

September 8, 2005

VIA OVERNIGHT DELIVERY

Hon. Jaclyn A. Brillling, Secretary
Public Service Commission of the State of New York
Three Empire State Plaza
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: Initial Comments

Dear Secretary Brillling:

Enclosed for filing in the above-entitled proceeding are an original and five copies of the Initial Comments of the New York Independent System Operator, together with a Certificate of Service of these Initial Comments on all parties on the service list in this proceeding. Should you have any questions, I can be reached at the above address, by phone at (518) 356-6220 or by e-mail at cpatka@nyiso.com.

Very truly yours,

Carl F. Patka

