

December 17, 2024

By Electronic Delivery

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

Re: Joint Filing of an Executed Amended and Restated Small Generator Interconnection Agreement Among New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and Dolan Solar, LLC; Request for Waiver of the 60-Day Notice Period; Docket No. ER25-____-000

Dear Ms. Reese:

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 Small Generator Interconnection Agreement entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and Dolan Solar, LLC ("Dolan"), as the Interconnection Customer (the "Amended Agreement").³ The Amended Agreement is labeled as Service Agreement No. 2720 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* Small Generator Interconnection Agreement ("Pro Forma SGIA") that is contained in Attachment Z to the OATT with limited non-conforming revisions that were 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 December 3, 2024, which is the date of its full execution.

¹ 16 U.S.C. § 824d.

² 18 C.F.R. § 35.13 (2024).

³ Capitalized terms that are not otherwise defined in this filing letter shall have the meaning specified in Attachments S, X, or Z 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 Small Generator Interconnection Agreement for the Small Generating Facility among the NYISO, National Grid, and Dolan that was filed in the Commission's Docket ER22-2627-000 on August 10, 2022, and was accepted by the Commission on September 21, 2022 (the "Original Agreement").⁵ The Original Agreement was based on and is consistent with the Pro Forma SGIA, but included certain non-conforming modifications, which were accepted by the Commission.

Dolan is constructing a 20 MW solar generating facility in the town of Fort Edward, New York (the "Facility"). The Facility will interconnect to certain facilities of National Grid that are part of the New York State Transmission System. Additional details regarding the Facility can be found in Attachment 2 of the Interconnection Agreement.

Subsequent to the effective date of the Original Agreement, Dolan proposed to update its Commercial Operation Date ("COD"), which the NYISO determined was not material, and made related updates to the milestone dates set forth in Attachment 4 of the Original Agreement. Accordingly, the NYISO, National Grid, and Dolan have revised Attachment 4 of the Original Agreement to reflect the revised COD and updated milestone dates. In addition, the parties updated the description of upgrades in Attachment 6 to add certain work that will be required at the Facility's collector substation as an affected system in connection with the interconnection of another project – the Somers Solar project (NYISO Queue Position No. 1015). Finally, the parties revised the Original Agreement to reflect that this is an "Amended and Restated" version of the agreement.

The Amended Agreement does not include variations from the Pro Forma SGIA other than those already accepted by the Commission for the prior version of the agreement. Therefore, the Joint Filing Parties respectfully request that the Commission accept the Amended Agreement.

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

The Joint Filing Parties request an effective date of December 3, 2024, 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.⁶

⁵ *New York Independent System Operator, Inc., et al.*, Letter Order, Docket No. ER22-2627 (Sept. 21, 2022).

⁶ *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*

III. Communications and Correspondence

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

For the NYISO⁷

Robert E. Fernandez, Executive Vice
President, General Counsel, & Chief
Compliance Officer
Karen Georgenson Gach, Deputy General
Counsel
*Sara B. Keegan, Assistant General Counsel
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
Tel: (518) 356-6000
Fax: (518) 356-4702
skeegan@nyiso.com

*Ted J. Murphy
Hunton Andrews Kurth LLP
2200 Pennsylvania Avenue, NW
Washington, D.C. 20037
Tel: (202) 955-1500
Fax: (202) 778-2201
tmurphy@hunton.com

Michael J. Messonnier Jr.
*Matthew A. Stuart
Hunton Andrews Kurth LLP
951 East Byrd Street
Richmond, VA 23219
Tel: (804) 788-8200
Fax: (804) 344-7999
mmessonnier@hunton.com
mstuart@hunton.com

For Niagara Mohawk Power Corporation d/b/a National Grid

*Christopher J. Novak
Senior Counsel
National Grid
170 Data Drive
Waltham, MA 02451
Tel: 781-907-2112
Fax: 781-296-8091
Chris.Novak@nationalgrid.com

*Designated to receive service.

System Operator, Inc. and New York Power Authority, Letter Order, Docket No. ER08-699-000 (May 16, 2008) (same).

⁷ The NYISO respectfully requests waiver of 18 C.F.R. § 385.203(b)(3) (2024) to permit service on counsel in both Washington, D.C. and Richmond, VA.

IV. Documents Submitted

The Joint Filing Parties respectfully 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

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.

VI. Conclusion

Wherefore, the Joint Filing Parties respectfully request that the Commission accept the Amended Agreement for filing with an effective date of December 3, 2024.

Respectfully submitted,

/s/ Sara B. Keegan

Sara B. Keegan

Counsel for the

New York Independent System Operator, Inc.

/s/ Christopher J. Novak

Christopher J. Novak

Counsel for

*Niagara Mohawk Power Corporation d/b/a
National Grid*

cc:	Janel Burdick	Jette Gebhart	David Morenoff
	Emily Chen	Leanne Khammal	Jason Rhee
	Matthew Christiansen	Jaime Knepper	Douglas Roe
	Jignasa Gadani	Kurt Longo	Eric Vandenberg