



July 27, 2015

BY ELECTRONIC FILING AND FEDEX

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

**Re: NSTAR Electric Company, d/b/a Eversource Energy,
EFSB 15-03 / D.P.U. 15-64 / 15-65**

Dear Mr. August:

In accordance with the Energy Facilities Siting Board June 8, 2015 Notice of Adjudication and Notice of Public Comment Hearings and the applicable regulations, ISO New England Inc. ("ISO") submits with this cover letter, an original and five, three-hole punched hard copies, of the Petition to Intervene of ISO New England Inc. in the above-captioned proceeding. Included with this filing are hardcopies of 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, Esq.", written over a horizontal line.

Theodore J. Paradise, Esq.

Enclosure

cc: Catherine Keuthen, Esq.

Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

| | | |
|--|---|---------------------------------|
| Petition of NSTAR Electric Company |) | |
| d/b/a Eversource Energy for Approval to |) | |
| Construct and Operate a New |) | EFSB 15-03 / D.P.U. 15-64/15-65 |
| 115-kV Transmission Line in |) | |
| Woburn, Winchester, Medford, Somerville, |) | |
| Boston , and Everett Pursuant to G.L. c. 164, § 72 |) | |
| And for Exemption from the |) | |
| Zoning Ordinance of the City of Woburn |) | |
| Pursuant to G.L. c. 40A, § 3 |) | |

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

Pursuant to M.G.L. c. 30A § 10, 980 C.M.R. § 1.05, and 220 C.M.R. § 1.03, ISO New England Inc. (the "ISO") hereby petitions the Energy Facility Siting Board (the "EFSB") 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. On May 20, 2015, NSTAR Electric Company, d/b/a Eversource Energy ("Eversource"), filed petitions with the EFSB and the Department of Public Utilities in connection with Eversource's proposal to construct and operate a new 7.7-mile 115-kilovolt ("kV") transmission line in Woburn, Winchester, Medford, Somerville, Everett and Boston and to modify the existing Woburn Substation and the existing Mystic Substation to interconnect the new 115kV line. On May 22, 2015, the Department of Public Utilities issued a Referral and Consolidation Order. On June 8, 2015, the EFSB issued a Notice of Adjudication and Public Comment Hearing, which set a deadline of July 29, 2015 to petition to intervene in the above-captioned proceedings.

4. Consistent with the Notice of Adjudication issued on June 8, 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.

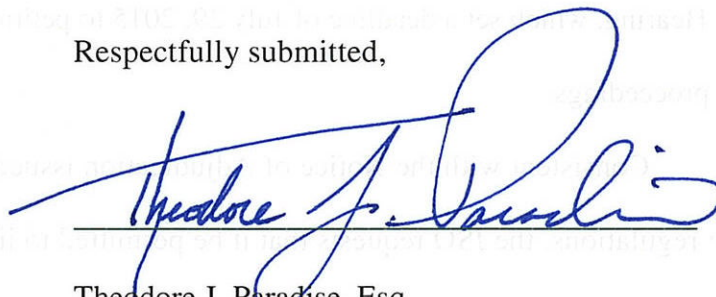
5. This proceeding affords the exclusive means by which the ISO can protect those interests, and the ISO's interest in this matter cannot be adequately addressed or represented by any other party.

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
Telephone: 413-540-4585
Facsimile: 413-535-4379

7. 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.

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

Dated: July 27, 2015

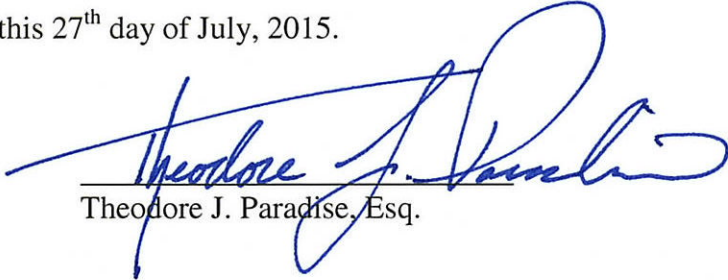
THE COMMONWEALTH OF MASSACHUSETTS
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CERTIFICATE OF SERVICE

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 27th day of July, 2015.


Theodore J. Paradise, Esq.

Counsel for ISO New England Inc.

