

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for an) Case No. 09-1036-GA-RDR
Adjustment to Rider IRP and Rider DSM)
Rates.)

OPINION AND ORDER

The Public Utilities Commission of Ohio, having considered the record in this matter and the stipulation and recommendation submitted by the signatory parties, and being otherwise fully advised, hereby issues its opinion and order.

APPEARANCES:

Stephen B. Seiple, Assistant General Counsel, and Brooke E. Leslie, Counsel, Columbia Gas of Ohio, Inc., 200 Civic Center Drive, P.O. Box 117, Columbus, Ohio 43216-0117, on behalf of Columbia Gas of Ohio, Inc.

Richard Cordray, Ohio Attorney General, by Duane W. Luckey, Section Chief, and Anne L. Hammerstein and Sarah Parrot, Assistant Attorneys General, 180 East Broad Street, Columbus, Ohio 43215-3793, on behalf of Staff of the Commission.

Janine L. Migden-Ostrander, Ohio Consumers' Counsel, by Larry S. Sauer and Joseph P. Serio, Assistant Consumers' Counsels, 10 West Broad Street, Columbus, Ohio 43215-3485, on behalf of the residential utility consumers of Columbia Gas of Ohio, Inc.

David C. Rinebolt and Colleen L. Mooney, 231 West Lima Street, Findlay, Ohio 45840, on behalf of Ohio Partners for Affordable Energy.

OPINION:

I. Background

Columbia Gas of Ohio, Inc. (Columbia) is a natural gas company as defined in Section 4905.03(A)(6), Revised Code, and a public utility under Section 4905.02, Revised Code. Columbia supplies natural gas to 1.4 million customers in 61 counties in Ohio (Columbia Ex. 2 at 1; Staff Ex. 1 at 2).

By opinion and order issued December 3, 2008, in *In the Matter of the Application of Columbia Gas of Ohio, Inc., for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution Service*, Case No. 08-72-GA-AIR et al. (Columbia Distribution

Rate Case) the Commission approved a stipulation which, *inter alia*, included a provision establishing the Infrastructure Replacement Program rider (Rider IRP) and the Demand-Side Management rider (Rider DSM) and directing Columbia to update Rider IRP and Rider DSM in a single case each year.

The purpose of Rider IRP is to recover the costs incurred by Columbia for: future maintenance, repair, and replacement of customer-owned service lines that present an existing or probable hazard to persons or property, and the replacement of certain risers prone to failure over a period of three years;¹ the accelerated main replacement program (AMRP), which includes replacement of cast iron, wrought iron, unprotected coated steel, and bare steel pipe in the company's distribution system, and metallic service lines; and the installation, over a five-year period, of automatic meter reading devices (AMRD) on all residential and commercial meters. In accordance with the stipulation approved in the *Columbia Distribution Rate Case*, Rider IRP was to be in effect for the lesser of five years or until new rates become effective as a result of Columbia filing an application for an increase in rates. In addition, the stipulation approved in the *Columbia Distribution Rate Case* provided that the rider would be adjusted annually to account for any over- or under-recovery and the company was to file applications annually, supporting adjustments to the Rider IRP rates. The stipulation set a cap on the Rider IRP charges for small general service (SGS) class customers of \$1.10, \$2.20, \$3.20, \$4.20, and \$5.30 for the charges that become effective on May 1 of each year in 2009, 2010, 2011, 2012, and 2013, respectively. (Columbia Ex. 2 at 2-3; Staff Ex. 1 at 3-7.)

The purpose of Rider DSM is to recover costs incurred in the implementation of DSM programs approved in the Commission's finding and order issued July 23, 2008 in *In the Matter of the Application of Columbia Gas of Ohio, Inc., for Approval of a Demand Side Management Program for Residential and Commercial Customers*, Case No. 08-833-GA-UNC (DSM Case). The stipulation approved in the *Columbia Distribution Rate Case* provides that the procedure for adjusting Rider DSM is identical to the filing procedure for adjusting Rider IRP. During the year covered by the current application, Columbia administered the following four DSM programs: Home Performance Solutions, Simple Energy Solutions, Small Business Energy Solutions, and Ohio Small Business Energy Saver Audits. (Staff Ex. 1 at 3.)

