UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Morgan Stanley Capital Group, Inc.	)	
Complainant	)	
	)	
v.	)	**Docket No. EL00-103-000**
	)	
New York Independent System	)	
Operator, Inc.	)	
Respondent	)	

NEW YORK INDEPENDENT SYSTEM OPERATOR INC.'S MOTION FOR LEAVE TO SUBMIT ANSWER ONE DAY OUT OF TIME AND ANSWER TO COMPLAINT AND REQUEST FOR FAST-TRACK PROCESSING OF MORGAN STANLEY CAPITAL GROUP

Pursuant to Rules 206(f) and 213 of the Commission's Rules of Practice and Procedure,[1] and consistent with the Commission's *Notice* issued on August 24, 2000, the New York Independent System Operator, Inc. ("NYISO") hereby submits a motion for leave to answer one day out of time, and answers the complaint filed by Morgan Stanley Capital Group, Inc. ("MSCG") in this proceeding on August 23, 2000 ("Complaint").

As an initial matter, the Complaint should be rejected in its entirety because it was inappropriately filed under the Commission's "Fast-Track" processing procedures. Moreover, the Complaint should be rejected because the NYISO's Open-Access Transmission Tariff ("ISO OATT") authorizes the NYISO to issue long-term Transmission Congestion Contracts ("TCCs") and because an overwhelming majority of the Business Issues Committee ("BIC") directed the NYISO to offer long-term TCCs. MSCG failed to participate in the committee decision-making process and has ignored the NYISO's established appeals procedures. It should not be allowed to unilaterally usurp a consensus reached by other participants in the NYISO-administered markets. In addition, the Complaint should be rejected because it does not adequately explain how transitional flaws, temporary uncertainty and remedial actions undertaken in the NYISO-administered markets, which the Commission has already indicated have had little effect on the valuation of TCCs, will hinder MSCG's ability to make efficient TCC purchasing decisions. Finally, for the reasons set forth below, the sale of long-term TCCs will not result in the injuries alleged by MSCG.

Contrary to MSCG's insinuations, the NYISO-administered TCC auctions have worked well. TCCs sold in prior auctions have been properly priced by the market, which should be counted on to account for any possible regulatory or market design risk. There have been no previous allegations that market flaws have affected prior TCC auctions. Indeed, the NYISO-administered monthly Reconfiguration Auctions offer market participants the opportunity to adjust their portfolios of TCCs in every month during the life of any TCC, thereby alleviating the risks that MSCG associates with long-term TCCs.

[1] 18 C.F.R. §§ 385.206(f) and 213 (2000).

I. Communications

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II. Motion for Leave to Answer One Day Out of Time

The NYISO respectfully requests permission to submit its answer to the Complaint one day out of time on account of the demands placed on NYISO legal staff and outside counsel working to prepare the NYISO's September 1 combined compliance filing and report in Docket Nos. ER00-1969-000, EL00-57-000, EL00-60-000, EL00-63-000, EL00-64-000, EL00-67-000, ER00-2624-000, ER00-3038, EL00-70-000, EL00-70-001 and EL00-82-000, and scheduling problems related

[2] The ISO respectfully requests waiver of 18 C.F.R. § 385.203(b)(3) to permit service on counsel for the ISO in both Washington, D.C. and Richmond, VA.

to the Labor Day holiday. The NYISO does not believe that this one-day delay will adversely affect the interests of any participant in this proceeding.

III. Answer

In its Complaint, MSCG demands that the Commission order the NYISO to postpone the current auction for two and five year TCCs. The Complaint is without merit and should be rejected by the Commission for a number of reasons. First, the initial round of the current TCC auction has already begun and will soon be complete.[3] MSCG has not offered any persuasive reason for overturning it, especially given the economic dislocations that undoing the first round of the auction would create. Second, MSCG has misused the Commission's "Fast-Track" complaint procedures. Third, the NYISO is authorized by the Commission, through the Commission-approved Tariff, to offer long-term TCCs in the current auction. Fourth, the sale of long-term TCCs has been supported by an overwhelming majority of the NYISO's stakeholders acting pursuant to the NYISO's Commission approved governance procedures. Fifth, MSCG has failed to avail itself of the NYISO's established governance and appeal procedures which would have permitted it to more appropriately voice its concerns about the sale of long-term TCCs. Sixth, MSCG has failed to establish that it or any other market participant will suffer harm as a result of the sale of long-term TCCs in the current auction, especially since neither MSCG nor any other market participant is required to purchase long-term TCCs in any auction. Seventh, there is no basis for MSCG's argument that the sale of long-term TCCs will somehow "perpetuate" supposed flaws in other NYISO-administered markets. Eighth, MSCG's

