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October 21, 2005

VIA ELECTRONIC FILING

Honorable Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Berkshire Power Company, LLC; Nos. ER05-1179-000; and -001

Dear Ms. Salas:

Transmitted electronically for filing is the Motion for Leave to Answer and Answer of ISO New England Inc. in the above-captioned dockets.

If there are any questions concerning this filing, please call me at (202) 661-7616.

Very truly yours,

/s/

Perry D. Robinson
Counsel for
ISO New England Inc.

Enclosure

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

Berkshire Power Company, LLC)	Docket No. ER05-1179-000
)	Docket No. ER05-1179-001
)	

**MOTION FOR LEAVE TO ANSWER AND ANSWER OF ISO NEW ENGLAND INC.
TO THE PETITION FOR REHEARING OF
MASSACHUSETTS MUNICIPAL WHOLESALE ELECTRIC COMPANY**

Pursuant to Rule 213 of the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) Rules of Practice and Procedure, 18 C.F.R. § 385.213 (2005), ISO New England Inc. (“ISO”)¹ hereby submits its Answer to the Petition for Rehearing (“Petition for Rehearing”) of Massachusetts Municipal Wholesale Electric Company (“MMWEC”). MMWEC requests rehearing of the Commission’s September 6, 2005 order in *Berkshire Power Company, LLC*, 112 FERC ¶ 61,253 (2005) (“September 6 Order”).

Because an answer is not normally permitted in response to rehearing requests, the ISO hereby moves, pursuant to Rule 212 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2005), for leave to file an answer. The Commission has the authority to waive the prohibition against answers to rehearing requests for good cause. *See* 18 C.F.R. § 385.101(e) (2004). The Commission has found good cause to permit answers where they are otherwise prohibited in various circumstances, including where the answer would assure a complete record in the proceeding, *see, e.g., Pacific Interstate Transmission Co.*, 85 FERC ¶ 61,378, at p. 62,443 (1998), *reh’g denied*, 89 FERC ¶ 61,246 (1999), provide information helpful to the disposition of

¹ Capitalized terms used but not defined in this filing are intended to have the same meaning given to such terms in Market Rule 1 and the ISO-NE Transmission, Markets and Services Tariff (“ISO Tariff”).

an issue, *see, e.g., CNG Transmission Corp.*, 89 FERC ¶ 61,100, at p. 61,287 n.11 (1999), permit the issues to be narrowed or clarified, *see, e.g., PJM Interconnection, LLC*, 84 FERC ¶ 61,224, at p. 62,078 (1998); *New Energy Ventures, Inc. v. Southern California Edison Co.*, 82 FERC ¶ 61,335, at p. 62,323 n.1 (1998), or aid the Commission in understanding and resolving issues. *See, e.g., Tennessee Gas Pipeline Co.*, 92 FERC ¶ 61,009, at p. 61,016 (2000). The ISO believes that its answer will assure a more complete record in this proceeding and otherwise assist the Commission in understanding and resolving the issues presented.

I. STATEMENT OF ISSUES

The ISO separately lists below the issues it raises in this pleading pursuant to the Commission's recent changes to Rules 203 and 713 of the Commission's Rules of Practice and Procedure:²

- MMWEC incorrectly asserts that the West Springfield 3 and Berkshire generating facilities operate as "alternatives" for each other and, thus, RMR treatment is only appropriate for one facility. In addition, MMWEC asserts that the Commission erred by failing to consider that both facilities would be subject to an RMR agreement. MMWEC's assertion of Commission error is based on its own misunderstanding that both units are not needed for reliability. Therefore, the alleged grounds for the Commission's error do not exist and the request for rehearing regarding this point should be denied.

II. BACKGROUND

On June 30, 2005, Berkshire Power Company, LLC ("Berkshire") filed an unexecuted Reliability Must Run Agreement ("RMR Agreement") between it and the ISO pursuant to Sections 205 of the Federal Power Act, and Part 35 of the Commission's regulation. In a letter dated May 6, 2005, the ISO notified Berkshire that the ISO had determined Berkshire's 245 MW

² Revision of Rules of Practice and Procedure Regarding Issue Identification, 70 Red. Reg. 55,723 (Sept. 23, 2005). By listing issues relevant to this pleading, the ISO does not waive any issues previously raised in its July 22, 2005 Motion to Intervene Out of Time and Comments.

generating facility was needed for system reliability. The Commission, in its September 6 Order, conditionally accepted Berkshire's RMR Agreement, suspended it for a nominal period, and made it effective as of July 1, 2005 subject to refund. The Commission also set the matter for hearing and established settlement judge procedures.

