

April 15, 2009

Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Status Report of the New York Independent System Operator, Inc.  
in Docket Nos. ER03-552-011 and ER03-984-009**

Dear Secretary Bose:

In its order issued on February 22, 2006, *New York Independent System Operator, Inc.*, 114 FERC ¶ 61,198 (“February 22 Order”), the Federal Energy Regulatory Commission (“Commission”) directed the New York Independent System Operator, Inc. (“NYISO”) to file within 60 days a “timetable for implementation of the Netting Bilaterals Project (the “Project”) that includes, *inter alia*, specific dates for completion of the COO [*i.e.* Concept of Operation], and realistic dates for implementation.”<sup>1</sup> In addition, the Commission directed the NYISO to submit “quarterly status reports on its progress with the Commission, within 15 days after the end of each calendar quarter, beginning with the calendar quarter ending June 30, 2006.”<sup>2</sup>

In response to the February 22 Order, the NYISO submitted a compliance filing on April 24, 2006, and quarterly status reports on July 17, 2006, October 16, 2006, January 16, 2007, April 16, 2007, July 16, 2007, October 16, 2007, January 28, 2008, April 15, 2008, July 15, 2008, October 15, 2008 and January 15, 2009. In its order issued on October 6, 2006, *New York Independent System Operator, Inc.*, 117 FERC ¶ 61,026 (“October 6 Order”), the Commission referred the matter to the Commission’s Dispute Resolution Service “to see if the parties can reach agreement on the scope of work and on a timetable for implementation of the Project.”<sup>3</sup> The parties reached an understanding which was memorialized in the quarterly status report filed on January 16, 2007. The instant quarterly report discusses the progress made on the Project from January 2009 to the present.

The NYISO project team is continuing to progress through the implementation of the Project, on-schedule for a Q3 2009 deployment. Additionally, the NYISO drafted the necessary tariff revisions and presented those draft revisions to market participants for comment at the April 1, 2009 Market Issues Working Group meeting. The tariff revisions are scheduled to be voted on by market participants at the Business Issues Committee meeting in May 2009.

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<sup>1</sup> *New York Independent System Operator, Inc.*, 114 FERC ¶ 61,189 at P 14 (2006).

<sup>2</sup> *Id.*

<sup>3</sup> *New York Independent System Operator, Inc.*, 117 FERC ¶ 61,026 at P 16 (2006).

As reported in previous status reports for the Project, the Trading Hubs feature will primarily be supported by the following systems at NYISO:

- NYISO's Market Information System ("MIS") will support all functions involved in bilateral transaction bidding for trading hubs, including the user interfaces for submitting and retrieving trading hub bids and schedules, as well as the registration of trading hubs.
- NYISO's Credit Management System ("CMS") will support all of the credit rules required for trading hub activity. The CMS is a new system being implemented over several phases. The third phase of CMS, scheduled for September 2009, calls for integration of the CMS with NYISO's Energy Markets, including its trading hubs feature. Therefore, the implementation of trading hubs is dependent on the September 2009 deployment of the new CMS.
- NYISO's Customer Settlement Systems – Daily and monthly invoice processes will support the calculation of new settlements related to their trading hub activities.

Schedule for the Project:

- Q1/Q2 2009 – Governance approval of tariff changes for the Project
- Q2 2009 - FERC Filing of tariff changes
- Q3 2009 – NYISO CMS implementation, integrated with Energy Markets and the trading hub credit rules.
- Q3 2009 - Production implementation of the Project (deployed together with the NYISO CMS for credit handling).

Direct Energy Services, LLC, the successor company that purchased Strategic Energy, LLC, has authorized the NYISO to state that it concurs with this quarterly status report.

WHEREFORE, for the foregoing reasons, the NYISO respectfully submits this quarterly progress report as directed in the February 22 Order.

Respectfully submitted,

/s/Andrew S. Antinori  
Andrew S. Antinori  
Senior Attorney  
NEW YORK INDEPENDENT  
SYSTEM OPERATOR, INC.

cc:	Shelton Cannon	Larry Gasteiger
	Connie Caldwell	Michael Bardee
	Kathleen Nieman	Lance Hinrichs
	John Yakobitis	Rachel Spiker
	Gregory Berson	Jeffrey Honeycutt