

May 30, 2017

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 Copenhagen Wind Farm, LLC; Request for Waiver of the 60-Day Notice Period; Docket No. ER17-____-000

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act¹ and Section 35.12 of the Commission's regulations,² the New York Independent System Operator, Inc. ("NYISO") and Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid") (together, the "Joint Filing Parties") hereby tender for filing an executed Large Generator Interconnection Agreement entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and Copenhagen Wind Farm, LLC ("Copenhagen"), as the Developer (the "Interconnection Agreement").³ The Interconnection Agreement is labeled as Service Agreement No. 2334 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing. With one limited non-conforming exception, the justification for which is described in Part I of this letter, the Interconnection Agreement conforms to the NYISO's *pro forma* Large Generator Interconnection Agreement ("Pro Forma LGIA") that is contained in Attachment X to the OATT. Further, as described in Part II of this letter, the Joint Filing Parties respectfully request a waiver of the Commission's prior notice

¹ 16 U.S.C. § 824d (2016).

² 18 C.F.R. § 35.12 (2016).

³ Capitalized terms that are not otherwise defined in this filing letter shall have the meaning specified in Attachments S or X of the NYISO OATT, and if not defined therein, in the NYISO OATT and NYISO Market Administration and Control Area Services Tariff.

requirements⁴ to make the Interconnection Agreement effective as of May 15, 2017, which is the date of its execution.

I. Discussion

A. Background

Copenhagen is constructing a wind facility in Denmark, New York (“Facility”). The Facility will consist of forty Vestas Model Optispeed V110 VCSS 2.0 MW wind turbines, the total output of which will not exceed 79.9 MW. Additional details regarding the Facility can be found in Appendix C of the Interconnection Agreement.

The Facility will interconnect to certain transmission facilities of National Grid that are part of the New York State Transmission System. The Point of Interconnection is between structures 42 and 43 on National Grid’s 115 kV Black River – Lighthouse Hill Line #6. Figure A-1 of Appendix A of the Interconnection Agreement provides a one-line diagram showing the Point of Interconnection.

B. The Interconnection Agreement Closely Conforms to the Pro Forma LGIA Contained in Attachment X of the NYISO OATT

The Interconnection Agreement was executed on May 15, 2017 by the NYISO, National Grid, and Copenhagen. The Interconnection Agreement follows the language in the Pro Forma LGIA contained in Attachment X of the NYISO OATT with one exception. The Interconnection Agreement includes one limited variation from the Pro Forma LGIA described in Part I.B below, which variation is necessary to accurately describe the operational control of the attachment facilities and upgrades associated with the Facility. The Joint Filing Parties submit that the change specified below satisfies the Commission’s standard for variations from the Pro Forma LGIA, because unique circumstances exist that require a non-conforming agreement.⁵ Therefore, the Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement with the limited non-conforming change.

1. Modification to Address Operational Control of Attachment Facilities and Upgrades

The parties have agreed to modify Article 5.11 (“Connecting Transmission Owner’s Attachment Facilities Construction”) to provide that National Grid shall “not” transfer operational control of the Connecting Transmission Owner’s Attachment Facilities (“CTOAFs”) and Stand-Alone System Upgrade Facilities (“SASUFs”) associated with the Facility to the NYISO after their construction. This change is necessary because National Grid will retain

⁴ See *Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139, *clarified*, 65 FERC ¶ 61,081 (1993).

⁵ See, e.g., *PJM Interconnection, LLC*, 111 FERC ¶ 61,163 at PP 10-11, *reh’g denied*, 112 FERC ¶ 61,282 (2005).

operational control over these 115 kV facilities. The Commission has previously accepted this change to the Pro Forma LGIA in similar circumstances.⁶

II. Proposed Effective Date and Request for Wavier of the 60-Day Notice Period

The Joint Filing Parties request an effective date of May 15, 2017, which is the date of its execution. The Joint Filing Parties respectfully request that the Commission waive its prior notice requirement to permit the requested effective date. The Commission has previously permitted interconnection agreements to become effective upon the date of execution.⁷

III. Communications and Correspondence

All communications and service in this proceeding should be directed to:

For the NYISO⁸

Robert E. Fernandez, General Counsel
Raymond Stalter, Director, Regulatory Affairs
*Sara B. Keegan, Senior Attorney
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
Tel: (518) 356-8554
Fax: (518) 356-4702
skeegan@nyiso.com

*Ted J. Murphy
Hunton & Williams LLP
2200 Pennsylvania Avenue, NW
Washington, D.C. 20037
Tel: (202) 955-1500
Fax: (202) 778-2201
tmurphy@hunton.com

*Michael J. Messonnier Jr.
Hunton & Williams LLP
951 East Byrd Street
Richmond, VA 23219
Tel: (804) 788-8200
Fax: (804) 344-7999
mmessonnier@hunton.com

⁶ See, e.g., *New York Independent System Operator, Inc. and Niagara Mohawk Power Corp.*, Letter Order, Docket No. ER10-1507-000 (August 17, 2010); *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER09-905-000 (May 15, 2009).

⁷ See, e.g., *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Docket No. ER11-2953-000 (April 7, 2011) (accepting interconnection agreement effective as of date of execution); see also *New York Independent System Operator, Inc. and Niagara Mohawk Power Corp.*, Letter Order, Docket No. ER08-985-000 (June 26, 2008) (same); *New York Independent System Operator, Inc. and New York Power Authority*, Letter Order, Docket No. ER08-861-000 (May 27, 2008) (same); *New York Independent System Operator, Inc. and New York Power Authority*, Letter Order, Docket No. ER08-699-000 (May 16, 2008) (same).

⁸ The NYISO respectfully requests waiver of 18 C.F.R. § 385.203(b)(3) (2014) to permit service on counsel in both Washington, D.C. and Richmond, VA.

For National Grid:

*Kathryn Cox-Arslan
Director, Commercial Services
National Grid
40 Sylvan Road
Waltham, MA 02451
Tel: 781-907-2406
Fax: 781-522-1063
Kathryn.Cox-Arslan@nationalgrid.com

*Amanda C. Downey
Counsel for National Grid USA
Service Company, Inc.
40 Sylvan Road
Waltham, MA 02451
Tel: 781-907-2136
Fax: 781-907-5701
Amanda.Downey@nationalgrid.com

*Designated to receive service.

IV. Documents Submitted

The NYISO respectfully submits the following documents with this filing letter:

- A clean version of the Interconnection Agreement (“Attachment I”);
- A blacklined version of the Interconnection Agreement showing the changes from the body of the Pro Forma LGIA (“Attachment II”); and
- The signature pages for the Interconnection Agreement (Attachment III).

V. 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 New Jersey Board of Public Utilities. In addition, a complete copy of the documents included with this filing will be posted on the NYISO’s website at www.nyiso.com.

VI. Conclusion

Wherefore, the Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing with an effective date of May 15, 2017.

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

cc: Michael Bardee
Nicole Buell
Anna Cochrane
Kurt Longo
David Morenoff
Daniel Nowak
Larry Parkinson
J. Arnold Quinn
Douglas Roe
Kathleen Schnorf
Jamie Simler
Gary Will