

February 4, 2026

### Submitted Electronically

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

Re: *New York Independent System Operator, Inc.*, Compliance Filing to Conform  
Tariff Records; Docket No. ER26-\_\_\_\_-000

Dear Secretary Reese,

On October 15, 2025, the New York Independent System Operator (“NYISO”) submitted effective date notices in Docket Nos. ER19-2276-007 and ER23-2040-004 (collectively, “Effective Date Notices”).<sup>1</sup> The notices informed the Federal Energy Regulatory Commission (“Commission”) that the NYISO was implementing revisions to its Open Access Transmission Tariff (“OATT”) and Market Administration and Control Area Services Tariff (“Services Tariff”) accepted in these proceedings to sunset its Day-Ahead Demand Response Program (“DADRP”) and Demand Side Ancillary Services Program (“DSASP”). The NYISO included in the filings the tariff revisions to sunset the DADRP and DSASP that it had previously submitted in these proceedings with an updated effective date of October 31, 2025.

Consistent with the Commission’s eTariff requirements and input from Commission staff, the NYISO submits this further compliance filing using eTariff Filing Code 85 (Compliance Filing – New Docket) to incorporate the tariff revisions submitted with the Effective Date Notices into the versions of the tariff sections that are effective as of October 31, 2025, to account for changes to the underlying tariff sections since the NYISO’s initial filings of the tariff revisions in these proceedings.

### I. Background

On June 27, 2019, the NYISO submitted to the Commission in Docket No. ER19-2276 proposed revisions to its OATT and Services Tariff to establish a new participation model for Aggregations of Resources,<sup>2</sup> including Distributed Energy Resources (“DERs”) (“2019 DER Filing”).<sup>3</sup> As part of the revisions, the NYISO proposed to sunset the DADRP and DSASP. The

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<sup>1</sup> See *New York Indep. Sys. Operator Inc.*, Compliance Filing and Notice of Effective Date, Docket No. ER19-2276-007 (Oct. 15, 2025) (“ER19-2276 Notice”); *New York Indep. Sys. Operator Inc.*, Compliance Filing and Notice of Effective Date, Docket No. ER23-2040-004 (Oct. 15, 2025).

<sup>2</sup> 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”).

<sup>3</sup> *New York Indep. Sys. Operator, Inc.*, Docket No. ER19-2276, Transmittal Letter (June 27, 2019).

Commission accepted these tariff revisions, which largely became effective on April 16, 2024.<sup>4</sup> However, the NYISO explained to the Commission that it was not yet making effective the revisions to sunset the DADRP and DSASP to provide sufficient time for existing participants in those programs to transition to the new DER and Aggregation participation models.<sup>5</sup> Instead, the NYISO indicated that it would submit a Notice of Effective Date for the tariff revisions in that proceeding required to sunset the DADRP and DSASP at least two weeks before they become effective.<sup>6</sup>

On June 1, 2023, the NYISO submitted additional revisions to its OATT and Services Tariff in Docket No. ER23-2040 to clarify and enhance the requirements for the DER and Aggregation participation model (“2023 DER Filing”).<sup>7</sup> As part of this filing, the NYISO proposed additional tariff revisions required to sunset the DADRP and DSASP and proposed a timeline for participants in these programs to transition to the new DER and Aggregation participation model. The NYISO requested a flexible effective date for the tariff records associated with terminating the DADRP and DSASP. On April 15, 2024, the Commission accepted the revisions proposed in the 2023 DER Filing (“April 2024 Order”).<sup>8</sup> In the April 2024 Order, the Commission directed the NYISO to notify the Commission of the effective date of the tariff record terminating the DADRP and DSASP at least two weeks prior to the proposed effective date of the tariff record.

On October 15, 2025, the NYISO submitted the Effective Date Notices to make the tariff revisions concerning the sunset of the DADRP and DSASP that it submitted in Docket Nos. ER19-2276 and ER23-2040 effective on October 31, 2025. The Commission issued an order on January 9, 2026, accepting the sunset effective date of October 31, 2025, for the tariff revisions.<sup>9</sup>

## II. Compliance Filing

The NYISO’s submission of its previously accepted tariff revisions with an effective date of October 31, 2025, did not account for subsequent updates to the underlying tariff language accepted by the Commission in other proceedings. Accordingly, the NYISO submits herewith using eTariff Filing Code 85 updated tariff sections to incorporate the tariff revisions submitted with the Effective Date Notices into the versions of those tariff sections that are effective as of October 31, 2025, to account for changes to the underlying tariff sections since the NYISO’s

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<sup>4</sup> On January 23, 2020, the Commission issued an order accepting the NYISO’s proposed DER and Aggregation participation models and directed a further compliance filing and informational filings. *New York Indep. Sys. Operator, Inc.*, 170 FERC ¶ 61,033 (2020) (“2020 DER Order”). The Commission subsequently accepted the NYISO’s compliance tariff filing establishing an April 16, 2024, effective date for the tariff provisions accepted in the 2020 DER Order other than those required to sunset the DADRP and DSASP. *New York Indep. Sys. Operator, Inc.*, Docket No. ER19-2276, Letter Order (July 9, 2024) (“July 2024 Order”).

