

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

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**PJM Interconnection, L.L.C.**

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**ER09-1063-000**

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**PROTEST AND COMMENTS OF THE  
ORGANIZATION OF PJM STATES**

The Organization of PJM States, Inc. (OPSI)<sup>1</sup> files this protest to communicate serious concerns with respect to proposed market monitoring tariff changes filed by PJM on April 29, 2009, in response to the Commission's October 17, 2008 Order in Docket Nos. RM07-17-000 and AD-07-7-000 ("Order 719").<sup>2</sup> In addition to being flatly contrary to the Commission's goal of market monitor independence and effectiveness, OPSI believes that PJM's proposed tariff changes violate the settlement agreement approved in Docket Nos. EL07-56-000, EL07-56-001, EL07-56-002, EL07-58-000, EL07-58-001,

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<sup>1</sup> Current members of OPSI are: Delaware Public Service Commission, District of Columbia Public Service Commission, Illinois Commerce Commission, Indiana Utility Regulatory Commission, Kentucky Public Service Commission, Maryland Public Service Commission, Michigan Public Service Commission, New Jersey Board of Public Utilities, North Carolina Utilities Commission, Public Utilities Commission of Ohio, Pennsylvania Public Utility Commission, Tennessee Regulatory Authority, Virginia State Corporation Commission, and Public Service Commission of West Virginia. The Illinois Commerce Commission had not voted on this document at the time of this filing.

<sup>2</sup> *Wholesale Competition in Regions with Organized Electric Markets* 125 FERC ¶ 61,071, 73 F.R. 64100 (October 28, 2008).["Order 719"]

and EL07-58-002, consolidated,<sup>3</sup> and that, therefore, the PJM Compliance Filing must be rejected.

### **Summary of Comments**

While PJM asserts that it is simply making a required tariff filing pursuant to a Commission directive, that assertion is a pretext, and its representation that the filing is the product of a stakeholder process is inaccurate at least with respect to the market monitoring language for which it seeks approval.

If PJM's proposed tariff revisions become effective, PJM will obtain broad new tariffed authority to exercise PJM management's review and control of market monitoring functions that it was unable to acquire in the settlement of the complaints filed against it by OPSI, the State Commissions and numerous wholesale and retail customers. For these wholesale and retail market stakeholders, the independence of the market monitor is critical to confidence in the fairness of PJM's wholesale markets. PJM has proposed to modify its market monitoring tariffs in a manner that strikes at the heart of the 2007 Market Monitoring Settlement despite objections from OPSI and stakeholders.

Moreover, the changes proposed would authorize PJM to create its own management-controlled market monitor that could interfere with the exercise of the independent market monitor's functions. This would resurrect the days of conflict

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<sup>3</sup> *Allegheny Electric Cooperative and Organization of PJM States v. PJM Interconnection, L.L.C.*, 122 FERC ¶ 61,257 (2007) ("Complaint").

between the Independent Market Monitor (“IMM”) and PJM management addressed by the 2007 Market Monitoring Settlement. The IMM’s detailed *Protest and Compliance Proposal*, filed at this docket on May 27, 2009, point to numerous language changes and additions in the PJM compliance tariffs that should be rejected or modified by the Commission.

The Commission should recognize that this filing, at least with respect to its market monitoring provisions, is not the product of a stakeholder process and is inconsistent with the 2007 Market Monitoring Settlement. Finally, despite clear language in *Order 719* directing that compliance tariffs clearly describe the respective functions of the RTO and Market Monitor, PJM has declined to provide such clarity, despite repeated requests by the IMM and numerous parties. The Commission should direct PJM to clearly state *all* of the respective duties and functions of itself and the IMM with respect to market monitoring, a requirement of Order 719 that PJM has failed to observe.<sup>4</sup>

## I. COMMENTS

### A. PJM’s Tariff Changes Violate the Letter and Spirit of the 2007 Market Monitoring Settlement

Section III of the 2007 Settlement Agreement bound the parties in EL07-56 and EL07-58 not to file any change to Attachment M without the agreement of all parties, or if PJM desired to make material changes without the agreement of other parties, such filing was to be judged by the “public interest” standard of review set forth in *United Gas*

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<sup>4</sup> IMM *Protest* at 60.

