



October 27, 2009

VIA HAND DELIVERY

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

Re: Filing of ISO New England Inc. and New England Power Pool in Compliance with Order No. 719-A; Docket No. ER10-____-000

Dear Secretary Bose:

Pursuant to Rule 1907 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the "Commission"),¹ 18 C.F.R. § 385.1907 (2008), and Order Nos. 719 and 719-A,² ISO New England Inc. (the "ISO"), joined by the New England Power Pool Participants Committee ("NEPOOL") (together, the "Filing Parties"), hereby submit an original and five (5) copies of this compliance filing, proposing to add new Sections III.13.1.4.9, III.13.1.4.9.1 and III.E.1.6 to Market Rule 1 (the "Order No. 719-A Compliance Amendments").

I. INTRODUCTION

On July 16, 2009, the Federal Energy Regulatory Commission ("FERC") issued an order on rehearing in the rulemaking proceeding in Docket No. RM07-19 involving various reforms to the organized electric markets. Order No. 719-A requires the ISO to make a compliance filing no later than October 27, 2009 addressing the treatment of aggregators of retail customers (which the Commission refers to as "ARCs") that participate in the wholesale capacity and electricity markets.

¹ 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 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.

² *Wholesale Competition in Regions with Organized Electric Markets*, Order No. 719, 73 Fed. Reg. 64100 (October 28, 2008), FERC Stats. & Regs. ¶ 31,281 (2008) ("Order No. 719"), *Order on Reh'g*, Order No. 719-A, 74 Fed. Reg. 37776 (July 29, 2009), FERC Stats. & Regs. ¶ 31,292 (2009) ("Order No. 719-A").

Specifically, Order No. 719-A requires RTOs and ISOs to amend their market rules, as necessary, to preclude acceptance of bids

from ARCs that aggregate the demand response of: (1) the customers of utilities that distributed more than 4 million MWh in the previous fiscal year, where the relevant electric retail regulatory authority [("RERRA")] prohibits such customers' demand response to be bid into organized markets by an ARC, or (2) the customers of utilities that distributed 4 million MWh or less in the previous fiscal year, unless the relevant electric retail regulatory authority permits such customers' demand response to be bid into organized markets by an ARC.³

This compliance filing responds to that requirement.

II. DESCRIPTION OF THE FILING PARTIES; COMMUNICATIONS

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 market pursuant to the Tariff and the Transmission Operating Agreement with the New England Participating Transmission Owners. In its capacity as an RTO, the ISO 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 the North American Electric Reliability Corporation ("NERC").

NEPOOL is a voluntary association organized in 1971 pursuant to the New England Power Pool Agreement, and it has grown to include more than 410 members. The Participants include all of the electric utilities rendering or receiving service under the Tariff, as well as independent power generators, marketers, load aggregators, brokers, consumer-owned utility systems, end users, demand resource providers, developers and a merchant transmission provider. Pursuant to revised governance provisions accepted by the Commission,⁴ the Participants act through the NEPOOL Participants Committee. The Participants Committee is authorized by Section 6.1 of the Second Restated NEPOOL Agreement and Section 8.1.3(c) of the Participants Agreement to represent NEPOOL in proceedings before the Commission. Pursuant to Section 2.2 of the Participants Agreement, "NEPOOL provide[s] the sole Participant Processes for advisory voting on ISO matters and the selection of ISO Board members, except for input from state regulatory authorities and as otherwise may be provided in the Tariff, TOA and the Market Participant Services Agreement included in the Tariff."

All correspondence and communications in this proceeding should be addressed to the undersigned for the ISO as follows:

³ Order No. 719-A at P 51.

⁴ *ISO New England Inc., et al.*, 109 FERC ¶ 61,147 (2004).

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And to NEPOOL as follows:

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III. DESCRIPTION OF THE ORDER NO. 719-A COMPLIANCE AMENDMENTS

The Order No. 719-A Compliance Amendments add a new section and subsection to Market Rule 1, and a new section to Appendix E of Market Rule 1, in order to comply with the ARC-related requirements of Order No. 719-A described in Section I above.

