

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 20210015-EI

Petition for rate increase
by Florida Power & Light
Company.

_____ /

PROCEEDINGS: HEARING

COMMISSIONERS
PARTICIPATING: CHAIRMAN GARY F. CLARK
COMMISSIONER ART GRAHAM
COMMISSIONER ANDREW GILES FAY
COMMISSIONER MIKE LA ROSA
COMMISSIONER GABRIELLA PASSIDOMO

DATE: Wednesday, August 18, 2021

TIME: Commenced: 9:30 a.m.
Concluded: 9:50 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: DEBRA R. KRICK
Court Reporter

PREMIER REPORTING
112 W. 5TH AVENUE
TALLAHASSEE, FLORIDA
(850) 894-0828

1 APPEARANCES:

2 WADE LITCHFIELD, JOHN BURNETT, MARIA MONCADA
3 ESQUIRES, Florida Power & Light Company, 700 Universe
4 Boulevard, Juno Beach, Florida 33408; KENNETH A.
5 HOFFMAN, ESQUIRE, 134 W. Jefferson Street, Tallahassee,
6 Florida 32301; RUSSELL A. BADDERS, ESQUIRE, Gulf Power
7 Company, One Energy Place, Bin 100, Pensacola, Florida,
8 32520, appearing on behalf of Florida Power & Light
9 Company (FPL).

10 BRADLEY MARSHALL and JORDAN LUEBKEMANN,
11 ESQUIRES, Earthjustice, 111 S. Martin Luther King Jr.
12 Boulevard, Tallahassee, Florida 32301; CHRISTINA I.
13 REICHERT, ESQUIRE, Earthjustice, 4500 Biscayne
14 Boulevard, Suite 201, Miami, Florida 33137, appearing on
15 behalf of Florida Rising, Inc., League of Latin American
16 Citizens of Florida, and Environmental Confederation of
17 Southwest Florida(LULAC, ECOSWF).

18 THOMAS JERNIGAN, MAJOR HOLLY BUCHANAN, CAPTAIN
19 ROBERT FRIEDMAN, SERGEANT ARNOLD BRAXTON, EBONY PAYTON
20 and SCOTT KIRK, Federal Executive Agencies, 139 Barnes
21 Drive, Suite 1, Tyndall AFB, Florida 32403; appearing on
22 behalf of the Federal Executive Agencies (FEA).

23

24

25

1 APPEARANCES CONTINUED:

2 JON C. MOYLE, JR. and KAREN A. PUTNAL,
3 ESQUIRES, Moyle Law Firm, 118 North Gadsden Street,
4 Tallahassee, FL 32301; appearing on behalf of Florida
5 Industrial Users Group (FIPUG).

6 FLOYD R. SELF, ESQUIRE, Berger Singerman, LLP,
7 313 North Monroe Street, Suite 301, Tallahassee, Florida
8 32301; T. SCOTT THOMPSON, ESQUIRE, Mintz, Levin, Cohn,
9 Ferris, Glovsky and Popeo, P.C., 555 12th Street NW,
10 Suite 1100, Washington, DC 20004, appearing on behalf of
11 Florida Internet & Television, Inc. (FIT).

12 JAMES W. BREW and LAURA W. BAKER, Stone Law
13 Firm, 1025 Thomas Jefferson Street NW, Suite 800 West
14 Washington, DC 20007; appearing on behalf of Florida
15 Retail Federation (FRF).

16 WILLIAM C. GARNER, ESQUIRE, Law Office of
17 William C. Garner, 3425 Bannerman Road Unit 105, #414,
18 Tallahassee, Florida 32312, appearing on behalf of The
19 CLEO Institute, Inc. (CLEO).

20 ROBERT SCHEFFEL WRIGHT and JOHN T. LAVIA, III,
21 ESQUIRES, Gardner, Bist, Bowden, Dee, LaVia, Wright,
22 Perry & Harper, P.A., 1300 Thomaswood Drive,
23 Tallahassee, Florida 32308, appearing on behalf of
24 Floridians Against Increased Rates, Inc. (FAIR).

