NEW YORK INDEPENDENT SYSTEM OPERATOR
10 Krey Boulevard ♦ Rensselaer, NY 12144

March 3, 2011

By Electronic Delivery

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

Re: New York Independent System Operator, Inc.'s Informational Filing Regarding the Simultaneous Import Limitation Study, Docket No. AD10-2.

Dear Secretary Bose:

In accordance with Commission Order 697[1] and Commission staff direction, the New York Independent System Operator, Inc. ("NYISO") respectfully submits, for informational purposes, the attached presentation titled "2009 Simultaneous Import Limit Determination NYISO." The data in this presentation was compiled by the NYISO in order to assist the New York Transmission Owners in fulfilling their obligations associated with Commission Order No. 697. This presentation details the NYISO seasonal Simultaneous Import Limits for 2009, along with the methodology used in developing these limit levels. A draft of this presentation was provided to the New York Transmission Owners to support their filing obligations, and was also reviewed with FERC staff prior to this filing.

The New York Independent System Operator respectfully requests that the Commission accept this informational report. If you have any questions please do not hesitate to contact the undersigned.

Respectfully Submitted,

/s/ Kristin A. Bluvas
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[1] *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity And Ancillary Services By Public Utilities*, Final Rule, Order No. 697, 119 FERC ¶ 61,295 (June 21, 2007).

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 3rd day of March, 2011.

/s/ Joy Zimberlin

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2009
Simultaneous Import Limit Determination
NYISO

