

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Great Lakes Utilities  
Indiana Municipal Power Agency  
Midwest Municipal Transmission Group  
Missouri Joint Municipal Electric Utility  
Commission  
Missouri River Energy Services  
Prairie Power, Inc.  
Southern Minnesota Municipal Power  
Agency  
Wisconsin Public Power Inc.,  
Complainants

v.

Midwest Independent Transmission  
System Operator, Inc.,  
Respondent

Ameren Services Company, *et al.*

v.

Midwest Independent Transmission  
System Operator, Inc.

Docket No. EL09-\_\_-000

Docket Nos. EL07-86, EL07-88,  
and EL07-92

**MIDWEST TDUS' SECOND RSG COMPLAINT AND  
MOTION TO CONSOLIDATE**

The Commission currently has pending before it three Section 206 complaints filed against the Midwest Independent Transmission System Operator, Inc. ("Midwest ISO"), seeking modification of MISO's current methodology for allocating Revenue Sufficiency Guarantee ("RSG") costs. The complaints were filed by Ameren Services Company ("Ameren") and Northern Indiana Public Service Company ("NIPSCO") in

Docket No. EL07-86-000 on August 10, 2007, by the Midwest TDUs<sup>1</sup> in Docket No. EL07-88-000 on August 17, 2007, and by Wabash Valley Power Association, Inc. in Docket No. EL07-92 on August 24, 2007.

On November 28, 2007, the Commission issued its initial order on the complaints. *Ameren Services Co. et al. v. Midwest Independent Transmission System Operator, Inc.*, 121 F.E.R.C. ¶ 61,205 (2007). The Commission found that “complainants have established a *prima facie* case under section 206 that the existing cost allocation methodology may be unjust, unreasonable, unduly discriminatory and/or preferential.” *Id.* P 94. Based on this finding, the Commission set the complaints for “paper hearing procedures and investigation to develop a record upon which to establish an alternative cost allocation methodology.” *Id.* The Commission also consolidated the three complaint dockets (*id.* P 22) and established the earliest possible refund-effective date, *i.e.*, August 10, 2007 (*id.* P 107).

A further order outlining the contours of the paper hearing was issued on August 21, 2008. *Ameren Services Co. v. Midwest Indep. Transmission Sys. Operator, Inc.*, 124 F.E.R.C. ¶ 61,173 (2008). Pursuant to this order, initial and reply briefs were filed in the three pending complaint dockets on September 22 and October 10, 2008, respectively. It appears highly unlikely that the Commission will issue a decision on the briefs in the pending proceedings prior to November 10, 2008, which will be the end of the 15-month

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<sup>1</sup> The members of the Midwest TDUs are Great Lakes Utilities, Indiana Municipal Power Agency, Midwest Municipal Transmission Group, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, Prairie Power, Inc., Southern Minnesota Municipal Power Agency, and Wisconsin Public Power Inc.

refund period provided for in Section 206(b) of the Federal Power Act as it applies to the three pending complaints.

Accordingly, pursuant to Section 206 of the Federal Power Act and Commission Rule 206, 18 C.F.R. § 385.206, Midwest TDUs hereby submit a second complaint regarding the same RSG issues. Midwest TDUs do so for the sole purpose of ensuring the potential for refunds throughout the entire period between August 10, 2007 and the date on which the Commission establishes a just and reasonable means of allocating real-time RSG costs to replace the existing tariff provisions.

#### **I. DESCRIPTION OF PARTIES AND CONTACT INFORMATION**

Respondent Midwest ISO is the provider of transmission service and the administrator of markets operated under the Transmission and Energy Markets Tariff (“TEMT”).

The complainants are more fully described in Attachment A hereto. Each of the Midwest TDUs is a load-serving entity (and/or represents member load-serving entities) taking service under the Midwest ISO TEMT, and therefore is directly affected by Midwest ISO’s RSG charges as well as increases in Revenue Neutrality Uplift charges that result from under-recovery of RSG costs.

