STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DE 14-031

LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. d/b/a
LIBERTY UTILITIES

Petition for Approval of Default Service Solicitation, Bid Evaluation and Resulting Rates for the Six-Month Period November 1, 2014 through April 30, 2015

Order Approving Solicitation and Resulting Default Service Rates

O R D E R N O. 25,719

September 29, 2014

APPEARANCES: Sarah B. Knowlton, Esq., on behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities; the Office of Consumer Advocate by Susan W. Chamberlin, Esq., on behalf of residential ratepayers; and Suzanne G. Amidon, Esq., on behalf of Commission Staff.

In this Order, the Commission finds that Liberty's most recent market solicitation for default service power for its Large and Small Customer Group for the Period beginning November 1, 2014 was conducted in accordance with Commission Orders. So finding, the Commission authorizes Liberty to recover the costs of the power supply through rates effective with service rendered on and after November 1, 2014. Liberty's customers will experience bill increases of 39%-59% depending on customer class and usage. The Order recognizes that power supply costs in the competitive market are high for the winter period and that these rates constitute significant increases for customers. The Commission encourages customers to evaluate all measures to reduce electricity consumption and to consider whether competitive suppliers may offer a cost effective alternative to default service.

I. PROCEDURAL HISTORY

On September 22, 2014, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (Liberty or Company) filed a petition requesting approval of its solicitation and procurement of default service for 100% of its supply requirements for the period from November 1, 2014, through April 30, 2015, for its medium and large commercial and industrial customers (Large Customer Group)[1] and residential and small commercial customers (Small Customer Group).[2] The filing was made pursuant to a Settlement Agreement approved by the Commission in *Granite State Electric Company Petition for Approval of Post-Transition Default Service Proposal*, Order No. 25,577 (January 13, 2006), *as modified by* Order No. 24,922 (December 19, 2008) and Order No. 25,601 (November 27, 2013) (Settlement Agreement).

Pursuant to the Settlement Agreement, beginning in February 2014, Liberty solicits default service supply for 100% of its Large Customer Group requirements in two separate three-month blocks of power supply, and develops rates based on the winning bid contract prices. The resulting rates are monthly prices that can vary from month to month. For its Small Customer Group, Liberty solicits a six-month block of power for 100% of supply requirements, and sets a fixed rate for the period.

In support of its petition, Liberty filed the testimony of John D. Warshaw and David B. Simek with related exhibits and attachments. Mr. Warshaw is employed as Manager, Electric Supply, by Liberty Energy Utilities (New Hampshire) Corp. (Liberty Energy N.H.), which

---

[1] The Large Customer Group is comprised of customers taking service under General Long-Hour Service Rate G-2 or General Service Time-of-Use Rate G-1 of the Company's Retail Delivery Tariff.

[2] The Small Customer Group is comprised of customers taking service under Domestic Service Rate D, Domestic Service-Optional Peak Load Pricing Rate D-10, Outdoor Lighting Service Rate M, Limited Total Electrical Living Rate T, General Service Rate G-3, or Limited Commercial Space Heating Rate V of the Company's Retail Delivery Tariff.

provides services to Liberty. Mr. Simek is employed as a Utility Analyst by Liberty Energy N.H. With its filing, Liberty also proposed an adjustment to the Renewable Portfolio Standard (RPS) adder used to procure renewable energy credits for compliance with New Hampshire's RPS law. Liberty's filing included its quarterly report on customer migration to competitive energy suppliers, and its final report regarding loss factor issues related to borderline sales to Massachusetts Electric Company (MECo), including a settlement agreement with MECo related to payments owed to Liberty.

Liberty selected NextEra Energy Power Marketing LLC (NextEra) to provide default service for the Large Customer Group for the three-month period November 2014 through January 2015, and the three-month period from February 2015 through April 2015. The Company selected Energy America LLC (EA) to provide default service to the Small Customer Group for the November 2014 through April 2015 six-month period. As a result of the bid solicitation and selection process, the overall bill impact for residential customers using 665 kilowatt hours (kWh) per month (the average usage for Liberty's residential customers for the 12-month period ending August 2014) is an increase of $51.57 or 46.7% from $110.48 per month to $162.05 per month. For other customers in the Small Customer Group, monthly bill impacts will be increases ranging from 38.9% to 53.4%. Liberty prepared illustrative load-weighted bill impacts for customers in the Large Customer Group. Liberty said that impacts for customers in the Large Customer Group for the six-month period ending April 2015 will be monthly bill increases ranging from 45.6% to 59.1% as compared with the six-month period ending October 2014.

