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August 7, 2007

BY HAND DELIVERY

Mr. James E. Dyer
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

**Re: NRC License Nos. DPR-3, SFGL-13, DPR-36, SFGL-14, DPR-61, and
SFGL-16: Proposed Acquisition of Energy East Corporation By
IBERDROLA, S.A.**

Dear Mr. Dyer:

On June 25, 2007, IBERDROLA, S.A. ("IBERDROLA"), a corporation organized under the laws of the Kingdom of Spain, entered into an Agreement and Plan of Merger for the acquisition of Energy East Corporation ("Energy East"), a utility holding company headquartered in New Gloucester, Maine (the "Proposed Transaction"). The Proposed Transaction will be effectuated by way of a merger of a wholly-owned subsidiary of IBERDROLA with and into Energy East, with Energy East being the surviving corporation. As a result, upon closing of the Proposed Transaction, Energy East will become a wholly-owned subsidiary of IBERDROLA. Neither IBERDROLA or its subsidiaries, nor Energy East or its subsidiaries, own or control a Nuclear Regulatory Commission ("NRC" or "Commission") license. Central Maine Power Company ("Central Maine"), an indirect, wholly-owned subsidiary of Energy East, holds minority, non-controlling interests in three companies that own nuclear power facilities holding NRC licenses, each of which has been permanently shut down and has either completed decommissioning or is expected to be completed with decommissioning before the Proposed Transaction is consummated. The three companies are: Maine Yankee Atomic Power Company ("MYAPC"), Yankee Atomic Electric Company ("YAEC"), and Connecticut Yankee Atomic Power Company ("CYAPC") (collectively, MYAPC, YAEC and CYAPC are referred to as the "Yankee Companies"). There will be no

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change in the name or identity of any licensee nor any need for an amendment to any license or accompanying documents as a result of the Proposed Transaction. The purpose of this letter is to seek the NRC's concurrence that the Proposed Transaction does not require the NRC's consent or approval. The Proposed Transaction is expected to close during the first half of 2008.

I. DESCRIPTION OF PARTIES

A. IBERDROLA

IBERDROLA is a global utility and one of the largest energy companies in the world with a market capitalization of approximately \$70 billion. IBERDROLA provides services to approximately 22 million electric points of supply and more than 2 million gas points of supply in Europe and the Americas, including 10 million points of supply in Spain, 7.7 million in Brazil, 3.4 million in the United Kingdom, and approximately 1 million in Guatemala and Bolivia. IBERDROLA's principal place of business is Calle Cardenal Gardoqui, 8, 48008 Bilbao, Spain.

IBERDROLA has over 100 years of experience as an electric utility, including extensive experience as a provider of electric transmission and distribution services, and is a recognized leader in the energy industry.¹ IBERDROLA, through its subsidiaries, owns a diversified portfolio of approximately 40,000 MW of electric generation worldwide, comprised primarily of low emission assets (hydro, nuclear² and gas combined-cycle). In addition, IBERDROLA is the largest producer of wind energy in the world with over 6,800 MW of wind capacity, and has over 40,000 MW of new renewable resources in the pipeline, including over 20,000 MW in the United States. IBERDROLA is also engaged in the natural gas business in Europe and the Americas, as a gas supplier and developer of gas infrastructure. A listing of IBERDROLA's Board of Directors is set forth in the Attachment to this letter.

¹ IBERDROLA was recognized for its leadership and achievement in 2006 when it was named the Energy Company of the Year by Platts Global Energy Awards. IBERDROLA has also been named a leader in the Worldwide Utilities Category of the Dow Jones Sustainability Index, identified as one of the 50 best companies in climate strategy and listed as one of the Global 100 Most Sustainable Corporations in the World. IBERDROLA's Chairman and CEO, Ignacio Sanchez Galán, was named CEO of the Year by Platts Global and has been recognized as best executive among European utilities for five consecutive years. IBERDROLA's CFO, Jose Sainz Armada, repeatedly has been named one of Europe's Best CFOs, and IBERDROLA's Ignacio Cuenca has been recognized as Best Investor Relations Professional by Institutional Investor Research Group.

