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March 9, 2015

Ms. Carlotta Stauffer, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee FL 32399-0850

Re: Docket No. 150035-EI – Petition for approval of energy purchase agreements between Gulf Power Company and Gulf Coast Solar Center I, LLC, Gulf Coast Solar Center II, LLC, and Gulf Coast Solar Center III, LLC

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's response to Commission Staff's Second Data Request (Nos. 1-24) in the above-referenced docket.

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

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Enclosures

cc: Beggs & Lane  
Jeffrey A. Stone, Esq.  
Office of General Counsel  
Lee Eng Tan  
Division of Engineering  
Robert Graves  
Division of Economics  
William McNulty  
Division of Accounting & Finance  
Bart Fletcher

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15 MAR 10 AM 11:50  
COMMISSION  
CLERK

1. What are the strategic benefits, if any, for Gulf Power Company having renewable energy credits? Please explain your response.

Response:

There are several benefits associated with Gulf Power's ownership of renewable energy credits (RECs) associated with these Energy Purchase Agreements. At least initially, Gulf intends to collect and retire the RECs by providing renewable energy to all of its customers. Gulf's ownership of RECs also has the potential to assist the Company in complying with Renewable Portfolio Standards or similar compliance obligations should they arise in the future. Finally, should the value of RECs increase significantly in the marketplace, Gulf has the flexibility to sell RECs and return the proceeds from such sales to its customers. All of the foregoing benefits of REC ownership are significant in and of themselves. The fact that Gulf is receiving RECs at no cost under the Energy Purchase Agreements further highlights the value of these agreements to Gulf's customers.

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2. What are the strategic benefits, if any, for the Southern Company having renewable energy credits? Please explain your response.

Response:

Given that the renewable energy credits (RECs) generated pursuant to the Energy Purchase Agreements belong exclusively to Gulf Power, the Company is not aware of any benefits that inure to the Southern Company.

3. In its Petition at page 8, Gulf states that it will receive all environmental attributes, including renewable energy credits, carbon offsets, allowances, and any other transferrable environmental interests. Please answer the following:
- a. Define or describe "renewable energy credits." Include in your response an explanation of how the value of "renewable energy credits" is determined, and how these interests are bought and sold.
  - b. Define or describe "carbon offsets." Include in your response an explanation of how the value of "carbon offsets" is determined, and how these interests are bought and sold.
  - c. Define or describe "allowances or any other transferable environmental interest." Include in your response an explanation of how a value is determined, and how these interests are bought and sold.

Response:

- a. The U.S. Federal Trade Commission defines Renewable Energy Credits ("RECs") as commodities representing:

the property rights to the environmental, social, and other nonpower qualities of renewable electricity generation. A REC, and the attributes and benefits it represents, can be "unbundled" from the underlying renewable electricity and sold separately. If the physical electricity and the associated RECs are sold to separate buyers, the electricity is no longer considered renewable ("The REC product is what conveys the attributes and benefits of the renewable electricity, not the electricity itself."). All renewable energy is based on RECs, even when the marketer purchased renewable energy directly from a utility or other provider.<sup>1</sup>

The value of a REC is determined in the open market and is based on supply and demand. In the U.S., there are currently two types of REC markets:

1. "Voluntary" REC markets, in which RECs are ultimately sold to end-users of electricity who do not have a legal obligation to use a certain amount of renewable energy but wish to purchase renewable energy for personal or corporate reasons or goals;
2. REC markets in jurisdictions with laws or regulations requiring utilities to meet a certain portion of their demand with renewable energy. Some

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<sup>1</sup> FTC, The Green Guides, Statement of Basis and Purpose at 201 n. 684, available at: <http://www.ftc.gov/os/fedreg/2012/10/greenguidesstatement.pdf>.



states, for example, have enacted such laws, commonly called "renewable portfolio standards" ("RPS"). Some, though not all, RPS laws allow utilities to purchase RECs to meet the requirements as an alternative to building renewable generation or actually purchasing renewable energy ("renewable energy," as used here, means the bundled product of energy and RECs). RPS laws or regulations may specify characteristics of renewable energy that must be met in order to qualify for RPS compliance. Such characteristics may include: type of renewable energy (solar, wind, biomass, etc.); geographic location of the renewable energy generator (e.g. within the state); and vintage of the renewable energy generator (e.g. commercial operation after some date certain).

