NEW YORK INDEPENDENT SYSTEM OPERATOR
10 Krey Boulevard ♦ Rensselaer, NY 12144

December 16, 2013

By Electronic Delivery

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: *New York Independent System Operator, Inc.*, Proposed Tariff Revisions Regarding Interconnection Process Improvements, Docket No. ER14-____

Dear Secretary Bose:

In accordance with Section 205 of the Federal Power Act[1] and Part 35 of the Federal Energy Regulatory Commission's ("Commission") regulations,[2] the New York Independent System Operator, Inc. ("NYISO") respectfully submits proposed revisions to the interconnection procedures set forth in Attachment X to the NYISO Open Access Transmission Tariff ("OATT") (Standard Large Facility Interconnection Procedures), and Attachment Z to the NYISO OATT (Small Generator Interconnection Procedures).[3]

The NYISO is proposing changes to Attachments X and Z as part of an ongoing effort to improve upon its interconnection study process. These proposed changes to NYISO's interconnection procedures relate to the evaluation of increases in the energy capability of existing facilities. Currently such increases trigger the requirement that a developer submit a new Interconnection Request, regardless of how minimal the increase might be. By revising the tariff to permit limited increases in energy capability of existing facilities without requiring a new Interconnection Request, this proposal eliminates unnecessary interconnection studies. It thereby adds efficiencies to the NYISO's interconnection process and provides added flexibility to existing facilities interconnected to the New York State Transmission System. The NYISO's proposed revisions to Attachments X and Z also include a number of ministerial revisions. All of the proposed revisions are further described below in Section IV of this letter.

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[1] *See* 16 U.S.C. § 824d (2000).

[2] 18 C.F.R § 35 *et seq.* (2009).

[3] Capitalized terms not otherwise defined in this letter have the meaning set forth in Attachments X and Z of the NYISO's Open Access Transmission Tariff ("OATT"), as amended by the enclosed proposed revisions to Attachments X and Z of the OATT.

I. Documents Submitted

1. This filing letter;

2. A clean version of the proposed revisions the NYISO's OATT ("Attachment I"); and

3. A blacklined version of the proposed revisions to the NYISO's OATT ("Attachment II").

II. Background

The rights and obligations of all Large Facility project Developers and Small Generating Facility Interconnection Customers (collectively, "Developers"),[4] Transmission Owners, and the NYISO with respect to interconnecting new generation and merchant transmission projects are set forth in Attachments S, X, and Z to the NYISO's OATT. Attachment X to the OATT contains the procedures for processing FERC-jurisdictional interconnections of Large Generating Facilities and Merchant Transmission Facilities. Attachment Z to the OATT contains the procedures for processing FERC-jurisdictional interconnections of Small Generating Facilities.

Attachments X and Z set forth the detailed procedures for the identification and cost allocation of System Upgrade Facilities required for a project to reliably interconnect to the system and thereby provide Energy Resource Interconnection Service ("ERIS"). ERIS is basic interconnection service that allows a Developer to interconnect its facility to the New York State Transmission System or Distribution System in accordance with the NYISO Minimum Interconnection Standard to enable the New York State Transmission System or Distribution System to receive electric energy from the facility. In addition to ERIS, Developers may also elect Capacity Resource Interconnection Service ("CRIS"). Unlike ERIS, CRIS is the interconnection service that allows a Developer to interconnect its facility to the New York State Transmission System or Distribution System in accordance with the NYISO Deliverability Interconnection Standard, which allows participation in the NYISO's Installed Capacity market to the extent of the facility's deliverable capacity. The NYISO's proposed tariff revisions that are the subject of this filing relate only to ERIS, not CRIS.[5] Specifically, the tariff revisions - explained in detail in Section IV, below - relate to an existing facility's ability to increase its existing ERIS.

Attachments X and Z of the OATT currently require a Developer to submit an Interconnection Request not only to interconnect new Large Facilities and Small Generating

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[4] While "Developer" is a tariff-defined term referring to a project developer for a Large Facility (versus a Small Generating Facility), for ease of reference, this filing letter uses the term "Developers" to refer to both Large Facility project developers and Small Generating Facility project developers.

