



1900 K STREET, N.W.
WASHINGTON, D.C. 20006-1109

TEL 202 • 955 • 1500
FAX 202 • 778 • 2201

ARNOLD H. QUINT
Direct Dial: 202-955-1542
EMAIL: AQUINT@HUNTON.COM

File No: 554320.000044

December 30, 2002

ELECTRONIC FILING

Ms. Norma McOmber
Federal Energy Regulatory Commission
888 First Street, N.E., Room 82-37
Washington, DC 20426

Request to Speak of the New York Independent System Operator, Inc.
at the Commission's January 21, 2003 Technical Conference
in Docket Nos. RM01-12-000, RM02-1-000, and RM02-12-000

Dear Ms. McOmber:

Pursuant to the Notices issued on December 3 and 17, 2002 in the above-captioned proceedings, the New York Independent System Operator ("NYISO") hereby respectfully requests that Mr. John P. Buechler, its Executive Regulatory Policy Advisor, be permitted to speak at the January 21 Technical Conference on interconnection queuing.

The list of "Possible Topics for Discussion" attached to the December 17 Notice includes a number of items that are of great interest to the NYISO. The NYISO believes that it has a valuable perspective to offer on these issues because it administers an established interconnection queue within the framework of a market design that is very similar to the one proposed in the Commission's Notice of Proposed Rulemaking in Docket No. RM01-12-000. The NYISO also has special queuing rules, which reflect New York State's generator siting laws and highly congested electrical topography, and may be of interest to the Commission.

The NYISO has had a Commission-approved cost allocation process in place for the past year which includes a queuing process for the purpose of cost allocation that is based upon a project's having achieved certain milestones--both within the NYISO's planning procedures as well as under New York State siting regulations. This procedure, which determines the cost allocation for interconnecting generation and merchant transmission projects annually on a "class year" basis, is an effective means for an equitable distribution of system upgrade costs between



Ms. Norma McOmber
December 30, 2002
Page 2

and among transmission owners and interconnecting project developers. The NYISO proposes to outline this process in the context of the Commission's discussion items for the Technical Conference.

Mr. Buechler can be contacted regarding this request at the address provided below:

Mr. John P. Buechler
Executive Regulatory Policy Advisor
New York Independent System Operator, Inc.
3890 Carmen Road
Schenectady, NY 12303
Tel: 518-356-6153
Fax: 518-356-7570
jbuechler@nyiso.com

Respectfully submitted,

/s/ Arnold H. Quint
Arnold H. Quint
Counsel for
New York Independent System Operator, Inc.

Arnold H. Quint, Esq.
Ted J. Murphy, Esq.
Hunton & Williams
1900 K Street, NW
Washington, DC 20006-1109
(202) 955-1500