

August 22, 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; Docket No.
ER24-2096-00__

Dear Acting Secretary Reese:

On May 24, 2024, the New York Independent Operator, Inc. (“NYISO”) submitted proposed revisions to its Market Administration and Control Area Services Tariff (“Services Tariff”) to modify certain rules applicable to Installed Capacity (“ICAP”) Suppliers (“May 2024 Filing”).¹ The Federal Energy Regulatory Commission (“Commission”) accepted the NYISO’s proposed tariff revisions, subject to condition, in a July 23, 2024, Order (“July 2024 Order”).² In that Order, the Commission directed the NYISO to submit a compliance filing modifying the implementation timeline for a series of proposed revisions related to the Capacity Accreditation framework for Generators with fuel constraints.³ The NYISO submits this filing in compliance with the Commission’s directive in the July 2024 Order.

I. List of Documents Submitted

The NYISO submits the following documents with this filing letter:

1. A blacklined version of the NYISO Services Tariff sections containing the proposed compliance modifications (“Attachment I”); and
2. A clean version of the NYISO Services Tariff sections containing the proposed compliance modifications (“Attachment II”).

¹ *New York Indep. Sys. Operator, Inc.*, Proposed Tariff Revisions Related to Modeling Improvements for Capacity Accreditation Gas Constraints and Correlated Derates, and to ICAP Supplier Bidding Requirements, Docket No. ER24-2096-000 (May 24, 2024) (“May 2024 Filing”).

² *New York Indep. Sys. Operator, Inc.*, Order Accepting Tariff Revisions Subject to Condition, 188 FERC ¶ 61,051 (Jul. 23, 2024) (“July 2024 Order”).

³ *Id.* at P 22.

II. Background

In the May 2024 Filing, the NYISO proposed to (i) modify ICAP Supplier Day-Ahead Market bidding obligations, (ii) eliminate a category of Generators known as “Capacity Limited Resources,” (iii) adjust certain rules related to the treatment of Energy Limited Resources in the Day-Ahead and Real-Time Markets, and (iv) implement new rules amending the Capacity Accreditation framework for Generators with fuel constraints. The NYISO proposed that the majority of the tariff revisions, including the Capacity Accreditation rules applicable to Generators with fuel constraints (the “Fuel Constraints Rules”), become effective for the 2025-2026 Capability Year.⁴

On June 14, 2024, Ravenswood Operations, LLC (“Ravenswood”) and Independent Power Producers of New York, Inc. (“IPPNY”), separately, submitted comments on the May 2024 Filing, requesting that the implementation timeline for the Fuel Constraints Rules be delayed from the 2025-2026 Capability Year to the 2026-2027 Capability Year.⁵ The NYISO did not oppose IPPNY’s and Ravenswood’s requests. The NYISO advised the Commission that, if the requested delay was granted, the NYISO would submit revised tariff records reflecting the delay. Consistent with the Commission’s directive in the July 2024 Order, the NYISO submits this compliance filing and proposed tariff revisions to modify the implementation timeline.

III. Proposed Tariff Revisions

In this filing, the NYISO submits proposed revisions to Services Tariff Sections 5.12 and 5.14. The proposed revisions modify the implementation timeline for the Fuel Constraints Rules from the 2025-2026 Capability Year to the 2026-2027 Capability Year in compliance with the July 2024 Order.⁶

⁴ May 2024 Filing at 4.

⁵ Ravenswood Operations, LLC June 14, 2024 Comments, Docket No. ER24-2096-000, at 11. Independent Power Producers of New York, Inc. June 14, 2024 Comments and Request for One Year Extension of Implementation of Gas Constraints Capacity Accreditation Rules, Docket No. ER24-2096-000, at 12.

⁶ Proposed revisions to Services Tariff Sections 5.12.1.15, 5.12.6.2.2, 5.12.8, 5.12.15, and 5.14.2.3.5.

IV. Effective Date

In the May 2024 Filing, the NYISO proposed an effective date of July 24, 2024.⁷ In the July 2024 Order, the Commission accepted the proposed Services Tariff revisions effective July 24, 2024, subject to the NYISO's submittal of the instant compliance filing.⁸ The NYISO, therefore, requests that the Commission accept the proposed revisions to Services Tariff Sections 5.12 and 5.14 submitted in this compliance filing to become effective on July 24, 2024.

V. Service

The NYISO will send an electronic copy of this filing to the official representative of each party to this proceeding, the New York State Public Service Commission, and the New Jersey Board of Public Utilities. The NYISO will also send an electronic link to this filing to the official representative of each of its customers, and each participant on its stakeholder committees. In addition, the NYISO will post a copy of this filing on its website at www.nyiso.com.

VI. Conclusion

The NYISO respectfully requests that the Commission accept this compliance filing and requested effective date.

Respectfully submitted,

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

cc:	Janel Burdick	Douglas Roe
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⁷ May 2024 Filing at 12.

⁸ July 2024 Order at Ordering Paragraph (A).

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 22nd day of August 2024.

/s/ Alexander Morse

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