



Marc Richter
Vice President
Regulatory Services

June 3, 2015

**CONTAINS CRITICAL ENERGY
INFRASTRUCTURE INFORMATION**

By Electronic Delivery

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

Re: Filing of an Executed Interconnection Agreement Between the Orange and Rockland Utilities, Inc. and Consolidated Edison Company of New York, Inc., and Request for Critical Energy Infrastructure Information Designation, Docket No. ER15-____-000

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act¹ and Section 35.12 of the Commission's Regulations,² Orange and Rockland Utilities, Inc. ("O&R") and Consolidated Edison Company of New York, Inc. ("Con Edison") hereby tender for filing an executed Interconnection Agreement ("Agreement"), designated as Service Agreement No. 2216, between O&R and Con Edison (collectively, the "Parties").

Con Edison and O&R request a June 4, 2015 effective date for the Agreement and further request a waiver of the normal 60-day notice period, as discussed fully below.

Because this interconnection is between two transmission owners, it is not subject to the New York Independent System Operator, Inc.'s ("NYISO's") interconnection process. As such, the NYISO is not a party to this Agreement. Two-party

¹ 16 U.S.C. § 824d (2006).

² 18 C.F.R. § 35.12 (2008).

interconnection agreements are designated as Service Agreements under the NYISO Open Access Transmission Tariff (“OATT”).³

I. BACKGROUND

The Agreement provides for the reconnection by Con Edison of a transmission line that is owned by O&R. Specifically, this interconnection agreement provides for the relocation of the interconnection point of O&R’s transmission line from the 138kV Ramapo Substation, owned by O&R, to the 345kV Ramapo Substation, owned by Con Edison. This Agreement is one of three separate interconnection agreements⁴ necessary for the construction and operation of the second 345 kV Ramapo to Rock Tavern transmission line, which also will be interconnected to the Rock Tavern substation, which is owned by Central Hudson Gas & Electric Corp. (“Central Hudson”).

The New York State Public Service Commission (“NYPSC”), in its November 4, 2013 order,⁵ approved the second 345kV transmission line from the Ramapo Substation to Rock Tavern Substation, as one of the transmission projects that should be constructed as part of the NYPSC’s Indian Point Contingency Plan. The transmission line was initially proposed as one of the alternatives to maintain reliability should the Indian Point Nuclear Generating Facility’s (“Indian Point”) nuclear license not be renewed. In addition, the NYPSC states in its November 4th order that this project is beneficial to the state regardless of the outcome of the nuclear re-licensing.⁶

Con Edison will, at its sole expense, design and construct the reconnection of O&R’s transmission line into the 345kV Ramapo Substation. The reconnection of the transmission line into the Ramapo Substation will require the construction of System Upgrade Facilities (“SUFs”) within the Ramapo substation. In addition, the reconnection of O&R’s transmission line will also require the design and construction of SUFs at the Sugarloaf Substation that is owned by O&R. Con Edison will also design, procure and construct these SUFs and be responsible for the cost of the interconnection facilities, including the future operating and maintenance costs of the SUFs and attachment

³ *Consolidated Edison Company of New York, Inc.*, 119 FERC ¶ 61,206 (2007); *Consolidated Edison Company of New York, Inc.*, Docket No. ER09-1515-000, Letter Order dated September 3, 2009; *Niagara Mohawk Power Corporation*, 121 FERC ¶ 61,183 (2007).

⁴ One agreement covers the interconnection of the Con Edison 345 kV transmission line into the Rock Tavern Substation that is owned by Central Hudson. That interconnection agreement between Con Edison and Central Hudson has been filed with and accepted by the Commission in Docket Number ER15-1422. The other agreement involves the interconnection of the Con Edison owned segment of the transmission line to flex links within the Sugarloaf Substation owned by O&R. This second interconnection between Con Edison and O&R will be filed with the Commission shortly.

⁵ Case 12-E-0503, *Proceeding on Motion of the Commission to Review Generation Retirement Contingency Plans*, Order Accepting Reliability Contingency Plans, Establishing Cost Allocation and Recovery, and Denying Requests for Rehearing (November 4, 2013).

