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August 15, 2011

**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.*, Docket No. ER11-\_\_\_\_-\_\_\_\_  
Proposed Tariff Clarifications Pertaining to Operations**

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act,<sup>1</sup> the New York Independent System Operator, Inc. (“NYISO”) hereby submits proposed amendments to its Open Access Transmission Tariff (“OATT”) and Market Administration and Control Area Services Tariff (“Services Tariff”) relating to the NYISO’s operational responsibilities.<sup>2</sup> The proposed changes will improve consistency, clarify ambiguities, and remove outdated references without making any substantive changes to current practices.

The modifications proposed here affect sections 5.1 and 5.2 to the Services Tariff and sections 2.12, 2.13, 4.6, and Attachment C to the OATT. The NYISO recently reviewed these sections as part of an ongoing comprehensive review aimed at identifying opportunities to improve and clarify the tariffs. The operations addressed with these changes include Back-Up

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<sup>1</sup> 16 U.S.C. §824d (2000).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning specified in Section 1 of the OATT and Section 2 of the Services Tariff.

Operation, Load Shedding and Curtailment, determination of Total Transfer Capability, and Control Area Services.

These tariff amendments have been approved by the NYISO's Management Committee and the Board of Directors.

**I. Documents Submitted**

1. This filing letter;
2. A clean version of the proposed revisions to the NYISO OATT ("Attachment I");
3. A clean version of the proposed revisions to the NYISO Services Tariff ("Attachment II");
4. A blacklined version of the proposed revisions to the NYISO OATT ("Attachment III"); and
5. A blacklined version of the proposed revisions to the NYISO Services Tariff ("Attachment IV").

**II. Description and Justification of Proposed Tariff Revisions**

**A. Services Tariff Sections 5.1 and 5.2**

The NYISO proposes to reposition language in the first sentence of section 5.1 to clarify that the referenced "Reliability Rules" are promulgated by the New York State Reliability Council.

In section 5.2, the NYISO proposes to replace "effect" with "modify" to accurately reflect that, when necessary, the ISO's authority extends to making actual modifications to External Transactions.

**B. OATT Section 2.12 - Back-Up Operation**

Since the Back-Up Operation procedures contemplated here have already been developed, the NYISO proposes to replace the verb "develop" with "maintain" in the first sentence of subsection 2.12.1. In addition, a reference to the training of Market Participants is proposed for deletion for consistency with current practice. The ISO Back-Up Operation procedures include only the training of ISO Staff and Transmission Owners.

**C. OATT Section 2.13 - Emergency Notification**

In section 2.13, the NYISO proposes more precise language to describe when an emergency notification shall be made. The existing language could be read to require an ongoing report as long as the Emergency State lasts, which is not the intent of this reporting requirement.

#### **D. OATT Section 4.6 - Load Shedding and Curtailment**

Proposed amendments to subsection 4.6.1 clarify that the ISO and the Transmission Owners have a continuing obligation to maintain Load Shedding and Curtailment procedures.

The NYISO proposes to amend the first sentence in subsection 4.6.2 to insert two words inadvertently omitted - the NYISO “will dispatch” generation facilities to resolve reliability issues- and the insertion makes this clear. In addition, the NYISO proposes to delete a sentence to eliminate an inference that the LEER Procedure is the first curtailment procedure to be executed when a Constraint that may impair reliability exists, as this is inconsistent with operations practice under the Tariff and Reliability Rules. Since the LEER Procedure is not a NYISO-developed procedure, a reference to the historical intention behind its development is unnecessary to continue to be included in the NYISO’s OATT.

The NYISO proposes to simplify language in subsection 4.6.7 by replacing “not unduly discriminatory” with “non-discriminatory.”

#### **E. OATT Attachment C Section 9.5 - Total Transfer Capability (“TTC”)**

The NYISO proposes to eliminate the reference to the “MultiRegional Modeling Working Group” in the third paragraph of this section. The databases used in the determination of TTC values include “Eastern Interconnection Reliability Assessment” system representations. “MultiRegional Modeling Working Group” systems representations are no longer used for this purpose.

### **III. Effective Date**

The NYISO requests an effective date of October 14, 2011, which is 60 days from the date of this filing.

### **IV. Stakeholder Approval**

The NYISO’s Management Committee approved the revisions described herein on February 24, 2011 and the NYISO Board of Directors approved them on April 19, 2011.

### **V. Communications and Correspondence**

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

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## **VI. Service**

The NYISO will 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).

## **VII. Conclusion**

Wherefore, for the foregoing reasons, the NYISO respectfully requests that the Commission accept this filing to be effective October 14, 2011.

Respectfully submitted,

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