

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

New York Independent System Operator, Inc.                    )                    Docket No. ER09-1142-000

**MOTION FOR EXTENSION OF TIME**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure,<sup>1</sup> the New York Independent System Operator, Inc. ("NYISO") respectfully submits this motion for an extension of time to submit the portion of its compliance filing addressing the demand response resource issues raised in the November 20, 2009 order in the above captioned proceeding ("November 2009 Order").<sup>2</sup> Specifically, the NYISO requests an additional week from February 18, 2010 (*i.e.*, until February 25, 2010) to address the Commission's directives that the NYISO provide: (1) additional information demonstrating the reasonableness of its rules requiring demand response resources to use the same telemetry and communications equipment as generators; and (2) a plan of action for permitting demand response resource participation in its real-time energy market. The NYISO is not requesting an extension for the other issues on which the Commission directed the NYISO to submit a compliance filing by February 18, 2010. The NYISO will submit a compliance filing on those other issues, as directed, on February 18, 2010.

Granting a one week extension on the demand response resource issues will ensure that the NYISO is able to provide its stakeholders with a final review of the NYISO's proposals before they are filed with the Commission.

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<sup>1</sup> 18 C.F.R. §§ 385.212 and 385.2008 (2009).

<sup>2</sup> *New York Independent System Operator, Inc.*, 129 FERC ¶ 61,164 (2009) ("November 2009 Order").

## **I. Background**

The November 2009 Order addressed the NYISO's Order No. 719 compliance filing which included proposed revisions to the NYISO OATT and Services Tariff to implement Order No. 719's market monitoring and bid disclosure requirements. The NYISO's compliance filing also explained that the NYISO's tariffs already complied with Order No. 719's directives regarding: (i) demand response and market pricing during periods of operating reserve shortage; (ii) responsiveness to customers and other stakeholders; and (iii) facilitating long-term power contracts.

The November 2009 Order accepted the NYISO's proposed tariff revisions, subject to a further compliance filing. With respect to demand response resource issues, the Commission largely accepted the NYISO's proposals but directed it to: (1) show that the application of the same telemetry and communications requirements to demand response resources that apply to generators is reasonable; and (2) submit a plan of action for allowing technically capable demand response resources to provide energy imbalance service in the real-time energy market.

## **II. Motion for Extension of Time**

The NYISO respectfully requests an extension of time, from February 18, 2010 until February 25, 2010, to submit its compliance filing in response to the demand response resource issues identified in the November 2009 Order. The NYISO has been discussing the applicable demand response issues with its stakeholders, and is nearly finished with its compliance filing. However, the NYISO would like to provide its stakeholders with final opportunity to review, understand and informally discuss the NYISO's proposals before they are submitted to the Commission. A Price Responsive Load Working Group meeting is scheduled for February 23, 2010, during which the NYISO will provide its stakeholders with this opportunity. Allowing this

final opportunity for stakeholder review will result in a filing that most effectively addresses the demand response resource directives in the November 2009 Order.

Accordingly, the NYISO submits good cause exists for the Commission to grant the NYISO an additional week (*i.e.*, until February 25, 2010) to file its compliance filing and respectfully requests that the Commission grant the extension.

#### **IV. Conclusion**

For the reasons set forth herein, the New York Independent System Operator, Inc. respectfully requests that the Commission grant a one week extension, from February 18, 2010 until February 25, 2010, to submit the compliance filing as described herein.

Respectfully submitted,

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Ted J. Murphy  
Counsel for  
New York Independent System Operator, Inc.

February 17, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 17<sup>th</sup> day of February, 2010

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/s/

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