



July 26, 2024

VIA ELECTRONIC FILING

The Honorable Debbie-Anne Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Filing to Supplement the Record in Docket No. ER24-2270-000,
Ministerial Filing to Conform Section I.2.2 of the ISO New England Inc. Transmission,
Markets and Services Tariff to Reflect Only Commission-Accepted Language in the
eTariff Viewer**

Dear Acting Secretary Reese:

ISO New England Inc. (the “ISO”)¹ hereby submits this filing to supplement the record in the above-captioned proceeding with a request for waiver of the 60-day notice requirement.²

As detailed in the ISO’s June 13 filing letter, the Ministerial Filing to Conform Tariff was submitted to update the underlying base tariff in the FRM Offer Cap Filing, Docket No. ER24-1245-000.³ The Ministerial Filing to Conform Tariff proposes the removal of language from the base tariff submitted by the ISO and accepted by the Commission in other proceedings, but which is not yet effective for the FRM Offer Cap Filing. Those changes were included in the base document for the FRM Offer Cap Filing in error. The June 13 filing does not propose any new changes to the Tariff. The

¹ Capitalized terms used but not otherwise defined in this filing are intended to have the meaning given to such terms in the ISO New England Inc. Transmission, Markets and Services Tariff (the “Tariff”).

² See *ISO New England Inc.*, Ministerial Filing to Conform Section I.2.2 to Reflect Only Commission-Accepted Language in the eTariff Viewer, Docket No. ER24-2270-000 (filed June 13, 2024) (“Ministerial Filing to Conform Tariff”).

³ See *ISO New England Inc. and New England Power Pool*, Revise Forward Reserve Market Offer Cap and Offer Data Publication Timeline, Docket No. ER24-1245-000 (filed February 14, 2024) (“FRM Offer Cap Filing”).

ISO is requesting an effective date of April 15, 2024, the effective date the Commission accepted for the proposed Tariff changes submitted in the FRM Offer Cap Filing.

Pursuant to Section 35.11 of the Federal Energy Regulatory Commission's rules and regulations, 18 C.F.R. § 35.11, the ISO respectfully requests a waiver of the 60-day notice requirement to allow the ministerial conforming changes submitted in the Ministerial Filing to Conform Tariff to become effective on April 15, 2024, which is the date the FRM Offer Cap Filing changes went into effect. Good cause exists to grant this waiver request. The ministerial changes submitted in the Ministerial Filing to Conform Tariff simply remove from the base tariff document for the FRM Offer Cap Filing language that, as of the time of the April 15, 2024 effective date for the FRM Offer Cap Filing changes, was not yet in effect. As explained in the Ministerial Filing to Conform Tariff, the Tariff edits being removed are revisions to definitions that were proposed and accepted by the Commission in separate Section 205 filings, related to the Day-Ahead Ancillary Services Initiative and the Storage as a Transmission Only Asset project.⁴ These two sets of definitional changes have effective dates that are different from the effective date for the FRM Offer Cap Filing changes. Further, these definitional changes are unrelated to the changes to the Forward Reserve Market proposed in the FRM Offer Cap Filing. Therefore, there is minimal risk of prejudice or harm to stakeholders who had an interest in the FRM Offer Cap Filing. Further, allowing that language to remain in the base tariff document for the FRM Offer Cap Filing has the potential to create confusion, as the language to be removed was accepted in a separate filing with a later effective date.

Respectfully Submitted,

By: /s/ Julie Horgan
Julie Horgan
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
Tel: (413) 540-4683
Fax: (413) 535-4379

⁴ See Ministerial Filing to Conform Tariff at p. 3.