

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the OVEC Generation : Case No. 21-477-EL-RDR
Purchase Rider Audits Required by R.C.
4928.148 for Duke Energy Ohio, Inc., The :
Dayton Power and Light Company, and AEP
Ohio :

**OBJECTIONS AND RESPONSES OF THE DAYTON POWER AND
LIGHT COMPANY D/B/A AES OHIO TO INTERROGATORIES, REQUESTS FOR
PRODUCTION OF DOCUMENTS AND REQUESTS FOR ADMISSIONS
PROPOUNDED UPON DAYTON POWER AND LIGHT COMPANY BY OFFICE OF
THE OHIO CONSUMERS' COUNSEL**

**SECOND SET
(DATED AUGUST 9, 2023)**

The Dayton Power and Light Company d/b/a AES Ohio ("AES Ohio" or the "Company") objects and responds to the Interrogatories, Requests for Production of Documents and Requests for Admissions Propounded Upon Dayton Power and Light Company by Office of The Ohio Consumers' Counsel, Second Set (Dated August 9, 2023), as follows:

GENERAL OBJECTIONS

1. AES Ohio objects to and declines to respond to each and every discovery request to the extent that it seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Ohio Adm.Code 4901-1-16(B).

2. AES Ohio objects to and declines to respond to each and every discovery request to the extent that it is harassing, unduly burdensome, oppressive or overbroad. Ohio Adm.Code 4901-1-16(B) and 4901-1-24(A).

INT-02-007. For each month of the calendar year 2020, with respect to the Company's share of the energy, capacity, and ancillary services of the OVEC units, identify the following, and label responses as "whole plant," "ownership," or "contractual" share.

- a. Total energy produced (in MWh) and market revenues (in dollars) by the Company through sales of its share into PJM markets;
- b. Total capacity provided (in MW) and capacity market revenue earned (in dollars) by the Company through sale of its share into the PJM markets;
and
- c. Total ancillary market revenue earned (in dollars) by the Company through sale of its share into PJM markets (if any).

RESPONSE: General Objections Nos. 2 (unduly burdensome), 5 (inspection of business records), 9 (vague or undefined), 10 (possession of OVEC), 11 (calls for a legal conclusion), and 12 (seeks information that AES Ohio does not know at this time). AES Ohio further objects because the terms "whole plant," "ownership," and "contractual" are not defined. Subject to all general objections, AES Ohio states see OCC 2nd Set – INT 07 Attachment 1.

Witness Responsible: Patrick Donlon

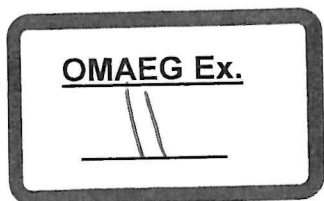
OVEC PJM Charges - 2020

	Total Charge	Ownership MWH	Net Energy Revenue \$	Capacity MW	Net Capacity Revenue \$	Ancillary Revenue \$
January	1,324,995.76	45636	\$ (1,034,334.88)	96.20	\$ (298,220.00)	\$ 7,559.12
February	1,098,961.78	40458	\$ (824,977.44)	96.20	\$ (278,980.00)	\$ 4,995.66
March	902,539.86	33254	\$ (606,953.92)	96.20	\$ (298,220.00)	\$ 2,634.06
April	600,441.01	18792	\$ (313,933.79)	96.20	\$ (288,600.00)	\$ 2,092.78
May	692,317.16	21209	\$ (396,962.76)	96.20	\$ (298,220.00)	\$ 2,865.60
June	1,052,129.43	41029	\$ (830,616.75)	96.50	\$ (212,785.80)	\$ (8,726.88)
July	1,413,575.30	45159	\$ (1,196,465.51)	96.50	\$ (219,878.66)	\$ 2,768.87
August	1,274,770.92	44042	\$ (1,056,978.97)	96.50	\$ (219,878.66)	\$ 2,086.71
September	906,507.38	32640	\$ (694,861.27)	96.50	\$ (212,785.80)	\$ 1,139.69
October	963,340.06	28707	\$ (739,561.08)	96.50	\$ (219,878.66)	\$ (3,900.32)
November	1,138,162.47	42826	\$ (922,818.81)	96.50	\$ (212,785.80)	\$ (2,557.86)
December	1,616,185.29	55597	\$ (1,394,949.49)	96.50	\$ (219,878.66)	\$ (1,357.14)
Total	12,983,926.42	449,349.00	(10,013,414.67)		(2,980,112.04)	9,600.29

