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Attorney for the Commission Staff

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF )	
INTERMOUNTAIN GAS COMPANY FOR )	CASE NO. INT-G-17-07
AUTHORITY TO IMPLEMENT AN )	
INFRASTRUCTURE INTEGRITY )	COMMENTS OF THE
MANAGEMENT MECHANISM )	COMMISSION STAFF
)	
)	
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**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Sean Costello, Deputy Attorney General, and in response to the Notice of Modified Procedure issued in Order No. 34008 on March 14, 2018, in Case No. INT-G-17-07, submits the following comments.

### BACKGROUND

On December 18, 2017, Intermountain Gas Company applied for authority to implement an Infrastructure Integrity Management Mechanism (IIMM). The Application included the Company's proposed rate schedule and asked that the Commission process the case by Modified Procedure.

The Company asserts the IIMM is a cost recovery mechanism designed to allow the Company to accelerate the replacement of aging infrastructure, to mitigate the increasing impact of regulation on the Company's capital and operations and maintenance (O&M) budgets, and to

more proactively address safety issues on its system. Application at 3. The Company believes the IIMM is “an integral part of its mission to provide safe and reliable natural gas service.” *Id.*

According to the Company, state utility commissions across the country have granted approval to “gas utility companies to implement some form of integrity management and infrastructure replacement programs,” the common feature of which is safe and reliable service. *Id.* at 4. Likewise, the Company is committed to safe and reliable service, and works to proactively identify and remove risks to its system. *Id.*

The Company describes its programs to proactively remove and replace pipe that has a risk of failure. *Id.* The Company uses relative risk models to manage and assess the risk of failures based on age, material, operating pressure, damage history, and other considerations, and based on the outputs, the Company prioritizes infrastructure replacement projects within its total capital investment demands. *Id.* The Company states it would like to accelerate replacement projects, but budget limitations “often only allow the Company to maintain a more modest replacement schedule.” The Company anticipates the proposed IIMM will enable it to accelerate the replacement programs and “stay ahead of schedule.” *Id.* As an example, the Company discusses its program to replace Aldyl-A pipe. *Id.* at 5.

The Company explains it must make certain capital investments to satisfy federal, state, and local requirements, and sometimes must increase O&M spending and add personnel for safety initiatives. *Id.* The Company asserts this capital and O&M spending can “challenge [its] financial situation as [it does] not provide the necessary supporting revenues.” *Id.* The Company provides examples of projects that “contribute to budgetary constraints and compete with other necessary capital investment projects,” such as a proposed rule which would require the use of automatic and remote controlled shutoff valves on transmission lines, and the Company’s hiring of additional employees to help comply with federal and state laws. *Id.* The Company states that including these capital projects in the IIMM would “give the Company more flexibility to concurrently pursue these pipeline related capital investments while also implementing other necessary capital expenditures.” *Id.*

The Company explains the IIMM would not include capital investment associated with incremental growth on the Company’s system, and the rate base and expenses embedded in the Commission-approved IIMM charge would switch from the IIMM to general base rates through future general rate cases. *Id.* at 6.

The Company explains how the proposed IIMM would work. Specifically, the Company would consult the Commission's Pipeline Safety Division about the projects and expenses the Company seeks to recover through the IIMM. *Id.* at 7-8. The Company would then propose an IIMM revenue requirement for allocation to each rate class based on the allocation of base rate revenues from the Company's most recent general rate case. *Id.* The IIMM charge would equal the allocated IIMM revenue requirement divided by normalized volumes from the Company's Purchased Gas Adjustment (PGA). *Id.* Each year in May, the Company would ask the Commission to update the IIMM charge, with the new prices to take effect October 1. *Id.* The Company provides examples of how it would calculate the above components. *See id.* Exhibit 2.

The Commission issued a Notice of Application and set a deadline for petitions to intervene. Order No. 33959. The Commission granted the Alliance of Western Energy Consumers' (AWEC)<sup>1</sup> petition to intervene. Order No. 33981.

