NEW YORK INDEPENDENT SYSTEM OPERATOR
Building the Energy Markets of Tomorrow . . . Today
10 Krey Boulevard, Rensselaer, NY 12144

Via US Mail and Email NAESB@NAESB.org

Ms. Rae McQuade
Director
North American Energy Standards Board
1301 Fannin, Suite 2350
Houston, TX 77002

Re: Order No. 698: Intraday Nomination Timeline Proposals

Dear Ms. McQuade,

The New York Independent System Operator, Inc. ("NYISO") wishes to make the following comments part of the record in the pending NAESB Wholesale Gas Quadrant's ("WGQ") discussions relating to the above referenced topic. It has come to the NYISO's attention that a proposal has been sponsored that contemplates the inclusion of an additional Intraday "bumping" cycle that would afford firm capacity holders an opportunity to insure that their daily nominations can be adjusted to be more closely aligned with the evening peak demands. The NYISO believes that the proposal would benefit many of its stakeholders, specifically owners of gas-fired generation, by making it easier for them to coordinate their natural gas and electricity market activities. The NYISO therefore supports the proposed establishment of an additional Intraday bumping cycle.

Please post this to NAESB WGQ committee webpage.

Sincerely,

Carl F. Patka
Senior Attorney

cc. Ernie Cardone, Industry Affairs Specialist
New York Independent System Operator
10 Krey Boulevard
Rensselaer, New York 12144