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**** ELECTRONICALLY FILED ON APRIL 16, 2008 ****

Ms. Karen Geraghty
Administrative Director
Maine Public Utilities Commission
State House Station 18
242 State Street
Augusta, ME 04333

RE: Docket No. 2008-156 - Investigation of Maine Utilities Continued
Participation in ISO-NE

**THIS IS A VIRTUAL DUPLICATE OF THE ORIGINAL HARDCOPY
SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS
ELECTRONIC FILING INSTRUCTIONS**

Dear Ms. Geraghty:

Please accept via electronic filing the comments of the New England Power Generators, Inc. in the above referenced docket. Please contact me if there is any disruption in the transmission or if you require me to provide anything further to validate this filing.

Very truly yours,

A handwritten signature in blue ink, which appears to read 'Christopher P. Sherman', is positioned above the typed name.

Christopher P. Sherman
General Counsel

**STATE OF MAINE
PUBLIC UTILITIES COMMISSION**

April 16, 2008

**MAINE PUBLIC UTILITIES
COMMISSION
Investigation of Maine Utilities Continued
Participation in ISO-NE**

Docket No. 2008-156

**Petition to Intervene of The New England
Power Generators Association, Inc.**

I. INTRODUCTION

Pursuant to the Notice of Investigation issued by the Maine Public Utilities Commission (“PUC”) dated April 8, 2008, the New England Power Generators Association, Inc. (“NEPGA”) hereby respectfully files this timely Petition to Intervene in the above-captioned proceeding.¹ NEPGA requests that all further correspondence, communications and other documents relating to this matter be served upon the undersigned.

II. BACKGROUND

The Independent System Operator for New England (“ISO-NE”) has been the Regional Transmission Organization (“RTO”) for New England since February 1, 2005. As the RTO, ISO-NE is responsible for the day-to-day operation of the regional grid as well as for administering the regional markets pursuant to a set of tariffs and rules approved by the Federal Energy Regulatory Commission (“FERC”). During the 2006 legislative session the Maine Legislature enacted a Resolve, To Direct the Public Utilities Commission to Examine Continued Participation by Transmission and Distribution Utilities in this State in the New England Regional Transmission Organization (“Resolve”).² Pursuant to the Resolve, the PUC opened an inquiry on June 29, 2006, through Docket No. 2006-364 to produce findings and recommendations to the Utilities and Energy Committee of the Legislature regarding the costs and benefits of Central Maine Power Company (“CMP”) and Bangor Hydro-Electric (“BHE”) continuing to participate in the New England RTO. Within Docket No. 2006-364, the PUC staff had previously issued an Interim Report on the status of the inquiry containing the following findings: significant inequities exist in the RTO transmission cost allocation system and the pricing of generation services; there are no insurmountable legal, economic or technical barriers to CMP and BHE withdrawing from the RTO; and there are reasonable alternatives to continued participation in the RTO. The Interim Report was filed with the Maine Legislature on January 16, 2007.

¹ The views expressed in this filing do not necessarily represent the positions of each of NEPGA’s members. In addition, nothing in this Petition to Intervene should be deemed to waive any rights that NEPGA or any of its members may have to otherwise challenge the administrative, procedural or substantive validity of the proposed regulations in any forum.

² Resolves 2005, Ch. 187.

On December 1, 2007, the PUC released the Draft Report in Docket No. 2006-364 for comment and subsequent submission to the Maine Legislature by January 1, 2008, in compliance with the Resolve. The Draft Report presented three options for Maine's market structure including: (1) remaining part of a reformed ISO-NE; (2) forming an Independent Transmission Company; (3) joining with New Brunswick and, possibly, other Maritime Canadian provinces to manage the collective bulk power system.

NEPGA filed comments on December 21, 2007, in Docket No. 2006-364 requesting that the PUC encourage the Maine Legislature to reject the Maine ITC and Maine/New Brunswick Common Market proposals, as not satisfying the goals and objectives of Maine's overall energy policies, and instead continue to work within the existing RTO regulatory regime with meaningful stakeholder participation to develop the necessary modifications to the RTO structure, governance and operations as deemed prudent to accomplish the overall goals of Maine's electricity restructuring goals under 35-A MRSA §3215. NEPGA and the Electric Power Supply Association ("EPSA") jointly filed similar comments on July 18, 2006 in response to the Commission's request for initial written submission's to its inquiry on Maine T&D utilities continued participation in the New England Regional Transmission Organization ("NERTO").

III. INTERVENTION OF NEPGA

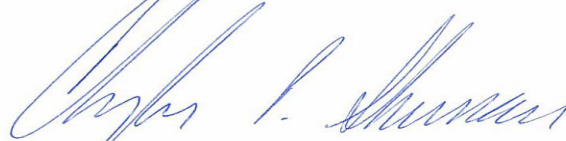
NEPGA is the largest trade association representing competitive electric generating companies in New England. NEPGA's member companies represent approximately 25,000 megawatts of generating capacity throughout the region, and approximately 1,800 megawatts located in Maine. NEPGA's mission is to promote sound energy policies which will further economic development, jobs, and balanced environmental policy.

NEPGA's member companies have been involved in the design and development of all of the competitive wholesale markets in the United States during the last ten years. In that time, markets, especially in the ISO-NE region, have developed the necessary framework to support robust competition. NEPGA is equally committed to the continued evolution of competitive wholesale markets, to further the economic and reliability benefits that markets can deliver to consumers and the economy as a whole. Maine's interest in promoting environmentally conscious, reliable and cost effective electricity are consistent with the interests of NEPGA and the New England region. As active participants in the ISO-NE markets, NEPGA's member companies have substantial and direct interests in the outcome of these proceedings, and those interests cannot be adequately represented by any other party in the proceeding. NEPGA hereby timely moves to intervene in accordance with §722 of the PUC's Rules of Practice and Procedure.

IV. CONCLUSION

NEPGA hereby respectfully requests that the Commission consider its timely Petition to Intervene as submitted herein.

Respectfully submitted,



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Dated: April 16, 2008