

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2016-2580030
Office of Consumer Advocate	:	C-2017-2585510
Office of Small Business Advocate	:	C-2017-2589092
Michael Ochs	:	C-2017-2596537
	:	
v.	:	
	:	
UGI Penn Natural Gas, Inc.	:	

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**STATEMENT OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND  
ENERGY EFFICIENCY IN PENNSYLVANIA (CAUSE-PA) IN SUPPORT OF THE  
JOINT PETITION FOR APPROVAL OF SETTLEMENT OF ALL ISSUES**

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The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), one of the signatory parties to the Joint Petition for Approval of Settlement of All Issues (Joint Petition or Settlement), respectfully requests that the terms and conditions of the Settlement be approved by the Honorable Mary D. Long, Administrative Law Judge, and the Pennsylvania Public Utility Commission (Commission). For the reasons stated more fully below, CAUSE-PA believes that the terms and conditions of the Settlement are in the public interest and should be approved.

**I. INTRODUCTION**

CAUSE-PA intervened in this proceeding to address, among other issues, whether the proposed rate increase would detrimentally impact the ability of low-income natural gas customers within the UGI Penn Natural Gas (UGI or the Company) service territory to access service under reasonable terms and conditions.

In relevant part, the Settlement increases residential rates by 5.7% (Joint Pet. at ¶ 27), the majority of which will be recovered through the company's volumetric charge. The fixed charge portion of the residential rate structure will increase from \$13.17 to \$13.25 – far less than the proposed \$18.50 charge. (Joint Pet. at ¶ 28; see also CAUSE-PA St. 1 at 6; UGI St. 7 at 21). The Settlement also provides that UGI will increase funding for its Low Income Usage Reduction Program (LIURP) by 5.7% (\$48,450) annually, an increase equal to the overall percentage increase for the residential rate class. (Joint Pet. at ¶ 39). In addition to this LIURP budget increase, UGI PNG also agrees to dedicate an additional \$150,000 each year to LIURP programming for each year that its EE&C Plan is in place, to offset the lack of dedicated low income programming in UGI PNG's proposed Energy Efficiency and Conservation (EE&C) Plan. (Joint Pet. at ¶ 36). \$100,000 of this funding will be recovered through the EE&C Rider, and \$50,000 will be recovered through the Universal Service Plan (USP) Rider. (Joint Pet. at ¶ 36). UGI PNG further agrees to begin a furnace repair or replacement program, and will set aside \$150,000 annually from its general LIURP budget to fund the new initiative. (Joint Pet. at ¶ 43). And, to remediate the impact of a sharply increased reconnection fee (\$37.00 to \$73.00), UGI PNG agrees to allow Hardship Funds to be used to pay reconnection fees, regardless of whether the low income customer was enrolled in CAP. (Joint Pet. at ¶ 46). Finally, the Settlement provides numerous improvements to UGI's policies and procedures for its universal service programs to ensure equal access and streamlined enrollment. (See Joint Pet. at ¶¶ 38-47).

Although CAUSE-PA's positions in litigation were not fully adopted, the Settlement was arrived at through good faith negotiation by all parties. The Settlement is in the public interest in that it (1) addresses the ability of low income natural gas customers in UGI PNG's service territory to access safe and affordable natural gas service, (2) balances the interests of the parties,

and (3) fairly resolves a number of important issues raised by CAUSE-PA and other parties. If the Settlement is approved, the parties will also avoid the considerable cost of further litigation and/or appeals.

## II. STANDARD FOR APPROVAL OF SETTLEMENT

The Commission’s regulations lend unambiguous support for settlements, and declare: “It is the policy of the Commission to encourage settlements.”<sup>1</sup> The Commission has also set explicit policy guiding settlement of a major rate case, explaining in its codified statement of policy that “the results achieved from a negotiated settlement or stipulation, or both, in which the interested parties have had an opportunity to participate are often preferable to those achieved at the conclusion of a fully litigated proceeding.”<sup>2</sup> Settlements are preferred because they “lessen the time and expense that Parties must expend litigating a case and, at the same time, conserve resources.”<sup>3</sup> In reviewing whether to approve a proposed settlement, the Commission must determine whether the terms and conditions are in the interest of the public based on a preponderance of the evidence “showing a likelihood or probability of public benefits that need not be quantified or guaranteed.”<sup>4</sup> Historically, the Commission has defined the public interest as inclusive of ratepayers, shareholders, and the regulated community at large.<sup>5</sup> Of course, proposed settlement terms must also be consistent with applicable law.<sup>6</sup>

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<sup>1</sup> 52 Pa. Code § 5.231.

