

April 28, 2017

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

**Re: New York Independent System Operator, Inc.
Docket No. ER11-2402-001
Compliance Filing**

Dear Secretary Bose:

Niagara Mohawk Power Corporation (“Niagara Mohawk”) hereby submits its filing to comply with the letter order issued by the Commission in this proceeding on February 10, 2011.¹

In the letter order, the Commission conditionally accepted a Large Generator Interconnection Agreement (“LGIA”) between Niagara Mohawk and WPS Syracuse Generation, LLC (“WPS Syracuse”),² subject to Niagara Mohawk’s submittal of a compliance filing within 30 days after the letter order was issued. The Commission directed that in the compliance filing, Niagara Mohawk must either: (1) revise Appendix H to the LGIA with WPS Syracuse to remove Section 5.8 (entitled Information Exchange) from the list of sections of the LGIA to which Niagara Mohawk and WPS Syracuse believe the NYISO *pro forma* Large Generator Interconnection Agreement is not applicable; or (2) explain why Section 5.8 should continue to be listed in Appendix H.

Niagara Mohawk regrets the oversight in not submitting this compliance filing earlier. Due to an administrative issue that arose when the WPS Syracuse LGIA was submitted to the Commission, NYISO representatives were listed on the Commission’s e-mail service list but Niagara Mohawk representatives were not. NYISO representatives recently pointed out the outstanding compliance obligation to Niagara Mohawk.

¹ Commission letter order, Docket No. ER11-2402-000 (Feb. 10, 2011).

² The LGIA with WPS Syracuse is designated as Service Agreement No. 316 under the New York Independent System Operator Inc.’s (“NYISO”) Open Access Transmission Tariff, with an effective date of February 15, 2011.

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In the instant compliance filing, Niagara Mohawk has revised the Appendices to the LGIA with WPS Syracuse to remove Section 5.8 from the list of inapplicable provisions in Appendix H. Niagara Mohawk notes that the delay in removing Section 5.8 from the list did not result in any harm. Section 5.8 addresses the exchange of design information about Attachment Facilities prior to their construction so that the parties can work “in good faith to make any necessary design changes.” No new Attachment Facilities associated with the WPS Syracuse facility have been designed or constructed since 2011.

The clean version of the revised Appendices to the LGIA with WPS Syracuse is provided in Attachment A hereto, and the revision to Appendix H of the Appendices is shown in red-line format in Attachment B hereto.

Please contact the undersigned with any questions. Thank you.

Respectfully submitted,

/s/ Amanda C. Downey

Amanda C. Downey

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*Attorney for Niagara Mohawk Power
Corporation*

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 28th day of April, 2017.

/s/ **Daniel Klein**
Daniel Klein
Alston & Bird LLP