November 29, 2005

Via Hand Delivery

Honorable Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: ISO New England Inc., Docket No. ER06-_____-000; Additional Interim Amendments to Market Rule 1 for Winter 2005/2006

Dear Ms. Salas:

Pursuant to Section 205 of the Federal Power Act ("FPA"),[1] ISO New England Inc. (the "ISO") submits an original and six (6) copies of this transmittal letter and the additional interim revisions to Market Rule 1[2] attached hereto (collectively, the "Supplemental Winter Package")[3] to aid the ISO in implementing its Winter 2005/2006 Action Plan (as defined below). The Supplemental Winter Package will complement the Market Rule 1 changes (collectively, the "Winter Package") filed by the ISO and the New England Power Pool ("NEPOOL") on October 28, 2005 in Docket No. ER06-89 (the "Winter Package Filing").

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1 *See* 16 U.S.C. § 824(d) (2005).

2 Market Rule 1 is Section III of the ISO New England Inc. Transmission, Markets and Services Tariff (the "Tariff"). Capitalized terms not otherwise defined in this letter have the meanings ascribed thereto in the Tariff.

3 As described further herein, the Supplemental Winter Package consists of a proposed revision to Section III.1.7.6(a) of Market Rule 1, a new Section III.F.2.6.6 of Appendix F to Market Rule 1, and a modification to the new Appendix I of Market Rule 1 filed as part of the Winter Package Filing.

Due to the approaching cold weather season in New England, the ISO is submitting this filing before it has been fully considered within the NEPOOL process. Both of the Market Rule changes in the Supplemental Winter Package, however, were requested within that NEPOOL process, with the understanding that they would be submitted to the Commission for effectiveness simultaneously with the Winter Package. Under these circumstances and to the extent necessary, these changes are being submitted pursuant to the ISO's authority under Section 11.2 of the Participants Agreement, which provides in pertinent part that "in Exigent Circumstances, ISO may unilaterally, upon written notice to the Participants Committee and Individual Participants, file with the Commission pursuant to Section 205, if necessary, and implement a new or amended Market Rule."[4] The NEPOOL Participants Committee is meeting on December 2, 2005, and the agenda for that meeting includes consideration of these changes.[5]

In order to obtain the full benefits of the Supplemental Winter Package for the targeted period, the ISO requests expedited consideration of the Supplemental Winter Package, a shortened comment period of 14 days, and its acceptance with an effective date of December 1, 2005.[6] Consistent with the Winter Package, the Market Rule changes included in the Supplemental Winter Package will automatically "sunset" on March 31, 2006.[7]

Like the Winter Package, the Supplemental Winter Package: (i) is designed to enhance the reliability of New England bulk power system operations during the coming winter, in which natural gas and other generating fuels may be in short supply due to hurricane damage in the

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4 "Exigent Circumstances" are defined as "circumstances such that ISO determines in good faith that (i) failure to immediately implement a new Market Rule, Operating Procedure, Reliability Standard, provision of the Information Policy, Non-TO OATT Provision or Manual would substantially and adversely affect (A) System reliability or security, or (B) the competitiveness or efficiency of the New England Markets, and (ii) invoking the procedures set forth in Section 11.1, 11.3 or 11.4 would not allow for timely redress of ISO's concerns."

5 As noted herein, earlier versions of the Market Rule changes included in the Supplemental Winter Package were presented to the Markets Committee at its October 16 and 17, 2005 meeting. Note that a change to Section III.1.7.6 of Market Rule 1 was already supported through a resolution approved by the NEPOOL Participants at its November 4, 2005 meeting as explained further herein.

6 As discussed in Section V below, the ISO requests waiver of the 60-day notice requirement of 18 C.F.R. § 35.3(a) (2005).

7 As discussed below, Appendix I sets forth the Market Rule 1 text that will be restored effective April 1, 2006.

Gulf of Mexico region; and (ii) will complement Appendix H to Market Rule 1,[8] which also specifies actions to increase system reliability during cold weather conditions.

The ISO emphasizes that it is difficult to predict at this time the amount of natural gas supply that will be available to New England during the coming winter months. Nor is it possible to predict with any reasonable certainty whether extreme cold weather will develop that could operate in tandem with gas or fuel-oil shortages to create electric energy shortages in New England. Nonetheless, based on the facts and projections currently available, it is prudent to take the steps reflected in the Supplemental Winter Package to prepare for contingencies, in the event that they materialize.

I. STANDARD OF REVIEW

The ISO submits these changes to its filed rate pursuant to Section 205 of the FPA, which "gives a utility the right to file rates and terms for services rendered with its assets."[9] Under Section 205, the Commission "plays 'an essentially passive and reactive' role"[10] whereby it "can reject [a filing] only if it finds that the changes proposed by the public utility are not 'just and reasonable.' "[11] 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."[12] The changes proposed herein "need not be the only reasonable methodology, or even the most accurate."[13] As a result, even if an intervenor or the Commission develops an alternative proposal, the Commission must accept the ISO's Section 205 filing if it finds it is just and reasonable.[14]

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8 Revisions to Appendix H ("Operations During Cold Weather Conditions") were filed with the Commission on September 8, 2005 as part of a Partial Settlement Agreement in Docket No. ER05-508-000. The settlement has been certified by the Honorable Herbert Grossman and is awaiting Commission action.

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

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

11 *Id.*

12 *City of Bethany v. FERC*, 727 F.2d 1131, 1136 (D.C. Cir. 1984).

13 *Oxy USA, Inc. v. FERC*, 64 F.3d 679, 692 (D.C. Cir. 1995).

14 *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 *City of Bethany*, 727 F.2d at 1136)).

II. STATEMENT OF ISSUES

The issue presented by this filing is whether the Market Rule 1 changes included in the Supplemental Winter Package are just and reasonable.

III. BACKGROUND: WINTER 2005/2006 ASSESSMENT AND ACTION PLAN, THE WINTER PACKAGE AND THE GENESIS OF THE SUPPLEMENTAL WINTER PACKAGE

Discussion of the Winter 2005/2006 Assessment and Action Plan, and the genesis of the Winter Package, was included as Section III of the Winter Package filing in Docket No. ER06-89. In the interest of avoiding repetition, that discussion is incorporated herein by reference.[15]

Understanding of the impact of the hurricanes on future gas supply is still evolving and the Winter Package and the Supplemental Winter Package of necessity were completed on a highly accelerated basis. By way of background, the ISO presented to NEPOOL on October 13, 2005 the proposed changes to Market Rule 1 that subsequently became the Winter Package. Within six days thereafter, on October 19, 2005, the appropriate NEPOOL Technical Committees considered the Market Rule changes and made recommendations to the Participants Committee. Just two days later, the Participants Committee voted to support each of the elements of the Winter Package. The Winter Package was filed with the Commission on October 28, 2005 in Docket No. ER06-89.

One of the clarifying changes to Section III.F.2.6.2 of Appendix F (relating to "posturing" of generating Resources) included in the Winter Package was supported by the NEPOOL Participants Committee in a resolution that included the following understanding: "it being understood that Resources who are postured as a result of this Rule change are not to be economically harmed because of that posturing and the ISO and the Markets Committee are to recommend as appropriate additional changes that may be necessary to reflect this conceptual agreement for effectiveness coincident with the change in the posturing rules."[16]

The new subsection of Section III.F.2.6 included with the Supplemental Winter Package, *i.e.,* Section III.F.2.6.6, directly responds to this resolution. At its meeting on November 17, 2005, the Markets Committee voted with 74.67 percent in favor to support a slightly different, earlier version of Section III.F.2.6.6 than the one presented herewith. The previous version was developed during the course of the meeting by the ISO and NEPOOL Participants.[17] The version submitted herewith maintains the core ideas presented to the Markets Committee; however,

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15 *See* the Winter Package Filing at 3-6.

16 Attachment 5 to the Winter Package Filing contains information concerning the NEPOOL vote on this resolution (see "Vote 4" in that Attachment).

17 A copy of Section III.F.2.6.6 redlined against the version that was approved by the Markets Committee is attached hereto as Attachment 3.

following such meeting, during internal review of the provision, the ISO discovered that the provision, as approved by the Markets Committee, was inconsistent with the settlements methodology in New England. In light of the need to file the change to Section III.2.6 before December 1, 2005 to (in the words of the NEPOOL resolution) keep the effectiveness of this change “coincident with the change in the posturing rules” and considering that another meeting of the NEPOOL Participants Committee would not occur until December 2, 2005, the ISO is filing this changed version pursuant to Section 11.2 of the Participants Agreement. In the event that the NEPOOL Participants Committee recommends further changes to this provision at its December 2 meeting, the ISO may submit conforming changes to its proposed language.

Also, as indicated in the Winter Package transmittal letter, the ISO has worked with NEPOOL on the development of a new Operating Procedure No. 21 (“OP21”) to provide for periodic surveys of generator fuel availability and associated measures to anticipate and address Emergency Energy situations. OP21 will complement existing ISO New England Operating Procedure No. 4, “Actions During a Capacity Deficiency.” At its November 4, 2005 meeting, the NEPOOL Participants Committee voted with 75.16 percent in favor to support OP21.[18] The resolution adopted by the committee provides:

> Resolved, that the Participants Committee supports the adoption and implementation of Operating Procedure No. 21 as approved by the Reliability Committee and as distributed to the Participants Committee for its November 4, 2005 meeting, together with any changes as were made at the meeting, and any other non-material changes as are approved by the Chair and Vice-Chair of the Reliability Committee on the condition that Section III.1.7.6 of Market Rule 1 is further amended to refer to the interim change in dispatch to posture resources under OP21 and the amendment is subsequently filed with the FERC on or before December 1, 2005 for acceptance or approval.

The change to Section III.1.7.6(a) included in the Supplemental Winter Package is consistent with the November 4 action of the NEPOOL Participants Committee.[19] It was discussed with the NEPOOL Markets Committee and the language was worked out with the Participant representative that made this request as accepted by the Participants Committee.

The use of a sunset date of March 31, 2006 for the Supplemental Winter Package, as in the case of the Winter Package, will allow the ISO and the Market Participants to evaluate afresh

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18 A copy of OP21 is provided for the Commission’s background information as Attachment 4 hereto.

19 A tabulation of the vote regarding OP 21 is attached as Attachment 1 to NEPOOL’s Motion for Leave to Answer and Answer filed in Docket No. ER06-89-000 on November 23, 2005.

whether and to what extent these or other measures should persist beyond this winter and, in particular, whether they are needed for upcoming winter seasons.

IV. DESCRIPTION OF, AND JUSTIFICATION FOR, THE SUPPLEMENTAL WINTER PACKAGE

A. Supplemental Posturing Payments (new Section III.F.2.6.6)

As discussed in Section III, above, in response to concerns expressed in the NEPOOL resolution supporting Market Rule 1 posturing changes about the sufficiency of the compensation for direct costs incurred by a generating Resource when postured, new Section III.F.2.6.6 provides a mechanism for obtaining recovery of such costs.

Section III.F.2.6.6 provides for interim payment of direct costs (excluding incremental financial assurance costs, if any) associated with fuel procured but not delivered as scheduled (e.g., liquidated damages, imbalance charges) imposed by a third party under a fuel contract or a FERC-approved tariff, which would not have been incurred but for the posturing of that Resource by the ISO and can be verified by the ISO ("Direct Posturing Costs"). To receive ISO verification and interim payment, a "Posturing Cost Claim" must be submitted by the Resource within ten business days of the date on which the ISO's Monthly Statement for Non-Hourly Charges is issued for the day on which the posturing occurred, and must include documentation of the asserted Direct Posturing Costs (including a reasonable demonstration by the Market Participant to mitigate its direct costs). The ISO will implement the results of this review in the settlements process.

The ISO will include such verified Direct Posturing Costs, if any, in the Market Participant's next applicable Monthly Statement for Non-Hourly Charges issued no earlier than ten business days after the submitted costs are verified and the Market Participant is notified. A Market Participant may make a Posturing Cost Claim only where it has submitted all relevant fuel contracts (including a demonstration of its reasonableness relative to normal industry practice and/or historical contract terms and conditions for the Resource) and FERC-approved tariffs to the ISO in advance of the posturing event. The ISO will reject any Posturing Cost Claim that is not supported by a previously submitted fuel contract or FERC-approved tariff.

