

April 16, 2024

Submitted Electronically

Honorable Debbie-Anne A. Reese
Acting Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, D.C. 20426

Re: *New York Independent System Operator, Inc.*, Compliance Filing, Submission of
Tariff Records for the Distributed Energy Resource and Aggregation Participation
Model; Docket No. ER19-2276-000, *et al.*

Dear Acting Secretary Reese:

In accordance with the requirements of the Federal Energy Regulatory Commission's January 23, 2020 *Order Accepting Tariff Revisions and Directing Compliance Filing and Informational Report* (January 2020 Order)¹ and April 21, 2020 Delegated Letter Order (April 2020 Order),² and as explained in the New York Independent System Operator, Inc.'s ("NYISO") September 29, 2023, Notice Establishing Effective Date ("Notice of Effective Date"),³ and October 19, 2023, Notice of Delayed and Revised Effective Date ("Notice of Revised Effective Date"),⁴ the NYISO submits this filing to affix an effective date of April 16, 2024, to the accepted tariff records that integrate Distributed Energy Resources ("DER") and Aggregations in the NYISO-administered wholesale markets. The tariff records being submitted today in this docket, combined with the tariff revisions accepted by the Commission in Docket No. ER23-2040-000, *et al.* that became effective on April 16, 2024,⁵ comprise the NYISO's DER and Aggregation Participation Model.

As described in Part II below, in the Notice of Effective Date, and the Notice of Revised Effective Date, the NYISO did not terminate the Demand Side Ancillary Services Program ("DSASP") and Day-Ahead Demand Response Program ("DADRP") on April 16, 2024. Instead,

¹ *New York Indep. Sys. Operator, Inc.*, Order Accepting Tariff Revisions and Directing Compliance Filing and Informational Report, 179 FERC ¶ 61,033 (Jan. 23, 2020).

² *New York Indep. Sys. Operator, Inc.*, Docket No. ER19-2276-003 (Apr. 21, 2020) (unpublished letter order) ("2020 Letter Order").

³ *New York Indep. Sys. Operator, Inc.*, Notice Establishing an Effective Date for the Distributed Energy Resource and Aggregation Participation Model, Docket No. ER19-2276-000, *et al.* (Sept. 29, 2023).

⁴ *New York Indep. Sys. Operator, Inc.*, Notice of Delayed and Revised Effective Date Applicable to the Implementation of the Distributed Energy Resource and Aggregation Participation Model, Docket No. ER19-2276-000, *et al.* (Oct. 19, 2023).

⁵ *New York Indep. Sys. Operator, Inc.*, Order Accepting Tariff Revisions, 187 FERC ¶ 61,022 (Apr. 15, 2024).

the NYISO will submit a separate notice of effective date at least two weeks ahead of the termination of those programs.

I. Documents Submitted with this Filing Letter

1. A clean version of the accepted revisions to the Open Access Transmission Tariff (“OATT”) with an effective date of April 16, 2024 (“Attachment I”);⁶
2. A clean version of the accepted revisions to the Market Administration and Control Area Services Tariff (“Services Tariff”) with an effective date of April 16, 2024 (“Attachment II”); and
3. An exhibit showing language related to the DSASP and DADRP that will remain effective until the expiration of the transition period described below (“Attachment III”).

II. Notice of Effective Date

In compliance with the January 2020 Order⁷ and April 2020 Order,⁸ and except as identified in Attachment III, the NYISO hereby submits tariff records for its DER and Aggregation participation model reflecting an effective date of April 16, 2024. Making the DER and Aggregation tariff revisions effective on that date will allow Aggregators to begin enrolling DER and Aggregations on April 16, 2024, and begin offering services to the wholesale market after completing the applicable enrollment processes.

As described in the NYISO’s June 1, 2023, submission in Docket No. ER23-2040-000 (the “June 1 Filing”), certain proposed tariff revisions in this proceeding associated with the termination of the DSASP and DADRP are expected to become effective twelve (12) months after the DER and Aggregation Participation Model becomes effective on April 16, 2024.⁹ This transition period will allow existing DSASP and DADRP resources to remain participants in the NYISO-administered markets while completing the DER and Aggregation registration and enrollment processes and establishing the required metering and telemetry infrastructure. If unforeseen circumstances arise that would materially impact the ability of DSASP and/or DADRP Resources to complete the transition process within twelve months, the NYISO may lengthen the twelve-month transition window.

The NYISO is not proposing an effective date for the tariff revisions terminating the DSASP and DADRP identified in Attachment III at this time and will submit a Notice of Effective Date for those tariff revisions at least two weeks before the tariff revisions become

⁶ The OATT and Services Tariff records submitted in this docket with an effective date of April 16, 2024, reflect the accepted DER and Aggregation tariff language layered on top of the NYISO’s currently effective tariff.

⁷ *New York Indep. Sys. Operator, Inc.*, Order Accepting Tariff Revisions and Directing Compliance Filing and Informational Report, 179 FERC ¶ 61,033 (Jan. 23, 2020).

⁸ *New York Indep. Sys. Operator, Inc.*, Docket No. ER19-2276-003 (Apr. 21, 2020) (unpublished letter order) (“2020 Letter Order”).

⁹ *New York Indep. Sys. Operator, Inc.*, Proposed Tariff Revisions Regarding the Participation of Distributed energy Resources and Aggregations, Docket No. ER23-2040-000, *et al.* (June 1, 2023) at 22-23 (“June 1 Filing”).

effective. The highlighted deletions in Attachment III are not being made effective at this time and are proposed to become effective following the twelve-month transition period for the DSASP and DADRP programs.¹⁰

III. 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, 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.

IV. Conclusion

The New York Independent System Operator, Inc. respectfully requests that the Commission accept this compliance filing and the applicable tariff records.

Respectfully submitted,

/s/ Gregory J. Campbell

Gregory J. Campbell, Senior Attorney
New York Independent System Operator, Inc.

cc:	Janel Burdick	Jette Gebhart	David Morenoff
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¹⁰ Please note that the tariff records submitted with this filing include certain ministerial clarifications. Due to the DSASP/DADRP to DER transition period (which the NYISO developed with its stakeholders after the original submission of the tariff revisions in 2019), the NYISO will temporarily retain certain terms that were originally expected to be replaced. For example, the NYISO proposed to replace the term "Demand Side Resources" with "Aggregations" in the definition of "Base Point Signals" in Services Tariff Sec. 2.2: "Electronic signals sent from the ISO and ultimately received by Generators or ~~Demand Side Resources~~ Aggregations specifying the scheduled MW setpoint for the Generator or Aggregation. Real-Time Dispatch ("RTD") Base Point Signals are typically sent to Generators or ~~Demand Side Resources~~ Aggregations on a nominal five (5) minute basis. AGC Base Point Signals are typically sent to the Generators or ~~Demand Side Resources~~ Aggregations on a nominal six (6) second basis." In this instance, and in others like it throughout the Services Tariff, the NYISO has inserted a slash between the term being retained for DSASP/DADRP ("Demand Side Resource") and the new term applicable to the DER and Aggregation participation model ("Aggregation"): "Electronic signals sent from the ISO and ultimately received by Generators or Demand Side Resources/Aggregations" the NYISO will remove the slash when the applicable DSASP/DADRP term is removed, consistent with the NYISO's transition plan described in Part II of this filing letter.

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 16th day of April 2024.

/s/ Elizabeth Rilling

Elizabeth Rilling
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