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FILE NO: 55430.000043

February 25, 2005

BY HAND

The Honorable Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

FILED
OFFICE OF THE
SECRETARY
2005 FEB 25 P 4: 28
FEDERAL ENERGY
REGULATORY COMMISSION

**Re: New York Independent System Operator, Inc.
Docket Nos. ~~ER04-1144-000~~ and ~~ER04-1144-001~~**

1003

Dear Ms. Salas:

In an order dated December 28, 2005,¹ the Commission largely accepted the Comprehensive Planning Process filing proposed by the New York Independent System Operator, Inc. ("NYISO") and directed the NYISO to make a compliance filing: (1) to address those parts of the proposed tariff that the Commission had rejected; (2) to revise a proposed Agreement Between the New York Independent System Operator, Inc. and the New York Transmission Owners on the Comprehensive Planning Process for Reliability Needs; and (3) to provide a timetable for implementation of various stages of the Reliability Needs Assessment and of the Comprehensive Reliability Plan. This filing complies with the Commission's directive.

Documents Submitted

This filing consists of the following documents:

1. This filing letter;
2. Clean version of amended tariff sheets from Attachment Y of the NYISO Open Access Transmission Tariff ("OATT") (Attachment I);

¹ *New York Independent System Operator, Inc.*, 109 FERC ¶ 61,372 (2004) ("Planning Order").

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- 3. Redlined version of the same tariff sheets, showing the proposed amendments (Attachment II) ;
- 4. Clean version of modified page 3 of the Agreement Between the New York Independent System Operator, Inc. and the New York Transmission Owners on the Comprehensive Planning Process for Reliability Needs (Attachment III);
- 5. Redlined version of the same page from the Agreement, showing the proposed modification (Attachment IV);
- 6. Implementation timetables (Attachment V); and
- 7. A form of *Federal Register* Notice (Attachment VI).

Copies of Correspondence

Copies of correspondence concerning this filing should be served on:

Robert Fernandez, Esq., Vice President and General Counsel
 Elaine Robinson, Director of Regulatory Affairs
 Elizabeth A. Grisaru, Esq.
 The New York Independent System Operator, Inc.
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Service List

In addition to serving the service list in this docket, the NYISO will electronically serve a copy of this filing on the official representative of each of its customers, on each participant in its stakeholder committees, on the New York Public Service Commission ("PSC"), and on the electric utility regulatory agencies of New Jersey and Pennsylvania, as it has done with numerous other filings. The NYISO respectfully requests a waiver of the requirements of Rule 2010 so that it may use electronic service methods. The NYISO's use of such methods has been convenient for both the NYISO and for the recipients of the service, and to date it has engendered no complaints. Allowing use of electronic service would also be consistent with the



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spirit of the Commission's recent Notice of Proposed Rulemaking on service and notification procedures.²

Compliance Filing

In the December 28 Order, the Commission required the NYISO to modify certain aspects of the Comprehensive Planning Process for Reliability Needs, now included as Attachment Y of the NYISO OATT, and the related Agreement Between the New York Independent System Operator, Inc. and the New York Transmission Owners on the Comprehensive Planning Process for Reliability Needs ("Agreement").

Several protesters raised concerns relating to the role of the New York Public Service Commission ("PSC") in the NYISO's planning process. The Commission agreed with some of these concerns and directed the NYISO to revise Sections 5.3 and 8.3 of Attachment Y. The NYISO has modified these provisions to clarify that they apply only in case of disputes that fall solely within the state agency's jurisdiction. At the same time, the NYISO has proposed changes to Section 12 that underscore the Commission's role in adjudicating disputes that fall within its exclusive jurisdiction and make clear that a joint or concurrent hearing may be available in cases where federal and state jurisdictions overlap.³

The Order also found that the original tariff language raised the possibility of undue discrimination because it required non-transmission owners to submit their proposed solutions to the staff of the New York State Public Service Commission for review, while solutions sponsored by a Transmission Owner were submitted directly to the NYISO.⁴ The NYISO's filing resolves this issue by eliminating any mandatory state review; under the revised language of Section 6.1(b), any party may seek the State's review of a proposal, at its option.

