



July 1, 2010

VIA HAND DELIVERY

The Honorable Kimberly D. Bose, Secretary
The Honorable Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
Room 1A-East, First Floor
888 First Street, N.E.
Washington, D.C. 20426

**Re: ISO New England Inc. and New England Power Pool, Docket No. ER10-____-000
Revision to ISO-NE Forward Reserve Market Credit Calculation**

Request for Expedited Comment Date of July 14 and Final Order by August 17, 2010

Dear Secretary Bose and Deputy Secretary Davis:

Pursuant to Section 205 of the Federal Power Act (“FPA”),¹ ISO New England Inc. (the “ISO”) joined by the New England Power Pool (“NEPOOL”) Participants Committee² (“NEPOOL”) (together, the “Filing Parties”) hereby submit an original and five copies of this transmittal letter and revised tariff sheets to change the Forward Reserve Credit formula used to calculate payments in the Forward Reserve Market (“FRM”) (the “Tariff Change”). The Tariff Change applies to the Forward Reserve Credit Calculation for a Reserve Zone only if the ISO denied, for reliability reasons, the option for resources to prorate the MWs that are subject to Capacity Supply Obligations in the Forward Capacity Market (“FCM”) for the Capacity Zone containing that Reserve Zone. Under the Tariff Change, in those narrow circumstances, the Forward Reserve Credit calculation will net the Capacity Clearing Price adjusted as described in Section III.13.2.7.3(b) of the FCM rules, rather than the Capacity Clearing Price.

¹ 16 U.S.C. § 824d (2006 and Supp. II 2009).

² Capitalized terms used but not otherwise defined in this filing have the meanings ascribed thereto in the ISO’s Transmission, Markets and Services Tariff (FERC Electric Tariff No. 3) (the “Tariff”), the Second Restated New England Power Pool Agreement, and the Participants Agreement. Market Rule 1 is Section III of the ISO Tariff.

In order for the Tariff Change to accomplish its purpose it must become effective before the FRM auction for the Winter Capability Period for 2010/11 that begins on August 18, 2010. Accordingly, the Filing Parties request waiver of the sixty-day prior notice requirement in order to allow the Tariff Change to become effective on August 17, 2010. The Filing Parties also request that the Commission issue an order accepting the revisions no later than August 17, 2010, and that the Commission set an expedited comment date of July 14, 2010. The Filing Parties provide further support and justification for this request in Section III of this transmittal letter.

I. 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 ISO New England Transmission, Markets and Services 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 Council (“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 430 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, developers, demand resource providers, and a merchant transmission provider. Pursuant to revised governance provisions accepted by the Commission,³ 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.”

³ *ISO New England Inc., et al.*, 109 FERC ¶ 61,147 (2004).

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II. STANDARD OF REVIEW

The Tariff Change is submitted pursuant to Section 205 of the FPA, which “gives a utility the right to file rates and terms for services rendered with its assets.”⁵ Under Section 205, the

⁴ 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.

⁵ *Atlantic City Elec. Co. v. FERC*, 295 F.3d 1, 9 (D.C. Cir. 2002).

Commission “plays ‘an essentially passive and reactive’ role”⁶ whereby it “can reject [a filing] only if it finds that the changes proposed by the public utility are not ‘just and reasonable.’”⁷ The Commission limits this inquiry “into whether the rates proposed by a utility are reasonable – and [this inquiry does not] extend to determining whether a proposed rate schedule is more or less reasonable than alternative rate designs.”⁸ The Tariff Change filed herein “need not be the only reasonable methodology, or even the most accurate.”⁹ As a result, even if an intervenor or the Commission develops an alternate proposal, the Commission must accept this Section 205 filing if it is just and reasonable.¹⁰

