

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

<b>ISO-New England Inc.</b>	)	<b>Docket No. ER13-1851-002</b>
<b>and</b>	)	
<b>New England Power Pool</b>	)	
<b>Participants Committee</b>	)	

**MOTION TO INTERVENE AND COMMENTS OF  
THE NATURAL GAS SUPPLY ASSOCIATION**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.212 and 214, and in accordance with the Commission’s Notice, on August 12, 2013, the Natural Gas Supply Association (“NGSA”) hereby files this Motion to Intervene and Comments in response to ISO New England Inc.’s (“ISO-NE”) proposed emergency amendments to its pending filing regarding the Winter 2013-14 Reliability Program, filed on August 9, 2013, in the above-captioned proceeding (“Winter Proposal”). Such amendments were filed since ISO-NE’s first RFP solicitation for participation in the Winter Reliability Program failed to secure sufficient bids from eligible market participants.

NGSA is a trade association which represents integrated and independent companies that produce and market domestic natural gas. Established in 1965, NGSA encourages the use of natural gas within a balanced national energy policy, and promotes the benefits of competitive markets to ensure reliable and efficient transportation and delivery of natural gas and to increase the supply of natural gas to U.S. customers. Members of NGSA supply natural gas to power gas-fired generators and are impacted by policies that provide a preference to some resources over others in a discriminatory manner. For these reasons, the outcome of this proceeding will have a direct impact on NGSA and its members.

While supportive of ISO-NE's steps to ensure reliable electricity services in New England for this coming winter, NGSAs would like to support comments of other parties in this proceeding that ISO-NE must begin immediately to work with stakeholders to develop a long-term, resource-neutral solution that relies on market mechanisms to address New England's reliability concerns during the subsequent winter heating seasons.<sup>1</sup> As stated in comments filed by NEPGA, both NEPOOL stakeholders and ISO-NE have acknowledged that the Winter Proposal is an imperfect mechanism to maintain system reliability, in part because only certain types of resources are eligible to participate. Such an exclusive mechanism does not allow all resources to compete fairly in a non-discriminatory manner and could result in higher customer costs for reliability. In New England, gas-fired generation accounts for more than 40 percent of the market.<sup>2</sup> As such, there is no valid basis for excluding clean and abundant natural gas and LNG options out of the Winter Reliability Program.

Going forward, NGSAs believes that ISO-NE should take steps needed, without delay, to ensure that a fuel-neutral competitive process is fully operational for the winter of 2014-2015. The inability to secure enough bids for winter 2013-2014 in ISO-NE's first solicitation only highlights the importance of ensuring that future programs are fuel neutral. Therefore, the Commission should grant NEPGA's request that, as a condition to accepting the Winter Proposal, ISO-NE should be required to begin an expedited stakeholder process that provides sufficient time to adopt a mechanism that allows all economically competitive resources the opportunity to compete to supply

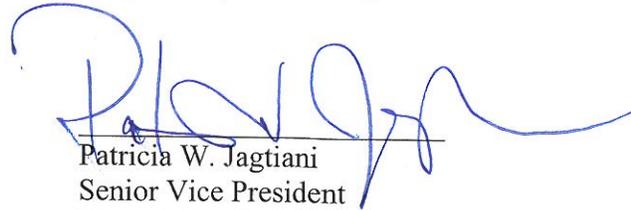
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<sup>1</sup> A number of parties have requested promptly initiating a stakeholder process including the New England Power Generators Association ("NEPGA"), Conservation Law Foundation ("CLF"), the New England States Committee on Electricity ("NESCOE"), the Electric Power Supply Association ("EPSA"), Exelon Corporation, TransCanada Power Marketing, Ltd., PSEG Services Corporation and Capital Power Corporation.

<sup>2</sup> See [http://www.iso-ne.com/nwsiss/grid\\_mkts/enrgy\\_srcs/](http://www.iso-ne.com/nwsiss/grid_mkts/enrgy_srcs/) 2012.

New England's winter reliability needs. Also, the Commission should require that any mechanism that ISO-NE uses to address conditions for subsequent winters be fuel neutral.

Respectfully Submitted,



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