

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 No. ER20-2113-000; 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") August 6, 2020 *Letter Order* in this docket,¹ the New York Independent System Operator, Inc. ("NYISO") submits this filing to provide notice of an expected effective date of August 26, 2020, for tariff amendments related to its Energy Storage Resource ("ESR") participation model.² 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 *Letter Order* 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 notifies the Commission and its Market Participants that it intends to implement the ESR participation model in its software and Tariffs on August 26, 2020.³

¹ *New York Indep. Sys. Operator, Inc.*, Docket No. ER20-2113-000 (Aug. 6, 2020) (unpublished letter order).

² *New York Indep. Sys. Operator, Inc.* April 30, 2020 Filing, Docket No. ER20-1696-000. The tariff amendments proposed and accepted in this docket complement and/or modify the NYISO's Order No. 841 compliance filings, which comprise the majority of its ESR participation model. *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.

³ 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.

I. Documents Submitted with this Filing Letter

1. 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 I”).

II. Notice of Effective Date

In compliance with the *Letter Order*, 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.

III. Service

The NYISO will send an electronic link for 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

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