

August 1, 2014

By Electronic Delivery

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 and New York Transmission Owners' Compliance Filing; Docket Nos. RM13-2-000, ER14-_____

Dear Ms. Bose:

In compliance with the Federal Energy Regulatory Commission's ("Commission's") Order No. 792,¹ the New York Independent System Operator, Inc. ("NYISO") and the New York Transmission Owners ("NYTOs")² (together, the "Filing Parties") respectfully submit revisions to the Small Generator Interconnection Procedures ("SGIP") and Small Generator Interconnection Agreement ("SGIA") set forth in Attachment Z of the NYISO Open Access Transmission Tariff ("OATT").³ The NYISO and the NYTOs, as the Transmission Providers in New York State,⁴ are collectively filing this compliance filing to fulfill their obligations under

¹ *Small Generator Interconnection Agreements and Procedures*, Order No. 792, 78 Fed. Reg. 73,239 (Dec. 5, 2013), 145 FERC ¶ 61,159 (2013) ("Order No. 792"), *order on clarification*, Order No. 792-A, 146 FERC ¶ 61,214 (2014) ("Order No. 792-A").

² The NYTOs are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Long Island Lighting Company d/b/a LIPA ("LIPA"), New York Power Authority ("NYPA"), New York State Electric & Gas Corp., Niagara Mohawk Power Corp. d/b/a National Grid, Rochester Gas & Electric Corp., and Orange & Rockland Utilities, Inc. The Filing Parties note that LIPA and NYPA, as transmission owners not subject to the Commission's jurisdiction under section 205 of the Federal Power Act, have voluntarily participated in the development of this filing.

³ Capitalized terms that are not otherwise defined in this filing shall have the meaning specified in Attachment Z of the NYISO OATT, and if not defined therein, in Attachment X of the NYISO OATT and Section 1 of the NYISO OATT.

⁴ The term "Transmission Provider" as used in Order No. 792 is defined in the Commission's *pro forma* SGIP as: "The public utility (or its designated agent) that owns, controls, or operates transmission or distribution facilities used for the transmission of electricity in interstate commerce and provides transmission service under the Tariff. The term Transmission Provider should be read to include the Transmission Owner when the Transmission Owner is separate from the Transmission Provider."

Order No. 792 and request that the Commission direct a subsequent compliance filing of the accepted tariff revisions to reflect the ordered effective date, as requested in Section VIII.⁵

The Filing Parties propose revisions to Attachment Z of the NYISO OATT to incorporate the *pro forma* revisions set forth in Order No. 792 with a limited number of variations described below.⁶ The proposed variations conform the *pro forma* revisions to the definitions and terminology of the NYISO OATT previously accepted by the Commission and make certain additional enhancements. The proposed variations are consistent with or superior to the *pro forma* SGIP and SGIA for the reasons discussed in detail in Section IV, *infra*. The Filing Parties respectfully submit that with this compliance filing they fully comply with the requirements set forth in Order No. 792. The NYISO reviewed the proposed revisions with its stakeholders and did not receive any objections.

I. DOCUMENTS SUBMITTED

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

II. COMMUNICATIONS

All communications, pleadings, and orders with respect to this proceeding should be sent to the following individuals:

⁵ Order No. 792 at P 269. Order No. 792 requires that each public utility Transmission Provider submit a compliance filing to demonstrate that it meets the requirements set forth in the order.

⁶ The Filing Parties respectfully request that the Commission waive the compliance requirements set forth in Order No. 792-A to the extent they require the Filing Parties to make two separate filings: (i) to submit the revisions to Attachment Z of the NYISO OATT to adopt the *pro forma* language established in Order No. 792, and (ii) to propose the limited variations described in this compliance filing that are consistent with or superior to the *pro forma* language.

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(2) **Company Representatives Listed on Attachment A at the end of the filing.* ⁹

*Designated to receive service.

⁷ Waiver of the Commission's regulations (18 C.F.R. § 385.203(b)(3)(2014)) is requested to the extent necessary to permit service on counsel for the NYISO in both Virginia and Washington, DC.

⁸ Waiver of the Commission's regulations (18 C.F.R. § 385.203(b)(3)(2014)) is requested to the extent necessary to permit service on counsel for the New York Transmission Owners in both New York and Washington, DC.