With its petition, Liberty filed confidential information including the Company's transaction confirmations and master power agreements with the winning suppliers, bid evaluation and summary information, RPS compliance pricing, and retail meter commodity cost calculations. Liberty requested confidential treatment of these materials pursuant to N.H. Code Admin. Rules Puc 201.04(a)(5), Puc 201.06(a), and Puc 201.07. With respect to the wholesale purchase prices included in the filing, the Company requested confidential treatment only until such time as the Federal Energy Regulatory Commission (FERC) requires those prices to be made public.

Liberty also submitted its final report on the loss factor investigation, including the status of the settlement with MECo regarding the borderline sales issue. Liberty said that the Company received all payments from MECo under its settlement with Liberty totaling $848,890. Liberty testified that it would credit customers with $723,890 in its next reconciliation filing which represents the transmission and commodity costs Liberty incurred to serve MECo's customers. The remaining $125,000 will be retained by Liberty as distribution revenue that Liberty should have received from MECO.[3] Liberty stated that this represents the final report, and that the corrective action it had previously identified to the Commission had been taken. Liberty requested that the Commission close the investigation into the loss factor study. Liberty said that the only remaining issue regarding the boundary with MECo involved one residential customer who owned a home physically located in New Hampshire but whose electric service was delivered by MECo. Liberty agreed to keep the Commission informed of any developments regarding the resolution of this issue.

---

[3] The Commission approved this allocation as part of the settlement agreement in Docket No. DE 13-063, Liberty's most recent distribution rate case.

The Office of Consumer Advocate (OCA) previously filed a letter of participation in this docket on February 19, 2014. The Commission issued a secretarial letter on September 22, 2014, scheduling a hearing on September 24, 2014. The Commission granted the Company's request for confidential treatment at hearing. The Commission also took administrative notice of certain decisions of the Maine Public Utilities Commission (Maine PUC) in Maine Docket 2006-513; Liberty, Staff and the OCA filed comments on those decisions on September 25, 2014.

II. POSITIONS OF THE PARTIES

A. Liberty

Liberty testified that it conducted the solicitation process consistent with the terms of the Settlement Agreement. The Company issued the request for proposals (RFP) on August 15, 2014. The RFP solicited fixed pricing for each month of service on an as-delivered basis and allowed prices to vary by month. The Company claimed the RFP was also conducted in a manner consistent with RSA 378:41 and conformed to least cost planning principles by procuring power through a competitive process. According to Liberty, the RFP was issued to approximately 25 potential suppliers. The RFP was also distributed to all members of the New England Power Pool Markets Committee and posted on Liberty's energy supply website. In addition, the Company distributed the RFP widely in the New England energy supply marketplace.

Pursuant to the requirements of the RFP, suppliers offered indicative bids on September 9, 2014, and final bids on September 16, 2014. Liberty testified that it evaluated the bids and selected NextEra and EA because their bids conformed to the RFP, had the lowest prices, met the credit requirements described in the RFP, and passed Liberty's qualitative evaluation. Liberty attested that it complied with the Settlement Agreement in its solicitation and evaluation of bids and in its selection of winning suppliers.

On September 16, 2014, Liberty entered into a wholesale transaction confirmation with NextEra for the two three-month blocks of power supply for the Large Customer Group, and with EA for the six-month power supply for the Small Customer Group. According to the Company, a copy of the NextEra master power agreement was filed with the Commission on September 17, 2007 in DE 07-012 (Granite State's 2007 default service docket). The master power agreement between Liberty and EA is included in the confidential material in the instant filing.