Note that two changes have been made to this provision from the version that was approved by the Markets Committee. The changes to the proposed language are intended to 1) clarify the process by which the dollar amount of a supplemental posturing payment is determined and 2) require that additional information be submitted which will simplify administration of the new provisions. Both changes are described in further detail below.

The changes relating to the determination of dollar amounts are intended to make clear that there will be no netting against other market-related revenues of ISO-verified direct costs for fuel procured but not delivered as scheduled. If a generator is not compensated for these direct costs, the generator may not be made whole for the costs incurred as a result of following the ISO's dispatch instructions during the posturing event. The direct costs being sought are limited to such items as liquidated damages or imbalance charges and the Participant is required under other existing language of this section to mitigate these damages or charges. There are no other incremental revenues through the ISO-administered markets to offset those costs. Therefore, the ISO will credit the generator with the full amount of the verified Direct Posturing Costs in addition to all other market revenues. These costs will be allocated in the same manner as the Posturing Credits under Section III.F.3.1 of Appendix F.

The changes related to the timing and content of information submittals to the ISO are intended to allow the ISO to obtain and process claims promptly and in a manner that conforms to the existing settlement process (timing of submittals) and to have sufficient documentary information to understand and verify the claimed costs in timely fashion (content of submittals).

Thus, new Section III.2.6.6[20] as proposed is just and reasonable because it will permit compensation for costs of enhancing regional reliability during the Winter 2005/2006 period.

B. Clarification Re Posturing (revised Section III.1.7.6(a))

As discussed in Section III, as well, the NEPOOL resolution supporting the adoption of OP21 called for Market Rule 1 to be "amended to refer to the interim change in dispatch to posture resources under OP21" and such amendment to be filed with the Commission on or before December 1, 2005 for acceptance or approval. As the ISO and NEPOOL explained in the Winter Package Filing, Market Rule 1 provides significant authority over the dispatch of Resources, including the posturing thereof, within the New England Control Area.[21] However certain Market Participants have raised concern that another provision of Market Rule 1, Section III.1.7.6, specifically limits the ISO's authority to posture Resources to consideration of factors within the current (Real-Time) and next dispatch day (Day-Ahead). While the ISO does not agree with this interpretation of Market Rule 1, in order to add clarity to Market Rule 1 with respect to any posturing that the ISO engages in to maintain reliability this winter, the ISO, in consultation with Market Participants and NEPOOL counsel, developed language for insertion into Section III.1.7.6, which is described below.

The revision to Section III.1.7.6 is designed to address this input, and provide clarity regarding the ISO's existing posturing authority. In short, the added language paraphrases the paragraph of OP21 that refers to posturing and conforms to the existing language in Market Rule 1 on posturing authority.[22] Specifically the following insertion has been made into Section III.1.7.6:

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[20] A conforming change to the table of contents of Appendix F to Market Rule 1 is also included as part of the Supplemental Winter Package.

[21] *See* Winter Package Filing at 9.

[22] Specifically, Part II.B of OP21 provides: "Step 3: Decrease ISO scheduled generation (posturing) and operate dispatchable pumps out of merit to maintain or improve energy availability by maintaining or improving energy storage levels. This posturing or out-of-merit operation may be necessary for the current day taking into account future day requirements and available fuel resources. (An ISO responsibility)"

> Without any limitation as to the ISO's general authority with respect to scheduling and dispatch, during the period December 1, 2005 through March 31, 2006, ISO scheduling and dispatch may take into account the availability of fuel resources beyond the current day and deviate from the normal security constrained economic Energy dispatch solution for a generating Resource produced by the Technical Software for the purpose of maintaining sufficient Operating Reserve (both on-line and off-line) levels or for the provision of voltage or VAR support in future days, and Resources so postured for future days shall be compensated pursuant to Section III.F.2.6.

Note that this change has been slightly modified from the proposed language that was presented to the Markets Committee for discussion at its November 16, 2005 meeting. The language has been modified to make this provision consistent with the definition of posturing set forth in Section III.F.2.6.

This change is just and reasonable because it provides additional clarity that can help Market Participants better understand measures undertaken by the ISO to protect and enhance energy availability.

C. Modification to Appendix I

As noted above, the ISO proposes that both of the foregoing Market Rule revisions in the Supplemental Winter Package will expire after March 31, 2006. By modifying Appendix I filed with the Winter Package, the ISO has similarly committed to file with the Commission, on or around April 1, 2006, tariff sheets that will undo the two changes to Market Rule 1 associated with the Supplemental Winter Package.

V. REQUESTS FOR SHORTENED COMMENT PERIOD, EXPEDITED CONSIDERATION AND WAIVER

The ISO requests a shortened, 14-day comment period and expedited consideration and acceptance of the Supplemental Winter Package with an effective date of December 1, 2005 in order to address fuel supply issues during the rapidly approaching winter season.[23] While the occasions on which these measures are necessary may be infrequent, the need could occur at any time this winter.

In addition, good cause exists for waiver of the Commission's 60-day notice requirement. The pressing need for the Supplemental Winter Package has been explained above, and the

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[23] In his opening statement at the Commission's October 12, 2005 conference, "Commission Plans to Address Potentially Tight Winter Energy Supplies of Natural Gas," Chairman Kelliher noted that the Commission "stands ready to act quickly on emergency filings to authorize efficient use of existing gas infrastructure."

pressing need for the Winter Package, which the Supplemental Winter Package supports, has been explained in the filing letter in Docket No. ER06-89. Several special meetings of the Markets, Reliability and Participants Committees have been held to consider an appropriate response to the aftermath of Hurricanes Katrina and Rita. The ISO has worked and continues to work closely with NEPOOL in the development of the Winter Package, the Supplemental Winter Package and other related elements of the Winter 2005/2006 Action Plan. Market Participants are well aware of the nature of the Energy shortage concerns of the ISO, and of the elements of the Supplemental Winter Package, and have had the opportunity to provide input on the Supplemental Winter Package.

In furtherance of this request for expedited consideration, the ISO respectfully requests that the Commission require that the deadline for submitting protests and comments with regard to this filing be no longer than 14 days from the date hereof. In addition, the ISO requests that the Commission direct that any responses to comments and protests be submitted within 5 days.

VI. ADDITIONAL SUPPORTING INFORMATION

The following information is provided pursuant to Section 35.13 et seq. of the Code of Federal Regulations:

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

- This transmittal letter;
- revised tariff sheets of Market Rule 1 reflecting the changes proposed by this filing (Attachment 1);
- revised tariff sheets of Market Rule 1 marked to show changes to the currently effective sheets proposed by this filing (Attachment 2);
- a copy of OP 21 (Attachment 3);
- Section III.F.2.6.6 marked to show changes from the version approved by the Markets Committee at its November 17, 2005 meeting (Attachment 4);
- a list of Participants Committee members and alternates to whom a copy of this filing has been sent electronically, along with a list of non-Participant Transmission Customers to which a paper copy of this filing has been sent (Attachment 5); and
- a 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 (Attachment 6).

35.13(b)(2) - The ISO requests waiver of the 60-day notice requirement of 18 C.F.R. § 35.3(a) (2005) and that the Commission accept the Supplemental Winter Package effective as of December 1, 2005.

35.13(b)(3) - Attachment 5 to this transmittal letter includes the names and addresses of all Participants Committee members and alternates, who represent all of the electric utilities rendering or receiving service under the Second Restated NEPOOL Agreement, as well as each of the independent power producers, marketers, brokers, load aggregators, consumer-owned utility systems, demand response providers, merchant transmission providers, and end users that are currently NEPOOL Participants. All Participants Committee members and alternates have been furnished with an electronic copy of this filing, together with this transmittal letter and the accompanying materials. All non-Participant Transmission Customers, also listed in Attachment 5, have also been sent a paper copy of this filing. 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 which comprise the New England Control Area, and to the New England Conference of Public Utility Commissioners, Inc. The names and addresses of these governors and regulatory agencies are shown in Attachment 6. In accordance with Commission rules and practice, there is no need for the entities identified on Attachments 5 and 6 to be included on the Commission's official service list in the captioned proceedings unless such entities become intervenors in this proceeding.

35.13(b)(4) - A description of the rate schedule changes is contained in this transmittal letter and the Attachments referenced herein.

35.13(b)(5) – A statement of the reasons for this filing is discussed in this transmittal letter.

35.13(b)(6) – The ISO's approval of these changes is evidenced by this filing. NEPOOL's consideration of these changes is described in the preceding portions of this transmittal letter.

35.13(b)(7) –The ISO has any 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(c)(1) - The changes, if any, in sales, services and revenues in the markets due to the proposed rule change cannot be reasonably forecasted and no comparison with earlier sales, services, and revenues is possible.

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 Tariff.

35.13(c)(3) - No specifically assignable facilities have been or will be installed or modified in order to implement the Supplemental Winter Package.

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

Maria A. Gulluni*
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
Tel: (413) 535-4000
Fax: (413) 535-4379
E-mail: mgulluni@iso-ne.com

Howard H. Shafferman*
Ballard Spahr Andrews & Ingersoll, LLP
601 13th Street NW
Suite 1000 South
Washington, DC 20005-3807
Tel: (202) 661-2200
Fax: (202 661-2299
E-mail: hhs@ballardspahr.com

*Persons designated for service

Please acknowledge receipt of the foregoing by date-stamping the enclosed extra copies of this filing and returning them to the courier delivering this filing.

Respectfully submitted,

ISO NEW ENGLAND INC.

By:_______________________________

Kathleen A. Carrigan
Senior Vice President and General Counsel
Maria A. Gulluni
Senior Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
(413) 535-4000

By:_______________________________

Howard H. Shafferman
Patrick R. Gillard
Ballard Spahr Andrews & Ingersoll, LLP
601 13th Street, N.W., Suite 1000 South
Washington, D.C. 20005
(202) 661-2200

November 29, 2005

Attachment 1

III.1.7.4 [Reserved.]

III.1.7.5 [Reserved.]

III.1.7.6 Scheduling and Dispatching.

(a) The ISO shall schedule Day-Ahead and schedule and dispatch in Real-Time Resources economically on the basis of least-cost, security-constrained dispatch and the prices and operating characteristics offered by Market Participants. The ISO shall schedule and dispatch sufficient Resources of the Market Participants to serve the New England Markets energy purchase requirements under normal system conditions of the Market Participants and meet the requirements of the New England Control Area for ancillary services provided by such Resources. Without any limitation as to the ISO's general authority with respect to scheduling and dispatch, during the period December 1, 2005 through March 31, 2006, ISO scheduling and dispatch may take into account the availability of fuel resources beyond the current day and deviate from the normal security constrained economic Energy dispatch solution for a generating Resource produced by the Technical Software for the purpose of maintaining sufficient Operating Reserve (both on-line and off-line) levels or for the provision of voltage or VAR support in future days, and Resources so postured for future days shall be compensated pursuant to Section III.F.2.6.

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calculated in accordance with the provisions of Section III.3 of Market Rule 1 and ISO New England Manual 11.

III.F.2.6.5.1 ISO Actions

(1) The ISO retrieves the following information:

(a) list of hours for which Reserve Shortage Condition Pricing Events occurred

(b) list of generating Resources to receive Reserve Shortage Opportunity Cost credits in each hour

(c) Reserve Shortage Opportunity Cost credit amounts by generating Resource

(2) The ISO credits Market Participants for each eligible generating Resource for each hour in which a Reserve Shortage Condition Pricing Event occurs.

