

May 2, 2025

**Submitted Electronically**

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

Re: *New York Independent System Operator, Inc.*, Compliance Filing to Conform  
Tariff Records; Docket No. ER25-\_\_\_\_-000

Dear Secretary Reese,

On November 15, 2024, the New York Independent System Operator, Inc. (“NYISO”) submitted an effective date notice (“November 15 Notice”) informing the Federal Energy Regulatory Commission (“Commission”) that it was prepared to implement certain Tariff rules filed in Docket No. ER24-2133-000 (“HSR/CSR Docket”), which were accepted pursuant to delegated authority with a flexible effective date, on December 3, 2024. The identified rules were made effective and implemented by the NYISO on December 3, 2024.

The Letter Order in the HSR/CSR Docket instructed the NYISO to use eTariff Filing Code 150 (Data Response/Supplement the Record) for its effective date submission.<sup>1</sup> Complying with the instruction in the Letter Order meant that the NYISO could not submit a Tariff record to accurately reflect actions the Commission took, or that the NYISO became aware of, in other dockets subsequent to the NYISO’s submission of proposed Tariff revisions in the HSR/CSR Docket. The NYISO included redlined changes to affected Tariff sections in Attachment A to its November 15 Notice that identified the necessary updates to ensure its stakeholders were adequately informed.

The NYISO submits this eTariff Filing Code 85 (Compliance Filing—New Docket) in order to incorporate the revisions that the NYISO identified in Attachment A to its November 15 Notice into the Commission’s official eTariff record.

Three of the Tariff sections the NYISO submitted with its HSR/CSR Filing need to be conformed to address subsequent Commission decisions in other dockets, and the timing of the NYISO’s implementation of those accepted Tariff revisions. None of the conforming changes relate to Tariff revisions that were proposed for the Commission’s consideration in the HSR/CSR Docket. Instead, they are changes that were proposed and accepted in Docket No. ER24-1655 (addressing enhancements to financial transaction capabilities and improvements to Fast-Start

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<sup>1</sup> *New York Indep. Sys. Operator, Inc.*, Docket No. ER24-2133-000 (July 23, 2024) (“Letter Order”).

Resource schedules), and in Docket No. ER24-2096 (addressing accreditation of resources in the capacity market).

The eTariff records attached to this submission contain clean revisions to Market Services Tariff Sections 2.3 and 5.12 that incorporate changes that were accepted by the Commission and made effective in Docket No. ER24-2096 after the NYISO submitted its HSR/CSR Filing.

The attached eTariff records also include clean revisions to Section 17.1 of the Market Services Tariff that remove changes that the NYISO proposed and the Commission accepted in Docket No. ER24-1655, but which the NYISO was not able to make effective by December 3, 2024.<sup>2</sup> The proposed revisions in Docket No. ER24-1655 were instead made effective March 18, 2025. Accordingly, (1) a clean version of Section 17.1, effective from December 3, 2024 to March 18, 2025 that does not include the Tariff revisions proposed in Docket No. ER24-1655 is submitted, along with (2) a clean version of the revisions to Market Services Tariff Section 17.1 that became effective on March 18, 2025.

This compliance filing is submitted to conform the Commission's official, electronic Tariff records with the Tariff revisions that the Commission has accepted for filing, applying the correct effective dates to all submitted revisions. Accepting this filing will improve the accuracy of the Commission's eTariff record. Because the changes identified in this filing were considered and accepted by the Commission subsequent to the submission of the Tariff records in ER24-2133-000, it is appropriate for the NYISO to submit a compliance filing to incorporate them into FERC's eTariff record.

## **I. Documents Submitted**

The eTariff records submitted with this filing contain the conforming eTariff revisions to Market Services Tariff Sections 2.3, 5.12 and 17.1 described above. In addition, the NYISO submits the following documents with this filing letter for informational purposes:

1. A clean version of the conforming revisions to the Market Services Tariff Sections 2.3, 5.12 and 17.1 described above ("Attachment I"); and
2. A blacklined version of the conforming revisions to the Market Services Tariff Sections 2.3, 5.12 and 17.1 described above ("Attachment II").

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<sup>2</sup> For additional information, please see the November 12, 2024, *Motion to Defer Effective Date and Request for Waiver* that the NYISO submitted in Docket No. ER24-1655.

## **II. 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.

## **III. Conclusion**

The New York Independent System Operator, Inc. respectfully requests that the Commission accept the attached, updated eTariff records.

Respectfully submitted,

/s/ Alex M. Schnell

Alex M. Schnell

Assistant General Counsel /

Registered Corporate Counsel

New York Independent System Operator, Inc.

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