The NYISO has also responded to the Commission's concern for the lack of timetables for the various phases in the Comprehensive Reliability Planning Process. The table provided as Attachment V reflects the NYISO's estimates of the time that the different activities will take. It contemplates that the Reliability Needs Assessment will be completed over an eight month

² *Electronic Notification of Commission Issuances, Notice of Proposed Rulemaking*, 107 FERC ¶ 61,311 (2004).

³ Planning Order at P 19.

⁴ *Id.* at P 25.



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period, with up to four months allowed for detailed review of the final product by Market Participants (in addition to ongoing stakeholder participation during the study) as well as the public. The solicitation and evaluation of proposals for solutions will take place over the next several month period, with a second extensive period allotted for Market Participant discussions. Thus, the NYISO expects the entire process to extend over approximately eighteen months.

Finally, the Commission directed the NYISO to change one provision of the Agreement. The NYISO has made modifications to Section 2.02 that address the Transmission Owners' obligation to provide reasonable assistance to the parties who are responsible for constructing solutions that have been approved through the planning process. The NYISO believes this change clarifies the Transmission Owners' role in this regard.

Request for Effective Date

The NYISO respectfully requests that this filing be made effective on October 19, 2004, the effective date of its original filing.

Respectfully submitted,

A handwritten signature in black ink that reads 'Arnold H. Quint' followed by a stylized initial 'ak'.

Arnold H. Quint
Counsel for
New York Independent System Operator, Inc.

Arnold H. Quint, Esq.
Ted J. Murphy, Esq.
Hunton & Williams LLP
1900 K Street, NW
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Attachment I

New York Independent System Operator, Inc.
FERC Electric Tariff
Original Volume No. 1
Attachment Y

Substitute Original Sheet No. 952

Market Advisor for his review and consideration of whether market rules changes are necessary to address an identified failure, if any, in one of the NYISO's competitive markets. The Board may approve the RNA as submitted, or propose modifications on its own motion. If any changes are proposed by the Board, the revised RNA shall be returned to the Management Committee for comment. The Board shall not make a final determination on a revised RNA until it has reviewed the Management Committee comments. Upon approval by the Board, the NYISO shall issue the final RNA to the marketplace by posting it on its web site.

5.3 Needs Assessment Disputes

Notwithstanding any provision to the contrary in this Attachment, the NYISO OATT, or the NYISO Services Tariff, in the event that a Market Participant raises a dispute solely within the NYPSC's jurisdiction relating to the final conclusions or recommendations of the RNA, a Market Participant may refer such dispute to the NYPSC for resolution. The NYPSC's final determination shall be binding, subject only to judicial review in the courts of the State of New York pursuant to Article 78 of the NYCPLR.

5.4 Public Information Sessions

In order to provide ample exposure for the marketplace to understand the identified reliability needs, the NYISO will provide various opportunities for Market Participants and other potentially interested parties to discuss the final RNA. Such opportunities may include presentations at various NYISO Market Participant committees, focused discussions with various industry sectors, and/or presentations in public venues.

6.0 Development of Solutions to Reliability Needs

6.1 Regulated Backstop Solutions

a. The first time a Reliability Need is identified in any RNA issued under this tariff, the NYISO shall request and the Responsible TO shall provide to the NYISO, as soon as reasonably possible, a proposal for a regulated solution that shall serve as a potential backstop. Such proposals may include reasonable alternatives that would effectively address the Reliability Need. The Responsible TO shall also estimate the lead time necessary for the implementation of its proposal. The NYISO will establish a lead time for responses submitted pursuant to sections 6.2, 6.4 and 7.4 on the basis of the time period required for implementation of the proposed potential backstop solution. Contemporaneous with the request to the TO, the NYISO shall solicit responses using the two-step process defined below, which shall not be a formal RFP process.

Issued by: William J. Museler, President
Issued on: February 25, 2005
Effective: October 19, 2004
Filed to comply with order of the Federal Energy Regulatory Commission, Docket No. ER04-1144-000 and 001, issued December 28, 2004, 109 FERC ¶ 61,372 (2004).

New York Independent System Operator, Inc.
FERC Electric Tariff
Original Volume No. 1
Attachment Y

Substitute Original Sheet No. 954

b. In response to the NYISO's request, Other Developers may develop alternative regulated proposals for generation, demand side alternatives, and/or other solutions to address a Reliability Need and submit such proposals to the NYISO. Transmission Owners, at their option, may submit additional proposals for regulated solutions to the NYISO. Transmission Owners and Other Developers may submit such proposals to the NYDPS for review at any time. Subject to the execution of appropriately drawn confidentiality agreements and FERC's standards of conduct, the NYISO and the appropriate Transmission Owner or Owners shall provide Other Developers access to the data that is needed to develop their proposals. Such data shall be used only for purposes of preparing an alternative regulated proposal in response to a Reliability Need.