MMWEC filed its Petition for Rehearing on October 6, 2005. MMWEC lists three issues where it believes the Commission erred. One of these issues concerns the ISO's determination that the Berkshire generating facility is needed to maintain reliability.³ As discussed in more detail below, MMWEC's specification of error is incorrect because MMWEC has based its assertion on its own misunderstanding that the continued operation of another generating unit would remove the reliability need for the Berkshire unit and, therefore, the ISO requests that MMWEC's argument be rejected.

III. ANSWER TO PETITION FOR REHEARING

A. MMWEC Misunderstands The Studies Supporting ISO's Determination Of Reliability Need For The Berkshire Generating Plant And, Thus, MMWEC's Specification Of Error Should Be Rejected

MMWEC challenges the Commission's finding that Berkshire has demonstrated a reliability need.⁴ The basis for MMWEC's challenge rests upon two related points. First, MMWEC claims that the "West Springfield 3 and Berkshire facilities operate as potentially acceptable alternatives."⁵ Furthermore, MMWEC asserts that the Commission erred "in failing to address whether (and, if so, why) an RMR agreement is needed or should be approved for Berkshire where the reliability need the agreement is intended to address can presumably be met

³ Petition for Rehearing at pp. 5-6, 14-16.

⁴ *Id.* at p. 14.

⁵ *Id.*

through an agreement involving the West Springfield unit 3, at considerably lower cost to consumers.”⁶

As to MMWEC’s first point, even though MMWEC was present at the Reliability Committee meeting in which the Berkshire and West Springfield 3 reliability determinations were reviewed with participants, it appears that MMWEC has misunderstood the results of those individual reliability determinations.

In determining whether a generating unit is needed for reliability, the ISO studies the impacts of removing the unit from the bulk electricity transmission system in order to determine if the unit could be allowed to retire or deactivate without violating reliability criteria. With the potential RMR resource completely unavailable, and consistent with the reliability criteria contained in ISO Planning Procedure No. 3, “Reliability Standards For The New England Area Bulk Power Supply System” (“PP3”) and NPCC A2, “Basic Criteria for Design and Operation of Bulk Power Systems” (“A2”), the next step in the analysis is for the ISO to assume the forced outage of the largest remaining generation resource for the affected area (*i.e.* the temporary unavailability of the largest remaining unit due to equipment breakage or other event that renders that unit temporarily out-of-service).

With this scenario defined, the third step is for the ISO to determine whether the remaining generation resources, as supported by the existing transmission infrastructure, can meet the contingency requirements set forth in the applicable ISO and NPCC reliability criteria (*e.g.*, ISO Operating Procedure No. 19, Transmission Operations (“OP-19”)⁷, PP3, and A2). In order to avoid violating these reliability criteria, the ISO must ensure that the transmission

⁶ *Id.* at p. 16.

system can sustain the most severe single contingency (consistent with these criteria) without causing: (1) equipment damage due to thermal overload; (2) cascading thermal overloads; (3) excessively high or low voltage or voltage collapse; (4) unit or area instability; or (5) undamped oscillations (in other words, without causing a loss of critical facilities or portions of the bulk power system).

As explained in the attached reliability study (Attachment, pp. 5-6),⁸ with the Berkshire generating facility unavailable due to deactivation or retirement, and with the remaining largest generation resource “out of service” (*i.e.*, due to an assumed forced outage) - which turns out to be the West Springfield 3 unit, the ISO concludes that the “East Springfield to Breckwood 115kV (1322) circuit would exceed the LTE [Long Time Emergency] rating during many hours in the year for operational contingencies” and, thus, “[t]his would violate OP-19.” While not stated explicitly in the Attachment, this situation also violates the criteria expressed in PP3 and A2. Thus, the reliability determination is that Berkshire is “needed for reliability” because it would not be permitted to deactivate or retire.

