

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

New York Independent System Operator, Inc.)	Docket Nos. ER08-1281-005
)	ER08-1281-006
)	ER08-1281-

MOTION FOR EXTENSION OF TIME

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure,¹ the New York Independent System Operator, Inc. (“NYISO”) respectfully submits this *Motion for Extension of Time* to comply with the portion of the Commission’s December 30, 2010 Order (“December 2010 Order”) directing the NYISO to produce copies of all the studies it has done regarding loop flow issues and various possible solutions to such issues.² The NYISO requests a 28-day extension from January 31, 2011 to February 28, 2011 for the reasons specified below.

I. BACKGROUND

In a July 15, 2010 Commission Order³ (“July 2010 Order”), the NYISO was directed to provide “all studies preformed by or for the NYISO” which show various impacts caused by the operation of the Michigan-Ontario PARs.⁴ In response to the July 2010 Order the NYISO filed a response on August 16, 2010 and an updated supplemental response on October 14, 2010. The December 2010 Order found that the NYISO failed to identify and produce all the loop flow-related studies it was directed to produce in the July 2010 Order, but did not specifically identify studies that the NYISO failed to provide. The NYISO believes it provided all presentations and analyses that were responsive

¹ 18 C.F.R. §§ 385.212 and 385.2008 (2009).

² *New York Independent System Operator, Inc.*, 133 FERC ¶ 61,276 at P 25, n 20 and Ordering Paragraph (B) (2010) (“December 2010 Order”).

³ *New York Independent System Operator, Inc.*, 132 FERC61,031 (2010) (“July 2010 Order”). This

⁴ *Id.* at Appendix A, Question 12.

to the Commission's July 2010 Order in its August and October responses, but now seeks to respond to the Commission's December 2010 Order compliance instructions. The NYISO, working in conjunction with its Market Monitoring Unit Potomac Economics, has identified additional information it will further provide in order to be responsive, but requires additional time to produce this information at a more granular level than it presently exists.

II. MOTION FOR EXTENSION OF TIME

The NYISO submits that a 28-day extension will provide it with the time needed to respond with additional granularity to the compliance obligations in the December 2010 Order. After extensive internal discussion, the NYISO has decided to interpret the Commission's instruction in a broad manner. Accordingly, the NYISO intends to produce additional information supporting and explaining the analysis performed by Potomac Economics and the methods Potomac Economics used to produce the final "Analysis of the Broader Regional Markets Initiatives" presentation that was reviewed with interested stakeholders and Commission Staff in attendance at a Broader Regional Markets technical conference that was held in Philadelphia, Pennsylvania on September 27, 2010, and submitted to the Commission in a supplemental data response on October 14, 2010. Potomac Economics further intends to assemble and provide related data for review by the Commission and interested parties.

In addition to the data being provided by Potomac Economics, the NYISO will provide additional details regarding the studies it included in its August 16, 2010 response and the studies described in its July 21, 2008 Exigent Circumstances Filing.⁵

The effort to provide additional granularity will require the NYISO and Potomac Economics to create new documents in order to respond to the Commission's request. For this reason, the NYISO's request for additional time is appropriate.

⁵ The NYISO will also provide the final version of the Potomac Economics study from that filing. The Potomac Economics study is publicly available.

III. COMMUNICATIONS

Correspondence and communications with respect to this filing should be sent to:

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IV. CONCLUSION

For the reasons set forth above, the NYISO submits that good cause exists to grant an extension of time, until February 28, 2011, to make its compliance filing regarding the additional studies requested by the Commission.

Respectfully Submitted,

/s/ Kristin A. Bluvas

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January 27, 2011

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 in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 27th day of January, 2011.

/s/ Joy A. Zimmerlin

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