



July 1, 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. ER13-1182-000`**

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 an amendment to its March 29, 2013 filing in this proceeding, in accordance with directions provided by FERC staff in a deficiency letter issued on June 26, 2013 ("June 26 Letter"). On March 29, 2013, the Company proposed revisions to the FERC Open Access Transmission Tariff ("OATT") administered by the New York Independent System Operator, Inc. ("NYISO") to amend National Grid specific components of the Wholesale Transmission Service Charge ("Wholesale TSC") formula rate under the NYISO OATT ("March 29 Filing"). Specifically, National Grid proposed changes to its Scheduling, System Control and Dispatch Costs ("CCC") formula rate under the Wholesale TSC to incorporate costs incurred by the Company for Reliability Support Services ("RSS"). In the June 26 Letter, National Grid was directed to answer four questions and to amend its filing within 15 days.<sup>1</sup> The Company's responses to these questions are attached. National Grid requests that the changes proposed in the March 29 Filing 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. Description of Filing**

The primary purpose of the March 29 Filing is to incorporate RSS expenses into the CCC component of the Company's Wholesale TSC formula rate which is 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

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<sup>1</sup> June 26 Letter at 3.

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.

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" component to its formula rate 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 testimony of Mr. James Holodak Jr. included with the March 29 Filing, 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.<sup>2</sup>

As explained in the March 29 Filing, the Company plans to incorporate RSS expenses into the Wholesale TSC rate formula for the first time as part of National Grid's 2013 Annual Update filing which will establish TSC rates for service rendered July 1, 2013 through June 30, 2014. The Company's revenue requirement for calendar year 2012 will be used as the basis for determining its 2013 Annual Update, and the Company's actual RSS expenses incurred during 2012 under its agreement with NRG would be the first RSS expenses to be included in the Company's Wholesale TSC formula rate.

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 also described in Mr. Holodak's testimony.<sup>3</sup> None of these proposed ministerial changes has any revenue impact on the TSC rate.

As with the March 29 Filing, 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. Contents of Filing**

This filing consists of the following documents:

- Filing Letter

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<sup>2</sup> March 29 Filing, 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.

<sup>3</sup> March 29 Filing, Exh. NMP-3 at 12-14.

- Attachment A, Service List
- Attachment B, Responses to FERC Staff's Information Requests

### **III. Proposed Effective Date; Request for Waiver**

National Grid requests an effective date of July 1, 2013 for the revisions to the Wholesale TSC formula rate, which is the effective date proposed in the March 29 Filing, and, to the extent necessary, requests waiver of the notice period required specified in 18 C.F.R. § 35.3(a). The July 1, 2013 effective date remains appropriate and good cause supports National Grid's request for waiver because, while National Grid is pleased to provide the additional information requested in the June 26 Letter to help Staff evaluate the Company's filing, that information is not required as part of the March 29 Filing under Part 35 of the Commission's regulations.

The information requested in the June 26 Letter concerns costs that National Grid may incur under RSS agreements after July 1, 2013. However, as explained above and in the March 29 Filing, the March 29 Filing did not propose the recovery of specific RSS costs, but rather a change in the Wholesale TSC formula rate to permit recovery of those costs when and if National Grid incurs them. That formula rate adjusts Wholesale TSC charges effective on July 1 of each year based primarily on the costs National Grid incurs during the previous calendar year (see March 29 Filing, transmittal at 5; NYISO OATT, Attachment H, § 14.1.9.4.1.3.1). Thus, the initial charges under the amended Wholesale TSC formula rate will, commencing with July 1, 2013, recover RSS costs that National Grid incurred during 2012. National Grid's statement of the impact of the proposed rate change during the first year after it takes effect, required by 18 C.F.R. § 35.13(c), accordingly was based on the 2012 RSS costs. (see March 29 Filing, transmittal at 4-5; Holodak Testimony at 12; Exh. NMP-4). For these reasons, while National Grid is providing the requested information regarding RSS costs it expects to incur in 2013 and later years to assist Staff's evaluation of the March 29 Filing, that information was not required by the Commission's regulations. The omission of that information from the March 29 Filing presents no valid basis for deferring the effective date of the revisions to the Wholesale TCS rate beyond July 1, 2013. Rather, deferring the effective date of those revisions would unfairly deprive National Grid of the opportunity to recover legitimate costs of providing transmission service.

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.

### **IV. 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:

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## **V. 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, parties either requesting or granted intervention in this proceeding 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.

## **VI. 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.

## **VII. Conclusion**

For the foregoing reasons, National Grid respectfully requests that the Commission accept these proposed tariff changes without suspension, condition or modification, effective July 1, 2013.

Respectfully submitted,

/s/ Terry L. Schwennesen

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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**

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Village of Bergen	<a href="mailto:bergenelectric@yahoo.com">bergenelectric@yahoo.com</a>
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Duke Energy	<a href="mailto:seison@duke-energy.com">seison@duke-energy.com</a>

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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

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#### **Current External TSC Customers**

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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)

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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  
Integrus (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  
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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  
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**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 1st day of July, 2013.

