

2017 Project Prioritization & Budgeting Process

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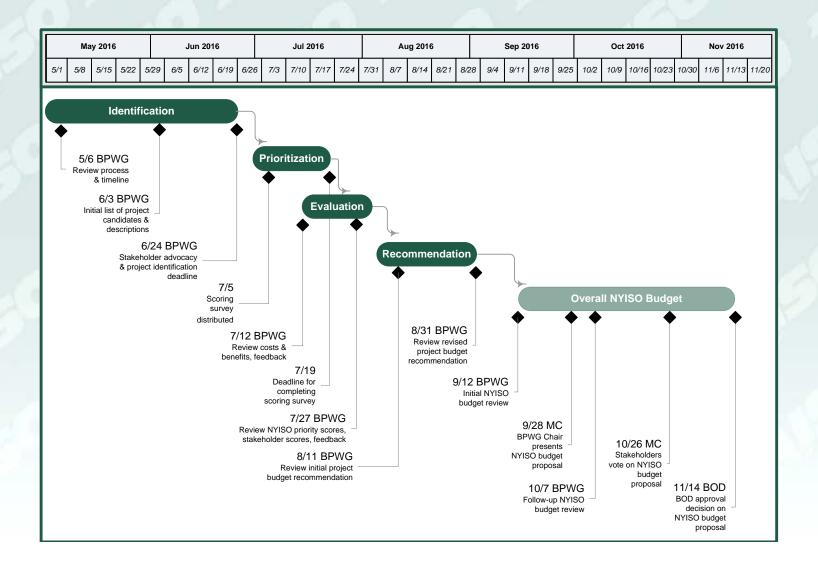
Budget & Priorities Working Group

August 31, 2016 Krey Corporate Center

2017 Project Prioritization Process

Phase	Description
Identification	This phase involves developing the list of project candidates taking into consideration regulatory obligations, strategic initiatives, State of the Market recommendations, necessary infrastructure enhancements, product plans, stakeholder feedback, etc.
Prioritization	The phase involves the NYISO and stakeholder scoring of projects. The NYISO scores projects using objective criteria that reflects strategic alignment, expected outcomes, risks, and ability to execute. Stakeholders score projects based on their organizational priorities via a survey mechanism.
Evaluation	This phase involves performing a feasibility assessment based on detailed cost and labor estimates, dependencies, priority scores, and stakeholder feedback.
Recommendation	This phase involves proposing a feasible set of project deliverables and related budget requirements. The proposal is refined as needed based on stakeholder feedback.

2017 Project Prioritization Timeline



Stakeholder Feedback

Feedback	NYISO Response
There was a request to reconsider including Automate ICAP Import Rights.	The project budget has been updated to include the Automate ICAP Import Rights project with a System Design deliverable.
There was a request to reconsider including Incremental External CRIS Rights.	The NYISO is unable to accommodate this request due to resource constraints. The NYISO believes that the other efforts identified for the Capacity Market Products team represent higher value efforts.
There was a request to reconsider including Forward Capacity Market.	The NYISO is unable to accommodate this request due to resource constraints. The NYISO believes that the other efforts identified for the Capacity Market Products team represent higher value efforts.
There was a request to reconsider including Fuel Assurance – Constrained Fuel Supply Bidding.	Considering the limited stakeholder support this has received to date, the NYISO will instead focus first on Energy Storage, Distributed Energy Resources, and Performance Assurance.
There was a request to reconsider including Model 100+KV Transmission Constraints.	The project budget has been updated to include the Model 100+KV Transmission Constraints project with a Study deliverable.
There was a request to reconsider a deployment deliverable for Hybrid GT Pricing.	The project budget has been updated to reflect a Deploy deliverable for the Hybrid GT Pricing project.
There was a request to reconsider including DAM Scheduling for ICAP Suppliers.	The NYISO is unable to accommodate this request due to resource constraints. The NYSO believes that the other efforts identified for the Energy Markets Product team represent higher value efforts.
There was a request to reconsider including Startup Cost Compensation.	The NYISO is unable to accommodate this request due to resource constraints. The NYSO believes that the other efforts identified for the Energy Markets Product team represent higher value efforts.
There was a request to report on the implementation timeline for the North Subzone Redistricting project.	The North Subzone Redistricting project is currently anticipated to deploy in 2018.

