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May 31, 2000

By Hand

The Honorable David P. Boergers, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

New York Independent System Operator, Inc.
Revisions to Independent System Operator Agreement

Dear Mr. Boergers:

Pursuant to Sections 205 and 206 of the Federal Power Act, the New York Independent System Operator, Inc. ("NYISO"), by counsel, hereby files amendments to the Independent System Operator Agreement ("ISO Agreement").¹

List of Documents Submitted

The NYISO submits the following documents:

1. this filing letter;
2. amendments to the ISO Agreement together with a clean copy of the ISO Agreement (Attachment I); and
3. a form of *Federal Register* Notice (Attachment II).

Copies of Correspondence

¹ Section 19.01 of the ISO Agreement appears to require a filing under Section 206 of the Federal Power Act whenever any amendment to the governance provisions of the ISO Agreement are proposed, even if, as here, the amendment has been approved by the Board of Directors of the NYISO and unanimously by the NYISO's Management Committee. The Management Committee consists of each Party to the ISO Agreement. The amendment proposed here modifies the specific governance provisions of the ISO Agreement that are listed as requiring a filing under Section 206.

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Copies of correspondence concerning this filing should be served on:

Robert E. Fernandez, Esquire General Counsel John P. Buechler Director of Regulatory Affairs New York Independent System Operator, Inc. 3890 Carman Road Schenectady, NY 12303	Arnold H. Quint Hunton & Williams 1900 K Street, NW Suite 1200 Washington, DC 20006
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Proposed Effective Date

The NYISO proposes to make this filing effective on April 19, 2000. Waiver of the Commission's notice requirements is appropriate in that that is the date the amendments were approved by the Board of Directors. Moreover, the amendments should be effective from that date to permit the change in voting shares to be reflected as of that date.

Names and Addresses of Persons to Whom a Copy of the Amendment Has Been Mailed

A copy of the amendments are being mailed to all signatories to the ISO Agreement.

Brief Description of the Amendment

For the reasons described in the next section hereof, the NYISO is making changes to the ISO Agreement.

Statement of the Reasons for the Rate Schedule Change

The amendments create a separate "Large Energy Using Governmental Agency" subsector within the End-Use Consumer Sector and an adjustment of voting shares among the subsectors to accommodate the new subsector.

Satisfaction of Sections 205 and 206

Although Section 19.01 of the ISO Agreement appears to require that the amendments to the ISO Agreement be filed under Section 206 of the Federal Power Act, the NYISO assumes that requirement relates to burden of proof. The NYISO submits that the amendment meets that burden. The amendment was approved both by the NYISO Board of Directors and by a unanimous vote of the Management Committee.

In the circumstances, and especially in light of the unanimous approval by the Management Committee, the Commission should treat the filing herein as if it were made under Section 205 and

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approve it without a hearing. The NYISO has complied with all the Section 205 filing requirements and requests any waivers necessary to make this filing effective on April 19, 2000.

Requisite Agreement

The amendments to the ISO Agreement have been approved by the NYISO's Board of Directors and unanimously by the NYISO's Management Committee.

No Costs Relating to Discriminatory Employment Practices

The NYISO has no expenses or costs that have been alleged or judged to be illegal, duplicate, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

Federal Register Notice

A form of *Federal Register* Notice is provided as Attachment II hereto. A diskette of the notice is also provided in WordPerfect format.

Respectfully submitted,

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

cc: Signatories to the ISO Agreement

Amendments
to the ISO Agreement

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

New York Independent System Operator, Inc.) Docket No. _____

NOTICE OF FILING

Take notice that on May 31, 2000, the New York Independent System Operator, Inc. (“NYISO”) filed amendments to the ISO Agreement. The NYISO requests an effective date of April 19, 2000 and waiver of the Commission’s notice requirements.

A copy of this filing was served upon all persons who have signed the ISO Agreement and on the electric utility regulatory agencies in New York, New Jersey and Pennsylvania.

Any person desiring to be heard or to protest this filing should file a motion to intervene or protest with the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426, in accordance with Rules 211 and 214 of the Commission’s Rules of Practice and Procedure 385.211 and 385.214). All such motions or protests should be filed on or before _____. Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a motion to intervene. Copies of this application are on file with the Commission and are available for public inspection.

David P. Boergers
Secretary