

September 16, 2014

The Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20245

Re: *Resubmission of Proposed Tariff Amendments in Docket No. ER14-2518-000, and  
Request for a Revised Effective Date*

Dear Secretary Bose;

On July 28, 2014, the New York Independent System Operator, Inc. (“NYISO”) filed proposed tariff amendments to define certain generator outage states and associated requirements and calculations with a proposed effective date of November 1, 2014. In that filing, the NYISO also requested that the Commission issue its decision within sixty days of the filing date (*i.e.*, by September 26, 2014). The NYISO’s review of the specific and detailed implementation steps it would take in response to a Commission order accepting the July 28 filing is ongoing. However, principally due to the potential for numerous and overlapping changes to its operating and procedural manuals (“Manuals”), and the iterative nature of proposing those revisions to its stakeholders, the NYISO has concluded that it will need more time than it originally anticipated to present Manual revisions to its stakeholders before its proposed tariff revisions in this docket become effective.

Therefore, the NYISO requests to amend its proposed November 1, 2014 effective date in this docket to February 1, 2015. The NYISO also requests that the Commission issue its decision in this proceeding within sixty days of this filing or by November 16, 2014.<sup>1</sup> The NYISO is authorized to state that the two parties that protested the NYISO’s July 28, 2014 filing do not object to the extension of the effective date to February 1, 2015.<sup>2</sup>

Accordingly, the NYISO respectfully resubmits the pending tariff record from its July 28, 2014 filing in Docket No. ER14-2518 with the same text as was submitted on July 28, 2014, but with an amended effective date of February 1, 2015.<sup>3</sup> The NYISO understands that the Commission will consider this supplemental filing as an amendment to the pending Section 205

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<sup>1</sup> The Commission should not view the request for a February 1, 2015 effective date as a waiver of the NYISO’s right to change rates after sixty days’ notice to the Commission and the public. 16 U.S.C. §824d(d).

<sup>2</sup> Independent Power Producers of New York, Inc. and Astoria Generating Company, L.P. submitted separate Comments and Protests to the NYISO’s July 28, 2014 filing.

<sup>3</sup> As Attachment I Parts A and B to this filing letter, the NYISO is submitting a clean version of the tariff amendments first submitted on July 28, 2014.

tariff record that re-sets the statutory clock for Commission action on the proposed tariff revisions for sixty days from today (*i.e.*, until November 16, 2014).

This filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com). In addition, the NYISO will e-mail an electronic link to this filing to the official representative of each party to this proceeding, to each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities.

Please feel free to contact me if your office has any additional questions.

Respectfully submitted,

/s/ Mollie Lampi

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