*Pipeline v. Mobile Gas Service Corp.*, 350 U.S. 332 (1956) and *FPC v. Sierra Pacific Power Co.*, 350 U.S. 348 (1956) [the well known *Mobile-Sierra* doctrine]. PJM has been fully aware of OPSI's opposition to its proposed changes to market monitoring tariffs contained in the instant filing; instead of complying with the above provision of Section III of the settlement, PJM has sought to characterize its filing as in "compliance" with Order 719. The fact remains that the tariff PJM has sought to modify is the settlement's Compliance Tariff, expressly attached to and made part of the Settlement.

PJM's cover letter to the 2007 Settlement Agreement filing expressly recognized that the settlement tariffs describing the respective functions of PJM and the IMM were critical and material element of the settlement. PJM stated:

The revised Market Monitoring Plan also addresses the MMU's functions and responsibilities. In general, the MMU shall objectively monitor the competitiveness of the PJM markets, investigate violations of market rules, recommend changes to market rules, prepare reports and take other actions specified in the plan.

*Allegheny Electric Cooperative, et al*, EL07-56, EL07-58 (December 19, 2007 Settlement Agreement, at 10)

The changes that PJM now seeks to impose to PJM's and the IMM's respective duties under Attachment M are material changes that are actively opposed by numerous parties to the 2007 Settlement. PJM's characterization of its proposed market monitoring changes as "tariff administration" does not make that so and does not relieve PJM of the provisions of the agreement it signed. As makeweight justification, it now seeks to characterize its proposed changes as "tariff administration" changes required to comply

with *Order 719*. It does so in order to seek to escape the “public interest” review standard required by the settlement it agreed to in 2007.

It should be remembered that obstructive and unilateral management efforts to control and review the Market Monitor’s core functions ignited the 2007 complaint proceedings that led to the December 19, 2007 PJM Market Monitoring Settlement approved by the Commission on March 21, 2007. Unfortunately, PJM now seeks to reintroduce management influence and decision-making regarding market monitoring under the pretext of “compliance tariffs”.

As the Commission is aware, two complaints were filed in April 2007 against PJM by OPSI, and by numerous state commissions and market participants in Dockets EL07-56 and EL07-58. Those complaints alleged that PJM management had violated provisions of its tariff with regard to the independence and functions of its market monitoring unit (MMU) and asked for appropriate relief. OPSI took this step because of the dangerous likelihood that core PJM market monitoring functions increasingly were being impaired by PJM’s actions. OPSI’s members believed then and believe now that effective and independent market monitoring is essential to continued public confidence in competitive wholesale electric generation markets.

An effective and independent market monitor is critical to market confidence because State commissions and market participants do not have access to the detailed information necessary for a complete picture of market competitiveness and competitive outcomes. The core functions of the market monitor are to review and report on the actions of market participants and the RTO as they pertain to the competitiveness of the

market; to provide information and data to the RTO and market participants regarding competitive market outcomes; to address inputs related to the determination and mitigation of market power; to review the effectiveness of the RTO's existing and proposed market design; and to gather and present information necessary to meet those goals. Effective market monitoring depends upon timely access to and analysis of detailed operational and bidding information that is often proprietary or confidential and which may not even be available to PJM itself. Moreover, OPSI's complaint articulated an additional role that should be obvious: stakeholder and public confidence in the integrity and competitiveness of RTO markets depends on a well-founded belief that the market monitor has real independence, necessary resources and complete information access necessary to carry out its job. The point was specifically addressed by OPSI in its Complaint, in which it states as follows:

It is essential to the confidence of stakeholders and State Commissions in the PJM wholesale markets that the organized wholesale electric markets that have been developed at such great effort and cost over the last 10 years not be impaired by lack of effective market monitoring.

*OPSI Complaint* at 4.

On March 28, 2008, the Commission entered an order<sup>5</sup> approving a settlement that partially resolved the complaints filed by OPSI, numerous named State commissions and other parties with regard to PJM's future relationship with the Market Monitor, and the administration of the PJM Market Monitoring Plan, Attachment M (Settlement).

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<sup>5</sup> *Allegheny Electric Coop, et al*, Order Approving Uncontested Settlement and Denying Rehearing, 122 FERC ¶ 61,257 (2008) ["Settlement Order"].