New Section III.13.1.4.9 prohibits the registration of a Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource (and requires the retirement of a previously registered asset of this type, in accordance with new Section III.13.1.4.9.1) if it is comprised of:

⁵ Due to the joint nature of this filing, the Filing Parties respectfully request a waiver of Section 385.203(b)(3) of the Commission's regulations to allow the inclusion of more than two persons on the service list in this proceeding.

(a) customers of Host Utilities⁶ that distributed more than 4 million MWh in the previous fiscal year if the RERRA prohibits such customers' demand response to be bid into the ISO-administered markets or programs unless the registering Market Participant is the Host Utility serving those customers; or (b) customers of Host Utilities that distributed 4 million MWh or less in the previous fiscal year, unless the RERRA permits such customers' demand response to be bid into the ISO-administered markets or programs or the registering Market Participant is, or is acting on behalf of, the Host Utility serving those customers.

New subsection III.13.1.4.9.1 allows a Market Participant to retire previously registered assets a maximum of 12 months from the date that the ISO receives notice that the RERRA prohibits the customer's demand response to be bid into the ISO-administered markets or programs or by May 31, 2013, whichever is later.

New Section III.E.1.6 prohibits the registration of a (and requires the retirement of a previously registered) Load Response Program Asset if it is comprised of: (a) customers of Host Utilities that distributed more than 4 million MWh in the previous fiscal year if the RERRA prohibits such customers' demand response to be bid into the ISO-administered markets or programs unless the registering Market Participant is the Host Utility serving those customers; or (b) customers of Host Utilities that distributed 4 million MWh or less in the previous fiscal year, unless the RERRA permits such customers' demand response to be bid into the ISO-administered markets or programs or the registering Market Participant is, or is acting on behalf of, the Host Utility serving those customers.

The ISO believes that the Order No. 719-A Compliance Amendments are consistent with the guidance provided by the Commission in a September 14, 2009 order involving tariff revisions by PJM.⁷ The PJM Order, addressing the impact of retirement of capacity resources in response to RERRA actions in the context of PJM's capacity market (the "RPM"), stated:

We are concerned that the reliability-centered purpose for which the RPM tariff construct was established could be undermined if policies adopted by a retail regulatory authority to restrict the eligibility of demand to participate in the RPM market were implemented in a manner that requires changes to the results of completed RPM auctions. We agree with Industrial Customers that a capacity resource should be permitted to fulfill its RPM capacity obligation in the Delivery Year for which its bid cleared and receive compensation for that performance. This approach also accounts for PJM's concerns as to both reliability issues and the potential unintended assessment of large penalties on demand response providers. Therefore, we direct PJM to clarify in its compliance filing that, with respect to RPM, PJM will effectuate such retail regulatory authority policies prospectively by precluding affected resources from offering capacity in auctions that are conducted subsequent to the effective date of those policies.

⁶ "Host Utility" is defined in Section I.2.2(m) of the ISO Tariff as "a Market or Governance Participant transmission or distribution provider that reconciles the loads within the metering domain with OP-18 compliant metering."

⁷ *PJM Interconnection, L.L.C.*, 128 FERC ¶ 61,238 (2009) (the "PJM Order").

Specifically, the ISO highlights that proposed subsection III.13.1.4.9.1, as noted above, does not require the retirement of Order 719-A-affected previously-registered Assets until the later of May 31, 2013 or 12 months after the date the ISO receives notice that RERRA prohibits such customer's demand response to be bid into the ISO-administered markets. This delays the retirement of previously registered assets associated with Demand Resources that received Capacity Supply Obligations in the first three Forward Capacity Auctions.

Additionally, the language that allows a Market Participant to aggregate retail customers "on behalf of" a Host Utility applies narrowly to the situation in which a Market Participant has contracted with a Host Utility to administer the Host Utility's retail aggregation program by providing aggregation-related services. This type of administrative role is distinct from the type of role to which Order 719-A applies.

