



1900 K STREET, NW
SUITE 1200
WASHINGTON, DC 20006-1109



350 LINDEN OAKS DRIVE
SUITE 310
ROCHESTER, NY 14625

February 25, 2011

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

**Re: Filing of an Executed Standard Large Generator Interconnection Agreement
Among the New York Independent System Operator, Inc., New York State Electric
& Gas Corporation, and Howard Wind, LLC, and Request for Waiver of the
Commission's Prior Notice Requirement, 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 30.11.3 of its Large Facility Interconnection Procedures ("LFIP"), the New York Independent System Operator, Inc. ("NYISO") and New York State Electric & Gas Corporation ("NYSEG") (together, the "Joint Filing Parties") hereby tender for filing an executed Standard Large Generator Interconnection Agreement ("Agreement") among the NYISO, NYSEG, and the Developer,³ Howard Wind, LLC ("Howard Wind"). The Joint Filing Parties respectfully request waiver of the Commission's prior notice requirements to make the Agreement effective as of February 11, 2011. With the limited exception noted in Part I.B of this letter, the Agreement conforms to the NYISO's *pro forma* Large Generator Interconnection Agreement ("LGIA") that is contained in Attachment X of the NYISO's OATT.

I. Discussion

A. Background

Howard Wind's facility will have a total generating capacity of 62.5 MW and will consist of 25, 2.5 MW Clipper N90 double-fed asynchronous generators. The facility's Point of Interconnection is located on NYSEG's 115 kV Bath-Bennett line #953, as specified in Figure A-1 to Appendix A of the Agreement.

¹ 16 U.S.C. § 824d (2006).

² 18 C.F.R. § 35.12 (2010).

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").

B. Variations From the NYISO's *Pro Forma* LGIA

The Joint Filing Parties have agreed to modify Article 5.11 (“Connecting Transmission Owner’s Attachment Facilities Construction”) to provide that NYSEG “shall not transfer operational control of [its] Attachment Facilities and Stand Alone System Upgrade Facilities to the NYISO upon the completion of such facilities.” This change is necessary because the line to which the new facility will interconnect, NYSEG’s 115 kV Bath-Bennett line #953, is not subject to the NYISO’s operational control. Accordingly, the Joint Filing Parties request that the Commission permit this variation from the *pro forma* LGIA, which it has allowed under similar circumstances.⁴

II. Effective Date and Request for Waiver of the Prior Notice Requirement

The Joint Filing Parties request a waiver of the prior notice requirement under Section 35.3(a)⁵ of the Commission’s regulations to allow the Agreement to become effective as of February 11, 2011, the date the Agreement was executed. 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.⁶

III. Documents Submitted

The Joint Filing Parties submit the following documents:

1. this filing letter;
2. a clean version of the Agreement (“Attachment I”); and
3. blacklined sheets showing the changes from the body of the NYISO’s *pro forma* LGIA (“Attachment II”).

⁴ See *New York Independent System Operator, Inc., et al., Letter Order*, Docket No. ER09-905-000 (May 15, 2009).

⁵ 18 C.F.R. § 35.3(a).

⁶ See, e.g., *New York Independent System Operator, Inc. and Niagara Mohawk Power Corp., Letter Order*, Docket No. ER08-985-000 (June 26, 2008) (accepting interconnection agreement effective as of the date of execution); *New York Independent System Operator, Inc. and New York Power Authority, Letter Order*, Docket No. ER08-861-000 (May 27, 2008) (same).

IV. Communications and Correspondence

The following persons should be included in the official service list in this proceeding and all communications regarding this filing should be directed to:

For the NYISO

Robert E. Fernandez, General Counsel
*Karen Georgenson Gach, Deputy General Counsel
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
Tel: (518) 356-6000
Fax: (518) 356-4702
rfernandez@nyiso.com
kgach@nyiso.com

*J. Kennerly Davis⁷
Hunton & Williams LLP
951 East Byrd Street
Richmond, VA 23219
Tel: (804) 788-8559
Fax: (804) 788-8218
kdavis@hunton.com

Ted J. Murphy
*Vanessa A. Colón
Hunton & Williams LLP
1900 K Street, NW, Suite 1200
Washington, DC 20006-1109
Tel: (202) 955-1500
Fax: (202) 862-3616
vcolon@hunton.com

For NYSEG

*Mark A. Chier
Electric Transmission Services
New York Electric & Gas Corporation
18 Link Drive
Binghamton, NY 13904-3222
Tel: (607) 762-8073
Fax: (607) 762-8666
machier@nyseg.com

*Jeffrey R. Clark
Bond, Schoeneck & King, PLLC
350 Linden Oaks, Suite 310
Rochester, NY 14625-2825
Tel: (585) 362-4721
Fax: (585) 362-4701
jrclark@bsk.com

⁷ The NYISO respectfully requests waiver of 18 C.F.R. § 385.203(b)(3) (2011) to permit service on counsel for the NYISO in both Washington, DC and Richmond, VA.

V. Service

The NYISO will send a copy of this filing to NYSEG and Howard Wind. 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, the complete filing will be posted on the NYISO's website at www.nyiso.com.

VI. Conclusion

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

Respectfully submitted,

/s/Vanessa A. Colón

Vanessa A. Colón

Counsel for

New York Independent System Operator, Inc.

/s/Jeffrey R. Clark

Jeffrey R. Clark

Counsel for

New York Gas & Electric Corporation