

172 FERC ¶ 61,233
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Neil Chatterjee, Chairman;
Richard Glick and James P. Danly.

GridLiance High Plains LLC	Docket Nos. ER20-1313-000
	ER19-1357-000
Southwest Power Pool, Inc.	ER18-2358-001
	(consolidated)

ORDER ESTABLISHING HEARING AND SETTLEMENT JUDGE PROCEDURES
AND CONSOLIDATING PROCEEDINGS

(Issued September 17, 2020)

1. On March 16, 2020, GridLiance High Plains LLC (GridLiance)¹ submitted its annual informational filing reflecting its projected net annual transmission revenue requirement (ATRR) for the 2020 rate year (2020 Annual Update), effective January 1, 2020, for its facilities that are included in the Southwest Power Pool, Inc. (SPP) Open Access Transmission Tariff (Tariff). On April 15, 2020, Xcel Energy Services Inc. (Xcel), on behalf of Southwestern Public Service Company (SPS), filed a formal challenge (Formal Challenge) to the 2020 Annual Update, arguing that GridLiance's inclusion of certain facilities in its 2020 Annual Update is improper, and a motion to consolidate this proceeding with the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000.² As discussed below, we set Xcel's Formal Challenge for hearing and settlement judge procedures and consolidate this proceeding with the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000.

I. Background

2. GridLiance recovers its Commission-jurisdictional costs through a forward-looking transmission formula rate template and protocols (together, Formula Rate) under

¹ GridLiance was formerly known as South Central MCN LLC.

² Docket Nos. ER18-2358-001 and ER19-1357-000 have previously been consolidated, as discussed below.

the SPP Tariff.³ On April 1, 2016, GridLiance acquired certain facilities from Tri-County Electric Cooperative, Inc. that are located in the Oklahoma panhandle region (Pre-Upgrade Oklahoma Assets).⁴ At the time of the acquisition, the Pre-Upgrade Oklahoma Assets were not eligible for rolled-in rate recovery from SPP Zone 11 transmission customers pursuant to Attachment AI⁵ of the SPP Tariff.⁶ According to GridLiance, in response to reliability concerns, GridLiance subsequently constructed certain upgrades and extensions to the Pre-Upgrade Oklahoma Assets, which GridLiance states resulted in a portion of the Pre-Upgrade Oklahoma Assets qualifying as Transmission Facilities under Attachment AI (i.e., the Upgraded Oklahoma Assets).⁷

3. On August 30, 2018, in Docket No. ER18-2358-000, SPP filed proposed Tariff revisions to add an ATRR for the Upgraded Oklahoma Assets once GridLiance transferred functional control of those facilities to SPP.⁸ Specifically, SPP proposed revisions to update, among other things, Table 1 of Attachment H of the SPP Tariff to include GridLiance's ATRR for the Upgraded Oklahoma Assets within Zone 11, the SPS pricing zone. Xcel protested the proposed Tariff revisions, arguing, among other things, that the Upgraded Oklahoma Assets do not qualify as transmission for cost-recovery under the Tariff and that the cost of upgrading the assets was not prudently incurred. The Commission accepted SPP's proposed Tariff revisions, effective November 1, 2018, subject to refund, and established hearing and settlement judge procedures.⁹

4. On March 15, 2019, in Docket No. ER19-1357-000, GridLiance submitted its 2019 Annual Update, which included, among other things, the costs of the Upgraded Oklahoma Assets. Xcel filed a formal challenge, arguing that GridLiance's inclusion of those facilities in its 2019 Annual Update is improper, and a motion to consolidate that proceeding with the pending proceeding in Docket No. ER18-2358-001. In GridLiance's response to Xcel's protest, GridLiance stated that it did not oppose Xcel's request to

³ SPP, Tariff, Attachment H, Addendum 43.

⁴ *S. Cent. MCN LLC*, 154 FERC ¶ 61,174 (2016).

⁵ SPP Tariff, Attachment AI (Transmission Facility Criteria and Pre-Filing Review Process) (1.0.0).

⁶ *Sw. Power Pool, Inc.*, Opinion No. 535, 149 FERC ¶ 61,051, at P 16 (2014).

