

May 8, 2026

By Electronic Delivery

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

**Re: New York Independent System Operator, Inc., Compliance Filing; Docket  
Nos. ER26-570-000 and ER26-570-001**

Dear Secretary Reese:

On November 21, 2025, the New York Independent System Operator, Inc. (“NYISO”) submitted proposed revisions to its Open Access Transmission Tariff (“OATT”) and its Market Administration and Control Area Services Tariff (“Services Tariff”) to implement new market rules regarding operating, scheduling, and managing transmission service for the Champlain Hudson Power Express Merchant Transmission Facility (“MTF”), a 1,250 megawatt (MW) controllable direct current line connecting Quebec to New York City (“November 2025 Filing”). The November 2025 Filing proposed that Champlain Hudson Power Express LLC (the “MTF Provider”) would operate a limited-purpose Open Access Same-Time Information System (“OASIS”), distinct from the NYISO’s OASIS. On January 16, 2026, the Commission Staff issued a deficiency letter focused on whether the NYISO’s filing satisfied Parts 37 and 38 of the Commission’s Regulations,<sup>1</sup> which address OASIS requirements and North American Electric Standards Board Wholesale Electric Quadrant (“NAESB WEQ”) standards. On February 12, 2026, the NYISO submitted its response to the deficiency letter (“February 2026 Response”).<sup>2</sup> On April 13, 2026, the Commission issued an order accepting the NYISO’s proposed Tariff revisions effective March 16, 2026, and directing the NYISO to submit this “Compliance Filing” addressing language related to NAESB WEQ standards that the NYISO consented to incorporate into Section 41 of its OATT (“April 2026 Order”).<sup>3</sup> The NYISO submits this Compliance Filing in accordance with the April 2026 Order.

## **I. PROPOSED TARIFF REVISIONS**

In its February 2026 Response to the deficiency letter, the NYISO consented to clarifying Section 41 of its OATT to include MTF-specific language tracking the *pro forma* OATT language expressly referenced by subparts “i” and “ii” of Question One from the deficiency

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<sup>1</sup> 18 C.F.R. Parts 37 and 38 (2026).

<sup>2</sup> *New York Indep. Sys. Operator, Inc.*, Response to the Commission Staff’s January 16, 2026, Letter, Submission of Revised Tariff Records, and Request for Expedited Action, Docket No. ER26-570-001 (February 12, 2026).

<sup>3</sup> *New York Indep. Sys. Operator, Inc.*, Order Accepting Tariff Revisions Subject to Condition, 195 FERC ¶ 61,028 at P 37 and Ordering Paragraph (B) (April 13, 2026).

letter. The February 2026 Response proposed a compliance filing to revise OATT Section 41 to state that the MTF Provider would “post on [its] OASIS and its public website an electronic link to all rules, standards and practices that (i) relate to the terms and conditions of transmission service, (ii) are not subject to a North American Energy Standards Board (NAESB) copyright restriction, and (iii) are not otherwise included in this Tariff. The MTF Provider shall post on OASIS and on its public website an electronic link to the NAESB website where any rules, standards and practices that are protected by copyright may be obtained.” Consistent with the NYISO’s compliance proposal and the April 2026 Order, the language in quotation marks above has been added to the definition of MTF Provider OASIS in Section 41.1 of the OATT in the attached Tariff revisions.

To address concerns raised in the deficiency letter the NYISO further consented to revise Section 41 of the OATT to recite that “Terms and conditions regarding Open Access Same-Time Information System and Standards of Conduct are set forth in 18 C.F.R. Part 37 (Open Access Same-Time Information System and Standards of Conduct for Public Utilities) and 18 C.F.R. Part 38 of the Commission’s regulations (Business Practice Standards and Communication Protocols for Public Utilities) ~~(herein after referred to as “Business Practices”).~~” Consistent with the NYISO’s compliance proposal and the April 2026 Order, the language in quotation marks above has been added to the definition of MTF Provider OASIS in Section 41.1 of the OATT in the attached Tariff revisions. However, the NYISO did not include the stricken parenthetical (herein after referred to as “Business Practices”) because all of the references to “Business Practices” in Section 41 of the OATT are to the “MTF Provider Business Practices.” The stricken parenthetical was not necessary, and might cause confusion if it were included.

Finally, consistent with language that the Commission has repeatedly accepted in orders addressing the Cross-Sound Cable Company LLC’s compliance with the NAESB WEQ standards,<sup>4</sup> the NYISO consented to add language to Section 41 of its OATT listing the WEQ Version 4.0 standards and incorporating them by reference “to the extent that the requirements therein apply to the MTF Provider.” Consistent with the NYISO’s compliance proposal and the April 2026 Order, proposed conforming language has been added as Section 41.23 of the OATT in the attached Tariff revisions.

## **II. CORRECTION TO E-TARIFF FORMATTING OF OATT SECTIONS 41 AND 42**

The NYISO identified an eTariff coding error that inadvertently affected the placement of OATT Sections 41 and 42 in the NYISO OATT’s Table of Contents. Specifically, these sections were incorrectly coded as subordinate to a different tariff provision, which resulted in an erroneous level of indentation. Accordingly, the NYISO resubmits OATT Sections 41 and 42 to correct the eTariff coding error so that the Table of Contents is accurately reflected and the Commission’s records properly conform to the NYISO’s Tariff. All of the proposed changes to OATT Section 41 are described above. There are no changes to the language of Section 42 of the OATT proposed in this Compliance Filing.

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<sup>4</sup> See, e.g. *Cross-Sound Cable Company, LLC*, 126 FERC ¶ 61,297 at P 10 (2009) (“Based on these factors, Cross-Sound indicates that it has inserted conditional language indicating that “to the extent that these requirements therein apply to Cross-Sound Cable.”).

### **III. EFFECTIVE DATE**

The NYISO's February 2026 Response proposed a March 16, 2026 effective date for Section 41 of the OATT.<sup>5</sup> In the April 2026 Order, the Commission accepted the proposed OATT and Services Tariff revisions under Federal Power Act Section 205, to be effective March 16, 2026, subject to the NYISO's submittal of the instant compliance filing.<sup>6</sup> The NYISO, therefore, requests that the Commission accept its proposed compliance revisions to Section 41 of its OATT to become effective on March 16, 2026. Because it only proposes to correct an eTariff coding (formatting) error, the NYISO does not propose to modify the current February 16, 2026, effective date of Section 42 of its OATT.

### **IV. LIST OF DOCUMENTS SUBMITTED**

The NYISO submits the following documents with this filing letter:

1. A blacklined version of Section 41 of the NYISO OATT containing the proposed compliance modifications ("Attachment I");
2. A clean version of Section 41 of the NYISO OATT containing the proposed compliance modifications ("Attachment II"); and
3. Reformatted, clean versions of Sections 41 and 42 of the NYISO OATT (the reformatted version of OATT 41 includes the compliance modifications proposed in this filing) ("Attachment III").

### **V. SERVICE**

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, the New York State Public Service Commission, and the New Jersey Board of Public Utilities. The NYISO will also send an electronic link to this filing to the official representative of each of its customers, and each participant on its stakeholder committees. In addition, the NYISO will post a copy of this filing on its website at [www.nyiso.com](http://www.nyiso.com).

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<sup>5</sup> February 2026 Response at 19.

<sup>6</sup> April 2026 Order at Ordering Paragraph (A).

## VI. CONCLUSION

The NYISO respectfully requests that the Commission accept this compliance filing and requested effective date.

Respectfully Submitted,

/s/ Alex M. Schnell

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 8th day of May 2026.

/s/ Alexander Morse

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