

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

North Hartland, LLC [“NHL” or “QF”]) “Complainant”) v.) Central Vermont Public Service Corp.) “Respondent”))	Docket EL03 - _ _ _ _ - 000
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COMPLAINT AND REQUEST FOR FAST TRACK PROCESSING

Under Part 385 Commission Rules of Practice and Procedure (§385.206 & 206(h))

NHL is filing this complaint against Central Vermont¹ because CV has purposely violated Federal Laws² and Commission regulations for the past five years. Further, CV uses its dominance in Vermont and its market power as a monopoly serving ¾ of the region to frustrate, and deny NHL QF electricity sales at full avoided cost. CV endeavors to coerce NHL to sell its QF output at bottom fisher rates by demanding entitlement to all QF unit capability as consideration for CV paying the NHL 80% of the spot market energy price, paying nothing for ICAP, nothing for renewable certificates, and paying nothing for any other commodity. CV says if NHL sells all of the QF unit capability at 80% of the spot market energy clearing price then CV shall waive its egregious tariffs for interconnection. On the other hand CV itself enjoys years of fat revenue from prices 400% above the market from sales of electricity to itself by virtue of its ownership of a QF in Vermont. NHL has refused to go along with this predatory practice but instead made several QF offers to sell electricity at actual, full avoided cost. As a result CV claims egregious use charges by pan caking tariffs and pan caking its standard loss deductions for use of its distribution system to get the power to any buyer. This coercion results in economic

¹Central Vermont Public Service Corporation [“CV” or “Central Vermont” or “CVPS”] is the largest regulated monopoly in the State of Vermont serving over 143,000 customers in nearly three-quarters of the towns, villages and cities; CV is the interconnecting electric utility with the QF known as North Hartland Hydroelectric Facility, first certified in 1985.

² Public Utility Regulatory Policies Act of 1978, 16 U.S.C. 2601 et seq. [PURPA], and Part 292 Commission Regulations under § 201 & 210 of PURPA as amended with regard to qualifying small power production facilities (QF).

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penalties in excess of \$20 per MWh in a wholesale market with LMP of \$45 per MWh. Nowhere in Commission's regulations is there an 80% reduction factor to actual avoided cost.

Without Subpart C of the Commission's regulations, the substitute method in Vermont structures conditions that are contrary to Federal law and regulation. Subpart C is absolutely necessary to encourage small power production under section 210 of PURPA. Widespread socialism obfuscates recognition of real cost in Vermont. This socialism by its nature increases the cost to all generators and consumers by its inefficient practices. For example, the State regulator orders all QF output to be purchased by an agent at a State wide avoided cost rates, but these rate schedules have not been published, approved, or issued for over 5 years. The State regulator orders QF electricity to be allocated to all of the 23 Vermont utilities. This is a naïve theory because any competent engineer knows this does not really happen. Any small production of power in an energy starved system is immediately absorbed by the connecting utility [CV] to serve its native load. By displacement the small producer's output eliminates CV's need to wheel electricity from far away resources to serve the local native load, which is a condition well known and contemplated by the Commission's regulations. But because of this socialized allocation of QF energy to all Vermont utilities, the connecting utility [CV] takes this opportunity to force the QF to pay pan caked distribution tariffs. But the QF never had a choice in this matter³, and this is contrary to Subpart C of Commission regulations. Any competent engineer knows the distribution of this QF energy across the entire state never really happens except in theory on paper; but this theory allows the connecting utility [CV] to deduct standard pan caked losses from the QF's metered output, resulting in a 12% revenue loss by allowing a reduced payment for kWh and a windfall profit to CV. The Commission has not issued an order exempting CV from the requirements under subpart C and the Commission has not issued an order to materially modify Subpart C to allow the substitution of the Vermont socialized scheme which does not encourages the development of small power production and cogeneration.