² IBERDROLA owns 43% of the installed nuclear capacity in Spain (3,344 MWe). Spain's nuclear portfolio is composed of eight operating reactors, totaling 7,728 MWe, seven of which have Westinghouse or General Electric U.S. technology. IBERDROLA operates directly the Cofrentes Nuclear Power Plant (1,100 MWe), which is wholly-owned by IBERDROLA and started commercial operation in 1985, and indirectly through joint ventures operates the other seven operating reactors in Spain. Spain's nuclear power plants have a record of close to an 85% lifetime capacity factor, and participate in the Institute of Nuclear Power Operations and World Association of Nuclear Operators.

B. ENERGY EAST

Energy East is a public utility holding company organized under the laws of the State of New York. Energy East's headquarters are located at 52 Farm View Drive, New Gloucester, Maine and 89 East Avenue, Rochester, New York. Energy East is an energy services and delivery company with operations in Connecticut, New York, Massachusetts, Maine, and New Hampshire, serving approximately 1.8 million electric customers and 900,000 natural gas customers. Energy East's principal business subsidiaries are engaged in regulated natural gas transportation, storage and distribution operations in Connecticut, upstate New York, Maine, Massachusetts, and New Hampshire, and in regulated electricity transmission, distribution and generation operations in upstate New York and Maine. Energy East is the ultimate parent of Central Maine.

1. Central Maine

Central Maine, a public utility organized under the laws of the state of Maine, is a direct, wholly-owned subsidiary of CMP Group, Inc., which, in turn, is a direct, wholly-owned subsidiary of Energy East. Central Maine is primarily engaged in transmitting and distributing electricity generated by others to retail customers in Maine.

Central Maine serves approximately 596,000 residential, commercial, industrial, and wholesale customers in the southern, western and central regions of the state of Maine. Central Maine's retail and distribution services are regulated by the Maine Public Utilities Commission ("Maine PUC") and its wholesale and transmission services are regulated by the Federal Energy Regulatory Commission ("FERC"). By virtue of the Proposed Transaction, Central Maine would become an indirect, wholly-owned subsidiary of IBERDROLA. Central Maine would maintain its status as a U.S. entity, domiciled in the United States and subject to all applicable laws of the United States.

1.01 Yankee Facilities and Central Maine's Interests

Central Maine holds minority, non-controlling interests in three companies that own facilities with NRC licenses. Each of the nuclear power plants is shut down and has either completed decommissioning or is expected to be completed with decommissioning later this year. Central Maine's holdings are: (1) a 38 percent interest in MYAPC, which in turn owned the Maine Yankee Nuclear power station ("Maine Yankee"), located just south of Wiscasset, Maine; (2) a 9.5 percent interest in YAEC, which in turn owned the Yankee Rowe nuclear power station ("Yankee Rowe"), located in Rowe, Massachusetts; and (3) a 6 percent interest in CYAPC, which in turn owned the Connecticut Yankee nuclear power station ("Connecticut Yankee") at Haddam's Neck, Connecticut. Other New England utility companies own the remaining interests in each of MYAPC,³ YAEC⁴ and CYAPC.⁵

³ The shareholders in MYAPC and their respective shareholder interests are: Bangor Hydro-Electric Company - 7%; NSTAR Electric Company (successor in interest to Cambridge Electric Light Company) - 4%; Central Maine - 38%; Central Vermont Public Service Corporation - 2%; Maine Public

Each of the Yankee Companies is governed by a Board of Directors. Each shareholder of the Yankee Companies owning up to a 15% interest is entitled to appoint one member of the Board of Directors, and shareholders owning a 15% or more interest are entitled to appoint up to three members of the Board of Directors. For each of the Yankee Companies, Board members are collectively entitled to cast votes proportionate to the shareholders' respective percentage ownership interests. Additionally, under the Yankee Companies' bylaws, shareholder action is authorized by majority vote. There are no agreements or other arrangements with its co-owners or any other third party, written or oral, express or implied, tacit or otherwise, whereby Central Maine is provided with direct or indirect voting authority or control in excess of its percentage ownership interest in the respective Yankee Companies.

The shareholders of the Yankee Companies are each obligated to pay the Yankee Companies' operating expenses in proportion to their ownership interest in the respective Yankee Companies in accordance with rate schedules on file with the FERC. Current operating expenses include decommissioning costs, spent fuel costs, and Independent Spent Fuel Storage Installation ("ISFSI") costs. Central Maine collects its payments for these expenses from its customers pursuant to stranded cost rates approved by the Maine PUC.