[5] Requests to increase CRIS are already explicitly addressed in Attachments S, X and Z of the NYISO's OATT.

Facilities (collectively "facilities"), but also "to increase the capacity of, or make a material modification to the operating characteristics of, an existing [facility] that is interconnected with the New York State Transmission System or with the Distribution System."[6] The current tariff language does not provide for any flexibility with respect to the requirement that a Developer submit a new Interconnection Request for an increase in the capability to an existing facility. For example, a facility that is evaluated in the NYISO interconnection process as a 100 megawatt ("MW") project, and subsequently executes an Interconnection Agreement for such facility, but that as-built, is capable of 101 MW, triggers the requirement that it submit a new Interconnection Request and be studied under Attachment X for the additional 1 MW that it is capable of generating. This requires three consecutive interconnection studies under Attachment X for the incremental 1 MW, only one of which - the Interconnection Feasibility Study - may be waived upon consent of the parties.[7]

Experience has revealed that it is not uncommon for facilities' as-built capability to exceed the estimated capability of yet-to-be-constructed facilities. As a result, as-built capability can slightly exceed the MW level that was evaluated in the NYISO's interconnection study process. This is particularly true for facilities that propose to incorporate new technologies. Experience also has shown that existing generators, even long existing generators, on occasion are able (in periodic required field tests) to demonstrate a level of capability that is slightly higher than previously demonstrated in recent history without having made any material modifications to equipment. Although infrequent, such increases in capability may occur for various reasons such as after completion of a maintenance cycle, or the replacement of like-in-kind equipment. Upon notification that a facility seeks to increase its existing ERIS capability, the NYISO requires the Developer to submit a new Interconnection Request for the incremental output, even when the increase in existing ERIS has negligible or no impact on system reliability under the Minimum Interconnection Standard.

This is only a requirement for existing facilities and, consistent with Commission guidance, is not applied to facilities in the interconnection queue that have not yet crossed the "existing facility" threshold.[8] Facilities that have not reached that "existing facility" stage may request an increase in ERIS capability and, if determined non-material under Section 30.4.4.3 of Attachment X, such increase is permitted.[9] The difference in treatment for the two types of

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[6] *See* Attachment X, Sections 30.1 and 30.14; *see also,* Attachment Z, Section 32.5.

[7] *See* Attachment X, Section 30.6.

[8] Based on Commission guidance, the NYISO has deemed a facility an "existing facility" if it either (1) has completed all required NYISO interconnection studies and has an effective Interconnection Agreement; or (2) is fully constructed, synchronized to the grid; and has an executed Interconnection Agreement. *See, e.g., 330 Fund I, L.P. v. New York Independent System Operator, Inc.*, 121 F.E.R.C. P61,001, *Order Denying Complaint* at P 32 (2007) ; *Midwest Independent Transmission System Operator, Inc.*, 125 F.E.R.C. P61,210, *Order Granting Rehearing, In Part* at P 15 (2008).

[9] *See* Attachment X, Section 30.4.4.3.

facilities stems from the language in the *pro forma* definition of Interconnection Request, which only speaks to increases in the capacity of *existing* Facilities.

The existing requirement that *any* increase in an existing facility's ERIS capability triggers the requirement that the facility submit a new Interconnection Request has proven to be difficult to manage in the NYISO interconnection process and has added procedural requirements to existing facilities, with associated added cost and burden, that both the NYISO and its stakeholders seek to lessen. The NYISO is cognizant of the urging of former Commissioner Kelly, in her concurring opinion in an order accepting an Interconnection Agreement, encouraging an examination of the need for a *de minimis* exception related to increases in generation capacity.[10] The NYISO and its stakeholders have conducted a thorough evaluation of this need and, while desiring to retain the ability to evaluate the materiality of changes in existing facilities, have worked collaboratively to develop such an exception, subject to certain very specific, well-delineated limitations, described in detail in Section IV, below.[11]

III. The Independent Entity Variation Standard

The NYISO's proposed revisions to Attachments X and Z would modify tariff language that the Commission adopted in Order Nos. 2003 and 2006, or their successors as part of the *pro forma* interconnection procedures.[12] The Commission has accepted other modifications and improvements to the NYISO interconnection procedures,[13] recognizing that where changes to *pro forma* interconnection procedures "are clarifying and/or ministerial in nature and/or NYISO has supplied sufficient justification," such modifications are acceptable under the "independent entity variation" standard.[14] The Commission has explained that under this standard, "the Commission will review the proposed variations to ensure they do not provide an unwarranted

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[10] *See Midwest Indep. Transmission Sys. Operator, Inc.*, 124 FERC P61,277 at P62, *Order Accepting Agreements* (2008).

