

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

<i>Constellation Energy Commodities</i>)	Docket No. IN12-7-000
<i>Group, Inc.</i>)	
)	
)	

**NEW ENGLAND PARTIES’
JOINT REQUEST FOR DISBURSEMENT**

On October 18, 2012, the Federal Energy Regulatory Commission (“FERC” or “Commission”) issued an Order Approving New England Parties’ Allocation and Distribution Proposal (“Order Approving Allocation”) in the above captioned docket. Paragraph 16 of the Order Approving Allocation permits the New England Parties¹ to file Requests for Disbursement from the disgorgement fund created by FERC’s March 9, 2012 Order Approving Stipulation and Consent Agreement. The New England Parties hereby request disbursement of the \$20 million of disgorgement funds allocated by FERC to the ISO New England region as set forth in more detail below.

In support of this request, the New England Parties state:

On September 10, 2012, the New England Parties submitted a “New England Agreement Regarding Allocation and Distribution of the \$20 Million Portion of the ISO-New England Disgorgement Fund” (“Joint Stipulation”). In its Order Approving Allocation, FERC found that the Joint Stipulation is fair and reasonable, and benefits

¹ The New England Parties are the Connecticut Public Utilities Regulatory Authority; the Connecticut Office of Consumer Counsel; George Jepsen, Attorney General for the State of Connecticut; the State of Maine Public Utilities Commission; the Massachusetts Department of Public Utilities; Martha Coakley, Attorney General of the Commonwealth of Massachusetts; the New Hampshire Public Utilities Commission; Peter F. Kilmartin, Attorney General of the State of Rhode Island; the Rhode Island Division of Public Utilities and Carriers; the Vermont Department of Public Service; the Massachusetts Municipal Wholesale Electric Company; the Eastern Massachusetts Consumer-Owned Systems; Groveland Municipal Light Department; and Merrimac Municipal Light Department.

consumers in the ISO-NE footprint, and is therefore approved. The Joint Stipulation adopts a methodology that allocates funds between the New England States based upon each state’s proportion of monthly energy² use within the ISO-NE Control Area, in kilowatt hours, over the period beginning September 1, 2007 and ending December 31, 2008. As set forth at paragraph 4 of the Joint Stipulation, ISO-NE would apply this agreed-to methodology using more refined data from its billing system.³ ISO-NE has completed its calculations, resulting in minor adjustments to the interstate allocation. The effects of these adjustments are shown in Attachments A and B.

The Joint Stipulation also included, in attached appendices, a statement or stipulation of each individual state’s proposed intrastate allocation and process for distribution of the funds. Under the intrastate agreements, all disgorgement funds are to be released to ISO-NE for disbursement to load serving entities, with two exceptions. Both the Massachusetts Municipal Wholesale Electric Company (“MMWEC”) and the Vermont Electric Power Company (“VELCO”) will receive funds directly from FERC and will disburse to load serving entities. Consequently, only three disbursements are required on the Commission’s part for all of New England.

The three distributions below reflect the effects of final adjustments:

ISO-NE	MMWEC	VELCO	Total
\$17,803,727.59	\$1,265,290.41	\$930,982.00	\$20,000,000

² Energy is defined as the load used in the settlement process.

³ To construct an interstate allocation methodology that FERC could approve as transparent, fair and reasonable, the Joint Stipulation utilized publicly available information from the website of ISO-NE. All parties understood that ISO-NE would calculate a final interstate allocation based upon more refined data from its internal billing system.

ISO-NE

The New England Parties, with the exception of MMWEC and the Vermont Department of Public Service, hereby designate ISO New England, Inc. to receive \$17,803,727.59 of disgorgement funds on their behalf. Cheryl Arnold, Director of Finance and Accounting, has been designated as the individual responsible to administer the funds for ISO New England, Inc. Funds disbursed to ISO-NE will be credited to load serving entities in accordance with Attachment B.

Massachusetts Municipal Wholesale Electric Company

MMWEC hereby requests a direct disbursement to it from FERC in the amount of \$1,265,290.41. As set forth in the Joint Stipulation (Appendix C, Section 4), the funds received by MMWEC shall be “disbursed through MMWEC to the Massachusetts municipal lighting plants[.]” Carol Martucci, MMWEC’s Director of Accounting and Financial Reporting, has been designated as the individual responsible to administer the funds allocated to MMWEC for disbursement to the municipally-owned lighting plants.⁴

Vermont Electric Power Company or VELCO

The Vermont Department of Public Service is the sole eligible entity for the State of Vermont, and hereby designates VELCO to receive \$930,982.00 in disgorgement funds on behalf of the Vermont load serving entities. Michele Nelson, Vice President of Finance and Treasurer, has been designated as the VELCO individual responsible to administer the funds disbursed to VELCO and for crediting the funds to load serving entities in accordance with Attachment C.