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

**Attachment B**

**Responses to FERC Staff's Information Requests**

Responses to FERC Staff's Information Requests – Request 1

**Request:**

National Grid requests that the formula rate and OATT revisions be accepted for filing effective for transmission bills rendered for service on and after July 1, 2013. However, Exhibit No. NMP-4, Statement BG – BL describe rate changes from test year 2011 compared to expected 2012 rates. What, if any, RSS expenses incurred prior to July 1, 2013 will be billed for transmission service that occurs on or after July 1, 2013?

**Response:**

The Wholesale TSC formula rate charges during each rate year (July 1 through June 30) are based primarily on costs incurred during the previous calendar year. See NYISO OATT, Attachment H, § 14.1.9.4.1.3.1. This is how the proposed revisions to the formula rate would recover RSS costs. Accordingly, the RSS expenses reflected in Exhibit No. NMP-4, Statement BG –BL, were all incurred in 2012; from the period September, 2012 through December, 2012. Those expenses are to be recovered in charges under the Wholesale TSC formula rate for service rendered July 1, 2013 through June 30, 2014. RSS expenses incurred from the period January, 2013 through December 31, 2013 would be recovered in charges billed for services rendered under the Wholesale TSC formula rate from July 1, 2014 through June 30, 2015.

Responses to FERC Staff's Information Requests – Request 2

**Request:**

National Grid states that a second agreement provides for reliability service from one Dunkirk unit from June 1, 2013 through May 31, 2015. Please explain whether all transmission service billing for RSS under these revisions to the NYISO OATT Attachment H end on or before May 31, 2015?

**Response:**

Payments under the second agreement for reliability services, similar to the first agreement, comprise monthly fixed price charges, property tax and take or pay adjustments, and revenue credits. The company is estimating two small property tax adjustments in the beginning of 2016. RSS expenses incurred in the period January through December, 2015 would be billed through transmission billings from the period July 1, 2016 through June 30, 2017. Costs incurred from the period January 1, 2016 through December 31, 2016 would be billed through transmission billings for service from the period July 1, 2017 through June 30, 2018.

Prepared by or under the supervision of: James Holodak

Responses to FERC Staff's Information Requests – Request 3

**Request:**

The Holodak Testimony describes the expected total increase in the Wholesale Transmission Service Charge rate as \$1,510,443 for 2012. What transmission service billing will occur as a result of the first agreement with Dunkirk ending May 31, 2013 and what transmission service billing is expected to occur as a result of the second agreement that runs through May 31, 2015?

**Response:**

As explained in response to Request No. 1, the Wholesale TSC charges during the Period July 1, 2013 through June 30, 2014 are entirely associated with costs under the first agreement. In the transmission billings from the period July 1, 2014 through June 30, 2015, the Company estimates that \$1,330,705 would be billed as a result of the first agreement with Dunkirk ending May 31, 2013. For the second agreement the company estimates billing \$1,451,200 for the period July 1, 2014 through June 30, 2015. Estimated billings under the second agreement for the periods after June 30, 2015 are shown in the response to Request 4.

Prepared by or under the supervision of: James Holodak

Responses to FERC Staff's Information Requests – Request 4

**Request:**

National Grid provides several calculations and expectations as Exhibits No. NMP-1 – 4 to its filing. However, none of these exhibits describe the expected RSS costs in years 2013, 2014 and 2015 when the second agreement ends. Please provide an update in this record of the total expected increases in transmission service billing by describing expected changes in both the Niagara Mohawk Power Corporation Annual Revenue Requirement and Wholesale Transmission Service Charge.

**Response:**

Below please find a schedule of estimated RSS costs payable under the Dunkirk agreements and the years the costs would be recovered. Note that under the Company's proposal, additional RSS costs could be incurred under other agreements, but no other agreements are anticipated at this time.

	Estimated Costs to be included in Scheduling System Control and Dispatch Costs (CCC)	Total Annual Billing Units (BU) MWh	Rate \$/MWh	Wholesale TSC Rate Billing Units	Amount Forecasted to be Billed in TSC Rates
Calendar Year 2012 Payments to NRG, Billed Transmission rates July 1 2013 - June 30 2014	17,691,625	37,212,621	0.47542	3,177,070	1,510,443
January through May Payments to NRG, Billed Transmission rates July 1 2014 - June 30, 2015	15,586,383	37,212,621	0.41885	3,177,070	1,330,705
June through December Payments to NRG, Billed Transmission rates July 1 2014 - June 30, 2015	16,997,723	37,212,621	0.45677	3,177,070	1,451,200
Total 2013 Payments Billed, Transmission rates July 1, 2014 - June 30, 2015	32,584,106	37,212,621	0.87562	3,177,070	2,781,905
Total 2014 Payments to be Billed through Wholesale rates July 1, 2015 - June 30, 2016	34,844,083	37,212,621	0.93635	3,177,070	2,974,854
Total 2015 Payments to be Billed through Wholesale rates July 1, 2016 - June 30, 2017	17,697,583	37,212,621	0.47558	3,177,070	1,510,951
Total 2016 Payments to be Billed through Wholesale rates July 1, 2017 - June 30, 2018	1,240,041	37,212,621	0.03332	3,177,070	105,870

Prepared by or under the supervision of: James Holodak