

STATE OF FLORIDA

COMMISSIONERS:
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MICHAEL A. PALECKI
RUDOLPH "RUDY" BRADLEY



DIVISION OF EXTERNAL AFFAIRS
CHARLES H. HILL
DIRECTOR
(850) 413-6800

Public Service Commission

June 14, 2002

VIA ELECTRONIC FILING

The Honorable Magalie R. Salas
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Docket No. RM02-1-000, Standardizing Generator Interconnection Agreements and Procedures Notice of Proposed Rulemaking

Dear Ms. Salas:

Forwarded herewith are comments of the Florida Public Service Commission on proposed rules in the above-captioned proceeding regarding Standardizing Generator Interconnection Agreements and Procedures.

Should you have questions, you may contact Melinda Butler, the primary staff person on this matter, at (850) 413-6875.

Sincerely,

/ s /

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

CBM:tf

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

Docket No. RM02-1-000

Standardizing Generator Interconnection Agreements and Procedures
Notice of Proposed Rulemaking

COMMENTS OF THE FLORIDA PUBLIC SERVICE COMMISSION

The Florida Public Service Commission (FPSC) supports the FERC in its efforts to standardize generator interconnection and commends the FERC on its significant progress toward that end which is reflected in the Notice of Proposed Rulemaking (NOPR), Standardization of Generator Interconnection Agreements and Procedures.¹ The FPSC welcomes this opportunity to provide input on standardizing generator interconnection. However, on a broader level, the FPSC continues to support the development of a mechanism that would expand the opportunities for the FPSC to serve in a consultative and advisory capacity to the FERC on all issues related to bundled electric service, approval of generation interconnection agreements, and other matters affecting Florida retail consumers.

In regard to the proposed Interconnection Agreement, the FPSC offers recommendations to accommodate regional differences, among other things. The FPSC recommends that the FERC modify the Interconnection Agreement (IA) as set forth in Attachment A.

The FPSC is recommending that the FERC acknowledge and memorialize states as regulatory partners in the following areas:

- (1) reliability;
- (2) network upgrade cost allocation; and
- (3) indemnification for taxes imposed on Transmission Providers.

¹The FPSC notes that we have a pending docket on the GridFlorida RTO, which may have overlapping issues. The State docket is paramount to the State Commission. These comments must necessarily be preliminary in nature.

The FPSC is also recommending that any unrefunded amounts paid by Generators for network upgrades be retained by a Transmission Provider after ten years from the date the network upgrades are placed in service.

Finally, the FPSC is recommending a period for NOPR reply comments to allow for a more thorough analysis of the queuing issue and the issues surrounding Network Resource Interconnection Service before final adoption of the rule.

Regulatory Partnership

Although the IA and the Interconnection Procedures (IP) do not explicitly accommodate regional differences, the FERC gives recognition to the legitimacy of such differences. On page 16 of the NOPR, FERC states that,

While the Transmission Providers, state regulators and others may have raised legitimate concerns regarding regional differences, they have not specifically identified the modifications that need to be made to the IA and IP to accommodate these differences. In some instances, parties have raised concerns that are outside the standard terms and conditions of the NOPR IA and IP. The Commission proposes to adopt the approach used in Order No. 888: however, if commenters identify legitimate concerns about a need for regional variations in specific provisions in the NOPR IA and IP, the Commission will consider revisions to these provisions that would permit regional variations as appropriate.

Reliability

As we have pointed out in our comments of January 8, 2001, states have engaged in various approaches to maintaining reliability in response to state-specific circumstances. For instance, in Peninsular Florida the utilities have developed a sophisticated system that is responsive to being vulnerable to a separation of the transmission system from the rest of the interconnected grid. Within this system, generator tripping points are coordinated with a scheme of load under-frequency

relaying. Thus, reliability is enhanced by preventing premature tripping of generators which, in turn, could result in possible statewide blackouts.

Section 9.7.3 of the IA provides an example of how reliability would be enhanced in Florida if the FERC were to acknowledge and memorialize state commissions as regulatory partners. As the section currently reads, it does not adequately set forth the requirements that would perpetuate the sophisticated system that is already in place.

As set forth in Attachment A, the FPSC is recommending that, for states with statutory requirements to plan, develop and maintain a coordinated electric power grid, the parties to the IA be subject to any modifications to the IA which are ordered by the state commission concerning reliability. By acknowledging and memorializing state commissions as regulatory partners on matters concerning reliability, FERC can facilitate states' efforts to fulfill their statutory requirements to plan, develop, and maintain a coordinated electric power grid throughout their state.² FERC can also promote competition by fostering a well managed, well functioning and coordinated grid.

Network Upgrade Cost Allocation

Contained on page 3 of the NOPR are the issues that need to be resolved to properly implement an interconnection agreement. Included on the list are how to allocate costs and benefits and how to assign cost responsibility of system upgrades for interconnection. The FPSC believes that there can be some serious drawbacks to states with "bundled" retail service to socialize interconnection upgrade costs, as proposed.

²For instance, Florida has "grid bill authority" as set forth in Sections 366.04, 366.05, and 366.055, F.S.

Timeliness of FPSC Request. Through a series of cases dating back to Public Service Company of Colorado and through more recent cases involving Tampa Electric and Florida Power & Light, the FERC has developed its incipient policy with respect to who pays and what is allocated. Along the way FERC has eliminated nearly all aspects of the “but for” test and through these cases has socialized interconnection costs to all users of the transmission system. Even though the NOPR expresses that proper implementation includes making an overt decision as to how to allocate costs and benefits and how to assign cost responsibility, there is no direct attention paid to these issues.

The FPSC believes that this is the opportune time for the FERC to re-examine its current cost assignment procedures with respect to interconnection facilities upgrades. Historically, when a generator (an incumbent or an independent) interconnected to the transmission system, that generator, in most cases, would be serving load of the incumbent utility. This incumbent utility was generally a transmission provider or was serving load for transmission customers of that utility. Thus, there was an approximate nexus of those causing the interconnection upgrades and those receiving the benefits. The advent of multi-regional and multi-state RTOs is likely to significantly exacerbate the problems created by the current cost assignment model being used by the FERC.

The FPSC strongly urges that the FERC follow its own directive to consider how to allocate costs and benefits and how to assign cost responsibility in order to properly implement standardization of generator interconnection agreements and procedures. The FPSC is recommending offering an option to states with bundled retail service to allocate certain network interconnection upgrade costs. Due to the unique features of this proposal, the FPSC believes that Generators can continue to receive credits which can help encourage their market participation. At the same time, costs can be properly allocated in order to reap the benefits that emanate from properly tracking cost causality.

