

March 2, 2011

VIA ELECTRONIC FILING

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

Re: New York Independent System Operator, Inc.'s Comments in Response to
the Federal Energy Regulatory Commission's Notice of Proposed
Rulemaking on the Integration of Variable Energy Resources; Docket
RM10-11-000

Dear Secretary Bose:

The New York Independent System Operator, Inc. ("NYISO") hereby provides its comments on the November 18, 2010 Notice of Proposed Rulemaking regarding Integration of Variable Energy Resources.¹ If there are any questions concerning this filing, please call me at (518) 356-7656.

Respectfully submitted,

/s/David Allen

David Allen

Attorney

New York Independent System Operator, Inc.

dallen@nyiso.com

¹ *Integration of Variable Energy Resources*, Notice of Proposed Rulemaking, Docket No. RM10-11-000, 133 FERC ¶ 61,149. ("NOPR")