

NYISO Comprehensive Planning Process for Reliability Needs

Proposed Changes Submitted by Howard Fromer, PSEG

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Subject: ESPWG - Stakeholder Comments on the Proposed Tariff Language for Comprehensive Planning Process for Reliability Needs

I concur with Doreen's suggested modifications. However, I am concerned about the process going forward for resolving the various changes to the Tariff being proposed at this time. Some of the changes suggested by the TOs in the document just circulated by the ISO exacerbate the problems that Doreen's modifications seek to rectify. Still other TO proposed changes would add language to the controversial dispute resolution provisions that go beyond what was approved by the MC, and seek to elevate sections 5.2.1 and 8.3 ("Notwithstanding any provision to the contrary in this Attachment ...")over section 12. The goal of this exercise should be simply to take the words in the document approved by the MC and put them into appropriately numbered and sequenced sections of a Tariff attachment. It is not the purpose of this exercise to rewrite what the MC approved in order to subtly revise the meaning of intentionally ambiguous provisions that were put into the MC document as a compromise. I am requesting that whomever is responsible for reviewing all these revisions circulate another complete black lined draft tariff showing changes to what the ISO circulated on July 16, well in advance of the time the Chairs will be asked to approve the Tariff, so that those of us with concerns have sufficient time to review the draft and can convey any remaining concerns to one or more of the Chairs.

Howard Fromer