In the voluntary REC market, large quantities of RECs are traded through trading platforms that match buyers and sellers at a market clearing price. One such platform is the North American Renewables Registry ("NARR"). RECs can also be sold directly to end-use customers at negotiated rates. Finally, in some states without legal requirements to meet customer demand with a certain amount of renewable energy, voluntary RECs are available to customers who wish to "green" their energy usage.

In jurisdictions with an RPS that allows for the trading of RECs to satisfy the laws' requirements, trading platforms are often established, either through or with the oversight of state agencies, to buy and sell RECs for compliance purposes. In some regions of the country where multiple states have RPS laws that allow for out-of-state REC trading, multi-state exchanges have been established that allow for interstate trading of RECs for compliance purposes. The value of such RECs is established by the "market" and demand is driven by the utilities' need to meet the RPS requirements. In addition, in certain states that have such an RPS, the state establishes an "alternative compliance payment," which is usually an amount of money (per megawatt-hour) that a utility can pay to comply with the RPS in lieu of procuring a REC. As a practical matter, an alternate compliance payment established by a state sets a price ceiling on the value of RECs that are otherwise purchased to satisfy the RPS requirement.

- b. A carbon offset is a reduction in emissions of carbon dioxide or greenhouse gases made in order to compensate for or to offset an emission made elsewhere. One carbon offset generally represents the reduction of one metric ton of carbon dioxide or its equivalent in other greenhouse gases.

There are two markets for carbon offsets. In the larger, compliance market, companies, governments, or other entities buy carbon offsets in order to comply with caps on the total amount of carbon dioxide they are allowed to emit. This market exists in order to achieve compliance with, for example, obligations of

Annex 1 Parties under the Kyoto Protocol, and of liable entities under the EU Emission Trading Scheme. In the much smaller, voluntary market, individuals, companies, or governments purchase carbon offsets to mitigate their own greenhouse gas emissions from transportation, electricity use, and other sources. For example, an individual might purchase carbon offsets to compensate for the greenhouse gas emissions caused by personal air travel.

Importantly, and with respect to the response to Item No. 3a above, a REC in the voluntary market and in most (if not all) state markets, must include **all** environmental attributes from the associated energy, meaning if a renewable generation resource produces carbon offsets, such offsets would be included as a part of the REC.

- c. The phrase "allowances or any other transferable environmental interest" is meant as a catch-all term to supplement the definition of "RECs" (discussed in response to Item 3a above). As discussed above, certain jurisdictions have enacted RPSs, but under other legal requirements, only a subset of the environmental attributes constituting the REC are required. An example would be emission allowances which, like carbon offsets, are used by utilities to comply with clean air legal requirements. As with the other commodities discussed in the responses to Item No. 3, emission allowances can be traded for compliance purposes between utilities and the price is generally determined according to supply and demand (with the "demand" being set by the legally-required amount of allowances each company must procure). While emission allowances are captured in the term "allowances or any other transferable environmental interest," such term is intended to also capture future allowances or tradable attributes that emerge due to changing social or legal circumstances. It is a "catch-all" because it is meant to make clear that, if any such attributes arise, for example, due to the imposition of a new environmental standard, then Gulf Power would have the right to any such attributes that the facility is capable of generating. While emission allowances are commonly traded between utilities in a manner similar to RECs and carbon offsets, it is not possible to say how allowances or other attributes created by a future legal regime would be defined or how their value would be determined, though it is not unreasonable to assume that a regime similar to that described in response to Item Nos. 3a and 3b would emerge.



4. In its Petition at page 9, Gulf asserts that if it sells renewable attributes, the proceeds from such sales would be credited to the Company's retail customers in the form of credits to the Fuel Clause. Identify the specific A and E schedule(s) where such adjustments would be recorded.

Response:

At this early stage, Gulf has not made a final determination of where the proceeds from REC sales would be reflected in the A and E schedules. As noted in response to Item No. 1, at least initially, Gulf intends to collect and retire RECs rather than sell them. However, in the event that RECs from these facilities are sold, one approach which would appropriately credit the proceeds to Gulf's retail customers would be to include the proceeds in the "Adjustment to Fuel Cost" line item on schedules A-1, A-1a, A-2, E-1b, E-1B-1, and E-2.

