

# SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR  
3000 K STREET, NW, SUITE 300  
WASHINGTON, DC 20007-5116  
TELEPHONE (202) 424-7500

FACSIMILE  
WWW.SWIDLAW.COM

NEW YORK OFFICE  
THE CHRYSLER BUILDING  
405 LEXINGTON AVENUE  
NEW YORK, NY 10174  
TEL. (212) 973-0111  
FAX (212) 891-9598

JULIA MOORE  
DIRECT DIAL: (202) 295-8357  
FAX: (202) 424-7643  
JULIAMOORE@SWIDLAW.COM

October 8, 2004

The Honorable Magalie R. Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: California Independent System Operator Corporation  
Docket No. ER04-1228-\_\_\_**

## **Errata - Transmission Access Charge Informational Filing**

Dear Secretary Salas:

On September 15, 2004, the California Independent System Operator Corporation ("ISO") made an informational filing intended to provide notice regarding the revised transmission Access Charges for the period of August 13, 2003 to December 31, 2003. The basis for the revision was a settlement recently approved by the Commission in Docket Nos. ER03-409, *et al.*<sup>1</sup> It has come to the ISO's attention that the September 15 Filing was incomplete, as described below. The ISO now makes the instant errata filing to ensure that the Commission and ISO Market Participants have accurate information regarding the Access Charges in effect from August 13, 2003 through December 31, 2003. The ISO stresses that although the incorrect *description* of the Access Charges was provided in the informational filing of September 15, 2004, no error has been made in how these charges have been *applied*.

### Correction to Changes in Rates

The transmission Access Charges provided in the September 15 Filing were intended to revise the Access Charges and Wheeling Access Charges first provided for informational purposes in the ISO's submission of September 17,

<sup>1</sup> *Pacific Gas and Electric Company*, 108 FERC ¶ 61,169 (2004).

2003 in Docket No. ER03-1357, and revised effective October 1, 2003 in a filing made on September 30, 2003 in Docket No. ER03-1404. The changes were described as being effective from August 13, 2003 through December 31, 2003, pursuant to the terms of the settlement in Docket Nos. ER03-409, *et al.* Additionally, worksheets purporting to illustrate the recalculation of the ISO's transmission Access Charge were included as an attachment to the transmittal letter.

Unfortunately, the September 15 Filing neglected to explain that the period from August 13 through December 31, 2003 would in fact be subject to two separate Access Charge rates – one from August 13 through September 30, 2003 and a second from October 1 through December 31, 2003. The rates provided in the September 15 Filing as covering the entire relevant period were in fact only applicable to the period from August 13 through September 30. Both this rate and the appropriate rate for the later timeframe are indicated below:

Access Charge Rate from August 13, 2003 through September 30, 2003

Northern Area -	\$ 2.0508/MWh
East Central Area -	\$ 2.6166/MWh
Southern Area -	\$ 2.5276/MWh

These rates are found on a worksheet provided with the filing as Attachment A.

Access Charge Rate from October 1, 2003 through December 31, 2003

Northern Area -	\$ 2.0933/MWh
East Central Area -	\$ 2.6591/MWh
Southern Area -	\$ 2.4110/MWh

These rates are found on a worksheet provided with the filing as Attachment B.

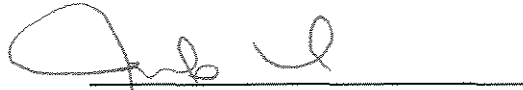
The ISO apologizes for any inconvenience caused by the error in the September 15 Filing.

Additionally, the ISO provides, in Attachment C to the present filing, a form of notice for this errata filing suitable for publication in the Federal Register, which is also provided in electronic form on the enclosed diskette.

The ISO has served copies of this transmittal letter and all attachments hereto on the Public Utilities Commission of the State of California, the California Energy Commission, the California Electricity Oversight Board, the Participating Transmission Owners, and on all parties with effective Scheduling Coordinator Service Agreements under the ISO Tariff. In addition, the ISO is posting this transmittal letter and all attachments on the ISO Home Page.

Two additional copies of this filing are enclosed to be date-stamped and returned to our messenger. If there are any questions concerning this filing, please contact the undersigned.

