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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Review of its Rules for Competitive Retail Natural Gas Service Contained in Chapters 4901:1-27 through 4901:1-34 of the Ohio Administrative Code.	:	Case No. 12-925-GA-ORD

INITIAL COMMENTS
OF
DOMINION RETAIL, INC.

Dominion Retail, Inc. ("Dominion Retail"), a duly-certified provider of competitive retail natural gas service ("CRNGS") in this state, hereby submits its initial comments in the above-captioned rulemaking proceeding pursuant to the Commission's November 7, 2012 entry in this docket.

ATTACHMENT A

Attachment A to the November 7, 2012 entry poses a series of questions seeking input with respect to certain issues relating to the provision of CRNGS in this state. Dominion Retail's responses are set forth below.

1. *The Commission noted in In the Matter of the Complaint of Buckeye Energy Brokers, Inc., v. Palmer Energy Company, Case No. 10-693-GE-CSS (10-693), that there may be ambiguity in Chapter 4901:1-29, O.A.C. relative to distinguishing the activities of consultants and brokers. Specifically, in 10-693, the Commission stated our belief that it would be appropriate to further explore this issue in this case. One of the issues we identified to be incorporated within this examination is the manner in which entities are compensated for their services and whether they receive compensation notwithstanding the fact that an aggregator program may not actually commence or is short-lived. Another possible issue for consideration could be an analysis of what are the obligations of the consultant, to the extent that a supplier fails to provide the commodity required for the aggregation program. Are competitive retail natural gas service provides who*

conduct sales through agents that are compensated primarily or exclusively on a commission basis, incentivizing these agents to take unfair advantage of potential customers through deceptive sales practices? Would sales agents be less incentivized if they were employees of the seller and/or provided with some level of base salary?

Dominion Retail prefaces its responses to these questions by noting that it is axiomatic that the Commission, as a creature of statute, has only those powers specifically conferred upon it by the legislature.[1] The Commission has no statutory authority to regulate consultants or to dictate the terms of arms-length business/compensation arrangements between governmental aggregators and consultants or brokers. Moreover, the Commission does not have the statutory authority to preclude suppliers from utilizing non-employee sales agents to market their services or to restrict the manner in which suppliers compensate either their employees or outside sales agents. Thus, the foregoing questions appear to be largely academic.

Having said this, Dominion Retail believes that governmental aggregators should be free to engage either consultants or brokers under any terms that are mutually acceptable to the parties involved. The existing certification requirements are intended to insure, among other things, that governmental aggregators have the necessary expertise to establish an aggregation program. Thus, certified governmental aggregators should be well aware that a program may not actually commence or that it may be short-lived and can take this into account in negotiating their arrangements with either consultants or brokers without intrusion by the Commission.

As previously noted, the Commission has no jurisdiction over consultants, so the question of whether a consultant should be subject to some sort of liability if a supplier defaults is moot. However, assuming the Commission intended the reference to consultants to encompass brokers

[1] *See, e.g., Time Warner AxS v. Pub. Util. Comm.*, 75 Ohio St.3d 229, 234 (1996); *Canton Transfer and Storage Co. v. Pub. Util. Comm..*, 72 Ohio St.3d 1, 5 (1995); *Dayton Communications Corp. v. Pub. Util. Comm.*,64 Ohio St.2d 302, 307 (1980); *Consumers' Counsel v. Pub. Util. Comm.*, 67 Ohio St. 2d, 153, 166 (1981).

in formulating this inquiry, Dominion Retail would point out that only Commission-certified CRNGS providers can supply aggregations. Thus, it is difficult to come up with a rationale as to why a broker should somehow be held accountable if a Commission-certified supplier defaults. The obligations of the broker are dictated by its agreement with the governmental aggregator, and there is no basis for the Commission to impose any additional obligations on the broker in a supplier default scenario.

The final two questions in this section go to whether commission-based compensation incents supplier employees and non-employee sales agents to engage in deceptive sales practices. Dominion Retail agrees that the Commission should address deceptive sales practices, but believes that Rule 4901:1-29-05(C), OAC, represents the appropriate vehicle for doing so. Indeed, Dominion endorses the Staff-proposed revisions to the rules that would impose additional customer protection measures, particularly with respect to door-to-door solicitations. However, as discussed above, the Commission should not overstep its authority by attempting to dictate the terms under which a supplier can compensate its employees or outside sales agents, nor can the Commission lawfully require that that marketing efforts be conducted only by employees of the supplier.

