

STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No. 7373

Joint Petition of Vermont Electric Power)
Company, Inc., Vermont Transco, LLC, and)
Central Vermont Public Service Corporation for a)
certificate of public good, pursuant to 30 V.S.A.)
Section 248, authorizing the construction of the)
Southern Loop Transmission Upgrade Project)

MOTION TO INTERVENE

NOW COMES ISO New England Inc. ("ISO") of One Sullivan Road, Holyoke, Massachusetts 01040, through its attorneys Zalinger Cameron & Lambek, P.C., and hereby requests pursuant to Board Rule 2.209 and V.R.C.P. 24 that the Vermont Public Service Board (the "Board") grant it intervenor status in the above-captioned proceeding. ISO seeks to intervene as a matter of right, or in the alternative seeks permissive intervention.

ISO is a private, non-profit corporation that serves as the independent system operator of New England bulk electricity supply and is responsible for the day-to-day reliable operation of the New England region's bulk electric generation and transmission system. ISO is charged by the Federal Energy Regulatory Commission ("FERC") to plan for and ensure a reliable bulk power system for New England. The proposed Southern Loop Project will have a significant impact on the reliability of the electric system in Vermont and elsewhere in New England. Therefore, ISO has substantial interests,

recognized in 30 V.S.A. § 248(b), that may be adversely affected by the outcome of this proceeding. Further, the proceeding affords the exclusive means by which ISO can protect these interests, especially on a regional basis, which are not otherwise adequately represented by existing parties. ISO's participation will not unduly delay the proceeding or prejudice the interests of existing parties or of the public.

Accordingly, ISO submits that it qualifies for intervention in this proceeding as a matter of right, see Board Rule 2.209(A)(3), and a fortiori for permissive intervention, see 2.209(B).

ISO requests intervenor status in this docket in order to monitor the proceedings by receiving filings and notices from the Board, the applicant and other parties and intervenors. ISO also plans to participate in the proceeding by filing written testimony, presenting expert witnesses and by cross-examining witnesses. ISO believes that its unique expertise in the area of electric generation, transmission, system reliability, and bulk power system planning and operation will assist the Board in resolving issues in this docket and will not impair the orderly conduct of the proceedings.

ISO requests that, in addition to the undersigned, ISO be included on the service list for this docket as follows:


Anthony M. Macleod, Esq.
Whitman Breed Abbott & Morgan
500 West Putnam Avenue
Greenwich, CT 06830-2250

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January 25, 2008

Kevin Flynn, Esq.
Regulatory Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040

Dated at Montpelier, Vermont this 25th day of January, 2008.

ISO NEW ENGLAND INC.

By: 
Bernard D. Lambek, Esq.
Zalinger Cameron & Lambek, P.C.
Its Attorneys
140 Main Street
P.O. Box 1310
Montpelier, Vermont 05602-1310