

December 30, 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, Long Island Power Authority; Proposed
Tariff Revisions to Reflect Revised Transmission Service Charges for
the Long Island Power Authority**

Dear Secretary Reese:

In accordance with Section 14.1.2 of Attachment H to its Open Access Transmission Tariff (“OATT”), the New York Independent System Operator, Inc. (“NYISO”),¹ on behalf of the Long Island Power Authority (“LIPA”), hereby submits this request for acceptance by the Federal Energy Regulatory Commission (“FERC” or “Commission”) of revisions to LIPA’s Wholesale Transmission Service Charge (“TSC”) as set forth in Attachment H of the OATT.²

I. List of Documents Submitted

On behalf of LIPA, the NYISO submits the following with this filing letter:

¹ Section 14.1.2 of Attachment H to the OATT states that the components of LIPA’s TSC that LIPA seeks to amend in this filing “will be updated based on Transmission Owner filings to FERC (or a NYISO filing to FERC on behalf of LIPA)” under the Federal Power Act whenever a Transmission Owner determines that a change is required. As further described in Section II below, because LIPA is a FERC non-jurisdictional utility, the NYISO submits this filing to the Commission on LIPA’s behalf and solely in its role as the tariff administrator of the OATT. The burden of supporting the proposed tariff amendments rests with LIPA, the sponsoring party. The NYISO takes no position on any substantive aspect of this filing at this time. Capitalized terms that are not otherwise defined herein shall have the meaning set forth in the OATT.

² As further discussed in Section II below, the Commission has held that it will apply a “comparability standard,” rather than the standard under Section 205 of the Federal Power Act, when evaluating non-jurisdictional transmission tariffs such as LIPA’s TSC. See *Central Hudson Gas & Electric Corp. et al*, 88 FERC ¶ 61,138, at 61403 (1999). See also *New York Independent System Operator, Inc.*, 100 FERC ¶ 61,070 at P 3 (2002) (stating that LIPA’s “transmission tariffs are evaluated under a ‘comparability standard,’ rather than Section 205 of the FPA...”); and *New York Independent System Operator, Inc.*, 111 FERC ¶ 61,366 (2005) (stating that LIPA’s TSC rates are also not subject to review under Section 206 of the FPA). At the request of LIPA, the NYISO therefore makes this filing subject to the Commission’s comparability standard.

1. A clean version of the proposed revisions to Table 1 in Section 14.1.4 of Attachment H to the OATT (“Attachment I”); and
2. A blacklined version of the proposed revisions to Table 1 in Section 14.1.4 of Attachment H to the OATT (“Attachment II”).

II. Description of LIPA’s Proposed Tariff Revisions

As contemplated by Section 14.1.2 of Attachment H to the OATT, the NYISO, on behalf of LIPA, submits changes to Table 1 in Section 14.1.4 of Attachment H to the OATT to revise LIPA’s TSC calculation information. Specifically, on behalf of LIPA, the NYISO submits changes to the stated values for LIPA’s revenue requirement (“RR”), scheduling system control and dispatch costs (“CCC”), billing units (“BU”), and the resulting TSC rate. LIPA’s TSC rate is evaluated by the Commission under the “comparability standard”³ and, as a non-jurisdictional utility, LIPA’s revenue requirement and TSC are established by the Long Island Power Authority’s Board of Trustees (“LIPA Board”) pursuant to the New York State Administrative Procedures Act and Article 5, Title I-A of the New York Public Authorities Law, Section 1020-f(u) and 1020-s.⁴

LIPA’s updated RR, CCC and BU inputs and resulting LIPA TSC rate are included in the clean and redlined versions of the OATT set forth in Attachments I and II to this filing. Specifically, Table 1 in Section 14.1.4 of Attachment H to the OATT will be revised to reflect the following: (1) an updated RR value of \$271,754,825, (2) an updated CCC of \$6,659,271, and (3) an updated BU value of 19,807,092. The revised component values produce an updated LIPA TSC rate of \$14.0563/MWh. LIPA’s billing of the updated TSC will commence with invoices for the period starting January 1, 2026.

The Commission has previously stated that, in light of LIPA’s non-jurisdictional status, it “cannot review LIPA’s rates under the Section 205 just and reasonable standard, but will apply the comparability standard [it uses] when evaluating non-jurisdictional, so-called ‘NJ’ transmission tariffs to assure that the tariff rate is comparable to the rate LIPA charges itself and others.”⁵ LIPA has informed the NYISO that this updated TSC rate applies to all parties using LIPA’s wholesale transmission facilities under the NYISO OATT and satisfies the Commission’s comparability standard. Furthermore, because LIPA is not a “public utility,”

³ *Id.*

⁴ On December 17, 2025, the LIPA Board adopted a resolution updating the formula rate methodology that is used to calculate the three LIPA TSC components. LIPA has informed the NYISO that the values included in this filing have been calculated using the December 2025 LIPA Board-approved updates to the LIPA TSC formula rate. A copy of the Board resolution approving this formula rate update is publicly available at: <https://www.lipower.org/wp-content/uploads/2024/12/8.-Consideration-of-Approval-of-LIPAs-Methodology-for-Updating-the-Formula-Rate-for-LIPAs-Components-of-the-Wholesale-Transmission-Service-Charge.pdf>.

⁵ *Central Hudson Gas & Electric Corp. et al.*, 88 FERC ¶ 61,138, at 61403 (1999).

LIPA has requested that the NYISO inform the Commission that 18 C.F.R. § 35.13 is not applicable with respect to the change in LIPA's TSC rate proposed herein.

III. Effective Date

At the request of LIPA, the NYISO respectfully requests that the tariff revisions proposed in this filing become effective on January 1, 2026, and that, to the extent necessary, the Commission waive any applicable notice requirements.

IV. Correspondence

Please direct all communications and service in this proceeding to:

For the NYISO:

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*Designated for receipt of service.

V. Service

A complete copy of this filing will be posted on the NYISO's website at www.nyiso.com. On behalf of LIPA, 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, on behalf of LIPA, an electronic copy of this filing to the New York State Public Service Commission and the New Jersey Board of Public Utilities.

VI. Conclusion

For the foregoing reasons, the NYISO, on behalf of LIPA, respectfully requests that the Commission accept the proposed tariff changes identified in this filing to become effective on January 1, 2026.

Respectfully submitted,

/s/ Garrett E. Bissell

Garrett E. Bissell, Assistant General Counsel
New York Independent System Operator, Inc.

cc: Janel Burdick
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