

December 18, 2015

By Electronic Delivery

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Docket No. ER16-81-000, Huntley Power LLC

Dear Secretary Bose:

On October 14, 2015, Huntley Power LLC (“Huntley”) filed an unexecuted cost-of-service agreement, designated as Huntley’s FERC Electric Rate Schedule No. 1 (“Rate Schedule”). On December 7, 2015, Huntley filed an Amended Application to revise the Rate Schedule that it filed on October 14, 2015. Huntley’s Amended Application incorporated the result of its discussions with the New York Independent System Operator, Inc. (“NYISO”) into the proposed Rate Schedule. Although the NYISO and Huntley were not able to reach agreement on all issues related to the non-rate terms and conditions of service, the NYISO appreciates Huntley’s efforts to develop an amended Rate Schedule.

While the NYISO was working with Huntley to revise the non-rate terms and conditions of the Rate Schedule, the NYISO was also working with National Grid, to determine if a local Reliability Need might require the NYISO to enter into the Rate Schedule with Huntley for a period of months. The NYISO has determined that the retirement of Huntley Units 67 and 68 on March 1, 2016 (along with the Mothball Outage of all remaining Dunkirk Units) is not expected to result in any national, regional, state or local reliability criteria violations, and that both Huntley Generators can be Retired on March 1, 2016.

The NYISO’s made its determination based on the NYISO’s proposed rules addressing RMRs that are pending Commission review in Docket No. ER16-120-000. Under its proposed rules, the NYISO would only enter into an RMR Agreement to address an identified “Reliability Need.” A Reliability Need is defined as “[a] condition identified by the ISO as a violation or potential violation of one or more Reliability Criteria and, for purposes of administering the Gap Solution process in Section 31.2.11, applicable local criteria.”¹

¹ See NYISO’s Proposed OATT Section 31.1.1. “Reliability Criteria” are the electric power system planning and operating policies, standards, criteria, guidelines, procedures, and rules promulgated by the North American Electric Reliability Corporation, Northeast Power Coordinating Council and the New York State Reliability Council.

Attached are (1) a letter dated December 11, 2015 from Mr. Rick Gonzales (NYISO) to Mr. John Spink (National Grid), requesting confirmation that it will not be necessary to retain Huntley Units 67 and/or 68 to meet local reliability criteria; and (2) a response dated December 16, 2015 from Mr. Spink to Mr. Gonzales confirming that it is not necessary to retain the Huntley or Dunkirk plants in order to satisfy National Grid's local reliability planning criteria.

The NYISO's determination has been communicated to Huntley, and this filing will be publicly posted on the NYISO's web site. The NYISO does not intend to execute a Reliability Must-Run Agreement with Huntley, or to further participate in this Docket.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

/s/ Alex M. Schnell

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