

August 12, 2020

By Electronic Delivery

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

Re: *New York Independent System Operator, Inc.* Docket Nos. ER19-467-000, *et al.*;
Compliance Filing Establishing an Effective Date for the Energy Storage Resource
Participation Model

Dear Secretary Bose:

In accordance with the requirements of the Federal Energy Regulatory Commission's ("Commission's") December 20, 2019 *Order on Compliance Filing*,¹ March 5, 2020 *Notice of Extension of Time*,² and August 3, 2020 *Order on Compliance and Addressing Arguments Raised on Rehearing*,³ the New York Independent System Operator, Inc. ("NYISO") submits this filing to provide notice of an expected effective date of August 26, 2020, for the tariff amendments to implement its Energy Storage Resource ("ESR") participation model in compliance with Order No. 841.⁴ Today the NYISO is submitting notices of an August 26, 2020 effective date in Docket Nos. ER19-467-000, *et al.*, ER20-1696-000, and ER20-2113-000. The tariff amendments proposed and accepted in Docket Nos. ER19-467-000, *et al.*, ER20-1696-000, and ER20-2113-000 comprise the NYISO's ESR participation model, and the NYISO proposes to make the three sets of tariff amendments effective on the same date.

The *Notice of Extension of Time* accepted the NYISO's proposal for a flexible effective date of no later than September 30, 2020 to implement the ESR participation model. The NYISO hereby

¹ *New York Indep. Sys. Operator, Inc.*, 169 FERC ¶ 61,225 (2019).

² *New York Indep. Sys. Operator, Inc.* Notice of Extension of Time, Docket No. ER19-467-000 (March 5, 2020).

³ *New York Indep. Sys. Operator, Inc.*, 172 FERC ¶ 61,119 (Aug. 3, 2020).

⁴ *New York Indep. Sys. Operator, Inc.* December 3, 2019 Compliance Filing and Request for Extension of Time of Effective Date, Docket No. ER19-467-000, amended by *New York Indep. Sys. Operator, Inc.* May 31, 2019 Amendment to Compliance Filing, Docket No. ER19-467-002, and *New York Indep. Sys. Operator, Inc.* February 18, 2020 Compliance Filing, Docket No. ER19-467-004.

notifies the Commission and its Market Participants that it intends to implement the ESR participation model in its software and Tariffs on August 26, 2020.⁵

I. Documents Submitted with this Filing Letter

1. A clean version of the accepted revisions to the Open Access Transmission Tariff (“OATT”) with an effective date of August 26, 2020 (“Attachment I”);
2. A clean version of the accepted revisions to the Market Administration and Control Area Services Tariff (“Services Tariff”) with an effective date of August 26, 2020 (“Attachment II”);
3. A clean version of NYISO Services Tariff Section 2.14 to incorporate the language being made effective in this filing into a version that has been proposed by the NYISO to become effective on September, 29, 2020 (“Attachment III”);⁶ and
4. A clean version of NYISO Services Tariff Section 5.12 to incorporate the language being made effective in this filing into a version that that has been accepted by the Commission to become effective on March 1, 2021 (“Attachment IV”).⁷

II. Notice of Effective Date

In compliance with the *Order on Compliance Filing and Notice of Extension of Time*, the NYISO hereby provides notice that it expects to implement the accepted revisions on August 26, 2020. Making the tariff revisions effective on that date will allow ESRs to submit Real-Time Market Offers for the August 26, 2020 Market Day and Day-Ahead Market Offers for the August 28, 2020 Market Day. The NYISO will promptly notify the Commission and its Market Participants if it determines that it will not be able to implement the tariff amendments on August 26, 2020.

⁵ ESRs may submit offers to sell Energy and Ancillary Services in the Real-Time Market beginning at approximately Hour Beginning 10:00 on Market Day August 26, 2020. ESRs may also begin to submit offers for the Day-Ahead Market on August 26, 2020, of which offers correspond to Day-Ahead Market Day August 28, 2020. ESRs that are Installed Capacity (“ICAP”) Suppliers may offer into the ICAP Auctions in accordance with the schedule identified in the NYISO ICAP Event Calendar available at: http://icap.nyiso.com/ucap/public/evt_calendar_display.do.

⁶ On July 30, 2020, the NYISO submitted tariff revisions to Services Tariff Sec. 2.14 in Docket No. ER20-2555-000. The tariff revisions submitted in that docket did not reflect the tariff amendments accepted in this Docket No. ER19-467-000, *et al.* The tariff revisions included in Attachment III reflect those revisions proposed in Docket Nos. ER19-467-000, *et al.*, and ER20-2555-000. The NYISO has proposed to make those revisions effective on September 29, 2020.

⁷ On January 23, 2020, the Commission accepted tariff revisions to Services Tariff Section 5.12 made in Docket No. ER19-2276-000. The tariff revisions accepted by the Commission in that docket were submitted prior to the Commission’s Orders in Docket Nos. ER19-467-000, *et al.*, and ER20-1696-000, and did not reflect the tariff revisions filed and accepted in Docket Nos. ER19-467-000, *et al.*, and ER20-1696-000. The NYISO submits along with this filing a clean copy of the tariff revisions accepted in Docket No. ER19-2276-000 that include the revisions in Docket Nos. ER19-467-000, *et al.*, and ER20-1696-000. The tariff revisions included in Attachment IV will become effective on March 1, 2021, consistent with the Commission’s January 23, 2020 Order in Docket No. ER19-2276-000.

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.

IV. Conclusion

The New York Independent System Operator, Inc. respectfully requests that the Commission accept this compliance filing and the proposed effective date of August 26, 2020 for the tariff revisions referenced herein.

Respectfully submitted,

/s/ Gregory J. Campbell

Gregory J. Campbell

Attorney

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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 12th day of August 2020.

/s/ Mohsana Akter

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