

October 14, 2025

By Electronic Delivery

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

Re: Joint Filing of an Executed Standard Interconnection Agreement for the East Fishkill Battery Energy Storage project (Queue Position No. 1122) among the New York Independent System Operator, Inc., Central Hudson Gas & Electric Corporation, and East Fishkill Storage 1, LLC; and Request for Waiver of the 60-Day Notice Period; Docket No. ER26-____-000

Dear Ms. Reese:

Pursuant to Section 205 of the Federal Power Act¹ and Section 35.13 of the Federal Energy Regulatory Commission's (the "Commission") regulations,² the New York Independent System Operator, Inc. ("NYISO") and Central Hudson Gas & Electric Corporation ("Central Hudson") (together, the "Joint Filing Parties") hereby tender for filing an executed Standard Interconnection Agreement for the East Fishkill Battery Energy Storage project (NYISO Queue Position No. 1122) among the NYISO, Central Hudson, as the Connecting Transmission Owner, and East Fishkill Storage 1, LLC ("East Fishkill"), as the Interconnection Customer (the "Agreement").³ The Agreement is labeled as Service Agreement No. 2920 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Agreement for filing. With the limited exception described in Part II of this letter, the Agreement conforms to the NYISO's *pro forma* Standard Interconnection Agreement ("Pro Forma IA") that is contained in Attachment HH of the OATT. Further, as described in Part III of this letter, the Joint Filing Parties respectfully request a waiver of the Commission's prior notice requirements⁴ to make the Agreement effective as of October 1, 2025, which is the date of its execution.

¹ 16 U.S.C. § 824d.

² 18 C.F.R. § 35.13 (2025).

³ Capitalized terms that are not otherwise defined in this filing letter shall have the meaning specified in Attachments S, X, or HH of the OATT, and if not defined therein, in the 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. Background

East Fishkill is constructing a 205 MW battery energy storage facility to be located in Dutchess County, New York (the “Facility”). Additional details regarding the Facility can be found in Appendix A of the Agreement. The Facility will interconnect to certain facilities of Central Hudson that are part of the New York State Transmission System. The Point of Interconnection will be at Central Hudson’s existing 115 kV Shenandoah Substation. Figure A-1 of the Agreement includes a one-line diagram showing the Point of Interconnection.

II. The Agreement Closely Conforms to the Pro Forma IA Contained in Attachment HH of the OATT

The Agreement was fully executed on October 1, 2025, by the NYISO, Central Hudson, and East Fishkill. The Agreement closely follows the language in the Pro Forma IA contained in Attachment HH of the OATT. However, the Agreement does contain a variation from the Pro Forma IA that is described in this Part II. The Joint Filing Parties submit that the change specified below satisfies the Commission’s standard for variations from the Pro Forma IA because unique circumstances exist that require a non-conforming agreement.⁵ Therefore, the Joint Filing Parties respectfully request that the Commission accept this limited non-conforming change.

A. Modifications to Address Phasor Measurement Unit Requirements

Article 9.10 of the Pro Forma IA requires Interconnection Customers to install, at their expense, a phasor measurement unit (“PMU”) on the low side of the step-up transformer, along with related PMU equipment, and to collect and transmit PMU data to the NYISO and to the Connecting Transmission Owner. The NYISO introduced the PMU requirements in its interconnection agreements in 2017 to enhance the NYISO’s ability to monitor the transmission grid for the New York Control Area and to determine real-time grid stability margins.⁶

The PMU requirements provide that the Interconnection Customer must transmit the PMU data via the Connecting Transmission Owner’s system. Central Hudson, however, does not currently possess the capability to obtain the data from East Fishkill or to transmit the data to the NYISO, and the NYISO is unable at this time to accept PMU data directly from East Fishkill. The parties therefore agreed to reserve Article 9.10 and not apply the PMU requirements to the

⁵ See, e.g., *PJM Interconnection, LLC*, 111 FERC ¶ 61,163 at PP 10-11, *reh’g denied*, 112 FERC ¶ 61,282 (2005).

⁶ See *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER18-80-000 (Dec. 7, 2017) (accepting NYISO’s tariff revisions to improve its interconnection process, including the insertion of PMU requirements in Article 9.10 of the NYISO’s *pro forma* Large Generator Interconnection Agreement).

Agreement. The Commission has previously accepted this change to NYISO's interconnection agreements.⁷

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

The Joint Filing Parties request an effective date of October 1, 2025, for the 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.⁸ The Commission has previously permitted interconnection agreements to become effective upon the date of execution.⁹

⁷ See, e.g., *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER24-814-000 (Mar. 1, 2024) (accepting non-conforming revisions to reserve phasor measurement unit requirements); *New York Independent System Operator, Inc., et al.*, Letter Order, Docket No. ER23-78-000 (Dec. 6, 2022) (same).

⁸ The Commission generally grants waiver of the 60-day prior notice requirement when a service agreement is submitted for filing within 30 days of the agreement's effective date. See Prior Notice Filing Requirements Under Part II of the Federal Power Act, 64 FERC ¶ 61,139 (1993).

⁹ 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 as requested by the parties); *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).

IV. Communications and Correspondence

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

For the NYISO¹⁰

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¹⁰ The NYISO respectfully requests waiver of 18 C.F.R. § 385.203(b)(3) (2025) to permit service on counsel in both Washington, D.C. and Richmond, VA.

V. Documents Submitted

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

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

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.

VIII. Conclusion

Wherefore, the Joint Filing Parties respectfully request that the Commission accept the Agreement for filing with an effective date of October 1, 2025.

Respectfully submitted,

s/ Sara B. Keegan

Sara B. Keegan
*Counsel for the
New York Independent System Operator, Inc.*

s/ Marina W. Chu

Marina W. Chu
*Counsel for Central Hudson Gas & Electric
Corporation*

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