



August 20, 2003

VIA HAND DELIVERY

Honorable Eleanor Stein Administrative Law Judge New York State Department of Public Service Three Empire Plaza Albany, New York 12223

Re:

Case 03-E-0188 - Proceeding on Motion of the Commission Regarding a

Retail Renewable Portfolio Standard

Dear Judge Stein:

The New York State Reliability Council ("NYSRC") is a limited liability company established to promote and preserve the reliability of electric service for the benefit of all market participants in the New York Control Area. The Federal Energy Regulatory Commission approved the NYSRC as the organization responsible for developing reliability standards applicable to the operation of the NYISO. One of the NYSRC's responsibilities is to establish an annual statewide installed capacity requirement to be implemented by the NYISO.

The quantity and composition of supply and demand resources in the New York Control Area could have an effect on the development of the statewide installed capacity requirement and the implementation of that requirement by the NYISO. Furthermore, the design of the Renewable Portfolio Standard ("RPS") may have significant impacts on the reliability of the New York State bulk power system. Consequently, the NYSRC urges the Commission to consider the reliability impacts of potential RPS designs and to ensure that the design adopted is consistent with, and preferably enhances, the continued reliability of the New York State bulk power system. In its comments submitted on June 9, 2003, the NYSRC expressed support for a meeting to consider the potential reliability impacts related to the design and implementation of RPS. The NYSRC continues to support the convening of such a meeting as soon as possible. Furthermore, the NYSRC is prepared to provide assistance in the preparation and review of any study of the potential reliability impacts of RPS that may be undertaken.

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Your consideration of these comments is appreciated.

Sincerely,

Kenneth Haase / NMK

Chairman, NYSRC

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cc:

Honorable Jaclyn Brilling, Acting Secretary