BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust Rider DR-IM and Rider AU for 2014 SmartGrid Costs.	)))	Case No. 15-883-GE-RDR

OPINION AND ORDER

The Commission, having considered the evidence admitted at hearing, and being otherwise fully advised, hereby issues its Opinion and Order.

APPEARANCES:

Amy B. Spiller and Elizabeth H. Watts, 139 East Fourth Street, Cincinnati, Ohio 45202, on behalf of Duke Energy Ohio, Inc.

Mike DeWine, Ohio Attorney General, by Thomas McNamee and Natalia Messenger, Assistant Attorneys General, 180 East Broad Street, Columbus, Ohio 43215, on behalf of Staff of the Commission.

Bruce J. Weston, Ohio Consumers' Counsel, by Terry Etter, Assistant Consumers' Counsel, 10 West Broad Street, Suite 1800, Columbus, Ohio 43215, and Kimberly W. Bojko, Carpenter Lipps & Leland LLP, 280 North High Street, Suite 1300, Columbus, Ohio 43215, on behalf of the residential utility customers of Duke Energy Ohio, Inc.

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

Jennifer L. Spinosi, 21 East State Street, Suite 1950, Columbus, Ohio 43215, on behalf of Direct Energy Services, LLC and Direct Energy Business, LLC.

OPINION:

I. Background

Duke Energy Ohio, Inc. (Duke or Company) is an electric light company and a natural gas company, as defined in R.C. 4905.03, and a public utility under R.C. 4905.02. Duke supplies electricity to approximately 700,000 customers and natural gas to approximately 420,000 customers in southwestern Ohio, all of whom will be affected by Duke's application. (Duke Ex. 1 at 1.)

In *In re Duke Energy Ohio, Inc.*, Case No. 08-920-EL-SSO, et al. (*2008 ESP Case*), Opinion and Order (Dec. 17, 2008), the Commission approved a stipulation that, inter alia, provided a process for recovering costs associated with the electric SmartGrid system, designated Rider Distribution Reliability - Infrastructure Modernization (Rider DR-IM). The stipulation provided that, each year, Duke shall file for approval of Rider DR-IM adjustments, subject to due process, including a hearing. In *In re Duke Energy Ohio, Inc.*, Case No. 07-589-GA-AIR, et al. (*Gas Rate Case*), Opinion and Order (May 28, 2008), the Commission authorized Duke to file deployment plans for installation of an automated gas meter reading system, which would share the SmartGrid communications technology. The plan provided that Duke would recover costs related to the deployment plans through Rider Advanced Utility (Rider AU).

In *In re Duke Energy Ohio, Inc.*, Case No. 09-543-GE-UNC, et al., Opinion and Order (May 13, 2010), the Commission approved a stipulation that set the initial rates for Riders DR-IM and AU. Most recently, in *In re Duke Energy Ohio, Inc.*, Case No. 14-1051-GE-RDR, Opinion and Order (Apr. 8, 2015), the Commission authorized the current rates as follows: for Rider DR-IM, $6.07 and $9.01 per bill per month for residential customers and nonresidential customers, respectively; for Rider AU, $1.46 per meter per month; and, for gas-only customers, a credit of $1.28 per meter per month.

On June 4, 2015, Duke filed its application and supporting testimony requesting authority to adjust Riders DR-IM and AU for SmartGrid deployment, pursuant to the process approved in the *Gas Rate Case* and the *2008 ESP Case* (Duke Ex. 1). Motions to intervene were filed by Direct Energy Services, LLC and Direct Energy Business, LLC (collectively, Direct Energy) on June 11, 2015, the Ohio Consumers' Counsel (OCC) on June 17, 2015, and Ohio Partners for Affordable Energy (OPAE) on June 25, 2015. The attorney examiner granted the motions to intervene filed by Direct Energy, OCC, and OPAE by Entry dated September 21, 2015.

On November 13, 2015, Staff filed its review and recommendations in the case (Staff Ex. 1), and comments were filed by OCC (OCC Ex. 1). On November 25, 2015, reply comments were filed by Duke (Duke Ex. 5).