[3] The initial round of the current TCC auction will conclude on September 7. The entire TCC auction will conclude by November 1.

inability to participate in the Real-Time Market for energy is irrelevant to the question of whether long-term TCCs should be offered in the current auction. Ninth and finally, the Complaint includes at least two other misleading assertions which should not be permitted to affect the Commission's decision in this proceeding. Because MSCG's complaint is fundamentally flawed in these respects, it should be rejected by the Commission.

A. <u>The Complaint Should Be Rejected Because MSCG Has Misused the Commission's Fast-Track Processing Procedures</u>

As an initial matter, the Complaint should be rejected because MSCG has misused the Commission's "Fast-Track" processing procedures. The Commission has previously made it clear that:

> Fast Track processing will be employed in only limited circumstances because of the extraordinarily compressed time schedule that would place a heavy burden on all parties to the proceeding. The Commission strongly encourages potential Complainants to seek Fast Track processing sparingly and only in the most unusual cases that demand such accelerated treatment. A misuse of Fast Track processing could ultimately tax the Commission's limited resources and jeopardize the availability of the Fast Track procedures. Any continuing pattern of misuse by a particular party would also ultimately undermine that party's credibility when future requests for Fast Track processing are requested.[4]

In this proceeding, MSCG waited until near the close of business on August 23, more than a month from the time that the BIC endorsed the issuance of long-term TCCs, *i.e.*, July 20, to file a "fast-track" complaint seeking "emergency" relief from the supposedly irreparable harm it would suffer if the long-term TCCs were auctioned at the NYISO's scheduled September 1 auction. MSCG has offered no explanation whatsoever of the reasons for this delay and has completely ignored the grossly unfair

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[4] *See Amoco Energy Trading Corp., et. al., v. El Paso Natural Gas Co. ("Amoco")*, 89 FERC ¶ 61,165 at 61,498-99 (1999) (granting complaint but rejecting complainant's request for fast-track processing); *citing Complaint Procedures*, *Order No 602,* FERC Stats. & Regs. ¶ 31,071 (1999); *order on reh'g*, *Order No. 602-A*, FERC Stats. & Regs. ¶ 31,076 (1999).

procedural burden that would have been placed on the NYISO had it been required to reply to the Complaint prior to September 1. The NYISO respectfully submits that because MSCG waited so long to file its Complaint, the procedural "emergency" here is of MSCG's own making and does not provide an adequate basis for the use of Fast-Track procedures. It is also inappropriate for MSCG to claim that Fast-Track relief is required by "market participants generally"[5] when nearly 90% of market participants support the sale of long-term TCCs. The Commission should not allow MSCG to misuse the Fast Track procedures in this manner and should reject the Complaint on this basis alone.[6]

B. The NYISO Tariff Authorizes the NYISO to Auction Long-Term TCCs

The NYISO is clearly authorized to offer long-term TCCs in the current auction. The ISO OATT, as approved by the Commission, authorizes the NYISO to sell TCCs with durations ranging from six months to five years.[7] *See* ISO OATT, Attachment M, § 8.4. The ISO OATT provides that TCCs with durations of six months to one year shall be available in the Initial Auction and that "TCCs with durations of 2 years, 3 years, 4 years, or 5 years may also be available in this auction." ISO

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[5] *See* Complaint at 11.

[6] The NYISO respectfully advises the Commission that MSCG previously filed a Fast-Track complaint against the NYISO in Docket No. EL00-90-000 which, like the current Complaint, sought to unilaterally override a consensus decision reached by the NYISO's independent governance structure after MSCG failed to participate in the relevant committee meetings. It should be noted that MSCG's earlier complaint called for the Commission to make sweeping and complex changes to the admonition that complaints raising "complex issues" that "are likely to take some time to resolve" should not be fast-tracked. 89 FERC at 61,498. MSCG has also filed a Fast-Track complaint against the California ISO in Docket No. EL00-91-000 which was rejected by the Commission. *Morgan Stanley Capital Group, Inc. v. California Independent System Operator*, 92 FERC ¶ 61,112 (2000).