Respectfully submitted,



Charles F. Robinson  
General Counsel  
Anthony J. Ivancovich  
Senior Regulatory Counsel  
John Anders  
Corporate Counsel  
The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630

David B. Rubin  
Julia Moore  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW  
Suite 300  
Washington, DC 20007

Attorneys for the California Independent System Operator Corporation

## ATTACHMENT A

## TAC Rates

### August 13 - September 30, 2003

### Revised Rates Per FERC Docket Nos. ER03-409-003 and ER03-666-003

**TAC Components:**

	Filed Annual TRR Existing HV Facilities (\$) [1]	Filed Annual TRR New HV Facilities (\$) [2]	Filed Annual Gross Load (MWh) [3]	TAC Area [4]	Total Filed TRR (\$) = [1] + [2] [5]	EHVF only Utility Specific Rate (\$/MWH) = [1] / [3] [6]	EHVF only TAC Area Rate (\$/MWH) = [2] [7]	HV Utility Specific Rate (\$/MWH) = [5] / [3] [8]	TAC Area Rate (\$/MWH) = [9]
PG&E	\$ 136,834,244	\$ 42,432,420	82,761,368	N	\$ 179,266,664	\$ 1.6534	\$ 1.7871	\$ 2.1661	\$ 2.0508
SCE	\$ 169,946,053	\$ 7,062,648	84,358,000	EC	\$ 177,008,701	\$ 2.0146	\$ 2.3530	\$ 2.0983	\$ 2.6166
SDG&E	\$ 41,321,927	\$ 815,050	17,700,683	S	\$ 42,136,977	\$ 2.3345	\$ 2.2639	\$ 2.3805	\$ 2.5276
Anaheim	\$ 22,585,000	\$ -	2,589,830	EC	\$ 22,585,000	\$ 8.7206	\$ 2.3530	\$ 8.7206	\$ 2.6166
Azusa	\$ 1,417,712	\$ -	239,575	EC	\$ 1,417,712	\$ 5.9176	\$ 2.3530	\$ 5.9176	\$ 2.6166
Banning	\$ 1,066,849	\$ -	139,457	EC	\$ 1,066,849	\$ 7.6500	\$ 2.3530	\$ 7.6500	\$ 2.6166
Riverside	\$ 17,227,000	\$ -	1,814,019	EC	\$ 17,227,000	\$ 9.4966	\$ 2.3530	\$ 9.4966	\$ 2.6166
Vernon	\$ 10,175,975	\$ -	1,210,668	EC	\$ 10,175,975	\$ 8.4053	\$ 2.3530	\$ 8.4053	\$ 2.6166
<b>ISO Total</b>	<b>\$ 400,574,760</b>	<b>\$ 50,310,118</b>	<b>190,813,600</b>		<b>\$ 450,884,878</b>				

**STEP 1: Calculate the Access Charge Rate for each TAC Area.**

TAC-Area portion is the percent of Total TRR in each area which has not yet transitioned to the ISO (70%) divided by the Total Load of each area.

The ISO portion is the percent of all TRR which has transitioned to ISO-Wide (30%), plus the TRR of New HV Facilities, divided by total load.