⁴ On October 22, 2012, MMWEC filed in this proceeding a request for disbursement. On October 25, 2012, MMWEC asked that action on its request be deferred pending consideration of data refinements circulated by ISO-NE. As MMWEC’s disbursement request has now been folded into the instant, “global” New England filing, MMWEC proposes that action approving the request contained herein be likewise considered to have addressed MMWEC’s October 22, 2012, request.

CONCLUSION

WHEREFORE, for the foregoing reasons, the New England Parties request disbursements from the disgorgement fund in the amounts set forth above.

/s/ Seth A. Hollander

Seth A. Hollander
Assistant Attorney General
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051
Tel: 860-827-2681
Fax: 860-827-2893
seth.hollander@ct.gov
For PUBLIC UTILITIES
REGULATORY AUTHORITY

/s/ Elin Swanson Katz

Elin Swanson Katz, Esq., Consumer
Counsel
Joseph A. Rosenthal, Esq.
Connecticut Office of Consumer Counsel
Ten Franklin Square
New Britain Connecticut 06051-2644
Phone: (860) 827-2900
Fax: (860) 827-2929
Elin.Katz@ct.gov
Joseph.Rosenthal@ct.gov
For CONNECTICUT OFFICE OF
CONSUMER COUNSEL

/s/ John S. Wright

John S. Wright
Michael C. Wertheimer
Assistant Attorneys General,
Attorney General's Office
10 Franklin Square
New Britain, CT 06051
Phone: 860-827-2620
Fax: 860-827-2893
For GEORGE JEPSEN
ATTORNEY GENERAL FOR THE
STATE OF CONNECTICUT,

/s/ Lisa Fink

Lisa Fink
Benjamin J. Smith
State of Maine Public Utilities Commission
101 Second Street
Hallowell, ME 04347
Mailing Address: 18 State House Station
Augusta, ME 04333-0018
(207) 287-1389 (telephone)
(207) 287-6343 (telephone)
lisa.fink@maine.gov
benjamin.j.smith@maine.gov
For MAINE PUBLIC UTILITIES
COMMISSION

/s/Thomas E. Bessette

Thomas E. Bessette
Massachusetts Department
of Public Utilities
Division of Regional and Federal Affairs
One South Station, Second Floor
Boston, MA 02110
Phone: 617-305-3629
Fax: 617-345-9103
E-mail: Thomas.Bessette@state.ma.us
For MASSACHUSETTS DEPARTMENT
OF PUBLIC UTILITIES

/s/ Patrick J. Tarmey

Patrick J. Tarmey
Assistant Attorney General
Massachusetts Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108-1598
Phone: 617.963.2577
Fax: 617.963.2998
For MARTHA COAKLEY
ATTORNEY GENERAL OF THE
COMMONWEALTH OF
MASSACHUSETTS

/s/ Lynn Fabrizio

Lynn Fabrizio
Staff Attorney
New Hampshire Public Utilities
Commission
21 South Fruit Street, Suite 10
Concord, NH 03301
lynn.fabrizio@puc.nh.gov
Tel: 603.271.6030
For NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

/s/ Leo J. Wold

Leo J. Wold
Assistant Attorney General
Rhode Island Department of Attorney
General
150 South Main Street
Providence, RI 02903
Tel: 401-274-4400, ext. 2218
Fax: 401-222-3016
lwold@riag.ri.gov
For PETER F. KILMARTIN
ATTORNEY GENERAL OF THE
STATE OF RHODE ISLAND
and RHODE ISLAND DIVISION OF
PUBLIC UTILITIES AND CARRIERS

/s/ Sheila Grace

Sheila Grace
Special Counsel, Public Advocacy Division
Vermont Department of Public Service
112 State Street
Montpelier, Vermont 05620-2601
(802) 828-3762
sheila.grace@state.vt.us
For VERMONT DEPARTMENT
OF PUBLIC SERVICE

Dated: November 16, 2012

/s/ Scott H. Strauss

Scott H. Strauss
Jeffrey A. Schwarz
Spiegel & McDiarmid LLP
1333 New Hampshire Ave. NW
Washington, D.C. 20036
Tel: (202)879-4000
Fax: (202) 393-2866
scott.strauss@spiegelmd.com
jeffrey.schwarz@spiegelmd.com
Counsel for Massachusetts Municipal
Wholesale Electric Company

/s/ John P. Coyle

John P. Coyle
Duncan & Allen
Suite 300
1575 Eye Street, N.W.
Washington, D.C. 20005-1175
Telephone: (202) 289-8400
Facsimile: (202) 289-8450
e-mail: jpc@duncanallen.com
Counsel for the Eastern Massachusetts
Consumer-Owned Systems (Braintree
Electric Light Department, Concord
Municipal Light Plant, Hingham Municipal
Lighting Plant, Middleton Electric Light
Department, Reading Municipal Light
Department, Wellesley Municipal Light
Plant, and Taunton Municipal Lighting
Plant), Groveland Municipal Light
Department and Merrimac Municipal Light
Department

CERTIFICATE OF SERVICE

I, Seth A. Hollander, hereby certify that on this day I caused the foregoing to be served via electronic mail or first class mail upon all parties identified on this agency's service list for this proceeding in accordance with 18 C.F.R. § 385.2010 (2012).

