

October 19, 2012

By Electronic Delivery

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

Re: Filing of an Executed Large Generator Interconnection Agreement Among the New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and Allegany Wind, LLC and Request for Waiver of the 60-Day Notice Period, Docket No. ER13-____-000

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act¹ and Section 35.12 of the Commission's Regulations,² the New York Independent System Operator, Inc. ("NYISO") and Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid") (collectively, the "Joint Filing Parties") hereby tender for filing an executed Large Generator Interconnection Agreement ("Interconnection Agreement") as Service Agreement No. 1916 among the NYISO, National Grid as the Transmission Owner, and Allegany Wind, LLC ("Allegany") as the Developer.³

With the limited exceptions noted in Section II of this letter, the Interconnection Agreement conforms to the NYISO's *pro forma* Large Generator Interconnection Agreement ("LGIA") that is contained in Attachment X of the NYISO's OATT. The Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing. Further, as described in Part III of this letter, the Joint Filing Parties respectfully request a waiver of the Commission's prior notice requirements to make the Interconnection Agreement effective as of October 5, 2012.

I. Background

The Interconnection Agreement governs the interconnection of Allegany's Large Generating Facility ("Facility") in the Town of Olean, Cattaraugus County, New York. The Facility is a 72.5 MW wind power facility that employs twenty-nine (29) Nordex N90, 2.5 MW

¹ 16 U.S.C. § 824d (2011).

² 18 C.F.R. § 35.12 (2011).

³ Capitalized terms not otherwise defined in this letter have the meaning set forth in Attachments S and X of the NYISO's Open Access Transmission Tariff ("OATT").

wind turbines. The Facility will interconnect to National Grid's Homer Hill-Dugan Road #155 115 kV transmission line. The Point of Interconnection is approximately two (2) miles from National Grid's Homer Hill Substation. The Point of Interconnection is identified in Appendix A of the Interconnection Agreement at Figure 1.

II. Variations From the NYISO's Pro Forma LGIA

As noted above, the Interconnection Agreement is based on the NYISO's *pro forma* LGIA; however, the parties have agreed to make one (1) substantive modification to the *pro forma* LGIA as well as ministerial formatting modifications.

Specifically, the parties have agreed to modify an outdated reference in Section 9.6.3 of the Interconnection Agreement. The NYISO's *pro forma* LGIA references "NPCC criteria A-3." The applicable NPCC criteria are now found in "NPCC Regional Reliability Reference Directory # 12." This single modification to the *pro forma* LGIA is among modifications previously accepted by the Commission.⁴

All of the parties to the Interconnection Agreement ("Parties") agree to this change. The Joint Filing Parties have included a blackline of the Interconnection Agreement against the NYISO's *pro forma* LGIA to highlight this change. The NYISO respectfully requests that the Commission accept this modification.

III. Proposed Effective Date and Request for Wavier of the 60-Day Notice Period

The Joint Filing Parties request an effective date of October 5, 2012 for the Interconnection Agreement, which is the date of execution. The Joint Filing Parties respectfully request that the Commission waive its prior notice requirement in order to permit the requested effective date. The Commission has previously permitted interconnection agreements to become effective upon the date of execution.⁵

IV. Communications and Correspondence

Communications regarding this filing should be directed to:

⁴ See, e.g., *New York Independent System Operator, Inc. and Consolidated Edison Company of New York, Inc.*, 135 FERC ¶ 61,264 (Jun. 28, 2011); *New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and New York State Electric & Gas Corporation*, Docket No. ER11-4621-000 (Nov. 4, 2011) .

⁵ See, e.g., *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Docket No. ER11-2953-000 (April 7, 2011) (accepting interconnection agreement effective as of date of execution); see also *New York Independent System Operator, Inc. and Niagara Mohawk Power Corp., Letter Order*, Docket No. ER08-985-000 (June 26, 2008) (same); *New York Independent System Operator, Inc. and New York Power Authority, Letter Order*, Docket No. ER08-861-000 (May 27, 2008) (same); *New York Independent System Operator, Inc. and New York Power Authority, Letter Order*, Docket No. ER08-699-000 (May 16, 2008) (same).

For the NYISO

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*Designated to receive service.

V. Documents Submitted

The NYISO submits the following documents:

- this filing letter;
- a clean version of the Interconnection Agreement (Attachment I); and
- a blacklined version showing the changes between the *pro forma* LGIA and the Interconnection Agreement (Attachment II).

VI. Service

The NYISO will send an electronic link to this filing to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, a complete copy of the Public documents included with this filing will be posted on the NYISO's website at www.nyiso.com.

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VII. Conclusion

Wherefore, the NYISO respectfully requests that the Commission accept the Interconnection Agreement effective as of October 5, 2012.

Respectfully submitted,

/s/ Sara B. Keegan

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New York Independent System Operator, Inc.

/s/Amanda C. Downey

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