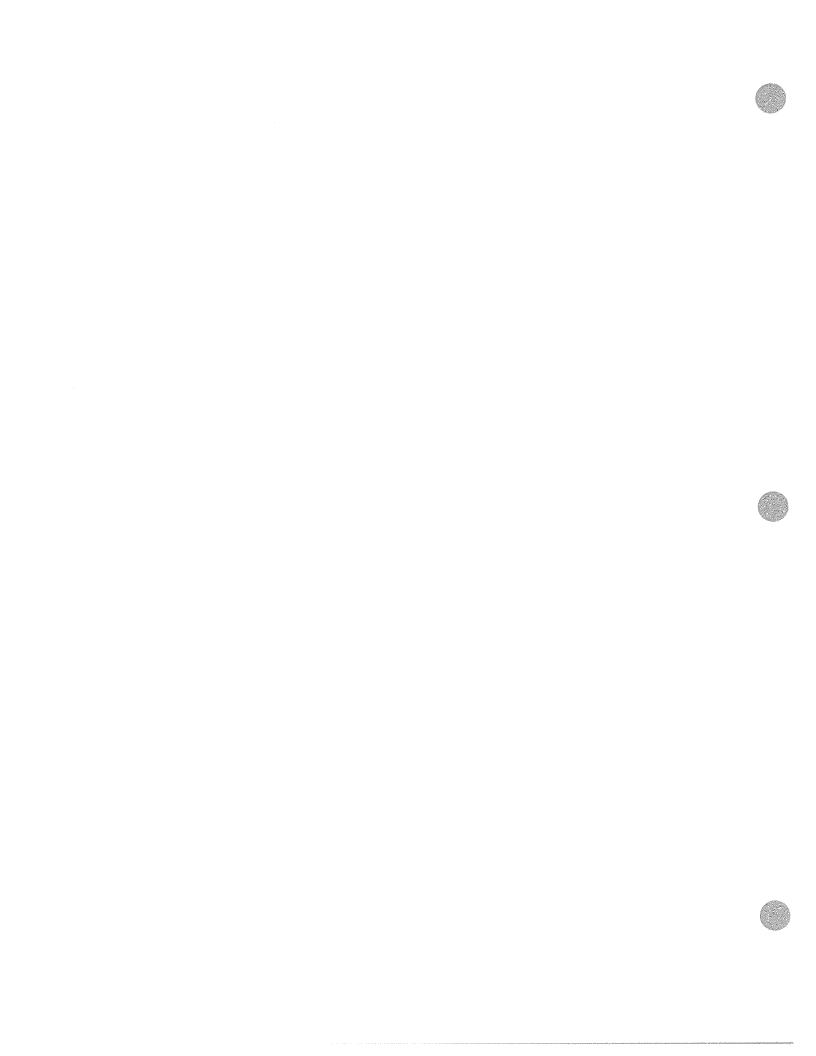
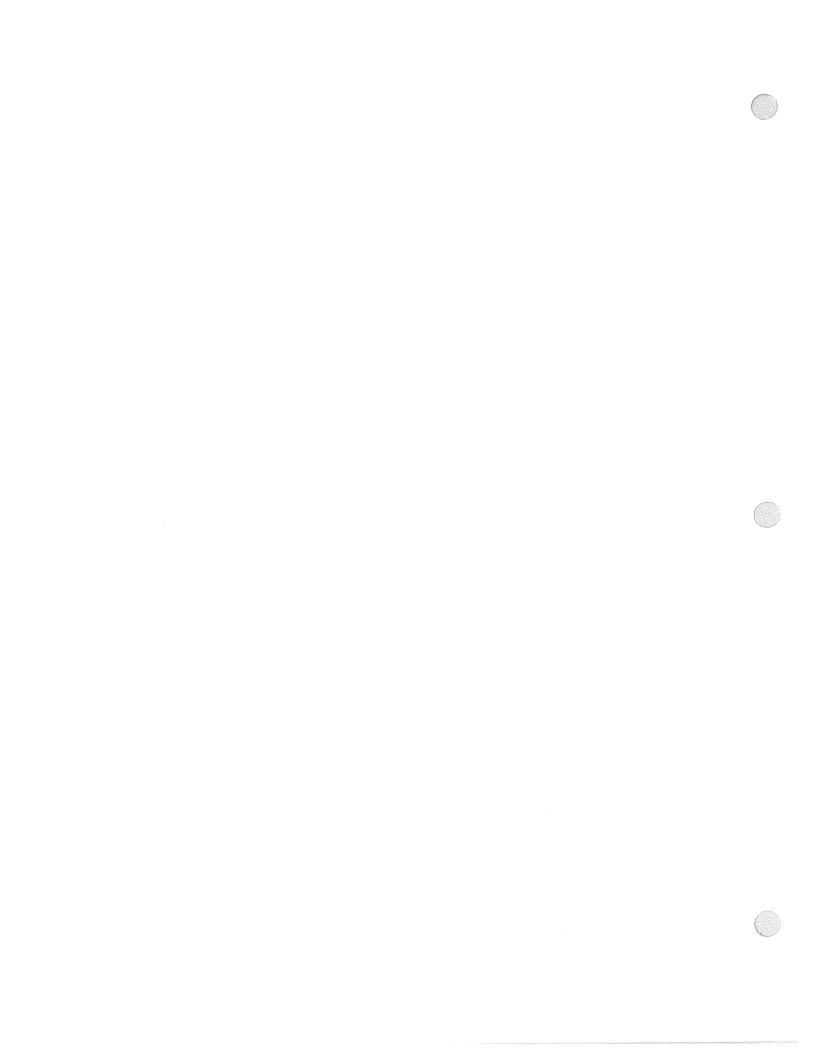
### Reading Municipal Light Department (RMLD) Board of Commissioners General Manager Committee Agenda

# Monday, November 7, 2011 7:00 p.m. General Manager's Conference Room

- 1. Account Payable Warrant regarding employee travel to Phoenix Attachment
- 2. NSTAR Radial Line Payment Report Attachment
- 3. Motion to Adjourn



# Account Payable Warrant – Employee Travel



#### Jeanne Foti

From:

MaryEllen O'Neill [maryellenoneill@hotmail.com]

Sent:

Thursday, October 06, 2011 12:58 PM

To:

Vincent Cameron; Richard Hahn; Phil Pacino; Gina Snyder; Bob Soli

Cc:

Bob Fournier; Kevin Sullivan; Steve Kazanjian; Jeanne Foti

Subject: RE: Answer to Questions on Payables for 10/3/11

A couple of questions/points.

\*I thought Mr. Soli had a least one question on these set of payables?

\*Copies of the agendas at the Phoenix conference were provided with the travel reimbursement forms for Mr. D'Alleva and Mr. Sullivan. This has been the standard when employees are reimbursed for attendance at out-of-town meetings/conferences. No written documentation of the reason for the expenses incurred on September 16 was provided. It is reasonable to expect that such material is provided and it should be provided for all travel reimbursement requests.

> From: vcameron@RMLD.com

- > To: rhahn@lacapra.com; philpacino@grmp.net; bogina03@earthlink.net; maryellenoneill@hotmail.com;
- > CC: bfournier@RMLD.com; ksullivan@RMLD.com; skazanjian@RMLD.com; jfoti@RMLD.com
- > Subject: Answer to Questions on Payables for 10/3/11
- > Date: Thu, 6 Oct 2011 13:40:22 +0000

>

>

> Snyder

> 1. Kazmierczak - Bill does not match refund 131.94.

- > On the second sheet the Account Balance is shown as \$47.50 The bill attached shows \$131.94, which was paid in addition to the previous billing of \$47.50. The customer paid \$47.50 for their previous bill and the bill for \$131.94 was sent while the \$47.50 was being sent in by the customer. Therefore, the \$47.50 was paid twice.
- > 2. Machnik Bill does not match refund 131.94.

> The Machnik refund was essentially the same situation as Kazmierczak's described above. On the second sheet the Account Balance is shown as \$79.77. The bill attached shows \$123.59, which was paid in addition to the previous billing of \$79.77. The customer paid \$79.77 for their previous bill and the bill for \$123.59 was sent while the \$79.77 was being sent in by the customer. Therefore, the \$79.77 was paid twice.

- > 3. McSweeney This overpayment is similar to question last month described as overpayment rather than a final bill. It's costly to process these, why not take it
- > off the next month's bill?