On January 6, 2016, Duke, Staff, OPAE, and OCC (collectively, Signatory Parties) filed a stipulation and recommendation (Stipulation) (Jt. Ex. 1). The Signatory Parties maintain that the Stipulation resolves all of the issues raised in this proceeding. Thereafter, on January 12, 2016, Direct Energy filed a letter stating that it does not oppose the stipulation.

The hearing in this matter was initially scheduled to commence on November 19, 2015. Following a request by the parties to extend the procedural schedule in this case, the hearing was held, as rescheduled, on January 27, 2016. At the hearing, Staff witness James W. Schweitzer testified in support of the Stipulation.

II. Summary of the Application, Staff Review, and Comments

The following is a summary of the application, Staff's review and recommendations, and the relevant comments that were submitted in the case.

A. Application

Duke requests an increase for Rider DR-IM to $6.31 and $9.39 per bill per month for residential customers and nonresidential customers, respectively. According to Duke witness Peggy A. Laub, the proposed rates for Rider DR-IM are below the proposed caps agreed to in *In re Duke Energy Ohio, Inc.*, Case No. 13-1141-GE-RDR, Opinion and Order (Apr. 9, 2014). For Rider AU, Duke requests that the charge be decreased to $1.30 per meter per month and, for gas-only customers, there be a credit of $1.14 per meter per month. (Duke Ex. 3 at 9-10, 14-15; Duke Ex. 4 at 1, 9-10, 14-15.)

In support of Duke's application, Duke witness Donald L. Schneider states that the field deployment portion of the Company's grid modernization program was complete as of December 31, 2014. Mr. Schneider explains that 2014 was the fifth year for full-scale, advanced metering infrastructure (AMI) deployment. He further explains that, through December 31, 2014, Duke has installed a total of 720,320 electric meters, 435,670 gas modules, 12,978 automated meter reading gas modules, and 143,431 communications nodes, and has certified 706,593 of the electric meters installed and 440,394 of the gas modules installed. Meters are certified to identify when the meter has successfully been commissioned and verified and the meter data is ready to be used for billing. Duke's AMI deployment is now complete. Since the AMI deployment is complete, Duke's project team has turned over continued and future installations, certifications, and communications network fine-tuning to Duke's operations personnel. (Duke Ex. 2 at 3-4.)

With respect to distribution automation (DA) deployment through December 31, 2014, Duke has installed and/or automated with two-way communications capabilities a total of 1,152 system devices inside substations and over 6,723 system devices on distribution circuits. These numbers put the total planned DA deployment at 100 percent complete. (Duke Ex. 2 at 4.)

Mr. Schneider also explains Duke's performance with respect to the system average interruption frequency index (SAIFI), which is a utility industry standard for reporting the average number of sustained, greater than five minutes, interruptions per customer per year. In the *2008 ESP Case*, Duke committed to achieving specified SAIFI targets for each year of deployment. Mr. Schneider states that Duke met or exceeded its SAIFI targets for 2009, 2010, 2011, 2012, 2013, and 2014. (Duke Ex. 2 at 5-6.)

Duke witness Peggy A. Laub provides the revenue requirements for Rider DR-IM and Rider AU, which include the following components: a return on the base rate, depreciation and property taxes, and incremental expenses. Ms. Laub explains that some of the costs of the SmartGrid project are shared between Duke's gas and electric distribution businesses. She further explains that the costs for common equipment are allocated between gas and electric service based on appropriate allocation factors. The development of these allocation factors is based on Duke's determination of the extent to which each type of plant contributes to the gas or electric SmartGrid function. (Duke Ex. 3 at 2-3.)

With respect to the revenue requirements, Ms. Laub states that Duke has not made any changes in the revenue requirement calculations since Duke's last SmartGrid cost recovery filing. Ms. Laub further explains that the revenue requirement calculations reflect the savings generated by DA and SmartGrid projects that Duke agreed to in *In re Duke Energy Ohio, Inc.*, Case No. 10-2326-GE-RDR, Opinion and Order (June 13, 2012). (Duke Ex. 3 at 4-5.)

