

Ballard Spahr LLP

601 13th Street, NW
Suite 1000 South
Washington, DC 20005-3807
TEL 202.661.2200
FAX 202.661.2299
www.ballardspahr.com

Howard H. Shafferman
Direct: 202.661.2205
Fax: 202.626.9036
hhs@ballardspahr.com

November 4, 2011

By Hand Delivery

Mr. Brian Mills
Director, Permitting and Siting Office
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

US Department of Energy

NOV 04 2011

**Electricity Delivery and
Energy Reliability**

Re: Comments of New York Independent System Operator, Inc.

Dear Mr. Mills:

Enclosed please find fifteen copies of the "Comments of New York Independent System Operator, Inc." for filing in Docket No. PP-230-4.

Please date-stamp the extra copy of the petition and return it to the messenger making this filing. Please contact the undersigned if you have any questions concerning this matter.

Very truly yours,



Howard H. Shafferman

cc: Parties to Docket No. PP-230-4

Enclosure

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY**

**International Transmission Company
d/b/a ITC*Transmission***

)
)
)
)

Docket No. PP-230-4

COMMENTS OF NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.

The New York Independent System Operator, Inc. ("NYISO") submits these comments in the above-captioned proceeding. On August 17, 2011, the NYISO filed a Motion to Intervene and Request for Comment Period (the "NYISO Motion"). The NYISO appreciates the comment period granted by the Department.

COMMENTS

A. Operating Rules

The NYISO Motion expressed concerns that proposed rules developed by International Transmission Company d/b/a ITC*Transmission* ("ITC"), the Midwest Independent Transmission System Operator, Inc. ("MISO") and the Independent Electricity System Operator of Ontario ("IESO") for operating the Phase Angle Regulators ("PARs") at the Ontario/Michigan interface could adversely affect the reliability of transmission service in New York.

The NYISO's reliability concerns related to the modeling of the PARs in the NERC Interchange Distribution Calculator ("IDC") have been addressed by the additional explanation of how the PARs at the Ontario/Michigan interface will be operated, and the explanation of the intended meaning of the term "Max Tap," contained in the Joint Comments of the MISO and the


IESO Answering Petition To Intervene and Request for a Comment Period of NYISO, filed in this proceeding on October 12, 2011.

B. Settlement Agreement

The NYISO has received a service copy of a settlement agreement filed today in this proceeding by ITC, MISO, PJM Interconnection, L.L.C. ("PJM") and others (the "Settlement Agreement").

Paragraph 2 of the Settlement Agreement refers to a data collection arrangement among MISO and PJM (with IESO intending to submit comparable data) reflected in a Letter Agreement that is Attachment 1 to the Settlement Agreement. The NYISO is currently working with MISO, ITC and PJM to consider whether, and on what terms, NYISO is willing to participate in the data collection arrangement.

Respectfully submitted,


Alex M. Schnell
New York Independent System Operator, Inc.


Howard H. Shafferman
Ballard Spahr LLP

Dated: November 4, 2011

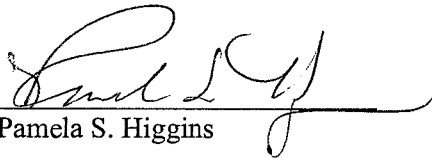
**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY**

International Transmission Company
d/b/a ITC*Transmission*

)
)
)
)

Docket No. PP-230-4

I hereby certify that I have this day caused a copy of the foregoing document to be served on the parties on the attached service list.


Pamela S. Higgins

SERVICE LIST

Gary J. Newell
Rebecca L. Sterzinar
Thompson Coburn LLP
1909 K St., NW, Suite 600
Washington, DC 20006
Counsel to American Municipal Power, Inc.

Glen L. Ortman
Adrienne E. Clair
Stinson Morrison Hecker LLP
1150 18th St., NW, Suite 800
Washington, D.C. 20036
*Counsel to Old Dominion Electric
Cooperative*

Gregory A. Troxell
Assistant General Counsel
Midwest Independent Transmission System
Operator, Inc. .
720 City Center Drive
Carmel, IN 46032

Ricardo T. Gonzales
Vice President - Operations
New York Independent System Operator,
Inc.
10 Krey Blvd.
Rensselaer, NY 12144

Nicholas Ingman
Manager, Regulatory Affairs
Ontario's Independent Electricity System
Operator
655 Bay St., Suite 410
Toronto, Ontario, Canada
M5G2K4

