



March 11, 2011

Ms. Karen Antion
Chairwoman
Board of Directors
New York Independent System Operator
10 Krey Boulevard
Rensselaer, NY 12144

Mr. Stephen G. Whitley
President
New York Independent System Operator
10 Krey Boulevard
Rensselaer, NY 12144

Dear Ms. Antion:

As representative of several participants in NYISO shared governance, including a majority of the members of the Small End-User sector, we support the Consumer Protection Board's appeal of the Management Committee's ("MC's") decision at its February 24, 2011, meeting rejecting the motion to amend the NYISO's tariffs to provide a structure and funding mechanism for an End Use Consumer Sector Consultant.

Effective representation of all interest groups is essential to assure the credibility part of NYISO shared governance. As the ultimate payers of all electricity costs, End-users are the most important interest, yet consumers lack the resources to participate effectively in all the issues that come before NYISO governance. The numerous committees, working groups and task forces deal with complex and often obscure issues. No individual consumer can possibly devote sufficient resources to participate effectively in all the matters that affect service, quality, cost and reliability.

Other sectors are comprised of entities whose business activities are entirely or almost entirely conducted in the electric generation, utilities and/or related industries. These participants have the expertise and resources to dominate NYISO governance. While the expertise of energy industry participants must be respected, it is not always true that their interests are entirely consistent with either the public interest or the narrower consumer interest.

The MC secret ballot vote to deny funding for an expert to advice the End-user sector was ill-advised. The proposal in question, which the minutes of February 4 reflect, was supported unanimously by the End-users, was modest in scope and cost, but would have



provided much needed expertise to the End-user sector. This expertise is essential if consumers are to have effective representation of their interests at NYISO. We urge the Board to act on the Appeal of the Consumer Protection Board by reversing the decision of the Management Committee.

Respectfully submitted,

ss//John J. Dowling

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