⁷ GridLiance 2020 Annual Update at 4.

⁸ GridLiance transferred functional control of the Upgraded Oklahoma Assets to SPP on November 1, 2018.

⁹ *Sw. Power Pool, Inc.*, 165 FERC ¶ 61,066 (2018).

consolidate the proceedings.¹⁰ GridLiance requested that, if consolidated, the Commission clarify that the only issue being consolidated is whether the Upgraded Oklahoma Assets meet the definition of Transmission Facilities under Attachment AI and not whether the facilities must also meet the Commission's seven-factor test.¹¹ The Commission found that Xcel's formal challenge to GridLiance's 2019 Annual Update raised issues of material fact and established hearing and settlement judge procedures and consolidated Docket Nos. ER18-2358-001 and ER19-1357-000.¹²

5. In the October 2019 Order, the Commission clarified that, in the event that the Upgraded Oklahoma Assets fail to meet the definition of Transmission Facilities under Attachment AI, the Upgraded Oklahoma Assets could be included in SPP transmission rates if they meet the Commission's seven-factor test. The Commission explained that it previously stated that, in regards to Attachment AI, the seven-factor test may be applied to determine whether any facility is a transmission facility, regardless of whether it is operated at, above, or below 60 kV, and that SPP would be required to honor such a determination. The Commission further explained that, in Opinion No. 535, the Commission stated that the seven-factor test may be applied in order to determine whether a facility is included as a Transmission Facility under Attachment AI.¹³

6. On July 9, 2020, the Presiding Administrative Law Judge in Docket Nos. ER18-2358-001 and ER19-1357-000 certified the following question to the Commission—does meeting the Attachment AI criteria in the SPP Tariff qualify facilities as “Transmission” for

¹⁰ *GridLiance High Plains LLC*, 169 FERC ¶ 61,021, at P 10 (2019) (October 2019 Order).

¹¹ To determine what facilities would be under the Commission's jurisdiction and what facilities would remain under the state's jurisdiction for purposes of retail stranded cost adders or other retail regulatory purposes in the context of unbundled retail wheeling, in Order No. 888, the Commission developed a seven-factor test to determine what facilities are transmission facilities and what facilities are local distribution facilities. *Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities*, Order No. 888, FERC Stats. & Regs. ¶ 31,036 (1996) (cross-referenced at 75 FERC ¶ 61,080), *order on reh'g*, Order No. 888-A, FERC Stats. & Regs. ¶ 31,048 (cross-referenced at 78 FERC ¶ 61,220), *order on reh'g*, Order No. 888-B, 81 FERC ¶ 61,248 (1997), *order on reh'g*, Order No. 888-C, 82 FERC ¶ 61,046 (1998), *aff'd in relevant part sub nom. Transmission Access Policy Study Group v. FERC*, 225 F.3d 667 (D.C. Cir. 2000), *aff'd sub nom. New York v. FERC*, 535 U.S. 1 (2002).

¹² October 2019 Order, 169 FERC ¶ 61,021 at P 20.

¹³ *Id.* P 22.

purposes of Commission jurisdiction and inclusion in the SPP Tariff and thereby eliminate any need to analyze the facilities under the Commission's seven-factor test?¹⁴ The Commission answered "no," explaining that that the seven-factor test may be applied either to classify or declassify any facility as a Transmission Facility under Attachment AI.¹⁵

7. The proceedings in Docket Nos. ER18-2358-0001 and ER19-1357-000 are pending.¹⁶

II. 2020 Annual Update

8. On March 16, 2020, pursuant to the requirements of GridLiance's Formula Rate protocols, GridLiance filed its 2020 Annual Update, which includes, among other things, the costs of the Upgraded Oklahoma Assets. According to GridLiance's populated Formula Rate template, its ATRR for the Upgraded Oklahoma Assets in SPP Zone 11 is \$13,563,800.¹⁷

9. GridLiance states that Xcel submitted an informal challenge to GridLiance's projected 2020 Annual Update, which included Xcel's concerns about new facility upgrades and existing facilities that are not otherwise included in the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000. GridLiance asserts that it responded to Xcel's informal challenge.¹⁸

III. Formal Challenge and Motion to Consolidate

10. Xcel states that it formally challenges GridLiance's 2020 Annual Update, including GridLiance's inclusion of the Upgraded Oklahoma Assets in its 2020 Annual Update for SPP Zone 11 transmission rates. Xcel asserts that its Formal Challenge relates only to those costs resulting from the inclusion of the Upgraded Oklahoma Assets

¹⁴ *Sw. Power Pool, Inc.*, 172 FERC ¶ 61,129, at P 1 (2020) (Order on Certified Question).