IV. STAKEHOLDER PROCESS

On September 22, 2009, the ISO presented to the NEPOOL Markets Committee proposed additions to Market Rule 1 (a new Section III.13.1.4.9, entitled "Restrictions on Real-Time Demand Response Asset, Real-Time Emergency Generation Asset, On-Peak Demand Resource and Seasonal Peak Demand Resource Registration" and a new Section III.E.1.6, entitled "Restrictions on Load Response Asset Registration") to comply with the above-stated requirement of Order No. 719-A. The ISO's proposed market rule changes included provisions to restrict the registration of assets and require the retirement of previously registered assets in regions where a Host Utility's relevant electric retail regulatory authority prohibited customer participation through a third-party aggregator.

During the September 22 meeting, several Markets Committee members raised concerns that the proposed rule language in light of the PJM Order might unduly restrict certain Market Participants' ability to satisfy the Capacity Supply Obligations they obtained in prior Forward Capacity Auctions. An amendment was proposed that would delay the retirement of previously registered assets that were associated with Demand Resources that received Capacity Supply Obligations in the first three Forward Capacity Auctions.

Both the ISO's proposed market rule additions (offered as the main motion) and the amended market rule additions (offered as a motion to amend the main motion) failed with votes of 51.5% and 59.95%, respectively.

To address the concerns expressed at the Markets Committee meeting and pursuant to subsequent discussions with Participants, the ISO revised the additions as proposed to the Markets Committee and added a new proposed Section III.13.1.4.9.1.

At its October 9, 2009 meeting, the NEPOOL Participants Committee voted, with one opposition and one abstention, to support the ISO's revised proposal. The market rule additions, as supported by the Participants Committee, are the Order No. 719-A Compliance Amendments filed herewith.

V. REQUESTED EFFECTIVE DATE

The Filing Parties request an effective date of June 1, 2010 for the Order No. 719-A Compliance Amendments. This is the date by which the ISO will have systems and business processes in place to implement the Order No. 719-A Compliance Amendments. That date also corresponds to the start of the Forward Capacity Market's first Capacity Commitment Period.

VI. ADDITIONAL SUPPORTING INFORMATION

Section 35.13 of the Commission's regulations generally requires public utilities to file certain cost and other information related to an examination of traditional cost-of-service rates. However, the market rule changes do not modify a traditional "rate" and the ISO is not a traditional investor-owned utility. Therefore, to the extent necessary, the Filing Parties request waiver of Section 35.13 of the Commission's regulations.⁸ Notwithstanding its request for waiver, the Filing Parties submit the following additional information in substantial compliance with relevant provisions of Section 35.13 of the Commission's regulations:

35.13(b)(1) – Materials included herewith are as follows:

- ◆ This transmittal letter;
- ◆ Attachment 1: Redlined tariff sheets reflecting the Order No. 719-A Compliance Amendments;
- ◆ Attachment 2: Clean tariff sheets reflecting the Order No. 719-A Compliance Amendments; and
- ◆ Attachment 3: List of governors and utility regulatory agencies in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont to which a copy of this filing has been sent.

35.13(b)(2) – The Filing Parties request that the Order No. 719-A Compliance Amendments become effective on June 1, 2010.

35.13(b)(3) – Pursuant to Section 17.11(e) of the Participants Agreement, Governance Participants are being served electronically rather than by paper copy. The names and addresses of the Governance Participants are posted on the ISO's website at http://www.iso-ne.com/regulatory/ferc/nepool/gov_ptcpts_eserved.pdf. A paper copy of this transmittal letter and the accompanying materials have also been sent to the governors and electric utility regulatory agencies for the six New England states that comprise the New England Control Area, and to NECPUC. The names and addresses of these governors and regulatory agencies are shown in Attachment 3. In accordance with Commission rules and practice, there is no need for the Governance Participants or the entities identified on Attachment 3 to be included on the

⁸ 18 C.F.R. § 35.13 (2009).