Drawbacks of Cost Socialization. As was stated in our comments of January 8, 2002, in the instant docket, the FPSC continues to be concerned that the socialization of interconnection upgrade costs, as proposed, may provide a perverse incentive to locate generating units in places where the overall costs for fuel delivery, transmission, and other associated power plant costs, are not minimized. If plants are not located in the most efficient manner, costs to retail customers will increase unnecessarily.

The FPSC is concerned with the equity impacts of the elimination of direct cost assignments for facilities. One instance where there is a potential equity impact is where retail electric service is bundled. Another instance, can be drawn directly from Article 4, Scope of Service of the Standard Generator and Operating Agreement, of the NOPR. This agreement defines two types of interconnection services - Energy Resources (ER) and Network Resources (NR). In this instance the equity impacts may have a large financial consequence.

The problem with equity impacts arises with the NR service level. Section 4.1.2.1 of the Interconnection Agreement reads,

The Transmission Provider must conduct the necessary studies and construct the Network Upgrades needed to integrate the Facility (1) in a manner comparable to that in which the Transmission Provider integrates its generating facilities to serve native load customers; or (2) in an ISO or RTO with market based congestion management in the same manner as all other Network Resources.³ [emphasis added]

This requirement under the NOPR appears to create an open checkbook allowing all generators to ask for the highest level of interconnection service knowing that these costs will be borne by all users of the system. Florida has a statutory requirement to add transmission lines that

³The FPSC recognizes a further confusing result of this section. While the Transmission Provider is required to construct to a Network Resource designation level, the NOPR states that this does not mean that the generator must be designated a network resource in the future. This requires a standard of service be constructed that in fact may never be requested.

meet a least-cost planning criteria. The FPSC is concerned that this proposal would violate such practices.

It is possible that these costs will be significant. Section 4.1.2.1, as written, could potentially require the Transmission Provider to construct extensive transmission backbone facilities that would permit the generator to be designated a Network Resource. In essence, except for the up-front out-of-pocket costs paid by the generator which will be reimbursed through the credit, the generator can request premium interconnection service knowing that they will be fully reimbursed for such upgrades. An unintended consequence of this NOPR could be that transmission facilities are over built to the point that customers are not benefitted.

Although there are several states that have instituted retail competition, there are many states in which that action has not yet been taken. The FPSC is most concerned about the equity impacts in states with bundled retail service. In these instances, the socialization of network upgrade costs has the greatest potential of being disproportionately borne by those customers that are receiving minimal benefits.

Any benefits of competition, whether they be in the electric industry or elsewhere, arise mainly from cost causers paying their fair share. All else being equal, proper price signals are always preferable to costs being spread indiscriminately.

FPSC Recommendation. The FPSC recommends that the FERC allow states with bundled retail service to have the opportunity to ensure that system upgrade costs are properly allocated. Because Florida, as well as other states, has jurisdiction over retail rates, the state commission has the ability to address issues such as cost separation, allocation and socialization. Therefore, to promote effective wholesale competition, it is advisable for the FERC to acknowledge and memorialize states as regulatory partners on matters pertaining to network upgrade cost allocation.

Consistent with the FPSC's endorsement of an ongoing consultative and advisory role for state commissions, the FPSC urges the FERC to institute a consultative process for receiving and incorporating recommendations by states with bundled electric service into the development of FERC approved transmission rates.

In the context of a FERC filing for changes in rate schedules by a Transmission Provider operating in a state with bundled retail service, the respective state commission should be acknowledged as appropriately recommending network upgrade cost responsibility allocations to the FERC. The purpose of these allocations would be to set customer-specific transmission delivery service rates that more closely track cost causality. The FERC would institute a consultative process for receiving and incorporating the state recommendations into the development of approved transmission rates. In no instance shall the total amount (total revenue requirement) designed to be collected in transmission rates be modified as a result of using state commission cost responsibility allocations.

By properly allocating the costs to the wholesale customers, the Generators can still receive credits which can help encourage their market participation while the proper market signals can be preserved.

If the FERC is unwilling to adopt the recommended findings in Attachment A, the FPSC recommends that instead of eliminating the "but for" test, it be reinstated in states where electric service is still bundled. The alternative recommendation is that the "but for" test would be in existence until such time that unbundling occurs.

Indemnification for Taxes Imposed on Transmission Providers

In Section 5.14.3 of the IA, the FERC addresses the uncertainty surrounding whether contributions by Generators to Transmission Providers in connection with interconnection and

network facility construction will be considered non-taxable by the IRS. The FERC includes language in the IA that provides Transmission Providers with a generator reimbursement obligation in the form of an indemnification.

There appears to be some ambiguity in the last sentence of Article 5.14.3. The FPSC does not understand what the FERC intended by the clause that begins “. . . provided however, that Transmission Provider may require Generator to provide security” Our confusion starts with the beginning part of the sentence which seems to point to instances in which gross-up are allowed to be included in the amounts charged. We cannot discern how both grossing up the amount charged and requiring securitization at the same time makes sense. A clarification would be appreciated.

In some instances, for certain Generators and certain Transmission Providers, an indemnification will be enough to guarantee that retail ratepayers will not bear the ultimate responsibility for paying for this. For other Generators, an indemnification may not be adequate. Letters of credit, parental involvement or other forms of guarantees may be required to adequately protect retail ratepayers from becoming the default responsible party.

Because this has elements of a local issue with local consequences, the FPSC recommends that the indemnification treatment in the IA be subject to further review by the state, on a case by case basis, in the event that the Transmission Provider petitions the state commission for a more stringent standard (See Attachment A). The state should be able to best judge the acceptable risk to the ratepayer and weigh it against the harms of placing a more stringent financial requirement on the Generator.

Treatment of Unrefunded Amounts Paid by Generators for Network Upgrades

In Section 11.4.1 of the IA, the FERC addresses the treatment of unrefunded amounts paid by Generators for network upgrades. The FERC proposal includes the Transmission Provider

refunding all unrefunded amounts 5 years from the date the Network Upgrades are placed in service. The FPSC's modification of this section would change the 5 years to 10 and shift the risk to the Generator by requiring them to forego any unrefunded monies. The FPSC believes that this treatment is more appropriate because it recognizes that it can be reasonable to expect the pay back of this investment to take longer than 5 years and that the ultimate responsibility for the risk should lie with the Generator.