¹⁵ *Id.* PP 20, 24.

¹⁶ The hearing commenced on August 31, 2020.

¹⁷ GridLiance 2020 Annual Update at Attachment A, Attachment 1, page 2 (Projected Revenue Requirement Worksheet).

¹⁸ *Id.* at 7-8.

in SPP rates to the extent those costs are not already addressed in the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000.¹⁹

11. Xcel argues that GridLiance has not demonstrated that the Upgraded Oklahoma Assets are transmission facilities eligible for cost recovery under Attachment AI or the Commission's seven-factor test.²⁰ Xcel also alleges that the Upgraded Oklahoma Assets were not prudently constructed. Further, Xcel contends that GridLiance fails to demonstrate that the Upgraded Oklahoma Assets are necessary to mitigate reliability concerns, such as complying with North American Electric Reliability Corporation Reliability Standards.²¹

12. Xcel requests that the Commission consolidate this proceeding with the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000. Xcel argues that these proceedings involve common issues regarding whether GridLiance can recover the costs of the Upgraded Oklahoma Assets under the SPP Tariff. Xcel contends that consolidating these proceedings will promote greater administrative efficiency, ensure that any overlapping issues are addressed comprehensively and consistently, and is consistent with the outcome in the October 2019 Order where the Commission consolidated Xcel's formal challenge to GridLiance's 2019 Annual Update with the pending proceeding in Docket No. ER18-2358-001.²²

IV. Notice of Filing and Responsive Pleadings

13. Notice of GridLiance's 2020 Annual Update was published in the *Federal Register*, 85 Fed. Reg. 23,816 (Apr. 29, 2020), with interventions and protests due on or before May 7, 2020. Western Farmers Electric Cooperative (Western Farmers) filed a timely motion to intervene.

14. Notice of Xcel's Formal Challenge was published in the *Federal Register*, 85 Fed. Reg. 37,448 (June 16, 2020), with interventions and protests due on or before July 7, 2020. Edison Electric Institute (EEI) filed a timely motion to intervene. On July 7, 2020, GridLiance filed a response to Xcel's formal challenge. On July 20, 2020, GridLiance filed an answer opposing EEI's motion to intervene. On July 22, 2020, Xcel filed an answer to GridLiance's response. On July 29, 2020, EEI filed an answer to GridLiance's

¹⁹ Xcel Formal Challenge at 3.

²⁰ *Id.* at 12-17.

²¹ *Id.* at 17-20.

²² *Id.* at 10-11.

answer. On July 31, 2020, GridLiance filed an answer to Xcel's answer. On August 5, 2020, Xcel filed an answer to GridLiance's answer.

A. EEI's Motion to Intervene

15. EEI states that it is an association that represents investor-owned electric companies in the United States. EEI asserts that its membership includes electric companies that operate in SPP and that are parties to and affected by this proceeding. According to EEI, because the Commission's actions in this proceeding will directly affect its members, EEI is an interested party. EEI also states that it and its members provide a broad-based perspective on the issue raised in the proceeding that cannot be adequately represented by any other party.²³

1. GridLiance Answer in Opposition

16. GridLiance opposes EEI's motion to intervene, arguing that EEI fails to meet the requirements of Rule 214 of the Commission's Rules of Practice and Procedure.²⁴ GridLiance argues that Rule 214 allows intervention for a movant that has or represents an interest which may be directly affected by the outcome of the proceeding and that direct interests include an interest as a consumer, customer, competitor, or a security holder of a party. GridLiance contends that EEI is not a consumer, customer, competitor, or a security holder of GridLiance. GridLiance also contends that EEI does not take transmission service in SPP Zones 10 or 11, the zones in which GridLiance's projected ATRR at issue here is recovered through SPP rates.²⁵ According to GridLiance, EEI is also not a stakeholder under GridLiance's Formula Rate protocols that govern its 2020 Annual Update at issue here.²⁶

