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PUCO

Ohio Public Utility Commission
Docketing Division
180 East Broad Street
Columbus, OH 43215

April 12, 2017

RE: **Docket No. 17-0958-EL-ACP – Direct Energy Business Marketing, LLC's
Annual Renewable Portfolio Standards Compliance Filing for 2016**

Dear Commission:

Pursuant to RSP Rules 4901:1-40-05 OAC & 4901:1-40-03(C) OAC- regarding annual renewable portfolio standard reporting and filing, please find enclosed the executed compliance filing of Direct Energy Business Marketing, LLC.

If you should have questions regarding this filing, please do not hesitate to contact me directly.

Best Regards,

Barbara Farmer
Public Utility Commission of Texas

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician TM Date Processed **APR 13 2017**

Compliance Plan Status Report for Compliance Year 2016
Summary Sheet

	Sales Unadjusted (MWhs)	Proposed Adjustments (MWhs)	Sales Adjusted (MWhs)	Source of Sales Volume Data
2013		0	0	(A)
2014	560,522	0	560,522	Billing data (B)
2015	747,050	0	747,050	Billing data (C)

Baseline for 2016 Compliance Obligation (MWhs)

715,157

Not Adjusted

(D) = AvgABC

(Note: If using 2016 sales as your baseline, insert that figure in cell I14 and indicate in box to right if 2016 sales are adjusted or not.

i.e., Not Adjusted

For details on determining your compliance baseline, please refer to 4928.643, Ohio Revised Code (ORC), and 4901:1-40-03 of the Ohio Administrative Code (OAC).

Questions may also be posed to Staff at the following email address:

AEPS@puc.state.oh.us

2.50%

2016 Statutory Compliance Obligation

2016 Non-Solar Renewable Benchmark

2.38%

(E)

2016 Solar Renewable Benchmark

0.12%

(F)

Per R.C. 4928.64(B)(2)

2016 Compliance Obligation

Non-Solar RECs Needed for Compliance

17,021

(G) = (D) * (E)

Solar RECs Needed for Compliance

858

(H) = (D) * (F)

Carry-Over from Previous Year(s), if applicable

Non-Solar (RECs)

0

(I)

Solar (S-RECs)

0

(J)

Total 2016 Compliance Obligations

Non-Solar RECs Needed for Compliance

17,021

(K) = (G) + (I)

Solar RECs Needed for Compliance

858

(L) = (H) + (J)

2016 Performance (Per GATS and/or MRETS Data)

Non-Solar (RECs)

17,021

(M)

Solar (S-RECs)

858

(N)

Under Compliance in 2016, if applicable

Non-Solar (RECs)

0

(O) = (K) - (M)

Solar (S-RECs)

0

(P) = (L) - (N)

2016 Alternative Compliance Payments

Non-Solar, per REC (Refer to Case 15-0461-EL-ACP)

\$49.96

(Q)

Solar, per S-REC (Refer to R.C. 4928.64(C)(2)(a))

\$300.00

(R)

2016 Payments, if applicable

Non-Solar Total

\$0.00

(S) = (O) * (Q)

Solar Total

\$0.00

(T) = (P) * (R)

TOTAL

\$0.00

(U) = (S) + (T)

This compliance worksheet was developed by Staff for internal review purposes. However, it may be useful for your company in preparation of its RPS annual compliance status report for the 2016 compliance year. Your company is not required to include this form in its filing, but that is an option. If using this form, your company should insert data in the blue shaded boxes (as applicable). The remaining cells should auto-calculate. However, you should still independently verify the accuracy of the calculations. Questions concerning this worksheet can be addressed to Stuart.Siegfried@puc.state.oh.us

**COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
ALTERNATIVE ENERGY ANNUAL STATUS REPORT FOR CALENDAR YEAR 2016**

Direct Energy Business Marketing, LLC (hereinafter "DEBM") in accordance with Sections 4928.64 and 4928.65, Ohio Revised Code and Commission Rules 4901:1-40-03 and 4901:1-40-05 hereby submits this Alternative Energy Annual Status Report ("AER") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

1. Determination that an Alternative Energy Resource Report is Required (check one)

- ☒ During calendar year 2016 the CRES states that it conducted retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.
- ☐ During calendar year 2016 the CRES states that it did not conduct retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.

2. Determination of the sales baseline for 2016

- a. During the past three calendar years the CRES made retail sales of generation in the amounts shown below:

2013 MWh	
2014 MWh	560,522
2015 MWh	747,050

- b. The average annual sales of the active years listed above (sum of the active years' MWh / number of active years hereinafter "Baseline Sales")

751,157

- c. If conditions exist that merit an adjustment to the Baseline Sales please list the adjusted Baseline Sales and attach as an exhibit to this AER a full explanation of the reason(s) for the adjustment(s).