INT-02-031. What was the total amount of revenue which DP&L collected from consumers during 2020 under the legacy generation rider?

RESPONSE: General Objections No. 9 (vague or undefined). Subject to all general objections, AES Ohio states \$7,672,590.

Witness Responsible: Patrick Donlon



Duke Energy Ohio
Case No. 21-477-EL-RDR
OCC's Second Set Interrogatories
Date Received: August 23, 2023

OCC-INT-02-001

REQUEST:

Please state the amount of revenue Duke collected through the Legacy Generation Rider in 2020.

RESPONSE: Objection. This Interrogatory is vague as to the meaning of the phrase "amount of revenue Duke collected through [the Rider]." Moreover, the term "revenue" is undefined, and the LGR is intended to recover "prudently incurred costs related to a legacy generation resource," not collect revenue. *See* R.C. 4928.01(A)(42). Assuming the term revenue is intended to mean "prudently incurred costs related to a legacy generation resource," the Company objects as LGR Rider amounts are subject to annual Commission filings, thus making the information requested herein a public record equally accessible to OCC as it is to the Company. Without waiving the above objections, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio billed \$25,028,723 through Rider LGR to its retail electric customers during the months of January through December 2020.

PERSON RESPONSIBLE:

As to Objections: Legal

As to Response: James E. Ziolkowski

**OHIO POWER COMPANY'S RESPONSE TO
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 21-0477-EL-RDR
SECOND SET**

OMAEG Ex.

12

INTERROGATORY

OCC-INT-02-001 Please state the amount of revenue AEP collected through the Legacy Generation Rider in 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that this request is vague and undefined. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. For the amount of revenue AEP Ohio billed through the Legacy Generation Rider in 2020, Please see OCC INT-02-001 Attachment 1

Revenue	Res (Part A)	Part B	C&I (Part A)	Part B	FE Pmts
202001 202001	\$ 615,786.31	\$49,262.91	\$1,063,568.83	\$76,679.19	\$ -
202002	\$ 650,598.95	\$52,047.92	\$1,069,150.95	\$77,081.64	\$ -
202003	\$ 651,864.31	\$52,149.14	\$1,033,879.36	\$74,538.70	\$ 647,711.33
202004	\$ 651,866.77	\$52,149.34	\$ 929,570.85	\$67,018.46	\$1,632,163.43
202005	\$ 652,641.11	\$52,211.29	\$ 887,602.69	\$63,992.72	\$1,671,049.19
202006	\$ 653,435.44	\$52,274.83	\$1,011,191.60	\$72,903.00	\$1,576,922.35
202007	\$ 758,765.38	\$39,246.48	\$1,297,060.68	\$54,613.08	\$1,524,958.70
202008	\$ 757,878.62	\$39,200.62	\$1,306,602.93	\$55,014.86	\$1,626,375.24
202009	\$ 759,401.58	\$39,279.39	\$1,286,974.73	\$54,188.41	\$1,756,597.40
202010	\$ 758,577.47	\$39,236.77	\$1,162,867.21	\$48,962.83	\$1,961,651.33
202011	\$ 757,987.96	\$39,206.27	\$1,101,360.31	\$46,373.07	\$1,955,958.82
202012	\$ 760,380.11	\$39,330.01	\$1,221,590.06	\$51,435.37	\$1,860,619.70
Total	\$ 8,429,184.01	\$ 545,594.97	\$ 13,371,420.20	\$ 742,801.33	\$ 16,214,007.49

*LGR rider collections \$23.1M for 2022.