III. DESCRIPTION OF THE TARIFF CHANGE

The Tariff Change modifies the value that is netted from the Forward Reserve Auction Clearing Price to determine how much a Market Participant will be paid for providing Forward Reserves. Currently, under Section III.9.8 of Market Rule 1, a Market Participant that provides Forward Reserves is paid an amount equal to the product of its Final Forward Reserve Obligation and the applicable hourly Forward Reserve Payment Rate. The Forward Reserve Payment Rate is calculated under Section III.9.8 of Market Rule 1 by subtracting (i) the FCA Clearing Price for the Capacity Zone in which the Reserve Zone is located from (ii) the Forward Reserve Auction Clearing Price for the applicable Reserve Zone divided by the number of hours in the month associated with the Forward Reserve Delivery Period. For the Rest of System Reserve Zone, which includes, in whole or in part, several Capacity Zones, the highest FCA Clearing Price among the several Capacity Zones is used to determine the Rest of System Forward Reserve Payment Rate. This calculation mechanism was accepted by the Commission in December 2009 as part of a package of FRM changes to conform to the FCM.¹¹

The rationale for the settlement mechanism described above is that the FRM is intended to provide compensation for the incremental costs of maintaining fast start generating resources that are able to provide the ten-minute and thirty-minute reserve products that are procured

⁶ *Id.* at 10 (quoting *City of Winnfield v. FERC*, 744 F.2d 871, 876 (D.C. Cir. 1984)).

⁷ *Id.* at 9.

⁸ *Cities of Bethany, Bushnell, et al. v. FERC*, 727 F.2d 1131, 1136 (D.C. Cir.), *cert. denied*, 469 U.S. 917 (1984) (“*Cities of Bethany*”); *see also ISO New England Inc.*, 114 FERC ¶ 61,315 at P 33 and n.35 (2005), citing *Pub. Serv. Co. of New Mexico v. FERC*, 832 F.2d 1201, 1211 (10th Cir. 1987) and *Cities of Bethany* at 1136.

⁹ *Oxy USA, Inc. v. FERC*, 64 F.3d 679, 692 (D.C. Cir. 1995) (citing *Cities of Bethany* at 1136).

¹⁰ *Cf. Southern California Edison Co., et al.*, 73 FERC ¶ 61,219 at 61,608 n.73 (1995) (“Having found the Plan to be just and reasonable, there is no need to consider in any detail the alternative plans proposed by the Joint Protesters.”) (citing *Cities of Bethany* at 1136).

¹¹ *See* Letter Order Accepting Revisions to Forward Reserve Market Rules, issued in Docket No. ER09-1766 on December 8, 2009.

through the Forward Reserve Market.¹² Resources that are assigned obligations in the FRM, however, are also eligible to receive Capacity Supply Obligations in the FCM. The Tariff is designed so that resources are not paid twice for the same capacity and, accordingly, the clearing price from the FCA is deducted from the clearing price from the FRM to determine the payment rate.¹³

In the first Forward Capacity Auction (“FCA”), all resources in the Connecticut Reserve Zone were denied, for reliability reasons, the option to prorate the MWs associated with their Capacity Supply Obligations and instead received the Capacity Clearing Price adjusted as described in Section III.13.2.7.3(b) of the FCM rules. Specifically, their effective per-kW-month compensation was \$4.26/kW-month, which was \$0.24/kW-month less than the \$4.50/kW-month Capacity Clearing Price resulting from the first FCA. Under the FRM design, and assuming competitive conditions, FRM offers would normally be the sum of the incremental cost to provide Forward Reserves and the (known) FCA capacity rate that will be netted in the FRM settlement.¹⁴ This allows all FRM participants to compete based upon incremental Forward Reserve costs within a Reserve Zone. Under the current Tariff language, presuming that the offers in the FRM are submitted under competitive conditions, the FCA capacity rate would be the Capacity Clearing Price and would be a constant within all offers. Similarly, under the Tariff Change, again presuming that the offers in the FRM are submitted under competitive conditions, the FCA capacity rate would be the Capacity Clearing Price adjusted as described in Section III.13.2.7.3(b) of the FCM rules to account for prorationing and would be a constant within all offers. Thus, under both circumstances, there should be no change in the Forward Reserve Payment Rate due to the Tariff Change (this assumes that the price cap is not binding). The FCA capacity rate netted in the FRM settlement is the same for all Market Participants offering a FRM product for a Reserve Zone. It is not a resource-specific rate, and it is not linked to the recovery of actual costs. The FCA capacity rate may be different than the rate at which a resource is actually paid in the FCM settlement. These aspects of the FRM design are not modified by the Tariff Change.

