

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

Integration of Variable Resources

Docket No. RM10-11-000

**REQUEST OF NEW YORK INDEPENDENT SYSTEM OPERATOR, INC. FOR A
10-DAY EXTENSION OF TIME TO FILE COMMENTS IN RESPONSE TO THE
COMMISSION'S NOTICE OF INQUIRY REGARDING INTEGRATION OF
VARIABLE ENERGY RESOURCES**

Pursuant to Rule 2008 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2008 (2007), the New York Independent System Operator, Inc. ("NYISO") respectfully requests a 10-day extension of time -- until April 22, 2010 -- to file comments in response to the Federal Energy Regulatory Commission's (Commission) January 21, 2010 Notice of Inquiry ("NOI") in this proceeding¹. The NYISO is conscious of the fact that the Commission already has granted one extension of time, until April 12, 2010, to make this filing.

The NYISO requires an additional 10 days to prepare its comments regarding integration of variable energy resources ("VERs") due to the complexity and breadth of the issues identified in the Notice of Inquiry. A leader in the integration of VER technologies such as wind generation and energy storage resources, the NYISO has implemented advanced forecasting and dispatch programs and market rules to fully integrate wind resources into its security constrained economic dispatch. The NYISO requires the additional time to provide a fully informed report to the Commission with regard to these operational tools and market design changes that have recently been implemented to integrate wind generation as well as to address appropriate next steps. An extension of time for filing comments will allow the NYISO to gather and summarize

¹ Integration of Variable Energy Resources. Federal Energy Regulatory Commission Notice of Inquiry. Docket No. RM10-11-000. Issued January 21, 2010

its experience from various departments within the organization in order to fully address the questions presented in the NOI. Therefore, the NYISO respectfully requests that the Commission grant the NYISO an extension of 10 days to file its comments in this proceeding.

Respectfully submitted,

/s/ David Allen

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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 Rules of Practice and Procedure, 18 C.F.R.

§ 385.2010.

Dated at Rensselaer, NY this 8th day of April, 2010

By: /s/ Joy A. Zimmerlin
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