	Annual TRR Existing HV Facilities (\$) [10] = [1]	Annual TAC Area TRR (\$) [11] = [10] x 70%	Annual Gross Load (GWH) [12] = [3]	TAC Area Rate (\$/MWH) [13] = [11] / [12]	ISO Wide TRR Existing HV Facilities (\$) [14] Total ([10] x 30%)	ISO Wide TRR New HV Facilities (\$) [15] = Total [2]	ISO Wide Annual Gross Load (GWH) [16] = Total [3]	ISO Wide Rate (\$/MWH) [17] = ([14] + [15]) / [16]	EHVF only ISO-Wide Rate (\$/MWH) [18] = [14] / [16]	TAC Rate (TAC Area + ISO Wide) (\$/MWH) [19] = [13] + [17]	Wheeling Rate (TAC Area + ISO Wide) (\$/MWH) [20] = [19]	Existing HV Facilities (EHVF) only TAC Rate (\$/MWH) [21] = [13] + [18]	New HV Facilities (NHVF) only TAC Rate (\$/MWH) [22] = [15] / [16]
North	\$ 136,834,244	\$ 95,783,971	82,761,368	\$ 1.1574						\$ 2.0508	\$ 2.0508	\$ 1.7871	\$ 0.2637
East/C	\$ 222,418,589	\$ 155,693,012	90,351,549	\$ 1.7232						\$ 2.6166	\$ 2.6166	\$ 2.3530	\$ 0.2637
South	\$ 41,321,927	\$ 28,925,349	17,700,683	\$ 1.6341						\$ 2.5276	\$ 2.5276	\$ 2.2639	\$ 0.2637
<b>Total</b>	<b>\$ 400,574,760</b>	<b>\$ 280,402,332</b>	<b>190,813,600</b>										
<b>ISO-wide</b>	<b>\$ 120,172,428</b>	<b>\$ 50,310,118</b>	<b>190,813,600</b>	<b>\$ 0.8935</b>					<b>\$ 0.6298</b>				

## TAC Rates

### August 13 - September 30, 2003

### Revised Rates Per FERC Docket Nos. ER03-409-003 and ER03-666-003

STEP 2: Calculate the HV Access Charge the UDC/MSS pays on Filed Gross Load and Benefit/Burden. Note: ISO total for (Benefit)/Burden may not equal zero due to rounding of TAC Rate.

TAC Area	Filed Gross Load (MWh) [23]	EHVF only TAC Rate (\$/MWh) [24]	Amount Paid Based on Filed Gross Load (\$) [25]	EHVF only Utility Specific Rate (\$/MWh) [26]	Would Have Paid w/ EHVF Utility Specific Rate (\$) [27]	EHVF Access Charge (Benefit)/Burden (\$) [28]
PG&E	82,761,368	1.7871	147,906,223	1.6534	136,834,244	11,071,979
SCE	84,358,000	2.3530	198,492,174	2.0146	169,946,053	28,546,721
SDG&E	17,700,683	2.2639	40,073,056	2.3345	41,321,927	(1,248,871)
Anaheim	2,589,830	2.3530	6,093,821	8.7208	22,585,000	(16,491,179)
Azusa	239,575	2.3530	563,715	5.9176	1,417,712	(853,997)
Banning	139,457	2.3530	328,140	7.6500	1,066,849	(738,709)
Riverside	1,814,019	2.3530	4,268,352	9.4966	17,227,000	(12,958,648)
Vernon	1,210,668	2.3530	2,848,679	8.4053	10,175,975	(7,327,296)
<b>ISO Total</b>	<b>190,813,600</b>		<b>400,574,760</b>		<b>400,574,760</b>	<b>(0)</b>

STEP 3: For information only -- Projected annual net benefits/burdens from Access Charge for Existing Facilities.

\$32/32/8 million cap for IOUs; munits are held harmless; IOUs pay muni cost increases in proportion to their cap relative to the total cap.

EHVF Access Charge (Benefit)/Burden (\$)	IOU Burden Annual Cap (\$)	IOUs' Cap Exceeds IOUs' Burden Exceeds IOUs' Cap (\$)	Amount IOU's Burden Exceeds IOUs' Cap (\$)	Payments by Entities with Net Benefit (\$)	Mitigation Payments (\$)	Adjusted Net (Benefit) / Burden (\$)	Reallocation IOU Burden (\$)	Transition Charge (\$)	Adjusted Net (Benefit) / Burden (\$)	Transition Charge Rate (\$/MWh)
11,071,979	32,000,000	20,928,021	0	0	0	11,071,979	5,981,279	5,981,279	17,053,257	0.0723
28,546,721	32,000,000	3,453,279	0	0	0	28,546,721	(11,493,464)	(11,493,464)	17,053,257	(0.1362)
(1,248,871)	8,000,000	9,248,871	0	0	0	(1,248,871)	5,512,186	5,512,186	4,263,314	0.3114
(16,491,179)	0	0	0	0	0	(16,491,179)	0	0	(16,491,179)	0
(853,997)	0	0	0	0	0	(853,997)	0	0	(853,997)	0
(738,709)	0	0	0	0	0	(738,709)	0	0	(738,709)	0
(12,958,648)	0	0	0	0	0	(12,958,648)	0	0	(12,958,648)	0
(7,327,296)	0	0	0	0	0	(7,327,296)	0	0	(7,327,296)	0
<b>Total</b>	<b>72,000,000</b>	<b>33,630,171</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

STEP 4: For information only -- Projected annual net benefits/burdens from Access Charge for New Facilities and Total projected annual net benefits/burdens from Access Charge.

