

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

New York Independent System  
Operator, Inc.  
Docket No. ER15-2344-000

Issued: September 17, 2015

Hunton & Williams LLP  
951 E. Byrd Street  
Richmond, VA 23219-4074

Attention: Heather S. Glass, Esq.  
Counsel to the New York Independent System Operator, Inc.

Reference: External Transaction Credit Requirements

Dear Ms. Glass:

On July 31, 2015, you submitted, on behalf of the New York Independent System Operator, Inc. (NYISO), revisions to attachment K of NYISO's Market Administration and Control Area Services Tariff.<sup>1</sup> The revisions change the timeframe for requiring credit support for External Transactions to limit the number of days NYISO holds this credit support and to better align the holding period with the NYISO's actual credit exposure. You state that under the proposed tariff revisions NYISO will perform an initial evaluation to calculate the credit requirement for pending Bids for External Transactions three days prior to the Day Ahead Market close for a market day.

Pursuant to the authority delegated to the Director, Division of Electric Power Regulation – East, under 18 C.F.R. § 375.307, your submittal is accepted for filing, effective October 28, 2015, as requested.

The filing was noticed on July 31, 2015, with comments, interventions and protests due on or before August 21, 2015. Pursuant to Rule 214 (18 C.F.R. § 385.214 (2015)), to the extent that any timely filed motions to intervene and any motion to intervene out-of-time were filed before the issuance date of this order, such interventions are granted. Granting late interventions at this stage of the proceeding will not disrupt the

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<sup>1</sup> New York Independent System Operator, Inc., NYISO Tariffs, [NYISO MST, 26.4 MST Att K Operating Requirement and Bidding Requirement, 18.0.0.](#)

proceeding or place additional burdens on existing parties.

This acceptance for filing shall not be construed as constituting approval of the referenced filings or of any rate, charge, classification, or any rule, regulation, or practice affecting such rate or service contained in your filings; nor shall such acceptance be deemed as recognition of any claimed contractual right or obligation associated therewith; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against NYISO.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713.

Sincerely,

Kurt M. Longo, Director  
Division of Electric Power  
Regulation – East