

THIS FILING LETTER DOES NOT CONTAIN ANY CEII. ATTACHMENTS I, II, and IV DO NOT CONTAIN ANY PRIVILEGED OR CONFIDENTIAL INFORMATION. ATTACHMENT III INCLUDES DIAGRAMS FOR WHICH CEII DESIGNATION IS REQUESTED IN PART IV BELOW, AND IS SUBMITTED SEPARATELY.

January 29, 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 Amended and Restated Standard Large Generator Interconnection Agreement for the Gateway Solar Energy Center Project (Queue Position No. 620) Among the New York Independent System Operator, Inc., the New York Power Authority, and Gateway Solar Energy Center, LLC; Request for Critical Energy Infrastructure Information Designation; 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 Commission's regulations,² the New York Independent System Operator, Inc. ("NYISO") and the New York Power Authority ("NYPA") (together, the "Joint Filing Parties") hereby tender for filing an executed Amended and Restated Standard Large Generator Interconnection Agreement for the Gateway Solar Energy Center project (NYISO Queue Position No. 620) among the NYISO, NYPA, as the Connecting Transmission Owner, and Gateway Solar Energy Center, LLC ("Gateway"), as the Developer (the "Amended Agreement").³ The Amended Agreement is labeled as Service Agreement No. 2739 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Amended Agreement for filing. The Amended Agreement conforms to the NYISO's *pro forma* Large Generator Interconnection Agreement ("Pro Forma LGIA") that is contained in Attachment X to the OATT with limited non-conforming exceptions previously accepted by the Commission for the prior version of this agreement. Further, as described in Part II of this letter, the Joint Filing

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.

Parties respectfully request a waiver of the Commission's prior notice requirements⁴ to make the Amended Agreement effective as of January 14, 2026, which is the date of its execution. Finally, as described in Part III of this letter, NYPA requests that the diagrams included in the Amended Agreement be protected from disclosure as Critical Energy Infrastructure Information ("CEII").

I. Discussion

Gateway is constructing a 180 MW photovoltaic solar powered facility to be located in Massena, St. Lawrence County, New York (the "Facility"). The Facility will interconnect to certain facilities of NYPA that are part of the New York State Transmission System. The Amended Agreement supersedes the Large Generator Interconnection Agreement among the NYISO, NYPA, and Gateway that was filed in the Commission's Docket No. ER23-455-000 on November 17, 2022, and was accepted by the Commission on January 4, 2023 (the "Original Agreement").⁵ The Original Agreement was based on and is consistent with the Pro Forma LGIA, but included certain non-conforming modifications, which the Commission accepted.

Subsequent to the effective date of the Original Agreement, Gateway proposed to update its Commercial Operation Date ("COD"), which the NYISO determined was not material. Accordingly, the NYISO, NYPA, and Gateway have revised Appendix B of the Original Agreement to reflect the revised COD and the related updates to milestone dates. The parties also agreed to the following revisions to the Original Agreement:

- updated the project name from North Side Solar to Gateway Solar Energy Center;
- updated the Interconnection Customer name from North Side Energy Center, LLC to Gateway Solar Energy Center, LLC;
- updated NYPA's estimated amount for oversight costs in Article 5.2.13;
- updated the description of certain System Upgrade Facilities in Appendix A;
- updated the cost estimate in Appendix A pursuant to Section 40.6.3.5 of Attachment HH to the NYISO OATT in connection with the COD extension;⁶

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).

⁵ *New York Independent System Operator, Inc. and New York Power Authority*, Letter Order, Docket No. ER23-455-000 (Jan. 4, 2023).

⁶ Pursuant to the COD extension requirements in Section 40.6.3.5 of Attachment HH of the NYISO OATT, the NYISO must determine, in consultation with the Connecting Transmission Owner, whether a Cost Estimate Update is required in connection with an Interconnection Customer's requested extension. If a Cost Estimate Update is required and identifies revised cost estimates, the parties are required to include the updated cost estimates in the interconnection agreement. See NYISO OATT, Attach. HH § 40.6.3.5.3.3. The Amended Agreement does not modify the existing filed rate, but only includes in its Appendix A an updated estimate of the costs attributable to the COD extension, for which any additional cost amount will be allocated in accordance with the NYISO's OATT requirements. In accordance with the NYISO's filed rate, Gateway may be responsible for costs above its accepted estimated amount in accordance with the application of the NYISO's future cost responsibility requirements set forth in Section 40.16.3 of Attachment HH. The cost responsibility requirements prescribed in the NYISO's existing filed rate are reflected in the Amended Agreement.

- updated the descriptions of the responsibilities between NYPA and Gateway concerning the Attachment Facilities and System Upgrade Facilities in Appendix A;
- inserted certain NYPA operating requirements, which were incorporated into Appendix C; and
- updated NYPA's contact information in Appendices E and F.

Finally, the parties revised the Original Agreement to indicate that this is an "Amended and Restated" version and to correct the inadvertent removal of "Standard Large Generator" from the cover page of the Original Agreement.

