UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

KeySpan-Ravenswood, Inc.	)	
	)	
v.	)	**Docket No. EL01-50-002**
	)	
New York Independent System Operator, Inc	)	

REQUEST FOR LEAVE TO ANSWER AND ANSWER OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.

Pursuant to Rules 212 and 213 of the Commission's Rules of Practice and Procedure,[1] the New York Independent System Operator, Inc. ("NYISO") hereby respectfully requests leave to answer, and answers certain protests, of its September 20, 2002 compliance filing in this proceeding ("Compliance Filing").

In deference to Commission precedent, the NYISO has limited its answer to a few areas where it is essential to clarify the record or correct inaccurate statements. Specifically, the NYISO addresses: (i) false allegations that the NYISO exceeded its authority or otherwise acted improperly when it made the Compliance Filing; (ii) factual errors underlying certain challenges to the Compliance Filing's proposed effective date; (iii) mistaken claims regarding the Compliance Filing's proposed treatment of ancillary services charges; (iv) misleading assertions regarding the applicability of Part IV of the NYISO's Open-Access Transmission Tariff ("OATT"); and (v) erroneous claims regarding the Commission's station power precedent.

I. Notices and Communications

All notices and communications in this proceeding should be served on:

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[1] 18 C.F.R. §§ 385.212 and 385.213 (2002).

Robert E. Fernandez, General Counsel and Secretary
Mollie Lampi, Associate General Counsel
Belinda F. Thornton, Director of Regulatory Affairs
3890 Carman Road
Schenectady, NY 12303
Tel: (518) 356-6153
Fax: (518) 356-4702
rfernandez@nyiso.com
mlampi@nyiso.com
bthornton@nyiso.com

Arnold H. Quint
Ted J. Murphy
Hunton & Williams
1900 K Street, N.W.
Washington, D.C. 20006
Tel: (202) 955-1500
Fax: (202) 778-2201
aquint@hunton.com
tmurphy@hunton.com

II. Request for Leave to Submit Answer

The NYISO recognizes that the Commission generally discourages answers to protests. The Commission has, however, allowed such answers when they help to clarify complex issues, provide additional information that will assist the Commission, or are otherwise helpful in the development of the record in a proceeding.[2] The NYISO has carefully limited its answer to comply with these rules by addressing only those aspects of the protests that misunderstand or mischaracterize the Compliance Filing. The answer therefore clarifies the record so that the Commission's decision will be based on accurate information. It does not go further and comment on all of the issues where the NYISO may disagree with the protests.[3] The NYISO therefore respectfully asks that the Commission accept this answer.[4]

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[2] *See*, *e.g.*, *New York Independent System Operator, Inc.,* 99 FERC ¶ 61,246 (2001) (accepting answers to protests that helped to clarify issues and did not disrupt the proceeding); *Morgan Stanley Capital Group, Inc. v. New York Independent System Operator, Inc.*, 93 FERC ¶ 61,017, at 61,036 (accepting an answer that was "helpful in the development of the record . . . .") (2000); *New York Independent System Operator, Inc.*, 91 FERC ¶ 61,218 at 61,797 (allowing an answer deemed "useful in addressing the issues arising in these proceedings . . . .") (2000); *Central Hudson Gas & Electric Corp.*, 88 FERC ¶ 61,137 at 61,381 (1999) (accepting otherwise prohibited pleadings because they helped to clarify complex issues).

[3] The NYISO's silence on particular issues therefore should therefore not be interpreted as signaling its agreement with the protests.

[4] To the extent that the Commission views this answer as having been submitted out-of-time, the NYISO respectfully requests a waiver of the usual answer period.