## STAFF REVIEW

Staff analyzed the Company's Application and recommends the Commission deny the Company's request for an IIMM. While Staff supports the Company's work to maintain safe and reliable service by replacing Aldyl-A pipe and upgrading other infrastructure, Staff concludes that these costs are more appropriately established and recovered through traditional ratemaking in general rate cases rather than through an annual cost recovery mechanism as proposed by the Company. Further, the costs that the Company proposes to fund through the IIMM are different from the costs the Commission has approved for recovery in other annual adjustment mechanisms: these costs are not unpredictable or volatile, they do not remove the disincentive for energy efficiency, they are within the Company's ability to plan and manage, they do not present an urgent, immediate need for replacement (due to the absence of cast iron and unprotected steel pipes, as discussed further below). To the contrary, these types of known, predictable capital expenditures can be included for recovery in a general rate case, and the Company has the financial ability and access to capital to fund these projects between rate cases.

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<sup>1</sup> Formerly Northwest Industrial Gas Users (NWIGU). NWIGU merged with the Industrial Customers of Northwest Utilities, which then changed its name to AWEC.

## **Staff's Review of the Need for the IIMM**

### *Infrastructure Costs Should be Recovered in General Rate Cases*

Staff does not believe that an annual adjustment mechanism is the proper recovery method for large infrastructure projects. Staff believes that prudence and recovery of infrastructure costs are best addressed through traditional ratemaking in a general rate case where all expenses, rate base, and impacts on the Company's return on equity can be examined. In addition, annual adjustment mechanisms lessen the incentive for utilities to control costs.

Other utilities in Idaho have successfully used rate cases to seek recovery for infrastructure replacement similar to the projects Intermountain discusses in this case. Avista has been replacing its Aldyl-A pipe for several years and has not proposed an annual adjustment mechanism to recover those costs. Instead, Avista files regular rate cases to fund this ongoing project. *See* Case Nos. AVU-G-12-07, AVU-G-17-01. Staff supports this method of cost recovery and does not believe it has harmed Avista's financial viability.

The Commission has never approved an open-ended, ongoing, annual cost recovery mechanism for infrastructure upgrade projects similar to what Intermountain has requested in this case. Because the Company has only filed one general rate case in the last 30 years, Staff does not believe an inability to recover costs is an adequate explanation for the IIMM need. The Company could file a rate case sooner. Staff also does not believe the IIMM should be adopted to further discourage rate case filings. Greater familiarity with the Company's operational and accounting practices is needed before recommending approval of an unprecedented mechanism of this magnitude.

### *Volatility and Predictability of Costs*

One reason for implementing an annual cost adjustment mechanism is that expenses are both volatile and highly unpredictable. Staff reviewed the types of project expenses that the Company proposes to recover through the IIMM and does not believe that any of these costs are significantly unpredictable or variable that an adjustment mechanism is justified.

Unpredictable and volatile costs create an issue in traditional ratemaking when actual costs vary significantly from the revenue requirement embedded in base rates. Power and gas supply costs are a good example. Idaho Power requested the implementation of its Power Cost



Adjustment (PCA)<sup>2</sup> after Idaho Power had previously been granted approval for two emergency surcharges to meet volatile and unpredictable power supply costs in drought years.<sup>3</sup> The Commission agreed that the circumstances warranted an annual adjustment and wrote:

We find that the current system of normalizing power supply costs and granting Idaho Power a surcharge during drought years is defective because it is unpredictable...Presently, Idaho Power must take the initiative to seek a drought related surcharge when it believes its financial condition has deteriorated to the point where additional rate relief is critical.

