

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

ISO New England Inc.

)

Docket No. ER01- 2528-000

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

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure,<sup>1</sup> and the Commission's July 11, 2001 Notice of Filing, 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  
John P. Buechler,  
Director of Regulatory Affairs  
New York Independent System  
Operator, Inc.  
3890 Carman Road  
Schenectady, NY 12303  
Tel: (518) 356-6153  
Fax: (518) 356-4702  
rfernandez@nyiso.com  
jbuechler@nyiso.com

Arnold H. Quint  
Ted J. Murphy  
  
Hunton & Williams  
1900 K Street, N.W.  
Washington, D.C. 20006  
Tel: (202) 778-2274  
Fax: (202) 778-2201  
aquint@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 proposed Interregional Transmission Pilot Program between the PJM Interconnection, L.L.C. ("PJM") and the NYISO. The proposal will allow PJM

to call on certain New York generation to be redispatched to help alleviate congestion in PJM and will allow the NYISO to call on certain PJM generation to be redispatched to help alleviate congestion in New York. The ultimate objective is to develop an interregional operational protocol to facilitate the management of transmission congestion between the Northeastern ISOs during periods when interregional congestion is causing extreme operating conditions to exist in one or more regions. The NYISO therefore 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

Arnold H. Quint  
Ted J. Murphy  
Hunton & Williams  
1900 K Street, N.W.  
Washington, D.C. 20006-1109  
Of Counsel

July 27, 2001

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<sup>1</sup> 18 C.F.R. § 385.214 (2000).

cc: Mr. Daniel L. Larcamp, Director Office of Markets, Tariffs and Rates, Room 8A-01,  
Tel. (202) 208-2088  
Ms. Alice M. Fernandez, Director Office of Markets, Tariffs and Rates—East  
Division, Room 82-15, Tel. (202) 208-0089  
Ms. Andrea Wolfman, Office of the General Counsel, Room 101-29,  
Tel. (202) 208-2097  
Mr. Stanley Wolfe, Office of the General Counsel, Room 102-37,  
Tel. (202) 208-0891  
Mr. Michael Bardee, Office of the General Counsel, Room 101-09,  
Tel. (202) 208-2068

**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. ER01-2076-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 2010 (2000).

Dated at Washington, DC this 27th day of July, 2001.

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Hunton & Williams  
1900 K Street, N.W.  
Washington, DC 20006-1109  
(202) 955-1500