2. *Rule 4901:1-28-04(A), O.A.C, provides opt-out disclosure requirements for governmental aggregators which require written notice to potential customers that include, among other things, a summary of the actions that the governmental entity took to authorize the aggregation. Should aggregation incentives, such as financial contributions to the community, be disclosed in these opt-out notices or is media coverage of aggregation incentives adequate?*

Dominion Retail believes that no legitimate purpose would be served by requiring governmental aggregators to disclose any inducements the community has received for selecting a particular CRNGS provider to supply the aggregation. When the opt-out notices go out, the

supplier has already been selected and the pricing arrangement is a done deal. Thus, it is not clear how including this additional information in the opt-out notice would assist customers in deciding whether to opt-out of an aggregation program. As a review of Rule 4901:1-28-04, OAC, will confirm, the purpose of the opt-out notice is to provide the customer with the pricing information necessary to make an informed choice as to whether to participate in the aggregation, remain on the utilities default service, or contract with a competitive supplier. Moreover, there is nothing that prevents the governmental aggregator from including this information in the opt-out notice if it so desires. Dominion Retail recommends leaving this to the discretion of the aggregator rather than adding another regulation.

3. *It is the policy of the state, under Section 4929.02, Revised Code, to promote diversity of natural gas supplies and suppliers by giving consumers effective choices over the selection of those supplies and suppliers. Should the Commission's rules regulate the availability of certain lengths and types of contracts for certain customer classes. Should the Commission's rules require a supplier to disclose all inducements to contract?*

Dominion Retail is not certain exactly what is contemplated by the first question, but, if the upshot is that the Commission would limit choices available to consumers, Dominion Retail would oppose such an amendment. As long as the terms of an offer are fully disclosed, the customer should be permitted to determine whether the length and type of contract proposed are desirable. On the other hand, Dominion Retail agrees that the rules should require that all inducements offered to customers to contract with a supplier should be disclosed in the offer and memorialized in the contract. Because suppliers are accountable for the actions of their sales agents, this requirement would serve to deter unscrupulous practices by sales agents engaging in telemarketing and door-to-door solicitations.

4. *Rule 4901:1-29-06(E), O.A.C, requires competitive retail natural gas service provides, governmental aggregators, or independent third-party verifiers, to make a date- and time-stamped audio recording that verifies the customer's acceptance of the offer before enrolling a customer telephonically. Should the rule also require the sales pitch segment of the call to also be recorded? Should the rules be clarified to require greater customer protections?*

A requirement that the entire phone call be recorded would be consistent with Dominion Retail's actual practice. Thus, Dominion Retail would support such a rule change. However, although agreeing that consumers should be protected against unscrupulous practices, Dominion Retail does not see the need for any other additional rule changes at this time.

5. *It is the policy of the state, under Section 4929.02, Revised Code, to promote the availability to consumers of adequate, reliable, and reasonably priced natural gas services and goods. Are there best practices from other states that should be incorporated in the rules to facilitate this promotion? Other state commissions post supplier complaint data on their web sites identifying the numbers and types of consumer complaints received by the commission's call center. If normalized, should complaint data be added to the Apples to Apples Chart?*

Dominion Retail opposes posting customer complaint data on the Apples to Apples Chart for several reasons.

First, issues would arise as to whether a call to the Commission's call center constituted a "complaint" as opposed to a customer inquiry or a misunderstanding on the part of the customer. If complaint data were to be posted on the Commission's website, suppliers would be likely to contest the characterization of a call as a "complaint," which, in turn, could lead to disputes between the suppliers and Commission personnel over what, in many instances, would be a subjective determination.

Second, even if the Commission were to adopt a strict definition of what constitutes a "complaint" for purposes of keeping a tally on the Apple to Apples Chart, the mere fact that a customer complains does not mean that the complaint has any merit. Thus, posting the number

of "complaints" received by the Commission's call center regarding a particular supplier could be misleading and prejudicial.

Third, posting supplier complaint data could have an unintended consequence that it is contrary to the policy of encouraging the informal resolution of customer issues. A supplier may be less likely to act to resolve a customer concern in instances where the supplier disagrees with the customer's position if the attempt to appease the customer would result in the call being deemed a "complaint" and included as such in the data posted on the website.

