

**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 III BELOW, AND IS SUBMITTED SEPARATELY.**

February 25, 2026

**By Electronic Delivery**

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

Re: Filing of an Executed Amended and Restated Large Generator Interconnection Agreement for the Sunrise Offshore Wind Project (NYISO Queue Position Nos. 766 and 987) Among the New York Independent System Operator, Inc., Long Island Power Authority, and Sunrise Wind, LLC; Request for Critical Energy Infrastructure Information Designation; 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 Act<sup>1</sup> and Section 35.13 of the Commission's regulations,<sup>2</sup> the New York Independent System Operator, Inc. ("NYISO") hereby tenders for filing an executed Amended and Restated Large Generator Interconnection Agreement for the Sunrise Offshore Wind project (NYISO Queue Position Nos. 766 and 987) entered into by the NYISO, Long Island Power Authority ("LIPA"), f/k/a Long Island Lighting Company d/b/a LILCO, as the Connecting Transmission Owner, and Sunrise Wind, LLC ("Sunrise"), as the Developer (the "Amended Agreement").<sup>3</sup> The Amended Agreement is labeled as Service Agreement No. 2795 under the NYISO's Open Access Transmission Tariff ("OATT").

The NYISO respectfully requests that the Commission accept the Amended Agreement for filing. With the limited exceptions described in Part I.B of this letter, 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. Further, as described in

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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, or HH of the OATT, and if not defined therein, in the OATT and NYISO Market Administration and Control Area Services Tariff.

Part II of this letter, the NYISO respectfully request a waiver of the Commission’s prior notice requirements<sup>4</sup> to make the Amended Agreement effective as of February 10, 2026, which is the date of its execution. Finally, as described in Part III of this letter, LIPA requests that the one-line diagram included in the Amended Agreement be protected from disclosure as Critical Energy Infrastructure Information.

## **I. Discussion**

### **A. Background**

The Amended Agreement supersedes the Large Generator Interconnection Agreement among the NYISO, LIPA,<sup>5</sup> and Sunrise that was filed in the Commission’s Docket No. ER23-2850-000 on September 15, 2023,<sup>6</sup> and was accepted by the Commission on November 9, 2023 (the “Original Agreement”).<sup>7</sup> The Original Agreement was based on and is consistent with the Pro Forma LGIA, but included certain non-conforming modifications, which were accepted by the Commission.

Sunrise is constructing a 924 MW wind-powered electricity generating facility located offshore on the submerged lands of the federal outer continental shelf in the Bureau of Ocean Energy Management lease area OCS-A-0487 (the “Facility”). Additional details regarding the Facility can be found in Appendix C of the Amended Agreement.

The Facility will interconnect to certain facilities of LIPA located in the Town of Holtsville, New York that are part of the New York State Transmission System. The Point of Interconnection is LIPA’s 138 kV Holbrook Substation. Figure A-1 in Appendix A of the Amended Agreement includes a one-line diagram showing the Point of Interconnection.

Subsequent to the effective date of the Original Agreement, Sunrise proposed to update its Commercial Operation Date (“COD”), which the NYISO determined was not material. Accordingly, the parties agreed to revise the Original Agreement to reflect: (i) the updated milestones dates, (ii) the revised cost estimate pursuant to Section 40.6.3.5 of Attachment HH to the NYISO OATT in connection with the COD extension,<sup>8</sup> and (iii) the revised description of

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<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).

<sup>5</sup> Long Island Power Authority is the successor entity of Long Island Lighting Company d/b/a LIPA, the signatory of the Original Agreement.

<sup>6</sup> *New York Independent System Operator, Inc.*, Docket No. ER23-2850-000 (Sept. 15, 2023).

<sup>7</sup> *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER23-2850-000 (Nov. 9, 2023).

<sup>8</sup> 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 appendices an updated estimate of the costs attributable to

security, which was adjusted to address the revised cost estimate and the work completed prior to the Effective Date of the Amended Agreement. In addition, the parties have revised the Original Agreement to reflect that this is an “Amended and Restated” agreement, to include in Appendix A certain metering requirements, to reflect in Appendix C the completion of a Limited Operation Reliability Study required under the Original Agreement, and to update contact information in Appendix F.

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

The Amended Agreement was fully executed on February 10, 2026, by the NYISO, LIPA, and Sunrise. The Amended Agreement largely conforms to the language in the Pro Forma LGIA contained in Attachment X of the NYISO OATT and does not include non-conforming variations other than those already accepted by the Commission for the Original Agreement and the following updates to the LIPA-specific modifications to the Pro Forma LGIA previously accepted by the Commission.<sup>9</sup> These changes are required to address a reorganization completed by LIPA subsequent to the effective date of the Original Agreement:

- The introductory paragraph and Recitals have been revised to reflect the update to the LIPA signatory;
- Article 1 has been modified to clarify that LIPA’s Board of Trustees is a Governmental Authority under the Amended Agreement; and
- Article 3 has been modified to reflect the update to the LIPA signatory.

These modifications do not change the substantive terms previously accepted by the Commission for the Original Agreement, but simply reflect updates to LIPA’s organization.

