



## Organization of PJM States, Inc. (OPSI)

President: **Mark C. Christie** (Commissioner, Virginia SCC)

Vice President: **Lula Ford** (Commissioner, Illinois CC)

Secretary: **Allen M. Freifeld** (Commissioner, Maryland PSC)

Treasurer: **Dallas Winslow** (Commissioner, Delaware PSC)

*Members: 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 Utility Commission, Public Utility Commission of Ohio, Pennsylvania Public Utility Commission, Tennessee Regulatory Authority, Virginia State Commerce Commission, and West Virginia Public Service Commission.*

Executive Director: Rajnish Barua, Ph.D.

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April 30, 2007

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

**Re: Allegheny Electric Cooperative, Inc. Borough of Chambersburg, Pennsylvania; City and Towns of Hagerstown, Thurmont, and Williamsport, Maryland; District of Columbia Office of the People's Counsel; Illinois Citizens Utility Board; Indiana Office of Utility Consumer Counsel; Maryland Office of People's Counsel; New Jersey Division of Rate Counsel; Office of the Attorney General of Virginia, Division of Consumer Counsel; Office Of the Ohio Consumer's Counsel; Old Dominion Electric Cooperative; Pennsylvania Office of Consumer Advocate; PJM Industrial Customer Coalition; Southern Maryland Electric Cooperative, Inc.; State of Delaware, Division Of the Public Advocate, Docket No. EL07-56-000; Motion to Intervene of the Organization of PJM States, Inc.**

Dear Secretary Bose:

Please accept for filing in the above-referenced matter an electronically filed Motion to Intervene in the above captioned matter by the Organization of PJM States, Inc. ("OPSI").

Service of this motion has been made in accordance with the Commission's rules 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

For: The Organization of PJM States, Inc.

Enclosures

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

<b>Allegheny Electric Cooperative, Inc.</b>	:	
<b>Borough of Chambersburg,</b>	:	
<b>Pennsylvania; City and Towns of</b>	:	
<b>Hagerstown, Thurmont, and</b>	:	
<b>Williamsport, Maryland; District of</b>	:	
<b>Columbia Office of the People’s</b>	:	<b>Docket No. EL07-56-_____</b>
<b>Counsel; Illinois Citizens Utility</b>	:	
<b>Board; Indiana Office of Utility</b>	:	
<b>Consumer Counsel; Maryland Office</b>	:	
<b>of People’s Counsel; New Jersey</b>	:	
<b>Division of Rate Counsel; Office of</b>	:	
<b>the Attorney General of Virginia,</b>	:	
<b>Division of Consumer Counsel;</b>	:	
<b>Office Of the Ohio Consumer’s</b>	:	
<b>Counsel; Old Dominion Electric</b>	:	
<b>Cooperative; Pennsylvania Office of</b>	:	
<b>Consumer Advocate; PJM Industrial</b>	:	
<b>Customer Coalition; Southern</b>	:	
<b>Maryland Electric Cooperative, Inc.;</b>	:	
<b>State of Delaware, Division Of the</b>	:	

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

Pursuant to Rules 211 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (FERC or Commission), the Organization of PJM States, Inc. (“OPSI”)<sup>1</sup> request leave to intervene in the instant proceeding.

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<sup>1</sup> The members of OPSI are the: 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; and the Public Service Commission of West Virginia.

On April 17, 2007, the above- captioned Joint Complainants filed a complaint pursuant to sections 205 and 206 of the Federal Power Act, 16 USC § 824d and §824e (2006) and Rule 206 of Commission's Rules of Practice and Procedure, 18 CFR § 385.206, requesting a Show Cause Order and assurances from PJM Interconnection, L.L.C. that it has not violated, and will not violate, its tariff requirements pertaining to market monitoring. Your Commission noticed this filing with a response date of April 30, 2007.

### **I. MOTION TO INTERVENE**

OPSI is, as noted above, an incorporated association of all 14 State Commissions within the PJM footprint. As a voluntary regionally based organization of State regulators, OPSI has a unique, direct and substantial interest in this proceeding that cannot be represented by any other party. The fourteen OPSI state regulatory commissions that together participate in OPSI have a unique stake in the operation and success of the PJM wholesale markets. OPSI therefore asks that this motion to intervene be granted

### **II. SERVICE**

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

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Assistant Counsel  
Pennsylvania Public Utility Commission  
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For the Organization of PJM States, Inc.

### III. CONCLUSION

WHEREFORE, for the reasons appearing above, OPSI requests that this Motion to Intervene be granted.

Respectfully Submitted,

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](mailto:johlevin@state.pa.us)

For the Organization of PJM States, Inc.

Dated: April 30, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document in accordance with the requirements of the Commission's Rules of Practice and Procedure.

Dated at Harrisburg, Pennsylvania this 30rd day of April, 2007.

s/ John A. Levin

John A. Levin

Assistant Counsel

Pennsylvania Public Utility Commission

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