Order No. 24806 at 5. The Commission emphasized “that our decision [to adopt a PCA] is limited to the unique circumstances of Idaho Power's highly variable power supply costs.” *Id.* Thus, a driver for the Commission’s adoption of Idaho Power’s PCA was the highly unpredictable and volatile nature of power supply costs and the resulting financial impact on the Company impeding the utility’s opportunity to earn a fair return. *Id.*

The Commission has since adopted annual power and/or gas supply adjustment mechanisms for Rocky Mountain Power (PacifiCorp), Avista, and Intermountain Gas based on the same combination of predictability and cost volatility. Intermountain Gas’ Purchased Gas Adjustment (PGA) was adopted, in part, because the Commission recognized that natural gas wholesale prices fluctuate frequently. *See* Order No. 22058. Natural gas wholesale prices make up 71.4% of the Company’s total annual expenses. *See* Case No. INT-G-16-02.

Intermountain has not shown that the projects and expenses it proposes to recover through the IIMM will be unpredictable or volatile. Rather, the expenses appear to be fairly predictable and stable. One of the major costs the Company has identified for recovery through the IIMM is Aldyl-A pipe replacement. The Company has provided the miles of pipe that will need to be replaced by timeframe and vintage and is able to provide an average cost per foot (based on 2015 and 2016 historical costs) so that a total cost per year can be estimated. From its recent experience replacing Aldyl-A pipe, the Company can predict the cost for replacing the pipe with reasonable accuracy. *See* Intermountain Gas Company’s Response to the First Production Request of Commission Staff Nos. 5, 17, and 24 (attached hereto as Attachment A). There may be small variations associated with inflation of pipe and labor costs, but this variation is not large enough to justify a cost recovery mechanism.

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<sup>2</sup> Case No. IPC-E-92-25

<sup>3</sup> Case Nos. IPC-E-88-22 and IPC-E-92-10

### *Removing the Disincentive for Energy Efficiency*

Another reason for implementing an annual adjustment mechanism is that the Company's financial position is harmed by pursuing cost-effective energy efficiency. Because large scale, Company-sponsored energy efficiency can reduce the volumetric sales needed to recover the fixed costs of providing service, the Commission adopted the Fixed Cost Adjustment (FCA) for Idaho Power and Avista to ensure that acquiring cost-effective energy efficiency does not financially harm those utilities.

The FCA is only used to recover costs that were established in a rate case (the fixed cost per customer). It provides a true-up of the actual collection of fixed costs per customer compared to what was assumed in base rates. *See* Order No. 33527 at 2. It is not used for infrastructure replacement and upgrades costs.

Intermountain has launched a small residential energy efficiency program, but it is not yet impacting sales in any meaningful way. The IIMM proposed by the Company is an annual adjustment mechanism that would recover costs that are not evaluated in a rate case and that are unrelated to energy efficiency.

### *Ability to Plan and Manage the Expenses*

Staff also considered whether the type of costs proposed for recovery in the IIMM can be managed through its planning process. Staff reviewed the projects and types of expenses the Company plans to implement in the next five years and believes the Company has a significant amount of control over the timing of these expenses. Staff believes the IIMM is unnecessary because most of these expenses are project costs which the Company can manage through its planning process.

One example of an expense that the Company cannot plan and control is the price of natural gas. This lack of control is one reason justifying the Company's PGA. *See* Order No. 22058 (acknowledging that natural gas prices change frequently). Conversely, the costs proposed for recovery in the IIMM can be planned and managed by the Company throughout the course of the project. Within the next five years, the Company plans to replace Aldyl-A pipe and to remove High-Pressure Service Sets (HPSS) as part of their infrastructure replacement program. The Company can decide when to incur project expenses and cost of the projects through their budgeting and infrastructure integrity processes. This gives the Company a

significant amount of flexibility to adjust its project plans and to incur costs as its budget for each year allows.

A predictable capital expense which the Company can manage over time is ideal for recovery through traditional ratemaking in a general rate case. Rates established in general rate cases have a long history of successfully providing utilities adequate recovery of these types of infrastructure costs.

### *Urgency of Infrastructure Replacement*

The Company claims that the IIMM is needed to fund critical safety and reliability concerns on its system including Aldyl-A pipe and HPSS replacement. It also claims that 42 states have implemented some form of integrity and infrastructure program. While this may be true, Staff's research found that the most urgent infrastructure projects nationwide are replacement of cast iron and unprotected steel pipes, rather than replacement of Aldyl-A pipes.

