

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

<b>Revisions to the Filing Process</b>	)	
<b>And Data Collection for the</b>	)	<b>Docket No. RM23-9-000</b>
<b>Electric Quarterly Report</b>	)	

**COMMENTS OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

Pursuant to the Notice of Proposed Rulemaking issued by the Federal Energy Regulatory Commission (“Commission”) on October 19, 2023, in the above-referenced docket (“EQR NOPR”),<sup>1</sup> the New York Independent System Operator, Inc. (“NYISO”) hereby submits its comments in response to the EQR NOPR.

The NYISO supports the Commission’s overall goals of improving and streamlining the Electric Quarterly Report (“EQR”) submission process. The NYISO operates a Customer Settlements Data Mart (“Data Mart”), which has for many years provided Market Participants with settlements data and functionality to support their EQR reporting compliance efforts. The NYISO respectfully requests that the Commission implement requirements that allow regional transmission organizations (“RTO”) and independent system operators (“ISO”) that already have robust tools and processes available to their Market Participants to support their EQR reporting obligations to continue to leverage those existing tools to the greatest extent possible. The NYISO also requests that the Commission implement a compliance schedule, which may include new or revised obligations on RTO/ISOs, that allows ample time to address and accommodate regional variations in settlement data, data descriptions, and technologies in the final

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<sup>1</sup> *Revisions to the Filing Process and Data Collection for the Electric Quarterly Report*, 185 FERC ¶ 61,043 (2023).

requirements. The NYISO believes that incorporating these considerations in the development of potential requirements for RTOs/ISOs will help to achieve the goals of the EQR NOPR without unnecessary time and expense.

## **I. COMMUNICATIONS AND CORRESPONDENCE**

All communications and correspondence concerning these comments should be directed to:

Robert E. Fernandez, Executive Vice President, General Counsel &  
Chief Compliance Officer  
Karen G. Gach, Deputy General Counsel  
Raymond Stalter, Director, Regulatory Affairs  
\*Amie Jamieson, Senior Attorney/Registered In-House Counsel  
10 Krey Boulevard  
Rensselaer, NY 12144  
Tel: (518) 356-6000  
Fax: (518) 356-7678  
Email: [ajamieson@nyiso.com](mailto:ajamieson@nyiso.com)

\*Person designated for receipt of service.

## **II. COMMENTS**

### **A. The NYISO Requests that the Commission Consider Existing Systems for Providing EQR Reporting Data When Developing New Requirements.**

The NYISO has for many years offered Market Participants settlement data in a way that supports the goals of the EQR NOPR. Since 2003, the NYISO has offered its Market Participants access to a Data Mart, which was developed to assist Market Participants in the reconciliation of their invoices. As recently as 2020, the NYISO completed a multi-year effort to upgrade the Data Mart and migrate it to a more modern platform and architecture. The Data Mart allows Market Participants to extract customer settlement data for generator, load, and scheduled transaction settlements, develop standardized reports, build custom queries of their settlement data, and use an Automated Data Delivery file of data for upload to third-party systems. To support Market Participant data needs associated with their EQR reporting

obligations, the NYISO developed within this Data Mart a template for EQR-related data retrieval. With this template, Market Participants can more easily extract data necessary to meet their EQR reporting obligations.

The NYISO built and upgraded the Data Mart with strong support from its Market Participants, and Market Participants heavily rely on it for customer settlement and EQR reporting needs. The NYISO has received favorable feedback from Market Participants that the Data Mart stands out in the industry as a best-in-class solution to settlement data needs.

Given the flexibility of the reporting functions of the Data Mart, including a specific EQR template, the NYISO believes its existing system already addresses many of the concerns addressed in the EQR NOPR. The NYISO is, however, open to discussing the steps required to provide EQR-related data to Market Participants in a new data format as prescribed in a final rule. The NYISO requests that any new filing or formatting requirements allow the NYISO and similarly-situated RTOs/ISOs to leverage existing systems to continue to support Market Participant EQR reporting compliance obligations as much as possible.

**B. The NYISO Requests that the Process for Developing RTO/ISO Filing and Formatting Requirements Provide Sufficient Time to Evaluate and Accommodate Regional Differences.**

Wholesale electric market rules, settlement data, data descriptions, and technologies currently in use vary across the RTOs and ISOs. These variations may complicate efforts to require all RTOs/ISOs to produce conforming transaction data reports using Commission EQR taxonomies in the XBRL-CSV standard. The Commission should consider these wholesale electric market variations when establishing data requirements in a final rule in this proceeding.

The Commission reflected upon such regional variations and adjusted the final rule to accommodate them when it issued Order 760 requiring RTOs/ISOs to electronically deliver

market data to the Commission on an ongoing basis.<sup>2</sup> In that order, the Commission stated: “requiring data delivery in a consistent format for all RTOs and ISOs likely would be more costly and may result in data that fails to accurately capture the nuances of each market.”<sup>3</sup> Based on this finding, the Commission added language to the final rule stating that the data submission by RTOs/ISOs would be “in a form and manner consistent with [the RTO’s/ISO’s] own collection of data.”<sup>4</sup> In establishing new or modified data reporting obligations in this proceeding, the Commission should similarly consider these variations and address them in a way that avoids unnecessary implementation time and costs for RTOs/ISOs.

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<sup>2</sup> *Enhancement of Electricity Market Surveillance and Analysis through Ongoing Electronic Delivery of Data from Regional Transmission Organizations and Independent System Operators*, 139 FERC ¶ 61,053 (2012).

<sup>3</sup> *Id.* ¶ 40.

<sup>4</sup> *Id.* at ¶¶ 39-40.

### III. CONCLUSION

The NYISO respectfully requests that the Commission consider these comments in formulating any final rule in this proceeding.

Respectfully submitted,

/s/ Amie Jamieson

Amie Jamieson

Senior Attorney/

Registered Corporate Counsel

New York Independent System Operator, Inc.

Dated: February 26, 2024

cc: Janel Burdick  
Emily Chen  
Matthew Christiansen  
Jignasa Gadani  
Jette Gebhart  
Leanne Khammal  
Jaime Knepper  
Kurt Longo  
David Morenoff  
Douglas Roe  
Eric Vandenberg

## **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 26<sup>th</sup> day of February 2024.

/s/ Elizabeth Rilling

Elizabeth Rilling  
New York Independent System Operator, Inc.  
10 Krey Blvd.  
Rensselaer, NY 12144  
(518) 356-6177