The stipulation in the *Columbia Distribution Rate Case* further defined the process for consideration of the periodic adjustments to Rider IRP and Rider DSM. In accordance with the stipulation, within 30 days of the Commission's order adopting the

¹ It is noted in the stipulation that the replacement of customer-owned service lines and prone-to-failure risers was approved by the Commission in *In the Matter of the Application of Columbia Gas of Ohio, Inc., for Approval of Tariffs to Recover, Through an Automatic Adjustment Clause, Costs Associated with the Establishment of an Infrastructure Replacement Program and for Approval of Certain Accounting Treatment*, Case No. 07-478-GA-UNC et al., Opinion and Order (April 9, 2008).

stipulation and annually by November 30 thereafter, Columbia will file a prefiling notice to implement adjustments to the riders. Subsequently, Columbia will file its application and an update of year-end actual data by the following February 28 of each year. The stipulation provides that Staff and other parties then may file comments and that Columbia has until March 31 of each year to resolve the issues raised in the comments. If the issues raised in the comments are not resolved, the stipulation requires that a hearing be held. The goal of the process set forth in the stipulation is for the proposed amendments to the riders to be effective on May 1 of each year.

In accordance with the provisions of the stipulation in the *Columbia Distribution Rate Case*, Columbia filed its prefiling notice on November 30, 2009, in the instant case. Thereafter, on February 26, 2010, Columbia filed its application to adjust the rates of Rider IRP and Rider DSM.

By entry issued March 5, 2010, the attorney examiner granted the motions to intervene in this case filed by the Ohio Consumers' Counsel (OCC) and Ohio Partners for Affordable Energy (OPAE) and granted the motion for admission *pro hac vice* of David Rinebolt. In addition, the examiner required that Staff and intervenors file comments on the application by March 31, 2010, and that Columbia file a statement, by April 5, 2010, informing the Commission whether the issues raised in the comments have been resolved. Furthermore, in the event all of the issues raised in the comments had not been resolved, the entry set the hearing in this matter for April 12, 2010.

On March 31, 2010, Staff, OCC, and OPAE filed comments raising issues regarding Columbia's application in this case. On April 5, 2010, Columbia filed a statement stating that the parties in this case had reached an agreement in principle on the issues raised in the comments and requesting that the hearing scheduled for April 12, 2010, go forward. By entry issued April 9, 2010, the attorney examiner rescheduled the hearing to April 15, 2010, at the request of the parties.

The hearing in this matter was conducted, as rescheduled, on April 15, 2010, at the offices of the Commission. At the hearing, Columbia submitted a stipulation and recommendation (stipulation) signed by Columbia, Staff, OPAE, and OCC (Jt. Ex. 1). In addition, at the hearing, the following exhibits were admitted into the record without objection: Columbia submitted its prefiling notice (Columbia Ex. 1); the application filed on February 26, 2010 (Columbia Ex. 2); the testimony of its witnesses (Columbia Exs. 3-7, 12); the AMRP, riser, AMRD, and DSM auditor's reports (Columbia Exs. 8-11). OCC submitted its comments filed on March 31, 2010 (OCC Ex. 1). Staff submitted the comments that it filed on March 31, 2010 (Staff Ex. 1). OPAE submitted the comments that it filed on March 31, 2010 (OPAE Ex. 1).

Pursuant to Rule 4901-1-31, Ohio Administrative Code (O.A.C.), upon motion of any party or upon their own motion, the Commission or the attorney examiner may permit or require the filing of briefs at any time during a proceeding. At the hearing held on April 15, 2010, the attorney examiner denied OCC requests to call for briefs in this proceeding. In contravention of the examiner's ruling, on April 22, 2010, OCC filed a document titled "Post-hearing Brief in Support of the Stipulation." The Commission notes that this is a fully stipulated case and OCC is a signatory party to the stipulation. Accordingly, the Commission finds that OCC has disregarded the examiner's ruling regarding the filing briefs in this case by improperly filing a brief; therefore, OCC's April 22, 2010, filing will not be considered in this case.

II. Summary of the Application and Comments

A. Rider IRP

Columbia states that the application is based on a test year beginning January 1, 2009, and ending December 31, 2009, with a date certain of December 31, 2009 (Columbia Ex. 2 at 4). According to Columbia's witness Stephanie Noel, the order in the *Columbia Distribution Rate Case* provided for the recovery of return on and return of Columbia's capitalized AMRP, riser, and AMRD investments, in addition to the related costs, such as program operating expenses and deferred expenses (Columbia Ex. 3 at 4-5). Columbia's witness David Roy offers that, in 2009, the company completed 339 AMRP projects at a cost of approximately \$34 million, replaced 87,328 risers at a cost of approximately \$43 million, and replaced 9,955 hazardous service lines at a cost of approximately \$23 million (Columbia Ex. 4 at 4). In addition, Columbia witness Brad Bohrer testified that, during 2009, more than 153,000 AMRD units were installed (Columbia Ex. 6 at 7).

