

November 29, 2016

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.*, Docket No. ER16-1213-00\_; Compliance  
Filing Establishing an Effective Date for Behind-the-Meter Net Generation Tariff  
Revisions

Dear Secretary Bose:

In accordance with the requirements of the Federal Energy Regulatory Commission's ("Commission") May 17, 2016 order in this proceeding,<sup>1</sup> the New York Independent System Operator, Inc. ("NYISO") submits this filing to provide notice of the expected effective date for the tariff amendments integrating Behind-the-Meter Net Generation Resources (the "BTM:NG Tariff Revisions").<sup>2</sup> In this filing, the NYISO also advises the Commission of certain matters related to the transition of existing resources participating in the wholesale markets (*e.g.*, Generators and Special Case Resources ("SCRs")) to Behind-the-Meter Net Generation Resources ("BTM:NG Resources").

**I. Documents Submitted**

1. This filing letter;
2. A clean version of the accepted revisions to the Market Administration and Control Area Services Tariff ("Attachment I"); and
3. A clean version of the accepted revisions to the Open Access Transmission Tariff ("Attachment II").

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<sup>1</sup> *New York Indep. Sys. Operator, Inc.*, 155 FERC ¶ 61,166 (2016).

<sup>2</sup> New York Indep. Sys. Operator, Inc. March 17, 2016 Proposed Amendments to the NYISO Open Access Transmission Tariff and Market Administration and Control Area Services Tariff to Incorporate Behind-the-Meter Net Generation Resources into the NYISO's Energy, Ancillary Services and Capacity Markets ("March 17 Filing").

## **II. Notice of Effective Date**

In compliance with the May 17, 2016 order in this proceeding, the NYISO hereby provides notice to the Commission that it expects to fully implement the accepted revisions for the December 13, 2016 market day. Attachments I and II provide clean versions of the relevant tariff revisions with an effective date of December 13, 2016.<sup>3</sup>

## **III. Transition of Existing Wholesale Resources**

As explained in the BTM:NG Tariff Revisions, the NYISO is working with existing wholesale Generators<sup>4</sup> that will qualify as BTM:NG Resources to facilitate an orderly transition from the Generator's current wholesale market participation as a "traditional" Generator to a BTM:NG Resource (or other type of resource as appropriate).<sup>5</sup> The NYISO anticipates that the transition will be completed to permit participation in the Installed Capacity market beginning in March 2017.<sup>6</sup>

The NYISO is also working to ensure that existing SCRs intending to transition to BTM:NG Resources satisfy all obligations incurred as a SCR. The NYISO anticipates transitioning existing SCRs to BTM:NG Resources to allow participation in the Installed Capacity Market beginning in March 2017. Affected resources will continue to have certain SCR performance testing, data reporting, and other obligations related to their participation in the SCR program prior to transitioning to a BTM:NG Resource until the completion of the Winter 2016-2017 Capability Period on April 30, 2017.

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<sup>3</sup> Should the NYISO determine that it will be unable to implement the Behind-the-Meter Net Generation tariff revisions for the December 13, 2016 market day, it will promptly notify its Market Participants and the Commission.

<sup>4</sup> Capitalized terms not otherwise defined herein shall have the meaning specified in Section 2 of the NYISO Market Administration and Control Area Services Tariff and Section 1 of the NYISO Open Access Transmission Tariff.

<sup>5</sup> In its March 17 Filing, the NYISO advised the Commission that it was aware of two existing Generators participating in the NYISO's wholesale markets that serve behind-the-meter Load. March 17 Filing at 2 n.5. As explained in the March 17 Filing, the NYISO will work to transition these resources to become BTM:NG Resources, or another type of resource as appropriate, upon the effective date of the BTM:NG Tariff Revisions.

<sup>6</sup> "Traditional" Generators that sell Unforced Capacity for the months of December 2016 and January - February 2017, and are transitioning to BTM:NG Resources, are required fulfill their Installed Capacity market obligations for the months of December 2016 and January – February 2017. These transitioning resources will thereafter have the opportunity to sell Unforced Capacity as BTM:NG Resources beginning with the February 2017 ICAP Auctions for delivery starting in March 2017.

#### **IV. Communications and Correspondence**

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

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#### **V. Service**

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).

#### **VI. Conclusion**

The New York Independent System Operator, Inc. respectfully requests that the Commission accept this compliance filing and the proposed effective date of December 13, 2016 for the tariff revisions referenced herein.

Respectfully submitted,

/s/ Gregory J. Campbell

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