

May 9, 2011

**By Electronic Delivery**

Honorable 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. in  
Docket No. ER11-2842-000**

Dear Secretary Bose:

Pursuant to the Federal Energy Regulatory Commission's ("Commission") April 8, 2011 *Order On Tariff Revisions* ("April 8 Order")<sup>1</sup> in this proceeding, the New York Independent System Operator, Inc. ("NYISO") respectfully submits this compliance filing.

**I. Documents Submitted**

1. This filing letter;
2. A clean version of the proposed compliance revisions to the NYISO's Open Access Transmission Tariff ("OATT") ("Attachment I"); and
3. A blacklined version of the proposed revisions to the NYISO's OATT ("Attachment II").

**II. Background**

On February 7, 2011, the NYISO submitted in this proceeding proposed revisions to its Standard Large Facility Interconnection Procedures<sup>2</sup> contained in Attachment X to the NYISO OATT ("Attachment X") and also proposed revisions to the Small Generator Interconnection Procedures contained in Attachment Z to the NYISO OATT ("Attachment Z") ("February 7 Filing"). The Commission accepted the proposed revisions to Attachments X and Z with an effective date of March 1, 2011, subject to a compliance filing, as discussed below.

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<sup>1</sup> *New York Independent System Operator, Inc.*, 135 FERC ¶51,014 (2011).

<sup>2</sup> Capitalized terms not otherwise defined in this letter have the meaning set forth in Attachments S, X and Z of the NYISO's Open Access Transmission Tariff ("OATT").

The modifications accepted in the Commission in its April 8, 2011 Order revise Attachment X to more equitably allocate the study costs from the Class Year Interconnection Facilities Study (“Class Year Study”) among the projects comprising a Class Year group of projects electing to be evaluated for Energy Resource Interconnection Service (“ERIS”).<sup>3</sup> The modifications also revise Attachment Z as to limit the circumstances under which a Small Generating Facility is required to enter a Class Year Study and thereby incur additional Class Year Study costs.

The Commission accepted the proposed modifications and proposed effective date, noting, however, that “NYISO’s intent that they apply to Class Years beginning with Class Year 2011 is only expressly reflected in Tariff language in section 30.13.3.1.” The Commission therefore ordered the NYISO to submit a compliance filing with revised Tariff records for each of the other proposed revisions to reflect that the proposed revisions apply to Class Year 2011 and later.

### **III. Description of the Proposed Revisions**

As the Commission noted in its April 8 Order, the NYISO intends for these proposed tariff revisions to be effective starting with Class Year 2011, but only one of the tariff sections, as revised, states this expressly - Attachment X, Section 30.13.3.1. Pursuant to the Commission’s April 8 Order, the NYISO hereby submits revised tariff language to reflect that the proposed revisions to Attachment Z apply to Class Year 2011 and later.

Specifically, the NYISO proposes to revise Section 32.3.5.3.2 of Attachment Z by adding the following language: “The standard described above in this Section regarding when a Small Generating Facility must enter a Class Year will apply to Small Generating Facilities being considered for entry into Class Year 2011 and beyond.”

Additional modifications included in the NYISO’s February 7 Filing were merely crossreferences to the above-mentioned Sections and, in both Attachment X and Attachment Z, the addition of a definition for the term, “Local System Upgrade Facilities.” The NYISO proposes not to duplicate the Class Year 2011 reference in each of those provisions.

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<sup>3</sup> The NYISO offers two levels of interconnection service under its OATT: Energy Resource Interconnection Service (“ERIS”) and Capacity Resource Interconnection Service (“CRIS”). ERIS is the service provided by NYISO to interconnect the Generating Facility or Merchant Transmission Facility to the New York State Transmission System in accordance with the NYISO Minimum Interconnection Standard, to enable the New York State Transmission System to receive Energy and Ancillary Services from the Generating Facility or Merchant Transmission Facility, pursuant to the terms of the NYISO OATT.

**V. Requested Effective Date**

Pursuant to the Commission's April 8, 2011 Order, the NYISO requests an effective date of March 1, 2011.

**VI. Service**

Copies of this filing are being served on all parties designated on the official service list maintained by the Secretary of the Commission in this proceeding. The NYISO will also send 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 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).

Respectfully submitted,

/s/ Sara B. Keegan

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