NOPR Reply Comments

Prior to the issuance of the NOPR, the FERC indicated that interconnection pricing issues would be addressed in a subsequent rulemaking. The FPSC strongly supports the FERC's decision to address interconnection pricing issues at this time because clearly, interconnection products, terms, and conditions cannot be divorced from the underlying pricing assumptions.

At the time the NOPR was being developed, many participants apparently did not fully explore the resolution of some issues because of a concern about violating the FERC's "non-price directive." One such issue may be queuing as discussed below. Solutions to the fundamental issues surrounding queuing are not fully fleshed out in the NOPR even though the queuing procedures are critical to the success of competition.

The queuing procedures in the NOPR perpetuate many uncertainties. For instance, in Section 4.4.5 of the IP, extensions of less than three cumulative years are not considered material. However, extending the commercial operation date for a Generator that is higher up in the queue may lead to the need for restudies for the Generators that are lower down in the queue. Thus, the number of times a Generator can be required to "buy" a study seems to be open-ended.

Extending these commercial operation dates can also cause Generators' network upgrade cost calculations to vary for significant periods of time without ever "locking in" until the Generator

moves to the top of the queue. These uncertainties could undermine the financial viability of Generators' projects and inadvertently cause a barrier to entry.

Because the queuing issue has not been fully explored up to this point (due to perceptions of it possibly being intertwined with pricing issues) and because of its importance, the FPSC expects that the parties will more fully address this issue in the current comment period. Therefore, it would be very helpful to add a round of reply comments to allow for a thorough analysis of any proposed refinements to the queuing procedure before final adoption of the rule.

Another area, Network Interconnection Service, is likely to be addressed by the comments and would benefit from an additional round of input to the FERC. There is at least one very important question about this new type of service which has yet to be addressed: What assumptions are to be used in the Interconnection Study of this kind of service? In other words, which generators or combinations of generators would appropriately be backed down in order to calculate what upgrades would be needed at times of peak or otherwise? Depending on the assumptions used in the studies, there may be a potential for overbuilding the transmission system when upgrades are made to allow every Generator to reach every delivery point with its maximum output.

In the event that the parties set forth their positions regarding the issues surrounding Network Interconnection Service, the FPSC would appreciate a reply comment period. The FPSC would like the opportunity to be able to intelligently weigh-in on whether there is a serious potential for overbuilding the transmission system and if so, what to do about it. At this point, the FPSC believes that there is not enough information available to make an informed judgement.

Conclusion

The FPSC is urging the development of a mechanism that would expand the opportunities for the FPSC to serve in a consultative and advisory capacity to the FERC on all issues related to bundled

electric service, approval of generation interconnection agreements, and other matters affecting Florida retail consumers. The FPSC is specifically promoting the adoption of such a process to accommodate state commission input on the important issue of cost allocation of interconnection upgrades in states where electric service remains bundled.

The FPSC is also recommending that the FERC accommodate regional differences by acknowledging and memorializing states as regulatory partners in the areas of reliability and indemnification for taxes imposed on Transmission Providers. We believe that by embracing state commissions as partners, FERC can fortify its efforts to promote competition while giving recognition to the importance of reliability, efficiency and fairness.

The FPSC is also recommending that the FERC recognize that it is reasonable to expect the payback of the interconnection upgrade investment to take as much as ten years and that the ultimate responsibility of the risk should be borne by the Generator.

Finally, the FPSC is recommending a period for NOPR reply comments before final adoption of the rule. In this way, the FERC can ensure that the full ramifications of at least the queuing and the Network Resource Interconnection Service issues have been thoroughly analyzed before final action is taken.

The FPSC continues to support the FERC in its endeavor to standardize generator interconnection agreements and procedures although the FPSC has reservations concerning the socialization of network interconnection upgrade costs in bundled retail states. While the FPSC questions the wisdom of codifying a policy that socializes these costs among the general body of ratepayers who did not directly cause the costs, the FPSC offers a unique compromise in which states with bundled retail service could review the cost allocation matter and provide input to the FERC. On this matter as well as others, we hope our comments will assist the FERC in its efforts to identify

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pro-competitive methods to address the unique needs of states and regions. We continue to value working with FERC in a collaborative manner on these and other important issues.

Respectfully submitted,

/ s /

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

DATED: June 14, 2002

- Proposed Modifications to the NOPR IA -

ARTICLE 3. REGULATORY FILINGS

3.1 Filing. The Transmission Provider shall file this Agreement (and any amendment hereto) with the state commission within which transmission service is provided and with any other appropriate Governmental Authority, if required. In states with statutory requirements to plan, develop, and maintain a coordinated electric power grid, the parties to this Agreement shall be subject to any modifications to the Agreement which are ordered by the state commission concerning reliability. In addressing reliability issues, states should give due consideration to the guidelines of the appropriate reliability council.

3.1.1 Confidentiality. Any information related to studies for interconnection asserted by Generator to contain competitively sensitive commercial or financial information shall be maintained by the Transmission Provider and identified as “confidential” under seal stating that Generator asserts such information is Confidential Information and has requested such information be kept under seal. If requested by the Transmission Provider, Generator shall provide the Transmission Provider, in writing, with the Generator’s basis for asserting that the information referred to in this Article 3.1 is competitively sensitive information, and the Transmission Provider may disclose such writing to the appropriate Governmental Authority. Generator shall be responsible for the costs associated with affording confidential treatment of such information.

3.1.2 Cooperation. If the Generator has executed this Agreement, or any amendment thereto, the Generator shall reasonably cooperate with Transmission Provider with respect to such filing and to provide any information reasonably requested by Transmission Provider needed to comply with applicable regulatory requirements. If the Generator has executed this Agreement or any amendment thereto, unless the Parties agree otherwise, Generator shall not protest the filing of this Agreement or any amendment which Generator executed.