7.0 NYISO Evaluation of Proposed Solutions

7.1 Evaluation of Regulated Backstop Solutions

The NYISO shall evaluate a proposed regulated backstop solution submitted by a Transmission Owner pursuant to Section 6.1 to determine whether it will meet the identified Reliability Need in a timely manner, and will report the results of its evaluation in the CRP.

7.2 Evaluation of Market Based Proposals

The NYISO shall review proposals for market-based solutions and determine whether they resolve a Reliability Need. If market-based solutions are found by the NYISO to be sufficient to meet a Reliability Need in a timely manner, the NYISO will so state in the CRP. The NYISO will not select from among the market-based solutions if there is more than one proposal which will meet the same Reliability Need.

7.3 Evaluation of Alternative Regulated Responses

a. If market-based solutions do not resolve a Reliability Need, the NYISO shall proceed to review the proposed alternative regulated solutions submitted in accordance with section 6.4 above, and will report the results of its review in the CRP.

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New York Independent System Operator, Inc.
FERC Electric Tariff
Original Volume No. 1
Attachment Y

Substitute Original Sheet No. 957

Independent Market Advisor for his review. The Board may approve the draft CRP as submitted or propose modifications on its own motion. If any changes are proposed by the Board, the revised CRP shall be returned to the Management Committee for comment. The Board shall not make a final determination on the draft CRP until it has reviewed the Management Committee comments. Upon final approval by the Board, the NYISO shall issue the CRP to the marketplace by posting on its website. The NYISO will provide the CRP to the appropriate regulatory agency(ies) for consideration in their review of the proposals.

8.3 Reliability Disputes

Notwithstanding any provision to the contrary in this Attachment, the NYISO OATT, or the NYISO Services Tariff, in the event that a Market Participant raises a dispute solely within the NYPSC's jurisdiction concerning NYISO's final determination in the CRP that a proposed solution will or will not meet a Reliability Need, a Market Participant seeking further review shall refer such dispute to the NYPSC for resolution. The NYPSC's final determination of such disputes shall be binding, subject only to judicial review in the courts of the State of New York pursuant to Article 78 of the New York Civil Practice Law and Rules.

8.4 Determination of Necessity

a. If the NYISO determines in the CRP that implementation of a regulated solution is necessary, the NYISO will request the Responsible TO to submit its proposal for a backstop regulated solution to the appropriate state regulatory agency(ies) to begin the approval process. The Responsible TO in response to the NYISO request shall make such a submission. Other Developers proposing alternative regulated solutions pursuant to Section 6.4.b that have completed any changes required by the NYISO under Section 7.3.b, which the NYISO has determined will resolve the identified deficiencies, may submit these proposals to the appropriate state regulatory agency(ies) for review.

b. If the NYISO determines in the CRP that it is necessary for the Responsible TO to proceed with the regulated solution identified in 8.4.a in parallel with a market-based solution in order to ensure that a Reliability Need is met in a timely manner, the Responsible TO shall proceed with due diligence to develop it in accordance with Good Utility Practice unless or until notified by the NYISO that it has determined that the regulated solution is no longer needed.

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New York Independent System Operator, Inc.
FERC Electric Tariff
Original Volume No. 1
Attachment Y

Substitute Original Sheet No. 961

d. Costs related to regulated non-transmission reliability projects will be recovered by the Transmission Owners in accordance with the provisions of New York Public Service Law.

12.0 FERC Role in Dispute Resolution

Disputes directly relating to the NYISO's compliance with its tariffs that are not resolved in the internal NYISO appeals process and all disputes relating to matters that fall within the exclusive jurisdiction of FERC shall be reviewed at FERC pursuant to the Federal Power Act if such review is sought by a Market Participant. The NYPSC or any party to a dispute regarding matters over which both the NYPSC and FERC have jurisdiction and responsibility for action may submit a request to FERC for a joint or concurrent hearing to resolve the dispute.