25

1 APPEARANCES CONTINUED:

2 GEORGE CAVROS, ESQUIRE, 120 E. Oakland Park
3 Boulevard, Suite 105, Fort Lauderdale, Florida 33334;
4 appearing on behalf of Southern Alliance for Clean
5 Energy (SACE).

6 KATIE CHILES OTTENWELLER, ESQUIRE, 838 Barton
7 Woods Road, Atlanta, Georgia 30307, appearing on behalf
8 of Vote Solar (VOTE SOLAR).

9 NATHAN A. SKOP, ESQUIRE, 420 NW 50th
10 Boulevard, Gainesville, Florida 32607, appearing on
11 behalf of Daniel R. and Alexandria Larson (Larsons).

12 RICHARD GENTRY, PUBLIC COUNSEL; CHARLES
13 REHWINKEL, DEPUTY PUBLIC COUNSEL; PATRICIA A.
14 CHRISTENSEN and ANASTACIA PIRRELLO, ESQUIRES, OFFICE OF
15 PUBLIC COUNSEL, c/o The Florida Legislature, 111 West
16 Madison Street, Room 812, Tallahassee, Florida
17 32399-1400, appearing on behalf of the Citizens of the
18 State of Florida (OPC).

19 SUZANNE BROWNLESS, BIANCA LHERISSON, SHAW
20 STILLER and JENNIFER CRAWFORD, ESQUIRES, FPSC General
21 Counsel's Office, 2540 Shumard Oak Boulevard,
22 Tallahassee, Florida 32399-0850, appearing on behalf of
23 the Florida Public Service Commission (Staff).

24

25

1 APPEARANCES CONTINUED:

2 KEITH HETRICK, GENERAL COUNSEL; MARY ANNE
3 HELTON, DEPUTY GENERAL COUNSEL, Florida Public Service
4 Commission, 2540 Shumard Oak Boulevard, Tallahassee,
5 Florida 32399-0850, Advisor to the Florida Public
6 Service Commission.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

P R O C E E D I N G S

CHAIRMAN CLARK: Good morning, everyone.
Today's August 18th. I would like to call this
hearing to order.

Staff, if you would, please read the notice.

MS. BROWNLESS: Yes, sir.

By notice issued on July 19th, 2021, as
amended by the Fourth Order Revising OEP, dated
August 12th, 2021, Order No. PSC-2021-0305-FC-OEI,
this time and place has been set for a final
hearing in Docket No. 20210015-EI in the Florida
Power & Light rate case. The purpose of the
hearing is set out more fully in the notice.

CHAIRMAN CLARK: Thank you, Ms. Brownless.

All right. We will begin with appearances now
beginning with FPL and Gulf Power.

MR. LITCHFIELD: Thank you, Mr. Chairman.
Wade Litchfield and Maria Moncada appearing on
behalf of Florida Power & Light Company this
morning.

CHAIRMAN CLARK: Thank you very much.

OPC.

MS. CHRISTENSEN: Good morning. Patty
Christensen with OPC. I would like to put in an
appearance for Richard Gentry, the Public Counsel,

1 Charles Rehwinkel and Anastacia Pirrello.

2 Thank you.

3 CHAIRMAN CLARK: Thank you very much.

4 CLEO.

5 MR. GARNER: Thank you, Mr. Chairman. This is
6 William Garner on behalf of the CLEO Institute.

7 CHAIRMAN CLARK: Thank you.

8 And FAIR.

9 MR. WRIGHT: Good morning. Robert Scheffel
10 Wright appearing on behalf of Floridians Against
11 Increased Rates, Incorporated. I would also like
12 to enter an appearance for law partner, John Thomas
13 LaVia, III.

14 Thank you.

15 CHAIRMAN CLARK: Thank you, sir.

16 FEA. You are on mute, Major.

17 MAJOR KIRK: Good morning, sir. This is Major
18 Scott Kirk of the U.S. Air Force on behalf of the
19 Federal Executive Agencies.

20 CHAIRMAN CLARK: Thank you, sir.

21 FIPUG.

22 MR. MOYLE: Good morning. Jon Moyle on behalf
23 of the Florida Industrial Power Users Group, FIPUG,
24 and Karen Putnal should also be shown as entering
25 an appearance.

