

MARBLE RIVER
WIND FARM®

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Churubusco, NY 12923

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A wind farm owned by Marble River, LLC

The Honorable Jeffrey C. Cohen
Acting Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

February 26, 2013

Re: *Application of the New York Power Authority for an Amendment to the Certificate of Environmental Compatibility and Public Need for the Moses to Plattsburgh Transmission Facility for the Moses-Willis Circuit Separation project (Case 13-T-0035)*

Dear Secretary Cohen:

Marble River, LLC ("Marble River") owns and operates Marble River Wind Farm (the "Project"), a 215.25 MW windfarm in Churubusco, New York, and which began commercial operations in November 2012. The Project is interconnected with the transmission system owned by the New York Power Authority ("NYPA") and operated by the New York Independent System Operator ("NYISO"). Marble River sells RPS-eligible renewable energy attributes to the New York State Energy Research and Development Authority ("NYSERDA") through a long-term agreement.

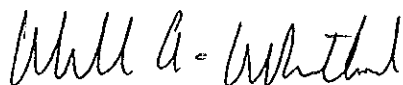
Marble River supports the above-referenced application of NYPA to amend its Certificate of Environmental Capablility and Public Need ("Certificate") to faciliate the construction of the Moses-Willis Circuit Separation Project. Construction of the Moses-Willis Circuit Separation Project will improve transmission reliability in the region.

The two circuits are the only two 230kV lines that provide connectivity to NYISO from the Zone D northern regions, and they provide outlet capacity for the wind recourses in Zone D such as the Project. Further, the circuits provide reliable backbone transmission service for Zone D load. The current double-string circuit contingency reduces transmission reliability by potentially causing voltage, thermal and load shedding issues. It also effectively reduces the deliverability of power across the Moses-Willis-Plattsburgh transmission. Furthermore, as currently configured, if a Moses-Willis structure is damaged, both circuits would be out of service during

the weeks or months required for repair. Separating the circuits also will allow NYISO to operate the bulk power system more efficiently by removing the double circuit contingency operational restriction. NYPA's proposed Moses-Willis Circuit Separation Project will address all of these issues and should be approved by the Commission.

Thank you for considering these comments.

Best regards,

A handwritten signature in black ink, appearing to read "Will A. Whitlock". The signature is written in a cursive, flowing style.

William A. Whitlock
Executive Vice President, Eastern Region

A handwritten signature in black ink, appearing to read "Mose". The signature is written in a cursive, flowing style.