[7] *See Central Hudson Gas & Electric Corp., et. al.,* 86 FERC ¶ 61,062 (1999);
(continued . . .)

The ISO OATT also describes the process by which the NYISO shall determine the duration of TCCs offered in the Initial Auction, stating that "the ISO will conduct a polling process to asses the market demand for TCCs with different durations, which it will take into consideration when making this determination." ISO OATT, Attachment M, § 8.4. The NYISO employed such a "polling process," as described in greater detail below, and received overwhelming support from market participants for the plan to auction long-term TCCs at this time.

The Commission has already considered and approved the mechanism, contained in the ISO OATT, by which long-term TCCs may be offered by the NYISO. The NYISO has used this process and, with the input and support of market participants, reached a determination that long-term TCCs should be offered in the current action. MSCG now seeks to circumvent this process, after failing to participate in it, and provides no explanation for why the Commission should ignore such broad stakeholder support for the sale of long-term TCCs. MSCG's Complaint should accordingly be rejected by the Commission.

C. <u>The Business Issues Committee Approved the Sale of Long-Term TCCs</u>

The plan to offer TCCs of a five year duration has been endorsed by a resounding majority of NYISO stakeholders through the Commission approved governance process. In reaching the determination to offer long-term TCCs in the current auction, the NYISO polled market participants and deferred to the consensus opinion in favor of selling two-year and five-year TCCs at this time.

At several of its meetings, the Market Structure Working Group ("MSWG") specifically considered the issue of whether to issue long-term TCCs and concluded that long-term TCCs should be

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order on reh'g, 88 FERC ¶ 61,138 (1999).

made available to market participants in the current TCC auction. Based on its review of the issue, the MSWG submitted a motion to the BIC recommending that two and five year TCCs be sold.

The BIC voted on the motion to increase the duration of certain TCCs to five years at its July 20, 2000, meeting, and, as is clear from the Complaint itself, 87.70% of the votes cast supported the motion.[8] Based on the recommendation of the BIC and the NYISO's independent assessment of the TCC market, the NYISO made the determination to offer two and five year TCCs in the current auction.

The MSWG's and BIC's actions clearly indicate widespread stakeholder support for the sale of long-term TCCs, despite the existence of certain transitional flaws in the NYISO-administered markets.[9] Evidently, more than 87% of the NYISO's market participants did not believe that transitional flaws in the NYISO-administered markets should prevent the auction of long-term TCCs. By its complaint, MSCG seeks to subvert the NYISO's governance process and unilaterally impose its own preferences concerning the sale of long-term TCCs on the vast majority of market participants. The Commission should follow its precedent and not permit a

[8] *See* Complaint, Exhibit A.

[9] As is noted below in Section E, MSCG has not demonstrated that these flaws will affect the valuation of long-term TCCs or otherwise result in economic harm to MSCG.

single aggrieved market participant to overturn a decision made by an ISO's Commission-approved governance mechanisms.[10]

D. MSCG Failed to Participate in the NYISO's Established Governance Process and Has Not Availed Itself of the NYISO's Dispute Resolution or Appeal Procedures

MSCG failed to participate in the July 20, 2000, meeting of the BIC at which the issue of long-term TCCs was presented for a vote. As a market participant served by the NYISO since June 2000**,** MSCG was notified of the agenda for this meeting and was entitled to participate, by phone if necessary, in the debates and voting that took place there. Nevertheless, MSCG did not attend this meeting and, in fact, has only attended 2 out of 12 meetings of the principal governance committees since becoming a voting member in June 2000. As a consequence of failing to attend the July 20 meeting, MSCG missed its best opportunity to present its views about issues being considered by the BIC, including the decision to offer long-term TCCs in the current auction.

