

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

Transénergie U.S. Ltd.

)

Docket No. ER02-552-000

**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* issued on December 20, 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
Belinda F. Thornton, Director of Regulatory Affairs
New York Independent System Operator, Inc.
3890 Carman Road
Schenectady, NY 12303
Tel: (518) 356-7661
Fax: (518) 356-4702
rfernandez@nyiso.com
bthornton@nyiso.com

Arnold H. Quint
Ted J. Murphy
Hunton & Williams
1900 K Street, NW
Washington, DC 20006
Tel: (202) 955-1588
Fax: (202) 778-2201
aquent@hunton.com
tmurphy@hunton.com

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 a petition by Transénergie U.S. Ltd., on behalf of its special purpose project development subsidiary, Harbor Cable Company, LLC ("HCC"), for:

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

(i) blanket authority to make sales of transmission rights at negotiated rates; and (ii) certain regulatory waivers in connection with the proposed Harbor Cable transmission interconnector project. The project contemplates the construction of an underground and submarine transmission cable system that will better connect the grid controlled by PJM Interconnection, L.L.C. (“PJM”) with the grid controlled by the NYISO.

Because the proposed interconnection has the potential to materially affect the operation of the NYISO controlled grid, the NYISO has a direct and substantial interest in the outcome of this proceeding that cannot be adequately represented by any other party. Therefore, the Commission should grant the NYISO’s request for permission to intervene herein.

Respectfully submitted,

NEW YORK INDEPENDENT
SYSTEM OPERATOR, INC.

By _____
Counsel

Arnold H. Quint
Ted J. Murphy
Hunton & Williams
1900 K Street, NW
Washington, DC 20006
Of Counsel

January 4, 2002

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. ER02-552-000, 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 4th day of January, 2002.

Ted J. Murphy
Hunton & Williams
1900 K Street, N.W.
Washington, D.C. 20006-1109
(202) 955-1588