

134 FERC ¶ 61,169
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;
Marc Spitzer, Philip D. Moeller,
John R. Norris, and Cheryl A. LaFleur.

WSPP Inc.

Docket No. ER10-2295-000

ORDER ON SERVICE SCHEDULES D AND E

(Issued March 4, 2011)

1. On August 23, 2010, WSPP Inc. (WSPP) submitted two new service schedules, Service Schedule D and Service Schedule E, for incorporation into the WSPP Agreement. In this order, for the reasons discussed below, the Commission rejects those proposed schedules.

I. Background

2. The WSPP Agreement was initially accepted by the Commission on a non-experimental basis in 1991,¹ and provided for flexible pricing for coordination sales and transmission services. The WSPP Agreement as it exists today permits sellers of electric energy to charge either an uncapped market-based rate (for public utility sellers, they must have obtained separate market-based rate authorization from the Commission to do this), or an “up to” cost-based ceiling rate. Currently, there are over 300 parties to the WSPP Agreement located throughout the United States and Canada, including private, public and governmental entities, financial institutions and aggregators, and wholesale and retail customers.

¹ *Western Sys. Power Pool*, 55 FERC ¶ 61,099, *order on reh’g*, 55 FERC ¶ 61,495 (1992) (Initial Order), *aff’d in relevant part and remanded in part sub nom. Environmental Action and Consumer Federation of America v. FERC*, 996 F.2d 401 (D.C. Cir. 1992), *order on remand*, 66 FERC ¶ 61,201 (1994). Prior to 1991, the WSPP Agreement was used for three years on an experimental basis. *See Pacific Gas & Electric Co.*, 50 FERC ¶ 61,339 (1990) (extending the initial two-year period for an additional year).

3. The WSPP Agreement currently includes three Commission-approved service schedules: economy energy service (Service Schedule A), unit commitment service (Service Schedule B), and sale or exchange of firm energy or capacity (Service Schedule C).

II. Description of Filing

4. On August 23, 2010, WSPP submitted proposed Service Schedules D and E for incorporation into the WSPP Agreement and related conforming changes to the main body of the WSPP Agreement. WSPP proposes an effective date of November 1, 2010, for these proposed service schedules and related conforming changes to the WSPP Agreement.

5. Under WSPP's proposed Service Schedule D, WSPP members would be permitted to sell reserve services at market-based rates, so long as such sellers already have market-based rate authority. The following five reserve services could be purchased under proposed Service Schedule D: (1) spinning reserve; (2) non-spinning reserve; (3) operating reserve-spinning; (4) operating reserve-supplemental; and (5) regulating reserve.

6. In order to implement proposed Service Schedule D, WSPP requests that the Commission waive the following restrictions adopted in *Avista*:² (1) the prohibition on selling ancillary services at market-based rates by a third-party supplier to a Regional Transmission Organization/Independent System Operator (RTO/ISO) that has no ability to self-supply ancillary services but instead depends on procurement from third parties; and (2) the prohibition on selling ancillary services at market-based rates by a third-party supplier to satisfy the purchasing utility's own Open-Access Transmission Tariff (OATT) requirements to offer ancillary services to its customers (*Avista* restrictions). WSPP contends that RTOs/ISOs can assure just and reasonable rates by procuring ancillary services through competitive requests for proposals. It submits that this procedure inherently assures competitive rates and negates any need to stifle competition by requiring sales to RTO/ISOs under Service Schedule D at cost-based rates. WSPP states that RTO/ISO market monitors are fully capable of identifying and mitigating any exercises of market power. With regard to the prohibition on sales by a third-party supplier to satisfy the purchasing utility's own OATT requirements to offer ancillary services to its customers, WSPP explains that the Commission has previously waived this prohibition on a case-by-case basis, allowing market-based rates for such sales when the utility has divested its generation and procures the necessary ancillary services from third parties pursuant to a competitive request for proposals. WSPP argues that the

² *Avista Corp.*, 87 FERC ¶ 61,223 (*Avista*), *order on reh'g*, 89 FERC ¶ 61,136 (1999) (*Avista* Rehearing Order).

Commission should eliminate the restriction on these sales entirely because purchasing utilities have inherent and adequate incentive to conduct their purchases prudently, including arranging for competitive supply through competitive procurement.