Recommended Budget by Product Area

			Estimated Cos	t (in millions \$)		
Product Area	Labor	Capital	Prof. Services	Total	Mandatory	Continuing
Business Intelligence Products	0.97	-	0.56	1.53	0.31	0.28
Capacity Market Products	3.47	-	1.07	4.54	0.70	0.55
Demand Response	0.28	-	0.15	0.43	-	0.18
Energy Market Products	0.86	0.01	0.45	1.31	-	0.39
Enterprise Products	2.63	5.92	0.74	9.29	-	4.73
Finance Products	1.29	0.05	0.09	1.42	-	0.57
Operations and Reliability Products	4.93	1.40	9.72	16.05	-	15.43
Planning Products	0.47	-	0.30	0.77	-	0.46
TCC Market Products	0.53	0.01	0.43	0.96	-	0.96
Total Cost	15.43	7.38	13.51	36.31	1.01	23.55
Total Cost less EMS/BMS Upgrade	11.10	6.18	4.59	21.87	1.01	9.10

Red text identifies revisions from last presentation

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Project	NYISO	Stake-	ority Sco Weight	Org	Sector Count	Deliverable		ted Cos Capital	Prof.	
Business Intelligence Products										
NAESB PKI Phase 2		MA	ANDATO	RY		Deploy	0.31	0.00	0.00	0.31
Enterprise Information Management - Data Integration Phase III		CC	NTINUI	NG		Development Complete	0.28	0.00	0.00	0.28
Customer Relationship Management Tool	237	51	24	6	3	Deploy	0.08	0.28	0.00	0.36
Public Website Calendar	193	15	21	4	2	Architecture Design	0.05	0.00	0.00	0.05
Secure Communications ¹	186	16	17	3	2	Deploy	0.14	0.00	0.00	0.14
Public Website Refresh	181	36	24	4	2	Architecture Design	0.15	0.00	0.26	0.41
eTariff Webviewer Enhancements	175	53	38	10	2	Deploy	0.04	0.00	0.02	0.06
Key Topics Tracking for Public Website	160	21	18	4	2	Deploy	0.07	0.00	0.00	0.07
Mobile Applications	146	15	20	3	2	Deploy	0.08	0.00	0.15	0.23

¹ The most critical elements of the Secure Communications project were deployed in 2016 so the relative priority has been reduced

		Pric	ority Sco	ores Org	Sector		Estima	ted Cost	i (in mil Prof.	lions \$)
<u>Project</u>	NYISO			Count	Count		Labor	Capital	Serv.	Total
Capacity Market Products										
RMR Cost Recovery Phase II		MA	NDATO	RY		Functional Requirements	0.28	0.00	0.00	0.28
Demand Curve Reset		MA	NDATO	RY		Study	0.04	0.00	0.06	0.10
Demand Curve Reset Annual Updates		MA	NDATO	RY		Deploy	0.25	0.00	0.09	0.34
Elimination of Capacity Zones (SOM)#		CC	NTINUI	NG		Market Design Complete	0.55	0.00	0.00	0.55
Alternative Methods for Determining LCRs (SOM)#	759	278	236	20	4	Market Design Complete	0.41	0.00	0.64	1.05
Treatment of Capacity Exports from Localities (SOM 8)#	723	41	69	7	4	Market Design Complete	0.82	0.00	0.00	0.82
Performance Assurance	546	54	70	7	2	Study	0.15	0.00	0.21	0.36
ICAP AMS Redesign & Testing Improvements Phase 1	479	77	47	9	4	Deploy	0.46	0.00	0.00	0.46
Automate ICAP Import Rights	454	25	15	3	2	System Design	0.03	0.00	0.00	0.03
Modifications to GADS Reporting Software for IIFO	449	1	0	1	0	Deploy	0.02	0.00	0.09	0.11
GADS Reporting	364	61	33	7	2	System Design	0.08	0.00	0.00	0.08

[#] These efforts each explore interrelated concepts of capacity zone requirements.