Filed New HV Facilities (\$)	ISO Wide Annual Gross Load (MWh)	New HVTRR Rate (\$/MWh)	New HVTRR Cost Responsibility (\$)	NHVF Access Charge (Benefit)/Burden (\$)	Total Access Charge (Benefit)/Burden (\$)
42,432,420	82,761,368	0.2637	21,820,951	(20,611,469)	(3,558,212)
7,062,648	84,358,000	0.2637	22,241,921	15,179,273	32,232,530
815,050	17,700,683	0.2637	4,666,981	3,851,931	8,115,245
-	2,589,830	0.2637	682,837	682,837	(15,808,342)
-	239,575	0.2637	63,167	63,167	(790,830)
-	139,457	0.2637	36,769	36,769	(701,940)
-	1,814,019	0.2637	478,286	478,286	(12,480,361)
-	1,210,668	0.2637	319,206	319,206	(7,008,090)
<b>Total</b>	<b>50,310,118</b>	<b>0.2637</b>	<b>50,310,118</b>	<b>0</b>	<b>0</b>

## ATTACHMENT B

TAC Rates

October 1 - December 31, 2003  
 Revised Rates Per FERC Docket Nos. ER03-409-003 and ER03-666-003

TAC Components:

	Filed Annual TRR Existing HV Facilities (\$)	Filed Annual TRR New HV Facilities (\$)	Filed Annual Gross Load (MWh)	TAC Area	Total Filed TRR (\$)	EHVF only Utility Specific Rate (\$/MWh)	EHVF only TAC Area Rate (\$/MWh)	HV Utility Specific Rate (\$/MWh)	TAC Area Rate (\$/MWh)
	[1]	[2]	[3]	[4]	[5] = [1] + [2]	[6] = [1] / [3]	[7] = [2] / [3]	[8] = [5] / [3]	[9] = [9] / [10]
PG&E	\$ 136,834,244	\$ 42,432,420	82,761,368	N	\$ 179,266,664	1.6534	1.7809	2.1661	2.0933
SCE	\$ 169,946,053	\$ 7,062,648	84,358,000	EC	\$ 177,008,701	2.0146	2.3467	2.0983	2.6591
SDG&E	\$ 40,891,499	\$ 10,649,151	19,404,874	S	\$ 51,540,650	2.1073	2.0986	2.6561	2.4110
Anaheim	\$ 22,585,000	-	2,589,830	EC	\$ 22,585,000	8.7206	2.3467	8.7206	2.6591
Azusa	\$ 1,417,712	-	239,575	EC	\$ 1,417,712	5.9176	2.3467	5.9176	2.6591
Banning	\$ 1,066,849	-	139,457	EC	\$ 1,066,849	7.6500	2.3467	7.6500	2.6591
Riverside	\$ 17,227,000	-	1,814,019	EC	\$ 17,227,000	9.4966	2.3467	9.4966	2.6591
Vernon	\$ 10,175,975	-	1,210,668	EC	\$ 10,175,975	8.4053	2.3467	8.4053	2.6591
<b>ISO Total</b>	<b>\$ 400,144,332</b>	<b>\$ 60,144,219</b>	<b>192,517,791</b>		<b>\$ 460,288,551</b>				

STEP 1: Calculate the Access Charge Rate for each TAC Area.

TAC-Area portion is the percent of Total TRR in each area which has not yet transitioned to the ISO (70%) divided by the Total Load of each area. The ISO portion is the percent of all TRR which has transitioned to ISO-wide (30%), plus the TRR of New HV Facilities, divided by total load.