With respect to the allocation of Rider DR-IM, Ms. Laub explains that, pursuant to the stipulation approved in the *2008 ESP Case*, 85 percent of the revenue requirement is allocable to residential customers and the remaining 15 percent is allocable to nonresidential customers. The allocated revenue is then divided by the number of bills for the residential and nonresidential rate classes. The result of this calculation is a per bill charge of $6.31 for residential customers and $9.39 for nonresidential customers for Rider DR-IM. (Duke Ex. 3 at 9-11.) The Rider AU revenue requirement is allocated based on the total number of bills. The result is a $1.30 charge per bill for all customers, and a per bill credit of $1.14 for gas-only customers. (Duke Ex. 3 at 14-15.)

B. Staff Review and Comments

Staff conducted its audit in this case through a combination of document review, interviews, and interrogatories. In its audit, Staff found transactions that it recommends should be deducted from the Company's revenue requirement.

Staff found that Allocated Supervision & Engineering (Allocated S&E) expenses in the amounts of $62,253.41 and $465.59 were included in Rider DR-IM and Rider AU, respectively. Staff believes that these allocated labor expenses would have been incurred by Duke regardless of whether there was a grid modernization program and are not incremental to base rates. Therefore, Staff recommends removal of these amounts from

Rider DR-IM and Rider AU. (Staff Ex. 1 at 1-2.) In its reply comments, Duke states that it accepts Staff's recommendations (Duke Ex. 5 at 2-3).

Staff states that several invoices, totaling $152,950.00, were for charges to Rider DR-IM described as "Repair Out of Warranty." With respect to these invoices, Staff notes that the grid modernization rider was established to recover costs associated with the initial installation of the SmartGrid, that "Repair Out of Warranty" charges are maintenance costs, not costs for the initial installation of the SmartGrid, and that maintenance costs are included in base rates. Therefore, Staff recommends a reduction to Rider DR-IM for the $152,950.00 amount. (Staff Ex. 1 at 1-2.) In response, Duke states that, during the deployment of grid modernization, some of the equipment required replacement outside of its warranty period and that the need to replace this equipment is included in the rider as the deployment process is accounted for. Duke states that these charges were not included in rates during the last base rate proceeding and are not currently recovered in rates; thus, disallowance in the rider will result in no recovery. Duke argues that this is an unfair and inconsistent outcome since this treatment has not been applied in previous rider proceedings. Duke does not agree with this recommendation. (Duke Ex. 5 at 2).

Staff discovered invoices for substation cameras that, as stated by Duke in data request responses, should not have been charged to the SmartGrid project for both Rider RD-IM and Rider AU. Staff recommends reductions of $557.14 and $341.48 to remove the cost of the cameras from Rider DR-IM and Rider AU, respectively. (Staff Ex. 1 at 2.) Duke states that it also disagrees with this recommendation. Duke explains that, in response to previous data requests, the Company stated that the reference to substation cameras on the invoice was incorrect. Duke states that the charges disallowed by Staff are charges for electronic reclosures and primary distribution substation riders and are properly included in this filing. (Duke Ex. 5 at 2.)

In addition, Staff found other expenses in the Company's revenue requirements for both Rider DR-IM and Rider AU that allegedly are unrelated to the grid modernization program. For Rider DR-IM, the expenses totaled $32,835.95 and included: $2,867.44 in meals and entertainment expenses, $16,197.98 in travel expenses, $165.25 for overtime meals (non-travel), $1,349.54 for personal vehicle mileage reimbursements, and $12,255.74 in vehicle and equipment chargeback expenses. For Rider AU, the total was $8,583.74 and the individual charges were: $1,179.04 in meals and entertainment expenses, $6,271.94 in travel expenses, $558.96 in vehicle and equipment chargeback expenses, and $573.80 in personal vehicle mileage reimbursements. Staff notes that many of these amounts were from allocations with no documentation or substantiation that they were directly related to grid modernization activities. Staff believes that there are amounts in base rates for these activities. Therefore, Staff recommends a reduction to Rider DR-IM in the amount of $32,835.95 and a reduction in Rider AU in the amount of $8,583.74. (Staff Ex. 1 at 2-3.) In response, Duke states that the disallowance of various expenses for Rider DR-IM

($32,835.95) and Rider AU ($8,583.74), which Staff claims are undocumented, is unfair. According to Duke, to the extent Staff's auditors are unsatisfied with Duke's responses to data requests, it is necessary for Staff to explain that the responses are unsatisfactory in order for the Company to follow up with a more explanatory response. Duke notes that there are thousands of expense items and that it does not agree with this recommendation. (Duke Ex. 5 at 3.)

