147 FERC ¶ 61,011
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Acting Chairman;
Philip D. Moeller, John R. Norris,
and Tony Clark.

Virginia Electric and Power Company Dominion Energy Marketing, Inc. Dominion Nuclear Connecticut, Inc. Dominion Energy Kewaunee, Inc. Dominion Energy Brayton Point, LLC Dominion Energy Manchester Street, Inc. Dominion Retail, Inc. Elwood Energy, LLC Fairless Energy, LLC Kincaid Generation, L.L.C. NedPower Mount Storm, LLC Fowler Ridge Wind Farm LLC Dominion Bridgeport Fuel Cell, LLC.	Docket No. ER13-1908-000

ORDER CONDITIONALLY GRANTING REQUEST FOR WAIVER OF AFFILIATE RESTRICTIONS

(Issued April 3, 2014)

1. On July 8, 2013, Virginia Electric and Power Company (Dominion Virginia Power) and its market-regulated power sales affiliates (Dominion Marketing Affiliates)[1] (collectively, with Dominion Virginia Power, the Dominion Companies) filed a request for a waiver of the market-based rate affiliate restrictions in section 35.39 of the Commission's regulations[2] to permit the Dominion Companies to continue to share nine

[1] The Dominion Companies state that the Dominion Marketing Affiliates are Dominion Energy Marketing, Inc., Dominion Nuclear Connecticut, Inc., Dominion Energy Kewaunee, Inc., Dominion Energy Brayton Point, LLC, Dominion Energy Manchester Street, Inc., Dominion Retail, Inc., Elwood Energy, LLC, Fairless Energy, LLC, Kincaid Generation, L.L.C., NedPower Mount Storm, LLC (NedPower), Fowler Ridge Wind Farm LLC, and Dominion Bridgeport Fuel Cell, LLC.

[2] 18 C.F.R. § 35.39 (2013).

generation resource planning employees. In this order, we conditionally grant the Dominion Companies' request for waiver of the market-based rate affiliate restrictions with regard to these specific generation resource planning employees.

I. Background

2. The Dominion Companies state that they are subsidiaries of Dominion Resources, Inc. (Dominion Resources), a holding company under the Public Utility Holding Company Act of 2005. The Dominion Companies represent that Dominion Virginia Power provides electric service to captive retail customers located in Virginia and North Carolina.[3] The Dominion Companies state that the Dominion Marketing Affiliates have all received Commission authorization to make sales of energy, capacity and certain ancillary services at market-based rates.[4]

3. On March 7, 2011, Dominion Virginia Power and its market-regulated power sales affiliates submitted a request for waiver of the market-based rate affiliate restrictions so that they may continue sharing resource planning employees (March 2011 Filing).[5] On February 8, 2013, the Commission issued an order denying the request.[6] The Commission found that the Dominion Companies had not satisfied the Commission that the sharing of the resource planning employees as proposed in their March 2011 Filing would not result in harm to captive customers.[7]

4. On July 8, 2013, the Dominion Companies submitted a new waiver request to address the concerns expressed in the Order Denying Waiver. The Dominion Companies claim that a waiver of the market-based rate affiliate restrictions is appropriate because the proposed new commitments are clear and auditable and will ensure that Dominion Virginia Power's captive customers will not be harmed by the sharing of the generation

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[3] July 8 Filing at 3-4.

[4] *Id.* at 4.

[5] We note that the affiliates listed in the March 2011 Filing and the July 8 Filing differ slightly. Specifically, Dominion Energy New England, Inc., Dominion Energy Salem Harbor, LLC, and State Line Energy, L.L.C. are not included in the July 8 Filing. Dominion Bridgeport Fuel Cell, LLC was not included in the March 2011 Filing. This difference does not impact our analysis and, therefore, for simplicity, we will refer to the filers in both proceedings as "the Dominion Companies."

[6] *Virginia Electric and Power Co.*, 142 FERC ¶ 61,103 (2013) (Order Denying Waiver).

