



March 30, 2012

By Electronic Filing

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Niagara Mohawk Power Corporation d/b/a/ National Grid - Proposed
Amendments to the Wholesale Transmission Service Charge Under the NYISO
Open Access Transmission Tariff - Docket No. ER12-**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d, and Part 35.13 of the Commission's Regulations, 18 C.F.R. Part 35.13, Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid" or "Company") submits for filing revisions to the FERC Open Access Transmission Tariff ("OATT") administered by the New York Independent System Operator, Inc. ("NYISO").¹ The proposed changes are being made to certain National Grid-specific components of the Wholesale Transmission Service Charge ("Wholesale TSC") formula under the NYISO OATT, to become effective for transmission bills rendered for service on and after July 1, 2012. The primary purpose of this filing, in addition to certain ministerial changes, is to update the depreciation rates set forth in National Grid's Revenue Requirement ("RR") under the Wholesale TSC. National Grid respectfully submits that its proposal is just and reasonable and should be accepted without suspension or hearing.

I. Statement of Nature, Reasons and Basis for Filing

The primary objective of this filing is to modify depreciation rates set forth in the RR component of the Company's Wholesale TSC formula rate set forth in Attachment H to the NYISO OATT. The NYISO OATT specifically provides that the RR, the Scheduling, System Control and Dispatch Costs ("CCC") component, and Annual Billing Units ("BU") components of a Transmission Owner's Wholesale TSC rate may be updated "based on Transmission Owner filings to FERC."² Under the terms of Attachment H to the NYISO OATT, Transmission Owners, including the Company, have rights to amend the components of their respective Wholesale TSC rates on their

¹ Capitalized terms used, but not defined in this filing are intended to have the meanings given to such terms in Attachment H of the NYISO OATT including the April 2009 Settlement filed with the Commission on April 6, 2009.

² See NYISO OATT, Attachment H, Section 14.1.2.1.2.

own initiative by making the requisite filing for Commission approval under Section 205 of the FPA.³

In addition to making certain ministerial changes described below, National Grid is seeking to revise the Wholesale TSC in order to ensure that the depreciation rates in the RR are identical to those recently approved by the New York Public Service Commission ("NYPSC") in the state jurisdictional Case 10-E-0050. This will permit the Company to have a consistent set of depreciation rates on its books and ensure that both electric retail customers and Wholesale TSC customers are consistently charged the same depreciation rates.

Since it is the NYISO that administers the NYISO OATT, and specifically Attachment H which contains National Grid's Wholesale TSC, National Grid has consulted with the NYISO to determine a mutually acceptable means for National Grid to exercise its FPA Section 205 rights with respect to this amendment of the RR component of the Wholesale TSC. While not sponsoring National Grid's filing in this proceeding, the NYISO is submitting this filing on National Grid's behalf under the Commission's e-tariff regulations. Thus, the NYISO is facilitating the exercise of National Grid's FPA Section 205 rights with respect to this portion of the NYISO OATT.

II. Background

A. National Grid

National Grid, a New York corporation, is a combination gas and electric utility. National Grid is primarily engaged in the business of transmission and distribution of electricity, and the distribution and transportation of natural gas in New York State. National Grid serves over 1.6 million retail electric and 568,000 retail gas customers in Buffalo, Syracuse, Albany, and other portions of upstate New York. National Grid owns approximately 6,000 miles of electric transmission lines and 8,500 miles of main and distribution gas pipelines. All of National Grid's bulk transmission facilities are subject to the operational control of the NYISO. Transmission service and generator interconnections associated with National Grid's facilities are provided to customers on a non-discriminatory basis pursuant to the NYISO OATT. Approximately 30 municipal electric utilities in upstate New York currently take service under National Grid's Wholesale TSC. In addition, approximately 80 customers external to the NYISO take service under the Company's Wholesale TSC.

