

March 16, 2007

By Hand

Ms. Philis Posey, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Amendment to Proposed Tariff Revision Enabling Implementation of
Neptune Scheduled Line and Request for Expedited Effective Date of the
New York Independent System Operator, Inc.; Docket No. ER07-570-
000**

Dear Secretary Posey:

Pursuant to Section 205 of the Federal Power Act, the New York Independent System Operator, Inc. ("NYISO") hereby submits a minor amendment/addition to the proposed revisions to Attachment F to its Open Access Transmission Tariff ("OATT") that the NYISO submitted on February 23, 2007 in the above-captioned docket to implement the Neptune Scheduled Line.¹ The Neptune Scheduled Line will represent a new interconnection between the New York Control Area ("NYCA") and the PJM Interconnection ("PJM") Control Area.²

The proposed Tariff revision set forth in Attachments I and II hereto corrects a minor omission from the previously filed proposed amendments to Sheet Nos. 373B through 373B.01 of Attachment F to the NYISO's OATT. In the relevant Section of the OATT, the NYISO proposes to modify an existing Tariff provision that permits the NYISO to share certain Confidential Information with ISO New England (once a series of preconditions have been met) in order to monitor for gaming and/or the possible exercise of market power by one or more Market Participants, to permit the NYISO to share similar Confidential Information with PJM. In its filing the NYISO attempted to modify each section to apply both to ISO New England and to PJM. However, in sub-section (f) on sheet No. 373B.01 of the filing the NYISO failed to

¹ The filing that the NYISO submitted on February 23, 2007 included Tariff revisions to implement both the Neptune Scheduled Line and the Dennison Scheduled Line. However, the amendment to the Tariff language submitted on February 23 that is requested in this filing is only relevant to implementing the Neptune Scheduled Line.

² Capitalized terms not specifically defined herein shall have the meaning set forth in the NYISO's Tariffs, as amended by the proposed revisions to the Tariffs that the NYISO filed in the above-captioned docket on February 23, 2007.

include language specifying that the language will apply to PJM, as well as ISO New England. The language that the NYISO submitted on February 23rd reads as follows:

- (f) ISO-NE shall return or destroy Confidential Information received from the ISO when the issue underlying ISO-NE's or PJM's inquiry has been resolved.

The NYISO is now proposing to amend the relevant language to read as follows:

- (f) ISO-NE or PJM (as appropriate) shall return or destroy Confidential Information received from the ISO when the issue underlying ISO-NE's or PJM's inquiry has been resolved.

The NYISO thanks the Commission Staff for bringing the omission identified above to its attention and providing the NYISO an opportunity to correct this omission.

I. Documents Submitted

The NYISO submits the following documents:

1. This filing letter;
2. Clean versions of the revised OATT Attachment F Tariff sheets (Attachment I); and
3. Blacklined versions of the revised OATT Attachment F Tariff sheets (Attachment II).

II. Requested Effective Date

The NYISO respectfully requests expedited consideration of this amendment to the NYISO's February 23, 2007 filing and waiver of the notice requirements of 18 C.F.R. § 35.3(a) that rate schedules be filed not less than sixty days prior to the commencement of service, to the extent necessary to permit this filing to take effect on April 25, 2007 (the effective date requested in the NYISO's February 23, 2007 filing in the above-captioned docket). A waiver of the notice requirements is appropriate in this instance because the correction being proposed herein is minor in scope and does not impact the Commission's (or any interested entity's) ability to timely review the substance of the NYISO's February 23, 2007 filing.

III. Service

The NYISO will electronically send a link to this filing to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the electric utility regulatory agencies of New Jersey and Pennsylvania. In addition, the complete filing will be posted on the NYISO's website at www.nyiso.com. The NYISO will also make a paper copy available to any interested party that requests one. To the extent necessary, the NYISO requests waiver of the requirements of Section 35.2(d) of the Commission's Regulations (18 C.F.R. § 35.2(d) (2006)) to permit it to provide service in this manner.

IV. Conclusion

WHEREFORE, for the foregoing reasons, the NYISO respectfully requests that the Commission accept for filing the proposed Tariff modifications that are attached hereto and grant the waivers requested herein, including NYISO's request to permit the Tariff revision proposed herein to become effective on April 25, 2007.

Respectfully submitted,

Alex M. Schnell
New York Independent System Operator, Inc.

cc: Shelton M. Cannon
Larry Gasteiger
Connie Caldwell
Michael A. Bardee
Kathleen E. Nieman
Dean Wight
Lance N. Hinrichs

Attachment I

Clean Versions of the Revised OATT Attachment F Sheets

or parties that are the source or subject of the Confidential Information and, in conjunction with ISO-NE or PJM, shall undertake reasonable efforts to ensure that the source(s) or subject(s) of the information are provided an opportunity to participate in defending the information from disclosure;

- (d) if required to release Confidential Information to a court or regulatory body, ISO-NE or PJM (as appropriate) shall take measures to ensure that it receives notice of any requests from third parties for access to such data and shall notice the ISO of any such requests. Upon receipt of notice from ISO-NE or PJM, the ISO shall inform the party or parties that are the source or subject of the Confidential Information and, in conjunction with ISO-NE or PJM, shall undertake reasonable efforts to ensure that the source(s) or subject(s) of the information are provided an opportunity to participate in defending the information from disclosure;
- (e) if required to release Confidential Information to a court or regulatory body, ISO-NE or PJM (as appropriate) shall seek appropriate protective relief to limit the disclosure to the greatest extent possible; and
- (f) ISO-NE or PJM (as appropriate) shall return or destroy Confidential Information received from the ISO when the issue underlying ISO-NE's or PJM's inquiry has been resolved.

4A.0 INSIDER TRADING

This Section defines insider trading, explain the duties of ISO Employees and describes behavior that is prohibited under securities laws.

4A.1 Insider Information:

Federal laws prohibit the purchase or sale of any publicly traded security by a person in possession of important information about the security or its issuer that is not publicly known.

These laws have special significance to the ISO because ISO Employees routinely learn of Confidential Information about Market Participants and others. This circumstance creates two

Issued by: Mark S. Lynch, President
Issued on: March 15, 2007

Effective: April 25, 2007

Filed to comply with order of the Federal Energy Regulatory Commission, Docket No. ER05-727-000, issued May 24, 2005, 111 FERC ¶ 61,238 (2005).

Attachment II

Blacklined Versions of the Revised OATT Attachment F Sheets

or parties that are the source or subject of the Confidential Information and, in conjunction with ISO-NE or PJM, shall undertake reasonable efforts to ensure that the source(s) or subject(s) of the information are provided an opportunity to participate in defending the information from disclosure;

- (d) if required to release Confidential Information to a court or regulatory body, ISO-NE or PJM (as appropriate) shall take measures to ensure that it receives notice of any requests from third parties for access to such data and shall notice the ISO of any such requests. Upon receipt of notice from ISO-NE or PJM, the ISO shall inform the party or parties that are the source or subject of the Confidential Information and, in conjunction with ISO-NE or PJM, shall undertake reasonable efforts to ensure that the source(s) or subject(s) of the information are provided an opportunity to participate in defending the information from disclosure;
- (e) if required to release Confidential Information to a court or regulatory body, ISO-NE or PJM (as appropriate) shall seek appropriate protective relief to limit the disclosure to the greatest extent possible; and
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing transmittal letter upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 16th day of March, 2007.

Michael E. Haddad
[ADD ADDRESS]