Fourth, posting the number of complaints received regarding a particular supplier would not, of itself, provide useful information to the consumer regarding the relative merits of the various suppliers because the raw numbers would not reflect the total number of customers served by the supplier in question versus the number of customers served by a supplier whose service generates fewer complaints. In so stating, Dominion Retail recognizes that the question refers to the use of "normalized" complaint data, which Dominion Retail interprets to mean that the complaint data would be expressed on some sort of complaints-per-number-of-customers basis. However, this would require continuous updating that would impose burdens on both suppliers and Commission staff ("Staff"), and would also require a detailed explanation on the Apple to Apples Chart, which is already difficult for the average consumer to decipher.

Finally, Dominion Retail would point out that the utilities do not post complaint data regarding their default commodity service on the website. Thus, posting supplier complaint statistics may create the impression that only marketers have complaint issues, which would tend to discourage shopping. If, notwithstanding the foregoing observations, the Commission determines that the posting of complaint data should be given further consideration, Dominion

Retail urges the Commission to schedule a workshop on this subject so that it can be fully explored before making any rule change in this regard.

6. *Rule 4901:1-29-05(A)(2), O.A.C, identifies the information that must be included in variable-rate offers. In addition to or in substitution for this rule requirement, should "variable rate" be a defined term and include reference to the indices that the supplier is using as the basis for price, such as the NYMEX?*

Generally speaking, Dominion Retail believes the information required by the existing rule adequately informs customers of the terms and conditions of variable-rate offers. However, Dominion Retail would support standardized definitions of "fixed rate" and "variable rate" offers to prevent a supplier from marketing an offer as a fixed rate offer when, in fact, the underlying contract terms provide for rate adjustments to pass through the impact of changes in various costs incurred by the supplier (*e.g.*, changes in capacity charges and the like). Dominion Retail does not intend to suggest that fixed rate contracts cannot provide for adjustments for cost changes resulting from changes in laws and regulations. Indeed, such terms are typically found in fixed rate contracts. Rather, Dominion Retail is referring here to cost components that are known to be variable over the term of the contract at the time the contract is entered into. Dominion Retail believes it is extremely misleading to tout offers that permit adjustments for the latter as being fixed rate offers.

In addition, Dominion Retail would note that the definitional issue will take on greater significance if and when non-shopping customers are assigned to suppliers under a Monthly Variable Rate ("MVR") program upon an LDC's exit from the merchant function. At that point, it will be important that the derivation of the supplier's then-posted variable rates – the lowest of which will become the MVR – be clearly explained so that customers can make an informed decision as to whether to stay with the assigned supplier or switch to a different marketer.

7. *In issuing these rules for comment, there has been an attempt to harmonize the rules governing gas and electric suppliers. Are there additional revisions necessary?*

Dominion Retail applauds Staff's efforts to harmonize the rules proposed in this case with the rules for competitive retail electric service now under consideration in Case No. 12-1924-EL-ORD. However, there are still a number of inconsistencies between the two sets of proposed rules. Further, contrary to the recommendation presented by various marketer representatives at the August 6, 2012 workshop that, where the gas and electric requirements are in conflict, the less restrictive terms should be utilized in the new rules, Staff appears to have opted for the more restrictive term in several instances.

8. *Are additional rules necessary to protect customers as local distribution companies begin to exit the merchant function?*

Apart from the issue regarding the definition variable rate addressed in the response to Question 6, Dominion Retail does not believe any additional rule changes are necessary to protect customers as LDC's exit the merchant function. Although customers obviously need to be fully informed regarding the import of merchant function exits, the necessary customer education efforts can best be addressed on a company-by-company basis in the orders approving the exit. Moreover, because the only real change will be the manner in which default commodity service will be supplied, all the customer protection provisions of existing Rule 4901:1-29-05(C), OAC, will continue to apply. Thus, no additional rule changes are necessary.

PROPOSED RULE CHANGES

Dominion Retail offers the following comments with the respect to the proposed rules set forth in Attachment B to the November 7, 2012 entry.

Proposed Rule 4901:1-27-04 Filing of an application.

