

Island. This issue is of great interest to the NYISO, which operates the transmission grid throughout New York State, including Long Island. 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 _____
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August 3, 2001

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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. ER01-2584-000, 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, DC this 3rd day of August, 2001.

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