17. GridLiance alleges that the Commission has permitted a trade association to intervene if it demonstrates that its members have an interest that may be directly affected by the outcome of the proceeding.²⁷ GridLiance contends, however, that broad statements that members are affected by the proceeding are not sufficient and the possible precedential effect of a Commission determination normally is not, by itself, a basis for intervention. GridLiance argues that EEI has not demonstrated that any of its members,

²³ EEI Motion to Intervene at 1.

²⁴ 18 C.F.R. § 385.214.

²⁵ GridLiance July 20 Answer at 2.

²⁶ *Id.* at 3-4.

²⁷ *Id.* at 2.

other than Xcel, which is a party to this proceeding, have any direct interest in this proceeding. GridLiance alleges that, as such, EEI's interests are adequately represented by Xcel and that there is nothing that EEI could contribute that Xcel cannot address in its own pleadings.²⁸

18. In addition, GridLiance argues that EEI has not made a showing that its participation is in the public interest. GridLiance contends that EEI's motion to intervene does not include any statement that its participation is in the public interest. GridLiance also asserts that the scope of this proceeding is limited to GridLiance's 2020 Annual Update and does not involve transmission pricing or policy in any region beyond SPP. GridLiance alleges that there is no need for a broad-based policy perspective here.²⁹

2. EEI Answer

19. EEI argues that it has a direct interest in this proceeding. EEI contends that Xcel is a member of EEI and that Xcel raised arguments in this proceeding that will have implications for Xcel and may have implications for other EEI members that have transmission formula rates.³⁰

20. EEI alleges that its participation in this proceeding is in the public interest. EEI contends that the Commission's policymaking is sounder and more defensible when it is informed by the broadest range of input available. EEI argues that its participation is in the public interest because EEI would provide a unique industry perspective with respect to the issues Xcel rates in its Formal Challenge. Finally, EEI alleges that when a timely intervention is filed, the Commission should permit EEI to participate in individual adjudications involving its members.³¹

B. Xcel's Formal Challenge

1. Response

21. GridLiance argues that the issues in Xcel's Formal Challenge are the same as those already set for hearing in the pending proceedings in Docket Nos. ER18-2358-001

²⁸ *Id.* at 2-3.

²⁹ *Id.* at 4-5. GridLiance also notes that the Presiding Judge in the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000 denied EEI's motion to intervene out-of-time on July 2, 2020. *Id.* at 5-6.

³⁰ EEI Answer at 2-3.

³¹ *Id.* at 3-4.

and ER19-1357-000 and consequently should be dismissed as duplicative.³² GridLiance contends that the only new transmission project included in its 2020 Annual Update is the Jefferson-to-Cole OPGW Project. GridLiance alleges that because Xcel's Formal Challenge relates to the facilities used to calculate GridLiance's 2020 Annual Update to the extent not already addressed in Docket Nos. ER18-2358-001 and ER19-1357-000, whether the facilities are eligible to be recovered under SPP's Tariff will be determined by the outcome of those pending proceedings.³³ In addition, GridLiance argues that the Commission should dismiss Xcel's Formal Challenge because Xcel makes unsupported allegations that the Upgraded Oklahoma Assets are not eligible for cost recovery under the SPP Tariff and Xcel has not raised a serious doubt regarding the prudence of GridLiance's reliability upgrades.³⁴

22. GridLiance contends that if the Commission does not dismiss Xcel's Formal Challenge, the Commission should deny Xcel's motion to consolidate. GridLiance asserts that, while there are common issues of law and fact with Xcel's Formal Challenge and the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000, consolidation will not result in greater administrative efficiency due to the late stage of the procedural schedule in those pending proceedings. GridLiance argues that the Commission has rejected a request to consolidate proceedings on the grounds that consolidation may inject unnecessary delay into the pending hearing.³⁵ GridLiance also asserts that the Chief Administrative Law Judge has rejected motions to consolidate proceedings on the grounds that it would not serve the goals of administrative efficiency and avoidance of undue delay.³⁶ Alternatively, GridLiance alleges that Xcel's formal challenge should be held in abeyance pending the outcome of those pending proceedings.³⁷

23. In addition, GridLiance requests that the Commission clarify that the Commission's seven-factor test is not required if facilities otherwise meet the Attachment AI criteria under the SPP Tariff. GridLiance states that it requests this clarification only

³² GridLiance Response at 22.