> This payment is the same as described above. There was no "next payment" because the customer finaled out.

> 4. Caliper - What is the cluster graph report?

> The cluster graph report shows points on a graph showing different capabilities of prospective employees who take the Caliper Test.

> 5. Rotary - Would like to see ad @ our next meeting. > The add was attached to the invoice. It is also attached to this e-mail. >

> O'Neill

> 1. D'Alleva/Sullivan - Why travel on Sept. 15th when conference did not begin until the 17th? Documentation provided for hotel charges, but not payment

> thereof. Why a car rental on the 16th (Sullivan)?

> The RMLD is upgrading its meters and will have a fixed network meter reading scheme within the next year. It is in the RMLD's Capital Budget. Kevin and Nick attended an Itron users conference to gain more information about Itron meters and fixed networks. Kevin has been in communications with personnel from Tucson Electric Power regarding their Fixed Network Metering System they have installed and been testing. The people at TEP have been invaluable as a resource for the RMLD. This summer I was invited to view the system in operation (cutover was done in July). With the Itron User's Conference in Phoenix, it became advantageous to visit Tucson Electric and see their system in action.

>

> Kevin and Nick's itinerary is below. In both Kevin's and Nick's expense report there is information as to the pre conference seminars they attended on Saturday and Sunday. The Itron regular conference started on Monday.

> Itinerary for Nick and I:

- > Thursday afternoon fly to Phoenix.
- > Friday morning @ 07:00 rent a vehicle for travel to Tucson Electric Power (TEP).
- > Arrive in Tucson @ 08:45 (TEP Engineering/IT personnel cleared their day for discussion and system explanation)
- > Arrive back to Phoenix @ 18:30, register for Itron pre-conference training classes Saturday and Sunday. Drop off vehicle.
- > Saturday and Sunday 09:00 16:00 attend Fixed network 100 class
- > Monday 08:00 attend Itron User's conference opening ceremony
- > Monday and Tuesday agenda: attend 5 knowledge break-out sessions each day 09:30 16:30 (150 available)
- > Monday Sessions: 1. OEM communication products and offerings
- > 2. A smart grid go to market strategy case study
- > 3. Optimization of fixed network daily operations and MDM integration
- > 4. Finding lost or stolen meters with AMR
- > 5. IEE MDM C&I roundtable
- > Tuesday Sessions: 1. Leveraging your MDM solution to minimize IT impact
- > 2. The ins and outs of radio frequency technologies
- > 3. Bonneville Power's MDM implementation: project methodology and lessons learned
- > 4. Idaho Power MDM implementation and operation (double session)
- > Wednesday fly back home

>

> 2. Gray's Towing - Two vehicle accidents. What are the causes? Whose responsibility?

> West Willow and Summer in Reading. A vehicle hit one of our vehicle and damaged it. We have contacted the vehicles owners insurance company for payment.

> Lowell St and Route 38, Wilmington. Our vehicle was parked and it was sideswiped by another vehicle. We have contacted the other person's insurance company for payment.

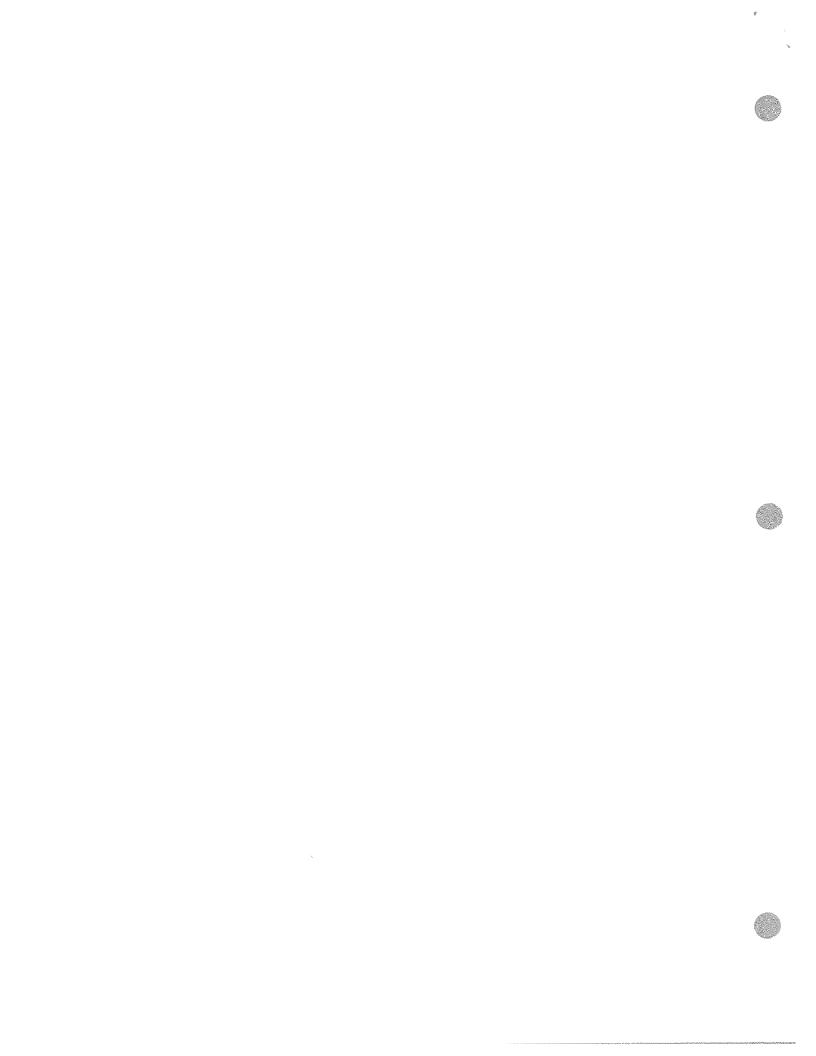
> 3. Wilmington Police Department - Another person doing detail on Sept. 20 billed at eight hours rather than the actual four that were on blue slip.

> I put a notation on the invoice that there was incorrect billing on the bill from the Town of Wilmington. I also made a notation at the top of the page to return the check to the RMLD and we can either redeposit it or credit