While the Tariff Change is worded such that it could apply to all Forward Reserve Credit calculations going forward, it only has a practical impact for the Forward Reserve Credits

¹² See filing by ISO New England Inc. and New England Power Pool Filing in Docket No. ER09-1766 (filed September 29, 2009), accepted in delegated letter order dated December 8, 2009, at p. 7.

¹³ See *id.* at p. 8.

¹⁴ The market design contemplates that, when a bidder formulates its competitive offer, it considers incremental costs for providing forward reserves such as expected foregone energy revenues, expected foregone commitment costs, expected FRM penalties, incremental O&M and capacity investment and a risk premium associated with providing forward reserves. Given the settlement rule for the FRM, the market design also contemplates that the bidder includes in its offer the FCA clearing price that will be deducted during FRM settlement. Both the FRM settlement rule and the FCA clearing price are known prior to the FRM auction.

calculated for the 2010/2011 Winter Capability Period (October 1, 2010 to May 31, 2011). The reason for this is that, based on the outcomes from the first three FCAs, the only Reserve Zones in which resources were denied, for reliability reasons, the option to prorate MWs were those associated with the first FCA, which is coincident with the 2010/2011 Capacity Commitment Period (June 1, 2010 to May 31, 2011). Since the option to prorate MWs was not denied in the second and third Capacity Commitment Periods, the Tariff Change is not applicable to the calculation of the Forward Reserve Credits in those years. Further, the Tariff Change will not impact the calculation of Forward Reserve Credits for the fourth FCA and beyond because, pursuant to the changes accepted by the Commission in Docket No. ER10-787-000, resources that are denied the option to prorate will be paid the Capacity Clearing Price.¹⁵ Thus, the Tariff Change simply provides that Market Participants that were denied the option to prorate MWs in the first Capacity Commitment Period will receive Forward Reserve Credits that reflect the FCA Capacity Clearing Price adjusted as described in Section III.13.2.7.3(b).

IV. STAKEHOLDER PROCESS

The Tariff Change was broadly although not unanimously supported by the Market Participants. At its June 8-9, 2010 meeting, the Markets Committee voted to recommend its support for the Tariff Change with 85.1% in favor. The Tariff Change was voted by the NEPOOL Participants Committee at its June 22-23, 2010 meeting, and received an 84.8% Vote in favor.¹⁶ A few Participants opposed the Tariff Change, expressing concerns that this change could lead to increased FRM costs and that the recovery of those costs might not be possible under already negotiated bilateral contracts pursuant to which those Participants are serving load.

V. REQUESTED EFFECTIVE DATE AND REQUEST FOR WAIVER

Pursuant to Section 35.11 of the Commission's rules and regulations, 18 C.F.R. § 35.11, the Filing Parties request waiver of the sixty-day notice requirement so that the Tariff Change may become effective on August 17, before the beginning of the auction for the FRM Winter Capability Period for 2010/2011 on August 18, 2010. The Filing Parties also request that the Commission issue an order no later than August 17 accepting the revisions, and that the Commission set an expedited comment date of July 14, 2010.

As explained below, good cause exists to grant these requests. The FRM auction for the 2010/2011 Winter Capability Period begins on August 18, 2010, and the settlement rule for

¹⁵ See *ISO New England, Inc. and New England Power Pool Participants Committee*, 131 FERC ¶ 61,065 at PP 157-165 (2010).

