

# Attachment I

**Matrix Describing Differences Between Cedar Rapids Transmission Project Interconnection Agreement  
(Service Agreement No. 2472) and Pro Forma LGIA**

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
<b>Recitals</b>	<b>Recitals</b>	Modified to described the purpose of the Interconnection Agreement, including providing: (i) the description of the Transmission Project; (ii) that Connecting Transmission Owner will construct, own, and operate certain facilities of the Transmission Project and related Network Upgrade Facilities; (iii) that Alcoa Power Generating Inc.’s Long Sault Division will construct certain other facilities pursuant to a separate engineering, procurement, and construction agreement; (iv) that Transmission Developer will be responsible for the costs of the Transmission Project and Network Upgrade Facilities; and (v) that the Transmission Developer will retain CRIS rights associated with the incremental transmission capacity created by the Transmission Project and Network Upgrade Facilities.
<b>Article 1</b>	<b>Article 1</b>	<b>Definitions</b>
		Modified to: (i) remove defined terms and definitions included in the Pro Forma LGIA that are unnecessary in the Interconnection Agreement and that could create confusion if retained, <sup>1</sup> (ii) revise definitions of certain defined terms for consistency with the modified

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<sup>1</sup> The removed defined terms are: Attachment Facilities, Commercial Operation, Commercial Operation Date, Connecting Transmission Owner’s Attachment Facilities, Developer, Developer’s Attachment Facilities, Distribution System, Distribution Upgrades, Emergency State, Energy Resource Interconnection Service, Generating Facility, Generating Facility Capacity, Interconnection Facilities Study, Interconnection Facilities Study Agreement, Interconnection Request, Interconnection Study, Interconnection System Reliability Impact Study, Large Generating Facility, Material Modification, NYISO Minimum Interconnection Standard, Point of Change of Ownership, Point of Interconnection, Retired, Stand Alone System Upgrade Facility, Standard Large Facility Interconnection Procedures, Standard Large Generator Interconnection Agreement, and System Upgrade Facilities.

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
		purpose and scope of the Interconnection Agreement, <sup>2</sup> and (iii) insert certain new defined terms required for the Interconnection Agreement. <sup>3</sup>
<b>Article 2</b>	<b>Article 2</b>	<b>Effective Date, Term and Termination</b>
Article 2.1	Article 2.1	Modified cross-reference to Article 3.1 to Article 3.
Article 2.2	Article 2.2	Conforming.
Article 2.3.1	Article 2.3.1	Modified to replace termination based upon a Large Generator Facility's retirement with termination following receipt of notice from the Transmission Developer indicating that it will not proceed with the Transmission Project and Network Upgrade Facilities.
Articles 2.3.2-2.3.3	Articles 2.3.2-2.3.3	Conforming.
Article 2.4	Article 2.4	Modified: (i) to detail Transmission Developer's cost responsibility for Network Upgrade Facilities in the event the Interconnection Agreement is terminated consistent with the forfeiture of Security requirements in Article 11 of the Interconnection Agreement, and (ii) to remove the references and requirements for Attachment Facilities and System Upgrade Facilities.
Reserved	Article 2.5	Not included in the Interconnection Agreement, as the provision concerns the disconnection of a Large Generator Facility.
Article 2.6	Article 2.6	Modified to remove land access requirements in survival provision, as neither Connecting Transmission Owner nor Transmission Developer will be placing facilities or equipment on the other's property.

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<sup>2</sup> The revised defined terms are: Applicable Reliability Standards, Base Case, Capacity Region, Capacity Resource Interconnection Service, Connecting Transmission Owner, Governmental Authority, Initial Synchronization Date, In-Service Date, Metering Equipment, NYISO Deliverability Interconnection Standard, Party, System Deliverability Upgrades, System Protection Facilities, and Trial Operation.