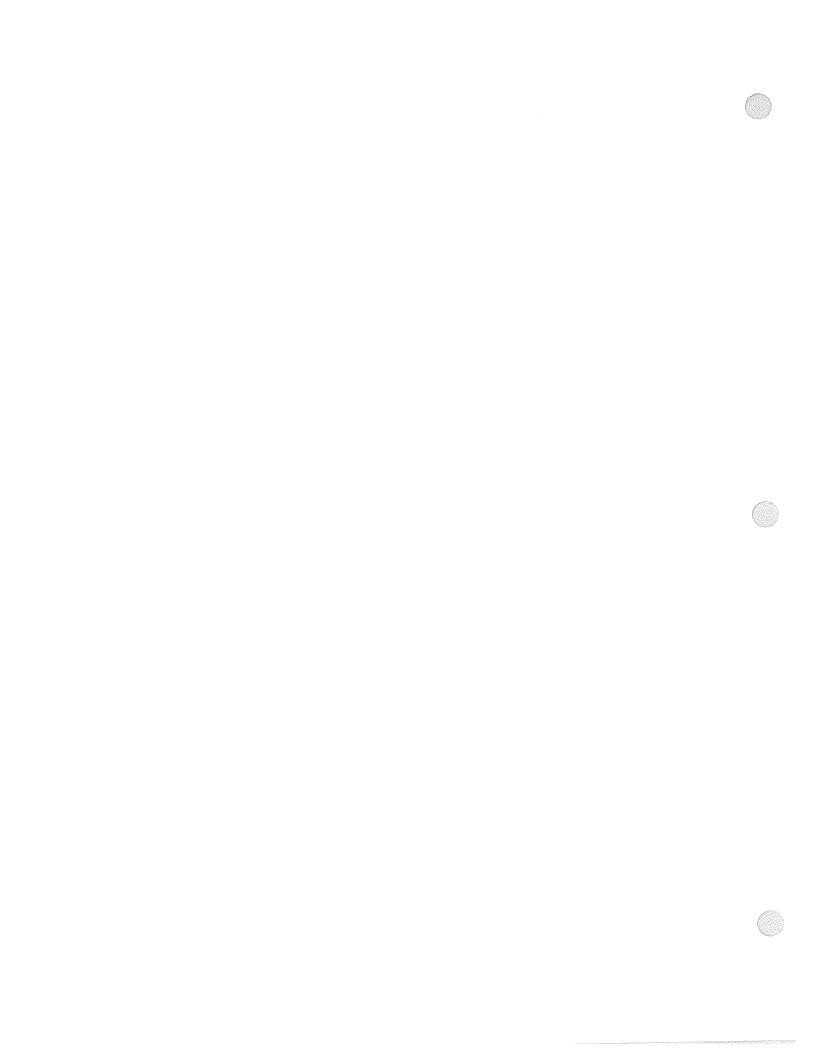
10/21/2011

the next payment to the Town of Wilmington Police. >





# NSTAR Radial Line Payment Report



### READING MUNICIPAL LIGHT DEPARTMENT

To: RMLD Board of Commissioners

October 12, 2011

From: Vinnie Cameron

Subj: NSTAR Radial Line Payment Report

In May 2011, the RMLD took action after it had discovered that it was being billed under a 1979 transmission service rate schedule with NSTAR that should have been discontinued in 2003. The discovery was made when Kevin Sullivan, RMLD Engineering and Operations Manager, was reviewing the payables warrant and found the RMLD was paying for Radial Line Support for the transmission lines coming into the Gaw Substation. Kevin contacted me and said that he thought the billing was incorrect. These bills come through the Energy Services Division as a power supply expense. I discussed Mr. Sullivan's observations with Jane Parenteau and Bill Seldon. We investigated what Kevin found and determined that the 211-503/504 lines connecting the RMLD to NSTAR were considered Pool Transmission Facilities (PTF). I needed guidance on this issue so I contacted John Coyle, an attorney with Duncan & Allen, who tends to the RMLD's transmission issues and Frank Radigan, of Hudson River Energy, a consultant that the RMLD has used on past transmission issues.

Mr. Coyle stated that the NSTAR transmission lines serving the Gaw Substation had been reclassified by ISO-NE as a "loop feed" configuration instead of "radial". In order to do this, NSTAR had to bring this issue to ISO-NE and have it accepted by the ISO-NE Reliability Committee. Once ISO-NE accepted the reconfiguration of the lines, they would then be deemed PTF by ISO-NE. Any operation and maintenance costs on these lines could be socialized over the New England Power Pool, according to the Regional Network Service (RNS) rates for ISO-NE.

I asked Mr. Coyle to contact NSTAR and request that Radial Support Charges be discontinued and the RMLD be provided an appropriate refund. Attachment 1 is a letter from Mr. Coyle recommending the termination of Federal Energy Regulatory Commission (FERC) accepted Rate Schedule 125, which are the Radial Line Support charges. Since Rate 125 is a FERC Transmission Rate, they need to accept the cancellation of the rate. Attachment 2 is the FERC letter officially accepting that Rate 125 is being cancelled at the agreement of both parties. (There is a notation at the top of the letter referring to Tampa Electric Company, which is an error by the FERC.)

At my request, Mr. Coyle researched when the 211-503/504 lines were reclassified as PTF, and it appears that NSTAR had the radial lines reclassified by ISO-NE as a loop feed sometime between July, 2002 and June, 2003. The RMLD was not informed by either NSTAR or ISO-NE that the 211-503/504 lines had been reclassified as PTF. The

RMLD did not have employees or consultants covering the Transmission or Reliability Committee meetings.

I have looked at information on the ISO-NE website in the 2002 – 2003 timeframe, which is when the radial lines would have been reclassified as PTF. Attached are two PTF Catalogs, which lists PTF by company. Table 1 is an ISO-NE PTF Catalog dated 1/23/02, which does not include the radial lines. Table 2 is a PTF Catalog for 2003 dated 7/15/03, which lists the Reading Tap Reading Town Line (211-503/504) on the second page.

If the RMLD had known that the 211-503/504 NSTAR lines had been reclassified as PTF, then the RMLD would have had the following two options.

- The RMLD could either have asked NSTAR to cancel its FERC Rate Schedule 125, the Radial Line Support rate, in which case NSTAR would recover the costs associated with the 211-503/504 lines ISO-NE Open Access Transmission Tariff under the RNS rate.
- The RMLD could have submitted the Radial Line Support costs for inclusion in the RMLD's PTF revenue requirement under the ISO-NE Tariff, in which case the RMLD would have been reimbursed for the Radial Line Support cost through the RNS rate.

I examined the billings for Radial Line Support from 2003 through 2009 and found that the RMLD had been billed \$1.1 million dollars during that period. Mr. Coyle and I had a conversation concerning the RMLD's best course of action with respect to recovery for the Radial Support charges from 2003 to 2009. Section K.1 of Rate Schedule 125 provides that "Reading shall not have the right to challenge any bill, invoice, or statement, bring any court or administrative action of any kind questioning the propriety of the same after a period of 12 months from the date it is rendered." Mr. Coyle advised that this kind of provision limiting refund rights has been upheld by both the FERC and the United States Court of Appeals for the First Circuit (which covers the New England region) in an earlier Boston Edison case.

After considerable discussion with Mr. Coyle, we decided that there was no solid legal argument to justify legal action against NSTAR to pursue further recovery with respect to the \$1.1 million in NSTAR billings. The twelve month look back in the Radial Line Support agreement was very clear. Going to court to try to recover these costs could be in the range of one hundred to two hundred thousand dollars with, what I am informed and believe to be, at best, a slim chance of success.

We then examined the ISO-NE RNS rate and found that it has a seventeen month look back for incorrect billing. I decided that the RMLD should apply to ISO-NE for the seventeen month look back. Using the ISO-NE look back, allows the RMLD to be

credited \$198,000 in Radial Line Support billings through the RNS rate over the next two years.

Based on all the foregoing considerations, I chose to use the RNS seventeen month relief from the RNS, which will be paid back in the form of a credit through the ISO-NE RNS monthly billing.

Legal cost for Duncan & Allen's services in this issue totaled \$5,600.

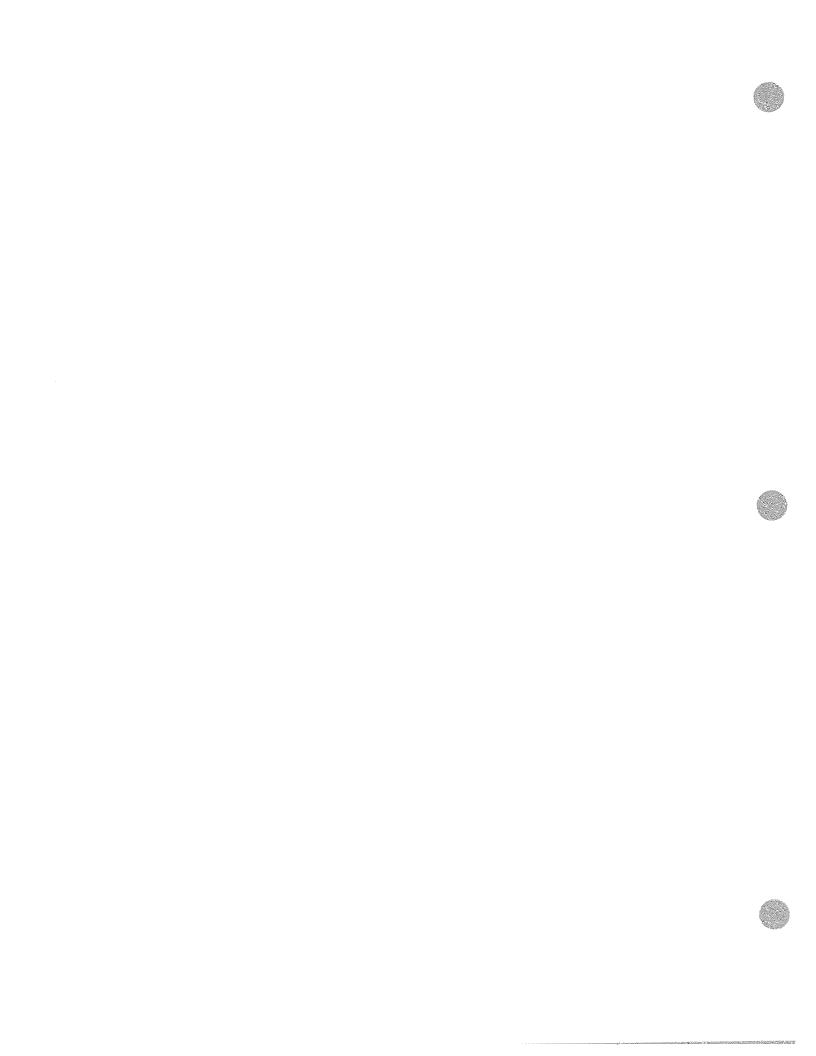
The RMLD will have an employee or representative monitor the ISO-NE Transmission, Reliability, and other committee meetings, so that any future issues affecting the RMLD will be brought to our attention immediately.

