

December 10, 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.'s Proposed Tariff
Integration of Variable Energy Resources, Order No. 764;
Notice of Submission of Tariff Revisions Discussed in Compliance Filing
Submitted on November 12, 2013
Docket No. ER14-385-000**

Dear Ms. Bose:

The New York Independent System Operator, Inc. ("NYISO") submitted a compliance filing to the Federal Energy Regulatory Commission ("Commission") in response to the *Order on Integration of Variable Energy Resources* ("Order No. 764") in this docket on November 12, 2013 ("Compliance Filing"). The Compliance Filing demonstrated that NYISO's existing market and Tariff rules, supplemented by a Tariff revision to be formally submitted in a Federal Power Act ("FPA") Section 205 filing in early December 2013, produce a solution that is equivalent or superior to the requirements of Order No. 764 for the New York region.

Consistent with the discussion on pages 5 to 7 of the NYISO's Compliance Filing, the NYISO submitted a FPA Section 205 filing to the Commission on December 6, 2013 in Docket No. ER14-552-000. The FPA Section 205 filing proposes to revise Section 4.4.1.2.2 of the NYISO's Market Administration and Control Area Services Tariff to permit import offers and export bids at Variably Scheduled Proxy Generator Buses¹ to contain different MW quantities and different prices, for each quarter of an upcoming hour.

Respectfully submitted,

/s/ Alex M. Schnell

Alex M. Schnell

James H. Sweeney, Attorney

New York Independent System Operator, Inc.

¹ Capitalized terms that are not defined in this filing have the meaning ascribed to them in the NYISO's Market Administration and Control Area Services Tariff.

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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 10th day of December, 2013.

By: /s/ John C. Cutting

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