III.F.2.6.6 Supplemental Posturing Payments. If a generating Resource incurs direct costs (excluding incremental financial assurance costs, if any) associated with fuel procured but not delivered as scheduled (e.g., liquidated damages, imbalance charges) imposed by a third party under a fuel contract or a FERC-approved tariff, and such direct costs would not have been incurred but for the posturing of that Resource by the ISO ("Direct Posturing Costs"), the Market Participant controlling such a Resource may submit a claim to recover such costs ("Posturing Cost Claim"). A Posturing Cost Claim must be submitted by the Market Participant to the ISO within ten business days of the date on which the ISO's Monthly Statement for Non-Hourly Charges is issued for the day on which the posturing occurred, and must include documentation of the asserted Direct Posturing Costs. Within ten business days from the date the Posturing Cost Claim and supporting documentation (including a reasonable demonstration by the Market Participant to mitigate its direct costs) are received by the ISO, the ISO will review the claim and the supporting documentation to determine the amount, if any, of Direct Posturing Costs it is able to verify, and will notify the Market Participant accordingly. The ISO will include such verified Direct Posturing Costs, if any, in the Market Participant's next applicable Monthly Statement for Non-Hourly Charges issued no earlier than ten business days after the submitted costs are verified and the Market Participant is notified. A Market Participant may make a Posturing Cost Claim only where it has submitted all relevant fuel contracts (including a demonstration of its reasonableness relative to normal industry practice and/or historical contract terms and conditions for the Resource) and FERC-approved tariffs to the ISO in advance of the posturing event. The contract and tariff submittal must include a listing of applicable contract/tariff provisions and an explanation of the application of those provisions in determining the claimed amount of Direct Posturing Costs. The contract and tariff submittal for existing contracts and tariffs must be accomplished no later than December 13, 2005 or, in the case of contracts entered into or tariffs approved after that date, within 10 business days after the contract is executed or the tariff is approved. The ISO will reject any Posturing Cost Claim that is not supported by a previously submitted fuel contract(s) or FERC-approved tariff(s). Verified Direct Posturing Costs paid to claimants will be allocated to Market Participants in the same manner as the Posturing Credits (as defined in Section III.F.3.1 of this appendix).

III.F.3. Charges for Operating Reserve

III.F.3.1 Allocation. The sum of Day-Ahead Operating Reserve Credits for the Day-Ahead Energy Market is allocated and charged to Market Participants in proportion to the daily sum of their Day-Ahead Load Obligations. The sum of Real-Time Operating Reserve including External Resources, in MWhs during the Operating Day; and (iii) deviations from the Day-Ahead Energy Market for External Transaction purchases in MWhs during the Operating Day ~~except that positive Real-Time Generation Obligation Deviation at External Nodes associated with Emergency energy purchases are not included in this calculation~~. As provided for in the ISO New England Manuals, generation Resources shall have a 5% or 5 MWh threshold when determining such deviations."

Section III.F.3.2.15(f)

"the sum of the hourly absolute values for the Operating Day of the Participant's Real-Time Generation Obligation Deviation at External Nodes ~~except that positive Real-Time Generation Obligation Deviation at External Nodes associated with Emergency energy purchases are not included in this calculation~~

[Note: External Transaction purchases curtailed by the ISO are omitted from this calculation], **plus**"

III.I.1.3 Posturing Changes

Section III.1.7.6(a)

"The ISO shall schedule Day-Ahead and schedule and dispatch in Real-Time Resources economically on the basis of least-cost, security-constrained dispatch and the prices and operating characteristics offered by Market Participants. The ISO shall schedule and dispatch sufficient Resources of the Market Participants to serve the New England Markets energy purchase requirements under normal system conditions of the Market Participants and meet the requirements of the New England Control Area for ancillary services provided by such Resources. ~~Without any limitation as to the ISO's general authority with respect to scheduling and dispatch, during the period December 1, 2005 through March 31, 2006, ISO scheduling and dispatch may take into account the availability of fuel resources beyond the current day and deviate from the normal security constrained economic Energy dispatch solution for a generating Resource produced by the Technical Software for the purpose of maintaining sufficient Operating Reserve (both on-line and off-line) levels or for the provision of voltage or VAR support in future days, and Resources so postured for future days shall be compensated pursuant to Section III.F.2.6.~~"

Section III.F.2.6.2(a)

"*Generating Resources Without Daily Energy Restrictions.* For generating Resources without daily energy restrictions ~~(generating Resources that are not Limited Energy Resources)~~, the posturing credit for each hour of reduced or suspended operation is:"

[remainder of subsection unchanged]

Section III.F.2.6.2(b)

"*Generating Resources With Daily Energy Restrictions.* For generating Resources with daily energy restrictions ~~(generating Resources that are Limited Energy Resources)~~, a credit is determined based on an estimate of the daily net opportunity cost in the energy market. This daily net amount shall not be negative. The posturing credit is:"

[remainder of subsection unchanged]

Section III.F.2.6.6, regarding Supplemental Posturing Payments, will be removed in its entirety.

Section III.F.3.1

"The sum of Day-Ahead Operating Reserve Credits for the Day-Ahead Energy Market is allocated and charged to Market Participants in proportion to the daily sum of their Day-Ahead Load Obligations. The sum of Real-Time Operating Reserve Credits (including posturing Credits) including those associated with Synchronous Condensers for the Real-Time Energy Market is allocated and charged to Market Participants in proportion to their daily sum of their Real-Time Load Obligation Deviations (excluding any difference between Dispatchable Load Demand Bids that are cleared in the Day-Ahead Energy Market and revenue quality meter readings for Dispatchable Load pumps for the Operating Day that result from operation in accordance with the ISO 's instructions), generation deviations from Day-Ahead amounts and the daily sum of the generation deviations from the greater of the hourly aggregate Desired Dispatch Point or the Resource's Economic Minimum Limit. ~~Real-Time Operating Reserve Credits associated with the posturing of facilities are allocated and charged to Market Participants in proportion to the daily sum of their Real-Time Load Obligations, excluding Real-Time Load Obligation associated with postured Dispatchable Load pump operation that is not Self-Scheduled or in-merit.~~"

[remainder of section unchanged]

III.I.1.4 Demand Response Winter Supplemental Program

Section III.E.9, instituting the Demand Response Winter Supplemental Program for the period December 1, 2005 through March 31, 2006, will be removed in its entirety.

III.I.1.5 Winter 2005/2006 Sunset Provisions

This Appendix I, specifying which provisions of Market Rule 1 and its Appendices will sunset on April 1, 2006, will be removed in its entirety.

Attachment 2

III.1.7.4 [Reserved.]

III.1.7.5 [Reserved.]

III.1.7.6 Scheduling and Dispatching.

(a) The ISO shall schedule Day-Ahead and schedule and dispatch in Real-Time Resources economically on the basis of least-cost, security-constrained dispatch and the prices and operating characteristics offered by Market Participants. The ISO shall schedule and dispatch sufficient Resources of the Market Participants to serve the New England Markets energy purchase requirements under normal system conditions of the Market Participants and meet the requirements of the New England Control Area for ancillary services provided by such Resources. Without any limitation as to the ISO's general authority with respect to scheduling and dispatch, during the period December 1, 2005 through March 31, 2006, ISO scheduling and dispatch may take into account the availability of fuel resources beyond the current day and deviate from the normal security constrained economic Energy dispatch solution for a generating Resource produced by the Technical Software for the purpose of maintaining sufficient Operating Reserve (both on-line and off-line) levels or for the provision of voltage or VAR support in future days, and Resources so postured for future days shall be compensated pursuant to Section III.F.2.6.

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calculated in accordance with the provisions of Section III.3 of Market Rule 1 and ISO New England Manual 11.

III.F.2.6.5.1 ISO Actions

(1) The ISO retrieves the following information:

(a) list of hours for which Reserve Shortage Condition Pricing Events occurred

(b) list of generating Resources to receive Reserve Shortage Opportunity Cost credits in each hour

(c) Reserve Shortage Opportunity Cost credit amounts by generating Resource

(2) The ISO credits Market Participants for each eligible generating Resource for each hour in which a Reserve Shortage Condition Pricing Event occurs.

III.F.2.6.6 Supplemental Posturing Payments. If a generating Resource incurs direct costs (excluding incremental financial assurance costs, if any) associated with fuel procured but not delivered as scheduled (e.g., liquidated damages, imbalance charges) imposed by a third party under a fuel contract or a FERC-approved tariff, and such direct costs would not have been incurred but for the posturing of that Resource by the ISO ("Direct Posturing Costs"), the Market Participant controlling such a Resource may submit a claim to recover such costs ("Posturing Cost Claim"). A Posturing Cost Claim must be submitted by the Market Participant

~~**III.F.3. Charges for Operating Reserve**~~

~~**III.F.3.1 Allocation**. The sum of Day-Ahead Operating Reserve Credits for the Day-Ahead Energy Market is allocated and charged to Market Participants in proportion to the daily sum of their Day-Ahead Load Obligations. The sum of Real-Time Operating Reserve~~

to the ISO within ten business days of the date on which the ISO's Monthly Statement for Non-Hourly Charges is issued for the day on which the posturing occurred, and must include documentation of the asserted Direct Posturing Costs. Within ten business days from the date the Posturing Cost Claim and supporting documentation (including a reasonable demonstration by the Market Participant to mitigate its direct costs) are received by the ISO, the ISO will review the claim and the supporting documentation to determine the amount, if any, of Direct Posturing Costs it is able to verify, and will notify the Market Participant accordingly. The ISO will include such verified Direct Posturing Costs, if any, in the Market Participant's next applicable Monthly Statement for Non-Hourly Charges issued no earlier than ten business days after the submitted costs are verified and the Market Participant is notified. A Market Participant may make a Posturing Cost Claim only where it has submitted all relevant fuel contracts (including a demonstration of its reasonableness relative to normal industry practice and/or historical contract terms and conditions for the Resource) and FERC-approved tariffs to the ISO in advance of the posturing event. The contract and tariff submittal must include a listing of applicable contract/tariff provisions and an explanation of the application of those provisions in determining the claimed amount of Direct Posturing Costs. The contract and tariff submittal for existing contracts and tariffs must be accomplished no later than December 13, 2005 or, in the case of contracts entered into or tariffs approved after that date, within 10 business days after the contract is executed or the tariff is approved. The ISO will reject any Posturing Cost Claim that is not supported by a previously submitted fuel contract(s) or FERC-approved tariff(s). Verified Direct Posturing Costs paid to claimants will be allocated to Market Participants in the same manner as the Posturing Credits (as defined in Section III.F.3.1 of this appendix).

III.F.3. Charges for Operating Reserve

III.F.3.1 Allocation. The sum of Day-Ahead Operating Reserve Credits for the Day-Ahead Energy Market is allocated and charged to Market Participants in proportion to the daily sum of their Day-Ahead Load Obligations. The sum of Real-Time Operating Reserve including External Resources, in MWhs during the Operating Day; and (iii) deviations from the Day-Ahead Energy Market for External Transaction purchases in MWhs during the Operating Day ~~except that positive Real-Time Generation Obligation Deviation at External Nodes associated with Emergency energy purchases are not included in this calculation~~. As provided for in the ISO New England Manuals, generation Resources shall have a 5% or 5 MWh threshold when determining such deviations."

Section III.F.3.2.15(f)

"the sum of the hourly absolute values for the Operating Day of the Participant's Real-Time Generation Obligation Deviation at External Nodes ~~except that positive Real-Time Generation Obligation Deviation at External Nodes associated with Emergency energy purchases are not included in this calculation~~

[Note: External Transaction purchases curtailed by the ISO are omitted from this calculation], **plus**"

III.I.1.3 Posturing Changes

Section III.1.7.6(a)

"The ISO shall schedule Day-Ahead and schedule and dispatch in Real-Time Resources economically on the basis of least-cost, security-constrained dispatch and the prices and operating characteristics offered by Market Participants. The ISO shall schedule and dispatch sufficient Resources of the Market Participants to serve the New England Markets energy purchase requirements under normal system conditions of the Market Participants and meet the requirements of the New England Control Area for ancillary services provided by such Resources. ~~Without any limitation as to the ISO's general authority with respect to scheduling and dispatch, during the period December 1, 2005 through March 31, 2006, ISO scheduling and dispatch may take into account the availability of fuel resources beyond the current day and deviate from the normal security constrained economic Energy dispatch solution for a generating Resource produced by the Technical Software for the purpose of maintaining sufficient Operating Reserve (both on-line and off-line) levels or for the provision of voltage or VAR support in future days, and Resources so postured for future days shall be compensated pursuant to Section III.F.2.6.~~"

Section III.F.2.6.2(a)

"*Generating Resources Without Daily Energy Restrictions.* For generating Resources without daily energy restrictions ~~(generating Resources that are not Limited Energy Resources)~~, the posturing credit for each hour of reduced or suspended operation is:"

[remainder of subsection unchanged]

Section III.F.2.6.2(b)

"*Generating Resources With Daily Energy Restrictions.* For generating Resources with daily energy restrictions ~~(generating Resources that are Limited Energy Resources)~~, a credit is determined based on an estimate of the daily net opportunity cost in the energy market. This daily net amount shall not be negative. The posturing credit is:"

[remainder of subsection unchanged]

Section III.F.2.6.6, regarding Supplemental Posturing Payments, will be removed in its entirety.

