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June 25, 2026

Via Electronic Filing

Michelle L. Phillips,
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza,
Agency Building 3
Albany, NY 12223-1350

Re: ORES Matter No. 23-02973: Application of NY North Country, LLC, for a Permit Pursuant to Article VIII of the New York State Public Service Law to Construct the North Country Wind Project, a Major Electric Generating Facility to be Located in the Towns of Bellmont, Burke, and Chateaugay, Franklin County, and the Town of Clinton, Clinton County, New York

Request for Permission to Submit an Amendment to an Application Pursuant to 16 NYCRR § 1100-7.1(b)

Dear Secretary Phillips and ORES Staff:

This office represents the Applicant, NY North Country, LLC, (“North Country” or “the Applicant”) with regard to the above proceeding. On February 13, 2026 North Country filed an Application for a Permit to Construct a Major Electric Generating Facility pursuant to Article VIII of the New York State Public Service Law, and Title 16 of NYCRR, Part 1100 (“Application”), seeking a permit from the Office of Renewable Energy Siting and Electric Transmission (“ORES”) to construct the North Country Wind Facility with up to 360-megawatts (“MW”) in generation capacity in the Towns of Bellmont, Burke, and Chateaugay, and Village of Chateaugay, Franklin County, and the Town of Clinton, Clinton County, New York (the “Facility”).

The Applicant hereby files this request for permission to submit an Amendment to the Application for the North Country Wind Facility pursuant to the requirements of 16 New NYCRR § 1100-7.1(b).

On April 14, 2026, ORES determined that the Application was incomplete and issued a letter identifying specific deficiencies to be addressed by the Applicant (NOIA). The Applicant

is diligently working on responses to the April 14th NOIA letter in order for ORES to deem the Application complete.

In addition to working on the response to the NOIA, the Applicant has made minor modifications to the layout of the Facility to optimize the design, reduce impacts to environmental resources, and to address comments received on the Application.

Pursuant to the requirements of 16 NYCRR § 1100-7.1(b)(1) and to further support this request, see the information below:

- (i) **The proposed change to the application:** The Applicant will update and supplement the Application to address the deficiencies identified in ORES' April 14, 2026, letter and to incorporate the proposed modifications to the Facility layout. The Amended Application will include updated engineering design drawings reflecting the updated design, collection line routing, access roads, laydown yards, intersection improvements, blade swing areas, and limits of disturbance. The Amended Application will also include revisions to the applicable environmental, agricultural, cultural, and technical exhibits necessary to evaluate the modified Facility components, including updates related to the additional turbine model, wetland impact avoidance measures, agricultural impact minimization, and responses to agency comments. Finally, the Amended Application will include the addition of an alternative turbine model with a greater generating capacity. However, the proposed turbine model has an overall height and rotor diameter that are equal to or smaller than the turbine models currently proposed, and the associated noise and shadow flicker impacts are anticipated to be equivalent to or less than those previously evaluated. **Attachment A** to this letter includes a summary of the proposed modifications and the corresponding exhibit revisions.
- (ii) **A justification as to why such changes are required:** Since submission of the Article VIII Application, the Applicant has refined the Facility layout to optimize the Project design, reduce potential environmental and agricultural impacts, respond to agency comments, and improve constructability and operational efficiency. The modifications are intended to address comments received on the Application, further avoid or minimize impacts to state-regulated wetlands, agricultural resources, and non-participating landowners, and provide additional flexibility in turbine selection and Facility design. Collectively, these changes improve the overall layout of the Facility while further minimizing impacts.
- (iii) **Assessment:** Under 16 NYCRR § 1100-1.2(ay), a “major amendment” is defined as “a change in an application or draft permit condition likely to result in any material increase in any identified adverse environmental impacts, any significant adverse environmental impact not previously identified, or any new site specific standards and conditions.”

The proposed modifications constitute a minor amendment because they do not meet the definition of a major amendment under 16 NYCRR Part 1100. The modifications primarily consist of refinements to the Facility layout intended to optimize the design, reduce environmental and agricultural impacts, respond to agency comments, and improve constructability and operational efficiency.

The proposed minor modifications will not result in any material increase in any identified adverse environmental impact or any significant adverse environmental impact not addressed by uniform or site-specific standards or conditions or otherwise involve a substantial change to the existing permit standards or conditions. To the contrary, several of the modifications further avoid or minimize impacts, including extending horizontal directional drilling to reduce impacts to state-regulated wetlands and adjacent areas, shifting an access road to reduce impacts to agricultural fields, relocating laydown yards in response to New York State Department of Transportation comments, and modifying intersection improvements and blade swing areas to avoid impacts to non-participating landowners.

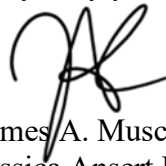
The addition of new turbine models and the increase in the Facility's nameplate capacity do not introduce new impact categories or result in significant adverse impacts not previously addressed through the uniform standards and conditions or the site-specific analyses required by the Application. The proposed modifications will be evaluated through updated exhibits and supporting analyses, as necessary, to confirm continued compliance with applicable standards and permit conditions.

Finally, the modifications do not involve a substantial change to the overall nature, purpose, or operation of the Facility. The Facility remains a utility-scale wind generating facility and the proposed changes represent limited design refinements that improve the Facility. Accordingly, the proposed modifications constitute a minor amendment.

- (iv) **An anticipated timeframe for resubmission:** The Applicant is proposing to file the response to the NOIA and Amended Application on or about July 17, 2026. With the filing of the Amended Application, the Applicant will provide additional local agency account funding to reflect the increase in the Facility's nameplate generating capacity and to ensure continued compliance with the applicable local agency account requirements.

Please feel free to contact our office if you have any questions regarding the above.

Very truly yours,



James A. Muscato II
Jessica Ansert Klami
Young/Sommer LLC
Attorneys for NY North Country, LLC

Attachment

cc: Party List for the proceeding (*via electronic filing and email*)