



Paul Savage
Associate Counsel
Regulatory Services

March 27, 2020

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 Orange and Rockland Utilities, Inc. and Consolidated Edison Company of New York, Inc., Docket No. ER20-____-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. 2515, between O&R and Con Edison (collectively, the "Parties").

Con Edison and O&R request a March 30, 2020 effective date for the Agreement and further request a waiver of the normal 60-day notice period, as discussed 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

Con Edison and O&R jointly own a transmission line known as “Y-88.”⁴ This transmission line connects the Buchanan South Substation to the Ladentown Substation. In order to resolve certain reliability concerns on the O&R transmission system, O&R proposes to construct a new 345kV transmission substation to be known as the “Lovett Substation” that will be located between the Buchanan South Substation and the Ladentown Substation. Y-88 will be cut so that the portion of Y-88 from the Buchanan South Substation to the Lovett Substation will remain designated s Y-88. The portion of Y-88 from the Lovett Substation to the Ladentown Substation will be designated as “Y-66.”⁵ The point of interconnection and the point of change of ownership for both Y-66 and the re-designated Y-88, will be points on the transmission line where an overhead conductor cable jumper on first transmission pole outside the Lovett Substation is connected.

O&R will be responsible for all transmission system upgrade facility (“SUF”) costs needed to interconnect Y-66 and the redesignated Y-88, as this project is being implemented to resolve a reliability concern on the O&R transmission system. The SUFs include relay protection and communication equipment to be located in the Buchanan South, Ladentown, and Lovett Substations. O&R will be responsible for the operating and maintenance (“O&M”) costs associated with the SUFs located in the Lovett Substation, as it will be the owner of this substation. Con Edison is the owner of the Buchanan South Substation and will be responsible for the O&M costs at this substation. Because the Ladentown Substation is jointly owned by Con Edison and O&R, the O&M costs for this substation will be shared according to the terms of the Ladentown Switching Station Agreement, dated as of January 11, 1974. Y-88 and Y-66 will both become part of New York State transmission system and will be available for open access transmission service by the NYISO.

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 Transmission line Y-88 is owned 100% by Con Edison from Buchanan South to mid-Hudson River. Con Edison owns 85% of the line from mid-Hudson River to Lovett Substation. O&R owns the remaining 15% from the middle of the Hudson River to the Lovett Substation.

⁵ Con Edison will own 85% and Con Edison will own 85% of Y-66 from Lovett Substation to Ladentown Substation. O&R will own 15% of Y-66 from Lovett Substation to Ladentown Substation

II. EFFECTIVE DATE

Con Edison and O&R request that the Commission permit the Agreement to become effective as of March 30, 2020. 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 O&R must make to complete this reliability 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.

III. COMMUNICATIONS AND CORRESPONDENCE

Communications regarding this filing should be directed to:

For O&R:

John Carley
Associate General Counsel
Consolidated Edison Company
of New York, Inc.
4 Irving Place, Room 18-813
New York, NY 10003
Phone: (212) 460-2097
Fax: (212) 677-5850
carleyj@coned.com

For Con Edison:

Paul A. Savage
Associate Counsel
Consolidated Edison Company
Of New York, Inc.
4 Irving Place, Room 18-834
New York, NY 10003
Phone: (212) 460-2764
Fax: (212) 529-9625
savagep@coned.com

IV. DOCUMENTS SUBMITTED

This filing consists of the following documents:

- A. this filing letter;
- B. a public version of the Agreement (Attachment I); and
- C. the Agreement signature page (Attachment II).

V. SERVICE

Con Edison will serve this filing electronically on the New York State Public Service Commission, the NYISO, and O&R.

VI. CONCLUSION

Wherefore, Con Edison and O&R respectfully request that the Commission accept the attached Agreement effective as of March 30, 2020.

Respectfully submitted,

/s/ Paul A. Savage

Paul A. Savage
Associate Counsel
Consolidated Edison Company of New
York, Inc.