



March 29, 2013

By Electronic Filing

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Niagara Mohawk Power Corporation d/b/a/ National Grid – Proposed
Amendments to the Wholesale Transmission Service Charge Under the NYISO
Open Access Transmission Tariff - Docket No. ER13-**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d, and Part 35.13 of the Commission's Regulations, 18 C.F.R. Part 35.13, Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid" or "Company") submits for filing revisions to the FERC Open Access Transmission Tariff ("OATT") administered by the New York Independent System Operator, Inc. ("NYISO").¹ The proposed changes are being made to certain National Grid-specific components of the Wholesale Transmission Service Charge ("Wholesale TSC") formula under the NYISO OATT. The primary purpose of this filing, in addition to certain ministerial changes, is to amend National Grid's Scheduling, System Control and Dispatch Costs ("CCC") formula under the Wholesale TSC to incorporate costs incurred by the Company for Reliability Support Services ("RSS"), which are for the purpose of securing the ongoing reliability of National Grid's transmission system. National Grid requests that these changes be allowed to become effective for transmission services rendered on and after July 1, 2013. National Grid respectfully submits that its proposal is just and reasonable and should be accepted without suspension or hearing.

I. Statement of Nature, Reasons and Basis for Filing

The primary objective of this filing is to incorporate RSS expenses into the CCC component of the Company's Wholesale TSC formula rate set forth in Attachment H to the NYISO OATT. RSS expenses consist of payments made by the Company to generators for the specific purpose of maintaining reliability on the Company's transmission system. In addition, the Company is proposing certain ministerial changes described in the attached testimony of Mr. James Holodak Jr.

¹ Capitalized terms used, but not defined in this filing are intended to have the meanings given to such terms in Attachment H of the NYISO OATT including the April 2009 Settlement filed with the Commission on April 6, 2009.

The NYISO OATT specifically provides that the Revenue Requirement ("RR") component, the CCC component, and Annual Billing Units ("BU") components of a Transmission Owner's Wholesale TSC rate may be updated "based on Transmission Owner filings to FERC."² Under the terms of Attachment H to the NYISO OATT, Transmission Owners, including the Company, have rights to amend the components of their respective Wholesale TSC rates on their own initiative by making the requisite filing for Commission approval under Section 205 of the FPA.³

Since it is the NYISO that administers the NYISO OATT, and specifically Attachment H which contains National Grid's Wholesale TSC, National Grid has consulted with the NYISO to determine a mutually acceptable means for National Grid to exercise its FPA Section 205 rights with respect to this amendment of the Wholesale TSC. While not sponsoring National Grid's filing in this proceeding, the NYISO is submitting this filing on National Grid's behalf under the Commission's e-tariff regulations. Thus, the NYISO is facilitating the exercise of National Grid's FPA Section 205 rights with respect to this portion of the NYISO OATT.

II. Background

A. National Grid

National Grid, a New York corporation, is a combination gas and electric utility. National Grid is primarily engaged in the business of transmission and distribution of electricity, and the distribution and transportation of natural gas in New York State. National Grid serves over 1.6 million retail electric and 0.6 million retail gas customers in Buffalo, Syracuse, Albany, and other portions of upstate New York. National Grid owns approximately 6,000 miles of electric transmission lines and 8,800 miles of main and distribution gas pipelines. All of National Grid's bulk transmission facilities are subject to the operational control of the NYISO. Transmission service and generator interconnections associated with National Grid's facilities are provided to customers on a non-discriminatory basis pursuant to the NYISO OATT. Approximately 30 municipal electric utilities in upstate New York currently take service under National Grid's Wholesale TSC. In addition, approximately 80 customers external to the NYISO take service under the Company's Wholesale TSC.