Staff proposes that existing Rule 4901:1-27-04, which sets out the application process for securing or renewing certification, be redesignated as Rule 4901:1-27-05, headed "Application content," and that a new Rule 4901:1-27-04 be inserted, which would provide as follows:

> Beginning on the effective date of this chapter, each application for certification or certification renewal shall be assigned a new case number in sequential order as the case is received, beginning with XX-7000 by the commission's docketing division.

Dominion Retail notes that the entry contains no explanation of the reason for this change to the existing practice of filing certificate renewal applications in the docket in which the initial certification was approved, and believes that, in the absence of a compelling justification for this new procedure, the existing practice should be retained. Utilizing the case number assigned to the original application for subsequent renewal applications facilitates researching the certification history of a particular supplier, broker, or governmental aggregator. Assigning a new case number to each renewal application would eliminate this easily-followed trail and greatly complicate such research efforts by requiring an interested party to perform a DIS name search (which, unfortunately, does not always yield complete results), identify all the CRS cases in which the company in question was involved, then look up and cull through each individual docket to find the desired information.

In addition, maintaining a supplier's certification and renewal certification filings in a single docket assists the supplier in keeping track of the status of protective orders covering

confidential information filed under seal. This capability will become increasingly important if the Staff's proposal to extend protection to certain application exhibits for a period of six years is adopted because the longer time frame increases the likelihood that there will be changes in supplier personnel and legal counsel between the filing of exhibits under seal. Plainly, the possibility of the expiration of protection slipping through the cracks is greater if one has to research multiple dockets to keep abreast of the protected status of these documents.

Although Dominion Retail opposes proposed Rule 4901:1-27-04 for the reason stated above, if this rule is to be adopted, two changes are required. First, the provision should be effective beginning on the effective date of the "rule," not the effective date of "this chapter," as Chapter 4901:1-27 has been in effect for many years. Second, the proposed language is extremely awkward. The syntax would be improved by moving the phrase "by the commission's docketing division" from the end of the sentence to follow the words "shall be assigned a new case number."

Proposed Rule 4901:1-27-05 Filing of an application.

As noted above, Staff proposes that existing Rule 4901:1-27-04, which covers certification and certification renewal applications, be renumbered as Rule 4901:1-27-05. However, the Staff has also proposed certain substantive changes to the existing rule, including a requirement in subparagraph (B)(1)(f) that the applicant disclose any pending legal actions or past rulings against it. Dominion Retail agrees that this information should be included in the application, but questions whether, in view of this new language in subparagraph (B)(1)(f), the requirement in subparagraph (B)(1)(b) calling for the a description of "prior judicial or regulatory actions" is still necessary. Because the focus of subparagraph (B)(1)(b) is information regarding "(m)anagerial experience and capabilities," it would appear that the reference to "prior

judicial or regulatory actions" (which will now be covered by new (B)(1)(f)) should be replaced with a requirement that the applicant identify all jurisdictions in which it is authorized to provide competitive retail services. This measure would be consistent with what the current application form actually requires in the "Managerial Capability and Experience" section.

Staff has also added new subparagraphs (i), (ii), and (iii) to proposed Rules 4901:1-27-05(B)(1)(c) and (B)(2)(b) specifying that applicants must provide "Financial Exhibit 1," "Financial Exhibit 2," and "Financial Exhibit 3" as a part of the financial information submitted pursuant to these provisions. However, the current application forms contain no references to such exhibits. Rather, the "Financial Capability and Experience" section of the current application forms specify that the applicant must provide, as Exhibit C-3, copies of its balance sheets, income statements, and cash flow statements for the two most recent years, and, as Exhibit C-5, projected financial statements for the next two years. Accordingly, Dominion Retail believes that subparagraphs (i), (ii), and (iii) of proposed Rules 4901:1-27-05(B)(1)(c) and (B)(2)(b) should be eliminated because the "Financial Exhibits" to which they refer are not only undefined, but the nomenclature is inconsistent with the financial exhibit designations specified in the current versions of the application forms.

In this connection, Dominion Retail would also note that there are a number of other inconsistencies between the information that may be required by the application forms as set forth in the various subparagraphs of proposed Rules 4901:1-27-05(B)(1), (B)(2), and (B)(3) – currently Rules 4901:1-27-04(B)(1), (B)(2), and (B)(3) – and the far more detailed information that must, in fact, be provided by the applicant to complete the actual application forms themselves. As explained below, Dominion Retail believes that the appropriate fix for this

awkward and confusing situation is simply to eliminate all the subparagraphs of Rule 490:1-27-05(B).

