

June 13, 2025

By Electronic Delivery

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

Re: Notice of Cancellation of Service Agreement No. 2847 to the New York
Independent System Operator, Inc.'s Open Access Transmission Tariff, Docket
No. ER25-_____

Dear Ms. Reese:

Pursuant to Section 205(d) of the Federal Power Act¹ and Sections 35.9 and 35.15 of the Federal Energy Regulatory Commission's ("Commission's") regulations,² the New York Independent System Operator, Inc. ("NYISO") hereby tenders for filing and acceptance a Notice of Cancellation of the Large Generator Interconnection Agreement ("Interconnection Agreement") for the Yaphank Energy Storage project (NYISO Queue Position No. 965) among the NYISO, Long Island Lighting Company d/b/a LIPA ("LIPA"),³ as the Connecting Transmission Owner, and Yaphank Energy Storage, LLC ("Yaphank") as the Developer (collectively, the "Parties"). The Interconnection Agreement is designated as Service Agreement No. 2847 of the NYISO's Open Access Transmission Tariff ("OATT"). LIPA and Yaphank have indicated to the NYISO that neither party opposes this filing.

I. Background

The Interconnection Agreement was fully executed by the Parties on May 31, 2024. The Interconnection Agreement addressed the proposed interconnection of Yaphank's 76.86 MW energy storage project to LIPA's transmission system. The executed Interconnection Agreement included certain non-conforming revisions to the NYISO's *pro forma* Large Generator Interconnection Agreement located in Attachment X of the NYISO OATT and was filed with, and accepted by, the Commission.⁴

II. Notice of Cancellation

Article 2.3.1 of the Interconnection Agreement provides that the agreement "may be terminated by the Developer after giving the NYISO and Connecting Transmission Owner ninety

¹ 16 U.S.C. § 824d.

² 18 C.F.R. §§ 35.9, 35.15 (2025).

³ Long Island Lighting Company d/b/a LIPA is a subsidiary of the Long Island Power Authority, which is an instrumentality and political subdivision of the State of New York, and is a non-jurisdictional utility pursuant to Section 201(f) of the Federal Power Act.

⁴ *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER24-2278-000 (Aug. 13, 2024).

(90) Calendar Days advance written notice.” Article 2.3.3 further provides that the termination of the agreement will not be effective “until the Parties have complied with all Applicable Laws and Regulations applicable to such termination, including the filing with FERC of a notice of termination of this Agreement, which notice has been accepted for filing by FERC.”

On March 3, 2025, Yaphank provided written notice to the NYISO and LIPA that it was acting pursuant to Article 2.3.1 to terminate the Interconnection Agreement (“Termination Notice”). This ninety-day period was completed on June 1, 2025. The parties have confirmed that there are no remaining obligations under the Interconnection Agreement. Notwithstanding the termination of the Interconnection Agreement, Yaphank remains subject to the Security forfeiture rules set forth in Section 40.16.1.1.1 of Attachment HH to the NYISO OATT concerning the Security that Yaphank provided to LIPA in connection with the System Deliverability Upgrades on LIPA’s system identified for Yaphank’s and other projects that are being relied on by certain other projects that participated with Yaphank in the NYISO’s Class Year Interconnection Facilities Study for Class Year 2021.⁵

Therefore, pursuant to Articles 2.3.1 and 2.3.3 of the Interconnection Agreement, the Interconnection Agreement is terminated, subject to the Commission accepting this notice terminating the agreement. Accordingly, the NYISO hereby submits this Notice of Cancellation of Service Agreement No. 2847 of the NYISO OATT for the Commission’s acceptance.

III. Requested Effective Date

The NYISO respectfully requests that the proposed cancellation become effective on August 13, 2025 (*i.e.*, the day after the end of the statutory 60-day notice period).

IV. Documents Submitted

The NYISO submits the following document with this filing letter:

- Yaphank’s March 3, 2025 Termination Notice (Attachment I).

V. Communications and Correspondence

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

⁵ The NYISO’s Class Year Deliverability Study and Additional SDU Study for Class Year 2021 determined that certain shared System Deliverability Upgrades were required for Yaphank’s project and for certain other Class Year 2021 projects for them to receive Capacity Resource Interconnection Service. Pursuant to the NYISO’s tariff requirements for its Class Year Interconnection Facilities Study, Yaphank accepted, and provided Security to LIPA to cover, its portion of the estimated costs of these System Deliverability Upgrades. The NYISO subsequently accepted as non material certain modifications to these System Deliverability Upgrades. The construction of the System Deliverability Upgrades, including the requirements for LIPA’s use of the Security provided by Yaphank that is subject to forfeiture in accordance with the NYISO’s tariff requirements, will be reflected in a separate Engineering, Procurement, and Construction Agreement by and among the NYISO, LIPA, and the developers of the other impacted Class Year 2021 projects.

For the NYISO

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VI. 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.

VII. Conclusion

Wherefore, the NYISO respectfully requests that the Commission accept this Notice of Cancellation.

Respectfully submitted,

/s/ Sara B. Keegan

Sara B. Keegan, Assistant General Counsel
New York Independent System Operator, Inc.

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