

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.

)

Docket No. RT01-2-000

MOTION TO INTERVENE OF
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.

Pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure,¹ and the Commission's Notice of Filing of September 14, 2001, the New York Independent System Operator, Inc. (NYISO) hereby moves to intervene in the above-captioned proceeding.

I. Copies of Correspondence

Communications regarding this proceeding should be addressed to:

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II. Motion To Intervene

The NYISO is the independent body responsible for providing open-access transmission service, maintaining reliability, and administering competitive wholesale electricity markets in New York State. This proceeding involves the PJM Interconnection, L.L.C.'s (PJM's) compliance filing in response to the Commission's order of July 12, 2001 in *PJM*

¹ 18 C.F.R. § 385.212 and .214 (2001).

Interconnection, L.L.C., 96 FERC ¶ 61, 061. On September 10, 2001, PJM filed revisions to the PJM Open Access Transmission Tariff, to the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. and to the Reliability Assurance Agreement Among Load Serving Entities in the PJM Control Area. The NYISO, which has been diligently working with PJM, and ISO-New England, Inc. to develop a single Northeastern RTO. Consequently, the NYISO has a direct and substantial interest in this proceeding which cannot adequately be represented by any other party, and should be permitted to intervene herein.

III. Conclusion

The NYISO respectfully asks that the Commission grant its motion to intervene in this proceeding.

Respectfully submitted,

NEW YORK INDEPENDENT
SYSTEM OPERATOR, INC.

By _____
Counsel

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October 1, 2001

cc: Mr. Daniel L. Larcamp, Director Office of Markets, Tariffs and Rates, Room 8A-01,
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Ms. Alice M. Fernandez, Director Office of Markets, Tariffs and Rates—East Division,
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Ms. Andrea Wolfman, Lead Counsel, Market Oversight and Enforcement, Office of the
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each party designated on the official service list compiled by the Secretary in Docket No. RT01-2-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2001).

Dated at Washington, DC this 1st day of October, 2001.

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