Section III.F.3.1

"The sum of Day-Ahead Operating Reserve Credits for the Day-Ahead Energy Market is allocated and charged to Market Participants in proportion to the daily sum of their Day-Ahead Load Obligations. The sum of Real-Time Operating Reserve Credits (including posturing Credits) including those associated with Synchronous Condensers for the Real-Time Energy Market is allocated and charged to Market Participants in proportion to their daily sum of their Real-Time Load Obligation Deviations (excluding any difference between Dispatchable Load Demand Bids that are cleared in the Day-Ahead Energy Market and revenue quality meter readings for Dispatchable Load pumps for the Operating Day that result from operation in accordance with the ISO 's instructions), generation deviations from Day-Ahead amounts and the daily sum of the generation deviations from the greater of the hourly aggregate Desired Dispatch Point or the Resource's Economic Minimum Limit. ~~Real-Time Operating Reserve Credits associated with the posturing of facilities are allocated and charged to Market Participants in proportion to the daily sum of their Real-Time Load Obligations, excluding Real-Time Load Obligation associated with postured Dispatchable Load pump operation that is not Self-Scheduled or in-merit.~~"

[remainder of section unchanged]

III.I.1.4 Demand Response Winter Supplemental Program

Section III.E.9, instituting the Demand Response Winter Supplemental Program for the period December 1, 2005 through March 31, 2006, will be removed in its entirety.

III.I.1.5 Winter 2005/2006 Sunset Provisions

This Appendix I, specifying which provisions of Market Rule 1 and its Appendices will sunset on April 1, 2006, will be removed in its entirety.

Attachment 3

ISO New England Operating Procedure No. 21
Action During An Energy Emergency

Effective Date: November 4, 2005

REFERENCES:	NERC Standard EOP-002 - Capacity and Energy Emergencies NPCC Emergency Operation Criteria A-3 NPCC Operating Reserve Criteria A-6 NPCC Procedures During Abnormal Operating Conditions C20 ISO New England Operating Procedure No. 4 – Action During a Capacity Deficiency (OP4) ISO New England Operating Procedure No. 5 - Generation Maintenance and Outage Scheduling (OP5) ISO New England Operating Procedure No. 7 - Action in an Emergency (OP 7) ISO New England Operating Procedure No. 8- Operating Reserve and Regulation (OP 8) ISO New England Operating Procedure No. 9 – Scheduling and Dispatch of External Transactions (OP 9) ISO New England Operating Procedure No. 10 Emergency Incident and Disturbance Notifications (OP10) ISO New England Operating Procedure No. 14 – Technical Requirements for Generation, Dispatchable and Interruptible Load (OP 14) Master/Local Control Center Procedure No. 2 - Abnormal Conditions Alert (M/LCC 2) ISO New England, FERC Electric Tariff No. 3, Section III - Market Rule 1 ISO New England Manuals ISO New England Inc., FERC Electric Tariff No. 3, Attachment D - ISO New England Information Policy

Local Control Center Instructions:

CONVEX:	TBD
MAINE:	TBD
NEW HAMPSHIRE:	TBD
REMVEC:	TBD
VELCO:	TBD

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Appendix B – Fuel Survey Form – Weekly/Daily Updates

PART I - INTRODUCTION

This Procedure establishes criteria and guides for actions in anticipation of and during energy emergencies as directed by the ISO and as implemented by the ISO and the Local Control Centers. Energy emergencies may occur as a result of sustained, wide scale shortages in fuel availability to the region's generation resources. Such shortages of fuel availability may come in many forms, including, but not limited to, severe drought, interruption of natural gas supplies, or shortages of oil or coal. If the impact of the energy shortage is projected to result in the loss of operable generating capability that would prevent the ISO from meeting system load and ten minute operating reserve requirements, such conditions will be considered an "Energy Emergency." In response to a projected Energy Emergency, the ISO must take action to dispatch the system in such a way as to preserve stored energy resources in the region to avoid wide scale loss of operable generating capability due to energy shortages.

Energy Emergencies are envisioned to last longer than capacity deficiencies, which are managed through ISO Operating Procedure No. 4 – Actions During a Capacity Deficiency and, under extreme circumstances, through ISO Operating Procedure No. 7 – Actions in an Emergency. Operable capability deficiencies are typically experienced at seasonal peak load conditions or upon the occurrence of other emergent system conditions and tend to last for a few hours per event. Because energy shortages may impact the region's ability to fully meet system load and ten minute operating reserve requirements for weeks or months at a time, actions may need to be taken in advance of a projected Energy Emergency to manage and preserve adequate energy supplies for the region. Unless actions are taken to address projected Energy Emergencies, shortages of fuel availability may lead to significant losses of operating capacity.

The objectives in establishing this Procedure are:

1. To collect energy availability information from Market Participants to support the determination of energy adequacy for the region's electric power requirements;

2. To raise the awareness of New England consumers, Market Participants, New England State officials, regional and national regulators, and regional and national reliability organizations of potential energy shortages that may be faced by the region; and,

3. To allow for timely implementation of relief available in actions of ISO Operating Procedure No. 4 – Actions During a Capacity Deficiency or through implementation of load shedding through ISO Operating Procedure No. 7 – Action in an Emergency to address future capacity shortages expected as a result of an Energy Emergency.

PART II - PROCEDURE

A. DATA COLLECTION AND EVALUATIONS

The ISO will conduct fuel surveys for the Winter Peak Load Season (December – February). The initial fuel survey will use the comprehensive fuel survey form in Appendix A of this procedure. Subsequent surveys performed on a weekly or daily basis will use the abbreviated fuel survey form found in Appendix B of this procedure. The ISO shall not modify the availability of any generating resource based on the fuel survey information without confirming that status with the generator owner.

When in effect, these surveys will be performed at least every week, and may be performed on a daily basis under severe Energy Emergency conditions (*i.e.,* when advanced Steps of this Procedure are forecasted to be required), for the duration of the period considered to have a potential Energy Emergency. Any information collected in the surveys that is not publicly available information will be considered Confidential Information and handled by the ISO in accordance with the ISO Information Policy.

In conjunction with the fuel surveys, the ISO will perform an assessment of system generation requirement by fuel type to estimate the amount of generation required to serve expected New England system load requirements. This assessment will be used to better quantify fuel inventory impacts and highlight potential supplemental fuel needs. These studies will normally be updated on a weekly basis and will cover up to an eight-week operating horizon, concentrating on the first four-week period as the most critical for use in identifying the possible need for mitigating measures to address operable generating capacity shortfalls resulting in an Energy Emergency. These studies will use currently available information for generator availability and operating characteristics, including current maintenance schedules and any known forced outages. Under severe energy shortage conditions, this analysis will be updated daily to provide necessary guidance to the ISO for implementation of all necessary dispatch actions to address the Energy Emergency. The ISO will indicate the forecasted need for OP21 actions on the seven-day load and capacity forecast posted on the ISO website. http://www.iso-ne.com/sys_ops/op_frcstng/7day_frcst/index.html

B. IMPLEMENTATION

Whenever the above analysis indicates that energy shortage conditions are forecasted to result in an Energy Emergency within the upcoming seven-day load and capacity forecast study horizon, the ISO will implement Step 1 and all other necessary Steps in this Procedure. Under potentially severe and sustained energy shortage conditions, it may be necessary to implement Steps in this Procedure for periods greater than the normal seven-day load and capacity forecast horizon. Use of these Steps, for periods outside of the seven-day load and capacity forecast horizon, will be approved by the ISO Chief Operating Officer or his/her designee.

If the ISO has determined that the region is faced with an Energy Emergency and implementation of Part II B. of this Procedure is required, one or more of the following Steps beyond Step 1 will be implemented in any order to address the Energy Emergency conditions. The ISO shall report on its website its reason for declaring an Energy Emergency and shall update the Participants Committee on a monthly basis on the implementation of OP21 and its reasons for declaring an Energy Emergency. To the extent that a Step has more than one possible action, any or all of those actions may be implemented as part of that Step:

Step 1:

Alert the Local Control Centers and Market Participants promptly any time implementation of Part II.B. of this Procedure is warranted. Alert the surrounding Control Areas and coordinate with these Areas in accordance with NPCC Document A6 - NPCC Operating Reserve Criteria, and NPCC Document C20 - Procedures During Abnormal Operating Conditions. The alerts will be issued in accordance with Master/Local Control Center Procedure No. 2 – "Abnormal Conditions Alert" (M/LCC 2). **(An ISO responsibility)**

Step 2:

Request that dual-fuel units, that are scheduled to operate, voluntarily switch to operation on the fuel source that is not in short supply. **(An ISO responsibility)**

Step 3:

Decrease ISO scheduled generation (posturing) and operate dispatchable pumps out of merit to maintain or improve energy availability by maintaining or improving energy storage levels. This posturing or out-of-merit operation may be necessary for the current day taking into account future day requirements and available fuel resources. **(An ISO responsibility)**

Step 4:

Implement specific relief measures available through Actions of ISO Operating Procedure No. 4 – Actions During a Capacity Deficiency, excluding Action 16. **(An ISO and LCC responsibility)**

If the actions in Steps 1 – 4 above do not result in the necessary relief from the forecasted regional Energy Emergency, the following Steps may be taken as approved by the ISO Chief Operating Officer or his/her designee:

Step 5:

Implement Action 16 of Operating Procedure No. 4 – Action During a Capacity Deficiency: Request New England State Governors to reinforce appeals for voluntary load curtailment and the declaration of a Power Warning, as initiated in Action 15 of OP4.

.

Under extreme conditions, the ISO will seek relief through load shedding actions available through implementation of ISO Operating Procedure No. 7 – Action in an Emergency. **(An ISO responsibility and LCC)**

Cancellation of This Procedure

Typically, the Steps taken under this Procedure will be cancelled once the Energy Emergency no longer exists and forecasts indicate no near-term recurrence.

Reports

The ISO will file all required reports in accordance with ISO New England Operating Procedure No. 10 - Emergency Incident and Disturbance Notifications**.** The ISO will notify Market Participants and regional state officials on the implementation and cancellation of steps under this procedure. Within ninety (90) days after OP21 terminates the ISO shall issue a report assessing the effectiveness of OP21 in addressing actual and potential Energy Emergencies in New England during the Winter 2005/2006 period.

Effective Date and Term

This OP21 shall go into effect on November 4, 2005 and shall remain in effect through March 31, 2006, after which date it shall terminate automatically.

Document History

Rev. No.	**Date**	**Reason**
Rev 0	11/04/2005	Original Version for Winter 2005/2006

Appendix A
Fuel Survey Questionnaire

UNITS & FUEL TYPES:

1.0 Please indicate the name, Asset ID, and current Seasonal Claimed Capability (Winter & Summer) ratings of your individual generating units:

Unit Name	Asset ID	Winter SCC	Summer SCC

2.0 By individual unit, please indicate (if applicable) the start-up, primary and secondary fuel types/sources.

Unit Name	Start-Up Fuel	Primary Fuel	Secondary Fuel

Please answer the questions under the sections below (as applicable) for the start-up, primary and secondary fuel types/sources specified above for each individual unit.

3.0 Is your unit/station permitted for dual fuel operation? If yes, please answer the additional questions under the Dual Fuel section.