The names, addresses, telephone numbers and email addresses of the representatives of Midwest TDUs, to whom communications concerning this matter should be directed, are as follows:<sup>2</sup>

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<sup>2</sup> To the extent necessary, we request waiver of 18 C.F.R. § 385.203(b)(3) to allow multiple addressees to be placed on the official service list, because this motion to intervene is filed on behalf of multiple entities and in order to expedite communications.

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**II. SECOND COMPLAINT AND MOTION TO CONSOLIDATE**

The three original complaints and other materials submitted by complainants in Docket Nos. EL07-86, EL07-88 and EL07-92 clearly demonstrate that the TEMT's current RSG provisions do not properly allocate real-time RSG costs to all who cause them. As a result, more than half of the RSG costs are not recoverable from the responsible market participants directly through RSG charges. These costs are instead recovered through Revenue Neutrality Uplift charges that are assessed on all Midwest

ISO loads, whether or not they had deviations that cause Midwest ISO to incur RSG costs. Furthermore, they are assessed *only* on loads, notwithstanding that the RSG costs that are a component of these uplift charges result from actions of other market participants (*e.g.*, that have only generation or that engage only in virtual supply offers and demand bids). As a result, these charges fail to reflect cost-causation, and are unjust and unreasonable, and unduly discriminatory.

The 15-month refund window under the original complaints will close on November 10, 2008. In order to ensure the Commission's uninterrupted ability to order refunds for the entire period between August 10, 2007 and the date of issuance of its order on the complaints, the Midwest TDUs submit this second complaint and request that the Commission adopt November 10, 2007 as the refund-effective date for RSG charges hereunder.<sup>3</sup>

In support of this second complaint, Midwest TDUs rely on, adopt, and incorporate by reference herein the allegations set forth in the complaints in Docket Nos. EL07-86, EL07-88 and EL07-92, and further incorporate by reference the brief and supporting affidavit filed by the Midwest TDUs on September 22, 2008 in those dockets. The Commission has already found that the original complaints "established a *prima facie* case under section 206 that the existing cost allocation methodology may be unjust, unreasonable, unduly discriminatory and/or preferential."<sup>4</sup>

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<sup>3</sup> The Commission has previously deemed it appropriate to allow multiple complaints on the same subject, consolidated into a single proceeding, with each complaint triggering a new 15-month refund period under FPA Section 206. See *San Diego Gas & Elec. Co. v. Public Serv. Co. of New Mexico*, 85 F.E.R.C. ¶ 61,414 (1998).

<sup>4</sup> *Ameren Serv. Co. et al. v. Midwest Indep. Transm. Sys. Operator, Inc.*, 121 F.E.R.C. ¶ 61,205, P 94 (2007).

Because the subject matter of this second complaint is identical to the original complaints, the Commission should consolidate this complaint with the first three complaints. Because this second complaint raises no new issues, and instead expressly relies on the pleadings filed in the prior complaint dockets, there should be no need for additional briefing or other procedures as a result of the consolidation of the proceedings. Indeed, the sole purpose of this second complaint is simply to prevent a gap in refund coverage resulting from the absence of an order prior to the expiration of the existing refund window.

Besides the pending complaint proceedings, the only pending proceeding of which we are aware involving the RSG issues discussed herein are certain ongoing proceedings in Docket No. ER04-691. Midwest TDUs sought informal resolution of the RSG issues through Midwest ISO's stakeholder process prior to bringing their original complaint, but their effort was not successful (as discussed in numerous pleadings in the original complaint dockets). Midwest TDUs continue to actively participate in the stakeholder process aimed at developing prospective changes to the real-time RSG cost allocation methodology, but those efforts will do nothing to preserve refunds.

