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May 2, 2007

VIA ELECTRONIC FILING

The Honorable Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Comments of ISO New England Inc.;
Docket No. IC07-582-000; FERC-582

Dear Secretary Bose:

Attached for electronic filing in the above-referenced docket are the Comments of ISO New England Inc.

If there are any questions concerning this filing, please call me at (202) 661-2212.

Respectfully submitted,

/s/ Daniel R. Simon

Daniel R. Simon
Counsel for
ISO New England Inc.

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

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)	
Collection of Information via)	
FERC-582)	Docket No. IC07-582-000;
)	FERC-582
)	

**COMMENTS OF
ISO NEW ENGLAND INC.**

Pursuant to the Commission’s February 22, 2007 Notice in the above referenced docket, ISO New England Inc. (“ISO” or “ISO-NE”) hereby submits these Comments on the collection of information pursuant to FERC-582, “Electric Fees and Annual Charges.”

BACKGROUND

The ISO is the private, non-profit entity that serves as the regional transmission organization (“RTO”) for New England. The ISO operates the New England bulk power system and administers New England’s organized wholesale electricity market pursuant to the ISO Tariff and the Transmission Operating Agreement with the New England transmission owners. The ISO submits data annually on behalf of New England’s transmission owners in accordance with FERC-582, the Commission’s information collection requirement.

All correspondence and communications regarding these Comments should be addressed to the undersigned as follows:

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COMMENTS

The Commission has requested comments on, among other things, the accuracy of the Commission's assessment of the burden of the collection of information pursuant to FERC-582 and ways to minimize this burden. On the latter topic, the Commission specifically invites comment on the use of automated or other technological collection techniques. ISO-NE offers its comments on these subjects.

I. Assessment of the Burden

As stated above, ISO-NE compiles the required information on behalf of New England's transmission owners. This enables the Commission to process one bill for the New England Control Area's share of the Commission's annual charges, as opposed to twenty-one.

The Commission estimates the average burden of response as four hours. ISO-NE believes that this is an accurate assessment for each of New England's transmission owners, but does not capture the time spent by ISO-NE in collecting, compiling and filing the data with the Commission. ISO-NE estimates its time spent on these tasks as twenty to twenty-five hours on an annual basis.

Additionally, ISO-NE estimates that another ten hours per year are spent processing the Commission's bill, communicating the same to the transmission owners, collecting the relevant funds from the transmission owners and remitting them to the Commission.

II. Minimizing the Burden

ISO-NE does not believe that this process is unduly burdensome or difficult, or is in need of a technological solution. The only process improvement ISO-NE believes is warranted is an extension of the annual reporting date from April 30 to the end or even the middle of May. The rationale for an extension is that the FERC Form 1 is also due in April, and much of the information required by FERC-582 is gleaned from Form 1. An extension would provide ISO-NE (and other entities aggregating data) with sufficient time to collect and compile the required information from transmission owners.

Respectfully submitted,

/s/ Maria A. Gulluni
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Date: May 2, 2007

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