¹⁶ The individual Sector Votes were Generation (17.1% in favor), Transmission (8.55% in favor), Supplier (10.45% in favor), Alternative Resources (14.5% in favor), Publicly Owned Entity (17.1% in favor), and End User (17.1% in favor).

Forward Reserve Credits must be known prior to the auction. The 2010/2011 Winter Capability Period is coincident with the first Capacity Commitment Period (June 1, 2010 to May 31, 2011) which includes Reserve Zones with resources that were denied the option to prorate MWs.

The shortened comment period should not interfere with the ability of any intervening party to address any concerns with the Tariff Change in responsive pleadings, since the Tariff Changes have been under consideration in the NEPOOL stakeholder process for some time and NEPOOL counsel advised Market Participants when the changes were voted and passed that accelerated treatment would be sought for these rules.

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.¹⁷ However, the Tariff Change is associated with the FRM and is not a traditional "rate." Further, the Filing Parties are not traditional investor-owned utilities. Therefore, to the extent necessary, the Filing Parties request waiver of Section 35.13 of the Commission's regulations. Notwithstanding their request for waiver, the Filing Parties submit the additional information enumerated below in substantial compliance with relevant provisions of Section 35.13.

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

- ◆ This transmittal letter;
- ◆ Attachment 1: Tariff sheets reflecting in blackline the change reflected in this filing;
- ◆ Attachment 2: Clean Tariff sheets incorporating the change reflected in this filing;
- ◆ Attachment 3: NEPOOL Participants Committee Vote Tally;
- ◆ Attachment 4: List of governors and utility regulatory agencies in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont to which a copy of this filing is being e-mailed.

35.13(b)(2) – As noted above, the Filing Parties request that the modification of the Tariff submitted with this filing become effective on August 17, 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->

¹⁷ 18 C.F.R. § 35.13 (2010).

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ne.com/regulatory/ferc/nepool/gov_prtcpts_eserved.pdf. A copy of this transmittal letter and the accompanying materials have also been e-mailed to the governors and electric utility regulatory agencies for the six New England states that comprise the New England Control Area, and to the New England Conference of Public Utility Commissioners (“NECPUC”). The names and e-mail addresses of these governors and regulatory agencies are shown in Attachment 4. In accordance with Commission rules and practice, there is no need for the Governance Participants or the entities identified on Attachment 4 to be included on the 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 this transmittal letter.

35.13(b)(5) - The reasons for this filing are discussed in 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 approval and support of the Participants Committee.

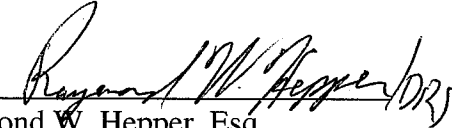
35.13(b)(7) - The Filing Parties have no knowledge of any relevant expenses or costs of service that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

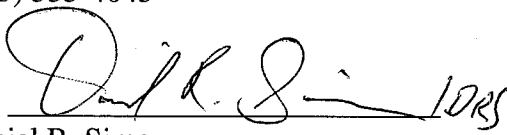
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VII. CONCLUSION

For the foregoing reasons, the Filing Parties respectfully request that the Commission approve the Tariff Change described herein, to become effective on August 18, 2010, without condition or change.

ISO NEW ENGLAND INC.

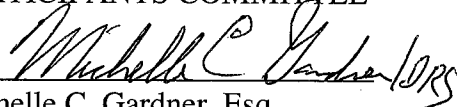
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Attachment 1

III.9.8 Forward Reserve Credits. Payment for Forward Reserve is based upon a Market Participant's Final Forward Reserve Obligation and the applicable Forward Reserve Clearing Prices. The ISO shall calculate these credits on an hourly basis for each Reserve Zone as follows:

- (a) Final Forward Reserve Obligations for TMNSR and TMOR for each Market Participant are calculated for each Reserve Zone for each hour as follows:
- (i) Final Forward Reserve Obligation = minimum [Forward Reserve Obligation, Forward Reserve Delivered Megawatts]

