

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

New York Independent System Operator, Inc.) New York Transmission Owners))	Docket Nos. ER04-449-007 ER04-449-008 ER04-449-016
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**JOINT REQUEST FOR A 14-DAY EXTENSION OF TIME
AND REQUEST FOR EXPEDITED ACTION OF
THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.
AND THE NEW YORK TRANSMISSION OWNERS**

In accordance with Rule 2008 of the Commission’s Rules of Practice and Procedure,¹ the New York Independent System Operator, Inc. (“NYISO”) and the New York Transmission Owners (“NYTOs”) (together “the Joint Filing Parties”) respectfully request a 14-day extension of time, *i.e.*, until August 4, 2008, to submit revised tariff sheets in compliance with the Commission’s March 21, 2008 order in the above-captioned proceedings (“*Guidance Order*”).² The Joint Filing Parties were previously granted an extension until July 21, 2008 to file the required tariff revisions. The Joint Filing Parties have worked diligently, and have made significant progress, during this time. They now seek a brief additional extension in order to maximize the chances of reaching consensus on the remaining open implementation issues and finalize the numerous and detailed tariff amendments that will be included in their filing.

I. BACKGROUND

This Joint Filing Parties’ developed a conceptual framework regarding the implementation of a second level of interconnection service that would include a deliverability component (“Deliverability Plan”) and, with the support of most NYISO stakeholders, filed it in

¹ 18 C.F.R. § 385.2008 (2008),

² *New York Independent System Operator, Inc., New York Transmission Owners, et al.*, 122 FERC ¶ 61,267 (2008).

October, 2007. In the *Guidance Order*, the Commission directed the Joint Filing Parties to submit tariff revisions by May 20, 2008 that would “implement the Deliverability Plan and address in sufficient detail certain remaining issues raised by parties”

On May 15, 2008, the Joint Filing Parties requested an extension until July 21, 2008 to comply with the *Guidance Order*. The Joint Filing Parties explained that the extension was necessary to address complex implementation issues and to complete substantial revisions to numerous tariff sheets. They also stated that an extension would permit them to continue to work with all NYISO stakeholders to resolve outstanding issues. The Commission granted the requested extension on May 19, 2008.

II. JOINT REQUEST FOR EXTENSION OF TIME

The Joint Filing Parties respectfully request an additional 14-days, until August 4, 2008, to submit revised tariff sheets in compliance with the *Guidance Order*. The Joint Filing Parties submit that there is good cause to grant the requested extension, as discussed below.

The Joint Filing Parties have worked collaboratively with the other NYISO stakeholders to comply with the *Guidance Order*. Much of the necessary drafting and review is complete but a number of points remain to be finalized. Several hundred tariff sheets are implicated by the Deliverability Plan, including portions of Attachments S, X, Y, and Z of the NYISO’s Open Access Transmission Tariff and Article 5 of the NYISO’s Market Administration and Control Area Services Tariff. All of the proposed amendments must be accurate and internally consistent. The Joint Filing Parties must also ensure that that any changes that they make in the final stages of the effort are properly reflected throughout the entire set of revisions. A brief

extension will allow the Joint Filing Parties to bring this complex effort to a successful conclusion without prejudicing the interests of any other party.³

Therefore, the Joint Filing Parties respectfully request that the Commission grant a 14-day extension, until August 4, 2008, to submit revised tariff sheets in compliance with the *Guidance Order*.

III. REQUEST FOR EXPEDITED ACTION

The Joint Filing Parties respectfully request that the Commission act expeditiously on this request, and grant the requested extension by July 18, 2008, so that the Joint Filing Parties can plan their continuing work with stakeholders, and schedule additional meetings, in an orderly fashion.

³ As the Joint Filing Parties stated in their May 15, 2008 extension request in these dockets, they seek to avoid any delay to the anticipated schedule of the Class Year 2007 study, which consists of eleven wind projects. The Class Year 2007 study, which has been performed to identify the upgrades needed to comply with the current NYISO Minimum Interconnection Standard, is complete, and is scheduled for review and approval by the NYISO's Operating Committee on July 17, 2008. Once the Commission acts on the tariff revisions to be filed by the Joint Filing Parties in this proceeding, the NYISO intends to complete a deliverability analysis for Class Year 2007. To implement this, the tariff sheets proposed will include a one-time transition process for applying the deliverability analysis applicable to projects in Class Year 2007. The Interconnection Agreements for Class Year 2007 will explicitly condition participation in the Installed Capacity market on satisfaction of the new deliverability interconnection standard and, to the extent a project is found to be not deliverable, on funding, or committing to fund, any required deliverability upgrades. Meanwhile, the non-deliverability portions of Class Year 2008 can continue in parallel with the deliverability analysis of Class Year 2007.

