

May 18, 2026

**Submitted Electronically**

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

**Re: *New York Independent System Operator, Inc.’s Proposed Tariff Amendments to Enhance Wholesale Energy Market Participation by Combined Cycle Gas Turbine Generators Equipped with Duct-Firing Capability;*  
Docket No. ER26-\_\_\_\_-000**

Dear Ms. Reese:

In accordance with Section 205 of the Federal Power Act<sup>1</sup> and Part 35 of the regulations of the Federal Energy Regulatory Commission (“Commission”), the New York Independent System Operator, Inc. (“NYISO”) submits proposed revisions to its Market Administration and Control Area Services Tariff (“Services Tariff”) to support the wholesale market participation opportunities for combined cycle gas turbine (“CCGT”) generators equipped with duct-firing capability (referred to hereafter as “CCGT Generators with Duct-Firing Capability”).<sup>2</sup>

The Services Tariff revisions proposed in this filing clarify and enhance the improvements for CCGT Generators with Duct-Firing Capability that the Commission accepted in July 2025.<sup>3</sup> The NYISO discovered the need for these proposed revisions during software development in 2025. The proposed revisions included with this filing are necessary to support the previously-accepted, but not-yet effective, rules and to improve compatibility with the NYISO’s dispatch framework. Implementing the revisions proposed herein, along with the

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<sup>1</sup> 16 U.S.C. § 824d.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning specified in the Services Tariff. Definitions for “Combined Cycle Gas Turbine (“CCGT”) Generator,” “Combined Cycle Gas Turbine (“CCGT”) Generator with Duct-Firing Capability,” “Limiting Participation Flag,” and “Participation Limit” were accepted by the Commission in an order issued on July 25, 2025, in Docket No. ER25-2382. The tariff revisions that NYISO filed, and the Commission accepted, in Docket No. ER25-2382 are not yet effective as the NYISO continues work on the software development required to implement the enhanced market participation opportunities for CCGT Generators with Duct-Firing Capability. The NYISO intends to make the previously accepted revisions effective on the same date as the incremental improvements proposed in this filing.

<sup>3</sup> See, Delegated Letter Order issued to the NYISO on July 25, 2025, Docket No. ER25-2382.

Services Tariff revisions accepted in July 2025, will allow the NYISO to dispatch CCGT Generators with Duct-Firing Capability that opt for use of the Limiting Participation Flag<sup>4</sup> in a manner that is compatible with existing dispatch framework and better aligns with the physical operating characteristics of these units.

The NYISO Management Committee unanimously approved the proposed revisions on December 17, 2025. The NYISO respectfully requests that the Commission: (1) issue an order accepting the proposed revisions on or before July 17, 2026 (*i.e.*, 60 days after filing); and (2) permit the proposed revisions to take effect as early as August 10, 2026, as discussed further in Section IV below.

## **I. List of Documents Submitted**

The NYISO submits the following documents with this filing letter:

1. A clean version of the proposed revisions to the Services Tariff (“Attachment I”); and
2. A blacklined version of the proposed revisions to the Services Tariff (“Attachment II”).

## **II. Background**

Some CCGT Generators are equipped with heat recovery steam generators (“HRSG”) with duct burners, which add additional heat to the steam cycle by burning fuel directly in the exhaust duct. The additional heat from the duct burners increases the steam flow to the steam turbine which increases the power generation output for the turbine. Typically, the operation of the duct burners is limited to the last 10% or less of the CCGT Generator’s output capability, and requires the gas turbine to be at or near its maximum output prior to activation. Operation within the duct-firing range, or transitioning from the standard operating range to the duct-firing range, may require a different ramp rate or a transition time compared to operation within the standard operating range.