*FE Payments \$16.2M for 2022.

**OHIO POWER COMPANY'S RESPONSE TO
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 21-0477-EL-RDR
SECOND SET**

CERTIFICATE OF SERVICE

I hereby certify that a service copy of the foregoing Responses to The Office of the Ohio Consumers' Counsel's Second Set of Discovery Request was sent by, or on behalf of the undersigned counsel to the follow parties on this 13th day of September 2023, via e-mail:

/s/ Steven T. Nourse
Steven T. Nourse (0046705)

Email Service:

rdove@keglerbrown.com;

tony.mendoza@sierraclub.org;

megan.wachspress@sierraclub.org;

john.finnigan@occ.ohio.gov;

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tallexander@beneschlaw.com;

trent@hubaydougherty.com;

**OHIO POWER COMPANY'S RESPONSE TO
AUDITOR LONDON ECONOMICS INTERNATIONAL LLC'S
DATA REQUEST
PUCO CASE 21-477-EL-RDR THIRD SET**

OMAEG Ex.

13

INTERROGATORY

LEI-DR-02-021 Please provide in Excel format the total amount of coal burned (in tons) on a monthly basis during the audit period for each OVEC plant separately.

RESPONSE

Please see LEI-DR-02-021- CONFIDENTIAL Attachment 1 for the requested information.

**OHIO POWER COMPANY'S RESPONSE TO
THE PUBLIC UTILITIES COMMISSION OF OHIO'S
AUDITOR LONDON ECONOMICS INTERNATIONAL LLC'S
PUCO CASE NO. 21-0477-EL-RDR SET 1**

OMAEG Ex.

14

INTERROGATORY

LEI-DR-02-006 Please provide in Excel format, for all OVEC coal deliveries, the following information on a monthly basis for the audit period: supplier name, quantity actually purchased and delivered, average unit price paid per ton of coal.

RESPONSE

See LEI-DR-02-006 Confidential Attachments 1 and 2.

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the OVEC Generation : Case No. 21-0477-EL-RDR
Purchase Rider Audits Required by R.C.
4928.148 for Duke Energy Ohio, Inc., The :
Dayton Power and Light Company, and AEP
Ohio :

**OBJECTIONS AND RESPONSES OF THE DAYTON POWER AND LIGHT
COMPANY D/B/A AES OHIO TO THE SECOND SET OF DISCOVERY REQUESTS
PROPOUNDED UPON AES OHIO BY CITIZENS UTILITY BOARD OHIO & UNION
OF CONCERNED SCIENTISTS**

Pursuant to Ohio Adm.Code 4901-1-16, 4909-1-19, and 4901-1-20, The Dayton Power and Light Company d/b/a AES Ohio ("AES Ohio" or the "Company") objects and responds to the Second Set of Discovery upon The Dayton Power and Light Company d/b/a AES Ohio by Citizens Utility Board Ohio & Union of Concerned Scientists, as follows:

GENERAL OBJECTIONS

1. AES Ohio objects to and declines to respond to each and every discovery request to the extent that it seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Ohio Adm.Code 4901-1-16(B).
2. AES Ohio objects to and declines to respond to each and every discovery request to the extent that it is harassing, unduly burdensome, oppressive or overbroad. Ohio Adm.Code 4901-1-16(B) and 4901-1-24(A).
3. AES Ohio objects to each and every discovery request to the extent that it seeks information that is privileged by statute or common law, including privileged communications between attorney and client or attorney work product. Ohio Adm.Code 4901-1-16(B). Such

with no guide for the court to determine if the voluminous response is what the party sought in the first place.” *Id.*, 272 N.E.2d at 878.

