

July 20, 2015

**Submitted Electronically**

Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: New York Independent System Operator, Inc. Compliance Filing;  
Docket No. ER15-550-\_\_\_\_

Dear Ms. Bose:

In accordance with Paragraph 48 and Ordering Paragraph (B) of the Federal Energy Regulatory Commission's ("Commission's") May 19, 2015 *Order on Request for Waivers* ("May Order"),<sup>1</sup> The New York Independent System Operator, Inc. ("NYISO") hereby submits for the Commission's review proposed additions and revisions to Section 2.1.7 of the NYISO's Open Access Transmission Tariff ("OATT") and to Section 5.12 of the NYISO's Market Administration and Control Area Services Tariff ("Services Tariff") to comply with the Commission's September 18, 2014 *Standards for Business Practices and Communication Protocols for Public Utilities* ("Order No. 676-H").<sup>2</sup> The proposed changes revise the Tariffs to reflect incorporation—or waiver as appropriate—of the latest version (Version 003) of the Standards for Business Practices and Communication Protocols for Public Utilities adopted by the Wholesale Electric Quadrant ("WEQ") of the North American Energy Standards Board ("NAESB").

**I. LIST OF DOCUMENTS SUBMITTED**

Along with this filing letter, the NYISO submits the following documents:

1. a blacklined version of the NYISO's proposed revisions to Section 5.12 of its Services Tariff (Attachment I);

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<sup>1</sup> *New York Independent System Operator, Inc.*, 151 FERC ¶ 61,157 (2015).

<sup>2</sup> *Standards for Business Practices and Communications Protocols for Public Utilities*, 148 FERC ¶ 61,205 (Sept. 18, 2014) ("September Order"); Fed. Reg. 14,654 (Mar. 7, 2013), FERC Stats. & Regs. ¶ 31,343 (2013) ("Order No. 676-G").

2. a clean version of the NYISO's proposed revisions to Section 5.12 of its Services Tariff (Attachment II);
3. a blacklined version of the NYISO's proposed revisions to Section 2.17 of its OATT (Attachment III); and
4. a clean version of the NYISO's proposed revisions to Section 2.17 of its OATT (Attachment IV).

## **II. BACKGROUND**

Order No. 676-H requires each RTO/ISO to acknowledge their obligation to comply with Version 003 of the NAESB WEQ standards incorporated by reference by the Commission into its regulations, unless the Commission grants a waiver of such standards. In its May Order, the Commission directed the NYISO to "refile its tariff to list all of the Version 003 NAESB standards," including those standards with which it is obligated to comply, "and in listing each waived standard, cite to the order granting said waiver."<sup>3</sup>

## **III. PROPOSED TARIFF REVISIONS**

As required by Order No. 676-H and the May Order, the NYISO is including Tariff revisions to incorporate by reference the standards adopted by the Commission in this filing. The NYISO seeks to revise Sections 5.1.2 of its Services Tariff and 2.17 of its OATT to include the language specified in Paragraph 89 of Order No. 676-H, as revised in the Errata Notice issued October 3, 2014, and to note the waivers granted pursuant to the May Order and the Notice Granting Extension issued April 15, 2015, granting the NYISO's request for a temporary 24-month extension of WEQ-012 applicable to transactions conducted on NYISO's Market Information System ("MIS").<sup>4</sup>

## **IV. EFFECTIVE DATE**

The NYISO requests that the Commission permit the Tariff revisions proposed to incorporate the NAESB WEQ Version 003 standards to become effective May 15, 2015, the effective date of the standards. The NYISO's proposed effective date is appropriate because it is the date by which the NYISO was required to comply with the standards.<sup>5</sup>

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<sup>3</sup> May Order at P. 48.

<sup>4</sup> The NYISO is submitting these Tariff revisions to both its OATT and to its Services Tariff. Although Order No. 676-H provides that utilities should revise their OATTs to incorporate the NAESB standards, the NYISO's practice has been to incorporate references to the latest standards into both of its Tariffs.

<sup>5</sup> Order 676-H, as modified by *Standards for Business Practices and Communication Protocols for Public Utilities*, Docket No. RM-05-5-024, Notice Granting Limited Time Extension (Jan. 15, 2015).

## **V. SERVICE**

This filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com). In addition, the NYISO will e-mail an electronic link to this filing to the official representative of each party to this proceeding, to each of its customers, to each participant on its stakeholder committees, to the New York State Public Service Commission, and to the New Jersey Board of Public Utilities.

## **VI. CONCLUSION**

Wherefore, for the foregoing reasons, the NYISO respectfully requests that the Commission accept the proposed Tariff revisions included in the Attachments to this filing, without modification, effective May 15, 2015.

Respectfully submitted,

/s/ Christopher R. Sharp

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Inc.

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