I contacted municipal electric utilities in Norwood, Belmont, and Wellesley who have transmission with NSTAR to see if they have similar agreements. Wellesley is served under Rate Schedule 167 for transmission service from NSTAR and is "deemed connected to PTF" under a 1980 settlement agreement of various FERC and antitrust claims. Norwood is connected to the NSTAR transmission system and there is no tap that requires a separate transmission arrangement. Belmont is connected to NSTAR at the 13.8 kV levels, which is not considered PTF, and has a separate and fairly complex interconnection agreement with NSTAR, the current version of which dates back to 1993.

As I have stated above, legal counsel and I could not identify a solid legal theory with respect to recovering past Radial Line Support charges outside of the seventeen month window available under the RNS rate. However, after reviewing Rate 125 (Attachment 3) I am having further discussions with counsel with respect to language in Rate 125, which specifically mentions the transmission lines 211-503/504 as being "non-PTF". I will keep you informed as to possible litigation in this issue.

I have reviewed other power supply contracts the RMLD has with parties and found that there are no outstanding issues similar to the NSTAR PTF issue.

In hindsight, I realize I should have reviewed this issue with the RMLD Board earlier due to the magnitude of the unrecovered transmission charges and the question of possible litigation.



# TABLE 1

# Boston Edison Company Lower Voltage PTF

TINE	\$	CONDUCTOR	3 8	NO OF	MILES	CKT
Mystic #250 Everett - Woburn #211 (211-514)	115	1250 Cu	ا ا	-	7 70	
Mystic #250 - Everett (BECo) (BECO sec. of 423-515)	115	1250 Cu	) <u>'</u>	- ,	77.7	7/7
Mystic #250, Everett - Chelsea #488 (BECo) (BECO ser of 488 519)	1		3	-	0.31	0.31
(910-90 <del>4-10-795-00-40-7-7-7-7-7-7-7-7-7-7-7-7-7-7-7-7-7</del>	315	2250 Cu 795 AI	9 H		0.22	1.32
Chelsea #488 - Revere (BECo) (128-518)	115	795 AI	ĕ	-	9	i G
Mystic #250, Everett - Somerville #402 (329-510/511)	115	1250 Cu	; <u>e</u>	- ი	S 6	0.85
Somerville #402 - Brighton #329 (329-510/511)	4		2	y.	98	3.96 3.96
	2	1250 Cu	S C	2	2.59	5.18
Ningston Street #514 - Carver St. #71 (329-512/513)	115	2250 Cu	2	5	1 10	2.20
Carver St. #71 - Scotia St. #492 (329-512/513)	115	1500 Cu	<u>g</u>	, ,	3 4	7.7
Scotia St. #492 - Brighton #329 (329-512/513)	115	1500 Cu	) <u>'</u>	، د	<del>*</del> 6	3.08
Kingston St. #514 - Colburn St. (110-510/511)	115	3500.41	) (	٧	7.08	5.76
Colburn St Washington St. Tag (110 F10/644)		<b>C</b> 2000	3	2	3.45	06.90
(110-010-011)	115	1750 AI	၅	2	2.10	4.20
Brighton #329 - Washington St. (110-510/511)	115	1250 Cu	nc	2	1.26	25
Washington St. Tap - Baker St. #110 (110-510/511)	115	1250 Cu	90	۰	7 46	40.00
Bnghton #329 - Watertown #467 (282-520/521)	115	1250 Cu	9	, ,	2 6	76.01
Watertown #467 - Waltham #282 (282-520/521)	115 1	1250 C.,	' (	ı	3	3.20
Brighton #329 - N - Park and		200	3	2	4.79	9.58
3.23-23-33 (421)	115 2	2250 Cu	nc	2	2.85	5.70
Waltham #282 - Trapelo Rd. #450 (320-507/508)	115 4	4/0 Cu	HO	2	2.66	5,32
					)	40.0

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LINE	≩	CONDUCTOR	용된	NO OF CKTS	MILES	CKT
Trapelo Rd. #450 - Lexington #320 (320-507/508)	115	4/0 Cu	Ö	2	2.54	5.08
Lexington #320 - Hartwell Ave. #533 (533-508)	115	1113 ACSR	ð	-	1.90	1.90
Hartwell Ave. #533 - Burlington #391 (391-508)	115	1113 ACSR	Ö	-	2.64	2.64
Burlington #391 - Woburn #211 (211-508)	115	1113 ACSR	Ö	-	3.74	3.74
Woburn #211 - North Wobum Tap (211-503/504)	115	795 ACSR	ŏ	2	4.06	8.12
North Woburn Tap - Billerica Town Line (BECo) (211-503/504)	115	795 ACSR	Ö	2	2.17	4.34
Holbrook #478 - Swift's Beach Tap (478-502)	115	556.6 ACSS 2-1000 Cu	HO DO		4.93 0.10	4.93
Swiff's Beach Tap - Braintree Line (478-502)	115	636 ACSS	Ö	-	0.16	0.16
Swift's Beach Tap - Edgar #150, Weymouth (478-502)	115	9/27/1901	Ö	-	1.03	1.03
Holbrook #478 - E. Weymouth Tap (478-503)	115	556.5 ACSS 1000 Cu 750 Cu	0 C C O		4.93 0.10 0.10	5.13
E. Weymouth Tap - Edgar #150, Weymouth (478-503)	115	636 ACSS	₽	-	1.03	1.03
Holbrook #478 - East Weymouth Tap (478-508)	115	795 ACSR 750 Cu SCOF	9 9		4.95 0.08	4.95 0.08
East Weymouth Tap - Edgar #150, Weymouth (478-508)	115	795 ACSR	Ö	<b></b>	96.0	0.98
Holbrook #478 - Grove St. Tap (478-509)	115	795 ACSR 750 Cu SCOF	OH		1.73	1.73

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LINE	≩l	CONDUCTOR	옹	NO OF	MILES	CKT MI ES
Grove St. Tap - Mid Weymouth Tap (478-509)	115	795 ACSR	Ö	-	1 60	
Mid Weymouth Tap - Edgar #150. Weymouth (478-509)	115	795 ACSR	Š	· .	60.	8 - 3
Holbrook Tap- Auburn St. #451, Whitman (451-536)	115	2-1590 ACSR &	5 3	- ,	10.7	7.61
		2-795 ACSR	5	-	7.42	7.42
Holbrook #478 - Holbrook Tap (451-536)	115	2-795 ACSR	Ö	<del></del>	0	č
Holbrook #478 - South Randolph Tap (447-508/509)	115	795 ACSR	Ą		23 6	0.0
South Randolph Tap - Canton #470 (447-508/509)	115	795 ASCR	ā	c		
Canton #470 - Norwood Tap (447-508/509)	115	795 ACSP	5 8	7 (	8/.9	13.56
Norwood Tap - Walpole #146 (447-508/509)			5	7	0.72	1.44
Walpole #146 W W. alaka	2	190 ACSK	ĕ	5	4.15	8.30
	115	795 ACSR	Ö	2	0.64	1 28
W. Waipole #447 - Medway #65 (65-502)	115	556.5 ACSS	Ð	-	3 33	2 0
W. Walpole #447 - Medway #65 (65-508)	115	4/0 HT Cu	3	- ,	30.6 0.00	9.32
W. Walpole #447 - Dover #456 Tap (148-522)	115	2.795 AI	5 8	- ,	90.5	99 6
Dover #456 Tap - Newtharn #148 (148 523)			5	<b>-</b> -	5.64	5.64
(776-941) 0414 (1191)	115	2-795 AI	OHO	-	3.77	5.08
		2-1250 Cu	9 0	-	1.31	<b>!</b>
Medway #b5 - Milford/Millbury Town Line (BECo) (201-501)	115	795 AI	Ð	-	2 02	202
Bellingham - Milford Town Lines (BECo) (201-502)	115	795 ACSP	ā			30:3
Sherborn #274 - Machani #65 1074 100			5	-	2.02	2.02
(5/4-209)	115	954 ACSR	Ą	-	9.35	9.35

