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December 4, 2014

VIA ELECTRONIC FLING

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Midcontinent Independent System Operator, Inc.
FERC Docket No. ER15-____-000
Filing of Generator Interconnection Agreement
PUBLIC VERSION

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”), 16 U.S.C. § 824d, and Section 35.12 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations, 18 C.F.R. § 35.12 (2013), the Midcontinent Independent System Operator, Inc. (“MISO”) hereby respectfully submits a Generator Interconnection Agreement (“Interconnection Agreement”) among Duke Energy Indiana, Inc. , a corporation organized and existing under the laws of the State of Indiana (“Interconnection Customer”), and Duke Energy Business Services, LLC as agent for Duke Energy Indiana, Inc., organized and existing under the laws of the State of Delaware (“Transmission Owner”), and MISO (“Transmission Provider”). MISO has designated the Interconnection Agreement as Original Service Agreement No. 2718 under MISO’s FERC Electric Tariff, Fifth Revised Vol. No. 1 (“Tariff”). MISO has designated this project as Project No. J333/J334 in its interconnection queue. A non-public version of the Interconnection Agreement containing pages designated as Critical Energy Infrastructure Information (“CEII”) is being provided under separate cover as explained below.

I. OVERVIEW OF FILING

The body of the attached Interconnection Agreement conforms, with an exception, to the *pro forma* Generator Interconnection Agreement (“*pro forma* GIA”) and contains the revisions conditionally accepted by the Commission on December 19, 2013 in Docket No. ER12-309-005. Additionally, the body of the *pro forma* GIA contains pending language filed with the Commission in Docket Nos. ER12-309-006 and ER14-2562-001.

Accordingly, MISO asks that the Commission conditionally accept the Interconnection Agreement subject to any subsequent revisions to be accepted by the Commission in Docket Nos. ER12-309 and ER14-2562, *et al.*

The exception is found in Article 2, Section 2.2. The following change was made.

2.2 – **Term of Agreement.** Subject to the provisions of Article 2.3, this GIA shall remain in effect ~~for a period of _____ years~~ from the Effective Date ~~and shall be automatically renewed for each successive one year period thereafter on the anniversary of the Effective Date~~ until April 16, 2016.

This change recognizes the unique factual circumstance that the Interconnection Customer has submitted to MISO an Attachment Y Definitive Retirement Notice and the units have been approved for retirement effective April 16, 2016.

II. DOCUMENTS SUBMITTED IN THIS FILING

The documents being submitted with this filing include this transmittal letter and a public and non-public version of the Interconnection Agreement in accordance with the parties' designation of the diagrams contained in this filing as CEII under the Commission's rules, 18 C.F.R. §§ 388.112 & 388.113 (2011). Pursuant to the Commission's Notice Announcing New Combined Notice of Filings, issued on May 13, 2005, and the Commission's subsequent listing on its website, no form of notice is required under 18 C.F.R. § 35.8 (2011).¹ The Parties have designated diagrams of their interconnection in Exhibit A1-1 as CEII.

MISO hereby requests confidential treatment of the CEII contained in Exhibit A1-1 of the non-public version of the Interconnection Agreement enclosed pursuant to 18 C.F.R. § 388.12. The CEII has been marked according to the Commission's instructions.

The Parties assert that Exhibit A1-1 qualifies as CEII pursuant to 18 C.F.R. § 388.113(c)(1) for the following reasons: the diagrams attached to the Interconnection Agreement are system maps that provide specific detailed design information about existing critical transmission system infrastructure. The Exhibits are exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552. Members of the public can obtain access to the Exhibits by complying with the Commission's procedures per 18 C.F.R. § 388.113.

Accordingly, MISO requests confidential treatment of the public version of this filing as CEII pursuant to 18 C.F.R. § 388.12. MISO submits a non-public version of this agreement under separate cover.

¹ See Documents and Filings, Notice Formats, available at <http://www.ferc.gov/docs-filing/not-form.asp>.

The documents being submitted with this filing include this transmittal letter;

Tab A: Clean copy of the Interconnection Agreement;

Tab B: Redlined copy of the Interconnection Agreement reflecting changes as compared to the *Pro Forma*²; and

Tab C: CEII Protective Agreement.

III. PROPOSED EFFECTIVE DATE

MISO respectfully requests that the Commission waive its sixty (60) day notice requirement as required by Section 35.3(a) of the Commission's regulations, 18 C.F.R. § 35.3(a), and make this Interconnection Agreement effective as of December 5, 2014.³ The Parties have indicated their intention for and support of an effective date of December 5, 2014. MISO requests that the December 5, 2014 date be used to provide certainty to the Parties as to the status of the agreement. To the extent that the Commission determines that any requirements of 18 C.F.R. § 35 apply that have not been specifically addressed herein, the MISO respectfully requests waiver of such requirements.

IV. COMMUNICATIONS

Correspondence, pleadings and other materials regarding this filing should be addressed to the following persons:

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² MISO has highlighted for the Commission the language that is currently pending before the Commission in Docket No. ER12-309-006 and ER14-2562-001.

³ The Commission's policy permits waivers of the 60-day prior notice of filing requirement in the case of a non-rate change to the terms and conditions of a Commission-accepted Rate Schedule. See *Central Hudson Gas & Electric Corp.*, 60 FERC ¶ 61,106, *reh'g denied*, 61 FERC ¶ 61,189 (1992).

V. NOTICE AND SERVICE

MISO notes that it has served a copy of this filing electronically, including attachments, upon all Tariff Customers under the Tariff, MISO Members, Member representatives of Transmission Owners and Non-Transmission Owners, MISO Advisory Committee participants, as well as all state commissions within the Region. The filing has been posted electronically on MISO's website at <https://www.misoenergy.org/Library/FERCFilingsOrders/Pages/FERCFilings.aspx> for other interested parties in this matter. In addition, MISO has served a copy of this filing electronically on all parties to this agreement.

IV. CONCLUSION

For all of the foregoing reasons, MISO respectfully requests that the Commission accept for filing this Interconnection Agreement and grant the proposed effective date of December 5, 2014, and grant waiver of any Commission regulations not addressed herein that the Commission may deem applicable to this filing.

Respectfully submitted,

/s/ Jacob T. Krouse

Jacob T. Krouse
Attorney for the Midcontinent Independent
System Operator, Inc.

Attachment