4.0 Please identify any emissions or other permit constraints that may impact operations for each individual unit:

COAL:

5.0 What is your coal storage capacity (on-site & off-site in tons and MWhr)?

5.1 Please describe all coal storage constraints, including bunkering that is already in use or could be expanded to support extended operation:

5.2 What is the typical coal inventory maintained on site/off-site in MWhr? Tons?

4.2.1 What is your current coal inventory in MWhr? Tons?

5.3 Assuming full storage capacity, and without refill, how long (MWhr & clock time) could your unit(s) sustain:

5.3.1 Maximum output:

5.3.2 Half-load output:

5.3.3 Minimum output:

6.0 How is coal delivered to the facility (rail or barge)?

6.1 Please describe all fuel receiving constraints:

6.2 What arrangements does the facility have with its fuel suppliers?
_____ Spot delivery based on current market availability
_____ Contracted minimum delivery volumes. If yes, please specify the terms.
_____ Long-term contracts. If yes, please specify the terms.
_____ Other (specify below)
____

6.3 Are backup suppliers for fuel refill contracted? Please specify.
____

7.0 What are your projected inventories/deliveries for the next four weeks in MWhr? Tons? For weeks five through eight?

FUEL OIL:

9.0 What is your on-site fuel oil storage capacity (in gallons or barrels and MWhr)?

9.1 Please describe all fuel oil storage constraints, including tankage/bunkering that is already in use or could be expanded to support extended fuel oil operation:

9.2 What is the typical fuel oil inventory maintained on site in MWhr? Bbls/Gallons?

9.2.1 What is your current oil inventory in MWhr? Bbls/Gallons?

9.3 Assuming full storage capacity, and without refill, how long (MWhr & clock time) could your unit(s) sustain:

9.3.1 Maximum output:

9.3.2 Half-load output:

9.3.3 Minimum output:

10.0 How is fuel oil delivered to the facility (pipeline, truck, barge, rail)?

10.1 Please describe all fuel receiving constraints:

10.2 What arrangements does the facility have with fuel suppliers?
_____ Spot delivery based on current market availability
_____ Contracted minimum delivery volumes. If yes, please specify terms.
_____ Long-term contracts. If yes, please specify terms.
_____ Other

10.3 Are backup suppliers for fuel refill contracted?

11.0 What are your projected inventories/deliveries for the next four weeks in MWhr? Bbls/Gallons? For weeks five through eight?

12 Is your oil-fired unit/station permitted for dual fuel operation?
If yes, please answer the additional questions under the Dual Fuel section.

NATURAL GAS:

13.0 Please describe your station's natural gas supply and delivery contract information:

13.1 Please describe your station's natural gas supply contract(s):
(i.e. firm, interruptible, storage, combination, etc.)

13.2 Please describe your station's natural gas transportation contract(s):
(i.e. firm, interruptible, combination, etc.)

13.3 Please identify your station's natural gas delivery point:
(i.e. pipeline or LDC meter ID (location) and operational capacity (Dth))

14.0 Is your gas-fired unit/station permitted for dual fuel operation? If yes, please answer the additional questions under the Dual fuel section.

DUAL FUEL:

15.0 Is your unit/station capable of dual fuel operation?
If no, please answer question 18.0.
If yes, is the equipment in place to burn the secondary fuel (typically oil)?

16.0 Please identify any emissions or other permit constraints that may impact dual fuel operation this winter. :

17.0 What length of time is typically required to switch from fuel oil to gas or gas to fuel oil?

17.1 Please indicate the historical success rate for fuel switching:
(i.e. number of time fuel switching was attempted and number of times that the switching process resulted in a forced or unanticipated outage/reduction of the unit/station.)

18.0 What is required to achieve dual fuel capability?

18.1 Equipment requirements?

18.2 Fuel storage requirements?

18.3 Time and outage duration required for installation and testing?

18.4 Miscellaneous requirements?

{End Fuel Survey Questionnaire}

Attachment 4

[redlined versus MC-supported 11/17/05 version]

III.F.2.6.6 Supplemental Posturing Payments

If a generating Resource incurs direct costs (excluding incremental financial assurance costs, if any) associated with fuel procured but not delivered as scheduled (e.g., liquidated damages, imbalance charges) imposed by a third party under a fuel contract or a FERC-approved tariff, and such direct costs would not have been incurred but for the posturing of that Resource by the ISO ~~and those direct costs are in excess of all applicable revenues including compensation pursuant to Appendix F to Market Rule 1~~ ("~~Net Excess~~ Direct Posturing Costs"), the Market Participant controlling such a Resource may submit a claim to recover such costs ("Posturing Cost Claim"). A Posturing Cost Claim must be submitted by the Market Participant to the ISO within ten business days of the date on which the ISO's Monthly ~~Services Customer Bill~~ Statement for Non-Hourly Charges is issued for the day on which the posturing occurred, and must include documentation of the asserted ~~Net Excess~~ Direct Posturing Costs. Within ten business days from the date the Posturing Cost Claim and supporting documentation (including a reasonable demonstration by the Market Participant to mitigate its direct costs) are received by the ISO, the ISO will review the claim and the supporting documentation to determine the amount, if any, of ~~Net Excess~~ Direct Posturing Costs it is able to verify, and will notify the Market Participant accordingly. The ISO will include such verified ~~Net Excess~~ Direct Posturing Costs, if any, ~~in the calculation of the Posturing Credit (as defined in Appendix F)~~ in the Market Participant's next applicable Monthly Statement for Non-Hourly Charges issued~~Services bill~~ no earlier than ten business days after the submitted costs are verified and the Market Participant is notified~~, subject to refund as discussed below~~. A Market Participant may make a Posturing Cost Claim only where it has submitted all relevant fuel contracts (including a demonstration of its reasonableness relative to normal industry practice and/or historical contract terms and conditions for the Resource) and FERC-approved tariffs to the ISO in advance of the posturing event. The contract and tariff submittal must include a listing of applicable contract/tariff provisions and an explanation of the application of those provisions in determining the claimed amount of Direct Posturing Costs. The contract and tariff submittal for existing contracts and tariffs must be accomplished no later than December 13, 2005 or, in the case of contracts entered into or tariffs approved after that date, within 10 business days after the contract is executed or the tariff is approved. The ISO will reject any Posturing Cost Claim that is not supported by a previously submitted fuel contract(s) or FERC-approved tariff(s). Verified Direct Postuing Costs paid to claimants will be allocated to Market Participants in the same manner as the Posturing Credits (as defined in Section III.F.3.1 of this appendix).

Attachment 5

NEPOOL Participants Committee
Members and Alternates

October 26, 2005

Carl Peterson
AIG Energy, Inc.
One Greenwich Plaza
Greenwich, CT 06830

Hermant Jain
Director, Electric Operations
Amerada Hess
One Hess Plaza
Woodbridge, NJ 07095

Blas Hernandez (Alt)
Manager, Electric Trading
Amerada Hess
One Hess Plaza
Woodbridge, NJ 07095

Robert W. Bradish
American Electric Power Service Corporation
155 West Nationwide Blvd.
Suite 500
Columbus, OH 43215

Dorothy J. Capra
Director Regulatory Affairs
ANP Funding I, LLC
62 Forest Street, Suite 102
Marlborough, MA 01752

William Henson (Alt)
Director, Power Marketing
ANP Funding I, LLC
62 Forest Street, Suite 102
Marlborough, MA 01752

Stanley W. Herriott
Manager
Ashburnham Municipal Light Plant
78 Central Street
P.O. Box 823
Ashburnham, MA 01430

Tim Peet (Alt)
Ashburnham Municipal Light Plant
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Robert Ruddock
Executive Vice President
Associated Industries of Massachusetts
Suite 1300
222 Berkeley Street
Boston, MA 02117

Angela M. O'Connor (Alt)
Vice President of Energy Programs
Associated Industries of Massachusetts
13th Floor
222 Berkeley Street
Boston, MA 02117

Jeffrey A. Jones
Manager-Legal & Regulatory Services
Bangor Hydro-Electric Company
33 State Street
P.O. Box 932
Bangor, ME 04402-0932

Gregory Hines (Alt)
Director of Business Services
Bangor Hydro-Electric Company
33 State Street
P.O. Box 932
Bangor, ME 04402-0932

Edward Wong
Bank of America
9 West 57th Street
New York, NY 10019

Jonathan Tucker (Alt)
Bank of America
9 West 57th Street
New York, NY 10019

David Allen
Barclays Bank
200 Park Avenue
5th Floor
New York, NY 10166

Maria Valdes (Alt)
Barclays Bank
200 Park Avenue
5th Floor
New York, NY 10166

Timothy L. McCarthy
Manager
Belmont Municipal Light Department
450 Concord Avenue
Belmont, MA 02478

Tim Peet (Alt)
Belmont Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Chad N Kopp
Black Oak Capital
106 West 76th Street, Suite 3A
New York, NY 10023

Thomas W. Jens (Alt)
Black Oak Capital
106 West 76th Street, Suite 3A
New York, NY 10023

Serge Picard
Trader
Black Oak Energy, LLC
1401 Washington Blvd.
Suite 305
Hoboken, NJ 07030

Dave Holder (Alt)
Trader
Black Oak Energy, LLC
1401 Washington Blvd.
Suite 305
Hoboken, NJ 07030

Robert A. Weishaar, Jr.
Counsel
BOC Energy Services, Inc.
c/o McNees Wallace & Nurick LLC
777 North Capitol Street, N.E.
Suite 401
Washington, DC 20002

Larry Stalica (Alt)
Vice President
BOC Energy Services, Inc.
575 Mountain Avenue
Murray Hill, NJ 07974

Nathan Hebel
Boralex Stratton Energy Inc.
770 Sherebrooke Street West
Montreal, Quebec H3A 1G1

Richard Cloutier (Alt)
Boralex Stratton Energy Inc.
770 Sherebrooke Street West
Montreal, Quebec H3A 1G1

James Daly
Director, Electric and Gas Energy Supply
Boston Edison Company
c/o NSTAR
One NSTAR Way
Mail Stop NE 220
Westwood, MA 02090

Robert P. Clarke (Alt)
Director, Energy Planning and Supply
Boston Edison Company
c/o NSTAR
800 Boylston Street (P1704)
Boston, MA 02199-8001

Paul Hamilton
Director of Operations
Boston Generating, LLC
Schrafft Center Suite 605
529 Main Street
Charlestown, MA 02129

William Fowler (Alt)
Boston Generating , LLC
c/o Sigma Consulting Company
20 Main Street
Acton, MA 01720

H. Bradford White, Jr.
Manager
Boylston Municipal Light Department
Paul X. Tivnan Road
P.O. Box 753
Boylston, MA 01505-0753

Tim Peet (Alt)
Boylston Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Jason Stever
BP Energy Company
501 WestLake Park Boulevard
Houston, TX 77079

Mary Ann Swick
Credit Risk Manager
BP Energy Company
501 Westlake Park Blvd, 4th floor
Houston, TX 77079

Kenneth E. Stone
Energy Service Manager
Braintree Electric Light Department
150 Potter Road
Braintree, MA 02184-3598

John P. Coyle (Alt)
Braintree Electric Light Department
c/o Duncan & Allen
1575 Eye Street, NW
Washington, DC 20005-1175

Paul Jutras
Brascan Energy Marketing, Inc.
2 Montreal Road West
Masson-Angers, Quebec, J8M 1K6
CANADA

Richard St. Jean (Alt)
Brascan Energy Marketing, Inc.
2 Montreal Road West
Masson-Angers, Quebec, J8M 1K6
CANADA

Barbara L. Grimes
General Manager
Burlington Electric Department
585 Pine Street
Burlington, VT 05401

John Irving (Alt)
Manager of Power Supply
Burlington Electric Department
585 Pine Street
Burlington, VT 05401

Thomas W. Kaslow
Calpine Energy Services, LP
c/o Calpine Eastern Corporation
Lewis Wharf, 3rd Floor
Boston, MA 02110

Jeff Woodall (Alt)
Lead Scheduler
Calpine Energy Services, LP
700 Louisiana Ave., Ste. 2700
Houston, TX 77002

Craig Gontkovic
Manager of General Partner
CAM Energy Products, LP
One North End Avenue
Suite 1101
New York, NY 10282

Allen Wolf (Alt)
Manager of General Partner
CAM Energy Products, LP
One North End Avenue
Suite 1101
New York, NY 10282

Margaret Downey
Asst. County Administrator
Cape Light Compact, The
3195 Main Street
P.O. Box 427
Barnstable, MA 02630

Joseph A. Soares (Alt)
Cape Light Compact, The
3195 Main Street
P.O. Box 427
Barnstable, MA 02630