Project	NYISO	Stake-		Org	Sector Count	Deliverable		ted Cos Capital	Prof.	lions \$	
Capacity Market Products											
Forward Capacity Market	350	149	110	11	4	Concept Proposed	0.23	0.00	0.00	0.23	
BSM to Address Other Price Suppression Actions (SOM 5)	349	70	72	5	2	Concept Proposed	0.76	0.00	0.00	0.76	
Capacity Transfer Rights for Internal Transmission Upgrades (SOM)	337	14	20	4	2	Concept Proposed	1.05	0.00	0.00	1.05	
Economically Allocate Import Rights	330	1	0	1	0	Concept Proposed	0.83	0.00	0.00	0.83	
Fuel Assurance - Dual Fuel Requirements for Gas-Fired Generators	299	21	40	2	1	Concept Proposed	0.63	0.00	0.00	0.63	
On Ramps and Off Ramps for Zones ²	295	61	35	6	2	Concept Proposed	0.47	0.00	0.00	0.47	
Incremental External CRIS Rights	263	61	25	3	1	Market Design Complete	0.57	0.00	0.00	0.57	
Incremental Enhancement to BSM Forecasts of ICAP Prices (SOM)	246	71	66	8	4	Concept Proposed	0.31	0.00	0.00	0.31	
Dynamic Creation of Zones	215	91	72	7	2	Concept Proposed	0.71	0.00	0.00	0.71	

² Elimination of Capacity Zones is expected to necessitate consideration of On Ramps and Off Ramps for Zones so it is prudent to consider these together

		Pric	ority Sco	ores			Estima	ted Cos	t (in mil	lions \$)
Project	NYISO	Stake-		Org	Sector Count	Deliverable		Capital	Prof.	Total
Demand Response Products										
Distributed Energy Resource Program Design		CC	NTINUI	NG		Concept Proposed	0.18	0.00	0.00	0.18
NYISO Pilot Framework	498	306	189	13	4	Market Design Complete	0.01	0.00	0.07	0.08
Granular Pricing & Market Price Delivery	373	61	52	7	3	Concept Proposed	0.03	0.00	0.00	0.03
Meter Data Policy	346	83	65	9	3	Study	0.06	0.00	0.09	0.14
Limited Resource Performance Obligations: Evaluate Minimum Performance Obligation for Capacity Resources ³	344	183	184	13	5	Market Design Complete	0.06	0.00	0.00	0.06
Business Objects Enhancements for DRIS Data	289	30	20	2	2	Deploy	0.06	0.00	0.00	0.06
State of Charge Management for Energy Storage ³	281	126.5	52	11	4	Development Complete	0.08	0.00	0.00	0.08

³ Evaluation of Minimum Performance Obligations and State of Charge Management are expected to be addressed as part of the Distributed Energy Resource roadmap

Project Energy Market Products	NYISO	Pric Stake- holder	ority Sco Weight	Org	Sector Count	Deliverable		ted Cos Capital	Prof.	lions \$) Total
ConEd/PSEG Wheel (SOM)		CC	NTINUI	NG		Deploy	0.26	0.01	0.10	0.37
Hybrid GT Pricing Improvements (SOM)		CC	NTINUI	NG		Deploy	0.03	0.00	0.00	0.03
Energy Storage Integration & Optimization	748	303.5	111	18	5	Concept Proposed	0.10	0.00	0.00	0.10
Integrating Public Policy	732	422	402	27	5	Study	0.31	0.00	0.35	0.66
Fuel Assurance - Constrained Fuel Supply Bidding (SOM) ⁴	642	44	58	6	4	Study	0.09	0.00	0.00	0.09
Model 100+KV Transmission Constraints (SOM)	568	227	141	13	4	Study	0.04	0.00	0.00	0.04
Graduated Transmission Demand Curves (SOM)	471	146	34	6	2	Market Design Complete	0.03	0.00	0.00	0.03
RTC/RTD Forward Horizon Coordination Improvements (SOM)	454	144	119	12	5	Study	0.09	0.00	0.00	0.09
Ontario Pricing	373	33	8	3	1	Market Design Complete	0.03	0.00	0.00	0.03
Review of RACT Compliance Plans (SOM)	345	9	8	3	1	Concept Proposed	0.07	0.00	0.00	0.07
Outage Analysis Tool	343	16	24	4	2	Study	0.07	0.00	0.00	0.07
Long Island PAR Optimization & Financial Rights (SOM)	339	36	36	7	3	Concept Proposed	0.10	0.00	0.00	0.10