1 Thank you.

2 CHAIRMAN CLARK: Thank you, sir.

3 FIT.

4 MR. SELF: Good morning, Mr. Chairman. Floyd
5 Self on behalf of the Florida Internet Television
6 Association. I would also like to enter an
7 appearance for Scott Thompson, who is on the phone.

8 CHAIRMAN CLARK: All right. Thank you, sir.
9 Florida Retail.

10 You have need to hit the unmute, Mr. Brew.
11 Hit it again, Mr. Brew. Still can't hear you.
12 Can't hear you, Mr. Brew.

13 If you would like to enter an appearance for
14 yourself and Laura Baker, give me a thumbs up.
15 There we go. All right. Thank you, sir. We will
16 take that as your appearance while you work on that
17 mute button.

18 Florida Rising.

19 MR. MARSHALL: Bradley Marshall on behalf of
20 Florida Rising, the League of United Latin American
21 Citizens of Florida, better known as LULAC, and the
22 Environmental Federation of Southwest Florida,
23 better known as ECOSWF. I would also like to enter
24 an appearance for Jordan Leubkemann and Christina
25 Reichert.

1 Thank you.

2 CHAIRMAN CLARK: Thank you very much.

3 Daniel and Alexandria Larson.

4 MR. SKOP: Yes. Good morning, Mr. Chairman.

5 Nathan A. Skop entering an appearance on behalf of
6 Daniel and Alexandria Larson. And we would like to
7 thank the prehearing officer for allowing the
8 parties to appear remotely this morning.

9 CHAIRMAN CLARK: Thank you, Mr. Skop.

10 SACE, Mr. Cavros.

11 MR. CAVROS: Good morning, Mr. Chair. George
12 Cavros on behalf of Southern Alliance for Clean
13 Energy.

14 CHAIRMAN CLARK: All right. Thank you very
15 much.

16 Vote Solar.

17 MS. OTTENWELLER: Good morning. Katie Chiles
18 Ottenweller on behalf of Vote Solar.

19 CHAIRMAN CLARK: Walmart.

20 MS. EATON: Good morning, Mr. Chairman.

21 Stephanie Eaton on behalf of Walmart.

22 CHAIRMAN CLARK: All right. Commission Staff.

23 MS. BROWNLESS: Good morning, Mr. Chairman.

24 It's Suzanne Brownless on behalf of the Commission
25 Staff. I would also like to enter an appearance

1 for Shaw Stiller and Bianca Lherisson.

2 MS. HELTON: Mr. Chairman, finally, Mary Anne
3 Helton here as your advisor, along with your
4 General Counsel, Keith Hetrick.

5 CHAIRMAN CLARK: All right. Thank you very
6 much. Did we get everyone? That was a long list.

7 All right. Everybody is accounted for.

8 All right. Let's begin with preliminary
9 matters.

10 Staff, anything we need to address?

11 MS. BROWNLESS: Yes, sir.

12 On August 4th, 2021, FPL filed a motion for
13 summary final order regarding the standing of FAIR.
14 FAIR and Florida Rising have filed responses
15 opposing the motion on August 11th, 2021.

16 FPL is requesting that FAIR be denied party
17 status and that FAIR's prefiled testimony and
18 exhibits be stricken from the record should party
19 status be denied.

20 As FPL acknowledges in its motion granting
21 FAIR provisional associational standing or order
22 granting FAIR provisional association standing
23 indicated that FAIR's standing would be ruled upon
24 at the conclusion of the hearing as part of the
25 resolution of Issue No. 9. Consistent with that

1 order, staff recommends that the Commission wait
2 and make a post-hearing ruling on this motion as
3 part of the resolution of Issue No. 9.

4 CHAIRMAN CLARK: So ordered.

5 MS. BROWNLESS: Thank you.

6 FAIR has, at this time, filed a motion for
7 reconsideration of our order denying
8 confidentiality for its membership list. That's
9 Order No. PSC-2021-0299, issued August 6th. FAIR
10 has filed that a motion for reconsideration before
11 the full Commission, and the parties have until
12 August 23rd to respond to that motion.

