UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Implementation of Dynamic Line Ratings

Docket No. RM24-6-000

ADVANCED NOTICE OF PROPOSED RULEMAKING COMMENTS OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.

The New York Independent System Operator, Inc. ("NYISO") respectfully submits comments in response to the *Advanced Notice of Proposed Rulemaking* in the above-captioned proceeding issued by the Federal Energy Regulatory Commission ("Commission") on June 27, 2024 ("Notice").¹ In its comments, the NYISO addresses certain questions raised in the Commission's Notice regarding whether the lack of Dynamic Line Rating ("DLR") requirements renders current wholesale rates unjust and unreasonable and the potential path to developing and implementing DLR requirements. The NYISO appreciates the opportunity to work with the Commission and Commission staff through the submission of these written comments.

Wholesale energy rates in the NYISO-administered markets are not rendered unjust and unreasonable by the lack of generally applicable DLR requirements, as those requirements are described in the Notice. The currently effective seasonal transmission line ratings and the NYISO's existing functionality to accept ambient-adjusted ratings ("AARs") or other updated ratings in the real-time commitment and dispatch solutions, until the rating is further updated or removed by the Transmission Owner, support efficient wholesale markets and reliable system operations. These rules provide the flexibility needed for the NYISO and New York Transmission Owners to utilize the transmission system efficiently and to effectively respond to

¹ Implementation of Dynamic Line Ratings, *Advanced Notice of Proposed Rulemaking*, Docket No. RM24-6-000 (June 27, 2024).

real-time system conditions. While the current rules are just and reasonable, the NYISO is also committed to implementing its compliance plan in response to FERC Order No. 881, which will improve the accuracy and transparency of electric transmission line ratings by implementing hourly AARs on the transmission lines over which the NYISO and the Transmission Owners in New York provide transmission service.² Given the existing transmission infrastructure in New York, the current transmission line rating system, the NYISO's market design features, and the operational approach in New York, there is currently no demonstration that additional DLR requirements are necessary to efficiently utilize the New York State Transmission System. Further, any benefits that would flow from the DLR requirements contemplated in the Notice are unknown and difficult to quantify.

The NYISO strongly encourages the Commission to allow each Independent System Operator ("ISO") and Regional Transmission Organization ("RTO") to implement its FERC Order No. 881 compliance plan and gain experience with the impacts of hourly AAR requirements prior to the consideration of further issues and potential rules noted in this proceeding. As the ISOs/RTOs and other affected parties continue to develop and implement region-specific compliance approaches in response to FERC Order No. 881, it is not clear that the DLR requirements contemplated in the Notice would provide measurable benefits to the ISOs/RTOs, asset owners, electric system reliability, or consumers. The issues raised in the Notice should be reviewed on a region-by-region basis after the FERC Order No. 881 AAR requirements are implemented to determine if there is a need to further expand the requirements related to managing transmission line ratings. If, at that time, DLRs are expected to provide significant benefits beyond existing transmission line rating approaches, the NYISO encourages

² See Managing Transmission Line Ratings, Final Rule, 177 FERC ¶ 61,179 (2021) (FERC Order No. 881).

the Commission to provide flexibility for the ISOs/RTOs and Transmission Owners to identify where and when DLRs could provide value to the transmission systems they manage.

I. COMMENTS

A. NYISO's Use of Transmission Line Ratings and Planned Compliance with FERC Order No. 881 Facilitate Just and Reasonable Wholesale Electric Rates

The NYISO's Day-Ahead and Real-Time Markets collectively facilitate sufficient generation commitments and efficient transmission utilization to maintain electric system reliability. Market design features that ensure adequate flexibility and the scheduling and commitment of sufficient resources to maintain reliability include: (i) the NYISO's Security Constrained Unit Commitment ("SCUC") software used for the Day-Ahead Market evaluation, which specifically includes a reliability pass to schedule generation to meet load; and (ii) the NYISO's Real-Time Market software, which is comprised of a Real-Time Commitment ("RTC") and a Real-Time Dispatch ("RTD"). Both SCUC and RTC award transmission service to resources with economic Energy and Transaction schedules. These market design features maximize efficient use of the transmission system and are regularly reviewed and refined to improve efficiency, reduce out-of-market actions, and reduce charges to consumers.