B. The Wholesale TSC

On January 27, 1999, the Commission conditionally accepted the proposal made by National Grid and the other New York Transmission Owners ("NYTOs") to establish the NYISO in Docket ER97-1523-000. In conjunction with that filing, on November 17, 1999, the NYTOs filed a joint settlement agreement among all parties except Sithe/Independence Power Partners, L.P. ("Sithe") resolving all issues set for hearing in Docket No. ER97-1523-000 ("the NYISO Settlement"). The NYISO Settlement established as part of Attachment H to the NYISO OATT a settlement Revenue Requirement and Transmission Service Charge for wholesale transmission services provided using National Grid's facilities that was made applicable to all parties except those who were excepted.⁴

² See NYISO OATT, Attachment H, Section 14.1.2.1.2.

³ *Id.* With respect to National Grid specifically, see also Section 14.1.9.4.3.6.

⁴ Non-settling parties were made subject to a separate "filed" Revenue Requirement and Transmission Service Charge ("Filed TSC"). The NYISO Settlement also required National Grid

On February 11, 2008, as supplemented on May 30, 2008, National Grid submitted a filing under Section 205 of the Federal Power Act to replace its stated rates for its Transmission Service Charge in Attachment H to the NYISO OATT with formula rates to become effective May 1, 2008. On July 29, 2008, the Commission accepted and suspended the proposed formula rates, to become effective October 1, 2008, subject to refund, and establish hearing and settlement judge procedures.⁵ On April 6, 2009, National Grid on behalf of the Settling Parties⁶ filed a Settlement (“April 2009 Settlement”) intended to resolve all issues set for hearing in that proceeding. Among other things, the Settlement set forth the terms of a formula rate for the calculation of National Grid’s transmission service charge under the NYISO OATT (the “Settlement TSC Formula Rate”), as well as procedures for the annual adjustment of certain inputs to the formula rate. In a letter order issued June 22, 2009, the Commission approved the Settlement.⁷

On November 30, 2009, National Grid filed to modify the manner of calculating the long-term debt cost of capital rate. The filing sought to adjust the determination of the amount of long-term debt used in the calculation which was based on the average beginning of the year and year end long-term debt balances. On January 13, 2010 the filing was accepted by the Commission effective February 1, 2010.⁸

On March 30, 2012, National Grid submitted a filing to the Commission seeking to revise its depreciation rates in the RR component of the Wholesale TSC to be identical to those previously approved by the New York Public Service Commission (“NYPSC”) in the state jurisdictional Case 10-E-0050. In addition, Niagara Mohawk proposed to amend Section 14.2 of the NYISO OATT to reflect Niagara Mohawk’s agreement to exclude the costs of a temporary New York assessment from its revenue requirement and to make ministerial changes.

On May 29, 2012, the filing was accepted without modification by the Commission effective January 23, 2011.⁹

In accordance with the April 2009 Settlement, National Grid is directed to prepare an Annual Update each year calculating new values for the RR, CCC and BU components of the Settlement

to make a compliance filing revising its Filed TSC under the NYISO OATT based on the outcome of the hearing in Docket No. 0A96-194-000. The NYISO Settlement was approved by the Commission by letter order dated July 31, 2000. National Grid subsequently filed to revised its Filed TSC rate based on the final outcome of Docket No. 0A96-194-000.

⁵ *Niagara Mohawk Power Corp.*, Order Accepting and Suspending Formula Rate Subject to Refund and Establishing Hearing and Settlement Judge Procedures, 124 FERC ¶ 61,106 (2008)(“July 29 Order”). Certain Settling Parties requested rehearing of aspects of the July 29 Order. On February 25, 2009, the Commission issued an Order that denied rehearing in part and granted rehearing in part. 126 FERC ¶ 61,173 (2009).

⁶ The signatories consist of National Grid and the following entities: Allegheny Electric Cooperative, Inc., the City of Cleveland, Ohio, Multiple Intervenors, Municipal Electric Utilities Association, New York Association of Public Power, New York Municipal Power Agency, New York State Electric & Gas Corporation, and Rochester Gas & Electric Corporation (“Settling Parties”).

⁷ See *Niagara Mohawk Power Corp.*, 127 FERC ¶ 61,289 (2009).