A 2017 U.S. Department of Energy (DOE) report on natural gas infrastructure at local distribution companies states "While the vast majority of the LDC system is plastic and coated steel pipe, the cast iron and unprotected steel pipe are generally older, more prone to leaks, and are the primary focus of pipe replacement programs aiming to improve the safety and reliability of local distribution systems."<sup>4</sup> The plastic of Aldyl-A pipes tends to be flexible and less susceptible to rupture unless disturbed. However, cast iron and unprotected steel pipes are much more likely to crack and present a safety hazard.

In response to Staff discovery, the Company confirmed that there is no cast iron or unprotected steel pipe in its system. *See* Intermountain Gas Company's Response to the First Production Request of Commission Staff No. 31 (attached hereto as Attachment B). This response is consistent with the DOE report which shows that there is limited to no cast iron or unprotected steel pipe in Idaho.<sup>5</sup> In addition, Staff notes that Intermountain has some of the lowest lost and unaccounted for natural gas rates in the nation. Staff agrees that the Aldyl-A pipe should be replaced, but the low leak rates and resistance to rupture make it a much less urgent safety issue than replacing cast iron or unprotected steel pipe.

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<sup>4</sup> U.S. Department of Energy, 2017, "Natural Gas Infrastructure Modernization Program at Local Distribution Companies: Key Issues and Considerations" at 9.

<sup>5</sup> U.S. Department of Energy at 23.

Staff believes that natural gas utilities with significant amounts of cast iron pipe, unprotected steel pipe, or natural gas leaks could warrant an infrastructure cost recovery mechanism. However, the absence of those circumstances for Intermountain eliminates the primary need of an annual adjustment mechanism. Staff believes the IIMM is unnecessary here and that the Company is well positioned to request infrastructure recovery in regular rate cases.

#### *Company's Financial Position*

If the Company did not have other means to finance infrastructure improvements, a mechanism like the proposed IIMM might be necessary to maintain the financial viability of the Company. The Company did not show that it does not have the ability to finance these projects. The Company has three sources of funding for capital projects. The first is internally generated funds, such as depreciation or net income. The second source is from investors. Generally a company would sell shares of stock to receive those funds, but since the Company is a wholly owned subsidiary, the Company would instead request additional funds from its parent company. The third source is by issuing debt. Staff believes the Company has the resources available to fund the infrastructure replacements projects it is proposing in this case and will be able to request recovery of these costs in general rate cases.

#### **Review of Prudence of Replacement Costs**

In its Application, the Company proposed meeting with the Commission's Pipeline Safety Staff to determine which projects would be considered for recovery in the IIMM:

The Company proposes that at regular intervals during the year, the Company and the Pipeline Safety Division convene an "IIMM Project Review Meeting" to review and agree upon IIMM projects and O&M expenses that would qualify for consideration and recovery in the IIMM. The Company will present IIMM projects and O&M expenses identified by its [Transmission Integrity Management Program (TIMP) and Distribution Integrity Management Program (DIMP)] as well as other IIMM projects and [Operations and Maintenance (O&M)] expenses identified as a result of federal, state or local regulations. The Pipeline Safety Division may also present for discussion and analysis any IIMM projects and O&M expenses that result from its analysis of the Company's distribution system.

*Id* at 7. The Commission's Pipeline Safety Division conducts TIMP and DIMP audits and inspects field-installed equipment on all intrastate natural gas pipeline operators under the Commission's jurisdiction. Staff understands that the Pipeline Safety Staff

reviews the Company's Transmission Integrity Management Plan (TIMP) and Distribution Integrity Management Plan (DIMP) and can require modifications or additions to the plans, to be in compliance with Pipeline and Hazardous Materials Safety Administration (PHMSA) rules and regulations.

