



May 10, 2010

VIA EMAIL

David Whiteley
Eastern Interconnection Planning Collaborative (“EIPC”)

Re: NEPOOL Additional Comments on EIPC Stakeholder Process

Dear Mr. Whiteley,

The New England Power Pool (“NEPOOL”) submits these comments to supplement the comments NEPOOL submitted on March 31 and April 14, 2010, and requests that you post them on the EIPC website. In NEPOOL’s view, the straw proposals that were discussed at the May 7, 2010 EIPC webinar, which were all minor variations of the EIPC straw proposal, have a major defect in that they fail to provide any mechanism to ensure regional representation on the Stakeholder Steering Committee (the “SSC”). The proposals do not provide for a seat for a regional stakeholder organization such as NEPOOL, nor do they guarantee in any way that a region will be represented on the SSC through the market participant sectors.

In its March 31 comments, NEPOOL noted the collaborative stakeholder process we have in New England and its success in keeping New England at the forefront of regional system planning and market development matters. NEPOOL’s March 31 comments recommended that the EIPC straw proposal be improved by modifying it in ways that allow for the collective interests of a distinct region’s stakeholders to be expressed. We noted that one way to achieve this end would be to add one seat to the Stakeholder Steering Committee for each of the nine regions, and to designate each such seat to a representative of a regional stakeholder organization, such as NEPOOL for the New England region. In comments submitted on April 14, NEPOOL articulated certain principles that were important to see reflected in the SSC structure; namely, there should be: (i) an equal number of SSC representatives from each of the nine regions; and (ii) a balancing of business interests within each region. NEPOOL noted that regional input, in addition to industry sector input, will be critical to the success of the EIPC planning process and its output, because each region has particular rules, State policies, laws and regulations, circumstances, issues, constraints and objectives facing it that will need to be raised and reconciled on an inter-regional basis.

Despite our requests in these prior written comments and at the EIPC stakeholder meeting in St. Louis, the EIPC seems to have determined that it cannot or will not accommodate NEPOOL’s concern that there be regional representation at the SSC. While all regions might be represented in sector caucuses, that regional representation at the caucus level does not translate to a guarantee of regional representation at the SSC level. Nor does sector only representation at any level guarantee that collective regional market participant interests will be represented.

If the EIPC finalizes the SSC structure that was discussed during the May 7 webinar with the major defect in the SSC structure that we have identified, NEPOOL requests that the EIPC do the following at a minimum to help mitigate the adverse impact of that defect: *(i) ensure that there is time set aside at each SSC meeting for a representative of a regional stakeholder organization, such as NEPOOL, to have the opportunity to address the SSC and the issues under consideration; and (2) ensure that all written comments submitted to the SSC/EIPC are promptly posted on the EIPC website, so that all interested stakeholders may have access to them.* Additionally, adoption of those features of the SSC proposal supported by the Transmission Owners and Public Power that enhance the ability of regional representatives to participate in the SSC deliberations would also tend to lessen the adverse impact of the defect.

Very Truly Yours,

/s/

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