

October 7, 2014

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

Re: *Resubmission of Unexecuted Minimum Oil Burn Agreement Docket No. ER14-1822-000 and Request that the Commission Hold in Abeyance Proceeding in Docket No. ER14-1822-000*

On June 24, 2014 and again on August 20, 2014, the New York Independent System Operator, Inc. (“NYISO”) and TC Ravenswood, LLC filed requests simultaneously to hold the proceedings in Docket No. ER14-1711 and ER14-1822 in abeyance (the “Joint Request”). The Joint Request explained that delaying action in both dockets would allow the NYISO, TC Ravenswood, and other interested parties more time to engage in settlement discussions.

Since that time, TC Ravenswood, the NYISO, the New York State Public Service Commission (“NYSPSC”), Consolidated Edison Company of New York, Inc. (“Con Edison”) and other parties to the proceedings have continued their discussions with the goal of settling both dockets. The parties continue to work towards the goal of achieving a settlement that will be supported, or not opposed, by all parties to the two proceedings. The NYISO and TC Ravenswood believe we are very close to finalizing an agreement. However, the parties need additional time to resolve the language to be included in the settlement documents, obtain internal authority to finalize them, seek support from other parties, and make the appropriate filings with the Commission. The NYISO and TC Ravenswood have mutually agreed that each will seek to have the Commission hold their respective proceedings in abeyance for another 60 days, until December 5, 2014. While the NYISO believes the issues will settle and a filing will be made well before this date, requesting the full 60 day extension appears prudent.

Accordingly, the NYISO respectfully submits the pending tariff record from its April 30, 2014 filing in Docket No. ER14-1822-000 with the same text and proposed effective date as in the original filing.<sup>1</sup> The NYISO understands that filing a pending tariff record will be treated by the Commission as an amendment, defer Commission action for 60 more days, or until December 5, 2014, and preserve the May 1, 2014 effective date originally requested by the NYISO. The NYISO also understands that TC Ravenswood intends to make a similar filing in Docket No. ER14-1711-000.

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<sup>1</sup> 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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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.

This filing will be posted on the NYISO's website at [www.nyiso.com](http://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.

Respectfully submitted,

/s/ Mollie Lampi  
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