Operations Engineering

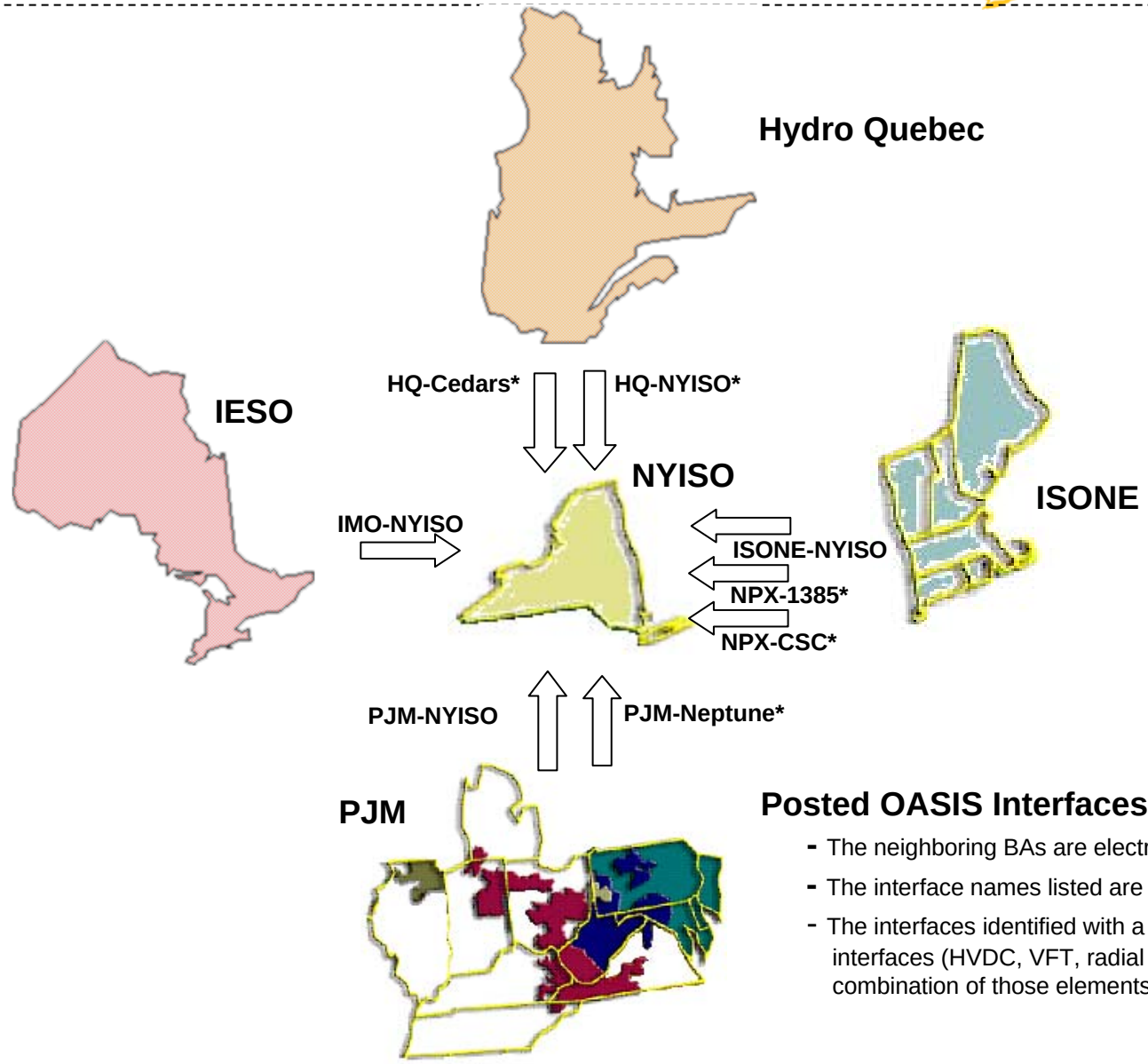
March 3, 2011

Required

- Four seasonal historic total NYISO Simultaneous Import Limit (SIL) values for the period winter 2008/09 through fall 2009.

- Allocation of the total historical SIL values to specific limits with neighboring Balancing Authorities (PJM, ISONE, IESO, and HQ).

- Adjustments for firm transmission commitments held by affiliated companies that represent transfer capability not available to unaffiliated companies.



Posted OASIS Interfaces

- The neighboring BAs are electrically non-contiguous
- The interface names listed are the OASIS identifiers
- The interfaces identified with a "*" are controlled interfaces (HVDC, VFT, radial generation or a combination of those elements)

2009 NYISO Simultaneous Import limits

Table 1		
2009 Season	NYISO Simultaneous Import Limits	NYISO System Peak Loads
Winter	7749 MW	24674 MW
Spring	7710 MW	23528 MW
Summer	7816 MW	30844 MW
Fall	7716 MW	23562 MW

The simultaneous import TTC values provided are consistent with the TTCs employed in operating the transmission system and posting availability on OASIS during the seasonal peak loads periods of 2009.

Approach (1 OF 2)

- **In accordance with FERC Order 697:**
  - NYISO accounts for simultaneity in determining the SIL.
  - The TTC values employed are those used in operating the transmission system and posting availability on OASIS.
  - The TTC values were studied in a manner which includes the TTC/ATC methodologies identified in the NYISO OATT.
  - The TTC values employed represent more than interface constraints at the balancing authority area border and reflect all transmission limitations within the study area and limitations within first-tier areas.

Approach (2 OF 2)

No Physical Transaction Scheduling in NYISO:

- The NYISO OATT does not permit firm transmission commitment reservations of tie capability [for companies affiliated with transmission owners in NY].
  - *All NYISO transmission scheduling is achieved via financial evaluation of transaction bids placed by MPs in the DAM and HAM markets.*
  - *Long-term financial scheduling is not available; [all scheduling is conducted in the DAM and HAM evaluations].*
- Thus, no TTC adjustments for applicable firm transmission commitments held by affiliated companies, representing transfer capability not available to first-tier supply, are required.

Required Evidence w/r/t TTCs

- The TTC values employed:
- Account for simultaneity through the application of significant (400-500 MW) TRMs applied to first-tier areas where transfers to NYISO would result in loop flow through other first-tier entities.
- Account for all external transmission limitations existing in first-tier areas as demonstrated by historical record of adjustments to TTC values day-ahead and hour-ahead based on operating restrictions within first-tier areas.
- Account for all transmission reliability margins as defined in the NYISO OATT.
- Are used in operating the transmission system and posting availability on OASIS.

Data Sources

- NYISO website posting of TTC and ATC
  - *http://mis.nyiso.com/public/P-8list.htm*
- NYISO website posting of TRM and CBM
  - *http://www.nyiso.com/public/webdocs/market_data/power_grid_info/margin_with_external_trm.pdf*
- NYISO website posting of load
  - *http://mis.nyiso.com/public/P-58Clist.htm*

Winter Peak Load						
12/22/08 17:00	Load 24,674 MW					
Interface Name	**TTC**	**TRM****	**CBM**	**Adjusted TTC**	**ATC**	**Scheduled**
HQ-CEDARS	199	0	0	199	199	0
HQ-NYISO	1200*	0	0	1200*	1146*	54
IMO-NYISO	2050	400	0	1650	1218	432
ISONE-NYISO	1250	50	0	1200	1200	0
NPX-1385	0	0	0	0	0	0
NPX-CSC	340	0	0	340	10	330
PJM-NEPTUNE	660	0	0	660	0	660
PJM-NYISO	3000	500	0	2500	1294	1206
	8699	950	0	7749	5067	2682

*The HQ-NYISO interface is restricted to 1200 MW sinking into NY. The posted value of 1500 MW accounts for the potential to wheel 300MW from Hydro Quebec thru New York. For SIL determination purposes these TTCs and ATCs have been adjusted to reflect only transfer capability into NYISO.

