

October 20, 2014

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

**Re: TC Ravenswood, LLC, Docket No. ER14-1711 and New York Independent System Operator, Inc., Docket No. ER14-1822 (Not Consolidated)**

Dear Secretary Bose:

Pursuant to Rule 602 of the Federal Energy Regulatory Commission's ("FERC" or the "Commission") Rules of Practice and Procedure, 18 C.F.R. § 385.602 (2014), TC Ravenswood, LLC ("TC Ravenswood"), the New York Independent System Operator, Inc. ("NYISO"), Consolidated Edison Company of New York, Inc. ("Con Edison"), the City of New York, New York Power Authority ("NYPA"), and the New York State Public Service Commission (collectively, "Settling Parties") hereby submit an uncontested Offer of Settlement in the above-captioned proceedings.

This Offer of Settlement is being submitted by the Settling Parties and resolves, for a three-year period (May 1, 2014 through April 30, 2017), all issues raised or that could have been raised in Docket No. ER14-1711-000 and Docket No. ER14-1822, except that the Offer of Settlement specifically does not resolve: (1) TC Ravenswood's legal authority, if any, to have its own rate schedule on file under Federal Power Act Section 205 setting forth rates and terms and conditions under which it would burn fuel oil in lieu of natural gas in furtherance of Rule I-R3, and (2) TC Ravenswood's obligation, if any, to burn Fuel Oil in lieu of natural gas in furtherance of Rule I-R3 and to be compensated for doing so, pursuant to an unexecuted Implementation Agreement under Section 4.1.9 of the NYISO's Market Administration and Control Area Services Tariff. The Settling Parties have carved these issues out of the Offer of Settlement in order to provide a means for TC Ravenswood to burn Fuel Oil in lieu of natural gas in furtherance of Rule I-R3 during a three-year term while preserving the respective legal positions on these issues for all Settling Parties. This filing contains copies of or references to all documents relevant to this Offer of Settlement. Enclosed with this letter are: (a) an Explanatory Statement, (b) the Offer of Settlement and (c) a Certificate of Service.

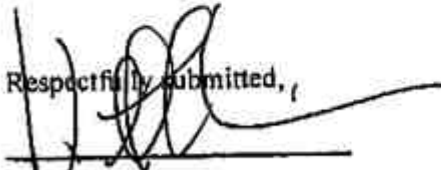
A copy of this filing is being served on the Service List in the above-referenced proceedings.

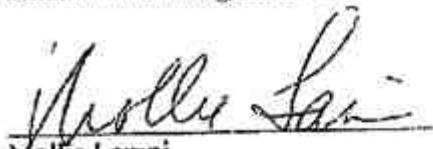
Pursuant to Rule 212 and 602(f)(2), the Settling Parties respectfully request that comments on the Offer of Settlement be filed on or before October 30, 2014 and reply comments be filed on or before November 4, 2014, unless other dates are provided by the Commission. In addition, the Settling Parties respectfully request an order be issued by the Commission on or before December

20, 2014 approving the Offer of Settlement with an effective date of May 1, 2014 as a Settlement Agreement entered into in Docket No. EL10-70 expired on April 30, 2014. An effective date of May 1, 2014 would align with the agreement set forth in the Offer of Settlement and aligns with the operational and financial commitments TC Ravenswood has made with its vendors to maintain uninterrupted and reliable service. A decision by December 20, 2014 will enable the NYISO to begin the process of effectuating payments according to the agreement and schedule set forth in the Offer of Settlement.

The Parties request that the Commission approve the Offer of Settlement without condition or modification, as fair, reasonable and in the public interest and grant such other relief that the Commission determines is necessary to implement the Offer of Settlement.

Respectfully submitted,

  
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