

May 19, 2015

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: Niagara Mohawk Power Corporation d/b/a National Grid  
Docket No. ER15-\_\_\_\_-000**

**Filing of Amended Interconnection Agreement with General  
Mills Operations Inc. and Request for Waiver of Commission  
Notice Requirement**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”),<sup>1</sup> and Part 35 of the Federal Energy Regulatory Commission’s (“Commission”) regulations,<sup>2</sup> Niagara Mohawk Power Corporation d/b/a/ National Grid (“National Grid”) submits an amended Interconnection Agreement (“Interconnection Agreement”) with General Mills Operations, LLC (“General Mills”).<sup>3</sup> The enclosed Interconnection Agreement amends the original Interconnection Agreement already on file with the Commission to extend its term, update outdated references, and make minor clarifying changes and corrections. National Grid requests waiver of the Commission’s prior notice requirement to permit the amended Interconnection Agreement to go into effect as of April 1, 2015.

**I. Background**

The Interconnection Agreement sets forth the terms under which National Grid provides interconnection service to General Mills. The Commission accepted the original Interconnection Agreement effective as of October 5, 2004.<sup>4</sup>

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<sup>1</sup> 16 U.S.C. § 824d.

<sup>2</sup> 18 C.F.R. Part 35.

<sup>3</sup> This filing refers to National Grid and General Mills together as the parties to the Interconnection Agreement.

<sup>4</sup> Commission Letter Order, Docket No. ER05-57-000 (Dec. 13, 2004). The original Interconnection Agreement is designated as Service Agreement No. 337 under the Open Access Transmission Tariff of the New York Independent System Operator, Inc. (“NYISO”).

## **II. The Amended Interconnection Agreement**

The parties have amended the Interconnection Agreement to make it effective April 1, 2015 and extend its term through September 30, 2017.<sup>5</sup> They have also amended the Interconnection Agreement to update outdated references and make minor clarifying changes and corrections.<sup>6</sup>

## **III. Effective Date and Request for Waiver**

The Recitals to the amended Interconnection Agreement specify an effective date of April 1, 2015.<sup>7</sup> Accordingly, National Grid respectfully requests that the amended Interconnection Agreement be permitted to go into effect as of April 1, 2015, and that the Commission grant waiver of the notice provisions in its regulations that require the filing of service agreements no more than 30 days after service has commenced.<sup>8</sup>

Granting the requested effective date will permit the amended Interconnection Agreement to become effective as of the date agreed upon by the parties and will not result in prejudice to any party. For these reasons, the Commission should find that good cause exists to grant an effective date of April 1.

## **IV. Documents Enclosed**

In addition to this filing letter, attached are the following documents:

- i. The amended Interconnection Agreement, provided in clean format (Attachment A); and
- ii. Black-lined revisions showing the amendments to the original Interconnection Agreement (Attachment B).

## **V. Communications and Service**

Communications regarding this filing should be addressed to the following individuals, whose names should be entered on the official service list maintained by the Secretary for this proceeding:

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<sup>5</sup> Amended Interconnection Agreement, Recitals and Section 11.1. Although section 11.1 of the original Interconnection Agreement states that it will continue in effect for ten years, the parties have continued to follow the terms of the original Interconnection Agreement to the present day and have not filed to terminate it.

<sup>6</sup> These amendments are shown in the black-lined revisions contained in Attachment B to this filing.

<sup>7</sup> See also amended Interconnection Agreement, Section 11.1 (stating that the amended Interconnection Agreement “shall become effective as of the EFFECTIVE DATE, subject to its approval or acceptance for filing by the FERC”).

<sup>8</sup> Specifically, pursuant to of Section 35.11 of the Commission’s regulations (18 C.F.R. § 35.11), National Grid requests waiver of Section 35.3 of the Commission’s regulations (18 C.F.R. § 35.3).

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Copies of this filing have been served on General Mills and the NYISO.

## **VI. Conclusion**

For the reasons stated herein, National Grid respectfully requests that the Commission accept the amended Interconnection Agreement contained in this filing effective April 1, 2015.

Respectfully submitted,

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