III. Answer

A. The NYISO Acted Properly and Within Its Authority When It Made the Compliance Filing

1. The May 15 Order Required the NYISO to Submit a Compliance Filing that Reflected the Commission's Well-Established Station Power Policy

The Transmission Owners ("TOs") and Niagara Mohawk Power Corporation ("NIMO") allege that the Compliance Filing was not required by the Commission's May 15 Order[5] in this proceeding. They claim that the May 15 Order required only that the NYISO incorporate the terms of Technical Bulletin #34 into its Market Administration and Control Area Services Tariff ("Services Tariff"). This interpretation ignores the May 15 Order's conclusion that "fundamental questions about the appropriate treatment of station power were answered"[6] in the PJM Orders.[7]

Technical Bulletin #34 is not consistent with the Commission's "fundamental" policies. For example, Technical Bulletin #34 treated all generators as retail loads to be served under the applicable transmission owner's retail tariff, regardless of whether they self-supplied, and made no provision for station power netting. By contrast, the PJM Orders, and other recent decisions, treat self-supply, "remote" self-supply and third party delivery of station power differently. They also allow for netting. Moreover, the May 15 Order expressly directed the NYISO to "file a proposed revised tariff to include transmission of station power" and to "allow self-supplying

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5 *KeySpan-Ravenswood, Inc. v. New York Independent System Operator, Inc.*, 99 FERC ¶ 61,167 (2002) ("May 15 Order").

6 May 15 Order at 8.

7 *PJM Interconnection, LLC,* 94 FERC ¶ 61,251 (2001) ("PJM II"); *PJM Interconnection, LLC*, 95 FERC ¶ 61,333 (2001) ("PJM III"); *PJM Interconnection, LLC*, 95 FERC ¶ 61,470 (2001) ("PJM IV") (together, the "PJM Orders.")

merchant generators to net station power against gross output over some reasonable time period . . . ."[8]

Therefore the NYISO would have been acting in bad faith if it had responded to the directive to "make a compliance filing within 90 days revising its Services Tariff to conform to the requirements of this order" by incorporating Technical Bulletin #34 into its tariff. That approach would have ignored the Commission's station power policies and the May 15 Order's unambiguous instructions. The only plausible reading of the May 15 Order is that it required the NYISO to revise its tariff to reflect the fundamental principles of the PJM Orders, such as allowing netting, and to treat different kinds of station power transactions differently. In order to satisfy this requirement it was also necessary for the NYISO to establish station power-related procedures, *e.g.,* rules governing ancillary services charges, since the core provisions of the PJM Orders could not be implemented in a vacuum. The NYISO's comprehensive treatment of station power in the Compliance Filing was therefore in compliance with the May 15 Order.

2. The May 15 Order Authorized the NYISO to Adopt Features of PJM's Station Power Rules that It Deemed Appropriate for New York

The TOs and NIMO argue that the NYISO lacked authority to adopt station power rules that are used in PJM because the May 15 Order stated that "the NYISO's proposal need not track aspects of PJM's proposal which would be inappropriate for New York." This misrepresents the May 15 Order which suggested that the NYISO was not required to adopt certain rules, but did not imply that the NYISO was therefore forbidden to adopt them. The reality is that the May 15 Order required the NYISO to adopt the core station power principles established by the PJM Orders. It also gave the NYISO permission to depart from secondary aspects of PJM's program,

[8] May 15 Order at 8.

such as the length of the netting period or ancillary services rules, if they were "inappropriate" in light of New York-specific considerations. It did not empower the NYISO to disregard the PJM model, ignore "appropriate" PJM rules, or continue the Technical Bulletin #34 approach.

The NYISO considered all of the issues carefully and consulted at length with its stakeholders before submitting the Compliance Filing. It concluded that few aspects of the PJM station power model would be "inappropriate" for New York and that there was thus little need to deviate from the PJM model.[9] This was especially true in light of other Commission precedent that stresses the importance of uniform station power rules.[10] Consequently, the NYISO acted in compliance with the May 15 Order by proposing to adopt PJM's station power rules to the extent they were "appropriate" for New York.

3. The NYISO Acted Well Within Its Authority Under the ISO/TO Agreement and the Federal Power Act When It Made the Compliance Filing

a. The NYISO Was Authorized To Make the Compliance Filing Under Section 206 of the Federal Power Act

The TOs and NIMO claim that the NYISO acted improperly when it submitted the Compliance Filing because it did not satisfy the evidentiary requirements of Section 206 of the Federal Power Act ("FPA"). This ignores the fact that the May 15 Order was issued in response to a Section 206 complaint by KeySpan-Ravenswood LLC ("KeySpan"). The NYISO opposed the complaint but, despite the TOs' attempt to cast the May 15 Order as a defeat for KeySpan,

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[9] It is true that the NYISO originally argued that New York would need station power rules that were significantly different from PJM's. However, this does not invalidate the NYISO's ultimate conclusion that few differences were actually necessary.

