

February 12, 2015

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

Re: *Response to Deficiency Letter, Request for a Revised Effective Date, and
Resubmission of Proposed Tariff Amendments in Docket Nos. ER14-2518-000
and ER14-2518-001*

The New York Independent System Operator, Inc. (“NYISO”) submits this response to the Federal Energy Regulatory Commission’s (the “Commission’s”) deficiency letter issued in this proceeding on January 29, 2015 (“Deficiency Letter”).¹ The Deficiency Letter directs the NYISO to provide additional information regarding its proposed tariff amendments to define certain generator outage states submitted on July 28, 2014 (“Outage States Filing”) and its September 29, 2014 answer to protests filed in this proceeding (“NYISO Answer”). The NYISO submits the requested information in Attachment I to this filing letter.

In addition, the NYISO requests that the tariff amendments proposed in the Outage States Filing become effective on May 1, 2015.² The NYISO understands that this response to the Deficiency Letter constitutes an amendment to the Outage States Filing and a new filing date will be established pursuant to *Duke Power Co.*, 57 FERC ¶ 61,215 (1991). The previously proposed effective date of February 1, 2015 has passed. The first month following the new sixty day notice period begins May 1. A May 1, 2015 effective date will promote market certainty by allowing time for the Commission to issue an order in this proceeding prior to the proposed tariff amendments becoming effective. An effective date that is the first day of a month is also administratively desirable given the function of the proposed tariff changes.

Accordingly, the NYISO respectfully submits the pending tariff amendments from its Outage States Filing in Docket No. ER14-2518-000 with the same text, but with an amended effective date of May 1, 2015.³

¹ Capitalized terms not otherwise defined herein shall have the meaning specified in Section 1 of the OATT and Section 2 of the Services Tariff.

² The Commission should not view the request for a May 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).

³ As Attachment II 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.

This filing will be posted on the NYISO's website at 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/ Karen G. Gach

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