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- d. If the CRES was not active during calendar years 2013, 2014, and 2015 but did make sales during calendar year 2016, please project the amount of retail electric generation sales anticipated for the whole of calendar year 2016 as would have been projected on the first day retail generation sales were made in Ohio.

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3. Determination of the number of Solar and Total Renewable Energy Credits (RECs) Required and Statement of the Number of RECs Claimed

RENEWABLE ENERGY CREDITS REQUIRED AND OBTAINED FOR 2015				
Types	(A) No. of RECs Required	(B) No. of RECs Obtained	(C) Registry	(D) No. of RECs Sited in OH
Solar	858	858	GATS	858
Non Solar	17,021	17,021	GATS	0
Total	17,879	17,879	GATS	858

- a. Column A above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2016. The determinations were calculated by multiplying the:

☒	Baseline Sales
☐	Adjusted Baseline Sales
☐	Projected Sales

by 12 hundredths of one per cent (.12%) for Solar RECs, by two and 38 hundredths percent (2.38%) for Non-Solar RECs, and two and a half percent (2.5%) for total RECS. Total RECs include both Solar and Non Solar RECs.

- b. The CRES states that it has obtained in accordance with the Commission's Rules the number of Solar and Non Solar RECs listed in column B above for 2016.

Approved registry being used by the CRES: PJM-GATS

- c. The CRES states that of the RECs it has obtained for 2016 the number listed in column D represents the RECs with generation facilities sited within the state of Ohio.

CRES states that it has

☐	Received a force majeure determination for solar RECs
☐	Sought but has yet to receive a ruling on a force majeure determination for Solar RECs
☒	Did not seek and did not receive a force majeure determination for solar RECs

4. Compliance (check one)

the Ohio Long Term Forecast of Energy Requirements 2011-2031.
<http://www.puco.ohio.gov/emplibrary/files/util/UtilitiesDeptReports/OhioLTFEnergyReq2011-2030.pdf>

- d. Comments on any perceived impediment(s) to achieving compliance with the solar and non-solar REC requirements, as well as any discussion addressing such impediments. N/A

Compliance Plan Status Report for Compliance Year 2016
Summary Sheet

	Sales Unadjusted (MWhs)	Proposed Adjustments (MWhs)	Sales Adjusted (MWhs)	Source of Sales Volume Data	
2013		0	0		(A)
2014	560,522	0	560,522	Billing data	(B)
2015	747,050	0	747,050	Billing data	(C)
Baseline for 2016 Compliance Obligation (MWhs)			715,157	Not Adjusted	(D) = AvgABC

(Note: If using 2016 sales as your baseline, insert that figure in cell I14 and indicate in box to right if 2016 sales are adjusted or not.

I.e., Not Adjusted

For details on determining your compliance baseline, please refer to 4928.643, Ohio Revised Code (ORC), and 4901:1-40-03 of the Ohio Administrative Code (OAC).

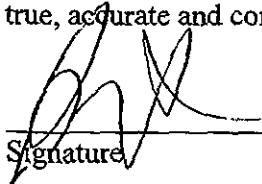
Questions may also be posed to Staff at the following email address:

AEPS@puc.state.oh.us

2.50%	2016 Statutory Compliance Obligation			
	2016 Non-Solar Renewable Benchmark	2.38%		(E)
	2016 Solar Renewable Benchmark	0.12%		(F)
	Per R.C., 4928.64(B)(2)			
	2016 Compliance Obligation			
	Non-Solar RECs Needed for Compliance	17,021		(G) = (D) * (E)
	Solar RECs Needed for Compliance	858		(H) = (D) * (F)
	Carry-Over from Previous Year(s), if applicable			
	Non-Solar (RECs)	0		(I)
	Solar (S-RECs)	0		(J)
	Total 2016 Compliance Obligations			
	Non-Solar RECs Needed for Compliance	17,021		(K) = (G) + (I)
	Solar RECs Needed for Compliance	858		(L) = (H) + (J)
	2016 Performance (Per GATS and/or MRETS Data)			
	Non-Solar (RECs)	17,021		(M)
	Solar (S-RECs)	858		(N)
	Under Compliance in 2016, if applicable			
	Non-Solar (RECs)	0		(O) = (K) - (M)
	Solar (S-RECs)	0		(P) = (L) - (N)
	2016 Alternative Compliance Payments			
	Non-Solar, per REC (Refer to Case 15-0461-EL-ACP)	\$49.98		(Q)
	Solar, per S-REC (Refer to R.C. 4928.64(C)(2)(a))	\$300.00		(R)
	2016 Payments, if applicable			
	Non-Solar Total	\$0.00		(S) = (O) * (Q)
	Solar Total	\$0.00		(T) = (P) * (R)
	TOTAL	\$0.00		(U) = (S) + (T)

