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October 12, 2006

VIA ELECTRONIC FILING

Honorable Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1A  
Washington, DC 20426

**RE: Preventing Undue Discrimination and Preference in Transmission Service  
Docket Nos. RM05-25-000 and RM05-17-000  
Technical Conference on October 12, 2006**

Dear Ms. Salas:

Pursuant to the Notice of Agenda and Procedures for Technical Conference in the above referenced rulemaking proceeding, enclosed for filing is an electronic copy of the prepared written statement of Michael J. Kormos, Senior Vice President for Reliability for PJM Interconnection, L.L.C.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Steve Pincus', written over a white background.

Steven R. Pincus  
Attorney for PJM Interconnection, L.L.C.



our “lessons learned” have helped to identify necessary elements to a planning process that is open, inclusive and ensures the development of needed new infrastructure. We believe these elements are applicable irrespective of whether an RTO has formed and are critical whether or not the planning entity also operates an organized market.

It has been nearly a decade since PJM’s regional planning process began. Over that time, the process has grown and evolved, all the while keeping in mind its goal of producing, through transparent processes, sufficient information to support the development of a robust electric transmission network. Two important features of PJM’s RTEP have been the subject of recent change: (i) extending the forward outlook of the process, and (ii) enhancing and expanding the scope of analysis to support transmission system upgrades needed to promote market efficiency.<sup>1</sup>

Arguably the most important outcome expected to result from these recent changes will be the significant volume of critical planning information that will be made publicly available. What will issue from this process will be data that not only informs PJM and its transmission owners in evaluating any future reliability or market efficiency needs of the system, but also informs transmission customers, generation developers and merchant transmission developers of opportunities they might pursue to address these needs in lieu of transmission development. PJM’s RTEP, coupled with recent Commission action to provide certainty as to accounting and cost-recovery for planning projects and the changes we are proposing in Docket No. ER06-1474-000, allows PJM flexibility to defer or even cancel previously identified transmission solutions should

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<sup>1</sup> This latter change is pending before the Commission in Docket No: ER06-1474.

alternatives, including generation or demand side, respond to the information generated by PJM's newly-enhanced RTEP process.

The first regional plan incorporating PJM's new 15-year planning horizon was approved by the PJM Board in June. PJM has authorized more than \$4 billion of transmission investment under the RTEP since the first plan was approved in 2000. Since that time, more than 18,700 megawatts of generation has been interconnected, with more than 3,700 MW of generation now under construction. Projects directed by PJM have without exception been accepted by the affected transmission owner and all such projects are on schedule as originally envisioned. In fact, more than \$500 million in transmission projects have been completed under RTEP.

The planning process has worked well to ensure timely upgrades to support new generation interconnections. In fact, in its early years the RTEP process was driven largely by interconnection projects and by upgrades to address reliability issues. In the spring of 2005, our planning took a new direction with the introduction by PJM of the *Mountaineer* concept. It focused on the idea of identifying major corridors for bulk transmission to move power from the Appalachian region, where significant new coal and wind resources were under development, to the load centers in eastern PJM. *Mountaineer* highlighted the importance of new backbone transmission infrastructure to address both reliability and economic-efficiency needs across the region. In combination with the Energy Policy Act of 2005 and its provisions related to National Interest Electric Transmission Corridors, it led to a more direct focus on the need for new backbone transmission in the PJM region.

This shift is reflected in the 15-year RTEP that was approved in June. It authorized the construction of \$1.3 billion in transmission upgrades by 2011, including a 240-mile, 500-kilovolt line to be built from southwestern Pennsylvania to Virginia by Allegheny Power and Dominion. In terms of longer term development of new backbone transmission infrastructure, the PJM board approved further study and evaluation of a total of 10 transmission-line proposals valued at about \$10 billion to address needs through 2021. These include backbone projects proposed by Allegheny Power, American Electric Power and Pepco Holdings. This Commission has already indicated its intention to grant incentive rate treatment for the AEP and Allegheny projects arising out of that RTEPP process.

The near-term projects are estimated to reduce congestion in PJM by \$200 million to \$300 million a year, while the longer-term proposals could reduce congestion by more than \$1 billion a year.