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LINE	<b>≩</b>	CONDUCTOR	용됨	NO OF	MILES PER CKT	CKT
Framingham #240 - Sherborn #274 (240- 508)	115	795 ACSR	Ą	<del>-</del>	1.51	1.51
Sherborn #274 - W. Framingham #455 (455-507)	115	795 ACSR	ĕ	-	5.75	5.75
W Framingham #455 - Str. 81, Southborough (BECo) (513-507)	115	795 ACSR	Ð	-	96.0	96:0
Framingham #240 - Needham #148 (240-510)	115	954 ACSS	₽	<b>*</b> -	9.15	9.15
Needham #148 - Baker St. #110 (240-510+110-522)	115	2-954 AI	Ą	2	3.80	7.60
Framingham #240 - Speen St. #433 (433-507)	115	1113 ACSR	Ð	-	4.43	4.43
Speen St. #433 - Sudbury #342 (342-507)	115	350 HT Cu	Ö	-	3.49	3.49
Sudbury #342 - Waltham #282 (282-507)	115	954 ACSS 2250 CU	НО Э	<del></del>	7.19 <b>0.06</b>	7.25
TOTAL BOSTON EDISON COMPANY LOWER VOLTAGE PTF CKT. MILES						251.00
TOTAL BOSTON EDISON COMPANY CKT. MILES						442.60

TOTAL BOSTON EDISON COMPANY CKT. MILES









FINE	≩	CONDUCTOR	8 €	NO OF	MILES PER CKT	CKT
Mystic #250 Everett - Woburn #211 (211-514)	115	1250 Cu	nc	-	7 72	7.72
Mystic #250 - Everett (BECo) (BECO sec. of 423-515)	115	1250 Cu	ng	***	0.31	0.31
Mysuc #250, Everett - Chelsea #488 (BECo) (BECO sec. of 488-518)	115	2250 Cu 795 Al	S &	<b></b>	0.22	1 32
Chelsea #488 - Revere (BECo) (128-518)	115	795 AI	₹	-	0.85	0.85
Mystic #250, Everett - Somerville #402 (329-510/511)	115	1250 Cu	ne	2	1.98	3.96
Somerville #402 - Brighton #329 (329-510/511)	115	1250 Cu	nc	2	2.59	5.18
Kingston Street #514 - Carver St. #71 (329-512/513)	115	2250 Cu	ng	2	1 10	2.20
Carver St #71 - Scota St #492 (329-512/513)	115	1500 Cu	ng	2	1.54	3 08
Scotia St. #492 - Brighton #329 (329-512/513)	115	1500 Cu	ne	. 8	2 88	5.76
Kingston St. #514 - Colburn St. (110-510/511)	115	3500 AI	9	2	3.45	06 9
Colburn St Washington St. Tap (110-510/511)	115	1750 AI	ng	2	2.10	4.20
Brighton #329 - Washington St. (110-510/511)	115	1250 Cu	nc	8	1.26	2.52
Washington St. Tap - Baker St. #110 (110-510/511)	115	1250 Cu	on	2	5.46	10.92
Brighton #329 - Watertown #467 (282-520/521)	115	1250 Cu	9n	2	2 63	5.26
Watertown #467 - Waltham #282 (282-520/521)	115	1250 Cu	9 N	2	4 79	9.58
Brighton #329 - N Cambridge #509 (329-530/531)	115	2250 Cu	ng	2	2.85	5.70
Waltham #282 - Trapelo Rd #450 (320-507/508)	115	4/0 Cu	ĕ	5	2 66	5.32

Boston Edison Company Lower Voltage PTF

LINE	<b>≩</b>	CONDUCTOR	용된	NO OF	MILES PER CKT	CKT
Trapelo Rd #450 - Lexington #320 (320-507/508)	115	4/0 Cu	Ð	2	2.54	5.08
Lexington #320 - Hartwell Ave. #533 (533-508)	115	1113 ACSR	Ö	-	1.90	1.90
Hartwell Ave. #533 - Burlington #391 (391-508)	115	1113 ACSR	¥	-	2.64	2.64
Burlington #391 - Woburn #211 (211-508)	115	1113 ACSR	¥	-	3.74	3 74
Woburn #211 - North Woburn Tap (211-503/504)	115	795 ACSR	동	2	4.06	8.12
North Woburn Tap - Bilterica Town Line (BECo) (211-503/504)	115	795 ACSR	Æ	2	2.17	4.34
North Woburn Tap - Reading Tap (211-503/504)	115	795 ACSR	Ð	8	2.28	4.56
Reading Tap - Reading Town Line (211-503/504)	115	795 AI	₹	7	1,42	2.84
Holbrook #478 - Swift's Beach Tap (478-502)	115	556.6 ACSS 2-1000 Cu	OH ON		4.93 0.10	4.93
Swift's Beach Tap - Braintree Line (478-502)	115	636 ACSS	Ą	-	0.16	0.16
Swift's Beach Tap - Edgar #150, Weymouth (478-502)	115	636 ACSS	Ą	-	1.03	1.03
Holbrook #478 - E. Weymouth Tap (478-503)	115	556.5 ACSS 1000 Cu 750 Cu	0 O O O		4.93 0.10 0.10	5.13
E. Weymouth Tap - Edgar #150, Weymouth (478-503)	115	636 ACSS	Ö	-	1 03	1.03
Holbrook #478 - East Weymouth Tap (478-508)	115	795 ACSR 750 Cu SCOF	9 9		4.95	4.95 0.08
East Weymouth Tap - Edgar #150, Weymouth (478-508)	115	795 ACSR	ð	-	86.0	86:0

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808	Boston Edison Company Lower Voltage PTF
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LINE	Ş	CONDUCTOR	용된	NO OF	MILES	CKT
Holbrook #478 - Grove St. Tap (478-509)	115	795 ACSR 750 Cu SCOF	O H	<del>-</del>	1 73	173
Grove St Tap - Mid Weymouth Tap (478-509)	115	795 ACSR	Ą	<del></del>	1.58	5.88
Mid Weymouth Tap - Edgar #150. Weymouth (478-509)	115	795 ACSR	Ą	-	2.61	261
Holbrook Tap- Auburn St. #451. Whitman (451-536)	115	2-1590 ACSR & 2-795 ACSR	Ö	-	7.42	7 42
Holbrook #478 - Holbrook Tap (451-536)	115	2-795 ACSR	Ą	-	001	0.01
Holbrook #478 - South Randolph Tap (447-508/509)	115	795 ACSR	Ą	2	2.39	4 78
South Randolph Tap - Canton #470 (447-508/509)	115	795 ASCR	Ö	8	6 78	9
Canton #470 · Norwood Tap (447-508/509)	115	795 ACSR	Ą	١٥	27.0	3.30
Norwood Tap (447-508) to Norwood Town Line	115	795 ACSR	H	ı <del>.</del>	7 6	4 6
Norwood Tap (447-509) to Norwood Town Line	115	795 ACSR	. ₹	- +	<u> </u>	1.03
Norwood Tap - Walpole #146 (447-508/509)	115	795 ACSR	E	-	 	<b>3</b>
Walpole #146 - W Walpole #447 (447-508/509)	115	795 ACSR	E	۰ ،	r 0	8.30 • 30
W Walpole #447 - Medway #65 (65-502)	115 €	556.5 ACSS	HO.	ı –	to 6	9 7 6
W Walpole #447 - Medway #65 (65-508)	115 5	556.5 ACSS	Ą	· <del>-</del>	30.6	25.6 9.66
W Walpole #447 - Dover #456 Tap (148-522)	115 2	2-795 AI	о Н	-	5.64	564
456 Tap - Needham #148 (148-522)	115 2	2-795 AI	HO H	-	3.77	5 08
CNE ENA						