1.01(a) Maine Yankee

MYAPC is the sole licensee with respect to the Maine Yankee nuclear facilities. MYAPC holds a Part 50 facility operating license, denominated License No. DPR-36, and a Part 72 general ISFSI license, License No. SFGL-14. The Maine Yankee nuclear power plant was an approximately 920 MW pressurized water reactor ("PWR") that began commercial operation in 1972 and was permanently shut-down in August 1997 when it was determined that it was no longer economically viable to operate. MYAPC's License Termination Plan was approved on

Service Company - 5%; New England Power Company - 24%; and Northeast Utilities Service Company (successor in interest to Connecticut Light & Power Company, Public Service Company of New Hampshire, and Western Massachusetts Electric Company) - 20%.

⁴ The shareholders in YAEC and their respective shareholder interests are: Central Maine - 9.5%; Central Vermont Public Service Corporation - 3.5%; New England Power Company - 34.5%; Northeast Utilities Service Company (successor in interest to Connecticut Light & Power Company, Public Service Company of New Hampshire, and Western Massachusetts Electric Company) - 38.5%; and NSTAR Electric Company (successor in interest to Boston Edison Company, Cambridge Electric Light Company, and Commonwealth Electric Company) - 14%.

⁵ The shareholders in CYAPC and their respective shareholder interests are: Central Vermont Public Service Corporation - 2%; Central Maine - 6%; New England Power Company - 19.5%; Northeast Utilities Service Company (successor in interest to Connecticut Light & Power Company, Public Service Company of New Hampshire, and Western Massachusetts Electric Company) - 49%; NSTAR Electric Company (successor in interest to Boston Edison Company and Commonwealth Electric Company) - 14.0%; and The United Illuminating Company - 9.5%.

September 30, 2005.⁶ In October 2005, Maine Yankee was notified by the NRC that its former plant site had been successfully decommissioned in accordance with NRC procedures. The NRC amended MYAPC's Part 50 license, reducing the land under the license from approximately 179 acres to an approximate 12-acre site including the ISFSI, where Maine Yankee's 64 spent fuel and Greater Than Class C ("GTCC") waste canisters are kept.⁷ The waste canisters use the NAC-UMS technology developed and marketed by NAC International, a passively cooled, low maintenance system.

1.01(b) Yankee Rowe

YAEC is the sole licensee with respect to the Yankee Rowe nuclear facilities. YAEC holds a Part 50 facility operating license, denominated License No. DPR-3, and a Part 72 general ISFSI license, License No. SFGL-13. Yankee Rowe nuclear power plant was an approximately 167 MW PWR that began commercial operation in July, 1961 and was permanently shut down on February 26, 1992. YAEC's License Termination Plan was approved by the NRC on July 28, 2005.⁸ Physical decommissioning of the Yankee Rowe plant was completed in 2006. Later this year, YAEC expects to obtain NRC approval of its decommissioning and to amend its Part 50 license, reducing the land under the license from 2200 acres to the approximate 5-acre ISFSI site where Yankee Rowe's 16 spent fuel and GTCC waste canisters are kept. The Yankee Rowe ISFSI waste canisters use the NAC-MPC technology developed and marketed by NAC International for storage and transport of nuclear fuel from older commercial reactors. Like the NAC-UMS technology, NAC-MPC dry casks are passively cooled and have low maintenance costs.

1.01(c) Connecticut Yankee

CYAPC is the sole licensee with respect to the Connecticut Yankee nuclear facilities. CYAPC holds a Part 50 facility operating license, denominated License No. DPR-61, and a Part 72 general ISFSI license, License No. SFGL-16. The Connecticut Yankee nuclear power plant was an approximately 600 MW PWR that began commercial operation in 1968. In 1996, the CYAPC Board of Directors voted to permanently close and decommission the power plant. CYAPC's License Termination Plan was approved by the Commission on October 15, 2003.⁹ Decommissioning is expected to be completed in 2007. Later this year, CYAPC expects to obtain NRC final approval of its decommissioning and to amend its Part 50 license, reducing the land under the license from approximately 500-acres to the approximate 5-acre ISFSI where Connecticut Yankee's 43 spent fuel and GTCC waste canisters are kept. As with Yankee Rowe, Connecticut Yankee's waste canisters are the NAC-MPC type.

⁶ See *Maine Yankee Atomic Power Co.*, "Amendment To Facility Operating License," Docket No. 50-309 (Sept. 30, 2005) (approving License Amendment No. 172 to License No. DPR-36).

⁷ *Maine Yankee Atomic Power Co.*, 70 Fed. Reg. 58758 (Oct. 7, 2005).