Attachment A - Proposed Modifications to the NOPR IA (Continued)

11.4 Transmission Credits.

11.4.1 Refund of Amounts Advanced for Network Upgrades. Generator shall be entitled to a cash refund, equal to the total amount paid to Transmission Provider for the Network Upgrades, including any tax gross-up or other tax-related payments, and not refunded to Generator pursuant to Article 5.14.7 or otherwise, to be paid to Generator on a dollar-for-dollar basis, as payments are made under the Transmission Provider Tariff for transmission services with respect to the Facility. ~~Notwithstanding the foregoing, Transmission Provider shall refund all amounts paid by Generator for the Network Upgrades, together with interest, within five (5) years from the date the Network Upgrades are placed in service, so long as Transmission Provider continues to receive payments for transmission service with respect to the Facility during such period. Any amounts paid by Generator for the Network Upgrades and unrefunded after ten years from the date the Network Upgrades are placed in service shall be retained by Transmission Provider.~~ Any refund shall include interest calculated in accordance with the methodology set forth in FERC's regulations at 18 C.F.R. §35.19a(a)(2)(ii) from the date of any payment for Network Upgrades through the date on which the Generator receives a refund of such payment pursuant to this subparagraph. Generator may assign such refund rights to any person.

11.4.2 Allocation of Network Upgrade Costs. In the context of a FERC filing for changes in rate schedules by Transmission Provider operating in a state with bundled retail service, the respective state commission may recommend network upgrade cost responsibility allocations to the FERC. The purpose of these allocations is to set customer-specific transmission delivery service rates that more closely track cost causality. The FERC shall institute a consultative process for receiving and incorporating the state recommendations into the development of approved transmission rates. In no instance shall the total amount (total revenue requirement) designed to be collected in transmission rates be modified as a result of using state commission cost responsibility allocations.

11.4.23 Reservation of Rights. Notwithstanding any other provision of this Agreement, nothing herein shall be construed as relinquishing or foreclosing any rights, including but not limited to firm transmission rights, capacity rights, transmission congestion rights, or transmission credits, that the Generator, shall be entitled to, now or in the future under any other agreement or tariff as a result of, or otherwise associated with, the transmission capacity, if any, created by the Network Upgrades, including the right to obtain refunds or transmission credits for transmission service that is not associated with the Facility.

Attachment A - Proposed Modifications to the NOPR IA (Continued)

ARTICLE 5. INTERCONNECTION FACILITIES ENGINEERING, PROCUREMENT, AND CONSTRUCTION

5.14.3 Indemnification for Taxes Imposed Upon Transmission Provider. Notwithstanding Article 5.14.1, Generator shall protect, indemnify and hold harmless Transmission Provider from income taxes imposed against Transmission Provider as the result of payments or property transfers made by Generator to Transmission Provider under this Agreement, as well as any interest and penalties, other than interest and penalties attributable to any delay caused by Transmission Provider. On a case-by-case basis, Transmission Providers shall be afforded the opportunity to contest the financial adequacy of indemnification by petitioning the state commission within which the Generator requesting interconnection is located. State commissions may make findings regarding the appropriate form(s) of security in proceedings that afford all affected parties the benefits of due process. Transmission Provider shall not include a gross-up for income taxes in the amounts it charges Generator under this Agreement unless (i) Transmission Provider has determined, in good faith, that the payments or property transfers made by Generator to Transmission Provider should be reported as income subject to taxation or (ii) any Governmental Authority directs Transmission Provider to report payments or property as income subject to taxation; provided, however, that Transmission Provider may require Generator to provide security, in a form reasonably acceptable to Transmission Provider (such as a parental guarantee or a letter of credit), in an amount equal to Generator's estimated tax liability under this Article 5.14. Generator shall reimburse Transmission Provider for such taxes on a fully grossed-up basis, in accordance with Article 5.14.4, within thirty (30) Calendar Days of receiving written notification from Transmission Provider of the amount due, including detail about how the amount was calculated.

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

Standardizing Generator Interconnection) Docket No. RM02-1-000
Agreements and Procedures)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Comments of the Florida Public Service Commission will be sent by U.S. Mail to all parties on the attached service list.

/ s /

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

DATED: June 14, 2002

Service List
Docket No. RM02-1-000

Eugene G. Hanes, Fed. Affairs Advisor
Alabama Public Svc. Comm.
P.O. Box 991
Montgomery, AL 36101-0991

Sara C. Weinberg, Esq.
Vinson & Elkins, LLP
1455 Pennsylvania Ave., NW, Willard Office Bldg.
Washington, DC 20004-1008

Kevin F. Duffy
American Elec. Power Svc. Corp.
P.O. Box 16631
Columbus, OH 43216-6631

Daniel E. Frank
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Ave., NW
Washington, DC 20004-2404

Dorothy Capra, Director
American National Power, Inc.
65 Boston Post Rd., W
Marlborough, MA 01752-1872

Allen Mosher, Director
American Public Power Assoc.
2301 M St., NW, Third Floor
Washington, DC 20037-1427

Linda L. Walsh
Hunton & Williams
1900 K St., NW
Washington, DC 20006-1110

Barbara Muller Champion, Esq
Arizona Public Service Co.
P.O. Box 53999
Phoenix, AZ 85072-3999

Randall O. Cloward
Avista Corp.
P.O. Box 3727
Spokane, WA 99220-3727

Gary E. Guy
Baltimore Gas & Elec. Co.
39 W. Lexington St., Fl. 20
Baltimore, MD 21201-3940

Deborah J. Henry, Sr. Atty.
Allegheny Energy Supply Co., LLC
800 Cabin Hill Dr.
Greensburg, PA 15601-1650

Richard McMahan
Alliance of Energy Suppliers
701 Pennsylvania Ave., NW
Washington, DC 20004-2608

David Friedman, Director
American Forest & Paper Assoc.
1111 19th St., NW, Ste. 800
Washington, DC 20036-3603

Mark Krebs, Chairman
American Gas Cooling Ctr., Inc.
400 N. Capitol St., NW
Washington, DC 20001-1511

Jay T. Ryan, Esq.
Van Ness Feldman, P.C.
1050 Thomas Jefferson St., NW, Fl. 7
Washington, DC 20007-3837

Dale A. Landgren, VP & CSO
American Transmission Co., LLC
P.O. Box 47
Waukesha, WI 53187-0047

John D. McGrane
Morgan, Lewis & Bockius, LLP
1111 Pennsylvania Ave., NW
Washington, DC 20004

David E. Goroff
Bruder, Gentile & Marcoux, LLP
1100 New York Ave., NW, Ste., 510 East
Washington, DC 20005-3934

Gary A. Dahlke
Paine, Hamblen, Coffin, Brook & Miller
717 W. Sprague Ave., Ste. 1200
Spokane, WA 99201-3919

Barry Bennett
Bonneville Power Admin.
P.O. Box 3621
Portland, OR 97208-3621

Erik N. Saltmarsh, Chief Counsel
California Electricity Oversight Board
770 L St., Ste. 1250
Sacramento, CA 95814-3363