<sup>3</sup> The Joint Filing Parties inserted the following new defined terms: Class Year Interconnection Facilities Study, Facilities Study, Facilities Study Agreement, Network Upgrade Facilities, NYISO Transmission Interconnection Standard, Security, System Impact Study, System Impact Study Agreement, Transmission Developer, Transmission Interconnection Application, Transmission Interconnection Procedures, Transmission Interconnection Study, Transmission Project, and Transmission Project Interconnection Agreement.

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
<b>Article 3</b>	<b>Article 3</b>	<b>Regulatory Filings</b>
Article 3	Article 3	Modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 4</b>	<b>Article 4</b>	<b>Scope of Interconnection Service</b>
Article 4.1	Articles 4.1 and 4.1.1	Modified to reflect that Transmission Developer is eligible for Capacity Resource Interconnection Service and to remove reference to Point of Interconnection.
	Article 4.1.2	Not included in the Interconnection Agreement, as the provision concerns the operation of a Large Generating Facility.
Articles 4.2-4.3	Articles 4.2-4.3	Modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 5</b>	<b>Article 5</b>	<b>Transmission Project and Network Upgrade Facilities Engineering, Procurement, and Construction</b>
Articles 5.1	Articles 5.1	Modified to provide that Connecting Transmission Owner will design, procure, construct install, and own the Transmission Project and Network Upgrade Facilities and to remove requirements for facility types not being constructed under this Agreement.
Reserved	Articles 5.1.1-5.4	Not included in the Interconnection Agreement, as the provisions concern options for performance of the construction work, which the Connecting Transmission Owner will perform, and requirements concerning power system stabilizers for generating facilities.
Article 5.5	Article 5.5	Modified to provide that Connecting Transmission Owner will perform the design and engineering work, to remove reference to procurement of equipment, which will occur at a later stage for the Transmission Project, to clarify the reference to the Security and cost allocation requirements, and to modify defined terms to be consistent with Transmission Project-related defined terms.
Article 5.6	Article 5.6	Modified to provide that Connecting Transmission Owner will perform the equipment procurement and construction work, to clarify the stage at which the equipment procurement will occur, and to modify defined terms to be consistent with Transmission Project-related defined terms.
Article 5.7	Article 5.7	Modified to be consistent with Connecting Transmission Owner performing the work under the Interconnection Agreement and to remove requirements for Attachment Facilities.

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
Article 5.8	Article 5.8	Modified defined terms to be consistent with Transmission Project-related defined terms and to remove requirements for Attachment Facilities.
Reserved	Articles 5.9-5.11	Not included in the Interconnection Agreement, as the provisions concern limited operation of a Large Generating Facility and requirements for Attachment Facilities.
Article 5.12	Article 5.12	Modified to be consistent with Connecting Transmission Owner performing the work under the Interconnection Agreement on land that it owns or controls and to remove requirements applicable to Large Generating Facility.
Article 5.13	Article 5.13	Modified defined terms to be consistent with Transmission Project-related defined terms and to align requirements with transmission facilities.
Article 5.14	Article 5.14	Modified defined terms to be consistent with Transmission Project-related defined terms and clarified Connecting Transmission Owner's responsibility to assist in obtaining permits.
Reserved	Article 5.15	Not included in the Interconnection Agreement, as the provision concerns base case facilities not applicable to the agreement.
Article 5.16	Article 5.16	Modified defined terms to be consistent with Transmission Project-related defined terms and referenced the cost determinations in the Facilities Study report applicable to Transmission Projects in place of Attachment S of the OATT.
Article 5.17	Article 5.17	Modified to: (i) remove the statement of intent that payments will be non-taxable, related representations and covenants, and other provisions that apply to payments and property transfers qualifying for the safe harbor provided by IRS Notices 88-129, 2001-82, and 2016-36, <sup>4</sup> (ii) clarify the scope of Transmission Developer's income tax indemnification and gross-up obligations, and (iii) reflect defined terms consistent with Transmission Project-related defined terms.
Article 5.18	Article 5.18	Modified to remove references to the tax exempt status of certain New York Transmission Owners not a party to the agreement.
Article 5.19	Article 5.19	Modified to reflect the requirements of Attachment P to the NYISO OATT regarding modifications to a Transmission Project or Network Upgrade Facilities, to remove

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<sup>4</sup> IRS Notice 2016-36, which is not included in the Pro Forma LGIA, modifies and supersedes IRS Notices 2001-82 and 88-129.