Midwest TDUs are serving this second complaint on the contacts for the Respondent as listed on the Commission's list of Corporate Officials. We also submit a form of notice as Attachment B hereto. We request that the Commission waive the requirements of Rule 206 to the extent such requirements are not satisfied by this submittal and/or prior or supplemental filings by Midwest TDUs or others.

### III. REQUEST FOR RELIEF

For the reasons set forth above, Midwest TDUs request that the Commission (1) set for hearing the issue of whether Section 40.3.3.a.ii of the TEMT is unjust and unreasonable and/or unduly discriminatory, (2) find that the referenced provision is unjust and unreasonable and/or unduly discriminatory and establish the just and reasonable RSG provisions that should replace it, (3) establish November 10, 2008 as the refund-effective date for the required tariff revisions in order to cover any period between the expiration of the refund period in the existing complaint dockets and the issuance of a decision adopting just and reasonable real-time RSG cost allocation provisions, and (4) consolidate this second complaint with the original complaints, so that all of the complaints may be disposed of with a single order.

Respectfully submitted,

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November 5, 2008

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**ATTACHMENT A**

**ATTACHMENT A  
DESCRIPTION OF MIDWEST TDUS**

**Great Lakes Utilities (“GLU”)** is a municipal electric company formed under Section 66.0825, Wis. Stats., for the purpose of developing bulk power supplies to benefit its contracting members. The members of GLU are the following municipalities: Clintonville, Kiel, Manitowoc, Marshfield, Medford, Rice Lake, Shawano, and Wisconsin Rapids, Wisconsin. Each of the members is a Wisconsin municipal electric utility.

**Indiana Municipal Power Agency (“IMPA”)** is a body corporate and politic, and a political subdivision of the State of Indiana. IMPA’s members currently comprise 50 Indiana cities and towns. These members include 5 members located on the American Electric Power system in PJM, and 45 members within the MISO footprint; 8 members which are connected to the portion of the transmission grid that is owned by NIPSCO; 35 members which are connected to the “Joint Transmission System” portion of the transmission grid that is jointly owned by IMPA, Cinergy, and Wabash Valley Power Association; and 2 members connected to the portion of the MISO transmission system owned by Vectren Energy (*a.k.a.* Southern Indiana Gas & Electric Company). IMPA is a member of both MISO and PJM.

IMPA owns a 12.88 percent undivided interest in Louisville Gas & Electric Company’s (LG&E) Trimble County Unit No. 1 and has entered into a Participation Agreement for a similar ownership interest in Trimble County Unit No. 2, which is currently under development. IMPA also owns a 24.95 percent undivided interest in PSI Energy’s (PSI) Gibson 5 Unit; and owns two 75-megawatt combustion turbine units

located at Indianapolis, Indiana. These resources are all currently located in MISO. IMPA also owns and operates two 39-megawatt combustion turbine units located at Richmond, Indiana and two 39-megawatt and one 85-megawatt combustion turbine units located at Anderson, Indiana. These resources are located in PJM. The remainder of IMPA's power supply portfolio is composed of both long and short-term power agreements and purchases on the wholesale market, plus generation resources owned by IMPA's members in both MISO and PJM.

**Midwest Municipal Transmission Group ("MMTG")** was formed by and has as members two statewide associations of municipal utilities (the Iowa Association of Municipal Utilities ("IAMU"), the Minnesota Municipal Utilities Association ("MMUA")) and one municipal power supply agency (the Central Minnesota Power Supply Agency ("CMMPA")), which intervene along with and as part of MMTG. MMTG represents the interests of over 77 cities and governmental entities in Iowa and Minnesota and one in Illinois that depend upon adequate and equitably priced transmission and thus have a vital interest in assuring that transmission is available on fair, non-discriminatory and non-preferential terms and at just and reasonable rates. MMTG members have approximately 677 MW of load within the Upper Midwest and what was once the proposed TRANSLink footprint, much of which it anticipates will contribute to and be served by MISO transmission. Many MMTG members own transmission that contributes to the grid and generation that supports the grid.