**Controllable ties have a TRM of zero since they can be continuously and precisely controlled.

Spring Peak Load						
3/2/09 18:00	Load 23,528 MW					
Interface Name	**TTC**	**TRM****	**CBM**	**Adjusted TTC**	**ATC**	**Scheduled**
HQ-CEDARS	60	0	0	60	60	0
HQ-NYISO	1200*	0	0	1200*	516*	684
IMO-NYISO	2050	400	0	1650	1363	287
ISONE-NYISO	1250	50	0	1200	3	1197
NPX-1385	100	0	0	100	23	77
NPX-CSC	340	0	0	340	10	330
PJM-NEPTUNE	660	0	0	660	0	660
PJM-NYISO	3000	500	0	2500	2500	0
	8660	950	0	7710	4475	3235

*The HQ-NYISO interface is restricted to 1200 MW sinking into NY. The posted value of 1500 MW accounts for the potential to wheel 300MW from Hydro Quebec thru New York. For SIL determination purposes these TTCs and ATCs have been adjusted to reflect only transfer capability into NYISO.

**Controllable ties have a TRM of zero since they can be continuously and precisely controlled.

Summer Peak Load						
8/17/09 15:00	Load 30,844 MW					
Interface Name	**TTC**	**TRM****	**CBM**	**Adjusted TTC**	**ATC**	**Scheduled**
HQ-CEDARS	166	0	0	166	1	165
HQ-NYISO	1200*	0	0	1200*	10*	1190
IMO-NYISO	2050	400	0	1650	1650	0
ISONE-NYISO	1250	50	0	1200	820	380
NPX-1385	100	0	0	100	0	100
NPX-CSC	340	0	0	340	10	330
PJM-NEPTUNE	660	0	0	660	0	660
PJM-NYISO	3000	500	0	2500	1645	855
	8766	950	0	7816	4136	3680

*The HQ-NYISO interface is restricted to 1200 MW sinking into NY. The posted value of 1500 MW accounts for the potential to wheel 300MW from Hydro Quebec thru New York. For SIL determination purposes these TTCs and ATCs have been adjusted to reflect only transfer capability into NYISO.

**Controllable ties have a TRM of zero since they can be continuously and precisely controlled.

Fall Peak Load						
9/24/09 13:00	Load 23,563 MW					
Interface Name	**TTC**	**TRM****	**CBM**	**Adjusted TTC**	**ATC**	**Scheduled**
HQ-CEDARS	166	0	0	166	1	165
HQ-NYISO	1200*	0	0	1200*	16*	1184
IMO-NYISO	2050	400	0	1650	759	891
ISONE-NYISO	1250	50	0	1200	1200	0
NPX-1385	0	0	0	0	0	0
NPX-CSC	340	0	0	340	10	330
PJM-NEPTUNE	660	0	0	660	0	660
PJM-NYISO	3000	500	0	2500	1555	945
	8666	950	0	7716	3541	4175

*The HQ-NYISO interface is restricted to 1200 MW sinking into NY. The posted value of 1500 MW accounts for the potential to wheel 300MW from Hydro Quebec thru New York. For SIL determination purposes these TTCs and ATCs have been adjusted to reflect only transfer capability into NYISO.

**Controllable ties have a TRM of zero since they can be continuously and precisely controlled.

- **2.2.1 Initial Allocation of Available Transfer Capability:**
  - *Firm Transmission Service under this Tariff is obtained when the Transmission Customer agrees to pay the Congestion associated with its service.*

NYISO Tariffs – OATT Attachment C 9.1 Overview

- The ISO shall calculate and post ATC values for its Internal and External Interfaces and for Scheduled Lines.
- The ISO's Interfaces represent a defined set of transmission facilities that separate Locational Based Marginal Pricing (LBMP) Load Zones within the New York Control Area and that separate the New York Control Area from adjacent Control Areas.
- External Interfaces may be represented by one or more Proxy Generator Buses for scheduling and dispatching purposes. Each Proxy Generator Bus may be associated with distinct, posted ATC values.
- Scheduled Lines represent a transmission facility or set of transmission facilities that provide a separate scheduling path interconnecting the ISO to an adjacent Control Area. Each Scheduled Line is associated with a distinct Proxy Generator bus for which the ISO separately posts ATC.