Staff recommends that Duke's application, filed on June 4, 2015, be approved, subject to Staff's recommendations. The effect of Staff's recommended adjustments to Rider DR-IM would result in rates of $6.28 per month for residential customers and $9.35 for nonresidential customers, which is an increase of $0.21 for residential customers and $0.34 for nonresidential customers from current rates. The effect of Staff's adjustments to Rider AU would result in a rate of $1.30 per month for all gas and electric customers, with a credit of $1.14 per month for gas-only customers. This compares to a current rate of $1.46 per month with a credit of $1.28 per month for gas-only customers, a reduction of $0.16 and $0.14, respectively. (Staff Ex. 1 at 3.)

OCC states that Duke's SmartGrid program is not living up to expectations regarding the detection and restoration of outages. According to OCC, the switches in Duke's automated distribution equipment known as "self-healing teams," which can reconfigure circuits and re-route electricity around a fault, were operating in only 73.3 percent of the instances where they had opportunities to operate. OCC states that, while there are no specific benchmark standards for the performance of self-healing teams, the differential between AEP Ohio's performance level for self-healing teams, which was 95.9 percent successful in 2014, and Duke's performance level raises serious concerns as to whether Duke's customers are getting what they have paid for. OCC argues that the Commission should disallow cost collection associated with the failed operations of Duke's self-healing teams in 2014, and mandate that Duke achieve a minimum of 90 percent success for self-healing team performance, on an annual basis, before Duke can recover any additional costs related to self-healing teams. In addition, OCC states that there should be specific reporting of the performance of Duke's self-healing teams during major events. OCC argues that it is important to know whether Duke's self-healing teams are working properly during major events, so the benefit to customers can be properly gauged. (OCC Ex. 1 at 2-6.)

In response, Duke states that, without any standard for the performance of self-healing teams in existence, there is no evidence that OCC's comparison of the performance of self-healing teams at AEP Ohio and at Duke is a true apples-to-apples comparison. Duke states that the performance of its self-healing teams, as reported in the Company's Non-Financial Metrics 2014 Annual Report, continues to improve and that its SAIFI, since the beginning of SmartGrid deployment in 2009, shows a 26 percent improvement. In addition, Duke notes that storms vary in intensity and chaos over many different geographic regions and that a major event may occur that does not impact a particular self-healing team location, while a minor event may call upon the operation of more than one self-healing team depending on its type and location. Duke states that it continues to monitor, and correct all missed operations of self-healing teams, not just those that occur during major events. Duke argues that it is not particularly relevant to know if the missed operation of a self-healing team has occurred on a major event day or not and that OCC's comments with respect to self-healing teams are not helpful. (Duke Ex. 5 at 3-5.)

III. Stipulation

As previously stated, a Stipulation signed by the Signatory Parties was filed on January 6, 2016. The Stipulation was intended by the Signatory Parties to resolve all outstanding issues in this proceeding. The following is a summary of the provisions agreed to by the Signatory Parties and is not intended to replace or supersede the Stipulation:

A. Financial and Accounting

(a) The Signatory Parties agree that Duke should collect from customers $55 million associated with the revenue requirement for Rider DR-IM and $6.4 million associated with the revenue requirement for Rider AU for SmartGrid investments and associated expenses made through December 31, 2014. The revenue increases convert to a rate of $6.28 per bill per month for residential electric customers and $9.35 per bill per month for nonresidential electric customers under Rider DR-IM. The revenue increase results in a rate of $1.30 per meter per month under Rider AU; gas-only customers will receive a $1.14 credit per meter per month.