From first hand experience, PJM has seen the value of independence in conducting coordinated regional planning. The following points illustrate why PJM has concluded that effective coordinated regional planning must be administered by an independent entity:

- Effective regional planning requires full consideration of proprietary information from competitors, customers and suppliers that is best shared through an entity that is disinterested in any one participant's position.
- The process necessarily involves competing long and short term interests and the consideration of alternatives. Hard decisions and trade-offs must be made in order to ensure the most optimal planning decisions. Given the necessary exercise of judgment in this regard, it is difficult to envision how regional planning dependent on interested party consensus will succeed in overcoming parochial interests.

- The determinations and opinions that result from an inclusive, but independent, process are expected to carry particular weight in both state and federal regulatory approval and siting proceedings because these determinations and opinions can be viewed as free from potential compromise as otherwise would be the case if such conclusions issued from the interested applicant. PJM findings, for example, played a key role in the siting of the Oyster Creek to Cardiff line by the New Jersey Board of Public Utilities.

PJM is confident that the key elements of independence, transparency and openness which characterized the PJM process as revised are equally applicable to other non-RTO regions and can help to ensure the development of a robust transmission grid. I explain this more in response to the Commission's questions below.

## **II. RESPONSES TO COMMISSION'S QUESTIONS**

### **1. What is the appropriate geographic scope for an effective planning region or sub-region?**

Not unlike system operations, defining the most optimal scope of system planning is an exercise in understanding the topography of the interconnected transmission system, historical markets for supply resources and demand consumption, and historic power flows and trading patterns. State borders, corporate ownership and control area boundaries are institutional and regulatory constructs that typically do not correspond to the optimal geography to conduct system planning as defined from the perspective of the electrical interconnection and physics of the system. Indeed, the test of effective regional planning will be its ability to transcend vested parochial interests that arise in the first instance from traditional ownership and individual transmission owner service areas. As the Commission no doubt already appreciates, determining the size and scope needed to accomplish effective regional planning is not a matter of a blanket directive that sets

minimum size requirements in terms of installed capacity, transmission line mileage or simply square miles. An optimal planning area in one region may look very different from an optimal planning area in another. For this reason, we do not think that the Commission should focus on line drawing. It should ensure that the regional planning process it calls for is undertaken over a region larger than an individual transmission owner's service territory. It should ensure independence and transparency and it should require all neighboring planning entities to coordinate with one another. Through this "daisy chain effect," each independent entity coordinating with its bordering independent entity, the areas where synergies and coordination are needed will clearly rise to the surface. In short, rather than line drawing, the Commission should require independence, transparency and coordination among neighboring control areas with the directive that these independent entities need to reconcile competing plans and identify those places where cross-border coordination will ensure a more cost effective result.<sup>2</sup>

Indeed, the Commission has faced the question of size as regards to planning regions on at least two prior occasions. First, in 1993, FERC issued a policy statement recommending that transmission owners, transmission customers, and other interested parties form regional transmission groups (RTGs) to coordinate transmission planning and expansion on a regional and inter-regional basis. (*Policy Statement Regarding Regional Transmission Groups*, RM93-3-000, July 30, 1993). There the Commission stated:

"Coordinated planning" is a broad term that should encompass the goal of efficient use and expansion of the nation's transmission system. The term

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<sup>2</sup> Appropriate cost allocation can then ensure that these benefits are properly allocated among different beneficiaries of these improvements.

“efficient expansion” goes beyond planning needed for reliability purposes. It also includes planning to make expansions that are economically justified from a regional perspective. This component assures that the economic trade-offs between generation and transmission expansion will be weighed appropriately.

*Policy Statement*, p.18. The 1993 Policy Statement reflects not merely support for regionalism but also for inter or super-regional planning.

Another key aspect of coordinated planning, in our view, is that it addresses the needs not only of the region encompassed by the RTG, but also of the surrounding areas that have transmission assets that interact with those of the RTG. .RTGs should not only plan for efficient expansion within their own boundaries, but also should coordinate with one another to assure that bottlenecks do not develop on the boundaries between RTGs and the existing bottlenecks are appropriately eliminated.