13.0 Non-Jurisdictional Entities

LIPA's and NYPA's participation in the NYISO Comprehensive Reliability Planning Process shall in no way be considered to be a waiver of their non-jurisdictional status pursuant to Section 201(f) of the Federal Power Act, including with respect to the FERC's exercise of the Federal Power Act's general ratemaking authority.

14.0 Tax Exempt Financing Provisions

Con Edison, NYPA and LIPA shall not be required to construct, or cause to construct, a transmission facility identified through the NYISO Comprehensive Reliability Planning Process if such construction would result in the loss of tax-exempt status of any tax-exempt bond issued by Con Edison, NYPA or LIPA, or impair their ability to secure future tax-exempt financing.

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Attachment II

New York Independent System Operator, Inc.
FERC Electric Tariff
Original Volume No. 1
Attachment Y

Substitute Original Sheet No. 952 |

Market Advisor for his review and consideration of whether market rules changes are necessary to address an identified failure, if any, in one of the NYISO's competitive markets. The Board may approve the RNA as submitted, or propose modifications on its own motion. If any changes are proposed by the Board, the revised RNA shall be returned to the Management Committee for comment. The Board shall not make a final determination on a revised RNA until it has reviewed the Management Committee comments. Upon approval by the Board, the NYISO shall issue the final RNA to the marketplace by posting it on its web site.

5.3 Needs Assessment Disputes

Notwithstanding any provision to the contrary in this Attachment, the NYISO OATT, or the NYISO Services Tariff, in the event that a Market Participant raises a dispute solely within the NYPSC's jurisdiction relating to the final conclusions or recommendations of the RNA, a Market Participant may refer such dispute to the NYPSC for resolution. The NYPSC's final determination shall be binding, subject only to judicial review in the courts of the State of New York pursuant to Article 78 of the NYCPLR.

5.4 Public Information Sessions

In order to provide ample exposure for the marketplace to understand the identified reliability needs, the NYISO will provide various opportunities for Market Participants and other potentially interested parties to discuss the final RNA. Such opportunities may include presentations at various NYISO Market Participant committees, focused discussions with various industry sectors, and/or presentations in public venues.

6.0 Development of Solutions to Reliability Needs

6.1 Regulated Backstop Solutions

a. The first time a Reliability Need is identified in any RNA issued under this tariff, the NYISO shall request and the Responsible TO shall provide to the NYISO, as soon as reasonably possible, a proposal for a regulated solution that shall serve as a potential backstop. Such proposals may include reasonable alternatives that would effectively address the Reliability Need. The Responsible TO shall also estimate the lead time necessary for the implementation of its proposal. The NYISO will establish a lead time for responses submitted pursuant to sections 6.2, 6.4 and 7.4 on the basis of the time period required for implementation of the proposed potential backstop solution. Contemporaneous with the request to the TO, the NYISO shall solicit responses using the two-step process defined below, which shall not be a formal RFP process.

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New York Independent System Operator, Inc.
FERC Electric Tariff
Original Volume No. 1
Attachment Y

Substitute, Original Sheet No. 954

b. In response to the NYISO's request, Other Developers may develop alternative regulated proposals for generation, demand side alternatives, and/or other solutions to address a Reliability Need and submit such proposals to the NYISO. Transmission Owners, at their option, may submit additional proposals for regulated solutions to the NYISO. Transmission Owners and Other Developers shall may submit such proposals to the NYDPS for review at any time. Subject to the execution of appropriately drawn confidentiality agreements and FERC's standards of conduct, the NYISO and the appropriate Transmission Owner or Owners shall provide Other Developers access to the data that is needed to develop their proposals. Such data shall be used only for purposes of preparing an alternative regulated proposal in response to a Reliability Need. ~~Proposals sponsored by Other Developers that satisfy the NYDPS may be submitted by the respective Other Developer to the NYISO for review under this tariff.~~

7.0 NYISO Evaluation of Proposed Solutions

7.1 Evaluation of Regulated Backstop Solutions

The NYISO shall evaluate a proposed regulated backstop solution submitted by a Transmission Owner pursuant to Section 6.1 to determine whether it will meet the identified Reliability Need in a timely manner, and will report the results of its evaluation in the CRP.

7.2 Evaluation of Market Based Proposals

The NYISO shall review proposals for market-based solutions and determine whether they resolve a Reliability Need. If market-based solutions are found by the NYISO to be sufficient to meet a Reliability Need in a timely manner, the NYISO will so state in the CRP. The NYISO will not select from among the market-based solutions if there is more than one proposal which will meet the same Reliability Need.