7. WSPP also requests that the Commission eliminate the requirement of either a market power study or a showing that such a study is infeasible in order to foster transactions under proposed Service Schedule D. WSPP argues that: (1) an entity's market power study for market-based rate energy sales is a reasonable proxy for an assessment of market power with respect to reserves sales; (2) balancing authorities seeking to procure reserves from external sources are unlikely to face exercises of market power because the anticipated addition of new suppliers of reserves at market prices is expected to add competition and reduce any existing market power; and (3) reserves sales at market-based rates would be made in addition to reserves sales by transmission providers under their OATT at cost-based rates.

8. WSPP further requests that, with respect to transactions under proposed Service Schedule D, the Commission waive the requirement of a separate description of reserve services in a jurisdictional utility's market-based rate tariff. According to WSPP, proposed Service Schedule D fully and efficiently satisfies the Commission's policy that third-party suppliers of ancillary services must have a specific tariff that identifies the ancillary services that they offer.

9. WSPP's proposed Service Schedule E would allow parties to sell intra-hour supplemental power service at market-based rates with either manual or dynamic dispatch options. WSPP explains that dynamic service does not use scheduling intervals, while for manually scheduled service each hour is divided into equal intervals as specified in the confirmation of the transaction between the parties. WSPP argues that intra-hour supplemental power service under proposed Service Schedule E does not appear to be an ancillary service. According to WSPP, the product is not intended to provide frequency regulation: the manually scheduled product does not have a sufficiently prompt response to provide frequency regulation, and although the dynamically scheduled product could serve that function, it is intended as a load following/generation leveling product (i.e., a balancing product). WSPP states that in centralized markets, balancing of generation with load under normal conditions is provided by the intra-hour workings of the real-time energy market, and is not considered an ancillary service. WSPP argues that there is no reason why an analogous product in a bilateral market (service under proposed Service Schedule E) should be treated differently.

III. Request for Additional Information and WSPP Response

10. On October 26, 2010, the Director, Division of Electric Power Regulation – West, issued a letter order requesting WSPP to submit additional information within 30 days of the date of the letter. On November 22, 2010, WSPP filed a motion for an extension of

time until December 10, 2010 to submit a response to the October 26, 2010 letter order requesting additional information. On December 10, 2010, WSPP submitted a response to the October 26, 2010 letter order (December 10th Response). On January 6, 2011, WSPP re-submitted Attachments C – F of the December 10th Response due to fact that the previously submitted electronic file was corrupted.

11. In its December 10th Response, WSPP argues that the *Avista* restrictions impede the development of ancillary service markets. Specifically, WSPP argues that in practical effect, the *Avista* restrictions require a seller to determine the purchaser and purpose of the sale, and, unless assurances against resale of the product are sought and obtained, the seller must either determine the nature of any resale customer or simply prohibit resale of the product. WSPP argues that these requirements require trust about how capacity/energy would be used, impose administrative burdens, diminish liquidity, and thereby diminish interest in obtaining market-based rate authorization for ancillary services sales. WSPP argues that the adoption of proposed Service Schedule D would address these barriers by allowing and encouraging the development of an open market for ancillary services.

12. WSPP contends that because RTO/ISO markets have greater access to data and larger staffs, market power studies are feasible in RTO/ISO regions. However, WSPP argues that such studies are infeasible in non-RTO regions because they lack the necessary regional institution to perform such studies and bear the associated costs.

13. WSPP argues that allowing market-based sales of ancillary services in markets where transmission providers can, and do, offer the service at cost-based rates under their OATTs can be expected to yield reduced prices for the service. According to WSPP, a purchaser would have no reason to buy supplemental reserve service at a rate higher than the cost-based rate offered by the transmission provider, and a transmission provider would have no reason to buy reserves at prices that exceed its cost of self supply.

14. WSPP further argues that increases in variable energy resources on the systems of public utilities indicate the increasing significance of ancillary services and a growing need for reserves. WSPP suggests that a more functional ancillary services market, including WSPP sales, would improve options for these services and possibly foster additional variable generation supply because these generators could be more effectively integrated into the bulk power system. WSPP claims that under the current structure, the market is not likely to foster sales of additional reserves by third parties. WSPP asserts that proposed Service Schedule D, on the other hand, would facilitate a transmission provider's provision of that service.