5. Please explain why Gulf did not include the value of renewable energy credits in its economic evaluations.

Response:

The renewable energy credits (RECs) are bundled with the energy purchased and are being acquired at no cost. Moreover, current market values for RECs are low. Therefore, Gulf did not believe it was necessary to assign a value to the RECs for purposes of its economic evaluations. It is certainly possible that the RECs will increase in value (either for compliance or sales purposes) in the future. However, as mentioned in paragraph 19 of Gulf's petition, Gulf's economic evaluations are conservative and omitting REC values from those evaluations is consistent with Gulf's conservative approach.



6. How will Gulf report and record the purchased power from these solar projects for fuel cost recovery? Please explain how this will be reported on the A and E schedules including A1, A2, A3, A7, A8, A9 and corresponding E schedules.

Response:

Energy purchased under these solar contracts will be reported on Schedule A-9 in line 8 "Purchased Power Agreement Energy" and on Schedule E-9 in "Other Purchases".

7. Will any of the costs of this purchased power and associated costs from these projects be recovered through any cost recovery clauses besides the fuel clause? Please explain your response.

Response:

At this time, Gulf does not anticipate that any such costs will be recovered through any mechanism other than the fuel clause. The fuel clause has been the traditional mode of recovery for expenditures under energy-only purchase power agreements.

8. Will any of the costs of this purchased power and associated costs from these projects be recovered through base rates? Please explain your response.

Response:

Please see Gulf Power's response to Item No. 7.



9. How will Gulf project the cost to be recovered in the fuel clause? Please explain your response, and state all assumptions and inputs.

RESPONSE:

The Energy Purchase Agreements provide a methodology for calculating an "Annual Energy Contract Amount" representing the anticipated energy output of the facilities for a given year (Appendix F) and a Contract Energy Price in \$/MWh (Appendix A, Table A) for every year of the agreements. For any given year, Gulf would determine the applicable pricing for the forthcoming year (which could be less than the Contract Energy Price depending on how much energy the facilities actually delivered during the previous year, See Appendix A, Table B) and multiply the pricing for that year by the Annual Energy Contract Amount to reach an annual cost projection.

10. For each of these solar projects, how has Gulf assessed the financial creditworthiness of the counterparty?

RESPONSE:

Neither Gulf's counterparties nor their parent entity are publicly traded or rated by credit rating agencies. Therefore, it is difficult to assess the financial credit worthiness of those entities. Instead, Gulf insisted on including robust performance security requirements in the Energy Purchase Agreements. These performance security requirements are intended to make Gulf and its customers whole in the event of non-performance and/or breach by one or more counterparties.

11. In Gulf's response to staff data request No. 39, the Company states the following: The energy budget provides a unique avoided cost for each hour of a calendar year which is used to determine the annual solar weighted avoided cost. The annual solar weighted avoided cost is simply the annual average avoided cost during daylight hours.
- Please identify the hours that are considered "daylight hours."
  - Please complete the table below summarizing the annual solar weighted avoided cost over the life of the proposed agreements. Please provide this information assuming Gulf's 2014 budget and 2015 budget.

| Year | Annual Average<br>Avoided Cost<br>(\$/MWH) |
|------|--|
| 2016 |  |
| 2017 |  |
| 2018 |  |
| 2019 |  |
| 2020 |  |
| 2021 |  |
| 2022 |  |
| 2023 |  |
| 2024 |  |
| 2025 |  |
| 2026 |  |
| 2027 |  |
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| 2029 |  |
| 2030 |  |
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| 2032 |  |
| 2033 |  |
| 2034 |  |
| 2035 |  |
| 2036 |  |
| 2037 |  |
| 2038 |  |
| 2039 |  |
| 2040 |  |
| 2041 |  |

RESPONSE:

- Daylight hours are any hours in which solar irradiance is expected to occur. The production forecast model referenced in Gulf's response to Staff's First Data Request Item No. 2, uses hourly resource data that includes the solar radiation and meteorological conditions at the system location to determine production in each hour. Typically the model shows production for the hour sunrise occurs and until the hour the sun sets.
- Confidential electronic attachments are located on the DVD labeled Docket No. 150035-EI Staff's Second Data Request (Nos. 1-24) Disk 1. Please see Excel file named DR2-11 Annual Average Avoided Costs\_CONF.xlsx.



