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May 12, 2010

**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. RD10-11-000;  
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) 661-2205.

Very truly yours,

*/s/ Howard H. Shafferman*

Howard H. Shafferman  
Counsel for  
ISO New England Inc.

Enclosure

DMEAST #12433134 v1

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

**North American Electric Reliability  
Corporation**                    )  
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  )  
  )

**Docket No. RD10-11-000**

**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:

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## **II. BACKGROUND**

On April 21, 2010, the North American Electric Reliability Corporation (“NERC”) submitted a petition for approval of an interpretation to Reliability Standard CIP-001-1 - Cyber Security - Sabotage Reporting, Requirement R2. The Commission’s Notice of Filing set an intervention and comment date of May 12, 2010.

## **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, 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 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 J. Paradise  
Theodore J. Paradise  
Senior Regulatory Counsel  
ISO New England Inc.  
One Sullivan Road  
Holyoke, MA 01040  
(413) 535-4000

Dated: May 12, 2010

## 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 12<sup>th</sup> day of May, 2010.

/s/ Pamela S. Higgins

Pamela S. Higgins

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