Columbia submits that, for rates effective May 2010, the total annual revenue requirement for Rider IRP would be \$31,734,073. This total is comprised of \$10,904,990 for the AMRP, \$18,824,523 for the riser program, and \$2,004,561 for the AMRD program (Columbia Ex. 2 at 4, Sch. AMRP-1, Sch. R-1; Sch. AMRD-1). According to Ms. Noel, if the new rates go into effect May 1, 2010, the rates for SGS class customers will be set at \$1.70 per month, which is less than the cap of \$2.20 per month approved in the *Columbia Distribution Rate Case* (Columbia Ex. 3 at 21). Furthermore, as proposed by Columbia in the application, the May 1, 2010, Rider IRP rates would be \$5.76 for general service (GS) customers, and \$150.18 for large general service (LGS) customers (Columbia Ex. 2 at Att. A).

In its comments, Staff recommends four adjustments to Columbia's AMRP calculation, three adjustments to Columbia's riser program calculations, and five adjustments to Columbia's AMRD calculation. With the adjustments recommended by

Staff, the monthly charges for SGS, GS, and LGS customers would be \$1.57, \$4.63, and \$112.67, respectively. The five adjustments to the AMRP calculation recommended by Staff include: a \$13,516 reduction in plant additions to eliminate the allowance for funds used during construction (AFUDC) charged to the service lines portion of the AMRP additions; a \$913 reduction to eliminate AFUDC charged to the house regulators portion of the AMRP additions; a \$1,981 reduction to reflect the usage of the last known property tax rate, as opposed to an estimated rate; and an increase in operation and maintenance (O&M) savings in the amount of \$2,719,804. The three adjustments recommended by Staff to the riser program include: a reduction to plant additions of \$92,074 to eliminate the AFUDC charged to the risers portion of the additions; a reduction to plant additions of \$52,178 to eliminate the AFUDC charged to the hazardous service lines portion of the riser program; and a reduction to the property tax expense of \$6,786 to reflect the use of the last known property tax rate. The five adjustments recommended by Staff to the AMRD program include: a reduction of \$71,425 to plant additions to eliminate AFUDC charged to the AMRD program; a reduction to plant additions of \$268,495 to exclude labor and transportation costs associated with meter replacements involving AMRDs and to exclude labor and transportation charges for AMRD installations made on customer premise visits to obtain an actual meter reading at least once per year as required; a \$12,482 reduction in plant additions to exclude the cost of piping and connections associated with meter replacements involving AMRDs; a \$503 reduction in plant additions to exclude the cost of special tools; and a \$7,422 reduction in the annualized property tax expense to reflect the utilization of the latest known property tax rate. (Staff Ex. 1 at 9-14.)

OCC, in its comments, recommends the Commission direct Columbia to perform a study of the costs and benefits of the AMRP program to determine if the program should continue, arguing that the project has not delivered the expected benefits or cost savings to customers. In addition, OCC recommends three adjustments to Columbia's calculations of Rider IRP. First, OCC submits that the O&M savings should be calculated in a way that aggregates savings using only the savings, not the increased costs, from each category to reflect a savings of \$2,719,805. Second, OCC maintains that out-of-test-year expenses should not be included in the IRP rate calculation for the 2009 year, which results in a decrease of \$26,859 in the AMRP-related expenses. Finally, OCC proposes excluding the costs related to the replacement of plastic pipe, which OCC estimates would result in a reduction of the AMRP revenue requirement of \$486,959. (OCC Ex. 1 at 3-16.)

OPAE did not make any recommendations with respect to the IRP portion of the application.

B. Rider DSM

Columbia states that the application is based on a test year beginning January 1, 2009, and ending December 31, 2009, with a date certain of December 31, 2009 (Columbia Ex. 2, at 4). According to Columbia's witness John A. Lavery, the order in the *Columbia Distribution Rate Case* provides Columbia authority to defer expenses incurred in the development and implementation of the DSM programs (Columbia Ex. 7 at 7). The total revenue requirement for Rider DSM would be \$1,564,552 (Columbia Ex. 2 at Sch. DSM-1; Columbia Ex. 7 at 8). As proposed in the application, the rate of Rider DSM would be \$0.0132 per thousand cubic feet (Mcf) for the SGS class (Columbia Ex. 2 at Sch. DSM-5).

