

March 5, 2021

Submitted Electronically

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

Re: *New York Independent System Operator, Inc.’s Proposed Tariff Amendments to the Coordination Agreement Between ISO New England Inc. and the New York Independent System Operator*; Docket No. ER21-____-000.

Dear Ms. Bose:

The New York Independent System Operator, Inc. (“NYISO”) submits this filing pursuant to Section 205 of the Federal Power Act (“FPA”)¹ to propose amendments to the Coordination Agreement between ISO New England, Inc. (“ISO-NE”) and NYISO (“Coordination Agreement”), which is Section 37 of the NYISO’s Open Access Transmission Tariff (“OATT”). The NYISO and ISO-NE worked together to develop the revisions proposed herein and gained approval of the revisions from their respective stakeholders. ISO-NE will separately file the revised Coordination Agreement that resides in its tariffs with the Federal Energy Regulatory Commission (“Commission”). The NYISO and ISO-NE are collectively referred to herein as the “ISOs.”

The ISOs propose revisions to Schedule A of the Coordination Agreement (“Schedule A”), which describes the Interconnections between New England and New York.² The proposed revisions continue to identify the three ISO-NE/NYISO Interconnections;³ however, the detailed descriptions of each Interconnection will be removed from Schedule A and the ISOs will, instead, be obligated to jointly develop and maintain an “ISO-NE / NYISO List of Interconnection Facilities.” The ISOs will be required to post the ISO-NE / NYISO List of Interconnection Facilities on each of their respective public websites. The posted information will include descriptions of the Interties and metering points. The proposed website posting will be comparable to the interconnection facilities list that is currently included in Schedule A of the Coordination Agreement. The approached proposed herein will allow the ISOs to maintain more

¹ 16 U.S.C. §824d.

² Capitalized terms not otherwise defined herein shall have the meaning specified in the OATT or Coordination Agreement.

³ The three ISO-NE/NYISO Interconnections are: (1) the “NY/NE Northern AC Interconnection,” (2) the Northport-Norwalk Harbor Cable (“NNC Interconnection”), and (3) the Cross Sound Cable (“CSC Interconnection”).

accurate and up-to-date facility lists while reducing the need to submit largely ministerial tariff updates for Commission review under Section 205 of the FPA.

The NYISO's Management Committee unanimously approved the proposed revisions on November 18, 2020.

I. List of Documents Submitted

The NYISO submits the following documents with this filing letter:

1. A clean version of the proposed revisions to the NYISO's OATT ("Attachment I"); and
2. A blacklined version of the proposed revisions to the NYISO's OATT ("Attachment II").

II. Correspondence

All communications and correspondence concerning this filing should be directed to:

Robert E. Fernandez, Executive Vice President & General Counsel
Karen G. Gach, Deputy General Counsel
Raymond Stalter, Director, Regulatory Affairs
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III. Background

Schedule A of the Coordination Agreement, NYISO OATT Section 37, identifies the New England – New York Interconnections and specifies the associated Interties and metering points that comprise each Interconnection. The List of Interconnections names the specific Transmission lines, or Interties, that comprise each of the three main Interconnections. The List of Interties then includes further details such as transmission substation names and locations. The substation names and locations change from time to time, as equipment is added to or removed from the transmission system at the border between NYISO and ISO-NE.

NYISO and ISO-NE identified a necessary revision to Schedule A after a new transmission substation was constructed on one of the Interties between New York and Connecticut. Revising Schedule A, including the replacement of a substation name, requires

both ISOs to work with their respective stakeholders and to file each and every change with the Commission pursuant to Section 205 of the Federal Power Act. In this case, a new substation was built on the 398 Intertie that connects New York and Connecticut. This line formerly connected the Pleasant Valley transmission substation in New York to the Long Mountain transmission substation in Connecticut. However, the new Cricket Valley transmission substation is now located between the existing Pleasant Valley transmission substation and the border between New York and Connecticut, so the ISOs need to update Schedule A to include the new facility.

