



## **II. Background**

The NYISO is the independent body responsible for providing open access transmission service, maintaining reliability, and administering competitive wholesale markets for electricity, capacity, and ancillary services in New York State. The NYISO is subject to the NAESB business practice standards that are incorporated by reference into the Commission's regulations.<sup>2</sup>

In the NOPR, the Commission proposes to incorporate by reference an updated version of NAESB's WEQ standards into its regulations. As pertinent to these comments, the Commission proposes to adopt NAESB's revisions to Standard WEQ-001, which addresses business practices for public utilities' Open Access Same-Time Information System websites.

## **III. Comment**

The NYISO appreciates the opportunity to provide this comment on the NOPR, and respectfully requests that the Commission consider it in developing a final rule in this proceeding. The NYISO understands that PJM will submit a comment requesting that the Commission establish an effective date of January 1, 2009 or later for compliance with revised Standard WEQ-001. The NYISO also understands that PJM's comment will explain that developing and testing the necessary software modifications to comply with revised Standard WEQ-001 will be a complex effort, and that it will need sufficient time to implement these changes. The NYISO agrees with this comment, and it asks the Commission to institute an effective date of January 1, 2009 or later for compliance with revised Standard WEQ-001.

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<sup>2</sup> The NYISO has received from the Commission waivers of certain NAESB standards that are inapplicable in the NYISO's locational based marginal price market structure. See *New York Independent System Operator, Inc.*, 117 FERC ¶ 61,197 (2006); *New York Independent System Operator, Inc., Letter Order*, Docket No. ER07-369-000 (Jan. 29, 2007); *New York Independent System Operator, Inc.*, 121 FERC ¶ 61,036 (2007).

**IV. Conclusion**

WHEREFORE, for the foregoing reasons, the New York Independent System Operator, Inc. respectfully requests that the Commission consider the comment contained herein.

Respectfully submitted,

**/s/ Michael E. Haddad**

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