13 We would recommend that the motion be dealt
14 with at a later date by the full commission.

15 CHAIRMAN CLARK: Agreed.

16 All right. Let's move to the stipulation and
17 settlement agreement.

18 MS. BROWNLESS: Yes, sir.

19 On August 10th, 2021, FPL, OPC, FIPUG, SACE
20 and FRF filed a joint motion for approval of a
21 settlement agreement. In order to give the parties
22 and the staff sufficient time to review and conduct
23 discovery on the settlement, we would ask that this
24 hearing be continued until Monday, September 20th,
25 and continue on September 21st and 22nd, if needed.

1 We further recommend that the hearing consider
2 both the rate case petition filed by FPL as well as
3 the settlement agreement.

4 Our recommended schedule to consider this is
5 as follows:

6 FPL and the supporters and signatories of the
7 settlement agreement may file testimony limited to
8 the settlement agreement on or before August 26th.

9 Parties opposed to the settlement agreement
10 may file testimony on or before September 13th.

11 Discovery on the settlement agreement will be
12 extended until Friday, September 17th.

13 Data requests limited to the settlement
14 agreement shall be answered within seven days of
15 service.

16 When we get to the hearing, our suggestion is
17 that the hearing be conducted in this manner:

18 That the witnesses associated with the rate
19 case, both direct and rebuttal, be put up -- FPL's
20 witnesses would be put up first, and people would
21 have an opportunity to cross-examine them; and then
22 the intervenor witnesses would be put up second,
23 and people would have an opportunity to
24 cross-examine them should they so desire. When we
25 get through with that, we would move on to the

1 settlement agreement witnesses.

2 At this time, because of the time we have, and
3 in order to have a more efficient hearing, we would
4 like the intervenors who oppose the settlement go
5 next and present their testimony, and then FPL
6 would go at the end and present their support for
7 the settlement agreement and oral rebuttal.

8 And then when we get done with that, we would
9 ask everyone whether they wish to brief or not. If
10 they wish to brief, those briefs would be due
11 Wednesday, October 6th, and be limited to the
12 relevant legal issues identified in the prehearing
13 order, which are Issues 1 through 12.

14 Issues 1 through 6 are the issues that
15 indicate -- that ask whether the Commission has the
16 legal authority to approve certain proposals that
17 are both in the rate case, as well as in the
18 stipulation agreement.

19 And the rest -- the other issues, 7 through
20 12, are standing issues. Is it appropriate to
21 grant associational standing to CLEO and to FAIR.

22 So that's what would be briefed, in addition
23 to a new issue, is the settlement agreement, when
24 taken as a whole, in the best interest of the
25 public?

1 So those are the issues that would be briefed.
2 We would intend to take the vote on the
3 settlement agreement at the October 26th Agenda
4 Conference. And we would suggest that briefs on
5 the settlement agreement be due October 6th.

6 So our idea is that we will get feedback from
7 the parties and a final ruling on these dates, and
8 then a procedural order implementing those dates
9 would be issued.

10 CHAIRMAN CLARK: We are hoping to be able to
11 issue that tomorrow or -- is that right?

12 MS. BROWNLESS: Yes, sir, very shortly.

13 CHAIRMAN CLARK: It will be issued tomorrow,
14 okay.

15 All right. Thank you, Ms. Brownless.

16 I want to say thank you to the staff and to
17 all the parties for the excellent amount of work
18 that you guys have put into getting everything as
19 tightly wound together as possible. So I want to
20 give you all an opportunity to comment, ask any
21 questions that you may have procedurally before we
22 move on.

23 We will begin with FPL.

24 MR. LITCHFIELD: Thank you, Mr. Chairman.

25 FPL is comfortable with the schedule as

1 outlined by -- by Ms. Brownless this morning, but
2 one point of clarification for staff with respect
3 to Issues 1 through 6, which as currently worded
4 relate to the filed case that FPL has made, so I
5 guess I am curious as to whether we are briefing
6 those issues in the context of approval of the
7 settlement.

