

August 31, 2026

By Electronic Delivery

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.*; Notice of Delayed
Effective Date and Compliance Filing, Docket No. ER25-1998-00_**

Dear Secretary Reese:

On April 18, 2025, the New York Independent System Operator, Inc. (“NYISO”) filed proposed revisions (“April 2025 Filing”)¹ to its Market Administration and Control Area Services Tariff (“Services Tariff”) to implement additional operating reserve procurement requirements throughout the New York Control Area (“NYCA”) to account for anticipated forecast uncertainties in both the Day-Ahead Market and Real-Time Market (*i.e.*, “Uncertainty Reserves Requirements”). On July 2, 2025, the Federal Energy Regulatory Commission (“Commission”) issued an order accepting the NYISO’s proposed Uncertainty Reserves Requirements (“July 2025 Order”).²

The July 2025 Order directed the NYISO to submit a subsequent filing to specify the effective date for the tariff revisions.³ On August 19, 2026, the NYISO submitted a compliance filing to provide notice of the expected effective date of September 2, 2026, for the tariff revisions accepted by the July 2025 Order (“August 19 Notice”). The NYISO submits this filing to inform the Commission of a need to delay the effective date for such tariff revisions.

I. Notice of Delayed Effective Date

In the August 19 Notice, the NYISO committed to inform the Commission if conditions arose that required a delay of the anticipated effective date.⁴ The NYISO submits this additional notice to inform the Commission that an effective date of September 2, 2026 is no longer achievable.

¹ Docket No. ER25-1998-000, *New York Independent System Operator, Inc.*, Proposed Tariff Amendments to Establish the Process to Procure Uncertainty Reserves (April 18, 2025).

² *New York Indep. Sys. Operator, Inc.*, 192 FERC ¶ 61,021 (2025).

³ *Id.* at P 1.

⁴ August 19 Notice at 2.

During its ongoing comprehensive testing and validation of the enabling software, the NYISO identified an unanticipated issue. The NYISO is expeditiously working to resolve this matter but must postpone the effective date for the tariff revisions accepted by the July 2025 Order to engage in further software development and comprehensive software testing.

The NYISO expects to require approximately two weeks for the development of a resolution, further testing, and validation of the enabling software. As a result, the NYISO currently anticipates implementing the revisions to the Services Tariff accepted by the July 2025 Order on September 16, 2026.⁵ For the Day-Ahead Market, the Services Tariff revisions will be incorporated into the execution of the Day-Ahead Market occurring on September 17, 2026 for the September 18, 2026 market day. For the Real-Time Market, the Services Tariff revisions will introduce the real-time Uncertainty Reserves Requirements calculation on September 17, 2026, with Uncertainty Reserves Requirements being incorporated into the entire dispatch day of September 18, 2026, for the first time.

II. Documents Submitted

The NYISO respectfully submits the following with this filing letter:

1. A clean version of the revisions to the Services Tariff accepted by the July 2025 Order with an effective date of September 16, 2026 (“Attachment I”).

III. Service

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

IV. Conclusion

The NYISO respectfully submits this filing to notify the Commission of the delayed effective date for the tariff revisions accepted by the July 2025 Order.

Respectfully submitted,

/s/ James H. Sweeney

James H. Sweeney

Senior Attorney

New York Independent System Operator, Inc.

⁵ Should the NYISO determine that it will be unable to implement these tariff revisions on September 16, 2026, it will promptly notify its Market Participants and the Commission.

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Douglas Roe

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 31st day of August 2026.

/s/ Meghan Liguori

Meghan Liguori
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