Liberty stated that the RPS law requires the Company to obtain 9.7% of its retail energy load with renewable energy in 2014, and 15.8% of its retail energy load with renewable energy in 2015. Liberty meets RPS compliance obligations by purchasing Renewable Energy Certificates (RECs), one certificate representing 1 megawatt-hour of power. Pursuant to Commission Order No. 24,953 (March 23, 2009), Liberty requested bidders for default service supply to also provide a separate RPS compliance adder with their bids. The RPS compliance adder is the incremental charge to be paid to the bidder for the bidder's agreement to take on the RPS obligation associated with the default service obligation. While two of the bidders for default service also submitted a bid for the RPS adder, Liberty said that the Company evaluated the bidders' responses and determined that the proposed adders exceeded Liberty's calculation of the market price for RECs. Therefore, Liberty did not accept any of the proposals offered by bidders for default service supply and will instead procure RECs on its own.

In the instant filing, Liberty proposes to change the current uniform RPS adder of 0.434 cents per kWh based on its analysis of current market prices for RECs, the results of its recent RFP, and the increase in RPS obligations for 2015. For the Small Customer Group, the RPS adder would increase from 0.434 cents per kWh to 0.535 cents per kWh for the six-month period beginning November 1, 2014. For the Large Customer Group, the Company proposes an RPS adder of 0.398 cents per kWh for November and December 2014, a decrease from the current adder of 0.434 cents per kWh, and an adder of 0.595 cents per kWh for the months of January through April 2015. Liberty stated that it plans to issue another RFP for RECs in February 2015, and that if it is unable to secure a sufficient number of RECs to meet its RPS obligations, the Company will make alternative compliance payments into the renewable energy fund established under the RPS law.

In addition to the RPS adder, Liberty proposes a new Regional Greenhouse Gas Initiative (RGGI) auction excess revenue adjustment factor credit (RGGI credit) of 0.0260 cents per kWh for the period beginning November 1, 2014. The credit represents the final refund of 2013 RGGI auction proceeds to customers. Prior to January 1, 2014, all eligible excess RGGI auction proceeds were rebated to default service customers; that is, customers who had not elected to obtain power from competitive energy suppliers. Beginning with 2014 auction proceeds, excess money is rebated to all customers of distribution utilities. Effective January 1, 2015, the Company will include all 2014 RGGI excess auction revenues plus associated carrying charges through its annual retail rate reconciliation, which is applicable to all customers.

For both the Small Customer Group and Large Customer Group, Liberty calculated the base default service rate by multiplying the commodity cost at the wholesale level ($ per megawatt-hour) by the applicable loss factor and then dividing the results by ten. Liberty's filing states that the base energy service rate for the Small Customer Group for the period beginning November 1, 2014, is 15.057 cents per kWh compared with the current load weighted average of 8.379 cents per kWh, an increase of 79.7%. After adjustments for reconciliation and reclassification[4] and the adder for RPS compliance, adjusted for the RGGI credit, the proposed default service rate for the Small Customer Group for the six-month period beginning November 1, 2014, is 15.487 cents per kWh. For residential customers with monthly usage of 665 kWh, the average monthly usage for the 12-month period ending August 2014, customer bills will increase by $51.57 or 46.7% from $110.48 to $162.05 per month. For other customers in the Small Customer Group, monthly bills will increase from 38.9% to 53.4%.

The load-weighted average of the commodity cost at retail for the Large Customer Group is provided below and identified as the "base energy service rate." The calculation of energy service rates for both the Large and Small Customer Groups, adjusted for the reconciliation and reclassification, the RPS adder, and the RGGI credit, are depicted in the table below.

[4] Commission Order No. 24,577 (Jan. 13, 2006) approved the Settlement Agreement which authorized Liberty to use these factors in adjusting rates to reflect actual costs of providing default service.

	Residential and Small C&I	Medium & Large C&I					
	November 2014 - April 2015	November	December	January	February	March	April
Base Energy Service Rate	15.057 ¢	8.182 ¢	17.231 ¢	21.432 ¢	20.703 ¢	12.265 ¢	7.174 ¢
2014 Energy Service Adjustment Factor	(0.123) ¢	(0.123) ¢	(0.123) ¢	(0.123) ¢	(0.123) ¢	(0.123) ¢	(0.123) ¢
Energy Service Cost Reclassification Adjustment Factor	0.044 ¢	0.022 ¢	0.022 ¢	0.022 ¢	0.022 ¢	0.022 ¢	0.022 ¢
Renewable Portfolio Standard ("RPS") Adder	0.535 ¢	0.398 ¢	0.398 ¢	0.595 ¢	0.595 ¢	0.595 ¢	0.595 ¢
RGGI Auction Excess Revenue Adjustment Factor	(0.026) ¢	(0.026) ¢	(0.026) ¢	(0.026) ¢	(0.026) ¢	(0.026) ¢	(0.026) ¢
Total Energy Service Rate	15.487 ¢	8.453 ¢	17.502 ¢	21.900 ¢	21.171 ¢	12.733 ¢	7.642 ¢