⁴ The relative priority for Fuel Assurance: Constrained Fuel Supply Bidding has been reduced due to limited stakeholder interest and to allow for focusing on Energy Storage Integration, the Distributed Energy Resource roadmap, and Performance Assurance first.

		Prid	ority Sco	ores			 Estimated Cost (in millions \$)						
Project	NYISO	Stake-		Org	Sector Count	Deliverable		Capital	Prof.	Total			
Energy Market Products													
Startup Cost Compensation	311	70	78	6	3	Concept Proposed	0.03	0.00	0.00	0.03			
5-Minute Transaction Scheduling (SOM)	291	90	19	4	2	Concept Proposed	0.05	0.00	0.00	0.05			
Scarcity Pricing Tariff Revision	275	9	14	3	1	Deploy	0.06	0.00	0.22	0.28			
Offer Cap Enhancement for FERC	254	71	35	3	1	Concept Proposed	0.05	0.00	0.00	0.05			
Eliminate Fees for CTS Transactions with PJM (SOM)	247	299	130	12	3	Concept Proposed	0.05	0.00	0.00	0.05			
DAM Scheduling for ICAP Suppliers	240	43	42	7	4	Deploy	0.32	0.00	0.30	0.62			
Quarterly Congestion Reporting	219	26	19	3	2	Deploy	0.13	0.00	0.00	0.13			
Reinstitute Import Guarantees	209	231	106	7	1	Concept Proposed	0.10	0.00	0.00	0.10			
Changes to Selkirk Market Modeling	206	129	33	5	2	Market Design Complete	0.13	0.00	0.00	0.13			
Fractional MW Load Bidding	195	99	12	6	2	Concept Proposed	0.05	0.00	0.00	0.05			
ACD Dataset Reporting	138	1	0	1	0	Deploy	0.06	0.00	0.00	0.06			
Integration of OFO status into SUEDE	102	1	0	1	0	Development Complete	0.14	0.00	0.00	0.14			

			prity Sco	pres	.		Estima	ted Cos	t (in mil	ions \$)
Post to at	, , , , , , , , , , , , , , , , , , ,	Stake-		Org	Sector		l		Prof.	Total
Project Project	INTISO	holder	weignt	Count	Count	Deliverable	Labor	Capital	Serv.	Total
Enterprise Products										
Storage Infrastructure Redesign Phase III		CC	NTINUI	NG		Deploy	0.19	3.21	0.02	3.41
Telephony System Upgrade		CC	NTINUI	NG		Deploy	0.33	0.00	0.15	0.48
Application Platform Upgrade Phase IV		CC	NTINUI	NG		Deploy	0.35	0.39	0.10	0.84
Backup Enhancements	415	1	0	1	0	Deploy	0.18	1.75	0.06	1.99
Enterprise Job Scheduling Upgrade	333	6	5	2	1	Deploy	0.12	0.06	0.15	0.34
Software AG Upgrade	322	1	0	1	0	Deploy	0.26	0.27	0.08	0.61
Marketplace and Webforms Technology Upgrade ⁵	265	1	0	1	0	Deploy	0.16	0.00	0.02	0.18
Database Platform Upgrade Phase II	254	1	0	1	0	Deploy	0.32	0.24	0.00	0.56
Identity and Access Management – 2017	250	1	0	1	0	Deploy	0.47	0.00	0.00	0.47
Application Testing Improvements	214	1	0	1	0	Deploy	0.42	0.00	0.18	0.61

⁵ NYISO determined that deferring the Marketplace and Webforms Technology Upgrade for another year was low risk and those resources could instead be applied to other market facing projects.