[7] *Id.* P 18.

resource planning employees between Dominion Virginia Power and the Dominion Marketing Affiliates.[8]

A. March 2011 Filing and Order Denying Waiver

5. In the March 2011 Filing, the Dominion Companies requested waiver of the affiliate restrictions so that they could share the following three groups of employees for resource planning purposes: (1) employees who "provide analyses and data for various parts of the resource planning process for both Dominion Virginia Power and for the Dominion Marketing Affiliates" and who "perform support functions, and are not involved in making any strategic decisions with respect to the development or acquisition of generation"; (2) employees who "are involved in implementing resource planning decisions" and who "perform support functions, and are not involved in making any strategic decisions with respect to the development or acquisition of generation"; and (3) "executives responsible for deciding whether or not to build or acquire a new generator and where to build such generation (in each case subject to the final approval of senior officers and the board of directors)."[9]

6. In support of the Dominion Companies' March 2011 Filing, the Dominion Companies stated that the sharing of these three groups of resource planning employees did not adversely affect Dominion Virginia Power's captive customers because the policies of the Dominion Companies prevented Dominion Virginia Power from competing for any resource planning opportunity with any of the Dominion Marketing Affiliates. The Dominion Companies represented that pursuant to their internal policy, the Dominion Companies could only consider generation development and acquisition opportunities for Dominion Virginia Power within Virginia, West Virginia and North Carolina and that the Dominion Companies may only consider generation development and acquisition opportunities for the Dominion Marketing Affiliates outside of those states.[10]

[8] July 8 Filing at 2.

[9] March 2011 Filing at 4-5; *see id*. at 18-19.

[10] *Id*. at 12.

7. In the Order Denying Waiver, the Commission denied the Dominion Companies' request for waiver.[11] The Commission stated that "[t]he Dominion Companies have not satisfied the Commission that the sharing of the three groups of resource planning employees as proposed in their application will not result in harm to captive customers."[12] In addition, the Commission stated, "Dominion Companies have not satisfied us that sharing these employees will not result in generation being built or acquired for the benefit of the market-regulated power sales affiliate at the expense of the captive customers of the franchised public utility."[13] Additionally, the Commission declined the Dominion Companies' request that if the Commission did not grant waiver to permit them to share individuals who are responsible for strategic decision making, it instead grant partial waiver permitting them to share all other employees involved in shared resource planning activities, which either provide analyses and data for the resource plans or implement those plans once decisions have been made. The Commission found that the Dominion Companies had not adequately supported the assertion or demonstrated that these employees will not have a role in making strategic decisions and that sharing these employees will not harm captive customers.[14] Therefore, the Commission denied the Dominion Companies' waiver request to permit them to share these employees.

B. July 8, 2013 Filing

8. In the July 8 Filing, the Dominion Companies state that their new waiver request is narrower and more precisely tailored and identifies the employees subject to the request.[15] Specifically, the Dominion Companies state that they request waiver of the separation of functions requirement of the affiliate restrictions (and, to the extent

[11] The Commission ordered the Dominion Companies to separate their shared resource planning functions within six months of the date of the order. We note that on July 8, 2013, the Dominion Companies filed a motion to extend the deadline for compliance. The request for an extension of time to comply was granted to and until 60 days after a Commission decision acting on the new request for waiver. *Virginia Electric and Power Co.*, Notice of Extension of Time, Docket No. ER11-3027-000 (July 18, 2013).

[12] Order Denying Waiver, 142 FERC ¶ 61,103 at P 18.

[13] *Id*. P 18.

[14] *Id*. P 22.

[15] July 8 Filing at 20.

necessary, of the information sharing requirement)[16] with respect to the Business Development group so that the Business Development group may continue to share employees performing early stage planning activities for both Dominion Virginia Power and the Dominion Marketing Affiliates.[17]

9. The Dominion Companies state that the Business Development group has nine employees and is a group within the Dominion Generation business unit.[18] They state that the Business Development group is the group within the Dominion Companies that is tasked, on a day-to-day basis, with coordinating the initial evaluation and analysis of options, and the development of proposals that form the basis for strategic decision-making.[19] The Dominion Companies state that the Business Development group performs the initial evaluation of options to meet the generation needs of Dominion Virginia Power and the Dominion Marketing Affiliates.[20] The Dominion Companies state that the Business Development group develops proposals for wholesale generation development or acquisition based on such evaluations and makes recommendations to senior management.[21]

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[16] We note that the Dominion Companies have not sufficiently described and supported a request for waiver of the information sharing requirement and therefore this order does not address such a request.