IV. CONCLUSION

For the reasons set forth herein, the New York Independent System Operator, Inc. and the New York Transmission Owners respectfully request an extension of time, until August 4, 2008, to submit revised tariff sheets in compliance with the *Guidance Order*.

Respectfully Submitted,

/s/ Elias G. Farrah

Elias G. Farrah
Julia E. Richardson
Dewey & LeBoeuf LLP
1101 New York Avenue, NW
Suite 1100
Washington, DC 2005-4213
efarrah@dl.com
jrichardson@dl.com

Paul L. Gioia
Dewey & LeBoeuf LLP
One Commerce Plaza
99 Washington Avenue
Suite 2020
Albany, NY 12210-2820
pgioia@dl.com

Counsel to the New York Transmission Owners

/s/ Ted J. Murphy

Robert E. Fernandez, General Counsel
Karen Georgenson Gach, Senior Attorney
Elaine D. Robinson, Director of Regulatory Affairs
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
Tel: (518) 356-6000
Fax: (518) 356-4702
rfernandez@nyiso.com
kgach@nyiso.com
erobinson@nyiso.com

Ted J. Murphy
Hunton & Williams LLP
1900 K Street, NW
Suite 1200
Washington, DC 2006-1109
Tel: (202) 955-1500
Fax: (202) 778-2201
tmurphy@hunton.com

J. Kennerly Davis
Hunton & Williams LLP
951 East Byrd Street
Richmond, VA 23219
Tel: (804) 788-8559
Fax: (804) 778-8218

Counsel to the New York Independent System Operator, Inc.

Central Hudson Gas & Electric Corporation
Donald K. Dankner, Esq.
Raymond B. Wuslich, Esq.
Winston & Strawn LLP
1700 K Street, NW
Washington, DC 20006
ddankner@winston.com
rwuslich@winston.com

Long Island Power Authority
Joseph Nelson, Esq.
Van Ness Feldman, P.C.
1050 Thomas Jefferson Street, NW
7th Floor
Washington, DC 20007
JBN@vnf.com

Roni F. Epstein, Esq.
Long Island Power Authority
333 Earle Ovington Boulevard
Suite 403
Uniondale, NY 11553
repstein@lipower.org

Niagara Mohawk Power Corporation
d/b/a/ National Grid
Roxane E. Maywalt, Esq.
National Grid USA Service Company, Inc.
300 Erie Boulevard - West
Syracuse, NY 13202-4250
Roxane.maywalt@us.ngrid.com

Consolidated Edison Company of New York, Inc.
Orange and Rockland Utilities, Inc.
Neil H. Butterklee, Esq.
Consolidated Edison Co. of New York, Inc.
4 Irving Place
Room 1815-s
New York, NY 10003
butterkleen@coned.com

New York Power Authority
Sarah Barish-Straus, Esq.
Carlos E. Gutierrez, Esq.
New York Power Authority
123 Main Street
White Plains, NY 10601-3170
sarah.barish-straus@nypa.gov
carlos.gutierrez@nypa.gov

New York State Electric & Gas Corporation
Rochester Gas and Electric Corporation
Catherine P. McCarthy, Esq.
Dewey & LeBoeuf LLP
1101 New York Avenue, NW
Suite 1100
Washington, DC 2005-4213
Catherine.mccarthy@dl.com

CERTIFICATE OF SERVICE

I hereby certify that I have electronically served the foregoing document upon all parties on the official service list compiled by the Secretary in this proceeding, in accordance with 18 C.F.R. § 385.2010 (2008).

Dated at Washington, DC, this 15th day of July, 2008.

/s/ Catherine A. Karimi
Sr. Professional Assistant
Hunton & Williams LLP
1900 K Street, NW
Washington, DC 20006

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