

October 20, 2015

By Electronic Delivery

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Docket No. ER15-1061-000, *New York Independent System Operator* –
Notice of Effective Date and Errata Filing**

Dear Secretary Bose:

On February 18, 2015, the NYISO filed proposed tariff revisions related to its Comprehensive Shortage Pricing project.¹ On April 20, 2015, the Federal Energy Regulatory Commission (“Commission”) approved the proposed revisions.² The Commission directed the NYISO to establish an effective date for the tariff revisions “in November 2015, subject to the condition that NYISO provide the Commission with no less than two weeks’ notice of the actual effective date.”³

The NYISO submits this filing to provide notice to the Commission of the expected effective date for the accepted tariff revisions related to the Comprehensive Shortage Pricing project, except for the accepted revisions to Section 2.20 of the Services Tariff and Section 1.20 of the OATT.⁴ It has come to the NYISO’s attention that the previously accepted revisions to the Services Tariff contained certain ministerial errors. The NYISO also submits an errata filing to correct these non-substantive issues.

¹ Docket No. ER15-1061-000, *New York Independent System Operator, Inc.*, Proposed Tariff Revisions to Ancillary Service Demand Curves and the Transmission Shortage Cost (February 18, 2015). Capitalized terms not otherwise defined herein shall have the meaning specified in Section 2 of the NYISO Market Administration and Control Area Services Tariff (“Services Tariff”) and Section 1 of the NYISO Open Access Transmission Tariff (“OATT”).

² *New York Independent System Operator, Inc.*, 151 FERC ¶ 61,057 (2015) (“April 20 Order”).

³ *Id.* at P 20.

⁴ On October 16, 2015, the NYISO filed a request for an extension of the compliance filing deadline as it relates to Section 2.20 of the Services Tariff and Section 1.20 of the OATT due to the delayed implementation of the NYISO’s graduated transmission demand curve. *See* Docket No. ER15-1061-000, *New York Independent System Operator, Inc.*, Motion for Extension of Compliance Filing Deadline, Shortened Response Period and Expedited Action of the New York Independent System Operator, Inc. (October 16, 2015) (“Extension Request”).

I. Documents Submitted

1. This filing letter;
2. A blacklined version of the ministerial corrections to the NYISO's Services Tariff ("Attachment I");
3. A clean version of the accepted revisions to the NYISO's Services Tariff (including incorporation of the ministerial corrections) with an effective date of November 4, 2015, except for the revisions to Section 2.20 of the Services Tariff ("Attachment II"); and
4. A clean version of the accepted revisions to the NYISO's OATT with an effective date of November 4, 2015, except for the revisions to Section 1.20 of the OATT ("Attachment III).

II. Notice of Effective Date

In compliance with Ordering Paragraphs A and B of the April 20 Order, the NYISO hereby provides notice to the Commission that it expects to fully implement the accepted tariff revisions related to the Comprehensive Shortage Pricing project for the November 4, 2015 market day, except for the revisions to Section 2.20 of the Services Tariff and Section 1.20 of the OATT. Attachments II and III provide clean versions of the relevant tariff revisions with an effective date of November 4, 2015.⁵

On October 16, 2015, the NYISO submitted a request for extension in order to delay implementation of the revisions to Section 2.20 of the Services Tariff and Section 1.20 of the OATT.⁶ The requested extension is the result of the delayed implementation of a separate project – the graduated transmission demand curve.⁷ The NYISO has proposed to submit an additional compliance filing at least two weeks prior to the proposed effective date for the revisions to Section 2.20 of the Services Tariff and Section 1.20 of the OATT which will specify the date on which these revisions will take effect.⁸

⁵ Should the NYISO determine that it will be unable to implement the Comprehensive Shortage Pricing project, except for the revisions to Section 2.20 of the Services Tariff and Section 1.20 of the OATT, for the November 4, 2015 market day, it will promptly notify its Market Participants and the Commission.

⁶ See Extension Request.

⁷ *Id.* at 4-6.

⁸ *Id.* at 6.

III. Errata Revisions

In conducting a final review of the tariff revisions prior to implementation, certain non-substantive, ministerial errors in the revisions to the Services Tariff were identified. Ministerial errors were identified with respect to Section 4.4.3.1.2 of the Services Tariff, Section 15.4.6.1 of Rate Schedule 4 of the Services Tariff and Section 15.6.5.1 of Rate Schedule 6 of the Services Tariff, as set forth in Attachment I. The NYISO hereby submits an errata filing to correct these non-substantive issues.⁹

Section 4.4.3.1.2 of the Services Tariff describes the maximum generation pickup mode of the Real-Time Dispatch-Corrective Action Mode (“RTD-CAM”) software. The description of this mode includes an identification of certain locations in which the NYISO may initiate a maximum generation pickup event, including references to the existing reserve regions. The NYISO inadvertently omitted addition of a reference to the new Southeastern New York (“SENY”) reserve region within this section.

Section 15.4.6.1 of Rate Schedule 4 of the Services Tariff describes the calculation of Real-Time Market clearing prices for Operating Reserves. The tariff revisions approved by the April 20 Order add new Shadow Price definitions for SENY Operating Reserves products (*i.e.*, SP7 through SP9). The new Shadow Price definitions for the SENY reserve products inadvertently included a reference to an hourly granularity for pricing rather than the interval level pricing applicable to the Real-Time Market. The errata submission replaces “hour” with “interval” in each of the applicable Shadow Price definitions for the SENY reserve products.

Section 15.6.5.1 of Rate Schedule 6 of the Services Tariff describes the compensation paid to Suppliers of Quick Start Reserves. The Quick Start Reserves providers are located within the SENY reserve region. The equation for calculating the payments owed to Quick Start Reserves providers was inadvertently not updated to reflect the creation of the new SENY reserve region. The errata submission replaces the references to “East” with “SENY” in two components of formula (*i.e.*, P_{10MNSR} and P_{30MR}).

IV. Service

The NYISO will send an electronic link to 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 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.

⁹ The NYISO informed Market Participants of its intent to submit this errata filing and briefly described the nature of the ministerial corrections at an Installed Capacity Working Group meeting held on October 19, 2015.

V. Conclusion

The New York Independent System Operator, Inc. respectfully requests that the Commission accept the ministerial, non-substantive corrections submitted as part of this compliance filing with an effective date of November 4, 2015.

Respectfully submitted,

/s/ Garrett E. Bissell

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