

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

<b>New England Power Generators Association, Inc.,</b>	)	
	)	
	)	
<b>Complainant,</b>	)	
	)	
<b>v.</b>	)	<b>Docket No. EL14-17-000</b>
	)	
<b>ISO New England Inc.,</b>	)	
	)	
<b>Respondent.</b>	)	

**NOTICE OF WITHDRAWAL OF COMPLAINT OF  
THE NEW ENGLAND POWER GENERATORS ASSOCIATION, INC.**

Pursuant to Rule 216 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the “Commission”),<sup>1</sup> the New England Power Generators Association, Inc. (“NEPGA”)<sup>2</sup> respectfully submits this notice of withdrawal (this “Notice”), without prejudice, of its January 8, 2014 complaint<sup>3</sup> against ISO New England Inc. (“ISO-NE”) in the above-captioned proceeding. NEPGA submits this Notice in light of the January 27, 2014 announcement<sup>4</sup> that the owner of certain units at the Brayton Point Power Station (the “Brayton Point Units”) whose Non-Price Retirement Requests (“NPRRs”)<sup>5</sup> were rejected for reliability

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<sup>1</sup> 18 C.F.R. § 385.216 (2013).

<sup>2</sup> The positions set forth in this filing represent the position of NEPGA as an organization, but not necessarily the views of any particular member with respect to any issue.

<sup>3</sup> Complaint Requesting Fast Track Processing and Shortened Comment Period and Request for Tariff Waiver of the New England Power Generators Association, Inc., Docket No. EL14-17-000 (filed Jan. 8, 2014) (the “Complaint”).

<sup>4</sup> See Letter from David L. Schwartz to Kimberly D. Bose, Docket No. EL14-7-000 (filed Jan. 27, 2014).

<sup>5</sup> Capitalized terms not otherwise defined herein have the meaning set forth in ISO-NE’s Transmission, Markets & Services Tariff (the “Tariff”).

reasons has nonetheless elected to retire those units. As NEPGA has confirmed with ISO-NE, this election means that the capacity of the Brayon Point Units will not be counted towards the Installed Capacity Requirement (the “ICR”) in the Forward Capacity Auction (“FCA”) for the 2017/2018 Capacity Commitment Period (“FCA 8”), as it would have been if the owner had elected to keep the units in operation or had not yet made its election.

To be clear, NEPGA continues to believe that the Tariff provisions requiring that the capacity of resources whose NPRRs are rejected for reliability reasons be counted towards the ICR are unjust and unreasonable and ought to be reformed. With the decision to retire the Brayton Point Units, however, that immediate threat to FCA 8 has passed, and addressing this issue in time for the FCA for the 2018/2019 Capacity Commitment Period (“FCA 9”) should be sufficient. Consistent with its statements in this proceeding,<sup>6</sup> ISO-NE has authorized NEPGA to represent that ISO-NE intends to move forward with a stakeholder process to address these issues in time for FCA 9.

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<sup>6</sup> See Answer of ISO New England Inc. at 4-5, Docket No. EL14-17-000 (filed Jan. 17, 2014) (the “ISO-NE Answer”).



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on each person designated for service on the official service list compiled by the Secretary in this proceeding.

Dated at Washington DC, this 28<sup>th</sup> day of January, 2014.

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/s/  
Stephanie S. Lim