[11] In developing these tariff revisions, the NYISO and its stakeholders also viewed this as an opportunity to propose certain limited ministerial revisions - primarily formatting - to language in Attachments X and Z. All of the proposed revisions were approved by the NYISO's stakeholders, without opposition, and are described in Section IV, below.

[12] *Standardization o/Generator Interconnection Agreements and Procedures*, Order No. 2003, FERC Stats. & Regs. 31,146 (2003), *order on re'g*, Order No. 2003-A, FERC Stats. & Regs. 31,160 (2004), *order on reh'g*, Order No. 2003-B, FERC Stats.& Regs. 31,171 (2004), *order on reh'g*, Order No. 2003-C, FERC Stats. & Regs. 131,190 (2005), *affirmed sub nom. Nat'I Ass'n of Regulatory Util. Com'rs v. FERC,* 475 F.3d 1277 (D.C. Cir. 2007); *Standardization of Small Generator Interconnection Agreements and Procedures*, Order No. 2006, 70 Fed. Reg. 34190 (June 13, 2005), 111 FERC ¶ 161,220 (2005), *order on reh'g*, Order No. 2006-A, 113 FERC ¶ 61,195, 70 Fed. Reg. 71760 (Nov. 30, 2005).

[13] *See, e.g.*, *New York Independent System Operator, Inc*., 135 FERC ¶ 51,014 (2011); *New York Independent System Operator, Inc*., 124 FERC ¶ 61,238 (2008).

[14] *New York Independent System Operator, Inc*., 124 FERC ¶ 61,238 at PP 17-18.

opportunity for undue discrimination or produce an interconnection process that is unjust and unreasonable."[15]

The revisions to Attachment X and Z that are proposed herein are fully justified under the Commission's "independent entity variation" standard because they have been approved by the NYISO's stakeholders after an extensive and open process, have been endorsed by the NYISO's independent Board of Directors, and, as discussed herein, revise tariff provisions that have proven unnecessarily prescriptive. Meetings held over the course of four (4) months resulted in a consensus among stakeholders on the amendments proposed in this filing. These tariff revisions are intended to improve upon the NYISO's current interconnection process. The NYISO and its stakeholders believe that the proposed tariff modifications can provide considerable improvement to the existing process by eliminating studies that are not needed. The NYISO therefore respectfully request that the Commission approve these tariff revisions under the "independent entity variation" standard.

IV. Description of the Proposed Tariff Modifications

A. Overview

As described in more detail in the following sections, NYISO is proposing tariff changes to implement *de minimus* criteria for determining when increases in the capability of existing generating facilities are required to undergo the NYISO interconnection study procedures.

The NYISO respectfully submits that the Commission's rationale supporting the current *pro forma* requirement - the requirement that any increase in existing capability triggers a new Interconnection Request - does not apply in the NYISO's interconnection process due to unique regional variations in the NYISO's markets. In its post-Order 2003 and post-Order 2006 decisions reinforcing the requirement that any increase whatsoever in a unit's capability requires a new Interconnection Request, the Commission has emphasized two factors. First, the Commission has opined that "[i]nsisting that parties file new pro forma LGIAs when electing to increase generation capacity, as already required, provides consistency and eliminates confusion."[16] Second, the Commission has emphasized its concern that "an increase in the amount of power the Generating Facility will produce should be treated as significant because it is an important change in one of the most fundamental characteristics of a Generating Facility."[17]

With respect to the first concern regarding the need to provide consistency and eliminate confusion, the NYISO's proposed tariff revisions were designed to address these very concerns. By revising its interconnection procedures to allow for a *de minimis* increase to be permitted in

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[15] *See* Id. at P18.