⁸ See *Niagara Mohawk Power Corp.*, Letter Order, Docket Nos. ER10-328-000, ER10-328-001 (January 13, 2010).

⁹ See *Niagara Mohawk Power Corporation*, Letter Order, Docket Nos. ER12-1394-000 (May 29, 2012).

TSC Formula Rate based on updated Data Inputs. According to Section 14.1.9.4 in Attachment H to the NYISO OATT, National Grid is directed on or before June 14th of each year to (1) post the Annual Update on the NYISO's Internet website, (2) submit the Annual Update to the Commission as an informational filing requiring no action by the Commission, and (3) serve the Annual Update electronically on all Interested Parties.

III. Description of Filing

The primary purpose of the filing is to incorporate RSS expenses into the CCC component of the Company's Wholesale TSC formula rate set forth in Attachment H to the NYISO OATT. RSS expenses consist of temporary payments made by the Company to generators or other similar resources for the specific purpose of maintaining reliability on the Company's transmission system. NMPC began incurring such charges during calendar year 2012 under the first of two agreements with NRG Energy, Inc. pursuant to which, NRG will defer mothballing and continue to operate certain generating units at its Dunkirk generating station in upstate New York pending the completion of upgrades to the Company's transmission system.¹⁰

In order to effectuate this change, National Grid proposes to add a new item to the CCC component of the TSC formula rate, as set forth in Attachment H. Specifically, National Grid will add a "Reliability Support Services Expense" that will be defined in Attachment H as "expenses incurred pursuant to agreements entered into with generators or other similar resources for the purpose of supporting transmission reliability." As explained in the attached testimony of Mr. James Holodak Jr., among the various FERC Accounts, the Commission's explanation of costs to be included in FERC Account 561.1 best matches the description of RSS-type costs.¹¹

The inclusion of these costs in the CCC component of the Company's Wholesale TSC rate is appropriate because these costs directly relate to the functioning of National Grid's transmission system in upstate New York. As Mr. Holodak explains in his testimony, RSS agreements, such as those between National Grid and NRG, are entered into for the purpose of maintaining reliability on National Grid's New York transmission system. Procuring RSS services allows the Company to continue to reliably operate the transmission system pending, or in lieu of, implementing upgrades to the transmission system. As such, there is no reason to treat these costs any

¹⁰ As explained in Mr. Holodak's attached testimony, NRG had planned to take offline and place into mothball the four generating units at the Dunkirk station as of September 10, 2012. Upon receiving notice of NRG's intent to do so, National Grid conducted an analysis that determined that mothballing all of these units would compromise the reliability of its transmission system. The first agreement provides for reliability service from two of the Dunkirk units through May 31, 2012, which is the date on which National Grid anticipates completing a portion of the transmission upgrades necessary to resolve the reliability issue. The second agreement provides for reliability service from one Dunkirk unit from June 1, 2012 through May 31, 2015, which is the date that National Grid expects to complete all of the necessary transmission upgrades. Exh. NMP-3 at 6-8.

¹¹ Exh. NMP-3 at 9-12. There is already a line item for Account 561.1 under the CCC component of the National Grid's TSC formula rate. However, as Mr. Holodak explains, RSS expenses will be assigned to Account 561.1 in addition to those, if any, already included in the CCC component. The Company is proposing to add language to the description of the CCC component in Attachment H to make clear that expenses accounted for in Account 561.1, to the extent that they are based on RSS costs, will be included in the CCC component.

differently than those directly incurred for reinforcements or other upgrades to the transmission system. This outcome is also in accordance with the Commission's treatment of similar costs incurred by other transmission owners.¹²

Assuming approval of this filing, the Company will incorporate RSS expenses into the TSC rate formula in time for NMPC's 2013 Annual Update filing, which will establish TSC rates effective after the date of that filing. NMPC's revenue requirement for calendar year 2012 will be used as the basis for determining its 2013 Annual Update.

In addition to these revisions, the Company is proposing certain ministerial changes to Attachment H of the NYISO OATT to clarify and correct the application and definitions describing the TSC formula rate. These changes are described in Mr. Holodak's testimony.¹³ None of these proposed ministerial changes has any revenue impact on the TSC rate.