<sup>2</sup> 52 Pa. Code § 69.401.

<sup>3</sup> See Commonwealth of Pa. et al. v. IDT Energy, Inc., Docket No. C-2014-2427657, at 35-37 (Tentative Order entered June 30, 2016).

<sup>4</sup> See id. (quoting Popowsky v. Pa. PUC, 594 Pa. 583, 937 A.2d at 1040 (2007)).

<sup>5</sup> See id. (citing Pa. PUC v. Bell Atlantic Pennsylvania, Inc., Docket No. R-00953409 (Order entered Sept. 29, 1995)).

<sup>6</sup> See id. (citing Dauphin County Indus. Dev. Auth. v. Pa. PUC, 2015 Pa. Commw. LEXIS 381 (Sept. 9, 2015)).

### **III. THE SETTLEMENT IS IN THE PUBLIC INTEREST**

#### **A. GENERAL**

Mr. Mitchell Miller, expert witness for CAUSE-PA, explained in his testimony: “[a]s a matter of sound public policy, rate affordability must be fully considered in determining whether a rate proposal is just and reasonable within a given service territory.” (CAUSE-PA St. 1 at 11; CAUSE-PA St. 1-SR at 3). As it stands, “low income consumers already face extraordinary levels of unaffordability, often paying over 30% of their monthly household income on energy costs alone.” (CAUSE-PA St. 1 at 7-17; CAUSE-PA St. 1-SR at 3). Increased rates will further exacerbate that unaffordability, “leaving more Pennsylvanians unable to reasonably access natural gas service to power central heating systems, water heaters, and stoves – the basic and essential services which make homes inhabitable.” (CAUSE-PA St. 1-SR at 3).

The Joint Settlement takes rate affordability into account by using structural rate design to limit the disproportionate burdens on low income households and by providing common-sense enhancements to available universal service programs. These enhancements will better match needy households with available assistance and ensure access to stable and affordable utility services over the long term. These terms, and the reasons each are in the public interest, are discussed in further depth below.

#### **B. REVENUE REQUIREMENT**

CAUSE-PA did not take a position in this proceeding on the revenue requirement, or the components thereof, except to explain the detrimental impact of any increase in the Company’s revenue requirement on low income residential consumers generally. CAUSE-PA focused its case on the need to appropriately remediate any resultant increase in the Company’s residential distribution rates through equitable rate design and the adoption of enhancements to available

universal service programming. Rate design and universal service enhancements are discussed below.

**C. REVENUE ALLOCATION/RATE DESIGN**

**1. Revenue Allocation**

CAUSE-PA did not take a position in this proceeding on revenue allocation.

**2. Rate Design**

**a. Rate R/RT**

Paragraph 28 sets the residential customer charge, or fixed monthly service charge, at \$13.25 per month, a small increase from its current \$13.17 per month fixed charge. (CAUSE-PA St. 1 at 19). This proposed increase is much lower than UGI’s proposed \$18.50 fixed monthly service charge. As CAUSE-PA’s expert witness Mr. Mitchell Miller explained in direct testimony, “[i]ncreased fixed charges are exceptionally harmful to low-income customers.” (CAUSE-PA St. 1 at 19). Increasing the fixed monthly service charge limits customers’ ability to reduce bills through conservation and consumption reduction, and undermines the goals of the Low Income Usage Reduction Program (LIURP). (CAUSE-PA St. 1 at 19-20). High fixed fees also disproportionately impact low income consumers, who use less natural gas than their higher income counterparts. (CAUSE-PA St. 1 at 19-20; CAUSE-PA St. 1-SR at 6-8). If the fixed portion of a bill is high, those in smaller homes and apartments (which are more likely to be occupied by low income families) will pay a disproportionate share of the distribution costs. The Joint Settlement is in the public interest because it limits the proportional increase in the amount recovered through the fixed charge portion of the customer’s bill – thereby protecting against inappropriate cost-shifting onto vulnerable low income households.

