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FILE NO: 55430.000044

September 13, 2002

**HAND DELIVERY**

The Honorable Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Errata of  
New York Independent System Operator, Inc.  
in Docket No. EL02-125-000**

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Dear Ms. Salas:

On September 12, 2002, the New York Independent System Operator, Inc. ("NYISO") filed a Motion for Extension of Time to File Answer. The caption on the motion was erroneously listed as Docket No. EL02-102-000. The motion, instead, should have been filed in Docket No. EL02-125-000.

A revised motion with the corrected docket number is attached hereto. We apologize for any inconvenience this may have caused.

This letter and the correction motion are being served on the service list in Docket No. EL02-125-000.

Respectfully submitted,

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

The Honorable Magalie R. Salas, Secretary

September 13, 2002

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cc: Daniel L. Larcamp, Director Office of Markets, Tariffs and Rates, Room 8A-01,  
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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

<b>KeySpan Energy Development Corporation,</b>	)	<b>Docket No. EL02-125-000</b>
<b>KeySpan-Ravenswood, LLC, New York Power</b>	)	
<b>Authority, Electric Power Supply Association</b>	)	
<b>and Independent Power Producers of New York, Inc.,</b>	)	
<b>Complainants,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>New York Independent System Operator, Inc.,</b>	)	
<b>Respondent</b>	)	

**MOTION OF  
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.  
FOR EXTENSION OF TIME TO FILE ANSWER**

Pursuant to Rules 212 and 2008 of the Commission’s Rules of Practice and Procedure,<sup>1</sup> the New York Independent System Operator, Inc. (“NYISO”) hereby respectfully requests an extension of time, until September 24, 2002, to submit its answer to the complaint (“Complaint”) filed on August 28, 2002, by KeySpan Energy Development Corporation and other parties (“Complainants”) in the above-captioned proceeding.

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<sup>1</sup> 18 C.F.R. §§ 385.212 and 385.2008 (2001).

## Communications

Communications concerning this Docket should be directed to the following persons, and their names should be placed on the official services list:

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## Motion for Extension of Time

The Complaint objects to the allocation by the NYISO of approximately \$80 million of interconnection facility costs among New York transmission owners and competitive power project developers. In New York, interconnection facility costs are allocated using a comprehensive set of technical criteria and other rules contained in Attachment S of the NYISO Open Access Transmission Tariff.

The record associated with the disputed cost allocation is extensive. The technical and tariff-related issues raised by the Complaint are significant and complex. The relief requested by

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<sup>2</sup> The NYISO respectfully requests a waiver of 18 CFR § 385.203(b)(3) to permit service on these counsel in both Washington, D.C. and Richmond, Virginia.

the Complainants could have far-reaching consequences for the development of competitive power markets in New York. Moreover, the Complaint raises issues of first impression before the Commission, and thus the Commission will benefit from a full exposition of all the issues.

The NYISO has been working diligently to prepare its answer (“Answer”) to the Complaint, and much has been done. Even so, the NYISO has concluded that a limited amount of additional time is required to ensure that the Answer filed fully and effectively contributes to a record that will help the Commission resolve the significant and complex issues raised in this proceeding.

Conclusion

WHEREFORE, for the foregoing reasons, the New York Independent System Operator, Inc. respectfully requests that the Commission grant its request for a one-week extension of time, until September 24, 2002, to submit its Answer in the above-captioned proceeding.

Respectfully submitted,

By \_\_\_\_\_  
Counsel

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September 13, 2002

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served upon each person on the official service list for this Docket, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 CFR § 2010 (2002).

Dated at Washington, D.C. this 13th day of September , 2002.

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