- (b) $FCACP_{Zone}$ and $FRACP_{Zone}$ are defined as:
- $FCACP_{Zone}$ for a Reserve Zone is the Forward Capacity Auction Clearing Price for the Capacity Zone in which the Reserve Zone is contained. If proration of capacity resources within a Reserve Zone is rejected for reliability reasons pursuant to Section III.13.2.7.3(b)(iv), then for that Reserve Zone the Forward Capacity Auction Clearing Price in the calculation shall be adjusted as described in Section III.13.2.7.3(b).

$FCACP_{Zone}$ for the "Rest of System" Reserve Zone defined in Section III.2.7(d) is the maximum Forward Capacity Auction Clearing Price for all Capacity Zones included in whole or in part in the "Rest of System" Reserve Zone.

$FRACP_{Zone}$ is the Forward Reserve Auction Clearing Price for the relevant Reserve Zone, for TMNSR or TMOR, respectively;

~~(c) Market Participant Forward Reserve Credit for TMNSR = Final
Forward Reserve Obligation for TMNSR multiplied by the
applicable hourly Forward Reserve Payment Rate for
TMNSR;
where,~~

(c) Market Participant Forward Reserve Credit for TMNSR =
Final Forward Reserve Obligation for TMNSR multiplied
by the applicable hourly Forward Reserve Payment Rate
for TMNSR;

where,

the hourly Forward Reserve Payment Rate for TMNSR is equal to:

maximum of [(applicable monthly FRACP_{Zone} for TMNSR – FCACP_{Zone}), 0] divided by the number of hours in the month associated with the Forward Reserve Delivery Period.

(d) Market Participant Forward Reserve Credit for TMOR =
Final Forward Reserve Obligation for TMOR multiplied by
the applicable hourly Forward Reserve Payment Rate for
TMOR; where,

the hourly Forward Reserve Payment Rate for TMOR is equal to:

maximum of [(applicable monthly FRACP_{Zone} for TMOR – FCACP_{Zone}), 0] divided by the number of hours in the month associated with the Forward Reserve Delivery Period.

III.9.9 Forward Reserve Charges. For each hour, the ISO will allocate the total of the Forward Reserve Credits, Forward Reserve Failure-to-Reserve Penalties and Forward Reserve Failure-to-Activate Penalties for each Load Zone that are calculated separately for TMNSR and TMOR, to each Market Participant for each hour, as follows:

Attachment 2

III.9.8 Forward Reserve Credits. Payment for Forward Reserve is based upon a Market Participant's Final Forward Reserve Obligation and the applicable Forward Reserve Clearing Prices. The ISO shall calculate these credits on an hourly basis for each Reserve Zone as follows:

- (a) Final Forward Reserve Obligations for TMNSR and TMOR for each Market Participant are calculated for each Reserve Zone for each hour as follows:
 - (i) Final Forward Reserve Obligation = minimum [Forward Reserve Obligation, Forward Reserve Delivered Megawatts]

- (b) $FCACP_{Zone}$ and $FRACP_{Zone}$ are defined as:
 $FCACP_{Zone}$ for a Reserve Zone is the Forward Capacity Auction Clearing Price for the Capacity Zone in which the Reserve Zone is contained. If proration of capacity resources within a Reserve Zone is rejected for reliability reasons pursuant to Section III.13.2.7.3(b)(iv), then for that Reserve Zone the Forward Capacity Auction Clearing Price in the calculation shall be adjusted as described in Section III.13.2.7.3(b).

$FCACP_{Zone}$ for the "Rest of System" Reserve Zone defined in Section III.2.7(d) is the maximum Forward Capacity Auction Clearing Price for all Capacity Zones included in whole or in part in the "Rest of System" Reserve Zone.