<sup>5</sup> See *New York Indep. Sys. Operator, Inc.*, Docket No. ER19-2276, Compliance Filing (Apr. 16, 2024).

<sup>6</sup> See *id.*

<sup>7</sup> *New York Independent System Operator, Inc.*, Proposed Tariff Revisions Regarding the Participation of Distributed Energy Resources and Aggregations, Docket No. ER23-2040, Filing Letter (June 1, 2023) (“2023 DER Filing”).

<sup>8</sup> *New York Indep. Sys. Operator, Inc.*, 187 FERC ¶ 61,022 (2024).

<sup>9</sup> *New York Indep. Sys. Operator, Inc.*, 194 FERC ¶ 61,025 (2026).

initial filings of the tariff revisions in Docket Nos. ER19-2276 and ER23-2040. In particular, twenty-four (24) of the tariff sections submitted with the Effective Date Notices need to be conformed to address subsequent Commission decisions in other dockets and the timing of the NYISO's implementation of those accepted tariff revisions.<sup>10</sup> None of the conforming changes relate to tariff revisions that were proposed for the Commission's consideration concerning the sunset of the DADRP and DSASP.

The eTariff records attached to this submission contain clean versions of the revised OATT and Services Tariff sections that incorporate the changes that the Commission accepted in Docket Nos. ER19-2276 and ER23-2040 and that the NYISO made effective on October 31, 2025. Additionally, for informational purposes, the impacted tariff sections are listed in Attachment I ("List of Impacted Tariff Sections").

The attached eTariff records also include clean versions of Sections 6.1.9 – 6.1.15 of the OATT to correct the record. The NYISO's April 16, 2024 Effective Date Notice inadvertently filed a tariff record that removed language related to DADRP and DSASP that should have been retained.<sup>11</sup> Accordingly, the NYISO is submitting (1) a clean version of Sections 6.1.9 – 6.1.15, effective from April 16, 2024 to October 31, 2025 that retains the DADRP and DSASP language, and (2) a clean version of Sections 6.1.9 – 6.1.15 that became effective on October 31, 2025.

This compliance filing is submitted to conform the Commission's official electronic Tariff records to the Tariff revisions that the Commission has accepted for filing. Accepting this filing will improve the accuracy of the Commission's eTariff record. Because the changes identified in this filing were accepted by the Commission with effective dates subsequent to the initial submission of the Tariff revisions in Docket Nos. ER19-2276 and ER23-2040, it is appropriate for the NYISO to submit a compliance filing to incorporate them into the Commission's eTariff record.

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<sup>10</sup> Note that of the twenty-four (24) tariff sections submitted with the Effective Date Notices, three (3) tariff sections were filed in both Docket Nos. ER19-2276 and ER23-2040—Sections 2.19, 4.5, and 5.12 of the Services Tariff.

<sup>11</sup> See *New York Indep. Sys. Operator, Inc.*, Docket No. ER19-2276, Compliance Filing (Apr. 16, 2024).

### **III. Documents Submitted**

The eTariff records submitted with this filing contain the conforming eTariff revisions to the OATT and Services Tariff as described above and listed in Attachment I. In particular, the NYISO submits the following documents with this filing letter:

1. The List of Impacted Tariff Sections (“Attachment I”);
2. A clean version of the conforming revisions to Services Tariff sections included in the List of Impacted Tariff Sections described above (“Attachment II”);
3. A blacklined version of the conforming revisions to Services Tariff included in the List of Impacted Tariff Sections described above (“Attachment III”);
4. A clean version of the conforming revisions to OATT sections included in the List of Impacted Tariff Sections described above (“Attachment IV”);
5. A blacklined version of the conforming revisions to OATT sections included in the List of Impacted Tariff Sections described above (“Attachment V”);
6. A clean version of OATT Section 6.1.9 – 6.1.15, effective from April 16, 2024 to October 31, 2025 (Attachment VI); and
7. A clean version of OATT Section 6.1.9 – 6.1.15, effective October 31, 2025 (Attachment VII).

### **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 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](http://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 New York Independent System Operator, Inc. respectfully requests that the Commission accept the attached, updated eTariff records.

Respectfully submitted,

/s/ Kimberly L. Osborne

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