The following table summarizes the proposed rates as compared to the rates currently in place:

Rider DR-IM (Electric)

Residential Current Rate	Residential Proposed Rate	Change
$6.07	$6.28	$0.21
Non- Residential Current Rate	Non- Residential Proposed Rate	Change
$9.01	$9.35	$0.34

Rider AU (Gas)

Current Monthly Rate	Proposed Monthly Rate	Change
$1.46	$1.30	($0.16)
Current Credit	Proposed Credit	Change
($1.28)	($1.14)	$0.14

(b) The Signatory Parties recognize and agree that the monthly charge per residential customer under Rider DR-IM revenue requirement for the applicable period is below the applicable cap established in the Stipulation and Recommendation approved by the Commission in Case No. 13-1141-GE-RDR.

(c) The Signatory Parties further agree that the revenue requirements are based upon rates of return of 7.73 percent (approved by the Commission in Case Nos. 12-1682-EL-AIR, et al. and 12-1685-GA-AIR, et al.). Duke agrees to continue its commitment to include the electric distribution share of operational savings derived from the MetaVu Report. The total savings reduce the amount to be collected from customers by $8.8 million.

(d) In order to mitigate the impact of the rate increases attributable to Rider DR-IM and to better balance the SmartGrid investment risk between Duke and its customers, the Company previously agreed to defer recovery of all or a portion of the following expenses, normally collected through Rider DR-IM, for 2011 and 2012: operations and maintenance, depreciation, and/or property taxes. Such deferrals are incremental to the normal deferral process used in the Rider DR-IM calculations. The amount of the incremental deferrals attributable to costs incurred in 2014 is $4.43 million. Duke shall be allowed to collect $4.43 million from customers through Rider DR-IM for the deferred costs incurred in 2014 to recover the expenses deferred from the 2011 and 2012 recovery periods.

(e) The Company agrees to remove expenses for Allocated S&E totaling $62,253.41 from the amount to be collected from electric customers through Rider DR-IM and $465.59 from the amount to be collected from gas customers through Rider AU, as recommended by Staff in its Review and Recommendation filed on November 13, 2015.

(f) The Company agrees to remove expenses for costs associated with Repairs Out of Warranty, as recommended by Staff, totaling $152,950.00 from the amount to be collected from electric customers through Rider DR-IM.

(g) The Company agrees to remove expenses for various expense items, as recommended by Staff, totaling $32,835.95 from the amount to be collected from electric customers through Rider DR-IM and $8,583.74 from the amount to be collected from gas customers through Rider AU.

B. Self-Healing Teams

(a) The Company will include the following in the SmartGrid Non-Financial Metrics report starting with the 2015 annual report, provided in accordance with the Stipulation and Recommendation approved by the Commission in Case No. 10-2326-GE-RDR:

- Number of successful self-healing team operations during Major Event Days (MEDs)

- Number of unsuccessful self-healing team operations during MEDs

(b) For purposes of reporting self-healing team operational data in the SmartGrid Non-Financial Metrics report, a successful operation is defined as follows: when the self-healing team is called upon to operate, every device that

> comprises the team operates as designed. A failed operation is defined as follows: when the self-healing team is called upon to operate, any single device that comprises the team failed to operate as designed, even if some customer outages were still prevented (due to successful operation of other devices that comprise the team).

(Jt. Ex. 1 at 5-8.)

IV. Consideration of the Stipulation

Ohio Adm.Code 4901-1-30 authorizes parties to Commission proceedings to enter into stipulations. Although not binding on the Commission, the terms of such an agreement are accorded substantial weight. *See Akron v. Pub. Util. Comm.*, 55 Ohio St.2d 155, 157, 378 N.E.2d 480 (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. *See, e.g., Cincinnati Gas & Electric Co.*, Case No. 91-410-EL-AIR (Apr. 14, 1994); *Western Reserve Telephone Co.*, Case No. 93-230-TP-ALT (Mar. 30, 1994); *Ohio Edison Co.*, Case No. 91-698-EL-FOR, et al. (Dec. 30, 1993); *Cleveland Electric Illum. Co.*, Case No. 88-170-EL-AIR (Jan. 31, 1989); *Restatement of Accounts and Records (Zimmer Plant)*, Case No. 84-1187-EL-UNC (Nov. 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:

(a) Is the settlement a product of serious bargaining among capable, knowledgeable parties?

