

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

**Conjunction LLC**

)

**Docket No. ER03-452-000**

**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,<sup>1</sup> and the Commission's Notice of Filing of January 15, 2003, the New York Independent System Operator, Inc. ("NYISO") hereby moves to intervene in the above-captioned proceeding involving Conjunction LLC's application for authority to sell transmission rights at negotiated rates and for certain limited waivers.<sup>2</sup>

**I. Copies of Correspondence**

Communications regarding this proceeding should be addressed to:

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<sup>1</sup> 18 C.F.R. § 385.212 and .214 (2002).

<sup>2</sup> Motions to intervene and protests in this proceeding were originally due on February 18, 2003. The NYISO respectfully requests that these comments be treated as timely because the Commission was closed on February 18 due to weather conditions in the Washington, D.C. area.

## **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. Conjunction LLC's filing is relates to a proposal to build a major new transmission facility that could better integrate the upstate and downstate portions of the NYISO-administered markets and improve reliability. 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  
Ted J. Murphy  
Counsel for  
New York Independent System Operator, Inc.

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February 19, 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. ER03-452-000, 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 19th day of February, 2003.

/s/ Ted J. Murphy  
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