Bret S. Jones
Cargill Power Markets, LLC
12700 Whitewater Drive
Minnetonka, MN 55343-9439

Eric N. Stinneford
Manager, Power Contracts Administration
Central Maine Power Company
41 Anthony Avenue
Augusta, ME 04330

Hariph M. Smith (Alt)
Central Maine Power Company
41 Anthony Avenue
Augusta, ME 04330

Jeffrey R. Cady
Power Resource Manager
Chicopee Municipal Lighting Plant
725 Front Street
P.O. Box 405
Chicopee, MA 01021-0405

Brian Forshaw
Chicopee Municipal Lighting Plant
c/o Connecticut Municipal Electric Energy Cooperative
30 Stott Avenue
Norwich, CT 06360-1535

Jason Barker
The Cincinnati Gas & Electric Company, Inc.
139 East 4th Street
EA503
Cincinnati, OH 45202

Walt Yaeger (Alt)
The Cincinnati Gas & Electric Company, Inc.
139 East 4th Street
EA503
Cincinnati, OH 45202

Murat Alptekin
Director
Citadel Energy Products LLC
c/o Citadel Investment Group, LLC
225 W. Washington St., 9th Fl.
Chicago, IL 60606

Peter Sullivan (Alt)
Vice President
Citadel Energy Products LLC
c/o Citadel Investment Group, LLC
225 W. Washington St., 9th Fl.
Chicago, IL 60606

Ben Vallieres
Director, Global Commodities
Citigroup Energy Inc.
390 Greenwich Street
5th Floor
New York, NY 10013-2375

Eric Strickland (Alt)
Managing Director, Global Commodities
Citigroup Energy Inc.
390 Greenwich Street
5th Floor
New York, NY 10013-2375

Daniel J. Sack
Superintendent
Concord Municipal Light Plant
1175 Elm Street
P.O. Box 1029
Concord, MA 01742-1029

Tim Peet (Alt)
Concord Municipal Light Plant
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Brian E. Forshaw
Director
Connecticut Municipal Electric Energy Cooperative
30 Stott Avenue
Norwich, CT 06360-1535

Maurice R. Scully (Alt)
Executive Director
Connecticut Municipal Electric Energy Cooperative
30 Stott Avenue
Norwich, CT 06360-1535

Christopher J. Fancher
Connecticut Resources Recovery Authority
100 Constitution Plaza
Hartford, CT 06103

Richard Quelle (Alt)
Connecticut Resources Recovery Authority
100 Constitution Plaza
Hartford, CT 06103

Nubia Perez
Renewable Energy Mkt. Analyst
Conservation Services Group, Inc.
40 Washington Street
Westborough, MA 01581

Doug Hurley (Alt)
Conservation Services Group, Inc.
c/o Synapse Energy Economics Inc.
22 Pearl Street
Cambridge, MA 02139

Kenneth Bekman
Director, Wholesale Power
Consolidated Edison Energy, Inc.
701 Westchester Avenue
Suite 320E
White Plains, NY 10604

Ivan Kimball (Alt)
Consolidated Edison Energy, Inc.
701 Westchester Avenue
Suite 201 West
White Plains, NY 10604

Daniel W. Allegretti
Constellation Energy Commodities Group, Inc.
One Essex Drive
Bow, NH 03304

Sandi Hennequin (Alt)
Constellation Energy Commodities Group, Inc.
111 Market Place
Baltimore, MD 21202

Matthew Picardi
Coral Power, LLC
General Manager – Regulatory Affairs
27 Winthrop Rd.
Hingham, MA 02043

Robert Reilley (Alt)
Vice President-Regulatory Affairs
Coral Power, LLC
909 Fannin Street
Suite 700
Houston, TX 77010

Coleen O'Brien-Pitts
Electric Utility Director
Danvers Electric Division
One Burroughs Street
Danvers, MA 01923-2702

Francis M. Gaffney (Alt)
Power Supply Engineer
Danvers Electric Division
One Burroughs Street
Danvers, MA 01923-2702

Bruce Bleiweis
Director -- Market Affairs
DC Energy, LLC
8065 Leesburg Pike; Suite 500
Vienna, VA 22182

Ware Adams (Alt)
Vice President
DC Energy, LLC
8065 Leesburg Pike; Suite 500
Vienna, VA 22182

August Fromuth
Dennis Beverage Company, Inc.
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Jim Rodier (Alt)
Dennis Beverage Company, Inc.
1500 A Lafayette Road
No. 112
Portsmouth, NH 03801

Kevin Fox
D.E. Shaw Plasma Power, L.L.C.
120 West 45th Street
39th Floor
New York, NY 10036

Mark Masselink (Alt)
D.E. Shaw Plasma Power, L.L.C.
120 West 45th Street
39th Floor
New York, NY 10036

Wesley Walker
Manager Electric Market Policy
Dominion Energy Marketing, Inc.
c/o Dominion Resources Services, Inc.
P.O. Box 25615
Richmond, VA 23260

Timothy J. Morrissey (Alt)
Manager NEPOOL Operations
Dominion Energy Marketing, Inc.
40 Point Street
P.O. Box 6607
Providence, RI 02940

Gregory Pakela
Manager of Operations
DTE Energy Trading, Inc.
101 N. Main Street
Suite 300
Ann Arbor, MI 48104

Gary Alligood (Alt)
Originator
DTE Energy Trading, Inc.
414 South Main Street
Suite 200
Ann Arbor, MI 48104

Stacy L. Dimou
Duke Energy North America LLC
P.O. Box 426
Millinocket, ME 04462

Steve Vavrik
Director
Dynegy Power Marketing, Inc.
c/o Dynegy Marketing & Trade
1000 Louisiana Suite 5800
Houston, TX 77002

Miles Allen (Alt)
Sr. Vice President
Dynegy Power Marketing, Inc.
101 Merrimic Street, 2nd Floor
Boston, MA 02114

William Roberts
SVP Power Contracting
Edison Mission Marketing & Trading, Inc.
160 Federal Street
Boston, MA 02110-1776

Jeffry Ellis (Alt)
Edison Mission Marketing & Trading, Inc.
160 Federal Street
Boston, MA 02110-1776

Marti Fischer
El Paso Marketing, LP
1001 Louisiana Street T8
Houston, TX 77002

Robert Stein (Alt)
Principal Consultant
El Paso Marketing, LP
c/o Signal Hill Consulting Group
128 Merchants Row
Suite 703
Rutland, VT 05701

August Fromuth
Elliot Health System
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Jim Rodier (Alt)
Elliot Health System
1500 A Lafayette Road
No. 112
Portsmouth, NH 03801

Patrick G. Jeffery
Vice President, Government Affairs
Energy America
263 Tresser Blvd.
One Stamford Plaza
8th. Floor
Stamford, CT 06901

Dennis J. Duffy
Energy Management, Inc.
75 Arlington Street, Suite 704
Boston, MA 02116

David Brewster
EnerNOC , Inc.
Two Faneuil Hall
Boston, MA 02109

Philip Giudice (Alt)
EnerNOC , Inc.
Two Faneuil Hall
Boston, MA 02109

Marc Potkin
Entergy Nuclear Generation Company
440 Hamilton Avenue
White Plains, NY 10601

Ronald Mackowiak (Alt)
Entergy Nuclear Generation Company
440 Hamilton Avenue
White Plains, NY 10601

Robert Erbrick
Epic Merchant Energy, L.P.
16360 Park 10 Place
Suite 327
Houston, TX 77084

Erik Abend (Alt)
Epic Merchant Energy, L.P.
P.O. Box 180
Goshen, MA 01032

Denise Foster
Exelon Generation Company, LLC
c/o Exelon Power Team
300 Exelon Way
Kennette Square, PA 19348

William Fowler (Alt)
Exelon Generation Company, LLC
c/o Sigma Consulting Company
20 Main Street
Acton, MA 01720

Fernando DaSilva
Director, Market Affairs
FPL Energy LLC
8 Woodlawn Road
Assonet, MA 02702

F. Allen Wiley (Alt)
Director, Business and Regulatory Affairs,
Northeast Region
FPL Energy, LLC
160 Capitol Street
Augusta, ME 04330

Paul Hesson
Market Development Manager
Gas Recovery Systems, LLC
5101 Morehead Road
Concord, NC 28027

Doug Hurley (Alt)
Gas Recovery Systems, LLC
c/o Synapse Energy Economics Inc.
22 Pearl Street
Cambridge, MA 02139

William C. Rodgers
Generation Group Member
c/o Great Bay Power Marketing, Inc.
1 New Hampshire Avenue, Suite 125
Portsmouth, NH 03801

John Hanlon (Alt)
Generation Group Member
c/o Lowell Power LLC
2 Tanner Street
Lowell, MA 01852

Wayne Snow
Manager
Georgetown Municipal Light Department
94 Searle Street
Georgetown, MA 01833

Tim Peet (Alt)
Georgetown Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Neil Leibman
CEO
Gexa Energy, LLC
20 Greenway Plaza #600
Houston, TX 77046

Michael Woytowich
Granite Ridge Energy, LLC
4401 Fair Lakes Court
Fairfax, VA 22033

Daniel J. Callaghan (Alt)
Granite Ridge Energy, LLC
Project Manager
AES Londonderry
Two Tower Center, 20th Floor
East Brunswick, NJ 08816

Doris Chojowski
Manager
Groton Electric Light Department
23 Station Avenue
Groton, MA 01450-4222

Tim Peet (Alt)
Groton Electric Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Ariane Connor
H.Q. Energy Services (U.S.) Inc.
75, boul. Rene-Levesque Ouest
17e etage
Montreal, Quebec H2Z 1A4
CANADA

Robert Stein (Alt)
Principal Consultant
H.Q. Energy Services (U.S.) Inc.
c/o Signal Hill Consulting Group
128 Merchants Row
Suite 703
Rutland, VT 05701

Mary H. Smith
Manager, Energy Supply and Utility Admin
Harvard Dedicated Energy Limited
46 Blackstone St.
Cambridge, MA 02139

Douglas Garron (Alt)
Director, Engineering and Utilities
Harvard Dedicated Energy Limited
46 Blackstone St.
Cambridge, MA 02139

John G. Tzimorangas
General Manager
Hingham Municipal Lighting Plant
222 Central Street
Hingham, MA 02043-2518

Tim Peet (Alt)
Hingham Municipal Lighting Plant
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Brian J. Bullock
Town Manager
Holden Municipal Light Department
One Holden Street
Holden, MA 01520

Tim Peet (Alt)
Holden Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

James M. Lavelle
Manager
Holyoke Gas & Electric Department
99 Suffolk Street
Holyoke, MA 01040

Brian C. Beauregard (Alt)
Superintendent
Holyoke Gas & Electric Department
99 Suffold Street
Holyoke, MA 01040

Yakov D. Levin
General Manager
Hudson Light & Power Department
49 Forest Avenue
Hudson, MA 01749

Tim Peet (Alt)
Hudson Light & Power Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

John A. MacLeod
Manager
Hull Municipal Lighting Plant
15 Edgewater Road
Hull, MA 02045-2714

Tim Peet (Alt)
Hull Municipal Lighting Plant
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

William P. Short III
Indeck Maine Energy
c/o Ridgewood Power Management, LLC
947 Linwood Avenue
Ridgewood, NJ 07450

John Bahrs (Alt)
Indeck Maine Energy
c/o Ridgewood Power Management, LLC
947 Linwood Avenue
Ridgewood, NJ 07450

Donald J. Sipe
Industrial Energy Consumer Group
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

Anthony Buxton (Alt)
Industrial Energy Consumer Group
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

Raymond R. Shockey
Manager
Ipswich Municipal Light Department
P.O. Box 151
272 High Street
Ipswich, MA 01938-0151

Tim Peet (Alt)
Ipswich Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Gordon van Welie
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841

Kevin Kirby (Alt)
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841

Thomas Hoatson
Vice President
J. Aron & Company
c/o Goldman Sachs & Company
85 Broad Street
New York, NY 10004

Kathy Benini (Alt)
J. Aron & Company
85 Broad Street
New York, NY 10004

Robert J. Gray
President
J.F. Gray & Associates LLC
35 Woodman Road
South Hampton, NH 03827

