

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NRG POWER MARKETING, LLC)	
)	
Petitioner,)	
)	No. 16-1027
v.)	
)	
FEDERAL ENERGY REGULATORY)	
COMMISSION,)	
)	
Respondent.)	
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**MOTION FOR LEAVE TO INTERVENE
OF THE ORGANIZATION OF MISO STATES**

Pursuant to Rule 15(d) of the Federal Rules of Appellate Procedure (“FRAP”) and Rule 15(b) of the rules of this Court, the Organization of MISO States, Inc. (“OMS”) hereby moves to intervene in this matter in support of Respondent, the Federal Energy Regulatory Commission (“FERC”).

In accordance with Circuit Rule 26.1, the OMS is a member-based 501(c)(4) non-profit, self-governing organization of representatives from each entity with regulatory jurisdiction over entities participating in the Midcontinent Independent System Operator, Inc. (“MISO”). No members or other entities have an ownership interest in the OMS. The purpose of the OMS is to coordinate regulatory oversight among its member regulators and make recommendations to MISO, the MISO Board of Directors, the FERC, courts and other relevant government entities as appropriate.

Petitioner NRG Power Marketing LLC seeks review of the following orders of the Federal Energy Regulatory Commission:

Midwest Independent Transmission System Operator, Inc., Order on Resource Adequacy Proposal, Docket No. ER11-4081-000, 139 FERC ¶ 61,199 (June 11, 2012); and

Midwest Independent Transmission System Operator, Inc., Order on Rehearing, Docket No. ER11-4081-001, 153 FERC ¶ 61,229 (November 20, 2015).

The OMS was a party to the case below at the FERC. Further, as an organization comprised of members tasked with representing the public interest in their respective jurisdictional areas, the OMS has an interest in the outcome of this case.

WHEREFORE, the OMS respectfully requests leave to intervene in this matter.

Respectfully,



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Proof of Service

I certify that all parties to this proceeding were served with this Motion for Leave to Intervene on February 18, 2016 in accordance with Circuit Rule 25(f).

Tanya Paslawski