B. The Wholesale TSC

On January 27, 1999, the Commission conditionally accepted the proposal made by National Grid and the other New York Transmission Owners ("NYTOs") to establish the NYISO in Docket ER97-1523-000. In conjunction with that filing, on November 17, 1999, the NYTOs filed a joint settlement agreement among all parties except Sithe/Independence Power Partners, L.P. ("Sithe") resolving all issues set for hearing in Docket No. ER97-1523-000 ("the NYISO Settlement"). The NYISO Settlement established as part of Attachment H to the NYISO OATT a "settlement" Revenue Requirement and Transmission Service Charge for wholesale transmission services

³ *Id.* With respect to National Grid specifically, *see also* Section 14.1.9.4.3.6.

provided using National Grid's facilities that was made applicable to parties except those who were excepted.⁴

On February 11, 2008, as supplemented on May 30, 2008, National Grid submitted a filing under Section 205 of the Federal Power Act to replace its stated rates for its Transmission Service Charge in Attachment H to the NYISO OATT with formula rates to become effective May 1, 2008. On July 29, 2008, the Commission accepted and suspended the proposed formula rates, to become effective October 1, 2008, subject to refund, and establish hearing and settlement judge procedures.⁵ On April 6, 2009, National Grid on behalf of the Settling Parties⁶ filed a Settlement ("April 2009 Settlement") intended to resolve all issues set for hearing in that proceeding. Among other things, the Settlement set forth the terms of a formula rate for the calculation of National Grid's transmission service charge under the NYISO OATT (the "Settlement TSC Formula Rate"), as well as procedures for the annual adjustment of certain inputs to the formula rate. Contemporaneously with the filing of the Settlement, National Grid also filed an Unopposed Motion for Implementation of Settlement Rates on an Interim Basis, seeking authorization to implement the Settlement TSC Formula Rate on an interim basis. National Grid expressed that granting this motion would not prejudice any party to this proceeding, would allow customers to benefit from the lower rates and would reduce the amount of refunds that National Grid will be obligated to pay upon Commission approval of the Settlement. For good cause shown, the Commission's Chief Administrative Law Judge granted National Grid's motion for interim rate relief on April 8, 2009 and allowed the Settlement TSC to be implemented on an interim basis effective as of January 1, 2009 ("Settlement Effective Date") pending approval by the Commission. In a letter order issued June 22, 2009, the Commission approved the Settlement.⁷

On November 30, 2009, National Grid filed to modify the manner of calculating the long-term debt cost of capital rate. The filing sought to adjust the determination of the amount of long-term debt used in the calculation which was based on the average beginning of the year and year end long-term debt balances. On January 13, 2010 the filing was accepted by the Commission effective February 1, 2010.⁸

⁴ Non-settling parties were made subject to a separate "filed" Revenue Requirement and Transmission Service Charge ("Filed TSC"). The NYISO Settlement also required National Grid to make a compliance filing revising its Filed TSC under the NYISO OATT based on the outcome of the hearing in Docket No. 0A96-194-000. The NYISO Settlement was approved by the Commission by letter order dated July 31, 2000. National Grid subsequently filed to revised its Filed TSC rate based on the final outcome of Docket No. 0A96-194-000.

⁵ *Niagara Mohawk Power Corp.*, Order Accepting and Suspending Formula Rate Subject to Refund and Establishing Hearing and Settlement Judge Procedures, 124 FERC ¶ 61,106 (2008) ("July 29 Order"). Certain Settling Parties requested rehearing of aspects of the July 29 Order. On February 25, 2009, the Commission issued an Order that denied rehearing in part and granted rehearing in part. 126 FERC ¶ 61,173 (2009).

⁶ The signatories consist of National Grid and the following entities: Allegheny Electric Cooperative, Inc., the City of Cleveland, Ohio, Multiple Interveners, Municipal Electric Utilities Association, New York Association of Public Power, New York Municipal Power Agency, New York State Electric & Gas Corporation, and Rochester Gas & Electric Corporation ("Settling Parties").

⁷ See *Niagara Mohawk Power Corp.*, 127 FERC ¶ 61,289 (2009).

⁸ See *Niagara Mohawk Power Corp.*, unpublished Letter Order, Docket Nos. ER10-328-000, ER10-328-001 (January 13, 2010).

In accordance with the April 2009 Settlement, National Grid is directed to calculate each year new values for the Revenue Requirements (“RR”), control center costs (“CCC”) and billing units (“BU”) components of the Settlement TSC Formula Rate based on updated Data Inputs. National Grid is further directed to prepare an Annual Update that reflects the revised Data Inputs, the resulting RR, CCC, and BU components, and certain supporting information. According to Section 14.1.9.4 in Attachment H to the NYISO OATT, National Grid is directed on or before June 14th of each year to (1) post the Annual Update on the NYISO’s Internet website, (2) submit the Annual Update to the Commission as an informational filing requiring no action by the Commission, and (3) serve the Annual Update electronically on all Interested Parties.