Commission's official service list in the captioned proceeding unless such entities become intervenors in this proceeding.

35.13(b)(4) – A description of the materials submitted pursuant to this filing is contained in Sections III and VI of this transmittal letter.

35.13(b)(5) – The reasons for this filing are discussed in Section III of this transmittal letter.

35.13(b)(6) – The ISO's approval of these changes is evidenced by this filing. These changes reflect the results of the Participant Processes required by the Participants Agreement and reflect the support of the Participants Committee.

35.13(b)(7) – Neither the ISO nor NEPOOL has knowledge of any relevant expenses or costs of service that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

35.13(b)(8) – A form of notice and electronic media are no longer required for filings in light of the Commission's Combined Notice of Filings notice methodology.

35.13(c)(1) – The market rule changes herein do not modify a traditional "rate." The statement required under this Commission regulation is not applicable to this filing.

35.13(c)(2) – The ISO does not provide services under other rate schedules that are similar to the wholesale, resale and transmission services it provides under the ISO Tariff.

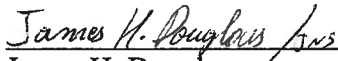
35.13(c)(3) - No specifically assignable facilities have been or will be installed or modified in connection with the revisions contained herein.

VII. CONCLUSION

The Filing Parties request that the Commission accept the Order No. 719-A Compliance Amendments as submitted, and without modification or condition.

Respectfully submitted,

ISO NEW ENGLAND INC.

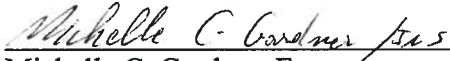


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NEW ENGLAND POWER POOL PARTICIPANTS COMMITTEE



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Enclosures

Attachment 1

III.13.1.4.8.2. New Active Demand Resources. Project Sponsors of new Critical Peak, Real-Time Demand Response, and Real-Time Emergency Generation Demand Resources shall use the results of the ISO's most recent Demand Resource Operable Capacity Analysis to establish the Demand Reduction Values and Capacity Values of their project. To the extent the ISO's most recent Demand Resource Operable Capacity Analysis includes location-specific estimates of Demand Resource Critical Peak Hours, Real-Time Demand Response Event Hours, and/or Real-Time Emergency Generation Event Hours, the Project Sponsor shall use the appropriate location-specific estimates of such hours in establishing the Demand Reduction Values and Capacity Values of their project. Such Demand Reduction Values and Capacity Values shall at least be based on the quantities of Demand Resources that cleared in the most recent Forward Capacity Auction. If the Qualification Package submitted by the Project Sponsor does not clearly describe how the ISO's most recent Demand Resource Operable Capacity Analysis results were used to establish the Demand Reduction Values and Capacity Values of their project, the ISO shall not qualify the project.

III.13.1.4.8.3. Demand Resource Operable Capacity Analysis Results. The ISO shall perform a Demand Resource Operable Capacity Analysis, which estimates the expected dispatch hours of active Demand Resources given different assumed levels of Demand Resources clearing in the primary Forward Capacity Auction, prior to each primary Forward Capacity Auction. The Demand Resource Operable Capacity Analysis shall be performed: (i) on a system-wide and Load Zone basis, (ii) at least 30 business days prior to the Existing Capacity Qualification Deadline, with the exception that the Demand Resource Operable Capacity Analysis shall

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III.13.1.4.9. Restrictions on Real-Time Demand Response Asset, Real-Time Emergency Generation Asset, On-Peak Demand Resource and Seasonal Peak Demand Resource Registration: A Market Participant may not register and, if previously registered, must retire in accordance with Section III.13.1.4.9.1, a Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource that is comprised of:

- (a) the customers of Host Utilities that distributed more than 4 million MWh in the previous fiscal year if the relevant electric retail regulatory authority prohibits such customers' demand response to be bid into the ISO-administered markets or programs unless the Market Participant registering the Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand

Resource or Seasonal Peak Demand Resource is the Host Utility serving the customers comprising the Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource, or

(b) the customers of Host Utilities that distributed 4 million MWh or less in the previous fiscal year, unless the relevant electric retail regulatory authority permits such customers' demand response to be bid into the ISO-administered markets or programs or the Market Participant registering the Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource is, or is acting on behalf of, the Host Utility serving the customers comprising the Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource.