**b. Rate N/NT**

CAUSE-PA did not take a position on the rate design for Rate N/NT.

**c. Rate DS**

CAUSE-PA did not take a position on the rate design for Rate DS.

**d. Rate LFD**

CAUSE-PA did not take a position on the rate design for Rate LDF.

**3. Technology and Economic Development Rider**

CAUSE-PA did not take a position on the Technology and Economic Development Rider.

**D. ENERGY EFFICIENCY AND CONSERVATION PLAN**

**1. Allocation of New Construction Program Budget**

CAUSE-PA did not take a position on New Construction Program Budget.

**2. Nonresidential Program Spending**

CAUSE-PA did not take a position on Non-Residential Program Spending.

**3. Incentive to Reach EE&C Targets**

CAUSE-PA did not take a position on incentives to reach EE&C targets.

**4. Low-Income Issues**

As proposed, UGI's energy efficiency and conservation plan (EE&C Plan) did not include any targeted low income programming. Without targeted low income programming, low income households would not have equitable access to the programs. As Mr. Miller explained in direct testimony: "[t]he vast majority of low income customers (those not enrolled in CAP) will pay UGI's proposed 'EE&C Rider' ... But as a practical matter, given the inelasticity of household income for those living in poverty discussed at length above, low income customers are unable to meaningfully participate in the EE&C programming to derive comprehensive and quantifiable savings." (CAUSE-PA St. 1 at 37). The only programming within UGI's proposed EE&C portfolio which is potentially accessible to low income households – home energy reports – have

proven to yield very low savings which are quickly eroded as soon as the program ends. (CAUSE-PA St. 1-SR at 20).<sup>7</sup>

Importantly, UGI's Low Income Usage Reduction Program (LIURP) – a required universal service program<sup>8</sup> – is not a substitute for targeted low income programming within UGI's *voluntary* EE&C Plan. As Mr. Miller explained:

UGI modeled its proposed EE&C programming on Act 129 energy efficiency and conservation programming, but completely ignored a major component of Act 129: The recognition that low income customers are unable to access most residential programs because the upfront cost of participation is prohibitive. In Phase III of Act 129 – which launched June 1, 2016 – the Commission required electric companies create programming for low income customers capable of producing 5.5% of its overall savings. This is in addition to EDCs required LIURP programming.

(CAUSE-PA St. 1 at 36; see also CAUSE-PA St. 1-SR at 19-20).

UGI had initially proposed to only address low income energy efficiency needs through a referral process, whereby *self-identified* low income customers inquiring about residential EE&C programming would be provided a referral to apply for LIURP services – without any consummate increase in funding for additional LIURP services. Mr. Miller explained that UGI's referral process was insufficient to connect households to an appropriate and affordable energy efficiency program – pointing to the absence of any referrals to LIURP through the recently launched UGI Gas EE&C Plan. (CAUSE-PA St. 1 at 37-38).

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<sup>7</sup> Mr. Miller explained in direct testimony that the true benefit of home energy reports is not the savings – which are relatively low and short-lived – but in driving participation to other programs, which low income customers are unable to reasonably take advantage of, given they lack upfront capital needed to invest.

The only program within UGI's EE&C program that Mr. Love can cite as being accessible to low income households is the behavior and education program. But behavioral based programs do not produce appreciable savings for households that cannot also invest in comprehensive usage reduction and energy efficiency measures. A recent study of home energy report programs revealed that personalized educational reports achieve savings between 1.5% and 2.5% annually, provided the programs are ongoing. After the program stops, and customers no longer receive reports, the marginal savings achieved will erode quickly and continuously over time. Indeed, the true value in providing targeted home energy education is to encourage households to adopt comprehensive, long-term savings measures, which low income households are most often unable to afford.

CAUSE-PA St. 1-SR at 19-20.

<sup>8</sup> See 52 Pa. Code Ch. 58 (Residential Low Income Usage Reduction Programs).