NO OF	CKTS
3	됭
	CONDUCTOR
	<b>≩</b>

CKT

2-1250 Cu

MILES PER CKT ၅

1.31

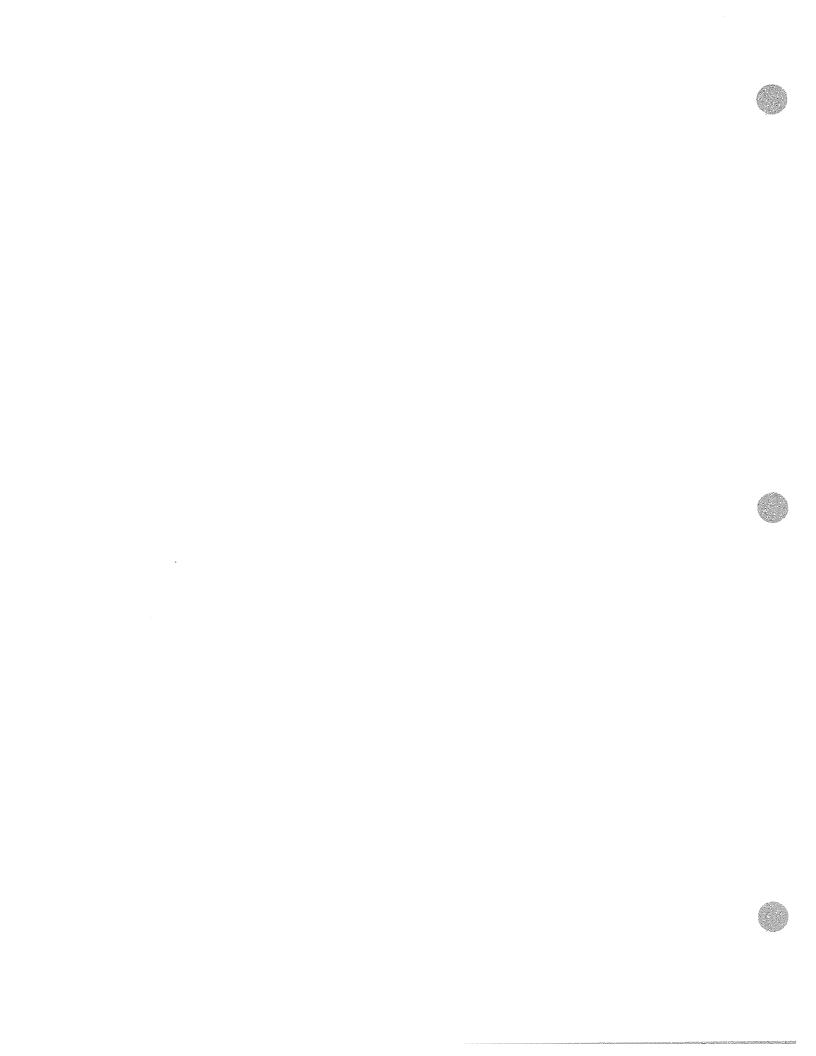
SO-NE FINAL

LINE

Boston Edison Company Lower Voltage PTF

LINE	<b>≩</b>	CONDUCTOR	공원	NO OF	MILES	CKT
Medway #65 · Milford/Millbury Town Line (BECo) (201-501)	115	795 AI	Ą	-	2.02	2 02
Bellingham - Milford Town Lines (BECo) (201-502)	115	795 ACSR	ō	-	2.02	2 02
Sherborn #274 - Medway #65 (274-509)	115	954 ACSR	Ą	-	9.35	9 35
Framingham #240 - Sherborn #274 (240-508)	115	795 ACSR	O	•	1.51	151
Sherborn #274 · W Framingham #455 (455-507)	115	795 ACSR	Ą	-	5.75	5 75
W Framingham #455 - Str 81, Southborough (BECo) (513-507)	115	795 ACSR	Ą	-	0.95	96:0
Framingham #240 - Needham #148 (240-510)	115	954 ACSS	Ą	-	9.15	9 15
Needham #148 - Baker St. #110 (240-510+110-522)	115	2-954 Ai	Ю	2	3.80	09'2
Framingham #240 - Speen St. #433 (433-507)	115	1113 ACSR	Ю	-	4.43	4.43
Speen St #433 · Sudbury #342 (342-507)	115	350 HT Cu	용	-	3.49	3.49
Sudbury #342 - Waltham #282 (282-507)	115	954 ACSS 2250 CU	OH OC		7 19 0.06	7.25
TOTAL BOSTON EDISON COMPANY LOWER VOLTAGE PTF CKT. MILES					•	260.50
TOTAL BOSTON EDISON COMPANY CKT. MILES					•	457.03

SO-NE FINAL



#### ATTACHMENT 1

May 27, 2011

#### **MEMORANDUM**

TO:

Vincent F. Cameron, Jr., General Manager

FROM:

John P. Coyle

RE:

Recommendation Concerning Termination of NStar FERC Rate

Schedule No. 125 and Related Issues

On May 18, 2011, as we had previously discussed, I wrote to NStar Associate General Counsel Neven Rabadjija and Assistant General Counsel Mary Grover, requesting that NStar: (1) initiate cancellation of its FERC Rate Schedule No. 125. (2) immediately cease invoicing RMLD under that rate schedule, and (3) refund to RMLD the past twelve months of payments collected under that rate schedule. On May 25, Ms. Grover responded to my letter. explaining that NStar would initiate cancellation of Rate Schedule No. 125. However, Ms. Grover also advised that NStar was unwilling to provide refunds because (1) NStar had historically reduced its Regional Network Service revenue requirement to reflect payments by RMLD under Rate Schedule No. 125, and (2) RMLD was entitled to recover its payments under Rate Schedule No. 125 as support payments for PTF under RMLD's own Regional Network Service revenue requirement (submitted annually under Schedule 9 of the ISO-NE Open Access Transmission Tariff). Ms. Grover therefore suggested that: (1) NStar will submit a notice of cancellation of Rate Schedule No. 125 to the FERC. for cancellation effective June 1, 2011; (2) RMLD should seek to recover its payments under Rate Schedule No. 125 through Regional Network Service rates by submitting those payments for calendar year 2010 as part of its RNS revenue requirement effective June 30, 2011; and (3) RMLD should seek to recover its January through May 2011 payments as part of its 2012 RNS revenue requirement submission.

After having reviewed NStar's proposal with Frank Radigan of the Hudson River Energy Group, who is in the process of preparing RMLD's RNS revenue requirements submissions, and Bill Seldon, we concluded that Ms. Grover's proposal actually represents a preferred outcome for RMLD. Using the RNS revenue requirement mechanism to recoup past payments (as explained in Mr. Radigan's e-mail of May 26, 2011) results in a greater recovery for RMLD than we believe would be achievable through seeking a straight refund from NStar through FERC proceedings. As Mr. Radigan explains:

## Duncan & Allen

The RNS filing includes the support payments for Schedule 125. For this year it increases your RNS revenue requirement by \$140,000 plus another \$140,000 in a true-up as you incurred this expense last year but did not recover it in your RNS rates. Next year, 2012, your actual Schedule 125 will only be \$58,000 so you will have to give back \$82,000 in the true up next year. Of course the next year, 2013, there will be no expense so you will have to credit back some money in that calculation. Lots of collections and credits but the net result will be a an increase in revenue requirement this year of \$280K, a credit next year of \$24K and a credit the year after that of \$58K for net increase in RNS revenue requirement of \$198K or 17 months of payments.

In contrast to the twelve months of refunds that we believe would be available under Section K.1 of Rate Schedule No. 125, the 17 months of recoupment of payments under the RNS revenue requirement approach offers RMLD a better net economic result. In addition, of course, taking the approach recommended by NStar reaches that result without the cost or risk of litigation.

Pursuant to your instructions yesterday, I spoke with Ms. Grover this morning. She agreed to make the cancellation filing effective June 1, 2011. NStar requests payment of the April and May invoices under Schedule No. 125. It is our expectation that NStar will issue a June invoice, as the cancellation will not have been accepted by FERC by the time that invoice is scheduled to issue (in July). Ms. Grover suggests holding payment of the June invoice pending FERC acceptance of the cancellation filing. I concur in that suggestion.

#### **ATTACHMENT 2**

## FEDERAL ENERGY REGULATORY COMMISSION WASHINGTON, D.C. 20426

#### OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To: Tampa Electric Company Docket No. ER11-3746-000 7/6/11

NSTAR Electric & General Counsel 800 Boylston Street, P1700 Boston, MA 02199-8003

Attention:

Mary E. Grover

Assistant General Counsel

Reference:

Notice of Termination

Dear Ms. Grover:

On June 1, 2011, NSTAR Electric Company (NSTAR) submitted a Notice of Termination<sup>1</sup> of a grandfathered agreement between NSTAR and the Town of Reading Municipal Light Department providing for the transmission of power to the Town of Reading, Massachusetts over certain radial transmission lines. You state that the parties have agreed to ease their administrative burden by terminating the grandfathered agreement.