Staff makes several recommendations with respect to Columbia's DSM programs. Initially, Staff notes that Columbia was permitted to spend approximately \$7 million in 2009 on DSM programs, but only spent approximately \$1.5 million. According to Staff, Columbia requests, in its application, to roll the difference of approximately \$5.5 million into its DSM programs in 2010. Staff states that it supports the use, in 2010, of the \$5.5 million that went unused in 2009, but states that the ability to use unused funds in subsequent years should be limited to only this year, due the inherent difficulty in rapidly implementing a new set of DSM programs. Second, Staff expresses concern over the level of administrative expenses associated with the DSM programs in 2009. A 20 percent cap exists on the amount of total program costs which could be expended on administrative, advertising, and education expenses (collectively referred to as administrative expenses). During 2009, DSM program costs for administrative expenses greatly exceeded the 20 percent cap. Staff proposes that, to allow Columbia to adequately expend funds to initiate its DSM programs, Columbia's DSM programs should be evaluated on a three-year basis with respect to the spending cap on administrative costs. However, Staff asserts that, to assure that the limit is met in the future, any administrative DSM expenses in 2010 and 2011 that exceed the cap, should be disallowed for recovery. Moreover, Staff states that, if this reduction does not bring administrative expenses under the cap amount, the Commission should further disallow recovery of any administrative expenses incurred that exceed the 20 percent cap. Finally, Staff also notes that the DSM stakeholders group (DSMSG) is authorized to make changes to the DSM programs. However, minutes of the meetings of the DSMSG are not kept, providing no way to verify and record any program modifications made to the DSM programs. Accordingly, Staff recommends that minutes be taken of any further meetings of the DSMSG. (Staff Ex. 1 at 14-21.)

OPAE, in its comments, supports Staff's recommendation that administrative expenses should be reviewed based on a three-year average to more accurately reflect the relationship between administrative and program expenditures. In addition, OPAE

supports the recommendation of Staff that Columbia be allowed to carry over unused expenses for the 2009 year into the 2010 program year. (OPAE Ex. 1 at 1-3.)

OCC did not make any recommendations with respect to the DSM portion of Columbia's application

III. Summary of the Stipulation

As stated previously, a stipulation, signed by Columbia, Staff, OCC, and OPAE, was submitted on the record at the hearing held on April 15, 2010. The stipulation was intended by the signatory parties to resolve all outstanding issues in this proceeding. The stipulation includes, *inter alia*, the following provisions:

- (1) The annual revenue requirement for Rider IRP shall be decreased by \$1,800,000 from that proposed in Columbia's application. The rate for Rider DSM shall be the rate proposed in the application.
- (2) The monthly Rider IRP rates shall be \$1.62, \$5.02, and \$125.39 for the SGS, GS, and LGS class customers, respectively.²
- (3) For the purpose of future Rider IRP applications, the O&M savings attributable to Columbia's AMRP program shall be calculated by including only those Columbia account activities agreed upon by the parties at a later date. The parties agree that, if they cannot determine which activities should be reviewed for the calculation of O&M savings, the unresolved activities issue will be submitted to the Commission for its consideration and resolution as part of Columbia's next annual IRP application. Moreover, only those activities experiencing savings will be included in the calculation of O&M savings; therefore, activities experiencing increased expenditures will not be included.
- (4) Columbia will not use Rider IRP to recover investment costs that would routinely be included in and funded by Columbia's existing capital replacement program. Columbia will provide evidence in its annual Rider IRP applications to show that the rider was not used to recover the costs of projects that otherwise would have been included in its capital replacement program.

² The Commission notes that the stipulation, at page 7, incorrectly reflects that the Rider IRP charges will be on a per Mcf basis. However, the proposed tariffs attached to the stipulation correctly reflect that these charges will be on a per month basis.