In response to challenges to its 2010 Annual Update filing, National Grid filed with the Commission on November 18, 2010, a Stipulation and Agreement and a Supplemental Informational Filing (“2010 Stipulation”) setting forth a modification to be made in National Grid’s future Annual Updates of certain components of the National Grid TSC based on adjusted inputs to the Settlement TSC Formula Rate. Specifically, as stated in the 2010 Stipulation, National Grid agreed to include in the 2011 Annual Update a Billing Adjustment of (\$2,383,112) plus interest calculated in accordance with 18 C.F.R. §35.19(a) to reflect the removal of the Temporary Assessment under NY PSL section 18-a(6) from the 2009 Historical Transmission Revenue Requirement, and the Annual True-up of the 2010 forecasted revenue requirement will reflect a true-up to the actual 2010 revenue requirement that excludes any costs associated with the section 18-a Temporary Assessment. Subject to the requirements of any modification of NY PSL section 18-a (6), or regulations or regulatory orders implementing any such modifications thereto. National Grid also agreed to exclude the costs of the section 18-a Temporary Assessment in any future Annual Update of the Settlement TSC Formula Rate. National Grid further agreed in the 2010 Stipulation to, *inter alia*, provide certain documentation to the parties and take certain actions upon the receipt by National Grid of final reports, orders or other documents in currently pending regulatory investigation and audit proceedings before, respectively, the New York Public Service Commission and the FERC. National Grid and the interested parties further agreed that, conditioned upon the Commission’s acceptance of such filing without change or condition unacceptable to all Parties, no Party will submit any Preliminary Challenge or Formal Challenge to the 2010 Annual Update. The Commission accepted the 2010 Stipulation in a letter order issued January 7, 2011.⁹

III. Description of Filing

There are three types of changes being proposed in this filing. The primary purpose of the filing is to amend the depreciation rates set forth in the RR component of the Company’s Wholesale TSC rate. The testimony and exhibits of Mr. James Holodak support these changes. National Grid is proposing to reflect updated depreciation rates in its TSC formula rates pursuant to new depreciation studies that were submitted to the NYPSC as part of state-jurisdictional rate case proceedings. The depreciation rates set forth in this docket were approved by the NYPSC on January 20, 2011 with an effective date of January 24, 2011 in NYPSC Docket Number 10-E-0050.

⁹ See, *Niagara Mohawk Power Corporation*, Docket No. ER11-2228-000 (2011).

National Grid proposes to amend its transmission depreciation rates under the RR component of its Wholesale TSC rate in time for its 2012 Annual Update that will establish TSC rates effective as of July 1, 2012. NMPC's revenue requirement for calendar year 2011 will be used as the basis for determining its July 1, 2012 TSC rates. NMPC is proposing that the revised depreciation rates become effective as of January 24, 2011, the same date that identical depreciation rates were approved to become effective for NMPC by the NYPSC in Docket Number 10-E-0050.

Second, Mr. Holodak supports ministerial changes to Section 14.2 of Attachment H to the NYISO OATT, modifying Section headers so that they match the renumbering convention recently implemented by the NYISO as part of its e-tariff compliance filing. Specifically, the NYISO modified paragraph numbering in Attachment H of the NYISO OATT as part of its compliance with FERC Order 714, Electronic Tariff Filings. The NYISO OATT was renumbered to facilitate section-based filings in e-Tariff. The NYISO filed its e-Tariff baseline on June 30, 2010 in Docket No. ER10-1657-000.

Third, Mr. Holodak supports a modification to the revenue requirement calculation in Section 14.2 of the NYISO OATT to incorporate the terms of the 2010 Stipulation accepted by the Commission in Docket No. ER11-2228-000 as part of NMPC's 2010 Annual Update filing. Under the terms of the 2010 Stipulation, the Company agreed to exclude from any future Annual Update of the TSC rate the costs of a Temporary Assessment under section 18-a of the NY PSC. We have taken the opportunity in this filing to codify that change into National Grid's revenue requirement formula.

