NYISO proposes that a triggering resource must submit the required notice by the tenth calendar day of the month that is two months prior to the start of the applicable delivery month for which the triggering resource seeks to commence ICAP market participation.<sup>25</sup> However, due to the timing of the processes and procedures necessary to prepare for the administration of the ICAP market in advance of each Capability Period,<sup>26</sup> the NYISO proposes to retain the existing advance notice requirement for notices seeking to commence ICAP market participation for the first delivery month of a Capability Period. Accordingly, a triggering resource would need to submit a valid notice by the first business day of the month that is two months prior to the start of the applicable

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<sup>22</sup> The NYISO does not propose any change to the existing notice requirements for new capacity supply resources that are not a triggering resource.

<sup>23</sup> Section 30.1 of Attachment X to the NYISO OATT and Section 40.1 of Attachment HH to the NYISO OATT define Trial Operation to refer to the period during which a project is engaged in on-site test operations and commissioning prior to Commercial Operation.

<sup>24</sup> In addition to submitting the required notice of intent to commence ICAP market participation, a triggering resource, like other new capacity supply resources, must complete all required activities for approval to participate in the ICAP market, including any applicable capability testing, data submission, and other registration requirements.

<sup>25</sup> For example, a triggering resource would need to submit a valid notice by May 10 to indicate its intent to commence ICAP market participation for the July delivery month.

<sup>26</sup> The NYISO is required to conduct the strip auction for each Capability Period no later than 30 days prior to the first day of each Capability Period (*i.e.*, May 1 is the first day of the Summer Capability Period and November 1 is the first day of the Winter Capability Period). The NYISO typically provides all necessary information to the marketplace related to administration of the capacity market for a particular Capability Period approximately two weeks prior to the conduct of the strip auction. This includes determination of the respective capacity requirements for each LSE, UCAP ratings for capacity supply resources, and UCAP-based demand curves.

delivery month if the triggering resource seeks to commence ICAP market participation for either the May or November delivery month.

Upon receipt of a notice of intent to commence ICAP market participation from a triggering resource, the NYISO will seek to confirm the validity of such notice by verifying that the triggering resource has successfully completed Trial Operation. Such verification would include review of any testing and commissioning plan for the triggering resource and/or other relevant information.<sup>27</sup> If the NYISO determines that the triggering resource has not successfully completed Trial Operation, the notice would be deemed invalid and the triggering resource would need to submit a subsequent notice following successful completion of Trial Operation.

#### **IV. Effective Date**

The NYISO respectfully requests that the proposed tariff revisions become effective on December 24, 2025 (*i.e.*, the day following the end of the statutory 60-day notice period).

The NYISO intends to first utilize the proposed enhancements for the upcoming 2026-2027 Capability Year. The proposed effective date seeks to ensure that the proposed enhancements are effective prior to development of final LCR values for the upcoming 2026-2027 Capability Year.

#### **V. Requisite Approvals**

Stakeholders unanimously approved the proposal at the Management Committee on September 24, 2025. The NYISO Board of Directors approved the proposed enhancements on October 21, 2025.

#### **VI. Correspondence**

Please direct all communications and service in this proceeding to:

Robert E. Fernandez, Executive Vice President, General Counsel & Chief Compliance Officer  
Karen G. Gach, Deputy General Counsel  
Stephanie Amann, Senior Manager, Regulatory & Government Affairs  
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<sup>27</sup> As described in Section III.A.2 above, the NYISO is required in certain instances to provide notice to the marketplace within five business days after receipt of a notice from a triggering resource. This period is, in part, intended to facilitate the NYISO's verification that the triggering resource has successfully completed Trial Operation.

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Email: [gbissell@nyiso.com](mailto:gbissell@nyiso.com)

\*Person designated for receipt of service.

## **VII. Service**

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

## **VIII. Conclusion**

The NYISO respectfully requests that the Commission accept the proposed revisions to the Services Tariff attached hereto with an effective date of December 24, 2025.

Respectfully submitted,

/s/ Garrett E. Bissell

Garrett E. Bissell, Assistant General Counsel  
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