



*Please note: This summary is provided for informational purposes only. It is not intended to be a substitute for the presentations and other information provided by the NYISO or the discussions that take place at the meetings*

## NYISO Consumer Interest Liaison Weekly Summary

### February 23 – February 27, 2015

#### **Notices:**

- *As a reminder, in preparation for the 2015 Sector Meetings, the NYISO requests your input on meeting topics. To help facilitate the discussion we ask that you please provide specific detailed questions along with the topic. Please send topics and questions to Debbie Eckels ([deckels@nyiso.com](mailto:deckels@nyiso.com)) no later than Friday, March 20th.*
- *We are pleased to announce that NYISO's Training Team will be offering the, in-class, MT-201 New York Market Overview Course (NYMOC) on March 23 – 27, 2015.*

#### **Meeting Summaries:**

##### **Monday, February 23, 2015**

##### **Electric System Planning Working Group**

##### **Attachment Y Cleanup for Public Policy Transmission Planning Process**

Carl Patka of the NYISO led a discussion on the NYISO Developer Agreement (Agreement) for the Public Policy Transmission Planning Process. Several stakeholders had submitted comments for consideration. Consensus was reached on many areas of the Agreement and a second day of discussion was scheduled for Friday, February 27, 2015. To see the documentation for the Agreement, please go to:

[http://www.nyiso.com/public/committees/documents.jsp?com=bic\\_espwg&directory=2015-02-23](http://www.nyiso.com/public/committees/documents.jsp?com=bic_espwg&directory=2015-02-23)

##### **Tuesday, February 24, 2015**

##### **Joint Installed Capacity/Price Responsive Load Working Group**

##### **Behind the Meter Net Generation -- Capacity Market Design Concepts**

Branka Brlosic-Nirenberg of the NYISO presented the Capacity market design concepts for the Behind the Meter Net Generator (BTM-NG) initiative. The discussion for this ICAP/PRLWG meeting addressed Capacity with BTM-NG only. Ms. Brlosic-Nirenberg displayed a timeline of the BTM-NG development showing that although the Public Service Commission's REV initiative is in parallel with BTM-NG, it will be addressed separately from the REV initiative. Ms. Brlosic-Nirenberg explained the requirements for BTM-NG Capacity eligibility. A discussion between the NYISO and stakeholders ensued with particular attention given to the interconnections for existing generation. Generators that are connected to a non-FERC jurisdictional distribution system are not subject to a Deliverability requirement and therefore



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can become a capacity supplier without satisfying the Deliverability requirement. Rules for Grandfathered CRIS (GF CRIS) eligibility state that facilities pre-dating Class Year 2007 (CY2007) were grandfathered from the Deliverability requirement. The NYISO proposal would grandfather qualifying generators, including those that are currently connected through non-FERC jurisdictional interconnection, and eliminate the process going forward by subjecting all new non-FERC jurisdictional generators to the NYISO's Class Year process in order to obtain CRIS. Stakeholders expressed several opinions on the Deliverability of eligible BTM-NG resources. Stakeholders requested that the NYISO investigate the potential quantity of MWs that may qualify for the GF CRIS and return to the ICAPWG for further discussion. There will be a presentation of the BTM-NG at the March 18, 2015 ICAPWG for additional stakeholder discussion. To see Ms. Brlosic-Nirenberg's presentation, please go to:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_icapwg/meeting\\_materials/2015-02-24/agenda%20%20BTMNG%20Capacity%20Market%20Design%20Issues\\_2-24-15%20ICAPWG.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2015-02-24/agenda%20%20BTMNG%20Capacity%20Market%20Design%20Issues_2-24-15%20ICAPWG.pdf)

#### Compliance with FERC Order on Technical Conference re: Treatment of Zone K Export Constraints into the G-J Locality

Randy Wyatt of the NYISO presented a review of the steps taken to comply with the November 25, 2014 FERC Order resulting from the February 25, 2014 FERC technical conference. The FERC Order mandated the NYISO to:

- Explore with stakeholders “whether a proposal can be developed that could reduce the cost of procuring capacity while meeting the NYISO LOLE objective.”:
- and
- “Explore the issues and evaluate the proposals discussed at the conference, including the MMU’s recommendations, through its stakeholder process and file an informational report with the Commission by June 1, 2015.”