This compliance worksheet was developed by Staff for internal review purposes. However, it may be useful for your company in preparation of its RPS annual compliance status report for the 2015 compliance year. Your company is not required to include this form in its filing, but that is an option. If using this form, your company should insert data in the blue shaded boxes (as applicable). The remaining cells should auto-calculate. However, you should still independently verify the accuracy of the calculations. Questions concerning this worksheet can be addressed to Stuart.Siegfried@puc.state.oh.us

I, Bray Dohrwardt, am the duly authorized representative of Direct Energy Business Marketing, LLC, and state, to the best of my knowledge and ability, all the information contained in the foregoing Competitive Retail Electric Service Provider Alternative Energy Annual Status Report for Calendar Year 2016, including any exhibits and attachments, are true, accurate and complete.



Signature

Name: Bray Dohrwardt
Title: Secretary
Company: Direct Energy Business Marketing, LLC

Direct Energy Business Marketing, LLC - My RPS Compliance - OH - Jan 2016 - Dec 2016

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Delete	Total Generation for Subaccount	OH Solar	OH Renewable	Total Certificates Used for RPS
Direct Energy Business Marketing, LLC	Default	AEP Ohio	304,695	278069		6,951	333	6,618	6,951
Direct Energy Business Marketing, LLC	Default	DEOK	322,736			0	0	0	0
Direct Energy Business Marketing, LLC	Default	FEOH	3,348,235	437088		10,928	525	10,403	10,928
Total			3,975,666			17,879	858	17,021	17,879

Direct Energy Business Marketing, LLC - Subaccount Details - OH - Jan 2016 - Dec 2016

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar
Default	AEP Ohio	05/2016	NON46881	Yocum, P Residence - Yocum, P Residence	OH	SUN	2063595 - 1 to 1	1	10-SPV-OH-GATS-0732	Yes
Default	AEP Ohio	06/2016	NON46881	Yocum, P Residence - Yocum, P Residence	OH	SUN	2138871 - 1 to 1	1	10-SPV-OH-GATS-0732	Yes
Default	AEP Ohio	07/2016	NON46881	Yocum, P Residence - Yocum, P Residence	OH	SUN	2572447 - 1 to 1	1	10-SPV-OH-GATS-0732	Yes
Default	AEP Ohio	08/2016	NON46881	Yocum, P Residence - Yocum, P Residence	OH	SUN	2575060 - 1 to 1	1	10-SPV-OH-GATS-0732	Yes
Default	AEP Ohio	09/2016	NON46881	Yocum, P Residence - Yocum, P Residence	OH	SUN	2578470 - 1 to 1	1	10-SPV-OH-GATS-0732	Yes
Default	AEP Ohio	10/2016	NON46881	Yocum, P Residence - Yocum, P Residence	OH	SUN	2582070 - 1 to 1	1	10-SPV-OH-GATS-0732	Yes
Default	AEP Ohio	12/2016	NON46881	Yocum, P Residence - Yocum, P Residence	OH	SUN	2594007 - 1 to 1	1	10-SPV-OH-GATS-0732	Yes
Default	AEP Ohio	04/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	2040903 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	11/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	2587552 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	10/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	2582269 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	09/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	2578739 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	08/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	2575480 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	07/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	2572752 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	06/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	2160277 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	05/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	2082537 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	01/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	1906094 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	03/2016	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	1946988 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes
Default	AEP Ohio	11/2016	NON54052	Timmerman, Lisa Residence - Timmerman, Lisa Residence	OH	SUN	2592546 - 1 to 1	1	11-SPV-OH-GATS-2062	Yes
Default	AEP Ohio	12/2016	NON59633	Valasik, Dave Residence - Valasik, Dave Residence	OH	SUN	2610972 - 1 to 1	1	12-SPV-OH-GATS-0466	Yes
Default	AEP Ohio	12/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	2614590 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	04/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	2042802 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	03/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	1930046 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	02/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	1908958 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	05/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	2054502 - 1 to 2	2	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	06/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	2141081 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	07/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	2573164 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	08/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	2576048 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	09/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	2579076 - 1 to 2	2	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	10/2016	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	2582816 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes
Default	AEP Ohio	01/2015	NON84448	Anthony Wayne Solar #1 LLC - Anthony Wayne Solar #1 LLC	OH	SUN	1309107 - 38 to 97	60	14-SPV-OH-GATS-0058	Yes
Default	AEP Ohio	02/2015	NON84448	Anthony Wayne Solar #1 LLC - Anthony Wayne Solar #1 LLC	OH	SUN	1332879 - 1 to 138	138	14-SPV-OH-GATS-0058	Yes
Default	AEP Ohio	03/2015	NON84448	Anthony Wayne Solar #1 LLC - Anthony Wayne Solar #1 LLC	OH	SUN	1367778 - 130 to 218	89	14-SPV-OH-GATS-0058	Yes

