

Text of the doc-less motion to intervene that NYISO e-filed at FERC on June 10, 2015, in Docket No. EL15-67-000.

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's (Commission) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 & 385.214 (2012), the New York Independent System Operator, Inc. ("NYISO") hereby moves to intervene in the above-captioned proceeding.

The NYISO is a not-for-profit corporation responsible for providing open-access transmission service and administering open and competitive wholesale markets in New York State. The NYISO maintains and implements an Open Access Transmission Tariff and a Market Administration and Control Area Services Tariff (collectively, the "Tariffs"). The NYISO is responsible for the reliable operation of the bulk electricity grid, and both short-term and long-term planning for the bulk power system in New York State. The NYISO is also responsible for the economic evaluation and scheduling of import offers and export bids between the New York Control Area ("NYCA") and neighboring Public Utilities, including PJM Interconnection, LLC ("PJM").

Linden VFT, LLC ("Linden VFT") owns and operates a merchant transmission facility that connects the PJM transmission system and the New York transmission system. The Linden VFT facility is capable of flowing 330 MWs between PJM and the NYISO with the NYISO evaluating bids for transactions over the facility in accordance with its Tariffs.

Accordingly, the NYISO has an interest in this proceeding. This interest cannot be adequately represented by any other party. The NYISO, therefore, should be permitted to intervene in this proceeding.