Pursuant to the authority delegated to the Director, Division of Electric Power Regulation – East, under 18 C.F.R. § 375.307, your submittal filed in the above referenced docket is accepted for filing, effective June 1, 2011, as requested.

Notice of the filing was issued on June 8, 2011, with comments, protests or interventions due on or before June 24, 2011. No protests or adverse comments were filed. Notices of interventions and unopposed timely filed motions to intervene are granted pursuant to Rule 214 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.214). Any opposed or untimely filed motion to intervene is governed by the provisions of Rule 214.

This acceptance for filing shall not be construed as constituting approval of any service, rate, charge, classification, or any rule, regulation, or practice affecting such rate or service provided for in the filed documents; nor shall such action be deemed as

<sup>&</sup>lt;sup>1</sup> Notice Terminating FFRC Rate Schedule No. 125

recognition of any claimed contractual right or obligation affecting or relating to such service or rate; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against NSTAR.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713.

Sincerely,

Jignasa Gadani, Director Division of Electric Power Regulation – East

#### **ATTACHMENT 3**

Bo	6	t	on	Ed	130	n	Con	ıр	any	
									No	

Original Sheet No. 2 Effective:

### RADIAL LINE TRANSMISSION SERVICE OVER LINES 211-503 AND 211-504

#### I. Availability

Electric transmission service hereunder is available to the Town of Reading ("Reading") from Boston Edison Company ("Company") on two of the Company's existing non-PTF transmission facilities, Lines 211-503 and 211-504, for any Reading entitlement which qualifies for the NEPOOL PTF rates. Service hereunder is available only if, in the Company's judgment, there is sufficient capacity to provide such service on the said facilities. No provision of this rate schedule supersedes, modifies or otherwise affects rights and obligations under the NEPOOL Agreement or any pre-existing agreements between Reading and the Company.

#### II. Monthly Rate

Monthly charges for service rendered hereunder shall be equal to \$0.144/kw (fourteen and four-tenths cents per kilowatt) times Reading's transmission requirement for the month stated in kilowatts. Reading's transmission requirement for a month ("the billing month") shall be the maximum amount of kilowatts of capacity contracted for by Reading to which this rate schedule is applicable in the billing month provided that, for purposes of calculating the transmission charge, such amount shall be deemed to be at least 80% of the largest such amount for any month occurring within the same Capability Period as the billing month. Reading's transmission requirement shall not be reduced to reflect any reduced level at which deliveries may be actually made including any reductions in deliveries due to operating limits or availability of Reading's entitlements.

#### III. Terms and Conditions

Service under this rate schedule is subject to the following terms and conditions:

#### A. Obligations of the Parties

1. Reading by commencing to take the transmission service specified herein from the Company agrees to take and pay for, and the Company by commencing to furnish such service agrees to furnish the service, subject to the terms and conditions of this rate schedule as the same may be in effect from time to time.

ER 79-647 , roil

Boston Edison Company FERC Rate Schedule No. /25 Issued on: //29/24

Original Sheet No. 1 Effective: 11/10/79.

\*\*\* \*\*\*\*

FERC ELECTRIC RATE SCHEDULE NO. 125 OF

BOSTON EDISON COMPANY

RADIAL LINE TRANSMISSION SERVICE OVER LINES
211-503 AND 211-504

\_ DC S

Boston Edison Company FERC Rate Schedule No. Original Sheet No. 3 Effective:

- 2. One month prior to the beginning of each Power Year, Reading shall furnish the Company with a written statement setting forth its likely requirement in kw for service hereunder. As soon as Reading, by contract or otherwise, commits to a power transaction that will require transmission hereunder, Reading shall be obligated to give the Company written notification of the commencement and termination dates of any such transaction and the amount(s) and source of the power. Reading shall also be obligated to supplement such notification as soon as and whenever changes occur in its commitment.
- 3. In the event that the Company is required, pursuant to Part 35 of the regulations of the Federal Energy Regulatory Commission, to file with the Commission an amendment to this rate schedule to reflect a change in the amount of transmission service required by Reading under this rate schedule, Reading shall be obligated to reimburse the Company for any filing fee paid by the Company on account of said filing pursuant to Part 36 of the regulations of the Federal Energy Regulatory Commission.

#### B. Amendments

The Company shall have the right at any time to amend this rate schedule by filing with the Federal Energy Regulatory Commission (or such other regulatory agency as may have jurisdiction in the premises).

Nothing contained herein shall be construed as affecting in any way the right of the party furnishing service under this rate schedule to unilaterally make application to the Federal Energy Regulatory Commission for a change in rates, charges, classification, or service, or any rule, regulation, or contract relating thereto, under §205 of the Federal Power Act and pursuant to the Commission's Rules and Regulations promulgated thereunder.

#### C. Rights-of-Way and Permits

The obligations of the Company are subject to and conditioned upon its retaining all rights-of-way, franchises, locations, permits and other rights and approvals necessary in order to permit transmission service to be rendered under this rate schedule.

#### D. Character of Transmission Service

Transmission service will be furnished in the form of three-phase, sixty-cycle alternating current. Delivery voltage will be at 115,000 volts nominal.

Boston Edison Company FERC Rate Schedule No.

#### E. Interruption of Service

The Company shall not be responsible for any failure, interruption, reversal or abnormal voltage of the supply, if such failure, interruption, reversal or abnormal voltage is without wilful default or gross negligence on its part. Whenever the integrity of the Company's system or the supply of electricity is threatened by conditions on its system or on the systems with which it is directly or indirectly interconnected, or whenever it is necessary or desirable to aid in the restoration of service, the Company may curtail or interrupt electric service or reduce voltage to Reading pursuant to a load reduction plan, but if the plan fails to meet the emergency, then in its sole judgment, curtail or interrupt electric service or reduce voltage to Reading and such curtailment, interruption or reduction shall not constitute wilful default by the Company.

#### F. Load Reduction

The Company, at Reading's request, will furnish to Reading for its information and submit to the Federal Energy Regulatory Commission a copy of procedures (any any changes therein) to be employed by the Company in the event of load reduction. Reading will develop load reduction procedures for its electric system and provide a copy of such procedures to the Company.

#### G. Delivery, Receipt and Ownership of Facilities

- 1. All receipts and deliveries transferred under this rate schedule will be made normally at the border of the Company's territory.
- 2. All Company owned lines, apparatus and other equipment in the Company's territory up to the Company's points of delivery and receipt shall be maintained and operated by the Company. Reading shall provide without cost to the Company a suitable place for the installation of any of the Company's apparatus or other equipment which it is proper to locate on Reading's property. Reading shall be responsible for all damage to, or loss of, the Company's property located upon its premises unless occasioned by circumstances beyond Reading's control. All equipment furnished by the Company shall remain its property, and Reading shall give the Company permission to enter its premises upon reasonable notice for the purpose of installing, inspecting, testing and maintaining its equipment.
- 3. Lines, apparatus and other equipment as may be necessary in order to utilize the service, which are provided, maintained or operated by Reading, shall conform to good utility standards and operating practices, and such equipment shall be subject to inspection by the Company upon reasonable notice.

Boston Edison Company FERC Rate Schedule No.

Original Sheet No. 5 Effective:

### H. Metering Equipment and Electric Losses

- 1. The Company reserves the right to own and maintain the metering installation for determining the quantity and conditions of supply of electricity delivered hereunder. If new metering is required for this service Reading will reimburse the Company for all costs associated with the new metering equipment. Reading shall supply without cost to the Company a suitable place for the installation of the Company's metering equipment.
- 2. If at any time such equipment shall be found to be inaccurate by more than 2% up or down, the Company shall make it accurate and the charges and meter readings for the period of inaccuracy, so far as the same can reasonably be ascertained, shall be adjusted. However, no adjustment prior to the beginning of the month next preceding the month in which such equipment shall have been found to be inaccurate shall be made except by mutual agreement. In addition to regular routine tests, the Company shall have any meter tested at any time upon written request down the expense of the test shall be borne by Reading. The Company shall notify Reading of the time it plans to make its regular annual test and any special test requested by Reading so that Reading may have a representative present.
- 3. Electricity delivered under this rate schedule, at 115 kV, if metered on the secondary side of Reading's 115 kV stepdown transformers, will be compensated for transformer losses.
- 4. Electrical losses incurred in the transmission or transformation of power shall be solely for the account of Reading and Reading shall be entitled to delivery of the power purchased by it less any electrical losses incurred in the transmission or transformation thereof. To the extent that such losses are determined by NEPEX, such NEPEX loss determinations shall be used. In the event that NEPEX for any reason does not determine such losses, then losses shall be determined by the Company in accordance with good utility operating practice.