Direct Energy Business Marketing, LLC - Subaccount Details - OH - Jan 2016 - Dec 2016

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar
Default	AEP Ohio	01/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	1906909 - 1 to 1	1	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	03/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	1946711 - 1 to 1	1	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	06/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	2571012 - 1 to 2	2	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	05/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	2085915 - 1 to 1	1	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	10/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	2585967 - 1 to 1	1	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	09/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	2579755 - 1 to 2	2	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	08/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	2576101 - 1 to 2	2	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	07/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	2573029 - 1 to 2	2	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	04/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	2042459 - 1 to 2	2	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	11/2016	NON88193	Vogelbaum, Michael Residence - Vogelbaum, Michael Residence	OH	SUN	2588241 - 1 to 1	1	14-SPV-OH-GATS-0442	Yes
Default	AEP Ohio	03/2013	MSET31174111	Safe Harbor - 11	PA	WAT	620963 - 1 to 6618	6,618	13-HYD-PA-GATS-0402	
Default	FEOH	09/2015	NON59633	Valasik, Dave Residence - Valasik, Dave Residence	OH	SUN	1652451 - 1 to 1	1	12-SPV-OH-GATS-0466	Yes
Default	FEOH	11/2015	NON59633	Valasik, Dave Residence - Valasik, Dave Residence	OH	SUN	1790908 - 1 to 1	1	12-SPV-OH-GATS-0466	Yes
Default	FEOH	09/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1667037 - 1 to 56	56	12-SPV-OH-GATS-1389	Yes
Default	FEOH	10/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1715411 - 1 to 43	43	12-SPV-OH-GATS-1389	Yes
Default	FEOH	01/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1305230 - 1 to 9	9	12-SPV-OH-GATS-1389	Yes
Default	FEOH	02/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1332428 - 1 to 8	8	12-SPV-OH-GATS-1389	Yes
Default	FEOH	03/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1370507 - 1 to 46	46	12-SPV-OH-GATS-1389	Yes
Default	FEOH	04/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1409815 - 1 to 56	56	12-SPV-OH-GATS-1389	Yes
Default	FEOH	05/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1457090 - 1 to 70	70	12-SPV-OH-GATS-1389	Yes
Default	FEOH	06/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1520695 - 1 to 58	58	12-SPV-OH-GATS-1389	Yes

Direct Energy Business Marketing, LLC - Subaccount Details - OH - Jan 2016 - Dec 2016

[illegible]

Direct Energy Business Marketing, LLC - Subaccount Details - OH - Jan 2016 - Dec 2016

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar
Default	FE0H	07/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1554029 - 1 to 72	72	12-SPV-OH-GATS-1389	Yes
Default	FE0H	08/2015	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1615708 - 1 to 68	68	12-SPV-OH-GATS-1389	Yes
Default	FE0H	01/2015	NON84448	Anthony Wayne Solar #1 LLC - Anthony Wayne Solar #1 LLC	OH	SUN	1309107 - 1 to 37	37	14-SPV-OH-GATS-0058	Yes
Default	FE0H	03/2013	MSET31174102	Safe Harbor - 2	PA	WAT	620954 - 1 to 2118	2,118	13-HYD-PA-GATS-0402	
Default	FE0H	03/2013	MSET31174108	Safe Harbor - 8	PA	WAT	620960 - 1858 to 9995	8,138	13-HYD-PA-GATS-0402	
Default	FE0H	03/2013	MSET31174111	Safe Harbor - 11	PA	WAT	620963 - 6619 to 6765	147	13-HYD-PA-GATS-0402	
Total								17,879		

Direct Energy Business Marketing, LLC - Subaccount Details - OH - Jan 2016 - Dec 2016

OH Renewable	RPS	RPS Price	RPS Period	Deposit Date
	Yes	\$15.00	2016	04/04/2017
	Yes	\$15.00	2016	04/04/2017
	Yes	\$60.00	2016	04/04/2017
Yes	Yes	\$7.00	2016	04/04/2017
Yes	Yes	\$7.00	2016	04/04/2017
Yes	Yes	\$7.00	2016	04/04/2017