8 MS. BROWNLESS: Yes, sir. Here's how I would
9 interpret those issues, okay. They are quite broad
10 when you read them. And so to the extent that the
11 settlement agreement includes, for example, an
12 RSAM, the issue would be: Does the Commission have
13 the statutory authority to approve the RSAM in the
14 context of a settlement agreement? And the same
15 would be true for the other legal issues, which I
16 believe are all associated with actions that are
17 implemented in the settlement agreement.

18 MR. LITCHFIELD: So we are briefing those in
19 the context of the settlement agreement?

20 MS. BROWNLESS: Yes.

21 MR. LITCHFIELD: Thank you. Okay.

22 CHAIRMAN CLARK: All right. Thank you very
23 much.

24 MR. WRIGHT: Mr. Chairman.

25 CHAIRMAN CLARK: Yes, sir.

1 MR. WRIGHT: Just another clarifying question
2 to the same point. Would we -- these briefs would
3 be on the legal issues related only to the
4 settlement agreement, so it's using your example --

5 MS. BROWNLESS: It's standing plus settlement
6 agreement.

7 MR. WRIGHT: Yeah. But the legal issues,
8 using the example Ms. Brownless just used of the
9 RSAM issue, the only issue to brief in the brief we
10 are going to file on October 6th is does the
11 Commission have the authority to approve an RSAM in
12 settlement agreement, as opposed to in the
13 settlement agreement or in the general rate case?

14 MS. BROWNLESS: Yes, it's in the settlement.

15 MR. WRIGHT: Got it. Thank you.

16 CHAIRMAN CLARK: All right. Next up, OPC.

17 MS. CHRISTENSEN: I think my colleagues have
18 echoed my concern, which is that the October 6th
19 brief is limited to addressing issues in the
20 context of whether or not the settlement should be
21 approved. Because obviously, if we have to address
22 it from a different perspective, our responses
23 might be different, but we fully, obviously,
24 support the settlement. And with that
25 understanding, we are fine with the procedure as

1 laid out in the issues that staff is proposing to
2 address.

3 CHAIRMAN CLARK: All right. Thank you very
4 much.

5 CLEO.

6 MR. GARNER: CLEO is good with everything at
7 this time, Mr. Chairman.

8 CHAIRMAN CLARK: Thank you.

9 FAIR.

10 MR. WRIGHT: I covered mine, Mr. Chairman.
11 Thank you.

12 CHAIRMAN CLARK: Let me simplify this.

13 Anybody need to address anything?

14 All right. Ms. Ottenweller.

15 MS. OTTENWELLER: Just one point of
16 clarification.

17 Ms. Brownless, you talked about the new issue
18 being is the settlement agreement in the public --
19 in the best interest of the public. Is that the
20 same standard as in the public interest or --

21 MS. BROWNLESS: Yes, ma'am. I will --

22 MS. OTTENWELLER: Okay.

23 MS. BROWNLESS: -- I will tighten up the
24 wording on that.

25 MS. OTTENWELLER: Okay. Thank you. I just

1 wanted to make sure.

2 CHAIRMAN CLARK: Mr. Marshall.

3 MR. MARSHALL: Just one question regarding
4 when we will discovery open up on the settlement.
5 Is it open as of today, or is when the order is
6 issued?

7 And then a second question, or hope, that
8 perhaps getting a few more days on the brief,
9 because that right now, the brief date is two weeks
10 after the end of the hearing, and between when we
11 will get the -- expect we will get the transcript
12 of the hearing. If there is any way we could get a
13 few more days on the brief, that would be much
14 appreciated.

15 CHAIRMAN CLARK: I think we actually discussed
16 this. We may have some flexibility there, is that
17 correct, Ms. Brownless?

18 MS. BROWNLESS: Yes. We would expect to have
19 daily transcripts, so that will help, I hope. And
20 it's possible that we could extend it as far out as
21 the 11th of October.

22 CHAIRMAN CLARK: That would help?

23 MR. MARSHALL: Yes, that would help a lot.

24 Thank you, Mr. Chairman.

25 CHAIRMAN CLARK: We will work on that. Thank

1 you.