[17] July 8 Filing at 20.

[18] *Id*. at 7-8. The Dominion Companies state that Dominion Generation is one of three business units organized across corporate lines within Dominion Resources. *Id*. at 7.

[19] *Id*. at 8.

[20] The Dominion Companies state that the Business Development group identifies and coordinates the evaluation of potential generation projects that will meet the supply needs identified in Dominion Virginia Power's Integrated Resource Plan, with respect to potential wholesale generation projects for Dominion Virginia Power. The Dominion Companies state that potential generation projects are evaluated based on a number of criteria including ratepayer benefit and economic, environmental, technical, risk and regulatory factors. With respect to potential wholesale merchant generation projects, the Dominion Companies state that the Business Development group coordinates a similar evaluation, but rather than calculating ratepayer benefit, the group utilizes an estimate of financial returns and key development assessments. The Dominion Companies state that these calculations take into account potential market revenues or long-term bilateral contracts and risk considerations. *Id*. at 8.

[21] *Id*. at 7.

10. The Dominion Companies state that the waiver request is limited to the Business Development Group, which currently has nine professional employees, and does not apply to employees who already qualify as “permissible” shared employees (such as support personnel).[22] The Dominion Companies state that their request does not pertain to personnel already permitted to be shared because such personnel do not direct, organize, or execute generation or market functions on a day-to-day basis.[23] They also state that the waiver request does not apply to the personnel from the Dominion Companies who are responsible on a day-to-day basis for marketing functions.[24]

11. In addition, the Dominion Companies state that they modify and expand upon the commitments offered in the March 2011 Filing to address the concerns identified by the Commission in the Order Denying Waiver. The Dominion Companies state that these commitments ensure that Dominion Virginia Power’s captive customers are not adversely affected by the sharing of the identified resource planning personnel between the Dominion Companies.[25] These commitments are more fully described below.

1. The Dominion Companies’ Internal Policy and Compliance

12. In the Order Denying Waiver, the Commission determined that the Dominion Companies’ internal policy as proposed in the March 2011 Filing was not sufficient to ensure that the sharing of the requested resource planning employees would not harm captive customers. Under that policy, the Dominion Companies may only consider generation development and acquisition opportunities for Dominion Virginia Power within Virginia, West Virginia and North Carolina and the Dominion Companies may only consider generation development and acquisition opportunities for the Dominion Marketing Affiliates outside of those states. The Commission stated that it is not clear how the Commission could monitor compliance with the Dominion Companies’ commitment that if a shared executive identifies a favorable generation development opportunity in Virginia, North Carolina or West Virginia, it cannot transfer that opportunity to a Dominion Marketing Affiliate. Thus, the Commission stated that commitment was of little practical value.[26]

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[22] The Dominion Companies include in their filing the job descriptions of all current members of the Business Development group. *Id*. at 24 and Attachment C.

[23] *Id*. at 25.

[24] *Id*.

[25] *Id*. at 20.

[26] Order Denying Waiver, 142 FERC ¶ 61,103 at P 18.

13. In the July 8 Filing, to address the Commission's concern that the internal policy, which Dominion Companies refer to as the "Three State Commitment," would not protect captive customers, the Dominion Companies revise their commitment such that it is result-oriented, in that it is based on what actually happens (who buys or builds or contracts for wholesale generation, and where). They commit that the Dominion Marketing Affiliates will not build or buy wholesale generation projects in Virginia, North Carolina, or West Virginia.[27] The Dominion Companies state that this simplified Three State Commitment protects captive customers by directly addressing the Commission's concern that the commitment as described in the March 2011 Filing did not ensure that the proposed sharing of resource planning employees would not result in the construction or acquisition of generation for the benefit of the Dominion Marketing Affiliate to the detriment of Dominion Virginia Power's captive customers.[28]