Paragraphs 36 and 37 of the Joint Settlement are targeted to address and remediate UGI's lack of dedicated low income programming within its voluntary EE&C Plan through increased funding and improved referral processes. First, paragraph 36 dedicates \$150,000 for targeted low income energy efficiency programming, the majority of which (\$100,000) will be recovered through the EE&C Rider to ensure equitable access to energy efficiency services. The targeted programming will be administered through UGI's LIURP, but represents a separate and distinct funding allocation that is above and beyond the general LIURP budget. Enhanced financing for low income programming for the duration of UGI's voluntary EE&C Plan ensures that low income households are not required to shoulder the costs of the voluntary EE&C program without access to the primary benefits of comprehensive energy reduction.

Second, paragraph 37 enhances outreach, information, and access to low income energy efficiency programming. UGI will update marketing materials and program applications to more explicitly inform customers applying for general residential programming that they may be eligible for free energy reduction services through LIURP if they are income eligible. This provision helps to better match consumers to appropriate energy efficiency and conservation programming, and ensures that low income customers are better informed about and able to access energy efficiency and conservation services.

Overall, in addition to promoting equity in the delivery of voluntary EE&C program benefits, the increased funding and enhanced outreach and referrals for low income energy efficiency programming contained in paragraphs 36 and 37 of the Joint Settlement will ensure that low income consumers are better able to offset the impact of high energy costs through conservation and usage reduction.



## **E. UNIVERSAL SERVICES**

While UGI had initially proposed to adopt a number of universal service program enhancements from its recent UGI Gas base rate proceeding, CAUSE-PA’s expert witness, Mr. Miller, explained that these provisions were insufficient on their own to resolve significant and substantial concerns about the continued affordability of natural gas service in UGI PNG’s service territory, and the corresponding need for assistance, if a rate increase were approved. (CAUSE-PA St. 1 at 25-31). As Mr. Miller pointed out, “UGI has the lowest CAP enrollment rates compared to other NGDCs. It also has much higher than average termination rate and much lower than average corresponding reconnection rate compared to other Pennsylvania NGDCs.” (CAUSE-PA St. 1 at 11, 14-18, 25). The additional universal service program enhancements contained within this Joint Settlement are therefore critical to ensure that low income consumers are insulated from the potentially severe financial consequences of a rate increase on this uniquely vulnerable population. (CAUSE-PA St. 1 at 7-18; 25).

### **1. CAP Enrollment**

As Mr. Miller explained in his direct testimony, the vast majority of UGI’s low income customers are not enrolled in CAP. As such, those customers are likely to be negatively impacted by the increase in rates. UGI’s CAP enrollment levels are already low compared to other NGDCs – while its low income termination rates are high – signaling a distinct and immediate need to bolster CAP enrollment to meet the needs of UGI’s low income population. (CAUSE-PA St. 1 at 10-12; 16-17; 31-32).<sup>9</sup> If left unaddressed, the pending rate increase combined with UGI’s CAP

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<sup>9</sup> Mr. Miller explained:

UGI’s CAP enrollment is, and has historically been, much lower than the average CAP enrollment of other Natural Gas Distribution Companies (NGDCs). In my opinion, as I will discuss in further detail later in my testimony, UGI’s uniquely low CAP rate signals a need for policy and procedure changes to mitigate UGI’s chronic CAP under-enrollment.

...

under-enrollment is likely to lead to increase terminations and resulting uncollectible expenses, and could have substantial impacts on the health, safety, and welfare of families and communities within UGI's service territory. (CAUSE-PA St. 1 at 17).

To remediate CAP under-enrollment, and to better ensure equitable access to natural gas service in light of UGI's rate increase, the Joint Settlement contains a number of provisions designed to make it easier for low income customers to be referred to and enroll in CAP. First, in paragraph 40, the Joint Settlement requires UGI to allow consumers to apply for CAP over the phone, and provide supportive documentation "through the mail or other means (including but not limited to fax, email, or text messaging)." (Joint Pet. at ¶ 40)<sup>10</sup>. In-person enrollment at a local CBO will remain an option for those who choose to apply in person. The shift to phone-based enrollment will allow enrollment in CAP for low income customers who are unable to secure transportation, time off work, and/or childcare to attend in-person enrollment appointments at the local CBO.