	Priority Scores Stake- Org Sector						Estimated Cost (in millions \$)				
Project	NYISO	holder		Org Count		Deliverable	Labor	Capital		Total	
Finance Products											
North Subzone Redistricting		CC	NTINUI	NG		System Design	0.22	0.00	0.00	0.22	
Rate Schedule 1 Technology Automation		CC	NTINUI	NG		Deploy	0.10	0.00	0.00	0.10	
Day Ahead Margin Assurance Payment (DAMAP) Enhancements		CC	NTINUI	NG		Deploy	0.06	0.00	0.00	0.06	
Transmission Service Charges Rate Update		CC	NTINUI	NG		Deploy	0.20	0.00	0.00	0.20	
Rate Schedule 12 Settlement	343	1	0	1	0	Functional Requirements	0.46	0.00	0.00	0.46	
CMS Projected True-up Exposure Study	265	24	43	4	3	Study	0.01	0.00	0.00	0.01	
Transactions Modifications & Confirmation Tool ⁵	263	6	9	2	1	Functional Requirements	0.09	0.00	0.00	0.09	
CMS/ ConInvoice Data Integration ⁶	263	1	0	1	0	Deploy	0.14	0.00	0.00	0.14	
Settlements Sub Accounts	229	120	39	7	2	System Design	0.07	0.00	0.00	0.07	
Settlement at Sub-hourly Metering - Study	214	10	0	2	0	Study	0.03	0.00	0.00	0.03	
Expense Reports Automation ⁷	211	1	0	1	0	Architecture Design	0.09	0.03	0.09	0.20	
Financial Reporting Tools ⁷	193	1	0	1	0	Deploy	0.09	0.03	0.00	0.11	
Contract Management	178	6	9	2	1	Architecture Design	0.12	0.05	0.15	0.32	
Sub Accounts with Unique Invoicing, Banking and Reporting	100	76	29	6	2	Deploy	0.82	0.00	0.00	0.82	

⁶ NYISO determined these projects could be deferred since workarounds are available and resources can be utilized on other projects

Red text identifies revisions from last presentation, **Bold** text indicates included in budget, Strikethrough indicates excluded from budget by York Independent System Operator, Inc. All Rights Reserved.

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⁷ NYISO increased the relative priority on these projects to provide new capabilities and increased efficiencies

		Priority Scores					Estimated Cost (in millions \$					
Project	NYISO	Stake-		Org	Sector Count			Capital	Prof.	Total		
Operations & Reliability Products												
TOA Platform Upgrade Phase II		CC	NTINUI	NG		Development Complete	0.23	0.00	0.66	0.89		
EMS BMS System Upgrade		CC	NTINUI	NG		Development Complete	4.33	1.20	8.92	14.45		
FERC Funded Rerun - Phase 4		CC	NTINUI	NG		Deploy	0.09	0.01	0.00	0.09		
2017 Reference Level Software Enhancements	377	11	17	3	1	System Design	0.23	0.00	0.10	0.33		
EPG PMU Simulator	365	13	8	3	1	Deploy	0.06	0.20	0.04	0.30		
PMU Enhancements	315	13	8	3	4	Deploy	0.13	0.00	0.50	0.63		
Gas Balancing Position Reporting	256	6	9	2	1	Deploy	0.03	0.00	0.00	0.03		
Smart Grid Visualization	223	19	8	4	1	Deploy	0.01	0.00	0.00	0.01		
SUEDE Front End Toolset	183	6	9	2	1	Deploy	0.26	0.00	0.00	0.26		