The uncontested Settlement had been negotiated over several months with the active participation of OPSI and OPSI member state regulatory Commissioners. The Settlement was intended to address OPSI and market participants' concerns regarding MMU independence and effectiveness, concerns that also were shared by the Commission. This objective was addressed in part by the Order as follows:

The comprehensive revisions to the Tariff, Operating Agreement, as well as new agreements for external market monitoring services that are filed as part of this Settlement Agreement, define the roles and authorities for market monitoring among the MMU, the PJM Board, and PJM management with greater specificity than currently defined in Attachment M of the Tariff. Identification and specification of relationships and roles defined by these revisions should help ensure that the analyses performed by the MMU remain independent and objective. Maintaining the objectivity of the PJM MMU and defining its relationship with PJM and stakeholders are key to ensuring a well functioning electricity market.

*Settlement Order* at P 2.

With regard to the respective roles of PJM and the Market Monitor, the Commission observed:

While the revised Market Monitoring Plan provides that the MMU may advise PJM of any disagreement with implementation of market rules or operation, the MMU will have no authority to direct PJM to modify its implementation of market rules or operation. However, the MMU may initiate and propose, through the stakeholder processes, changes to the design of PJM markets when market flaws are detected and may participate (consistent with the rules applicable to all PJM stakeholders) in stakeholder bodies. The MMU also may recommend that PJM take specific mitigation action that is authorized under the PJM rules, but shall not have authority to modify PJM operational decisions. The MMU may make reports on such recommendations to the Commission or other governmental agencies or the PJM membership and may, at its discretion, provide studies or reports on wholesale market issues upon written request of the OPSI Advisory Committee.

*Settlement Order* at P 13.

The Settlement Agreement itself provides that:

For a period of six years from the effective date of the attached revisions to Attachment M, if any party to the Commission proceedings in Docket Nos. EL07-56 or EL07-58, Dr. Bowring or the company established by Dr. Bowring petitions the Commission for a change to Attachment M or Section 18.17.4 of the PJM Operating Agreement (including Schedules 10 and 10A) such change shall, in the absence of agreement of all such entities, be governed by the [Mobile-Sierra] “public interest” standard ...Notwithstanding the foregoing, if the Commission issues a final rule in Docket No. RM07-19 (or in any other rulemaking proceeding affecting Market Monitoring) PJM shall not be precluded from submitting a compliance filing effecting such change, providing however, that any such filing shall be limited solely to changes required by the Commission, not discretionary changes made on behalf of PJM or any other entity.

*Settlement Agreement*, FERC Dockets EL07-56 and EL07-58 at 10 (filed December 19, 2007).

Although OPSI and the State Commissions did not obtain all of the relief originally requested, OPSI sought and continues to seek to address the issues in the forward looking manner desired by the Commission as outlined in the terms of the Settlement. OPSI is dismayed that PJM appears to be seeking to revise the Market Monitoring Plan and its relationship with the MMU in harmful ways that would again present some of the same issues regarding market monitoring roles, authorities and function that prompted the 2007 complaints.

**B. Order 719 Does Not Direct PJM to File Tariffs Undermining the IMM or Permit PJM to Exercise Control Over the IMM's Core Functions**

The Commission issued its *Order 719*<sup>6</sup> on October 17, 2007, and addressed four major areas regarding RTO markets, one of which is market monitoring. While the Commission declined to direct a uniform market monitoring structure across all RTOs, it reaffirmed its intention to uphold the PJM Market Monitoring Settlement it recently approved and stated as follows:

We decline to adopt as “best practices” the provisions of the recent settlement agreement entered into by PJM and a number of interested parties concerning the structure, function and independence of PJM’s MMU (PJM/MMU Settlement Agreement) [footnote omitted]. The provisions of that agreement were specific to one RTO, and represented a negotiated balancing of interests. It would be inappropriate to impose the specifics of that settlement on all other RTOs and ISOs, and especially to do so without notice and the opportunity to comment. However, we observe that the PJM/MMU Settlement Agreement is in accord with our determinations in this Final Rule regarding the appropriate MMU structure and tools.

*Order 719* at ¶ 330.