*Policy Statement*, pps 18-19. In deliberating what size and scope is needed to ensure effective regional planning, the Commission should consider that the criticality of this question is significantly diminished if it also insists on rules to foster super-regional planning. Where some comfort can be had that planning regions will coordinate with each other, the proper size of the individual regions, while still important, becomes less critical.

The second occasion where the Commission gave close consideration to the question of proper size and scope of regional planning was in Order 2000. There it concluded that a RTO’s region must be of sufficient scope and configuration to perform effectively its required function and to support efficient and nondiscriminatory power markets. Of course, one critical function of an RTO under Order No. 2000 was coordinated planning. The following factors, excerpted from the nine criteria points enumerated by the Commission in the Order 2000 context, represent in PJM’s view,

guidance for coordinated regional planning size and scope determinations in the context of the instant NOPR:

- Encompasses one contiguous geographic area
- Encompasses a highly interconnected portion of the grid

**2. Are there specific criteria that can be developed to define the scope and frequency of the congestion studies proposed in the NOPR?**

The NOPR proposes that congestion studies should be required annually. It does not and should not however, define the scope of such congestion studies. Congestion studies needed for regional planning call for a comprehensive evaluation of options by an independent transmission planner through an open and transparent process – one that integrates generation, transmission and demand responsive resources as well as system operating protocols (such as redispatch) in identifying the system’s reliability and market efficiency needs.

Comprehensive regional planning is a dynamic process that, to be effective, must examine interrelated components of electric power systems to determine the best way to integrate transmission with generation and load response projects. This functional scope together with a sufficient regional scope enables a transmission planning entity to develop comprehensive, integrated expansion plans. This process considers a myriad of drivers which require transmission planners to utilize sophisticated analyses and modeling to examine these drivers on an ongoing basis. An economic transmission expansion planning process of sufficient regional scale (see discussion above) requires flexibility which allows the planner to change course as congestion studies are evaluated and revaluated as underlying assumptions change. Thus, PJM believes that the assumptions and methodologies needed to perform the congestion studies should not be

prescribed. Rather, those assumptions and methodologies need to be set forth as guide lines which give planners sufficient latitude and allow for change, evolution and ongoing adjustments. Given the forward nature of planning, change and the flexibility to respond to change must be accepted as a given.

Rather than prescribing every detail of the contents of congestion studies, the Commission should ensure that the process provides sufficient transparency and is open to allow market participants and other interested stakeholders to participate actively in the planning process in order to understand and challenge the underlying cost benefit analyses used by the planner to initially develop and subsequently modify transmission expansion plans. For instance, PJM's market efficiency filing proposes a process which expands the role of stakeholders in the committee process. Under this proposal, PJM's Transmission Expansion Advisory Committee ("TEAC") has been expanded to play a significant role in PJM's analysis of the future market efficiency needs of the system. The TEAC will review and provide input regarding the assumption included in the economic efficiency analysis when it is initiated. Moreover, PJM will review with the TEAC the congested areas to be studied, as well as potential transmission solutions and their ability to mitigate future congestion. Thus, the TEAC will serve as a vehicle for consideration for alternate scenarios on the study process, including alternative generation, demand side response, and transmission scenarios, as well as other sensitivity analyses. The expanded role of the TEAC provides PJM stakeholders with an enhanced opportunity to participate in the transmission expansion planning process and improves transparency and fosters open collaborative regional transmission planning.

PJM agrees with the Commission's proposal to require transmission providers to perform congestion studies on an annual basis but cautions that the Commission should not be overly prescriptive in this area. PJM believes that, along with annual studies, transmission providers should perform the necessary studies to identify transmission enhancements or expansions that will relieve transmission constraints on an ongoing basis. There should be a common definition of what constitutes congestion on the grid and methods to measure it. There should be recognition of the need to address solutions through both transmission upgrades as well as generation and demand side solutions. The regular evaluation of potential economic-based transmission enhancements and the increased ability of market participants to propose alternative solutions will create more opportunities for inclusion of economic-based enhancements in the planning process and allow transmission planners to address transmission congestion.

**3. Is an independent consultant necessary to facilitate planning?**

**and**

**4. What are some effective mechanisms for safeguarding confidentiality while permitting meaningful access to transmission information?**

In PJM's view, the more open and inclusive the planning process, the more critical the need for an independent agent to evaluate and balance diverse and often competing interests. Additionally, independence that does not arm the independent planning administrator with legal or strong persuasive authority to direct a participant to develop the most optimal planning outcome will not fully meet the open access objectives sought by this rulemaking.

