

August 24, 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 Second Amended and Restated Small Generator Interconnection Agreement for the Hawthorn Solar Project (NYISO Queue Position No. 832) Among the New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and Hawthorn 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 Second Amended and Restated Small Generator Interconnection Agreement for the Hawthorn Solar project (NYISO Queue Position No. 832) entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and Hawthorn Solar, LLC ("Hawthorn Solar"), as the Interconnection Customer (the "Second Amended Agreement").³ The Second Amended Agreement is labeled as Service Agreement No. 2756 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Second Amended Agreement for filing. The Second 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 versions 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

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.

requirements⁴ to make the Second Amended Agreement effective as of August 13, 2026, which is the date of its execution.

I. Discussion

A. Background

Hawthorn Solar is constructing a 20 MW solar generating facility located in the town of Hoosick Falls, 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 Second Amended Agreement.

The Second Amended Agreement supersedes the Amended and Restated Small Generator Interconnection Agreement among the NYISO, National Grid, and Hawthorn Solar that was filed in the Commission’s Docket No. ER25-1113-000 on January 31, 2025, and was accepted by the Commission on March 10, 2025 (the “Amended Agreement”).⁵ The Amended Agreement superseded the Small Generator Interconnection Agreement for the Facility among the NYISO, National Grid, and Hawthorn Solar that was filed in the Commission’s Docket No. ER23-1401-000 on March 16, 2023, and was accepted by the Commission on May 12, 2023 (the “Original Agreement”).⁶ The Amended Agreement and the Original Agreement were based on and are consistent with the Pro Forma SGIA, but included certain non-conforming modifications, which were accepted by the Commission.

Subsequent to the effective date of the Amended Agreement, Hawthorn Solar requested certain equipment changes to the Facility, which the NYISO determined were not material. In addition, Hawthorn Solar requested to update the project’s Commercial Operation Date (“COD”), which the NYISO determined was not material, and made related updates to the milestone dates set forth in Attachment 4 of the Second Amended Agreement. Accordingly, the NYISO, National Grid, and Hawthorn Solar have agreed to revise the Second Amended Agreement to reflect: (i) the updated equipment for the Facility in Attachment 2, along with the associated one-line diagram in Attachment 3, (ii) updated milestone dates in Attachment 4, (iii) the revised cost estimate in Attachment 2 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

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 Niagara Mohawk Power Corporation d/b/a National Grid*, Letter Order, Docket No. ER25-1113-000 (Mar. 10, 2025).

⁶ *New York Independent System Operator, Inc. and Niagara Mohawk Power Corporation d/b/a National Grid*, Letter Order, Docket No. ER23-1401-000 (May 12, 2023).

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 Second Amended Agreement

security in Attachment 4, which was adjusted to address the revised cost estimate. In addition, the parties have revised Attachments 2 and 6 of the Second Amended Agreement to reflect a change in telecommunications equipment for the Facility. The parties also revised Article 13 and Attachments 8 and 9 to the Second Amended Agreement to update the parties' contact information. Finally, the parties revised the Second Amended Agreement to reflect that this is a "Second Amended and Restated" version of the agreement.

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

The Second Amended Agreement was fully executed on August 13, 2026. The Second 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.⁸ Therefore, the Joint Filing Parties respectfully request that the Commission accept the Second 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 August 13, 2026, for the Second 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.⁹ The Commission has previously permitted interconnection agreements to become effective upon the date of execution.¹⁰

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.

⁸ This agreement conforms to the Pro Forma SGIA in Attachment Z of the NYISO OATT that was in effect at the time the original version of the agreement was executed, along with the limited variations from that Pro Forma SGIA previously accepted by the Commission. This amendment to the Amended Agreement was not the result of Hawthorn Solar 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 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).

⁹ 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).

¹⁰ *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*

III. Communications and Correspondence

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

For the NYISO¹¹

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Independent System Operator, Inc. and New York Power Authority, Letter Order, Docket No. ER08-699-000 (May 16, 2008) (same).

¹¹ 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 Second Amended Agreement (Attachment I);
- A blacklined version of the Second Amended Agreement showing the changes from the Amended Agreement (Attachment II); and
- The signature pages for the Second 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 Second Amended Agreement for filing with an effective date of August 13, 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

d/b/a National Grid

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