UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Increased Market and Planning Efficiency
Through Improved Software Docket No. AD10-12-000

COMMENTS OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.

The New York Independent System Operator, Inc. ("NYISO") submits these comments in response to the Commission's July 27, 2010 Notice Establishing Date for Comments in the above-captioned docket.

The NYISO is the independent body responsible for the reliable operation of the New York Transmission System[1] and for system planning. The NYISO participated in the technical conferences convened by the Commission in June of this year. Those conferences presented an excellent mix of academic theory, algorithm development, model efficiency developments, and large user perspectives. The NYISO commends the Commission's efforts to bring these different viewpoints together, as these types of collaborations offer great potential benefits to the industry and ratepayers.

The NYISO believes that the conference discussions underscore the necessity for a pragmatic approach to modeling. The Commission should encourage the industry to focus on development of a common database and database management to assist the modeler in developing databases that can be readily documented and produce repeatable results.

[1] Capitalized terms used in these comments, unless otherwise defined, have the meanings ascribed to them in the NYISO's Open Access Transmission Tariff.

As the Commission is well aware, the power system is becoming more and more complex, and this increasing complexity presents system planners with increasing uncertainties. The development of new control technologies, smart grid implementation, regulatory and policy directives/goals, market rule changes, uncertainty in resources and their locations, trends toward broader regional markets and interregional planning, demands from regulators and market participants for more accuracy, and compliance and auditing requirements all lead to planning becoming more data-intensive and to a heightened need to quickly validate data, view it, and understand it.

In particular, the success of the Department of Energy's initiatives in interconnection-wide planning and the Commission's efforts to promote interregional planning, as proposed in the recent Notice of Proposed Rulemaking in Docket No. RM10-23-000, will depend greatly on the development of credible common databases. Adoption of robust common databases will also support the integration of new technologies and renewable supply sources into the bulk power system. Optimizing application execution time will provide the modeler with the ability to perform more scenario analysis to deal with these evolving and ever increasing uncertainties. Software tools must also provide the user the capability to process and understand voluminous input and output data quickly, in order to provide clear and concise reports to the many stakeholders involved in the planning process.

Multi-disciplinary conferences such as those the Commission sponsored in June are critical to developing practical tools for planners as they undertake more complex tasks. Outside of the technical presentations, these events provide important forums for

discussion and interaction. The NYISO suggests that the Commission set aside more time for such informal interactions at future conferences on this topic.

Respectfully submitted,

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