⁹ Waiver of the Commission's Regulations (18 C.F.R. § 385.203) is requested to the extent necessary to permit the inclusion on the service list of all of the parties on Attachment A.

III. BACKGROUND

In its Order No. 2006, the Commission established the *pro forma* SGIP and SGIA to set forth the terms and conditions under which public utilities must provide interconnection service to Small Generating Facilities of no more than 20 MW.¹⁰ In compliance with Order No. 2006, the Filing Parties incorporated the SGIP and SGIA in Attachment Z of the NYISO OATT, with certain proposed variations to the *pro forma* requirements - variations accepted by the Commission under the “independent entity” standard.¹¹

Since incorporating the SGIP and SGIA into its OATT, the NYISO has made periodic enhancements to these procedures pursuant to Section 205 of the Federal Power Act¹² and Part 35 of the Commission’s regulations.¹³ In 2011, for example, the NYISO proposed tariff revisions that would add a definition of Local System Upgrade Facilities to its SGIP in order to more equitably allocate study costs and to eliminate the need for certain Small Generating Facilities - those that trigger no System Upgrade Facilities or only Local System Upgrade Facilities - to have to be evaluated as a member of a Class Year Interconnection Facilities Study under the NYISO’s Standard Large Facility Interconnection Procedures (“LFIP”).¹⁴

On November 22, 2013, the Commission issued Order No. 792 to amend the *pro forma* SGIP and SGIA. The Commission identified as the impetus for the order the growth in gridconnected solar photovoltaic generation and small generator interconnection requests driven by state renewable portfolio standards.¹⁵ The Commission found that such growth could cause inefficient interconnection queue backlogs and require some Small Generating Facilities to undergo a more costly study process.¹⁶

¹⁰ *Standardization of Small Generator Interconnection Agreements and Procedures*, Order No. 2006, FERC Stats. & Regs. ¶ 31,180, *order on reh 'g*, Order No. 2006-A, FERC Stats. & Regs. ¶ 31,196 (2005), *order on clarification*, Order No. 2006-B, FERC Stats. & Regs. ¶ 31,221 (2006).

¹¹ *See New York Independent System Operator, Inc. and New York Transmission Owners*, Order on Small Generator Interconnection Compliance Filing, 118 FERC ¶ 61,130 (February 20, 2007) (accepting compliance filing in part and directing certain changes); *New York Independent System Operator, Inc. and New York Transmission Owners*, Order Granting Rehearing in Part and Denying Rehearing in Part and Accepting Compliance Filing, 119 FERC ¶ 61,333 (June 29, 2007) (granting in part and denying in part request for rehearing, clarifying aspects of February 2007 order, and accepting compliance filing in part and directing certain changes); *New York Independent System Operator, Inc. and New York Transmission Owners*, Letter Order, Docket Nos. ER06-311-004 and ER06-311-005 (March 3, 2008).

¹² *See* 16 U.S.C. § 824d (2000).

¹³ 18 C.F.R. § 35 *et seq.* (2009).

¹⁴ *See New York Independent System Operator, Inc.*, 135 FERC ¶ 61,014 (Apr. 8, 2011) (accepting tariff revisions subject to a compliance filing).

¹⁵ Order No. 792 at PP 21-23.

¹⁶ Order No. 792 at P 21.

To address these concerns, the Commission established, through Order No. 792, revisions to the *pro forma* SGIP and SGIA to “reduce the time and cost to process small generator interconnection requests for Interconnection Customers and Transmission Providers, maintain reliability, increase energy supply, and remove barriers to the development of new energy resources.”¹⁷ Specifically, Order No. 792 established a package of reforms to: (i) require the Transmission Provider to provide the Interconnection Customer with a pre-application report; (ii) revise the threshold for certain generators to be evaluated under the Fast Track Process; (iii) revise certain requirements regarding the customer options meeting and supplemental review that follow a generator’s failure of the Fast Track Process screens; (iv) revise the SGIP to specifically permit the Interconnection Customer to provide written comments on the upgrades required for the interconnection in the Facilities Study; (v) explicitly provide for energy storage devices in the SGIP and SGIA; and (vi) make additional clarifications in the SGIP and SGIA.¹⁸ Order No. 792 directed Transmission Providers to submit a compliance filing to revise their SGIP and SGIA as necessary to demonstrate that they satisfy the requirements set forth in the final rule.¹⁹