7.3 Evaluation of Alternative Regulated Responses

a. If market-based solutions do not resolve a Reliability Need, the NYISO shall proceed to review the proposed alternative regulated solutions submitted in accordance with section 6.4 above, and will report the results of its review in the CRP.

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Independent Market Advisor for his review. The Board may approve the draft CRP as submitted or propose modifications on its own motion. If any changes are proposed by the Board, the revised CRP shall be returned to the Management Committee for comment. The Board shall not make a final determination on the draft CRP until it has reviewed the Management Committee comments. Upon final approval by the Board, the NYISO shall issue the CRP to the marketplace by posting on its website. The NYISO will provide the CRP to the appropriate regulatory agency(ies) for consideration in their review of the proposals.

8.3 Reliability Disputes

Notwithstanding any provision to the contrary in this Attachment, the NYISO OATT, or the NYISO Services Tariff, in the event that a Market Participant raises a disputes solely within the NYPSC's jurisdiction concerning NYISO's final determination in the CRP that a proposed solution will or will not meet a Reliability Need, a Market Participant seeking further review shall refer such dispute to the NYPSC for resolution. The NYPSC's final determination of such disputes shall be binding, subject only to judicial review in the courts of the State of New York pursuant to Article 78 of the New York Civil Practice Law and Rules.

8.4 Determination of Necessity

a. If the NYISO determines in the CRP that implementation of a regulated solution is necessary, the NYISO will request the Responsible TO to submit its proposal for a backstop regulated solution to the appropriate state regulatory agency(ies) to begin the approval process. The Responsible TO in response to the NYISO request shall make such a submission. Other Developers proposing alternative regulated solutions pursuant to Section 6.4.b that have completed any changes required by the NYISO under Section 7.3.b, which the NYISO has determined will resolve the identified deficiencies, may submit these proposals to the appropriate state regulatory agency(ies) for review.

b. If the NYISO determines in the CRP that it is necessary for the Responsible TO to proceed with the regulated solution identified in 8.4.a in parallel with a market-based solution in order to ensure that a Reliability Need is met in a timely manner, the Responsible TO shall proceed with due diligence to develop it in accordance with Good Utility Practice unless or until notified by the NYISO that it has determined that the regulated solution is no longer needed.

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d. Costs related to regulated non-transmission reliability projects will be recovered by the Transmission Owners in accordance with the provisions of New York Public Service Law.

12.0 FERC Role in Dispute Resolution

Disputes directly relating to the NYISO's compliance with its tariffs that are not resolved in the internal NYISO appeals process and all disputes relating to matters that fall within the exclusive jurisdiction of FERC shall be reviewed at the Federal Energy Regulatory Commission FERC pursuant to the Federal Power Act if such review is sought by a Market Participant. The NYPSC or any party to a dispute regarding matters over which both the NYPSC and FERC have jurisdiction and responsibility for action may submit a request to FERC for a joint or concurrent hearing to resolve the dispute.

13.0 Non-Jurisdictional Entities

LIPA's and NYPA's participation in the NYISO Comprehensive Reliability Planning Process shall in no way be considered to be a waiver of their non-jurisdictional status pursuant to Section 201(f) of the Federal Power Act, including with respect to the FERC's exercise of the Federal Power Act's general ratemaking authority.

14.0 Tax Exempt Financing Provisions

Con Edison, NYPA and LIPA shall not be required to construct, or cause to construct, a transmission facility identified through the NYISO Comprehensive Reliability Planning Process if such construction would result in the loss of tax-exempt status of any tax-exempt bond issued by Con Edison, NYPA or LIPA, or impair their ability to secure future tax-exempt financing.

Issued by: William J. Museler, President

Effective: October 19, 2004

Issued on: ~~August-February 2005~~, 2004

Filed to comply with order of the Federal Energy Regulatory Commission, Docket No. ER04-1144-000 and 001, issued December 28, 2004, 109 FERC ¶ 61,372 (2004).

Attachment III

2.01 Each Transmission Owner agrees that the appropriate Transmission Owner will prepare regulated proposals in accordance with the provisions of the Planning Process and to assist the NYISO in the NYISO's evaluation of such proposals.

