

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Neptune Regional Transmission System, LLC)	
)	
Complainant)	
)	
v.)	Docket No. EL03-115-000
)	
Reliant Energy New Jersey Holdings, LLC,)	
and)	
Reliant Resources, Inc.)	
)	
Respondents)	

**MOTION TO INTERVENE OF THE
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 April 8, 2003 Notice of Filing, the New York Independent System Operator, Inc. (“NYISO”) hereby moves to intervene in this proceeding.

I. Copies of Correspondence

Communications regarding this proceeding should be addressed to:

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¹ 18 C.F.R. § 385.212 and 214 (2002).

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. The resolution of this proceeding is of interest to the NYISO because it could affect Neptune Regional Transmission System's ability to connect a new merchant transmission facility to the New York State transmission grid. That facility has the potential to bring significant market efficiency and system reliability benefits to New York State. The NYISO therefore has a direct and substantial interest in this proceeding. This interest cannot be adequately represented by any other party, and the NYISO should thus 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.

/s/ Ted J. Murphy
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Counsel for
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April 23, 2003

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. EL03-115-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2002).

Dated at Washington, DC this 23rd day of April, 2003.

/s/ Ted J. Murphy
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