John F. Gray (Alt)
J.F. Gray & Associates LLC
35 Woodman Road
South Hampton, NH 03827

Donald J. Sipe
J&L Electric
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

Anthony Buxton (Alt)
J&L Electric
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

Christophe Zammit
Vice President
JPMorgan Chase Bank, NA
270 Park Avenue
6th Floor
New York, NY 10017-2014

Andrew R. Moreau
LaBree's, Inc.
816 Elm Street, Suite 364
Old Town, ME 04468

August Fromuth (Alt)
LaBree's, Inc.
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

David Pearson
Lake Road Generating Company
56 Alexander Parkway
Dayville, CT 06241

William Fowler (Alt)
President
Lake Road Generating Company
c/o Sigma Consultants, Inc.
20 Main Street
Acton, MA 01720

August Fromuth
Lincoln Tissue and Paper Co.
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Jim Rodier (Alt)
Lincoln Tissue and Paper Co.
1500 A Lafayette Road
No. 112
Portsmouth, NH 03801

Michael A. Kovach
Linde Gas, LLC
6055 Rockside Woods Blvd.
Independence, OH 44131

Paul Herrgesell (Alt)
Linde Gas, LLC
6055 Rockside Woods Blvd.
Independence, OH 44131

James Parmelee
Director of Power Markets
LIPA
31 Brinker Drive South
Rensselaer, NY 12144

William Killgoar (Alt)
LIPA
c/o Navigant Consulting Inc.
200 Wheeler Road
Burlington, MA 01803

Scott Edwards
Assistant General Manager
Littleton (MA) Electric Light & Water Department
39 Ayer Road
P.O. Box 2406
Littleton, MA 01460-3406

Tim Peet (Alt)
Littleton (MA) Electric Light & Water Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Thomas F. Considine
Superintendent/Manager
Littleton (NH) Water & Light Department
65 Lafayette Avenue
Littleton, NH 03561

Craig Kieny (Alt.)
Littleton (NH) Water & Light Department
P.O. Box 793
Colchester, VT 05446

John Hanlon
Lowell Power LLC
2 Tanner Street
Lowell, MA 01852

Teri M. Pagano (Alt)
Lowell Power LLC
c/o United American Energy Corp.
50 Tice Boulevard
Woodcliff Lake, NJ 07677

Stephen M. Gauthier
Program Manager
Maine Health & Higher Educational Facilities Authority
3 University Drive
P.O. Box 2268
Augusta, ME 04338-2268

Robert O. Lenna (Alt)
Executive Director
Maine Health & Higher Educational Facilities Authority
3 University Drive
P.O. Box 2268
Augusta, ME 04338-2268

Donald J. Sipe
Maine Skiing, Inc.
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

Anthony Buxton (Alt)
Maine Skiing, Inc.
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

Gary Babin
Director
Mansfield Electric Light Department
125 High Street, Suite 4
Mansfield, MA 02048-2404

Tim Peet (Alt)
Mansfield Electric Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Robert V. Jolly Jr.
Manager
Marblehead Municipal Light Department
80 Commercial Street
P.O. Box 369
Marblehead, MA 01945-0369

Tim Peet (Alt)
Marblehead Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

August Fromuth
Marden's, Inc.
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Jim Rodier (Alt)
Marden's, Inc.
1500 A Lafayette Road
No. 112
Portsmouth, NH 03801

John J. McSweeney, Jr.
Director of Operations Support
Massachusetts Bay Transportation Authority
45 High Street
Boston, MA 02110

Mayhew Seavey (Alt)
Principal
Massachusetts Bay Transportation Authority
c/o PLM, Inc.
35 Main Street
Hopkinton, MA 01748

Timothy Peet
Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Frank Gorke
Massachusetts Public Interest Research Group
29 Temple Place
5th Floor
Boston, MA 02111

Donald J. Sipe
Mead Oxford Corporation
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

Anthony Buxton (Alt)
Mead Oxford Corporation
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

August Fromuth
Merchants Plaza, LLC
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Keith Bailey
President
Merrill Lynch Commodities Inc.
Four World Financial Center
12th Floor
New York, NY 10080

Locke McMurray (Alt)
Merrill Lynch Commodities Inc.
Four World Financial Center
12th Floor
New York, NY 10080

James L. Collins
Energy Analyst
Middleborough Gas & Electric
2 Vine Street
Middleborough, MA 02346

Tim Peet (Alt)
Middleborough Gas & Electric
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Mark T. Kelly
Manager
Middleton Municipal Light Department
197 North Main Street
Middleton, MA 01949-1068

Tim Peet (Alt)
Middleton Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Peter Podriguel
Milford Power Company, LLC
35 Braintree Hill Office Park
Suite 107
Braintree, MA 02184

Gary Lambert (Alt)
Milford Power Company, LLC
35 Braintree Hill Office Park
Suite 107
Braintree, MA 02184

Peter D. Fuller
Mirant Americas Energy Marketing, LP
9 Freezer Road
Sandwich, MA 02562

Philip C. Smith (Alt)
Mirant Americas Energy Marketing, LP
3 Wandover Way
Newburyport, MA

David Samuels
Morgan Stanley Capital Group, Inc.
1585 Broadway
4th floor
New York, NY 10036

Karen Kochonies (Alt)
Vice President
Morgan Stanley Capital Group, Inc.
1585 Broadway, 4th floor
New York, NY 10036

Norman Davis
Morin Brick Company
3600 Old Danville Rd
Auburn, ME 04211

August Fromuth (Alt)
Morin Brick Company
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Michael Hager
New England Power Company
25 Research Drive
Westborough, MA 01582

Mary Ellen Paravalos (Alt)
New England Power Company
25 Research Drive
Westborough, MA 01582

John Fitzgerald
Accounting Manager
New England Wire Technologies Corp.
130 North Main Street
Lisbon, NH 03585

Jim Elliott
Purchasing Manager
New England Wire Technologies Corp.
130 North Main Street
Lisbon, NH 03585

Fred C. Anderson
General Manager
New Hampshire Electric Cooperative, Inc.
579 Tenney Mountain Highway
Plymouth, NH 03264-3147

Stephen Kaminski (Alt)
Director, Energy Access & Services
New Hampshire Electric Cooperative, Inc.
579 Tenney Mountain Highway
Plymouth, NH 03264-3147

Michael C. White
Global Sourcing Manager
New Hampshire Industries Inc.
68 Etna Road
Lebanon, NH 03766

J. Todd Miller (Alt)
President
New Hampshire Industries Inc.
68 Etna Road
Lebanon, NH 03766

Paul Peterson
New Hampshire Office of Consumer Advocate
c/o Synapse Energy Economics, Inc.
22 Pearl Street
Cambridge, MA 02139

Mark V. Magyar
North Attleborough Electric
c/o Financial Management Group
325A Southbridge Street
Auburn, MA 01501

Tim Peet (Alt)
North Attleborough Electric
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Joseph J. Staszowski
Director, Generation Resource Planning
& Cogen. Admin.
Northeast Utilities System Companies
c/o Select Energy, Inc.
107 Selden Street
Berlin, CT 06037

James R. Shuckerow (Alt)
Director-Wholesale Power Contracts
Northeast Utilities System Companies
P.O. Box 270
Hartford, CT 06141-0270

Eric Pierce
Managing Director, Energy Trading
Northern States Power Company
1099 18th Street
Denver, CO 80202

Tim Jurco (Alt)
Manager, Real Time Trading
Northern States Power Company
1099 18th Street
Denver, CO 80202

Malcolm N. McDonald
Superintendent
Norwood Municipal Light Department
206 Central Street
Norwood, MA 02062-3567

Joel Gordon
Director, Market Policy
NRG Power Marketing Inc.
7 Steeple Lane
Amherst, NH 03031

August Fromuth
Old Town Lumber Co.
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Jerry Tudan (Alt)
Old Town Lumber Co.
12 North Folk Road
Harpswell, ME 04079

August Fromuth
The Order of St. Benedict of New Hampshire, d/b/a Saint Anselm College
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Wing Choi
Parkview Adventist Medical Center
VP - Finance, CFO
329 Main Street
Brunswick, ME 04011

August Fromuth (Alt)
Parkview Adventist Medical Center
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Theodore G. Garill
General Manager
Pascoag Utility District
55 South Main Street
P.O. Box 107
Pascoag, RI 02859-0107

Tim Peet (Alt)
Pascoag Utility District
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Diane Dillman
Manager
Paxton Municipal Light Department
578 Pleasant Street
Paxton, MA 01612-1365

Tim Peet (Alt)
Paxton Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Ronald Tabroff
Supervisor, Electrical Engineer
Peabody Municipal Light Plant
201 Warren Street, Ext.
Peabody, MA 01960-4208

Tim Peet (Alt)
Peabody Municipal Light Plant
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Thomas E. Atkins
President
Pinpoint Power LLC
c/o /DRP Group Member
1040 Great Plain Avenue, 2nd Floor
Needham, MA 02492

Ken Roberts, Jr. (Alt)
Pinpoint Power LLC
c/o DRP Group Member
1040 Great Plain Avenue, 2nd Floor
Needham, MA 02492

Lisa Wagner
Manager, Contracts and Trade Policy
Powerex Corp.
66 Burrard Street
Suite 1400
Vancouver, BC V6C 2X8
CANADA

Michelle Hiley (Alt)
Portfolio Manager, Eastern Operations
Powerex Corp.
66 Burrard Street
Suite 1400
Vancouver, BC V6C 2X8
CANADA

Benson Caswell
President
PowerOptions, Inc.
99 Summer Street
Boston, MA 02110-1240

Douglas Stevenson (Alt)
PowerOptions, Inc.
Rte. 1, P.O. Box 398
Wayne, ME 04284

Tom Hyzinski
PPL EnergyPlus, LLC
2 North Ninth Street
Allentown, PA 18101-1179

Sharon Weber (Alt)
PPL EnergyPlus, LLC
2 North Ninth Street
Allentown, PA 18101-1179

Reed Armstrong
PPM Originator
PPM Energy Inc.
20333 State Hwy, Suite 300
Houston, TX 77070

Murray O'Neil (Alt)
Analyst
PPM Energy Inc.
1125 NW Couch
Suite 700
Portland, OR 97209

Robert A. Weishaar, Jr., Esq.
Praxair, Inc.
c/o McNees Wallace & Nurick LLC
777 North Capitol Street, N.E.
Suite 401
Washington, DC 20002

Jennifer Hunsperger (Alt)
Account Manager, Eastern Region
Praxair, Inc.
126 Windham Drive
Langhorne, PA 10947

Daniel P. Ciullo
Marketing Manager – New England
PSEG Energy Resources & Trade LLC
80 Park Plaza – T19
Newark, NJ 07102-4194

Jeffrey D. Jonson
Rainbow Energy Marketing Corp.
919 7th St., Ste. 405
Bismark, ND 58504

Joe Wolfe (Alt)
Rainbow Energy Marketing Corp.
919 7th St., Ste. 405
Bismark, ND 58504

Vincent F. Cameron Jr.
Assistant General Manager - Energy and Operations
Reading Municipal Light Department
230 Ash Street
Reading, MA 01867-0250

William Seldon (Alt)
Reading Municipal Light Department
230 Ash Street
P.O. Box 150
Reading, MA 01867-0250

Frank Zammataro
Rentricity Inc.
PO Box 1021
Planetarium Station
New York, NY 10024

Al Spinell (Alt)
Rentricity Inc.
PO Box 1021
Planetarium Station
New York, NY 10024

Brian Bacher
Ritchie Energy Products, LLC
c/o Ritchie Capital Management
2100 Enterprise Avenue
Geneva, IL 60134

Donald Kane (Alt)
Ritchie Energy Products, LLC
c/o Ritchie Capital Management
2100 Enterprise Avenue
Geneva, IL 60134

G. Robert Merry
Manager
Rowley Municipal Light Plant
47 Summer Street
Rowley, MA 01969

Timothy Peet (Alt)
Rowley Municipal Light Plant
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Bill Reed
Saracen Energy, LP
2001 Hermann Drive
Houston, TX 7704