IV. Contents of Filing

- Attachment A, Service List
- Exhibits NMP-1 through NMP-6, which include:
 - Exhibit NMP-1 - Clean versions of revised sheets to the tariff
 - Exhibit NMP-2 - Black-lined versions of revised sheets to the tariff
 - Exhibit NMP-3 - Direct Testimony of James Holodak
 - Exhibit NMP-4 - Cost of Service Statements AA through BM
 - Exhibit NMP-5 - NYPSC August 16, 2012 Order Deciding Reliability Issues and Addressing Cost Allocation and Recovery
 - Exhibit NMP-6 – Request for Approval of Reliability Support Services Agreement

V. Proposed Effective Date

National Grid respectfully requests the formula rate and associated tariff revisions be accepted for filing effective for transmission bills rendered for service on and after July 1, 2013. To the extent waiver is needed for this proposed effective date, National Grid hereby requests waiver. The Commission has actively encouraged transmission owners to adopt formula rates of the type implemented by National Grid herein. Consistent with its policy of encouraging formula rates, the Commission's practice has been to permit such formula rate filings to become effective after a suspension period of no more than one day.¹⁴

¹² See, e.g., *Pacific Gas and Electric Co.*, 100 FERC ¶ 61,160 (2002) at PP 15-16, 21 (finding that reliability services, including the costs of reliability agreements with generators, provide a system-wide benefit and "should be paid for by all users of the grid" including wholesale transmission customers).

¹³ Exh. NMP-3 at 12-14.

¹⁴ *Allegheny Power System Operating Companies*, 111 FERC ¶ 61,308 at P 51 (2005) (accepting a formula rate proposal for filing and suspending it to become effective one day after the FERC order "where the Commission has, in

VI. Communications

National Grid requests that all correspondence, pleadings and other communications concerning this filing be served upon the following persons to be designated for service:

Terry L. Schwennesen
Attorney for National Grid
c/o National Grid
40 Sylvan Road
Waltham, Massachusetts 02451
(401) 480-9051

Terry.Schwennesen@nationalgrid.com

James G. Holodak, Jr.
c/o National Grid
14th Floor
One MetroTech Center
Brooklyn, New York 11201
(718) 403-2338

James.HolodakJR@nationalgrid.com

VII. Service

Pursuant to Section 32.5(d) of the Commission's Regulations, a copy of this filing is being served electronically on National Grid's customers under the rate affected by this filing, the New York State Public Service Commission, the NYISO, and other interested parties to the April 2009 Settlement . The service list for this filing may be found in Attachment A to this filing letter.

VIII. Request for Waiver

National Grid respectfully requests waiver of any requirements of the Commission's rules and regulations, as well as any authorization as may be necessary or required, to permit the revised rates to be accepted by the Commission and made effective in the manner proposed herein.

IX. Miscellaneous

No agreement is required by contract for the making of this rate filing. There are no costs included in this filing that have been alleged or adjudged in an administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs, nor has any expense or cost been demonstrated to be the product of discriminatory or employment practices, within the meaning of Section 35.13(d)(3).

X. Conclusion

For the foregoing reasons, National Grid respectfully requests that the Commission accept these proposed tariff changes without suspension, condition or modification.

Respectfully submitted,

/s/ Terry L. Schwennesen

Terry L. Schwennesen, Esq.
c/o National Grid
40 Sylvan Road
Waltham, MA 02451
(401) 480-9051
Fax: (781) 907-1659
Terry.Schwennesen@nationalgrid.com