Independence in planning serves a number of essential purposes. For instance, an independent body performing analysis can ensure that those analyses truly test reliability

criteria, as written, and that liberties are not taken to accommodate other agenda, including proprietary interests of the non-independent transmission providers or their affiliates. On another level, an independent entity must ensure the comparability of analyses and objectivity in the choice of solutions. The same issues apply with respect to performing various coordinating analyses. Regional planning processes must be overseen and coordinated by independent planners free from financial interests in any market participant or jurisdiction. Independent planning entities are needed to make difficult choices when stakeholders' interests are too diverse to permit them to reach a consensus. The end result is a plan that is best for the region as a whole, rather than on what is best for any market participant's business interests.

Another purpose served by independent planning is in the difficult siting process that follows the identification of needed transmission projects. PJM believes that independent, open and transparent planning processes will lend more credibility and expedite the project approvals in federal, state and local siting proceedings than transmission projects directed by closed non-independent planners.

Thus, truly independent transmission planners, such as federally regulated RTOs, act independently and impartially in managing and planning the expansion of the regional transmission system. The rigors and levels of independence that characterize the PJM process ensure the integrity of the planning outcome and should serve as a model for the Commission to consider in the context of this rulemaking.

Question 4 addressing the need to maintain as confidential information that might be sensitive from either a market or security perspective illustrates yet another essential purpose served by planning administered by an independent entity. A financially

disinterested third-party planning administrator will be able to collect and safeguard confidential and sensitive information gathered from market participants in the planning process without violating nondisclosure or code of conduct limitations. Once the independent planning entity compiles this information in the planning process it may then be published in planning reports in aggregate form without violating nondisclosure obligations. For instance under the PJM Operating Agreement, PJM has access to individual member confidential information and may disclose it in aggregate form. Thus, the need to access, gather and safeguard confidential information further supports the conclusion that an independent planner is needed to coordinate and oversee the planning process. Certain information critical to an informed planning process must be kept confidential. In the absence of an independent clearinghouse to consider this information, PJM doubts coordinated regional planning can be as complete or effective.

**5. How should the planning obligation be coordinated with state processes?**

PJM recognizes that the states are key participants in the regional planning process. As an RTO, PJM has ultimate responsibility for transmission planning and expansion at a regional level. Yet the results of PJM's transmission planning process have a significant impact on state interests. These impacts include costs borne by the ratepayers in the state, services to state residents, siting proceedings and other areas that fall under the jurisdiction of state regulators and agencies.

Transmission projects identified as a result of the RTO planning process likely will depend on the state commission's ultimate siting authority before the project proposals can be realized. Further the interstate and regional nature of electric supply markets means that state siting and permitting authorities may increasingly be asked to

approve transmission upgrades or lines that serve regional and not necessarily local needs. States will be increasingly obliged to recognize and incorporate such regional impacts in their certification and review processes. States may also be challenged to develop criteria and practices for need certification that reflect the interdependent, and interstate, nature of today's electric systems. As such, providing the states an opportunity to participate in the regional planning process early on is critical to an effective process.

The FERC process should respect state public policy objectives in the regional planning process. For example, critical public policy interests in areas such as demand side response and renewable resources originate within state jurisdiction. There should be a forum to enable the states to share information regarding their key initiatives and facilitate the use of these initiatives in the planning process. Ultimately the level and form of state participation should be at the option of each state, but clarifying the input and authorities available to the states is important.

The regional planning process should be open to the states. In PJM, daily activities are shared with states through the Organization of PJM States (“OPSI”) which conducts regular meetings and routinely coordinates with representatives of each of the thirteen PJM states’ public service commissions, as well as the District of Columbia PSC, regarding relevant issues and developments within the PJM region. FERC can further this concept through the continued use of open forums and technical meetings rather than the more litigious approach to the regional planning submittals which seems to have arisen. Also, states should provide the regional planning entity with information regarding state jurisdiction, state initiatives, and state transmission planning guidelines and procedures, preferably as part of inclusive process administered by the planning entity.