The NYISO submitted proposed tariff revisions to the Commission on May 30, 2025, to introduce new and enhanced scheduling options for CCGT Generators with Duct-Firing Capability. This initial proposal was designed to allow CCGT Generators with Duct-Firing Capability to offer, and be scheduled for, Energy and Operating Reserves more accurately and

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<sup>4</sup> The Limiting Participation Flag, as accepted in July 2025, is an Operating Reserve and Regulation Service participation option that a CCGT Generator with Duct-Firing Capability may utilize, subject to technical validation, to limit its 10-Minute Spinning Reserves and Regulation Service Schedules to a Generator-specified limit.

efficiently based on their distinct operating capabilities (“2025 Filing”).<sup>5</sup> The 2025 Filing also allows capability from certain Resources that are currently unable to provide Operating Reserves to become eligible to offer such reserves capability. The Commission accepted the 2025 Filing in a delegated letter order issued on July 25, 2025, in Docket No. ER25-2382. In this filing, the NYISO proposes three improvements to the 2025 Filing.

#### **A. Real-Time Dispatch Improvements**

The tariff revisions in the NYISO’s 2025 Filing allow CCGT Generators with Duct-Firing Capability that have opted to use the Limiting Participation Flag to be scheduled for Real-Time Scheduled Energy either within the duct-firing operating range or within the non-duct-firing (or standard) operating range. Under the design accepted in the 2025 Filing, this determination could occur in each Real-Time Dispatch (“RTD”) interval, nominally every five minutes.

During the software development effort in 2025, the NYISO identified that allowing the RTD process to issue Real-Time Scheduled Energy basepoints that move a CCGT Generator with Duct-Firing Capability into or out of its duct-firing operating range across successive RTD intervals could result in infeasible dispatch instructions due to the physical transition requirements associated with duct-firing operation. By contrast, the Real-Time Commitment (“RTC”) process, which runs on a nominal 15-minute interval basis and is generally comprised of three RTD intervals, provides sufficient time for CCGT Generators with Duct-Firing Capability that have elected to use the Limiting Participation Flag to transition between the non-duct-firing and duct-firing operating ranges.

For CCGT Generators with Duct-Firing Capability that have elected to use the Limiting Participation Flag, the NYISO proposes to limit the Energy dispatch range available to the RTD software to the corresponding RTC run, *i.e.*, within their duct-firing operating range, or, at or below the breakpoint where the duct-firing operating range begins. The RTD software will not move a CCGT Generator with Duct-Firing Capability that has elected to use the Limiting Participation Flag into or out of duct-firing range unless the transition is explicitly determined by a RTC run and the Generator is notified of the upcoming transition by RTC. As a result, the three RTD runs corresponding to a typical RTC run will maintain the operating region established by the RTC, managing the cycling and feasibility for CCGT Generators with Duct-Firing Capability to move between the operating regions.

#### **B. Real-Time Dispatch – Corrective Action Mode Improvements**

The NYISO also proposes clarifying revisions that apply to CCGT Generators with Duct-Firing Capability that elect to use the Limiting Participation Flag during periods when the Real-

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<sup>5</sup> See, NYISO’s Federal Power Act Section 205 Filing, Proposed Tariff Amendments to Enhance Wholesale Energy Market Participation by Combined Cycle Gas Turbine Generators Equipped with Duct-Firing Capability, May 30, 2025, Docket No. ER25-2382.

Time Dispatch – Corrective Action Mode (“RTD-CAM”)<sup>6</sup> functionality is activated. Similar to the discussion above addressing improvements to RTD scheduling, these revisions are necessary to ensure that RTD-CAM schedules Energy in a feasible operating region, *i.e.*, the operating region that the Generator is in immediately prior to the RTD-CAM activation. If the unit is operating at or below its Participation Limit immediately prior to the activation of RTD-CAM, it will remain at or below its Participation Limit but could be moved towards its Participation Limit during the RTD-CAM activation. Likewise, if the unit is already operating above its Participation Limit immediately prior to the activation of RTD-CAM, it will remain above its Participation Limit and could be moved up to its Emergency Upper Operating Limit during the RTD-CAM activation. Additionally, the unit’s Energy schedule will be maintained in the same operating region for at least 15 minutes after the RTD-CAM activation is terminated to help manage cycling between operating regions.

