

New York TO Proposed Revisions to the Revised Interregional Coordination Agreement

Stakeholder Involvement

After reviewing the draft Amended and Restated Interregional Coordination and Seams Issue Resolution Agreement (“ICA”), the New York TOs have concluded that the involvement of market participants in the seams resolution process and the role of the Intermarket Coordination Group (“ICG”) are not adequately defined. The New York TOs request consideration of the following outline for market participant involvement in the seams process.

1. The Intermarket Coordination Group will participate in the regular quarterly seams meetings, along with the chairs and vice chairs of the appropriate ISO committees.
2. The ICG will meet with the Interregional Coordination Officers (ICOs) prior to the regular quarterly seams meetings when necessary to discuss and resolve seams issues.
3. The ICG will have access to the CEOs of the ISOs when it concludes that a seams related matter should be brought to the direct attention of the CEOs.
4. All preliminary decisions by the ISOs with respect to seams issues, including which seams issues to address, the priority among seams issues, and milestones, will be submitted to the ICG for review and comment prior to adoption.
5. The ICG will communicate regularly with the appropriate ISO stakeholder committees and seek input on seams issues from those committees.

6. When the resolution of a seams issue requires action by an ISO committee (*e.g.* revision of a manual or an ISO tariff), the normal ISO governance provisions will apply.
7. The ISO market participant committees in New York and New England will coordinate their actions on seams issues and may hold joint meetings to consider and resolve seams issues, when such joint meetings would be productive and efficient.

Attachment 1 Identified Seams Issues

We note that the list of Identified Seams Issues does not include all of the seams issues addressed in the current quarterly seams report. This may be because the ISOs are not yet prepared to provide firm milestones and completion dates for those seams issues. However, it is important that the list of Identified Seams Issues be complete. With respect to seams issues that may be in a preliminary stage of development, the ICA should establish a timeframe for the consideration, definition of scope, and prioritization of such issues. Even if it is eventually decided not to proceed with certain seams issues, it is important that they be considered, and decisions reached, within a specific timeframe.