# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

New York Independent System Operator, Inc. ) Docket No. RM07-14-000

## MOTION FOR EXTENSION OF FILING DEADLINE OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.

In accordance with Rules 212 and 2008 of the Commission's Rules of Practice and Procedure,<sup>1</sup> the New York Independent System Operator, Inc. ("NYISO") respectfully requests that the Commission grant a 32 day extension of the filing deadline for Federal Energy Regulatory Commission ("FERC") Form No. 714, Annual Electric Balancing Authority Area and Planning Area Report. The filing is currently due on June 1, 2017.<sup>2</sup> The NYISO requests a 32 day extension to submit its Form No. 714 filing not later than July 3, 2017 for the reasons set forth below.

There is good cause for granting the requested extension. As discussed in greater detail below, the NYISO has encountered unexpected technical difficulties with accessing and utilizing the Form No. 714 submission software. NYISO Staff and FERC Staff are discussing how NYISO can address technical difficulties that it has encountered. Granting the requested extension will provide the NYISO the time it requires to address the technical difficulties, complete Form No. 714, verify the data tables, and obtain the necessary approvals prior to its electronic submission of Form No. 714.

The NYISO respectfully requests that the standard five-day period for answering motions for extension of time established under Rule 213(d)(1)(i) apply to this filing.<sup>3</sup>

o e.i .it. § 505.215(**u**)(1)(1) (2015).

<sup>&</sup>lt;sup>1</sup> 18 C.F.R. §§ 385.212 and 2008 (2015).

<sup>&</sup>lt;sup>2</sup> 18 C.F.R. §141.51(b).

<sup>&</sup>lt;sup>3</sup> 18 C.F.R. § 385.213(d)(1)(i) (2015).

#### I. Communications

Communications and correspondence regarding this filing should be directed to:

Robert E. Fernandez, General Counsel
Raymond Stalter, Director of Regulatory Affairs
\*Alex M. Schnell, Assistant General Counsel/
Registered Corporate Counsel
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
Tel: (518) 356-6000
Fax: (518) 356-4702
rfernandez@nyiso.com
rstalter@nyiso.com
aschnell@nyiso.com

\* Person designated for service.

### **II.** Request for Extension of Filing Deadline

Rule 2008 authorizes the Commission to extend any deadline, including one imposed by a Commission compliance directive, before it expires if a requesting party demonstrates that there is "good cause" to do so. For the reasons set forth below, the NYISO respectfully submits that there is good cause to grant its requested 32 day extension of time.

Although the NYISO has previously, on multiple occasions, submitted Form 714 electronically using the FERC submission software without issue, the submission application is currently producing error messages that are preventing the NYISO from accessing the full set of Form 714 tables and inputting the required data for calendar year 2016. Error logs have been provided to FERC Information Technology Staff for analysis. In spite of ongoing efforts by FERC Staff and NYISO, it appears that the NYISO's issues will not be resolved prior to the June 1, 2017 filing deadline. FERC Staff has advised the NYISO to file this request for extension. Although NYISO has requested a 32 day extension, it is prepared to complete and submit Form 714shortly after the technical software issue is resolved.

Finally, the NYISO requests that the Commission apply the standard five day answer period for motions for extensions of time and act expeditiously to grant the requested extension as soon as possible thereafter.

#### III. Conclusion

WHEREFORE, for the foregoing reasons, the NYISO respectfully requests that the Commission grant a 32 day extension to the Form 714 filing deadline so that the NYISO may submit its filing no later than July 3, 2017.

Respectfully submitted,

/s/ Alex M. Schnell

Alex M. Schnell
Assistant General Counsel/
Registered Corporate Counsel
New York Independent System Operator, Inc.
10 Krey Blvd.
Rensselaer, New York 12144
aschnell@nyiso.com

Date: June 1, 2017

Michael Bardee cc: Nicole Buell Anna Cochrane Kurt Longo David Morenoff Daniel Nowak Parkinson Larry Alan Phung J. Arnold Quinn Douglas Roe Kathleen Schnorf Jamie Simler Gary Will