

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

**New England Power Pool** ) **Docket No. ER01-2534-000**

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 Notice of Filing of July 11, 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

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

<sup>2</sup> The NYISO respectfully requests waiver of 18 C.F.R. § 385.203(b)(3) to permit service on counsel for the NYISO in both New York and Washington, D.C.

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. On July 6, 2001, the New England Power Pool (NEPOOL) Participants Committee submitted changes to multiple Market Rules, to implement changes to the treatment of Installed Capability (ICAP) transactions with the goal of standardizing the trading of ICAP and firm Energy products across control area boundaries. The NEPOOL Participants Committee has requested an effective date of September 1, 2001.

These issues are of great interest to the NYISO, which recently filed with the Commission a Stage II ICAP Market Design. The NYISO continues to work with the New England Independent System Operator and PJM to facilitate the development of a common market in the Northeast. Commission action on the NEPOOL Participants Committee filing may directly affect the NYISO's efforts to coordinate an ICAP market, and the NYISO's markets. 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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Of Counsel

July 27, 2001

cc: Mr. Daniel L. Larcamp, Director Office of Markets, Tariffs and Rates, Room 8A-01,

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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. ER01-2534-000, 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 27<sup>th</sup> day of July 2001.

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