As part of the Company's responsibility to support its requests for cost recovery, Staff expects that the Company will provide all information responsive to discovery requests issued to it, rather than refer to (but not provide) information previously provided to Pipeline Safety Staff. Meetings between the Company and Pipeline Safety Staff are not the appropriate method or forum for determining if and at what value projects would qualify for cost recovery.

In a general rate case, the Company's request for cost recovery would appropriately be evaluated by Commission Staff, other intervenors, the Company's customers, and ultimately, the Commission.

### **Proposed Tariff**

Staff reviewed the proposed Rate Schedule IIMM submitted as Exhibit No. 1 of the Company's Application. Staff is concerned that the proposed rate schedule is too technical for most customers to understand. If the Commission approves the Company's Application, Staff recommends the Commission order the Company to work with Staff to revise the proposed schedule to create a concise customer-facing document that clearly describes the purpose and calculation of the IIMM charge.

### **Customer Notice and Comments**

The Company's press release and customer notice were included with its Application. Staff reviewed the documents and determined that both meet the requirements of Rule 125 of the Commission's Rules of Procedure (IDAPA 31.01.01). The notice was included with customer bills. The Company began mailing the customer notices on December 20, 2017, with the last notices mailed to customers on January 23, 2018. As of May 2, 2018, the Commission has received four comments from members of the public, who were all opposed to the Company's proposed IIMM.



## STAFF RECOMMENDATIONS

Staff does not believe that the IIMM is justified in this case because the Company has not shown that the costs are unique in a way that requires them to be addressed outside of traditional ratemaking in a general rate case. These costs are not volatile, unpredictable, related to the acquisition of energy efficiency, outside of the Company's ability to manage, or urgent enough to warrant an annual adjustment mechanism. Furthermore, the Company has the financial strength and access to capital to fund infrastructure improvements between rate cases. Therefore, Staff recommends that the Commission deny the Company's request for an IIMM.

Respectfully submitted this *2<sup>nd</sup>* day of May 2018.



Sean Costello  
Deputy Attorney General

Technical Staff: Joseph Terry  
Kevin Keyt  
Michael Eldred

i:umisc/comments/intg17.7sckskjtdeme comments

**REQUEST NO. 5:** Please provide back-up documentation for the Company's estimation that it would cost "... approximately \$158.4 million to replace all of this Aldyl-A pipe." Application, p. 5.

**RESPONSE TO REQUEST NO. 5:**

*The \$158.4 million cost was derived using the actual average cost of \$50 per foot of pre-1984 Aldyl A pipe replaced in 2015 and 2016 multiplied by the estimated 600 miles of remaining pipe in the system at that time. The current number of miles of pre-1984 Aldyl A pipe scheduled for*

replacement is now 580 miles based on pipe replaced thru 2017. The tables below show the derivation of the average \$50 per foot cost of replaced Aldyl A pipe in 2015 and 2016.

2015			
<u>District</u>	<u>Footage Installed</u>	<u>Actual Cost</u>	<u>Average Cost Per Foot</u>
Capital	12,542	\$666,567	\$53.15
Owyhee	3,644	\$227,536	\$62.44
Skyline	3,090	\$266,783	\$86.34
Teton	7,150	\$197,604	\$27.64
Sawtooth	3,046	\$140,436	\$46.11
	29,472	\$1,498,926	\$50.86

2016			
<u>District</u>	<u>Footage Installed</u>	<u>Actual Cost</u>	<u>Average Cost Per Foot</u>
Capital	14,309	\$747,927	\$52.27
Owyhee	5,466	\$326,338	\$59.70
Skyline	3,910	\$308,381	\$78.87
Teton	13,371	\$516,425	\$38.62
Sawtooth	7,034	\$279,088	\$39.68
	44,090	\$2,178,159	\$49.40

Record Holder: Mike McGrath 208-377-6000  
 Location: 555 S Cole Rd, Boise, ID 83707  
 Sponsor/Preparer: Craig Chapin 208-377-6142

**REQUEST NO. 17:** Please describe in terms of material, number of miles, size, and age each type of pipe in the Company's system that will require replacement within the next five years. Include why it needs replacing, when it needs to be replaced, and at what cost.