[10] *See, e.g., Rumford Power Associates, L.P., et al.*, 97 FERC ¶ 61,173 at 61,805 (2001) (stating that the three Northeastern ISOs, and their market participants, "should work together to adopt uniform station power market rules, which would, of course, include appropriate uniform netting intervals").

the Commission ruled in KeySpan's favor. It is therefore misleading for the TOs to allege that the NYISO failed to make required showings under Section 206 because the Commission has already found that KeySpan made those showings. Once the Commission reached this conclusion it had the authority to direct the NYISO to submit the Compliance Filing without making any new showings.

b. The NYISO Was Authorized to Make the Compliance Filing Without the Management Committee's Approval

The TOs contend that the Compliance Filing violated Section 3.03 of the ISO/TO Agreement because the NYISO submitted it without first obtaining Management Committee approval. The obvious flaw in the TOs' theory is that it would give the TOs, and other stakeholders, the right to prevent the NYISO from complying with clear Commission directives. This would undermine the Commission's ability to fulfill its responsibilities under the FPA and be inconsistent with Commission policy.

Moreover, Section 3.03 of the ISO/TO Agreement cannot plausibly be read as restricting the NYISO's right to make compliance filings because it applies to Section 205 filings, which are not the same as compliance filings. The Commission has explained that "[a] compliance filing is not a change initiated by a utility but rather is a change expressly directed by the Commission -- whether summarily or after a trial-type evidentiary hearing -- which the utility is merely implementing or carrying out."[11] A compliance filing "is not an opportunity to make changes not directed or otherwise authorized" by the Commission "especially if the effect is to undo a Commission directive."[12] By contrast, a Section 205 filing is a new proposal to modify a

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11 *Southern Company Services, Inc.,* 61 FERC ¶ 61,339 at 61,328-29 (1992).

12 *Southern Company Services, Inc.,* 63 FERC ¶ 61,217 at 61,596 (1993).

tariff that is voluntarily submitted by a public utility. Moreover, the Commission's authority to require compliance filings derives from a different provision of the FPA than its authority to approve voluntary Section 205 filings.[13] Compliance filings are further distinguished from Section 205 filings by the fact that they do not automatically become effective after 60 days in the absence of a Commission order.[14]

Accordingly, the Commission should read Section 3.03 of the ISO/TO Agreement as establishing that the NYISO may voluntarily file tariff amendments under Section 205 only when it has the Management Committee approval (except in "exigent circumstances".) It does not mention compliance filings and should not be construed as barring the NYISO from revising its tariffs through Commission-mandated compliance filings without the TOs', and other stakeholders', permission.

If the Commission believes that there is any remaining ambiguity in Section 3.03 it should consider that the established course of dealing under the ISO/TO Agreement has been for the NYISO to make compliance filings without Management Committee approval.[15] The NYISO has followed this procedure dozens of times and the Commission has always accepted it. The NYISO has not abused its authority or ignored stakeholder views when making compliance filings. It has consistently sought stakeholder input in cases, including this one, where it was directed to make compliance filings with substantive implications. There is no need to give the TOs, or other stakeholders', authority to approve compliance filings.

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13 *See, e.g.,* 61 FERC at 62,330 (explaining that the Commission may require public utilities to submit compliance filings pursuant to its authority to "fix a rate by order.")

14 *See, e.g.,* 61 FERC at 62,329-30.

4. The NYISO Did Not Violate the ISO/TO Agreement by "Seeking" to Modify its Tariffs to Require Retail Wheeling

The TOs and NIMO claim that the NYISO's submission of the Compliance Filing violated Section 3.04(h) of the ISO/TO Agreement which bars the NYISO from "seeking" a tariff modification that would directly or indirectly require retail wheeling. This is misleading and incorrect. First, the Commission has already held that station power netting does not result in retail wheeling.[16] Second, even if the Compliance Filing involved retail wheeling there would not be a Section 3.04(h) violation because the NYISO did not "seek" to make it. The NYISO only made the Compliance Filing after the May 15 Order expressly directed it to do so in response to a complaint that the NYISO opposed. Section 3.04(h) prevents the NYISO from voluntarily submitting a Section 205 or 206 filing to introduce retail wheeling. It should not be read as requiring the NYISO to ignore the May 15 Order or to fail to faithfully comply with it.