³ Section 292.303(d)

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Action & Inaction That Violate Applicable Regulatory Requirements in 18 CFR Part 292

We plead for the Commission to issue a compliance order instructing CV to produce avoided cost data, and we plead for a compliance order enforcing Commission regulations that require the connecting utility, Central Vermont, to directly purchase QF offered capacity and energy at its actual, full avoided cost rates pursuant to Subpart C. The specific complaints are:

Complaint # 1 CV has refused to provide avoided cost data⁴ which is a violation of Commission regulations. Commission regulations do not permit any electric utility to be exempted from the requirements of Sec. 292.302(b). CV is subject to penalties for failure to comply with Commission's regulations issued under section 133 of PURPA. CV objected to making the data available for public inspection because CV claimed this data was confidential.

Request for Relief #1. We respectfully request the Commission issue a compliance order instructing CV to immediately make available data pursuant to §292.302 of Commission regulations recognizing time is of the essence. We respectfully request the Commission impose the maximum penalty available under its regulations for CV's persistent violation §292.302, and §292.401 requirements in Commission regulations. CV knows well NHL's complaints from its pleadings before the Commission⁵ and State regulator. CV may simply resolve this matter by producing the electric utility system data in its answer to this complaint. We respectfully ask the Commission to extend its compliance order to include other Vermont electric utilities and a power aggregator representing municipal utilities.

Complaint # 2. CV is the interconnecting utility for the QF called North Hartland Hydroelectric Facility, FERC P-2816⁶. CV has violated Commission regulation §292.303(a) by refusing⁷ for 5

⁴ § 292.302 electric utility cost data; § 292.401 Implementation of certain reporting requirements & § 292.402 Waivers

⁵ State regulator Docket 6415; Commission dockets P-2816 & EL03-51

⁶ QF status certified in 1985 [QF85-248-000]; in 1999 [QF99-056-000], in 2000 [QF99-56-001].

⁷ Central Vermont refused to purchase QF Offered electricity at full avoided cost in 1998, 1999, 2000, 2001, & 2003 by written letters, emails, answers, and objections to NHL motions before the State regulator in PSB docket 6415; decisional employees making refusals include: attorney H. Hussey, power supply director R. Howland & Allan Connolly, attorney Morris Silver, and others. § Sec. 292.303(a) Electric utility obligations to purchase any energy and capacity which is made available from a qualifying facility directly to the electric utility.

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years to directly purchase the QF offered output at actual full avoided cost⁸. CV says it is not required to directly purchase QF electricity because the State regulator exempted CV from Subpart C §292.302 and §292.303 of Commission regulations. Commission records do not include any order exempting CV from any requirements under Commission's regulations, such as Subpart C and the State regulator has not been granted the power to exempt CV from the requirements of Subpart C in Commission regulations.

Request for Relief # 2. We respectfully request the Commission issue a compliance order instructing CV to immediately purchase the energy and capacity offered by NHL, at CV full avoided cost rates, as required by § 292.303(a) which obligates an electric utility to directly purchase electricity made available by any qualifying facility.

We respectfully request the Commission to issue a compliance order requiring CV to purchase the QF output of the North Hartland Generating Station under identical terms, conditions and prices for capacity and energy that CV plans to purchase under the Vermont Yankee Nuclear Power station Power Purchase Agreement [PPA]. This PPA was filed with the Commission for approval. All parties involved in the sale of Vermont Yankee have testified the PPA contains reasonable prices, terms and conditions and was a prudent management decision by CV, and so ordered by the State regulator. In the absence of any avoided cost data to the contrary, we ask the Commission to order a substitute purchase of QF electricity for a small portion of CV's planned purchases under the PPA, at the same rate, terms, prices and conditions. By so doing, CV complies with PURPA and Subpart A of the Commission's regulations, section 292.101(b)(6)....{Sic}..."(6) *Avoided costs means the incremental costs to an electric utility of electric energy or capacity or both which, but for the purchase from the qualifying facility or qualifying facilities, such utility would generate itself or purchase from another source."*.

NHL's request is on all fours with the avoided cost defined by Commission regulations, and this request does not allow a buyer to discriminate between sellers. A purchase of NHL QF output saves CV line losses and transmission capacity by avoiding the wheeling Vermont Yankee over a long distance to serve the 10 MW gross Quechee Village load.