Reliability is the cornerstone of establishing and administering wholesale electricity markets. The NYISO Day-Ahead Market ("DAM") incorporates both financial and reliability passes to present a secure day-ahead plan to the system operators. To avoid the risk of an unanticipated reduction in transmission capability, and potentially a real-time reliability concern, the NYISO currently uses the seasonal ratings (*i.e.*, summer and winter seasonal ratings) in the DAM³ and, in the future, will use AARs pursuant to FERC Order No. 881. The known or

³ The NYISO Operating Committee reviews and approves the transfer limits developed by the NYISO through the seasonal study process.

predictable nature of transmission line ratings⁴ is informative to Market Participants, enabling them to effectively compete in the NYISO-administered wholesale electricity market. Market participants utilize the NYISO's financial transmission reservation system when offering energy supply to serve demand and satisfy reliability rules.⁵ The NYISO's financial transmission reservation system facilitates competition to effectively maximize use of the New York State Transmission System.

The NYISO's SCUC process includes a reliability pass to provide that sufficient supply resources are committed Day-Ahead to meet forecasted load. The reliability pass commits any additional supply resources and schedules the necessary transmission service, through the economic commitment software, that are needed to make up any difference between the load bid into the DAM and the NYISO's forecasted load requirements. This functionality commits the generation and schedules the transmission service necessary to meet demand through a competitive process that has significantly reduced the need for out-of-market actions in realtime.

The NYISO's Real-Time Market, which is comprised of RTC and RTD, performs a unique *ex ante*, simultaneously co-optimized, multi-period commitment, scheduling and dispatch process that evaluates bids and offers submitted by internal resources and external transactions to simultaneously solve for all Load, External Interchange Schedules, Operating Reserves and Regulation Service requirements while satisfying transmission constraints in order to minimize

⁴ The NYISO's compliance approach under FERC Order No. 881 requires the NYISO to maintain a database of Transmission Owner transmission line ratings and transmission line rating methodologies on its OASIS site or another password-protected website.

⁵ Market Participants that utilize the transmission system through the NYISO's financial reservation system are able to understand and predict transmission line ratings using the historical data and AAR calculation methodologies posted on its website after FERC Order No. 881 is implemented.

the total as-bid production costs. Both RTC and RTD include look-ahead functionality.⁶ This look-ahead functionality is intended to schedule the most efficient set of resources, recognizing both the current system conditions and expected future conditions.⁷ The software's forward-looking capability recognizes Energy and Transmission needs and availability. Resources are dispatched in a manner consistent with real-time system conditions, effectively utilizes the transmission system, and helps avoid the need for costly out-of-market action.

The twenty-four-hour Day-Ahead optimization and the real-time look-ahead tool both schedule resources and external interchange while considering transmission constraints based on the limits presented to the software at the time the look-ahead tool runs. The DAM and the Real-Time Market look-ahead runs utilize the entire transmission system capability presented to the software to schedule economic interchange or transfers from other parts of the system as part of its least cost mix of Ancillary Services and Energy from Suppliers.

In addition to these Energy market and reliability concerns, transmission line ratings play a significant role in the NYISO's electric system planning function. As part of its economic planning process, the NYISO regularly evaluates the electric system both with and without any transmission constraints to understand the impact of existing transmission limits on the delivery of Energy.⁸ This approach is the equivalent of having infinite transmission capability across the New York grid, which provides an understanding of "ideal" system behavior. In order to compare the ideal system to the existing physical limitations, the NYISO evaluates electric

⁶ RTC schedules Imports, Exports and internal (NYCA) resources every 15 minutes over a forward-looking 2.5-hour commitment window. The RTD optimization horizon is 55 to 60 minutes, depending on the interval.

⁷ Many market operators in ISO/RTO regions have real-time look-ahead tools embedded within their Real-Time Scheduling ("RTS") processes that schedule and forecast internal resources and external transactions.