In addition to diversifying enrollment options, paragraph 45 of the Joint Settlement also advances efforts to improve outreach to potentially eligible low income consumers. Pursuant to the Settlement, UGI will propose a plan in its next Universal Service and Energy Conservation Plan (USECP) to bolster outreach efforts by providing CBOs with customer lists to enable targeted outreach to potentially income eligible customers. To balance consumer privacy interests, UGI will allow consumers to opt-out of inclusion in the list through the "general opt-out option on the Customer Information System portal and by information printed on bills." (Joint Pet. at ¶ 45).

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[T]he vast majority (between 75-89% of low income customers in UGI PNG's service territory) are not enrolled in CAP, and are unable to reduce their energy burdens to even that of CAP participants, let alone middle income households. Compared to both average residential customers and low income CAP customers, low income customers who are not enrolled in CAP have significantly higher energy burdens. (CAUSE-PA St. 1 at 10, 12).

<sup>10</sup> The type of alternative communication available to CAP applicants may vary based on the available technology at the local Community Based Organization (CBO) which operates in the given geographic area.

Enhanced outreach directly to the eligible population, through local and trusted CBOs, will help ensure that low income consumers are reaching critical assistance to protect their access to safe, affordable natural gas services – while protecting the consumer’s right to privacy.

These CAP enhancements serve a clear public purpose and are in the public interest, as they ensure that – notwithstanding the rate increase – low income customers will be afforded equitable access to safe, stable, and affordable natural gas services. As such, these provisions should be approved as part of the comprehensive Joint Settlement.

## **2. LIURP Budget**

The Low Income Usage Reduction Program (LIURP) provides comprehensive usage reduction services for low income households, and helps to control energy costs over the long-term – saving participating households an estimated 15.9% (or an average of \$26.42 per month). (CAUSE-PA St. 1 at 33). Mr. Miller noted that UGI’s current LIURP funding is “woefully inadequate to meet the estimated need,”<sup>11</sup> and recommended that UGI increase its LIURP funding by an amount equal to the percentage of any approved increase in residential rates “to offset the impact of UGI’s proposed rate increase and rate design on financially vulnerable customers.” (CAUSE-PA St. 1 at 33-34). He explained that an increase in LIURP funding “will enhance the ability of low income customers to access assistance to control their energy costs and mitigate the impact of the proposed rate increase. In turn, it will help reduce the inevitable rise in uncollectible expenses that are likely to result if UGI is permitted to increase rates.” (CAUSE-PA at 33).

The Joint Settlement incorporates Mr. Miller’s proposal for increased LIURP funding in paragraph 39. The increase is separate and distinct from the enhanced LIURP funding discussed

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<sup>11</sup> “UGI estimates that approximately 7,238 customers are in need of LIURP services. Though, the number of eligible households is likely much higher, given over 10,000 low income households fall within the top 30% usage bracket. Nevertheless, even by UGI’s estimate, it would take 48 years to treat all 7,238 homes.” (CAUSE-PA St. 1 at 34).

above to remediate the lack of dedicated low income programming within UGI's EE&C Plan. In addition, UGI will roll over any unspent funds from its annual budget, and will add that amount to the funding available for LIURP services in future years. This increase in annual LIURP funding is squarely within the public interest, as it ensures that low income households are better able to access usage reduction services to reduce their energy burden, thereby offsetting the negative impact of a rate increase on this particularly vulnerable population.

### **3. LIURP Coordination and Furnace Repair/Replacement**

In addition to enhanced funding for LIURP, the Joint Settlement provides two other critical enhancements to LIURP services, which will better match consumers with important usage reduction services.

First, paragraph 43 provides that UGI include a limited furnace repair or replacement program in its next USECP to repair or replace inoperable furnaces for low income consumers within UGI's service territory. To advance this program, UGI will propose to waive the LIURP payback requirements for furnace repair or replacement; increase the per-job LIURP funding where furnace replacement is necessary; and request waiver of the high use requirement for furnace repair or replacement. UGI will set aside \$150,000 of its existing LIURP budget to fund the program each year. For the first two years, funds available for repair or replacement will roll over and be added to the budget for the next year. Thereafter, any roll-over funding will be reabsorbed into the general LIURP budget. The introduction of a furnace repair or replacement program will increase the health and safety of homes who would otherwise resort to unsafe and inefficient alternatives to heat their homes, such as electric space heaters or ovens. As such, it is squarely within the public interest, and should be approved as part of the comprehensive Joint Settlement.