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
		references to requirements for Attachment Facilities, and to modify defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 6</b>	<b>Article 6</b>	<b>Testing and Inspection</b>
Articles 6.1-6.4	Articles 6.1-6.4	Modified to reflect that Connecting Transmission Owner will be performing the work under the Interconnection Agreement, to align terms with a transmission facility rather than a generating facility, and to modify defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 7</b>	<b>Article 7</b>	<b>Metering</b>
Article 7.1	Article 7.1	Modified to address the existing metering/metering points associated with the facilities impacted by the Transmission Project, to remove requirements applicable to Points of Interconnection or a Large Generating Facility, and to modify defined terms to be consistent with Transmission Project-related defined terms.
Reserved.	Article 7.2	Not included in the Interconnection Agreement, as the provision concerns check meters at a Point of Interconnection.
Article 7.3	Article 7.3	Modified to provide that Connecting Transmission Owner will confirm adequacy of the existing metering on its system.
Articles 7.4-7.5	Article 7.4-7.5	Modified to align with the changes to the metering requirements elsewhere in Article 7 and to modify defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 8</b>	<b>Article 8</b>	<b>Communications</b>
Article 8.1-8.2	Article 8.1-8.2	Modified to align communication requirements with Connecting Transmission Owner's existing communication facilities applicable to transmission upgrades on its system and to modify defined terms to be consistent with Transmission Project-related defined terms.
Article 8.3	Article 8.3	Conforming.
<b>Article 9</b>	<b>Article 9</b>	<b>Operations</b>
Article 9.1	Article 9.1	Conforming.

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
Article 9.2	Article 9.2	Removed requirements concerning a Developer's operation of a Large Generating Facility and modified defined terms to be consistent with Transmission Project-related defined terms.
Article 9.3	Article 9.3	Modified to remove requirements concerning a Developer's operation of a Large Generating Facility and to insert requirement that Connecting Transmission Owner will be responsible for the operating and maintenance expenses associated with the Transmission Project and Network Upgrade Facilities, which will be incorporated into its transmission system.
Article 9.4	Article 9.4	Modified to be consistent with Connecting Transmission Owner's responsibility to place in-service the Transmission Project and Network Upgrade Facilities.
Reserved.	Article 9.5	Not included in the Interconnection Agreement, as the provision concerns real and reactive power control and primary frequency response requirements for a Large Generating Facility.
Reserved	Articles 9.6-9.6.3	Not included in the Interconnection Agreement, as the provision concerns outage requirements for Large Generating Facility.
Article 9.6.1	Article 9.6.4	Modified system protection and other control requirements to align with Transmission Project being constructed, owned, and operated by Connecting Transmission Owner.
Article 9.6.2	Article 9.6.5	Modified requirements for protection to remove protection equipment applicable to a Large Generating Facility and to modify defined terms to be consistent with Transmission Project-related defined terms.
Article 9.6.3	Article 9.6.6	Modified power quality requirements to align with the Transmission Project being constructed, owned, and operated by Connecting Transmission Owner.
Reserved.	Articles 9.7-9.8, 9.10	Not included in the Interconnection Agreement, as the provisions concern requirements applicable to a Large Generating Facility and Attachment Facilities, including switching and tagging rules, third-party access, and phasor measurement units.
Article 9.9	Article 9.9	Modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 10</b>	<b>Article 10</b>	<b>Maintenance</b>
Article 10.1	Article 10.1	Modified to remove reference to Attachment Facilities.