The proposals that were raised during the Technical Conference included:

1. Treatment of Zone K export constraint limits in NYISO G-J demand curves
2. Evaluate alternative LCR methodologies
3. Evaluate rules to achieve price convergence or eliminate localities
4. Assess improved methodologies for modeling deliverability constraints and identify deliverability constraint triggers that warrant pre-definition of capacity zones
5. Consider developing a Capacity Deliverability Right for Transmission Expansion increasing the deliverability of the constrained interface

Mr. Wyatt presented each of the above topics and highlighted the dates the initiatives were addressed and the status of each of the initiatives. Additional steps to be taken in the process include a March 18, 2015 meeting at which stakeholders can present export constrained zone modeling concepts. The NYISO will continue stakeholder discussions at the April 30, 2015 ICAP WG meeting prior to submitting the June 1, 2015 informational report to FERC. To see Mr. Wyatt's complete presentation, please go to:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_icapwg/meeting\\_materials/2015-02-24/agenda%20%20Export%20Constrained%20Zones\\_ICAPWG%202-24-15\\_Final.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2015-02-24/agenda%20%20Export%20Constrained%20Zones_ICAPWG%202-24-15_Final.pdf)



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### **Wednesday, February 25, 2015**

#### **Budget Priorities Working Group**

##### **Budget vs Actual**

Tom Steinke of the NYISO presented an update on the 2014 NYISO budget versus the actual status. Mr. Steinke began by stating that the actual results are contingent upon the completion of the NYISO's financial statement audit, which is anticipated for completion by mid-March. The NYISO experienced an over-collection of \$1.4M on Rate Schedule 1 revenues for 2014. A discussion on the disposition of the over-collection will be held at the March 31, 2015 BPWG meeting. Mr. Steinke displayed tables to summarize the revenues by month in comparison to budgeted values and explained where the actual values varied from the budget. Mr. Steinke closed his presentation with a summary of the NYISO outstanding debt. To see Mr. Steinke's presentation, please go to:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/mc\\_bpwg/meeting\\_materials/2015-02-25/Agenda%20Budget vs Actual.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/mc_bpwg/meeting_materials/2015-02-25/Agenda%20Budget%20vs%20Actual.pdf)

##### **Proposal for FERC Fee Recovery**

Cheryl Hussey of the NYISO presented a proposal to revise the method by which the NYISO recovers the annual FERC fee within its budget. Stakeholders have expressed concern that the NYISO may be budgeting too conservatively as compared to the actual annual FERC Fee assessment. NYISO's RS1 revenues are collected via a fixed charge per MWh multiplied by the volume of MWhs transacted each month. As a result, NYISO's revenues follow a seasonal pattern while its expenses do not follow that same pattern. The annual FERC Fee is the largest single payment made within NYISO's budget and impacts management of NYISO's budget and cash flows. The FERC Fee is payable in mid August and covers the federal fiscal year October 1 - September 30. NYISO cannot reasonably predict the inputs to the calculation of the FERC Fee assessment. The current recovery structure can result in NYISO needing to borrow from external lines of credit to pay the FERC Fee, therefore, incurring additional debt service costs. The NYISO investigated methods used by other ISO/RTOs to recover the FERC Fee. No other ISO/RTO includes FERC Fees within its annual budget. To improve the method of FERC Fee recovery, the NYISO proposed three potential alternative collection methods outside of RS1:

1. Invoice Market Participants an estimated amount on a monthly basis based on a \$/MWh rate
2. Invoice Market Participants an estimated amount on a monthly basis based on Load Ratio Share
3. Invoice Market Participants for the actual FERC Fee amount in total after receiving the invoice in July

Ms. Hussey presented the pros and cons of each alternative while stakeholders provided input. The NYISO requested feedback on the various proposals and will continue the discussion with stakeholders at the March 31, 2015 BPWG. To see the NYISO proposals, please go

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/mc\\_bpwg/meeting\\_materials/2015-02-25/Agenda%203\\_Proposal%20for%20FERC%20Fee%20Recovery.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/mc_bpwg/meeting_materials/2015-02-25/Agenda%203_Proposal%20for%20FERC%20Fee%20Recovery.pdf)



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### 2014 Corporate Incentive Goals – One Page Summary

Jennifer Chatt of the NYISO presented the results of the NYISO incentive goals for 2014. Each year the NYISO is assigned a list of goals to achieve in order to receive the pay-at-risk portion of NYISO compensation. Ms. Chatt explained each of the goals and reported the level of success by the NYISO in reaching or surpassing each goal. Some goals that have consistently been surpassed are being replaced with new goals to guide improvement in particular areas. For 2014, due to reaching superior in several categories, the NYISO finished at 125% of total payout. To see the one page results summary of 2014 NYISO incentive goals please go to:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/mc\\_bpwg/meeting\\_materials/2015-02-25/Agenda%202014%20Corporate%20Incentive%20Goals%20-%20One-Page%20Summary.PDF](http://www.nyiso.com/public/webdocs/markets_operations/committees/mc_bpwg/meeting_materials/2015-02-25/Agenda%202014%20Corporate%20Incentive%20Goals%20-%20One-Page%20Summary.PDF)

### Wednesday, February 25, 2015

#### **Installed Capacity Working Group**

##### Forward Capacity Market: Next Steps

David Allen of the NYISO presented the proposed next steps following the release of the Analysis Group (AG) evaluation of Forward Capacity Market (FCM) for the NYISO. The NYISO will post the AG Draft Report on Friday, March 6, 2015. Written stakeholder comments on the Draft Report are requested and due by March 20, 2015. The NYISO intends to publish the AG Final Report by Friday, April 3, 2015.

##### Analysis Group: NYISO Forward Capacity Market – Evaluation of Options

Paul Hibbard and Todd Schatzki of Analysis Group (AG) presented a summary of the results following the evaluation of options in moving from the NYISO spot market capacity (SM) structure to a Forward Capacity Market (FM) structure. The comparative analysis considered:

- *Evaluate the NYISO capacity spot market (SM), and compare it to forward market (FM) structure as used in New England and PJM*
- *Consider whether current market and regulatory conditions warrant a change to the capacity market structure at this time*
- *Compare SM and FM structures qualitatively*
- *Model market outcomes for CY2020 comparing SM and FM designs*
- *Consider administrative costs/impacts*

There was an additional request to separately consider the potential impact of a FM with new entry price lock-in.

Mr. Hibbard began by introducing the methodology, assumptions and current resource conditions that would be considered in the study. A key point was emphasized that the evaluation does not consider which market structure is preferred, but determine whether or not there is cause to make the change from the current SM to a FM. Details and findings were explained and discussed with stakeholders. The final conclusions of the Draft Report are as follows:



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- The existing Capacity Market has worked reasonably well, in part due to a well-designed and functioning energy market and the NYISO's biannual Comprehensive System Planning Process (CSPP)
- Careful consideration of Capacity and other market structures is warranted, given the pace and magnitude of changes over the planning horizon
- The move to a forward market would be somewhat costly and resource intensive, but manageable with sufficient lead time
- Move to a FM would impact annual cost to load for NY consumers by -\$105 million to +\$207 million in 2020
  - Does not consider long-run changes in generation fleet
  - Depends on load forecast, level of new entry, and other factors
  - Does not consider likely incremental NYISO administrative costs
- Lock-in for new entry may reduce new entry capital costs, but poses tradeoffs
  - Discriminates against existing generation and may lead to premature retirements
  - Bidding incentives for new resources

