

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

62 N. Chapel Street, Suite 203, Newark, DE 19711 • Tel: 302- 266-0914 • www.opsi.us

Commissioner Lula Ford (Illinois Commerce Commission) - **President****Commissioner Sam J. Ervin, IV** (North Carolina Utilities Commission) - **Secretary****Commissioner Dallas Winslow** (Delaware Public Service Commission) - **Treasurer**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 Utilities Commission
Public Utilities Commission of Ohio • Pennsylvania Public Utility Commission • Tennessee Regulatory Authority
Virginia State Corporation Commission • Public Service Commission of West Virginia.

September 4, 2008

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

Re: Docket No. EL08-47-000
PJM Interconnection, L.L.C.

Dear Secretary Bose:

Please accept for filing in the above-referenced matter an electronically filed Motion to Intervene Out-of-Time 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 302-266-0914.

Sincerely,
/s/ Rajnish Barua
Rajnish Barua
Executive Director
Organization of PJM States, Inc.

Enclosures

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

PJM Interconnection LLC

:

Docket No. EL08-47

**MOTION TO INTERVENE OUT-OF-TIME
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)¹ request leave to intervene out-of-time in the instant proceeding.

OPSI is an incorporated association of the utility regulatory agencies of 13 states and the District of Columbia (Member Regulatory Agencies) within the PJM footprint. As a voluntary regionally based organization of these 14 agencies, OPSI has a unique, direct, and substantial interest in this proceeding that cannot be represented by any other party. The Member Regulatory Agencies, which regulate numerous electric distribution utilities in each individual jurisdiction, together participate in OPSI and have a unique stake in the operation and success of the PJM wholesale markets. Since its formation, OPSI has participated in proceedings related to PJM before this Commission. OPSI also regularly participates in various meetings organized by PJM.

¹ The Member Regulatory Agencies 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

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

Rajnish Barua
Executive Director
Organization of PJM States, Inc.
62 N. Chapel Street, Suite 203
Newark, DE 19711
Tel. 302-266-0914
Email: raj@opsi.us

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

Respectfully Submitted,

Sincerely,
/s/ Rajnish Barua
Rajnish Barua
Executive Director
Organization of PJM States, Inc.
62 N. Chapel Street, Suite 203
Newark, DE 19711
Tel 302-266-0914
Email: raj@opsi.us

Dated: September 4, 2008

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 Newark, Delaware, this 4th day of September, 2008.

/s/ Rajnish Barua

Rajnish Barua
Executive Director
Organization of PJM States, Inc.
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