

November 23, 2020

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., Compliance Filing; Docket Nos. EL16-92-00_ and ER17-996-00_

Dear Ms. Bose:

In accordance with Ordering Paragraph “(C)” and paragraph 43 of the Commission’s October 7, 2020 Order (“October 7 Order”),¹ the New York Independent System Operator, Inc. (“NYISO”) respectfully submits this compliance filing. The October 7 Order accepted the NYISO’s May 29, 2020 compliance filing² and directed the NYISO to further modify Section 23.4.5.7.5 of the NYISO’s Market Administration and Control Area Services Tariff (“Services Tariff”) to explicitly exclude from the calculation of the Offer Floor for Special Case Resources (“SCR”) “the monthly value of any payments or other benefits the Special Case Resource receives from a retail-level demand response program designed to address distribution-level reliability needs that the Commission has, on a program-specific basis, determined should be excluded.”³ NYISO’s proposed compliance tariff revision adds that language to the Services Tariff.

Specifically, the NYISO is proposing to modify the language in Section 23.4.5.7.5 of the Services Tariff that describes how an Offer Floor for an SCR is calculated to incorporate the compliance language prescribed by the October 7 Order:⁴

The Offer Floor for a Special Case Resource shall be equal to the minimum monthly payment for providing Installed Capacity payable by its Responsible Interface Party, plus the monthly value of any payments or other benefits the Special Case Resource receives from a third party for providing Installed Capacity, or that is received by the Responsible Interface Party for the provision of Installed Capacity by the Special Case Resource, except that it shall exclude the monthly value of any payments or other benefits the Special Case Resource receives from a retail-level demand response program designed to

¹ *New York Independent System Operator, Inc.*, 173 FERC ¶61,022 (2020).

² *New York Independent System Operator, Inc.*, Docket No. ER17-996-003 (filed May 29, 2020) (“May 2020 Compliance Filing”).

³ Capitalized terms not otherwise defined herein shall have the meaning specified in the Services Tariff.

⁴ See October 7 Order at P 43.

address distribution-level reliability needs that the Commission has, on a program-specific basis, determined should be excluded.

The NYISO has posted the two distribution load relief programs (“DLRPs”) that the Commission found are to be excluded from the Offer Floor calculations on its website.⁵ The NYISO will update its website if and when the Commission issues a finding that any other program(s) should be excluded from the Offer Floor calculation. With the addition of the compliance language, the Services Tariff will make it clear that the NYISO will include all other payments received by Responsible Interface Parties and SCRs in the Offer Floor calculation of a new SCR going forward. As directed by the October 7 Order, the compliance tariff revision became effective as of October 7, 2020.⁶ The NYISO already followed the Commission’s directive in its evaluations of new SCR resources that enrolled to participate in the Installed Capacity market beginning November 2020.

Communications regarding this proceeding should be sent to:

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***Designated to receive service.**

The NYISO submits the following documents with this transmittal letter:

1. A blacklined version of the NYISO Services Tariff compliance revisions proposed in this filing (“Attachment I”); and
2. A clean version of the NYISO Services Tariff compliance revisions proposed in this filing (“Attachment II”).

⁵ These programs include DLRP administered by Consolidated Edison Company of New York, Inc. and Orange and Rockland Utilities, Inc., only. See: <https://www.nyiso.com/documents/20142/11354522/SCR-Offer-Floor-Programs.pdf>.

⁶ See October 7 Order at P 43 (stating that this “revision will be effective as of the date of this order.”).

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.

In conclusion, the NYISO respectfully asks that the Commission accept the tariff revisions with this compliance filing, effective October 7, 2020, without any conditions and without instituting any further proceedings.

Respectfully Submitted,

/s/ David Allen

David Allen
Senior Attorney
New York Independent System Operator, Inc.

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