

From: [Shanahan, Brian](#)
To: [Herb](#)
Subject: RE: [EXTERNAL] FW: IBR Update and Comment Period
Date: Wednesday, April 26, 2023 10:10:01 AM

Comment on PRR-151:

The PRR-151 Implementation Plan, in part, states that “The six month implementation period is proposed in recognition of the time required for the NYISO, Transmission Owners and Large IBR Generating Facility Owners to develop compliance procedures,” with the intent that the new IBR Requirements be in place prior to the beginning of the next NYISO Class Year. It is likely that the NY Transmission Owners and the NYISO will need to first develop agreements on entity responsibilities where they are shared and/or uncertain, not unlike the existing NYISO-Transmission Owners CFR agreements. Following that, implementing procedures will need to be created/updated within each Company. This process may likely require longer than six months to fully conclude without implementing a compressed effort from all parties involved. The beginning of the next CY is an unknown at this point, and I agree that the new Rule should be in place prior to the next CY, however a longer implementation timeline, suggest 9 months, would be helpful and not likely infringe on the start of the next CY.

Basic comment is that 9 months vs 6 months is suggested for Implementation timeline.
