

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

**New York Independent System
Operator, Inc.**

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Docket No. ER08-1281-007

**MOTION FOR EXTENSION OF TIME TO COMPLY
OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

Pursuant to Rules 212 and 2008(a) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§ 385.212, 385.2008 (2010), the New York Independent System Operator, Inc. (“NYISO”) respectfully submits this *Motion for Extension of Time to Comply* (“Motion”). This Motion requests that, pending Commission action on the NYISO’s January 31, 2011 *Request for Rehearing* (“Rehearing Request”) in the above-captioned Docket, the Commission grant the NYISO an extension of time to comply with Paragraphs 31 and 32 of the Commission’s December 30, 2010 *Order on Rehearing and Compliance*, 133 FERC ¶ 61,276 (“Order”).

Consistent with the “good cause” standard specified in Rule 2008 of the Commission’s Rules of Practice and Procedure, the NYISO requests an extension of time to comply with Paragraph 31 of the Order until January 15, 2012, and an extension of time to comply with Paragraph 32 of the Order until December 31, 2012.

I. Motion for Extension of Time to Comply

On January 31, 2001 the NYISO timely submitted its Rehearing Request in the above-captioned Docket. The Rehearing Request explained that it would not be possible for the NYISO to complete implementation of the Broader Regional Markets Market-to-Market Coordination (“Market-to-Market”) solution with PJM Interconnection, LLC (“PJM”) by the end of the second quarter of 2011. Instead, the NYISO proposed an accelerated schedule for implementing Market-to-Market that PJM supports.¹

The Rehearing Request explained that, while it *might* be possible for the NYISO to complete Interface Pricing by the end of the second quarter of 2011, the NYISO would have to de-prioritize other high value projects, including Enhanced Interregional Transaction Coordination (which was conditionally accepted for filing by the Commission on March 14, 2011 in Docket No. ER11-2547²), in order to concentrate its resources on implementing Interface Pricing Revisions. The Rehearing Request further explained that engaging in an all-out attempt to implement Interface Pricing Revisions by the end of the second quarter of 2011 would significantly disrupt the NYISO’s 2011 Project Plan, which the NYISO uses to efficiently schedule the use of critical path resources that are necessary to complete all projects that will ultimately impact the operation of the New York markets. PJM has also indicated that it supports the NYISO’s proposed schedule for implementing Interface Pricing.³

Consistent with the Commission’s Order, the NYISO has set aside its efforts to develop the Buy-Through of Congestion Broader Regional Market solution to Lake Erie

¹ See PJM’s *Motion for Leave to Answer and Answer*, submitted in Docket No. ER08-1281-007 on February 11, 2011, at 2.

² *New York Independent System Operator, Inc.*, 134 FERC ¶ 61,186.

³ See PJM’s *Motion for Leave to Answer and Answer* at 3.

loop flow until Market-to-Market and Interface Pricing Revisions are in place.

Consistent with the Order, the NYISO is working diligently and in good faith to expeditiously implement both Market-to-Market with PJM and Interface Pricing Revisions. In its Rehearing Request the NYISO explained to the Commission why its good-faith efforts to implement these two measures will not permit it to meet the second quarter of 2011 deadline specified in the Order.

On March 2, 2011 the Commission issued an *Order Granting Rehearing for Further Reconsideration* in the above-captioned Docket. The NYISO recognizes that it is appropriate for the Commission to take the time it requires to reach an informed decision with regard to the NYISO's Rehearing Request.

Pending and subject to Commission action on the NYISO's Rehearing Request the NYISO respectfully requests that the Commission determine that the NYISO's request satisfies the "good cause" standard specified in Rule 2008, and grant the NYISO (1) an extension of time to comply with Paragraph 31 of the Order (the paragraph that addresses Interface Pricing Revisions) until January 15, 2012, and (2) an extension of time to comply with Paragraph 32 of the Order (the paragraph that address Market-to-Market) until December 31, 2012.

Alternatively, the NYISO requests that the Commission rule on the NYISO's Rehearing Request, which would effectively render this Motion moot.

II. Conclusion

For the reasons set forth above, and in the NYISO's Rehearing Request, the NYISO respectfully requests that the Commission grant the NYISO its requested extensions of time to comply with Paragraphs 31 and 32 of the Order for good cause shown. Alternatively, the NYISO requests that the Commission render this Motion moot by ruling on the NYISO's pending Rehearing Request.

Respectfully submitted,

/s/ Alex M. Schnell

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March 18, 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 (2010).

Dated at Rensselaer, New York this 18th day of March, 2011.

By: /s/ Alex M. Schnell
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