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Documents Supporting Complaints.

Fact documents are attainable by the Complainant in the form of letters, motions, applications, electronic mail and other forms. But the real proof of these complaints shall be found in the CV response to this complaint concerning its refusal to report data and its refusal to purchase QF electricity.

NHL's complaint #1 can be easily refuted should CV produce the avoided cost data required by section 292.302, thereby making the complaint moot.

NHL's complaint #2 can be easily refuted should CV directly purchase the QF output at full avoided cost rates as required by subpart C of the Commission's regulations.

Irrelevant Ad hominem Attacks.

We respectfully ask the Commission to ignore ad hominem attacks that arise each time NHL files a pleading with the Commission. NHL suffers ad hominem attacks as retaliation for its complaints involving: (i) a department attorney re-defining avoided cost and imposing use charges without any authority to so do; (ii) a department attorney's refusal to perform a statutory duty required by State law and regulation, such as the production of avoided cost data and the production of avoided cost rates; (iii) bad faith conduct of a department attorney purposefully breaching a contract and subsequently covering up his conduct with a successful motion to deny NHL pro se appearances before the State regulator; (iv) a hearing officer's ex parte communication with FERC staff, a principal of the privately held purchasing agent, and others which were ignored by his superiors, and (v) a complaint about the 800 days of procrastination. All of these complaints caused an uproar, hand wringing, and the writing of derogatory missives. If anyone bothers to read them, they expose a clear lack of judicial temperament and impartiality. NHL anticipates the same retaliation shall occur in answers and motions filed in this docket. We respectfully request the Commission to dismiss these types of pleadings which are retaliatory in nature, lacking merit and being irrelevant to the complaints herein.

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Power Purchase Offers Withdrawn

Intervenors will say the resolution of this complaint is a QF sale of electricity to the so-called purchasing agent. No so. NHL has applied on no less than 5 occasions for a sale of QF power to the so-called purchasing agent for the Vermont utilities. All have gathered dust from years of inaction. The first application was filed by NHL's Vermont attorney November 1998. Nothing happened, but the agent demanded \$5,000 plus reimbursement of all of its cost including legal fees so it could litigate the application in the State regulator's forum, therein endeavoring to decide if a purchase of QF power at actual avoided cost rates was in the public interest. Amazing, too many people with time heavy on their hands. Nowhere in PURPA or in Commission regulations is litigation the prescribed method for purchasing QF output, and nowhere is there a condition requiring a determination that a purchase of QF output at actual full avoided cost is in the public interest; this has already been determined by PURPA and Part 292 of Commission regulations. Imposing this requirement is contrary to Commission regulation [292.303(a)]. As it turns out, NHL was making applications to a paper dragon. The so-called purchasing agent's contract is a very restrictive and a very limited agency, limited to performing accounting tasks. The agent is denied any authority to make any commitments; it may not enter into contracts, purchase power, or decide any other matter of substance without first obtaining the State regulator's prior approval, which by its procedure in fact means approval of 23 electric utilities in Vermont. All of this stuff runs contrary to PURPA and Commission regulations by frustrating and discouraging development of small power production facilities.

Intervenors shall say NHL withdrew 2 applications the State regulator to sell its QF. True but NHL was coerced to withdraw its applications after 800 days of procrastination, because Vermont utilities refused to provide avoided cost data, because the department refused to produce the avoided cost rates required by State law and regulation, because of the absence of any approved avoided cost rate schedules required by State law and regulation, and because the State regulator refused to enforce section 292.302(b) of the Commission's regulations. NHL declined to participate in the litigation ordered by the hearing officer that gave rise to great expense to determine if a purchase of QF output at actual avoided cost rates was in the public interest. NHL withdrew its applications because the hearing officer determined NHL was required to litigate avoided cost rates without any utility avoided cost data, and then NHL was to

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defend and justify its avoided cost rates against the attacks of CV and other utilities, and then argue why CV transmission tariffs should not be allowed to be charged to NHL for the purchasing agent's allocation of QF energy to all Vermont utilities. The hearing officer shifted the burden of justification of actual avoided cost from the electric utilities to the shoulders of the QF. This stands Commission regulations on their head. The litigation schedule forced upon NHL allowed 2 weekend days and 3 week days for discovery. CV's attorney like a Cheshire cat chuckled with his book of civil procedure stuck under his arm. Yes, NHL withdrew its application but not without good cause. This litigation procedure and the socialized scheme in Vermont do not in any fashion comply with PURPA. They are definitely not a valid substitute for subpart C of Commission regulations. We respectfully request the Commission to dismiss and ignore these types of pleadings.