The Commission directed each RTO under its jurisdiction to initiate a consultative stakeholder process and file conforming tariffs within six months of publication in the *Federal Register*. While PJM convened an Order 719 Task Force in fulfillment of this Commission requirement, its handling of market monitoring issues in the Order 719 Task Force process, at least initially, has been something less than collaborative. PJM initially provided task force participants with its intended tariff changes to its Market Monitoring

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<sup>6</sup> *Wholesale Competition in Regions with Organized Electric Markets* 125 FERC ¶ 61,071, 73 F.R. 64100 (October 28, 2008). “Order 719”

Plan and asserted that the changes were “required” by *Order 719* and would be filed as proposed. In numerous subsequent meetings of the Order 719 Task Force, PJM simply continued to assert its initial position, despite objections from the MMU and numerous stakeholders that the proposed changes were modifications of the Market Monitoring Settlement and moved core market monitoring functions from the IMM to PJM without justification and in violation of the settlement. The last scheduled Task Force 719 meeting was on April 16, 2009. Approximately one week before the final meeting of the Task Force, PJM commenced private negotiations with the Market Monitor, seeking to close the gap between PJM’s stated position and that of the Market Monitor. However, at that final Task Force meeting, PJM indicated it had not resolved all differences and would continue to meet with the Market Monitor to further close their respective positions. PJM indicated at that final stakeholder meeting that it therefore had no final market monitoring tariff language for the stakeholder group to consider and comment upon. It is now clear that PJM did not resolve its differences with the Market Monitor – despite PJM’s modification of some of its initial draft tariff language, the core issues remain in dispute.

In furtherance of its proposed as-filed tariff changes, PJM has improperly seized upon a small scrap of ambiguous language in Paragraph 377 of *Order 719* as justification for making wholesale changes in the RTO/IMM structure, and organization and division

of duties.<sup>7</sup> PJM's major justification for all such changes is that each such function involves "tariff administration" that should be performed by PJM.

As an example of PJM's overreaching on market monitoring issues during the stakeholder process, at the February 5, 2009 Task Force 719 meeting of stakeholders, PJM proposed to file language in its compliance filing tariff that would have required the MMU to submit *all* draft reports without limitation for review by PJM prior to publication.<sup>8</sup> This proposal was eventually dropped by PJM when numerous stakeholders correctly pointed out that such power was denied PJM in the Market Monitoring Settlement and would be plainly contrary to the Independence provisions contained in the Market Monitoring Plan, *Attachment M* (III) (C) agreed to by PJM in 2007. Faced with plain language in the 2007 Market Monitoring Settlement that prohibited this proposal, PJM eventually relented and deleted the language from its filing. With this issue as the major exception, PJM largely avoided dealing directly with stakeholders on market monitoring issues during the Task Force 719 stakeholder process, preferring instead to present its proposed language and answer questions. (See Appendix for the actual PJM Attachment M language presented at the February 5, 2009 Task Force 719 meeting and later dropped.)

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<sup>7</sup> "We also direct that purely administrative matters, such as those identified by CAISO (enforcement of late fees and the untimely submission of outage reports and meter data), should be conducted by the RTO or ISO, rather than the MMU. Such activities are remote from the core duties that this Final Rule assigns to the market monitoring function." *Order 719*, ¶ 377.

<sup>8</sup> "All" in this context clearly meant all and every report that the IMM prepared, including internal reports. PJM's proposed language read: "The Market Monitoring Unit shall provide a preliminary draft of *any reports that it is permitted or required to prepare*". Proposed Revision to Attachment M, Section VI. D. (February 5, 2009 [emphasis supplied])

While it is obvious that OPSI disagrees strongly with PJM's position, we also are very troubled by PJM's posture in seeking to materially revise the Market Monitoring Settlement. We have sought to engage PJM in a meaningful dialog on these issues, both through the stakeholder process and through other means, without success and continue to be puzzled by PJM's intransigence – especially since there is no public interest reason that compels these changes, and both PJM and the PJM wholesale markets stand to lose public credibility and critical support if PJM's market monitoring proposals are implemented.

