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VIA ELECTRONIC FILING

November 17, 2025

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

**Re: New York Independent System Operator, Inc.  
New York Power Authority  
Docket No. ER25-198-000  
Offer of Settlement**

Dear Secretary Reese:

Pursuant to Rule 602 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.602 (2025), the New York Power Authority (“NYPA”) hereby submits by electronic filing an Offer of Settlement (“Settlement”) in the above-referenced proceeding. This Settlement is intended to resolve all issues in the above-referenced docket.<sup>1</sup>

In accordance with Rule 602(c)(1), this Settlement filing consists of the following documents:

1. This transmittal letter;
2. An explanatory statement;
3. The Settlement including attached Appendices A through D, displaying revised tariff sheets, in red-line and clean, reflecting agreed-upon revisions to Attachment H of the New York Independent System Operator, Inc. (“NYISO”) Open Access Transmission Tariff (“OATT”), including NYPA’s Formula Rate Template, which are included

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<sup>1</sup> On behalf of NYPA, the New York Independent System Operator, Inc. (“NYISO”) submits this filing via eTariff solely in its role as the Tariff Administrator for the NYISO Open Access Transmission Tariff (“OATT”). NYPA, as the party sponsoring this filing, assumes the burden of proof with respect to the Settlement and related tariff revisions. The NYISO takes no position on any substantive aspect of this filing at this time.

within Appendices A and B and revised NYPA's Formula Rate Protocols, which are included within Appendices C and D;<sup>2</sup> and

4. A certificate of service.

Within 30 days of a Commission order approving the Settlement, NYPA, in conjunction with the NYISO, will cause to be filed with the Commission the tariff records included in Appendices A-D filed with this Settlement in eTariff format consistent with Order No. 714 to ensure that NYISO's "electronic tariff provisions reflect the Commission's actions." *Pac. Gas & Elec. Co.*, 132 FERC ¶ 61,073 at P 3 (2010).

NYPA respectfully requests that the Settlement be transmitted to Settlement Judge Patricia M. French for certification pursuant to Rule 602(b)(2)(i). In addition, NYPA respectfully requests that Judge French certify the Settlement to the Commission at the earliest possible date and that the Commission promptly approve the Settlement, without modification or condition, on the grounds that it is fair and reasonable and in the public interest, represents an agreement between NYPA and the parties in this proceeding,<sup>3</sup> and fully resolves all issues in the proceeding.

NYPA certifies that it is serving a complete copy of the Settlement on all parties to the above-referenced proceeding. As explained in the Explanatory Statement, due to the narrowness of the issues addressed in this Settlement, which is uncontested by any active party or FERC Staff, NYPA believes there is good cause to request a shortened comment period for initial comments and waiver of reply comments on the Uncontested Offer of Settlement. The Settling Parties, the other active parties and FERC Staff have authorized NYPA to request the initial comment period be shortened to 7 days and, because there is no need for replies, that reply comments be waived.

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<sup>2</sup> The *pro forma* tariff records submitted as part of this Settlement include the tariff revisions previously approved by the Commission in Docket No. ER25-676, which became effective February 4, 2025 (*i.e.*, after the November 1, 2024 effective date accepted by the Commission for the tariff revisions in this proceeding). In a subsequent compliance filing in this proceeding following issuance of an order approving the Settlement, NYPA will coordinate with the NYISO to submit actual tariff records that reflect the appropriate time sequencing of the tariff revisions proposed in this proceeding and those approved in Docket No. ER25-676.

<sup>3</sup> The Settling Parties include the following: NYPA; Multiple Intervenors (an unincorporated association of approximately 55 large industrial, commercial, and institutional energy consumers with manufacturing and other facilities located in New York State) and its members; New York Association of Public Power, and Municipal Electric Utilities Association of New York. The City of New York, Consolidated Edison Company of New York, Inc. and the New York State Public Service Commission ("NYSPSC") participated in settlement proceedings and agreed not to oppose the settlement but are not party to this Settlement. In accordance with their customary way of participating in settlements, FERC Staff is not a "Settling Party," but participated in the proceeding. The participation of the NYISO in this proceeding is limited solely to its role as tariff administrator.

Accordingly, comments on the Settlement would be due on November 24, 2025.

Respectfully submitted,

/s/ Gary D. Bachman  
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Appendices A-D

**CERTIFICATE OF SERVICE**

Pursuant to Rule 2010 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, I hereby certify that I have this day caused the foregoing documents to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 17<sup>th</sup> day of November, 2025.

*/s/ Xena Burwell*  
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