15. WSPP further explains that demand for reserve services throughout the Western Electricity Coordinating Council (WECC) has increased, primarily due to increases in load and increases in variable energy resources. WSPP notes that WECC loads have increased materially since 1999 and variable energy resources comprise an increasing

percentage of new generating capacity being brought on-line. WSPP argues that adoption of its proposed Service Schedule D will better enable the wholesale power market to serve this increased demand.

16. WSPP also contends that there are now more sellers capable of selling ancillary services than in 1999 due to the new generating capacity added in the WECC over the last 10 years. Finally, WSPP asserts that it expects that adoption of proposed Service Schedule D would improve the reliability of the bulk power system in the WECC.

IV. Notice of Filings and Responsive Pleadings

17. Notice of WSPP's August 23, 2010 filing was published in the *Federal Register*, 75 Fed. Reg. 53,293 (2010), with interventions and protests due on or before September 13, 2010. Xcel Energy Services Inc., the Cities of Santa Clara, California and Redding, California and the M-S-R Public Power Agency, and the Arizona Public Service Company filed timely motions to intervene. Notice of WSPP's December 10th Response was published in the *Federal Register*, 76 Fed. Reg. 2362 (2011), with interventions and protests due on or before January 3, 2011. None was filed. Notice of WSPP's January 6, 2011 filing was published in the *Federal Register*, 76 Fed. Reg. 2897 (2011), with interventions and protests due on or before January 27, 2011. None was filed.

V. Discussion

A. Procedural Matters

18. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedures, 18 C.F.R. § 385.214 (2010), the timely, unopposed motions to intervene of Xcel Energy Services Inc., the Cities of Santa Clara, California and Redding, California, the M-S-R Public Power Agency, and the Arizona Public Service Company serve to make them parties to this proceeding.

B. Analysis

19. In Order No. 888, the Commission required transmission providers to offer certain ancillary services at cost-based rates as part of their open access commitment but also contemplated that third parties (parties other than the transmission provider in a particular transaction) could provide certain ancillary services.³ The Commission also left open the

³ See *Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities*, Order No. 888, FERC Stats. & Regs. ¶ 31,036, at 31,720-21 (1996), *order on reh'g*, Order No. 888-A, FERC Stats. & Regs. ¶ 31,048,

(continued)

door for ancillary services to be provided on other than a cost-of-service basis. The Commission stated that it would entertain requests for market-based pricing related to ancillary services on a case-by-case basis if supported by analyses that demonstrate that the seller lacks market power in these discrete services.⁴

20. In *Ocean Vista Power Generation, L.L.C.*,⁵ the Commission explained that, as a general matter, a study of ancillary service markets should address the nature and characteristics of each ancillary service, as well as the nature and characteristics of generation capable of supplying each service, and that the study should develop market shares for each service. In particular, the Commission stated that an individual seller's market power analysis for ancillary services markets should: (1) define the relevant product market for each ancillary service; (2) identify the relevant geographic market, which could include all potential sellers of the product from whom the buyer could obtain the service, taking into account relevant factors which may include the other sellers' locations, the physical capability of the delivery system and the cost of such delivery, and important technical characteristics of the sellers' facilities; (3) establish market shares for all suppliers of the ancillary services in the relevant geographic markets; and (4) examine other barriers to entry. The Commission also noted that it would entertain alternative explanations and approaches.

21. In *Avista*, the Commission adopted a policy allowing third-party ancillary service providers that could not perform a market power study to sell certain ancillary services at market-based rates.⁶ However, the Commission prohibited sales of ancillary services at market-based rates by a third-party supplier in the following situations: (1) sales to an RTO or an ISO, i.e., where that entity has no ability to self-supply ancillary services but instead depends on third parties; (2) to address affiliate abuse concerns, sales to a traditional, franchised public utility affiliated with the third-party supplier, or sales where

order on reh'g, Order No. 888-B, 81 FERC ¶ 61,248 (1997), *order on reh'g*, Order No. 888-C, 82 FERC ¶ 61,046 (1998), *aff'd in relevant part sub nom. Transmission Access Policy Study Group v. FERC*, 225 F.3d 667 (D.C. Cir. 2000), *aff'd sub nom. New York v. FERC*, 535 U.S. 1 (2002).

