

January 6, 2026

**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 Small Generator Interconnection Agreement for the ELP Granby Solar II Project (NYISO Queue Position No. 1329) Among the New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and ELP Granby Solar II LLC; Request for Waiver of the 60-Day Notice Period; Docket No. ER26-\_\_\_\_-000

Dear Ms. Reese:

Pursuant to Section 205 of the Federal Power Act<sup>1</sup> and Section 35.13 of the Commission's regulations,<sup>2</sup> 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 Small Generator Interconnection Agreement for the ELP Granby Solar II project (NYISO Queue No. 1329) entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and ELP Granby Solar II LLC ("ELP Granby II"), as the Interconnection Customer (the "Interconnection Agreement").<sup>3</sup> The Interconnection Agreement is labeled as Service Agreement No. 2934 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 exceptions described in Part I of this letter, the Interconnection Agreement conforms to the NYISO's *pro forma* Small Generator Interconnection Agreement ("Pro Forma SGIA") that is contained in Attachment Z 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 requirements<sup>4</sup> to make the Interconnection Agreement effective as of December 29, 2025, which is the date of its full execution.

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<sup>1</sup> 16 U.S.C. § 824d.

<sup>2</sup> 18 C.F.R. § 35.13 (2025).

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

<sup>4</sup> 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**

ELP Granby II is constructing a 20 MW Co-Located Storage Resource consisting of a 20 MW solar generating facility (“Solar Generating Facility”) and a 5 MW battery energy storage system (“BESS”) in Fulton, New York (collectively, the “Facility”). Additional details regarding the Facility can be found in Attachment 2 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 115 kV Curtis Street-Teall Line 13 between structures 153 and 154, approximately 5.3 miles from National Grid’s Curtis Street Substation and 23.5 miles from National Grid’s Teall Ave Substation. Attachment 3 of the Interconnection Agreement includes a one-line diagram showing the Point of Interconnection.

### **B. The Interconnection Agreement Closely Conforms to the Pro Forma SGIA Contained in Attachment Z of the NYISO OATT**

The Interconnection Agreement was fully executed on December 29, 2025, by the NYISO, National Grid, and ELP Granby II. The Interconnection Agreement largely conforms to the language in the Pro Forma SGIA with the exceptions described below in this Part I.B.<sup>5</sup> The Joint Filing Parties submit that the changes specified below satisfy the Commission’s standard for variations from the Pro Forma SGIA, because unique circumstances exist that require a non-conforming agreement.<sup>6</sup> Therefore, the Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement with the non-conforming changes.

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<sup>5</sup> ELP Granby II’s Facility participated in the NYISO’s Small Generator Interconnection Procedures in Attachment Z of the NYISO OATT. Pursuant to the transition rules of the NYISO’s new Standard Interconnection Procedures in Attachment HH of the OATT, the NYISO, National Grid, and ELP Granby II used the Standard Small Generator Interconnection Agreement located in Attachment Z of the OATT for this Small Generating Facility project. NYISO OATT Attach. HH § 40.3.1.2 (“For a Class Year Project for Class Year 2021 or prior Class Years or a Small Generating Facility for which the ISO is negotiating with the Interconnection Customer, Connecting Transmission Owner, Affected System Operator, and/or Affected Transmission Owner, as applicable, an interconnection agreement and/or Engineering, Procurement, or Construction Agreement(s) as of the effective date of the Standard Interconnection Procedures, the parties shall continue to negotiate, as applicable, the Standard Large Generator Interconnection Agreement, Small Generator Interconnection Agreement, and/or Engineering, Procurement, or Construction Agreement pursuant to the terms and forms set forth, as applicable, in Attachment X or Attachment Z to the ISO OATT.”).

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

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

Pursuant to the NYISO's interconnection procedures, an Interconnection Customer may submit a single Interconnection Request for a Co-located Storage Resource ("CSR") that includes two Generators – an intermittent resource and an energy storage resource that are both located behind the same Point of Interconnection.<sup>7</sup> 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") rights<sup>8</sup> and Capacity Resource Interconnection Services ("CRIS") rights<sup>9</sup> are allocated to each generating facility in the CSR separately.

Article 1.3.1 of the Pro Forma SGIA provides that the NYISO will provide ERIS and CRIS to the Interconnection Customer at the Point of Interconnection. As ELP Granby II's Facility is a CSR, the parties agreed to modify this provision to provide for detailing in Section 1 of Attachment 5 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 1 of Attachment 5 of the Interconnection Agreement.

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<sup>7</sup> 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. ER 21-1001-000 (March 30, 2021) (accepting the NYISO's Co-located Storage Resources tariff revisions).

<sup>8</sup> ERIS is basic interconnection service that allows an Interconnection Customer 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.

<sup>9</sup> If an Interconnection Customer wants its proposed project to qualify as an Installed Capacity Supplier and to participate in the NYISO-administered Installed Capacity market, the Interconnection Customer must also obtain CRIS. CRIS is interconnection service that allows an Interconnection Customer 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.

## **2. ELP Granby II's Construction of Portions of the Connecting Transmission Owner's Interconnection Facilities**

Article 1.5.3 of the Pro Forma SGIA provides that the Connecting Transmission Owner shall construct, operate, and maintain its Interconnection Facilities covered by the agreement. National Grid and ELP Granby II have agreed that ELP Granby II will be responsible for constructing certain Connecting Transmission Owner's Interconnection Facilities associated with the Facility. Accordingly, the parties agreed to modify Article 1.5.3 of the Interconnection Agreement to clarify that the Interconnection Customer, ELP Granby II, can construct the Connecting Transmission Owner's Interconnection Facilities and upgrades with the agreement of the parties. The Commission has previously accepted this change to the Pro Forma SGIA.<sup>10</sup>

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

The Joint Filing Parties request an effective date of December 29, 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.<sup>11</sup> The Commission has previously permitted interconnection agreements to become effective upon the date of execution.<sup>12</sup>

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<sup>10</sup> See *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Letter Order, Docket No. ER20-1603-000 (June 18, 2020) (accepting interconnection agreement modified to permit the Interconnection Customer to agree to construct Connecting Transmission Owner's Interconnection Facilities); *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Letter Order, Docket No. ER20-1602-000 (June 18, 2020) (same); *New York Independent System Operator, Inc. and Niagara Mohawk Power Corp.*, Letter Order, Docket No. ER22-2627-000 (Sept. 21, 2022) (same).

<sup>11</sup> 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).

<sup>12</sup> 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).

**III. Communications and Correspondence**

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

**For the NYISO<sup>13</sup>**

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<sup>13</sup> 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.

**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 SGIA (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](http://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.

**VI. Conclusion**

Wherefore, the Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing with an effective date of December 29, 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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