

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Allegheny Electric Cooperative, Inc., <i>et al.</i>	)	
	)	
v.	)	Docket No. EL07-56-000
	)	
PJM Interconnection, L.L.C.	)	
	)	
Organization of PJM States, Inc., <i>et al.</i>	)	
	)	
v.	)	Docket No. EL07-58-000
	)	(Consolidated)
PJM Interconnection, L.L.C.	)	

**REQUEST FOR REHEARING  
OF THE ORGANIZATION OF PJM STATES, INC.**

Pursuant to Rules 212 and 713 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission" or "FERC"), 18 C.F.R. §§ 385.212 and 385.713 (2007), the Organization of PJM States, Inc., Delaware Public Service Commission, District of Columbia Public Service Commission, Indiana Utility Regulatory Commission, Kentucky Public Service Commission, Maryland Public Service Commission, New Jersey Board of Public Utilities, North Carolina Utilities Commission, Public Utilities Commission of Ohio, Pennsylvania Public Utility Commission and Virginia State Corporation Commission (collectively, "OPSI")<sup>1</sup> hereby request rehearing of the "Order on Settlement Offer and Complaints" issued by the Commission on September 20,

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<sup>1</sup> The Illinois Commerce Commission, Michigan Public Service Commission and the West Virginia Public Service Commission, each a member of OPSI but not an individually-named complainant in OPSI's original complaint, have reviewed and support this Request for Rehearing.

2007, in the above-captioned proceeding.<sup>2</sup> OPSI respectfully requests that the Commission issue an order on rehearing finding that PJM has violated the terms of its tariffs and permitting the parties full access to discovery in order to more fully develop a factual record in these consolidated proceedings.

## **I. STATEMENT OF ISSUES/SPECIFICATION OF ERRORS**

In support of its request for rehearing, OPSI asserts that:

1. The Commission erred in the September 20 Order by basing its finding that PJM had not violated the terms of Attachment M of its tariff on an inadequately-developed factual record.
2. The Commission erred in the September 20 Order by concluding that PJM had not violated the terms of its tariff.
3. The Commission erred in the September 20 Order by unduly relying on the opinion of the PJM Market Monitor that PJM had apparently not violated its tariff.

## **II. BACKGROUND**

On April 23, 2007, OPSI filed a complaint requesting fast track consideration and a hearing, alleging that PJM had acted to impair the independence and effectiveness of its Market Monitoring Unit in violation of the PJM Market Monitoring Plan contained in Attachment M to PJM's Open Access Transmission Tariff, as well as the Commission's Orders and the Federal Power Act. PJM filed an Answer arguing that the Commission should either dismiss the complaint or hold it in abeyance until PJM completed its own "independent"

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<sup>2</sup> 120 FERC ¶ 61,254 (2007)(the "September 20 Order").

investigation of the allegations giving rise to the Complaint.<sup>3</sup> By Order issued May 18, 2007, the Commission issued ten data requests to PJM and Joseph E. Bowring, Market Monitor for PJM, and deferred action on OPSI's request for interim relief until receipt of the responses to these data requests.<sup>4</sup>

PJM and Dr. Bowring submitted their separate responses to the initial data requests on June 12, 2007. In his responses, Dr. Bowring detailed multiple instances wherein PJM sought to prevent the MMU from communicating candidly and freely with market participants and state commissions about matters relating to appropriate wholesale market design, the exercise of market power and other relevant issues, although such communications are authorized by tariff.<sup>5</sup> PJM, on the other hand, asserted that it had not interfered with the market monitor's operation or independence and that any appearance to the contrary was the result of standard internal PJM collaboration and peer review.<sup>6</sup>

On July 2, 2007, PJM filed a supplemental response to Dr. Bowring's affidavit and response to the Commission's data requests in which PJM stepped up its criticism of the market monitor, claiming that Dr. Bowring was misconstruing peer review and internal corporate management as interference in a campaign to

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<sup>3</sup> PJM Answer at 1. Although PJM indicated its internal investigation would be concluded within 60 days and a comprehensive report submitted to the Commission, OPSI has not been provided access to any part of this investigation some 6 months later and is not aware that any report, comprehensive or otherwise, has been provided to anyone. *Allegheny Electric Coop., et al. v. PJM Interconnection, L.L.C.*, Docket No. EL07-56-000, Letter from PJM Board of Managers to Chairman Joseph T. Kelliher at 1 (April 17, 2007).