⁸ See *Yankee Atomic Electric Co.*, "Amendment To Possession Only License," Docket No. 50-29 (July 28, 2005) (approving License Amendment No. 158 to License No. DPR-3).

⁹ *Connecticut Yankee Atomic Power Co.*, 58 NRC 262 (Oct. 15, 2003).

II. THE TRANSACTION COMPLIES WITH THE ATOMIC ENERGY ACT

A. THE PROPOSED TRANSACTION DOES NOT REQUIRE NRC CONSENT OR APPROVAL FOR THE TRANSFER OF OWNERSHIP OR CONTROL OF AN NRC LICENSE

Under Section 184 of the Atomic Energy Act (“AEA”),¹⁰ an NRC license may not be “transferred, assigned or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person” without the Commission’s consent. The Proposed Transaction does not involve any transfer of an NRC license under Section 184 of the AEA.

There is no direct transfer of ownership of an NRC license given that neither IBERDROLA or its subsidiaries, nor Energy East or its subsidiaries, hold an NRC license. Although Central Maine holds a minority ownership interest in the Yankee Companies, the NRC’s consent is needed only for transfers of NRC licenses, not for transfers of minority ownership interests in NRC licensees.¹¹ Therefore, the Proposed Transaction does not entail any direct transfer of any NRC licenses for the Yankee Atomic, Maine Yankee, or Connecticut Yankee facilities that would require NRC consent.

The Proposed Transaction also does not involve any transfer of control over the licenses held for the Maine Yankee, Yankee Atomic, or Connecticut Yankee facilities. As discussed above, Central Maine holds minority ownership interests in the Yankee Companies, with voting rights proportionate to its ownership interests, and does not otherwise directly or indirectly control the Yankee Companies. When Energy East acquired Central Maine, an application was filed on October 6, 1999, for a license transfer due to Central Maine’s previous ownership interest in the Millstone Nuclear Power Station, Unit 3,¹² but an application for NRC approval was not filed seeking authorization for any license transfer concerning Central Maine’s ownership interests in the Yankee Companies.¹³ The Safety Evaluation prepared by the Office of Nuclear Reactor Regulation for Millstone discussed the fact that no application for NRC approval was filed or needed for Maine Yankee, Connecticut Yankee or Yankee Rowe, explaining as follows:

¹⁰ 42 U.S.C.A. § 2234 (2007).

¹¹ See n. 14, *infra*.

¹² Central Maine’s interest in Millstone Nuclear Power Station, Unit 3 was sold to Dominion Resources Inc. in March 2001, and Central Maine no longer holds any ownership interest in this facility.

¹³ At that time, Central Maine also held a 4 percent ownership interest in Vermont Yankee Nuclear Power Corporation, but since that time the Vermont Yankee plant was sold to a subsidiary of Entergy Corporation, Entergy Nuclear Vermont Yankee, LLC, and Central Maine no longer holds any ownership interest in the plant.

Central Maine is not a licensee of any of the four nuclear facilities owned by the Yankee Companies and is a minority owner of each of these companies, so it does not directly control the plants or their license activities. No direct or indirect transfer of a license is involved for Central Maine with respect to any of these four nuclear facilities as a result of the merger, and, therefore, no NRC approval is required with regard to their licenses.¹⁴

The conclusion reached in the Safety Evaluation still holds, as there has been no subsequent change in circumstances with respect to Central Maine's ownership or control of the licensees for the Maine Yankee, Yankee Rowe, or Connecticut Yankee facilities. Therefore, there is no direct license transfer or indirect transfer of control over a license that requires NRC consent or approval as a result of the Proposed Transaction.

B. THE PROPOSED TRANSACTION DOES NOT RAISE ANY CONCERNS WITH FOREIGN OWNERSHIP, CONTROL OR DOMINATION OF AN NRC LICENSEE

Section 103(d) of the AEA¹⁵ prohibits the Commission from issuing a license for a nuclear power plant to an "alien or any corporation or other entity if the Commission knows or has reason to believe it is owned, controlled, or dominated by an alien, a foreign corporation, or a foreign government." Section 103(d) further provides that "no license may be issued to any person within the United States if, in the opinion of the Commission, the issuance of a license to such person would be inimical to the common defense and security or to the health and safety of the public." The Proposed Transaction does not trigger any concerns with the restrictions governing foreign ownership set forth in Section 103(d).