⁶ *Id.* at p. 32.

facilities. Once constructed, the new transmission line will become part of New York State transmission system and will be available for open access transmission service by the NYISO.

III. REQUEST FOR CEII TREATMENT

Pursuant to the Commission's regulations at 18 C.F.R. §388.112 and 18 C.F.R. § 388.113, Con Edison requests that the one-line diagram included as part of Appendix A to the Agreement (Figure A-1) be protected from disclosure as Critical Energy Infrastructure Information ("CEII"). This one-line diagram contains one-line schematics of transmission lines and the Ramapo Substation which, if disclosed, could pose a threat to the security and the reliability of the New York State bulk power system. This diagram provides more than simply the general location of critical infrastructure. Unlike publicly available maps of power transmission lines and generation and substation facilities, this schematic shows the exact nature and specific location of facilities and transmission lines used to maintain the reliability of the New York State bulk power system. The drawings reveal critical information related to the facilities and transmission depicted therein that, if disclosed, could be useful to a person seeking to disable the power grid. Therefore, the disclosure of this CEII diagram would pose a threat to the reliability of the New York State bulk power system and to the health and safety of New York residents. Moreover, the information in these schematics contain CEII that FERC has determined to be exempt from mandatory disclosure under 5 U.S.C. § 552(b) (7) (F). The diagram has been omitted from the Public version of the Interconnection Agreement included in this filing. The diagram is included only in the CEII version of the Interconnection Agreement in the filing.

All communications relating to this request for CEII treatment should be addressed to the following:

For Con Edison:

John Beck
Section Manager
Consolidated Edison Company
of New York, Inc.
4 Irving Place, Room 13-NW
New York, NY 10003
Phone: (212) 460-4244
Fax: (212) 529-1130

Paul A. Savage
Associate Counsel
Consolidated Edison Company
of New York, Inc.
4 Irving Place, Room 1815-S
New York, NY 10003
Phone: (212) 460-2764
Fax: (212) 529-9265

For O&R:

John Coffey
Chief Transmission and Substation Engineer
Orange & Rockland Utilities, Inc.
Address 390 West Route 59
Dept. SVOC
Spring Valley NY 10977
Phone: (845) 577-3704
Fax: (845) 577-3720

John Carley
Assistant General Counsel
Consolidated Edison Company
of New York, Inc.
4 Irving Place, Room 1815-S
New York, NY 10003
Phone: (212) 460-2097
Fax: (212) 677-5850

IV. EFFECTIVE DATE

Con Edison and O&R request that the Commission permit the Agreement to become effective as of June 4, 2015. The Commission has waived the 60-day notice requirement, partially or entirely, with respect to other interconnection agreements where circumstances warrant. A waiver in this case would serve the public interest by providing certainty with regard to investments and facilities that Con Edison must make to complete this Transmission Project. Accordingly, O&R and Con Edison request that the Commission grant a waiver of its prior notice requirements to the extent necessary to accommodate the requested effective date.

V. COMMUNICATIONS AND CORRESPONDENCE

Communications regarding this filing should be directed to:

For O&R:

John Carley
Assistant General Counsel
Consolidated Edison Company
of New York, Inc.
4 Irving Place, Room 1815-S
New York, NY 10003
Phone: (212) 460-2097
Fax: (212) 677-5850

For Con Edison:

Paul A. Savage
Associate Counsel
Consolidated Edison Company
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4 Irving Place, Room 1815-S
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Phone: (212) 460-2764
Fax: (212) 529-9265

VI. DOCUMENTS SUBMITTED

This filing consists of the following documents:

- A. this filing letter;
- B. a Public version of the Agreement; and
- C. a CEII version of the Agreement.

VII. SERVICE

Con Edison will serve this filing electronically on the NYPSC, the NYISO, and O&R.

VIII. CONCLUSION

Wherefore, Con Edison and O&R respectfully request that the Commission accept the attached Agreement effective as of June 4, 2015.

Respectfully submitted,

By: 

Vice President
Consolidated Edison Company of New York, Inc.