Stephen Greenleaf
CA Independent Sys. Oper. C
151 Blue Ravine Rd.
Folsom, CA 95630-4704

Thomas W. Kaslow
Calpine Corp.
The Pilot House, 2nd Flr.
Boston, MA 02110

George E. Johnson, Esq.
Calpine Corp.
2101 L St., NW
Washington, DC 20037-1594

Larry F. Eisenstat
Dickstein Shapiro Morin & Oshinsky, LLP
2101 L St. NW
Washington, DC 20037-1594

Michael P. Alcantar, Esq.
Alcantar & Kahl, LLP
468 Jackson St., Fl. 3
San Francisco, CA 94111-1619

Patrick E. McCullar, President
Delaware Municipal Elec. Corp., Inc.
860 Buttner Pl.
Dover, DE 19904-2405

Roger D. Fedman
Bingham Dana LLP
1120 20th St., NW
Washington, DC 20036-3406

George Johnson, Esq.
Dickstein Shapiro Morin & Oshinsky, LLP
2101 L St., NW
Washington, DC 20037-1594

Jeffrey M. Trepel
Duke Energy Corp.
422 S Church St.
Charlotte, NC 28242-0001

Clayton L. Smith
Dynergy Power Corp.
1000 Louisiana St., Ste. 5800
Houston, TX 77002-5006

Sidney Mannheim Jubien, Sr. Staff Counsel
California Electricity Oversight Bd.
770 L St., Ste. 1250
Sacramento, CA 95814-3363

Laurence G. Chaset, Staff Counsel
CA Public Util. Comm.
505 Van Ness Ave.
San Francisco, CA 94102-3214

Lisa Yoho, Director
Calpine Corp.
1350 Eye St., NW, Ste. 1270
Washington, DC 20005-3305

Joseph A. Regnery, Esq.
Calpine Corp.
2701 N Rocky Point Dr., Ste. 1200
Tampa, FL 33607-5938

Nicholas A. Giannasca
Huber Lawrence & Abell
Suite 1225, 1001 G St., NW
Washington, DC 20001-4545

Sharon K. Taft, Secretary
Covington & Burling
1201 Pennsylvania Ave., NW
Washington, DC 20004

Janice Lower
Duncan, Weinberg, Genzer & Pembroke, P.C.
Suite 800, 1615 M St., NW
Washington, DC 20036-3209

Sarah McKinley
E Cubed Co., LLC
215 E 79th St.
New York, NY 10021-0847

Carrie M. Safford
Dickstein Shapiro Morin & Oshinsky LLP
2101 L St., NW
Washington, DC 20037-1594

Gretchen Schott, Esq.
Duke Energy North America, LLC
5400 Westheimer Ct.
Houston, TX 77056-5310

Daniel A. King, Director & Reg. Counsel
Dynergy, Inc.
1500 K St., NW, Ste. 400
Washington, DC 20005-1241

Christina Forbes
Edison Elec. Inst.
701 Pennsylvania Ave., NW
Washington, DC 20004-2608

David B. Raskin
Steptoe & Johnson
1330 Connecticut Ave., NW
Washington, DC 20036-1704

John A. Anderson, Exec. Director
Electricity Consumers Resource Council
1333 H St., NW, West Tower Suite 800
Washington, DC 20005

Scott A. Castelaz, VP
Encorp, Inc.
1512 S Prairie Ave., Unit F
Chicago, IL 60605-2814

Kimberly Despeaux, Director
Entergy Svcs., Inc.
639 Loyola Ave.
New Orleans, LA 70113-3125

Walter C. Ferguson, Sr. Dir.
Entergy Wholesale Oper.
20 E. Greenway Plz., Ste. 500
Houston, TX 77046-2011

Susan S. DeSanti
Fed. Trade Comm.
600 Pennsylvania Ave., NW
Washington, DC 20580-0001

Gwendolyn K. Luciano, Director
FirstEnergy Corp.
76 S. Main St.
Akron, OH 44308-1812

Robert A. Birch, Manager
Fl Power & Light Co.
4200 W. Flagler St.
Miami, FL 33134-1606

James K. Wiley, Exec. Director
Fl Reliability Coord. Council
1408 W. Westshore Blvd., Ste. 1002
Tampa, FL 33607-4525

Louie J. Powell, Manager
GE Pwer Sys., Energy Consulting
1 River Road, Bldg. 2-623
Schenectady, NY 12345-6000

Donald S. McCauley, Counsel
McCauley Law Office
8 Grove St., Ste. 300
Wellesley, MA 02482-7797

Julie Simon, Director
Elec. Power Supp. Assoc.
1401 New York Ave., NW, Fl. 11
Washington, DC 20005-2102

Sara D. Schotland, Esq.
Cleary, Gottlieb, Steen & Hamilton
Suite 9000, 2000 Pennsylvania Ave., NW
Washington, DC 20006-1812

Evelyn Kahl, Esq.
Alcantar & Kahl, LLP
120 Montgomery St., Ste. 2200
San Francisco, CA 94104-4354

Heath K Knakmuhs, Atty.
Morgan, Lewis & Bockius, LLP
1111 Pennsylvania Ave., NW
Washington, DC 20004

Fergal H. McNamara, VP
ESBI Alberta Ltd.
900, 736 - 8th Ave., SW
Calgary Canada T2P 1H4

Michael R. Beiting, Assoc. General Counsel
FirstEnergy Corp.
76 S. Main St.
Akron, OH 44308-1812

Richard P. Sparling, Esq.
Swidler Berlin Shereff Friedman, LLP
3000 K St., NW, Ste. 300
Washington, DC 20007-5101

Gerard A. Clark
Skadden, Arps, Slate, Meagher & Flom, LLP
1440 New York Ave., NW
Washington, DC 20005-2111

Sheree W. Kernizan, Director
GA PSC
244 Washington St., SW
Atlanta, GA 30334-9007

Carol Chinn
GA Transmission Corp.
P.O. Box 2088
Tucker, GA 30085-2088

William D. DeGrandis, Esq.
Paul, Hastings, Janofsky & Walker, LLP
10th Floor, 1299 Pennsylvania Ave., NW
Washington, DC 20004-2400

William P. Scharfenberg, Atty.
Paul, Hastings, Janofsky & Walker, LLP
1299 Pennsylvania Ave., NW, Ste. 10
Washington, DC 20004-2400

Eugene J. Fava, Manager
Great Lakes Gas Transmission Co.
5250 Corporate Dr.
Troy, MI 48098-2644

