

August 25, 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 Small Generator Interconnection Agreement for the NY37 Solar Project (NYISO Queue Position No. 843) Among the New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and Greens Corners Solar LLC; Request for Waiver of the 60-Day Notice Period; Docket No. ER26-____-000

Dear Secretary 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 Small Generator Interconnection Agreement for the NY37 Solar project (NYISO Queue No. 843) entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and Greens Corners Solar LLC ("Greens Corners"), as the Interconnection Customer (the "Interconnection Agreement").³ The Interconnection Agreement is labeled as Service Agreement No. 2975 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing. With the limited exceptions described in Part I of this letter, the Interconnection Agreement conforms to the NYISO's *pro forma* Small Generator Interconnection Agreement ("Pro Forma SGIA") that is contained in Attachment Z to the OATT. Further, as described in Part II of this letter, the Joint Filing Parties respectfully request a waiver of the Commission's prior notice requirements⁴ to make the Interconnection Agreement effective as of August 13, 2026, which is the date of its full execution.

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

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).

I. Discussion

A. Background

Greens Corners is constructing a 20 MW solar generation facility in the town of Watertown, New York (the “Facility”). Additional details regarding the Facility can be found in Attachment 2 of the Interconnection Agreement.

The Facility will interconnect to certain facilities of National Grid that are part of the New York State Transmission System. The Point of Interconnection is National Grid’s Coffeen-West Adams Line 2, approximately 3.8 miles from National Grid’s Coffeen Substation and approximately 10.2 miles from National Grid’s West Adams Substation. Attachment 3 of the Interconnection Agreement includes a one-line diagram showing the Point of Interconnection.

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

The Interconnection Agreement was fully executed on August 13, 2026, by the NYISO, National Grid, and Greens Corners. The Interconnection Agreement largely conforms to the language in the Pro Forma SGIA with the exceptions described below in this Part I.B.⁵ The Joint Filing Parties submit that the limited changes specified below satisfy the Commission’s standard for variations from the Pro Forma SGIA, because unique circumstances exist that require a non-conforming agreement.⁶ Therefore, the Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement with the non-conforming changes.

1. Greens Corners’ Construction of Portions of the Connecting Transmission Owner’s Interconnection Facilities

Article 1.5.3 of the Pro Forma SGIA provides that the Connecting Transmission Owner shall construct, operate, and maintain its Interconnection Facilities covered by the agreement. National Grid and Greens Corners have agreed that Greens Corners will be responsible for

⁵ Greens Corners’ Facility participated in the NYISO’s Small Generator Interconnection Procedures in Attachment Z of the NYISO OATT. Pursuant to the transition rules of the NYISO’s new Standard Interconnection Procedures in Attachment HH of the OATT, the NYISO, National Grid, and Greens Corners used the Standard Small Generator Interconnection Agreement located in Attachment Z of the OATT for this Small Generating Facility project. NYISO OATT Attach. HH § 40.3.1.2 (“For a Class Year Project for Class Year 2021 or prior Class Years or a Small Generating Facility for which the ISO is negotiating with the Interconnection Customer, Connecting Transmission Owner, Affected System Operator, and/or Affected Transmission Owner, as applicable, an interconnection agreement and/or Engineering, Procurement, or Construction Agreement(s) as of the effective date of the Standard Interconnection Procedures, the parties shall continue to negotiate, as applicable, the Standard Large Generator Interconnection Agreement, Small Generator Interconnection Agreement, and/or Engineering, Procurement, or Construction Agreement pursuant to the terms and forms set forth, as applicable, in Attachment X or Attachment Z to the ISO OATT.”).

⁶ See, e.g., *PJM Interconnection, LLC*, 111 FERC ¶ 61,163 at PP 10-11, *reh’g denied*, 112 FERC ¶ 61,282 (2005).

constructing certain Connecting Transmission Owner's Interconnection Facilities associated with the Facility. Accordingly, the parties agreed to modify Article 1.5.3 of the Interconnection Agreement to clarify that the Interconnection Customer, Greens Corners, can construct the Connecting Transmission Owner's Interconnection Facilities and Upgrades with the agreement of the parties. The Commission has previously accepted this change to the Pro Forma SGIA.⁷

2. Modifications Required to Reflect Joint Ownership and Use of Certain Interconnection Facilities

The Facility will jointly own and share the use of certain interconnection facilities with the NY38 Solar Project (NYISO Queue Position No. 864), which project is also owned by Greens Corners.⁸ The parties inserted in Section F of Attachment 2 the details concerning how the shared facilities arrangement will interact with the requirements in the Interconnection Agreement. Accordingly, the parties have modified the notice provisions in Article 13 of the Interconnection Agreement to reference the contact requirements concerning the shared facilities. The Commission has previously accepted similar changes to NYISO interconnection agreements to reflect such shared facility arrangements.⁹

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 Interconnection 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.¹⁰ The Commission has previously permitted interconnection agreements to become effective upon the date of execution.¹¹

⁷ See *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Letter Order, Docket No. ER20-1603-000 (June 18, 2020) (accepting interconnection agreement modified to permit the Interconnection Customer to agree to construct Connecting Transmission Owner's Interconnection Facilities); *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Letter Order, Docket No. ER20-1602-000 (June 18, 2020) (same); *New York Independent System Operator, Inc. and Niagara Mohawk Power Corp.*, Letter Order, Docket No. ER22-2627-000 (Sept. 21, 2022) (same).

⁸ The NYISO, National Grid, and Greens Corners are amending the existing Large Generator Interconnection Agreement for the NY38 Solar Project, with Service Agreement No. 2770 to the NYISO OATT. The amended agreement will contain the same shared facilities requirements in its attachments as those included in the Interconnection Agreement. The NYISO and National Grid will file the amended agreement with the Commission upon its full execution.

⁹ See, e.g., *New York Independent System Operator, Inc., et al.*, Letter Order, Docket No. ER21-361-000 (Jan. 7, 2021) (accepting non-conforming revisions to address shared facilities arrangement with other project).

¹⁰ 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 and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139 (1993).

¹¹ 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); see also *New York Independent System Operator, Inc. and Niagara Mohawk Power Corp.*, Letter

III. Communications and Correspondence

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

For the NYISO¹²

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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).

¹² 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 Interconnection Agreement (Attachment I);
- A blacklined version of the Interconnection Agreement showing the changes from the Pro Forma SGIA (Attachment II); and
- The signature pages for the Interconnection 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.

VI. Conclusion

Wherefore, the Joint Filing Parties respectfully request that the Commission accept the Interconnection 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

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