	Priority Scores				Estimated Cost (in millions \$					
Project	NVISO	Stake-		Org	Sector		Labor	Canital	Prof.	Total
Planning Products										
Solar Forecasting Initiatives	CONTINUING			Deploy	0.17	0.00	0.30	0.46		
Interconnection Process Review	258	435	470	24	5	Concept Proposed	0.20	0.00	0.00	0.20
Public Policy Transmission Planning Process Acceleration	232	417	273	21	5	Concept Proposed	0.10	0.00	0.00	0.10

	Priority Scores			Estimated Cost (in million			lions \$)			
Project		Stake-			Sector		Laban	0:4-1	Prof.	Tatal
Project	NYISO	nolaer	weight	Count	Count	Deliverable	Labor	<u> Capitai </u>	Serv.	Total
TCC Products										
TCC Balance-of-Period (TCC AMS, TCC AVS										
& CMS)		CO	NTINUII	NG		Deploy	0.53	0.01	0.43	0.96

Next Steps

- This project budget recommendation will be incorporated into the NYISO's overall budget proposal to be reviewed at the 9/12 BPWG meeting
- The NYISO will begin soliciting feedback on the 2017 project prioritization and budgeting process to help inform continuous improvement efforts

Appendix A: Stakeholder Advocacy

Organization	Advocacy Position
Richard P. Felak	The number and gravity of the proposed changes listed under capacity market products is clearly indicative of the long-established fact that the NYISO's capacity market is irretrievably broken, convoluted, inscrutable, inefficient, counterproductive, and beyond help with so many layers of band aids that it has terminal gangrene under them. You're continuing to waste your time and money and most importantly flushing money down the drain that instead should be directed for the benefit of your most important customers i.e., end use consumers and the only way to make improvements is by completely redoing the capacity market from the ground up starting with a clean sheet. Aren't you glad you asked huh
Saracen Energy East LP	Utilizing the graduated transmission curves as outlined in the tariff should eliminate all of the constraint relaxation and offline GT practices impairing energy prices. / / Modeling of all 100kV and above facilities will improve energy prices significantly and bring NYISO operations to a standard utilized by neighboring RTO's. It will better manage network issues caused by changes in our future generation fleet. It will lower production costs and improve price transparency.
NextEra Energy Power Marketing, LLC	These are all particularly important issues, notably on storage integration and interconnection process review. Thanks for seeking comments on this survey.
Citigroup Energy Inc.	I didn't see any FTR or NODAL Virtual projects listed
DC Energy LLC	There were no virtual energy product enhancement alternatives in this survey. Many stakeholders favor expanding virtual bidding points to include generation nodes, there had been stakeholder discussion on this subject but that was not included here. We recommend such advancement be included in the next survey.
AES ES Holdings, LLC	AES ES Holdings, LLC appreciates the opportunity participate in the survey. We allocated 100% of our points to Energy Storage and Optimization (vs. splitting between multiple storage and DER related projects) because we believe that improving in front of the meter storage project market integration is the most immediate focus priority to maximize the technical capability of in front of the meter storage projects to improve reliability, lower carbon and lower costs on the grid. Once the optimization question is addressed, other "sub topics" such as state of charge management and behind the meter storage/ DER can be detailed. In other words, if budget resources are limited, this project should be the first step before other related projects are launched.

