

NYISO Comprehensive Planning Process for Reliability Needs

Proposed Changes Submitted by Tim Foxen, NRG Energy

At the last ESPWG meeting, it was pointed out that two acronyms were being used for the Public Service Commission - NYPSC and NYDPS. The PSC (or DPS) persons present at this meeting agreed to provide definitions of these two terms - not just spelling out the words - so that a reader could distinguish between the two as they are referred to in the body of the document. This distinction is not clear at present. Although the difference between "the New York Public Service Commission" and the "NY Department of Public Service" might convey substantive nuances to insiders in NY politics and policy-making, it would be presumptuous to assume that persons at FERC, and other market participants are aware of these nuances. Therefore, the PSC should be reminded to explain the two terms distinctions in the definition section of the document, with the intent to make readers aware of the policy and oversight distinctions between the two parts of this regulatory body. I believe one generally refers to "staff" and the other to the "Commission". The Commission would tend to be more prone to political pressures. On the other hand, I believe the staff reports to the Commission, so I am still not clear why the distinction is necessary. If the distinction is not necessary, it should be taken out and only one term should be used.

The PSC suggested definitions should be distributed to participants prior to final sign-off by chairs, as has been the case with all the other comments received up to now.

Thank you.

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