

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

**Demand Response Compensation in)
Organized Wholesale Energy Markets)**

Docket No. RM10-17-000

**MOTION OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR REQUESTING
EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the “Commission”), 18 C.F.R. § 385.212 (2011), the New York Independent System Operator, Inc. (“NYISO”) hereby moves for an extension of time to submit its compliance filing in accordance with the order issued in this proceeding on March 15, 2011 (“Order No. 745” or “the Order”).¹ In addition, the NYISO respectfully requests that the Commission shorten the period for the filing of answers to this motion and require the submission of any answers on or before July 21, 2011, in order to facilitate a prompt ruling by the Commission that will guide the NYISO’s implementation of the Order.

I. BACKGROUND

In Order No. 745, the Commission directed the NYISO to submit a compliance filing reflecting the tariff changes necessary to implement the approach to demand response compensation set out in the Order on or before July 22, 2011. The Commission required the NYISO to address a number of issues including, among other things, the application of a net benefits test, an explanation of any revised measurement and verification requirements, and cost allocation for demand response resources.

¹ See *Demand Response Compensation in Organized Wholesale Energy Markets*, Order No. 745, 76 Fed. Reg. 16,658 (Mar. 15, 2011), FERC Stats. & Regs. ¶ 31,322 at P 6 (2011), *reh’g pending*.

Since the issuance of the Order, the NYISO staff has been working on, and testing, various approaches to the net benefits test as well as reviewing the existing measurement and verification protocols and the cost allocation method in light of the Order's requirements. The NYISO presented progress reports on the development of the compliance filing to its Market Participants on May 9 and June 30, 2011. Due to the complexity of the issues, the NYISO was not able to present the details of its proposal for the net benefits calculation until July 18, 2011, when the NYISO hosted an in-depth discussion with stakeholders. There were several comments and questions raised by stakeholders during this discussion that NYISO staff has committed to consider and evaluate in completing its compliance filing. The NYISO believes that its ultimate proposal will benefit from stakeholders' views and comments and believes that the additional time requested in this motion will increase stakeholder support for the compliance filing.

II. MOTION FOR EXTENSION OF TIME

The NYISO requests that the Commission extend the July 22, 2011 compliance filing deadline in this proceeding by four weeks, to August 19, 2011. The NYISO will use the additional time until August 19th to conduct analysis related to the issues raised by stakeholders at July 18th Market Issues Working Group meeting, respond to any additional stakeholder concerns, and make any modifications to its approach that it believes are justified. The NYISO also plans to distribute its proposed tariff language and supporting documentation to stakeholders and request additional comments during this extended period. Depending on the comments received on the proposed compliance filing, the NYISO may also conduct an additional stakeholder meeting in this time.

The extension of the deadline sought here would allow stakeholders more time to consider the details of the net benefits methodology that the NYISO plans to propose in its

compliance filing, and would provide the NYISO with sufficient time to consider and respond to their views and comments. The NYISO expects the extension will result in a compliance filing that is more likely to receive broad stakeholder support.

III. CONCLUSION

For the foregoing reasons, the NYISO requests that the Commission extend the compliance filing deadline in this proceeding to August 19, 2011.

Respectfully submitted,

/s/Elizabeth A. Grisaru

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Date: July 19, 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 19th day of July, 2011

/s/ Joy Zimmerlin

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