IV. Contents of Filing

- Attachment A, Service List
- Exhibits NMP-1 through NMP-7, which include:
 - Exhibit NMP-1 - Direct Testimony of James Holodak
 - Exhibit NMP-2 - Clean and Black-lined versions of revised sheets to the tariff
 - Exhibit NMP-3 - Cost of Service Statements AA through BL
 - Exhibit NMP-4 - Formula Rate Spreadsheets filed with 2011 Annual Update
 - Exhibit NMP-5 - Black-lined version of Formula Rate Spreadsheets
 - Exhibit NMP-6 - Testimony and exhibits of Ron White filed in NYPSC Case 10-E-0050
 - Exhibit NMP-7 - Testimony and exhibits of PSC Staff in NYPSC Case 10-E-0050

National Grid notes that Attachment A is attached to this transmittal letter and Exhibits NMP -1 through NMP-7 are contained in a separate volume.

V. Proposed Effective Date

National Grid respectfully requests the formula rate and associated tariff revisions be accepted for filing effective for transmission bills rendered for service on and after July 1, 2012. To the extent waiver is needed for this proposed effective date, National Grid hereby requests waiver. The Commission has actively encouraged transmission owners to adopt formula rates of the type implemented by National Grid herein. Consistent with its policy of encouraging formula rates, the Commission's practice has been to permit such formula rate filings to become effective after a suspension period of no more than one day.¹⁰ In this proceeding, National Grid requests the Commission to allow the amended depreciation rates for its amended RR component to go into effect as of January 24, 2011, the same date that the NYPSC allowed such rates to go into effect. The Company's calendar year 2011 cost of service calculated under the RR will be used for establishing the TSC rate for bills rendered for service on and after July 1, 2012.

VI. Communications

National Grid requests that all correspondence, pleadings and other communications concerning this filing be served upon the following persons to be designated for service:

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VII. Service

Pursuant to Section 32.5(d) of the Commission's Regulations, a copy of this filing is being served electronically on National Grid's customers under the rate affected by this filing, on the New York State Public Service Commission, and on the NYISO. The service list for this filing may be found in Attachment A to this filing letter.

VIII. Request for Waiver

National Grid respectfully requests waiver of any requirements of the Commission's rules and regulations, as well as any authorization as may be necessary or required, to permit the revised rates to be accepted by the Commission and made effective in the manner proposed herein.

IX. Miscellaneous

No agreement is required by contract for the filing of this rate filing. There are no costs included in this filing that have been alleged or adjudged in an administrative or judicial proceeding to be

¹⁰ *Allegheny Power System Operating Companies*, 111 FERC ¶ 61,308 at P 51 (2005) (accepting a formula rate proposal for filing and suspending it to become effective one day after the FERC order "where the Commission has, in fact, urged transmission owners to move from stated rates to formula rates"), *order on reh'g*, 115 FERC li 61,156 (2006).

illegal, duplicative, or unnecessary costs, nor has any expense or cost been demonstrated to be the product of discriminatory or employment practices, within the meaning of Section 35.13(d)(3).

X. Conclusion

For the foregoing reasons, National Grid respectfully requests that the Commission accept these proposed tariff changes without suspension, condition or modification.

Respectfully submitted,

/s/ Terry L. Schwennesen

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*Attorney for
Niagara Mohawk Power Corporation
d/b/a National Grid*

Attachments

Attachment A

E-Mail List of Interested Parties upon Which this Filing was Served

Attachment A

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Village of Andover	andover_dpw@yahoo.com
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Tupper Lake	johnbouck@centralny.twcbc.com
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Jamestown	dgustafson@jamestownbpu.com
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Allegheny Electric Cooperative	Bruce_Erickson@ccsenergy.com
Amerada Hess	hjain@hess.com
American Electric Power	sepotters@aep.com
Dominion Energy Marketing	Robert_J_LaRochelle@dom.com
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Consolidated Edison of NY	selfc@coned.com
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Public Service of Colorado	rodney.d.sgrignoli@xcelenergy.com
Pure Energy	delpowell@cox.net
PSEG Energy Resources and Trading	howard.fromer@pseg.com

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Southern Company Energy	vicki.lynch@mirant.com
TransCanada Power Marketing LTD	elaine_beaudry@transcanada.com
TXU Energy Trading	dbogus1@txu.com
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State of Vermont

DPS NY State

DPS NY State

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CERTIFICATE OF SERVICE

I hereby certify that I have served by electronic mail the foregoing document upon all parties on the email service list of Interested Parties provided on Attachment E of this Annual Update, pursuant to the requirements of the Settlement in the above-captioned proceedings.

Dated at Waltham, MA, this 30th day of March, 2012.

/s/ Terry Schwennesen
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