Noel J. Darce, Atty.
Stone, Pigman, Walther, Wittman, et al.
546 Carondelet St.
New Orleans, LA 70130-3588

Gary A. Morgans
Idaho Power Co.
1330 Connecticut Ave., NW
Washington, DC 20036-1704

Donald R. Allen, Partner
Duncan & Allen
1575 Eye St., NW, Ste. 300
Washington, DC 20005-1105

Orlando B. Foote
Horton, Knox, Carter & Foote
895 Boradway St., Ste. 101
El Centro, CA 92243-2341

Thomas Williams, Esq.
Ingersoll-Rand Co.
P.O. Box 1008
Torrington, CT 06790-1008

Kathleen A. Carrigan, VP
ISO New England Inc.
1 Sullivan Rd.
Holyoke, MA 01040-2841

James M. D'Andrea, Esq.
KeySpan Ravenswood, Inc.
175 E. Old Country Rd.
Hicksville, NY 11801-4257

Jeffrey D. Watkiss, Esq.
Bracewell & Patterson, LLP
2000 K St., NW, Ste. 500
Washington, DC 20006-1809

Julian Brix
GA Transmission Corp.
P.O. Box 1349
Tucker, GA 30085-1349

M. Catharine Davis, Sr. Atty.
Great Lakes Gas Transmission Co.
5250 Corporate Dr.
Troy, MI 48098-2644

Ajay Garg, Sr. Advisor
Hydro One Networks, Inc.
483 Bay St.
Toronto Canada M5G 2P5

Roy L. Eiguren
Idaho Consumer-Owned Util. Assn.
P.O. Box 2720
Boise, ID 83701-2720

Barton L. Kline
Idaho Power Co.
1221 W. Idaho St.
Boise, ID 83702-5610

Kenneth R. Saline
K R Saline & Assoc.
160 N. Pasadena, Ste. 101
Mesa, AZ 85201-6764

Anthony W. Buxton
Preti Flaherty Beliveau Pachios & Haley
P.O. Box 1058
Augusta, ME 04332-1058

Kennerly Davis, Esq.
Hunton & Williams
Riverfront Plz., East Tower, 951 E. Byrd St.
Richmond, VA 23219-4040

Perry D. Robinson, Partner
Ballard Spahr Andrews & Ingersoll, LLP
601 13th St., NW, Ste. 1000, South
Washington, DC 20005-3807

Michael Schwerdtfeger, Asst. Gen. Counsel
Kinder Morgan Power Co., Inc.
1100 W. Town & Country Rd.
Orange, CA 92868-4600

Douglas F. John, Esq.
John & Hengerer
1200 17th St., NW, Ste. 600
Washington, DC 20036-3013

Michael S. Beer
LG&E Energy Corporation
220 W. Main St.
Louisville, KY 40202-1395

Noel J. Darce, Atty.
Stone, Pigman, et al.
546 Carondelet St.
New Orleans, LA 70130-3588

Wallace L. Duncan, Esq.
Duncan, Weinberg, Genzer & Pembroke, P.C.
1615 M St., NW, Ste. 800
Washington, DC 20036-3213

Suzan M. Stewart
MidAmerican Energy Co.
P.O. Box 778
Sioux City, IA 51102-0778

George M. Fleming, Gen. Counsel
Mississippi Pub. Util. Staff
P.O. Box 1174
Jackson, MS 39215-1174

James B. Ramsay, Gen. Counsel
National Assn. Of Reg. Util. Cmmrs.
1101 Vermont Ave., NW, Ste. 200
Washington, DC 20005-3553

Christopher J. Barr
Morgan, Lewis & Bockius, LLP
1111 Pennsylvania Ave., NW
Washington, DC 20004-2541

Joel DeJesus, Counsel
National Grid USA Svc. Co., Inc.
25 Research Drive
Westborough, MA 01582-0001

Wallace F. Tillman, Gen. Counsel
National Rural Elec. Coop. Assoc.
4301 Wilson Blvd.
Arlington, VA 22203-1867

David T. Doot
Day, Berry & Howard, LLP
CityPlace I
Hartford, CT 06103-3499

Jeff E. Parker, Gen. Counsel
Nevada Pub. Util. Comm.
1150 E. William St.
Carson City, NV 89701-3109

Donald F. Santa, Jr.
Troutman Sanders, LLP
401 9th St., NW, Ste. 1000
Washington, DC 20004-2146

Diana Mahmud, Dep. Gen. Counsel
Metropolitan Water Dist. Of Southern CA
P.O. Box 54153
Los Angeles, CA 90054-0153

Ernest Hahn, Sr. Resource Spec.
Metropolitan Water Dist. Of Southern CA
P.O. Box 54153
Los Angeles, CA 90054-0153

Lori A. Spence
Midwest Indep. Trns. Sys. Oper.
701 City Center Dr.
Carmel, IN 46032-7574

Sharla M. Barklind, Asst. Gen. Counsel
NARUC
1101 Vermont Ave., NW, Ste. 200
Washington, DC 20005-3521

Alice A. Curtiss, Atty.
National Fuel Gas Dist. Corp.
10 Lafayette Sq.
Buffalo, NY 14203-1826

Frank M. Dale, Jr.
Swidler Berlin Shereff Friedman, LLP
Jefferson Court
1025 Thomas Jefferson St., NW, Ste. 600, East
Washington, DC 20007

Stephen C. Palmer
Swidler Berlin Shereff Friedman, LLP
3000 K St., NW
Washington, DC 20007-5109

William K. Edwards
National Rural Util. Cooperative
2201 Cooperative Way
Herndon, VA 20171-4583

Connie L. Westadt, Assoc. Gen. Counsel
Nevada Power Co.
P.O. Box 10100
Reno, NV 89520-0024

Harvey L. Reiter
Morrison & Hecker, LLP
1150 18th St., NW, Ste. 800
Washington, DC 20036-3845

Debra J. Dreibelbis, Associate
Day, Berry & Howard LLP
CityPlace I
Hartford, CT 06040

Kurt W. Adams, Esq.
Bernstein, Shur, Sawyer & Nelson
P.O. Box 9729
Portland, ME 04104-5029

Robert E. Fernandez, Gen. Counsel
NY Indep. Sys. Oper., Inc.
3850 Carman Rd.
Schenectady, NY 12303-5608