[16] *See* Id. at P11.

[17] *Midwest Independent Transmission System Operator, Inc.*, 125 F.E.R.C. P61,210, *Order Granting Rehearing, In Part* at P16 (2008).

certain limited circumstances, and apprising stakeholders of such tariff revisions, the NYISO does not anticipate creating any confusion; to the contrary, the NYISO believes this will eliminate confusion and improve consistency. Currently, increases are permitted prior to the facility being deemed an "existing facility." Yet once the facility becomes an "existing facility," an increase in unit output is not permitted. A facility must submit an Interconnection Request for any increase. This "zero tolerance" is inconsistent with the tolerance for increases that are requested prior to a facility crossing the "existing facility" threshold.

With respect to the second concern, the Commission has noted that, "[a]n increase in generating capacity is generally a significant change (material modification) to an interconnection request that requires new studies and a new interconnection request."[18] The Commission has further expressed its concern that, "[h]ow much power a Generating Facility will produce is critical to the very nature of the Generating Facility, and it is reasonable to treat a change to that characteristic as a new Interconnection Request."[19] Balancing the Commission's concern regarding the critical nature of an increase in output is the fact that NYISO's proposal only allows limited increases within a specified *de minimis* threshold, thereby addressing any reliability concerns. Moreover, due to unique variations in the NYISO, increases in capability do not pose the reliability risk that they might in other regions. This is true for two reasons: (1) the NYISO does not have a firm reservation system for access to the New York State Transmission System; and (2) in operating its Energy markets, NYISO commits and dispatches generation in a manner that maintains reliability, including reducing a unit's output level, or even de-committing the unit if necessary to maintain the reliability of the transmission system (*i.e.,* if the dispatch of an existing facility at a MW level higher than its existing level would create reliability issues, the NYISO's scheduling and dispatch software would not dispatch the unit at increased output.)[20]

The standard for evaluating a unit electing ERIS under the NYISO's interconnection process is the Minimum Interconnection Standard, which does not analyze whether the facility will have deliverability across the New York State Transmission System (commonly referred to as "energy deliverability issues") or whether/how it will be dispatched. Those are all issues that will be solved through the NYISO's commitment and dispatch software. Rather, the Minimum Interconnection Standard, defined below, focuses on the reliability of the physical interconnection of the facility to the transmission system.

> Minimum Interconnection Standard shall mean the reliability standard that must be met by any Large Generating Facility, or a

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[18] *See Midwest Independent Transmission System Operator, Inc.*, 122 FERC P61,019, *Order Accepting Revised Interconnection Agreement* at P16 (2008).

[19] *See Midwest Independent Transmission System Operator, Inc.*, 125 F.E.R.C. P61,210 at P16.

[20] The NYISO's Security Constrained Unit Commitment ("SCUC") is the process through which the NYISO prepares a generation schedule for the following day through the operation of a computer algorithm that minimizes the total bid production cost of energy while observing various operational parameters. Among such operational parameters are local and bulk system reliability. The NYISO uses a similar process for the Real-Time Market.

> Merchant Transmission Facility, proposing to connect to the New York State Transmission System or to the Distribution System. The Standard is designed to ensure reliable access by the proposed project to the New York State Transmission System or to the Distribution System, as applicable. The Standard does not impose any deliverability test or deliverability requirement on the proposed interconnection.[21]

Because of the narrow scope of the Minimum Interconnection Standard, together with the fact that the NYISO's commitment and dispatch software dispatches generation in a manner that maintains reliability, the Commission's concerns regarding the potential impact of unevaluated increases in generator output are not as applicable in the NYISO as they might be in other regions. For the above reasons, the proposed modifications to the *pro forma* described in Sections IV.B. and IV.C., below are justified in the NYISO's OATT.