IV. COMPLIANCE REVISIONS

The Filing Parties propose revisions to Attachment Z of the NYISO OATT to amend the NYISO’s SGIP and SGIA to adopt the *pro forma* revisions set forth in Order No. 792 with a limited number of variations described below. Order No. 792 provides that a Transmission Provider may request variations from the *pro forma* SGIP and SGIA where the revisions are consistent with or superior to the *pro forma* SGIA and SGIP, including in instances in which the Commission has previously accepted variations to the existing SGIP and SGIA.²⁰

As described below, the variations to the *pro forma* SGIP and SGIA proposed by the Filing Parties for Attachment Z of the NYISO OATT are consistent with or superior to the *pro forma* language.

A. Allocation of NYISO and NYTOs Responsibilities as a Transmission Provider

Both the NYISO and the NYTOs have responsibilities in the interconnection process in New York that are assigned to the “Transmission Provider” in the *pro forma* SGIP and SGIA. The Commission has previously accepted in the Order Nos. 2003 and 2006 proceedings the Filing Parties’ proposed revisions to the *pro forma* term “Transmission Provider” that allocate the Transmission Provider’s responsibilities between the NYISO and the NYTOs.²¹

¹⁷ Order No. 792 at P 3.

¹⁸ Order No. 792 at 1.

¹⁹ Order No. 792 at P 269.

²⁰ Order No. 792 at P 269.

²¹ See, e.g., *New York Independent System Operator, Inc. and New York Transmission Owners*, Order Granting Rehearing in Part and Denying Rehearing in Part and Accepting Compliance Filing, 119 FERC ¶ 61,333

Consistent with the existing allocation of the Transmission Provider's responsibilities in the NYISO's SGIP and SGIA, the Filing Parties propose to replace the term "Transmission Provider" as used in the *pro forma* revisions in Order No. 792 with the terms "NYISO," and "Connecting Transmission Owner," or both (e.g., "NYISO, in consultation with the Connecting Transmission Owner") to clarify the respective roles and responsibilities of the NYISO and NYTOs. Specifically, the Filing Parties' proposed revisions make clear that the NYISO is the lead party responsible for administering the process for interconnecting to the New York State Transmission System or Distribution System,²² including taking the lead in the application and study process. In this role, the NYISO directly interfaces with Interconnection Customers and, to the extent it requires information from the NYTOs, consults with the NYTOs. The NYTOs are responsible for providing required information to the NYISO and implementing the interconnection, including procuring equipment and constructing upgrade facilities. The proposed revisions reflect this division of responsibilities under the SGIP and SGIA previously approved by the Commission. They are consistent with or superior to the *pro forma* language as they make clear the respective roles and responsibilities of the NYISO and the NYTOs in the NYISO's SGIP and SGIA.

B. Revisions to the Pre-Application Report Requirements

1. Fee for Pre-Application Report

Order No. 792 established a default fee of \$300 for the Transmission Provider to prepare the pre-application report.²³ However, Order No. 792 also provided that the Transmission Provider could propose an alternative fixed cost-based fee supported by cost justification because it would be unjust and unreasonable for it not to recover its actual preparation costs.²⁴ Accordingly, the Filing Parties propose in Section 32.1.2.2 to establish a fixed \$1000 fee for preparing the pre-application report and to set forth the process by which the NYTOs provide the NYISO with readily available information required for the report and are paid their costs for preparing such information.

The Filing Parties have determined that \$1000 is a more accurate representation of their actual costs in preparing the pre-application report. To make this determination, the Filing Parties identified several Small Generator Facility projects previously included on the NYISO's interconnection queue and performed the work necessary to complete a pre-application report for

(2007) at P 34 (accepting compliance revisions filed by NYISO and NYTOs on March 22, 2007, in the Order No. 2006 proceeding, including the split of responsibilities between the NYISO and NYTO in the SGIP and SGIA.).

²² The term "Distribution System" was added to the NYISO's SGIP pursuant to a Section 205 filing in Docket No. ER13-588-000 and defines the term as: "The Transmission Owner's facilities and equipment used to distribute electricity that are subject to FERC jurisdiction, and are subject to the NYISO's LFIG or SGIP under FERC Order Nos. 2003 and/or 2006. For the purpose of this Agreement, the term Distribution System shall not include LIPA's distribution facilities."