Using the same analytical methodology, when the ISO evaluated the reliability need of the West Springfield 3 unit against the applicable reliability criteria (Attachment, pp. 1 and 3), the study revealed that, with West Springfield 3 unavailable due to deactivation or retirement and the largest remaining generation resource “out of service” - which under this scenario is the Berkshire generation facility, the LTE rating of the 1322 circuit would be exceeded for 258 hours during 2005. “This exceedence would be in violation of ISO New England Operating Procedure

(...continued)

⁷

The provisions of OP 19 are intended to meet the various applicable requirements of the Northeast Power Coordinating Council (“NPCC”).

No. 19 - Transmission Operations.” (Attachment, p. 1). Similarly, the PP3 and A2 criteria are also violated. Thus, the reliability determination is that West Springfield 3 is “needed for reliability” because it would not be permitted to deactivate or retire.

Based on the foregoing, MMWEC’s assertion regarding reliability need is incorrect. The two facilities do not present a choice of one or the other unit for RMR treatment (as if they were somehow interchangeable), but rather both units are needed for reliability as demonstrated by the independently applied analysis for each facility.

Moreover, MMWEC’s related assertion that the Commission failed to consider that both units might be under an RMR agreement is irrelevant. The reliability determination conducted by the ISO is a purely resource-based analysis.⁹ The fact that one or both of the units might be under an RMR agreement is an only an economic consideration, and presents no additional operational implications beyond those already considered against the OP-19 requirements.

Therefore, based on the above discussion, the ISO respectfully submits that MMWEC’s specification of error is based on its own misunderstanding, that the grounds for the assertion of error by the Commission do not exist, and that the request for rehearing regarding this issue should therefore be rejected.

(...continued)

⁸ The two reliability stud is available on the ISO’s website at http://www.iso-ne.com/genrtion_resrcs/reports/rmr/index.html.

⁹ The fact that a generation resource is subject to an RMR agreement cannot prevent the resource from experiencing a forced outage.

IV. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission accept its Answer and reject the argument made by MMWEC.

Respectfully submitted,

/s/

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/s/

Theodore J. Paradise
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Dated: October 21, 2005

ATTACHMENT

Final Report

Summary of System Planning and Operations Reports Supporting the Need for West Springfield 3 for System Reliability

P. K. Wong, and J. E. Platts
March 14, 2005

I. Background

On January 3, 2005, Con Edison Energy of Massachusetts, Inc. (CEEMI) requested that discussions begin between ISO-NE and CEEMI regarding a Reliability Must Run Agreement for their West Springfield 3 unit (Asset ID #633). As part of this request, CEEMI asked ISO-NE to determine the need for West Springfield 3 (WSP3) for system reliability in the region. The unit has a rating of 101 MW (February 2005 Summer Seasonal Claimed Capability) and is located in the Western Massachusetts (WMA) Regional Transmission Expansion Plan (RTEP) Sub-area.

To respond to this request, System Planning has reviewed recent relevant ISO-NE studies regarding the impact of WSP3 on system reliability, and System Operations has performed an analysis of the need for West Springfield 3 for the next five years. This document provides the results of System Planning's review and System Operations analysis.

II. Summary of Findings

The West Springfield 3 unit is needed for transmission adequacy. It is used to prevent the overloading of the East Springfield to Breckwood (1322 circuit) 115 kV underground cable, which serves the Springfield area load. This cable is also essential to support the current level of import capability into Connecticut from Western Massachusetts that is necessary to meet reliability criteria. The System Operations analysis results indicate that without the West Springfield 3 unit, the 1322 circuit is expected to exceed its Long Time Emergency (LTE) rating 258 hours during 2005. This exceedence would be in violation of ISO New England Operating Procedure No. 19 – Transmission Operations. This violation could potentially be even greater if all planning and design contingencies were considered.

The West Springfield 3 unit is not needed to meet the New England loss of load expectation (LOLE) resource planning reliability criterion because, unlike Southwest Connecticut and Boston Sub-areas, the broadly defined WMA Sub-area does not have a well-defined transmission import constraint. That is, it was assumed that power could be imported into this area to meet LOLE requirements.

III. Reliability Studies

The following two documents, produced within the last two years, contain information that addresses the need for WSP3 for maintaining System Reliability.

1. "2004 Regional Transmission Expansion Plan Technical Report", October 21, 2004. ("RTEP04")

2. "West Springfield 3 Reliability Must Run Analysis", ISO-NE Transmission Operations, January 31, 2005

The results of each document are summarized below.