Proposed Rule 4901:1-27-05(A) continues to require that applications be made on forms authorized by the Commission and generally describes the information that the forms are intended to elicit, while proposed Rule 4901:1-27-05(B) continues to require that the applicant complete the appropriate application form in its entirety and supply all required attachments, affidavits, and evidence of capability specified in the form. However, like current Rules 4901:1-27-04(B)(1), (B)(2), and (B)(3), proposed Rules 4901:1-27-05(B)(1), (B)(2), and (B)(3), after again stating that the applicant "shall file general, technical, managerial, and financial information as set forth in the application," then provide that "(t)his information" – *i.e.*, the information specified in the application form – "includes, but is not limited to" the information identified in the various subparagraphs of the rule. In Dominion Retail's view, there is no purpose served by identifying the information that can be requested via the application form (beyond the general description in Rule 4901:1-27-05(A)) in view of the fact that the application form can – and, in fact, does – require that the applicant provide information beyond that specifically identified in the rule. Simply stated, the Commission does not need a rule telling itself what information the application forms can require, particularly when the information that can be required is not limited to the information identified in the subparagraphs of the rule and when the applicant, by rule, has to complete the application form, whatever it requires. Accordingly, Dominion Retail believes that the subparagraphs of proposed Rule 4901:1-27-05(B) should be eliminated. This measure would, in no way, change the information an applicant has to provide, but would tidy up the inconsistencies that currently exist.

Proposed Rule 4901:1-27-08 Protective orders.

Dominion Retail supports Staff's proposal to allow financial exhibits to certification and renewal certification applications to be filed under seal without the need for an accompanying motion for a protective order and also endorses Staff's proposal to extend the protection for six years from the date the certificate or renewal certificate is issued. However, as noted in Dominion Retail's comments regarding proposed Rule 4901:1-27-05, the designations "Financial Exhibit 1," "Financial Exhibit 2," and "Financial Exhibit 3" that appear in proposed Rule 4901:1-27-08(A) are not consistent with designations specified on the application forms for the historical and projected financial exhibits for which protection is customarily granted. Thus, the proposed rule should be revised by replacing the references to the "Financial Exhibits" with references to application Exhibits C-3 and C-5, or, alternatively, with a generic reference to exhibits containing confidential financial information. The Commission may find the latter to be preferable because it would permit changes to be made to the application form without changing the rule.

In addition, although Dominion Retail assumes that the proposed rule is intended to apply to financial exhibits filed in connection with both initial certification applications and renewal certification applications, because this rule appears before the rule relating to renewal applications and refers only to the issuance of a "certificate," there could be some confusion in this regard. Thus, Dominion Retail suggests that the rule be revised to provide that financial exhibits filed under seal will be "will be afforded protective treatment for a period of six years from the date of the certificate or renewal certificate for which the information is being provided."

Proposed Rule 4901:1-28-04 Opt-out disclosure requirements.

Staff has proposed inserting, as Rule 4901:1-1-28-04(A)(1), a requirement that the envelope or postcard transmitting the opt-out notice display the statement: "important natural gas aggregation information." Dominion Retail has no problem with including this statement, but notes that the first letters of the words are lower case, whereas words in notices of this type would typically begin with capital letters. Dominion Retail suspects that lower case letters were used to comply with Legislative Service Commission OAC style requirements and is aware that a similar issue arose in connection with utility bill formats in Case No. 11-4910-AU-ORD, where the revised rules used lower case for governmental agency names (*i.e.*, the "public utilities commission of Ohio" and the "Ohio consumers' counsel") and expressed the agencies' business hours in words rather than numbers (*i.e.*, "eight a.m." and "five p.m.").

In reviewing proposed bill formats submitted in response to these rules, Staff took the position that the information had to be presented in the precise form specified in the rules, notwithstanding that the information was substantively identical and that the form required by the rule simply looked odd. Upon a motion a motion for waiver filed by Columbia Gas of Ohio, Inc., the Commission ultimately permitted utilities to use the more customary method of displaying these names (the "Public Utilities Commission of Ohio" and the "Ohio Consumers' Counsel") and hours (8:00 a.m. and 5:00 p.m.),[2] but not until after a number of utilities had printed bill stock using the exact form specified in the rules. The Commission went on to find that any utility wishing to make the same changes referred to in its finding and order to any of the rules referenced in Case No. 11- 4910-AU-ORD need not file for a waiver.

