

November 30, 2021

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.*; Notice of Effective Date /  
Amendment Setting Proposed Effective Date, Docket No. ER22-418-  
00\_**

Dear Secretary Bose:

On January 29, 2021, the New York Independent System Operator, Inc. (“NYISO”) filed proposed revisions to its Market Administration and Control Area Services Tariff (“Services Tariff”) and Open Access Transmission Tariff (“OATT”) to implement Co-located Storage Resources (“CSR”) in its Energy, Ancillary Services and Installed Capacity Markets (“January CSR Filing”).<sup>1</sup> On March 30, 2021, the Federal Energy Regulatory Commission (“Commission”) issued an Order accepting the NYISO’s proposed CSR Tariff revisions (“CSR Order”).<sup>2</sup> On November 17, 2021, the NYISO submitted its *Proposed Enhancements to Tariff Revisions to Implement Co-located Storage Resources and Request for Waiver of 60-Day Prior Notice Period* in Docket No. ER22-418-000 (“November CSR Filing”).<sup>3</sup> The NYISO submits this filing to set a proposed effective date for the Tariff revisions that the NYISO submitted in its November CSR Filing.

The November CSR filing proposes a limited and discrete set of changes to the CSR rules that the Commission accepted in its CSR Order. The changes are necessary to address issues that the NYISO identified while testing the software improvements it made to its Day-Ahead Security Constrained Unit Commitment (“SCUC”) and to its Real-Time Commitment (“RTC”) and Real-Time Dispatch (“RTD”) programs. The November CSR Filing demonstrates that there is good cause for the Commission to waive the 60-day prior notice requirement and to permit the Tariff revisions proposed in Docket No. ER22-418 to become effective on the same flexible effective date as the Tariff revisions that the NYISO developed to implement CSR in its Energy, Ancillary Services and Capacity Markets.

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<sup>1</sup> *New York Independent System Operator, Inc., Proposed Tariff Revisions to Implement Co-located Storage Resources*, Docket No. ER21-1001-000 (January 29, 2021) (“January CSR Filing”).

<sup>2</sup> *New York Independent System Operator, Inc., Order Accepting Proposed Tariff Revisions to Implement Participation Model for Co-located Storage Resources*, 174 FERC ¶ 61,242 (2021) (“CSR Order”).

<sup>3</sup> *New York Independent System Operator, Inc., Proposed Enhancements to Tariff Revisions to Implement Co-located Storage Resources and Request for Waiver of 60-Day Prior Notice Period*, Docket No. ER22-418-000 (November 17, 2021) (“November CSR Filing”).

The NYISO submitted a filing earlier today in Docket No. ER21-1001-00\_ proposing to make the Tariff revisions that the NYISO developed to implement CSR in its Energy, Ancillary Services and Capacity Markets effective on December 15, 2021. Consistent with its request for permission to make the CSR Tariff revisions it proposed in Docket No. ER22-418 effective on the same day as the CSR Tariff revisions that the Commission permitted to become effective on a flexible effective date in its CSR Order, the NYISO submits this amendment to its November CSR Filing to provide notice of the expected effective date for the not-yet effective Services Tariff and OATT revisions that the NYISO proposed in Docket No. ER22-418-000.

## **I. Documents Submitted**

The NYISO respectfully submits the following with this filing letter:

1. A clean version of the revisions to the Services Tariff that were proposed with a flexible effective date in the November CSR Filing, with an effective date of December 15, 2021 (Attachment I);
2. A redlined version of the revisions to the Services Tariff that were proposed with a flexible effective date in the November CSR Filing, with an effective date of December 15, 2021 (Attachment II);
3. A clean version of the revisions to the OATT that were proposed with a flexible effective date in the November CSR Filing, with an effective date of December 15, 2021 (Attachment III); and
4. A redlined version of the revisions to the OATT that were proposed with a flexible effective date in the November CSR Filing, with an effective date of December 15, 2021 (Attachment IV).

## **II. Notice of Effective Date**

The NYISO hereby provides notice to the Commission that it expects to implement the revisions to the Services Tariff and OATT that were proposed with a flexible effective date in its November CSR Filing on December 15, 2021, unless it is instructed to do otherwise by the Commission.<sup>4</sup> The revisions will be implemented on December 15, 2021 in the Real-Time Market upon activation of the software enhancements supporting such revisions. For the Day-Ahead Market, the Services Tariff revisions will be incorporated into the execution of the Day-Ahead Market occurring on December 16, 2021 for the December 17, 2021 Day-Ahead market day.

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<sup>4</sup> Should the NYISO determine that it will be unable to implement these Tariff revisions on December 15, 2021, it will promptly notify its Market Participants and the Commission.

### **III. Service**

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, to the New York State Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, a complete copy of this filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com), and the NYISO will send an electronic link to this filing to the official representative of each of its customers and to each participant on its stakeholder committees.

### **IV. Conclusion**

The NYISO respectfully requests that the Commission accept this filing and permit the proposed Tariff revisions to become effective on December 15, 2021 for the reasons explained in the NYISO's November CSR Filing.

Respectfully submitted,

/s/ Alex M. Schnell

Alex M. Schnell

Assistant General Counsel/

Registered Corporate Counsel

New York Independent System Operator, Inc.

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