

September 12, 2014

Honorable Kathleen H. Burgess  
Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3, 19th Floor  
Albany, New York 12223-1350

Subject: CASE 05-E-0889 – Proceeding on Motion of the Commission to Establish  
Policies and Procedures Regarding Generation Unit  
Retirements.

Dear Secretary Burgess:

Submitted for filing herewith in the above-entitled proceeding is the response of the New York Independent System Operator, Inc. to the August 14, 2014 letter request of Mr. Raj Addepalli, Director, Office of Electric, Gas and Water regarding a determination of whether the mothballing of the TC Ravenswood, LLC GT 3-3 Combustion Turbine Facility would have an adverse impact on the reliability of the New York State transmission system.

Please contact me at (518) 356-6220 or at [cpatka@nyiso.com](mailto:cpatka@nyiso.com) if you have any questions or concerns.

Very truly yours,

/s/ Carl Patka

Carl Patka

Assistant General Counsel

September 11, 2014

Raj Addepalli  
Director, Office of Electric, Gas, and Water  
State of New York Department of Public Service  
Three Empire State Plaza  
Albany, New York 12223

Subject: Mothballing of TC Ravenswood, LLC GT 3-3 Combustion Turbine

Dear Mr. Addepalli:

In your August 14, 2014 letter, you requested that the New York Independent System Operator, Inc. (NYISO) determine whether the mothballing of the TC Ravenswood, LLC GT 3-3 Combustion Turbine facility (the "Facility") would have an adverse impact on the reliability of the New York State transmission system. As a threshold matter, it is important to note that the retirement of any generating facility resource could have adverse impacts on the short-term and long-term reliability of the New York State transmission system.

The NYISO has performed a transmission security assessment for that portion of the transmission system operated by the NYISO and found that the mothballing of the Facility does not change the findings of the draft 2014 Reliability Needs Assessment.

Additionally, the NYISO assessed the resource adequacy of the overall system with the Facility mothballed, per the one-day-in-ten-years Loss of Load Expectation (LOLE) criterion, which measures the probability of disconnecting firm load due to a resource deficiency. The mothballing of the Facility is not expected to materially impact the findings of the draft 2014 Reliability Needs Assessment.

The NYISO and Con Edison have coordinated analysis of the impact of the mothballing of the Facility. Con Edison has informed the NYISO that it has completed studies for their local system and determined that reliability of service will be maintained on that company's local transmission system with the mothballing of the Facility.

If desired, the NYISO would be willing to meet with you and your staff to further discuss these matters.

Very truly yours,

Wes Yeomans  
Vice President, Operations

cc: Mr. Brian Horton – Con Edison  
Mr. Michael Forte – Con Edison  
Ms. Diane Barney – DPS  
Mr. Edward Schrom – DPS

Mr. Steve Whitley – NYISO  
Mr. Rick Gonzales – NYISO  
Mr. Henry Chao – NYISO  
Mr. Carl Patka - NYISO