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FILE NO: 55430.000072

July 30, 2010

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

**Re: *New York Independent System Operator, Inc.*, Errata to July 26, 2010 Filing in  
Docket No. ER10-1977-000**

Dear Ms. Bose:

On July 26, 2010, the New York Independent System Operator, Inc. (“NYISO”) submitted proposed revisions to its Market Administration and Control Area Services Tariff (“Services Tariff”) and its Open Access Transmission Tariff (“OATT”) to revise rules related to Real-Time Energy offers. Specifically, the July 26, 2010 filing proposed tariff changes to allow Generators to increase their real-time offers for Day-Ahead Market committed incremental Energy. It has since come to the NYISO’s attention that several inadvertent errors were made in the proposed tariff sheets and the NYISO is submitting this filing to correct those errors. The changes proposed herein do not alter the substance of the NYISO’s filing, but will correct errors, eliminate ambiguities and ensure that the submitted tariff language accurately reflects the NYISO’s proposal. Therefore, the NYISO submits that this errata should be accepted by the Commission.

## **I. Communications and Correspondence**

All communications and correspondence in this proceeding should be directed to:

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## II. Documents Submitted

1. This filing letter;
2. Clean Services Tariff Sheets reflecting the proposed changes; and
3. Redline Services Tariff Sheets reflecting the proposed changes.

## III. Proposed Modifications

### A. Clarifying Changes

Section 15.4.1.3 of the Services Tariff provides requirements for payment of Operating Reserves to Suppliers of Operating Reserves located within the NYCA and subject to the NYISO's Operational Control. Section 15.4.1.3 addresses a Generator's ability to increase Incremental Energy Bids that have been scheduled in the Day-Ahead Market. The July 26, 2010 filing should have proposed a modification to this section to allow entities to increase their real-time bids, so long as they are not otherwise prohibited from doing so by other tariff provisions. While the NYISO submitted conforming revisions to Section 4.4.2.2.1 of the Services Tariff, due to an administrative oversight it did not submit the necessary revisions to Section 15.4.1.3. The NYISO proposes to modify section 15.4.1.3, as follows:

Generators or Demand Side Resources that are selected to provide Operating Reserve in the Day-Ahead Market or any supplemental commitment may ~~not~~ increase their Incremental Energy Bids or Demand Reduction Bids for portions of their Resources that have been Scheduled through those processes; provided however, that they are not otherwise prohibited from doing so pursuant to other provisions of the ISO's Tariffs. They may not, however, or reduce their Day-Ahead Market or supplemental commitments in real-time except to the extent that they are directed to do so by the ISO.

The July 26, 2010 filing also omitted changes to two inputs to the formula for determining Real-Time BPCG for Generators in RTD intervals other than supplemental event intervals. Section 18.4.2 of the Services Tariff should have been modified to reflect that such inputs may include costs authorized for recovery under Section 4.1.8 of the Services Tariff. The NYISO, therefore, proposes the following modifications:

$MGC_{gi}^{RT}$  = Minimum Generation Bid by Generator g, or when applicable the mitigated Minimum Generation Bid for Generator g, in the Real-Time

Market for the hour that includes RTD interval i, expressed in terms of \$/MWh, which Bid or mitigated Bid may include costs pursuant to Section 4.1.8

$SUC_{gj}^{RT}$  = Start-Up Bid by Generator g, or when applicable the mitigated Start-Up Bid for Generator g, for hour j into RTD expressed in terms of \$/start, which Bid or mitigated Bid may include costs pursuant to Section 4.1.8

## **B. Corrections to Typographical Errors**

Additionally, the NYISO proposes to correct the following typographical errors:

- In the first paragraph of section 4.4.2.2.1 of the Services Tariff, replace the word “or” with “and”;
- In section 23.4.3.2 of Attachment H of the Services Tariff, correct the spelling of the word “made”;
- In section 23.4.3.3.4 of Attachment H of the Services Tariff, correct the spelling of the words “Market” and “pursuant”;
- In section 23.4.7.1 of Attachment H of the Services Tariff, replace the word “of” with “for”;
- In Section 18.1(iii) of Attachment C of the Services Tariff, insert a space between the words “a” and “real-time”; and
- In Section 18.1(viii) of Attachment C of the Services Tariff, replace the word “Care” with “Case”.

## **IV. Effective Date**

The NYISO respectfully requests that the Commission accept these modifications with a September 30, 2010 effective date, the same effective date requested for the modifications proposed in the July 26, 2010 filing.

## **V. Service**

The NYISO will send an electronic link to this filing 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 electric utility regulatory agency of New Jersey. In addition, the complete filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com). This is in accordance with 18 C.F.R. § 35.2(e).

## **VI. Conclusion**

The NYISO respectfully requests that the Commission accept this errata for the reasons specified herein.

Respectfully submitted,

/s/Vanessa A. Colón

Vanessa A. Colón

Counsel to

the New York Independent System Operator, Inc.