### **C. Day-Ahead Market Scheduling Improvements**

For CCGT Generators with Duct-Firing Capability that elect to use the Limiting Participation Flag, eligibility to provide different market products depends on both the Resource’s instantaneous operating configuration and its ability and time required to transition between operating configurations. Regulation Service and 10-minute Operating Reserves require dispatchable response within prescribed response times and, therefore, may only be provided when the Resource is operating at or below its Participation Limit. Energy and 30-minute Operating Reserves may be provided either below or above the Resource’s Participation Limit, because entry into the duct-firing range can be achieved within the applicable response time.

The Day-Ahead Market ideal pass does not consider the discrete operating configuration of a CCGT Generator with Duct-Firing Capability that has elected to use the Limiting Participation Flag; therefore, it cannot independently determine whether a feasible combination of Energy and Operating Reserves would rely on operation below or above such Resource’s Participation Limit. As a result, the ideal pass could produce schedules that are mathematically feasible but physically infeasible for these Resources. Physically feasible scheduling requires identifying the instantaneous operating configuration (at or below the Participation Limit, or above it) and issuing schedules that respect product eligibility associated with that configuration.

Today, CCGT Generators are subject to the prices and schedules determined in the ideal pass of the Day-Ahead Market. This approach can lead CCGT Generators with Duct-Firing Capability that have opted to use the Limiting Participation Flag to receive infeasible schedules. The physical pass, on the other hand, produces Day-Ahead schedules that respect the operating

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<sup>6</sup> See Services Tariff Section 2.18. Definition of “Real-Time Dispatch–Corrective Action Mode (“RTD-CAM”)”: A specialized version of the Real-Time Dispatch software that will be activated when it is needed to address unanticipated system conditions. *See also* Services Tariff Section 4.4.3, specifying that RTD-CAM will have the ability to commit certain Resources.

rules applicable to CCGT Generators with Duct-Firing Capability that have elected to use the Limiting Participation Flag.

For CCGT Generators with Duct-Firing Capability that have opted to use the Limiting Participation Flag, the NYISO proposes to have their final Day-Ahead Market schedules determined in the physical pass of the Day-Ahead Market rather than the ideal pass. Day-Ahead Market prices for all CCGT Generators will continue to be determined by the ideal pass of the Day-Ahead Market. The proposal subjects CCGT Generators with Duct-Firing Capability that have opted for use of the Limiting Participation Flag to the scheduling decisions of the physical pass that respects their physical operating characteristics. The proposed improvements are consistent with the Real-Time Market treatment of the operating characteristics of CCGT Generators with Duct-Firing Capability that have elected to use the Limiting Participation Flag. This proposal also provides for similarity with the Day-Ahead Market scheduling and pricing treatment of Fast Start Resources.<sup>7</sup>

These proposed Day-Ahead Market scheduling enhancements would help to more efficiently and effectively utilize the feasible operating capability of CCGT Generators with Duct-Firing Capability that elect to use the Limiting Participation Flag while respecting the NYISO's existing market scheduling and dispatch framework.

### **III. Description of Proposed Revisions to the Services Tariff**

The NYISO proposes revisions to Services Tariff Sections 4 and 17 to reflect the three concepts discussed above.

#### **A. Services Tariff Section 4**

In Services Tariff Section 4.4.3, the NYISO proposes to replace the phrase “higher or lower than its physical basepoint” with “to or below its Participation Limit.” This change will allow the NYISO to move CCGT Generators with Duct-Firing Capability that have elected to use the Limiting Participation Flag within its duct-firing operating range as opposed to holding it at a static output level.

Also, in Services Tariff Section 4.4.3.1.2, the NYISO proposes clarifications to support the dispatch of CCGT Generators with Duct-Firing Capability that have elected to use the Limiting Participation Flag during periods when the RTD-CAM program is activated. If the Generator is operating at or below its Participation Limit at the time of the RTD-CAM activation, the Generator may be directed to increase its production up to and/or sustain output at its Participation Limit. If the Generator is operating above its Participation Limit at the time of the RTD-CAM activation, the Generator may be directed to increase its production up to and/or sustain output at its Emergency Upper Operating Limit.