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
Reserved.	Articles 10.2-10.5	Not included in the Interconnection Agreement, as the provisions concern Developer and Connecting Transmission Owner requirements for a Large Generating Facility, Attachment Facilities, System Upgrade Facilities, and System Deliverability Upgrades.
<b>Article 11</b>	<b>Article 11</b>	<b>Performance Obligation</b>
Reserved.	Articles 11.1-11.2	Not included in the Interconnection Agreement, as the provisions concern requirements for Attachment Facilities.
Article 11.3	Article 11.3	Revised to reflect that Connecting Transmission Owner will design, procure, construct, install, and own the Transmission Project and Network Upgrade Facilities and modified defined terms to be consistent with Transmission Project-related defined terms.
Article 11.4	Article 11.4	Revised to address cost allocation requirements in the Facilities Study Report, rather than in Attachment S of the OATT and modified defined terms to be consistent with Transmission Project-related defined terms.
Article 11.5	Article 11.5	Modified to clarify Security mechanism for Network Upgrade Facilities consistent with Section 22.11.1 of Attachment P of the OATT and to clarify how Security may be used by Connecting Transmission Owner.
Article 11.6	Article 11.6	Not included in the Interconnection Agreement, as the provision concerns compensation of Large Generating Facility for emergency services. Inserted as new Article 11.6 requirements concerning the forfeiture of Security consistent with the upgrade requirements in Section 25.8.5 of Attachment S of the OATT.
Article 11.7	Article 11.7	Not included in the Interconnection Agreement, as the provision concerns line outage costs that Connecting Transmission Owner has elected not to recover. Inserted as new Article 11.7 requirements concerning the cost cap for Network Upgrade Facilities consistent with the upgrade requirements in Section 25.8.6 of Attachment S of the OATT.
<b>Article 12</b>	<b>Article 12</b>	<b>Invoice</b>
Articles 12.1-12.2, 12.4	Article 12.1-12.2, 12.4	Modified defined terms to be consistent with Transmission Project-related defined terms.
Article 12.3	Article 12.3	Conforming.
<b>Article 13</b>	<b>Article 13</b>	<b>Emergencies</b>



<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
Article 13.1	Article 13.1	Conforming.
Reserved.	Articles 13.2, 13.3, 13.5	Not included in the Interconnection Agreement, as the provisions concern emergency state requirements for a Large Generating Facility.
Article 13.4	Article 13.4	Removed requirements applicable to a Large Generating Facility and modified defined terms to be consistent with Transmission Project-related defined terms.
Article 13.6	Article 13.6	Modified to conform to modifications to Article 11.6.
<b>Article 14</b>	<b>Article 14</b>	<b>Regulatory Requirements and Governing Law</b>
Article 14.1	Article 14.1	Modified defined terms to be consistent with Transmission Project-related defined terms.
Article 14.2	Article 14.2	Conforming.
<b>Article 15</b>	<b>Article 15</b>	<b>Notices</b>
Articles 15.1-15.3	Articles 15.1-15.3	Conforming.
Article 15.4	Article 15.4	Modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 16</b>	<b>Article 16</b>	<b>Force Majeure</b>
Articles 16.1-16.2	Articles 16.1-16.2	Conforming.
<b>Article 17</b>	<b>Article 17</b>	<b>Default</b>
Articles 17.1-17.2	Articles 17.1-17.2	Conforming.
<b>Article 18</b>	<b>Article 18</b>	<b>Indemnity, Consequential Damages, and Insurance</b>
Articles 18.1.1-18.1.2	Articles 18.1.1-18.1.2	Conforming, except corrected defined terms for Indemnifying Party and Indemnified Party. <sup>5</sup>

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<sup>5</sup> The Commission has previously accepted the change in Section 18.1.2 to correct an inadvertent revision to the Pro Forma LGIA. *See, e.g., New York Independent System Operator, Inc. and Consolidated Edison Co. of New York, Inc.*, Letter Order, Docket No. ER18-1161-000 (May 17, 2018).

