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March 1, 2010

VIA ELECTRONIC FILING

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

Re: Glacial Energy of New England; Docket No. ER10-725-000
Comments of the New England Power Pool Participants Committee

Dear Secretary Bose:

Attached for filing in the above-captioned proceeding are the comments of the New England Power Pool (“NEPOOL”) Participants Committee. Please contact me if you have any questions or need any further information regarding this filing.

Respectfully submitted,

Jennifer E. Galiette,
Counsel to the NEPOOL Participants
Committee

cc: Glacial Energy of New England
ISO New England Inc.

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

Glacial Energy of New England)

Docket No. ER10-725-000

**COMMENTS OF
NEW ENGLAND POWER POOL PARTICIPANTS COMMITTEE**

(March 1, 2010)

Pursuant to Rule 212 of the Commission's¹ Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2010), the New England Power Pool ("NEPOOL") Participants Committee² files these comments in the captioned docket.³ The captioned docket was initiated by the February 3, 2010 filing by Glacial Energy of New England ("Glacial Energy") notifying the Commission of the non-conforming amendment to its existing Letter of Credit (the "Letter of Credit") posted with ISO New England Inc. ("ISO-NE").

I. BACKGROUND & COMMENTS

The ISO-NE Financial Assurance Policy⁴ (the "Policy") stipulates that any letter of credit posted pursuant to the Policy should generally follow the form included as an exhibit to the

¹ Capitalized terms used but not defined in this filing are intended to have the meanings given to such terms in the Second Restated New England Power Pool Agreement (the "Second Restated NEPOOL Agreement"), the Participants Agreement, or the ISO New England Inc. Transmission, Markets and Services Tariff ("ISO-NE Tariff").

² NEPOOL is a voluntary association organized in 1971 pursuant to the New England Power Pool Agreement, and it has grown to include more than 410 members. The Participants include all of the electric utilities rendering or receiving services under the ISO-NE Tariff, as well as independent power generators, marketers, load aggregators, brokers, consumer-owned utility systems, demand response providers, developers, end users and a merchant transmission provider. Pursuant to revised governance provisions accepted by the Commission in *ISO New England Inc. et al.*, 109 FERC ¶ 61,147 (2004), the Participants act through the NEPOOL Participants Committee. The NEPOOL Participants Committee is authorized by Section 6.1 of the Second Restated NEPOOL Agreement and Section 8.1.3(c) of the Participants Agreement to represent NEPOOL in proceedings before the Commission. NEPOOL is the principal stakeholder organization for the New England RTO.

³ NEPOOL timely moved to intervene in the above-captioned docket by document-less intervention.

⁴ Attachment 2 to Exhibit IA of ISO-NE Tariff.

Policy, unless ISO-NE approves a variation after consultation with the NEPOOL Budget and Finance Subcommittee (the “Subcommittee”). The amendment posted by Glacial Energy on January 12, 2010 (the “Amendment”) to its existing Letter of Credit included non-conforming language referencing a third party. That non-conforming language was presented to the Subcommittee at its January 11, 2010 meeting, along with related confidential information. After reviewing those materials, the Subcommittee did not object to the addition of a reference to the third party in the Letter of Credit in this instance.

VI. RELIEF REQUESTED

WHEREFORE, for the reasons stated herein, the NEPOOL Participants Committee requests that the Commission consider these comments and accept the Amendment to the Letter of Credit.

Respectfully submitted,

NEPOOL Participants Committee

By: _____

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Its Attorney

Dated: March 1, 2010

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with the Combined Notice of Filings #1 issued February 23, 2010, I have this day served the foregoing document electronically upon Glacial Energy of New England and ISO New England Inc.

Dated at Hartford, Connecticut this 1st day of March, 2010.

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