³³ *Id.* at 7-8.

³⁴ *Id.* at 8-11.

³⁵ *Id.* at 11 (citing *Fla. Power & Light Co.*, 24 FERC ¶ 61,171, at 61,408 (1983) (*FPL*)).

³⁶ *Id.* at 11-14.

³⁷ *Id.* at 11, 14.

to the extent that the Commission does not address it in an order on the certified question in Docket Nos. ER18-2358-001 and ER19-1357-000.³⁸

2. Answers

24. Xcel argues that its 2020 Formal Challenge is not duplicative because it addresses GridLiance's facilities, the costs for which GridLiance proposes to recover for the first time. Xcel contends that GridLiance's 2020 Annual Update shows that GridLiance's ATRR has increased over time to \$17,750,613 and at least some of the facilities were not included in GridLiance's initial request in Docket No. ER18-2358 or in its 2019 Annual Update in Docket No. ER19-1357-000.³⁹

25. Xcel argues that because most of the facilities at issue here are the same as those at issue in the pending proceedings, there is enough time to incorporate GridLiance's 2020 Annual Update into those pending proceedings. Further, Xcel requests that the Commission clarify that the hearing scheduled in those pending proceedings will cover all aspects of the initial filings in those cases, as well as GridLiance's Formula Rate inputs for 2020 that are subject to Xcel's Formal Challenge here.⁴⁰

26. Xcel also disagrees with GridLiance's arguments related to the application of the Commission's seven-factor test and Attachment AI.⁴¹

27. In its answer to Xcel's answer, GridLiance argues that Xcel uses incorrect figures to support its assertions that GridLiance's ATRR has increased over time. GridLiance contends that the \$17,750,613 ATRR amount is the total ATRR under the SPP Tariff and includes facilities from Zones 10, 11, and 14.⁴² GridLiance also disagrees with Xcel's arguments regarding the Commission's seven-factor test and Attachment AI.⁴³

³⁸ *Id.* at 4, 14-22.

³⁹ Xcel July Answer at 2.

⁴⁰ *Id.* at 20-22.

⁴¹ *Id.* at 6-20.

⁴² GridLiance July 31 Answer at 7-8.

⁴³ *Id.* at 2-7.

28. In its answer to GridLiance's answer, Xcel disagrees with GridLiance's counterarguments regarding the Commission's seven-factor test and Attachment AI.⁴⁴

V. Discussion

A. Procedural Matters

29. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2020), the timely, unopposed motion to intervene of Western Farmers serves to make it a party to this proceeding. Notwithstanding GridLiance's opposition to EEI's motion to intervene, we find that good cause exists to grant EEI's motion. We are satisfied that EEI has expressed an interest in the outcome of this proceeding that is not represented by any other party, and that EEI's participation may be in the public interest.⁴⁵ Accordingly, we grant EEI's motion to intervene.

30. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2020), prohibits an answer to a protest or an answer unless otherwise ordered by the decisional authority. We accept Xcel's, GridLiance's, and EEI's answers because they have provided information that assisted us in our decision-making process.

B. Substantive Matters

31. We find that Xcel's Formal Challenge raises issues of material fact that cannot be resolved based on the record before us and that are more appropriately addressed in the hearing and settlement judge procedures ordered below.

32. We disagree with GridLiance that Xcel's Formal Challenge is duplicative and should be dismissed. As explained by GridLiance, its 2020 Annual Update includes the costs of the Jefferson-to-Cole OPGW Project, which GridLiance seeks to recover for the first time here.⁴⁶ Therefore, while the issues in Xcel's Formal Challenge are the same as those already set for hearing in the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000, the costs of the facilities GridLiance seeks to recover for the first time here are different than the costs at issue in those other proceedings.