B. Revisions to the Definition of Interconnection Request

The NYISO's proposal to address this issue begins with the definition of Interconnection Request. The proposed tariff revisions add the qualifying term, "materially" in the definition of Interconnection Request. With this change, the only increases in capacity that would trigger a new Interconnection Request would be those that "*materially* increase the capacity of …an existing [facility]." (emphasis added). This revision is reflected in Sections 30.1, 30.14, and 32.5 - all of the sections of the NYISO OATT in which the definition of Interconnection Request appears.

C. Clear Delineation of Permissible Increases and Associated Modifications to Establish Existing ERIS Levels

The above-described revision to the *pro forma* definition of Interconnection Request would permit increases in output without triggering a new Interconnection Request as long as such increases are not "material." To clarify what is meant by a "*material* increase" that would trigger a new Interconnection Request, the NYISO proposes revisions to Sections 30.3 and 32.1. The proposed language added to these sections details the limited circumstances under which an increase in energy output would be permitted, and thereby ensures that material modifications to existing facilities are still subject to thorough evaluation in the interconnection study process.

The proposed language in Sections 30.3 and 32.1 would provide that an increase in an existing facility's capability is not a "material increase" as long as it is associated with non-material equipment changes (or no equipment change) and the increase is within the following thresholds:

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[21] *See* Attachment X, Sections 30.1 and 30.14; *see also,* Attachment Z, Section 32.5.

- for Large Facilities, no more than 10 MW or 5% of the existing ERIS level, whichever is greater; or

- for Small Generating Facilities, no more than 2 MW of the existing ERIS level up to a new total at or below 20 MW.

The proposed language added to these sections then proceeds to explain what it meant by term "existing ERIS," which is the baseline from which any increase, now or in the future is measured.[22] The proposed language provides that an existing facility's existing ERIS level is the greater of:

(i) the existing Large Facility's CRIS level determined as a facility pre-dating Class Year 2007 pursuant to Section 25.9.3.1 of Attachment S of the OATT, if applicable ("grandfathered CRIS"); or

(ii) the final maximum summer megawatt electrical output studied for ERIS in the NYISO's interconnection process for the existing Large Facility;

If neither of the above is applicable, the NYISO proposes that the existing ERIS be the value reflected in the facility's interconnection agreement or other applicable documentation governing the facility's interconnection.

The justification for the above criteria is as follows:

For existing facilities that had received grandfathered CRIS pursuant to Section 25.9.3.1 - by far the overwhelming majority of the New York fleet of generators - their CRIS level was set, pursuant to Section 25.9.3.1 of Attachment S, at the highest Dependable Maximum Net Capability ("DMNC")[23] achieved by the facility during a five year period. The NYISO concluded that the highest DMNC achieved by this universe of existing facilities made the most sense to rely on as the "high water mark" for the facilities' maximum energy output, and therefore the baseline that is referred to in this proposal as "existing ERIS." For the subset of existing facilities with grandfathered CRIS that were going through the NYISO's interconnection process at the time the "grandfathering" provisions in Section 25.9.3.1 went into effect, the NYISO proposes that their existing ERIS be the higher of their grandfathered CRIS or the final maximum summer MW level at which they were evaluated in the NYISO's interconnection studies.

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[22] For example, an existing facility's that has an "existing ERIS" of 100 MW, but as-built, is capable of 110 MWs, could request an increase in 10 MW over its existing ERIS. If, two year later, that facility does routine maintenance, and, as a result, is capable of 112 MW, the NYISO would evaluate the additional 2 MW as part of a twelve MW increase above the existing ERIS of 100 MW.

[23] DMNC is defined as "The sustained maximum net output of a Generator, as demonstrated by the performance of a test or through actual operation, averaged over a continuous time period as defined in the ISO Procedures." *See* Section 1 of the NYISO OATT.

For newer facilities that were not eligible for grandfathered CRIS under Section 25.9.3.1, the most appropriate measure of existing ERIS is the final maximum summer MW level at which they were evaluated in the NYISO's interconnection studies. If the existing facility is a temperature sensitive unit, the maximum capacity of which varies based on ambient temperature, the NYISO's proposal provides that the increase in existing capacity will be measured based on the largest increase from the existing capacity to the proposed capacity at the same temperature, *i.e.*, at the same temperature along the maximum megawatt electrical output versus temperature curves.