IV. RTEP04

The RTEP04 analyses include 1) a Loss of Load Expectation (LOLE) evaluation for the WMA Sub-area and 2) a status of the transmission planning studies for this area. The LOLE analysis examined the impact of a load increase for the broadly defined WMA Sub-area of up to 3,000 MW in 2005. The LOLE results (Appendix Table 6.32 of RTEP04) showed no violation of the 1 day in 10 years disconnection of non-interruptible loads criterion for New England (ISO New England Planning Procedure No. 3) for an increase of up to 2,800 MW. However, there really is no well-defined import interface for this area. This result shows that, given the modeling limitations, WSP3 is not needed for meeting the ISO New England resource planning reliability criterion.

Section 15 of the RTEP04 Report noted the growing potential for thermal and voltage reliability problems in the Springfield area. These potential problems depend on the load level; area power imports/exports necessary for reliability; a number of potential criteria-based contingencies, including a large number of 115 kV double circuit tower lines serving the area; and various combinations of generating unit availabilities. The report noted that a study is under way to examine these potential problems and develop comprehensive solutions.

Many of the reliability criteria problems are observed on the 115 kV ties connecting Ludlow to Springfield and are aggravated by stuck breaker or double circuit outages. All of these problems also tend to be further aggravated by the unavailability of the West Springfield 3 unit. The ongoing study suggests that considerable and widespread system modifications may be necessary in the Springfield area to address these reliability problems.

A large number and range of transmission system alternatives could potentially relieve the need for West Springfield 3. These include one or more of the following:

- a) Additional 345/115 kV transformation in the area
- b) Building new transmission circuits (overhead or underground) in the area
- c) Upgrading or replacing existing 115 kV underground cables
- d) Upgrading or rebuilding existing 115 kV overhead lines
- e) Additional capacitors at area substations for voltage support.

Until the study is completed, no sooner than the end of 2005, ISO-NE and Northeast Utilities cannot be specific about what alternative solves the Springfield area problems in the most effective manner.

V. West Springfield 3 Operations Reliability Must Run Analysis (WSP3 RMR)

The WSP3 RMR evaluation determined the hours each month for the next five years that WSP3 would be needed to maintain power flows within acceptable ratings in the Springfield area for applicable Operations contingencies. This was based on typical operations assumptions in which the largest generator in the area (Berkshire Power) is out of service and all transmission facilities are in service. The analysis calculated the number of hours that the forecasted load is expected to cause the LTE rating of the 1322 circuit to be exceeded. In the summer (April – October) this exceedence would occur above a system peak load of 21,700 MW and, similarly, in the winter (November – March), above 22,400 MW. The evaluation estimates that in 2005, WSP3 would be needed a total of 258 hours during June through December in order not to violate the reliability criteria set out in OP No. 19. In subsequent years, the number of hours increases that this unit would be needed, so, that by 2009, WSP3 would be needed a total of 440 hours. The description of the evaluation is attached. Note, that if all applicable planning and design contingencies are considered, these required hours would likely be even more than is estimated by this analysis.

West Springfield 3 Reliability Must Run Analysis

This analysis focuses on the resources needed to maintain reliability in the Springfield area. These resources include the capability of the area’s generation and transmission system. The area’s major generating units and nominal capability are West Springfield 3 – 100 MW, Mass Power – 240 MW, Berkshire Power – 245 MW, Mt. Tom – 145 MW. Other significant generation in the area is West Springfield 1 & 2 – 40 MW each, West Springfield 10 – 20 MW.

The area is interconnected through a 115 kV transmission system that cannot reliably support the entire load in the area, sometimes requiring generation in the area to run out of merit to maintain reliability. The facility that is exposed to overloads under most conditions is the 115 kV underground cable from East Springfield to Breckwood (1322 circuit).

The following assumptions were used in this analysis:

- West Springfield 3 shut down
- The largest remaining generating unit in the area (Berkshire Power) was assumed unavailable. All other units in the area were assumed available.
- All transmission facilities were assumed available.
- South Agawam reactors were modeled as inserted.
- Emergency actions such as splitting buses, opening the Western Mass. Ties, voltage reduction, load shedding, etc. were not used.
- Low voltage issues were ignored.
- Moderately stressed conditions were modeled as follows: NY to NE=1000 MW, SWCT Import =1500 MW, CT Import=2000 MW

Using the above assumptions, a loadflow analysis was performed to determine the load level above which the 1322 circuit would exceed the LTE rating for applicable operations contingencies. The following table indicates these load levels, using summer and winter ratings, and the number of hours that load is expected to exceed these levels according to RTEP05 load forecast. Under the same assumptions but with West Springfield 3 available, there were no overloads.