Furthermore, MSCG failed to employ the appeals process, established expressly for the purpose of allowing challenges to actions of the BIC, as provided in the By-Laws of the BIC. Article

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[10] *See, e.g., New York Independent System Operator, Inc.*, 90 FERC ¶ 61,319 (2000) (rejecting alternative ICAP recall bid proposal that a single party attempted to propose even though another system had been endorsed by the NYISO Committees). *See also USGen New England, Inc.*, 90 FERC ¶ 61,323 (2000) (rejecting unilateral contract for system restoration services); *New England Power Pool*, 90 FERC ¶ 61,168 (2000) (expressing preference for consensus CMS/MSS proposal in New England); *Sithe New England Holdings, LLC and Sithe New Boston, LLC v New England Power Pool, and ISO New England, Inc.*, 86 FERC ¶ 61,283 (1999), *reh'g denied,* 88 FERC ¶ 61,080 (1999) (rejecting a market participant's attempted unilateral revision of a complex arrangement developed by an ISO); *PJM Interconnection, L.L.C.*, 84 FERC ¶ 61,212 at 62,035 (1998) ("[W]e emphasize that in accepting PJM's proposed revisions . . . we deferred to the judgment of the PJM ISO and its Board concerning a regional solution to an identified regional problem based on what we understand is a broad, if not unanimous, consensus.")

XIII of the BIC By-Laws provides that any member of BIC may appeal an action of the BIC by filing a written notice of appeal within ten business days from the provision of notice of the action at issue. Article XIII further provides that a party may request a stay of any action pending appeal to the Management Committee. MSCG did not use either of these established procedures.[11]

MSCG now approaches the Commission seeking extraordinary relief despite the fact that it failed to participate in the NYISO's ordinary governance and appeals processes. MSCG should not be permitted to unilaterally usurp a decision made by a super-majority of its peers and thereby undermine the NYISO's governance mechanisms when it has utterly failed to exercise its participatory rights.

E. **MSCG Has Failed to Prove That It Will Suffer Any Harm if the Sale of Long-Term TCCs Proceeds**

MSCG has failed to prove that it will suffer any harm if long-term TCCs are auctioned. MSCG alleges that it will be placed in the unfair position of having to "analyze and purchase TCCs in a flawed, uncertain and unstable marketplace." It further alleges that TCC prices are inaccurate and artificial because of "the market flaws, uncertainty and regulatory risk involved." MSCG believes that the auction of long-term TCCs should be postponed because two and five year TCC contracts will purportedly "perpetuate the effects" of the current, transitional market flaws.

MSCG's Complaint does not describe any identifiable harm related to the sale of long-term TCCs. Instead, the Complaint simply reflects MSCG's general dissatisfaction with the NYISO-administered markets and fails to show a logical nexus between the sale of long-term TCCs and any

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[11] It should be noted that when the Management Committee voted to approve temporary energy bid caps, which raised much more far-ranging and complex issues than those involved in this proceeding, the NYISO's appeals process was resolved in less than a month.

harm that might be suffered by MSCG. As such, the Complaint does not identify any specific harm that could be avoided by undoing the first round of the current TCC auction and preventing the sale of long-term TCCs in future rounds. Similarly, the Complaint fails to identify specific market flaws that necessitate the relief MSCG seeks. Instead, MSCG relies on exaggerations of the extent of uncertainty in the NYISO-administered markets and misleading suggestions that existing flaws will require the NYISO to substantially overhaul its market design. The NYISO does not believe that a radical overhaul is needed to address the transitional market flaws, many of which already are, or will soon be, remedied.[12] Certainly, the NYISO does not believe any remedial action which it may be required to take in the future will be as dramatic as its imposition of temporary energy bid caps, which the Commission previously found did not have a "significant impact on what parties paid for . . . .[TCCs]."[13]

MSCG argues that market participants are placed in the unfair position of having to analyze and purchase TCCs in an uncertain market. Even assuming that market conditions are as uncertain as MSCG asserts, market participants would not be disadvantaged by the sale of long-term TCCs since the market clearing prices would reflect any perceived market uncertainty or instability. Secondly, uncertain market conditions will not disadvantage MSCG vis-a-vis other market participants, since any uncertainty affecting the market for long-term TCCs would be equally applicable to all market participants.

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[12] *See New York Independent System Operator, Inc.'s Combined Compliance Filing and Report* in Docket Nos. ER00-1969-000, EL00-57-000, EL00-60-000, EL00-63-000, EL00-64-000, EL00-67-000, ER00-2624-000, ER00-3038, EL00-70-000, EL00-70-001 and EL00-82-000 (September 1, 2000).

