

LAW OFFICES

BALLARD SPAHR ANDREWS & INGERSOLL, LLP

601 13TH STREET NW, SUITE 1000 SOUTH

WASHINGTON, DC 20005-3807

202-661-2200

FAX: 202-661-2299

WWW.BALLARDSPAHR.COM

ATLANTA, GA
BALTIMORE, MD
BETHESDA, MD
DENVER, CO
LAS VEGAS, NV
LOS ANGELES, CA
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AUG 31 2009

RECEIVED

August 31, 2009

VIA HAND DELIVERY

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. 09-1220, Motion of ISO New England
Inc. for Leave to Intervene*

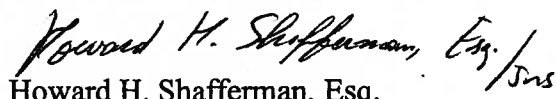
Dear Mr. Langer:

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 an original and four copies of the enclosed Motion of ISO New England Inc. for Leave to Intervene.

Also enclosed is an extra copy of this filing. Please have your staff date-stamp this extra copy and return it to the messenger making this delivery.

If there are any questions concerning this filing, please call me at (202) 661-2205.

Respectfully submitted,


Howard H. Shafferman, Esq.
Counsel for ISO New England Inc.

Enclosures

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

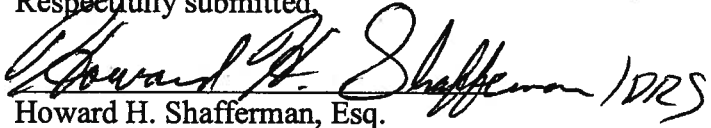
Case No. 09-1220

DMEAST #11744180 v1

Revisions, 125 FERC ¶ 61,392 (2008) and the *ISO New England Inc.*, Order Denying Rehearing, 127 FERC ¶ 61,254 (2009) of the Federal Energy Regulatory Commission ("FERC") with respect to FERC's acceptance of ISO-NE's filing to collect its administrative costs for the calendar year 2009. Any decision concerning this matter could have a substantial impact on ISO-NE's budget, staffing, management, and operations as well as its role and responsibilities as administrator of the markets and bulk power system for New England. Therefore, 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.

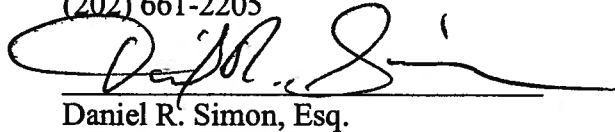
For the foregoing reasons, ISO-NE respectfully requests that the Court grant its motion for leave to intervene in this proceeding.

Respectfully submitted,

 10/25
Howard H. Shafferman, Esq.

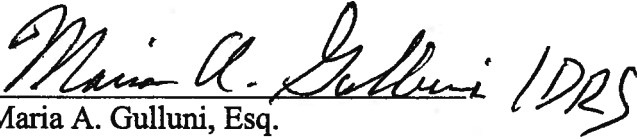
I.D. No. 28285

Ballard Spahr Andrews & Ingersoll, LLP
601 Thirteenth Street, N.W., Suite 1000 South
Washington, D.C. 20005
(202) 661-2205


Daniel R. Simon, Esq.

I.D. No. 51938

Ballard Spahr Andrews & Ingersoll, LLP
601 Thirteenth Street, N.W., Suite 1000 South
Washington, D.C. 20005
(202) 661-2212

 DR5

Maria A. Gulluni, Esq.
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
(413) 540-4473

COUNSEL FOR ISO NEW ENGLAND INC.

Dated: August 31, 2009

Richard Blumenthal, Attorney General for the State of)
Connecticut, and the Connecticut Office of Consumer)
Counsel,)

Case No. 09-1220

ORDER

Based on the Motion to Intervene filed in this proceeding by ISO New England Inc., any opposition thereto, and the record herein, it is this ____ day of _____, 200__,

ORDERED,

that the Motion to Intervene of ISO New England Inc. is granted.


**Richard Blumenthal, Attorney General for the State of
Connecticut, and the Connecticut Office of Consumer
Counsel,**
Petitioner,
v.
Federal Energy Regulatory Commission,
Respondent.

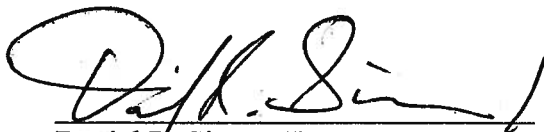
DISCLOSURE STATEMENT OF ISO NEW ENGLAND INC.

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,

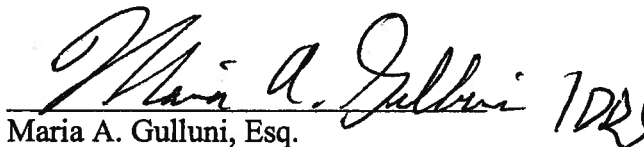

Howard H. Shafferman, Esq.
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Washington, D.C. 20005
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601 Thirteenth Street, N.W., Suite 1000 South
Washington, D.C. 20005
(202) 661-2212



Maria A. Gulluni, Esq.

ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
(413) 540- 4473

COUNSEL FOR ISO NEW ENGLAND INC.

Dated: August 31, 2009

**UNITED STATES COURT OF APPEALS
DISTRICT OF COLUMBIA CIRCUIT**

333 Constitution Avenue, NW
Washington, DC 20001-2866
Phone: 202-216-7000 | Facsimile: 202-219-8530

Case Caption: Richard Blumenthal, Attorney General for
the State of Connecticut, and the
Connecticut Office of Consumer Counsel

v.

Case No: 09-1220

Federal Energy Regulatory Commission

ENTRY OF APPEARANCE

Party Information

The Clerk shall enter my appearance as counsel for the following parties:

(List each party represented individually. Use an additional blank sheet as necessary)

☐ Appellant(s)/Petitioner(s) ☐ Appellee(s)/Respondent(s) ☒ Intervenor(s) ☐ Amicus Curiae

ISO New England Inc.

Names of Parties

Names of Parties

Counsel Information

Lead Counsel: Howard H. Shafferman

Direct Phone: (202) 661-2205 Fax: (202) 626-9036 Email: hhs@ballardspahr.com

2nd Counsel: Daniel R. Simon

Direct Phone: (202) 661-2212 Fax: (202) 626-9049 Email: simond@ballardspahr.com

3rd Counsel: _____

Direct Phone: (____) ____ - ____ Fax: (____) ____ - ____ Email: _____

Firm Name: Ballard Spahr Andrews & Ingersoll, LLP

Firm Address: 601 13th St., N.W., Suite 1000 South, Washington, D.C. 20005

Firm Phone: (202) 661-2200 Fax: (202) 661-2299 Email: n/a

Notes: This form must be submitted by a member of the Bar of the U.S. Court of Appeals for the D.C. Circuit.

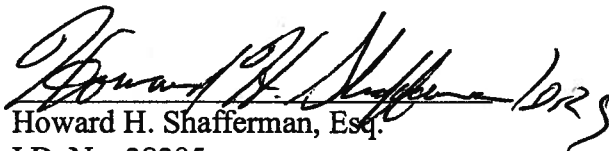
Names of non-member attorneys listed above will not be entered on the court's docket.

Applications for admission are available on the court's web site at <http://www.cadc.uscourts.gov/>

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Leave to Intervene, Corporate Disclosure Statement, and Entries of Appearance of ISO New England Inc. are being served, by first-class mail, upon the Office of the Solicitor of the Federal Energy Regulatory Commission, the Secretary of the Federal Energy Regulatory Commission, the Attorney General for the State of Connecticut, Richard Blumenthal, the Connecticut Office of Consumer Counsel, and each person designated on the official service list (attached) in the underlying proceeding before the Federal Energy Regulatory Commission.

Dated in Washington, D.C. this 31st day of August , 2009.


Howard H. Shafferman, Esq.

I.D. No. 28285
Ballard Spahr Andrews & Ingersoll, LLP
601 Thirteenth Street, N.W., Suite 1000 South
Washington, D.C. 20005
(202) 661-2205


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I.D. No. 51938
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Washington, D.C. 20005
(202) 661-2212


Maria A. Gulluni, Esq.

ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
(413) 540- 4473

COUNSEL FOR ISO NEW ENGLAND INC.

Official Service List of The Underlying Proceeding
From the Federal Energy Regulatory Commission

Connecticut Office of Attorney General	John Wright Assistant Attorney General Connecticut Office of Attorney General 10 Franklin Square New Britain, Connecticut 06051 john.wright@po.state.ct.us	Mary J. Healey Consumer Counsel Office of Consumer Counsel Ten Franklin Square New Britain, Connecticut 06051 Hartford Mary.Healey@ct.gov
Connecticut Office of Attorney General	Michael Wertheimer Assistant Attorney General Connecticut Office of Attorney General Attorney General's Office 10 Franklin Square New Britain, Connecticut 06051 michael.wertheimer@po.state.ct.us	**Richard Blumenthal Attorney General 55 Elm St Hartford, Connecticut 06106-1746 Hartford
Connecticut Office of Attorney General	Joseph Rosenthal Litigation Attorney Office of Consumer Counsel Ten Franklin Square New Britain, Connecticut 06051 joseph.rosenthal@ct.gov	
New England Power Pool Participants Committee	Paul Belval Partner Day Pitney LLP 242 Trumbull Street Hartford, Connecticut 06103 pnbelval@daypitney.com	Joel S. Gordon Director, Market Policy PSEG Power Connecticut LLC 7 Steeple Lane Amherst, New Hampshire 03031 Joel.Gordon@PESG.com
New England Power Pool Participants Committee	Anthony Gray Day Pitney LLP 242 Trumbull Street Hartford, Connecticut 06103 agray@daypitney.com	
Northeast Utilities Service Company	Andrew Katz Senior Counsel Northeast Utilities Service Company 901 F Street, Suite 602 Washington, DC 20004 katzas@nu.com	Joe Staszowski Director – ISO and Nepoch Reliability Northeast Utilities Operating Companies 107 Selden St Berlin, Connecticut 06037 staszjj@nu.com
	Contacts marked ** must be postal served	