Business and Economic issues related to the Complaint.

NHL seeks to sell QF electricity at actual, full avoided cost directly to the interconnecting utility, Central Vermont, pursuant to Commission regulations under §292.303(a). NHL seeks a compliance order enforcing Part 292 of Commission's regulations.

Excusing CV from its obligation to directly purchase QF electricity at actual full avoided cost rates directly results in a severe economic hardship to this QF and may well cause the re-development of this small power production facility located on Federal lands to fail for economic reasons, which is what we believe CV intends to accomplish.

NHL has been damaged by CV's persistent refusal to purchase QF electricity at actual, full avoided cost for the past 5 years. CV has protested, obstructed, and intervened for 5 years in all QF power sales matters. It has a full time attorney with a book of civil procedures under his arm making protest and filing objections to each and every petition for a QF sale to the State regulator or to any other entity. NHL has accrued over \$650,000 in expenses during the past 5 years that are attributable to CV's behavior, its refusal to provide avoided cost data, and its refusal to directly purchase QF electricity at actual, full avoided cost.

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Should the Commission decide to exempt CV from Subpart C §292.303(a) obligation to directly purchase QF output by substituting either the a socialized Vermont scheme or by substituting the spot market, then this Commission decision shall result in severe economic penalties that are not justifiable and not conforming to PURPA or Commission regulations. This decision shall directly result in the failure of the re-development of this QF, FERC Project P-2816, a result contrary to §292.402(b) requirements for granting waivers

Should the Commission decide not to act on this complaint then NHL shall suffer severe economic hardship, be subject to additional delays, litigation, and obstructionism. It is likely that the combined liens for property taxes, utility bills, and NHL's accrued expenses shall grow at an exponential rate to make re-development of this renewable resource economically impossible, unless the Commission acts in an expeditious fast track manner and refuses to grant CV an exemption to subpart C.

Financial Impacts of Commission Decisions.

NHL makes this good faith effort to quantify the financial impact and burden created for NHL as a result of (a) inaction by the Commission, and /or (b) a Commission order granting CV an exemption to subpart C. Either named action or inaction by the Commission directly results in severe economic penalties, as demonstrated by the below:

✓ Without a direct purchase of QF power by CV, NHL shall lose 12% of the QF revenue

This arises out of a CV postage stamp imposing pancaked distribution losses for interconnection and then for distribution facilities. A loss of 12% of revenue [\$70,000 per year] in a tight competitive wholesale market is very severe. A direct purchase by CV eliminates this theoretical loss that never really happens in the first instance because all of NHL's energy is absorbed by the native load in the Quechee Village [interconnection point]. As a technical matter CV never wheels NHL's QF output to others but it happily claims the standard loss deduction as a windfall. But without this QF supply resource, CV does wheel energy over its 46 kV systems to serve the Quechee Village load, and it suffers real line losses for so doing. By directly purchasing the QF output CV avoids actual, not theoretical, distribution losses to serve this Quechee Village load.