**Missouri Joint Municipal Electric Utility Commission ("MJMEUC")** is a joint action agency and a political subdivision of the State of Missouri authorized by legislation to construct, operate and maintain jointly owned transmission and generation

facilities for the production and transmission of electric power for its members, to purchase and sell electric power and energy, and to enter into agreements with any person for transmission of electric power. It is organized on a statewide basis to promote efficient wheeling, pooling, generation, and transmission arrangements to meet the power and energy requirements of municipal utilities in the state. MJMEUC has 57 municipal utility members, and Citizens Electric Corporation, a rural electric cooperative with more than 21,000 customers, is an Advisory Member of MJMEUC. Together, MJMEUC's members serve some 347,000 retail customers, with a combined load of 2,100 MW.

Since January 1, 2000, pursuant to its authority under state law, MJMEUC has been administering a power pool formed by some of MJMEUC's members. The Missouri Public Energy Pool #1 ("MoPEP") currently has 26 members, whose 2005 summer peak load was expected to be approximately 370 MW. MoPEP is the full-requirements supplier for its members, and meets their capacity and energy requirements through generating and purchased-power resources contributed by the pool members, and through additional resources arranged for by MoPEP. MoPEP has pool loads and/or resources located within the transmission systems of several members of MISO and SPP.

**Missouri River Energy Services ("MRES")** is a municipal joint action agency formed under Chapter 28E of the Iowa Code and a member of MAPP. MRES is comprised of 60 full-member, and eighteen associate-member, municipal utilities located in the States of Iowa, Minnesota, North Dakota, and South Dakota. MRES provides firm supplemental power supply to 57 of its member systems, all of which are located within the MAPP region. MRES also engages in short-term energy transactions from its generation resources. Many of its members are surrounded by and dependent on

transmission facilities owned by MISO transmission owners, and thus are directly impacted by the policies and procedures established by MISO.

**Prairie Power, Inc. (“PPI”)**, formerly known as Soyland Power Cooperative,<sup>1</sup> is a member-owned, not-for-profit generation and transmission cooperative organized and existing under Illinois law. PPI currently provides all-requirements wholesale electric service to its members, 11 rural electric cooperatives located in central and southern Illinois (the “Members”). The Members organized PPI to provide for their collective power supply and transmission requirements. The Members provide retail electric service to approximately 78,000 metered retail member-consumers within their local service territories. The PPI Board is composed of two Directors from each of its Member distribution cooperatives.

PPI owns and operates approximately 587 miles of power lines at 138 kV and below, in addition to 85 substations. PPI is in the transmission rate zone of the Ameren Services Company (“Ameren”) and purchases transmission services under the MISO Tariff, and PPI has 137 delivery points directly or indirectly connected to the Ameren system. PPI purchases all of its capacity and energy requirements, which are not otherwise met by PPI’s own generation, from Ameren Energy Marketing.

**Southern Minnesota Municipal Power Agency (“SMMPA”)** is a joint action agency comprised of 18 member municipalities in Minnesota which own and operate municipal electric systems. SMMPA is a non-profit political subdivision of the State of Minnesota organized under Chapter 453 of the Minnesota Statutes. SMMPA functions as the principal power supplier for its members and met the 528 MW 2006 peak load of its

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<sup>1</sup> This name change became effective on July 1, 2007.

members with 652 MW of generating resources owned by SMMPA or its members and a portfolio of power purchases from other sources, including an allocation of power from the Western Area Power Administration. SMMPA is a MISO Market Participant.

SMMPA owns over 282 miles of transmission lines ranging from 69 kV to 230 kV that are integrated with those of other members of MAPP and MISO, as well as several transmission substations at varying transmission voltages, reflecting an investment of approximately \$100 million in facilities integrated in the MAPP/MISO grid. Although it owns portions of the network representing significant contributions to the regional grid, and although SMMPA is itself a MISO Transmission-Owning Member with a transmission ownership area, SMMPA is transmission-dependent upon the facilities of other MAPP and MISO members because many of SMMPA's members are located in the transmission ownership areas of Xcel Energy, ITC Midwest, Dairyland Power Cooperative, and Great River Energy.

