

October 25, 2019

By Electronic Delivery

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

Re: Joint Filing of an Executed Amended and Restated Transmission Project Interconnection Agreement Among the New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and H.Q. Energy Services (U.S.) Inc.; Request for Waiver of the 60-Day Notice Period; Docket No. ER20-____-000

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act¹ and Section 35.13 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 Amended and Restated Transmission Project Interconnection Agreement entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and H.Q. Energy Services (U.S.) Inc. ("HQUS"), as the Transmission Developer (the "Amended Agreement").³ The Amended Agreement is labeled as Service Agreement No. 2472 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Amended Agreement for filing. The Amended Agreement conforms to the NYISO's *pro forma* Large Generator Interconnection Agreement ("Pro Forma LGIA") that is contained in Attachment X to the OATT with limited non-conforming exceptions previously accepted by the Commission for the prior version of this agreement. Further, as described in Part II of this letter, the Joint Filing Parties respectfully request a waiver of the Commission's prior notice requirements⁴ to make the Amended Agreement effective as of October 16, 2019, which is the date of its full execution.

¹ 16 U.S.C. § 824d (2012).

² 18 C.F.R. § 35.13 (2017).

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.

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).

I. Discussion

The Amended Agreement supersedes the Transmission Project Interconnection Agreement among the NYISO, National Grid, and HQUS (the “Original Agreement”) that was filed in Docket No. ER19-2645-000 on August 20, 2019,⁵ and was accepted by the Commission on September 26, 2019.⁶ The Original Agreement was based on and is consistent with the Pro Forma LGIA, but included certain non-conforming modifications required to address a Transmission Project, which were accepted by the Commission.

As described in the Amended Agreement, the Transmission Project will provide for an 80 MW increase in transmission capacity on the Cedar Rapids Transmission Intertie located in St. Lawrence County, New York, to increase imports from the Quebec Control Area to New York’s Rest of State region. The Transmission Project includes the reconductoring of National Grid’s 115 kV Alcoa-Dennison Line 12, the installation of a 25 MVAR rack mounted capacitor bank at National Grid’s Dennison Substation, and related Network Upgrade Facilities required for the Transmission Project to connect reliably to the New York State Transmission System in a manner that meets the NYISO Transmission Interconnection Standard. National Grid will construct, own, operate, and maintain the portion of the Transmission Project and Network Upgrade Facilities located on its transmission system.

The NYISO’s interconnection studies for the Transmission Project also identified impacts on an Affected System in New York – the transmission system of Alcoa Power Generating Inc.’s Long Sault Division (“APGI”), which is an Affected System Operator. The portion of the Transmission Project and Network Upgrade Facilities on APGI’s transmission system will be constructed, owned, operated, and maintained by APGI. The NYISO, APGI, and HQUS entered into a separate Engineering, Procurement, Construction, Operation, and Maintenance Agreement (“EPC Agreement”) concerning the work on the APGI transmission system. The EPC Agreement was fully executed on October 4, 2019, and filed at the Commission in Docket No. ER20-149-000 on October 21, 2019.

HQUS and National Grid agreed to update the milestones in the currently effective Original Agreement to align them with the milestones for related work included in the executed EPC Agreement. Accordingly, the NYISO, National Grid, and HQUS have amended the Original Agreement to reflect that this is the “Amended and Restated” Agreement and to insert the revised milestones in Appendix B of the Agreement. The Amended Agreement was fully executed on October 16, 2019 by the NYISO, National Grid, and HQUS. The Amended Agreement does not include variations from the Pro Forma LGIA other than those already accepted by the Commission for the Original Agreement.

⁵ *New York Independent System Operator, Inc., and Niagara Mohawk Power Corporation d/b/a National Grid*, Docket No. ER19-2645-000 (Aug. 20, 2019).

⁶ *New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid*, Letter Order, Docket No. ER19-2645-000 (Sept. 26, 2019).

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

The Joint Filing Parties request an effective date of October 16, 2019 for the Amended Agreement, which is the date of its full 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

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⁷ See, e.g., *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Letter Order, 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 Niagara Mohawk d/b/a National Grid

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IV. Documents Submitted

The Joint Filing Parties submit the following documents with this filing letter:

- A clean version of the Amended Agreement (Attachment I);
- A blacklined version of the Amended Agreement showing the changes from the Original Agreement (Attachment II); and
- The signature pages for the Amended Agreement (Attachment III).

V. Service

On behalf of the Joint Filing Parties, 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 Amended Agreement for filing with an effective date of October 16, 2019.

Respectfully submitted,

Sara B. Keegan
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New York Independent System Operator, Inc.*

Christopher J. Novak
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