$FRACP_{Zone}$ is the Forward Reserve Auction Clearing Price for the relevant Reserve Zone, for TMNSR or TMOR, respectively;

- (c) Market Participant Forward Reserve Credit for TMNSR =
Final Forward Reserve Obligation for TMNSR multiplied
by the applicable hourly Forward Reserve Payment Rate
for TMNSR;

where,

the hourly Forward Reserve Payment Rate for TMNSR is
equal to:

maximum of [(applicable monthly $FRACP_{Zone}$ for
TMNSR – $FCACP_{Zone}$), 0] divided by the number
of hours in the month associated with the Forward
Reserve Delivery Period.

- (d) Market Participant Forward Reserve Credit for TMOR =
Final Forward Reserve Obligation for TMOR multiplied by
the applicable hourly Forward Reserve Payment Rate for
TMOR; where,

the hourly Forward Reserve Payment Rate for TMOR is
equal to:

maximum of [(applicable monthly $FRACP_{Zone}$ for
TMOR – $FCACP_{Zone}$), 0] divided by the number of
hours in the month associated with the Forward
Reserve Delivery Period.

III.9.9 Forward Reserve Charges. For each hour, the ISO will allocate the total
of the Forward Reserve Credits, Forward Reserve Failure-to-Reserve
Penalties and Forward Reserve Failure-to-Activate Penalties for each Load
Zone that are calculated separately for TMNSR and TMOR, to each
Market Participant for each hour, as follows:

Attachment 3

**NEPOOL PARTICIPANTS COMMITTEE
VOTE TAKEN AT JUNE 23, 2010 MEETING
REVISIONS TO FORWARD RESERVE CREDITS CALCULATION**

TOTAL

Participant Name	VOTE
GENERATION	17.10
TRANSMISSION	8.55
SUPPLIER	10.45
ALTERNATIVE RESOURCES	14.50
PUBLICLY OWNED ENTITY	17.10
END USER	17.10
% IN FAVOR	84.80

GENERATION SECTOR

Participant Name	VOTE
Boston Generating, LLC	F
Caithness New England Services	F
Dighton Power, LLC	F
Dominion Energy Marketing, Inc.	F
Entergy Nuclear Power Marketing LLC	F
International Power America (ANP Funding I, LLC)	F
Millennium Power Partners	F
Mirant Energy Trading, LLC	F
NAEA Energy Massachusetts, LLC	F
NextEra Energy Resources, LLC	A
NRG Power Marketing, LLC	F
TransCanada Power Marketing Ltd.	F
Verso Maine Energy LLC	F
IN FAVOR (F)	12
OPPOSED (O)	0
TOTAL VOTES	12
ABSTENTIONS (A)	1

TRANSMISSION SECTOR

Participant Name	VOTE
Bangor Hydro-Electric Company	A
Central Maine Power Company	O
New England Power Company	F
Northeast Utilities System Companies	O
NSTAR Electric Company	F
The United Illuminating Company	A
Vermont Electric Power Company	A
IN FAVOR (F)	2
OPPOSED	2
TOTAL VOTES	4
ABSTENTIONS (A)	3

SUPPLIER SECTOR

Participant Name	VOTE
BP Energy Company	O
Brookfield Energy Marketing Inc./CSC	F
Consolidated Edison Energy, Inc.	F
Constellation Energy Commodities Group	O
CP Energy Marketing (US) Inc.	A
DC Energy, LLC	F
Dynegy Power Marketing, Inc.	F
Energy America, LLC	O
Exelon Generation, LLC	F
GDF SUEZ Energy Marketing NA, Inc. / FirstLight	A
Granite Ridge/Merrill Lynch Commodities/BoA	F
Hess Corporation	O
H.Q. Energy Services (U.S.) Inc.	F
Integrus Energy Services, Inc.	O
Kimberly-Clark Corporation	A
Linde Energy Services, Inc.	O
LIPA	F
Pepco Energy Services, Inc.	O
Pinpoint Power	F
PPL EnergyPlus, LLC	F
PSEG Energy Resources & Trade	F
IN FAVOR (F)	11
OPPOSED	7
TOTAL VOTES	18
ABSTENTIONS (A)	3