	Annual TRR Existing HV Facilities (\$)	Annual TRR TAC Area TRR (\$)	Annual Gross Load (GWh)	TAC Area Rate (\$/MWh)	ISO Wide Existing HV Facilities (\$)	ISO Wide New HV Facilities (\$)	ISO Wide Annual Gross Load (GWh)	ISO Wide Rate (\$/MWh)	EHVF only ISO-wide Rate (\$/MWh)	Wheeling Rate (TAC Area + ISO Wide) (\$/MWh)	TAC Rate (TAC Area + ISO Wide) (\$/MWh)	Existing HV Facilities (EHVF) only Rate (\$/MWh)	New HV Facilities (NHVF) only TAC Rate (\$/MWh)
	[10]	[11] = [10] x 70%	[12]	[13] = [11] / [12]	[14]	[15]	[16]	[17] = ([14] + [15]) / [16]	[18] = [14] / [16]	[19] = [13] + [17]	[21] = [19] + [18]	[22] = [15] / [16]	
North	\$ 136,834,244	\$ 95,783,971	82,761,368	1.1574						2.0933	1.7809	0.3124	
East/C	\$ 222,418,589	\$ 155,693,012	90,351,549	1.7232						2.6591	2.3467	0.3124	
South	\$ 40,891,499	\$ 28,624,049	19,404,874	1.4751						2.4110	2.0986	0.3124	
<b>Total</b>	<b>\$ 400,144,332</b>	<b>\$ 280,101,032</b>	<b>192,517,791</b>										
ISO Wide TRR Existing HV Facilities (\$)					ISO Wide TRR New HV Facilities (\$)								
<b>ISO-wide</b>	<b>\$ 120,043,300</b>	<b>\$ 60,144,219</b>	<b>192,517,791</b>										



## TAC Rates

### October 1 - December 31, 2003

### Revised Rates Per FERC Docket Nos. ER03-409-003 and ER03-666-003

STEP 2: Calculate the HV Access Charge the UDC/MSS pays on Filed Gross Load and Benefit/Burden. Note: ISO total for (Benefit)/Burden may not equal zero due to rounding of TAC Rate.

TAC Area	Filed Gross Load (MWh) [23]	EHVF only TAC Rate (\$/MWh) [24]	Amount Paid Based on Filed Gross Load (\$) [25]	EHVF only Utility Specific Rate (\$/MWh) [26]	Would Have Paid w/ EHVF Utility Specific Rate (\$) [27]	EHVF Access Charge (Benefit)/Burden (\$) [28]
PG&E	82,761,368	1.7809	147,389,319	1.6534	136,834,244	10,555,075
SCE	84,358,000	2.3467	197,965,899	2.0146	169,946,053	28,019,846
SDG&E	19,404,874	2.0986	40,723,841	2.1073	40,891,499	(167,658)
Anaheim	2,589,830	2.3467	6,077,646	8.7206	22,585,000	(16,507,354)
Azusa	239,575	2.3467	562,219	5.9176	1,417,712	(855,493)
Banning	139,457	2.3467	327,269	7.6500	1,066,849	(739,580)
Riverside	1,814,019	2.3467	4,257,022	9.4966	17,227,000	(12,969,978)
Vernon	1,210,668	2.3467	2,841,117	8.4053	10,175,975	(7,334,858)
<b>ISO Total</b>	<b>192,517,791</b>		<b>400,144,332</b>		<b>400,144,332</b>	<b>(0)</b>

STEP 3: For information only -- Projected annual net benefits/burdens from Access Charge for Existing Facilities.

\$32/32/8 million cap for IOUs; munis are held harmless; IOUs pay muni cost increases in proportion to their cap relative to the total cap.

