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June 8, 2010

**VIA ELECTRONIC FILING**

The Honorable Mark J. Langer  
Clerk of the Court  
United States Court of Appeals  
for the District of Columbia Circuit  
E. Barrett Prettyman U.S. Courthouse  
Room 5423  
333 Constitution Ave., NW  
Washington, D.C. 20001

Re: *Richard Blumenthal, Attorney General for the State of Connecticut, and the Connecticut Office of Consumer Counsel v. Federal Energy Regulatory Commission, Case No. 10-1104, Motion of ISO New England Inc. for Leave to Intervene*

Dear Mr. Langer:

In accordance with Rules 15 and 27 of the Federal Rules of Appellate Procedure and the Rules of this Court, ISO New England Inc. submits for filing the enclosed Motion of ISO New England Inc. for Leave to Intervene. If there are any questions concerning this filing, please call me at (202) 661-2212.

Respectfully submitted,

/s/ Daniel R. Simon  
Daniel R. Simon, Esq.  
Counsel for ISO New England Inc.



established by the Northeast Power Coordinating Council (“NPCC”) and the North American Electric Reliability Corporation (“NERC”).

ISO-NE has a direct and substantial interest in this proceeding. The petition for review challenges the following two orders by respondent FERC: (1) *ISO New England Inc.*, Order Accepting Tariff Revisions, Docket No. ER10-154-000, 129 FERC ¶ 61,299 (December 30, 2009); and (2) *ISO New England Inc.*, Order Denying Rehearing, Docket No. ER10-154-001, 130 FERC ¶ 61,236 (March 25, 2010). Through these orders, FERC found that ISO-NE has adequately supported its 2010 administrative budget and accepted for filing ISO-NE’s tariff revisions to recover its administrative budget.

Any decision concerning this matter could have a substantial impact on ISO-NE’s budget and its responsibilities as administrator of the markets and bulk power system for New England, as well as its responsibility to protect the short-term reliability of the New England Control Area. The interests of ISO-NE in this proceeding cannot be adequately represented by any other party. Furthermore, intervention by ISO-NE will not prejudice any party, nor will it delay this proceeding.

For the foregoing reasons, ISO-NE respectfully requests that the Court grant its motion for leave to intervene in this proceeding.

Respectfully submitted,

*/s/ by consent*

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COUNSEL FOR ISO NEW ENGLAND  
INC.

Dated: June 8, 2010



**IN THE  
UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

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Richard Blumenthal, Attorney General for the	)	
State of Connecticut, and the Connecticut	)	
Office of Consumer Counsel,	)	
Petitioner,	)	
	)	
v.	)	Case No. 10-1104
	)	
Federal Energy Regulatory Commission,	)	
Respondent.	)	

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**DISCLOSURE STATEMENT OF ISO NEW ENGLAND INC.**

Pursuant to Circuit Rule 26.1, counsel for ISO New England Inc. hereby certifies that: ISO New England Inc. is a private, not-for-profit corporation organized under the laws of the State of Delaware that is responsible for operation of New England’s bulk power system. The New England region controlled by ISO New England Inc. encompasses Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont. ISO New England Inc. has no corporate parents and no publicly held company owns a 10% or more interest in ISO New England Inc.

Respectfully submitted,

/s/ by consent

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COUNSEL FOR ISO NEW ENGLAND  
INC.

Dated: June 8, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for Leave to Intervene and Corporate Disclosure Statement of ISO New England Inc. are being served electronically to all current parties to this proceeding, either through the CM/ECF system maintained by the U.S. Court of Appeals for the District of Columbia Circuit, or by U.S. Mail, as designated on the CM/ECF Service Preference Report for this proceeding.

Dated in Washington, D.C. this 8<sup>th</sup> day of June, 2010.

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