

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

Richard Blumenthal, Attorney General for The
State of Connecticut

Docket No. EL09-47-000

v.

ISO New England Inc., Brookfield Energy Marketing Inc.,
H.Q. Energy Services (U.S.) Inc., Constellation Energy
Commodities Group, Inc., and Other Unidentified Installed
Capacity Resources Committed to Import Over the Northern
New York AC Interface

The Connecticut Department of Public Utility Control and
the Connecticut Office of Consumer Counsel

Docket No. EL09-48-000

v.

ISO New England Inc., Brookfield Energy Marketing Inc.,
H.Q. Energy Services (U.S.) Inc., Constellation Energy
Commodities Group, Inc., and Other Unidentified Installed
Capacity Resources Committed to Import Over the Northern
New York AC Interface

**CONNECTICUT REPRESENTATIVES’
SECOND SET OF DATA REQUESTS TO ISO NEW ENGLAND INC.
INTERNAL MARKET MONITORING UNIT**

Pursuant to Rule 406 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.406, the Connecticut Department of Public Utility Control (“CT DPUC”), the Connecticut Office of Consumer Counsel (“CT OCC”) and Richard Blumenthal, Attorney General for the State of Connecticut (“CT AG”) (collectively, the “Connecticut Representatives”) submit the following Data Requests to the ISO New England Inc. Internal Market Monitoring Unit (“INTMMU”).

Please provide all written and documentary responses as they become available, and in any case, not later than October 15, 2009. Pursuant to the Commission's Rules and the Presiding Judge's Order Establishing Procedural Schedule, notice of any objections to full compliance with these Data Requests should be given in writing as soon as reasonably possible, but not later than ten (10) business days after the receipt of these Data Requests.

The Connecticut Representatives request that INTMMU provide three copies of the data and information specified below, one each to:

Randall L. Speck, Esq.
Kimberly Frank
Lisa Katz
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Washington, DC 20005
Tel.: (202) 682-3510
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In responding to these requests, please apply the definitions and instructions in the Connecticut Representatives' First Set of Data Requests to the INTMMU, with the following additions and modifications.

INSTRUCTIONS

Modifications to Instructions

Q. Please also provide audio recordings in “.wav” or “.mp3” formats. For all audio recordings, provide a tab-delimited text file with at least the following fields: (i) audio file name; (ii) person calling; (iii) date of call; (iv) time of call; (v) duration of call; (vi) identification of line recorded; (vii) person or number called; and (viii) any other meta-data or bibliographical information associated with call records that is maintained in the ordinary course of business.

X. To the extent that responses to all requests cannot be completed by **October 15, 2009**, please provide a schedule for the expected completion date for each request.

Y. Responses to Data requests may also be delivered by hand.

Additional Instructions.

Z. Please provide electronic documents in the following format

- i) Each document and inclusive pages shall be Bates stamped or otherwise marked with unique sequential numbers that include the alphabetical prefix set forth in **Instruction W** to the Connecticut Representatives' First Set of Data Requests.
- ii) Please provide all documents scanned or processed and delivered as single page group 4 TIFF images with an accompanying cross reference load file in Concordance or Summation format. Along with the cross referenced file to the images, please include the following coded data be delivered in a delimited text file:

Description	Field Name
First Page Bates Number	BeginDoc#
Last Page Bates Number	EndDoc#
Attachment (First Page Bates Number of parent document)	Attachmt
The type of communication or document	DocType
Document Title or Description	DocTitle
The date of the communication or document	DocDate
The author(s) and Organization (Name/Organization)	Author
The recipient(s) and Organization	Recip

Any other recipient(s) and organization
Response to Data Request Number

CC
RespNum

iii) For the delimited text files in the above instructions, the field names shall be the first line and the following delimiters shall be used:

- “□ ” (ASCII 20) Field Separator
- “p” (ASCII 254) Text Delimiter
- “®” (ASCII 174) New Line Character within a field.
- “;” (ASCII 59) Multi Entry Delimiter

iv) When producing native files, please include the native file name in the Concordance or Summation load file.

v) Please deliver OCR text in a separate OCR folder. The OCR text should be in the format of one text file per document. Please supply an OCR text load file as a separate delimited text file.

DATA REQUESTS

CT/INTMMU 2-1. Please provide documents relating to the email sent October 23, 2008 at 8:49 AM from Nicolas Bosse of Brookfield Renewable Power to John O'Connor and Allison DiGrande (and copying David LaPlante, Eric Dallaire, Vincent Francoeur, and Daniel Lapierre), which can be found at FERC00025367 - 68.

Date: October 1, 2009

/s/
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Counsel for Richard Blumenthal, Attorney General
for the State of Connecticut

CERTIFICATE OF SERVICE

In accordance with 18 C.F.R. § 385.2010 (2009), I hereby certify that I have this day served, via electronic mail or first class mail, the foregoing document upon each person designated on the official service list compiled by the Secretary in these proceedings.

Dated at Washington, D.C. on this 1st day of October, 2009.

_____/s/
Kimberly Frank
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(202) 682-3578