

July 10, 2017

By Electronic Delivery

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Response to Deficiency Letter; Resubmission of Proposed Tariff Revisions with
a Revised Effective Date; Docket No. ER17-1310-____**

Dear Ms. Bose:

The New York Independent System Operator, Inc. (“NYISO”) submits this response to the deficiency letter issued by the Federal Energy Regulatory Commission (“Commission”) in this proceeding on May 24, 2017 (“Deficiency Letter”). The Deficiency Letter directed the NYISO to provide additional information required for the Commission to address the NYISO’s March 27, 2017, filing (“March 2017 Filing”)¹ of a regional cost allocation methodology pursuant to Section 31.5.5.4.1 of its Open Access Transmission Tariff (“OATT”). The methodology was prescribed by the Public Policy Requirement that resulted in the identification by the New York Public Service Commission of the AC Transmission Public Policy Transmission Needs, for which the NYISO must solicit and evaluate solutions. The NYISO submits the requested information in Attachment I to this letter.

The NYISO understands that this response to the Deficiency Letter constitutes an amendment to its March 2017 Filing and that a new filing date will be established pursuant to *Duke Power Co.*, 57 FERC ¶ 61,215 (1991). The NYISO respectfully re-files clean and marked versions of the pending tariff amendments submitted with its March 2017 Filing as Attachments II and III to this letter, respectively, and proposes to change the effective date from May 26, 2017, to an unspecified effective date. The NYISO hereby requests that the tariff revisions proposed in the March 2017 Filing be permitted to become effective on the date of the Commission’s issuance of an order ruling on the proposed revisions.²

The filing will be posted on the NYISO’s website at www.nyiso.com. In addition, the NYISO will e-mail an electronic link to this filing to the official representative of each party to this proceeding, to 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.

¹ *New York Independent System Operator, Inc.*, Docket No. ER17-1310-000 (March 27, 2017).

² *See New York Independent Operator, Inc.*, 154 FERC ¶ 61,111 (2016) at PP 14, 39 (accepting effective date as date of Commission’s order, as requested in NYISO response to deficiency letter).

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Please feel free to contact me if your office has any additional questions.

Respectfully submitted,

/s/ Carl F. Patka

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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 10th day of July 2017.

/s/ Joy A. Zimmerlin

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