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

Attachments

Attachment A

E-Mail List of Interested Parties upon Which this Filing was Served

E-Mail List of Interested Parties upon Which this Filing was Served

Village of Akron	sydshep@akronvillage.us
Village of Andover	andoverclerk@frontiernet.net
Village of Andover	voashop@frontiernet.net
Village of Arcade	larrykilburn@villageofarcade.org
Village of Bergen	bergenelectric@yahoo.com
Municipal Commission of Boonville	kstabb@prodigy.net
Village of Brocton	brocton@stny.rr.com
Village of Churchville	meghan@churchville.net
Village of Churchville	paul@churchville.net
Village of Frankfort	rvivacquavof@yahoo.com
Village of Holley	holley.electric.water@gmail.com
Village of Ilion	GregDLight@aim.com
Village of Little Valley	dreynoldsvolv@atlanticcbbn.net
Village of Mayville	mayville5@fairpoint.net
Village of Mohawk	mohawkmuni@hotmail.com
Village of Philadelphia	vphil@centralny.twcbc.com
City of Salamanca	kking@salmun.com
Village of Skaneateles	bob.lotkowicz@gmail.com
Village of Solvay	jmontone2@aol.com
Village of Springville	klux@villageofspringvilleny.com
Village of Theresa	theresa@ridgeviewtel.us
Village of Wellsville	billwhitfield@wellsvilleny.com
Village of Wellsville	pamelareed@adelphia.net
Village of Westfield	bboneberg@villageofwestfield
Village of Fairport	mcw@fairportny.com
New York Municipal Power Agency/MEUA	tmodafferi@nympa.org
Lake Placid	clerk@lpvillage.org
Lake Placid	electric1@lpvillage.org
Oneida Madison	sherwood@oneida-madison.coop
Tupper Lake	villtuplake@centralny.twcbc.com
Tupper Lake	johnbouck@centralny.twcbc.com
Jamestown	dleathers@jamestownbpu.com
Jamestown	dgustafson@jamestownbpu.com
Green Island	kristin@greenislandpowerauthority.com
Richmondville	rvillerpl@nycap.rr.com
Sherrill Power & Light	sherrillpower@twcny.rr.com

Former External TSC Customers

Allegheny Electric Cooperative	Gary_Wright@ccsenergy.com
Allegheny Electric Cooperative	Bruce_Erickson@ccsenergy.com
Amerada Hess	hjain@hess.com
American Electric Power	sepotters@aep.com
Dominion Energy Marketing	Robert_J_LaRochelle@dom.com
Dominion Energy Marketing	Shirley_Flexon@Dom.com
Duke Energy	seison@duke-energy.com

Conectiv Energy Supply
Coral Power LLC
Dayton Power and Light
El Paso Merchant Energy
Emera Energy Service
Energy Endeavors LLC
Epcor
FPL Energy Marketing
Gotham Energy marketing
KeyTex Energy LLC
Merchant Energy Group of the Americas
Mirant Energy Trading
Model City Energy
AES New Energy
NYSE&G Solutions
Public Service of Colorado
Pure Energy
PSEG Energy Resources and Trading
PSEG Energy Resources and Trading
RBC Energy Services
Seneca Energy II
Shell Energy North America (US) L.P.
Split Rock Energy, LLC
Southern Company Energy
TransCanada Power Marketing LTD
TXU Energy Trading

paul.wassil@conectiv.com
wilma.chin@shell.com
brenda.haupt@dplinc.com
David.Lazos@ElPaso.com
Karen.Hutt@Emera.com
pjones@energyendeavorsllc.com
settle@capitalpower.com
lauren_romero@fpl.com
pjones@gothamenergymarketinglp.com
clanager@keytexenergy.com
sterling_koch@transalta.com
vicki.lynch@mirant.com
pzeliff@ieslfge.com
Tamlynn.Apfelbaum@AES.com
mbeaudoin@theenergynetwork.com
rodney.d.sgrignoli@xcelenergy.com
delpowell@cox.net
howard.fromer@pseg.com
emily.pestano@pseg.com
iris.chow@rbccm.com
pzeliff@ieslfge.com
John.B.Coleman@shell.com
jsolberg@acespower.com
vicki.lynch@mirant.com
elaine_beaudry@transcanada.com
dbogus1@txu.com