Number of Hours above the indicated load level

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
YEAR	22400	22400	22400	21700	21700	21700	21700	21700	21700	21700	22400	22400
2005	0	0	0	0	0	16	111	122	3	0	0	6
2006	2	0	0	0	0	23	127	131	9	0	0	11
2007	11	0	0	0	0	26	145	138	12	0	0	19
2008	15	0	0	0	0	29	154	151	15	0	0	26
2009	27	3	0	0	0	32	164	160	19	0	0	35

Date: April 27, 2005

GENERAL INFORMATION

- 1. Unit Name/ID: Berkshire Power Asset ID No. 1086
- 2. Owner: Berkshire Power, LLC
- 3. Area Transmission Owner: WMECO
- 4. Capacity MW Summer: 229.5 Winter: 246.5
- 5. Location: Town: Agawam State: Massachusetts
- 6. Substation Connection: Radial 115 kV into South Agawam S/S
- 7. RSP05 Planning Sub Area: WMA
- 8. Date of RMR Request: 3/24/05

NEED for Generating Unit

9. Is the unit needed to maintain New England System-wide Resource Adequacy (LOLE of 0.1 days per year) as required by NPCC A-2 and ISO-NE PP3?

Yes No: ✓

Reference: Table 6.14 (Attached) from RTEP04 Technical Report

10. Is the unit located in an Import-constrained sub-area?

Yes: No: ✓

If Yes, is there a resource deficiency with the unit deactivated or retired?

Yes: No:

11. Is the unit needed for capacity in the Planning Sub-area where it is located?

Yes: No: ✓

Reference: Figure 6.5 (Attached) from RTEP04 Technical Report

12. Is unit needed for local area transmission reliability support (ISO-NE PP3)?

Thermal	Voltage	Stability
---------	---------	-----------

Yes: ✓	Yes	Yes
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No:	No: ✓	No: ✓
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Reference: "West Springfield 3 Reliability Must Run Analysis", ISO-NE Transmission Operations, January 31, 2005

Discussion and Summary of Evaluation of Need: The referenced analysis shows that without Berkshire Power, and assuming W Springfield 3 is out of service, the East Springfield to Breckwood 115kV (1322) circuit would exceed the LTE rating during many hours in the year for operational contingencies. This would violate OP-19.

In summary, the Berkshire Power Unit is not needed to meet the New England system-wide Resource Adequacy criteria, but the Unit is needed for local area transmission reliability support.

From RTEP04 Technical Report

Table 6.14
Projected NEPOOL Installed Capacity Requirement (MW) and System LOLE (days/year)
at 2004 CELT Reference Load Forecast

Power Year ¹⁰	Summer Peak Load (MW)	NEPOOL Resources Claiming Capability ¹¹ (MW)	NEPOOL LOLE with all NEPOOL Capacity Resources	NEPOOL Installed Capacity Requirement ¹² (MW)
2004-05	25,735	33,710	0.0005	28,915
2005-06	26,305	33,710	0.0010	29,366
2006-07	26,570	33,710	0.0017	29,721
2007-08	26,815	33,710	0.0027	30,032
2008-09	27,058	33,710	0.0042	30,347
2009-10	27,390	33,710	0.0067	30,702
2010-11	27,740	33,710	0.0109	31,104
2011-12	28,170	33,710	0.0191	31,608
2012-13	28,550	33,710	0.0300	32,059
2013-14	28,880	33,710	0.0433	32,441