²³ Order No. 792 at P 46.

²⁴ Order No. 792 at P 46.

these projects. The Filing Parties reviewed the time and resources required to complete the sample reports and using their standard rates billed for interconnection study work, determined that \$1000 more accurately represents the actual costs of the work.

Specifically, the Filing Parties selected the following “test” projects for the above-described exercise: (1) a 4.8 MW facility proposing to interconnect to distribution facilities (ultimately determined not to be subject to Commission jurisdiction or the NYISO’s SGIP); (2) a 3.2 MW facility proposing to interconnect at 34.5kV; and (3) a 12.6 MW facility proposing to interconnect at 115kV. For the first two facilities, the respective Connecting Transmission Owners collected responsive information that was readily available to them, spending approximately four (4) to five (5) hours. For the third project, because it proposed to interconnect at a higher voltage level, the NYISO collected responsive information it had readily available, spending approximately four (4) hours to do so. Multiplying the number of hours required for the above projects by the average rates charged by the respective Filing Parties for interconnection study work, the Filing Parties arrived at actual costs ranging from \$660 to \$750. Recognizing that the above projects had already been studied by the Connecting Transmission Owner and/or the NYISO, the Filing Parties determined that additional time would be needed to collect such information for projects not previously evaluated. For such projects, the Filing Parties determined that approximately seven (7) hours would be more likely the amount of time required to pull the same information, with such time estimate equating to a range of \$962.50 to \$1,155 in actual costs (using average study costs at the rates charged by the applicable Connecting Transmission Owners and NYISO in current interconnection studies). Based on this analysis, the Filing Parties determined that a pre-application report fee of \$1000 would be more appropriate and supported by the above-described cost justification.

Based on the estimation that most of the readily available information responsive to the pre-application request form will be available to the respective Connecting Transmission Owners rather than the NYISO, the Filing Parties determined that dividing this proposed \$1000 fee one-third to the NYISO and two-thirds to the appropriate Connecting Transmission Owner is consistent with the respective time and resources the parties will spend in preparing the pre-application reports.

The Filing Parties’ proposed revisions are superior to the *pro forma* language as they ensure that the NYISO and the NYTOs recover their actual costs in preparing the pre-application report.

2. Coordination Required To Process Pre-Application Requests

The NYISO and the NYTOs both possess information necessary for the completion of the pre-application report. While the NYISO will directly interface with the Interconnection Customer seeking a pre-application report, much of the readily available information required to complete the report is in the hands of the NYTOs. For this reason, the Filing Parties propose to establish a process in Section 32.1.2.2 for the NYISO to obtain information from the NYTOs in time to complete the pre-application report within the required 20 business days. Specifically, the NYISO will provide a copy of the pre-application report request form to the appropriate

Connecting Transmission Owner within two business days of receiving the request, and the Connecting Transmission Owner will return the report with the readily available information within fifteen business days of receiving the request form.

The Filing Parties' proposed revisions are superior to the *pro forma* language as they establish explicit time frames for the NYISO and the NYTOs to coordinate the production of the pre-application report in order to provide it to the Interconnection Customer in a timely manner.

3. Revisions to Pre-Application Request Form and Report

The Filing Parties also propose to make the following revisions to certain information in the pre-application report request form and the pre-application report described in Sections 32.1.2.2 and 32.1.2.3 to:

- Request in a new Section 32.1.2.2.9 that the Interconnection Customer indicate whether it intends to use its facility to engage in wholesale sales over the New York State Transmission System or Distribution System. The NYISO, in consultation with the appropriate NYTO, will use this information as described in Section 32.1.2.3 to assist its determination as to whether the proposed project will interconnect to Commission-jurisdictional facilities subject to the SGIP or should be directed to the appropriate state procedures for interconnection.
- Insert the term "county" in the request form as described in Section 32.1.2.2 to assist the NYISO and the appropriate NYTO in identifying the location of the proposed Point of Interconnection.
- Replace the word "line" with "transmission line" in the pre-application report category described in Section 32.1.2.3.5 to clarify that the required data includes "transmission line nominal voltage."
- Insert "station(s)" in Section 32.1.2.3.8 to clarify that the pre-application report will provide peak load and minimum load data for the relevant line sections(s) or the relevant substation, as appropriate.

