

December 19, 2014

The Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, N.E., Washington, DC 20426 10 Krey Boulevard 🔶 Rensselaer, NY 12144

THIS FILING LETTER DOES NOT CONTAIN PRIVILEGED MATERIAL

THIS FILING INCLUDES A NON-PUBLIC, PRIVILEGED DOCUMENT NOT TO BE RELEASED.

Re: *TC Ravenswood, LLC,* Docket No. ER14-1711 and *New York Independent System Operator, Inc.*, Docket No. ER14-1822 (Not Consolidated), Compliance Filing of Settlement Document in eTariff Format

Dear Secretary Bose:

Pursuant to Paragraph 19 of the Commission's December 5, 2014 order approving the uncontested settlement in these dockets,1 the NYISO is submitting the Settlement in its entirety as tariff records in eTariff format with a May 1, 2014 effective date. The Offer of Settlement with its public Appendices A and B, signature pages, an Explanatory Statement and a privileged and confidential Appendix B were initially submitted by TC Ravenswood, LLC, the New York Independent System Operator, Inc., Consolidated Edison Company of New York, Inc., the City of New York, New York Power Authority, and the New York State Public Service Commission on October 20, 2014.

The Offer of Settlement with its two public Appendices, Appendix A and Appendix B, will be added to the NYISO Agreements section of the NYISO's eTariff. The Explanatory Statement and privileged Appendix B will be submitted but will not appear in the NYISO Agreements eTariff record. The NYISO is requesting that the Commission treat the non-public Appendix B as privileged material pursuant to 18 C.F.R. § 388.112.

The privileged Appendix B contains commercially sensitive and valuable information concerning the costs TC Ravenswood experiences to respond to the New York State Reliability

¹ T.C. Ravenswood LLC, New York Independent System Operator, Inc., 149 FERC ¶ 61,203 (December 5 Order).

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Council's Local Reliability Rule I-R3 (Loss of Generator Gas Supply - New York City). TC Ravenswood LLC provided a proposed form of protective order as Appendix A in its April 11, 2014 rate filing in ER14-1711-000 to protect information provided in that docket that was similar in nature to the information contained in the privileged Appendix B. This protective order is available if disclosure of the privileged Appendix B is sought.2

I. Documents Submitted

- 1. This filing letter;
- 2. The Offer of Settlement with two public Appendices A and B ("Attachment I");
- 3. The Explanatory Statement ("Attachment II"); and
- 4. The non-public Privileged and Confidential Appendix B ("Attachment III")

II. Communications and Correspondence

All communications and service in this proceeding should be directed to:

Robert E. Fernandez, General Counsel Ray Stalter, Director of Regulatory Affairs *Mollie Lampi, Assistant General Counsel 10 Krey Boulevard Rensselaer, NY 12144 Tel: (518) 356-7530 Fax: (518) 356-7678 rfernandez@nyiso.com mlampi@nyiso.com rstalter@nyiso.com

*Persons designated for receipt of service.

² The protective agreement referenced herein was filed only in docket ER14-1711-000. Because dockets ER14-1711-000 and ER14-1822-000 were not consolidated, to the extent necessary, the NYISO requests waiver of 18 C.F.R. § 388.112 to permit it to satisfy the requirement to provide a proposed form of protective agreement by identifying the protective agreement filed in one of the two dockets in which this compliance filing is being made.

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III. <u>Service</u>

The NYISO will send an electronic link to this filing with Attachments I and II only to the official representative of 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. In addition, the complete filing public filing will be posted on the NYISO's website at <u>www.nyiso.com</u>. At this time, the privileged Appendix B is being provided only to the Commission.

IV. Conclusion

The New York Independent System Operator, Inc. respectfully requests that the Commission accept this filing, with a May 1, 2014 effective date, in full compliance with its December 5, 2014 Order.

Respectfully submitted,

<u>/s/ Mollie Lampi</u> Mollie Lampi Assistant General Counsel New York Independent System Operator, Inc. 10 Krey Blvd. Rensselaer, New York 12144 (518) 356 7530 mlampi@nyiso.com

cc: Michael A. Bardee Gregory Berson Anna Cochrane Jignasa Gadani Morris Margolis Michael McLaughlin David Morenoff Daniel Nowak Jamie Simler