14. As an additional protection, the Dominion Companies state that Dominion Virginia Power will have a right of first refusal on any wholesale generation project in PJM Interconnection, L.L.C. (PJM) under consideration by the Dominion Companies.[29] The Dominion Companies state that this protection extends beyond Virginia, North Carolina and West Virginia to the rest of the PJM region. The Dominion Companies state that for any wholesale generation project in PJM that the Dominion Companies consider, the initial analysis by the Business Development group will be a ratepayer-focused analysis to evaluate if the generation project would be beneficial to Dominion Virginia Power ratepayers. The Dominion Companies state that if it is determined that the generation project would benefit ratepayers, then Dominion Virginia Power will have the first right to develop the generation project. The Dominion Companies state that only if it is determined that the project does not benefit ratepayers would it then be considered as a merchant project (except that it would never be considered as a merchant project if it is a wholesale project in Virginia, West Virginia, or North Carolina, consistent with the Three State Commitment).[30] The Dominion Companies state that they will maintain a documented internal policy outlining the right of first refusal process and auditable records that show the ratepayer-focused analysis conducted on each generation project that is considered under the right of first refusal process.[31]

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[27] July 8 Filing at 21, 26-27.

[28] *Id*. at 27.

[29] *Id*. at 21, 28.

[30] *Id*. at 28.

[31] *Id*. at 29.

15. Regarding the Commission’s concern with respect to auditing compliance with the Dominion Companies’ Three State Commitment, the Dominion Companies explain that the Three State Commitment has been simplified such that compliance can be audited by examining whether any Dominion Marketing Affiliates own or control wholesale generation (other than NedPower, as described below) in the Three State Region.[32] The Dominion Companies state that they will keep documented internal policies outlining the right of first refusal processes for both generation project development and wholesale sales opportunities. Additionally, the Dominion Companies state that ratepayer-focused evaluations for generation projects and sales opportunities will be documented and maintained for audit purposes.[33] The Dominion Companies offer that they will annually conduct a self-audit of compliance with the commitments made in the July 8 Filing, as well as adopt training and additional compliance controls as appropriate to ensure compliance.[34] The Dominion Companies clarify that they will maintain auditable records regarding all commitments made in the July 8 Filing (not just the Three State Commitment).[35]

2. NedPower Mt. Storm, LLC

16. In the Order Denying Waiver, the Commission noted that one of the Dominion Marketing Affiliates, NedPower, owns and operates a 264 megawatt generation facility located in West Virginia (NedPower Facility), a state in which the Dominion Companies represent the Three State Commitment prevents the Dominion Marketing Affiliates from competing for potential generation opportunities.[36] The Commission stated that this inconsistency creates the possibility of competition for potential resources between Dominion Virginia Power and the Dominion Marketing Affiliates because of the overlapping geographic markets of the two.[37]

17. To address the Commission’s concerns, the Dominion Companies state in the July 8 Filing that Dominion Mount Storm Wind, LLC and Shell Wind Energy, Inc. (a third party non-affiliate) indirectly acquired an interest in the NedPower Facility in 2006, before the Three State Commitment was adopted. The Dominion Companies state

[32] *Id*. at 22, 33.

[33] *Id*. at 33.

[34] *Id*. at 22-23, 34.

[35] *Id*. at 22, 33.

[36] Order Denying Waiver, 142 FERC ¶ 61,103 at P 18.

[37] *Id*.

that the output of the NedPower Facility is marketed by Dominion Energy Marketing, Inc. (DEMI), a separate Dominion Marketing Affiliate, not by the Business Development group.[38] The Dominion Companies assert that there is not (and due to the Three State Commitment, will not be) any other Dominion Marketing Affiliate wholesale generation facility within the Three State Region to compete for resources.[39] The Dominion Companies represent that there will be no geographic overlap beyond this one facility, and thus no material potential for competition for resources which concerned the Commission in the Order Denying Waiver.

3. Acquiring Control Over Generation and Selling into Virginia, North Carolina, or West Virginia

18. In the Order Denying Waiver, the Commission noted that while the Dominion Companies claimed that the Dominion Marketing Affiliates cannot build generation in Virginia, North Carolina or West Virginia, there is nothing that would prevent them from selling power there or acquiring control over generation in those states. The Commission also stated that to the extent that the Dominion Marketing Affiliates and Dominion Virginia Power compete for opportunities to make sales, it is not clear that the internal policy limiting the geographic scope of resource planning for Dominion Virginia Power and the Dominion Marketing Affiliates would be sufficient to protect against shared employees directing favorable opportunities for the Dominion Marketing Affiliates to make sales to third parties that Dominion Virginia Power could otherwise have made, to the detriment of Dominion Virginia Power's captive customers.