Darren Lobdell (Alt)
Saracen Energy, LP
2001 Hermann Drive
Houston, TX 7704

Daniel Staines
Sempra Energy Trading Group
58 Commerce Road
Stamford, CT 06902

Barry Trayers (Alt)
Sempra Energy Trading Group
58 Commerce Road
Stamford, CT 06902

Peter Zeliff
Seneca Energy, LLC
c/o Innovative Energy Systems, Inc.
2917 Judge Road
Oakfield, NY 14125

Doug Hurley (Alt)
Seneca Energy, LLC
c/o Synapse Energy Economics Inc.
22 Pearl Street
Cambridge, MA 02139

Michael Schubiger
SESCO Enterprises, LLC
120 Wood Avenue South
Suite 511
Iselin, NJ 08830

Patrick Suseri (Alt)
Executive Vice President
SESCO Enterprises, LLC
120 Wood Avenue South
Suite 511
Iselin, NJ 08830

Thomas R. Josie
General Manager
Shrewsbury Electric & Cable Operations
100 Maple Avenue
Shrewsbury, MA 01545-5398

Timothy Peet (Alt)
Shrewsbury Electric & Cable Operations
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Silkman, Richard
76 Main Street
Yarmouth, ME 04096

Donald J. Sipe (Alt)
Silkman, Richard
c/o Preti, Flaherty, Beliveau, Pachios & Haley
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

Wayne D. Doerpholz
Manager
South Hadley Electric Light Department
85 Main Street
South Hadley, MA 01075-2706

Tim Peet (Alt)
South Hadley Electric Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Peter J. Garratt
Split Rock Energy
Vice President, Power Trading
301 4th Ave South
Suite 860N
Minneapolis, MN 55415

Laureen Ross McCalib (Alt)
Split Rock Energy
Vice President, Power Marketing
301 4th Ave South
Suite 860N
Minneapolis, MN 55415

Thomas Schumacher
SR Energy, LLC
3600 South Lake Drive
St. Francis, WI 53235

Dale Kruchten (Alt)
SR Energy, LLC
3600 South Lake Drive
St. Francis, WI 53235

Jamie Cote
Sprague Energy Corp.
Two International Drive
Portsmouth, NH 03801-6809

Mary J. Healey
State of Connecticut, **Office of Consumer Counsel**
Ten Franklin Square
New Britain, CT 06051

Richard Steeves (Alt)
State of Connecticut, **Office of Consumer Counsel**
Ten Franklin Square
New Britain, CT 06051

Beth Nagusky
State of Maine, Office of the Governor
112 State House Station
Augusta, ME 04333

Stephen G. Ward (Alt)
State of Maine, Office of the Governor
112 State House Station
Augusta, ME 04333

John Kilgo Jr.
Manager
Sterling Municipal Light Department
50 Main Street
Sterling, MA 01564-2129

Tim Peet (Alt)
Sterling Municipal Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Jason Barker
Wholesale Market Manager
Strategic Energy LLC
1302 Herlin Place
Cincinnati, OH 45208

Jeff Knox (Alt)
Strategic Energy LLC
Two Gateway Center, 9th Floor
Pittsburgh, PA 15222

Steve Adams
Director
SUEZ Energy Marketing NA, Inc.
1990 Post Oak Blvd., Suite 1900
Houston, TX 77056-4499

Jeff Engelman
Susquehanna Energy Products, LLC
401 City Avenue
Bala Cynwyd, PA 19004

Chris Harden (Alt)
Susquehanna Energy Products
401 City Avenue
Bala Cynwyd, PA 19004

R. Scott Whittemore
Manager Energy Services and Planning
Taunton Municipal Lighting Plant
55 Weir Street
P.O. Box 870
Taunton, MA 02780-0870

Brian Forshaw
Taunton Municipal Lighting Plant
c/o Connecticut Municipal Electric Energy Cooperative
30 Stott Avenue
Norwich, CT 06360-1535

Sean Hamilton
Manager
Templeton Municipal Light Plant
School Street
Baldwinville, MA 01436

Tim Peet (Alt)
Templeton Municipal Light Plant
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Jeffrey Bergman
Utilities Manager
Texas Instruments
MS 10-04
34 Forest Street
Attleboro, MA 02703

Mark Sestak (Alt)
Facilities Engineer
Texas Instruments
MS 10-04
34 Forest Street
Attleboro, MA 02703

John Farley
Executive Director
The Energy Council of Rhode Island
One Richmond Square, Suite 340 D
Providence, RI 02906

Michael Hoffer (Alt)
Vice Chairman Exec. Board
The Energy Council of Rhode Island
7 Madeline Drive
Newport, RI 02840-1714

Roger Borghesani
Chairman
The Energy Consortium
24 Hastings Road
Lexington, MA 02421-6807

Mary Smith (Alt)
The Energy Consortium
175 North Harvard Street
Boston, MA 02134

Dean McAfee
TransAlta Energy Marketing (U.S.) Inc.
110 12 Ave. SW
Calgary, AB T2P2M1

Russell Asplund (Alt)
TransAlta Energy Marketing (U.S.) Inc.
151 West Street
Suite 300
Annapolis, MD 21401

Stuart Ormsbee
Vice President
TransCanada Power Marketing Ltd.
110 Turnpike Road
Suite 203
Westborough, MA 01581

Michael E. Hachey (Alt)
Director, Power Marketing
TransCanada Power Marketing Ltd.
110 Turnpike Road
Suite 203
Westborough, MA 01581

Michael S. Grim
Director, Markets & Regulatory
TXU Portfolio Management Co. LP
1717 Main Street, Suite 17000
Dallas, TX 75201

Elizabeth Howland (Alt)
Manager of Advocacy Projects – Public Policy
TXU Portfolio Management Co. LP
1601 Bryan Street
Dallas, TX 75201

Elizabeth Sager
UBS AG
677 Washington Boulevard
8th Floor
Stamford, CT 06901

Paul R. Peterson
Union of Concerned Scientists
c/o Synapse Energy Economics, Inc.
22 Pearl Street
Cambridge, MA 02139

Robert T. Gagliardi
Director, Strategic Policy
The United Illuminating Company
157 Church Street - 1-15D
P.O. Box 1564
New Haven, CT 06506-0901

Dennis Hrabchak (Alt)
Vice President Regulatory Policy
The United Illuminating Company
157 Church Street-15th Floor
P.O. Box 1564
New Haven, CT 06506-0901

David K. Foote
Vice President
Unitil Corporation Participant Companies
6 Liberty Lane West
Hampton, NH 03842-1720

Peter Gish
UPC Wind Management, LLC
Managing Director
100 Wells Ave.
Suite 201
Newton, MA 02459-3210

Terri Pollman (Alt.)
UPC Wind Management, LLC
Operations and Administrative Manager
100 Wells Avenue
Suite 201
Newton, MA 02459-3210

Craig Kieny
Vermont Electric Cooperative
182 School Street
Johnson, VT 05656

Thomas N. Wies
Vice President & General Counsel
Vermont Electric Power Company, Inc.
366 Pinnacle Ridge Road
Rutland, VT 05701

Scott Mallory (Alt)
Vermont Electric Power Company, Inc.
366 Pinnacle Ridge Road
Rutland, VT 05701

Todd Allard
Vermont Marble Company
61 Main Street
Proctor, VT 05765

Michael Boyea (Alt)
Vermont Marble Company
61 Main Street
Proctor, VT 05765

William J. Gallagher
General Manager
Vermont Public Power Supply Authority
P.O. Box 298
Waterbury Center, VT 05677

Brian Evans-Mongeon (Alt)
Manager of Power Supply & Marketing Service
Vermont Public Power Supply Authority
P.O. Box 298
Waterbury Center, VT 05677

William J. Wallace
Manager
Wakefield Municipal Gas and Light Department
9 Albion Street
P.O. Box 190
Wakefield, MA 01880-0390

Tim Peet (Alt)
Wakefield Municipal Gas and Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Mark Noyes
WebGen Systems Inc.
41 William Linsky Way
Cambridge, MA 02142

Paul Taglianetti (Alt)
WebGen Systems Inc.
41 William Linsky Way
Cambridge, MA 02142

Richard F. Joyce
Director
Wellesley Municipal Lighting Plant
455 Worcester Street
Wellesley, MA 02481

Joyce M. D. Wood (Alt)
Wellesley Municipal Lighting Plant
c/o Onway Lake Consulting
11 Forest Road
Raymond, NH 03077

John Scirpoli
Manager
West Boylston Municipal Lighting Plant
4 Crescent Street
West Boylston, MA 01583-1310

Tim Peet (Alt)
West Boylston Municipal Lighting Plant
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

Richard J. Munson
Director of Plant Operations
The Westerly Hospital
25 Wells Street
Westerly, RI 02891

August Fromuth (Alt)
The Westerly Hospital
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Daniel Golubek (Alt)
Manager
Westfield Gas and Electric Light Department
100 Elm Street
Westfield, MA 01085-2907

Tim Peet (Alt)
Westfield Gas and Electric Light Department
c/o Mass. Municipal Wholesale Electric Co.
Moody Street
P.O. Box 426
Ludlow, MA 01056-0246

David K. Singer
Williams Power Company, Inc.
One Williams Center
Tulsa, OK 74172

Dennis Keener (Alt)
Williams Power Company, Inc.
One Williams Center
Mail Drop 35-7
P.O. Box 3448
Tulsa, OK 74101-9567

Tim Charette
Power Marketing Executive
WPS Energy Services Inc.
1242 Lower Lyndon Street
Caribou, ME 04736

Ed Howard (Alt)
Power Marketing Executive
WPS Energy Services Inc.
1242 Lower Lyndon Street
Caribou, ME 04736

F. Paul Russo
ZTECH, LLC
8 Dow Road
Bow, NH 03304

August Fromuth (Alt)
ZTECH, LLC
c/o Freedom Energy Partners, LLC
816 Elm Street
Suite 364
Manchester, NH 03101

Non-Market Participant Transmission Customers
October 26, 2005

Miller Hydro Group
P.O. Box 97
Lisbon Falls, ME 04252-0097

Massachusetts Government Land Bank
Devens Commerce Center
43 Buena Vista
Ft. Devens, MA 01433

Town of Wolfeboro Municipal Electric Department
84 S. Main St.
Wolfeboro, NH 03894

Princeton Municipal Light Department
168 Worcester Road, PO Box 247
Princeton, MA 01541

Attachment 6

New England Governors
and Utility Regulatory
and Related Agencies

October 26, 2005

Connecticut

The Honorable M. Jodi Rell
State Capitol
210 Capitol Ave.
Hartford, CT 06106

Connecticut Department of Public Utility Control
10 Franklin Square
New Britain, CT 06051-2605

Maine

The Honorable John E. Baldacci
One State House Station
Rm. 236
Augusta, ME 04333-0001

Maine Public Utilities Commission
State House, Station 18
242 State Street
Augusta, ME 04333-0018

Massachusetts

The Honorable Mitt Romney
Office of the Governor
Rm. 360 State House
Boston, MA 02133

Massachusetts Department of Telecommunications and Energy
One South Station
Boston, MA 02110

New Hampshire

The Honorable John H. Lynch
State House
25 Capitol Street
Concord, NH 03301

New Hampshire Public Utilities Commission
21 South Fruit Street
Suite 10
Concord, NH 03301-2429

Rhode Island

The Honorable Donald L. Carcieri
State House Room 115
Providence, RI 02903

Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Vermont

The Honorable James Douglas
109 State Street, Pavilion
Montpelier, VT 05609

Vermont Public Service Board
112 State Street, Drawer 20
Montpelier, VT 05620-2701

New England Governors
and Utility Regulatory
and Related Agencies **October 26, 2005**

Thomas B. Getz, President
New England Conference of
Public Utilities Commissioners, Inc.
c/o NH Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

William M. Nugent
Executive Director
New England Conference of
Public Utilities Commissioners, Inc.
500 U.S. Route 1, Suite 21 C
Yarmouth, ME 04096

Harvey L. Reiter, Esq.
Counsel for New England Conference
of Public Utilities Commissioners, Inc.
c/o MORRISON HECKER
1150 18th Street, NW, Suite 800
Washington, DC 20036-3816

Power Planning Committee
New England Governors Conference, Inc.
76 Summer Street, 2nd Floor
Boston, MA 02110