

August 20, 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 20, 2014, the New York Independent System Operator, Inc. (“NYISO”) and TC Ravenswood, LLC filed a joint request to hold the proceedings in Docket No. ER14-1711 and ER14-1822 in abeyance (the “Joint Request”). On June 24, 2014, both the NYISO and TC Ravenswood refiled the unexecuted agreement and the pending rate schedule, as applicable, in the respective dockets in order to effectuate 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. TC Ravenswood and the NYISO are still working toward the goal of achieving a settlement that will be supported, or not opposed, by all parties to the two proceedings. However, principally due to the conflicting schedules of those involved in the discussions, the parties need additional time to resolve the issues, 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 October 17, 2014. While the NYISO believes the issues will settle and a filing will be made before this date, requesting the full 60 day extension appears prudent and should avoid the need for another request.

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.¹ 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 October 17, 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.

¹ 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.

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. 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

Mollie Lampi
Assistant General Counsel
New York Independent System Operator, Inc.
(518) 356 7530

Cc: Michael Bardee
Gregory Berson
Anna Cochrane
Jignasa Gadani
Morris Margolis
Michael McLaughlin
David Morenoff
Daniel Nowak