



September 19, 2025

**Submitted Electronically**

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

Re: *New York Independent System Operator, Inc. and PJM Interconnection, L.L.C.*,  
Docket No. ER25-\_\_\_\_-000;  
Proposed Revisions to the Joint Operating Agreement Among and Between  
NYISO and PJM

Dear Ms. Reese:

Pursuant to Section 205 of the Federal Power Act,<sup>1</sup> the New York Independent System Operator, Inc., (“NYISO”) and PJM Interconnection, L.L.C. (“PJM”) (collectively the “RTOs”) submit, in electronic format, proposed revisions to the Joint Operating Agreement (“JOA” or “Agreement”) between NYISO and PJM that is set forth in Attachment CC to the NYISO’s Open Access Transmission Tariff (“NYISO OATT”).<sup>2</sup>

The JOA covers many important operational areas, including the Market-to-Market coordination process.<sup>3</sup> The JOA must maintain up-to-date, accurate information and establish clear expectations for both RTOs. To support the effective implementation of the JOA, the NYISO and PJM regularly review the terms of the Agreement to identify required updates or opportunities to improve the Agreement.

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<sup>1</sup> 16 U.S.C. §824d.

<sup>2</sup> Order No. 714, *Electronic Tariff Filings*, ¶ 31,276 (2008), and Section 35.1 of the Commission’s regulations, 18 C.F.R. § 35.1(a), allow multiple public utilities that are parties to the same tariff (e.g., a joint tariff such as the JOA) to designate one of the public utilities as the designated filer of the joint tariff. The designated filer submits a single tariff filing for inclusion in its database that reflects the joint tariff, along with the requisite certificates of concurrence from the other parties to the joint tariff. NYISO is the designated filing party for the JOA. Therefore, NYISO is submitting the JOA modifications in the instant filing along with PJM’s Certificate of Concurrence. The designation of the NYISO as the designated filer for the JOA is for administrative convenience and in no way shall limit PJM’s filing rights under the Federal Power Act as they relate to the JOA.

<sup>3</sup> Capitalized terms not otherwise defined herein have the meaning specified in Section 35.2.1 of the JOA.

The JOA revisions proposed in this filing add two non-common Phase Angle Regulators (“PARs”) to the list of facilities modeled in the Market Flow calculation to support an effective Market-to-Market (“M2M”) coordination process. NYISO and PJM staff worked together to develop the revisions proposed herein and obtained approval of the revisions from their respective stakeholders.

## **I. Background**

The RTOs’ M2M coordination process focuses on real-time market coordination to manage transmission limitations that occur on certain Flowgates in a cost-effective manner. Flowgates represent a transmission constraint modeled in either RTO’s system that, when binding, can be relieved through generator redispatch or the movement of PARs. Managing congestion on Flowgates requires an understanding of how energy flows on specified Flowgates. Therefore, the RTOs have rules to determine M2M Market Flows by calculating energy flows on a specified Flowgate resulting from dispatch of generating resources serving load within an RTO’s market.

M2M Market Flows are used to determine the amount of generator redispatch needed to relieve a binding Flowgate. The determination of M2M Market Flows is a data intensive process that requires consideration of PAR Effects on M2M Flowgates. There are two classes of PARs considered in the Market Flow calculation, Common PARs and Non-Common PARs. Common PARs are located at the NYISO/PJM border. Non-Common PARs can be located on the external border of either RTO apart from the NYISO/PJM border. The Non-Common PARs located at the New York/Ontario border are included in the existing JOA, St. Lawrence PARs.

Later this year, the NYISO expects to incorporate PARs on the New York/New England border into its market model, referred to as the Dover PARs. The NYISO is responsible for incorporating the impacts of the Non-Common PARs on the M2M Market Flows affecting all Flowgates eligible for generator redispatch. Therefore, the Dover PARs, like other PARs located on NYISO interties, must be identified in the JOA and modeled in the Market Flow calculation to support an effective M2M coordination process.

## **II. Description and Justification of Proposed OATT Revisions**

The NYISO and PJM propose the following amendments to their JOA. All amendments are contained in Section 5.6 of Schedule D of the JOA. PJM’s certificate of concurrence with the proposed changes is included as Attachment III to this filing.

### **Section 5.6 of Schedule D (Section 35.23) of the JOA**

Section 5.6 describes how the RTOs will determine the generation-to-load flows and interchange schedules, in MWs, that each PAR is impacting. The current Section 5.6 includes Table 4, which lists all existing Common PARs and Non-Common PARs. The RTOs propose to add two items to the list of Non-Common PARs in order for the Dover PARs to be accounted for in the list and in the Market Flow calculation. The two new lines in the table identify the Dover

PARs as “DOVER T398-A” and “DOVER T398-B.” These PARs will be defined as Non-Common PARs and treated in the Market Flow calculation consistent with the other Non-Common PARs that are the responsibility of the NYISO.

### **III. Stakeholder Approval**

The NYISO’s Management Committee unanimously approved the proposed revisions to the JOA on June 30, 2025. The NYISO Board of Directors approved the proposed tariff revisions on July 15, 2025.

PJM’s stakeholder engagement included informational updates during the May 8, 2025 and September 11, 2025 Operating Committee meetings.

### **IV. Effective Date**

The RTOs respectfully request that the Commission permit the proposed JOA revisions to become effective on November 19, 2025 (*i.e.*, the business day following the end of the statutory 60-day notice period).

### **V. List of Documents Submitted**

The NYISO submits the following documents with this filing letter:

1. A clean version of the RTOs’ proposed revisions to their JOA, which is on file with the Commission as Attachment CC to the NYISO’s OATT (Attachment I);
2. A blacklined version of the RTOs’ proposed revisions to their JOA, which is on file with the Commission as Attachment CC to the NYISO’s OATT (Attachment II); and
3. PJM’s concurrence letter, concurring with the proposed revisions to the JOA (Attachment III).

### **VI. Service**

#### **A. NYISO Service**

The NYISO will send an electronic link to this filing to the official representative of each of its customers, each participant on its stakeholder committees, the New York State Public Service Commission, and the New Jersey Board of Public Utilities. The NYISO will also post the complete filing on its website at [www.nyiso.com](http://www.nyiso.com).

**B. PJM Service**

PJM will serve a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically. In accordance with the Commission's regulations,<sup>4</sup> PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <https://www.pjm.com/library/filing-order> with a specific link to the newly-filed document, and will send an e-mail on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region<sup>5</sup> alerting them that this filing has been made by PJM and is available by following such link. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within 24 hours of the filing. Also, a copy of this filing will be available on the FERC's eLibrary website located at the following link: <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

**VII. Correspondence**

All communications and correspondence concerning this filing should be directed to:

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<sup>4</sup> See 18C.F.R §§ 35.2(e) and 385.2010(f)(3).

<sup>5</sup> PJM already maintains, updates and regularly uses e-mail lists for all PJM Members and affected state commissions.

## **VIII. Conclusion**

The RTOs respectfully request that the Commission accept the JOA revisions proposed in this filing without modification, with an effective date of November 19, 2025.

Respectfully submitted,

/s/ James H. Sweeney

James H. Sweeney, Senior Attorney  
New York Independent System Operator, Inc.

/s/ Erin Lai

Erin Lai, Senior Counsel  
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