

January 27, 2025

By Electronic Delivery

Honorable Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Joint Filing of an Executed Large Generator Interconnection Agreement for the South Ripley Solar and Battery Storage Project (NYISO Queue Position No. 783) Among the New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and ConnectGen Chautauqua County LLC; Request for Waiver of the 60-Day Notice Period; Docket No. ER25-____-000

Dear Ms. Reese:

Pursuant to Section 205 of the Federal Power Act¹ and Section 35.13 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") (together, the "Joint Filing Parties") hereby tender for filing an executed Large Generator Interconnection Agreement for the South Ripley Solar and Battery Storage Project (NYISO Queue No. 783) entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and ConnectGen Chautauqua County LLC ("ConnectGen"), as the Developer (the "Developer").³ The Interconnection Agreement is labeled as Service Agreement No. 2877 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing. With the limited exception described in Part I of this letter, the Interconnection Agreement conforms to the NYISO's *pro forma* Large Generator Interconnection Agreement ("Pro Forma LGIA") that is contained in Attachment X to the OATT. Further, as described in Part II of this letter, the Joint Filing Parties respectfully request a waiver of the Commission's prior notice requirements⁴ to make the Interconnection Agreement effective as of January 10, 2025, which is the date of its full execution.

¹ 16 U.S.C. § 824d.

² 18 C.F.R. § 35.13 (2024).

³ Capitalized terms that are not otherwise defined in this filing letter shall have the meaning specified in Attachments S, X, or Z of the NYISO OATT, and if not defined therein, in the NYISO OATT and NYISO Market Administration and Control Area Services Tariff.

⁴ See *Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139, clarified, 65 FERC ¶ 61,081 (1993).

I. Discussion

A. Background

ConnectGen is constructing a 270 MW solar generating facility that is co-located with a 20 MW/80 MWh battery storage facility in the town of Ripley, New York (the “Facility”). Additional details regarding the Facility can be found in Appendix C of the Interconnection Agreement.

The Facility will interconnect to certain facilities of National Grid that are part of the New York State Transmission System. The Point of Interconnection is National Grid’s existing 230 kV South Ripley Substation. Appendix A of the Interconnection Agreement includes a one-line diagram showing the Point of Interconnection.

B. **The Interconnection Agreement Closely Conforms to the Pro Forma LGIA Contained in Attachment X of the NYISO OATT**

The Interconnection Agreement was fully executed on January 10, 2025, by the NYISO, National Grid, and ConnectGen. The Interconnection Agreement largely conforms to the language in the Pro Forma LGIA contained in Attachment X of the NYISO OATT with the exception described below in this Part I.B.⁵ The Joint Filing Parties submit that the change specified below satisfies the Commission’s standard for variations from the Pro Forma LGIA, because unique circumstances exist that require a non-conforming agreement.⁶ Therefore, the

⁵ The NYISO submitted a revised version of its Pro Forma LGIA in Attachment X of its OATT with the Commission on May 1, 2024, in Docket No. ER24-1915-000 as part of the NYISO’s compliance with Order Nos. 2023 and 2023-A with a requested effective date of May 2, 2024. The NYISO’s compliance filing is currently pending with the Commission. Consistent with its requested effective date, the NYISO used the updated Pro Forma LGIA form for this Interconnection Agreement. The NYISO specifically addressed the potential timing issue with its proposed updates to its Pro Forma LGIA. Specifically, Section 29.16 of the updated Pro Forma LGIA and the Interconnection Agreement provides that if the Commission directs that the NYISO modify the Pro Forma LGIA as part of the Order No. 2023 compliance proceeding, the parties agree to amend the agreement to address these modifications. That is, if the Commission were not to accept the compliance modifications to the Pro Forma LGIA in the Order No. 2023 proceeding, the parties will amend this agreement to conform it with the agreement accepted by the Commission. The Commission has previously accepted agreements using pending *pro forma* forms that were subject to amendment based on the Commission’s determination. See *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER6-1785-000 (July 19, 2016) (accepting filed operating agreement using a *pro forma* form that was still pending at the Commission, which agreement provided for parties to amend the agreement to incorporate any modifications to the underlying *pro forma* form directed by the Commission). If the Commission determines that the modifications to the updated Pro Forma LGIA that were submitted with the Order No. 2023 compliance filing and included in the Interconnection Agreement should instead be considered non-conforming revisions for purposes of this Interconnection Agreement, the NYISO requests that the Commission accept such changes due to the unique timing circumstances that require the non-conforming changes.