**RESPONSE TO REQUEST NO. 17:**

*Pre-1984 Aldyl A pipe is the only pipe required to be replaced in the next five years due to a potential susceptibility to brittle-like cracking. Additional information on the pre-1984 vintage Aldyl A pipe recommended for replacement can be found in the 728-page white paper by the American Gas Association titled "Information About Aldyl A Piping," as described in the response to Request No. 26. Aldyl A pipe is a medium density polyethylene material ranging in pipe size from ½" to 4". Approximately 580 miles of pre-1984 Aldyl A pipe remain in the distribution system*

*and it is fiscally and operationally impractical to replace all 580 miles in five years. The age of Aldyl A pipe ranges from approximately 24-50 years. Installations began in 1968 and started to phase out in 1994. The approximate replacement cost per foot is estimated at \$50, as described in the response to Request No. 5. Intermountain is proposing a 10-15 year timeframe for replacement of pre-1984 Aldyl A pipe, as explained in the response to Request No. 24 below.*

Record Holder: Mike McGrath 208-377-6000  
Location: 555 S Cole Rd, Boise, ID 83707  
Sponsor/Preparer: Craig Chapin 208-377-6142



**REQUEST NO. 24:** Application at 5 – The Company states that it would like to accelerate the replacement of Aldyl-A pipe.

- (a) Please describe the Company's desired "accelerated" schedule for replacement of Aldyl-A pipe including timing, costs, and benefits.
- (b) Please provide the Company's procedures/rules/regulations for handling of Aldyl-A pipe.

**RESPONSE TO REQUEST NO. 24:**

*(a) Based on the Company's TIMP and DIMP risk models, the Company's Aldyl A replacement program is currently projected to span 100 years, with 5-7 miles of pipe replaced per year.*

*The desired replacement schedule of the Aldyl A pipe is 10-15 years at a cost of \$10-\$15 million per year, based on the currently estimated \$50 per foot, as described in the response to Request No. 5.*

*Benefits include:*

- 1. Reduced risk associated with potential hazardous leaks,*
- 2. Reduced risk of potential major incidents resulting in bodily injury, loss of life, and property damage, and*
- 3. Improved long-term reliability of service.*

*(b) Intermountain's DIMP program is the primary federal regulation that drives the way the Company handles Aldyl A. Additionally, there are other advisories, industry studies and recommended practices outlined in the AGA report titled "Information About Aldyl A Piping," which is provided in the response to Request No. 26.*

*Regarding the physical handling of Aldyl A, Intermountain handles it the same as other plastic pipe in the system. There are a few special considerations when field employees encounter Aldyl A. Early vintage Aldyl A service punch tees (SPT) are susceptible to leaking. When service tee connections are exposed during maintenance activity, the section of main where the SPT is located is replaced or in some cases, an over-cap repair kit is installed on the SPT. The following procedure is required on all plastic pipe, however; the requirement was implemented to avoid cracking of Aldyl A pipe. "Any pinch off location on plastic pipe shall be marked with either a black permanent marker or black electrical tape at the squeezed portion of the pipe to prevent additional pinch offs in that location."*

Record Holder: Mike McGrath 208-377-6000  
Location: 555 S Cole Rd, Boise, ID 83707  
Sponsor/Preparer: Craig Chapin & Lance Elroy 208-377-6142 & 208-377-6122

**REQUEST NO. 31:** Please describe all bare steel and cast iron pipe in the Company's system including size, total length, and age.

**RESPONSE TO REQUEST NO. 31:**

*There are no bare steel or cast iron pipes in the Company's distribution system.*

Record Holder: Mike McGrath 208-377-6000  
Location: 555 S Cole Rd, Boise, ID 83707  
Sponsor/Preparer: Craig Chapin 208-377-6142

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 2<sup>ND</sup> DAY OF MAY 2018, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. INT-G-17-07, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY

CERTIFICATE OF SERVICE