Appendix A: Stakeholder Advocacy

Organization	Advocacy Position
Long Island Power Authority	> Transmission as reserve (excluded due to software update limitations) - impact should be studied before any software design can be done / > LI PAR Optimization - limit to changes within PAR tap change tolerance, including relative flows on parallel PARs / > Future consideration - measure and reduce systematic difference in DAM and RT gas burn (an effort that will be of increasing relevance as renewable penetration increases). / > For modeling key +100 kV constraints - do not require NYPA to change Niagara dispatch. /
CPower	CPower recommends that, in considering demand response projects for 2017, existing penalty provisions for SCRs be reviewed in conjunction with either the Distributed Energy Resource Program Design or the Limited Resource Performance Obligations proposed 2017 projects. Reviewing a more comprehensive set market rule changes applied to a given set of resources will result in greater market certainty for all stakeholders.
	Currently-implemented penalty calculations associated with, but not limited to, Incremental ACL, Provisional ACL, and RIP Portfolio shortfalls do not take into account the ICAP equivalent of UCAP offered, nor do they recognize actual event or test performance. Penalties are based solely upon the inability to demonstrate the enrolled Incremental or Provisional ACL. In many cases, these additional factors would eliminate the need for penalties. The addition of RIP shortfall penalties to individual SCR penalties results in overly punitive treatment of portfolios; consideration should be given to eliminating individual SCR penalties where possible. Minimum SCR kW thresholds for Change of Load/Change of Status (CoL/CoS) rules should be increased to better focus on larger resource performance; aggregate data reporting on the incidence of CoL/CoS violations would also be helpful. This effort would identify tariff and procedure changes needed to establish appropriate penalty calculation formulae.
	CPower recognizes that this initiative is not explicitly considered in the ongoing stakeholder prioritization of 2017 projects, but would like the project prioritization process record to indicate the importance of this effort to NY demand response providers. We appreciate the NYISO's consideration of this effort in 2017.
EnerNOC, Inc.	I understand that Dave Lawrence representing CPower reached out to you regarding considering existing penalty provisions for SCRs be reviewed in conjunction with either the Distributed Energy Resource Program Design or the Limited Resource Performance Obligations proposed 2017 projects. For all the reasons Dave provided, we fully support that. The penalty provisions are in serious need of reform and it was disappointing they weren't included in the survey.

Appendix A: Stakeholder Advocacy

Organization(s)	Advocacy Position
Energy Spectrum Inc.	Energy Spectrum recommends that, in considering demand response projects for 2017, existing penalty provisions for SCRs be reviewed in conjunction with either the Distributed Energy Resource Program Design or the Limited Resource Performance Obligations proposed 2017 projects. Reviewing a more comprehensive set market rule changes applied to a given set of resources will result in greater market certainty for all stakeholders.
	Currently-implemented penalty calculations associated with, but not limited to, Incremental ACL, Provisional ACL, and RIP Portfolio shortfalls do not take into account the ICAP equivalent of UCAP offered, nor do they recognize actual event or test performance. Penalties are based solely upon the inability to demonstrate the enrolled Incremental or Provisional ACL. In many cases, these additional factors would eliminate the need for penalties. The addition of RIP shortfall penalties to individual SCR penalties results in overly punitive treatment of portfolios; consideration should be given to eliminating individual SCR penalties where possible. Minimum SCR kW thresholds for Change of Load/Change of Status (CoL/CoS) rules should be increased to better focus on larger resource performance; aggregate data reporting on the incidence of CoL/CoS violations would also be helpful. This effort would identify tariff and procedure changes needed to establish appropriate penalty calculation formulae.
	Energy Spectrum recognizes that this initiative is not explicitly considered in the ongoing stakeholder prioritization of 2017 projects, but would like the project prioritization process record to indicate the importance of this effort to NY demand response providers. We appreciate the NYISO's consideration of this effort in 2017.
Alcoa, Inc., IBM Corporation, Occidental Chemical Corp., and Wegmans Food Markets	I do not like the description of the "Limited Resource Performance Obligations: Evaluate Minimum Performance Obligation for Capacity Resources." The NYISO needs to evaluate and improve its demand response programs, but I disagree that minimum performance requirements need to be increased, as assumed in the write-up. If anything, those requirements should be relaxed and made more flexible to enhance - rather than impede - participation in the programs.

The mission of the New York Independent System Operator, in collaboration with its stakeholders, is to serve the public interest and provide benefit to consumers by:

- Maintaining and enhancing regional reliability
- Operating open, fair and competitive wholesale electricity markets
- Planning the power system for the future
- Providing factual information to policy makers, stakeholders and investors in the power system

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