

February 10, 2025

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 Second Amended and Restated Small Generator Interconnection Agreement for the Regan Solar Project (Queue No. 748) Among the New York Independent System Operator, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and Regan 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 Second Amended and Restated Small Generator Interconnection Agreement for the Regan Solar project (NYISO Queue No. 748) entered into by the NYISO, National Grid, as the Connecting Transmission Owner, and Regan Solar, LLC ("Regan"), as the Interconnection Customer (the "Second Amended Agreement").³ The Second Amended Agreement is labeled as Service Agreement No. 2574 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Second Amended Agreement for filing. The Second 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 exceptions previously accepted by the Commission for the prior versions 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 Second Amended Agreement effective as of January 27, 2025, 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

A. Background

The Second Amended Agreement supersedes the Amended and Restated Small Generator Interconnection Agreement among the NYISO, National Grid, and Regan that was filed in the Commission's Docket No. ER23-1510-000 on March 29, 2023,⁵ and was accepted by the Commission on May 22, 2023 (the "First Amended Agreement").⁶ This agreement superseded the Small Generator Interconnection Agreement among the NYISO, National Grid, and Regan that was filed in the Commission's Docket No. ER21-452-000 on November 23, 2020,⁷ and was accepted by the Commission on January 13, 2021 (the "Original Agreement").⁸ The First Amended Agreement and the Original Agreement were based on and are consistent with the Pro Forma SGIA, but included certain non-conforming modifications, which were accepted by the Commission for the Original Agreement.

Regan has constructed a 20 MW solar electricity generation facility located in Montgomery County, New York (the "Facility"). The Facility is interconnected 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 Second Amended Agreement.

Subsequent to the effective date of the First Amended Agreement, National Grid and Regan agreed to change the telecommunications equipment for the Facility set forth in Attachment 2 of the First Amended Agreement to align with available service. The parties also agreed to update the milestone table set forth in Attachment 4 of the First Amended Agreement. The NYISO determined that the changes agreed to by Regan and National Grid were non-material, and Regan elected to move forward with amending the First Amended Agreement.

Accordingly, the NYISO, National Grid, and Regan have revised Attachment 2 of the First Amended Agreement to reflect the change in equipment, and revised Attachment 4 of the First Amended Agreement to reflect the updated milestone table. In addition, the NYISO,

⁵ *New York Independent System Operator and Niagara Mohawk Power Corporation d/b/a National Grid*, Docket No. ER23-1510-000 (Mar. 29, 2023).

⁶ *New York Independent System Operator and Niagara Mohawk Power Corporation d/b/a National Grid*, Letter Order, Docket No. ER23-1510-000 (May 22, 2023).

⁷ *New York Independent System Operator and Niagara Mohawk Power Corporation d/b/a National Grid*, Docket No. ER21-452-000 (Nov. 23, 2020).

⁸ *New York Independent System Operator and Niagara Mohawk Power Corporation d/b/a National Grid*, Letter Order, Docket No. ER21-452-000 (Jan. 13, 2021).

National Grid, and Regan have revised the First Amended Agreement to reflect that this is a “Second Amended and Restated” agreement and updated contact information in Article 13.

B. The Interconnection Agreement Closely Conforms to the Pro Forma SGIA Contained in Attachment Z of the NYISO OATT

The Second Amended Agreement was fully executed on January 27, 2025, by the NYISO, National Grid, and Regan. The Second Amended Agreement largely conforms to the language in the Pro Forma SGIA contained in Attachment Z of the NYISO OATT and does not include non-conforming variations from the Pro Forma SGIA other than those already accepted by the Commission for the Original Agreement. Therefore, the Joint Filing Parties respectfully request that the Commission accept the Second 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 January 27, 2025, for the Second 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.⁹

⁹ 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).

III. Communications and Correspondence

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

For the NYISO¹⁰

Robert E. Fernandez, Executive Vice
President, Chief Compliance Officer &
General Counsel
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.
*Sevren R. Gourley
Hunton Andrews Kurth LLP
951 East Byrd Street
Richmond, VA 23219
Tel: (804) 788-8200
Fax: (804) 344-7999
mmessonnier@huntonak.com
sgourley@huntonak.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.

¹⁰ 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 submit the following documents with this filing letter:

- A clean version of the Second Amended Agreement (Attachment I);
- A blacklined version of the Second Amended Agreement showing the changes from the First Amended Agreement (Attachment II); and
- The signature pages for the Second 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 Second Amended Agreement for filing with an effective date of January 27, 2025.

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 |