

September 18, 2019

**By Electronic Delivery**

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

**Re: Response to Deficiency Letter in Docket No. ER19-2276-000**

Dear Ms. Bose:

The New York Independent System Operator, Inc. (“NYISO”) submits this response to the Federal Energy Regulatory Commission’s (“Commission”) deficiency letter issued in this proceeding on August 23, 2019 (“Deficiency Letter”). The Deficiency Letter directs the NYISO to respond to six enumerated questions regarding the NYISO’s June 27, 2019 filing in this proceeding (the “June 27 Filing”).<sup>1</sup> Responses to each of the Commission’s questions are provided in Attachment I to this letter.

In addition to the attached responses to the Commission’s questions, the NYISO resubmits certain proposed Tariff revisions (identified as Attachments III and IV in the June 27 Filing). For purposes of this filing, Attachment II contains the redline tariff sections, and Attachment III contains the clean versions. NYISO proposes to change the requested effective date for these tariff revisions from November 1, 2019, to May 1, 2020 for the reasons explained in the NYISO’s September 4, 2019 submittal in this proceeding.<sup>2</sup> The NYISO hereby requests that the remainder of the tariff revisions proposed in its June 27 Filing be permitted to become effective as proposed in that filing. The NYISO further requests that the Commission issue an order accepting all of the tariff revisions proposed in the June 27 Filing within 60 days of the date of this response.

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 State Public Service Commission, and to the

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<sup>1</sup> *New York Indep. Sys. Operator, Inc.*, Proposed Tariff Revisions Regarding Establishment of Participation Model for Aggregations of Resources, Including Distributed Energy Resources, and Proposed Effective Dates, Docket No. ER19-2276 (June 27, 2019) (“June 27 Filing”).

<sup>2</sup> *New York Indep. Sys. Operator, Inc.* September 4, 2019 Filing, Docket No. ER19-2276-000.

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New Jersey Board of Public Utilities. In addition, the complete filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com).

The NYISO respectfully requests that the Commission (i) accept this response to the Deficiency Letter, (ii) accept the NYISO's June 27 Filing, including the proposed tariff revisions, without modification, (iii) permit the proposed tariff revisions to become effective on the dates specified in the June 27 Filing, as amended in this response, and (iv) act on the NYISO's proposed tariff revisions within 60 days.

Respectfully submitted,

/s/ Gregory J. Campbell

Gregory J. Campbell

Attorney

New York Independent System Operator, Inc.

cc: Anna Cochrane  
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