The proposed revisions are superior to the *pro forma* language for two reasons. First, they enhance the ability of the NYISO and NYTOs to direct the Interconnection Customer to the appropriate interconnection procedures. Further, they provide the Interconnection Customer with more precise information in its pre-application report that will only serve to better inform the Interconnection Customer with regard to the interconnection of its proposed project. For example, by advising an Interconnection Customer that its proposed interconnection is not subject to the SGIP, the Filing Parties may save the Interconnection Customer considerable time that it might otherwise spend completing an Interconnection Request form, only to later find out that it is not subject to the NYISO SGIP.

C. Revisions Regarding Network Resource Interconnection Service

The Filing Parties propose not to adopt the revisions set forth in Order No. 792: (i) clarifying the Order No. 2006 requirement that a Small Generating Facility using Network Resource Interconnection Service interconnect through the LFIP,²⁵ or (ii) the related revisions to insert the definitions of “Network Resource” and “Network Resource Interconnection Service” in the SGIP.

As an initial matter, the NYISO does not provide Network Resource Interconnection Service.²⁶ Rather, as accepted by the Commission, the NYISO’s interconnection process provides for two levels of interconnection service in New York - Energy Resource Interconnection Service²⁷ and Capacity Resource Interconnection Service (“CRIS”).²⁸ Small Generating Facilities that elect CRIS are required to proceed through part of the LFIP - the Class Year Interconnection Facilities Study.²⁹ However, such projects are currently able to take advantage of the SGIP with its lower study cost deposits and other efficiencies (including the more abbreviated SGIA) for the remainder of the interconnection process.³⁰ The Filing Parties respectfully request that this Commission-approved variation from the Order No. 2006 requirement be permitted to remain.

If the NYISO were to require a Small Generating Facility that elects CRIS to proceed through the NYISO’s LFIP in its entirety, such process may unnecessarily increase the time and expense of interconnecting the Small Generating Facility, which appears in direct conflict with the intent of Order No. 792. If the Small Generating Facility were required to go through the entire LFIP and execute a Standard Large Generator Interconnection Agreement, it would

²⁵ Order No. 792 at P232 (noting that “this requirement was included in Order No. 2006 but was not made clear in the *pro forma* SGIP.”), *citing*, Order No. 2006, FERC Stats. & Regs. ¶ 31,180 at P 140.

²⁶ *See, e.g., New York Independent System Operator, Inc., and New York Transmission Owners*, Order Conditionally Accepting Compliance Filing, 126 FERC ¶ 61,046 (January 15, 2009).

²⁷ Energy Resource Interconnection Service (“ERIS”) is basic interconnection service that allows a Developer to interconnect its facility to the New York State Transmission System or Distribution System in accordance with the NYISO Minimum Interconnection Standard to enable the New York State Transmission System or Distribution System to receive electric energy from the facility.

²⁸ CRIS is interconnection service that allows a Developer to interconnect its facility to the New York State Transmission System or Distribution System in accordance with the NYISO Deliverability Interconnection standard, which allows participation in the NYISO’s Installed Capacity market to the extent of the facility’s deliverable capacity. As described in Attachment Z to the NYISO OATT, LIPA maintains a separate interconnection process for generators interconnecting to LIPA’s distribution facilities. Developers electing CRIS under LIPA’s procedures also are qualified to participate in the NYISO’s Installed Capacity market to the extent of the facility’s deliverable capacity.

²⁹ The Small Generating Facility must enter a Class Year to be evaluated for deliverability, and the developer must make payments for any System Deliverability Upgrades required to make the facility deliverable.

³⁰ Small Generating Facilities for which non-Local System Upgrade Facilities are required must also proceed through a Class Year Interconnection Facilities Study. *See* OATT, Attachment Z § 32.3.5.3.2.

potentially be subject to a longer study process, would be responsible for more costly study deposits, could be responsible for greater cost in the Class Year Interconnection Facilities Study than it would in the Interconnection Facilities Study under the SGIP, and would be subject to additional stakeholder review.

For the reasons described above, the existing NYISO procedures are superior to the *pro forma* language that would require the Small Generating Facility to go through the entire LFIP and to incur the additional time and expense of that process.