7. AES Ohio objects to each and every discovery request to the extent that it calls for information that is not in AES Ohio’s current possession, custody, or control or could be more easily obtained through third parties or other sources. Ohio Adm.Code 4901-1-19(C) and 4901-1-20(D). AES Ohio also objects to each and every discovery request that seeks information that is already on file with the Public Utilities Commission of Ohio or the Federal Energy Regulatory Commission. To the extent that each and every discovery request seeks information available in pre-filed testimony, pre-hearing data submissions and other documents that AES Ohio has filed with the Commission in the pending or previous proceedings, AES Ohio objects to it. Ohio Adm.Code 4901-1-16(G).

8. AES Ohio reserves its right to redact confidential or irrelevant information from documents produced in discovery. All documents that have been redacted will be stamped as such.

9. AES Ohio objects to each and every discovery request to the extent that it is vague or ambiguous or contains terms or phrases that are undefined and subject to varying interpretation or meaning, and may, therefore, make responses misleading or incorrect.

10. AES Ohio objects to any discovery request to the extent that it calls for information not in its possession, but in the possession of AES Ohio’s unregulated affiliates.

11. AES Ohio objects to each and every discovery request to the extent that it calls for a legal conclusion, and thus seeks information that cannot be sponsored by a witness.

02-001 Please produce copies of all discovery requests received by the Company from other parties in this proceeding, and the Company's responses to that discovery.

RESPONSE: Please see "C&U – 02-001 Attachment 1 – Confidential"

02-002 Provide the Company's Power Participation Ratio for each month of the audit period (2020).

RESPONSE: Please see the attachment provided in response to LEI DR-03-003 in LEI's 1st set of discovery.

02-003 Provide a copy of the OVEC ICPA with all amendments.

RESPONSE: Please see the attachment provided in response to LEI DR-06-001 in LEI's 1st set of discovery.

02-004 Regarding the OVEC Operating Committee:

- a) Provide official documentation that describes the role and responsibilities of the OVEC Operating Committee.**
- b) Provide the dates of all meetings that occurred in 2020 and provide a summary of what was discussed at each meeting.**
- c) Provide all annual summary documents that discuss the economic performance of the OVEC units in 2020.**

RESPONSE:

a) Please refer to Section 9.05 of the Amended and Restated Inter-Company Power Agreement, as previously provided, for a description of the role and responsibilities of the OVEC Operating Committee.

b) Please see the company's response to LEI DR-01-006 in LEI's 1st set of discovery.

c) Please see the company's response to LEI-DR-05-005 in LEI's 1st set of discovery.

02-005 Provide a copy of OVEC's Operating Procedures.

RESPONSE: Please see the company's response to LEI DR-01-005 in LEI's 1st set of discovery.

RESPONSE:

a) through c): Please see “C&U - 02-008 Attachment 1 – Confidential”

d) N/A

02-009 For each month in 2020, and for each of the OVEC Units, identify the:

- a) Capacity factor**
- b) Availability**
- c) Heat rate**
- d) Forced outage rate**
- e) Unforced outage rate**
- f) Fixed operating and maintenance (“O&M”) cost**
- g) Variable O&M cost**
- h) Fuel Cost**

RESPONSE: Please see the below previously provided attachments:

- a) LEI DR 05-005 - set 1
- b) LEI-DR-05-005 – set 1 and LEI-DR-05-009 -set 4
- c) LEI-DR-05-005- set 1
- d) LEI-DR-05-005 - set 1
- e) LEI-DR-05-005 - set 1
- f) LEI-DR-05-007 – set 1
- g) LEI-DR-05-007 – set 1
- h) LEI-DR-02-009- set 1

02-010 Provide any analysis conducted by, on behalf of, or made available to the Company with respect to the termination of the ICPA during the audit period of 2020.

RESPONSE: The Company does not have the analysis requested in 02-010.

02-011 State whether the Company has engaged in any negotiations or discussions with other OVEC sponsoring companies or equity owners regarding early termination of the ICPA and/or retirement of the OVEC Units? If yes, describe any negotiations or discussions between OVEC sponsoring companies regarding early termination of the ICPA or retirement of the OVEC Units, if any. If not, why not.