The Joint Settlement also provides for two in-person collaborative meetings to discuss inter-utility coordination of LIURP services.<sup>12</sup> Importantly, there are many benefits to hosting a collaborative meeting of critical stakeholders – including regional EDCs, the state Weatherization Assistance Program, local CBOs, and the parties to this proceeding – to discuss coordination of usage reduction services. Mr. Miller explained the importance of bold coordination efforts:

Coordination requires active engagement by utilities to create shared applications, coordinated site visits, and appropriate cost-sharing. The ultimate goal is to reduce administrative costs, consolidate customer interactions, and share in costs to reduce overall spending without compromising the quality of services delivered. Indeed, it is burdensome for a low income consumer to meet multiple demands on their time from both electric and gas utilities – requiring them to take time off work, arrange child care, and allow contractors into their home for multiple visits to perform a range of services. Whenever possible, visits to a low income customer’s home should be consolidated and coordinated between utilities to ensure that work is done with as little impact to the customer’s work and family life. Likewise, it is needlessly costly to send contractors out on multiple visits to the same home to perform similar work. Streamlined services ensure that a single audit can take place, which assesses for both natural gas and electric usage reduction measures.

(CAUSE-PA St. 1-SR at 14-15). As Mr. Miller pointed out, to date, UGI’s coordination efforts have been insufficient to generate the economies of scale available through proper coordination of LIURP service delivery. The structured collaborative contained within the Joint Settlement represents a first step toward improving LIURP service delivery, and should be approved because it is squarely in the public interest to leverage additional low income programming while cutting costs.

#### **4. Reconnection Fees**

UGI’s sharp increase in reconnection fees – from \$37.00 to \$73.00 – poses a distinct risk of financial harm for low income households. (CAUSE-PA St. 1 at 23-24). As Mr. Miller

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<sup>12</sup> Notably, the furnace repair and replacement program will be on the agenda for these meetings, which will enable stakeholders to monitor the progress of the program and suggest improvements to help ensure program success.

explained, the increased reconnection fee “will have a disproportionately detrimental impact on low income customers, who are far more likely than non-low income customers to have their service involuntarily terminated.” (CAUSE-PA St. 1 at 23). After an involuntary termination, households face often insurmountable financial hurdles to reconnect to service. “Doubling the cost of reconnection will further threaten low income families’ ability to maintain utility service and, in turn, stable housing” – especially in UGI’s service territory, which already has higher than average termination rates and lower than average reconnection rates. (CAUSE-PA St. 1 at 23-24).

To remediate this disproportionately harmful impact – while ensuring reasonable recovery of UGI’s costs – paragraph 46 of the Joint Settlement provides that income eligible households will be able to access assistance through UGI’s Hardship Fund to pay for reconnection fees. This is a critically important provision to the health, safety, and general welfare of our communities, as it ensures that low income households will be able to reconnect to service without the added burden of a starkly increased reconnection fee. As such, this provision is in the public interest and should be approved.

#### **F. NATURAL GAS SUPPLIER ISSUES**

CAUSE-PA did not take a position in this proceeding on any of the Natural Gas Supplier Issues.

#### IV. CONCLUSION

CAUSE-PA submits that the Settlement, which the Joint Petitioners were able to negotiate after an extensive investigation of UGI's filing, is in the public interest. Acceptance of the Settlement avoids the necessity of further administrative and possible appellate proceedings regarding the settled issues at a substantial cost to the Joint Petitioners and UGI's customers. Accordingly, CAUSE-PA respectfully requests that the Honorable Mary D. Long and the Commission approve the Settlement.

Date: June 30, 2017

Respectfully submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
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**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al., :  
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 v. : Docket No. R-2016-2580030  
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 UGI Penn Natural Gas, Inc. :

**Certificate of Service**

I hereby certify that I have this day served copies of the **Statement of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) In Support of the Joint Petition for Approval of Settlement of All Issues** in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

**VIA FIRST CLASS MAIL AND/OR EMAIL**

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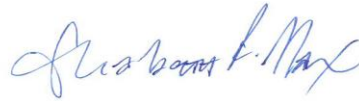
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June 30, 2017