Current External TSC Customers

Barclays Bank PLC
Black Oak Capital LLC
Black Oak Energy LLC
BP Energy Company
BP Energy Company
Brookfield Energy Marketing, Inc.
Brookfield Energy Marketing, Inc.
Bruce Power Inc.
Calpine Energy Service
Calpine Energy Service
Cargill Alliant, LLC
Centre Lane Trading
BNP Paribas Energy Trading GP formerly Fortis Energy Marketing
Citigroup Energy
Citigroup Energy
City Power Market LLC
City Power Market LLC
Constellation Energy Commodities Group
Constellation NewEnergy
Shell Energy North America (formerly Coral Power LLC)
Direct Energy Marketing

Nicholas.Andrews@barclayscapital.com
ckopp@blackoakcap.com
spicard@blackoakenergy.com
randy.prescott@bp.com
richard.waswil@bp.com
franklin.francis@brookfieldpower.com
chantal.dube@brookfieldpower.com
ayman.faddah@brucepower.com
garcia@calpine.com
Bryan.Stevens@calpine.com
lester_welch1@cargill.com
TLui@mackieresearch.com

lloyd.jackson@us.fortis.com
Kolby.P.Kettler@citigroup.com
laurel.r.adams@citigroup.com
ktsingas@citypwr.com
jwebster@citypwr.com
brian.schuppert@constellation.com
brian.schuppert@constellation.com
John.B.Coleman@shell.com
Linda.Gatto@DirectEnergy.com

Dominion Energy Marketing
 DC Energy LLC
 DTE Energy Trading
 DTE Energy Trading
 Dynegy Power Marketing
 EDF Trading North America, LLC
 Endura Energy LLC
 Exelon Generation LLC (formerly PECO)
 First Commodities
 Capital Power Corporation
 Hess Corporation
 HQ Energy Services (US)
 Iberdrola Renewables
 Integrys (formerly WPS) Energy Services
 J. Aron and Company
 J.P. Morgan
 Louis Dreyfus
 MAG Energy Solutions
 Macquarie Energy LLC
 Merrill Lynch
 Model City Energy
 Morgan Stanley
 NextEra Energy Power Marketing LLC
 Noble Americas Gas & Power
 Northern States Power
 NorthPoint Energy
 NRG Power Marketing
 NYPA
 NYSEG (LSE)
 NYSEG (LSE)
 Ontario Power Generation
 Powerex Corporation
 PP&L Energy Plus Co
 PSEG Energy Resources & Trading, LLC
 Iberdrola Renewables, Inc.
 Rainbow Energy
 Rochester Gas and Electric
 Saracen Merchant Energy LP
 Sempra Energy Trading LLC
 SESCO Enterprises LLC
 SIG Energy LLP
 Strategic Energy, Ltd.
 TransAlta Energy Mar

 TransCanada Power Marketing
 Twin Cities Power Generation
 Vitol Inc.
 West Oaks Energy NY NE LP
 XO Energy NY

Shirley_Flexon@Dom.com
wilde@dc-energy.com
hissongm@dteenergy.com
pfankucha@dteenergy.com
tiffany.e.mccaa@dynegy.com
amie.jackson@edftrading.com
m.white@endureenergy.com
dirk.vanderlaan@exeloncorp.com
jjtaza@firstcommodities.com
lgatto@capitalpower.com
ElectricSettlements@hess.com
bedard.lise@hydro.qc.ca
debbie.skinner@iberdrolaren.com
DJVerbanac@integrysenergy.com
allison.weingarten@gs.com
John.K.Swint@jpmorgan.com
Maria.Arnoldy@LDHEnergy.com
mgauthier@magenergysolutions.com
hope.hernandez@macquarie.com
christen_moody@ml.com
shenningham@innovativeenergysystems.com
gosppecops@morganstanley.com
bonny_arena@fpl.com
Daniellefazio@thisisnoble.com
rodney.d.sgrignoli@xcelenergy.com
settlements@northpointenergy.com
michael.evans@nrgenergy.com
william.palazzo@nypa.gov
nyseget@nyseg.com
caroe@nyseg.com
richard.gell@opg.com
tom.bechard@powerex.com
tatlas@pplweb.com
Cindy.Midura@pseg.com
debbie.skinner@iberdrolaren.com
k.morrison@rainbowenergy.com
caroe@nyseg.com
lphillips@saracenenergy.com
Marvina.Robinson@rbssempra.com
mschubiger@sescollc.com
Jamie.Miano@sig.com
kkukic@sel.com
eric_macdonald@transalta.com

