

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

New York Independent System Operator, Inc.)

**Docket Nos. ER08-1281-005
ER08-1281-006**

**MOTION FOR MODIFICATION TO REPORTING OBLIGATION OF THE
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

Pursuant to Rules 212 of the Commission’s Rules of Practice and Procedure,¹ the New York Independent System Operator, Inc. (the “NYISO”) respectfully submits this *Motion for Modification to Reporting Obligation* (“Motion”) with the Federal Energy Regulatory Commission’s (“FERC” or “Commission”). This Motion requests that the current semiannual informational filing obligation in this Docket be modified to an annual informational filing obligation.

On December 30, 2010, the Commission issued an *Order on Rehearing and Compliance* in Docket No. ER08-1281 (“December 2010 Order”)² requiring the NYISO to submit semiannual informational reports, in collaboration with its neighboring ISOs and RTOs, NERC and other market participants, commencing one year after the implementation of interface pricing reform and congestion management/market-to-market coordination.

The December 2010 Order required:

“[O]ne year after the implementation of interface pricing reform and congestion management/market-to-market coordination, and

¹ 18 C.F.R. § 385.212 (2013).

² *New York Independent System Operator, Inc.*, 133 FERC ¶ 61,276 PP 33 and ordering paragraph “D” (2010).

every six months thereafter until the market initiatives are fully implemented, we require the NYISO, in collaboration with its neighboring RTO/ISOs, NERC and other market participants, to submit a report, as an information filing, addressing: (i) the effects of the reforms on reducing congestion that results from loop flows and the costs associated with mitigating congestion; (ii) the effects of the implementation of the enhanced interregional transaction coordination initiative; and (iii) recommendations and analyses as to whether the buy-through congestion proposal is required, and if so, when it should be implemented.”³

The NYISO submitted the first *Broader Regional Markets Informational Report* in this Docket on March 19, 2014 (“March Report”). The March Report was jointly developed with PJM Interconnection, L.L.C. (“PJM”), the Midcontinent Independent System Operator, Inc. (“MISO”), and the Ontario Independent Electricity System Operator (“IESO”), (collectively, the “ISOs and RTOs”).

The NYISO, with the support of the ISOs and RTOs, respectfully requests that the Commission amend the informational filing obligation to require annual reports to the Commission. Postponing the next informational filing until March 20, 2015 will provide necessary time for the ISOs and RTOs to develop a more substantive update for the Commission than the ISOs and RTOs will be able to provide in September 2014. Several initiatives described in the March Report (PJM/NYISO Coordinated Transaction Scheduling, for example) will require the majority of 2014 to complete. Therefore, the status will not change significantly from the March Report to a September 2014 reporting date. Also, gaining additional operating experience with the features that entered service in 2012-2013, and the features being implemented in 2014, will allow the ISOs and RTOs to better understand their impact before providing another update to the Commission.

³ *New York Independent System Operator, Inc.*, 133 FERC ¶ 61,276 at P 33 (2010) (original footnotes omitted).

The NYISO will send an electronic link to this filing to the official representative of each party to this proceeding, 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.

The NYISO respectfully requests that the Commission change the semiannual reporting requirement imposed in the December 2010 Order to an annual reporting requirement.

Respectfully submitted,

/s/ James H. Sweeney

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Dated: April 25, 2014

cc: Michael Bardee
Gregory Berson
Anna Cochrane
Jignasa Gadani
Morris Margolis
Michael McLaughlin
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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 25th day of April, 2014.

By: /s/ John C. Cutting

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