

May 15, 2015

VIA HAND DELIVERY

Mr. Mark J. Langer, Clerk
United States Court of Appeals
District of Columbia Circuit
333 Constitution Avenue, N.W.
Room 5523
Washington, D.C. 20001-2866

UNITED STATES COURT OF APPEALS
FOR DISTRICT OF COLUMBIA CIRCUIT

MAY 15 2015

RECEIVED

Phyllis G. Kimmel
Special Counsel
T. 202-753-3434
F. 202-354-4985
pkimmel@mccarter.com

Re: New England States Committee on Electricity, Inc., *et al.* vs. Federal Energy
Regulatory Commission, No. 15-_____
Petition for Review

Dear Mr. Langer:

On behalf of the New England States Committee on Electricity, Inc., the Commissioner of the Connecticut Department of Energy and Environmental Protection, the Connecticut Public Utilities Regulatory Authority, the Department of Public Utilities of the Commonwealth of Massachusetts, the Rhode Island Public Utilities Commission, the State of New Hampshire Public Utilities Commission, and the Vermont Public Service Department (collectively, "Petitioners"), please find enclosed for filing one (1) original and four (4) copies of a Petition for Review of orders by the Federal Energy Regulatory Commission ("FERC"), together with copies of the orders of which Petitioners seek review. Accompanying the Petition are one (1) original and four (4) copies of the Corporate Disclosure Statement for the Petitioners. Please also find enclosed a check in the amount of \$500.00 payable to the Clerk, U.S. Court of Appeals – D.C. Circuit for the fee associated with this filing.

We have included an extra copy of the Petition for Review and Corporate Disclosure Statement for service by the Clerk's office to the Respondent.

Two (2) copies of the Petition, the accompanying orders, and the Corporate Disclosure Statement will be hand-delivered to the FERC Solicitor's office today. Copies of the Petition and the Corporate Disclosure Statement will be electronically served today on all parties to the FERC proceedings below.

Finally, we have enclosed three (3) additional copies of the Petition and accompanying documents. Kindly date-stamp these copies and return them to our courier. One (1) copy of the date-stamped Petition and accompanying documents will be hand-delivered to the FERC Secretary's office today.

McCarter & English, LLP
1015 15th Street, NW
12th Floor
Washington, DC 20005
T. 202.753.3400
F. 202.296.0166
www.mccarter.com

BOSTON

HARTFORD

STAMFORD

NEW YORK

NEWARK

EAST BRUNSWICK

PHILADELPHIA

WILMINGTON

WASHINGTON, DC

Mr. Mark J. Langer, Clerk
May 15, 2015
Page 2

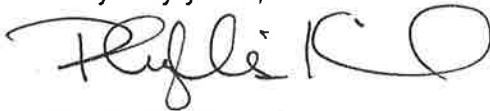
The service addresses for the respondent are as follows:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Robert Solomon, Solicitor
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Please contact me should you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Phyllis G. Kimmel". The signature is fluid and cursive, with a large initial "P" and "K".

Phyllis G. Kimmel
McCarter & English, LLP
Attorney for the New England States Committee on Electricity, Inc.

Enclosures

cc: Mr. Robert H. Solomon, Solicitor, Federal Energy Regulatory Commission
(via hand delivery)
Ms. Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission
(via hand delivery)
Service lists for FERC Docket Nos. ER13-193-000, ER13-196-000, ER13-
193-001, ER13-193-003, ER13-196-001 and ER13-196-003 (via electronic
service)

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

New England States Committee on)	
Electricity, Inc., <i>et al.</i> ,)	
Petitioners,)	
)	No. 15-_____
v.)	
)	
Federal Energy Regulatory Commission)	
Respondent.)	

**JOINT PETITION FOR REVIEW OF THE NEW ENGLAND
STATES COMMITTEE ON ELECTRICITY, INC., CONNECTICUT
DEPARTMENT OF ENERGY AND ENVIRONMENTAL
PROTECTION, CONNECTICUT PUBLIC UTILITIES
REGULATORY AUTHORITY, THE DEPARTMENT OF PUBLIC
UTILITIES OF THE COMMONWEALTH OF MASSACHUSETTS,
THE RHODE ISLAND PUBLIC UTILITIES COMMISSION, THE
STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION,
AND THE VERMONT PUBLIC SERVICE DEPARTMENT**