/s/ Seth A. Hollander
Seth A. Hollander

Dated: November 16, 2012

Attachment A

Final Interstate Allocation

	Proposed	Final	Difference
Maine	\$1,793,000	\$1,793,299	\$299
New Hampshire	\$1,792,000	\$1,791,963	\$(37)
Vermont	\$931,000	\$930,982	\$(18)
Connecticut	\$5,016,000	\$5,016,099	\$99
Rhode Island	\$1,288,000	\$1,288,273	\$273
Massachusetts	\$9,180,000	\$9,179,384	\$(616)
Total	\$20,000,000	\$20,000,000	0

Attachment B

Final Intrastate Allocations

	Intrastate Percentage	ISO Administered	MWEEC	VELCO
Maine				
Bangor Hydro	4.3832%	\$257,933.78		
Central Maine Power	85.6168%	\$1,535,365.22		
Total ME	100.00%			
New Hampshire				
Public Service of New Hampshire	72.1606%	\$1,293,091.25		
Unitil Electric Systems	11.0399%	\$197,830.92		
Granite State Electric	8.0673%	\$144,563.03		
New Hampshire Electric Cooperative	6.9996%	\$125,430.25		
Ashland*	0.1685%	\$3,019.46		
Littleton Water and Light	0.7149%	\$12,810.74		
New Hampton*	0.0274%	\$491.00		
Town of Wolfboro	0.6293%	\$11,276.82		
Woodsville**	0.1925%	\$3,449.53		
Total NH	100.00%			
Vermont				
VELCO	100.00%			\$930,982.00
Total VT	100.00%			
Connecticut				
Connecticut Light & Power	75.10%	\$3,767,090.35		
United Illuminating	18.36%	\$920,955.78		
Connecticut Municipal Electric Cooperative	6.54%	\$328,052.87		
Total CT	100.00%			

Rhode Island

Narragansett Electric Company	99.33641%	\$1,279,724.15
Pascoag Utility District	0.66538%	\$8,548.85
Total RI	100.00%	

Massachusetts

Fitchburg Gas & Electric	0.84%	\$77,111.03
Mass Electric	38.30%	\$3,516,133.09
Nantucket Electric***	0.26%	\$24,284.76
NSTAR	38.22%	\$3,508,765.67
Western Mass Electric Company	6.85%	\$628,693.72
Massachusetts Port Authority	0.36%	\$33,008.71
MATEP	0.64%	\$58,996.87
Mass Bay Transportation Authority	0.73%	\$67,099.74
MMWEC	13.78%	\$1,265,290.41
Total MA	100.00%	

TOTAL	\$17,803,727.59	\$1,265,290.41	\$930,982.00
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* Because this entity does not have a billing relationship with ISO-NE, ISO-NE will forward this entity's funds to VPPSA, who will in turn forward the funds to this entity.

** Because this entity does not have a billing relationship with ISO-NE, ISO-NE will forward this entity's funds to Green Mountain Power, who will in turn forward the funds to this entity.

*** Because this entity does not have a billing relationship with ISO-NE, Mass Electric will directly receive funds from ISO-NE on its behalf, and will forward all funds to this entity.

Attachment C

Vermont's Intrastate Allocation

Company	%	\$
Green Mountain Power Corporation*	33.46	\$311,506.58
Central Vermont Public Service Corporation*	40.06	\$372,951.39
Vermont Marble Power Division*	3.63	\$33,794.65
Town of Readsboro Electric Light Department*	0.04	\$372.39
Sub Total for Green Mountain Power	77.19	718,625.00
Barton Village, Inc. Electric Department	0.29	\$2,699.85
City of Burlington Electric Department	5.99	\$55,765.82
Village of Enosburg Falls Water & Light Department, Inc.	0.43	\$4,003.22
Town of Hardwick Electric Department	0.62	\$5,772.09
Village of Hyde Park Electric Department	0.22	\$2,048.16
Village of Jacksonville Electric Company	0.1	\$930.98
Village of Ludlow Electric Light Department	0.91	\$8,471.94
Village of Johnson Water & Light Department	0.27	\$2,513.65
Village of Lyndonville Electric Light Department	1.29	\$12,009.67
Village of Morrisville Water & Light Department	0.9	\$8,378.84
Village of Northfield Electric Department	0.52	\$4,841.11
Village of Orleans Electric Department	0.23	\$2,141.26
Town of Stowe Electric Department	1.42	\$13,219.94
Swanton Village, Inc. Electric Department	0.96	\$8,937.43
Vermont Electric Cooperative, Inc.	7.4	68,892.67
Washington Electric Cooperative, Inc.	1.26	\$11,730.37
Total	100.00	\$930,982.00

*Central Vermont Public Service Corporation, Vermont Marble Power Division, and Town of Readsboro Electric Light Department have been acquired by Green Mountain Power Corporation; thereby, Green Mountain Power Corporation should receive the combined share of those entities.