

VERMONT PUBLIC POWER SUPPLY AUTHORITY

5195 Waterbury-Stowe Road • P.O. Box 298 • Waterbury Ctr., VT 05677-0298
(802) 244-7678 Fax (802) 244-6889 www.vppsa.com

January 25, 2008

Susan M. Hudson, Clerk
Vermont Public Service Board
112 State Street, Drawer 20
Montpelier, VT 05620-2701


re: docket 7373
Joint Petition of Vermont Electric Power
Company, Inc., Vermont Transco, LLC and
Central Vermont Public Service Corporation for a
Certificate of public good, pursuant to 30 V.S.A. § 248,
Authorizing the construction of the Southern Loop
Transmission Upgrade Project

Dear Mrs. Hudson:

Enclosed please find a motion to intervene and a supporting memorandum on behalf of Vermont Power Supply Authority ("VPPSA") relative to the above matter, along with my notice of appearance.

Thank you for your consideration. Copies of these documents have been served on all parties on the Board's service list.

Very truly yours,


David John Mullett

cc: service list

STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No. 7373

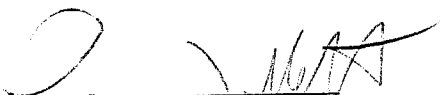
Joint Petition of Vermont Electric Power)
Company, Inc., Vermont Transco, LLC and)
Central Vermont Public Service Corporation for a)
Certificate of public good, pursuant to 30 V.S.A. § 248,)
Authorizing the construction of the Southern Loop)
Transmission Upgrade Project)

NOTICE OF APPEARANCE

Now comes David John Mullett, and enters his appearance on behalf of Vermont
Public Power Supply Authority ("VPPSA") in this matter.

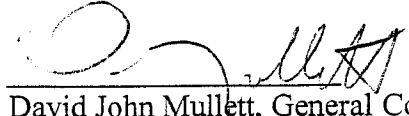
Dated this 25th day of January, 2008.

Vermont Public Power Supply Authority

By: 
David John Mullett, General Counsel
P.O. Box 298
5195 Waterbury-Stowe Road
Waterbury Ctr., VT 05677-0298
802-244-7678, ext. 227

Dated this 25th day of January, 2008.

Vermont Public Power Supply Authority

By: 
David John Mullett, General Counsel
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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

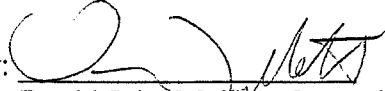
Vermont Public Power Supply Authority (“VPPSA”) has moved to intervene in this matter pursuant to Board Rule 2.209. Under Rule 2.209, intervention as a matter of right must be granted “when the applicant demonstrates a substantial interest which may be adversely affected by the outcome of the proceeding, where the proceeding affords the exclusive means by which the applicant can protect that interest and where the applicant’s interest is not adequately represented by existing parties.” Rule 2.209(A). Permissive intervention may also be granted in the discretion of the Board, which is required to consider whether the applicant’s interest is adequately protected by other parties, whether there are alternative means to protect that interest, and whether intervention will unduly delay the proceeding or cause prejudice to the parties or the public.

VPPSA respectfully submits that its interests in this matter meet the tests for either intervention as of right or permissive intervention. As noted in the motion, VPPSA provides numerous services to the fourteen geographically dispersed municipal electric systems who comprise its membership, including but not limited to power supply and resource planning services. The project that is the subject of this docket is a project of significant size and scope, and the outcome of this proceeding has prospective impacts on VPPSA member systems from both economic and reliability perspectives. No other party can fully protect the interests of VPPSA and its member systems in this matter, as the economic and reliability impacts of its outcome may vary from utility to utility. No prejudice or delay will be caused to any other party, as this motion is filed well before the intervention deadline. Moreover, VPPSA intends to limit its participation only to those issues having prospective impact on its interests or the interests of its members.

For these reasons, VPPSA respectfully requests that its motion be granted.

Dated this 25th day of January, 2008.

Vermont Public Power Supply Authority

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