⁸ A number of transmission development projects are now in service or are underway in New York that will facilitate more transmission capability throughout the state and reduce congestion constraints. For example, the Western New York and AC Transmission Public Policy Transmission Projects entered service in 2022 and 2023, respectively.

system congestion with the New York transmission limits reset to their actual values. The difference in annual generation (or hourly generation, depending on the study) by resource type and location informs an estimate of the resources that cannot deliver Energy at times due to existing transmission limits and constraints. While transmission constraints in parts of New York can, at times, limit the transfer of energy from certain parts of the state to other parts of the state, such constraints are not driven by unreasonably or artificially low transmission line ratings.

The NYISO also has existing functionality to receive updated ratings from Transmission Owners in real time, when appropriate. Asset owners may increase or decrease real-time line ratings on a majority of the Bulk Electric System ("BES") equipment in New York for any reason they deem appropriate using this functionality.⁹ Transmission Owners submit the updated ratings to the NYISO via the Inter-control Center Communications Protocol ("ICCP") secure communications tool. Accepted line rating data is used in the Real-Time Market commitment and dispatch solutions until the rating is further updated or removed by the Transmission Owner.

The NYISO accepts updated rating from asset owners for use in the Real-Time Market commitment and dispatch solutions and the Energy Management System ("EMS") Security analysis functions.¹⁰ Currently, the set of facilities that generally utilize this functionality is almost exclusively comprised of underground cables, and the ratings are not modified frequently. The underground cable asset owners typically adjust ratings in response to line-specific operating

⁹ The NYISO does not have visibility into the technology that the New York Transmission Owners rely on or have deployed to determine updated ratings.

¹⁰ The Energy Management System ("EMS") is used by the system operators to monitor the reliable operation of the grid and for situational awareness. It includes applications that monitor flows, voltages and perform contingency analyses, such as security monitor, state estimator, outage monitoring, as well as automatic generation control. The NYISO also employs a Business Management System ("BMS"), which is the suite of applications that comprise the Security-Constrained Unity Commitment ("SCUC"), Real-Time Commitment ("RTC") and Real-Time Dispatch ("RTD") software. This software is used to develop schedules and prices for the NYISO's Energy and Ancillary Services markets.

conditions (*e.g.*, thermal issues in the oil-filled pipe) and do not generally vary in response to other factors.

This approach has proven beneficial to the NYISO, the Transmission Owners, and consumers in New York. However, the NYISO does not envision significant additional benefits from expanded DLR requirements. In fact, DLRs that change frequently and cannot be forecasted, especially those that would reduce ratings, may be detrimental to the financial reservation system that the NYISO uses to support transmission service, transmission system security, and efficient price formation. The NYISO commented on the potential negative impacts of DLR requirements in advance of FERC Order No. 881 and seeks to incorporate those comments into this proceeding, as the Commission did in its DLR Notice of Inquiry.¹¹

B. The NYISO's Financial Transmission Model Raises Questions about the Benefits of DLR Requirements and Warrants Regional Flexibility for Managing Transmission Line Ratings

The NYISO's "financial reservation" transmission model differs substantially from the "physical reservation" transmission model contemplated by FERC Order Nos. 888 and 890 *pro forma* OATT.¹² Firm transmission service within the New York Control Area ("NYCA") is scheduled "implicitly" when customers receive Energy schedules from the NYISO. There are no express reservations of physical transmission service within the NYISO control area.

Unlike markets that rely on "physical" (MW) reservations of ramp and transfer capability, the NYISO does not permit Market Participants to pre-reserve ramp or transfer

¹¹ See Notice of Inquiry Comments of the New York Independent System Operator, Inc., Docket No. AD22-5 (filed April. 25, 2022). See also Implementation of Dynamic Line Ratings, Notice of Inquiry, 178 FERC ¶ 61,110 (2022) Docket No. AD22-5-000 at P 4.

¹² See New York Independent System Operator, Inc., 123 FERC ¶ 61,134 (2008), at PP 8-13; New York Independent System Operator, Inc., Letter Order on Compliance Filing, Docket No. OA08-13-003 (November 12, 2008); New York Independent System Operator, Inc., Compliance with Order No. 890, Docket No. OA08-13-000 (April 11, 2008); New York Independent System Operator, Inc., Compliance Filing, Docket No. OA08-13-000 (October 11, 2007).

capability. Instead, the NYISO awards firm transmission service to economically committed resources, including External Transactions. In the NYISO's Real-Time Market software, internal New York generation resources compete with External Transactions (Imports, Exports and Wheels-Through) to be economically awarded an Energy schedule, and therefore, the necessary transmission service and ramp schedule. All desired uses of the transmission system are scheduled to the extent that customers are willing to pay congestion charges (some of which can be hedged using financial transmission rights). This approach directly incorporates expected transmission system congestion and transmission service into the market software evaluations and permits the NYISO to meet demand obligations at the lowest production cost.

