

# ORGANIZATION OF PJM STATES, INC.

<b>Members:</b> Delaware Public Service Commission District of Columbia Public Service Commission Illinois Commerce Commission Indiana Utility Regulatory Commission Kentucky Public Service Commission Maryland Public Service Commission Michigan Public Service Commission New Jersey Board of Public Utilities North Carolina Utilities Commission Public Utilities Commission of Ohio Pennsylvania Public Utility Commission Tennessee Regulatory Authority Virginia State Corporation Commission Public Service Commission of West Virginia		<b>Executive Committee Members:</b> Wendell F. Holland, President Laura Chappelle, Vice President Mark David Goss, Secretary Allen M Freifeld, Treasurer Agnes A. Yates
---	--	--

November 2, 2005

Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426  
(by Electronic Filing)

**Re: PJM Interconnection, L.L.C., Docket No. ER06-78-000;** Motion for Intervention on behalf of the Organization of PJM States, Inc.

Dear Ms. Salas:

Please accept for filing in the above-referenced matter an electronically filed motion for intervention on behalf of the Organization of PJM States, Inc. Service has been made upon the service list as evidenced by the attached certificate of service.

Thank you for your attention to this matter. If you have any questions in reference to this filing, please contact me at 717-787-5978.

Sincerely,

s/ John A. Levin  
John A. Levin, Assistant Counsel  
Pennsylvania Public Utility Commission

Enclosures

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

**PJM Interconnection, L.L.C.**

**ER06-78-000**

---

**MOTION OF THE ORGANIZATION OF PJM STATES, INC.  
FOR LEAVE TO INTERVENE**

---

The Organization of PJM States, Inc.<sup>1</sup>, hereby timely moves your Commission for leave to intervene, pursuant to Rules 214 (a) (2) and (b) of the rules of practice and procedure of your Commission.

1. All communications with respect to this matter should be addressed as follows:

John A. Levin, Assistant Counsel  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265  
**email:** johlevin@state.pa.us [please note spelling]

---

<sup>1</sup> The Organization of PJM States, Inc. (“OPSI”) is a Delaware non-stock corporation with membership drawn from all 14 state regulatory commissions within the footprint of PJM Interconnection. OPSI is organized for the purpose of providing a regional forum for state regulatory authorities on issues affecting the region’s wholesale electricity market. Its board of directors, which is comprised of one Commissioner from each member state, has authorized this intervention to express the Organization’s views. No vote of, or resolution passed by the Board of Directors has any binding effect upon any state regulatory authority or any individual member thereof in the exercise of such authority’s powers. Actions or positions taken by OPSI do not constitute official actions or positions of any individual member regulatory authority.

## MOTION FOR LEAVE TO INTERVENE

1. On October 28, 2005, PJM Interconnection, L.L.C. filed revisions of its Electric Tariff, pursuant to Section 205 of the Federal Power Act, adding provisions for the purpose of funding the Organization of PJM States, Inc..
2. Your Commission has not yet issued a notice of the filing, nor has it yet set a comment due date.
3. OPSI is an organization of the state utility regulatory commissions created by the legislatures of their respective states<sup>2</sup> and charged with the regulation of electric utilities and of generation suppliers where retail electric generation competition has been authorized.
4. OPSI, in support of the public interest in safe, adequate and reliable electric service at just and reasonable rates, desires to intervene in the above captioned matters. As an organization comprised of all of the state utility regulatory agencies within the PJM regional footprint, OPSI has a unique

---

<sup>2</sup> State commissions that are current members of OPSI are:

Delaware Public Service Commission  
District of Columbia Public Service Commission  
Illinois Commerce Commission  
Indiana Utility Regulatory Commission  
Kentucky Public Service Commission  
Maryland Public Service Commission  
Michigan Public Service Commission  
New Jersey Board of Public Utilities  
North Carolina Utilities Commission  
Public Utilities Commission of Ohio  
Pennsylvania Public Utility Commission  
Tennessee Regulatory Authority  
Virginia State Corporation Commission  
Public Service Commission of West Virginia

interest in this proceeding. Each of our member Commissions have a vital interest in the effect on wholesale and retail markets and grid reliability and is committed to working together on regional issues affecting wholesale electricity markets. Each of our member commissions has been delegated individual statutory responsibilities in the regulation of their State's retail electricity sector and has a statutory obligation to protect the public interest in safe, adequate and reliable electric service at just and reasonable rates, as well as the establishment of effective and fair wholesale markets. OPSI is the organization funded pursuant to these proposed tariff provisions, and thus no other party is able to adequately represent OPSI's unique interest in this proceeding.

5. OPSI asks your Commission to grant its motion for leave to intervene in the above captioned docket.

WHEREFORE, OPSI respectfully asks that your Commission allow its intervention in the above matter.

Respectfully Submitted,

s/ John A. Levin

John A. Levin

Assistant Counsel

Pennsylvania Public Utility Commission

P.O. Box 3265

Harrisburg, PA 17105-3265

**(for the Organization of PJM States, Inc.)**

Dated: September 16, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each party designated on the official service list compiled by the Secretary in Docket No. ER06-78-000 in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated this 2<sup>nd</sup> day of November, 2005.

s/ John A. Levin  
John A. Levin, Assistant Counsel  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265  
(717) 787-5978  
johlevin@state.pa.us

For the Organization of PJM States

Document Content(s)

OPSI\_Funding\_Int.DOC.....1