

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

**NEU Management Committee**

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**Docket No. ER01-2596-000**

**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 19, 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:

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**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 amendments to an Agreement with Respect to Use of Quebec Interconnection ("Restated Use Agreement"). The Restated Use Agreement is among

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<sup>1</sup> 18 C.F.R. § 385.214 (2001).

the financial supporters of the high voltage, direct current interconnection facilities between Quebec, Canada and New England (the “Interconnection”). Loss of the Interconnection constitutes the largest contingency for the Northeast as a whole. The operations of the line have a significant impact on transmission operations in New York. 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

Robert E. Fernandez  
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Schenectady, NY 12303

August 3, 2001

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  
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Ms. Andrea Wolfman, Office of the General Counsel, Room 101-29,  
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Mr. Stanley Wolfe, Office of the General Counsel, Room 102-37,  
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Mr. Michael Bardee, Office of the General Counsel, Room 101-09,  
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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. ER01-2596-000, 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 3<sup>rd</sup> day of August, 2001.

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