D. Additional Clarifications and Ministerial Modifications

The Filing Parties propose the following minor clarifications and ministerial modifications to the *pro forma* language established in Order No. 792. The proposed revisions are consistent with or superior to the *pro forma* language as they align this language with the definitions and terminology of the NYISO OATT previously accepted by the Commission, clarify missing or unclear language, and correct a few inconsistencies and grammatical and typographical errors.

| Attachment Z Tariff Section | Reason for Modification |
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| § 32.1.1.7 | Revised existing language to make clarifications required for the relevant sentence to read logically. |
| § 32.1.2.2.4 | Revised to make “type” lowercase, as “Generator Type” is not a defined term in the NYISO OATT. |
| § 32.2.1 | Revised to use “Fast Track Process,” which is a defined term in the NYISO OATT. |
| § 32.2.1 | Revised to make “supplemental review” lowercase as it is not a defined term in the NYISO OATT. |
| §§ 32.2.2.4, 32.2.3, 32.2.3.1, 32.2.4.5.2, 32.2.4.5.3 | Revised to capitalize term “Minor Modification,” which is a defined term in the NYISO OATT. |
| §§ 32.2.3.2 and 32.2.4.5 | Inserted that the NYISO will also provide an executable SGIA to the Connecting Transmission Owner, along with the Interconnection Customer, as the SGIA is a three-party agreement among the NYISO, the Connecting Transmission Owner, and the Interconnection Customer. |
| § 32.2.4.4.1 | Revised to make lowercase “generating facility,” which is not a defined term in Attachment Z of the NYISO OATT. |
| § 32.2.4.4.1.1 | Clarified that the type of generation used by the Small Generating Facility will be taken into account in calculating the load for the application of “this screen,” rather than “screen 32.2.4.4.1.” |
| § 32.2.4.4.3 | Revised to make lowercase “mainline,” which is not a defined term in the NYISO OATT. |

| Attachment Z Tariff Section | Reason for Modification |
|--|--|
| § 32.2.4.4.3.2 | Inserted “is” in this section so that it states: “Whether the load along the line section is uniform or even.” |
| § 32.3.1.1 | Conformed the description of projects participating in the regular Study Process with the changes to the eligibility requirements for the Fast Track Process under Order No. 792 described in Section 32.2. |
| Appendix 1 | Clarified the definition of “Fast Track Process” in the Glossary of Terms in Appendix 1 of the SGIP to include “of the SGIP” after “Section 32.2.1.” |
| Appendix 8 | Replaced the term “Interconnection Facilities Study Report” in Section 9.0 of the Facilities Study Agreement with the term “facilities study report,” which is the term used elsewhere in the SGIP. |
| Global | Made several non-substantive modifications to correct grammatical and typographical errors. For example, added consistent punctuation after the description of each pre-application report category in Section 32.1.2.2. |

VIII. EFFECTIVE DATE

The Filing Parties respectfully request that the tariff revisions filed herewith become effective upon issuance of an Order by the Commission accepting this filing and that until the Commission so acts, the existing Commission-approved NYISO interconnection procedures and *pro forma* Small Generator Interconnection Agreement remain in effect. This requested effective date is consistent with the effective date ultimately granted to the Filing Parties with respect to their Order Nos. 2006, 2006-A and 2006-B compliance filings.³¹ The Filing Parties request that the Commission direct a subsequent compliance filing of the accepted tariff revisions to reflect the ordered effective date as requested above.

IX. SERVICE

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission and the New Jersey Board of Public Utilities. In addition, the complete public version of this filing will be posted on the NYISO’s website at www.nyiso.com.

³¹ See *New York Indep. Sys. Operator, Inc.*, 119 FERC ¶ 61,333, at P 13 (2007) (granting rehearing with respect to the effective dates for the Joint Filing Parties’ Order Nos. 2006, 2006-A and 2006-B compliance filings, and granting the Joint Filing Parties’ request that the tariff sheets filed in the compliance filings become effective upon the date of Commission action.)

X. CONCLUSION

Wherefore, for the foregoing reasons, the New York Independent System Operator, Inc. and New York Transmission Owners respectfully request that the Commission accept this compliance filing.

Respectfully submitted,

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Attachment A

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