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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, Sunrise 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 of the NYISO OATT. The cost responsibility requirements prescribed in the NYISO’s existing filed rate are reflected in the Amended Agreement.

<sup>9</sup> 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 Sunrise 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).

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

The NYISO requests an effective date of February 10, 2026, for the Amended Agreement, which is the date of its full execution. The NYISO respectfully requests that the Commission waive its prior notice requirement to permit the requested effective date.<sup>10</sup> The Commission has previously permitted interconnection agreements to become effective upon the date of execution.<sup>11</sup>

## **III. Request for CEII Treatment**

LIPA has indicated that the one-line diagram included as the figure in Appendix A of the Amended Agreement contains detailed, one-line schematics of LIPA's facilities that, if disclosed, could pose a threat to the security and the reliability of the New York State bulk power system. Pursuant to Sections 388.112 and 388.113 of the Commission's regulations,<sup>12</sup> at LIPA's request,<sup>13</sup> the NYISO requests that the one-line diagram included in Appendix A of the Amended Agreement be protected from disclosure as Critical Energy Infrastructure Information ("CEII").<sup>14</sup> The diagram provides more than simply the general location of critical infrastructure. Unlike publicly available maps of power transmission lines and generation and substation facilities, the

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<sup>10</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>11</sup> *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).

<sup>12</sup> 18 C.F.R. §§ 388.112 and 388.113 (2025).

<sup>13</sup> As LIPA is a non-jurisdictional municipal utility pursuant to Section 201(f) of the FPA, the NYISO is submitting this Interconnection Agreement pursuant to Section 205 as the sole filing party and is requesting CEII treatment of certain material detailed in this Section III at LIPA's request on its behalf. Any questions concerning this request for privileged and confidential treatment should be directed to LIPA at the contact information provided below.

<sup>14</sup> As required by Section 388.113(d)(1)(i) of the Commission's regulations, LIPA has described in the filing letter how the one-line diagram in Appendix A satisfies 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 page of the Amended 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 Amended 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), LIPA requests that the Commission designate the CEII material submitted on February 25, 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.

schematic shows the exact nature and specific location of facilities used to maintain the reliability of the New York State bulk power system.

The diagram, in LIPA's assessment, reveals 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 diagram has been omitted from the Public version of the Amended Agreement included in this filing.

At LIPA's request, the NYISO is electronically submitting a non-public version of this filing. The diagram is included only in the non-public version of the Agreement in the filing. The non-public diagram is marked: "**FIGURE CONTAINS CEII – DO NOT RELEASE PURSUANT TO 18 C.F.R. §§ 388.112 and 388.113.**" The non-public diagram 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.**"<sup>15</sup> Placeholders have been included in place of the non-public diagrams in the public version of the Agreement.

All communications relating to this request for privileged and confidential treatment should be addressed to:

Iram Iqbal, Director - Power Systems  
Management  
Long Island Electric Utility Service  
LLC  
175 East Old Country Rd.  
Hicksville, NY 11801  
Tel: (516) 949-8613  
robert.grassi@psegliny.com  
iram.iqbal@psegliny.com

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<sup>15</sup> See Notice of Document Labelling Guidance for Documents Submitted to or Filed with the Commission or Commission Staff (Apr. 14, 2017) (unreported).

**IV. Communications and Correspondence**

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

**For the NYISO<sup>16</sup>**

Robert E. Fernandez, Executive Vice  
President, General Counsel, & Chief  
Compliance Officer  
Karen Georgenson Gach, Deputy General  
Counsel  
\*Sara B. Keegan, Assistant General Counsel  
New York Independent System Operator, Inc.  
10 Krey Boulevard  
Rensselaer, NY 12144  
Tel: (518) 356-6000  
Fax: (518) 356-4702  
skeegan@nyiso.com

\*Ted J. Murphy  
Hunton Andrews Kurth LLP  
2200 Pennsylvania Avenue, NW  
Washington, D.C. 20037  
Tel: (202) 955-1500  
Fax: (202) 778-2201  
tmurphy@hunton.com

Michael J. Messonnier Jr.  
\*Sevren R. Gourley  
Hunton Andrews Kurth LLP  
951 East Byrd Street  
Richmond, VA 23219  
Tel: (804) 788-8200  
Fax: (804) 344-7999  
mmessonnier@hunton.com  
sgourley@hunton.com

\*Designated to receive service.

**V. Documents Submitted**

The NYISO respectfully submits 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).

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<sup>16</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.

**VI. 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.

**VII. Conclusion**

Wherefore, the NYISO respectfully requests that the Commission accept the Amended Agreement for filing with an effective date of February 10, 2026.

Respectfully submitted,

*s/ Sara B. Keegan* \_\_\_\_\_

Sara B. Keegan

*Counsel for the*

*New York Independent System Operator, Inc.*

cc: Janel Burdick  
Emily Chen  
James Dawson  
Jignasa Gadani  
Leanne Khammal  
Jaime Knepper  
David Morenoff  
Jason Rhee  
Douglas Roe

Robert G. Grassi, Assistant Counsel Regulatory, Long Island Power Authority

Lisa Zafonte, Assistant General Counsel, Long Island Power Authority