⁴ *Id.*; See Order No. 888-A, FERC Stats. & Regs. ¶ 31,048 at 30,237-38.

⁵ 82 FERC ¶ 61,114 at 61,406-07 (1998).

⁶ The authorization in *Avista* extended to the following four ancillary services: Regulation Service, Energy Imbalance Service, Spinning Reserves, and Supplemental Reserves.

the underlying transmission service is on the system of the public utility affiliated with the third-party supplier; and (3) sales to a public utility that is purchasing ancillary services to satisfy its own open access tariff requirements to offer ancillary services to its own customers.⁷ The Commission further stated that it was open to considering requests to make ancillary services sales at market-based rates in such circumstances on a case-by-case basis.⁸

22. In the *Avista* Rehearing Order, the Commission clarified that although *Avista* prohibits third-party ancillary services suppliers from selling to transmission providers in order for transmission providers to meet their own ancillary service requirements, a transmission provider could purchase from a third-party supplier to permit it to offer third-party ancillary services off of its system.⁹ The Commission explained: “We are able to grant blanket authority for flexible pricing only because the price charged by the third-party supplier is disciplined by the obligation of the transmission provider to offer these services under cost-based rates. This discipline could be thwarted if the transmission provider could substitute purchases under non-cost-based rates for its

⁷ *Avista*, 87 FERC ¶ 61,223 at n.12.

⁸ *Id.* The Commission has granted waiver of the *Avista* restrictions on a case-by-case basis. See, e.g., *NorthWestern Corp. and Powerex Corp.*, 121 FERC ¶ 61,204 (2007) (granting Powerex limited waiver of the prohibition against making sales of ancillary services at market-based rates to public utilities that are purchasing such services to satisfy their own OATT requirements to offer ancillary services to their customers and accepting an agreement between NorthWestern and Powerex following a competitive solicitation under which Powerex will sell regulating reserve services to NorthWestern at market-based rates for a one-year period); *Powerex Corp.*, 125 FERC ¶ 61,179 (2008) (granting Powerex limited waiver of the prohibition from making sales of ancillary services at market-based rates to public utilities that are purchasing such services to satisfy their own OATT requirements to offer ancillary services to their customers and conditionally accepting an agreement between NorthWestern and Powerex following a competitive solicitation under which Powerex will sell regulating reserve services to NorthWestern at market-based rates over a two-year period, subject to extension for an additional year); *NorthWestern Corp.*, 125 FERC ¶ 61,178 (2008) (accepting an agreement between NorthWestern and Public Utility District No. 2 of Grant County, Washington, following a competitive solicitation under which Grant County will sell regulating reserve services to NorthWestern at market-based rates over a two-year period, subject to extension).

⁹ *Avista* Rehearing Order, 89 FERC at 61,391.

mandatory service obligation.”¹⁰ The Commission concluded that the protection of the “backstop of cost-based ancillary services from the transmission provider will provide an appropriate and effective safeguard against potential anti-competitive behavior.”¹¹

23. Although WSPP requests waiver of the prohibition on selling ancillary services at market-based rates to an RTO/ISO that has no ability to self-supply ancillary services, we note that sellers with market-based rate authority already are afforded the opportunity to sell certain ancillary services at market-based rates in markets where RTOs/ISOs have performed market power analyses to demonstrate whether certain ancillary services are competitive.¹² In *Avista*, although the Commission stated that the policy announced in that case would not apply to sales to an RTO “*i.e.*, where the RTO has no ability to self-supply ancillary services but instead depends on third parties,” the Commission at that time explained: “our experience to date indicates that the data problems associated with market analysis involving sales to an ISO, for example, should not be insurmountable and an appropriate showing of a lack of market power can be made.”¹³ Since *Avista*, numerous RTOs/ISOs have performed market power analyses demonstrating a lack of market power for certain ancillary services, and the Commission has approved the sale of certain ancillary services at market-based rates. Therefore, to the extent that WSPP requests waiver of such prohibition so that sellers under the WSPP Agreement can make sales of the ancillary services proposed in Service Schedule D at market-based rates to an RTO/ISO, sellers under the WSPP Agreement with market-based rate authority are already afforded the opportunity to do so in those RTOs/ISOs in which the Commission has approved the sale of those ancillary services at market-based rates.¹⁴

¹⁰ *Id.*

¹¹ *Avista*, 87 FERC at 61,883.