- (5) In future Rider IRP filings, Columbia shall document the factors it uses to determine the priority of pipe to be replaced in a given test year, which shall include the factors Columbia considered in prioritizing the pipe replacement.
- (6) Columbia will be permitted to roll any unspent DSM amounts from the 2009 DSM year in to the expense caps for 2010 and/or 2011, even though that may cause Columbia to exceed the 1 percent annual revenue threshold for 2010 and 2011 set forth in the *Columbia Distribution Rate Case*.
- (7) Columbia's DSM programs will be evaluated on a three-year (2009-2011) basis. Program implementation management expenses will not be included in the 20 percent cap related to administration, marketing, and education expenses for the DSM programs. Expenses exceeding program caps for the three-year review period will be disallowed for recovery through Rider DSM.
- (8) Columbia will record and maintain the minutes of the DSMSG meetings.

(Jt. Ex. 1 at 2-5, Att. A.)

CONCLUSION:

Rule 4901-1-30, O.A.C., authorizes parties to Commission proceedings to enter into a stipulation. Although not binding on the Commission, the terms of such an agreement are accorded substantial weight. *Consumers' Counsel v. Pub. Util. Comm.*, 64 Ohio St.3d 123, 125 (1992), citing *Akron v. Pub. Util. Comm.*, 55 Ohio St.2d 155 (1978). This concept is particularly valid where the stipulation is unopposed by any party and resolves all issues presented in the proceeding in which it is offered.

The standard of review for considering the reasonableness of a stipulation has been discussed in a number of prior Commission proceedings. *Cincinnati Gas & Electric Co.*, Case No. 91-410-EL-AIR (April 14, 1994); *Western Reserve Telephone Co.*, Case No. 93-230-TP-ALT (March 30, 1994); *Ohio Edison Co.*, Case No. 91-698-EL-FOR *et al.* (December 30, 1993); *Cleveland Electric Illum. Co.*, Case No. 88-170-EL-AIR (January 30, 1989); *Restatement of Accounts and Records (Zimmer Plant)*, Case No. 84-1187-EL-UNC (November 26, 1985). The ultimate issue for our consideration is whether the agreement, which embodies considerable time and effort by the signatory parties, is reasonable and should be adopted. In considering the reasonableness of a stipulation, the Commission has used the following criteria:

- (1) Is the settlement a product of serious bargaining among capable, knowledgeable parties?
- (2) Does the settlement, as a package, benefit ratepayers and the public interest?
- (3) Does the settlement package violate any important regulatory principle or practice?

The Ohio Supreme Court has endorsed the Commission's analysis using these criteria to resolve issues in a manner economical to ratepayers and public utilities. *Indus. Energy Consumers of Ohio Power Co. v. Pub. Util. Comm.*, 68 Ohio St.3d 559 (1994), citing *Consumers' Counsel*, *supra*, at 126. The court stated in that case that the Commission may place substantial weight on the terms of a stipulation, even though the stipulation does not bind the Commission (*Id.*).

The signatory parties agree that the stipulation is a product of serious bargaining among capable, knowledgeable parties, and represents a just and reasonable resolution of issues raised by the parties (Jt. Ex. 1 at 1). Columbia's witness, Ms. Noel, testified that the stipulation is the product of an open process in which all parties were represented by capable knowledgeable counsel and experts. The witness points out that the signatory parties regularly participate in Commission proceedings and they represent a broad range of interests. (Columbia Ex. 12 at 4.) Upon review of the terms of the stipulation, based on our three-prong standard of review, the Commission finds that the first criterion, that the process involved serious bargaining by knowledgeable, capable parties, is met.

With regard to the second criterion, Ms. Noel testified that the stipulation benefits ratepayers and is in the public interest. She points out that, because of the IRP program, consumers will experience fewer leaks, fewer outages, and less repairs which require road excavation. Additionally, according to Ms. Noel, the installation of AMRDs will enable Columbia to read meters on a monthly basis for all customers. With respect to the DSM programs, Ms. Noel asserts that those programs will provide residential and small commercial customers easy access to energy saving measures, which will directly reduce natural gas usage, improving the affordability of natural gas service. Finally, through the negotiations, the revenue increase agreed to by the stipulating parties is \$1.8 million lower than the increase proposed by Columbia in its application. (Columbia Ex. 3 at 5-6.) Upon review of the stipulation, we find that, as a package, it satisfies the second criterion.

Finally, the signatory parties agree that the stipulation violates no regulatory principle or precedent (Jt. Ex. 1 at 1). Ms. Noel asserts that the stipulation was based, in large part, on the recommendations of Staff, which analyzed the application and made

recommendations for the purpose of ensuring that the resulting rates, terms, and conditions of service comply with sound regulatory principles and practices. (Columbia Ex. 12 at 7.) Accordingly, upon consideration, the Commission finds that there is no evidence that the stipulation violates any important regulatory principle or practice and, therefore, the stipulation meets the third criterion.