Craig Glazer
Vice President, Federal Government Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W.
Suite 600
Washington, D.C. 20005

Barry S. Spector
Wright & Talisman, P.c.
1200 G Street, N.W.
Suite 600
Washington, D.C. 20005

Pauline Foley
Assistant General Counsel
PJM Interconnection, L.L.C.
955 Jefferson Ave.
Norristown, P A 19403

Amy L. Blauman
Assistant General Counsel
Pepco Holdings, Inc.
70 I Ninth Street, NW, Suite 1100
Washington, DC 20068

David E. Goroff
Nicole S. Allen
Bruder, Gentile & Marcoux, L.L.P.
170 I Pennsylvania Ave., NW, Suite 900
Washington, DC 20006-5807
Counsel for the PHI Companies

J. Andrew Dodge
Vice President, Transmission
Operations & Planning
Baltimore Gas and Electric Company
7309 Windsor Mill Road
Baltimore, MD 21244

Gary E. Guy
BGE - Chief FERC Counsel
Baltimore Gas and Electric Company
2 Center Plaza, Suite 130 I
110 West Fayette Street
Baltimore, MD 21201

Monique Rowtham-Kennedy
American Electric Power Service
Corporation
801 Pennsylvania Ave., NW, Suite 320
Washington, DC 20004-2684

James R. Bacha
American Electric Power Service
Corporation
One Riverside Plaza
Columbus, OH 43215

Daniel L. Snider
American Electric Power Service
Corporation
One Riverside Plaza
Columbus, OH 43215

Elias G. Farrah
Nina H. Jenkins-Johnston
Dewey & LeBoeuf LLP
1101 New York Ave., NW
Washington, DC 20005-4213

Paul L. Gioia
Dewey & LeBoeuf LLP
One Commerce Plaza, Suite 2020
99 Washington Ave.
Suite 2020
Albany, NY 12210-2820

John Borchert
Manager of Electric Engineering Services
Central Hudson Gas & Electric Corporation
284 South Avenue
Poughkeepsie, NY 12601

Neil H. Butterklee, Esq.
Assistant General Counsel
Consolidated Edison Co. of New York, Inc.
4 Irving Place
Room 1815-s
New York, NY 10003

Stuart Nachmias
Vice President, Energy Policy & Regulatory
Affairs
Consolidated Edison Co. of New York, Inc.
4 Irving Place
Room 1138
New York, NY 10003

Joseph Nelson, Esq.
Van Ness Feldman, P.C.
1050 Thomas Jefferson Street, NW
1st Floor
Washington, DC 20007
Counsel/or Long Island Power Authority

Jacqueline Hardy
Assistant General Counsel
Long Island Power Authority
333 Earle Ovington Boulevard
Suite 403
Uniondale, NY 11553

Andrew Neuman, Esq.
New York Power Authority
123 Main Street
White Plains, NY 10601-3170

William Palazzo, Manager-NYISO Market
Policy
New York Power Authority
123 Main Street
White Plains, NY 10601-3170

Catherine P. McCarthy, Esq.
Dewey & LeBoeuf LLP
1101 New York Ave., NW
Washington, DC 20005-4213

R. Scott Mahoney, Esq.
New York State Electric & Gas Corporation
Durham Hall, 52 Farm View Drive
New Gloucester, ME 04260

Roxane E. Maywalt, Esq.
National Grid USA Service Company, Inc.
40 Sylvan Road
Waltham, MA 02451-1120

Bart Franey
Director of Federal Regulation
Niagra Mohawk Power Corporation d/b/a
National Grid
300 Erie Boulevard West
Syracuse, NY 13202

Randall B. Palmer
Senior Corporate Counsel II
FirstEnergy Corp.
800 Cabin Hill Drive
Greensburg, P A 15601-1689

G. Phillip Nowak
Elisabeth S. Walden
Akin Gump Strauss Hauer & Feld LLP
1333 New Hampshire Ave., NW
Washington, DC 20036-1564
Counsel to First Energy Service Company

Daniel Shields
Federal Energy Advocate
Public Utilities Commission of Ohio
180 East Broad Street, 3rd Floor
Columbus, OH 43215-3793

Thomas W. McNamee
Assistant Attorney General
Public Utilities Section
180 East Broad Street, 6th Floor
Columbus, OH 43215-3793

John R. Staffier
Stuntz, Davis and Staffier, P.C.
555 Twelfth Street, N.W.
Suite 630
Washington, D.C. 20004