12. Please complete the table below assuming the proposed agreements are not approved.

| Energy Generation by Fuel Type (%) |             |     |      |           |       |
|------------------------------------|-------------|-----|------|-----------|-------|
|                                    | Natural Gas | Oil | Coal | Renewable | Other |
| 2013                               |             |     |      |           |       |
| 2014                               |             |     |      |           |       |
| 2015                               |             |     |      |           |       |
| 2016                               |             |     |      |           |       |
| 2017                               |             |     |      |           |       |
| 2018                               |             |     |      |           |       |
| 2019                               |             |     |      |           |       |
| 2020                               |             |     |      |           |       |

RESPONSE:

| Energy Generation by Fuel Type (%) |             |       |        |           |       |
|------------------------------------|-------------|-------|--------|-----------|-------|
|                                    | Natural Gas | Oil   | Coal   | Renewable | Other |
| 2013                               | 59.99%      | 0.00% | 38.04% | 0.44%     | 1.53% |
| 2014                               | 51.90%      | 0.01% | 46.76% | 0.41%     | 0.92% |
| 2015                               | 64.68%      | 0.00% | 33.36% | 0.24%     | 1.72% |
| 2016                               | 64.43%      | 0.00% | 33.58% | 0.27%     | 1.72% |
| 2017                               | 60.46%      | 0.00% | 37.70% | 0.24%     | 1.60% |
| 2018                               | 57.62%      | 0.00% | 40.52% | 0.24%     | 1.62% |
| 2019                               | 54.71%      | 0.00% | 43.41% | 0.24%     | 1.64% |
| 2020                               | 50.57%      | 0.00% | 47.58% | 0.23%     | 1.62% |

13. Please complete the table below assuming approval of all three agreements.

| Net Present Value Savings (\$millions, 2015 \$)  |             |             |
|--|-------------|-------------|
| Annual Delivery Percentage for Every Year of the Contract Life for Each Solar Facility | 2014 Budget | 2015 Budget |
| 110%   |             |             |
| 90%  |             |             |
| 85%  |             |             |
| 75%  |             |             |

RESPONSE:

| Net Present Value Savings (\$millions, 2015 \$)  |             |             |
|--|-------------|-------------|
| Annual Delivery Percentage for Every Year of the Contract Life for Each Solar Facility | 2014 Budget | 2015 Budget |
| 110%   | 19.1        | 3.1         |
| 100%   | 17.4        | 2.8         |
| 90%  | 15.6        | 2.5         |
| 85%  | 31.6        | 19.2        |
| 75%  | 42.7        | 31.8        |

1. A row indicating Net Present Value for 100% delivery percentage was added to the response for reference purposes.
2. At the 85% and 75% levels, the price Gulf will pay per MWh will decline per the contract terms which has the effect of improving the NPV.

14. Please complete the table below assuming approval of all three agreements. Please include savings associated with the sale of RECs.

| Net Present Value Savings (\$millions, 2015 \$) |             |
|---|-------------|
| 2014 Budget                                     | 2015 Budget |
|   |             |

RESPONSE:

| Net Present Value Savings (\$millions, 2015 \$) |             |
|---|-------------|
| 2014 Budget                                     | 2015 Budget |
| 19.4  | 4.8         |

1. These values include the NPV of both the contract energy and the RECs.
2. REC assumptions are consistent with Gulf's response to Staff's First Data Request Item No. 16
3. As stated in response to Item No. 1, at least initially, Gulf intends to collect and retire the RECs rather than sell them.



15. Please refer to Gulf's response to Staff's First Data Request, Item No. 27. Please provide the range of natural gas and coal price scenario forecasts developed for the 2014 and 2015 SES planning process and, for each such forecast, the related views of market drivers, environmental regulations, and other factors used to develop the forecasts.

RESPONSE:

The Company's confidential range of 2014 and 2015 natural gas and coal price scenario forecasts are shown in electronic attachments located on the enclosed DVD labeled Docket No. 150035-EI Staff's Second Data Request (Nos 1-24) Disk 1. Please see Excel file named "DR2-15 2014-2015 Fuel Price Forecasts\_CONF.xlsx."