5. The TOs Have Mischaracterized the Compliance Filing's Monthly Netting Proposal

Finally, the Commission should be aware that the TOs' have distorted Commission precedent when they criticize the NYISO's monthly netting proposal.[17] Contrary to the TOs' claims, the Compliance Filing's approach, which uses netting to determine whether, and how much, transmission service a generator must procure does not apply netting to purchases or sales of energy, is the same as the one that the Commission approved for PJM.[18] The Commission

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15 The Commission's policy has been to interpret ambiguous contracts in a manner consistent with the parties' course of dealing. *See Public Service Co. of New Hampshire v. New Hampshire Elec. Coop., et al.*, 84 FERC ¶ 61,129 at 61,672 (1998).

16 *See* PJM III at 62,184-85.

17 *Motion to Intervene and Protest of the New York Transmission Owners*, Docket No. EL01-50-002 at 19-20 (October 11, 2002).

18 *See* PJM IV at 62,683 - 85.

should not be misled into believing that the Compliance Filing's approach to netting is in any way inconsistent with the model approved in the PJM Orders.

B. The Commission Should Not Change the NYISO's Proposed Effective Date

1. The NYISO Has Already Justified Its Proposed Effective Date

The PSEG Companies ("PSEG") and KeySpan ask that the Commission reject the NYISO's proposal to make the Compliance Filing effective 120 days after the issuance of a final order. Among other things, they claim that the NYISO has not demonstrated why it will take more than 60 days to implement the Compliance Filing. This is untrue. The Compliance Filing noted the NYISO's conclusion, based on its own expertise and the views of its software consultants, that the station power software cannot be safely completed, tested and implemented in less than 120 days.[19] The NYISO clearly has the best understanding of the technical issues involved. Just as importantly, it has no economic stake in the station power controversy and thus has no incentive to offer an unrealistic, or dishonest, assessment. The Commission should trust the NYISO's technical determinations, unless there is some legitimate reasons to doubt them.

PSEG and KeySpan have not offered any reason to question the NYISO's proposed effective date. They simply declare that the NYISO must do more to justify the proposal. It is unclear what sort of evidence they expect the NYISO to offer, but they appear to believe that extensions of the 60 day period should rarely be granted. The Commission should not accept

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[19] To clarify the record, the primary impediment of a faster implementation is the complexity of the coding needed to institute station power netting. This will be an entirely new feature in the NYISO markets, and it will have implications for many other components of its software. It will therefore take considerable time to develop. The NYISO did not fully appreciate the difficulty of implementing netting when it indicated that it could implement station power relatively quickly. *See Motion of KeySpan-Ravenswood LLC to Intervene and Comment,* Docket No. EL01-50-002 (October 11, 2002) ("Keyspan") at 8 **(**alleging that the NYISO originally "committed" to resolve station power issues expeditiously.)

this premise. The 60 day period was established with traditional cost-of-service rate-making, not markets, or software, in mind. While the NYISO has a responsibility to implement software changes as soon as reasonably possible the FPA does entitle market participants to demand that changes be finalized in 60 days, regardless of how much time is actually needed to complete them. The Commission has recognized that software revisions associated with market enhancements, and the related testing, can take months.[20] There is thus no basis for requiring the NYISO to support its proposed effective date with detailed affidavits or technical papers. The Commission should instead accept the Compliance Filing's statement supporting its proposed effective date.

2. It Is Impossible to Expedite the Implementation of New Station Power Rules by Making Manual Calculations or Retroactive Billing Adjustments

KeySpan erroneously suggests that the NYISO could accelerate the introduction of the new station power rules by adopting an earlier effective date and: (i) performing manual calculations while awaiting the development of its software; or (ii) making retroactive billing adjustments after the software is finished so that the market ultimately settles as if the station power rules had been in place earlier. Unfortunately, it will neither be possible for the NYISO to "manually" calculate the effects of station power netting nor to retroactively re-bill market participants as if the Compliance Filing rules were in place at an earlier effective date.