2.02 Each Transmission Owner agrees to develop and construct (or cause to be developed and/or constructed) projects necessary to meet reliability needs on the bulk power facilities identified in the Comprehensive Reliability Plan and which the NYISO has determined will address the identified reliability needs. The NYISO shall make a determination that a regulated reliability project will be implemented by a Transmission Owner only after it has determined that no viable market-based response will adequately address the identified reliability need. For purposes of this Agreement, the "bulk power facilities" shall be those facilities identified as the New York State Bulk Power Transmission Facilities in the annual Area Transmission Review submitted to the Northeast Power Coordinating Council ("NPCC") by the NYISO pursuant to NPCC requirements. The Transmission Owner shall provide reasonable assistance, where possible, in accordance with the provisions of the NYISO OATT, to those parties that are responsible for developing solutions that have been evaluated in the NYISO Comprehensive Reliability Plan.

2.03 The Transmission Owners agree to proceed with the development and construction of a project to meet a specific reliability need, pursuant to the provisions of Section 2.02, in parallel with one or more market-based projects to meet the reliability need if the NYISO in the Comprehensive Reliability Plan concludes that such a parallel effort is necessary to ensure that reliability needs will be met in a timely manner.

ARTICLE 3.0: CONDITIONS OF THE TRANSMISSION OWNER OBLIGATIONS

The Transmission Owners' obligations described in Sections 2.02 and 2.03 hereof shall be subject to the following conditions:

3.01 Full recovery in rates by the Transmission Owner of all reasonably incurred costs related to the preparation of proposals for, and the development, construction, operation and

Attachment IV

2.01 Each Transmission Owner agrees that the appropriate Transmission Owner will prepare regulated proposals in accordance with the provisions of the Planning Process and to assist the NYISO in the NYISO's evaluation of such proposals.

2.02 Each Transmission Owner agrees to develop and construct (or cause to be developed and/or constructed) projects necessary to meet reliability needs on the bulk power facilities identified in the Comprehensive Reliability Plan and which the NYISO has determined will address the identified reliability needs. The NYISO shall make a determination that a regulated reliability project will be implemented by a Transmission Owner only after it has determined that no viable market-based response will adequately address the identified reliability need. For purposes of this Agreement, the "bulk power facilities" shall be those facilities identified as the New York State Bulk Power Transmission Facilities in the annual Area Transmission Review submitted to the Northeast Power Coordinating Council ("NPCC") by the NYISO pursuant to NPCC requirements. The Transmission Owner shall provide reasonable assistance, where possible, in accordance with the provisions of the NYISO OATT, to those parties that are responsible for developing solutions that have been evaluated in the NYISO Comprehensive Reliability Plan.

2.03 The Transmission Owners agree to proceed with the development and construction of a project to meet a specific reliability need, pursuant to the provisions of Section 2.02, in parallel with one or more market-based projects to meet the reliability need if the NYISO in the Comprehensive Reliability Plan concludes that such a parallel effort is necessary to ensure that reliability needs will be met in a timely manner.

ARTICLE 3.0: CONDITIONS OF THE TRANSMISSION OWNER OBLIGATIONS

The Transmission Owners' obligations described in Sections 2.02 and 2.03 hereof shall be subject to the following conditions:

3.01 Full recovery in rates by the Transmission Owner of all reasonably incurred costs related to the preparation of proposals for, and the development, construction, operation and

