

Attachment I

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

New York Independent System Operator, Inc.)
) Docket No. ER21-2460-0__
)

AFFIDAVIT OF ZACHARY T. SMITH

Mr. Zachary T. Smith declares:

1. I have personal knowledge of the facts and opinions herein and if called to testify could and would testify competently hereto.
2. The purpose of this Affidavit is to confirm the facts set forth in the NYISO’s Motion to Defer Effective Date of Previously Accepted Tariff Revisions and Request for Waiver (“NYISO Motion”).
3. I am currently the Director of Market Solutions for the New York Independent System Operator, Inc. (“NYISO”). My business address is 10 Krey Boulevard, Rensselaer, NY 12144. I received a Bachelor’s of Science degree in Computer Engineering from Union College, and a Master’s of Science degree in Engineering and Management Science from Union Graduate College (now Clarkson University).
4. I have been involved in the implementation and design of wholesale electricity markets at the NYISO for over seventeen (17) years. I originally joined the NYISO as a Price Validation Analyst in 2009. I joined the ICAP Market Operations department in 2013 and was promoted to Supervisor of ICAP Market Operations in 2015. I transitioned to the Manager of Capacity Market Design in 2017, was promoted to Senior Manager of Capacity and New Resource Integration Market Solutions in 2024, and then was promoted to Director of Market Solutions in 2025. In my roles as Senior Manager of Capacity and New Resource Integration Market Solutions and Director of Market Solutions, I oversaw the NYISO’s internal team responsible for the development of capacity market designs, including ensuring compliance with the NYISO Tariffs and Federal Energy Regulatory Commission (“Commission”) orders.
5. As the NYISO’s Director of Market Solutions, I oversee the Product Management and Market Design teams for the NYISO ICAP Market and New Resource Integration efforts,

including the integration of market design and implementation functions. Additionally, I have responsibility for the execution of NYISO's project portfolio including design and implementation of the NYISO's Energy, Capacity, and Ancillary Services¹ products. My responsibilities also include project execution of integrating new resource technologies into the NYISO's wholesale market structures, and research and development of mathematical models for use in developing and implementing market designs.

6. In my capacity as Manager of Capacity Market Design, I oversaw portions of the NYISO's development and later refinements to address the Commission orders of the NYISO's project plans to execute NYISO's FERC Order No. 2222 Distributed Energy Resource ("DER") Compliance Project, and of the NYISO's Hybrid Storage Resource ("HSR") Project. Currently, in my capacity as Director of Market Solutions, I oversee NYISO projects and associated allocation of resources to fulfill project needs, including the FERC Order No. 2222 Distributed Energy Resource Compliance effort and portions of the HSR Project.

7. Members of my staff and I worked on the NYISO's Order No. 2222 DER Project in 2024 ("Order 2222 Project") to identify the software systems that would need to be modified to support implementation of Order No. 2222 and to document the software modifications that Order No. 2222 requires. The Order 2222 Project identified requirements to modify the Operating Reserves software in the NYISO's market systems.

8. In parallel with the Order 2222 Project, my staff and I were engaged in the late stages of the software design of the HSR Project, at which time an overlap between the Order 2222 Project and the HSR Project was identified due to the changes required in the Operating Reserves software for both projects.

9. Members of my staff and I participated in the evaluation of the software modifications that are necessary for both the Order 2222 Project and the HSR Project to determine how to support both efforts moving forward. Due to the significant overlap in the Operating Reserves functionality required for both projects, it was determined it would be more efficient and effective to develop the software in conjunction rather than moving each effort forward sequentially.

10. Based on my experience with software projects and NYISO's software systems, coding two sets of modifications that overlap as closely as the modifications necessary to implement Operating

¹ Capitalized terms not otherwise defined in this submission shall have the meaning specified in the NYISO's Open Access Transmission Tariff ("OATT") or the Market Administration and Control Area Services Tariff ("Services Tariff").

Reserve functionality for HSR and Order 2222 DER sequentially is inefficient and would significantly increase the overall timeline and the amount of resources required. The NYISO relies on one set of resources (which include both NYISO Staff and employees of an outside consultant/software vendor) to code and test the Operating Reserves functionality. If the HSR and Order 2222 DER changes were to be developed sequentially the same set of resources would need to support two full cycles of the software development lifecycle instead of one.

11. The NYISO did not identify any additional significant risks to implementing the HSR and Order 2222 Operating Reserve changes together, compared to implementing the changes separately and sequentially.

12. The changes to the Operating Reserves functionality required to support FERC Order 2222 compliance and HSR are functionally very similar in design, and it was expected that the FERC Order 2222 Operating Reserves functionality would be built on top of the HSR Operating Reserves functionality. With the delay in HSR, it now makes sense to develop and deploy these two (2) sets of functionality in parallel.

13. With regard to the NYISO Motion, I provided guidance on the timeline and staffing requirements to complete the Order 2222 Project and the HSR Project, and the expected benefits of developing the Operating Reserve software for the projects together.

14. Order 2222 DER compliance is a more complex implementation than HSR, and major aspects of Order 2222 DER compliance functionality to support changes to the Operating Reserves functionality will be built in conjunction with the HSR functionality, due to the similarities in design.

15. I assisted with the preparation of and reviewed the facts stated in the NYISO's Motion. I have personal knowledge of and helped develop the factual statements contained in the NYISO's Motion. The factual statements set forth in the NYISO's Motion are true and correct to the best of my information, knowledge, and belief.

16. This concludes my affidavit.

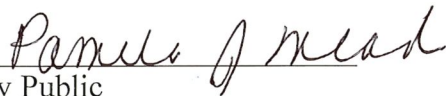
ATTESTATION

I am the witness identified in the foregoing affidavit. I have read the affidavit and am familiar with its contents. The facts set forth therein are true to the best of my knowledge, information, and belief.



Zachary T. Smith
April 15, 2026

Subscribed and sworn to before me
this 15 day of April, 2026


Notary Public

My commission expires: 6/24/2030