[2] *See* Case No. 11-4910-AU-ORD (Finding and Order dated May 9, 2012).

To avoid a repeat of this exercise, Dominion Retail urges the Commission to grant a similar blanket waiver in its order adopting rules in this case, providing, as in Case No. 11-4910-AU-ORD, that where the departure from the language in the rule "is strictly limited to changes in capitalization and numeric references, which do not change the intent, application, or structure of the required language," companies may utilize the more typical format for required notices and statements.

Proposed Rule 4901:1-29-06 Customer enrollment and consent.

In reviewing the proposed rule, Dominion Retail noticed that the title of subparagraph (D)(6)(d) – "Uniform" – has nothing to do with the subject matter of this provision, which is the requirement that door-to-door solicitors display a valid photo identification of the approved retail natural gas supplier or governmental aggregator he or she represents. Thus, Dominion Retail suggests that the heading of this subparagraph be changed to "Photo Identification."

Proposed Rule 4901:1-29-11 Contract Disclosure.

Proposed Rules 4901:1-29-11(L) and (M) suffer from the same stylistic problem discussed in Dominion Retail's comments on Rule 4901:1-1-28-04(A)(1). Proposed Rule 4901:1-29-11(L) requires that contracts contain a statement that if a customer's complaint is not resolved after contacting the supplier of governmental aggregator, the customer may contact the Commission for assistance, while proposed Rule 4901:1-29-11(M) specifies the manner in which contact information for OCC is to be presented in the contract. In both instances, the first letters of the agency name are lower case and the hours of operation are presented in words rather than numbers, whereas the current rules present this information in the more typical format. Consistent with its comments regarding Rule 4901:1-28-04(A)(1), Dominion Retail urges the

Commission to grant a blanket waiver to permit the agency names to be capitalized and to present the hours of operation in numeric format.

Proposed Rule 4901:1-29-12 Customer billing and payment.

As a result of the bill format case, current Rule 4901:1-29-12(B)(12), which requires the Commission and OCC contact information be included on bills, already specifies the same format that the Staff proposes for presenting this information in proposed Rules 4901:1-29-11(L) and (M). Thus, Dominion Retail's recommendation regarding this rule is the same as its above recommendation for proposed Rules 4901:1-29-11(L) and (M).

Proposed Rule 4901:1-29-13 Coordination between natural gas companies and retail natural gas suppliers and governmental aggregators.

In proposed Rules 4901:1-29-13(D)(2), (3), and (4), Staff has replaced the current references to a customer's return to "regulated sales service" with the phrase "a natural gas company's applicable tariff service." Dominion Retail believes this new language is somewhat ambiguous and that the better terminology would be a reference to a return to "a natural gas company's default commodity service."

Proposed Rule 4901:1-34-05 Stipulations.

Staff proposes to replace the references in Rule 4901:1-34-05(A) to "settlement agreements" resolving issues raised by Rule 4901:1-34-03 Staff notices of probable noncompliance with references characterizing these agreements as "stipulations." No explanation for this proposed change was provided in the entry. Dominion Retail does not believe that these two terms are always interchangeable, and the description of stipulations set forth in Rule 4901-1-30, OAC, coupled with the fact that an officer of the company may sign the

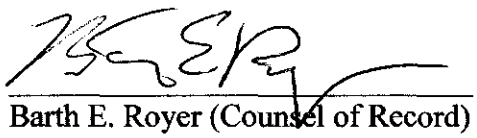
document in question, tends to suggest that "settlement agreement" is, indeed, the more apt term in this context. However, if this change is to be made, a similar change should be made to Rule 4901:1-34-05(B), which now uses the term "settlement agreement."

Dominion Retail would also note that the Staff proposal to move the requirement that the agreement be reduced to writing from the end of the first sentence of Rule 4901:1-34-05(A) to a position following the colon after the opening clause has rendered the sentence unreadable. The current position of this requirement is correct and should not be disturbed.

ATTACHMENT C

Attachment C to the November 7, 2012 contains the business impact analysis required by the Common Sense Initiative. Dominion Retail has no comments with respect to this analysis at this time.

Respectfully submitted,



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