19. In the July 8 Filing, the Dominion Companies state that power sales from existing Dominion Virginia Power and Dominion Marketing Affiliate generation, as well as power sales that are not specific to any generator, will continue to be carried out by independent, functionally-separated regulated and unregulated trading groups.[40] The Dominion Companies state that no Dominion Marketing Affiliate will enter into any agreement under which it acquires control over a new or existing wholesale generating unit (excluding the NedPower Facility) in the three states.[41] For instance, the Dominion Companies state that no Dominion Marketing Affiliate would enter into a contract providing the right to sell the output of such a facility, such as a tolling agreement or unit power purchase agreement. The Dominion Companies contend that this commitment prevents the Dominion Marketing Affiliates from contractually obtaining control over

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[38] July 8 Filing at 21, 31.

[39] *Id*. at 22.

[40] *Id*.

[41] *Id*.

wholesale generation in the three states in which they have committed that they will not build or acquire wholesale generation. The Dominion Companies assert that between this commitment and the Three State Commitment, the Dominion Marketing Affiliates will not gain control of any wholesale facility within the three states that would compete with Dominion Virginia Power for wholesale sales.[42]

20. The Dominion Companies assert that the Business Development group does not and will not have a role in identifying, negotiating, or otherwise being involved in any future sale from NedPower. In addition, the Dominion Companies commit that the Business Development group will follow the no-conduit rule.[43] Further, the Dominion Companies state that if a third party solicits a wholesale power sale within Virginia, North Carolina or West Virginia from a shared employee, Dominion Virginia Power will be given a right of first refusal on that power sale.[44] The Dominion Companies maintain that ratepayer protection is ensured on the front end, during generation development and any powers sales negotiation associated with it, by the geographic restrictions (the Three State Commitment and the right of first refusal for the rest of PJM).[45] Further, the Dominion Companies contend that continued ratepayer protection is ensured once a unit is operational by the existing separation of the regulated and unregulated trading operations, which ensures that these groups independently seek market opportunities for wholesale power sales.[46]

4. <u>State Oversight</u>

21. In the Order Denying Waiver, the Commission noted that although the Dominion Companies asserted that state oversight would be sufficient to prevent the Dominion Marketing Affiliates from building or acquiring generation in Virginia, North Carolina and West Virginia at the expense of Dominion Virginia Power's captive customers, the Dominion Companies' filing focused on the ability of the Virginia Commission and the North Carolina Commission (State Commissions) to review the resource planning activities of Dominion Virginia Power, and failed to explain the extent to which they would be in a position to review the resource planning activities of the Dominion

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[42] *Id*. at 32.

[43] *Id*.

[44] *Id*. at 22.

[45] *Id*. at 33.

[46] *Id*.

Marketing Affiliates to see if and how resource decisions that were foregone by Dominion Virginia Power might affect captive customers.[47]

22. In the July 8 Filing, the Dominion Companies explain that the information regarding oversight of their affiliate relationships by the State Commissions is not intended to justify reliance on this oversight on its own, but rather serves to provide added assurance of state agency oversight and protection of captive customers, in addition to the primary commitments made by the Dominion Companies.[48] The Dominion Companies state that while the State Commissions' oversight does not extend to the Dominion Marketing Affiliates' resource planning activities, their oversight of Dominion Virginia Power and of interactions between Dominion Virginia Power and its marketing affiliates reinforces the protections offered by the Dominion Companies.[49] The Dominion Companies provide additional information with respect to state rules on affiliate interactions to show that states not only oversee Dominion Virginia Power's planning process, but also monitor and oversee interactions between Dominion Virginia Power and the Dominion Marketing Affiliates.[50] The Dominion Companies represent that resource planning for the Dominion Companies' regulated businesses is closely supervised by the Virginia Commission and North Carolina Commission.