Overall, based on the modeling of potential market outcomes and our review of associated issues, AG concludes that the move to a forward capacity market structure in New York is not warranted. The Draft Report will be posted to the NYISO website on March 6, 2015 and the NYISO will accept comments through March 20, 2015. The Final Report will be published by April 3, 2015. To see the presentation by AG, please go to:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_icapwg/meeting\\_materials/2015-02-25/AG%20ICAP%20WG%20Presentation%202%2025%202015.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2015-02-25/AG%20ICAP%20WG%20Presentation%202%2025%202015.pdf)

#### MMU Comments on the Analysis Group Findings Regarding the FCM Lock-In Provision

Pallas LeeVanSchaick of Potomac Economics (MMU) presented comments on the Analysis Group (AG) findings regarding the Forward Capacity Market (FM) Lock-In provision. Mr. LeeVanSchaick explained that AG had supplied periodic updates of the NYISO Capacity Market assessment. Mr. LeeVanSchaick highlighted the primary benefits of a Lock-In provision as detailed by the AG review and identified three significant concerns:

- Lower financial risk achieved through transfer of risk from merchant generation to load
- Discriminates against existing generation...Risk of premature retirement
- ...incentives for resources to submit offers above true costs...lock-in may exacerbate incentive by increasing reward of an above-cost new resource offer...new resource offers may time entry decisions to maximize lock-in prices

The MMU proceeded to explain the above concerns and provided the associated data.

The MMU agreed with the AG conclusion that a change to a FM is not advisable and a Lock-In provision is also not advisable. To see the presentation by Mr. LeeVanSchaick, please go to:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_icapwg/meeting\\_materials/2015-02-25/MMU%20Comments%20on%20AG%20Report\\_2-24-2015-Final.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2015-02-25/MMU%20Comments%20on%20AG%20Report_2-24-2015-Final.pdf)

**Thursday, February 26, 2015**

**Special Business Issues Committee Meeting**



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**Motion:**

The Business Issues Committee (BIC) hereby approves revisions to the Installed Capacity Manual as presented at the February 26, 2015 BIC Meeting.

**The motion passed with 100% affirmative votes.**

**Thursday, February 26, 2015**

**Joint Market Issues/Installed Capacity/Price Responsive Load Working Group**

**Announcement on HQ Wheel Proxy Pricing Issue**

Dave Edelson of the NYISO announced the following response to a pricing issue prior to presenting the Broader Regional Market Metrics:

*On January 22, 2015, a pricing error occurred regarding the ex-post proxy pricing logic employed at the HQ Chateauguay Interface. This issue was discovered within the NYISO's price correction deadline, and as such, prices were timely corrected per MST Attachment E. However, the pricing issue has existed in the software since April 2014, and has affected a number of other real-time intervals for which the NYISO's price correction deadlines have passed.*

*The issue is limited to times where all of the following conditions were present:*

- *15-minute scheduling was disabled only at the HQ Interface (i.e. not NYCA-wide)*
- *The RTC15 execution was subject to a NYCA Ramp, HQ Ramp, or HQ Total TTC constraint.*

*During these times, the HQ Import Proxy Bus (PTID 323601) had the correct External Interface Congestion added to the real-time price, however the HQ Wheel Proxy Bus (PTID 23651) did not.*

*The process for handling pricing errors that are discovered after our correction deadline is covered under our Attachment E process, and requires NYISO to notify Market Participants via a quarterly report detailing any erroneous prices discovered after the correction deadline. We intend on providing the details of these pricing errors in our Q1 2015 quarterly report. However, given the number of intervals impacted, and the duration of the pricing error, we are also bringing this to MIWG to answer any questions. It should be noted that the financial impact of these pricing errors is under \$20,000. Some additional details of the impacts:*