Approach

- **Commission Determination** – Order No. 697 at P 364
- Southern's suggestion that the Commission allow the use of simultaneous TTC values is consistent with the SIL study provided that these TTCs are the values that are used in operating the transmission system and posting availability on OASIS. The simultaneous TTCs[1] must represent more than interface constraints at the balancing authority area border and must reflect all transmission limitations within the study area and limitations within first-tier areas. The source (first-tier remote resources) can only deliver power to load in the seller's balancing authority area if adequate transmission is available out of its first-tier area, adequate transmission is available at the seller's balancing authority area interface, and transmission is internally available. Thus, the TTC must be appropriately adjusted for all applicable (as discussed below) firm transmission commitments held by affiliated companies that represent transfer capability not available to first-tier supply. Sellers submitting simultaneous TTC values must provide evidence that these values account for simultaneity, account for all internal transmission limitations, account for all external transmission limitations existing in first-tier areas, account for all transmission reliability margins, and are used in operating the transmission system and posting availability on OASIS.

Sub-Markets

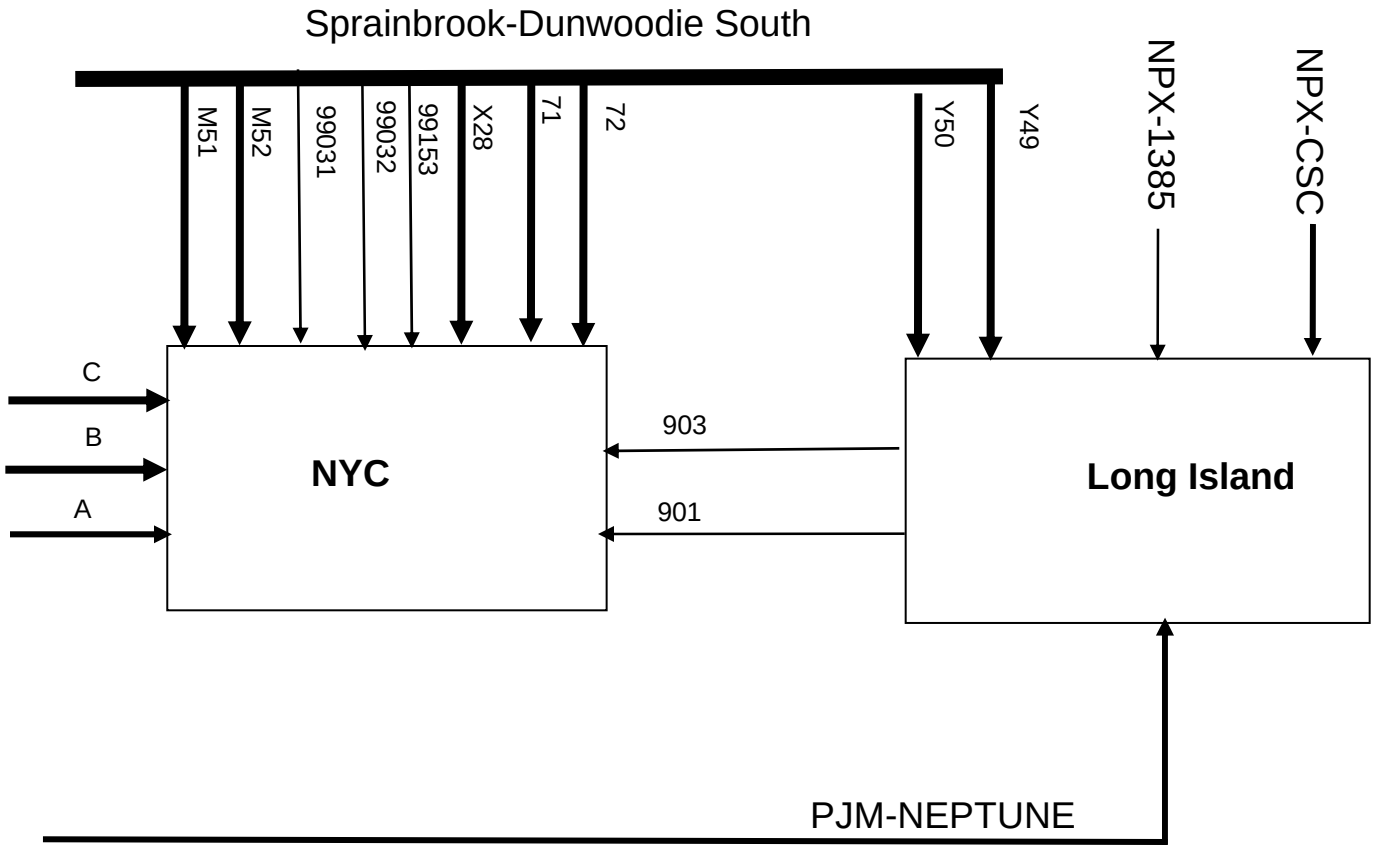
- The NYISO tariffs address sub-markets (NYC and Long Island) only as they pertain to capacity markets.

