

November 30, 2007

**VIA ELECTRONIC FILING**

The Hon. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street NE  
Washington, DC 20426

Re: Amendments to the ISO New England Inc. Transmission, Markets and Services Tariff in Compliance with Order No. 890  
Docket No. ER08-54-000

Dear Secretary Bose:

On October 11, 2007, pursuant to Rule 1907 of the Federal Energy Regulatory Commission's ("FERC or the "Commission")<sup>1</sup> Rules of Practice and Procedure, 18 C.F.R. § 385.1907 (2007), Sections 205 and 206 of the Federal Power Act ("FPA"), and Parts 35 and 37 of the regulations of the Commission, ISO New England Inc. ("ISO-NE" or "ISO"), the Participating Transmission Owners ("PTOs"), the PTO Administrative Committee ("PTO AC"), Cross-Sound Cable Company, LLC ("CSC LLC"), the Schedule 20A Service Providers ("SSPs"), Maine Electric Power Company Inc. ("MEPCO"), and the New England Power Pool ("NEPOOL") (collectively, the "Filing Parties") jointly filed in the above-captioned docket proposed revisions to Sections I and II of the ISO Tariff to comply with the Commission's Order No. 890<sup>2</sup> on preventing undue discrimination or preference in transmission service (the "Order No. 890 Compliance Filing").

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<sup>1</sup> Capitalized terms used but not defined in this filing are intended to have the meanings given to such terms in the Second Restated New England Power Pool Agreement (the "Second Restated NEPOOL Agreement"), the Participants Agreement, or the ISO New England Inc. Transmission, Markets and Services Tariff ("ISO Tariff"), including the ISO-NE's Open Access Transmission Tariff ("ISO OATT"), which is Section II of the ISO Tariff, and Market Rule 1, which is Section III of the ISO Tariff. The ISO Tariff is available at [www.iso-ne.com/regulatory/tariff/index.html](http://www.iso-ne.com/regulatory/tariff/index.html).

<sup>2</sup> *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, 72 Fed. Reg. 12266 (March 15, 2007), *FERC Statutes and Regulations* ¶31,241 (2007), *reh'g pending* ("Order No. 890").

As noted above, the Order No. 890 Compliance Filing included changes to the ISO Tariff proposed under Section 205 of the FPA (the “205 Changes”). These changes are directly related to Order No. 890 compliance.<sup>3</sup>

Given the Commission’s statutory obligation to act on the 205 Changes within a period of 60 days<sup>4</sup> and in response to Commission staff concerns, the Filing Parties hereby waive the time limits placed on the Commission’s action by Section 205 of the FPA in order to allow the Commission enough time to consider the 205 Changes in combination with the compliance amendments.

The Filing Parties request that the Commission accept the Order No. 890 Compliance Filing as submitted and without modification or condition to become effective on October 11, 2007.

Respectfully submitted,

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/s/  
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<sup>3</sup> See Order No. 890 Compliance Filing at 40 (“the PTOs are mindful that Order No. 890 should not be used as a platform for proposing additional changes not directly related to Order No. 890 compliance under the ISO OATT.”).

<sup>4</sup> 16 U.S.C. § 824d (2000).

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**for MEPCO**



## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 30th day of November, 2007.

/s/ Lyndsey K. Sites

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