

ATTACHMENT I

MOTIONS OPPOSING THE ICAP DEMAND CURVE

To date, the following 17 motions and one Answer have been submitted in opposition to the ICAP Demand Curve:

1. *Motion of Agway Energy Services, Inc., ECONergy Energy Company, Inc., and Mirabito Gas & Electric, Inc., To Intervene As Parties And To Submit A Protest*, Docket No. ER03-647 (Apr. 9, 2003) [hereinafter *Agway Motion*];
2. *Motion to Intervene of The Electricity Consumers Resource Council*, Docket No. ER03-647 (Apr. 11, 2003) [hereinafter *Electric Consumers Resource Council Motion*];
3. *Motion of Retail Suppliers Alliance for Leave to Intervene, For Summary Rejection of “Price Floor” and Rate Increase Filing, and for Other Relief*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Retail Suppliers Motion*];
4. *Motion to Intervene and Protest of Strategic Energy, L.L.C.*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Strategic Energy Motion*];
5. *Motion to Intervene and Protest of Village of Bergen, Village of Freeport, Jamestown Board of Public Utilities, Village of Rockville Centre and Salamanca Board of Public Utilities (The “NY Municipals”)*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *NY Municipals Motion*];
6. *Motion to Intervene and Protest of the City of New York*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *City of New York Motion*];
7. *Motion to Intervene and Protest of Morgan Stanley Capital Group Inc.*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Morgan Stanley Motion*];
8. *Bank of Nova Scotia Comments*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Bank of Nova Scotia Motion*];
9. *Motion to Intervene and Comments of Paul D. Tonko*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Tonko Motion*];
10. *Motion to Intervene and Joint Protest of Delaware Municipal Electric Corporation, Inc., Allegheny Electric Cooperative, Inc., and Old Dominion Electric Cooperative, Inc.*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Delaware Municipal Electric Motion*];
11. *Motion to Intervene, Protest and Comment of Consolidated Edison Company of New York, Inc., and Orange & Rockland Utilities, Inc. (collectively “Con Edison”)*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Con Edison Motion*];
12. *Motion to Intervene and Protest of the Multi-ISO Consumer Groups*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Multi-ISO Consumer Motion*];
13. *Motion to Intervene and Protest of Select Energy, Inc. under ER03-647*, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter *Select Energy Motion*];
14. *Protest of Association for Energy Affordability, Inc., Amerada Hess Corporation, Agway Energy Services, Inc., Builders Realty Institute, The City of New York,*

Consolidated Edison Company of New York, Inc., Consumer Power Advocates, The Council of New York Co-ops and Condominiums, ECONergy Energy Company, Inc., Energetix, Inc., The Energy Cooperative, Mirabito Gas & Electric, Inc., Multiple Intervenors, Nepool Industrial Customer Coalition, New York Energy Buyers Forum, New York State Electric & Gas Corporation, The Energy East Companies, Orange and Rockland Utilities, Inc., PJM Industrial Customer Coalition, Rochester Gas and Electric Corporation, Select Energy, Inc., Strategic Energy L.L.C., and Strategic Power Management, Inc. (collectively, the "Multi-Sector Protestors"), Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter Multi-Sector Protestors Motion];

- 15. Motion for leave to file out of time an intervention, protest and for shortened answer period of New York State Electric & Gas Corp and Rochester Gas and Electric Corp (collectively, "The Energy East Companies") under ER03-647, Docket No. ER03-647-000 (Apr. 14, 2003) [hereinafter Energy East Companies Motion];*
- 16. Motion to Intervene Out of Time and Comments of PJM Interconnection, L.L.C., Docket No. ER03-647-000 (Apr. 16, 2003) [hereinafter PJM Motion];*
- 17. Comment on Filing of the Committee on Environmental Protection of the New York City Council under ER03-647, Docket No. ER03-647-000 (Apr. 23, 2003) [hereinafter Committee on Environmental Protection Motion];*
- 18. Joint Answer of Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation, Docket No. ER03-647-000 (Apr. 28, 2003) [hereinafter Con Edison Answer].*

The parties filing those motions in opposition are collectively referred to herein as the "Protestors."

MOTIONS IN SUPPORT OF THE ICAP DEMAND CURVE

Thirteen motions have been filed in support:

- 1. Motion to Intervene and Comments of New York Power Authority, Docket No. ER03-647-000 (Apr. 8, 2003) [hereinafter New York Power Authority Motion];*
- 2. Motion to Intervene and Supporting Comments of Independent Power Producers of New York, Inc., Docket No. ER03-647-000 (Apr. 10, 2003) [hereinafter Independent Power Producers of New York Motion];*
- 3. Joint Motion to Intervene and Comments of Mirant Americas Energy Marketing, L.P. and Mirant New York, Inc., Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter Mirant Motion];*
- 4. Motion to Intervene and Comments of AES Eastern Energy, L.P., Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter AES Eastern Energy Motion];*
- 5. Motion to Intervene and Supporting Comments of Sithe Energy Marketing, L.P., Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter Sithe Motion];*

6. *Intervention and Supporting Comments of PSEG Power LLC, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter PSEG Motion];*
7. *Motion to Intervene and Supporting Comments of The NRG Companies, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter NRG Companies Motion];*
8. *Motion to Intervene and Comments of Keyspan-Ravenswood, LLC, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter Keyspan Motion];*
9. *Motion to Intervene and Comment of Dynegy Power Marketing, Inc. and Dynegy Northeast Generation, Inc., Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter Dynegy Motion];*
10. *Motion to Intervene and Comments of Reliant Resources, Inc., Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter Reliant Motion];*
11. *Motion to Intervene of the Electric Power Supply Association in Support of Independent Power Producers of New York Filing, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter Electric Power Supply Motion];*
12. *Notice of Intervention and Comments in Support of the New York Public Service Commission, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter NYPSC Motion];*
13. *Motion to Intervene of The Long Island Power Authority and LIPA, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter LIPA Motion].*

GENERAL MOTIONS TO INTERVENE

Seven general interventions have been filed:

1. *Motion to Intervene of Central Hudson Gas & Electric Corporation, Docket No. ER03-647-000 (Apr. 4, 2003) [hereinafter Central Hudson Motion];*
2. *Motion to Intervene of Strategic Power Management, Inc., Docket No. ER03-647-000 (Apr. 7, 2003) [hereinafter Strategic Power Motion];*
3. *Motion to Intervene of Calpine Eastern Corporation, Docket No. ER03-647-000 (Apr. 10, 2003) [hereinafter Calpine Eastern Motion];*
4. *Motion to Intervene of Coral Power, L.L.C., Docket No. ER03-647-000 (Apr. 10, 2003) [hereinafter Coral Power Motion];*
5. *Motion of Amerada Hess Corporation for Leave to Intervene, Docket No. ER03-647-000 (Apr. 10, 2003) [hereinafter Amerada Hess Motion];*
6. *Motion to Intervene of the New York State Reliability Council, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter New York Reliability Council Motion];*
7. *Motion to Intervene of Niagara Mohawk Power Corporation, Docket No. ER03-647-000 (Apr. 11, 2003) [hereinafter Niagara Mohawk Motion].*