Until the coding changes needed to implement the Compliance Filing are made, station power transactions in the NYISO-administered day-ahead and real-time markets will settle as

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[20] *See, e.g., New England Power Pool, et al.*, 100 FERC ¶ 61,287 (2002) (affording ISO-NE substantial additional time needed to implement reserves markets); *PJM Interconnection, L.L.C.,* 101 FERC ¶ 61,115 (2002) (allowing PJM to implement more limited reserves markets before transitioning to a fully SMD-compliant model.)

they do today, *i.e.,* station power load will be treated like any other load buying energy at retail. Each customer's bill will include a daily charge for ancillary services based on its load-ratio share of that day's ancillary service costs.

If the NYISO were required to apply the Compliance Filing to a period before the station power software modifications were in place, many transactions that were originally treated as purchases of retail energy would have to be retroactively rebilled as self-supply or remote self-supply station power transactions. The NYISO does not believe that such a retroactive re-classification would be feasible. In theory, it might be done through: (i) a manual review of each generator's retail and output meter readings for the entire retroactive period; (ii) a manual determination of whether each generator obtained station power through self supply, remote self supply or third party supply; (iii) re-designating each generator's daily usage for months when that generator was net positive as self-supplied station power; (iv) recalculating ancillary services charges for each day of the relevant period to reflect the absence of loads re-designated as station power;[21] and (v) rebilling the ancillary services charges applicable to each NYISO customer for each day during the relevant period. In practice, this would be an enormous, and perhaps impossible undertaking. Even attempting to make the necessary calculations would overwhelm the NYISO's billing staff and prevent it from conducting other essential tasks.

Thus, contrary to KeySpan's claims,[22] station power netting is not "a simpler and more feasible practice" than implementing real-time in-city market power mitigation measures.

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[21] The need to perform this recalculation is an inherent function of the Compliance Filing's adoption of netting, not the NYISO's proposal to prospectively waive ancillary services charges for certain station power transactions.

[22] *See* KeySpan at 22.

Netting is actually a much larger and more difficult problem that could not be accommodated simply by hiring a small number of additional personnel.

3. It Is Appropriate for the NYISO to Defer the Start of Station Power Implementation Until After the Issuance of a Final Order

KeySpan has distorted the NYISO's reasons for requesting permission to defer the implementation of it station power software until after the issuance of a final Commission order. KeySpan wrongly states that the NYISO is seeking an "indefinite stay" of the May 15 Order because it raises controversial issues, or because it does not consider station power issues to be important.[23] The reality is that the NYISO has sought the deferral because the necessary software changes are so extensive and complex that a great deal of work could be wasted if the Commission requires even relatively minor changes to the proposal. The fact that this case is so controversial makes it more likely that the Commission will require at least minor changes.

It is true, as KeySpan notes,[24] that many, but not all, "NYISO tariff filings, including some that were controversial and required extensive computer programming . . . ." proposed effective dates no more than 60 days after the filing date. However, KeySpan ignores the fact that the NYISO has often had to request additional time to implement proposals that proved impossible to implement in 60 days, especially when the Commission required significant changes in mid-stream. Such changes can result in the NYISO having to discard months of work and start from scratch in key areas. The NYISO requested an effective date 120 days after the issuance of a final Commission order precisely because it wanted to avoid this outcome.

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23 *See* KeySpan at 8.

24 *See* KeySpan at 5.

In addition, KeySpan incorrectly alleges that the NYISO's request for a deferral is driven by a subjective view that station power issues are unimportant. This disregards the many other high-priority software-related tasks that the NYISO has been directed to undertake, many of which are underway in various initiatives to eliminate seams in the Northeast. Given the limits on the NYISO's resources, it should be allowed to defer work on the station power project until a final order firmly establishes the project's specifications. This will permit it to focus on other projects, that have already been approved, in the interim.

Finally, the NYISO clarifies that its proposed effective date is tied to the issuance of a "final order" on rehearing by the Commission. Some parties appear to have erroneously assumed that the proposed effective date was tied to the issuance of a judicial decision on any appeals of the final order.

C. Ancillary Services

The New York State Public Service Commission ("NYPSC") incorrectly argues that the Compliance Filing arbitrarily proposes to waive ancillary services charges for remote self-supply of station power. It also argues that all station power transactions that involve a transmission component should be subject to ancillary services charges.