⁶ See, e.g., *PJM Interconnection, LLC*, 111 FERC ¶ 61,163 at PP 10-11, *reh’g denied*, 112 FERC ¶ 61,282 (2005).

Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement with the non-conforming change.

1. Specification of Interconnection Service Rights for Co-Located Storage Resource

Pursuant to the NYISO's interconnection procedures, a Developer may submit a single Interconnection Request for a Co-located Resource ("CSR") that includes two Generators – an intermittent resource and an energy storage resource that are both located behind the same Point of Interconnection.⁷ The NYISO studies the interconnection of the Generators together as a single Facility under the interconnection procedures – a single CSR project that will have a single interconnection agreement. However, the Energy Resource Interconnection Services ("ERIS") rights⁸ and Capacity Resource Interconnection Services ("CRIS") rights⁹ are allocated to each generating facility in the CSR separately. ConnectGen's Facility is a CSR that includes both a 270 MW solar generating facility and a 20 MW battery storage facility. In the NYISO's Class Year Interconnection Facilities Study for Class Year 2021, the Facility received a total ERIS amount of 270 MW for the CSR (with 270 MW for the solar generating facility and 20 MW for the battery storage facility) and a total CRIS amount of 270 MW (with 250 MW for the solar facility and 20 MW for the battery storage facility).

Article 4.1.1 of the Pro Forma LGIA provides that the NYISO will provide ERIS and CRIS to the Developer at the Point of Interconnection. The parties agreed to modify this provision to provide for detailing in Appendix C both the total ERIS and CRIS values for the CSR as a whole and the ERIS and CRIS values for the individual generating units that make up the CSR. These requirements, including the injection limitation at the Point of Interconnection, are set forth in Section 2 and Section 3.b of Appendix C of the Interconnection Agreement.

⁷ See *New York Independent System Operator, Inc.*, Proposed Tariff Revisions to Implement Co-located Storage Resources, Docket No. ER21-1001-000 (January 29, 2021); see also *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER21-1001-000 (March 30, 2021) (accepting the NYISO's Co-located Storage Resources tariff revisions).

⁸ ERIS is basic interconnection service that allows a Developer to interconnect its generating facility to the New York State Transmission System or Distribution System in accordance with the NYISO Minimum Interconnection Standard to enable the New York State Transmission System or Distribution System to receive electric energy from the facility.

⁹ If a Developer wants its proposed project to qualify as an Installed Capacity Supplier and to participate in the NYISO-administered Installed Capacity market, the Developer must also obtain CRIS. CRIS is interconnection service that allows a Developer to interconnect its Project to the New York State Transmission System or Distribution System in accordance with the NYISO Deliverability Interconnection Standard, which allows participation in the NYISO's Installed Capacity market to the extent of the project's deliverable capacity.

II. Proposed Effective Date and Request for Waiver of the 60-Day Notice Period

The Joint Filing Parties request an effective date of January 10, 2025, for the Interconnection Agreement, which is the date of its full execution. The Joint Filing Parties respectfully request that the Commission waive its prior notice requirement to permit the requested effective date. The Commission has previously permitted interconnection agreements to become effective upon the date of execution.¹⁰

III. Communications and Correspondence

All communications and service in this proceeding should be directed to:

For the NYISO¹¹

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¹⁰ See, e.g., *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Letter Order, Docket No. ER11-2953-000 (Apr. 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).

¹¹ The NYISO respectfully requests waiver of 18 C.F.R. § 385.203(b)(3) (2024) to permit service on counsel in both Washington, D.C. and Richmond, VA.

For Niagara Mohawk Power Corporation d/b/a National Grid

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IV. Documents Submitted

The Joint Filing Parties submit the following documents with this filing letter:

- A clean version of the Interconnection Agreement (Attachment I);
- A blacklined version of the Interconnection Agreement showing the changes from the Pro Forma LGIA (Attachment II); and
- The signature pages for the Interconnection Agreement (Attachment III).

V. Service

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

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VI. Conclusion

Wherefore, the Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing with an effective date of January 10, 2025.

Respectfully submitted,

/s/ Sara B. Keegan

Sara B. Keegan

Counsel for the

New York Independent System Operator, Inc.

/s/ Christopher J. Novak

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