In short, the state's roles and jurisdiction in the planning function and in assisting the execution of the regional plan should be recognized as a key input to the process. The process directed by the Commission should accommodate an information exchange and review of regional planning proposals by the states, in recognition of initiatives the state may have underway, such as renewable portfolio requirements or demand side response programs, that might impact the planning decision-making.

**6. If an open season requirement is added for large new transmission projects, what conditions or limitations should be associated with it?**

An open transparent and independent planning process effectively serves as an "open season" allowing any entity to propose projects and innovative solutions that may address issues beyond any one transmission owners. As a result, many of the issue associated with ordering an open season can be addressed, in the first instance, by ensuring a transparent and independent planning process that can evaluate the best solution over a very large footprint rather than with just the pecuniary interests of one transmission provider in mind.

However, if the Commission addresses the legal issues associated with going beyond this requirement to instead require joint ownership of projects, PJM wishes to point out certain practical and serious implementation problems that the Commission should consider in its deliberations.

In the PJM case, RTEP provides PJM effective contractual authority to designate and direct an entity to build new transmission. Grafting onto the RTEP process an open season requirement could create practical problems in the exercise of that authority. An effective planning entity should have authority (by contract or otherwise) to direct a

transmission owner to develop a needed project. This authority will be compromised if there is any confusion as to the entity “obligated to build” as would seemingly occur by institution of an open season designed to mandate joint ownership.

Also, in many regions there is a large diversity among the potential project owners as well as differences between individual states’ siting and permitting regulations. An open season bidding process invites multiple owners and financiers to bid for ownership in a single project. Each bidder comes with their own and differing approach to financing, engineering, design, construction practices, contracting practices, siting, right-of-way acquisition, ratemaking and other matters. There are no simple approaches to enable the evaluation of each bidder in a fair manner. Participants could expect delay and disputes over the negotiation of complex contractual arrangements, disputes over eligibility for participation, and disputes over joint ownership arrangements. Such delays could stall new transmission construction, which is not desirable since large scale transmission projects already are hampered by long lead times.

The Commission would likely be the ultimate arbiter over joint ownership related disputes and the Commission would need to first determine fair and objective criteria to gauge eligibility for participation in a project. Here again participants might be inclined to dispute Commission decisions concerning winners and losers and further delay of progress would result.

Siting considerations within the individual states further complicate an open season requirement and limit the opportunity for participants to apply for a joint ownership arrangement. States have varying requirements for the permitting and siting of transmission projects within state boundaries. These differing requirements may limit

eligibility to obtain permits and eminent domain authority to public utilities doing business within the state, potentially thwarting joint ownership by establishing barriers in state law that not all potential transmission line owners can overcome.<sup>3</sup> These limitations will affect the ability to conduct a meaningful open season. Potential participants in the open season may not be well positioned to bid because of the uncertainties and limitations caused by varying laws and state commission processes. State regulations could result in only one or two participants bidding in an open season and this type of result would not adequately reflect the viability of a project.

Mandating joint ownership may prove counterproductive to the first order goal of investment in large new transmission projects. Adding ownership questions to the already complex planning process will complicate and most likely result in project delay and confusion among the participant bidders. Also, an open season is not likely to bring FERC closer to the goal of gauging interest in a project or encouraging new project development. Moreover, mandatory open season may produce the unintended consequence of delaying or even preventing projects that would otherwise be built under a contractual obligation to build such as the obligation to build under PJM's Operating Agreement and Transmission Owners Agreement.

7. **Can the proposed regional planning requirements achieve its goals if the participants in the regional planning process have not achieved agreement among themselves on appropriate cost-allocation issues? If not, what can be done to encourage the development of such cost allocation agreements among regional planning participants?**

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<sup>3</sup> See, e.g. Md. Code Ann., Pub. Util. Cos. § 1-101(h) (2006) (Code defining an "electric company" as a person who "physically transmits or distributes electricity in the State to a retail electric customer"); KRS 278.020 and 807 KAR5:001 (Kentucky siting regulations noting that applicant must be a public utility within the state of Kentucky).

