



July 9, 2015

**BY ELECTRONIC FILING AND FEDEX**

Stephen August, Esq.  
Presiding Officer  
Massachusetts Department of Public Utilities  
One South Station  
Boston, MA 02110  
(617) 305-3622

**Re: Petition of New England Power Company, d/b/a National Grid, D.P.U. 15-44/15-45**

Dear Mr. August:

In accordance with the Department of Public Utilities May 20, 2015 Notice of Adjudication and Notice of Public Comment Hearings and the applicable regulations, the ISO submits with this cover letter the original hard copy of the Petition to Intervene of ISO New England Inc. in the above-captioned proceeding, along with the associated certificate of service. The ISO is also submitting this Petition to Intervene by electronic filing.

Sincerely,

A handwritten signature in blue ink, reading "Theodore J. Paradise". The signature is fluid and cursive, with a large, sweeping "P" at the end.

Theodore J. Paradise, Esq.

Enclosure

cc: David Rosenzweig, Esq.

Service List

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

Petition of New England Power Company	)	
d/b/a National Grid for Approval to Construct	)	
and Operate a 345 kV Overhead Transmission	)	D.P.U. 15-44/15-45
Line on an Existing Right-of-Way in	)	
Tewksbury, Andover and Dracut, Massachusetts	)	
<u>Pursuant to G.L. c. 164, § 72 and for Zoning</u>	)	

PETITION OF ISO NEW ENGLAND INC.  
FOR LEAVE TO INTERVENE AS A PARTY

Pursuant to M.G.L. c. 30A § 10 and 220 C.M.R. 1.03, ISO New England Inc. (the "ISO") hereby petitions the Department of Public Utilities (the "Department") for leave to intervene as a party in the above proceedings, stating in support thereof the following:

1. The ISO is the private, non-profit entity that serves as the regional transmission organization ("RTO") for New England. The ISO plans and operates the New England bulk power system and administers New England's organized wholesale electricity market pursuant to the ISO New England Transmission, Markets and Services Tariff, the Transmission Operating Agreement with the New England Participating Transmission Owners, and according to reliability standards established by the Northeast Power Coordinating Council and the North American Electric Reliability Corporation.

2. The ISO is requesting intervenor status in the above-captioned proceeding because it has substantial interests that may be affected by the proceeding. The ISO is responsible for the day-to-day reliable operation of the New England region's bulk electric generation and transmission system and is charged by the Federal Energy Regulatory

Commission to plan for and ensure a reliable bulk power system for New England. The outcome of this proceeding will significantly affect the reliability of the electric system in New England, and the ISO therefore has significant interests at stake in this proceeding.

3. The DPU opened these dockets in response to the filing of New England Power (“NEP”) on April 14, 2015 for: (a) the Petition for Approval of a new 345 kilovolt (“kV”) overhead transmission line along existing transmission rights-of-way pursuant to G.L. c. 164, § 72; and (b) Request for Exemptions from the Zoning Bylaws of the Towns of Tewksbury, Andover and Dracut, Massachusetts, pursuant to G.L. c. 40A, § 3 (together, the “Petition”). The Petition seeks these authorizations in connection with NEP’s proposal to construct, operate and maintain a new 345 kilovolt (“kV”) electric transmission line (the “3124 Line”) within 6.5 miles of existing right-of-way between the Tewksbury 22A Substation in Tewksbury, Massachusetts and the Massachusetts/New Hampshire border (the “Project”). The Project is a component of the Merrimack Valley Reliability Project, which includes the Project and the 17.9-mile long continuation of the proposed 345 kV 3124 line in New Hampshire, terminating at the Public Service Company of New Hampshire -owned Scobie Pond Substation in Londonderry, New Hampshire.

4. Consistent with the Notice of Adjudication issued on May 20, 2015 and applicable regulations, the ISO requests that it be permitted to intervene as a party at this time in order to adequately represent and protect its interests in this proceeding. The ISO is substantially and specifically affected by this proceeding because it is responsible for the reliability of electric supply and transmission in the New England control area. The Project will have a significant impact on the reliability of the New England electric system. Therefore, the ISO has substantial interests that may be adversely affected by the outcome of this

proceeding.

5. This proceeding affords the exclusive means by which the ISO can protect those interests, and the ISO's interest in this matter cannot be adequately addressed or represented by any other party.

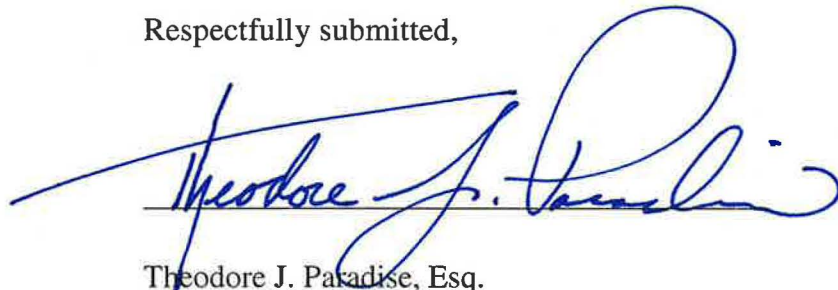
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6. All communications and correspondence for this proceeding should be directed to:

Theodore J. Paradise, Esq.  
Assistant General Counsel, Planning & Operations  
ISO New England Inc.  
One Sullivan Road  
Holyoke, MA 01040  
Email: [tparadise@iso-ne.com](mailto:tparadise@iso-ne.com)  
Telephone: 413-540-4585  
Facsimile: 413-535-4379

WHEREFORE, ISO New England Inc. requests that it be permitted to intervene in these proceedings as a full party.

Respectfully submitted,

A handwritten signature in blue ink, reading "Theodore J. Paradise", is written over a horizontal line. The signature is stylized with a large, looping initial 'P'.

Theodore J. Paradise, Esq.  
Assistant General Counsel, Planning & Operations  
ISO New England Inc.  
One Sullivan Road  
Holyoke, MA 01040

Dated: July 9, 2015

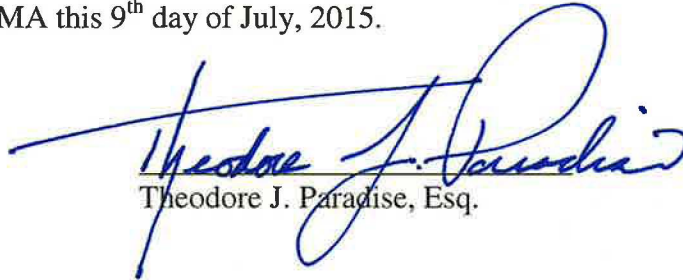
THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

D.P.U. Nos. 15-44 & 15-45

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure).

Dated at Holyoke, MA this 9<sup>th</sup> day of July, 2015.



Theodore J. Paradise, Esq.

Counsel for ISO New England Inc.