



February 26, 2013

Ms. Kimberly D. Bose
Office of the Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C.20426

Subject: INFORMATIONAL FILING
TC Ravenswood, L.L.C., Docket No. ER12-1418-000

Dear Ms. Bose:

This letter is submitted to the Commission on behalf of the New York State Reliability Council ("NYSRC") in the above docket for informational purposes only. No action by the Commission is requested.

On May 24, 2012, the Commission issued an order accepting and suspending TC Ravenswood's filed rate schedule proposing to sell black start service in the New York Control Area.¹ Since the issuance of the Commission's order, the NYSRC has raised with TC Ravenswood a number of concerns with respect to the consistency of the black start service it will provide under its separate rate schedule and the requirements under NYSRC's Reliability Rules on System Restoration Service.

In response to the NYSRC's concerns, TC Ravenswood has voluntarily agreed to clarify several aspects of its rate schedule and to take a number of actions with respect to the testing procedure for the steam units used to provide black start service, the certification of test results, the training of its black start personnel, and the coordination of its black start service with the system restoration plans of the New York Independent System Operator ("NYISO") and the Consolidated Edison Company of New York, Inc. ("Con Edison"). Two letters from TC Ravenswood's counsel to the NYSRC counsel setting forth these clarifications and actions are submitted as an attachment to this letter.

The NYSRC appreciates TC Ravenswood's willingness to respond to the concerns that the NYSRC has raised with respect to the black start service it will provide under its tariff and believes that, as a result of the actions that TC Ravenswood has agreed to undertake, there can be greater confidence that the TC Ravenswood black start facilities and personnel will be able to effectively respond to a major system outage, and to coordinate their efforts with the system restoration plans of the NYISO and Consolidated Edison.

¹ TC Ravenswood LLC, 139 FERC ¶61,151 (2012). The NYSRC submitted comments in this proceeding on April 12, 2012, and on May 8, 2012 submitted the final report of the NYSRC's Reliability Compliance Monitoring Subcommittee ("RCMS") titled "Evaluation of the New York Control Area Black Start Program."

Ms. Kimberly D. Bose

February 26, 2013

Page 2

Notwithstanding the clarifications and actions agreed to by TC Ravenswood, the NYSRC continues to be concerned that the provision of black start service, which is very important to the reliability of the bulk power system in the NYCA and to the health and safety of the residents of New York State, is not clearly subject to the requirements of the NYSRC's Reliability Rules and compliance monitoring procedures and is not fully integrated into the NYISO's NYCA system restoration plan. Consequently, the NYSRC may request permission from the Commission to submit further comments in this proceeding concerning the reliability of the NYCA bulk power system when it deems necessary.

Please contact the undersigned if you have any questions concerning this letter.

Sincerely,

/s/ Michael B. Mager

Michael B. Mager
Chairman
New York State Reliability Council, L.L.P.
Couch White LLP
P.O. Box 22222
540 Broadway
Albany, NY 12201
(518) 320-3409
mmager@couchwhite.com

Paul L. Gioia
Whitman Osterman & Hanna, LLP
One Commerce Plaza
Albany, NY 12260
(518) 487-7624
pgioia@woh.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Washington, D.C. this 26th day of February, 2013.

/s/ Carlos L. Sisco

Carlos L. Sisco

Senior Paralegal

Winston & Strawn LLP

1700 K Street, N.W.

Washington, DC 20006-3817

202-282-5000