



February 24, 2011

By Electronic Delivery

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

Re: Filing of an Executed Large Generator Interconnection Agreement Among the
New York Independent System Operator, Inc., Niagara Mohawk Power
Corporation d/b/a National Grid, and PPM Roaring Brook, LLC, Docket No.
ER11-____-000

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act,¹ Section 35.12 of the Commission's Regulations,² and Section 11.3 of its Large Facility Interconnection Procedures ("LFIP"), the New York Independent System Operator, Inc. ("NYISO") and Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid") ("Joint Filing Parties") hereby tender for filing an executed standard large generator interconnection agreement ("Interconnection Agreement") as Service Agreement No. 1698 among the NYISO, National Grid as the Transmission Owner, and PPM Roaring Brook, LLC as the Developer.³ With the limited exceptions noted in Section II of this letter, the Interconnection Agreement conforms to the NYISO's *pro forma* Large Generator Interconnection Agreement ("LGIA") that is contained in Attachment X of the NYISO's OATT. The NYISO respectfully requests waiver of the Commission's 60-day notice period to make this Agreement effective as of the execution date, February 11, 2011.

¹ 16 U.S.C. § 824d (2006).

² 18 C.F.R. § 35.12 (2008).

³ Capitalized terms not otherwise defined in this letter have the meaning set forth in Attachments S and X of the NYISO's Open Access Transmission Tariff ("OATT").

I. Background

The Large Generating Facility is a 78 MW wind power plant that will consist of 39 Gamesa 2.0 MW 4-pole double-fed induction generators with wound rotor and slip rings. Each Gamesa generator operates at 0.69 kV and is connected to a generator step-up transformer ("GSU") to increase voltage to the 34.5 kV collection system voltage. Each GSU is connected to an underground collection system that in turn is connected to two (2) underground/overhead 34.5 kV collector circuits. The collector circuits extend approximately eight (8) miles to the Roaring Brook Wind Farm Station. The Roaring Brook Wind Farm Station contains transformation, control and protection equipment for interconnection to the Martinsburg Substation. The Large Generating Facility will connect to the Connecting Transmission Owner's 115 kV #5 Line between the Taylorville and Boonville Substations. The Point of Interconnection is identified on Figure A-1 to Appendix A of the Interconnection Agreement.

The Interconnection Agreement filed herein substantially conforms to the NYISO's *pro forma* LGIA contained in Attachment X of its OATT. However, as described in Section II, below, the parties have agreed to make a single, limited modification to the Agreement to reflect National Grid's operational control of the subject facilities.

II. Variations From the NYISO's Pro Forma LGIA

As noted above, the Agreement closely tracks the NYISO's *pro forma* LGIA. However, the parties have agreed to a limited and necessary modification from the *pro forma* agreement. Specifically, the parties have agreed to make a limited modification to Section 5.11 ("Connecting Transmission Owner's Attachment Facilities Construction") to provide that National Grid "will *not* transfer operational control of its Attachment Facilities or Stand Alone System Upgrade Facilities to the NYISO upon the completion of those facilities." This change is necessary because the Attachment Facilities and Stand Alone System Upgrade Facilities for this project will operate at a lower voltage than those facilities that are under the operational control of the NYISO, as that is defined in its Commission-approved tariffs and ISO-related Agreements. The NYISO thus does not exercise operational control over such low-voltage facilities, although Attachment X applies to all interconnections to the New York State Transmission System.

The Commission has accepted changes to the *pro forma* LGIA terms where, as here, there are unique circumstances associated with the interconnections, including "reliability concerns, novel legal issues or other unique factors."⁴ In fact, the modification to the *pro forma* LGIA in this Interconnection Agreement is identical to a modification previously accepted by the Commission.⁵ The Joint Filing Parties have included a blackline of the Interconnection

⁴ See *PJM Interconnection, LLC*, 111 FERC ¶ 61,163 at PP-10-11, *reh'g denied* 112 FERC ¶ 61,282 (2005).

⁵ See *New York Independent System Operator, Inc. and Niagara Mohawk Power Corporation d/b/a National Grid*, Docket No. ER08-1229-000 (Aug. 7, 2008).

Agreement against the NYISO's pro forma LGIA to highlight this change. The Joint Filing Parties respectfully request that the Commission permit this variation from the *pro forma* LGIA.

III. Effective Date and Request for Waiver of the 60-Day Notice Period

The parties request an effective date of February 11, 2011, the date of execution of the Interconnection Agreement. The Commission has allowed interconnection agreements to become effective on the date of execution, even when that date precedes the date that an interconnection agreement is filed. Accordingly, the parties request that the Commission grant a waiver of its prior notice requirements to the extent necessary to accommodate this requested effective date.

IV. Communications and Correspondence

Communications regarding this filing should be directed to:

For the NYISO

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*Designated to receive service.

V. Documents Submitted

The NYISO submits the following documents:

- A. this filing letter;**
- B. a clean Public version of the Interconnection Agreement; and**
- C. a blacklined version showing the Interconnection Agreement's change from the body of the NYISO's pro forma LGIA.**

VI. Service

The NYISO will send an electronic link to this filing to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the electric utility regulatory agency of New Jersey. In addition, a complete copy of this filing will be posted on the NYISO's website at www.nyiso.com.

VII. Conclusion

Wherefore, the NYISO respectfully requests that the Commission accept the attached Agreement effective as of February 11, 2011.

Respectfully submitted,

/s/ Sara B. Keegan

Sara B. Keegan
Counsel for the
New York Independent System Operator, Inc.

/s/ Daniel Galaburda

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