

Massachusetts, New Hampshire, Rhode Island and Vermont. It is funded through a regional tariff administered by ISO New England, Inc. (“ISO-NE”).¹ NESCOE’s purpose is to represent the interests of the New England citizens by advancing policies that will provide electricity at the lowest possible price over the long term, consistent with maintaining reliable service and environmental quality.

In the instant proceeding, ISO-NE asks the Commission to accept proposed values for Installed Capacity Requirements,² Local Sourcing Requirements, Maximum Capacity Limits, and Hydro Quebec Interconnection Capability Credits (“HQICCs”) to be used in the 2012/2013 Capability Year third annual reconfiguration auction and the 2013/2014 Capability Year second annual reconfiguration auction. As ISO-NE notes in its filing, the reconfiguration auctions adjust the amount of the Installed Capacity Requirement that load serving entities must procure for each Capability Year. The setting of these input values directly impacts the level of costs borne by New England electricity consumers.

Based on the foregoing, NESCOE has a direct and substantial interest in this proceeding, which is not adequately represented by any other party. In addition, NESCOE’s participation in this proceeding as the representative of the New England Governors will serve the public interest. NESCOE respectfully requests that it be permitted to intervene in this matter.

Respectfully submitted,

/s/ Elizabeth A. Grisaru
Elizabeth A. Grisaru
Whiteman Osterman & Hanna
One Commerce Plaza
Albany, New York 12260
Phone: (518) 487-7624
Mail to: egrisaru@woh.com

¹ ISO New England, Inc., 121 FERC ¶ 61,105 (2007).

² Capitalized terms not specifically defined in this motion shall have the meanings given to such terms in the ISO New England, Inc. Transmission, Markets and Services Tariff, the Second Restated New England Power Pool Agreement, and the Participants Agreement.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been served this day upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Albany, NY this 21st day of December, 2011.

Respectfully submitted,

/s/ Susan Ferrara
Susan Ferrara
Whiteman Osterman & Hanna
One Commerce Plaza
Albany, New York 12260
Mail to: sferrara@woh.com

Document Content(s)

Motion to Intervene- ICR and HQICCs 12-21-11.PDF.....1-3