**C. The Commission Should Grant the Relief Requested in the IMM's *Protest and Compliance Proposal* and Direct that PJM Modify Its Compliance Filing Accordingly**

OPSI generally supports the modifications proposed by the PJM IMM in its May 27<sup>th</sup> *Protest*. We do so for the reasons stated above and also because we believe that market monitoring is not and should not be a “core function” of PJM. The kind of tariff-based administrative review and second-guessing of IMM decisions and findings that PJM seeks would require the creation of a second internal PJM “shadow market monitor”<sup>9</sup> requiring the retention, training and management of staff at least equal to the complexity of work currently performed by the IMM. It would be a waste and diversion of management resources and would subject PJM management to direct involvement in the setting and review of generation bids. Generation owners are members of PJM and

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<sup>9</sup> The IMM *Protest* discusses why there will be a need for PJM to create, train and supervise a “shadow staff” should it be successful in wresting control of the market monitoring tariff and interposing itself as a third party in IMM interactions with market participants. *IMM Protest* at 63.

extremely active in dialog with PJM and other stakeholders. PJM's proposal to operate in functions parallel to the duties of the IMM would subject PJM to constant generation interest lobbying and create chronic conflicts with its members that would present serious conflicts of interest between PJM and its members. In brief, PJM cannot act as a market monitor and avoid creating major conflict and conflict of interest between itself and its members. By contrast, the IMM owes no special duty to market participants except to carry out its functions faithfully and in accordance with the tariff.

## II. CONCLUSION

PJM's filing raises anew the concerns of OPSI with respect to IMM independence, IMM functions and the legitimacy of PJM's markets. These were the very concerns that the 2007 Settlement was negotiated to remedy. OPSI respectfully requests that the Commission consider these Comments and direct PJM to file tariff language consistent with that proposed in the IMM's May 27 filing.

Respectfully submitted,

/s/ Dallas Winslow

Dallas Winslow

Commissioner

/s/ Joseph C. Handlon

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For the West Virginia Public Service Commission

Dated: June 26, 2009

APPENDIX "A"

SELECTED EXCERPT FROM PROPOSED PJM  
ATTACHMENT M TARIFF PROPOSAL

PRESENTED TO PJM TASK FORCE 719  
February 5, 2009

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**B. Reports to Authorized Government Agencies:** The Market Monitoring Unit shall contemporaneously submit to the Authorized Government Agencies the reports provided to the PJM Board pursuant to Section VI.A. Subject to applicable law and regulation and any other applicable provisions of the PJM Operating Agreement or PJM Tariff, the Market Monitoring Unit shall, to the extent practicable, respond to reasonable requests by Authorized Government Agencies other than the Commission for reports, subject to protection of confidential, proprietary and commercially sensitive information, the protection of the confidentiality of ongoing inquiries and monitoring activities, and the availability of resources.

**C. Public Reports:** The Market Monitoring Unit shall prepare a detailed public annual report about the Market Monitoring Unit's activities, subject to protection of confidential, proprietary, and commercially sensitive information and the protection of the confidentiality of ongoing investigations and monitoring activities. The Market Monitoring Unit may, instead of filing a separate report, include the referenced material in a report filed pursuant to Section VI.A hereof.

**D. Draft Reports to PJM:** The Market Monitoring Unit shall provide a preliminary draft of any reports that it is permitted or required to prepare pursuant to this Attachment M, or as required by the Commission, any State Commission, court of law or other governmental entity having jurisdiction over the Market Monitoring Unit, to PJM for review and comment at least five (5) business days prior to the date on which the final version of the report is due to be submitted to the Commission or any State Commissions, or otherwise published. PJM has no authority to alter the reports generated by the Market Monitoring Unit or to dictate the conclusions contained in the reports. To the extent that the Market Monitoring Unit disagrees with any of the suggestions that PJM makes with respect to the draft reports after its review, the Market Monitoring Unit shall be free to disregard any such suggestions.

**VII. AUDIT**

The activities of the Market Monitoring Unit shall be audited by a nationally recognized independent third party auditor selected by the Market Monitor. The audit shall include, but not be limited to, a review of whether MMU expenditures were for purposes consistent with the functions set forth in this Plan. The audit report shall be provided to the PJM Board. Market

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served (as an email attachment) a copy of the foregoing document upon each party on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

Dated at Newark, Delaware, this 26th day of June, 2009.

/s/ Rajnish Barua

Rajnish Barua, Ph.D.

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