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✓ Without a direct purchase of QF power by CV, NHL shall loose of 50% of the revenue

This is another severe economic penalty if CV is excused from its obligations under 292.303(a). This arises out of pan caked tariffs totaling \$20 per MWh [\$200,000 per year] to theoretically transmit QF energy to a nearby LMP node, which never really happens, but CV gets a windfall from charging its tariffs to so do. A CV direct purchase of the QF output eliminates pan caked tariffs. But CV sees these charges as revenue entitlements as it games the system. In reality this QF's energy is not transmitted to any LMP node, it never really happens, because CV's Quechee Village load absorbs all of this QF's energy. If CV directly purchases the QF output CV will avoid the distribution losses it currently pays without this QF supply resource. But CV wants it all, it wants to enhance revenue by avoiding its current 46 kV wheeling expense to serve its Quechee Village load of about 10 MW gross, it wants to enhance its revenues by deducting losses that never occur from the payments to NHL for QF energy actually used by the native load in Quechee Village, and it wants to further enhanced its revenue by imposing pan caked tariffs for wheeling QF energy to the LMP node, something that never really happens when load flows go in the opposite direction. This is a text book example of unjust enrichment by a sharp operator gaming the regulations, and CV's reasons for refusing to directly purchase QF output.

✓ Excusing CV from its obligations is contrary to Commission regulations because compliance with all of the requirements of subpart C is absolutely necessary to encourage cogeneration and small power production in Vermont. Without a direct sale of QF output to the interconnecting utility the re-development of this QF will fail due to economic hardship arising out of the imposition of theoretical losses and tariffs that rob the QF of \$270,000 per year of revenue, out of total revenue of \$450,000. Should the redevelopment of this renewable energy facility fail then NHL shall loose \$850,000 for NHL's sunk cost. Should the redevelopment fail, the cumulative value of liens for property taxes, utilities, and sunk cost recorded so far in the public records against the FERC Project P-2816 assets shall exceed \$1.475 million. This does not consider the loss of license fees that have accumulated to a value exceeding \$125,000. This does not consider the 1981 Federal Financing Bank loan made to a Vermont cooperative with a face value exceeding \$85 million. Failure of this re-development shall deny the Federal government recovery [i.e. \$1.4 million] of a small portion of that 1981 loan the Vermont

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cooperative defaulted on, who also refuses to purchase QF output , and at this same instance is endeavoring to purchase the assets of Citizens utility in Vermont.

The financial impact and burden created for NHL as a result of inaction by the Commission, and /or a Commission order granting CV an exemption to subpart C are very severe; the direct result is an economic penalty that shall cause the re-development to fail, the Federal government shall not recover a portion of its loans, FERC shall not earn license fees, and the Town of Hartland VT shall lose property tax revenue it needs for its education fund.

Results of No Action on the Complaint

As a practical matter should the Commission decide not to act on this complaint then the QF facility located on Federal lands shall not be re-developed to alleviate the energy and natural gas crisis. A FERC licensed water power project shall continue to deplete as NHL plows through the courts and through the regulatory environment in Vermont and elsewhere. Environmental safeguards have been willfully neglected for over 7 years by the U.S.D.A., with apparent disregard for minimum flows required for water quality. FERC project property has been damaged, stolen and abandoned. The FERC P-2816 is not secured from terrorist threats; there is no security plan; the facility unguarded, adjacent to, and visible from a public highway. Vandalism has occurred. The facility is idle not producing power and wasting valuable water flows. The deadline for filing instruments of conveyance is September 26, 2003. Without an extension to said deadline we desperately need a power sales agreement to accomplish this conveyance, which is a customary requirement for any small power producer that is contemplated in PURPA and in the Commission regulations to encourage development.

Issues pending in Commission Proceedings or Another Forum.

Neither of NHL's complaints is pending resolution in another Commission proceeding or in another forum. Complaint #2 seeks a compliance order to remedy CV's refusals to directly purchase QF Offered electricity at full avoided cost; this is not an issue pending in another Commission docket or elsewhere. Complaint #1 seeks a compliance order to remedy CV's refusal to provide avoided cost data, and a request for the production of this data is not pending

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in another Commission docket or in another forum. But these matters have been presented as background information in filings in Docket P-2816.

The imposition of penalties for failure to implement reporting requirements has been discussed in Commission docket EL03-51 but disposition of penalties was left for action in another docket, whenever and if ever opened.

