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July 11, 2007

Leonard H. Singer, Esq. Couch White, LLP 540 Broadway P.O. Box 22222 Albany, New York 12201-2222

Re: New York PSC Case No.: 06-T-0650 - Application of New York Regional Interconnect Inc. for a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII for a High Voltage Direct Current Electric Transmission Line Running Between National Grid's Edic Substation in the Town of Marcy, and Central Hudson Gas & Electric's Rock Tavern Substation Located in the Town of New Windsor

Dear Mr. Singer:

This response to your letter to Mr. P. Donald Raymond is provided on behalf of the New York State Reliability Council (NYSRC).

The New York Independent System Operator (NYISO) is obligated to comply with the Reliability Rules established by the NYSRC. The NYISO, in turn, is obligated to secure compliance with the NYSRC Reliability Rules by all parties who interconnect with the New York State bulk power system or who participate in the NYISO's competitive markets. It also should be noted that the New York Public Service Commission has adopted all of the NYSRC's Reliability Rules as New York State reliability requirements.

With specific reference to the proposed construction and operation of the NYRI transmission line adjacent to the Millennium Pipeline Project right of way, certain provisions of the Reliability Rules appear to be relevant, including the following:

Section II, B. Transmission Capability - Planning

- Table A Design Criteria Contingencies
 - f. Simultaneous permanent loss of both poles of a direct current bipolar HVDC facility without an ac fault.

• Table B - Extreme Contingencies

- c. Loss of all transmission circuits on a common right-of-way.
- i. Sudden loss of fuel delivery system to multiple plants (i.e., gas pipeline contingencies).

The NYSRC's Reliability Rules are available on its website: NYSRC.org, under Documents. For your convenience, I am enclosing a copy of Section II, B of the Reliability Rules.

Please contact me if you have any questions concerning this response.

Sineerely

Paul L. Giora Counsel

New York State Reliability Council, L.L.C.

Enclosure/97648