**Wisconsin Public Power Inc. (“WPPI”)** is a municipal electric company formed pursuant to Sec. 66.0825, Wis. Stats. WPPI provides bulk power and other services to its 49 members (48 municipalities and one cooperative), each of which operates a distribution utility and sells electricity at retail to the residences, businesses, and industries in and around its municipality. These members are located within the Wisconsin, Michigan and/or Iowa service territories of four large investor-owned utilities: Northern States Power-Wisconsin, Wisconsin Electric Power Company (“WEPCO”), Integrys Energy Group (Wisconsin Public Service Corp. (“WPS”) and Upper Peninsula Power Co.), and Alliant Energy (Wisconsin Power & Light Co. (“WP&L”) and Interstate Power and Light Co.). Approximately 80 MW of WPPI load

located within the WPS geographic service area and about 300 MW of WPPI load located in the WP&L territory is electronically moved into the WEPCO control area. WPPI supplies the bulk power and energy requirements of its municipal members from generation resources owned by WPPI and through purchased power contracts.

WPPI is a member of MISO, with both generation and load within the MISO footprint, and is a participating owner of ATCLLC, which was formed pursuant to 1999 Wisconsin Act 9 with WPPI's support. ATCLLC has been accepted into MISO as a transmission-owning member effective January 1, 2001.

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**ATTACHMENT B**

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Great Lakes Utilities  
Indiana Municipal Power Agency  
Midwest Municipal Transmission Group  
Missouri Joint Municipal Electric Utility  
Commission  
Missouri River Energy Services  
Prairie Power, Inc.  
Southern Minnesota Municipal Power  
Agency  
Wisconsin Public Power Inc.,  
Complainants

v.

Midwest Independent Transmission  
System Operator, Inc.,  
Respondent

Docket No. EL09-\_\_-000

**NOTICE OF COMPLAINT**

(November \_\_, 2008)

Take notice that on November 5, 2008, pursuant to Rule 206 of the Rules of Practice and Procedure and section 206 of the Federal Power Act, Great Lakes Utilities, Indiana Municipal Power Agency, Midwest Municipal Transmission Group, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, Prairie Power, Inc., Southern Minnesota Municipal Power Agency, and Wisconsin Public Power Inc. (Complainants) filed a formal complaint against Midwest Independent Transmission System Operator, Inc. (Respondent) alleging that the Revenue Sufficiency Guarantee charge allocation provisions of the Respondent's tariff are unjust, unreasonable and unduly discriminatory, and therefore must be revised. The Complainants request that the Federal Energy Regulatory Commission (Commission) establish a refund-effective date of November 10, 2008 with respect to the necessary revisions.

The Complainants state that copies of the Complaint were served on the contacts for the Respondent as listed on the Commission's list of Corporate Officials.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 C.F.R. 385.211, 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 notice of intervention or motion to intervene, as appropriate. The Respondent's answer and all interventions, or protests must be filed on or before the comment date. The Respondent's answer, motions to intervene, and protests must be served on the Complainants.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at <http://www.ferc.gov>, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, D.C. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov), or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: 5:00 pm Eastern Time on November\_, 2008.

Kimberly D. Bose  
Secretary

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## **CERTIFICATE OF SERVICE**

CERTIFICATE OF SERVICE

I hereby certify that I have on this 5th day of November, 2008, caused the foregoing document to be sent by electronic mail to all parties on the list compiled by the Secretary of the Commission in Docket Nos. EL07-86, EL07-88 and EL07-92, and by first-class mail to the contacts for the Respondent as listed on the Commission's list of Corporate Officials, as follows:

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