(b) Does the settlement, as a package, benefit ratepayers and the public interest?

(c) Does the settlement package violate any important regulatory principle or practice?

The Supreme Court of Ohio 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, 561, 629 N.E.2d 423 (1994), citing *Consumers' Counsel v. Pub. Util. Comm.*, 64 Ohio St.3d 123, 126, 592 N.E.2d

1370 (1992). Additionally, the Court stated that the Commission may place substantial weight on the terms of a stipulation, even though the stipulation does not bind the Commission. *Consumers' Counsel* at 126.

Staff witness Schweitzer testified in support of the Stipulation stating that it was the product of serious bargaining among knowledgeable and capable parties. Specifically, Mr. Schweitzer states that the process of developing the stipulation was open and was participated in by all of the Signatory Parties. He explains that the Stipulation was achieved by pulling together all of the comments, adjustments made by Staff, and suggestions made by the parties, including OCC, and resulted in a resolution of the issues in this case. (Tr. at 12-13.)

Mr. Schweitzer further explains that the Stipulation, as a package, benefits ratepayers and the public interest. Specifically, he explains that Duke has invested significant dollars in modernizing its electric infrastructure and natural gas infrastructure and that this stipulation results in a lot of benefits going to Duke's customers from those investments, and, at the same time, it results in the Company being able to recover its costs; so, the Stipulation balances both the needs of the Company with the benefits being received by the customers. Finally, Mr. Schweitzer asserts that the Stipulation does not violate any important regulatory principle or practice. (Tr. at 13-14.)

In this case, the Commission finds that the Stipulation is supported by adequate data and information. In addition, the Stipulation represents a just and reasonable resolution of the issues raised in this proceeding, benefits ratepayers and the public interest, and violates no regulatory principle or precedent. Further, we find that the Stipulation is the product of lengthy, serious bargaining among knowledgeable and capable parties in a cooperative process, encouraged by this Commission and undertaken by the parties representing a wide range of interests, including Staff, to resolve the aforementioned issues. (Tr. at 12-14.) Accordingly, the Commission concludes that the Stipulation should be adopted in its entirety.

FINDINGS OF FACT AND CONCLUSIONS OF LAW:

(1) Duke is an electric light company and a natural gas company, as defined in R.C. 4905.03, and a public utility under R.C. 4905.02.

(2) On June 4, 2015, Duke filed its application to adjust Riders DR-IM and AU.

(3) By Entry dated September 21, 2015, Direct Energy, OCC, and OPAE were granted intervention in this matter.

(4) On November 13, 2015, Staff filed its review and recommendations in the case and comments were filed by OCC. On November 25, 2015, reply comments were filed by Duke.

(5) On January 6, 2016, Duke, Staff, OPAE, and OCC filed the Stipulation resolving all of the issues in this proceeding.

(6) The evidentiary hearing was held on January 27, 2016.

(7) The Stipulation meets the criteria used by the Commission to evaluate stipulations, is reasonable, and should be adopted.

(8) Duke should be authorized to implement the new rates for Riders DR-IM and AU consistent with the Stipulation and this Opinion and Order.

ORDER:

It is, therefore,

ORDERED, That the Stipulation filed in this proceeding is approved and adopted. It is, further,

ORDERED, That Duke take all necessary steps to carry out the terms of the Stipulation and this Opinion and Order. It is, further,

ORDERED, That Duke observe all directives set forth in this Opinion and Order. It is, further,

ORDERED, That Duke is authorized to file tariffs, in final form, consistent with this Opinion and Order. Duke shall file one copy in this case docket and one copy in its TRF docket. It is, further,

ORDERED, That the effective date of the new tariffs shall be a date not earlier than the date upon which the final tariff pages are filed with the Commission. 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

Andre T. Porter, Chairman

Lynn Slaby

M. Beth Trombold

Asim Z. Haque

Thomas W. Johnson

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Entered in the Journal

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Barcy F. McNeal

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Secretary