

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

Richard Blumenthal, Attorney General For)	
The State of Connecticut, The Connecticut)	Docket No. EL05-150-000
Office of Consumer Counsel, the)	
Connecticut Municipal Electric Energy)	
Cooperative and the Connecticut Industrial)	
Energy Consumers)	
)	
v.)	
)	
ISO-New England, Inc.)	

**MOTION TO INTERVENE OF THE
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

Pursuant to Rule 214 of the Commission’s Rules of Practice and Procedure¹ and the Commission’s September 13, 2005 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:

Robert E. Fernandez
Vice President and General Counsel
Elaine Robinson
Director of Regulatory Affairs
New York Independent System Operator, Inc.
290 Washington Avenue Extension
Albany, NY 12203
Tel: (518) 356-6000
Fax: (518) 356-4702
rfernandez@nyiso.com
erobinson@nyiso.com

Ted J. Murphy
Michael E. Haddad
Hunton & Williams LLP
1900 K Street, NW
Washington, DC 20006-1109
Tel: (202) 955-1500
Fax: (202) 778-2201
tmurphy@hunton.com
mhaddad@hunton.com

¹ 18 C.F.R. § 385.214 (2005).

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 a complaint under Section 206 of the Federal Power Act filed by the Attorney General of Connecticut and other entities against ISO New England, Inc. (“ISO-NE”). The complaint requests that the Commission suspend market-based rate authority for all suppliers in Connecticut unless and until the Commission has empirical evidence that electricity markets in that state are competitive.

The NYISO is geographically adjacent to ISO-NE, and has been working closely with ISO-NE to reduce seams between the two regions. A large number of energy transactions occur between the NYISO and ISO-NE markets, including transactions between Connecticut and New York. For example, the Cross-Sound Cable, a high-voltage, direct current transmission line, directly links Connecticut with Long Island. Finally, a number of suppliers providing Installed Capacity service to New York are located in Connecticut.

Commission action on the complaint could have a significant impact on transactions between New York and Connecticut, and 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 therefore 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.

Michael E. Haddad

Counsel for
New York Independent System Operator, Inc.

Ted J. Murphy, Esq.
Michael E. Haddad, Esq.
Hunton & Williams LLP
1900 K Street, NW
Washington, DC 20006-1109

September 22, 2005

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. EL05-150-000 in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2005).

Dated at Washington, DC this 22nd day of September, 2005.

Michael E. Haddad
Hunton & Williams LLP
1900 K Street, N.W.
Washington, DC 20006-1109
(202) 955-1500