



October 16, 2014

**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. and PJM Interconnection, L.L.C.*,  
Compliance Filing Setting Tariff Effective Date for Previously Accepted Tariff  
Revisions for Coordinated Transaction Scheduling;  
Docket No. ER14-2236

Dear Ms. Bose:

On June 20, 2014, the New York Independent System Operator, Inc. (“NYISO”) and PJM Interconnection, L.L.C. (“PJM”) jointly filed revisions to the Joint Operating Agreement (“JOA”) between NYISO and PJM with the Federal Energy Regulatory Commission (“Commission”) for implementation of Coordinated Transaction Scheduling (“CTS”) at the border between NYISO and PJM (“June Filing”).<sup>1</sup> The JOA revisions proposed in the June Filing added a new defined term to the JOA, CTS Interface Bid, and added a table to Schedule A to the JOA identifying the interfaces where NYISO and PJM will be authorized to consider CTS Interface Bids. The Commission accepted the June Filing in an order issued on August 15, 2014 (“August Order”) and directed the NYISO and PJM to submit a compliance filing at least two weeks in advance of the date CTS will become operational and the JOA revisions will be effective.<sup>2</sup> The NYISO and PJM are collectively referred to herein as “the ISOs,” even though PJM is a Regional Transmission Organization.

The purpose of this joint compliance filing, which includes PJM’s certificate of concurrence, is to set the effective date for JOA revisions that the Commission has already considered and accepted for filing. The ISOs hereby provide notice to the Commission and to Market Participants that they propose to make the JOA revisions effective on November 4, 2014; the date on which they plan to implement CTS.

In accordance with the Commission’s August Order, the ISOs submit this compliance filing to make the JOA revisions effective on November 4, 2014. The revised JOA that was

---

<sup>1</sup> The NYISO/PJM JOA is Section 35 (Attachment CC) to the NYISO Open Access Transmission Tariff.

<sup>2</sup> *New York Independent System Operator, Inc. and PJM Interconnection, L.L.C.*, Unpublished Letter Order, Docket No. ER14-2236 (August 15, 2014).

submitted with the June Filing is re-submitted with this compliance filing. The only additional modification the ISOs make is to set a November 4, 2014 effective date; no other new revisions are proposed. This filing is also one of the “second set of compliance filings to set the date on which CTS will go into effect at [NYISO’s] border with PJM” that the NYISO discussed in its October 8, 2014 compliance filings in Docket Nos. ER12-701-002, ER14-552-001 and ER14-2552-001.

As explained above, the ISOs intend to activate CTS at the NYISO and PJM border on November 4, 2014. However, if any unforeseen circumstances prevent the ISOs from activating CTS on that date: (1) the NYISO will promptly notify the Commission and Market Participants in Docket No. ER14-552; and (2) PJM will promptly notify the Commission and Market Participants in Docket No. ER14-623. These docket numbers correspond to each ISO’s original Federal Power Act Section 205 filings to enable CTS at the border between NYISO and PJM.<sup>3</sup>

## **I. Documents Submitted**

1. This filing letter;
2. A clean version of the previously submitted revisions to the NYISO/PJM JOA with a November 4, 2014 effective date (“Attachment I”); and
3. PJM’s certificate of concurrence (“Attachment II”).

## **II. Service**

### **A. NYISO 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, to all parties listed on the Commission’s official service list in Docket No. ER14-2236 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](http://www.nyiso.com).

### **B. PJM Service**

PJM has served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically. In accordance with the Commission’s regulations,<sup>4</sup> PJM will post a copy of this filing to the FERC Filings section of its Web site, located at <http://www.pjm.com/documents/ferc-manuals/ferc-filings.aspx>, with a specific link to the newly filed document, and will send an e-mail on the same date as this

---

<sup>3</sup> NYISO’s *Proposed Tariff Amendments to Implement External Coordinated Transaction Scheduling with PJM Interconnection, LLC*, Docket No. ER14-552 (December 6, 2013); PJM *Interconnection, L.L.C.*, Docket No. ER14-623 (December 13, 2013).

<sup>4</sup> See 18C.F.R §§ 35.2(e) and 385.2010(f)(3).

filing to all PJM Members and all state utility regulatory commissions in the PJM Region<sup>5</sup> alerting them of the filing and its availability on PJM's Web site. PJM also serves the parties listed on the Commission's official service list for this docket. Notwithstanding the foregoing, if the document is not immediately available by using the referenced link, it will be available within 24 hours of the filing. A copy of this filing will also be available on the Commission's eLibrary Web site located at <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

### **III. Conclusion**

The ISOs respectfully submit this filing to notify the Commission that they intend to implement the JOA revisions on November 4, 2014, and to request that the Commission accept their conforming e-Tariff effective dates for filing without modification.

Respectfully submitted,

/s/ James H. Sweeney

James H. Sweeney

Attorney

New York Independent System Operator, Inc.

/s/ Steven Shparber

Steven Shparber

Counsel

PJM Interconnection, L.L.C.

Craig Glazer

Vice President, Federal Government Policy  
PJM Interconnection, L.L.C.

cc: Michael A. Bardee  
Gregory Berson  
Anna Cochrane  
Jignasa Gadani  
Morris Margolis  
Michael McLaughlin  
David Morenoff  
Daniel Nowak

---

<sup>5</sup> PJM already maintains updates and regularly uses e-mail lists for all PJM members and affected state commissions.