

THIS FILING LETTER DOES NOT CONTAIN ANY CEII. ATTACHMENTS I, II, AND IV DO NOT CONTAIN ANY PRIVILEGED OR CONFIDENTIAL INFORMATION. ATTACHMENT III INCLUDES A ONE-LINE SCHEMATIC FOR WHICH CEII DESIGNATION IS REQUESTED IN PART III BELOW, AND IS SUBMITTED SEPARATELY.

May 22, 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 Amended and Restated Large Generator Interconnection Agreement for the High Bridge Wind Project Among the New York Independent System Operator, Inc., New York State Electric & Gas Corporation, and High Bridge Wind, LLC; Request for Critical Energy Infrastructure Information Designation; and 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 New York State Electric & Gas Corporation ("NYSEG") (together, the "Joint Filing Parties") hereby tender for filing an executed Amended and Restated Large Generator Interconnection Agreement for the High Bridge Wind project (NYISO Queue No. 706) entered into by the NYISO, NYSEG, as the Connecting Transmission Owner, and High Bridge Wind, LLC ("High Bridge Wind"), as the Developer (the "Amended Agreement").³ The Amended Agreement is labeled as Service Agreement No. 2657 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 certain limited non-conforming exceptions previously accepted by the

¹ 16 U.S.C. § 824d.

² 18 C.F.R. § 35.13 (2025).

³ Capitalized terms that are not otherwise defined in this filing letter shall have the meaning specified in Attachments S, X, or HH of the NYISO OATT, and if not defined therein, in the NYISO OATT and NYISO Market Administration and Control Area Services Tariff.

Commission for the prior version of this agreement and certain additional exceptions described in Part I.B of this letter. 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 May 8, 2025, which is the date of its full execution. Finally, as described in Part III of this letter, NYSEG requests that the one-line diagram included in the Amended Agreement be protected from disclosure as Critical Energy Infrastructure Information.

I. Discussion

A. Background

High Bridge Wind is constructing a wind farm located in Chenango, New York (the "Facility"). The Facility will interconnect to NYSEG's new High Bridge Substation in the new bay between new 145kV breakers B2 and B3. The Amended Agreement supersedes the Large Generator Interconnection Agreement among the NYISO, NYSEG, and High Bridge Wind that was filed in the Commission's Docket No. ER22-1472-000 on March 28, 2022, and was accepted by the Commission on May 26, 2022 (the "Original Agreement").⁵ The Original Agreement was based on and is consistent with the Pro Forma LGIA, but included certain non-conforming modifications, which were accepted by the Commission.

Subsequent to the effective date of the Original Agreement, High Bridge Wind 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 Appendix B of the Original Agreement. Accordingly, the NYISO, NYSEG, and High Bridge Wind have revised Appendix B of the Original Agreement to reflect the revised COD and the related updates to the milestone dates.

The NYISO, NYSEG, and High Bridge Wind have also agreed to the following additional revisions to the Original Agreement.

- Updating NYSEG's estimated amount for oversight costs in Article 5.2.12;
- Revising the description of certain required equipment and specifications in Appendix A;
- Revising the work responsibilities concerning certain System Upgrade Facilities in Appendix A;
- Removing language in Appendices A and C of the Original Agreement concerning the joint ownership and use of Interconnection Facilities between the Facility and another

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).

⁵ *N.Y. Indep. Sys. Operator, Inc. and N.Y. State Gas & Elec. Corp.*, ER22-1472-000, Letter Order (May 26, 2022).

project that is no longer required as the other project subsequently withdrew from the NYISO's Queue;

- Updating certain contact information in Appendix F; and
- Revising the agreement to indicate that this is the "Amended and Restated" version of the agreement.

The parties also agreed to include certain additional non-conforming modifications to the agreement, which are described in Section I.B of this letter.

B. The Amended Agreement Closely Conforms to the Pro Forma LGIA Contained in Attachment X of the NYISO OATT

The Amended Agreement was fully executed on May 8, 2025 by the NYISO, NYSEG, and High Bridge Wind. The Amended Agreement largely conforms to the language in the Pro Forma LGIA contained in Attachment X of the NYISO OATT with certain limited non-conforming exceptions previously accepted by the Commission for the prior version of this agreement and two additional exceptions described below in this Part I.B. The Joint Filing Parties submit that the changes specified below satisfy the Commission's standard for variations from the Pro Forma LGIA because unique circumstances exist that require a non-conforming agreement.⁶ The Joint Filing Parties, therefore, respectfully request that the Commission accept the Amended Agreement with the non-conforming changes.

1. Modifications to Address Phasor Measurement Unit Requirements

Article 9.10 of the Pro Forma LGIA requires Developers to install, at their expense, a phasor measurement unit ("PMU") on the low side of the step-up transformer, along with related PMU equipment, and to collect and transmit PMU data to the NYISO and to the Connecting Transmission Owner. The NYISO introduced the PMU requirements in the Pro Forma LGIA in 2017 to enhance the NYISO's ability to monitor the transmission grid for the New York Control Area and to determine real-time grid stability margins.⁷

The PMU requirements require a Developer to install a PMU on the low side of the transformer and then transmit the PMU data via the Connecting Transmission Owner's system. NYSEG, however, does not currently possess the capability to obtain the data from High Bridge Wind or to transmit the data to the NYISO, and the NYISO is unable at this time to accept PMU data directly from High Bridge Wind. The parties therefore agreed to reserve Article 9.10 and

⁶ See, e.g., *New York Independent System Operator, Inc. and New York State Electric & Gas Corporation*, Letter Order, Docket No. ER21-154-000 (Dec. 17, 2020) (accepting interconnection agreement effective as of date of execution); see also *PJM Interconnection, LLC*, 111 FERC ¶ 61,163 at PP 10-11, *reh'g denied*, 112 FERC ¶61,282 (2005).