5. Labor Efficiencies and Administrative Costs

23. In the Order Denying Waiver, the Commission was unpersuaded by the Dominion Companies' assertion that Dominion Virginia Power's captive customers enjoy benefits arising from labor efficiencies and lower administrative costs that result from the shared planning functions of the Dominion Companies.[51] The Commission found that the Dominion Companies provided no evidence to support this claim. The Commission further stated that the Dominion Companies did not provide information as to how the costs of resource planning functions are currently allocated and shared between Dominion Virginia Power and the Dominion Marketing Affiliates nor how Dominion Virginia Power's cost allocation would increase if the separation of functions is maintained.[52]

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[47] Order Denying Waiver, 142 FERC ¶ 61,103 at P 19.

[48] July 8 Filing at 23, 35.

[49] *Id*. at 35.

[50] *Id*. at 23.

[51] March 2011 Filing at 32.

[52] Order Denying Waiver, 142 FERC ¶ 61,103 at P 20.

24. In the July 8 Filing, the Dominion Companies state that while there are cost savings and efficiencies associated with having a shared Business Development group that can handle all development opportunities, given the narrowed scope of this new waiver request, the quantifiable cost savings are less significant. However, the Dominion Companies state that they expect ratepayers would experience positive benefits as a result of the waiver, due to the knowledge and experience gained by the shared employees. Specifically, they state that the knowledge gained about the development and deployment of new and emerging technologies (e.g., fuel cell, solar) among the Dominion Marketing Affiliates directly benefits Dominion Virginia Power customers when those new technologies are considered for inclusion in the regulated generation portfolio.[53]

II. Notice of Filing

25. Notice of the Dominion Companies' July 8, 2013 Filing was published in the *Federal Register*, 78 Fed. Reg. 42,515 (2013), with interventions and comments due on or before July 29, 2013. None was filed.

III. Discussion

26. As discussed below, we conditionally grant the Dominion Companies' waiver of the market-based rate affiliate restrictions in section 35.39 of the Commission's regulations to permit the Business Development group to continue to share generation resource planning employees.

27. We find that the Dominion Companies have adequately addressed the Commission's concerns set forth in the Order Denying Waiver. As discussed above, the Dominion Companies make a number of commitments that are clear and auditable and that we find are necessary to address the Commission's concerns.[54] Thus, we conditionally grant the Dominion Companies' request for waiver of the separation of functions provision in 18 C.F.R. § 35.39 with regard to the nine employees in the Business Development group performing the limited, specified functions as described in the July 8 Filing, based on the Dominion Companies' representation that the sharing of these employees will not result in harm to captive customers. We interpret this representation to be a commitment that captive customers will not be harmed. Additionally, as a condition of this waiver, we require the Dominion Companies to maintain sufficient records to enable the Commission to audit whether the representations and commitments made in their July 8 Filing remain true and accurate, including their commitment that captive customers will not be harmed.

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[53] July 8 Filing at 23, 38-39.

[54] *See supra* PP 13-15, 17, 19-20.

28. The waiver conditionally granted herein is limited to the specific facts, representations, policies and procedures presented by the Dominion Companies in the July 8 Filing, and applies only to the generation resource planning employees discussed in the Dominion Companies' July 8 Filing. To the extent there is any material change in circumstances that would reflect a departure from the facts, representations, policies and procedures that we have relied upon in granting the requested waiver, the Dominion Companies will be required to inform the Commission within 30 days of any such change. With the exception of the limited waiver specifically granted herein or any waiver(s) granted previously, all of the other affiliate restrictions continue to apply to the Dominion Companies.

29. Finally, we direct the Dominion Companies to submit a compliance filing, within 30 days of the date of this order, revising the limitations and exemptions sections of their market-based rate tariffs to list the limited waiver granted herein and include a citation to this order.[55]

The Commission orders:

(A) The Dominion Companies' request for waiver of certain of the market-based rate affiliate restrictions is hereby granted, subject to conditions, as discussed in the body of this order.

(B) The Dominion Companies are hereby directed to submit a compliance filing, within 30 days of the date of this order, revising the limitations and exemptions sections of their market-based rate tariffs, as discussed in the body of this order.

(C) The Dominion Companies are hereby directed to maintain records to enable the Commission to audit their compliance, as discussed in the body of this order.

(D) The Dominion Companies must inform the Commission within 30 days of any material change in circumstances that would reflect a departure from the facts,

[55] *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 Appendix C (2007), *order on reh'g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268 at P 384 (2008).

representations, policies, and procedures the Commission relied upon in granting the waivers granted herein.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.