**Formal Comments Submitted by New York Independent System Operator, Inc.**

**Quadrant:** Wholesale Electric Quadrant

**Re:** Request for Formal Comments on the Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution, WEQ-008 Consistency Review, Standards Request R11020.

**Submitted By:** New York Independent System Operator, Inc. (“NYISO”)

**Date:** February 10, 2015

The New York Independent System Operator, Inc. (“NYISO”) appreciates the opportunity to offer comments in response to NAESB’s January 12, 2014 request for Formal Comments pertaining to the *2014 WEQ Annual Plan Items 1.a, 1.b, and 1.d – Parallel* *Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution, WEQ-008 Consistency Review, Standards Request R11020*

The NYISO recognizes that the WEQ Business Practices Subcommittee (“WEQ BPS”) has committed significant time and resources to developing the “Recommended” Standards.

The NYISO supports the effort to create IDC based visualization tools. These IDC improvements envisioned by the Draft Standards will improve transmission providers’ ability to understand and react to interregional transmission congestion.

Under the NYISO and PJM’s M2M agreement all transmission constraints that are significantly impacted by generation dispatch changes in the NYISO and PJM are jointly managed by the two Reliability Coordinators in real-time.

The NYISO notes that during the “Eighteen Month Field Trial” that the effects of the PFV software on the NYISO and PJM’s M2M congestion management process will be studied.

NYISO

Ernie Cardone