The NYPSC has ignored the fact that the PJM Orders allowed PJM to waive ancillary services charges for the same reason that the Compliance Filing proposed to waive them, *i.e.,* that the costs of imposing the charges outweigh the benefits.[25] Moreover, it wrongly assumes that tracking generators' self-supply and third party supply of station power is all that the NYISO needs to do to calculate ancillary services charges associated with station power.

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[25] *See* PJM IV at 62,686 - 87.

Because ancillary services are associated with transmission service, ancillary services charges cannot be determined based solely on real-time energy consumption under a station power netting regime. The additional billing steps that would be required to calculate them would be time consuming and difficult. The NYISO continues to believe that ancillary services charges are likely to be so insignificant that the large effort necessary to compute them would not be warranted.

In the event that the Commission decides that the NYISO may not distinguish between remote self-supply and third party supply, and must either waive ancillary services charges for all types of station power service or for none, it should permit the waiver of all ancillary services charges. The administrative burden of calculating ancillary services for all types of transactions would exceed the benefits of doing so.

D. The Compliance Filing Correctly Distinguishes Between Part II and Part IV of the NYISO's Open-Access Transmission Tariff

The TOs, NIMO and the NYPSC erroneously claim that any transmission service that the NYISO provides in connection with station power deliveries must necessarily be provided under Part IV of the NYISO's OATT because of its retail character. The NYISO has not adopted this interpretation because the OATT clearly states that Part IV only applies to "Eligible Customers taking retail access service under retail access tariffs . . . ." It was therefore appropriate for the NYISO to limit the availability of Part IV service to third party deliveries of station power that involve a transmission component.

E. The Compliance Filing Correctly Reflects the Commission Precedent on the Jurisdictional Status of Station Power Transactions

Various protestors have argued that the Compliance Filing should more clearly define the line of demarcation between federal and state jurisdiction, and federal and state delivery charges.

The NYISO believes that its proposal tracks the nuances of the Commission's precedent, including Order No. 888, more faithfully than protestors who suggest that station power transactions must invariably be federal or state jurisdictional. The Compliance filing's premise is that self-supply (to the extent it includes any delivery component) and remote self-supply will often involve Commission-jurisdictional transmission service, and that third party supply will often involve state jurisdictional distribution service. It also recognizes, however, that there will be exceptions to these norms depending on the type of facilities that serve individual generators so that self-supply may involve a state-jurisdictional component and third-part supply may involve a Commission-jurisdictional component.

The NYISO would not object to making further clarifying tariff revisions, particularly if the Commission chooses to use this proceeding to clarify its previous jurisdictional statements. At the same time, the NYISO should not be required to include detailed information about non-jurisdictional services in its tariff.[26]

[26] *See, e.g., PECO Energy Co.,* 85 FERC ¶ 61,271 (1998).

IV. Conclusion

WHEREFORE, for the foregoing reasons, the NYISO, respectfully requests that the Commission accept this answer and reject those aspects of the protests that are addressed herein.

Respectfully submitted,

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Ted J. Murphy
Counsel for
New York Independent System Operator, Inc.

Arnold H. Quint, Esq.
Ted J. Murphy, Esq.
Hunton & Williams
1900 K Street, NW
Washington, DC 20006-1109

November 7, 2002

cc: Daniel L. Larcamp, Director Office of Markets, Tariffs and Rates, Room 8A-01, Tel. (202) 502-6700
Alice M. Fernandez, Director Office of Markets, Tariffs and Rates -- East Division, Room 71-31, Tel. (202) 502-8284
Robert E. Pease, Acting Director of Division of Enforcement, Office of Market Oversight and Enforcement, Room 92-33, Tel. (202) 502-8131
Michael A. Bardee, Lead Counsel for Markets, Tariffs and Rates, Room 101-09, Tel. (202) 502-8068
Stanley P. Wolf, Office of the General Counsel, Room 101-03, Tel. (202) 502-8891

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in the above-captioned proceeding in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure 18 C.F.R. § 385.2010 (2002).

Dated at Washington, D.C. this 7th day of November, 2002.

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Ted J. Murphy
Hunton & Williams
1900 K Street, NW
Washington, DC 20006-1109