

August 20, 2012

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Niagara Mohawk Power Corporation
Filing of Interconnection Agreement with the Village of Solvay and
Request for Waiver of Commission Notice Requirement
Docket No. ER12-____-000**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act, 16 U.S.C. § 824d, and Part 35 of the Federal Energy Regulatory Commission's ("Commission") regulations, 18 C.F.R. Part 35, Niagara Mohawk Power Corporation d/b/a National Grid ("Niagara Mohawk") submits for filing and Commission acceptance an executed Interconnection Agreement between Niagara Mohawk and the Village of Solvay ("Solvay") ("Interconnection Agreement"), designated as Service Agreement No. 1913 under the New York Independent System Operator, Inc.'s ("NYISO") Open Access Transmission Tariff ("OATT"), FERC Electric Tariff, Original Volume No. 1. Niagara Mohawk respectfully requests that the Commission grant waiver to permit the Interconnection Agreement to go into effect as of June 18, 2012, as specified in the Interconnection Agreement.

I. Background

Niagara Mohawk is a transmission-owning public utility that has transferred operational control of its transmission facilities to the NYISO. Solvay is a municipal electrical utility located in the state of New York. The New York Power Authority ("NYPA") provides power and energy that are delivered to Solvay in accordance with the NYISO OATT utilizing facilities owned by National Grid.

National Grid and Solvay are parties to two existing interconnection agreements that facilitate the deliveries of power and energy to Solvay, one filed with and accepted by the Commission in Docket No. ER99-3170-000, and the other filed with and accepted by the Commission in Docket No. ER03-1304-000. National Grid is currently interconnected to Solvay at Solvay's Mathews Avenue substation, Industrial substation, and Lakeland substation. Solvay is making modifications to its existing Industrial and Mathews substations that will require modifications to National Grid's facilities. In connection with these modifications, National Grid and Solvay have entered into the

Interconnection Agreement included in this filing to set forth their respective rights and obligations as to their current and modified interconnection arrangements, which are intended to supersede and replace the interconnection arrangements described in the interconnection agreements accepted in Docket Nos. ER99-3170-000 and ER03-1304-000. Accordingly, on the same date as the instant filing, Niagara Mohawk is also filing with the Commission to cancel those two interconnection agreements.

II. Overview of the Interconnection Agreement

The Interconnection Agreement generally covers interconnection service provided by Niagara Mohawk for specified interconnection facilities at Solvay's Mathews Avenue substation, Industrial substation, and Lakeland substation. The Interconnection Agreement includes provisions covering an interconnection study and the operation and maintenance of the interconnection facilities. Under the Interconnection Agreement, interconnection service is provided on a contract basis, subject to all applicable regulatory requirements. The Interconnection Agreement also contains standard contract provisions such as provisions regarding insurance, payment of costs, and dispute resolution.

Solvay agrees to reimburse Niagara Mohawk for specified costs incurred with respect to the interconnection facilities. The Interconnection Agreement also sets forth procedures to be used if the interconnection facilities must be retired or modified, for termination, amendment, or modification of the Interconnection Agreement, and for notices between Niagara Mohawk and Solvay. Other provisions govern metering and losses, force majeure, liabilities and indemnification, choice of law, and other matters. The Interconnection Agreement is to continue in effect for twenty (20) years.

III. Request for Waiver of Commission Notice Requirements

Pursuant to Section 35.11 of the Commission's regulations (18 C.F.R. § 35.11), Niagara Mohawk respectfully requests waiver of Section 35.3 of the Commission's regulations (18 C.F.R. § 35.3) in order to permit the Interconnection Agreement to go into effect as of June 18, 2012. Under Section 35.3(a)(2), service agreements are to be filed with the Commission not more than 30 days after service has commenced or such other date as may be permitted by the Commission. Granting the requested waiver is appropriate because the June 18 effective date is consistent with the agreement of the customer, as specified in the Interconnection Agreement, and no party will be harmed by granting that effective date. For these reasons, the Commission should grant Niagara Mohawk's request for waiver of the notice requirements.

IV. Communications and Service

Communications regarding this filing should be addressed to the following individuals, whose names should be entered on the official service list maintained by the Secretary for the docket established with respect to this filing:

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Copies of this filing have been served on Solvay, the NYISO, and the New York State Public Service Commission.

Please contact the undersigned with any questions. Thank you for this assistance in this matter.

Respectfully submitted,

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