The Proposed Transaction satisfies the plain meaning of Section 103(d), as neither IBERDROLA or its subsidiaries, nor Energy East or its subsidiaries, hold an NRC license. Therefore, no entity involved in the Proposed Transaction holds an NRC license. The Yankee Companies will continue to be the licensees regulated by the Commission. Thus, as a matter of law, the licenses would be held by a U.S. company, consistent with Section 103(d).

¹⁴ "Safety Evaluation By The Office of Nuclear Reactor Regulation, Proposed Merger of CMP Group, Inc. and Energy East Corporation (Millstone Nuclear Power Station, Unit 3)," at page 2, n. 1, Docket No. 50-424, issued February 4, 2000. The conclusion of the Office of Nuclear Reactor Regulation regarding the Energy East-CMP Group, Inc. transaction is consistent with an earlier conclusion reached regarding New England Power Company's ownership interest in the Yankee Companies. The Safety Evaluation prepared by the Office of Nuclear Reactor Regulation in The National Grid Group's acquisition of New England Electric System, including New England Power Company, found no direct or indirect transfer of a license with respect to New England Power Company's ownership in the Yankee Companies. "Safety Evaluation By The Office of Nuclear Reactor Regulation, Proposed Merger of New England Electric System and The National Grid Group (Seabrook Station, Unit 1)," at page 3, n. 1, Docket No. 50-443, issued December 10, 1999.

¹⁵ 42 U.S.C.A. § 2133.d (2007).

In addition, none of the Yankee Companies will be subject to foreign control or domination after consummation of the Proposed Transaction. As discussed above, Central Maine holds minority, non-controlling interests in the licensees, and nothing will change with respect to its ownership interests or lack of control of the Yankee Companies as a result of the Proposed Transaction. As quoted above, the NRC staff concluded in the Safety Evaluation in connection with Energy East's acquisition of Central Maine that Central Maine "is a minority owner of each of these companies, so it does not directly control the plants or their license activities." Central Maine's ownership interest in the Yankee Companies has not changed since Energy East's acquisition of Central Maine.

Moreover, the Proposed Transaction would not involve any change in circumstances with respect to the Yankee Companies that would be inimical to the common defense and security or to the health and safety of the public. The Maine Yankee, Yankee Rowe and Connecticut Yankee nuclear power facilities have been permanently shut down, fully dismantled, and decommissioning has been completed, or is expected to be completed before the Proposed Transaction is consummated, at each of the facilities. The only nuclear facilities that remain at the sites are ISFSIs, all of which use proven and licensed dry cask, passively cooled technology and are sited at above ground storage areas. As a result, there are no facilities at the sites that involve sensitive technology or interests inimical to the common defense and security or to the health and safety of the United States.

As reflected in the Attachment to this letter, the Yankee Companies share a common officer who is responsible for facility safety and security. This officer is the Chief Nuclear Officer ("CNO") at MYAPC and also serves as the President and Chief Executive Officer of CYAPC and YAEC, and reports to their Boards of Directors. The CNO of MYAPC reports to the President of MYAPC. Each of the Yankee Companies also has an ISFSI Manager, who is responsible for day-to-day ISFSI operations and management, and who reports to its company President. Central Maine has no role in reviewing or approving the safety and security plans of the Yankee Companies.

Finally, IBERDROLA's home country is one of the strongest allies of the United States, and IBERDROLA's safety record with its own nuclear reactors is unblemished. Spain is a country with which the United States has a long and positive relationship, and it is a member of the European Union, the North Atlantic Treaty Organization, and the European Atomic Energy Community, and is a party to the Treaty on the Non-Proliferation of Nuclear Weapons. Moreover, Spain's nuclear regulatory body, Consejo de Seguridad Nuclear, has maintained close relations with the NRC since the inception of nuclear energy in Spain in the 1970s. In sum, IBERDROLA's indirect ownership of Central Maine, which lacks control of the Yankee Companies, does not raise any concerns with foreign ownership.

III. CONCLUSION

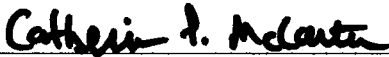
It is our view that the Proposed Transaction does not involve a transfer of ownership or control of an NRC license and does not raise any concerns with the NRC's foreign

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ownership restrictions, and therefore, there is no need for NRC consent or approval for the Proposed Transaction. There would be no change in the licensee of any nuclear facilities, and Central Maine has minority, non-controlling ownership interests in the licensees.

