

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

<b>New York Independent System</b>	)	<b>Docket Nos. ER04-449-003, ER04-449-007</b>
<b>Operator, Inc.</b>	)	<b>and ER04-449-008</b>

**MOTION FOR EXTENSION OF DELIVERABILITY WORK PLAN SCHEDULE  
OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008 (2005), the New York Independent System Operator, Inc. (“NYISO”), respectfully requests an additional three months for submission of two documents included on the Work Plan Schedule in this proceeding. The NYISO is collaborating with the Market Participants (“MP”) under the Work Plan to study and address implementation of a second level of interconnection service on the New York bulk transmission system to provide for deliverability of generation output to customers. Specifically, the NYISO respectfully requests permission to extend the deadline for submitting its Final Study Report from December 1, 2006 to March 3, 2006 and to extend the date for submission of its deliverability compliance filing from February 6, 2006 to May 6, 2006. This motion accompanies the Third Status Report that is being timely filed by the NYISO in this proceedings. The extension requested in this Motion has been agreed to by New York Market Participants.

## I. COMMUNICATIONS

The NYISO respectfully requests that communications regarding this proceeding should be addressed to:

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## II. STATEMENT OF ISSUES

In compliance with Order No. 663,<sup>1</sup> the NYISO respectfully states that the only issue raised in this motion is the need for an extension of time to complete the deliverability Final Study Report and compliance filing in the above-captioned proceedings.

## III. MOTION FOR EXTENSION OF TIME

### A. Background

On August 6, 2004 the Commission issued its *Order Conditionally Accepting Large Generator Interconnection Procedures and Large Generator Interconnection Agreement* (“August 6 Order”).<sup>2</sup> In the August 6 Order, the Commission accepted the single level of interconnection service proposed by the Joint Filing Parties but noted that “requiring a level of

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<sup>1</sup> *Revision of Rules of Practice and Procedure Regarding Issue Identification*, 112 FERC ¶ 61,297 (2005).

<sup>2</sup> *New York Independent System Operator, Inc. and New York Transmission Owners*, 108 FERC ¶ 61,159 (2004).

interconnection service that incorporates a deliverability requirement remains a goal of the Commission.” The Commission noted that the NYISO had already initiated a stakeholder process to examine how and to what extent the NYISO OATT should offer a second level of interconnection service incorporating a deliverability requirement, and granted the Joint Filing Parties’ request for additional time to continue the stakeholder discussions.

On February 7, 2005, the NYISO and some of the NYTOs submitted a “Compliance Filing and Request for Extension of Time” in which the NYISO reported on its preliminary deliverability analysis and requested additional time for further refinement of the models, assumptions, and methodology utilized in its initial study. A number of NYISO stakeholders submitted interventions, comments, and protests—but all parties endorsed the request for additional time. On February 28, 2005, the NYISO and all of the NYTOs submitted a “Joint Statement” in which they proposed a schedule for the continuation of stakeholder discussions. On April 29, 2005, the NYISO submitted the Work Plan.

In an order issued on June 2, 2005, the Commission denied various requests for rehearing and directed that work on the deliverability issues continue in the NYISO’s stakeholder process.<sup>3</sup> The Commission declined to prejudge the outcome of the stakeholders’ efforts, noting that each independent system operator faces unique challenges requiring unique solutions, and approved as reasonable the NYISO’s Work Plan.

The NYISO continued to collaborate with the MPs at the IITF throughout the spring and summer of 2005, and filed a status report on July 1, 2005. Discussions to date have focused on the methodology to be used to recognize the probabilistic nature of

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<sup>3</sup> *New York Independent System Operator, Inc. and New York Transmission Owners*, 111 FERC ¶ 61,347 (2005) (“June 2 Order”).

generator forced outage rates. In its October 1, 2005 Status Report, the NYISO reported that it had analyzed the base case and the planning case to assess potential generation deliverability problems under four alternative deliverability assessment methodologies. The NYISO stated that it would narrow the scope of its deliverability analysis to one, or at most, two of these methodologies, in its Final Study Report.

**B. Additional Time is Required to Complete the Deliverability Study Report In Accordance with the Methodologies, Scenarios and Sensitivity Analyses Requested by the Market Participants**

In recent meetings and comments, the MPs have stated that they do not want the NYISO Staff to narrow the scope of the deliverability study at this time. The Market Participants have requested that the NYISO conduct its final deliverability analysis using five distinct methodologies and sensitivity analyses for two of the five methodologies, described in the December 1, 2005 Status Report filed herewith. In addition, the MPs have asked the NYISO to analyze three specific scenarios set forth in the Study Assumptions. Finally, the MPs have requested additional explanation and discussion of the NYISO's base case and study assumptions. Some of the analyses have been under review, but are not completed, while others are new requests. The NYISO is certainly willing to accommodate all of the analyses desired by the Market Participants. In order to do so, however, the NYISO estimates it will need an additional three months (December, January and February) to complete the study, draft the Final Study Report, review the draft report with the Market Participants and provide for their written comments. Accordingly, the proposed Revised Work Plan calls for the Final Study Report to be submitted to the Commission along with another status report on March 3, 2005. During March and April 2006, the NYISO will prepare a compliance filing addressing a second level of deliverable interconnection service on the New York bulk power system with the Market

Participants' input. Thus, the Revised Work Plan will require the NYISO to submit its compliance filing to the Commission on May 6, 2006.

The Commission previously granted additional time for the NYISO and MPs to respond to its direction, and that time has been well used. As the Commission stated in its Order Denying Rehearing and Granting Request for Clarification in this proceeding:

[t]he NYISO is a distinctive region and New York's stakeholders should have the flexibility to craft a system appropriate to its specific needs. The Commission recognized this fact when it agreed to provide the stakeholders additional time to work on developing a second level of interconnection service.<sup>4</sup>

The Market Participants attending the November 15, 2005 meeting of the Interconnection Issues Task Force agreed to extending the Work Plan by an additional three months. Granting this additional time to complete the multi-faceted study called for will also allow a much more thorough Final Study Report and a superior compliance filing than would otherwise be possible in the time provided.

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<sup>4</sup> New York Independent System Operator, Order Denying Rehearing and Granting Request for Clarification, 111 F.E.R.C. ¶ 61,347 (June 2, 2005).

**V. CONCLUSION**

WHEREFORE, in view of the foregoing, the NYISO respectfully requests that the Commission grant the extension of deliverability Work Plan schedule requested herein.

Respectfully submitted,

NEW YORK INDEPENDENT  
SYSTEM OPERATOR, INC.

*/s/ Carl F. Patka*\_\_\_\_\_

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November 30, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day caused this Motion for Extension of Deliverability Work Plan Schedule to be served upon each party on the official service list compiled by the Secretary. I have also caused to be served electronically a copy of this filing on the official representative of each of its customers, on each participant in its stakeholder committees, and caused paper copies of this filing to be served on the New York State Public Service Commission, and on the electric utility regulatory agencies of New Jersey and Pennsylvania.

Dated at Albany, New York this 30th day of November, 2005.

*/s/ Carl F. Patka* \_\_\_\_\_  
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