⁷ See *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER18-80-000 (Dec. 7, 2017) (accepting NYISO's tariff revisions to improve its interconnection process, including the insertion of PMU requirements in Article 9.10 of the Pro Forma LGIA).

not apply the PMU requirements to the Amended Agreement. The Commission has previously accepted this change to NYISO's interconnection agreements.⁸

2. Modifications for Billing Arrangements

NYSEG and High Bridge Wind have agreed to an alternative billing arrangement for High Bridge Wind to make advanced payments to NYSEG for NYSEG's oversight costs. Accordingly, the parties have agreed to modify Article 12.1 of the Interconnection Agreement to reference the details of the alternative billing arrangement, which are set forth in Section 3 of Appendix B of the Amended Agreement. The Commission has previously accepted this change to NYISO's interconnection agreements.⁹

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

The Joint Filing Parties request an effective date of May 8, 2025 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.¹⁰

III. Request for CEII Treatment

Pursuant to Sections 388.112 and 388.113 of the Commission's regulations,¹¹ NYSEG requests that the one-line diagram included as Figure 1 in Appendix A of the Amended Agreement be protected from disclosure as Critical Energy Infrastructure Information ("CEII").¹²

⁸ See, e.g., *New York Independent System Operator, Inc., et al.*, Letter Order, Docket No. ER23-78-000 (Dec. 6, 2022) (accepting non-conforming revisions to reserve phasor measurement unit requirements).

⁹ See, e.g., *New York Independent System Operator, Inc.*, Letter Order, Docket No. ER22-1887-000 (July 14, 2022) (accepting non-conforming revisions for alternative billing arrangement with other project).

¹⁰ 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).

¹¹ 18 C.F.R. §§ 388.112 and 388.113.

¹² As required by Section 388.113(d)(1)(i) of the Commission's regulations, NYSEG has described in the filing letter how the one-line diagram in Figure 1 of Appendix A satisfies the definition of critical energy infrastructure information as that term is defined in Section 388.113(c)(1). In addition, as required by Section 388.113(d)(1)(ii) the cover page of the filing letter and the relevant page of the Amended Agreement that contains critical energy infrastructure information is labelled as including CEII and marked DO NOT RELEASE, and a Public and CEII version of the Amended Agreement are being filed with this letter. The CEII material is redacted in the Public version. Finally, as required by Section 388.113(d)(1)(i), NYSEG requests that the Commission designate the CEII material submitted on May 22, 2025, with the full five-year CEII designation provided for in

The diagram contains detailed, one-line schematics of NYSEG's facilities that, if disclosed, could pose a threat to the security and the reliability of the New York State bulk power system. The diagram provides more than simply the general location of critical infrastructure. Unlike publicly available maps of power transmission lines and generation and substation facilities, the schematics show the exact nature and specific location of facilities used to maintain the reliability of the New York State bulk power system.

The diagram, in NYSEG's assessment, reveals such critical information related to the facilities depicted therein that, if disclosed, could be useful to a person seeking to disable the power grid. Therefore, the disclosure of the CEII diagram would pose a threat to the reliability of the New York State bulk power system and the health and safety of New York residents. Moreover, the information revealed in this schematic reveals CEII, which the Commission has determined to be exempt from mandatory disclosure under 5 U.S.C. § 552(b)(7)(F). The diagrams have been omitted from the Public version of the Amended Agreement included in this filing.

The Joint Filing Parties are electronically submitting a non-public version of this filing. The diagram is included only in the non-public version of the Amended Agreement in the filing. The non-public diagram is marked: "**FIGURE CONTAINS CEII – DO NOT RELEASE PURSUANT TO 18 C.F.R. §§ 388.112 and 388.113.**" The non-public diagram should be treated as CEII reviewable by Commission Staff. In accordance with the Commission's April 14, 2017 notice on labeling of non-public information, each page of the non-public version of the filing is marked "**CUI//CEII.**"¹³ A placeholder has been included in place of the non-public diagram in the public version of the Amended Agreement.

All communications relating to this request for privileged and confidential treatment should be addressed to NYSEG's Counsel listed below.

IV. Communications and Correspondence

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

Section 388.113(e)(1) as the information provided in the one-line diagrams will continue to satisfy the definition of critical energy infrastructure information for this entire period.

¹³ See Notice of Document Labelling Guidance for Documents Submitted to or Filed with the Commission or Commission Staff (Apr. 14, 2017) (unreported).

For the NYISO¹⁴

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¹⁴ The NYISO respectfully requests waiver of 18 C.F.R. § 385.203(b)(3) (2025) to permit service on counsel in both Washington, D.C. and Richmond, VA.

V. Documents Submitted

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

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

VI. 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.

VII. Conclusion

Wherefore, the Joint Filing Parties respectfully request that the Commission accept the Amended Agreement for filing with an effective date of May 8, 2025.

Respectfully submitted,

/s/ Sara B. Keegan

Sara B. Keegan

Counsel for the

New York Independent System Operator, Inc.

/s/ Jeffrey A. Rosenbloom

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