michelle_day@transcanada.com
scurtis@tcpowergen.com
Lmm@vitol.com
ms@westoaksenergy.com
jcharette@xo-energy.com

From original service list (without duplicates)

Tom Rudebusch
Couch White, LLP
Couch White, LLP
Sonnenschein
Sonnenschein
Sonnenschein
NYMPA
Cleveland Public Power
Cleveland OH
Central Missouri Electric Cooperative, Inc
Thompson Coburn LLP
CCS Energy
State of Vermont
DPS NY State
DPS NY State
NYISO
Hunton & Williams LLP
Van Ness Feldman Law Firm
Public Utilities Dept, RI
Duncan & Allen, Counselors at Law
Massachusetts Municipal Wholesale Electric Company
Tellurian
Con Edison
Con Edison
NYPA
Thompson Coburn LLP
Saint Regis Mohawk Tribe

Stinson Morrison Hecker LLP
Central Maine Power Co

Rochester Gas & Electric
Central Hudson
FERC
Municipal Electric Utilities Association of New York State
FERC
Couch White, LLP
Van Ness Feldman Law Firm
Van Ness Feldman Law Firm
Duncan, Weinberg, Genzer & Pembroke, P.C
Winston & Strawn LLP
Winston & Strawn LLP
Duncan, Weinberg, Genzer & Pembroke, P.C
NYSEG
NYPA
NYISO
Black & Veatch
Geneva Looker
Dorothy Pierce

wrussell@wrassoc.com
tlr@dwgp.com
rloughney@couchwhite.com
mmager@couchwhite.com
ehand@sonnenschein.com
cvince@sonnenschein.com
WBOOTH@SONNENSCHIN.com
info@nympa.org
tsmith@cpp.org
hmadorsky@city.cleveland.oh.us
gstern@cmeec.org
dstraus@thompsoncoburn.com
david_dulick@ccsenergy.com
hans.mertens@state.vt.us
william_heinrich@dps.ny.gov
david_drexler@dps.ny.gov
rfernandez@nyiso.com
tmurphy@hunton.com
jbn@vnf.com
mkirkwood@pud-ri.org
jpc@duncanallen.com
bmckinnon@mmwec.org
ppanj@tellurian.com
nachmiass@coned.com
smithce@coned.com
gary.levenson@nypa.gov
gnewell@thompsoncoburn.com
dale.white@srmt-nsn.gov
duhie@attglobal.net
hreiter@stinson.com
scott.mahoney@cmpco.com
catherine.mccarthy@dl.com
marjorie_perlman@rge.com
jwatzka@cenhud.com
Roger.St.Vincent@ferc.gov
tmodafferi@meua.org
james.pepper@ferc.gov
jgoodman@couchwhite.com
msc@vnf.com
dpy@vnf.com
rw@dwgp.com
ddankner@winston.com
rwuslich@winston.com
jea@dwgp.com
RPKinney@nyseg.com
micheal.lupo@nypa.gov
mlampi@nyiso.com
robertsjl@bv.com
glooker@wrassoc.com
dorothy.pierce@chguernsey.com

CERTIFICATE OF SERVICE

I hereby certify that I have served by electronic mail the foregoing document upon all parties on the email service list of Interested Parties provided in Attachment A pursuant to the requirements of the Settlement in the above-captioned proceedings.

Dated at Waltham, MA, this 29th day of March, 2013.

/s/ Terry Schwennesen
c/o National Grid
40 Sylvan Road
Waltham, MA 02451
(401) 480-9051