



July 2, 2014

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 Avenue, NW
Washington, D.C. 20001

RE: *The Retail Energy Supply Association v. Federal Energy Regulatory
Commission,
Case No. 14-1105, Motion of ISO New England Inc. for Leave to Intervene*

Dear Mr. Langer:

In accordance with Rules 15(d) 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, Corporate Disclosure Statement and certificate of service.

If there are any questions concerning this filing, please call me at (413) 540-4585.

Respectfully submitted,

/s/ Theodore J. Paradise
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Counsel for ISO New England Inc.
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)	
The Retail Energy Supply Association,)	
Petitioner)	
v.)	Case No. 14-1105
)	
Federal Energy Regulatory Commission,)	
Respondent)	
)	

Pursuant to F.R.A.P. 15(d) and D.C. Cir. Rule 15(b), ISO New England Inc. (the “ISO”) hereby moves to intervene in the above-captioned petition for review. In this proceeding, The Retail Energy Supply Association (“RESA”) seeks review of the following orders issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”):

- The ISO is intervening generally in support of the Commission. As required by F.R.A.P. 26.1 and D.C. Cir. Rule 26.1, a Corporate Disclosure Statement for the ISO is enclosed with this pleading.

Created in 1997, the ISO is an independent, not-for-profit corporation responsible for the day-to-day reliable operation of New England's bulk power generation and transmission system; development and operation of the region's wholesale electricity markets, which opened in 1999; and management of a comprehensive regional bulk power system planning process. The ISO serves the New England region which includes Connecticut, Massachusetts, New Hampshire, Rhode Island, Vermont and the majority of Maine. In support of its functions, the ISO makes filings before the FERC as required by the Federal Power Act.¹

In the Initial Order, the Commission conditionally accepted the ISO's filing of its 2013-2014 Winter Reliability Program, consisting of demand response, oil inventory service, dual-fuel testing and market monitoring changes. The ISO conducted the program and filed the bid results with the Commission. In the Rehearing Order, the Commission rejected RESA's rehearing request relating to the Initial Order.

The ISO actively participated in the proceedings before the Commission that gave rise to this petition for review. Moreover, the ISO will be directly affected by the Court's decision in this proceeding. The Court should, therefore, grant this motion to intervene.

¹ 16 U.S.C. §§ 791a-825r (2010).

Respectfully submitted,

ISO New England Inc.

By: Theodore J. Paradise

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The Retail Energy Supply Association,)	
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)	
Federal Energy Regulatory Commission,)	
Respondent)	
)	

ISO New England Inc. (the “ISO”) is filing this Corporate Disclosure Statement in compliance with F.R.A.P. 26.1 and D.C. Cir. Rule 26.1. The ISO 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 the ISO encompasses Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont.

The ISO has no corporate parents. The ISO does not issue stock; therefore, no publicly held corporation owns 10% or more of its stock.

Respectfully submitted,

ISO New England Inc.

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CERTIFICATE OF SERVICE

In accordance with Fed. R. App. P. 25(d), and the court's Administrative Order Regarding Electronic Case Filing, I hereby certify that I have this day served the foregoing document upon each of the persons below.

Elizabeth Ward Whittle
Nixon Peabody LLP
401 9th Street, NW
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Washington, DC 20004-2128
Email: ewhittle@nixonpeabody.com

Dated at Holyoke, MA this 2nd day of July 2014.

Respectfully submitted,

ISO New England Inc.

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