<sup>4</sup> Order Consolidating Proceedings, Issuing Data Requests and Related Matters, 119 FERC ¶ 61,165.

<sup>5</sup> See, e.g., Bowring Affidavit at 2-5.

<sup>6</sup> PJM Response to Commission data requests ("PJM June 12 Response") at 1.

obtain additional independence from PJM management.<sup>7</sup> PJM requested that the Commission dismiss the complaints, contending that it had not violated its tariff or the Commission's mandates regarding RTO market monitoring.<sup>8</sup> OPSI and Dr. Bowring each responded to PJM's July 2, 2007 filing, arguing that the evidence submitted to date indicates that PJM had, in fact, violated the terms of its tariff, and requesting that the Commission set this matter for hearing so as to allow for further investigation of disputed facts through discovery.<sup>9</sup>

On August 2, 2007, PJM, pursuant to Rule 602 of the Commission's Rules,<sup>10</sup> filed a contested unilateral Offer of Settlement, purporting to resolve outstanding issues in these two consolidated complaints (seems unnecessary to restate at this date). On August 22, 2007, pursuant to Rule 602, OPSI submitted Comments opposing the proposed settlement as filed.<sup>11</sup> A number of additional parties to these proceedings likewise submitted comments on August 22, 2007.

On September 4, 2007, PJM submitted Reply Comments responding to the initial comments of OPSI and the other parties and reiterating its initial position that the Commission should approve the proposed Offer of Settlement without additional hearings or opportunity for discovery.<sup>12</sup> In the alternative, PJM proposed that the Commission refer this matter to a Settlement Judge for

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<sup>7</sup> PJM Supplemental Response ("PJM July 2 response") at 7-8.

<sup>8</sup> *Id.* at 26.

<sup>9</sup> Letter to the Commission from Dr. Joseph Bowring, July 10, 2007, at 2; OPSI Answer to PJM Motion to Dismiss at 6.

<sup>10</sup> 18 C.F.R. § 385.602.

<sup>11</sup> The Illinois Commerce Commission, the Michigan Public Service Commission and the West Virginia Public Service Commission, each a member of OPSI but not an individually-named complainant in OPSI's original complaint, also supported OPSI's initial comments opposing the PJM Offer of Settlement.

<sup>12</sup> PJM Reply Comments at 1.

additional proceedings pursuant to Rule 603.<sup>13</sup> PJM further proposed that the Commission issue “an initial order providing guidance on the policy issues raised in the settlement comments,” which would serve to strictly limit the confines of any settlement negotiations.<sup>14</sup> On September 12, 2007, OPSI filed a response to PJM’s Reply Comments, requesting that the Commission reject PJM’s Offer of Settlement in its current form and return the matter to the parties for multilateral negotiations. OPSI further requested that, if such negotiations prove unsuccessful, the Commission set this matter for hearing, allow appropriate discovery, and grant the request for interim relief set forth in OPSI’s initial complaint.

In the September 20 Order, the Commission concluded, based on the existing record, that PJM had not violated its tariff by restricting staffing levels within the MMU, restricting MMU access to internal PJM data, failing to cooperate with the MMU or altering the role of the MMU within internal PJM governance and operations. The Commission determined that “[w]hile the evidence does not support allegations of tariff violations, the evidence raises serious questions as to whether the tension between PJM management and the Market Monitor prevents a workable relationship between the two and thus may compromise the ability of the MMU to perform its tariff-defined functions.”<sup>15</sup> Consequently, the Commission found that the PJM tariff, by requiring the MMU

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<sup>13</sup> *Id.* at 3.

<sup>14</sup> *Id.* at 2-3.

<sup>15</sup> September 20 Order at ¶ 56.

to report to RTO senior management rather than the PJM Board, was not demonstrated to be just and reasonable.

Based on these factual determinations, the Commission directed PJM, OPSI and the other parties to these proceedings to attempt to reach consensus on issues related to the structure of the PJM MMU. The Commission denied OPSI's request for interim relief and request for an open investigation with discovery. In addition, the Commission rejected PJM's proposed Offer of Settlement and its alternative request for a "policy order" predetermining certain issues raised by OPSI and others (although the Commission did state that it believed it had the proper authority to do so under the Federal Power Act).

