

June 24, 2014

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20245

Re: *Submission of Amendment in Docket No. ER14-1822-000 to Address eTariff Requirements in Connection with Joint Request that the Commission Hold Proceedings in Abeyance, Submitted in Docket Nos. ER14-1711-001 and ER14-1822-000 (Not Consolidated)*

On June 20, 2014, the New York Independent System Operator, Inc. (“NYISO”) and TC Ravenswood, LLC (“TCR”) filed a joint request to hold the proceedings in Docket No. ER14-1711 and ER14-1822 in abeyance (the “Joint Request”). TCR had submitted a tariff filing that initiated Docket No. ER14-1711 on April 11 and made an amended filing in that proceeding on May 19. The NYISO initiated Docket No. ER14-1822 by filing an unexecuted service agreement on April 30, 2014. The Joint Request explained that delaying action in both dockets would allow the NYISO, TCR, and other interested parties more time to engage in settlement discussions.

It has been brought to the NYISO’s attention that your office has determined that the Joint Request is subject to the eTariff filing requirements that are described at <http://www.ferc.gov/docs-filing/etariff/comm-order/extend-date.pdf> (“eTariff Requirements”). Under the eTariff Requirements “filings to extend the date by which the Commission must act are required to be made under the eTariff filing procedures for amendment filings in section 35.17(b) of the Commission’s regulations.”

Accordingly, the NYISO respectfully submits the pending tariff record from its April 30, 2014 filing in Docket No. ER14-1822 with the same text and proposed effective date as in the original filing.¹ The NYISO’s understanding is that the filing of a pending tariff record will be treated by the Commission as an amendment and, by complying with the eTariff requirements, will defer Commission action 60 days or, in this case, until August 25, 2014. This filing will also preserve the May 1, 2014 effective date originally requested by the NYISO. The NYISO also understands that TCR intends to make a similar filing in Docket No. ER14-1711.

Because this filing is designed to simply obtain an extension of the statutory date for the Commission to act on the NYISO’s proposed Unexecuted Minimum Oil Burn Agreement, the NYISO requests that the Commission provide a shortened comment period. The NYISO also

¹ As Attachment I to this filing letter, the NYISO is submitting a clean version of the proposed Unexecuted Minimum Oil Burn Agreement that it first submitted on April 30, 2014.

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requests that the Commission's notice specifically provide that comments, if any, on this filing shall be limited to the subject of the requested extension of the statutory date for Commission action.

This filing will be posted on the NYISO's website at www.nyiso.com. In addition, the NYISO will e-mail an electronic link to this filing to the official representative of each party to this proceeding, to each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities.

Please feel free to contact me if your office has any additional questions or if there is anything more that the NYISO should do to satisfy the eTariff Requirements.

Respectfully submitted,

/s/ Mollie Lampi

Mollie Lampi
Assistant General Counsel
New York Independent System Operator, Inc.

Cc: Michael Bardee
Gregory Berson
Anna Cochrane
Jignasa Gadani
Morris Margolis
Michael McLaughlin
David Morenoff
Daniel Nowak