¹² See *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, FERC Stats. & Regs. ¶ 31,252, at n.1194, *clarified*, 121 FERC ¶ 61,260 (2007), *order on reh’g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268, *clarified*, 124 FERC ¶ 61,055, *order on reh’g*, Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 (2008), *order on reh’g*, Order No. 697-C, FERC Stats. & Regs. ¶ 31,291 (2009), *order on reh’g*, Order No. 697-D, FERC Stats. & Regs. ¶ 31,305 (2010).

¹³ *Avista*, 87 FERC ¶ 61,223 at n.12.

¹⁴ California Independent System Operator Corporation: Regulation, Spinning Reserve, and Non-Spinning Reserve; ISO New England, Inc.: Regulation and

24. With respect to WSPP's request for waiver of the prohibition on sales by a third-party supplier to satisfy the purchasing utility's own OATT requirements to offer ancillary services to its customers, we deny this request for the following reasons. First, we note that WSPP did not submit a market power study or sufficiently demonstrate why such a study would be infeasible. Instead, WSPP asserts, without providing any record evidence, that there would be a competitive market for ancillary services. Granting WSPP's request effectively would allow all sellers transacting under the WSPP Agreement, including entities offering ancillary services outside the WECC, to sell reserve services at market-based rates without any market power study being performed.¹⁵ While the Commission wishes to foster entry into ancillary service markets, we also must guard against potential anticompetitive behavior by third-party suppliers who may have market power. We cannot simply assume that no anticompetitive behavior would occur were we to grant WSPP's request.

25. Second, we disagree with WSPP's assertion that an entity's market power study for market-based rate energy sales is a reasonable proxy for an assessment of their market power with respect to reserve sales. None of the five reserve services identified in WSPP's proposed Service Schedule D are the same product as energy; instead, they are distinct products with demand and supply characteristics that differ from those in the energy market. Moreover, while all operational generating units can supply energy, only certain generating units can supply particular reserve services. A market or balancing authority area that has many potential suppliers of energy may have a much smaller number of suppliers for certain reserve services. This is why the Commission requires entities seeking market-based rate authority for sales of ancillary services to perform a market power study to demonstrate the absence of market power in those products.

Frequency (Automatic Generation Control), Operating Reserve – Ten Minute Spinning, Operating Reserve – Ten Minute Non-Spinning, and Operating Reserve – Thirty Minute; New York Independent System Operator, Inc.: Regulation and Frequency Response Service, Operating Reserve Service (including Spinning Reserve, 10-Minute Non-Synchronized Reserves and 30-Minute Reserves); PJM Interconnection, L.L.C.: Regulation and Frequency Response, Energy Imbalance, Operating Reserve – Spinning, and Operating Reserve – Supplemental. *See* Order No. 697, FERC Stats. & Regs. ¶ 31,252 at n.1194. Midwest ISO: Regulation, Operating Reserve – Ten Minute Spinning and Operating Reserve – Supplemental. *See* Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 at P 90; 697-A, FERC Stats. & Regs. ¶ 31,268 at Appendix C. As the Commission stated in Order No. 697, a seller wishing to make sales of these ancillary services must include in its market-based rate tariff the standard ancillary services provisions, as applicable.

¹⁵ Sales under the WSPP Agreement are not limited to the WECC.