*Impacts:*

- *The issue impacted 348 real-time intervals, across 19 different days since April 2014.*
- *Only wheel transactions at the HQ Wheel Bus that were subjected to balancing market LBMPs during these intervals were impacted.*
- *Settlement impact is less than \$20,000.*

*To prevent a recurrence of the pricing error, the NYISO has already implemented a procedural change when disabling 15-minute scheduling to ensure that both HQ Chateauguay Proxy Buses are priced correctly. A software change to prevent a recurrence of the pricing error is also in the process of being developed for deployment this year.*

The statement by Mr. Edelson can be found on the NYISO website at:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_miwg/meeting\\_materials/2015-02-26/NYISO%20Statement%20about%20HQ%20Wheel%20Proxy%20pricing%20issue.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_miwg/meeting_materials/2015-02-26/NYISO%20Statement%20about%20HQ%20Wheel%20Proxy%20pricing%20issue.pdf)



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### Broader Regional Markets Metrics

Dave Edelson of the NYISO presented metrics for the Broader Regional Markets initiative for the month of January 2015. Several charts and graphs, including additional data requested from prior presentations, were presented showing statistics for the real-time interchange scheduling process with PJM, including CTS.

- Estimated regional production cost savings
- Bid offer/schedule volumes
- Price spread information between PJM and NYISO

Stakeholders made suggestions for consideration of additional data and, in some cases, enhanced granularity of data. The estimated regional NYISO/PJM monthly savings was documented at \$419,604.28 bringing the year-to-date total to \$419,604.28 (measured in production cost values). To see Mr. Edelson's presentation, please go to:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_miwg/meeting\\_materials/2015-02-26/Monthly%20Report%20for%20MIWG%20-Jan%202015.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_miwg/meeting_materials/2015-02-26/Monthly%20Report%20for%20MIWG%20-Jan%202015.pdf)

### Fuel Assurance Initiative: Fuel & Performance Incentives

Dr. Nicole Bouchez of the NYISO presented a continuation of the overview of potential ICAP market changes to create additional incentives for ICAP resource performance on Critical Operating Days. In a prior presentation, the NYISO proposed to utilize a unit's EFORd as a baseline to compare the unit's Critical Operating Day performance to. Dr. Bouchez introduced an alternative form of measure by proposing to use a unit's Upper Operating Limit (UOL) as the metric for performance comparison. The Performance Incentive would be calculated by comparing the Real Time Emergency Upper Operating Limit (UOLe) relative to the Day Ahead (DAM) schedule and UCAP MW over the critical operating days in the month. The net performance determines if the unit receives a charge (net under-performance below the DAM schedule) or a payment (net over-performance over the UCAP MW). The Zonal UCAP Spot Auction price is then used to calculate the performance incentive. An example was provided for additional concept clarity. Dr. Bouchez summarized the differences and similarities of the two alternative methods and led a discussion with stakeholders on the comparison. Other questions concerning the proposal were raised by Dr. Bouchez and discussed with stakeholders such as:

- *Should units that have not sold ICAP but are DAM scheduled be included in the performance incentive?*
- *Under the UOL metric, does the Critical Operating Day have to be noticed prior to noon on the day prior to the operating day for that day to be a Performance Incentive day?*

Additional examples were presented to demonstrate under and over performance calculations. The next presentation on the Fuel Assurance Initiative: Fuel & Performance Incentives is anticipated to be in March, at which time the treatment of other supply resources will be proposed for discussion. The NYISO welcomes all comments on this proposal as it continues to develop. Comments can be directed to Debbie Eckels at [deckles@nyiso.com](mailto:deckles@nyiso.com). To see Dr. Bouchez's proposal, please go to:



