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April 25, 2008

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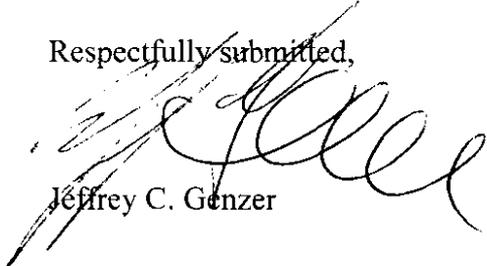
Honorable Jaclyn A. Brillling  
Secretary  
Public Service Commission  
3 Empire State Plaza  
Albany, New York 12223-1350

Re: CASE 07-M-0906 – Joint Petition of Iberdrola, S.A., Energy East Corporation, RGS Energy Group, Inc., Green Acquisition Capital, Inc., New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation for Approval of the Acquisition of Energy East Corporation by Iberdrola, S.A.

Dear Secretary Brillling:

Enclosed for filing are an original and five copies of the Post-Hearing Reply Brief of the New York Association of Public Power and the New York State Rural Electric Cooperative Association in the above-captioned case. Copies have been served on the presiding Administrative Law Judge and on all active parties listed on the active service list.

Respectfully submitted,

  
Jeffrey C. Genzer

cc: Administrative Law Judge Epstein  
All Active Parties

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

CASE 07-M-0906 - Joint Petition of Iberdrola, S.A., Energy East Corporation, RGS Energy Group, Inc., Green Acquisition Capital, Inc., New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation for Approval of the Acquisition of Energy East Corporation by Iberdrola, S.A.

**POST-HEARING REPLY BRIEF  
OF  
THE NEW YORK ASSOCIATION OF PUBLIC POWER  
AND  
THE NEW YORK STATE RURAL ELECTRIC COOPERATIVE ASSOCIATION**

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Dated: Washington, D.C.  
April 25, 2008

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

CASE 07-M-0906 - Joint Petition of Iberdrola, S.A., Energy East Corporation, RGS Energy Group, Inc., Green Acquisition Capital, Inc., New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation for Approval of the Acquisition of Energy East Corporation by Iberdrola, S.A.

POST-HEARING REPLY BRIEF OF THE NEW YORK ASSOCIATION OF PUBLIC  
POWER AND THE NEW YORK STATE RURAL ELECTRIC COOPERATIVE  
ASSOCIATION

ARGUMENT

No parties in their initial briefs in this case objected to the commitments made by the Joint Petitioners to the members of the New York Association of Public Power (NYAPP) and the New York State Rural Electric Cooperative Association (NYSRECA). These commitments were presented in the Partial Acceptance Document (Tr. 577-588 and Exhibit 50 (JPP-9)). Strategic Power Management, LLC did specifically express support for the procedures in the Partial Acceptance Document aimed at resolving issues raised by NYAPP and NYSRECA.

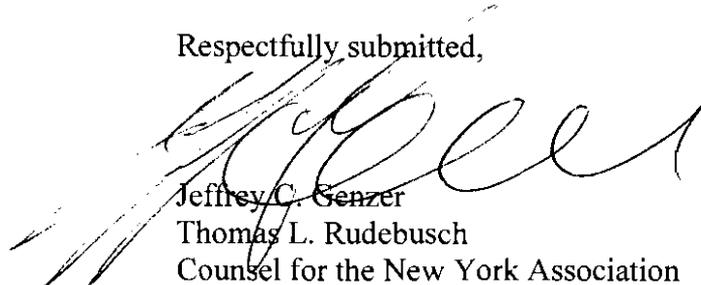
The commitments made by the Joint Petitioners are exceedingly important to the impacted members of NYAPP and NYSRECA, specifically, Delaware County Electric Cooperative, Oneida Madison Electric Cooperative, Otsego Electric Cooperative, Steuben Rural Electric Cooperative and the Village of Sherburne. These commitments, when implemented, will improve system reliability, improve communications, improve service quality, etc. From the perspective of NYAPP and NYSRECA, these system impacts should be significant and provide an important rationale for approval of the

transaction. If this merger does not close, NYAPP and NYSRECA may be forced to take other, more expensive, actions to enforce the commitments made in the Partial Acceptance Document.

CONCLUSION

NYAPP and NYSRECA do not oppose the merger application, with the specific condition that the Partial Acceptance Document is implemented in a timely manner, consistent with its terms. Additionally, with these commitments made by the Joint Petitioners, NYAPP and NYSRECA would support approval of the merger application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Genzer', is written over the typed name and title.

Jeffrey C. Genzer  
Thomas L. Rudebusch  
Counsel for the New York Association  
of Public Power and the New York State  
Rural Electric Cooperative Association

Dated: Washington, D.C.  
April 25, 2008