[13] *See New York Independent System Operator, Inc., et. al.,* 92 FERC ¶ 61,073, *slip op.* at 17 (2000).

Most importantly, neither MSCG nor any other market participant is required to participate in the auction of long-term TCCs. If MSCG feels it cannot determine the value or risk of long-term TCCs to its satisfaction, then it should not purchase them. MSCG can completely avoid any perceived risk posed by long-term TCCs in this manner.[14] MSCG, however, seeks to go significantly further and prevent *any* market participants from purchasing long-term TCCs, despite the fact that nearly 90% of market participants supported the sale of such TCCs.

F. <u>The Sale of Long Term TCCs Will Not Perpetuate Current Market Flaws</u>

MSCG argues that offering long-term TCCs is unreasonable at this time because long-term TCCs will perpetuate the effects of transitional market flaws. MSCG's implicit assumption that the mere existence of long-term TCCs will somehow perpetuate unrelated market flaws, is completely unsupported and incorrect. First, long-term TCCs would not have the effect of perpetuating the alleged market designs cited by MSCG because TCCs have little or no impact on them. Second, long-term TCCs would not have the effect of perpetuating market design flaws for the life of the TCCs because market participants may continue to buy and sell TCCs in the monthly Reconfiguration Auctions administered by the NYISO throughout the life of the TCCs. Further, secondary market trading offers yet another mechanism to support the continued liquidity of the TCC market.[15] The existence of monthly Reconfiguration Auctions and secondary market trading guarantees that the market for TCCs

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[14] It should be noted that MSCG is a non-physical market participant which does not have any service obligations in the New York Control Area and therefore does not face legal requirements that necessitate its acquisition of long-term TCCs. MSCG's participation in the TCC auction is thus entirely voluntary.

[15] *See, generally*, 86 FERC 61,062 at 61,229 (stating that the Commission expects secondary market transactions to take many different forms after an auction is complete.)

will remain liquid and responsive to changes in other NYISO-administered markets throughout the life of each TCC.

G. MSCG's Ineligibility to Participate in the Real-Time Market for Energy is Irrelevant to MSCG's Present Complaint

MSCG argues that it faces an asymmetrical, unstable market because it cannot participate in the Real-Time Market. It further argues, without any supporting explanation, that because MSCG lacks access to the Real-Time Market for energy, MSCG will not be able to mitigate the risks associated with long-term TCCs.

Whether MSCG has access to both the Day Ahead and the Real Time energy markets is irrelevant for purposes of its Complaint regarding long-term TCCs. First, TCCs are not sold in the Real-Time Market, so ownership of TCCs has no impact in the Real-Time Market for energy. Second, even if TCC ownership did have an effect on the Real-Time Market for energy, that effect would be the same for short-term and long-term TCCs. MSCG has failed to show any reason why long-term TCCs are fundamentally different than short-term TCCs in terms of their impact on other NYISO-administered markets. Ultimately, it appears that the Complaint is the product of MSCG's dissatisfaction with its current inability, as a non-physical market participant, to directly participate in the Real-Time Market for energy. In an effort to focus attention on that issue, it now asserts that is cannot participate on an even footing in the market for long-term TCCs because of its lack of access to the Real-Time Market for energy. This argument is without merit.

H. Other Misleading Assertions

Finally, the NYISO must correct two misleading assertions that were included in the Complaint. First, there is no basis for MSCG's claim that the NYISO lacks the "manpower and resources" to successfully conduct long-term TCC auctions. Having long-term TCC "products" does not add significant administrative complexity to the auction process and has not unduly burdened the NYISO's staff. Similarly, the NYISO's efforts to address other market flaws have not detracted from its ability to administer TCC auctions. Indeed, the NYISO recently made a filing with the Commission seeking to dispense with the use of a third party TCC auctioneer and requesting permission to perform the auctioneering function itself. The NYISO has already begun the latest round of TCC auctions without experiencing any of the manpower or resource problems that MSCG predicted.