### **III. REQUEST FOR REHEARING**

#### **A. The Commission Erred By Failing to Permit the Parties to Fully Develop the Factual Record.**

The Commission erred in failing to provide the parties the opportunity to investigate fully the allegations raised by Dr. Bowring at the Commission's April 5, 2007 technical conference on market monitoring policies. OPSI commends the Commission for issuing data requests to PJM and Dr. Bowring and for evaluating the data submitted in response to such requests. However, OPSI submits that this limited investigation, while certainly well-intended, was not adequate to develop the sort of factual record necessary to allow the Commission to determine that PJM had not violated its tariff. This is particularly important where, as here, the confidence of the public and market participants in the

wholesale markets has been severely compromised by the alleged actions of a Commission-approved RTO.

OPSI has repeatedly requested access to the discovery procedures set forth in the Commission's Rules, in order to investigate the allegations regarding interference with the MMU's independence, but has been continuously rebuffed. In its original complaint, OPSI requested the Commission set the matter for hearing pursuant to the Commission's rules for fast-track processing. Following the Commission's release of data requests to PJM and Dr. Bowring, OPSI suggested additional questions that PJM and the Market Monitor be directed to answer.<sup>16</sup> OPSI opposed PJM's unilateral settlement offer, and requested that the Commission, following a reasonable period of multilateral negotiations, set the matter for hearing, with the discovery rights attendant thereto.

It is thus clear that the Commission's limited investigation to date could be easily supplemented in the interests of developing a more complete record, and that the Commission has heretofore refused to avail itself of this opportunity by permitting OPSI to develop fully the factual record herein, as OPSI repeatedly has sought to do. The Commission's own review of the documents submitted in response to its initial data requests suggests numerous areas ripe for follow-up questioning. For example, in discussing the transfer of MMU employees out of the MMU and into PJM's Market Services division under controversial

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<sup>16</sup> Answer of the Organization of PJM States, Inc. to March 24, 2007 Motion of Joseph Bowring for Extension of Time and Motion to Supplement Commission Data Requests, filed May 25, 2007.

circumstances, the Commission refers to interviews of the affected employees by PJM management. Questioning of these employees under the auspices of a Commission investigation or other discovery mechanism (and away from the senior RTO management upon whom the livelihood of such employees depends) would more fully establish whether MMU personnel were pressured to leave the MMU, thus compromising the independence of the unit.

Similarly, while the documents submitted to the Commission suggest that PJM threatened to remove the MMU's database from the exclusive control of the MMU, but did not actually transfer stewardship of the database to RTO senior management, an investigation of PJM's conduct with regard to MMU data has never been conducted. By permitting OPSI and the other parties to these proceedings to issue data requests or depose PJM personnel, the Commission could be assured that it fully understands what did and what did not happen with regard to MMU access to information.

Moreover, while the Commission's data requests and the documents filed in response thereto provide some background regarding the specific instances previously raised by Dr. Bowring in which PJM is alleged to have interfered with production of MMU reports, a full and complete evaluation of these allegations has never been conducted. Neither the parties nor the Commission has been able to develop a full record on these allegations. The parties have not been permitted follow up the Market Monitor's initial allegations to attempt to uncover other cases of interference and the Commission appears to have chosen not to do so



itself. As the Commission is aware, the discovery process set forth in its Rules often leads to the discovery of additional relevant information, which provides proof of existing allegations or evidence of altogether different events.

In each of these instances, OPSI does not know what information will be uncovered, as it has to date not been permitted to issue a single data request or ask a single question of a deponent. OPSI represents, however, that a thorough discovery process would result in a more complete factual record in which the market could have confidence. By allowing OPSI and others to contribute to a factual record, the Commission would be assured that the public regains some of the support for wholesale markets that has been lost throughout this process. Allowing such discovery would not unduly delay the Commission's determination regarding the future structure of the MMU. The Commission and interested market participants have extensive experience with Commission discovery procedures, which have operated smoothly in untold litigated Commission proceedings. Furthermore, allowing discovery need not delay multilateral negotiations of the sort required by the September 20 Order, and would in fact be quite helpful in fashioning an appropriate remedial structure for the PJM MMU.

