

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

Commission Information Collection
Activities (FERC-921); Comment Request;
Extension

Docket No. IC18-10-000

COMMENTS OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.

In accordance with the Federal Energy Regulatory Commission's ("FERC's" or "Commission's") March 29, 2018 *Comment Request; Extension* ("Request"),¹ the New York Independent System Operator, Inc. ("NYISO") respectfully submits these comments in support of continuing the ongoing delivery of data under FERC-921.

The NYISO has submitted data relating to physical and virtual offers and bids, market awards, resource outputs, marginal cost estimates, shift factors, financial transmission rights, internal bilateral contracts, uplift, and interchange pricing on a continuous basis since 2013 in accordance with FERC Order No. 760.² Along with the Independent System Operators and Regional Transmission Organizations ("ISOs/RTOs") that comprise the ISO/RTO Council ("IRC"),³ the NYISO supported the Commission's 2011 Notice of Proposed Rulemaking.⁴ The IRC's comments supported the

¹ *Commission Information Collection Activities (FERC-921); Comment Request; Extension*, 83 Fed. Reg. 14458 (April 4, 2018) ("Request").

² See Letter Order, *Order No. 760 Compliance Filing - Tariff Amendment*, Docket No. ER12-2481-000 (October 3, 2012). These data elements were identified in FERC Order No. 760 and are the same data elements identified in the Request.

³ The IRC is comprised of the Alberta Electric System Operator ("AESO"); California Independent System Operator ("CAISO"); Electric Reliability Council of Texas ("ERCOT"); the Independent Electricity System Operator of Ontario, Inc. ("IESO"); ISO New England Inc. ("ISO-NE"); Midwest Independent Transmission System Operator, Inc. ("MISO"); New York Independent System Operator, Inc. ("NYISO"); PJM Interconnection, L.L.C. ("PJM"); Southwest Power Pool, Inc. ("SPP"); and New Brunswick System Operator ("NBSO"). The IRC's mission is to work collaboratively to develop effective processes, tools and standard methods for improving the competitive electricity markets across North America. In fulfilling this mission, it is the IRC's goal to provide a perspective that balances reliability standards with market practices so that each complements the other, thereby resulting in efficient, robust markets that provide competitive and reliable service to customers. IRC members conduct their operations in compliance with the NERC Reliability Standards. IRC members operate the bulk power system, administer the organized wholesale electricity markets, and act as the planning authorities within their respective regions. The AESO, IESO, and NBSO are not subject to the Commission's jurisdiction, and did not join the January 25, 2012 comments. Other than with reference to enforcement of reliability standards, ERCOT is not subject to this Commission's jurisdiction and as a result did not join the January 25, 2012 comments.

⁴ See *Comments of the ISO/RTO Council*, Docket No. RM11-17-000 (January 25, 2012).

Commission's intent to receive market data from the ISOs/RTOs through electronic means, on an ongoing basis, to facilitate "the Commission's development and evaluation of its policies and regulations" and to "enhance Commission efforts to detect anticompetitive or manipulative behavior, or ineffective market rules, thereby helping to ensure just and reasonable rates."⁵

The NYISO continues to support the Commission's collection of data to facilitate the Commission's effort "to detect potential anti-competitive or manipulative behavior or ineffective market rules."⁶ The Commission should continue to require the ongoing delivery of data in the same manner that the data is currently delivered, in accordance with FERC Order No. 760 and FERC-921. Extensive collaboration between NYISO Staff and FERC Staff allowed the NYISO to develop, refine and coordinate the process for its ongoing delivery of data to FERC. The NYISO is not aware of any reason to modify the existing process at the risk of having to begin anew. The NYISO recommends that the Commission adopt the three-year extension of the FERC-921 information collection requirement with no changes to the current reporting requirements, as contemplated in the Request.

The NYISO respectfully submits these comments for the Commission's consideration.

Respectfully submitted,

/s/ James H. Sweeney

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June 4, 2018

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⁵ *Id.* at 1.

⁶ *See Request* at 14458.

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 4th day of June, 2018.

/s/ *Mohsana Akter*

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