This range of forecasts reflects different views of supply and demand drivers. These include different views of shale gas production volumes, shale gas production costs (including costs addressing environmental concerns related to natural gas production), exports of LNG, US economic growth and growth in electricity demand.

16. Refer to Gulf's response to Staff's First Set of Data Requests, Item No. 27 and Staff's Second Set of Data Requests, Item No. 15. Please complete the table below assuming approval of all three agreements, but exclusive of REC sales.

| Net Present Value of Savings (\$ millions, 2015 \$) |             |             |
|---|-------------|-------------|
| Fuel Forecast Scenario                              | 2014 Budget | 2015 Budget |
| Low (per DR 2 <sup>nd</sup> Set, Item 15)           |             |             |
| Base  |             |             |
| High (per DR 2 <sup>nd</sup> Set, Item 15)          |             |             |

RESPONSE:

| Net Present Value of Savings (\$ millions, 2015 \$) |             |             |
|---|-------------|-------------|
| Fuel Forecast Scenario                              | 2014 Budget | 2015 Budget |
| Low (per DR 2 <sup>nd</sup> Set, Item 15)           | (17.3)      | (24.1)      |
| Base  | 17.4        | 2.8         |
| High (per DR 2 <sup>nd</sup> Set, Item 15)          | 63.7        | 58.4        |

17. Refer to Gulf's response to Staff's First Data Request, Item No. 27.
- a. Do the possible outcomes of each of factor which produces the range of forecasts have equal likelihood? Please explain, and quantify any differences in the likelihood of the outcomes of each factor to the extent such differences exist.
  - b. In consideration of 17a above, please explain why each of the scenario forecasts produced using Gulf's process has an equal likelihood.
  - c. Are the likelihood estimates of Gulf's factors used to produce the forecasts and the likelihood of the forecasts provided in part or in whole by Charles Rivers and Associates? Please explain.

RESPONSE:

The Company designs its scenario forecasts to span a plausible range of outcomes. Through its scenario analysis, the Company attempts to construct a set of long-term forecasts that reflect the range of plausible outcomes based on a plausible range of views of key input assumptions in several areas. Such areas include long-term shale gas availability, long-term shale gas production cost (including addressing future environmental concerns), long-term LNG exports and long-term US GDP growth. The Company works with its modeling consultant, Charles River Associates (CRA), to identify these values based on current data and analytical thinking. The Company believes that future fuel price uncertainty is helpfully reflected in the range of prices identified by its forecasting process. Neither the Company nor CRA ascribes probability values to the individual factors which produce the range of forecasts or to the forecasts themselves. The Company does not believe doing so would add useful information.

18. Refer to Gulf's response to Staff's First Data Request, Item Nos. 11 and 23. In Gulf's cost analysis for the solar projects, why is the avoided fuel coal?

RESPONSE:

In responding to Staff's First Data request Item No. 11, Gulf made some simplifying assumptions based on Gulf's specific operation as it is operating now and as viewed in the near future. Upon further examination, the energy modeled for this project analysis displaces a combination of coal and gas based on system fuel cost projections and operation. Please see Gulf's revised responses to Staff's 1<sup>st</sup> Data Request No. 11 and correspondingly Item No. 12 and No. 13. Gulf's response to Item No. 23 used coal and gas as the avoided fuel in modeling the costs initially.



19. Refer to Gulf's response to Staff's First Data Request, Item No. 23.e. In its response, why did Gulf not include an alternative coal price forecast (commodity) sourced from third party forecasting entities, not specifically prepared by SES or CRA, to compare to the Company's 2014 and 2015 coal price forecasts as a test for reasonableness?

RESPONSE:

Alternative coal price forecasts from third party forecasting entities were included in Gulf's original response to Staff's First Data Request Item No. 23e. For convenience, they have been provided here again. The Company believes that its moderate natural gas and coal forecast are within the range of these alternative third-party fuel price forecasts.

Confidential electronic attachments are located on the DVD labeled Docket No. 150035-EI Staff's Second Data Request (Nos. 1-24) Disk 1. Please see Excel file named DR1-23e.Alternative Fuel Price forecasts-CONF.xlsx. Specifically see worksheets named "2014 Coal Forecasts Reviewed" and "2015 Coal Forecasts Reviewed."

