

Kenna J. Hagan
Sr. Counsel/Avangrid Networks
180 Marsh Hill Road
Orange, CT 06477
kenna.hagan@avangrid.com
1.605.580.0239

February 7, 2022

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

**Re: *New York State Electric & Gas Corporation*
 Engineering and Procurement Agreement with Watkins Glen Solar Energy Center,
 LLC
 *Docket No. ER22-____-000***

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”)¹ and Part 35 of the Federal Energy Regulatory Commission’s (“Commission’s” or “FERC’s”) regulations,² New York State Electric & Gas Corporation (“NYSEG”) hereby submits for filing an executed Engineering and Procurement Agreement (“E&P Agreement”) by and between NYSEG and Watkins Glen Solar Energy Center, LLC (“Customer”). The E&P Agreement is designated as Service Agreement No. 2685 under the New York Independent System Operator, Inc.’s (“NYISO”) Open Access Transmission Tariff (“OATT”).

For the reasons set forth below, NYSEG respectfully requests that the Commission accept the E&P Agreement for filing effective January 10, 2022.

I. BACKGROUND AND DESCRIPTION OF THE E&P AGREEMENT

NYSEG is a public utility subject to the Commission’s jurisdiction that, among other things, owns transmission facilities under the operational control of the NYISO. Customer is a Delaware limited liability company engaged in the business of developing a 50 MW

¹ 16 U.S.C. §§ 824d.

² 18 C.F.R. Part 35.

photovoltaic solar energy generating facility located on private land in the Town of Dix in Schuyler County, New York (“Generation Facility”).

Customer is planning to construct the Generation Facility and has requested generator interconnection service from NYSEG for the Generation Facility. In order to advance implementation of the interconnection prior to the execution of an interconnection agreement, Customer has requested that NYSEG coordinate with Customer to begin certain engineering and procurement activities.

Customer has elected the option to build under the NYISO OATT and will be responsible for building the Customer Point of Interconnection (“POI”) substation (the “Watkins Glen Solar Substation”). Attachment A to the E&P Agreement identifies Customer’s attachment facilities, which include a solar energy collector station, generator tie line, and the substation (collectively, the developer’s attachment facilities or “DAFs”). Customer has retained its own engineers to perform the engineering, procurement and construction of the DAFs, with oversight of the engineering, design, and project management to be completed by NYSEG’s engineers. Attachment A also identifies NYSEG upgrades identified by the Interconnection Facilities Study.

Pursuant to the E&P Agreement, Customer will pay all of NYSEG’s costs in performing its scope of work set forth in Attachment A to the E&P Agreement, which includes review and oversight of Customer’s activities with the upgrades for which it is responsible.

II. EFFECTIVE DATE

Consistent with the terms of the E&P Agreement, NYSEG respectfully requests that the Commission accept the E&P Agreement effective as of January 10, 2022. The Commission has previously held that pre-interconnection service agreements may be filed within 30 days of service commencing rather than in advance of service commencement.³ The E&P Agreement is being submitted within 30 days after service commencement. The NYISO OATT contemplates that agreements such as the E&P Agreement may be part of generator interconnection service provided pursuant to the OATT, and thus the E&P Agreement is an agreement under an umbrella tariff rather than a stand-alone bilateral service agreement. The E&P Agreement is consistent with NYSEG’s provision of generator interconnection service pursuant to the NYISO OATT and granting the requested effective date will have no adverse effect on Customer, who has executed the E&P Agreement. In addition, granting the requested effective date will have no adverse effect on NYSEG or its other customers.

³ See, e.g., *International Transmission Co. and Michigan Electric Transmission Co., LLC*, 139 FERC ¶ 61,022, at P 14 & n.18. (2012)

III. LIST OF DOCUMENTS SUBMITTED WITH THIS FILING⁴

NYSEG is submitting the following documents with this filing:

1. This transmittal letter; and
2. The executed E&P Agreement.

IV. COMMUNICATIONS

Please direct all communications and correspondence in this proceeding to the individuals indicated below:

Kenna J. Hagan
Senior Counsel
Avangrid Service Company
180 Marsh Hill Road
Orange, CT 06477
Phone: (605) 580-0239
kenna.hagan@avangrid.com

Julie Mahoney
Manager, Program/Projects
Transmission Services
18 Link Dr., P.O. Box 5224
Binghamton, NY 13902-5224
Phone: (607) 761-6935
j_mahoney@nyseg.com

V. PERSONS ON WHOM THIS FILING IS BEING SERVED

A copy of this filing will be served on Customer and the NYISO.

VI. CONCLUSION

For the foregoing reasons, NYSEG respectfully requests that the Commission accept the E&P Agreement for filing, as submitted, without modification or condition, effective January 10, 2022.

Respectfully submitted,

/s/ Kenna J. Hagan

Kenna J. Hagan

Counsel for New York State Electric & Gas Corporation

Enclosure

⁴ 18 C.F.R. § 35.13(b)(1).