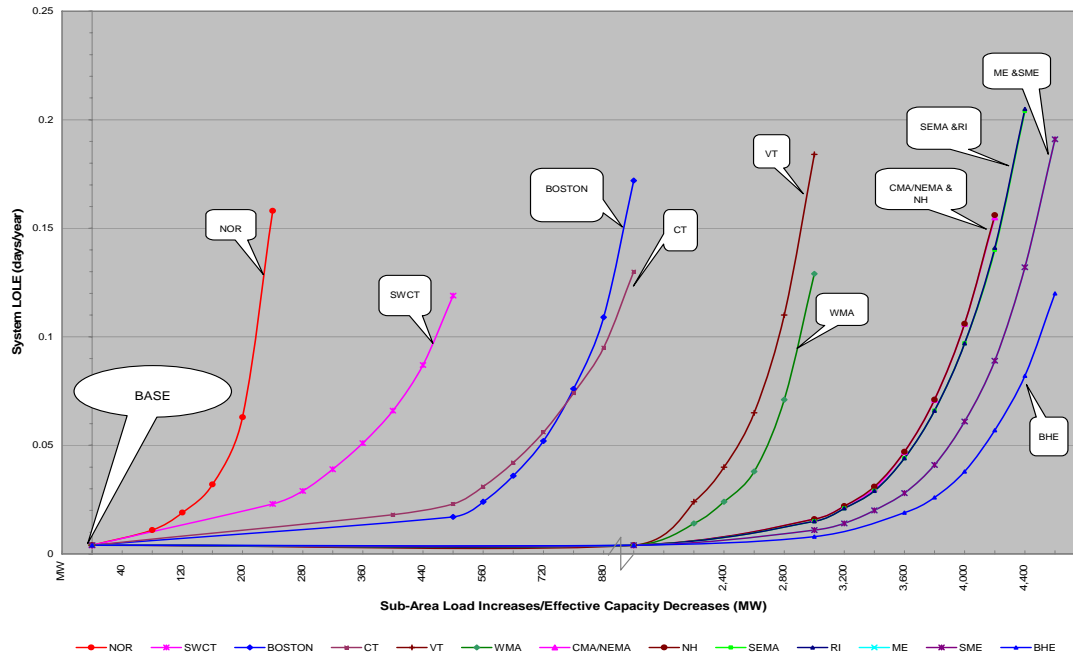
Figure 6.5

System LOLE per Change in RTEP Sub-area Load (MW) Year 2005

¹⁰ A Power Year is from June 1 of a Giving year through May 31 of the following year.

¹¹ NEPOOL resources claimed for capability is different than “Installed Capability/Capacity”. In addition to “Installed Capability/Capacity” (which are the Energy Management System generators), NEPOOL “Resources Claiming Capability” include Hydro-Quebec Installed Capability Credit, Demand Response Resources, and Settlement Only Resources. Therefore, the value is higher than the one used in the Operable Capacity Analysis.

¹² Based on meeting the 1 day in 10 years LOLE criterion.



Attachment

West Springfield 3 Reliability Must Run Analysis

This analysis focuses on the resources needed to maintain reliability in the Springfield area. These resources include the capability of the area's generation and transmission system. The area's major generating units and nominal capability are West Springfield 3 – 100 MW, Mass Power – 240 MW, Berkshire Power – 245 MW, Mt. Tom – 145 MW. Other significant generation in the area is West Springfield 1 & 2 – 40 MW each, West Springfield 10 – 20 MW.

The area is interconnected through a 115 kV transmission system that cannot reliably support the entire load in the area, sometimes requiring generation in the area to run out of merit to maintain reliability. The facility that is exposed to overloads under most conditions is the 115 kV underground cable from East Springfield to Breckwood (1322 circuit).

The following assumptions were used in this analysis:

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- The largest remaining generating unit in the area (Berkshire Power) was assumed unavailable. All other units in the area were assumed available.
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- South Agawam reactors were modeled as inserted.
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Using the above assumptions, a loadflow analysis was performed to determine the load level above which the 1322 circuit would exceed the LTE rating for applicable operations contingencies. The following table indicates these load levels, using summer and winter ratings, and the number of hours that load is expected to exceed these levels according to RTEP05 load forecast. Under the same assumptions but with West Springfield 3 available, there were no overloads.

Number of Hours above the indicated load level

YEAR	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
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2005	0	0	0	0	0	16	111	122	3	0	0	6
2006	2	0	0	0	0	23	127	131	9	0	0	11
2007	11	0	0	0	0	26	145	138	12	0	0	19
2008	15	0	0	0	0	29	154	151	15	0	0	26
2009	27	3	0	0	0	32	164	160	19	0	0	35

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 this proceeding.

Dated at Washington, D.C. this 21st day of October, 2005.

/s/

Lyndsey K. Sites
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202-661-7618