

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.

September 9, 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 Standard Interconnection Agreement for the White Creek Solar Project (Queue Position No. 777) Among the New York Independent System Operator, Inc., Rochester Gas and Electric Corporation, and White Creek Solar LLC; Request for Waiver of the 60-Day Notice Period; and Request for Critical Energy Infrastructure Information Designation; Docket No. ER25-____-000

Dear Ms. Reese:

Pursuant to Section 205 of the Federal Power Act¹ and Section 35.13 of the Federal Energy Regulatory Commission's ("Commission") regulations,² the New York Independent System Operator, Inc. ("NYISO") and Rochester Gas and Electric Corporation ("RG&E") (together, the "Joint Filing Parties") hereby tender for filing an executed Standard Interconnection Agreement for the White Creek Solar project (NYISO Queue Position No. 777) entered into by the NYISO, RG&E, as the Connecting Transmission Owner, and White Creek Solar LLC ("White Creek"), as the Interconnection Customer (the "Interconnection Agreement").³ The Interconnection Agreement is labeled as Service Agreement No. 2904 under the NYISO's Open Access Transmission Tariff ("OATT").

The Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing. With the limited exceptions described in Part I of this letter, the Interconnection Agreement conforms to the NYISO's *pro forma* Standard Interconnection Agreement ("Pro Forma IA") that is contained in Attachment HH to the OATT.

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 HH of the NYISO OATT, and if not defined therein, in the NYISO OATT and NYISO Market Administration and Control Area Services Tariff.

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 Interconnection Agreement effective as of August 25, 2025, which is the date of its full execution. Finally, as described in Part III of this letter, RG&E requests that the one-line diagram included in the Interconnection Agreement be protected from disclosure as Critical Energy Infrastructure Information.

I. Discussion

A. Background

White Creek is constructing a 135 MW solar facility that will be located in Livingston County, New York (the "Facility"). Additional details regarding the Facility can be found in Appendix A of the Interconnection Agreement. The Facility will interconnect to certain facilities of RG&E that are part of the New York State Transmission System. The Point of Interconnection will be at the new White Creek Solar Switching Station on RG&E's existing 115 kV L906 transmission line, approximately 25.6 miles from RG&E's existing Station 82 Substation and 3.9 miles from RG&E's existing Station 128 Substation. Figure A-1 of Appendix A of the Interconnection Agreement provides a one-line diagram showing the Point of Interconnection.

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

The Interconnection Agreement was fully executed on August 25, 2025, by the NYISO, RG&E, and White Creek. The Interconnection Agreement largely conforms to the language in the Pro Forma IA contained in Attachment HH of the NYISO OATT with the 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 IA, because unique circumstances exist that require a non-conforming agreement.⁵ Therefore, the Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement with the non-conforming changes.

1. Modification to Address Phasor Measurement Unit Requirements

Article 9.10 of the Pro Forma IA requires Interconnection Customers 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 its interconnection agreements in 2017 to enhance the NYISO's ability to monitor the transmission

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 See, e.g., *PJM Interconnection, LLC*, 111 FERC ¶ 61,163 at PP 10-11, reh'g denied, 112 FERC ¶ 61,282 (2005).

grid for the New York Control Area and to determine real-time grid stability margins.⁶

The PMU requirements require that the Interconnection Customer transmit the PMU data via the Connecting Transmission Owner's system. RG&E, however, does not currently possess the capability to obtain the data from White Creek or to transmit the data to the NYISO, and the NYISO is unable at this time to accept PMU data directly from White Creek. The parties therefore agreed to reserve Article 9.10 and not apply the PMU requirements to the Interconnection Agreement. The Commission has previously accepted this change to NYISO's interconnection agreements.⁷

2. Modifications for Billing Arrangements

White Creek and RG&E have agreed to an alternative billing arrangement for White Creek to make advance payments to RG&E for RG&E's work performed under the Interconnection Agreement. 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 Interconnection Agreement. The Commission has previously accepted this change to NYISO's interconnection agreements.⁸

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

The Joint Filing Parties request an effective date of August 25, 2025, for the Interconnection 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.⁹ The Commission has previously permitted interconnection agreements to become effective upon the date of execution.¹⁰

⁶ 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 NYISO's *pro forma* Large Generator Interconnection Agreement).

⁷ 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).

⁸ 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).

⁹ The Commission generally grants waiver of the 60-day prior notice requirement when a service agreement is submitted for filing within 30 days of the agreement's effective date. See Prior Notice Filing Requirements Under Part II of the Federal Power Act, 64 FERC ¶ 61,139 (1993).

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).

III. Request for CEII Treatment

Pursuant to Sections 388.112 and 388.113 of the Commission's regulations,¹¹ RG&E requests that the one-line diagram included as the figure in Appendix A of the Interconnection Agreement be protected from disclosure as Critical Energy Infrastructure Information ("CEII").¹² The diagram contains detailed, one-line schematics of RG&E'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 schematic shows the exact nature and specific location of facilities used to maintain the reliability of the New York State bulk power system.

The diagram, in RG&E'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 diagram has been omitted from the Public version of the Interconnection 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 Interconnection 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 Interconnection Agreement.

¹¹ 18 C.F.R. §§ 388.112 and 388.113 (2025).

¹² As required by Section 388.113(d)(1)(i) of the Commission's regulations, RG&E has described in the filing letter how the one-line diagram in Appendix A satisfies the definition of critical energy infrastructure information as that term is defined in Section 388.113(c)(2). In addition, as required by Section 388.113(d)(1)(ii) the cover page of the filing letter and the relevant page of the Interconnection 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 Interconnection 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), RG&E requests that the Commission designate the CEII material submitted on September 9, 2025, with the full five-year CEII designation provided for in 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).

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

IV. Communications and Correspondence

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

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

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 Joint Filing Parties respectfully request that the Commission accept the Interconnection Agreement for filing with an effective date of August 25, 2025.

Respectfully submitted,

/s/ Sara B. Keegan

Sara B. Keegan

Counsel for the

New York Independent System Operator, Inc.

/s/ Jeffrey A. Rosenbloom

Jeffrey A. Rosenbloom

Counsel for New York State Electric & Gas Corporation

cc: Janel Burdick
Emily Chen
Jignasa Gadani
Jette Gebhart
Leanne Khammal

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David Morenoff
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