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<sup>7</sup> In the Day-Ahead Market and Real-Time Market, Fast Start Resources are subject to prices determined in the ideal pass and schedules determined in the physical pass.

## **B. Services Tariff Section 17**

In Services Tariff Section 17.1.2.1.1, the NYISO proposes to specify that each RTD run will dispatch CCGT Generators with Duct-Firing Capability that have opted to use the Limiting Participation Flag within the operating range determined by the corresponding RTC run. This section also provides that such Generators will be dispatched within the operating range determined by RTD-CAM for at least 15 minutes, if the RTD-CAM determines the operating zone to be different than the last RTC run.

In Services Tariff Section 17.1.2.1.3, the NYISO proposes to add language clarifying the scheduling rules that apply to CCGT Generators with Duct-Firing Capability that have elected to use the Limiting Participation Flag during RTD-CAM activations. The available operating range of such Generators during RTD-CAM activations is determined based on their operating level immediately prior to the RTD-CAM activation. If such a unit is operating at or below its Participation Limit at the time of the RTD-CAM activation, the Generator's output will be maintained at or below its Participation Limit but the unit may be directed to increase its output up to its Participation Limit. If the Generator was operating above its Participation Limit at the time of the RTD-CAM activation, its output will be maintained above its Participation Limit but the Generator may be directed to increase its output up to its Emergency Upper Operating Limit.

In Services Tariff Section 17.1.3, the NYISO proposes to specify that final Day-Ahead Market schedules for CCGT Generators with Duct-Firing Capability that have elected to use the Limiting Participation Flag are calculated from Pass 6 of the Security Constrained Unit Commitment software, *i.e.*, the physical pass.

## **IV. Effective Date**

The NYISO respectfully requests that the Commission issue an order accepting the tariff revisions proposed in this filing on or before July 17, 2026 (*i.e.*, sixty days after submission of this filing) with a flexible effective date. The NYISO anticipates that the proposal described herein, as well as the enhancements previously approved by the Commission in Docket No. ER25-2382, may be implemented as early as August 10, 2026.<sup>8</sup> The NYISO cannot propose a more precise effective date until the software changes necessary to implement the proposed tariff revisions are finished, adequately tested, and the software deployment is scheduled. The NYISO proposes to submit a compliance filing at least two weeks prior to the proposed effective date that will specify the date on which the revisions will take effect. Consistent with Commission precedent, the subsequent submittal will provide adequate notice to the Commission and Market Participants of the implementation date for the revisions proposed herein.<sup>9</sup>

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<sup>8</sup> The NYISO currently intends to implement the proposed revisions between August 1, 2026 and December 31, 2026, subject to Commission acceptance of this filing and the proposed prior notice requirements discussed further in this Section IV.

<sup>9</sup> See, e.g., *New York Indep. Sys. Operator, Inc.*, 106 FERC ¶ 61,111 at P 10 (2004); Docket No. ER 11-2544-000, *New York Indep. Sys. Operator, Inc.*, Letter Order at 1 (February 10, 2011); Docket No. ER15-485-000,

## **V. Stakeholder Approval**

The Management Committee unanimously approved the proposed revisions to the Services Tariff on December 17, 2025. The NYISO Board of Directors approved the proposed tariff revisions on January 13, 2026.

## **VI. Correspondence**

All communications and correspondence concerning this filing should be directed to:

Robert E. Fernandez, Executive Vice President, General Counsel, & Chief Compliance Officer

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## **VII. Service**

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 send an electronic copy of this filing to the New York State Public Service Commission and the New Jersey Board of Public Utilities. The NYISO will also post a complete copy of this filing on its website at [www.nyiso.com](http://www.nyiso.com).

### **VIII. Conclusion**

The NYISO respectfully requests that the Commission issue an order on or before July 17, 2026, accepting the tariff revisions proposed in this filing without modification, with a flexible effective date as further described in Section IV.

Respectfully submitted,

/s/ James H. Sweeney

James H. Sweeney, Senior Attorney  
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cc: Janel Burdick  
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