

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

Richard Blumenthal, Attorney General for The
State of Connecticut

Docket No. EL09-47-000

v.

ISO New England Inc., Brookfield Energy Marketing Inc.,
H.Q. Energy Services (U.S.) Inc., Constellation Energy
Commodities Group, Inc., and Other Unidentified Installed
Capacity Resources Committed to Import Over the Northern
New York AC Interface

The Connecticut Department of Public Utility Control and
the Connecticut Office of Consumer Counsel

Docket No. EL09-48-000

v.

ISO New England Inc., Brookfield Energy Marketing Inc.,
H.Q. Energy Services (U.S.) Inc., Constellation Energy
Commodities Group, Inc., and Other Unidentified Installed
Capacity Resources Committed to Import Over the Northern
New York AC Interface

**CONNECTICUT REPRESENTATIVES’
SECOND SET OF DATA REQUESTS TO ISO NEW ENGLAND INC.**

Pursuant to Rule 406 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.406, the Connecticut Department of Public Utility Control (“CT DPUC”), the Connecticut Office of Consumer Counsel (“CT OCC”) and Richard Blumenthal, Attorney General for the State of Connecticut (“CT AG”) (collectively, the “Connecticut Representatives”) submit the following Data Requests to ISO New England Inc. (“ISO-NE”).

Please provide all written and documentary responses as they become available, and in any case, not later than October 15, 2009. Pursuant to the Commission’s Rules

and the Presiding Judge's Order Establishing Procedural Schedule, notice of any objections to full compliance with these Data Requests should be given in writing as soon as reasonably possible, but not later than ten (10) business days after the receipt of these Data Requests.

The Connecticut Representatives request that ISO-NE provide three copies of the data and information specified below, one each to:

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Lisa Katz
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In responding to these requests, please apply the definitions and instructions in the Connecticut Representatives' First Set of Data Requests to ISO-NE, with the following additions and modifications.

INSTRUCTIONS

Modifications to Instructions

Q. Please also provide audio recordings in “.wav” or “.mp3” formats. For all audio recordings, provide a tab-delimited text file with at least the following fields: (i) audio file name; (ii) person calling; (iii) date of call; (iv) time of call; (v) duration of call; (vi) identification of line recorded; (vii) person or number called; and (viii) any other meta-data or bibliographical information associated with call records that is maintained in the ordinary course of business.

X. To the extent that responses to all requests cannot be completed by **October 15, 2009**, please provide a schedule for the expected completion date for each request.

Y. Responses to Data requests may also be delivered by hand.

Additional Instructions.

Z. Please provide electronic documents in the following format

- i) Each document and inclusive pages shall be Bates stamped or otherwise marked with unique sequential numbers that include the alphabetical prefix set forth in **Instruction W** to the Connecticut Representatives’ First Set of Data Requests.
- ii) Please provide all documents scanned or processed and delivered as single page group 4 TIFF images with an accompanying cross reference load file in Concordance or Summation format. Along with the cross referenced file to the images, please include the following coded data be delivered in a delimited text file:

Description	Field Name
First Page Bates Number	BeginDoc#
Last Page Bates Number	EndDoc#
Attachment (First Page Bates Number of parent document)	Attachmt
The type of communication or document	DocType
Document Title or Description	DocTitle
The date of the communication or document	DocDate
The author(s) and Organization (Name/Organization)	Author
The recipient(s) and Organization	Recip
Any other recipient(s) and organization	CC
Response to Data Request Number	RespNum

- iii) For the delimited text files in the above instructions, the field names shall be the first line and the following delimiters shall be used:

- “□” (ASCII 20) Field Separator
- “p” (ASCII 254) Text Delimiter
- “®” (ASCII 174) New Line Character within a field.
- “,” (ASCII 59) Multi Entry Delimiter

- iv) When producing native files, please include the native file name in the Concordance or Summation load file.
- v) Please deliver OCR text in a separate OCR folder. The OCR text should be in the format of one text file per document. Please supply an OCR text load file as a separate delimited text file.

DATA REQUESTS

- CT/ISO 2-1.** For the period beginning December 1, 2006 through August 31, 2009, please provide by month the total quantity in megawatts of (a) Installed Capacity provided by ICAP Resources as described in Section III.8.1 of the Market Rules, (b) Installed Capacity provided by ICAP Import Contracts, and (c) Installed Capacity provided by entities holding ICAP Import Contracts over the Northern New York AC Interface.
- CT/ISO 2-2.** Please provide the communications between capacity importers’ in-house personnel or outside counsel regarding the filings made by ISO-NE in Docket Nos. ER090873-000, EL09-47-00, and EL09-48-000, as referenced in ISO-NE’s response to S/ISO-NE 1-6.
- CT/ISO 2-3.** Please provide in a narrative format an explanation of how Market Participants seeking to import capacity over the Northern NY AC Interface request ICAP Import Rights, and provide citations to the relevant Market Rules, Manuals, Operating Procedures or other procedures.
- CT/ISO 2-4.** Please provide an Excel spreadsheet containing the following data with respect to ICAP Import Rights over the Northern NY AC Interface separately for each month from December 1, 2005, through August 31, 2009,
 - i. the available quantity in megawatts of External ICAP Import Rights; and
 - ii. the available quantity in megawatts of External ICAP Import Rights available after subtracting grandfathered or otherwise reserved import rights.
- CT/ISO 2-5.** Please provide an Excel spreadsheet containing, separately for each month from December 1, 2005, through August 31, 2009, the following data with

respect to ICAP Import Rights over the Northern New York AC Interface that are grandfathered or otherwise reserved import rights,

- i. the name of each entity granted an External ICAP Import Right that is a grandfathered right, the entity's resource associated with the grandfathered right, and the quantity in megawatts of grandfathered right(s) associated with each resource; and
- ii. the name of each entity granted an External ICAP Import Right that is a reserved import right, the entity's resource associated with the reserved import right, and the quantity in megawatts of reserved import right(s) associated with each resource.

CT/ISO 2-6. Please provide an Excel spreadsheet containing, separately for each month from December 1, 2005, through August 31, 2009, the following data with respect to ICAP Import Rights over the Northern New York AC Interface that are *not* grandfathered or otherwise reserved import rights,

- i. the name of the entity and the entity's resource associated with the External ICAP Import Right, and
 1. the megawatts of External ICAP Import Rights requested; and
 2. the megawatts of External ICAP Import Rights granted.
- ii. the total quantity in megawatts of External ICAP Import Rights held by each entity.

CT/ISO 2-7. To the extent not provided in S/ISO 1-6, please provide (a) all communications from Market Participants requesting ICAP Import Rights and (b) all communications notifying Market Participants that "ICAP Import Rights" are unavailable on the Northern NY AC Interface.

Date: October 1, 2009

/s/
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/s/

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Counsel for Richard Blumenthal, Attorney General
for the State of Connecticut

CERTIFICATE OF SERVICE

In accordance with 18 C.F.R. § 385.2010 (2009), I hereby certify that I have this day served, via electronic mail or first class mail, the foregoing document upon each person designated on the official service list compiled by the Secretary in these proceedings.

Dated at Washington, D.C. on this 1st day of October, 2009.

/s/

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