



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: *TransCanada Power Marketing Ltd., v. Federal Energy Regulatory  
Commission,  
Case No. 14-1103, 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  
Theodore J. Paradise, Esq.  
Counsel for ISO New England Inc.  
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	)	
TransCanada Power Marketing, Ltd.,	)	
Petitioner	)	
v.	)	Case No. 14-1103
	)	
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, TransCanada Power Marketing, Ltd. (“TransCanada”) 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.<sup>1</sup>

In an order issued September 16, 2013, in a related proceeding (Docket No. ER13-1851-000),<sup>2</sup> 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 Results Order, the Commission conditionally accepted the bid results. In the Rehearing Order, the Commission rejected TransCanada's rehearing request relating to the Results 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

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<sup>1</sup> 16 U.S.C. §§ 791a-825r (2010).

<sup>2</sup> See *ISO New England Inc.*, 144 FERC ¶ 61,204 (September 16, 2013).

the Court's decision in this proceeding. The Court should, therefore, grant this motion to intervene.

Respectfully submitted,

ISO New England Inc.

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	)	
TransCanada Power Marketing, Ltd.,	)	
Petitioner	)	
v.	)	Case No. 14-1103
	)	
Federal Energy Regulatory Commission,	)	
Respondent	)	
	)	

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,

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Counsel for ISO New England Inc.

July 2, 2014

## **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 listed below.

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

Respectfully submitted,

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