

November 26, 2019

## **By Electronic Delivery**

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

## Re: Response to Deficiency Letter in Docket No. ER19-2276-\_\_\_\_

Dear Ms. Bose:

The New York Independent System Operator, Inc. ("NYISO") submits this response to the Federal Energy Regulatory Commission's ("Commission") second deficiency letter issued in this proceeding on October 30, 2019 ("Second Deficiency Letter"). The Second Deficiency Letter directs the NYISO to respond to seven enumerated questions regarding the NYISO's June 27, 2019 filing in this proceeding (the "June 27 Filing"), as amended on September 18, 2019.<sup>1</sup> 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 submits a clean version of the NYISO's Open Access Transmission Tariff Section 1.1 that was submitted with the June 27 Filing.<sup>2</sup> The NYISO requests that the Commission issue an order accepting all of the tariff revisions proposed in the June 27 Filing 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 State Public Service Commission, and to the

<sup>&</sup>lt;sup>1</sup> New York Indep. Sys. Operator, Inc., Proposed Tariff Revisions Regarding Establishment of Participation Model for Aggregations of Resources, Including Distributed Energy Resources, and Proposed Effective Dates, Docket No. ER19-2276 (June 27, 2019) ("June 27 Filing").

<sup>&</sup>lt;sup>2</sup> Second Deficiency Letter at n. 4. For purpose of this filing, Attachment II contains the tariff section, assigned the same effective date as that requested in the June 27 Filing.

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New Jersey Board of Public Utilities. In addition, the complete filing will be posted on the NYISO's website at <u>www.nyiso.com</u>.

The NYISO respectfully requests that the Commission (i) accept this response to the Deficiency Letter, and (ii) act on the NYISO's proposed tariff revisions within 60 days.

Respectfully submitted,

<u>/s/ Gregory J. Campbell</u> Gregory J. Campbell Attorney New York Independent System Operator, Inc. 10 Krey Boulevard Rensselaer, NY 12114

cc: Anna Cochrane Cecelia Coffey James Danly Jignasa Gadani Jette Gebhart Kurt Longo John C. Miller David Morenoff Daniel Nowak Larry Parkinson Douglas Roe Frank Swigonski Gary Will

## **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 26<sup>th</sup> day of November 2019.

/s/ Joy A. Zimberlin

Joy A. Zimberlin New York Independent System Operator, Inc. 10 Krey Blvd. Rensselaer, NY 12144 (518) 356-6207