III.13.1.4.9.1. Requirement for Real-Time Demand Response Asset, Real-Time Emergency Generation Asset, On-Peak Demand Resource and Seasonal Peak Demand Resource

Retirement: A Market Participant must retire a previously registered Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource that is comprised of customers specified in subsections (a) or (b) of Section III.13.1.4.9 no later than 12 months from the date that the ISO receives notice that the relevant electric retail regulatory authority prohibits such customer's demand response to be bid into the ISO-administered markets or programs or May 31, 2013, whichever is later.

III.E.1.5 General Requirements. A Load Response Program Asset cannot span multiple Load Zones; beginning with the Capacity Commitment Period starting June 1, 2011, a Real-Time Demand Response Asset cannot span multiple Dispatch Zones. All Load Response Program Assets are required to have interval metering or an approved Measurement and Verification Plan (“M&V Plan”); Market Participants with Real-Time Demand Response Assets in the Load Response Program must comply with the approved M&V Plan for the associated Real-Time Demand Response Resource.

III.E.1.6 Restrictions on Load Response Asset Registration: A Market Participant may not register and must retire if previously registered a Load Response Program Asset that is comprised of:

- (a) the customers of Host Utilities that distributed more than 4 million MWh in the previous fiscal year, if the relevant electric retail regulatory authority prohibits such customers’ demand response to be bid into the ISO-administered markets or programs unless the Market Participant registering the Load Response Program Asset is the Host Utility serving the customers comprising the Load Response Program Asset, or
- (b) the customers of Host Utilities that distributed 4 million MWh or less in the previous fiscal year, unless the relevant electric retail regulatory authority permits such customers’ demand response to be bid into the ISO-administered markets or programs or the Market Participant registering the Load Response Program Asset is, or is acting on behalf of, the Host Utility serving the customers comprising the Load Response Program Asset.

Attachment 2

III.13.1.4.8.2. New Active Demand Resources. Project Sponsors of new Critical Peak, Real-Time Demand Response, and Real-Time Emergency Generation Demand Resources shall use the results of the ISO's most recent Demand Resource Operable Capacity Analysis to establish the Demand Reduction Values and Capacity Values of their project. To the extent the ISO's most recent Demand Resource Operable Capacity Analysis includes location-specific estimates of Demand Resource Critical Peak Hours, Real-Time Demand Response Event Hours, and/or Real-Time Emergency Generation Event Hours, the Project Sponsor shall use the appropriate location-specific estimates of such hours in establishing the Demand Reduction Values and Capacity Values of their project. Such Demand Reduction Values and Capacity Values shall at least be based on the quantities of Demand Resources that cleared in the most recent Forward Capacity Auction. If the Qualification Package submitted by the Project Sponsor does not clearly describe how the ISO's most recent Demand Resource Operable Capacity Analysis results were used to establish the Demand Reduction Values and Capacity Values of their project, the ISO shall not qualify the project.

III.13.1.4.8.3. Demand Resource Operable Capacity Analysis Results. The ISO shall perform a Demand Resource Operable Capacity Analysis, which estimates the expected dispatch hours of active Demand Resources given different assumed levels of Demand Resources clearing in the primary Forward Capacity Auction, prior to each primary Forward Capacity Auction. The Demand Resource Operable Capacity Analysis shall be performed: (i) on a system-wide and Load Zone basis, (ii) at least 30 business days prior to the Existing Capacity Qualification Deadline, with the exception that the Demand Resource Operable Capacity Analysis shall

be performed at least 30 business days prior to the first day of the Forward Capacity Auction for the Capacity Commitment Period beginning June 1, 2011, and (iii) based on the quantities of resources that cleared in the most recent Forward Capacity Auction and on the quantities of resources from recently submitted Show of Interest Forms for the upcoming Forward Capacity Auction.

