

II. Comments

The Notice requests that interested parties submit comments regarding the effectiveness of current transmission planning processes, the treatment of resources in those processes, the development of regional and inter-regional transmission plans and the effectiveness of, and alternatives to, existing cost allocation methods. As the EEI Motion explains, commenters must address policy issues requiring careful deliberation and consider a substantial record of oral and written comments provided at the technical conferences. The NYISO agrees with EEI that providing meaningful comments without additional time will be difficult and therefore supports the EEI Motion.

III. Conclusion

For the reasons stated above, the NYISO respectfully requests that the Commission grant EEI's motion for an extension of time to file comments and provide interested parties until November 23, 2009 and December 18, 2009 to file initial and reply comments, respectively.

Respectfully submitted,

/s/ Ted J. Murphy

Ted J. Murphy

Counsel for

New York Independent System Operator Inc.

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.

Dated at Washington, D.C. this 30th day of October, 2009

/s/ Vanessa A. Colón _____
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