ALTERNATIVE RESOURCES SECTOR

Participant Name	VOTE
Renewable Generation Sub-Sector	
Gas Recovery Systems, Inc.	F
Distributed Generation Sub-Sector	
Small DG Group Member	F
Load Response Sub-Sector	
Conservation Services Group	F
CPower, Inc.	F
EnerNOC, Inc.	F
Vermont Energy Investment Corp.	F
Small LR Group Member	F
LR Provisional Group Member	A
IN FAVOR (F)	7
OPPOSED	0
TOTAL VOTES	7
ABSTENTIONS (A)	1

**NEPOOL PARTICIPANTS COMMITTEE
VOTE TAKEN AT JUNE 23, 2010 MEETING
REVISIONS TO FORWARD RESERVE CREDITS CALCULATION**

PUBLICLY OWNED ENTITY SECTOR

Participant Name	VOTE
Ashburnham Municipal Light Plant	A
Boylston Municipal Light Department	A
Chicopee Municipal Lighting Plant	A
Conn. Municipal Electric Energy Coop.	F
Concord Municipal Light Plant	A
Groton Electric Light Department	A
Holden Municipal Light Department	A
Holyoke Gas & Electric Department	A
Hudson Light and Power Department	A
Hull Municipal Lighting Plant	A
Ipswich Municipal Light Department	A
Littleton (NH) Water & Light Dept.	A
Mansfield Municipal Electric Dept.	A
Marblehead Municipal Light Dept.	A
Mass. Municipal Wholesale Electric Co	A
Middleborough Gas and Electric Dept.	A
Middleton Municipal Electric Dept.	A
New Hampshire Electric Cooperative	A
Paxton Municipal Light Department	A
Peabody Municipal Light Plant	A
Princeton Municipal Light Department	A
Rowley Municipal Lighting Plant	A
Shrewsbury's Electric & Cable Ops	A
South Hadley Electric Light Dept.	A
Sterling Municipal Electric Light Dept.	A
Taunton Municipal Lighting Plant	A
Templeton Municipal Lighting Plant	A
Vermont Electric Cooperative	A
Wakefield Municipal Gas & Light Dept.	A
West Boylston Municipal Lighting Plant	A
Westfield Gas & Electric Light Dept.	A
IN FAVOR (F)	1
OPPOSED	0
TOTAL VOTES	1
ABSTENTIONS (A)	30

END USER SECTOR

Participant Name	VOTE
511 Plaza, LP	F
Conservation Law Foundation	F
CT Office of Consumer Counsel	F
Corinth Wood Pellets, LLC	F
Dennis Beverage	F
Dragon Products Company	F
Elektrisola, Inc.	F
Fairchild Semiconductor Corporation	F
Food City, Inc.	F
Garland Manufacturing Company	F
Hammond Lumber Company	F
Hardwood Products Company	F
Industrial Energy Consumer Group	F
LaBree's Inc.	F
Lavalley Lumber Co.	F
Maine Skiing, Inc.	F
Maine Woods Pellet Company	F
Marden's Inc.	F
Mass. Attorney General's Office	F
Mead Oxford	F
Merchants Plaza LLC	F
NH Office of Consumer Advocate	F
PalletOne of Maine	F
PowerOptions, Inc.	F
Praxair, Inc.	A
Quality Egg of New England	F
RJF – Morin Brick LLC	F
Robbins Lumber	F
St. Anselms College	F
St. Joseph Health Services of RI	F
Union of Concerned Scientists	F
Westerly Hospital	F
Whole Foods Market Group, Inc.	F
Z-TECH, LLC	F
IN FAVOR (F)	33
OPPOSED	0
TOTAL VOTES	33
ABSTENTIONS (A)	1

Attachment 4

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