

November 15, 2022

**By Electronic Delivery**

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

Re: *New York Independent System Operator, Inc.*, Filing to Supplement the Record; Docket No. ER21-2460-000, *et al.*

Dear Secretary Bose:

On November 14, 2022, the New York Independent System Operator, Inc. (“NYISO”) submitted to the Federal Energy Regulatory Commission a Motion to extend the effective date of its Order No. 2222 compliance tariff revisions.<sup>1</sup>

Consistent with that filing, the NYISO hereby supplements the record with the signed and notarized Affidavit of Michael A. DeSocio.<sup>2</sup>

**I. Service**

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, a complete copy of this filing will be posted on the NYISO’s website at [www.nyiso.com](http://www.nyiso.com), and the NYISO will send an electronic link to this filing to the official representative of each of its customers and to each participant on its stakeholder committees.

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<sup>1</sup> New York Indep. Sys. Operator, Inc., Motion to Extend Effective Date of Compliance Tariff Revisions, Docket No. ER21-2460-000, *et al.* (Nov. 14, 2022).

<sup>2</sup> *Id.* at n. 27.

## **II. Conclusion**

The NYISO respectfully requests that the Commission accept this filing to supplement its November 14, 2022 filing in the above captioned proceeding.

Respectfully submitted,

/s/ Gregory J. Campbell

Gregory J. Campbell

*Counsel for the*

*New York Independent System Operator, Inc.*

cc: Janel Burdick  
Matthew Christiansen  
Robert Fares  
Jignasa Gadani  
Jette Gebhart  
Leanne Khammal  
Jaime Knepper  
Kurt Longo  
David Morenoff  
Douglas Roe  
Eric Vandenberg  
Gary Will  
Adria Woods

## Attachment A

Affidavit of Michael A. DeSocio



4. The purpose of this Affidavit is to confirm, to the extent necessary, the facts set forth in the NYISO's November 14, 2022 Motion of New York Independent System Operator, Inc. to Extend Effective Date of Compliance Tariff Revisions ("NYISO Motion").
5. In my capacity as Senior Manager of Market Design and later Director of Market Design, I oversaw the NYISO's development of its Distributed Energy Resource ("DER") rules that were filed on June 27, 2019 and accepted by the Commission on January 23, 2020 in Docket No. ER19-2276-000, *et al. New York Indep. Sys. Operator, Inc.*, Order Accepting Tariff Revisions and Directing Compliance Filing and Informational Report, 170 FERC ¶ 61,0333 (2020). I also oversaw the NYISO's development of its Order No. 2222<sup>1</sup> compliance filing that was submitted on July 19, 2021.
6. Members of my staff who focus on developing participation models for new resource integration and I worked with the NYISO's Operations and Product and Project Management Departments, and an external software vendor, to determine how the NYISO could achieve compliance with Order No. 2222's requirements. As part of that effort, the NYISO identified computational and software modifications that were necessary to permit Distributed Energy Resource and Aggregation participation in the NYISO-administered Energy, Ancillary Services and Installed Capacity markets.<sup>2</sup>
7. I participated in developing the NYISO's answer to protests that was submitted in Docket No. ER21-2460-000 on September 14, 2021. I participated in developing the NYISO's response to the Commission's deficiency letter that was submitted in Docket Nos. ER21-

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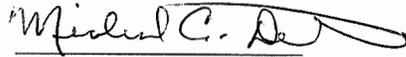
<sup>1</sup> *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order No. 2222, 172 FERC 61,247 (Sep. 17, 2020), 85 Fed. Reg. 70,143 (Nov. 4, 2020) ("Order No. 2222"); Order No. 2222-A, 174 FERC ¶ 61,197 (Mar. 18, 2021); Order No. 2222-B, 175 FERC ¶ 61,227 (Jun. 17, 2021).

<sup>2</sup> Capitalized terms that are not defined in this Affidavit have the meaning ascribed to them in the NYISO's Market Administration and Control Area Services Tariff.

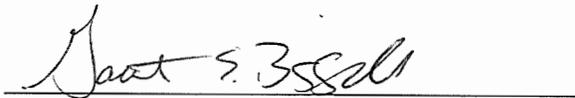
2460-000 and -001 on November 19, 2021. Finally, I participated in developing the NYISO Motion.

8. With regard to the NYISO Motion, I provided guidance on (a) the NYISO's software development efforts and timeline; (b) the challenges encountered by NYISO staff in developing and implementing DER and Aggregations in the NYISO-administered markets; and (c) the NYISO's collaboration with New York's distribution utilities.
9. I helped develop the explanation of the past and current challenges the NYISO has faced in the development of its DER and Aggregation implementation efforts. The concerns the NYISO explained in the NYISO Motion were previously raised in other pleadings in Docket Nos. ER19-2276 and ER21-2460 that I participated in developing.
10. I have reviewed the facts stated in the NYISO Motion, and I have personal knowledge of and helped develop the factual statements contained in the NYISO Motion. The factual statements set forth in the NYISO Motion are true and correct to the best of my information, knowledge, and belief.
11. This concludes my affidavit.

Executed on this 15<sup>th</sup> day of November, 2022.



Michael A. DeSocio  
Director, Market Design  
New York Independent System Operator, Inc.  
10 Krey Boulevard  
Rensselaer, New York 12144



Garrett E. Bissell  
Notary Public, State of New York

My Commission Expires: 9/19/2025

GARRETT E. BISSELL  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 02B16133400  
Qualified in Albany County  
My Commission Expires 09-19-2025

## **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 15<sup>th</sup> day of November 2022.

*/s/ Mitchell W. Lucas*

Mitchell W. Lucas  
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