

April 16, 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 Small Generator Interconnection Agreement for the Ticonderoga Solar Project (NYISO Queue Position No. 734) Among the New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and ELP Ticonderoga Solar 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 Commission's regulations,² 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 Amended and Restated Small Generator Interconnection Agreement for the Ticonderoga Solar project (NYISO Queue Position No. 734) entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and ELP Ticonderoga Solar LLC ("Ticonderoga"), as the Interconnection Customer (the "Amended Agreement").³ The Amended Agreement is labeled as Service Agreement No. 2666 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* Small Generator Interconnection Agreement ("Pro Forma SGIA") that is contained in Attachment Z to the OATT with limited non-conforming exceptions previously accepted by the Commission for the prior version of this agreement.⁴ 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 Z or HH of the OATT, and if not defined therein, in the OATT and NYISO Market Administration and Control Area Services Tariff.

⁴ This Amended Agreement conforms to the Pro Forma SGIA in Attachment Z of the NYISO OATT that was in effect at the time the Original Agreement was executed, along with the limited variations from that *pro forma* previously accepted by the Commission. The subsequent amendments to this agreement addressed non-material modifications to the project accepted by the NYISO and were not the result of Ticonderoga 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 Z of the NYISO OATT. *See, e.g.,*

Parties respectfully request a waiver of the Commission's prior notice requirements⁵ to make the Amended Agreement effective as of April 2, 2026, which is the date of its execution.

I. Discussion

A. Background

The Amended Agreement supersedes the Small Generator Interconnection Agreement among the NYISO, National Grid, and Ticonderoga that was filed in the Commission's Docket No. ER22-1489 on March 29, 2022, and was accepted by the Commission on May 16, 2022 (the "Original Agreement").⁶ The Original Agreement was based on and is consistent with the Pro Forma SGIA, but included certain non-conforming modifications, which were accepted by the Commission.

Ticonderoga is constructing a 20 MW solar generating facility located in the town of Ticonderoga, New York (the "Facility"). The Facility will interconnect to certain facilities of National Grid that are part of the New York State Transmission System. Additional details regarding the Facility can be found in Attachment 2 of the Amended Agreement.

Subsequent to the effective date of the Original Agreement, Ticonderoga requested to update the project's 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,⁷ and (iii) the revised description of security, which was adjusted to address the revised cost estimate.

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).

⁵ See *Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139, *clarified*, 65 FERC ¶ 61,081 (1993).

⁶ *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER22-1489-000 (May 16, 2022).

⁷ 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 the COD extension, for which any additional cost amount will be allocated in accordance with the NYISO's OATT requirements.

In addition, the parties made the following additional revisions to the Original Agreement:

- to reflect that this is an “Amended and Restated” agreement;
- to update the parties’ contact information in Article 13 and Attachments 8 and 9 of the Amended Agreement;
- to clarify National Grid specifications in Attachment 2;
- to clarify milestone requirements in Attachment 4;
- to update certain required System Upgrade Facilities in Attachment 6;
- to account for certain affected system work in Attachment 6; and
- to remove from Attachment 4 an unused advancement payment billing option developed for the Original Agreement and to back out the related non-conforming change in Article 6.1.1 to permit such option that the Commission accepted for the Original Agreement.

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

The Amended Agreement was fully executed on April 2, 2026. The Amended Agreement does not include variations from the Pro Forma SGIA other than those already accepted by the Commission for the prior versions of the agreement. 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 April 2, 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

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. 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.

IV. Documents Submitted

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

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

V. 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 April 2, 2026.

Respectfully submitted,

s/ Michael J. Messonnier, Jr.

Michael J. Messonnier, Jr.

Counsel for the

New York Independent System Operator, Inc.

s/ Christopher J. Novak

Christopher J. Novak

Counsel for Niagara Mohawk Power Corporation

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