

March 18, 2020

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. and PJM Interconnection, L.L.C.*,  
Docket No. ER19-2282-00\_; New York Independent System Operator, Inc.  
Compliance Filing to Establish Effective Date for Tariff Revisions Implementing  
Revised Entitlement Rules for Market-to-Market Coordination

Dear Secretary Bose:

In accordance with the requirements of the Letter Order that was issued in this proceeding on August 28, 2019,<sup>1</sup> and the Notice of Extension of Time that was issued in the above Docket on January 23, 2020, the New York Independent System Operator, Inc. (“NYISO”) submits this filing to provide notice of an expected effective date of April 7, 2020 for the revisions to Section 6 of Schedule D to the Joint Operating Agreement (“JOA”) between the NYISO and PJM Interconnection, L.L.C. (“PJM”).<sup>2</sup> The revisions were developed to implement a streamlined and improved method of determining and calculating Market-to-Market (“M2M”) Entitlements.<sup>3</sup> The NYISO requested a flexible effective date because it needed to make software improvements in order to implement the new M2M Entitlement rules.

On pages 15 and 16 of their June 28, 2019, transmittal letter in this Docket, the NYISO and PJM explained:

The NYISO proposes to submit a compliance filing at least two weeks in advance of an effective date that the RTOs mutually agree to, specifying the date on which the revisions to Section 6 of Schedule D to the JOA that are included in this filing will take effect. Consistent with Commission precedent, [footnote omitted] the NYISO’s submission of a compliance filing will provide adequate notice to the Commission, to PJM, to participants in this Docket, and to the NYISO’s Market

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<sup>1</sup> *New York Independent System Operator, Inc. and PJM Interconnection, L.L.C., Proposed Revisions to NYISO-PJM Joint Operating Agreement* at 2 (August 28, 2019) (“Letter Order”).

<sup>2</sup> The JOA is set forth in Section 35.23 of the NYISO’s Open Access Transmission Tariff.

<sup>3</sup> Capitalized terms not otherwise defined herein have the meaning specified in Section 35.2.1 of the JOA.

Participants of the implementation date for the changes to the M2M Entitlement rules. To ensure that all of PJM's stakeholders are aware of the change, PJM hereby commits to promptly serve the PJM Members and all state utility regulatory commissions in the PJM Region by posting the filing electronically.

The Letter Order accepted the proposal for a flexible effective date between December 1, 2019 and January 31, 2020 for the changes to implement a streamlined and improved method of determining and calculating M2M Entitlements.<sup>4</sup> The January 23, 2020 Notice of Extension of Time extended the permitted implementation deadline to be no later than April 30, 2020. The NYISO has confirmed the proposed effective date with PJM, and hereby notifies the Commission and its Market Participants that PJM and NYISO intend to implement the amendments to Section 6 of Schedule D to the JOA on April 7, 2020.

### **I. Documents Submitted**

1. This filing letter; and
2. A clean version of the accepted revisions to Section 6 of Schedule D to Section 35.23 of the NYISO's OATT with an effective date of April 7, 2020 ("Attachment I").

PJM's Certificate of Concurrence to the JOA changes was submitted to the Commission as Attachment V to the joint filing that initiated this Docket on June 28, 2019.

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

In compliance with the Letter Order, the NYISO hereby provides notice to the Commission that it expects to implement the revisions to Section 6 of Schedule D to the JOA on April 7, 2020. Should the NYISO and/or PJM determine that they will not be able to implement the enhancements to the M2M Entitlement rules on April 7, 2020, then the NYISO and PJM will promptly notify the Commission and their Market Participants.

### **III. 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).

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<sup>4</sup> Letter Order at 2.

Consistent with the commitment quoted above, PJM has informed the NYISO that it will promptly serve this filing on the PJM Members and all state utility regulatory commissions in the PJM Region by posting the filing electronically.

#### **IV. Conclusion**

The New York Independent System Operator, Inc. respectfully requests that the Commission accept this compliance filing.

Respectfully submitted,

/s/ Alex M. Schnell

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