

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

Rockland Electric Company and) **Docket Nos. EC02-7-000**
PJM Interconnection, L.L.C.) **and ER02-109-000**

**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 October 23, 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:

Robert E. Fernandez General Counsel and Secretary	Arnold H. Quint
Belinda R. Thornton, Director of Regulatory Affairs	Ted J. Murphy
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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 Rockland Electric Company’s (“Rockland”) and PJM

¹ 18 C.F.R. § 385.212 and 214 (2001).

Interconnection, L.L.C.'s ("PJM") joint filing of October 17, 2001², as corrected October 18, 2001, for approval to transfer operational control over Rockland's jurisdictional transmission facilities from the NYISO to PJM and requesting acceptance for filing of PJM's tariff revisions, executed PJM signature pages, and PJM's Membership Agreement. Rockland's request that operational control over transmission facilities under NYISO jurisdiction be transferred to PJM directly impacts the responsibilities and obligations of the NYISO. Consequently, the NYISO has a direct and substantial interest in this proceeding that 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

Arnold H. Quint
Ted J. Murphy
Hunton & Williams
1900 K Street, N.W.
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Of Counsel

² *Joint Application for Approval of Transfer of Operational Control Over Jurisdictional Facilities and Acceptance for Filing of Tariff Revisions, Executed Signature Pages, and Membership Agreement Under Sections 203 and 205 of the Federal Power Act.* Docket Nos. EC02-7-000 and ER02-109-000 (October 17, 2001).

November 7, 2001

cc: Daniel L. Larcamp, Director Office of Markets, Tariffs and Rates, Room 8A-01,
Tel. (202) 208-2088
Alice M. Fernandez, Director Office of Markets, Tariffs and Rates -- East
Division, Room 71-31, Tel. (202) 208-0089
Andrea C. Wolfman, Lead Counsel for Market Oversight and Enforcement,
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Stanley P. Wolf, Office of the General Counsel, Room 101-03,
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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 Nos. EC02-7-000 and ER02-109-000, 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, D.C. this 7th day of November.

Ted J. Murphy
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