

June 30, 2010

**By Electronic Delivery**

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

**Re: Compliance Filing of the New York Independent System Operator, Inc.,  
Docket No. RM01-5-000**

Dear Secretary Bose:

In compliance with the Federal Energy Regulatory Commission's ("Commission") September 19, 2008 Order on Electronic Tariff Filings ("Order No. 714"),<sup>1</sup> the New York Independent System Operator, Inc. ("NYISO") respectfully submits the baseline filing of its Tariffs: the Open Access Transmission Tariff ("OATT") and the Market Administration and Control Area Services Tariff ("Services Tariff"), collectively, "NYISO Tariffs."

**I. Files Submitted**

1. This transmittal letter;
2. A PDF version of the NYISO Tariffs;
3. An XML version of the NYISO Tariffs;
4. An OATT Table of Contents; and
5. A Services Tariff Table of Contents.

**II. Tariff Description and Justification**

In this filing the NYISO is placing both of its tariffs under one Tariff ID. In accordance with the Commission's April 21, 2010 letter order<sup>2</sup> and the subsequent tariff naming discussion

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<sup>1</sup> *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270 (September 19, 2008).

<sup>2</sup> *Alliance Pipeline L.P., Letter Order*, Docket No. RP10-563-000 (April 21, 2010).

in the April 26, 2010 Informational Conference,<sup>3</sup> the official title of the NYISO's tariffs, for eTariff purposes, is "NYISO Tariffs." "NYISO Tariffs" will supersede the NYISO's previous, individual tariff names. However, for the benefit of NYISO stakeholders, to whom continuity and familiarity with existing tariff naming conventions and reference identifiers is very important, the NYISO will continue to use the terms "OATT" and "Services Tariff" in its filing transmittal letters to reference the individual Tariffs within the NYISO Tariffs.

In preparation for its baseline filing, the NYISO has taken the opportunity offered by the Commission in Order No. 714 to file section-based tariffs.<sup>4</sup> This effort has allowed the NYISO to renumber its tariff sections to create better continuity and easier reference. Accordingly, NYISO has provided a Table of Contents listing each section title and number designation down to the second level (*i.e.*, 1.1). Following through with the renumbering concept, the NYISO has updated the cross references throughout its Tariffs.

As a consequence of renumbering the NYISO Tariffs, revisions of terms that define numbered sections of the tariff were necessary. These changes include OATT Section 1.16, terms "Part I," "Part II," "Part III," and "Part IV," which were changed to "Part 1," "Part 2," "Part 3," and "Part 4," respectively, to reflect the altered numbering schema of the OATT Body. A new term, "Part 5," was added to reflect the addition of Part 5 to the OATT Body.

To ensure that its baseline electronic tariff record is complete and accurate, the NYISO has included pending compliance filings in its baseline tariff (an option also offered in Order No. 714<sup>5</sup>). Pending compliance deletions are marked with strikethrough and additions are marked with double underline. Endnote compliance filing details, including Order Date, Filing Date, and Proposed Effective Date, are located at the end of each section that includes pending compliance language. The NYISO has included the following Compliance filings in its eTariff baseline document:

Filed March 20, 2008 to comply with order of the Federal Energy Regulatory Commission, Docket No. EL07-39-000, issued March 7, 2008, 122 FERC ¶ 61,211 (2008). Proposed effective date: March 27, 2008.

Filed May 6, 2008 to comply with order of the Federal Energy Regulatory Commission, Docket No. EL07-39-000, issued March 7, 2008, 122 FERC ¶ 61,211 (2008). Proposed effective date: November 1, 2008.

Filed October 30, 2008 to comply with order of the Federal Energy Regulatory Commission, Docket Nos. EL07-39-002, ER08-695-000, and -001, issued September 30, 2008, 124 FERC ¶ 61,301 (2008). Proposed effective date: November 1, 2008.

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<sup>3</sup> FERC Informational Conference Regarding Electronic Tariff Filings, April 26, 2010.

<sup>4</sup> Order No. 714 at P 35.

<sup>5</sup> Order No. 714 at P 101.

Filed December 11, 2009 to comply with order of the Federal Energy Regulatory Commission, Docket Nos. OA08-52-004,-006, issued October 15, 2009, 129 FERC ¶ 61,044 (2009). Proposed effective date: December 14, 2009.

Filed April 13, 2010 to comply with order of the Federal Energy Regulatory Commission, Docket Nos. OA08-52-004 and-006, issued October 15, 2009, 129 FERC ¶ 61,044 (2009). Proposed effective date: April 13, 2010.

### **III. Effective Date**

The NYISO requests an effective date for this baseline electronic tariff of June 30, 2010.

### **IV. Communications**

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

Robert E. Fernandez, General Counsel  
Elaine D. Robinson, Director of Regulatory Affairs  
\*Karen Georgenson Gach, Senior Attorney  
New York Independent System Operator, Inc.  
10 Krey Boulevard  
Rensselaer, NY 12144  
Tel: (518) 356-8875  
Fax: (518) 356-7678  
[rfernandez@nyiso.com](mailto:rfernandez@nyiso.com)  
[erobinson@nyiso.com](mailto:erobinson@nyiso.com)  
[kgach@nyiso.com](mailto:kgach@nyiso.com)

\* Person designated to receive service

### **V. Service**

In addition to electronically serving all parties to the Commission's official service list in this docket, this filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com). The NYISO will email an electronic link to this filing 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 electric utility regulatory agency of New Jersey. The NYISO will also make a paper copy available to any interested party that requests one.<sup>6</sup>

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<sup>6</sup> See 18 C.F.R. § 35.2(e) (2009)

The Honorable Kimberly D. Bose  
June 30, 2010  
Page 4

**VI. Conclusion**

The New York Independent System Operator, Inc. respectfully requests that the Commission accept for filing the baseline electronic tariff attached hereto with an effective date of June 30, 2010.

Respectfully Submitted,

/s/Karen Georgenson Gach

Karen Georgenson Gach

Senior Attorney

New York Independent System Operator, Inc.

**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 Commission Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated at Rensselaer, New York this 30<sup>th</sup> day of June, 2010.

/s/ Joy Zimberlin  
New York Independent System Operator, Inc.  
10 Krey Boulevard  
Rensselaer, NY 12144  
Tel: (518) 356-8540  
Fax: (518) 356-7678  
E-mail: [jzimberlin@nyiso.com](mailto:jzimberlin@nyiso.com)