Pursuant to Section 313(b) of the Federal Power Act, 16 U.S.C. §
825l(b), and Rule 15(a) of the Federal Rules of Appellate Procedure AND
Circuit Rule 15 of the Circuit Rules for the United States Court of Appeals
for the District of Columbia Circuit, the New England States Committee on
Electricity, Inc. (“NESCOE”), the Commissioner of the Connecticut
Department of Energy and Environmental Protection (“CT DEEP”), the
Connecticut Public Utilities Regulatory Authority (“CT PURA”), the
Department of Public Utilities of the Commonwealth of Massachusetts

(“MA DPU”), the Rhode Island Public Utilities Commission (“RI PUC”), the State of New Hampshire Public Utilities Commission (“NH PUC”), and the Vermont Public Service Department (“VT PSD”), jointly and severally, hereby petition this Court for judicial review of the following two orders of the Federal Energy Regulatory Commission (“FERC”):¹

1. *ISO New England Inc.*, Order on Compliance Filings, 143 FERC ¶ 61,150 (May 17, 2013) (FERC Docket Nos. ER13-193-000 and ER13-196-000); and
2. *ISO New England Inc.*, Order on Rehearing and Compliance, 150 FERC ¶ 61,209 (March 19, 2015) (FERC Docket Nos. ER13-193-001, ER13-193-003, ER13-196-001 and ER13-196-002).

Copies of these orders are attached.

¹ The NESCOE Manager for Maine has indicated that Maine is not joining this petition. All petitioners listed herein reserve their rights to file separate statements of issues, to raise distinct issues in the briefs, and to file separate pleadings in this proceeding.

Respectfully submitted,

**New England States Committee on
Electricity, Inc.:**



John Michael Adragna
Phyllis G. Kimmel
McCarter & English, LLP
1015 Fifteenth Street, N.W.
Twelfth Floor
Washington, DC 20005
(202) 753-3400
jadragna@mccarter.com
pkimmel@mccarter.com

/s/ Jason Marshall

Jason Marshall
General Counsel
New England States Committee
on Electricity, Inc.
655 Longmeadow Street
Longmeadow, MA 01106
(617) 913-0342
jasonmarshall@nescoe.com

Attorneys for the New England States
Committee on Electricity, Inc.

**Connecticut Department of Energy and
Environmental Protection:**

/s/ Robert Snook

Robert Snook, AAG
Office of the Attorney General
Ten Franklin Square
New Britain, CT 06051
(860) 827-2657
Robert.Snook@ct.gov

Attorney for the Connecticut Department of
Energy and Environmental Protection

**Connecticut Public Utilities
Regulatory Authority:**

/s/ Clare Kindall

Clare Kindall, AAG
Department Head – Energy
Office of the Attorney General
Ten Franklin Square
New Britain, CT 06051
(860) 827-2683
Clare.kindall@ct.gov

Attorney for the Connecticut Public Utilities
Regulatory Authority

**Massachusetts Department of Public
Utilities:**

Cecile M. Fraser, Counsel
Jeffrey M. Leupold, Senior Counsel
Massachusetts Department of Public Utilities
One South Station, Fifth Floor
Boston, MA 02110
(617) 305-3621
Cecile.Fraser@state.ma.us
Jeffrey.Leupold@state.ma.us

Attorneys for the Massachusetts Department
of Public Utilities

**New Hampshire Public Utilities
Commission:**

/s/ F. Anne Ross _____
F. Anne Ross
General Counsel
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429
(603) 271-2431
f.anne.ross@puc.nh.gov

Attorney for the New Hampshire Public
Utilities Commission

Rhode Island Public Utilities Commission:

/s/ Leo J. Wold _____

Leo J. Wold
Assistant Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400, ext. 2218
lwold@riag.ri.gov

Attorney for the Rhode Island Public Utilities
Commission

Vermont Department of Public Service:

/s/ Edward McNamara _____

Edward McNamara
Regional Policy Director
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620
(802) 828-4007
ed.mcnamara@state.vt.us

Attorney for the Vermont Department of Public
Service

May 15, 2015

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

New England States Committee on)	
Electricity, Inc., <i>et al.</i> ,)	
Petitioners,)	
)	No. 15-_____
v.)	
)	
Federal Energy Regulatory Commission)	
Respondent.)	

CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Circuit Rule 26.1, the Petitioners state as follows:

The New England States Committee on Electricity, Inc. (“NESCOE”) is a 501(c)(4) non-profit organization organized and existing under the laws of Connecticut, and has its principal place of business at 655 Longmeadow Street, Longmeadow, MA 01106.

NESCOE is governed by a board of managers appointed by the governors of Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. NESCOE’s purpose is to represent the interests of the citizens of the New England region by advancing policies that will provide electricity at the lowest reasonable cost over the long term, consistent with maintaining reliable service and environmental quality.

NESCOE has no parent companies, and no publicly held company has a 10% or greater ownership interest in NESCOE.

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Circuit Rule 26.1, the other Petitioners are not required to provide Corporate Disclosure Statements because each is a government entity formed under the laws of their respective states, as follows:

The Commissioner of the Connecticut Department of Energy and Environmental Protection is a government entity formed under the laws of the state of Connecticut;

The Connecticut Public Utilities Regulatory Authority is a government entity formed under the laws of the state of Connecticut;

The Department of Public Utilities of the Commonwealth of Massachusetts is a government entity formed under the laws of the Commonwealth of Massachusetts;

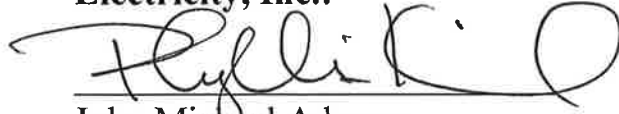
The Rhode Island Public Utilities Commission is a government entity formed under the laws of the state of Rhode Island;

The State of New Hampshire Public Utilities Commission is a government entity formed under the laws of the state of New Hampshire;
and

The Vermont Public Service Department is a government entity
formed under the laws of the state of Vermont.

Respectfully submitted,

**New England States Committee on
Electricity, Inc.:**



John Michael Adragna
Phyllis G. Kimmel
McCarter & English, LLP
1015 Fifteenth Street, N.W.
Twelfth Floor
Washington, DC 20005
(202) 753-3400
jadragna@mccarter.com
pkimmel@mccarter.com

/s/ Jason Marshall

Jason Marshall
General Counsel
New England States Committee
on Electricity, Inc.
655 Longmeadow Street
Longmeadow, MA 01106
(617) 913-0342
jasonmarshall@nescoe.com

Attorneys for the New England States
Committee on Electricity, Inc.

**Connecticut Department of Energy
and Environmental Protection:**

/s/ Robert Snook

Robert Snook, AAG
Office of the Attorney General
Ten Franklin Square
New Britain, CT 06051
(860) 827-2657
Robert.Snook@ct.gov

Attorney for the Connecticut Department
of Energy and Environmental Protection

**Connecticut Public Utilities
Regulatory Authority:**

/s/ Clare Kindall

Clare Kindall, AAG
Department Head – Energy
Office of the Attorney General
Ten Franklin Square
New Britain, CT 06051
(860) 827-2683
Clare.kindall@ct.gov

Attorney for the Connecticut Public
Utilities Regulatory Authority

**Massachusetts Department of Public
Utilities:**

Cecile M. Fraser, Counsel
Jeffrey M. Leupold, Senior Counsel
Massachusetts Department of Public
Utilities
One South Station, Fifth Floor
Boston, MA 02110
(617) 305-3621
Cecile.Fraser@state.ma.us
jeffrey.Leupold@state.ma.us

Attorneys for the Massachusetts
Department of Public Utilities

**New Hampshire Public Utilities
Commission:**

/s/ F. Anne Ross
F. Anne Ross
General Counsel
New Hampshire Public Utilities
Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429
(603) 271-2431
f.anne.ross@puc.nh.gov

Attorney for the New Hampshire Public
Utilities Commission

**Rhode Island Public Utilities
Commission:**

/s/ Leo J. Wold

Leo J. Wold
Assistant Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400, ext. 2218
lwold@riag.ri.gov

Attorney for the Rhode Island Public
Utilities Commission

**Vermont Department of Public
Service:**

/s/ Edward McNamara

Edward McNamara
Regional Policy Director
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620
(802) 828-4007
ed.mcnamara@state.vt.us

Attorney for the Vermont Department of
Public Service

May 15, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have served by first-class mail, postage prepaid, and/or by electronic mail, a copy of the foregoing Petition for Review and Disclosure Statement upon each of the parties to Federal Energy Regulatory Commission Docket Nos. ER13-193-000, ER13-196-000, ER13-193-001, ER13-193-003, ER13-196-001 and ER13-196-003, as identified on the service lists maintained for these proceedings by the Secretary of the Commission as shown on the attached lists.

