

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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Application of Niagara Mohawk Power :
Corporation d/b/a National Grid for a :
Certificate of Environmental Compatibility :
and Public Need Pursuant to Article VII for : Case 22-T-_____
its Lockport-Batavia Line 112 Rebuild :
Project in Niagara and Genesee Counties :
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**MOTION OF NIAGARA MOHAWK POWER CORPORATION
D/B/A NATIONAL GRID FOR WAIVERS OF
APPLICATION REQUIREMENTS**

Pursuant to 16 NYCRR §§ 3.3 and 3.6, and as part of its filing of an application (“Application”) for a Certificate of Environmental Compatibility and Public Need for its Lockport-Batavia Line 112 Rebuild Project (“Project”) in Niagara and Genesee Counties, Niagara Mohawk Power Corporation d/b/a National Grid (“Applicant”) respectfully requests that the Commission waive or modify for this Application the following sections of the Commission’s regulations governing the information to be included in an application filed pursuant to Article VII of the Public Service Law.

- 1. 16 NYCRR § 86.3(a)(2): Submit New York State Department of Transportation (“NYSDOT”) maps (scale 1:250,000) showing the relationship of the proposed facility to the Applicant’s overall system with respect to specified information.**

The Applicant requests that the Commission waive the requirement in 16 NYCRR §86.3(a)(2) that information specified in the regulation be shown on NYSDOT maps at a scale of 1:250,000. NYSDOT has advised the Applicant that such maps of the Project area are not available. The Applicant has instead used 1:250,000 scale United States Geological Survey topographic maps for this figure, which is Figure 2-4 in Exhibit 2 of the Application.

2. 16 NYCRR § 86.3(b)(2): Aerial photographs of urban areas and urbanizing fringe areas shall be taken within six months of the date of filing.

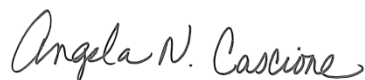
The Applicant requests a waiver of the requirement in 16 NYCRR §86.3(b)(2) that “Aerial photographs of urban areas and urbanizing fringe areas shall be taken within six months of the date of filing.” Figure 2-5 in Exhibit 2 of the Application is based on aerial photographs of the Project area that were taken by Cooper Aerial Survey Company on April 14, 2019. The Applicant has verified through field reconnaissance conducted in August, 2022 that the submitted aerial photographs reflect the current situation in the Project area.

3. 16 NYCRR § 88.4(a)(4): Provide system studies showing flows on the line under various conditions, including a copy of the system reliability impact study forwarded by the Transmission Planning Advisory Subcommittee.

The Applicant requests waiver of the requirement that Exhibit E-4 of the Application include system studies showing flows on the line under various conditions, including a system reliability impact study or system impact study (“SIS”). As stated in Exhibit E-4, the change in system power flows and ratings attributed to the Project will be minimal. Thinh Nguyen of the New York Independent System Operator (“NYISO”) confirmed in an e-mail dated January 5, 2021 that the Project does not meet NYISO’s threshold to trigger an SIS requirement and thus an SIS is not required. (A copy of the NYISO email is attached to Exhibit E-4 of the Application as Attachment E-4-1.)

Dated: November 18, 2022

Respectfully submitted,



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