The NYISO has previously described to the Commission how its customers' ability to schedule transactions is, with certain limited exceptions,¹³ not limited by a pre-defined amount of Available Transfer Capability ("ATC") as under the *pro forma* OATT. Instead, the entire capacity of the New York State Transmission System is made available prior to the start of each DAM cycle. The ATC is calculated and posted based on the transactions accepted in the DAM. If a posted ATC value is zero, that value indicates that an interface is congested, and that additional transmission capacity would not be available absent redispatch in the Real-Time Market. However, it may still be possible for the NYISO to schedule additional transactions for customers that are willing to pay the applicable congestion charges.

¹³ The NYISO previously accommodated "Pre-Scheduled Transaction Requests" across External Interfaces, which could be submitted in the Day-Ahead Market up to 18 months in advance of the Dispatch Day. If a customer arranged for a Pre-Scheduled Transaction, it would obtain a special priority reservation in the Day-Ahead Market that would necessitate a reduction in the ATC posted for the relevant External Interface. The NYISO's Pre-Scheduled Transaction Request procedure, however, went essentially unused for many years, and the Commission recently accepted the NYISO's proposal to eliminate it. *See Tariff Amendments to Eliminate Pre-Scheduled Transaction Capability*, Letter Order, Docket No. ER10-2517-000 (November 2, 2010). The NYISO also supports "Advance Reservations" on specific designated controllable "Scheduled Lines" between the NYISO and certain neighboring entities. Scheduled Lines allow for Advanced Reservations on a basis that would be limited by a predefined amount of ATC. With one exception, however, other ISOs/RTOs are responsible for calculating ATC for each of the existing Scheduled Lines.

Consequently, the information conveyed by NYISO ATC postings is markedly different from that conveyed by such postings in areas with physical reservation regimes. The ATC within the NYISO represents the transmission capability that is left over after all scheduled transactions have been accommodated. Stated differently, ATC is used only as an instantaneous indication of the existence of uncongested transmission paths, and not as a determinant of whether additional requests for transmission service can be satisfied. Based on numerous compliance filings under FERC Order Nos. 890 and No. 890-A and various waivers filed and approved by the Commission,¹⁴ the NYISO is not obligated to maintain and post the same OASIS-related information as RTOs and ISOs with a physical reservation transmission system.

The NYISO offers these comments to remind the Commission of the financial transmission system and related circumstances in New York and to urge the Commission to be mindful of them in devising any new transmission-focused requirements. Any new requirements should account for regional flexibility based on the existing, approved approaches in various regions. If the Commission proceeds with the additional DLR requirements, the NYISO strongly recommends that any new transmission line rating-related rules be considered after FERC Order No. 881 is fully implemented and be sufficiently flexible to accommodate the NYISO's financial reservation transmission model, as well as other regional differences among the ISOs/RTOs.

¹⁴ Request for Limited OASIS Waivers, Docket No. EL99-77-000 (July 9, 1999), at pp 5-6; see also New York Independent System Operator, Inc., Filing in Compliance with May 7, 2008 Order, Docket No. OA08-13-003 (June 6, 2008), at pp 4-6; New York Independent System Operator, Inc., Filing in Compliance with Order No. 890-A, Docket No. OA08-107-000 (April 15, 2008), at pp 8-11; see also New York Independent System Operator, Inc., 130 FERC ¶ 61,104 (2010), at PP 9-14. See New York Independent System Operator, Inc., Letter Order, Docket Nos. ER11-2048-003, -004 (June 6, 2011); New York Independent System Operator, Inc., 133 FERC ¶ 61,208 (2010), at PP 12-13 (granting the NYISO's amended waiver request from OASIS posting requirements that were incompatible with the NYISO's transmission service); New York Independent System Operator, Inc., 132 FERC ¶ 61,239 (2010), at P 22; New York Independent System Operator, Inc., 125 FERC ¶ 61,274 (December 5, 2008), at PP 8-13; New York Independent System Operator, Inc., 127 FERC ¶ 61,005 (2009), at P 7; New York Independent System Operator, Inc., 125 FERC ¶ 61,275 (2008); New York Independent System Operator, Inc., 94 FERC ¶ 61,215 (2001), at P 61,795; Central Hudson Gas & Electric Corp., 88 FERC ¶ 61,253 (1999).