#### Billing and Payment

- 1. All bills shall be rendered monthly.
- 2. All bills shall be due and payable upon presentation.
- 3. Charges for the transmission of Reading's transfers across Lines 211-503 and 211-504 shall commence on the first day of service under this rate schedule.

Boston Edison Company FERC Rate Schedule No. Original Sheet No. 6 Effective:

4. When all or part of any hill shall not have been paid within thirty days after the date it is mailed by the Company, the Company shall charge and Reading shall pay simple interest on the amount outstanding for each day after the thirtieth day until the day payment is received. Such interest shall be computed at an day payment is received. Such interest shall be computed at an annual rate which is 2% in excess of the then prime rate offered annual rate which is 2% in excess of the then prime rate offered by the First National Bank of Boston, of its successors and assign.

#### J. Notices

Notices and specifications under this rate schedule shall be in writing, and shall be delivered or mailed to the Vice President, Power Supply Administration of the Company or the manager and/or other designee of Reading at their respective business addresses.

#### K. Miscellaneous

- 1. Reading shall not have the right to challenge any bill, invoice or statement, bring any court or administrative action of any kind questioning the propriety of the same after a period of 12 months from the date it is rendered. In the case of a bill, invoice or statement containing estimates, Reading shall not have the right to challenge its accuracy after a period of 12 months from the date it is adjusted to reflect the actual amounts due.
- 2. The NEPOOL Agreement as used herein means the New England Power Pool Agreement dated as of September 1, 1971 and as amended from time to time. Unless the context otherwise requires, words and terms used herein shall have the same meaning as in the NEPOOL Agreement.
- 3. In order to avoid imposition of a burden upon the Company with respect to the flow of kilovars, Reading shall maintain a power factor of not less than 92% lagging.
- 4. The Company's transmission and delivery obligation hereunder shall be limited to such electricity as is actually received by the Company from the generating units in which Reading has entitlements.

#### Attachment A

#### BOSTON EDISON COMPANY 211-503 AND 211-504 115KV RADIAL SUPPLY TO READING DEVELOPMENT OF UNIT RATE

A	is Total Carrying Charges - Annual	\$162,564
В	is Peak Demand of Town of Reading for the current power year. (7/25/79 - 3 PM)	76,640 KW
С	is the Coincident NEPOOL peak for the current power year	14,735 MW
D	is the NEPOOL Capability Responsibility for the current power year	18,080 MW
	Monthly Rate = $A \times C \times 1$ B   D   FZ	
	$= \frac{162,564 \times 14,735 \times 1}{76,640} \times \frac{1}{18,080} \times \frac{1}{12}$	
	= $2.12 \times .815 \times \frac{1}{12}$	

14.4¢/KW/Month

Attachment A

#### BOSTON EDISON COMPANY 211-503 AND 211-504 115KV RADIAL SUPPLY TO READING DEVELOPMENT OF UNIT RATE

14.4c/KW/Month

# BOSTON EDISON COMPANY 211-503 AND 211-504 115KV RADIAL SUPPLY TO READING SUMMARY OF ESTIMATED CARRYING CHARGES

7	investment Base	6/30/78	6/30/79	Average
A B	. Depreziable Investment . Non-Depreciable Investment	\$671,358 123,443	\$777,020 123,443	\$724,189
D	. Total Gross . Depreciation Reserve	794,801 205,851	900,463 254,520	123,443 847,632 - 230,185
	Net Investment  orking Capital  Operation and Maintenance (.125	- P)		617,447
д. Н.	Material & Supplies (.005 x A) Total Working Capital	x r)	4	1,060 3,621 4,681
I.	Investment Base			\$622,128
	rying Charges			
K. L. M. N.	L/T Debt (.0384 x I)  Preferred/Preference (.0111 x I)  Common (.0490 x I)  Income Tax (.0589 x I)  Depreciation (.0300 x A)  Local Tax (.03683 x C)  0 & M (.0100 x C)  A & G (.0038 x C)  Total Carrying Charge - Annual			\$ 23,890 6,906 30,484 36,643 21,726 31,218 8,476 3,221
	Total Carrying Charge ~ Annual			\$162,564

# Boston Edison Company Lines #211-503 and #211-504 Cost of Money

Deht Cost 1.51% .341\* x 4.43 1961 Investment 6.16%.659\* x 9.34 1970 Investment 7.67% Weighted Preferred 1.51%  $.341* \times 4.43$ 5.87% 1961 Investment .659\* x 8.90 1970 Investment 7.38% Weighted

### Weighted Cost of Money

Debt Preferred Common	15%	x 7.67% x 7.38% x 14.00%	= 3.847 = 1.117 = 4.907 9.857	6.01
Total			7.020	

#### \*Racios

The Control of the Co	Allocated Investment	Assigned Investment	Total
	289,031	505,769	
6/30/78	289,031	611,432	
6/30/79	289,031	558,601	847,632
Average	341	. 659	1.00
2 Average	. 342		

#### Income Tax

$$\frac{(6.01)(.4951)}{(1.0 - .4951)} = 5.897$$

#### BOSTON EDISON COMPANY

Attachment D

#### Total First Mortgage Bonds Rate

### Tast Year Ended December 31, 1976 (\$000)

Line	Title Col.A	Amount Outstanding Col.B	Cost Rate at Net Proceeds Col.C	Interest Cost Col.D	Weighted Average Cost of Debt Capital Col.E
1.	Series B	\$ 13,688	2.67% <u>5</u> /	\$ 365	,
2.	Series D	15,000	3.15 <u>5</u> /	473	
3.	Series E	18,000	2.98 <u>5</u> /	536	
4.	Series F	25,000	4.60 6/	1,150	
<b>5</b> .	Series H	15,000	4.43 6/	665	
6.	Series I	25,000	4.74 <u>6</u> /	1,125	
7.	Series J	40,000	6.07 7/	2,428	•
8.	Series K	50,000	6.88 7/	3,440	
9.	Series L	50,000	9.01 7/	4,505	
10.	Series M	60,000	9.34 <u>8</u> /	5,604	
11.	Series N	75,000	8.09 <u>x</u> /	6,068	
12.	Series 0	60,000	12.60 <u>8</u> /	7,560	
13.	Series P	60,000	9.25 <u>a</u> /	5,550	,
14.	Series Q	49,500	9.81 <u>9</u> /	4,856	
15.	Total First Mortgage Bonds	\$556.188 3/		\$44.385	 7.98% 3 / _

#### Attachment E

# PROJECTED REVENUES FROM NON-FIRM RADIAL LINE TRANSMISSION SERVICE LINES 211-503 AND 511-504 TO TOWN OF READING

			Rate \$/ <b>kW/Mo</b> -	Revenue 11/01/79 to 10/3 <u>1/80</u>
Sale From  Montaup Electric Co.	Amount 4.5 MW	Unit Canal No. 2	\$0.144	\$7,776.00

### UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

)

Boston Edison Company

Docket No. ER79-647

NOTICE OF RATE SCHEDULE FILING

(September 17,1979)

The filing Company submits the following:
Take notice that on September 10, 1979 Boston Edison
Company (Edison) tendered for filing a rate schedule for
the transmission of power to the Town of Reading, Massachusetts over certain radial transmission lines.

Edison requests an effective date for the rate schedule of November 10, 1979.

Edison states that it has served the filing on the Town of Reading and the Massachusetts Department of Public Utilities.

Any person desiring to be heard or to protest said application should file a petition to intervene or protest with the Federal Energy Regulatory Commission, 825 North Capitol Street, N.E., Washington, D.C. 20426, in accordance with §§1.8 and 1.10 of the Commission's Rules of Practice and Procedure (18 CFR 1.8, 1.10). All such petitions or protests should be filed on or before October 5, 1979.

Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a petition to intervene. Copies of this application are on file with the Commission and are available for public inspection.

Kenneth F. Plumb Secretary

RECEIVED

SEP 2 1 1979

CSH

DC-A-5