**B. The Commission Erred In Concluding That PJM Had Not Violated The Terms Of Its Tariff.**

As discussed above, it is clear that the factual record developed to date is inadequate to allow the Commission to fully evaluate whether PJM has violated its tariff. Setting this matter for hearing and allowing the parties to engage in

discovery is the only way the Commission could ensure that all violations of Attachment M are uncovered. Nevertheless, it is clear from the record that does exist that PJM has engaged in a pattern of conduct with the express intention of interfering with the independent operation of its MMU, conduct which does violate both PJM's Attachment M and general Commission policy.

First and foremost, OPSI submits that PJM need not have succeeded in its attempts to interfere with, muzzle or otherwise sidetrack the Market Monitor in order to have violated Commission policy and its tariff. Merely attempting to do so is violation enough. Merely attempting to silence the MMU or to change the written opinions of the MMU is enough to severely harm public confidence in the PJM wholesale market, one of the core rationales for existing Commission policy. The same is true of other actions PJM admits to taking, albeit apparently unsuccessfully, such as PJM's attempt to remove control over the MMU's data from the MMU itself. Whether additional "chilling" activities by PJM management or personnel have been attempted or have occurred cannot be conclusively dismissed based on the meager record thus far developed. OPSI simply has not been permitted to look into these allegations at all, and the Commission has not looked very hard.

The existing record, scant though it is, demonstrates at minimum additional ongoing attempts by PJM to silence the MMU or censor MMU opinions. According to the affidavit of Dr. Bowring and its supporting documentation, PJM in March 2006 implemented a secret internal set of procedures ("Internal

Procedures”), prescribing the terms under which the MMU would implement Attachment M.<sup>17</sup> These procedures specifically intend to muzzle the MMU. The PJM Market Monitor protested internally to PJM senior management that the Internal Procedures violated Attachment M, to no avail.<sup>18</sup> An examination of these detailed procedures indicates that they effectively subject the PJM MMU to detailed supervision, oversight and review, not only by PJM Senior Management, but by the PJM manager in charge of the “Markets Division.”

These procedures were and are wholly incompatible with any notion of independence and subject the PJM Market Monitor to detailed day to day review, objection and the exercise of editorial powers by PJM senior management in the smallest matters, effectively placing the PJM market monitor directly under the day to day control of the PJM Executive Vice President, and requiring the Market Monitor to seek prior approval for almost any significant action or communication.

The Internal Procedures thus represent a significant, extra-tariff diminution of the MMU’s independence, authority and responsibilities specified in Attachment M and therefore constitute a violation of the Commission-approved PJM OATT. The Internal Procedures both deprive the MMU of some of the market monitoring responsibilities and authority provided under the tariff, such as the provision that the MMU shall have access to “any other information that is in

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<sup>17</sup> Affidavit of Dr. Joseph Bowring to the Commission (“Bowring Affidavit”), July 12, 2007, at 5.

<sup>18</sup> Bowring Affidavit Exhibits, SMM 261 – 278, SMM 288 – 363.

the possession of PJM,” and include restrictions on MMU authority not provided in the tariff or approved by the Commission, such as requirements that the MMU “shall notify,” “shall consult with,” “shall inform,” “shall submit,” and “shall provide ... in advance” to the PJM President nearly all contemplated reports and intended activities prior to publishing the same. These requirements cover the entirety of the MMU’s tariff duties - from notification and referrals to the Commission to the MMU’s responsibilities to assess and recommend modifications to PJM market rules - and directly impinge upon the independence of action afforded the MMU under the PJM tariff.<sup>19</sup>

The existing record also proves that PJM used its editorial control over the MMU in inappropriate ways. PJM edited the 2005 State of the Market Report to remove conclusions about market concentrations in the regulation market over the Market Monitor’s protest at the specific instruction of the PJM Executive Vice President.<sup>20</sup> It is also clear that this interference was not a recent phenomenon, but was part of a longstanding campaign of interference. A series of emails between the market monitor, PJM attorneys, engineers and governmental relations representatives in 2005 over the draft text of the PJM market monitor’s declaration to the Commission on the PJM regulation market ultimately resulted in the market monitor removing his expert recommendations from the document.<sup>21</sup> The

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<sup>19</sup> SMM 00291 to 00301; PJM OATT, Attachment M at Section VI. A. See SM 00261 to 00278, Bowring memo dated December 29, 2006, detailing the Internal Procedures’ modifications of the PJM Market Monitoring Plan, Attachment M to the OATT.

<sup>20</sup> SMM 364.