III.13.1.4.9. Restrictions on Real-Time Demand Response Asset, Real-Time Emergency Generation Asset, On-Peak Demand Resource and Seasonal Peak Demand Resource Registration: A Market Participant may not register and, if previously registered, must retire in accordance with Section III.13.1.4.9.1, a Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource that is comprised of:

- (a) the customers of Host Utilities that distributed more than 4 million MWh in the previous fiscal year if the relevant electric retail regulatory authority prohibits such customers' demand response to be bid into the ISO-administered markets or programs unless the Market Participant registering the Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource is the Host Utility serving the customers comprising the Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource, or

- (b) the customers of Host Utilities that distributed 4 million MWh or less in the previous fiscal year, unless the relevant electric retail regulatory authority permits such customers' demand response to be bid into the ISO-administered markets or programs or the Market Participant registering the Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource is, or is acting on behalf of, the Host Utility serving the customers comprising the Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource.

III.13.1.4.9.1. Requirement for Real-Time Demand Response Asset, Real-Time Emergency Generation Asset, On-Peak Demand Resource and Seasonal Peak Demand Resource

Retirement: A Market Participant must retire a previously registered Real-Time Demand Response Asset, Real-Time Emergency Generation Asset or asset associated with an On-Peak Demand Resource or Seasonal Peak Demand Resource that is comprised of customers specified in subsections (a) or (b) of Section III.13.1.4.9 no later than 12 months from the date that the ISO receives notice that the relevant electric retail regulatory authority prohibits such customer's demand response to be bid into the ISO-administered markets or programs or May 31, 2013, whichever is later.

III.E.1.5 General Requirements. A Load Response Program Asset cannot span multiple Load Zones; beginning with the Capacity Commitment Period starting June 1, 2011, a Real-Time Demand Response Asset cannot span multiple Dispatch Zones. All Load Response Program Assets are required to have interval metering or an approved Measurement and Verification Plan (“M&V Plan”); Market Participants with Real-Time Demand Response Assets in the Load Response Program must comply with the approved M&V Plan for the associated Real-Time Demand Response Resource.

III.E.1.6 Restrictions on Load Response Asset Registration: A Market Participant may not register and must retire if previously registered a Load Response Program Asset that is comprised of:

- (a) the customers of Host Utilities that distributed more than 4 million MWh in the previous fiscal year, if the relevant electric retail regulatory authority prohibits such customers’ demand response to be bid into the ISO-administered markets or programs unless the Market Participant registering the Load Response Program Asset is the Host Utility serving the customers comprising the Load Response Program Asset, or
- (b) the customers of Host Utilities that distributed 4 million MWh or less in the previous fiscal year, unless the relevant electric retail regulatory authority permits such customers’ demand response to be bid into the ISO-administered markets or programs or the Market Participant registering the Load Response Program Asset is, or is acting on behalf of, the Host Utility serving the customers comprising the Load Response Program Asset.

Attachment 3

**New England Governors
and Utility Regulatory
and Related Agencies**

Connecticut

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Connecticut Department of Public Utility Control
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Maine

The Honorable John E. Baldacci
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Augusta, ME 04333-0001

Maine Public Utilities Commission
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Massachusetts

The Honorable Deval Patrick
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One South Station
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New Hampshire

The Honorable John H. Lynch
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Concord, NH 03301

New Hampshire Public Utilities Commission
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Rhode Island

The Honorable Donald L. Carcieri
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Rhode Island Public Utilities Commission
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Vermont

The Honorable James H. Douglas
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**New England Governors
and Utility Regulatory
and Related Agencies**

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