I also hereby certify that I have served via hand delivery two (2) copies of the attached Petition for Review, accompanying orders, and Corporate Disclosure Statement on the Solicitor of the Federal Energy Regulatory Commission and one (1) copy of the attached Petition for Review, accompanying orders, and Corporate Disclosure Statement on the Secretary of the Federal Energy Regulatory Commission.

Dated this 15th day of May, 2015, at Washington DC.

A handwritten signature in black ink, appearing to read "Phyllis G. Kimmel", written over a horizontal line.

Phyllis G. Kimmel
McCarter & English, LLP
1015 Fifteenth Street, N.W.
Twelfth Floor
Washington, DC 20005
(202) 753-3400

Attorney for the New England States
Committee on Electricity, Inc.

Solicitor of the Federal Energy Regulatory Commission:

Mr. Robert H. Solomon, Solicitor
Office of the Solicitor
Federal Energy Regulatory Commission
888 First Street, N.E.
Room 9A-01
Washington, D.C. 20426

Secretary of the Federal Energy Regulatory Commission:

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, D.C. 20426

**SERVICE LISTS FOR DOCKET NOS. ER13-193-000, ER13-196-000,
ER13-193-001, ER13-193-003, ER13-196-001 AND ER13-196-002**

Eugene Grace
Regulatory Attorney
1501 M St NW, Suite 1000
Washington, DC 20005
ggrace@awea.org

Phyllis Kimmel
McCarter & English, LLP
1015 15th Street, NW
12th Floor
Washington, DC 20005
pkimmel@mccarter.com

John Adragna
Partner
McCarter & English, LLP
Twelfth Floor
1015 15th Street, N.W.
Washington, DC 20005
Jadragna@mccarter.com

John Coyle
Duncan & Allen
1730 Rhode Island Avenue, N.W. Suite 700
Washington, DC 20036-3115
jpc@duncanallen.com

Toan-Hao Nguyen
Senior Counsel
Iberdrola Renewables, Inc.
1125 NW Couch, Suite 700
Portland, OREGON 97209
toan.nguyen@iberdrolaren.com

Agnes Gormley
Maine Public Advocate Office
112 State House Station
Augusta, MAINE 04333
agnes.gormley@maine.gov

Eric Runge Counsel
Day Pitney LLP
One International Place
Boston, MASSACHUSETTS 02110
ekrunge@daypitney.com

Lisa Gast
Attorney
Duncan, Weinberg, Genzer & Pembroke PC
1615 M Street Suite 800
Washington, DC 20036
lsg@dwgp.com

Scott Strauss
Spiegel & McDiarmid LLP
1875 Eye Street NW Suite 700
Washington, DC 20006
Scott.Strauss@spiegelmc.com

Vilna Gaston
Assoc. Gen. Regulatory Counsel
PSEG Services Corporation
80 Park Plaza, T5G
Newark, NEW JERSEY 07102
Vilna.Gaston@PSEG.com

G. Philip Nowak Partner
Akin Gump Strauss Hauer & Feld LLP
1333 New Hampshire Avenue, N.W.
Robert S. Strauss Building
Washington, DC 20036
pnowak@akingump.com

Abraham Silverman
Sr. Counsel - Regulatory
NRG Energy, Inc.
211 Carnegie Center Drive
Princeton, NEW JERSEY 08540
abe.silverman@nrgenergy.com

Lisa Fink
Senior Staff Attorney
Maine Public Utilities Commission
18 State House Station
Augusta, MAINE 04333
lisa.fink@maine.gov

Robert Luysterborghs
Connecticut Department of Public Utility Control
10 Franklin Square
New Britain, CONNECTICUT 06051
robert.luysterborghs@po.state.ct.us

Thomas Bessette
Senior Counsel
Massachusetts Department of Public Utilities
One South Station
Boston MA, MASSACHUSETTS 02199
Thomas.Bessette@state.ma.us

Alexander Speidel
Staff Attorney
New Hampshire Public Utilities Commission
21 S. Fruit Street Suite 10
Concord, NEW HAMPSHIRE 03301
alexander.speidel@puc.nh.gov

Amanda Conner
Senior Counsel
American Electric Power Service Corporation
801 Pennsylvania Ave NW Suite 320
Washington, DC 20004
arconner@aep.com

