

December 4, 2018

By Electronic Delivery

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

Re: *New York Independent System Operator, Inc.*, Docket No. ER17-1561-00_
Compliance Filing to Establish an Effective Date for FERC Order No. 831 Tariff
Revisions

Dear Secretary Bose:

In accordance with the requirements of the Federal Energy Regulatory Commission's ("Commission's") November 9, 2017 *Order on Compliance*¹ and February 1, 2018 Letter Order² in this proceeding, the New York Independent System Operator, Inc. ("NYISO") submits this filing to provide notice of an expected effective date of December 18, 2018, for the tariff amendments to comply with Order No. 831.³

The *Order on Compliance* accepted the NYISO's proposal for a flexible effective date of no later than December 31, 2018. The NYISO hereby notifies the Commission and its Market Participants that it intends to implement the offer cap requirements in its software on December 18, 2018. The first Day-Ahead Market day that will incorporate the new offer cap rules will be December 20, 2018.

¹ *New York Indep. Sys. Operator, Inc.*, 161 FERC ¶ 61,151 at PP 1, 12 and Ordering Paragraph (C) ("NYISO is hereby directed to submit a filing with no less than two weeks' notice of the proposed effective date, as discussed in the body of this order.").

² *New York Indep. Sys. Operator, Inc.*, Docket No. ER17-1561-001, Letter Order at p. 2 (February 1, 2018) ("In accordance with the requirements of the November 9, 2017 Order, NYISO will submit a filing providing no less than two weeks' notice of the effective date of the tariff revisions.").

³ *Offer Caps in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order No. 831, 81 Fed. Reg. 87,770 (Dec. 5, 2016), 157 FERC ¶ 61,115 (2016); *Order on Rehearing and Clarification*, Order No. 831-A, 82 Fed. Reg. 53,403 (Nov. 16, 2017), 161 FERC ¶ 61,156 (2017).

I. Documents Submitted

1. This filing letter; and
2. A clean version of the accepted revisions to the Services Tariff (“Attachment I”).

II. Notice of Effective Date

In compliance with the Orders issued in this proceeding, the NYISO hereby provides notice to the Commission that it expects to implement the software on December 18, 2018. The first Day-Ahead Market day that will incorporate the new offer cap rules will be December 20, 2018.

Attachment I provides a clean version of the relevant tariff revisions with an effective date of December 18, 2018.⁴

III. 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.

⁴ Should the NYISO determine that it will be unable to implement the Order No. 745 compliance tariff revisions on December 18, 2018, it will promptly notify its Market Participants and the Commission.

IV. Conclusion

The New York Independent System Operator, Inc. respectfully requests that the Commission accept this compliance filing.

Respectfully submitted,

/s/ Alex M. Schnell

Alex M. Schnell

Assistant General Counsel/

Registered Corporate Counsel

New York Independent System Operator, Inc.

10 Krey Blvd.

Rensselaer, New York 12144

(518) 356-6000

aschnell@nyiso.com

cc: Nicole Buell
Anna Cochrane
James Danly
Jignasa Gadani
Jette Gebhart
Kurt Longo
David Morenoff
Daniel Nowak
Larry Parkinson
Douglas Roe
Kathleen Schnorf
Gary Will