Ronald Liberty, Director
NY PSC
3 Empire State Plz
Alabany, NY 12223-1000

Elias G. Farrah, Esq.
LeBoeuf, Lamb, Greene & MacRae, LLP
1875 Connecticut Ave., NW, Ste. 1200
Washington, DC 20009-5715

Debra A. Palmer
Schiff Hardin & Waite
Suite 600, 1101 Connecticut Ave., NW
Washington, DC 20036-4303

Edward A. Schwerdt, Exec. Director
NE Power Coord. Council
1515 Broadway Fl 43
New York, NY 10036-8901

Joseph M. DeVito
NRG Companies
901 Marquette Ave., Ste. 2300
Minneapolis, MN 55402-3265

Paul Savage
NRG Energy, Inc.
901 Marquette Ave., Ste. 2300
Minneapolis, MN 55402-3265

Neven Rabadjija
NSTAR Elec. & Gas Corp.
800 Boylston St.
Boston, MA 02199-8001

Glen L. Ortman
Morrison & Hecker, LLP
1150 18th St., NW, Ste. 800
Washington, DC 20036-3845

Beth A. Nagusky, Exec. Dir.
New England Renewable Pwr. Prod. Assn.
P.O. Box 743
Augusta, ME 04332-0743

Cecilia Rios, Paralegal
New Mexico Publ. Reg. Comm.
P.O. Box 1269
Santa Fe, NM 87504-1269

Arnold H. Quint
Hunton & Williams
1900 K St., NW, Ste. 1200
Washington, DC 20006-1109

Lawrence G. Malone
NY PSC
3 Empire State Plz
Albany, NY 12223-1000

Stephen R. Melton, VP
NiSource Corp. Svcs. Co.
2603 Augusta Dr., Ste. 125
Houston, TX 77057-5637

Margaret Caffey-Moquin, Assoc. Gen. Counsel
NM Pub. Reg. Comm.
P.O. Box 1269
Santa Fe, NM 87504-1269

Shelly Richardson, Atty.
NW Requirements Util.
825 NE Multnomah St., Ste. 1135
Portland, OR 97232-2170

Elizabeth I. Goodpaster, Atty.
Leonard, Street & Deinard, PA
150 S 5th St., Ste. 2300
Minneapolis, MN 55402-4200

James J. Betrand, Esq.
Leonard Street & Deinard
150 S 5th St., Ste. 2300
Minneapolis, MN 55402-4223

Denise A. Bode, Chairman
Oklahoma Corp. Comm.
P.O. Box 52000
Oklahoma City, OK 73152-2000

Jackson E. Reasor, President
Old Dominion Elec. Coop.
P.O. Box 2310
Glen Allen, VA 23058-2310

Mike L. Hern
Old Dominion Elec. Coop.
4201 Dominion Blvd., Ste. 200
Glen Allen, VA 23060-6743

John Reese
Orion Power Holdings, Inc.
49 Linda Ct.
Delmar, NY 12054-3516

W. Thaddeus Miller
Orion Power Holdings, Inc.
10th Fl., 7 E Redwood St.
Baltimore, MD 21202-1115

Robert J. Doran
Pacific Gas & Elec. Co.
77 Beale St., MC B13L, Rm. 1345
San Francisco, CA 94105-1814

Aleka K Scott, Manager
Pacific NW Generating Coop.
711 NE Halsey St., Ste. 200
Portland, OR 97232-1268

Vilna Waldron Gaston, Manager
PECO Energy Co.
2301 Market St., #S6-2
Philadelphia, PA 19103-1338

Richard A Drom, Gen. Counsel
PJM Interconnection LLC
Valley Forge Corp. Ctr., 955 Jefferson Ave.
Norristown, PA 19403-2410

Terry V Spencer
Allegheny Power
800 Cabin Hill Dr.
Greensburg, PA 15601-1650

Michele L. Farrell, FERC Coord.
Portland Gen. Elec. Co.
121 SW Salmon St., #1WTC0301
Portland, OR 97204-2901

Allen C. Barringer, Esq.
Potomac Elec. Power Co.
701 9th St., NW, Ste. 1000
Washington, DC 20068-0001

Paul E Russell, Esq.
PPL Electric Util. Corp.
2 N 9th St.
Allentown, PA 18101-1139

Mitchell F. Hertz, Esq.
Kirkland & Ellis
655 15th St., NW, Ste. 1200
Washington, DC 20005-5701

Neil L. Levy, Esq.
Kirkland & Ellis
655 15th St., NW, Ste. 1200
Washington, DC 20005-5701

Scott M. Helyer, Manager
Tenaska, Inc.
1701 E. Lamar Blvd., Ste. 100
Arlington, TX 76006-7303

Mark D. Patrizio, Atty.
Pacific Gas & Elec. Co.
P.O. Box 7442
San Francisco, CA 94120-7442

Gerit F. Hull, Atty.
PacifiCorp
825 NE Multnomah St., Ste. 1700
Portland, OR 97232-2135

Karilee S. Ramaley, Sr. Atty.
Pinnacle West Capital Corp.
400 N 5th St., MS 8695
Phoenix, AZ 85004-3902

Michael J. Thompson
Wright & Talisman, PC
Ste. 600, 1200 G St., NW
Washington, DC 20005-3814

J R George, Asst. Gen. Counsel
Portland Gen. Elec. Co.
121 SW Salmon St., #1WTC0301
Portland, OR 97204-2901

William J. Nicholson, Manager
Potlatch Corp.
Suite 610, 244 California St.
San Francisco, CA 94111-4302

Ray Nelson
Power Resource Managers, LLC
2100 - 12th Ave., NE
Bellevue, WA 98004-2911

Kendal C Bowman, Esq.
Progress Energy Svc. Co.
P.O. Box 1551
Raleigh, NC 27602-1551

Peter K. Matt of Counsel
Bruder, Gentile & Marcoux, LLP
Suite 510, 1100 New York Ave., NW
Washington, DC 20005-3934

Terry R. Black, Atty
Project for Sustainable FERC Energy Pol
107 Roberts Ct.
Alexandria, VA 22314-4664

Lon L. Peters, President
Publ. Generating Pool
6765 SW Preslynn Dr.
Portland, OR 97225-2668

Judy Moore, Corp. Counsel
Pub. Svc. Co. of New Mexico
Alvarado Sq. 0806
Albuquerque, NM 87158-0001

Jan Karlak, Util. Dept.
Public Util. Comm. Of Ohio
180 E Broad St., Fl. 3
Columbus, OH 43215-3707