Attachment V

**NEW YORK ISO COMPREHENSIVE PLANNING PROCESS FOR RELIABILITY NEEDS
TIMELINE**

ID	Task Name	Begin	End	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug		
1	NYISO COMPREHENSIVE RELIABILITY PLANNING PROCESS	January	June	[Summary Bar]																						
2	Submission of Data Inputs	January	February	[Task Bar]																						
3	TOs Submit Transmission Plans	January	February	[Task Bar]																						
4	Neighboring Control Area Assessments	January	February	[Task Bar]																						
5	Transmission Owner Input	January	February	[Task Bar]																						
6	Stakeholder Input	January	February	[Task Bar]																						
7	Develop Base Case & Scenarios	March	March	[Summary Bar]																						
8	Develop Base Case	March	March	[Task Bar]																						
9	Develop Scenarios	March	March	[Task Bar]																						
10	Reliability Needs Assessment	April	August	[Summary Bar]																						
11	Load & Capacity Data Book Screening Process	April	August	[Task Bar]																						
12	Transmission Adequacy Assessment	April	August	[Task Bar]																						
13	Develop MW Transfer Capability for Resource Delivery	April	August	[Task Bar]																						
14	Resource Adequacy Assessment	April	August	[Task Bar]																						
15	Short Circuit Assessment	April	August	[Task Bar]																						
16	Baseline Reliability Needs Assessment	April	August	[Task Bar]																						
17	Evaluation of Alternative Reliability Scenarios	April	August	[Task Bar]																						
18	Perform Sensitivity Studies	April	August	[Task Bar]																						
19	RNA Draft Report Preparation	April	August	[Task Bar]																						
20	RNA Review & Approval Process	September	December	[Summary Bar]																						
21	TPAS & ESPWG Review of Draft RNA	September	September	[Task Bar]																						
22	OC / MC RNA Vote	October	October	[Task Bar]																						
23	NYISO BOD Action on RNA & Independent Market Advisor Review	November	November	[Task Bar]																						
24	Issue / Post Final RNA	November	November	[Task Bar]																						
25	Conduct Public Information Sessions	November	December	[Task Bar]																						
26	Development of Solutions to Reliability Needs	December	January	[Summary Bar]																						
27	Request Proposal for Regulated Backstop Solution	December	January	[Task Bar]																						
28	Conduct Two Step Process for Response Solicitation	December	January	[Task Bar]																						
29	Assess Submittals for Procedural Solutions to Reliability Needs	December	January	[Task Bar]																						
30	NYISO Evaluation of Proposed Solutions	February	March	[Summary Bar]																						
31	Evaluation of Regulated Backstop Solution	February	March	[Task Bar]																						
32	Evaluation of Market Based Proposals	February	March	[Task Bar]																						
33	Evaluation of Alternative Regulated Responses (With PSC)	February	March	[Task Bar]																						
34	NYISO to Identify & Resolve Deficiencies in Proposed Solutions	February	March	[Task Bar]																						
35	NYISO Recommends Regulated Backstop Solution	February	March	[Task Bar]																						
36	NYISO Cost Allocation Analysis	February	March	[Task Bar]																						
37	Prepare Draft CRP	March	March	[Task Bar]																						
38	CRP Review & Approval Process	April	June	[Summary Bar]																						
39	TPAS & ESPWG Review of Draft CRP	April	April	[Task Bar]																						
40	OC / MC CRP Vote	May	May	[Task Bar]																						
41	NYISO BOD Action on CRP / Independent Market Advisor Review	June	June	[Task Bar]																						
42	Issue / Post Final CRP	June	June	[Task Bar]																						

Project: NYISO CRPP Timeline Rev 3

Task [Bar] Milestone [Diamond] Summary [Arrow]

Attachment VI

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

New York Independent System Operator, Inc.

Docket No. ER04-___-000

NOTICE OF FILING

(_____, 2004)

Take notice that on February 25, 2005 the New York Independent System Operator, Inc. (NYISO) filed tariff amendments for Commission action. The proposed amendments modify aspects of Attachment Y to the NYISO's OATT in accordance with the Commission's order approving in part and rejecting in part the NYISO's original filing of its comprehensive reliability planning process. The NYISO also proposed changes to the Agreement Between the New York Independent System Operator, Inc. and the New York Transmission Owners on the Comprehensive Planning Process for Reliability Needs and has supplied an implementation timetable.

NYISO states that it has electronically served a copy of this filing on the official representative of each of its customers, on each participant in its stakeholder committees, on the New York State Public Service Commission, and on the electric utility regulatory agencies of New Jersey and Pennsylvania.

Any person desiring to intervene or to protest this filing should file with the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426, in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211 and 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a motion to intervene. All such motions or protests should be filed on or before the comment date, and, to the extent applicable, must be served on the applicant and on any other person designated on the official service list. This filing is available for review at the Commission or may be viewed on the Commission's web site at <http://www.ferc.gov>, using the eLibrary (FERRIS) link. Enter the docket number excluding the last three digits in the docket number field to access the document. For assistance, please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll-free at (866)208-3676, or for TTY, contact (202)502-8659. Protests and interventions may be filed electronically via the Internet in lieu of paper; see 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site under the "e-Filing" link. The Commission strongly encourages electronic filings.

Comment Date:

Magalie R. Salas
Secretary