Making FPA 205 filings in both New York and New England to identify a new substation on an existing transmission line requires a significant amount of coordination. During their efforts to revise Schedule A, the ISOs determined that removing the list of Interties and associated transmission equipment from their respective tariffs presents a valuable opportunity for the ISOs to both (a) maintain more accurate and up-to-date facility lists (the Cricket Valley substation first entered service in May 2019), and (b) reduce the need to submit largely ministerial tariff updates (in this case, to reflect the addition of a new substation on an existing transmission line) for Commission review under Section 205 of the FPA.

IV. Description of Proposed Revisions to the OATT

The ISOs propose to revise Schedule A of the Coordination Agreement such that Schedule A continues to specify the three main ISO-NE/NYISO Interconnections. The Intertie and associated transmission equipment details will be removed from the Tariffs and posted on the ISOs' respective websites. The revised Schedule A will continue to specify the three ISO-NE / NYISO Interconnections; (1) the "NY/NE Northern AC Interconnection," (2) the Northport-Norwalk Harbor Cable ("NNC Interconnection"), and (3) the Cross Sound Cable ("CSC Interconnection") as it does today, and will include instructions to check the ISOs' respective websites for further details about the specific Interties and metering points. The proposed revisions remove the list of Interties and associated transmission equipment from Schedule A.

The ISOs also propose revisions to Schedule A of the Coordination Agreement that will obligate the NYISO and ISO-NE to jointly develop and maintain an ISO-NE / NYISO List of Interconnection Facilities. The new, jointly-developed list of Interconnection Facilities will include descriptions of the associated Interties and metering points. The proposed revisions to Schedule A further obligate the ISOs to post the most current mutually agreed upon facilities list on each of their respective public websites.

The new ISO-NE / NYISO List of Interconnection Facilities website posting will be comparable to the list that the ISOs propose to remove from Schedule A to the Coordination Agreement. The ISOs' postings will include the appropriate update to reference the new Cricket Valley substation. Moving the list of Interties and metering points from the tariffs to a pair of website postings will allow the ISOs to make minor changes to the list of Interties more quickly, so that the lists can be kept more accurate and up-to-date without requiring FERC filings by both

ISOs and Commission action to incorporate minor changes. The ISOs will notify their respective stakeholders when the website posting is updated.⁴

V. Effective Date

The NYISO respectfully requests a May 5, 2021 effective date for the tariff revisions proposed in this filing (*i.e.*, the day following the end of the statutory 60-day notice period).

VI. Stakeholder Approval

The Management Committee unanimously approved the revisions to the OATT on November 18, 2020. The NYISO Board of Directors approved the proposed tariff revisions on January 12, 2021.

VII. Service

The NYISO will send an electronic link to this filing to the official representative of each of its customers, each participant on its stakeholder committees, the New York State Public Service Commission, and the New Jersey Board of Public Utilities. The NYISO will also post the complete filing on its website at www.nyiso.com.

VIII. Conclusion

The NYISO respectfully requests that the Commission accept the tariff revisions proposed in this filing without modification, with an effective date of May 5, 2021.

Respectfully submitted,

/s/ James H. Sweeney

James H. Sweeney, Senior Attorney
New York Independent System Operator, Inc.

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| cc: | Matthew Christiansen | David Morenoff |
| | Jignasa Gadani | Larry Parkinson |
| | Jette Gebhart | Douglas Roe |
| | Leanne Khammal | Frank Swigonski |
| | Kurt Longo | Eric Vandenberg |
| | John C. Miller | Gary Will |

⁴ NYISO Stakeholders will also learn about the transmission equipment modifications that will be reflected in updates to the 'ISO-NE / NYISO List of Interconnection Facilities' website posting through other committee, working group, and/or advisory subcommittee meetings. The NYISO Operating Committee, and its working groups and subcommittees routinely discuss modifications to the New York State Power System.