Liberty attributed the increase in rates to the fact that the New England generation mix has become dominated by natural gas fired electric generation. Due to the colder than normal temperatures experienced in the 2013-2014 winter, there was a significant increase in the demand for natural gas to meet customers' needs by gas distribution companies and for electric generation. As a result, there was a shortage of natural gas for electric generation and the costs for electric generation reflected the use of alternative, more expensive resources to meet the need. The current high prices for electric futures and resulting bid prices reflect the industry's expectations regarding the cost of natural gas and other resources to meet this winter's expected requirements and are higher as compared to this time last year. The Company also testified that the FERC has approved the winter reliability program administered by the Independent System

Operator-New England (ISO-NE). According to the Company, the winter reliability program adds costs for power procured during the months of December 2014 and January and February 2015, which are reflected in the resulting rates.

The Company said that it recognizes the hardship these rates impose on customers. It plans to issue a press release, update the Liberty web page and Facebook page with the proposed rates, and include a newsletter in customer bills in November that alerts customers to the increase, explains steps that customers can take to conserve electric usage, and identifies resources available to those customers who may face difficulties paying their bills.

In response to an OCA proposal to require a new round of competitive bidding for a one- to two-year period of supply, Liberty testified that based on experience, a new RFP would result in substantially higher prices. Liberty also expressed concern that wholesale suppliers of power would hesitate to offer bids because the supply would incorporate too much risk. Liberty noted that residential customers are free to switch to competitive supply to obtain a fixed price energy supply contract for a longer period, which may be at a lower price. Regarding the OCA's proposal to "spread out" the recovery of costs over a longer period, the Company stated that customers could pay lower rates over the winter period and then leave Liberty for competitive supply, leaving any remaining costs deferred from the winter period to be recovered through higher-than-market rates from customers who did not migrate to competitive suppliers. Liberty stated that such a result would unfairly burden customers who chose to stay with Liberty for energy service. Liberty attested that the RFP resulted in a sufficient number of bids to support the conclusion that the power costs result from a competitive bid process and that the resulting rates are consistent with the market price for power and requested that the Commission reject the

OCA's proposal and approve its filing by September 29, 2014, for effect with rates for services rendered on and after November 1, 2014.

In its written submission regarding the Maine PUC decisions referenced by the OCA and noticed by the Commission, Liberty stated that those decisions could be distinguished from the instant docket and had no bearing on the options available for the Company to procure default service for its customers.

B. OCA

The OCA expressed concern about the effect of the rate increase for residential customers which, for customers with average usage, would total approximately $300.00 for the six-month period. The OCA stated that it was not convinced that, in the event the Commission directed Liberty to issue a new RFP for power, the resulting rates would necessarily be higher, especially if the RFP solicited power for a longer period of time. The OCA recommended that the Commission reject the Company's filing and require Liberty to do one of three things to reduce rate shock for customers: renegotiate power supply costs with the winning suppliers; issue a new RFP to see if new bids would result in lower costs, or issue the RFP for a 1-year or 2-year period of supply instead of a 6-month period; or spread out the recovery of costs over a longer period of time.

In its written submission regarding the Maine PUC decisions, the OCA repeated its assertion that ordering Liberty to issue new RFPs would not necessarily result in higher prices. The OCA also reiterated that the time-period for the power supply period to be covered by the RFP could be extended to 12 or 24 months.

C. Commission Staff

Staff said that Liberty solicited power, evaluated bids, and selected a supplier consistent with the Settlement Agreement approved by the Commission. Regarding the resulting rates, Staff said that although the rates are high, they are a result of a competitive procurement and are market-based. Staff reminded the Commission that customers can take advantage of offers from the competitive market to obtain the best service and rates for their needs.

