

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

ISO New England, Inc.

Docket No. ER20-739-000

**MOTION TO INTERVENE
OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission's ("Commission's") Rules of Practice and Procedure, 18 C.F.R. § 385.214, the Retail Energy Supply Association ("RESA")¹ hereby files this Motion to Intervene in the above-referenced proceeding, in which ISO New England, Inc. ("ISO-NE") seeks to modify its Tariff to add a compensation mechanism for transmission facilities needed for reliability. In support of this Motion to Intervene, RESA submits as follows:

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

**I.
MOTION TO INTERVENE**

A. Correspondence and Communications

Correspondence and communications regarding this matter should be addressed to the following person(s), and the same should also be designated for service on the Commission's official list for this proceeding:

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B. RESA

RESA is a non-profit trade association of independent corporations that are involved in the competitive supply of electricity. RESA and its members are actively involved in retail electricity markets throughout the United States, including retail markets in each of the Commission-approved RTO/ISOs. Many of RESA's members are active in ISO-NE markets.

C. Motion to Intervene

On January 6, 2020, ISO-NE filed to implement a new charge and Schedule to collect costs associated with facilities used to provide critical infrastructure protection. ISO-NE proposes to collect these costs from Network Load. RESA's members are active in ISO-NE markets and purchase services, including capacity in ISO-NE markets. RESA, therefore, has an interest in this proceeding that is not represented by any other party. RESA respectfully requests that its motion to intervene be granted.

WHEREFORE, RESA respectfully requests that its Motion to Intervene be granted.

Respectfully submitted,

Elizabeth W. Whittle

Elizabeth W. Whittle
Counsel to
The Retail Energy Supply Association

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Dated: January 22, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on each person listed on the Official Service list compiled by the Secretary in this proceeding.

Dated in Washington, DC this 22nd day of January 2020.

Elizabeth W. Whittle
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