02-015 Regarding the Company's role in unit commitment and dispatch practices for OVEC:

- a) Indicate whether any Company entity performs unit commitment and dispatch practices on behalf of OVEC.**
- b) Indicate whether the Company engaged in any way in oversight or evaluation of the unit commitment and dispatch practices of the OVEC units.**
- c) Indicate whether the Company has any role or knowledge of the unit commitment and operational decisions of the OVEC units.**
- d) State whether Sponsoring Companies have the right or ability to request that OVEC commit its units with an Economic status.**

RESPONSE:

- a) Each PJM Company in OVEC manages its own respective PJM capacity position and offers their respective share in the RPM capacity auctions. For the Energy Market in PJM, OVEC is responsible for making the daily offers in PJM on behalf of all of the PJM owners.
- b) The Company representative in the OVEC Operating Committee participates and votes on issues presented at the Operating Committee level. For the Energy Market in PJM, OVEC is responsible for making the daily offers in PJM on behalf of all of the PJM sponsor companies.
- c) The Company representative in the OVEC Operating Committee participates and votes on issues presented at the Operating Committee level.
- d) No. The procedures for the scheduling of available energy are set by the Operating Committee. Pursuant to Section 9.05 of the Amended and Restated Inter-Company Power Agreement among OVEC, the Company and the other parties thereto, "[t]he decisions of the Operating Committee, including the adoption or modification of any procedure by the Operating Committee pursuant to this Section 9.04, must receive the affirmative vote of at least two-thirds of the members of the Operating Committee present at any meeting." Pursuant to procedures codified in Part E.1 of the "Operating Procedures" of the such Operating Committee, the unanimous approval of the Operating Committee (excluding OVEC's representative) is required to change the commitment status of "Must Run" with respect to the offer of the "PJM Sponsors' aggregate share of reserved Available Energy into PJM's Day-Ahead Energy Market," with limited exceptions expressly set forth therein, including with respect to Clifty Unit No. 6 during ozone season.

02-018 Regarding OVEC's unit commitment decisions during 2020:

- a) Provide the daily commitment status for each OVEC unit for each day in 2020.
- b) Produce all daily economic analyses that the Company used to inform OVEC's unit commitment decisions for the OVEC units in 2020 in native machine readable Excel format.
- c) State whether the Company provided the analysis referenced in part (b) to OVEC for each month 2020.

RESPONSE:

- a) Please see confidential attachment "C&U - 02-018 Attachment 1 - Confidential", which details the hourly unit commitment status for each OVEC-IKEC operating units during 2020. The data is not available in a daily format, given the units are committed on an hourly basis.
- b) None
- c) N/A

02-019 Regarding any changes in OVEC's unit commitment process in 2020:

- a) Describe any changes in 2020 to any of the following: OVEC's process for determining whether to self-schedule a generator in the day-ahead market at the unit's minimum operating level, and allow the unit to dispatch economically above the minimum level; OVEC's process for determining whether to economically dispatch a generator in the day-ahead energy market and the factors that OVEC considers in its unit commitment decision-making process.
- b) Provide all communications between the Company and OVEC regarding any changes to OVEC unit commitment process in 2020.
- c) Indicate whether the Company made any recommendations to OVEC regarding the use of a new unit commitment system. If yes, provide the timeline of such conversations.
- d) Explain why changes to OVEC' unit commitment process were implemented in 2020.
- e) If changes were implemented but not sustained, explain why OVEC decided to return to the prior unit commitment process, and provide the dates that such changes were made.

RESPONSE:

- a) Objection. This request is overbroad, compound, vague, ambiguous, and calls for an improper narrative response. Subject to the foregoing, during 2020, the default method for offering OVEC-IKEC generating units into the PJM Day-Ahead Market was to offer them based on each unit's variable unit cost offer, but with a commitment status of "Must Run." However, an additional

02-021 Regarding the Company's role in OVEC's decision to install environmental projects to comply with the Effluent Limitation Guidelines and the Coal Combustion Residuals Rule.