A methodology for allocating costs to customers of new facilities built under regional transmission planning processes is essential to achieve the goals of regional planning. PJM believes, however, that it is unrealistic to expect market participants in large diversified regions of a scope required to achieve optimal transmission planning (see discussion above) to reach consensus on the essential aspect of transmission planning, the cost allocation methodology.

Within PJM's region, for example, the Commission has issued orders setting for hearing market participant disputes over PJM's recommended allocation of cost responsibility for transmission upgrades included in the PJM's Regional Transmission Expansion Plan required under the PJM Operating Agreement. Because of the diverse and competing financial interests of PJM's market participants, consensus on the cost allocation methodologies and the application of those methodologies could not be achieved.

This problem is also seen, perhaps to a greater extent, in efforts by PJM and the Midwest ISO to develop a methodology for allocating to their respective customers the cost of new facilities built in one RTO to provide benefits to customers in the other RTO. In that proceeding, the RTOs were unable to reach consensus on how to apply the methodology to determine the impact of flows in one RTO on a constraint in the other RTO. Thus, the RTOs and their respective transmission owners filed their own proposals. There, the Commission set the issue for resolution through a technical conference. While those issues apply only to reliability upgrades, it is essential for the Commission to resolve those questions before stakeholders will be able to move forward on the more difficult questions needed to adopt cost allocation methodology for cross

border economic upgrades which are built in one RTO but provide economic benefits to customers in the other RTO.

If the Commission directs socialization of transmission expansion or upgrade costs, then it should specify at what voltage level the cost socialization will occur. If the Commission directs the allocation costs based on who benefits from transmission expansions or upgrades then, the Commission must provide guidance to transmission planners and market participants on the basic cost allocation methodologies. Regional solutions are always preferable but at least in the PJM region, such regional solutions have not been reached as evidenced by the myriad of litigation over this issue. Without overarching Commission guidance, the Commission will be faced with the undesirable situation in which it will be required to make judgments case by case in repetitive litigation over market participant disputes. Any challenges for Commission determination should be limited to the details of the *application* of cost allocation methodologies. The Commission would then ensure an orderly process for identification and litigation of issues and avoid the same issue being litigated in multiple proceedings. Of course this cannot be achieved if the judgment is left with a transmission planner that is not independent and is biased in favor of itself or its affiliates who are market participants with a stake in the outcome of the cost allocations.

#### **8. What Is The Appropriate Role For Demand Response In Planning?**

Demand response resources have potential to impact planning outcomes significantly. Presently, such resources have been used increasingly in PJM to address real time operating needs with good results. PJM believes such resources can also play an important role in regional planning provided the planning process is sufficiently

transparent. The ability, however, to translate a demand side resource as a tool for the system operator into an option for the system planner requires consideration of a several points.

First, it is relevant whether the planning issue seeking resolution is one to address a reliability criteria violation or one to improve the economic efficiency of the system. Understandably, the latitude and room for error that a planning authority has in the context of reliability is considerably less than when congestion is at issue. Reliance on a demand side resource to meet a reliability need on the system may be difficult, given the uncertain character of most current demand side resources, as explained below.

Second, planning is by its nature a forward looking exercise. In order for demand side resources to be considered on par with infrastructure, a firm contractual commitment made today to be available as a demand side resource five or more years into the future must be considered. Given the potential economic and reliability consequences that might result from a breach of that obligation, the contract would need to include potentially large liquidated damages provisions. To the extent securitizing this exposure is deemed necessary, the immediate cost of the resource could prove prohibitive.

Third, many demand side programs today turn on voluntary curtailment in real time in return for a payment reflecting the real time value the curtailment provides the system operator. In PJM's experience, the system operator can only rely on a certain percentage of registered demand response customers to voluntarily curtail when the offer is put to them. It is difficult to envision anything but a mandatory curtailment commitment as practicable when thinking of demand side resources as a planning tool to substitute for infrastructure investment.

In the final analysis, PJM believes demand side resources should be considered in the planning analysis, but considered carefully and with a hard eye to system requirements taking into proper account the dependability and reliability of the demand side resource.

### **III. CONCLUSION**

Thank you for allowing me, on behalf of PJM, the opportunity both to participate in the Commission's technical conference and provide these supporting comments.

Respectfully submitted,



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October 12, 2006