Public electronic attachments are located on the enclosed DVD labeled Docket No. 150035-EI Staff's Second Data Request (Nos. 1-24) Disk 2. Please see Excel file named DR1-23e.Alternative Fuel Price forecasts-public.xlsx". Specifically, see worksheets named "2014 Coal Forecasts Reviewed" and "2015 Coal Forecasts Reviewed."

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20. Refer to Gulf's response to Staff's First Data Request, Item No. 23.a. Please provide the Company's 2014 fuel price forecast (system wide and in nominal \$/Mmbtu) for the years 2014-2043, shown as commodity, transportation, and delivered fuel prices.

RESPONSE:

The Company's 2014 fuel price forecasts for years 2014-2043 are shown in confidential electronic attachments located on the DVD labeled Docket No. 150035-EI Staff's Second Data Request (Nos. 1-24) Disk 1. Please see Excel file named DR2-20 2014 Fuel Price Forecast Nominal\_CONF.xlsx.

Forecasts include commodity, transportation, and delivered coal prices to the Company's Plant Crist and natural gas commodity (at Henry Hub), transportation, and delivered prices to Plant Smith.

21. Refer to Gulf's Petition, Paragraph 19, Page 10. Why did coal and natural gas prices used in the 2015 energy budget decrease relative to coal and natural gas prices in the 2014 energy budget?

RESPONSE:

Forecast commodity prices of natural gas in 2015 were generally lower than in 2014 largely because views of drivers of natural gas supply and exports became more favorable due to low-cost natural gas availability. Forecast commodity prices of coal in 2015 were generally lower than in 2014 largely because natural gas prices were down which caused demand for coal to decline which suppressed coal prices.

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22. Refer to Gulf's response to Staff's First Data Request, Item Nos. 23.c-d. Please provide the interpretation of the information provided. For example, what does column 1 stand for, and what is the unit of the numbers presented in range b2:k50?

RESPONSE:

The data provided represents the resulting hourly avoided costs (\$/MWH) from the 2014 and 2015 Energy Budgets. Each vintage is based on a moderate fuel price forecast.



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23. Refer to Gulf's response to Staff's First Data Request, Item No. 23.e. Please provide the same information but show all price in nominal \$/MMBtu.

RESPONSE:

The alternative price scenario forecasts are shown in attachments labeled "DR2-23 Alternative Fuel Price Forecasts Nominal Conf" and "DR2-23 Alternative Fuel Price Forecasts Nominal Public.xlsx."

Confidential electronic attachments are located on the DVD labeled Docket No. 150035-EI Staff's Second Data Request (Nos. 1-24) Disk 1. Please see Excel file named DR2-23 Alternative Fuel Price forecasts Nominal Conf.xlsx.

Non-confidential electronic attachments are located on the enclosed DVD labeled Docket No. 150035-EI Staff's Second Data Request (Nos. 1-24) Disk 2. Please see Excel file named DR2-23 Alternative Fuel Price forecasts Nominal Public.xlsx".

24. Did Gulf include CO2 costs in its analysis of the proposed agreements?
- a. If no, please explain why not.
  - b. If yes, please explain the basis for the CO2 costs assumed.
  - c. If yes, please complete the table below summarizing the Net Present Value savings of the proposed agreements assuming no CO2 costs. For the purposes of this question please assume approval of all three agreements.

| Net Present Value Savings (\$millions, 2015 \$)<br>w/o CO2 Costs |             |
|--|-------------|
| 2014 Budget  | 2015 Budget |
|  |             |

RESPONSE:

- a. No. At the present time there are no rules or regulations governing Gulf's CO2 emissions. It is certainly possible that the energy purchase agreements could provide future value in terms of CO2 compliance. However, as mentioned in paragraph 19 of Gulf's petition, Gulf's economic evaluations are conservative and omitting CO2 values from those evaluations is consistent with Gulf's conservative approach.
- b. N/A
- c. N/A

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Petition for approval of energy purchase** )  
**agreements between Gulf Power Company** )  
**and Gulf Coast Solar Center I, LLC,** )  
**Gulf Coast Solar Center II, LLC, and** )  
**Gulf Coast Solar Center III, LLC** )

Docket No.: **150035-EI**

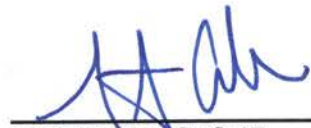
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 9th day of March, 2015 to the following:

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