

January 7, 2016

**Submitted Electronically**

Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E.  
Washington, D.C. 20426

Re: Response to Deficiency Letter in Docket No. ER16-168-000

Dear Ms. Bose:

The New York Independent System Operator, Inc. (“NYISO”) and its external Market Monitoring Unit (“MMU”), Potomac Economics, Ltd., jointly submit this response to the Federal Energy Regulatory Commission’s (the “Commission’s”) deficiency letter issued in this proceeding on December 28, 2015 (“Deficiency Letter”). The Deficiency Letter directs the NYISO to respond to five enumerated questions. Responses to each of the Commission’s questions are provided in Attachment I to this letter.

In addition to the attached responses to the Commission’s questions, the NYISO resubmits its proposed Tariff revisions as Attachment II to this letter, and proposes to change the effective date from December 28, 2015 to an unspecified effective date. The NYISO hereby requests that the Tariff revisions proposed in its October 29, 2015 filing be permitted to become effective on the date of the Commission’s issuance of an order ruling on the NYISO’s proposed Tariff revisions. The NYISO respectfully requests that the Commission issue an order ruling on the NYISO’s proposed Tariff revisions within 60 days of the date of this response.

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](http://www.nyiso.com).

The NYISO and the MMU respectfully request that the Commission (i) accept this response to the Deficiency Letter, (ii) accept the NYISO's October 29, 2015 filing in this proceeding, including the proposed Tariff revisions, without modification, effective on the date the Commission issues its order, and (iii) act on the NYISO's proposed Tariff revisions within 60 days.

Respectfully submitted,

/s/ James H. Sweeney  
James H. Sweeney, Attorney  
New York Independent System  
Operator, Inc.

/s/ Pallas LeeVanSchaick  
Pallas LeeVanSchaick  
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Potomac Economics, Ltd.

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