

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
PHILADELPHIA, PA
PHOENIX, AZ
SALT LAKE CITY, UT
VOORHEES, NJ
WASHINGTON, DC
WILMINGTON, DE

July 29, 2009

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: North American Electric Reliability Corporation,
Docket No. RM06-22-009;
Motion to Intervene of ISO New England Inc.**

Dear Secretary Bose:

Transmitted electronically for filing in the referenced docket is the Motion to Intervene of ISO New England Inc.

If there are any questions concerning this filing, please call me at (202) 661-7640.

Very truly yours,

/s/ Jack N. Semrani

Jack N. Semrani
Counsel for
ISO New England Inc.

Enclosure

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

**North American Electric Reliability
Corporation**

)
)
)
)

Docket No. RM06-22-009

MOTION TO INTERVENE OF ISO NEW ENGLAND INC.

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the “Commission”), 18 C.F.R. § 385.212 and 214 (2009), ISO New England Inc. (the “ISO”) moves to intervene in the above-captioned proceeding.

I. COMMUNICATIONS

Correspondence and communications regarding this filing should be addressed to the undersigned as follows:

Theodore J. Paradise*
Senior Regulatory Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
Tel: (413) 540-4585
Fax: (413) 535-4379
E-mail: tparadise@iso-ne.com

Daniel R. Simon*
Ballard Spahr Andrews & Ingersoll, LLP
601 13th Street, N.W., Suite 1000 South
Washington, D.C. 20005
Tel: (202) 661-2212
Fax: (202) 626-9049
E-mail: simond@ballardspahr.com

* Persons designated for service

II. BACKGROUND

In compliance with the order of the Commission dated January 27, 2009 regarding Mandatory Reliability Standards for Critical Infrastructure Protection,¹ the North American

¹ *Mandatory Reliability Standards for Critical Infrastructure Protection*, Order On Compliance Filing, 126 FERC ¶ 61,065 (2009).

Electric Reliability Corporation (“NERC”) submitted on June 30, 2009, modifications to Violation Risk Factors for four Requirements or Sub-Requirements in the Critical Infrastructure Protection (“CIP”) Reliability Standards CIP-002-1 through CIP-009-1. The Commission’s Notice of Filing set an intervention and comment date of July 29, 2009.

III. IDENTITY OF THE ISO

The ISO is the private, non-profit entity that serves as the regional transmission organization (“RTO”) for New England. The ISO operates the New England bulk power system and administers New England’s organized wholesale electricity markets pursuant to the ISO New England Inc. Transmission, Markets and Services Tariff, and the Transmission Operating Agreement with the New England Participating Transmission Owners.

In its capacity as an RTO, ISO-NE has the responsibility to protect the short-term reliability of the New England Control Area and to operate the system according to reliability standards established by the Northeast Power Coordinating Council (“NPCC”) and NERC. As the Balancing Authority for the New England region (except for the Maine Public Service Company territory in Northern Maine, which is interconnected to New Brunswick), the ISO plays a critical role in ensuring that the region’s bulk power system functions in a reliable manner.

IV. MOTION TO INTERVENE

The ISO moves to intervene in this proceeding. As the entity that plans and operates New England’s bulk power system consistent with NERC standards, the ISO has an interest that may be directly affected by the outcome of this proceeding, and the ISO’s interests cannot adequately be represented by any other party. The Commission therefore should grant this motion to intervene and grant the ISO full status as a party to this proceeding.

V. CONCLUSION

Wherefore, for the foregoing reasons, the ISO respectfully requests that it be permitted to intervene in, and be made a party to, the subject proceeding, with all rights attendant thereto.

/s/ Theodore Paradise
Theodore Paradise
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040
(413) 535-4000

Dated: July 29, 2009

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 Commission Secretary in these proceedings.

Dated at Washington, DC this 29th day of July, 2009.

/s/ Pamela S. Higgins

Pamela S. Higgins

Ballard Spahr Andrews & Ingersoll, LLP

601 13th Street, N.W., Suite 1000 South

Washington, D.C. 20005

(202) 661-2258