For facilities that do not have a grandfathered CRIS level but that were not subject to the NYISO's interconnection study requirements,[24] the NYISO proposes a third criteria: that the existing ERIS be the value reflected in the facility's interconnection agreement or other applicable documentation governing the facility's interconnection.

Below is a detailed description of the specific tariff amendments necessary to implement this proposal.

1. Language the NYISO Proposes to Add to Section 30.3

The NYISO proposes to add the following language to Section 30.3 to clarify how the proposal would apply to Large Facilities:

> An increase in the capacity of an existing Large Facility is a material increase for purposes of this Section 30.3.1 unless the increase (a) is not associated with any equipment changes or is associated with equipment changes determined by the NYISO to be non-material; and (b) is an increase in the Large Facility's existing ERIS level that is equal to or less than ten (10) megawatts or five (5) percent, whichever is greater. For purposes of this Section 30.3.1, the existing ERIS level of an existing Large Facility is (a) the greater of (i) the existing Large Facility's CRIS level determined as a facility pre-dating Class Year 2007 pursuant to Section 25.9.3.1 of Attachment S of the OATT, if applicable; or (ii) the final maximum summer megawatt electrical output studied for ERIS in the NYISO's interconnection process for the existing Large Facility; or (b) if neither (a)(i) nor (a)(ii) are applicable, the existing ERIS level is the value reflected in the Large Facility's interconnection agreement or other applicable documentation governing the Large Facility's interconnection. If the existing Large Facility is a temperature sensitive unit, the maximum capacity of which varies based on

[24] An example of this very limited universe of facilities might be a load modifier that did not participate in the capacity market until recently. Such units may not have had DMNC tests during the five-year DMNC window under Section 25.9.3.1 and therefore have zero CRIS. If they were pre-existing at the time the *pro forma* interconnection procedures went into effect and were not subject to the NYISO's interconnection study requirements under the applicable transition mechanisms, they also would not have a summer MW level at which they were studied in the NYISO interconnection process.

ambient temperature, the increase in existing capacity will be measured based on the largest increase from the existing capacity to the proposed capacity at the same temperature, *i.e.*, at the same temperature along the maximum megawatt electrical output versus temperature curves.

2. Language the NYISO Proposes to Add to Section 32.1

The NYISO proposes to add the following language to Section 32.1 to clarify how the proposal would apply to Small Generating Facilities:

An increase in the capacity of an existing Small Generating Facility is a material increase for purposes of this Section 32.1.3 unless the increase (a) is not associated with any equipment changes or is associated with equipment changes determined by the NYISO to be non-material; and (b) is an increase in the Small Generating Facility's existing ERIS level that is equal to or less than two (2) megawatts and which provides for a total output of the Small Generating Facility of no more than twenty (20) megawatts. For purposes of this Section 32.1.3, the existing ERIS level of an existing Small Generating Facility is (a) the greater of (i) the existing Small Generating Facility's CRIS level determined as a facility pre-dating Class Year 2007 pursuant to Section 25.9.3.1 of Attachment S of the OATT, if applicable; or (ii) the final maximum summer megawatt electrical output studied for ERIS in the NYISO's interconnection process for the existing Small Generating Facility; or (b) if neither (a)(i) nor (a)(ii) are applicable, the existing ERIS level is the value reflected in the Small Generating Facility's interconnection agreement or other applicable documentation governing the Small Generating Facility's interconnection. If the existing Small Generating Facility is a temperature sensitive unit, the maximum capacity of which varies based on ambient temperature, the increase in existing capacity will be measured based on the largest increase from the existing capacity to the proposed capacity at the same temperature, *i.e.,* at the same temperature along the maximum megawatt electrical output versus temperature curves.

D. Additional Ministerial Revisions and Tariff Clean Up

The NYISO's proposed revisions to Attachments X and Z involve modifications to several sections of the NYISO tariff, including the lengthy appendices included in Attachments X and Z of the OATT. In order to ensure consistency throughout these sections of the OATT, and to streamline formatting of *pro forma* agreements contained in the appendices to Attachment X and Z - Sections 30.14 and 32.5 - a number of minor and ministerial changes are required. Also, upon review of these sections of the OATT, a few typographical errors and other minor error were discovered that require modification for accuracy and internal consistency. These minor, clarifying, and ministerial corrections - specified in the chart below - are necessary to clarify, and ensure the internal consistency and accuracy of the proposed tariff modifications.