2 All right. Anyone else? Anyone on the line
3 that I may have missed that needed to address the
4 Commission?

5 MR. SKOP: Yes, Mr. Chairman. Nathan Skop on
6 behalf of the Larsons.

7 Again, the Larsons would echo the concern
8 raised by Walmart on tightening the language in the
9 new issue, and also we would appreciate the
10 opportunity for the October 11th extension of the
11 briefs.

12 Thank you.

13 CHAIRMAN CLARK: I may have missed it, but I
14 didn't catch Walmart on the issue, did we?

15 Ms. Eaton? You may have meant Vote Solar,
16 okay, Ms. Ottenweller, is that correct, Mr. Skop?
17 All right. We are going to just assume that's what
18 he meant by that. I think that was what he was
19 implying.

20 All right. Anyone else?

21 Ms. Eaton.

22 MS. EATON: Mr. Chairman, this is Stephanie
23 Eaton for Walmart.

24 I did have a question as to the witness
25 presentation. I believe on our witness -- Walmart

1 did not oppose the settlement agreement, and our
2 witness in the prehearing order issued before the
3 settlement agreement was filed had been excused. I
4 just want to confirm that that's still the case as
5 to the --

6 CHAIRMAN CLARK: That's my -- my
7 understanding.

8 Ms. Brownless?

9 MS. BROWNLESS: With regard to Walmart, have
10 your -- my understanding is there had not been a --
11 you had requested that they be excused, but that
12 that had not been ruled upon; is that correct?

13 MS. EATON: Well, I thought that, but then
14 when I saw the prehearing order, when you look at
15 the witnesses, it says excused, so --

16 MS. BROWNLESS: Stipulated to and excused --

17 MS. EATON: -- that's what I'm asking.

18 MS. BROWNLESS: Does it say stipulated to and
19 excused by mutual agreement?

20 MS. EATON: Yes. Correct. That is correct.

21 MS. BROWNLESS: Yes. And that's fine then.
22 We've already ruled on that. That's okay.

23 CHAIRMAN CLARK: Yes, ma'am.

24 MS. EATON: Okay. Thank you.

25 CHAIRMAN CLARK: All right. Any other

1 parties? Any comments or concerns?

2 MS. CHRISTENSEN: Commissioner, are we going
3 to be addressing witnesses -- excuse me, Patty
4 Christensen with OPC.

5 Are we going to be addressing potential
6 stipulations and excusals of witnesses? I think we
7 left some of those issues open from the prehearing.
8 There were offers made by FPL to stipulate
9 intervenor witnesses. And at this time, we are in
10 a posture to accept that stipulation and ask for
11 excusal of our witnesses as well.

12 MS. BROWNLESS: What we are going to do is
13 request that everybody, we are trying to schedule a
14 teleconference for a week from today, which will
15 give everybody an opportunity to evaluate this new
16 procedure; figure out who they want to stipulate to
17 or not stipulate to; give people an opportunity to
18 tell us whom they wish to actually have appear at
19 the hearing so they can do cross-examination for,
20 and both on the part of the Commissioners
21 themselves as well as the parties. So that's what
22 we would anticipate doing, is working those details
23 out prior to the September 20th hearing.

24 MR. LITCHFIELD: Mr. Chair, I assume there is
25 no objection with -- with the parties continuing to

1 have discussions with respect to those stipulations
2 leading up to that offer --

3 MS. BROWNLESS: Yes.

4 MR. LITCHFIELD: -- so that we can report out
5 where we are?

6 CHAIRMAN CLARK: Absolutely.

7 MS. BROWNLESS: Yes, sir.

8 CHAIRMAN CLARK: All right. Anyone else?

9 Commissioners, any comments or questions or
10 concerns?

11 All right. Seeing none, this hearing is
12 continued on September 20th.

13 Reminder, we do begin the 20th at one o'clock
14 p.m. sharp Eastern time.

15 We are adjourned. Have a good day.

16 (Proceedings concluded.)

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF LEON)

I, DEBRA KRICK, Court Reporter, do hereby certify that the foregoing proceeding was heard at the time and place herein stated.

IT IS FURTHER CERTIFIED that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this transcript constitutes a true transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 31st day of August, 2021.



DEBRA R. KRICK
NOTARY PUBLIC
COMMISSION #HH31926
EXPIRES AUGUST 13, 2024