

May 9, 2013

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

**Re: Niagara Mohawk Power Corporation, d/b/a National Grid
Docket No. ER13-1077-001
Amendment to Large Generator Interconnection Agreement
with Indeck-Yerkes Limited Partnership and
Request for Waiver of Commission Notice Requirement**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”),¹ and Part 35 of the Federal Energy Regulatory Commission’s (“Commission”) regulations,² Niagara Mohawk Power Corporation d/b/a/ National Grid (“National Grid”) submits an amended Large Generator Interconnection Agreement (“LGIA”) between National Grid and Indeck-Yerkes Limited Partnership (“Indeck-Yerkes”). The attached LGIA (the “Amended Indeck-Yerkes LGIA”) is designated as First Revised Service Agreement No. 1970 under the New York Independent System Operator, Inc.’s (“NYISO”) Open Access Transmission Tariff (“OATT”). National Grid requests that the Commission accept the Amended Indeck-Yerkes LGIA effective as of the date it was executed, December 26, 2012.

I. Background

National Grid filed the original version of the Indeck-Yerkes LGIA in this proceeding on March 13, 2013, with a requested effective date of December 26, 2012. Subsequently, Commission Staff informed National Grid that the Indeck-Yerkes LGIA needed to be amended to replace the term Network Access Interconnection Service, which is no longer used in the NYISO OATT, with the terms Capacity Resource Interconnection Service (“CRIS”) and Energy Resource Interconnection Service (“ERIS”), as defined in the NYISO OATT.

II. The Amended Indeck-Yerkes LGIA

National Grid proposes to replace the term Network Access Interconnection Service with the terms CRIS and ERIS in Articles 1, 4.1.1, 13.4.2, and 29.8 of the Indeck-Yerkes

¹ 16 U.S.C. § 824d.

² 18 C.F.R. Part 35.

LGIA. The Amended Indeck-Yerkes LGIA defines CRIS and ERIS using the same definitions of those terms set forth in Article 1 of Appendix 6 to Appendix X (Large Generator Interconnection Procedures) to the NYISO OATT.

III. Effective Date and Request for Waiver

Pursuant to Section 35.11 of the Commission's regulations,³ National Grid respectfully requests waiver of the requirement contained in Section 35.3 of the Commission's regulations to file service agreements not more than 30 days after service under the agreements has commenced,⁴ in order to allow the Amended Indeck-Yerkes LGIA to become effective as of December 26, 2012.

The Parties have agreed that the Indeck-Yerkes LGIA "shall become effective upon execution by the Parties, subject to acceptance by FERC."⁵ The Parties executed the Indeck-Yerkes LGIA on December 26, 2012. Granting the requested waiver will permit the Amended Indeck-Yerkes LGIA to become effective as of the date agreed upon by the Parties and will not result in prejudice to any party. For these reasons, the Commission should find that good cause exists to grant an effective date of December 26, 2012.

³ 18 C.F.R. § 35.11.

⁴ 18 C.F.R. § 35.3.

⁵ Indeck-Yerkes LGIA, Article 2.1.

IV. Documents Enclosed

In addition to this filing letter, attached are the following documents:

- i. The Amended Indeck-Yerkes LGIA (First Revised Service Agreement No. 1970 under the NYISO OATT), provided in clean format (Attachment A)
- ii. Black-lined revisions showing the differences between the Amended Indeck-Yerkes LGIA and the Indeck-Yerkes LGIA as originally filed in this proceeding on March 13, 2013 (Attachment B)

V. 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 this proceeding:⁶

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

⁶ National Grid requests waiver of 18 C.F.R. § 385.203(b) to allow four persons to be added to the service list in this proceeding.

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VI. Conclusion

For the reasons stated herein, National Grid respectfully requests that the Commission accept the Amended Indeck-Yerkes LGIA effective as of December 26, 2012.

Respectfully submitted,

/s/ Amanda C. Downey

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