33. We also disagree with GridLiance that Xcel's motion to consolidate should be denied given the late stage of the pending proceedings. GridLiance cites to *FPL*, arguing that the Commission rejected a request to consolidate proceedings on the grounds that

⁴⁴ Xcel August Answer at 2-5.

⁴⁵ See *Ass'n of Bus. Advocating Tariff Equity v. Midcontinent Indep. Sys. Operator, Inc.*, 149 FERC ¶ 61,049, at P 177 (2014).

⁴⁶ GridLiance Response at 8-11.

consolidation may inject unnecessary delay into a pending hearing. However, GridLiance fails to acknowledge that the Commission denied the request for consolidation in *FPL* because the Commission believed that the proceeding may have involved more issues than the only one set for hearing and that consolidation may have injected unnecessary delay into the pending hearing.⁴⁷ Here, GridLiance acknowledges that the issues in Xcel's Formal Challenge are the same as those already set for hearing in the pending proceedings in Docket Nos. ER18-2358-001 and ER19-1357-000.⁴⁸ Unlike *FPL*, there are no additional issues in Xcel's Formal Challenge that would inject unnecessary delay into the pending proceedings, which are in their early stages. We therefore grant Xcel's motion to consolidate the proceedings for purposes of settlement, hearing, and decision. Further, as ordered below, the Presiding Judge will determine the procedures best suited to accommodate the consolidation, which will promote administrative efficiency. We also note that this outcome is consistent with the October 2019 Order, where the Commission found that Xcel's formal challenge to GridLiance's 2019 Annual Update raised an issue of material fact, set it for hearing and settlement judge procedures, and consolidated it with the pending proceeding in Docket No. ER18-2358-001.

34. We find that GridLiance's request for clarification is moot. The Commission addressed GridLiance's request in the Order on Certified Question.⁴⁹

35. In response to Xcel's request for clarification, we clarify that the issues set for hearing and settlement judge procedures include SPP's proposed Tariff revisions in Docket No. ER18-2358-001, Xcel's Formal Challenge to GridLiance's 2019 Annual Update in Docket No. ER19-1357-000, and Xcel's Formal Challenge to GridLiance's 2020 Annual Update here.

The Commission orders:

(A) Pursuant to the authority contained in and subject to the jurisdiction conferred upon the Federal Energy Regulatory Commission by section 402(a) of the Department of Energy Organization Act and by the Federal Power Act, particularly section 205 thereof, and pursuant to the Commission's Rules of Practice and Procedure and the regulations under the Federal Power Act (18 C.F.R. Chapter I), a public hearing shall be held in Docket No. ER20-1313-000 concerning Xcel's Formal Challenge to

⁴⁷ *FPL*, 24 FERC at 61,408. The Presiding Judge later recommended consolidating the proceedings after finding that the additional issues had become moot. *See Fla. Power & Light Co.*, 24 FERC ¶ 63,222 (1983).

⁴⁸ GridLiance Response at 22.

⁴⁹ Order on Certified Question, 172 FERC ¶ 61,129 at PP 20-26.

GridLiance's 2020 Annual Update. However, the hearing shall be held in abeyance to provide time for settlement judge procedures, as discussed in Ordering Paragraph (C) below.

(B) Docket Nos. ER18-2358-001, ER19-1357-000, and ER20-1313-000 are hereby consolidated for purposes of settlement, hearing, and decision.

(C) The Presiding Judge (or settlement judge, as appropriate) designated in Docket Nos. ER18-2358-001 and ER19-1357-000 shall determine the procedures best suited to accommodate the consolidation ordered herein.

(D) Given that the circumstances caused by the COVID-19 pandemic may disrupt, complicate, or otherwise change the ability of participants to engage in normal hearing procedures, the Chief Judge is hereby authorized to set or change the dates for the commencement of the hearing and the issuance of the initial decision as may be appropriate.

By the Commission.

(S E A L)

Kimberly D. Bose,
Secretary.