Use of Enforcement Hotline and Dispute Resolution Service

In September 2002 NHL sought the assistance of the FERC ADR staff to resolve certain disputes including the sale of QF power to the interconnecting utility, interconnection cost and the application of OATT tariffs to interconnection facilities. The ADR staff conducted serious inquiries for about 3 months. The staff was unable to accomplish any resolution. NHL offered a settlement that was rebuffed by CV, according to the ADR staff. Instead of compromise, CV doubled its already egregious claim for OATT and thereby sticking its finger in the ADR staff eye. ADR was abandoned after 4 months. NHL does not believe, based upon the responses and attitudes expressed by CV last September-through December 2002 to the ADR staff that ADR is a viable method for resolution of these matters. CV has DC attorneys on retainer and cash cow rate payers to fund its litigation without any limitation, which is the practice of regulated monopolies.

NHL does not object to the appointment of an administrative law judge to perform various ADR procedures, including mediation, arbitration, facilitation, and acting as settlement judge in a neutral, confidential, expeditious and efficient manner, ensuring that all parties are heard to the extent they desire. If so ordered by the commission, NHL shall appear pro-se; its development cost for this QF have exceeded \$850,000 and NHL can no longer afford the services of a \$500 per hour k street attorney with the meter running as it has so done during the past 5 years.

NHL has engaged the Enforcement Hotline but each time they have determined these complaints were outside its scope of work.

Requests for Fast Track Processing,

NHL's request for Fast Track processing is justified for many reasons including:

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✓ NHL is required to complete the filing of instruments of conveyance on or before September 26, 2003 and therefore the standard processes will not be adequate for expeditiously resolving the complaint.

✓ NHL must commence the repair and restoration of the QF facility [FERC Project P-2816] before the winter arrives in Vermont, the repair requires 6 months of work, and therefore the standard processes will not be adequate for expeditiously resolving the complaint.

✓ NHL continues to hold the burden for payment of delinquent and accruing property taxes attracting penalties and interest compounding monthly, and NHL must resolve these complaints before it can pay delinquent taxes and therefore the standard processes will not be adequate for expeditiously resolving the complaint.

Federal Register Notice

We have attached a file to this e-filing that is a form of notice suitable for publication in the Federal Register.

Respectfully submitted electronically this 22nd day of July 2003 by

NORTH HARTLAND, LLC

By: /s/ Robert L. Carey

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Great Falls, Virginia 22066
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served an electronic copy of the complaint on the respondent, affected regulatory agencies, and others we know to be affected by the complaint. We have accomplished simultaneous service by electronic mail in accordance with Section 385.2010(f)(3).

Dated at Washington, D.C., this 22nd day of July, 2003.

/s/ Robert L. Carey

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North Hartland, LLC ["NHL" or "QF"])	
"Complainant")	
v.)	Docket EL03-__ - 000
Central Vermont Public Service Corp.)	
"Respondent")	

NOTICE OF FILING

(July 22, 2003)

Take notice that on July 22, 2003, the North Hartland, LLC (NHL) tendered for filing with the Federal Energy Regulatory Commission (Commission) pursuant to Rule 206 of the Commission's Rules of Practice and Procedure, 18 CFR 385.206, a Complaint Requesting Fast Track Processing. NHL filed the Complaint against Central Vermont Public Service Corporation (CV) and states CV has refused to produce avoided cost data and CV has refused to purchase QF offered electricity from a QF known as the North Hartland Hydroelectric Project, P-2816. NHL asks FERC to utilize fast track processing and order CV to comply with Commission regulations. NHL seeks fast track relief on the grounds that it must file instruments of conveyance on or before September 26, 2003, it must commence the repair and restoration before the onset of winter, and it must pay delinquent property taxes.

Any person desiring to intervene or to protest this filing should file 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 (§385.211 and §385.214). 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. All such motions or protests should be filed on or before the comment date, and, to the extent applicable, must be served on the applicant and on any other person designated on the official service list. This filing is available for review at the Commission or may be viewed on the Commission's web site at

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<http://www.ferc.gov>, using the "FERRIS" link. Enter the docket number excluding the last three digits in the docket number field to access the document. For assistance, contact 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: August 11, 2003

Magalie R. Salas

Secretary

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