Clare Kindall
Assistant Attorney General
Office of Attorney General
10 Franklin Square
New Britain, CONNECTICUT 06051
Clare.Kindall@ct.gov

Cortney Madea
Sr. Regulatory Counsel
NRG Companies
211 Carnegie Center
Princeton, NEW JERSEY 08540
cortney.madea@nrgenergy.com

Cynthia Arcate
President & CEO
POWEROPTIONS INC
129 South Street - 5th Floor
Boston, MASSACHUSETTS 02111
carcate@poweroptions.org

David Doot
Day Pitney LLP
242 Trumbull Street
Hartford, CONNECTICUT 06103
dtdoot@daypitney.com

Edward McNamara
Regional Policy Director
Vermont Department of Public Service
112 State Street
Montpelier, VERMONT 05620
ed.mcnamara@state.vt.us

Greg Cunningham
Senior Staff Attorney
Conservation Law Foundation
47 Portland Street Suite 4
Portland, MAINE 04101
gcunningham@clf.org

Gunnar Birgisson
Senior Attorney
NextEra Energy Resources, LLC
801 Pennsylvania Ave., N.W. Suite 220
Washington, DC 20004
gunnar.birgisson@nee.com

Jamie Tosches
Assistant Attorney General
Massachusetts Office of Attorney General
205B Lowell St
Wilmington, MASSACHUSETTS 01887
jamie.tosches@state.ma.us

Jason Gray
Associate
Duncan, Weinberg, Genzer & Pembroke PC
1615 M Street, N.W. Suite 800
Washington, DC 20036
jtg@dwgp.com

Joseph Nelson
Member
Van Ness Feldman, LLP
1050 Thomas Jefferson St, NW; Ste 700
Washington, DC 20007
jbn@vnf.com

Joseph Rosenthal
Litigation Attorney
Connecticut Office of Consumer Counsel
Office of Consumer Counsel
Ten Franklin Square
New Britain, CONNECTICUT 06051
joseph.rosenthal@ct.gov

Karen Holyoke
Vice President, Corporate & Le
Bangor Hydro Electric Company
970 Illinois Avenue
Bangor, MAINE 04401
kholyoke@bhe.com

Karen O'Neill
VP General Counsel & Corp. Sec
Vermont Electric Power Company, Inc.
366 Pinnacle Ridge Road
koneill@velco.com

Kathleen Barron
Senior Vice President
Exelon Corporation
101 Constitution Ave, NW Suite 400 East
Washington, DC 20001
kathleen.barron2@exeloncorp.com

Mark LeBel
Staff Attorney
101 Tremont Street, Suite 401
Boston, MASSACHUSETTS 02108
mlebel@acadiacenter.org

Mary Jo Krolewski
Vermont Public Service Board
112 State Street 4th Floor
Montpelier, VERMONT 05620-2701
mary-jo.krolewski@state.vt.us

Michael Engleman
Patton Boggs LLP
2550 M St. NW
Washington, DC 20037
michael.engleman@squirepb.com

Peter Fuller
NRG Energy, Inc.
270 Cherry Street
Bridgewater, MASSACHUSETTS 02324
peter.fuller@nrgenergy.com

Richard Meyer
Senior Regulatory Counsel
National Rural Electric Cooperative Association
4301 Wilson Blvd
Arlington, VIRGINIA 22203
richard.meyer@nreca.coop

Robert Mahoney
Deputy General Counsel
Iberdrola USA Management Corporation
Durham Hall
52 Farm View Drive
New Gloucester, MAINE 04260
scott.mahoney@iberdrolausa.com

Robert Snook
Connecticut Department of Energy and Environmental Protection
10 Franklin Square
New Britain, CONNECTICUT 06106
robert.snook@ct.gov

Rorie Hollenberg
Staff Attorney
N.H. Office of Consumer Advocate
21 S. Fruit St. Ste. 18
Concord, NEW HAMPSHIRE 03301
rorie.e.p.hollenberg@oca.nh.gov

Sean Atkins Partner
Alston & Bird LLP
950 F St NW
The Atlantic Building
Washington, DC 20004
sean.atkins@alston.com

Theodore Paradise
Senior Regulatory Counsel
ISO New England Inc.
1 Sullivan Rd
Holyoke, MASSACHUSETTS 01040
tparadise@iso-ne.com