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
Article 18.3	Article 18.3	Modified to reflect that only Connecting Transmission Owner must procure insurance as it is the Party that will perform all of the work under the Interconnection Agreement and to correct certain internal cross references. <sup>6</sup>
<b>Article 19</b>	<b>Article 19</b>	<b>Assignment</b>
Article 19	Article 19	Removed reference to Attachment Facilities and modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 20</b>	<b>Article 20</b>	<b>Severability</b>
Article 20	Article 20	Modified to remove reference to Pro Forma LGIA provisions concerning construction options that were not included in the Interconnection Agreement.
<b>Article 21</b>	<b>Article 21</b>	<b>Comparability</b>
Article 21	Article 21	Conforming.
<b>Article 22</b>	<b>Article 22</b>	<b>Confidentiality</b>
Articles 22.1-22.3	Articles 22.1-22.3	Conforming.
Article 22.4	Article 22.4	Modified to correct internal cross-reference. <sup>7</sup>
Article 22.5	Article 22.5	Modified defined terms to be consistent with Transmission Project-related defined terms.
Articles 22.6-22.13	Articles 22.6-22.13	Conforming.
<b>Article 23</b>	<b>Article 23</b>	<b>Transmission Developer and Connecting Transmission Owner Notices of Environmental Releases</b>
Article 23	Article 23	Modified to reflect that Connecting Transmission Owner is performing all work under the Interconnection Agreement and modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Reserved.</b>	<b>Article 24</b>	<b>Information Requirement</b>

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<sup>6</sup> The Commission has previously accepted the changes to correct these cross references. *Id.*

<sup>7</sup> The Commission has previously accepted the change to correct this cross reference. *Id.*

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
Reserved.	Articles 24.1-24.4	Not included in the Interconnection Agreement, as the provisions concern the submission of information among parties regarding a Large Generating Facility and Attachment Facilities.
<b>Article 25</b>	<b>Article 25</b>	<b>Information Access and Audit Rights</b>
Articles 25.1-25.3, 25.5	Articles 25.1-25.3, 25.5	Conforming.
Article 25.4	Article 25.4	Modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 26</b>	<b>Article 26</b>	<b>Subcontractors</b>
Articles 26.1, 26.3	Articles 26.1, 26.3	Conforming.
Article 26.2	Article 26.2	Modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 27</b>	<b>Article 27</b>	<b>Disputes</b>
Articles 27.1-27.2, 27.4-27.5	Articles 27.1-27.2, 27.4-27.5	Conforming.
Article 27.3	Article 27.3	Modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 28</b>	<b>Article 28</b>	<b>Representations, Warranties and Covenants</b>
Articles 28.1, 28.1.2-28.1.4	Articles 28.1, 28.1.2-28.1.4	Conforming.
Article 28.1.1	Article 28.1.1	Modified defined terms to be consistent with Transmission Project-related defined terms.
<b>Article 29</b>	<b>Article 29</b>	<b>Miscellaneous</b>
Articles 29.1-29.2, 29.4, 29.6-29.7, 29.9-29.12, 29.14	Articles 29.1-29.2, 29.4, 29.6-29.7, 29.9-29.12, 29.14	Conforming.
Article 29.3	Article 29.3	Modified to replace reference to Standard Large Facility Interconnection Procedures with Transmission Interconnection Procedures.
Articles 29.5, 29.8, 29.13, 29.15	Articles 29.5, 29.8, 29.13, 29.15	Modified defined terms to be consistent with Transmission Project-related defined terms.

<b>Interconnection Agreement</b>	<b>Pro Forma LGIA</b>	<b>Modifications Reflected in the Interconnection Agreement</b>
<b>Appendices</b>	<b>Appendices</b>	
Appendix A	Appendix A	Modified to provide details of Transmission Project and Network Upgrade Facilities instead of Attachment Facilities and System Upgrade Facilities
Appendices B, C, D, and F	Appendices B, C, D, and F	Conforming.
Appendix E	Appendix E	Modified to reflect that Connecting Transmission Owner, not Developer, will provide notice that Transmission Project and Network Upgrade Facilities have been completed and are in-service.