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[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_miwg/meeting\\_materials/2015-02-26/ICAP%20WG%20FA%20Initiative%20Presentation%20022615.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_miwg/meeting_materials/2015-02-26/ICAP%20WG%20FA%20Initiative%20Presentation%20022615.pdf)

#### Update on Demand Response Backstop Design

Emilie Nelson of the NYISO presented the update on a Demand Response (DR) backstop design. With the uncertainty surrounding the legal status of DR in the wholesale market, the NYISO recognizes the need to be prepared to minimize the market and reliability impact quickly once the courts rule on *EPSA v FERC*. The NYISO does not intend to make a filing at FERC until it receives guidance from FERC on the issue. The NYISO presented two models at the December 12, 2014 Joint ICAP and Price-Responsive Load Working Group Meeting and based on further review and stakeholder feedback, is developing a backstop proposal that reflects Model 2 from that presentation:

- LSE receives a credit to its capacity requirement for any demand side resources in its Zone, with a maximum credit limited to the LSE's capacity requirement

Ms. Nelson outlined the approach to the evaluation of changes required to implement "Model 2". The NYISO will continue to identify potential tariff changes and develop an estimate on the software changes that will be required to implement the backstop. The backstop model will be presented in greater detail for stakeholder review in March, 2015. To see Ms. Nelson's presentation, please go to:

[http://www.nyiso.com/public/webdocs/markets\\_operations/committees/bic\\_miwg/meeting\\_materials/2015-02-26/DR%20Backstop%20update%20022615.pdf](http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_miwg/meeting_materials/2015-02-26/DR%20Backstop%20update%20022615.pdf)

#### **Friday, February 27, 2015**

##### **Special Operating Committee Meeting**

##### **Motion:**

The Business Issues Committee (BIC) hereby approves revisions to the Installed Capacity Manual as presented at the February 26, 2015 BIC Meeting.

**The motion passed with 100% affirmative votes.**

#### **Friday, February 27, 2015**

##### **Electric System Planning Working Group**

##### Attachment Y Cleanup for Public Policy Transmission Planning Process

Carl Patka led the discussion that was continued from Monday, February 23, 2015 with stakeholders to reach agreement on the Developer Agreement (Agreement) for the Public Policy Transmission Planning Process. Progress was achieved through the discussion and submitted comments for the Agreement to be advanced to the full ESPWG. Further discussion will take place at the Tuesday, March 3, 2015 ESPWG in an effort to finalize the document for Operating Committee approval prior to a FERC filing. To see the documentation and written comments, please go to:

[http://www.nyiso.com/public/committees/documents.jsp?com=bic\\_espwg&directory=2015-02-23](http://www.nyiso.com/public/committees/documents.jsp?com=bic_espwg&directory=2015-02-23)





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## **FERC Filings**

February 27, 2015

NYISO filing of a motion to intervene and comments regarding Cassadaga Wind's request for waiver of one of the eligibility requirements for the Class Year Study

February 25, 2015

NYISO filing of an amended and restated large generator interconnection agreement No. 1396 between NYISO, NYSEG and Sheldon Energy

February 23, 2015

NYISO filing on behalf of Niagara Mohawk Power Corporation ("National Grid") of an Amended and Restated Interconnection Agreement (Service Agreement No. 2205) between National Grid and Covanta Niagara, L. P.

## **FERC Orders**

February 26, 2015

FERC order dismissing the TDI USA Holdings Corp. complaint v. NYISO regarding application of the buyer-side market power mitigation rules to the Champlain Hudson Express Project

February 26, 2015

FERC order granting in part the Con Ed, et. al. v NYISO complaint concerning its buyer-side mitigation rules and directing NYISO to make a compliance filing to include a competitive entry exemption in such rules

### **Link to FERC Filings and Orders:**

[http://www.nyiso.com/public/markets\\_operations/documents/tariffviewer/index.jsp](http://www.nyiso.com/public/markets_operations/documents/tariffviewer/index.jsp)