- The NYISO energy markets do not address sub-markets and TTCs and ATCs are neither calculated, monitored, nor posted for capacity market defined areas NYC and Long Island.

Equivalent SIL for Sub- Markets

- An approximation of the transfer capability into the capacity sub-markets of Con Ed and Long Island can be calculated by summing the capability of the controlled ties into those area and pro-rating the Sprain Brook-Dunwoodie South TTC between the areas.
- The net scheduled interchange into the Con Ed and Long Island resulting from the statewide security constrained commitment and dispatch is calculated and can be regarded as the equivalent scheduled transfer into the areas.
- The difference between the approximated transfer capability into the capacity sub-markets and the net scheduled interchange within those areas can be regarded as an adjusted ATC.

Sub- Market Interconnections



Winter Peak Load – Long Island			
12/22/08 17:00	Load 3450 MW		
Interface Name	**Adjusted TTC**	**Adjusted ATC**	**Scheduled**
NPX-1385	0		
NPX-CSC	340		
PJM-NEPTUNE	660		
Spr-Dunw S (LIPA)	850		
Con Ed-Lipa	-280		
	1570	101	1469

Spring Peak Load – Long Island			
3/2/09 18:00	Load 3286 MW		
Interface Name	**Adjusted TTC**	**Adjusted ATC**	**Scheduled**
NPX-1385	100		
NPX-CSC	340		
PJM-NEPTUNE	660		
Spr-Dunw S (LIPA)	850		
Con Ed-LIPA	-280		
	1670	143	1527

Summer Peak Load – Long Island			
8/17/09 15:00	Load 4047 MW		
Interface Name	**Adjusted TTC**	**Adjusted ATC**	**Scheduled**
NPX-1385	100		
NPX-CSC	340		
PJM-NEPTUNE	660		
Spr-Dunw S (LIPA)	850		
Con Ed-LIPA	-280		
	1670	3	1667

Fall Peak Load – Long Island			
9/24/09 13:00	Load 3043 MW		
Interface Name	**Adjusted TTC**	**Adjusted ATC**	**Scheduled**
NPX-1385	100		
NPX-CSC	340		
PJM-NEPTUNE	660		
Spr-Dunw S (LIPA)	850		
Con Ed-Lipa	-280		
	1670	-96	1766

Winter Peak Load – NYC			
12/22/08 17:00	Load 7731 MW		
Interface Name	**Adjusted TTC**	**Adjusted ATC**	**Scheduled**
A-B-C	1000		
Spr-Dunw S (NYC)	3750		
Con Ed-LIPA	280		
	5030	304	4726

Spring Peak Load – NYC			
3/2/09 18:00	Load 7300 MW		
Interface Name	**Adjusted TTC**	**Adjusted ATC**	**Scheduled**
A-B-C	1000		
Spr-Dunw S (NYC)	3500		
Con Ed-LIPA	280		
	4780	1074	3706

Summer Peak Load – NYC			
8/17/09 15:00	Load 9150 MW		
Interface Name	**Adjusted TTC**	**Adjusted ATC**	**Scheduled**
A-B-C	1000		
Spr-Dunw S (NYC)	3500		
Con Ed-LIPA	280		
	4780	176	4604

Fall Peak Load – NYC			
9/24/09 13:00	Load 7130 MW		
Interface Name	**Adjusted TTC**	**Adjusted ATC**	**Scheduled**
A-B-C	1000		
Spr-Dunw S (NYC)	3500		
Con Ed-LIPA	280		
	4780	463	4317