

October 4, 2024

By Electronic Delivery

Honorable Debbie-Anne A. Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Notice of Cancellation of Service Agreement No. 2572 to the New York
Independent System Operator, Inc.'s Open Access Transmission Tariff, Docket
No. ER25-____

Dear Ms. Reese:

Pursuant to Section 205(d) of the Federal Power Act¹ and Sections 35.9 and 35.15 of the Commission's regulations,² the New York Independent System Operator, Inc. ("NYISO") hereby tenders for filing and acceptance a Notice of Cancellation of the Amended and Restated Small Generator Interconnection Agreement ("Amended Agreement") for the Bakerstand Solar project (NYISO Queue Position No. 667) among the NYISO, Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid") as the Connecting Transmission Owner, and Bakerstand Solar, LLC ("Bakerstand") as the Interconnection Customer. The Amended Agreement is designated as Service Agreement No. 2572 of the NYISO's Open Access Transmission Tariff ("OATT"). National Grid and Bakerstand have indicated to the NYISO that neither party opposes this filing.

I. Background

The Amended Agreement was fully executed by the Parties on December 29, 2021 and superseded the Small Generator Interconnection Agreement ("Original Agreement") previously executed by the Parties on November 16, 2020. The Amended Agreement addressed the interconnection of Bakerstand's proposed 20 MW solar powered electricity generation project to National Grid's transmission system. The Amended Agreement included certain non-conforming revisions to the NYISO's *pro forma* Small Generator Interconnection Agreement located in Attachment Z of the NYISO OATT and was filed with, and accepted by, the Commission.³

¹ 16 U.S.C. § 824d.

² 18 C.F.R. §§ 35.9, 35.15 (2024).

³ *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER22-795-000 (Mar. 9, 2022).

The Original Agreement also included certain non-conforming revisions to the NYISO's *pro forma* Small Generator Interconnection Agreement located in Attachment Z of the NYISO OATT and was filed with, and accepted by, the

II. Notice of Cancellation

Article 3.3.1 of the Amended Agreement provides that the “Interconnection Customer may terminate this Agreement at any time by giving the NYISO and Connecting Transmission Owner 20 Business Days written notice.” Article 3.3 further provides that the termination of the agreement will not be effective: “until the Parties have complied with all Applicable Laws and Regulations applicable to such termination, including the filing with FERC of a notice of termination of this Agreement (if required), which notice has been accepted for filing by FERC.”

On August 22, 2024, Bakerstand provided written notice (dated August 22, 2024) to the NYISO and National Grid that it was acting pursuant to Article 3.3.1 to terminate the Amended Agreement (“Termination Notice”). A copy of the Termination Notice is included as Attachment I. The twenty (20) Business Day period was completed on September 27, 2024. The parties have confirmed that there are no remaining obligations under the Amended Agreement.

Therefore, pursuant to Article 3.3 of the Amended Agreement, the Amended Agreement is terminated, subject to the Commission accepting this notice terminating the agreement. Accordingly, the NYISO hereby submits this Notice of Cancellation of Service Agreement No. 2572 of the NYISO OATT for the Commission’s acceptance.

III. Requested Effective Date

The NYISO respectfully requests that the proposed cancellation become effective on December 4, 2024 (*i.e.*, the day after the end of the statutory 60-day notice period).

IV. Documents Submitted

The NYISO submits the following document with this filing letter:

- Bakerstand’s August 29, 2024 Termination Notice (dated August 22, 2024) (Attachment I).

V. Communications and Correspondence

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

For the NYISO

Robert E. Fernandez, Executive Vice
President, Chief Compliance Officer &
General Counsel

*Ted J. Murphy
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VI. Service

A complete copy of this filing will be posted on the NYISO's website at www.nyiso.com. The NYISO will send an electronic link to this filing to the official representative of each of its customers and to each participant on its stakeholder committees. In addition, the NYISO will send an electronic copy of this filing to the New York Public Service Commission and to the New Jersey Board of Public Utilities.

VII. Conclusion

Wherefore, the NYISO respectfully requests that the Commission accept this Notice of Cancellation.

Respectfully submitted,

/s/ Sara B. Keegan

Sara B. Keegan, Assistant General Counsel
New York Independent System Operator, Inc.

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|-----|----------------------|----------------|-----------------|
| cc: | Janel Burdick | Jette Gebhart | David Morenoff |
| | Emily Chen | Leanne Khammal | Jason Rhee |
| | Matthew Christiansen | Jaime Knepper | Douglas Roe |
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