<sup>21</sup> SMM 395 – 501.

ensorship of the MMU also extended to MMU communications to stakeholder committees, as when the Market Monitor was barred from posting presentation materials prior to a stakeholder committee meeting that PJM management deemed to be “inflammatory.”<sup>22</sup>

PJM’s interference with the MMU was not limited to censorship of MMU presentations, but extended to taking authority away from the MMU. On March 19, 2007, PJM transferred responsibility for the Cost Development Task Force (CDTF) and the chair of the CDTF from the MMU to the Market Services division. The CDTF is charged in part with the development and constitution of the cost-based offers that apply when there is a determination of market power. The MMU is responsible for determining the presence of market power in the PJM market and for determining whether price offers from market participants are competitive; that is, determining whether the price offers approximate the marginal cost of the commodity or service offered into the market. The markup above marginal cost is a critical barometer of competitiveness of the market; the costs comprising the cost offer are thus an essential component necessary to determining competitive outcomes.

The explanation offered by PJM for the transfer of CDTF responsibilities from the MMU back to the Market Services division is that the Market Services division is responsible for leading the development of PJM market rules, including

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<sup>22</sup> SMM 140.

those applicable to cost-based offers.<sup>23</sup> This explanation, that the MMU was erroneously leading the CDTF efforts for four years, is on its face implausible.

Further, PJM's justification for arbitrarily removing the MMU's CDTF-related responsibilities without consulting the PJM Board, its stakeholders or the Commission is entirely without merit. PJM claims that the 2003 PJM Board recommendation that working groups charged with setting rules to solve structural problems should be led by the Market Services division supports unilaterally removing the MMU as chair of the CDTF. The CDTF, however, is not charged with setting rules to solve structural problems, but rather makes recommendations for procedures to be used in setting the marginal cost inputs for PJM's calculations of cost-based rates. Further, PJM provides no justification for relying four years later on a 2003 Board recommendation to remove responsibility from the MMU explicitly granted by the Board in 2003. The Board transferred the chair of the CDTF to the MMU; thus the Board, not PJM management, should be the one to take it away.

**C. The Commission Erred In Granting Undue Deference to the Market Monitor's Opinion That PJM Had Not Violated Its Tariff.**

Finally, OPSI submits that the Commission also erred in granting undue deference to the opinion of Dr. Bowring regarding whether PJM violated its tariff. The Commission notes that "[n]either in his remarks at the technical conference, nor in his statement submitted in response to our data requests, has Dr. Bowring

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<sup>23</sup> PJM Supplemental Response to June 12 PJM Response to Commission Data Requests, July 2, 2007, at p. 19.

claimed that PJM violated its tariff.”<sup>24</sup> In at least one instance, the Commission went even further, accepting the uncorroborated assertions of PJM human resources personnel that MMU employees had not been targeted for coercion or intimidation. While OPSI respects the opinion of Dr. Bowring, it is the Commission, not the Market Monitor and certainly not the HR department at PJM, which must determine whether a tariff violation has occurred. As discussed above, the Commission must provide the parties an opportunity to conduct discovery in order to provide the factual record necessary to make such a determination.

In addition, while Dr. Bowring states that he is not ready to say that PJM was preventing the MMU from accomplishing its tariff-required functions, it is clear that Dr. Bowring believes his independence has been compromised, and that PJM senior management has interfered with his ability to do his job in the manner he believes to be most appropriate. PJM’s tariff provides the structure by which PJM provides market monitoring functions, but the MMU’s obligation to be independent of all market participants and its duty to provide independent market monitoring to prevent market power abuse exists wholly separately from the tariff, deriving from the Federal Power Act and prior Commission orders. Thus, the Commission has a responsibility to investigate all allegations that RTOs are interfering with their market monitors, and the most efficient means for conducting such investigations is to grant the parties access to the discovery

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<sup>24</sup> September 20 Order at ¶ 29.

procedures set forth in the Commission's Rules, allowing development of a complete factual record on which the Commission can determine the full extent of tariff or policy violations that have occurred.

**IV. CONCLUSION**

For the reasons explained above, the Commission should grant rehearing of the September 20 Order.

Respectfully Submitted,

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For the New Jersey Board of Public  
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Dated: October 19, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document in accordance with the requirements of the Commission's Rules of Practice and Procedure.

Dated at Richmond, Virginia this 19th day of October, 2007.

s/ William H. Chambliss

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