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September 4, 2013

**By Electronic Delivery**

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

**Re: Update to 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 ("Consolidated Edison's") local plan for restoring electric service to New York City.

On March 8, 2013, the NYISO submitted an informational report indicating to the Commission that, notwithstanding the termination of Commission-sponsored settlement proceedings regarding the Ravenswood Rate Schedule, the parties continued to have productive discussions on open issues regarding the rate schedule. The NYISO, therefore, believed that further action by the Commission was unnecessary at that time, respectfully requested that the Commission defer taking further action in the proceeding, and indicated that

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it would report back to the Commission within 180 days to describe the status of issues regarding the Ravenswood Rate Schedule.<sup>1</sup>

In accordance with its March 8 informational filing, the NYISO submits this update. The NYISO continues to procure black start service under the Ravenswood Rate Schedule to ensure the robustness and effectiveness of Consolidated Edison's local black start plan.<sup>2</sup> In addition, the NYISO has continued to communicate with Ravenswood and with Consolidated Edison regarding Ravenswood's provision of black start service. Since the last informational report, Ravenswood has successfully conducted black start tests of its steam turbine units under testing requirements comparable to the testing requirements set forth in the NYISO tariffs.

The NYISO believes that further action by the Commission is unnecessary at this time and respectfully requests that the Commission continue to defer taking further action in this proceeding. The NYISO will continue to keep the Commission apprised of any material change in the status of issues regarding the Ravenswood Rate Schedule. Ravenswood and Con Edison have authorized the NYISO to represent that they support the NYISO's request.

Sincerely,

/s/ Kevin W. Jones

Kevin W. Jones

Michael J. Messonnier, Jr.  
Counsel for

New York Independent System Operator, Inc.

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<sup>1</sup> Ravenswood made a similar request for the Commission to defer action at that time. *See* Informational Filing and Request to Defer Action Regarding TC Ravenswood, LLC's Spot Black Start Service Rate Schedule, FERC Docket No. ER12-1418-000 (March 7, 2013).

<sup>2</sup> 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.