

**THIS FILING LETTER DOES NOT CONTAIN ANY CEIL. ATTACHMENTS I, II, AND IV DO NOT CONTAIN ANY PRIVILEGED OR CONFIDENTIAL INFORMATION. ATTACHMENT III INCLUDES ONE-LINE SCHEMATICS FOR WHICH CEIL DESIGNATION IS REQUESTED IN PART III BELOW, AND IS SUBMITTED SEPARATELY.**

July 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 Interconnection Agreement for the Yellow Barn Solar Project (Queue Position No. 1009) Among the New York Independent System Operator, Inc., New York State Electric & Gas Corporation, and Yellow Barn Solar, LLC; Request for Waiver of the 60-Day Notice Period; and Request for Critical Energy Infrastructure Information Designation; 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 Federal Energy Regulatory Commission's (the "Commission") regulations,<sup>2</sup> the New York Independent System Operator, Inc. ("NYISO") and the New York State Electric & Gas Corporation ("NYSEG") (together, the "Joint Filing Parties") hereby tender for filing an executed Amended and Restated Standard Interconnection Agreement for the Yellow Barn Solar Project (NYISO Queue Position No. 1009) among the NYISO, NYSEG, as the Connecting Transmission Owner, and Yellow Barn Solar, LLC ("Yellow Barn"), as the Interconnection Customer (the "Amended Agreement").<sup>3</sup> The Amended Agreement is labeled as Service Agreement No. 2945 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* Standard Interconnection Agreement ("Pro Forma IA") that is contained in Attachment HH of the OATT

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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.

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 Parties respectfully request a waiver of the Commission's prior notice requirements<sup>4</sup> to make the Amended Agreement effective as of July 20, 2026, which is the date of its execution. Finally, as described in Part III of this letter, NYSEG requests that the diagrams included in the Amended Agreement be protected from disclosure as Critical Energy Infrastructure Information.

## **I. Background**

Yellow Barn is constructing a 160 MW solar generating facility to be located in Tompkins County, New York (the "Facility"). The Facility will interconnect to certain facilities of NYSEG that are part of the New York State Transmission System. Additional details regarding the Facility can be found in Appendix A of the Amended Agreement.

The Amended Agreement supersedes the Standard Interconnection Agreement among the NYISO, NYSEG, and Yellow Barn that was filed in the Commission's Docket No. ER26-1274-000 on February 5, 2026, and was accepted by the Commission on April 3, 2026 (the "Original Agreement").<sup>5</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.

Subsequent to the effective date of the Original Agreement, Yellow Barn proposed revisions to the Facility's inverters, which modification the NYISO determined was not material. Accordingly, the NYISO, NYSEG, and Yellow Barn have revised Appendix A in the Amended Agreement to incorporate the updated description of the Facility. In addition, the parties have revised Appendix F to update Yellow Barn's contact information. Finally, the parties revised the Original Agreement to reflect that this is an "Amended and Restated" version of the agreement.

The Amended Agreement does not include variations from the Pro Forma LGIA other than those already accepted by the Commission for the prior version of the agreement. Therefore, the NYISO respectfully requests that the Commission accept the Amended Agreement.

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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> *New York Independent System Operator, Inc., et al.*, Letter Order, Docket No. ER26-1274-000 (Apr. 3, 2026).

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

The Joint Filing Parties request an effective date of July 20, 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.<sup>6</sup> The Commission has previously permitted interconnection agreements to become effective upon the date of execution.<sup>7</sup>

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

Pursuant to Sections 388.112 and 388.113 of the Commission's regulations,<sup>8</sup> NYSEG requests that the one-line diagrams included in Appendix A of the Amended Agreement be protected from disclosure as Critical Energy Infrastructure Information ("CEII").<sup>9</sup> The diagrams contain detailed, one-line schematics of NYSEG'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 NYSEG'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.

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<sup>6</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>7</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 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>8</sup> 18 C.F.R. §§ 388.112 and 388.113 (2025).

<sup>9</sup> As required by Section 388.113(d)(1)(i) of the Commission's regulations, NYSEG 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 Amended Agreement that contain critical energy infrastructure information are labeled 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), NYSEG requests that the Commission designate the CEII material submitted on July 29, 2026 with the full five-year CEII designation provided for in Section 388.113(e)(1) as the information provided in the diagrams will continue to satisfy the definition of critical energy infrastructure information for this entire period.

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.”**<sup>10</sup> A placeholder has been included in place of the non-public diagrams in the public version of the Amended Agreement.

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

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<sup>10</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>11</sup>**

Robert E. Fernandez, Executive Vice  
President, General Counsel & Chief  
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Karen Georgenson Gach, Deputy General  
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**For New York State Electric & Gas Corporation**

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\*Designated to receive service.

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<sup>11</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.

**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](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 Joint Filing Parties respectfully request that the Commission accept the Amended Agreement for filing with an effective date of July 20, 2026.

Respectfully submitted,

s/ Sara B. Keegan

Sara B. Keegan

*Counsel for the*

*New York Independent System Operator, Inc.*

s/ Jeffrey A. Rosenbloom

Jeffrey A. Rosenbloom

*Counsel for New York State Electric & Gas Corporation*

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