The Amended Agreement does not include variations from the Pro Forma LGIA other than those already accepted by the Commission.⁷ Therefore, the Joint Filing Parties respectfully request that the Commission accept the Amended Agreement.

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

The Joint Filing Parties request an effective date of January 14, 2026, for the Amended 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 This agreement conforms to the Pro Forma LGIA in Attachment X of the NYISO OATT that was in effect at the time the prior version of the agreement was executed, along with the limited variations from that Pro Forma LGIA previously accepted by the Commission. This amendment to the Original Agreement was not the result of Gateway submitting a new Interconnection Request to the NYISO to modify its project. Accordingly, the parties have not updated the agreement to the current *pro forma* version of the agreement in Attachment X of the NYISO OATT or the new Standard Interconnection Agreement in Attachment HH of the NYISO OATT. *See, e.g., Midwest Independent Transmission System Operator, Inc.*, 124 FERC ¶ 61,277 at P 11 (2008) (accepting the use of a new interconnection agreement that conforms with the transmission provider's current *pro forma* agreement because the developer submitted a new interconnection request to increase its project's generating capacity and was therefore required to comply with the current *pro forma* procedures and agreement).

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 (April 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).

III. Request for CEII Treatment

Pursuant to Sections 388.112 and 388.113 of the Commission’s regulations,¹⁰ NYPA requests that the diagrams included in Appendix A of the Amended Agreement and labeled as Figures A-1, A-2, A-3, and A-4 be protected from disclosure as CEII.¹¹ The diagrams contain detailed, schematics of NYPA’s facilities that, if disclosed, could pose a threat to the security and the reliability of the New York State bulk power system. The diagrams provide more than simply the general location of critical infrastructure. Unlike publicly available maps of power transmission lines and generation and substation facilities, the schematics show the exact nature and specific location of facilities used to maintain the reliability of the New York State bulk power system.

The diagrams, in NYPA’s assessment, reveal such critical information related to the facilities depicted therein that, if disclosed, could be useful to a person seeking to disable the power grid. Therefore, the disclosure of the CEII diagrams would pose a threat to the reliability of the New York State bulk power system and the health and safety of New York residents. Moreover, the information revealed in these schematics reveal CEII, which the Commission has determined to be exempt from mandatory disclosure under 5 U.S.C. § 552(b)(7)(F). The diagrams have been omitted from the Public version of the Amended Agreement included in this filing.

The Joint Filing Parties are electronically submitting a non-public version of this filing. The diagrams are included only in the non-public version of the Amended Agreement in the filing. The non-public diagrams are marked: **“FIGURE CONTAINS CEII – DO NOT RELEASE PURSUANT TO 18 C.F.R. §§ 388.112 and 388.113.”** The non-public diagrams should be treated as CEII reviewable by Commission Staff. In accordance with the Commission’s April 14, 2017 notice on labeling of non-public information, each page of the non-public version of the filing is marked **“CUI//CEII.”**¹² Placeholders have been included in place of the non-public diagrams in the public version of the Amended Agreement.

¹⁰ 18 C.F.R. §§ 388.112 and 388.113 (2025).

¹¹ As required by Section 388.113(d)(1)(i) of the Commission’s regulations, NYPA has described in the filing letter how the diagrams in Appendix A satisfy the definition of critical energy infrastructure information as that term is defined in Section 388.113(c)(2). In addition, as required by Section 388.113(d)(1)(ii) the cover page of the filing letter and the relevant pages of the Agreement that contain critical energy infrastructure information are labelled as including CEII and marked DO NOT RELEASE, and a Public and CEII version of the Agreement are being filed with this letter. The CEII material is redacted in the Public version. Finally, as required by Section 388.113(d)(1)(i), NYPA requests that the Commission designate the CEII material submitted on January 29, 2026, with the full five-year CEII designation provided for in Section 388.113(e)(1) as the information provided in the one-line diagrams will continue to satisfy the definition of critical energy infrastructure information for this entire period.

¹² See Notice of Document Labelling Guidance for Documents Submitted to or Filed with the Commission or Commission Staff (Apr. 14, 2017) (unreported).

All communications relating to this request for privileged and confidential treatment should be addressed to NYPA's Counsel listed below.

IV. Communications and Correspondence

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

For the NYISO¹³

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¹³ 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 Public version of the Amended Agreement (Attachment I);
- A blacklined Public version of the Amended Agreement showing the changes from the Original Agreement (Attachment II);
- A clean CEII version of the Amended Agreement (Attachment III); and
- The signature pages for the Amended Agreement (Attachment IV).

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 Joint Filing Parties respectfully request that the Commission accept the Amended Agreement for filing with an effective date of January 14, 2026.

Respectfully submitted,

s/ Sara B. Keegan

Sara B. Keegan

Counsel for the

New York Independent System Operator, Inc.

s/ Nathan D. Markey

Nathan D. Markey

Counsel for

New York Power Authority

cc: Janel Burdick
Emily Chen
James Dawson
Jignasa Gadani
Leanne Khammal

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