EHVF Access Charge (Benefit)/Burden (\$)	IOU Burden Annual Cap (\$)	IOUs' Cap Exceeds IOUs' Burden (\$)	Amount IOUs' Burden Exceeds IOUs' Cap (\$)	Payments by Entities with Net Benefit (\$)	Mitigation Payments (\$)	Adjusted Net (Benefit) / Burden (\$)	Reallocation IOU Burden (\$)	Transition Charge (\$)	Adjusted Net (Benefit) / Burden (\$)	Transition Charge Rate (\$/MWh)
PG&E	32,000,000	21,444,925	0	0	0	10,555,075	6,514,819	6,514,819	17,069,895	0.0787
SCE	32,000,000	3,980,154	0	0	0	28,019,846	(10,949,951)	(10,949,951)	17,069,895	(0.1298)
SDG&E	8,000,000	8,167,658	0	0	0	(167,658)	4,435,132	4,435,132	4,267,474	0.2286
Anaheim	0	0	0	0	0	(16,507,354)	0	0	(16,507,354)	0
Azusa	0	0	0	0	0	(855,493)	0	0	(855,493)	0
Banning	0	0	0	0	0	(739,580)	0	0	(739,580)	0
Riverside	0	0	0	0	0	(12,969,978)	0	0	(12,969,978)	0
Vernon	0	0	0	0	0	(7,334,858)	0	0	(7,334,858)	0
<b>Total</b>	<b>72,000,000</b>	<b>33,592,737</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

STEP 4: For information only -- Projected annual net benefits/burdens from Access Charge for New Facilities and Total projected annual net benefits/burdens from Access Charge.

Filed Annual TRR New HV Facilities (\$)	ISO Wide Annual Gross Load (MWh)	New HVTRR Rate (\$/MWh)	New HVTRR Cost Responsibility (\$)	NHVF Access Charge (Benefit)/Burden (\$)	Total Access Charge (Benefit)/Burden (\$)
PG&E	82,761,368	0.3124	25,855,365	(16,577,055)	492,840
SCE	84,358,000	0.3124	26,354,167	19,291,519	36,361,414
SDG&E	19,404,874	0.3124	6,062,250	(4,586,901)	(319,427)
Anaheim	2,589,830	0.3124	809,085	809,085	(15,698,269)
Azusa	239,575	0.3124	74,845	74,845	(780,648)
Banning	139,457	0.3124	43,568	43,568	(696,013)
Riverside	1,814,019	0.3124	566,715	566,715	(12,403,262)
Vernon	1,210,668	0.3124	378,223	378,223	(6,956,635)
<b>Total</b>	<b>192,517,791</b>		<b>60,144,219</b>	<b>0</b>	<b>0</b>

## ATTACHMENT C

NOTICE SUITABLE FOR PUBLICATION IN THE  
FEDERAL REGISTER

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System ) Docket No. ER04-1228-\_\_\_\_  
Operator Corporation )

Notice of Filing

[ ]

Take notice that, on October 8, 2004, the California Independent System Operator Corporation ("ISO") submitted an errata to its informational filing of September 15, 2004 regarding the ISO's revised transmission Access Charge rates for the period of August 13, 2003 through December 31, 2003 to implement the settled rate for Pacific Gas and Electric Company TO6. The purpose of the errata filing is to correct the information provided in the September 15 Filing regarding the Access Charge rate for the period from October 1, 2003 through December 31, 2003.

The ISO states that this filing has been served upon the Public Utilities Commission of the State of California, the California Energy Commission, the California Electricity Oversight Board, the Participating Transmission Owners, and upon all parties with effective Scheduling Coordinator Service Agreements under the ISO Tariff. In addition, the ISO is posting the filing on the ISO Home Page.

Any person desiring to be heard or to protest the filing should file a motion to intervene or protest with the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426, in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 C.F.R. §§ 385.211 and 385.214). All such motions or protests must be filed in accordance with § 35.9 of the Commission's regulations. Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a motion to intervene. Copies of this filing are on file with the Commission and are available for public inspection in the Public Reference Room. Copies of this fling also may be viewed on the Commission's web site at <http://www.ferc.gov>, using the eLibrary (FERRIS) link. Enter the docket number excluding the last three digits in the docket number field to access the document. For assistance, please contact FERC Online Support at [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov) or toll-free at (866)208-3676, or for TTY, contact (202)502-8659. Protests and interventions may be filed electronically via the Internet in lieu of paper; see 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site under the "e-Filing" link. The Commission strongly encourages electronic filings.

Comment Date: \_\_\_\_\_