Michael G. Briggs, Sr. Counsel
Reliant Energy
801 Pennsylvania Ave., NW, Ste. 620
Washington, DC 20004-2615

Arlen Orchard, Esq.
Sacramento Municipal Util. Dist.
6201 S. St.
Sacramento, CA 95817-1818

Kelly J Barr
Salt River Proj. Agri. Imp. & P.D.
1521 N Project Dr.
Tempe, AZ 85281-1206

James F. Walsh, III
San Diego Gas & Elec. Co.
101 Ash St.
San Diego, CA 92101-3017

Stacy Van Goor, Atty.
Sempra Energy
101 Ash St.
San Diego, CA 92101-3017

Scott G. Silverstein
Sithe Energies, Inc.
335 Madison Ave., 28th Fl.
New York, NY 10017-4605

David M. Connelly, Esq.
Bruder, Gentile & Marcoux, LLP
1100 New York Ave., NW
Washington, DC 20005-3934

Jodi L. Moskowitz
PSEG Svcs. Corp.
P.O. Box 570
Newark, NJ 07101-0570

Denise Peterson, Sr. Counsel
Public Pwr Council
1500 NE Irving St., Ste. 200
Portland, OR 97232-2267

Thomas W. McNamee, Asst. Atty. Gen.
Pub. Util. Comm. Of Ohio
180 E. Broad St., Fl. 9
Columbus, OH 43215-3707

Steven E. Pope
Perkins Coie LLP
411 108th Ave., NE, Ste. 1800
Bellevue, WA 98004-8404

John Meyer, VP
Reliant Resources, Inc.
1111 Louisiana 15th Fl.
Houston, TX 77002

Glen L. Ortman
Morrison & Hecker, LLP
1150 18th St., NW, Ste. 800
Washington, DC 20036-3845

Clinton A. Vince
Sullivan & Worcester, LLP
1666 K St. NW, Ste. 700
Washington, DC 20006-1208

Nicholas W. Fels, Esq.
Covington & Burling
P.O. Box 7566
Washington, DC 20044-7566

Connie L. Westadt
Sierra Pacific Power Co.
P.O. Box 10100
Reno, NV 89520-0024

Eric L. Christensen, Assoc. Gen. Counsel
Snohomish County PUD No. 1
P.O. Box 1107
Everett, WA 98206-1107

Richard S. Brent, Director
Solar Turbines, Inc.
818 Connecticut Ave., NW, Ste. 600
Washington, DC 20006-2702

Jennifer L. Key
Steptoe & Johnson, LLP
1330 Connecticut Ave., NW
Washington, DC 20036-1704

S. Chris Still
Balch & Bingham, LLP
P.O. Box 306
Birmingham, AL 35201-0306

Peter C. Lesch, Esq.
Gallagher, Boland & Meiburger
Suite 900, 1023 15th St., NW
Washington, DC 20005-2602

George H. Williams, Jr.
Cameron McKenna, LLP
2175 K St., NW, Fl. 5
Washington, DC 20037-1831

Wallace L. Duncan, Esq.
Duncan, Weinberg, Genzer & Pembroke, PC
1615 M St., NW, Ste. 800
Washington, DC 20036-3213

Erik B. Bakker
Tucson Elec. Pwr. Co.
1 S. Church Ave.
Tucson, AZ 85701-1612

Tom Oney
Hunton & Williams
1601 Bryan St., Fl. 30
Dallas, TX 75201-3401

Mark C. Morrow
UGI Util., Inc.
460 N. Gulph Rd.
King of Prussia, PA 19406-2815

Blaine D. Stockton, Jr.
USDA - RUS, Elec. Program
US Dept. of Agriculture
1400 Independence Ave., SW
Washington, DC 20250-0002

Wade H. Robert, VP
UTC Pwr, a United Tech. CorpDiv
Suite 600, 1401 Eye St., NW
Washington, DC 20005-2225

Margaret L. Sommers
Southern CA Edison Co.
P.O. Box 800
Rosemead, CA 91770-0800

John E. Lucas, Manager
Southern Co. Svcs., Inc.
P.O. Box 2625
Birmingham, AL 35202-2625

Lori Glover, Director
Stirling Energy Systems
2920 E. Camelback Rd., Ste. #150
Phoenix, AZ 85016-4408

Jose A. Rotger, Manager
TransEnergie US Ltd.
110 Turnpike Rd., Ste. 300
Westborough, MA 01581-2808

James H. Pope, Chairman
Transmission Agency of Northern CA
P.O. Box 15129
Sacramento, CA 95851-0129

Antione P. Cobb, Atty.
Troutman Sanders LLP
401 9th St., NW, Ste. 1000
Washington, DC 20004-2134

Robert Spangler
TXU Energy Trading Co.
1717 Main St., Ste. 2000
Dallas, TX 75201-4605

John W. Jimison, Esq.
US Combined Heat & Pwr. Assoc.
1225 19th St., NW, Ste. 800
Washington, DC 20036-2489

Paul M. Stolpman, Director
US EPA
1200 Pennsylvania Ave., NW (6201J)
Washington, DC 20460-0001

Karen L. Larsen, Analyst
USDA - RUS, Elec. Program
US Dept. of Agriculture
1400 Independence Ave., SW
Washington, DC 20250-0002

Michael Luz, Marketing Director
Vericor Pwr Systems
3625 Brookside Pkwy., Ste. 500
Alpharetta, GA 30022-3717

Robert R. Winter
West Penn Pwr Co. - Central Services
800 Cabin Hill Dr.
Greensburg, PA 15601-1650

Tami Pelton, Admin. Asst.
Western Area Pwr Admin
P.O. Box 281213
Lakewood, CO 80228-8213

Amy L. Sheridan
Williams Energy Marketing & Trading Co.
Suite 4100, MS 41-3 - 1 Williams Ctr
Tulsa, OK 74172-0140

Arthur W. Iler, Esq.
Wisconsin Elec. Pwr. Co.
231 W Michigan St
Milwaukee, WI 53290-0001

Susan Earley
Western Area Pwr Admin
P.O. Box 281213
Lakewood, CO 80228-8213

Terence L. Mundorf
Western Pub Agencies Grp
16000 Bothell Everett Hwy., Ste. 160
Mill Creek, WA 98012-1514

James R. Keller, Director
Wisconsin Elec. Pwr Co.
P.O. Box 2046
Milwaukee, WI 53201-2046

William M. Dudley
Xcel Energy Svcs., Inc.
1099 18th St., Ste. 3000
Denver, CO 80202-1930