Second, and more seriously, MSCG has distorted the significance of the NYISO's current transmission study.[16] As is clear from Exhibit A of the Complaint itself, the NYISO is simply undertaking a review of the reliability consequences associated with the expected large-scale entrance of new generation into its markets in the next five years. The results of this study will not cause the NYISO to "change its market" any more than other ISOs which are expecting a substantial amount of entry by new suppliers will overhaul their market designs because the amount of available supply increases. MSCG certainly should be taking the anticipated entry of new generation into account when they decide whether to purchase, and how much to pay for, long-term TCCs. However, the likelihood of new entry is plainly not a legitimate reason to forbid the auction of long-term TCCs.

IV. Compliance with Rule 213(c) of the Commission's Rules of Practice and Procedure

A. Disputed Factual and Material Allegations

- The NYISO denies MSCG's allegation that there is a genuine emergency which justifies MSCG's

-Track" complaint procedures.

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[16] *See* Complaint at 7.

- The NYISO denies MSCG's allegation that TCC prices "will not be based on economically

- The NYISO denies MSCG's allegation that long-term TCCs will somehow "perpetuate" transitional market flaws.
- The NYISO denies MSCG's allegation that its current market design is "transitional" in nature, and denies that its current market design will "change dramatically when . . . acknowledged market

- The NYISO denies MSCG's allegation that the NYISO-administered markets "do not reflect economic or electrical reality."
- The NYISO denies MSCG's allegation that the fact that it is conducting a long-term transmission study signal that it is "uncertain about the economic and electrical aspects of its own transmission system . . . ."
- The NYISO denies MSCG's allegation that it is unreasonable for it to auction long-term TCCs in the current market environment.
- The NYISO denies MSCG's allegation that non-physical market participants have no ability to mitigate their risks.

- The NYISO denies MSCG's allegation that the sale of long-term TCCs will favor certain market participants over others.
- The NYISO denies MSCG's allegation that the NYISO "manifestly will have insufficient manpower to support long-term TCCs.

B. <u>Law Upon Which This Answer Relies</u>

- *Amoco Energy Trading Corp., et. al., v. El Paso Natural Gas Co.,* 89 FERC ¶ 61,165 at 61,498-99 (1999) (describing situations where "Fast-Track" processing is inappropriate.)
- *Complaint Procedures, Order No. 602,* FERC Stats. & Regs. ¶ 31,071 (1999); *order on reh'g, Order No. 602-A*, FERC Stats. & Regs. ¶ 31,076 (1999) (same.)
- *Central Hudson Gas & Electric Corp., et. al.,* 86 FERC ¶ 61,062 (1999); *order on reh'g,* 88 FERC ¶ 61,138 (1999) (approving the NYISO's TCC auction procedures.)
- *New York Independent System Operator, Inc.*, 90 FERC ¶ 61,319 (2000) (rejecting a market participant's unilateral attempt to overturn a consensus decision arrived at pursuant to an ISO's Commission-approved governance provisions.)
- *USGen New England, Inc.* 90 FERC ¶ 61,323 (2000) (rejecting unilateral contract for system restoration services.)
- *New England Power Pool,* 90 FERC ¶ 61,168 (2000) (expressing preference for consensus CMS/MSS proposal in New England.)
- *Sithe New England Holdings, LLC and Sithe New Boston, LLC v New England Power Pool, and ISO New England, Inc.,* 86 FERC ¶ 61,283 (1999), *reh'g denied,* 88 FERC ¶ 61,080 (1999) (rejecting a market participant's attempted unilateral revision of a complex arrangement developed by an ISO.)

- *PJM Interconnection, L.L.C.*, 84 FERC ¶ 61,212 (1998) (deferring to the judgment of an ISO and its market participants concerning a regional solution to an identified regional problem based on a broad consensus.)
- *See New York Independent System Operator, Inc., et. al.,* 92 FERC ¶ 61,073, *slip op.* at 17 (2000) (holding that the after-the-fact imposition of temporary energy bid caps would not upset the valuation of previously sold TCCs.)

C. Attachments

- None.

V. Conclusion

WHEREFORE, for the foregoing reasons, the New York Independent System Operator, Inc., respectfully asks that the Commission deny Morgan Stanley Capital Group, Inc. the relief requested in its complaint.

Respectfully submitted,

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September 6, 2000

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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 Commission's Rules of Practice and Procedure 18 C.F.R. § 2010 (1999).

Dated at Washington, D.C. this 6th day of September, 2000.

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