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March 8, 2013

By Electronic Delivery

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, D.C. 20426

**Re: Informational Filing and Request to Defer Action Regarding
TC Ravenswood, LLC's Black Start Service Rate Schedule;
Docket No. ER12-1418-000**

Dear Ms. Bose:

In a May 24, 2012, order in the above-captioned proceeding, the Federal Energy Regulatory Commission ("Commission") accepted TC Ravenswood, LLC's ("Ravenswood's") proposed stand-alone rate schedule to provide black start service in New York City ("Ravenswood Rate Schedule"), subject to refunds and further order, and established settlement procedures, which terminated on December 21, 2012.

The New York Independent System Operator, Inc. ("NYISO") is procuring black start service on an interim basis as the sole customer under the Ravenswood Rate Schedule because Ravenswood's steam turbine units play a significant role in the effectiveness and robustness of Consolidated Edison Company of New York, Inc.'s ("Con Edison's") local plan for restoring electric service to New York City.¹

Following termination of the Commission-sponsored settlement proceedings, the parties have continued productive discussions on open issues regarding the Ravenswood Rate Schedule. The NYISO believes that further action by the Commission is unnecessary at this

¹ The NYISO is procuring black start service under the Ravenswood Rate Schedule to ensure near-term reliability. The NYISO's procurement of this service does not represent or constitute an acceptance of the lawfulness of the Ravenswood Rate Schedule. The NYISO has reiterated its objections to the Ravenswood Rate Schedule in its June 25, 2012, request for rehearing in the above-captioned proceeding.

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time and respectfully requests that the Commission defer taking further action in this proceeding. The NYISO will report to the Commission within 180 days, or on such schedule as directed by the Commission, on the status of issues regarding the Ravenswood Rate Schedule, including indemnity obligations under the rate schedule. Ravenswood has made a similar request for the Commission to defer action at this time, and Con Edison has authorized the NYISO to represent that it supports the NYISO's request.

Sincerely,

/s/ Kevin W. Jones

Kevin W. Jones

Michael J. Messonnier, Jr.

Counsel for

New York Independent System Operator, Inc.