

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

New York Independent System Operator, Inc.)

Docket No. ER14-2518-000

**REQUEST FOR EXTENSION OF TIME TO ANSWER OF
THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

Pursuant to Rules 101(e), 212, and 2008(a) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ the New York Independent System Operator, Inc. (“NYISO”) respectfully submits this motion seeking, to the extent the Commission deems necessary, an extension of time to answer the filings submitted in response to the NYISO’s July 28 filing in this proceeding (“July 28 Filing”).² The NYISO respectfully requests that the Commission allow ten (10) additional days for answers in response to the September 2 filings, providing for a due date of Monday, September 29.³ The NYISO is authorized to state that the parties whose filings it seeks to answer, *i.e.*, the Independent Power Producers of New York, Inc. (“IPPNY”) and Astoria Generating Company, L.P., do not object to this request for an extension.

I. BACKGROUND

In the July 28 Filing, the NYISO submitted proposed amendments to its Open Access

¹ 18 C.F.R. §§ 385.101(2), 385.212, and 385.2008(a) (2014).

² *New York Independent System Operator, Inc.*, Proposed Tariff Amendments to Define Certain Outage States and Associated Requirements, Docket No. ER14-2518-000 (July 28, 2014).

³ The ten day period would actually end on Saturday, September 27, so the NYISO proposes to submit its answer on the following Monday. To the extent the Commission deems that the fifteen day answer period under Rule 213(d) is not applicable to the NYISO’s planned answer, the NYISO is taking this opportunity to advise the Commission that it intends to respond to the comments and protests received in this docket by September 29, 2014.

Transmission Tariff and Market Administration and Control Area Services Tariff to define certain generator outage states and associated requirements and calculations.

On August 7, 2014, the Commission granted the motion filed by IPPNY for a fifteen-day extension of the comment due date in response to the July 28 Filing, from August 18, 2014 to September 2, 2014. As IPPNY pointed out in its motion for this extension, the NYISO did not object to the extension of time requested by IPPNY.

On September 2, 2014, two parties submitted Comments and Protests to the July 28 Filing: (1) IPPNY, and (2) Astoria Generating Company, L.P. (the “September 2 Comments and Protests”).

II. MOTION FOR EXTENSION OF TIME FOR ANSWER

To the extent that the Commission determines that Rule 213(d) of its Rules of Practice and Procedures establishes a fifteen (15) day period for answering the September 2 Comments,⁴ the NYISO respectfully requests that the Commission allow a ten (10) day extension so that answers would be accepted until Monday, September 29. In accordance with Rules 2008(a) and 101(e), good cause exists for the Commission to allow an extension of the answer period.⁵

The September 2 Comments and Protests raise a number of complex issues. Allowing additional time for the submission of an answer will provide the relevant personnel involved in the development of the NYISO’s July 28 Filing the time required to undertake a comprehensive review of the assertions and provide thorough, responsive comments. This will improve the

⁴ 18 C.F.R. § 385.213(d)(1).

⁵ 18 C.F.R. § 385.2008(a) (providing that “the time by which any person is required or allowed to act under any statute, rule, or order may be extended by the decisional authority for good cause, upon a motion made before the expiration of the period prescribed or previously extended”); 18 C.F.R. § 385.101(e) (providing that “the Commission may, for good cause, waive any provision of this part or prescribe any alternative procedures that it determines to be appropriate”).

quality of information before the Commission as it rules on the July 28 Filing.

In addition, granting the requested ten (10) day extension of time to file comments will not harm any party or delay this proceeding. As noted above, neither of the parties that filed the September 2 Comments and Protests object to this request. Moreover, the NYISO is making a separate filing today to resubmit the tariff record initially submitted July 28, 2014 and request a revised effective date for it of February 1, 2015. The NYISO understands that filing a pending tariff record will be treated by the Commission as an amendment and defer the Commission's statutory obligation to act on the proposed tariff revisions for sixty days from today, *i.e.*, until November 16, 2014.

As further explained in that filing, the revised effective date and extension will allow sufficient time for the NYISO to work through its stakeholder process to revise its operating and procedural manuals in accordance with the July 28 Filing's proposals. It would also provide the Commission with additional time within which to rule on the NYISO's July 28 Filing.

III. CONCLUSION

For the reasons set forth above, and to the extent the Commission deems necessary, the NYISO respectfully requests that the Commission allow ten (10) additional days, providing for a due date of Monday, September 29, for the NYISO to answer the filings submitted in response to the July 28 Filing.

Respectfully submitted,

/s/Mollie Lampi

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September 16, 2014

cc: Michael A. Bardee
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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 16th day of September, 2014.

/s/ Mohsana Akter

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