



290 Washington Avenue Extension, Albany, New York 12203

April 29, 2005

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FEDERAL ENERGY  
REGULATORY COMMISSION

**BY HAND**

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

Re: *New York Independent System Operator, Inc.*  
Docket No. ER04-449-006  
Informational Filing of Work Plan for Deliverability Analysis

Dear Ms. Salas:

On February 7, 2005, the New York Independent System Operator, Inc. ("NYISO"), Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York Power Authority, New York State Electric & Gas Corporation, Orange & Rockland Utilities, Inc., and Rochester Gas and Electric Corporation (collectively, the "Joint Filing Parties") submitted a "Compliance Filing and Request for Extension of Time" in the above-captioned proceeding.<sup>1</sup> The Joint Filing Parties requested additional time to permit further refinement of the models, assumptions, and methodology utilized in the NYISO stakeholders' preliminary analyses of deliverability issues in New York. LIPA and Niagara Mohawk Power Corporation, a National Grid Company ("Niagara Mohawk"), also submitted a joint "Compliance Filing and Request for Further Extension of Time."<sup>2</sup> Both filings supported the need for an extension of time through February 6, 2006 to complete additional analysis of deliverability issues through a continuation of the stakeholder process.

On February 11, 2005, the Commission issued a Notice of Filing relating to both compliance filings and requested comments by interested parties. A number of other NYISO stakeholders submitted interventions, comments, and protests of the compliance filings. However, all of these parties endorsed the request for time to complete the additional analysis.

<sup>1</sup> The February 7 filing was made in response to the Commission's August 6, 2004 Order in Docket No. ER04-449-000, *New York Independent System Operator, Inc., et al.*, 108 FERC ¶ 61,159 (2004), *reh'g pending*.

<sup>2</sup> Docket No. ER04-449, *Compliance Filing and Further Request for an Extension of Time of LIPA and Niagara Mohawk Power Corporation* (February 7, 2005).

NYISO-DC Field  
3990 Capital Road  
Silverdale, NY 12152

NYISO-Wolf Road  
167 Wolf Road  
Albany, NY 12203

NYISO-Albany  
172 Western Turnpike  
Albany, NY 12203


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The NYISO and the New York Transmission Owners, including LIPA and Niagara Mohawk, submitted a filing on February 28, 2005<sup>3</sup> requesting that the Commission adopt a proposed schedule for the continuation of the stakeholder discussions on deliverability issues. The proposed schedule called for the NYISO to submit an "Informational Filing" of its Work Plan for the additional analysis to the Commission by May 1, 2005. Since that time, the NYISO has proposed and reviewed a Work Plan with its stakeholders. Although the Commission has not yet acted on the February 28 request, the NYISO submits the Work Plan with this filing. A copy of the Work Plan is included as Attachment I.

The NYISO's Work Plan contemplates a total of four months of time for development of the study methodologies and stakeholder review of interim study results. The schedule calls for the circulation of the NYISO's final report to stakeholders in the fall of 2005, with time for additional discussion and revision before the submission of a compliance filing on February 6, 2006. In accordance with the February 28, 2005 filing, the NYISO also intends to make three status reports to the Commission on July 1, October 1, and December 1, 2005.

Respectfully submitted,

NEW YORK INDEPENDENT SYSTEM  
OPERATOR, INC.

By:   
Elizabeth A. Grisar, Esq.

cc: Daniel L. Larcamp  
Anna Cochran  
Connie N. Caldwell  
Michael A. Bardee

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<sup>3</sup> The New York Transmission Owners that joined the February 28 filing are: LIPA, Niagara Mohawk, Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York Power Authority, New York State Electric & Gas Corporation, Orange & Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

**ATTACHMENT I**

## **ATTACHMENT I**

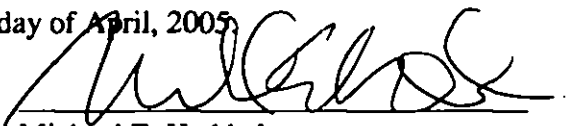
### **WORK PLAN FOR DELIVERABILITY ANALYSIS**

<b>April 18, 2005</b>	<b>Stakeholder meeting to review Work Plan and to identify issues related to study scope, models, assumptions and methodology</b>
<b>May 1, 2005</b>	<b>NYISO filing of Work Plan with Commission</b>
<b>May/June 2005</b>	<b>NYISO revision of study scope, assumptions and methodologies based upon stakeholder comments. Revisions to include consideration of both Zonal Resource Adequacy Analysis as well as the Intra-zonal Load Flow Analysis. Studies to be coordinated with the NYISO's Comprehensive Reliability Planning Process as well as with the IRM analysis conducted by the New York State Reliability Council.</b>
<b>July 1, 2005</b>	<b>NYISO submits status report to Commission</b>
<b>July/September 2005</b>	<b>NYISO to present interim study results and conduct stakeholder briefings and discussions to review interim study results. NYISO may revise analysis as needed in response to stakeholder comments.</b>
<b>October 1, 2005</b>	<b>NYISO submits status report to Commission</b>
<b>October/November 2005</b>	<b>NYISO to finalize study and prepare draft report for circulation to stakeholders. NYISO to revise report based upon stakeholder comments.</b>
<b>December 1, 2005</b>	<b>NYISO submits status report to Commission which will include the final NYISO study report</b>
<b>December/January 2006</b>	<b>NYISO to prepare draft compliance filing with Stakeholder input</b>
<b>February 6, 2006</b>	<b>NYISO and TOs submit compliance filing to Commission in response to August 6, 2004 Order</b>

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served the foregoing document on the official service list compiled by the Secretary in this proceeding. I also certify that I have electronically served a copy of this filing on the official representative of each of its customers, on each participant in its stakeholder committees, on the New York State Public Service Commission, and on the electric utility regulatory agencies of New Jersey and Pennsylvania.

Dated at Washington, DC this 29th day of April, 2005.



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