C. ISOs/RTOs Should Implement and Gain Experience with Their Market Structures Incorporating the FERC Order No. 881 Requirements Prior to Imposition of Further Ratings Requirements

1. Benefits of Dynamic Line Ratings in the New York Control Area are Unknown at this Time

The currently effective seasonal transmission line ratings, the existing functionality for asset owners to update ratings, and the forthcoming FERC Order No. 881 market design support effective system planning, efficient markets, reliable system operation, and the flexibility needed for NYISO and Transmission Owner operators to respond to real-time system conditions.

Expansive implementation of DLRs in New York, in addition to the new AAR requirements in FERC Order No. 881, is not expected to provide significant benefits to the NYISO, asset owners, or electric system reliability. Including more variables in transmission line rating determinations, such as difficult to predict weather parameters like wind speed or cloud cover, could introduce reliability issues and market inefficiencies by unnecessarily reducing the expected transmission line ratings. As discussed in the NYISO's Docket No. RM20-16 comments, DLRs that change frequently or *cannot be accurately forecasted*, especially those that reduce line ratings in real time, may be detrimental to system security, harm efficient price formation, and increase uplift costs.¹⁵ The use of DLRs should only be utilized on an appropriate set of facilities and under certain, real-time circumstances, as the Transmission Owners do today or as the Transmission Should allow sufficient time for the NYISO and market participants in New York to implement the AAR changes that are underway pursuant to FERC

¹⁵ See Notice of Proposed Rulemaking Comments of the New York Independent System Operator, Inc., Docket No. RM20-16-000 at pp. 4-9 (March 22, 2021).

Order No. 881 before considering any further DLR requirements that may be appropriate for the different ISO/RTO regions.

2. Transmission Owners Are the Entities Best Suited to Identify DLR Opportunities in the Future

Transmission Owners in the NYCA own the physical transmission assets and are responsible for developing the transmission line ratings.¹⁶ As a result, these entities are intimately familiar with the capabilities and limitations of the transmission equipment. Decades of firsthand knowledge and experience put the Transmission Owners in the best position to identify opportunities where DLR deployments could best address an identified system need. However, even with this expertise, DLRs are not guaranteed in all cases to increase line ratings or provide financial benefits.

The costs of procuring, installing, and operating DLR equipment are far from insignificant and may or may not result in transmission line ratings that offset these upfront costs.¹⁷ As discussed in the Notice, throughout these comments, and in the comments submitted by the New York Transmission Owners, the benefits of DLRs are unknown at this time and very difficult to quantify without additional operating experience.¹⁸ Several pilot programs have installed DLR equipment on transmission lines where Transmission Owners in the NYCA expected to achieve increased line ratings from the use of DLRs. However, these pilot programs have produced somewhat mixed results. While several of the pilot programs did result in a meaningful increase in line ratings, on a couple of occasions they resulted in decreased line ratings. In addition, in instances where increased ratings were achieved, it is not always clear

¹⁶ The NYISO does not own any transmission equipment; it relies on the asset owners to provide transmission line ratings.

¹⁷ See e.g., Notice at PP 56-62.

¹⁸ See id.

how much of that increase would be gained from the implementation of the forthcoming AAR requirements and how much incremental gain would be achieved through the installation of DLR equipment, particularly if the pilot program is still on-going.¹⁹

The Transmission Owners' experiences demonstrate an overlap between the AARs under the FERC Order No. 881 requirements and any additional DLR requirements. As a result, further analysis of potential DLR requirements should occur after the Transmission Owners and ISOs/RTOs implement AAR requirements.²⁰ Any final action taken in this proceeding, after FERC Order No. 881 compliance strategies are implemented, should rely on the local expertise of Transmission Owners, in coordination with their respective ISOs/RTOs, to determine when and where to utilize DLRs.