Addressing the OCA proposal, Staff stated that there is no evidence that a second solicitation would produce lower rates and that the rates developed through competitive bidding, though high, were entirely consistent with its own market analyses. Staff said it supported the Company's increased RPS adder and its application of the 2013 RGGI auction proceeds to reduce customer rates. In addition, Staff said it supported the discontinuance of the requirement that Liberty file a loss factor report, but requested that the Company keep Staff informed of any changes in the situation regarding the residential customer who resides in New Hampshire but receives service from MECo.

III. COMMISSION ANALYSIS

Based on the record in this proceeding, we find that Liberty complied with the procedures approved in Order No. 24,577 regarding its solicitation and analysis of the bids, and its selection of the winning bidders for default service supply for its Small and Large Customer Groups for the six-month period beginning November1, 2014. We are satisfied that Liberty took appropriate steps to solicit multiple potential suppliers in order to receive competitive bid responses and, consequently, that the results are consistent with the requirement of RSA 374-F:3,V(c) that default service be procured through the competitive market. We also find that the Company conducted its energy service RFP in a manner that complies with the least cost planning principles of RSA 378:41.

Although the resulting bids and contract prices are a product of a solid market response to Liberty's RFP and reflect wholesale market conditions, we know that the increases will impose a burden on the budgets of residential and business customers. The OCA attempted to craft a solution to the problem by asking us to reject these bids and direct Liberty to reissue RFPs for power or renegotiate with the winning bidder for price. Neither of these proposals, however, is workable. First, we have no evidence that requiring Liberty to reissue the RFP or renegotiate the price would result in any reduction in customer rates. In fact, the evidence in the record is to the contrary. We note, for example, that Mr. Warshaw reviewed Exhibit 7, which depicts a forecast of power costs as of September 22, 2014, and found that prices in that forecast had gone up even higher than those in the earlier forecast that he used to evaluate the bids. He testified that there were no circumstances he could foresee in the next week or two that would reduce supplier bids. He also testified that bidders consider the risk of a Commission rejecting market-based rates to be very low and that, if we were to reject the results of the instant RFP, few bidders would participate in this market in the future, and those that did would increase their bids to reflect the greater risk. Based on that evidence, we conclude that there is very little likelihood that a rebid or renegotiation of price would result in a reduction of rates for customers.

Second, even if we had evidence to believe a new RFP would lead to lower rates, we are procedurally blocked from requiring a new bid in time for November 1 supply. Liberty obtains power for its default service customers through a process established by the Settlement Agreement approved by the Commission. If we were to change the process set forth in the

Settlement Agreement, RSA 365:28 requires that we do so only after notice and hearing. Because Liberty's next default service period begins November 1, 2014, there is not sufficient time to revisit the requirements of the Settlement Agreement.

The OCA proposal also fails to recognize that Liberty experienced a competitive response to its RFP. When Liberty issued its RFP related to the March filing for default service, Liberty informed the Commission that it was concerned about the relatively low number of bidders in recent solicitations throughout the region and thus developed a contingent plan in the event that no bids were received for the November 1 solicitation. *See* Docket No. DE 14-211. In fact, Liberty's RFP attracted a healthy number of bidders from the competitive market and the contingency never arose.

Finally, after reviewing the Maine PUC decisions and the comments from Liberty, Staff, and the OCA, we find that those decisions are not applicable to the circumstances in the instant docket. The Maine solicitation produced only one bidder unlike Liberty's response. In summary, we find the procedures for competitive bidding were followed, the results though high were in conformance with other market indicators, and there is no evidence that lower prices would result from a new solicitation for the same months or for a longer period. In fact, Liberty testified that prices are likely to be higher if commissions reject bids on the basis of market-based prices. Thus, we do not find it in the public interest to reject this filing and require Liberty to either issue a new RFP or to renegotiate prices. In addition, because the resulting rates are a result of a competitive solicitation and are market-based, we find that the rates are just and reasonable.[5]

---

[5]*See*, e.g.,Louisiana Energy and Power Authority v. FERC, 141 F.3d 36, 329 U.S. App.DC.401 (1998). In that order the U.S. Appellate Court recognized that the Federal Power Act requires that all rates demanded by public utilities

We recognize the reality of high electric prices that result from constrained natural gas supply for both heating and electric generation in New England, and the hardships that this imposes on customers. We encourage customers to take advantage of whatever measures are available to help them reduce their electric usage, obtain lower prices from a competitor, and manage their winter bills. It is important to note that under our competitive model, Liberty merely passes through the best price the competitive market produces, does not earn a profit on the electricity its customers use and has no incentive to retain its default service customers.