26. WSPP also claims that a market power study is not needed because reserve sales at market-based rates would be in addition to the reserve sales made by transmission providers under their OATT at cost-based rates. Currently, a third-party supplier may sell reserve service to transmission customers at market-based rates as long as that supplier already has authority to make energy sales at market-based rates.¹⁶ Additionally, third-party suppliers may sell reserve service at cost-based rates to a transmission provider who is purchasing ancillary services to satisfy its OATT requirement to offer ancillary services to its customers. However, under WSPP's proposal, a third-party supplier with authority to make energy sales at market-based rates would be able to sell reserve service at market-based rates to a transmission provider who is purchasing ancillary services to satisfy its OATT requirement to offer ancillary services to its customers. While many transmission providers fully self-supply to meet their OATT requirement to provide ancillary services, some transmission providers rely on third-party suppliers to meet a portion of their ancillary service requirements. As noted in the *Avista* Rehearing Order, the Commission is able "to grant blanket authority for flexible pricing only because the price charged by the third-party supplier is disciplined by the obligation of the transmission provider to offer these services under cost-based rates." The prohibition on third-party ancillary service sales to transmission providers in order for those transmission providers to meet their own ancillary service requirements thus was designed to address the Commission's concern that transmission providers not be allowed to substitute purchases under non-cost-based rates for their mandatory service obligation. We believe this concern remains valid today. Under WSPP's proposal, transmission providers that cannot fully self-supply their reserve service requirements would be able purchase reserve services from third-party suppliers at the prevailing market price where no market power study has been performed, and pass those costs through to transmission customers. In such circumstance, in the absence of a cost-based cap on the price of reserve services sold to transmission providers that rely on third-party suppliers to meet all or a portion of their reserve service needs, transmission customers would not be protected from unjust and unreasonable rates if the market price for reserve services is the result of the exercise of market power.

27. With respect to WSPP's request to waive the requirement that a separate description of reserves be included in a jurisdictional utility's market-based rate tariff, we deny this request. We disagree with WSPP's suggestion that it would be burdensome for entities to include ancillary services in their tariffs. We note that entities that sell ancillary services in RTOs/ISOs are required to include these services in their tariffs so

¹⁶ A seller wishing to make sales of ancillary services as a third-party provider must include the standard third-party provider provision in its market-based rate tariff. *See* Order No. 697, FERC Stats. & Regs. ¶ 31,252 at P 917; *see also* Order No. 697-A, FERC Stats. & Regs. ¶ 31,268 at P 386.

we find no reason to relieve parties transacting under the WSPP Agreement of this requirement.¹⁷

28. With respect to proposed Service Schedule E, we disagree that intra-hour supplemental power that would be provided under that proposed schedule is not an ancillary service in all instances. Without a defined scheduling interval, intra-hour supplemental power provided under proposed Service Schedule E may be analogous to energy or generator imbalance services under Schedule 4 or Schedule 9 of the OATT. Although WSPP states that for manually scheduled service, each hour is divided into equal intervals, as proposed Service Schedule E is currently written there is nothing to prevent a party from scheduling manually on an interval shorter than the standard time interval for scheduling energy sales. Absent the proposed Service Schedule E, energy requirements of such an interval may be managed by imbalance ancillary services. Proposed Service Schedule E states “Each clock hour shall be divided into equal time periods (“Intervals”) which shall be stated in the Confirmation. Unless otherwise provided in the Confirmation, Purchaser shall have the right to make a single request for energy at any time during the Interval.”¹⁸ Therefore, even the manually scheduled version of intra-hour supplemental power that would be sold under proposed Service Schedule E could, in some instances, be an ancillary service. Therefore, proposed Service Schedule E is also subject to the *Avista* restrictions, and is denied for the reasons discussed above.

29. We understand and appreciate the difficulties that WSPP may face in developing a proposal to allow its members to sell reserve services at market-based rates. For the reasons noted above, however, we are unable to accept WSPP’s proposal. We nevertheless encourage parties to submit a proposal that can address our concerns and note that we remain open to new approaches.¹⁹

¹⁷ See Order No. 697, FERC Stats. & Regs. ¶ 31,252 at P 917; Order No. 697-A, FERC Stats. & Regs. ¶ 31,268 at P 387.

¹⁸ WSPP Service Schedule E at E-3.1.1.1(c).

¹⁹ See, e.g., *Request for Comments Regarding Rates, Accounting and Financial Reporting for New Electric Storage Technologies*, Docket No. AD10-13-000, 75 Fed. Reg. 36,381 (2010).

The Commission orders:

WSPP's proposed Service Schedule D and Service Schedule E are hereby rejected.

By the Commission.

(S E A L)

Kimberly D. Bose,
Secretary.