D. Any Commission Action Should Be Driven by Transmission Owners and ISO Stakeholders and Accommodate Regional Differences

The NYISO-administered wholesale electricity markets continuously evolve to address changing system needs and capture the benefits of new technologies entering the grid, all while supporting reliability. Through ongoing, effective engagement with stakeholders, the NYISO continues to prepare the wholesale electricity markets of today for the needs of consumers tomorrow. Recognizing the importance of the Climate Leadership and Community Protection Act in New York and the pace of change from fossil fuel-fired resources to renewable resources, which are generally intermittent in nature, the NYISO is engaged in several critical efforts to support efficient market design and to maintain electric system reliability. Well-functioning wholesale electricity markets provide signals that incentivize the resource attributes needed to

¹⁹ The pilot programs may produce and utilize modified line ratings that will be determined by the AAR methodologies under FERC Order No. 881 or modified line ratings that are specifically attributable to DLR equipment.

²⁰ The NYISO and New York Transmission Owners expect to implement New York's compliance strategy under FERC Order No. 881 in December 2028. *See* Notice at P 8 and FN 20.

support a reliable and resilient power system. The changes to the generation resource mix are creating new challenges to the reliability and resilience of the power system and must be the focus of the NYISO's efforts in the near term. New York's wholesale electricity market must adapt to address these challenges and provide signals that support the resources needed to continue to support the reliable delivery of electricity.

Given the uncertainty of the need for and the benefits that could arise from DLR requirements in New York, the effort required to implement DLRs as contemplated in the Notice, and the number of critical efforts the NYISO is undertaking, the NYISO encourages the Commission to allow each ISO/RTO to work with its respective stakeholders to review the objectives outlined by the Commission and to determine if any changes are needed within that ISO's/RTO's market structure after FERC Order No. 881 is fully implemented. The Commission should not impose a uniform implementation process or timeline on all ISOs/RTOs ahead of understanding how FERC Order No. 881 compliance approaches impact transmission line ratings, energy markets, and real-time system operations. The NYISO strongly recommends that the Commission reevaluate the DLR concepts discussed in the Notice after FERC Order No. 881 is fully implemented.

Each ISO/RTO employs different power system modelling techniques, has different approaches to scheduling transmission service, employs different pricing methods, has different market rules, relies on a different mix of resources, including transmission equipment, and uses different software to implement its markets. The characteristics of each ISO's/RTO's commitment, dispatch and settlement processes should inform the decision of when and how to implement DLRs, if any expansion of today's practices is warranted. The Commission has recognized that ISOs and RTOs do not (and need not) have identical software or market rules for

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their markets and power systems to produce compatible results.²¹ The Commission has also recognized that the practical ability of each ISO or RTO to implement software changes, including the potential costs of making those changes, often justifies allowing ISOs/RTOs to comply with Commission mandates in ways that accommodate regional differences rather than insisting on "one-size fits all" solutions.²² Given all of the New York-specific circumstances discussed above, when DLR requirements are reconsidered, any line rating requirements should be sufficiently flexible to accommodate the NYISO's financial reservation transmission model, as well as other regional differences among the ISOs/RTOs.

The Commission should allow each ISO/RTO to review needs and prioritize the best approach for its region, based on the existing market constructs, the existing transmission equipment, and the to-be-determined impacts of FERC Order No. 881 compliance strategies.

II. COMMUNICATIONS AND CORRESPONDENCE

All communications regarding this filing should be directed to:

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²¹ See, e.g., New York Independent System Operator, Inc., 142 FERC ¶ 61,202 at PP 24-26 (2013) ("NYISO's compliance obligation does not require NYISO to redesign its market. [footnote omitted] This would be particularly unnecessary here where, as NYISO points out, it would be costly and economically inefficient to do so.")

²² Id. See also, New York Independent System Operator, Inc., 133 FERC ¶ 61,246 at P 25 (2010).

III. CONCLUSION

The NYISO respectfully submits these comments for the Commission's consideration.

Respectfully submitted,

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October 15, 2024

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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 15th day of October 2024.

/s/ Stephanie Amann

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