



CAYUGA OPERATING COMPANY, LLC
228 Cayuga Drive
Lansing, NY 14882
Telephone: (607) 533-7913

Via Electronic Mail

February 17, 2020

Hon. Michelle L. Philips
Acting Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Notice of Intent to Retire Cayuga Operating Company LLC - Units 1 and 2

Dear Secretary Philips:

Pursuant to the New York State Public Service Commission's (the "Commission") Generating Unit Retirement Order,¹ Cayuga Operating Company LLC ("Cayuga") hereby provides notice that, due to sustained uneconomic conditions and regulatory uncertainty, it intends to retire both coal generating units at the site. Unit number one (Unit 1) has a DMNC capacity of 154.1 MWs and Unit number two (Unit 2), has a DMNC capacity of 154.7 MWs. Unit 2 is currently in an ICAP Ineligible Forced Outage, which it entered on July 1, 2018, and Unit 1 entered a mothball outage state on October 28, 2019. The effective date for retirement is August 15, 2020.

Units 1 and 2 are interconnected with the New York State Electric & Gas Corporation ("NYSEG") at the Milliken Switchyard in Lansing, NY. Should the New York Independent System Operator, Inc. ("NYISO") determine that a system reliability need would not result from the deactivation of Units 1 and 2, Cayuga requests a waiver of the Commission's 180-day notice requirement so that it can retire Units 1 and 2 as soon as May 17, 2020 in accordance with the NYISO process. Cayuga maintains all rights with respect to withdrawal of this notice in a timely manner should conditions warrant such action.

As identified below, Cayuga is contemporaneously sending a copy of this notice to the NYISO via electronic mail to its designated address and to NYSEG.

Please contact me at (212) 343-8353 if you have any questions concerning this notice.

Sincerely,

Cayuga Operating Company, LLC

Nazar Khan
Senior Vice President

cc: NYISO at generator_retirement@nyiso.com
David Kimiecik, NYSEG, Energy Services
David Drexler, Esq., New York State Department of Public Service
Leka Gjonaj, New York State Department of Public Service

¹ Case 05-E-0889, Proceeding on Motion of the Commission to Establish Policies and Procedures Regarding Generation Unit Retirements, *Order Adopting Notice Requirements for Generation Unit Retirements* (Dec. 20, 2005).