On the basis of the foregoing discussion, we respectfully request a letter from the NRC staff that there is no need to obtain NRC consent or approval for the Proposed Transaction. Should you have any questions please do not hesitate to contact the undersigned.

Respectfully submitted,


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Office of Nuclear Reactor Regulation

Steven R. Hom
Senior Financial Policy Advisor
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Attachment

Maine Yankee Atomic Power Company

Officers	
Gerald C. Poulin	Chairman of the Board of Directors and President
Wayne A. Norton	Chief Nuclear Officer
James M. Connell	Vice President and ISFSI Manager
William M. Finn	Secretary
Directors	Shareholder Represented
Michael F. Ahern	Northeast Utilities Service Company
Brent M. Boyles	Maine Public Service Company
Sara J. Burns	Central Maine Power Company
James L. Connors, Q.C.	Bangor Hydro-Electric Company
Frederic E. Greenman	New England Power Company
Michael J. Hager	New England Power Company
William S. Hass	New England Power Company
Bruce D. Kenyon	Northeast Utilities Service Company
R. Scott Mahoney	Central Maine Power Company
Robert H. Martin	NSTAR Electric Company
Stephen W. Page	Central Vermont Public Service Corporation
Gerald C. Poulin	Central Maine Power Company

Yankee Atomic Electric Company

Officers	
Bruce D. Kenyon	Chairman
Wayne A. Norton	President & Chief Executive Officer
Carla M. Pizzella	Treasurer and Assistant Clerk
Merrill J. Atkins	Clerk and Assistant General Counsel
Directors	Shareholder Represented
Michael F. Ahern	Northeast Utilities Service Company
Frederic E. Greenman	New England Power Company
Michael J. Hager	New England Power Company
William S. Hass	New England Power Company
Bruce D. Kenyon	Northeast Utilities Service Company
Robert H. Martin	NSTAR Electric Company
Stephen W. Page	Central Vermont Public Service Company

Gerald C. Poulin	Central Maine Power Company
Neven Rabadjija	NSTAR Electric Company
Randy Shoop	Northeast Utilities Service Company

Connecticut Yankee Atomic Power Company

Officers	
Bruce D. Kenyon	Chairman
Wayne A. Norton	President & Chief Executive Officer
Carla M. Pizzella	Treasurer and Assistant Clerk
Merrill J. Atkins	Clerk and Assistant General Counsel
Directors	Shareholder Represented
James F. Crowe	The United Illuminating Company
Frederic E. Greenman	New England Power Company
Michael J. Hager	New England Power Company
William S. Hass	New England Power Company
Bruce D. Kenyon	Northeast Utilities Service Company
Duncan MacKay	Northeast Utilities Service Company
Robert H. Martin	NSTAR Electric Company
Raymond Necci	Northeast Utilities Service Company
Stephen W. Page	Central Vermont Public Service Company
Gerald C. Poulin	Central Maine Power Company
Neven Rabadjija	NSTAR Electric Company
Randy Shoop	Northeast Utilities Service Company

Central Maine Power Company

Directors	
Sara J. Burns	Central Maine Power Company
Wesley von Schack	Energy East Corporation
Robert E. Rude	Energy East Corporation
F. Michael McClain	Energy East Corporation

CMP Group, Inc.

Directors	
F. Michael McClain	Energy East Corporation
Robert E. Rude	Energy East Corporation
Wesley von Schack	Energy East Corporation

Energy East Corporation

Directors
Mr. James H. Brandi
Mr. John T. Cardis
Mr. Thomas B. Hogan, Jr.
Ms. G. Jean Howard
Mr. David M. Jagger
Mr. Seth A. Kaplan
Mr. Ben E. Lynch
Mr. Peter J. Moynihan
Ms. Patricia M. Nazemetz
Mr. Walter G. Rich
Wesley W. von Schack

IBERDROLA, S.A.

Directors
José Ignacio Sánchez Galán
Juan Luis Arregui Ciársolo
Víctor de Urrutia Vallejo
José Orbegoza Arroyo
Lucas M. de Oriol López-Montenegro
Ricardo Álvarez Isasi
José Ignacio Berroeta Echevarría
Julio de Miguel Aynat
Sebastián Battaner Arias
Xabier de Irala Estévez
Iñigo Víctor de Oriol Ibarra
Inés Macho-Stadler
Braulio Medel Cámara
Nicolás Osuna García
José Luis Olivas