Tariff Section	Modification
ATTACHMENT X	
Attachment X § 30.3	Replaced "Large Generating Facility or Merchant Transmission Facility" with "Large Facility," which is a defined term in Section 30.1 defined as, "either a Large Generating Facility or a Merchant Transmission Facility."[25]
Attachment X § 30.14, Appx. 2, Appx. 3 and Appx. 5	Corrected section references in articles 7.4 and 7.5 of the *pro forma* Interconnection Feasibility Study Agreement in Appendix 2, the *pro forma* Interconnection System Reliability Impact Study Agreement in Appendix 3, and the *pro forma* Optional Interconnection Study Agreement in Appendix 5. Articles 7.4 and 7.5 of these *pro forma* agreements refer to sections of the study agreements, not sections of Attachment X; therefore the references should not be preceded by the number "30" (Attachment X is Section "30" of the NYISO OATT).
Attachment X § 30.14, Appx. 4	Added additional spaces for text on the data form to be provided with the *pro forma* Interconnection Facilities Study Agreement
Attachment X § 30.14, Appx. 6	Corrected a grammatical error by adding the word "in" to the definition of Byway in the Standard Large Generator Interconnection Agreement in Appendix 6
ATTACHMENT Z	
Attachment Z § 32.5 Appx. 1	Changed the brackets that appear in the definitions of "Class Year" and "Class Year Project" to parentheticals
Attachment Z § 32.5 Appx. 6, Appx. 7 and Appx. 8	Removed unnecessary brackets from language in the "whereas" clauses in the *pro forma* Feasibility Study Agreement in Appendix 6, the *pro forma* System Impact Study Agreement in Appendix 7, and the *pro forma* Facilities Study Agreement in Appendix 8 Removed a stray bracket from Article 6.0 of the *pro forma* Facilities Study Agreement in Appendix 8 Added additional spaces for text on the data form to be provided with the *pro forma* Facilities Study Agreement in Appendix 8

[25] *See* Attachment X, Section 30.1.

Tariff Section	Modification
ATTACHMENT Z (continued)	
Attachment Z § 32.5 Appx. 9	Deleted the entry for a subheading in the table of contents for the Standard Small Generator Interconnection Agreement in Appx. 9 Replaced a semicolon with a colon in Article 1.6 Corrected the section reference in Article 1.9 Capitalized "operator" in the defined term "Affected System Operator" used in Article 5.3 Corrected the parenthetical numbers used to distinguish three clauses in Article 6.2
GLOBAL	
Global	Various spacing and formatting edits (*e.g.,* making indents in *pro forma* agreements consistent; removing stray bold and underline formatting; deleting extra spaces and extra lines between text) Replaced "NYISO" with "New York Independent System Operator, Inc." in the signature blocks in the *pro forma* agreements

V. Requested Effective Date

The NYISO requests that the Tariff revisions proposed herein become effective on February 14, 2014, which is sixty days from the date of this filing.

VI. Requisite Stakeholder Approval

The tariff revisions proposed in this filing were the product of discussions with stakeholders in the NYISO's Transmission Planning Advisory Subcommittee beginning in July, 2013. These proposed changes to the OATT were approved unanimously by the Operating Committee on October 17, 2013 and by the Management Committee (with one abstention) on October 30, 2013. The NYISO Board of Directors also approved the filing of these proposed.

VII. Communications and Correspondence

All communications and services in this proceeding should be directed to:

Robert E. Fernandez, General Counsel
Raymond Stalter, Director of Regulatory Affairs
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* Persons designated for receipt of service.

VIII. Service

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

Respectfully submitted,

/s/ Sara B. Keegan
Sara Branch Keegan
Counsel for the
New York Independent System Operator, Inc.

cc: Michael A. Bardee
Gregory Berson
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