We find that the stipulation entered into by the parties is reasonable and should be adopted. Therefore, Columbia should be authorized to implement the new rates for Rider IRP and Rider DSM in a manner consistent with the stipulation and this order, and the proposed tariff pages contained in Jt. Ex. 1 at Att. 1 should be approved. The Commission finds that Columbia should file, in final form, four, complete, printed copies of the final tariff pages with the Commission's docketing division, as set forth in this order. The effective date of the new rates for Rider IRP and Rider DSM shall be a date not earlier than the date upon which the final tariff pages are filed with the Commission or the first billing cycle in May, whichever is later.

FINDINGS OF FACT AND CONCLUSIONS OF LAW:

- (1) Columbia is a natural gas company as defined in Section 4905.03(A)(6), Revised Code, and a public utility under Section 4905.02, Revised Code.
- (2) In accordance with the IRP and DSM provisions in the *Columbia Distribution Rate Case*, Columbia filed its prefiling notice in this case on November 30, 2009.
- (3) On February 26, 2010, Columbia filed its application in this case.
- (4) By entry issued March 5, 2010, OCC and OP&E were granted intervention.
- (5) Comments on the application in this case were filed by OCC, OP&E, and Staff on March 31, 2010.
- (6) The hearing in this matter was held on April 15, 2010.
- (7) At the hearing, a stipulation was submitted, intending to resolve all issues in this case. No one opposed the stipulation.
- (8) The stipulation meets the criteria used by the Commission to evaluate stipulations, is reasonable, and should be adopted.

- (9) Columbia should be authorized to implement the new rates for Rider IRP and Rider DSM consistent with the stipulation and this order.

ORDER:

It is, therefore,

ORDERED, That the stipulation of the parties be adopted and approved. It is, further,

ORDERED, That Columbia take all necessary steps to carry out the terms of the stipulation and this order. It is, further,

ORDERED, That Columbia be authorized to file in final form four complete copies of the tariff pages consistent with this opinion and order and to cancel and withdraw its superseded tariff pages. Columbia shall file one copy in its TRF docket (or may make such filing electronically as directed in Case No. 06-900-AU-WVR) and one copy in this case docket. The remaining two copies shall be designated for distribution to the Rates and Tariffs, Energy and Water Division of the Commission's Utilities Department. It is, further,

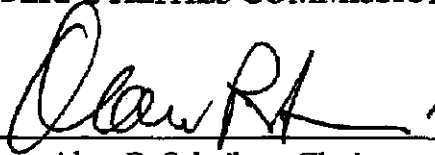
ORDERED, The effective date of the new rates for Rider IRP and Rider DSM shall be a date not earlier than the date upon which four complete, printed copies of the final tariff pages are filed with the Commission or the first billing cycle of May, whichever is later. It is, further,

ORDERED, That the company shall notify its customers of the changes to the tariffs via bill message or bill insert within 30 days of the effective date of the revised tariffs. A copy of this customer notice shall be submitted to the Commission's Service Monitoring and Enforcement Department, Reliability, and Service Analysis Division at least 10 days prior to its distribution to customers. It is, further,

ORDERED, That nothing in this opinion and order shall be binding upon the Commission in any future proceeding or investigation involving the justness or reasonableness of any rate, charge, rule, or regulation. It is, further,

ORDERED, That a copy of this opinion and order be served upon each party of record.

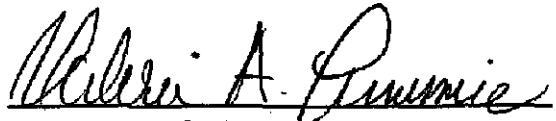
THE PUBLIC UTILITIES COMMISSION OF OHIO



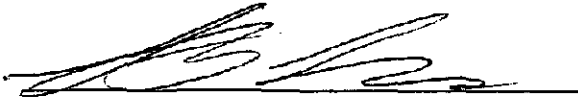
Alan R. Schriber, Chairman



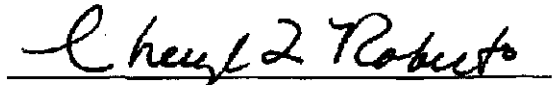
Paul A. Centolella



Valerie A. Lemmie



Steven D. Lesser



Cheryl L. Roberto

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Renee J. Jenkins
Secretary