

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England, Inc.
New England Power Pool

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DOCKET NO: ER09-1051-000

**MOTION TO INTERVENE OF CENTRAL MAINE POWER COMPANY AND
COMMENTS ON ISO NEW ENGLAND'S ORDER NO. 719 COMPLIANCE FILING**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's ("Commission" or "FERC") Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214, Central Maine Power Company ("CMP") hereby moves to intervene in the above-captioned docket and submits its comments on the Order 719 Compliance Filing of ISO New England, Inc. ("ISO-NE") made on April 28, 2009.

I. MOTION TO INTERVENE

CMP is a transmission and distribution utility operating in the State of Maine where it engages in the transmission and distribution of electric energy to retail customers in the southern, central and western regions of the State as well as serving wholesale customers located in the State. CMP is also a Participating Transmission Owner ("PTO") in ISO-NE under the terms of the Transmission Operating Agreement by and among the New England PTOs and the ISO-NE.

As a transmission and distribution utility operating in the New England region, and as a PTO with facilities under the operational control of ISO-NE, CMP has a direct and substantial interest in this proceeding that cannot be represented adequately by any other party. Therefore good cause exists to grant CMP full party status in this proceeding.

II. COMMUNICATIONS

Correspondence and communications concerning this proceeding should be addressed to the following persons, and it is requested that the names and addresses listed below be placed on the Commission's official service list for this proceeding.¹

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III. COMMENTS

CMP commends ISO-NE and the numerous stakeholders that participated in the RTO Responsiveness and Governance Working Group established by ISO-NE as part of its Order 719 compliance process. Through collaboration, discussion and compromise, significant positive reforms were achieved with regard to ISO-NE's cost sensitivity, transparency and responsiveness to customer and stakeholder concerns. Additional improvements, however, are possible and it is for this reason that CMP supports, in substantial part,² the Comments submitted by the Maine Public Utilities Commission ("MPUC") in this docket.

¹ Waiver of the Commission's regulations is requested to the extent necessary to permit the inclusion on the service list of the individuals listed.

² The MPUC also recommends that the compensation of ISO-NE executives be linked to their performance in fulfilling the cost related provisions of its mission statement. This proposal may be an additional worthwhile reform, but to the best of CMP's knowledge it was not the subject of any significant stakeholder discussions at ISO-NE. CMP accordingly recommends that this issue be first vetted through an appropriate stakeholder process before Commission consideration of it.

Specifically, CMP supports the adoption of the alternative mission statement language proffered by the MPUC and several other New England state commissions, which provides:

To ensure just and reasonable rates as mandated by the Federal Power Act and as determined by the Federal Energy Regulatory Commission, the ISO shall fulfill its mission at the lowest reasonable cost, consistent with the preceding principles ultimately to the benefit of all consumers who pay for electricity products and services. In evaluating any major ISO initiative that affects market design, system planning or operation of the New England bulk power system, and to improve the functioning of ISO-NE competitive markets for the benefit of consumers, the ISO will provide quantitative and qualitative information on the need for and the impacts, including costs, of the initiative.

CMP supported this “least reasonable cost” alternative throughout the Responsiveness and Governance Working Group process and was one of the 57% of NEPOOL participants that voted for its adoption. CMP believes it appropriate under the principles embodied in Order 719 that ISO-NE commit to fulfill its mission at the lowest reasonable cost for the benefit of all consumers in New England who pay for electricity products and services.

CMP also joins in the proposals to improve the transparency of the ISO-NE Board discussed in detail in the MPUC’s Comments. While CMP is mindful of ISO-NE’s status as a “private organization” with an independent board, the Company believes that the proposed posting of agendas and minutes for all meetings of the ISO-NE Board and its committees strikes an appropriate balance between ISO-NE’s concern that open meetings would chill frank debate and the stakeholders’ desire for increased transparency and responsiveness to stakeholder positions that may from time to time vary with those of ISO-NE’s management.

Finally, CMP joins in the MPUC’s recommendation that a regional consumer advocate be established within ISO-NE. Such a public advocate would provide consumers and other stakeholders across New England with an expert voice in ISO-NE stakeholder processes, especially those involving transmission planning and market development, both of which can result in significant cost impacts on customers.

IV. CONCLUSION

For the foregoing reasons, CMP requests that the Commission grant its intervention in this proceeding and direct ISO-NE to undertake the further reforms outlined herein.

Dated in Portland, Maine this 26th day of May, 2009

Respectfully submitted,

/s/ Jared S. des Rosiers

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