- a) State the Company's role and responsibility in the decision-making process.**
- b) Indicate whether the Company has access to any data or analysis used by OVEC to make the decision to install the environmental upgrades.**
- c) Indicate whether the Company reviewed any data or analysis used by OVEC to make the decision to install the environmental upgrades.**
- d) Indicate whether the Company had any input or vote over the decision by OVEC to install the environmental upgrades.**

RESPONSE:

- a) A Company representative serves on the OVEC Environmental Subcommittee. OVEC and its environmental employees were and are responsible for completing all environmental related cost estimates. As participants in the Environmental Subcommittee, Company representatives were provided environmental information prior to it going to the OVEC board but were not directly involved and did not have input in the analysis or recommendations.
- b) See response to a, please also see "C&U - 02-021 Attachment 1 –Confidential."
- c) See response to a; additionally, major capital expenditures require voting and approval by the entire OVEC Board of Directors.
- d) See response to a.

02-022 Produce the minutes from each meeting of the OVEC Board of Directors held during 2020.

RESPONSE: Please see confidential attachment "C&U - 02-022 Attachment 1 - Confidential" for the requested minutes from each of four meetings of the OVEC Board of Directors held during 2020.

02-023 Produce the minutes from each meeting of the IKEC Board of Directors held during 2020.

RESPONSE: Please see confidential attachment "C&U - 02-023 Attachment 1 - Confidential" for the requested minutes from each of four meetings of the IKEC Board of Directors held during 2020.

02-024 Produce the company's most recent fundamentals forecast of energy market prices, as well as the two forecasts prior to that.

RESPONSE: AES Ohio no longer makes fundamental forecasts of energy market prices.

02-025 Produce any comparisons or other evaluations of the amounts or prices paid for energy and capacity from OVEC in 2020 to market prices or other benchmarks.

02-031 Regarding the Company's purchase of FirstEnergy Solution's OVEC entitlement during the audit period (2020), provide the following:

- a) Company's Share (as % of OVEC whole)**
- b) Capacity (MW)**
- c) Energy (GWh)**
- d) Duration of the entitlement**

RESPONSE: The Company did not purchase FirstEnergy share. Because FirstEnergy's share of capacity was pre-sold into PJM via the capacity auction process, a proportional share of the FirstEnergy's revenue was credited to the Company, reducing the net costs to Company customers. FirstEnergy's share of energy was also proportionally made available to all other Sponsoring Companies and that portion of the revenues from the sales of that energy into PJM markets that were credited to AES Ohio also reduced the net costs to Company customers.

- a) The Company's ownership share never changed from 4.9%. The amounts of incremental capacity and energy revenues credited to the Company and associated with FirstEnergy's ownership share was .2498%.
- b) Of the capacity owned by FirstEnergy and presold into PJM markets, the revenue from about 5.3 MW was credited to AES Ohio which ultimately gets reflected in the LGR.
- c) Of the share of net energy that FirstEnergy would ordinarily be entitled to, about 7.736 GWh of net energy was sold into PJM during the audit period with revenues credited to AES Ohio which ultimately gets reflected in the LGR.
- d) During the audit period, this arrangement was in effect between January 1, 2020, and May 31, 2020.

CERTIFICATE OF SERVICE

Pursuant to Ohio Adm.Code 4901-1-18, I certify that a copy of the foregoing was served upon the following parties by electronic mail on April 22, 2022.

Staff of the Commission

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Sierra Club

Robert Dove	rdove@keglerbrown.com
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/s/ Randall V. Griffin

Randall V. Griffin (0080499)

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

1/17/2024 10:29:00 AM

in

Case No(s). 21-0477-EL-RDR

Summary: Exhibit OMAEG Exhibit 10, 11, 12, 13, 14, and 15. electronically filed by
Mr. Ken Spencer on behalf of Armstrong & Okey, Inc. and Grubaugh, Valerie.