

September 22, 2015

**By Electronic Delivery**

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

**Re: *New York Independent System Operator, Inc., Amendment to Interconnection Agreement No. 2219; Docket No. ER15-2285-000.***

Dear Ms. Bose:

On July 27, 2015,<sup>1</sup> the New York Independent System Operator, Inc. (“NYISO”) and Niagara Mohawk Power Corporation d/b/a National Grid (“National Grid”) (collectively, the “Filing Parties”) submitted an executed Small Generator Interconnection Agreement (“Interconnection Agreement”) as Service Agreement No. 2219 among the NYISO, National Grid as the Connecting Transmission Owner, and Monroe County, New York as the Interconnection Customer.

Federal Energy Regulatory Commission “Commission” staff have notified the Filing Parties that they believe it is appropriate to update the portion of the Interconnection Agreement that relates to the Revenue Requirement Component of the O&M Option designated as “Option 1: Fixed On-Going Charge Payment,” and have requested that the Filing Parties submit a revised Interconnection Agreement that reflects updated language in this provision.

The Filing Parties have agreed that an update to this provision as proposed by Commission staff is appropriate. Accordingly, the Filing Parties herewith submit a revised Interconnection Agreement, which has been updated as follows:

In O&M ATTACHMENT 1 in Attachment 2 to the Interconnection Agreement, under the Revenue Requirement Components heading, entry A.2(a)(iii) has been revised to read

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<sup>1</sup> See: *New York Independent System Operator, Inc.* Docket No. ER15-2285-000, Letter to Secretary Bose from Sara B. Keegan and Amanda C. Downey, 7/27/2015 (“July 27 Filing”)

- (iii) the return on equity component, which shall be the product of the allowed ROE of 10.3% and Connecting Transmission Owner's actual common equity capitalization ratio.

## **I. Communications and Correspondence**

Communications regarding this filing should be directed to:

### **For the NYISO**

Robert E. Fernandez, General Counsel  
Karen Georgenson Gach, Deputy General Counsel  
\*Sara B. Keegan, Senior Attorney  
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### **For Niagara Mohawk d/b/a National Grid**

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\*Designated to receive service.

## **II. List of Documents Submitted**

The NYISO submits this filing letter and the following documents:

- a clean version of the revised Interconnection Agreement ("Attachment I");
- a blacklined version showing the changes between the Pro Forma SGIA and the revised Interconnection Agreement ("Attachment II"); and
- the signature pages for the revised Interconnection Agreement ("Attachment III").

### **III. Effective Date**

The Filing Parties respectfully request that the Commission accept the revised Interconnection Agreement for filing with an effective date of July 13, 2015, the same effective date requested by the Filing Parties in their July 27 Filing.

### **IV. Service**

The NYISO will e-mail a copy of this filing to the official representative of each party to this proceeding, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, the NYISO will post this filing on the NYISO's website at [www.nyiso.com](http://www.nyiso.com) and will e-mail the electronic link to the filing to each of its customers and to each participant of its stakeholder committees.

### **V. Conclusion**

The Filing Parties respectfully request that the Commission accept this amendment to the July 27 Filing in the above captioned proceeding to be effective July 13, 2015.

Respectfully submitted,

/s/ Sara B. Keegan

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

/s/Amanda C. Downey

Amanda C. Downey  
Counsel for Niagara Mohawk Power Corporation d/b/a  
National Grid

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 22<sup>nd</sup> day of September 2015.

/s/ Joy A. Zimmerlin

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