Residential customers whose budgets are strained by the higher rates this winter should consider contacting Liberty to see if a budget payment plan is available. We expect that Liberty's call center will be adequately staffed to take such calls and emphasize that Liberty should work closely with the Commission's Consumer Affairs Division to assure that all customer inquiries are appropriately handled by the Company. In addition, customers should take advantage of the information at the Commission's website on managing natural gas and electric service bills during winter months. *See* Managing Your Natural Gas & Electric Utility Bills This Winter .

Residential customers who have not considered taking power from competitive suppliers should review offers from competitive suppliers that are registered to do business in New Hampshire. Customers should be aware that competitive suppliers can offer service under terms that are different from those required of electric utilities and customers should examine carefully the terms and conditions offered to make sure that the service offered matches their needs. Variable rates and termination clauses are two provisions that require particularly close

---

for the sale of electric energy be "just and reasonable" pursuant to 16 U.S.C. 824d(a); and that where there is a competitive market, the FERC may rely on market-based rates in lieu of cost-of-service regulation to satisfy the "just and reasonable" requirement." (citations omitted) examination, because they can significantly increase a customer's bill under certain circumstances. Ratepayers can visit the Commission website at Questions About Choosing a Competitive Supplier for more information about what to consider in selecting a competitive supplier.

Residential ratepayers can also work with Liberty to examine the energy efficiency options available to them to curtail their heating and electric bills. While some energy efficiency measures may require a contribution from ratepayers, many of the measures are eligible for rebates from Liberty. Over time, the savings resulting from such measures often justify the initial financial commitment.

Finally, we note that on September 26, 2014, we received the default service filing for Unitil Energy Service, Inc. (UES), another distribution utility in New Hampshire. UES also solicits power for residential customers from the competitive market, and the rate proposed by UES for residential customers is almost identical to Liberty's. This is further evidence that the increased rates for Liberty's customers are the result of a competitive market and are not an indication of a defective solicitation. The reality is that energy prices will remain high for the winter period, and we urge all ratepayers to evaluate their options to reduce their use and costs while meeting the needs of their families and businesses.

We have reviewed the revised RPS adder and find that it is appropriate to increase the adder in light of the Company's analysis of the market rate for RECs and the increased RPS obligation for 2015. We also approve the revised RGGI credit to complete the return of excess RGGI revenues due Liberty's customers from the 2013 RGGI auctions. Finally, we agree that Liberty can discontinue the period loss factor reports provided that it keeps the Commission informed of the resolution of the issue regarding the one residential customer residing in New Hampshire that is serviced by MECo.

Based upon the foregoing, it is hereby

ORDERED, that the Master Power Transaction Confirmation entered into between NextEra Energy Power Marketing LLC and Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities for default service power supply for the Large Customer Group for the period beginning November 1, 2014 through April 30, 2015 and the resulting default service retail rates are hereby APPROVED; and it is

FURTHER ORDERED, that the Master Power Agreement and Transaction Confirmation entered into between Energy America LLC and Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities for default service power supply for the Small Customer Group for the period beginning November 1, 2014 through April 30, 2015 and the resulting rates are hereby APPROVED; and it is

FURTHER ORDERED, that the RPS adder and the RGGI credit are just and reasonable and that the inclusion of these factors in rates effective November 1, 2014 through April 30, 2015 is hereby APPROVED; and it is

FURTHER ORDERED, that Liberty shall not be required to file any future loss factor reports provided that it keeps the Commission informed of any developments regarding to the New Hampshire residential customer who is served by MECo; and it is

FURTHER ORDERED, that Liberty shall file conforming tariffs within 30 days of the date of this order, consistent with N.H. Code Admin. Rules Puc 1603.02.

By order of the Public Utilities Commission of New Hampshire this twenty-ninth day of September, 2014.

Amy L. Ignatius
Chairman

Robert R. Scott
Commissioner

Martin P. Honigberg
Commissioner

Attested by:

Debra A. Howland
Executive Director