

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

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United States Department of Energy)

Docket No. ER03-246-000

AFFIDAVIT OF
JOHN A. RAVALLI

John A. Ravalli, having been duly sworn under oath deposes and says:

1. My name is John A. Ravalli. I am the Supervisor of Operations at the New York Independent System Operator, Inc. (“NYISO”), located in Schenectady, NY. As Supervisor of Operations, I am responsible for overseeing operations of the New York Control Area during the hours in which I am on duty, including supervising the Shift Supervisor.

2. On August 16, 2002, I supervised the operations of the New York Control Area, including coordination with ISO New England, Inc. (“ISO New England”), and other entities in surrounding control areas.

3. At approximately 3:30-4:00 p.m. on the afternoon of August 16, 2002, I initiated conversations with the Long Island Power Authority (“LIPA”) operations personnel concerning the Secretary of Energy’s Order No. 202-02-1 (“Emergency Order”).

4. Following my initial conversation with LIPA, I held discussions over the next several hours with operations personnel at ISO New England and LIPA concerning the implementation of the Emergency Order. By the conclusion of these discussions, the NYISO, ISO New England, and LIPA had agreed as to how the Cross Sound Cable ("CSC") would be used to deliver energy to avoid load shedding in the event that LIPA had taken all other actions to avoid load shedding, including the depletion of reserves and reduction of voltage. Each of the NYISO, ISO New England, and LIPA understood that the parties would apply the Connecticut Valley Exchange ("CONVEX") Operating Instructions in the event that use of the CSC became necessary.

5. Since ISO New England controlled the dispatch of the cable, the emergency operating protocol for the NYISO operations staff was limited and straightforward. Upon receiving a request from LIPA for emergency power, NYISO staff were to confirm that the emergency condition existed on the LIPA system and then contact ISO New England to initiate the flow of energy across the cable. It was my understanding that ISO New England would rely on the CONVEX Operating Instructions and other existing procedures to accomplish the dispatch.

6. On August 16, 2002, a copy of the Emergency Order was entered into the NYISO's "memo book," which serves as a record of NYISO operations. At 5:08 p.m. on August 16, 2002, I notified NYISO control room operators and Operations Department managing personnel by e-mail that the Department of Energy had issued the Emergency Order to allow the NYISO and ISO New England to use the CSC to prevent load shedding on Long Island or Connecticut. In this e-mail, I informed NYISO control room operators and Operations Department managing personnel of the Emergency Order, and detailed the protocol for implementing this Emergency Order.

7. Getting the cable ready for operation required some steps in addition to the coordination between the two control area operators. Specifically, it was necessary for LIPA to close the disconnects at its substation at Shoreham. In this case, LIPA informed the NYISO during the evening of August 16th that it had taken this step. The NYISO System Operator's Daily Log confirms that this was done. An entry made at 8:30 p.m. on August 16, 2002 states: "ISO HAD MULTIPLE CONVERSATIONS WITH LI AND ISONE REGARDING CSC. FAXED DOE LETTER TO ISONE AND DISCUSSED THAT LI WAS IN NEED OF CALLING TRANSENERGY TO CLOSE THE SWITCH DISCONNECTS IN ORDER TO HAVE CSC READY FOR ENERGIZATION. LI AND ISONE AGREE TO CLOSE SWITCH DISCONENECTS AND READY CABLE FOR ENERGIZATION."

8. I have reviewed the NYISO Shift Supervisor's Daily Log, and at 8:45 p.m. on August 16, 2002, there was an entry made into the log stating: "NYISO S.O. FAXED DOE LETTER ABOUT CROSS SOUND CABLE TO ISONE. DISC CLOSED AT BOTH ENDS. ALL PARTIES AGREE ON EMERGENCY ENERGY PROCEDURE." Once these measures were taken, the Cross Sound Cable was available for emergency operation.

9. This concludes my affidavit.

John A. Ravalli
Supervisor of Operations
New York Independent System Operator, Inc.

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Subscribed and sworn to before me
this 30th day of January, 2003.

Notary Public