## FILED 6/2/2023 DOCUMENT NO. 03492-2023 FPSC - COMMISSION CLERK

ECENED-FPSC



David M. Lee Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 691-7263 (561) 691-7135 (Facsimile) E-mail: david.lee@fpl.com

June 1, 2023

REDACTED

## -VIA HAND DELIVERY -

Adam Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 20230001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Materials Provided Pursuant to Audit No. 2023-010-4-2. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibits C and D are a justification table and declarations, respectively, in support of FPL's Request.

Please contact me if you or your Staff has any questions regarding this filing. AFD 1 Eft "6" APA ECO ENG GCL IDM Enclosure CLK Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

Florida Power & Light Company

### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery Clause with Generating Performance Incentive Factor

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Docket No: 20230001-EI

Date: June 1, 2023

## FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2023-010-4-2

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 2023-010-4-2 ("the Audit"). In support of this request, FPL states as follows:

1. During the Audit, FPL provided Staff with various confidential documents. By letter dated May 11, 2023 Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential handling of the confidential work papers.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy the confidential documents, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of two copies of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B. c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A by page and line. Exhibit C also references the specific statutory basis for the claim of confidentiality and identifies the declarant who supports the requested classification.

d. Exhibit D is the declarations of Gerard Yupp and Luisa Santacoloma in support of this Request.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As described more fully in the declaration included as Exhibit D, certain documents contain information concerning pricing and other terms, payment records and vendor and supplier rates or other contractual data, the disclosure of which would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of FPL's customers. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Also, certain information in these documents concern FPL's competitive interests as well as the competitive interests of its counterparties and its customers, the disclosure of which would impair the competitive business of FPL and its customers and vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.

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6. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Maria Jose Moncada Managing Attorney David M. Lee Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 Telephone: (561) 691-7263 Facsimile: (561) 691-7135 Email: David.lee@fpl.com

By:

David M. Lee Florida Bar No. 103152

## CERTIFICATE OF SERVICE Docket No. 20230001-EI

**I HEREBY CERTIFY** that a true and correct copy of the foregoing\* has been furnished by electronic mail on this 1<sup>st</sup> day of June 2023 to the following:

Suzanne Brownless Ryan Sandy Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 sbrownle@psc.state.fl.us rsandy@psc.state.fl.us

Dianne M. Triplett 299 First Avenue North St. Petersburg, Florida 33701 dianne.triplett@duke-energy.com

Matthew R. Bernier Stephanie Cuello 106 East College Avenue, Suite 800 Tallahassee, Florida 32301 matthew.bernier@duke-energy.com stephanie.cuello@duke-energy.com Attorneys for Duke Energy Florida

Robert L. Pickels **Duke Energy Florida** 106 East College Avenue, Suite 800 Tallahassee, Florida 32301 robert.pickels@duke-energy.com FLRegulatoryLegal@duke-energy.com

Robert Scheffel Wright John Thomas LaVia, III Gardner, Bist, Bowden, Dee, LaVia, Wright, Perry & Harper, P.A. 1300 Thomaswood Drive Tallahassee, FL32308 schef@gbwlegal.com jlavia@gbwlegal.com Attorneys for Florida Retail Federation Mary Wessling Associate Public Counsel Patricia A. Christensen Associate Public Counsel Charles J. Rehwinkel Deputy Public Counsel **Office of Public Counsel** c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400 wessling.mary@leg.state.fl.us christensen.patty@leg.state.fl.us rehwinkel.charles@leg.state.fl.us

J. Jeffrey Wahlen Malcolm N. Means Virginia Ponder Ausley & McMullen 123 S. Calhoun Street P.O. Box 391 Tallahassee, Florida 32302 vponder@ausley.com jwahlen@ausley.com mmeans@ausley.com Attorneys for Tampa Electric Company

Paula K. Brown **Tampa Electric Company** P.O. Box 111 Tampa, Florida 33601-0111 regdept@tecoenergy.com

Jon C. Moyle, Jr. Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com mqualls@moylelaw.com Attorneys for Florida Industrial Power Users Group Mike Cassel Vice President, Governmental and Regulatory Affairs Florida Public Utilities Company 208 Wildlight Ave. Yulee, Florida 32097 mcassel@fpuc.com

Michelle D. Napier Director, Regulatory Affairs Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 mnapier@fpuc.com

Peter J. Mattheis Michael K. Lavanga Joseph R. Briscar Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007 pjm@smxblaw.com mkl@smxblaw.com jrb@smxblaw.com Attorneys for Nucor Steel Florida, Inc. Beth Keating Gunster Law Firm 215 South Monroe St., Suite 601 Tallahassee, Florida 32301-1804 bkeating@gunster.com Attorneys for Florida Public Utilities Company

James W. Brew Laura Wynn Baker Stone Mattheis Xenopoulos & Brew, P.C. 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007 jbrew@smxblaw.com lwb@smxblaw.com Attorneys for White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs

George Cavros Southern Alliance for Clean Energy 120 E. Oakland Park Boulevard Suite 105 Fort Lauderdale, FL 33334 george@cavros-law.com Attorney for Southern Alliance for Clean Energy

By: David M. Lee

David M. Lee Florida Bar No. 103152

\*Copies of Attachments B and C are available upon request.

**Docket No. 20230001-EI** 

# EXHIBIT "B"

# FPL's MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2023-010-4-2

Fuel Audit Workpaper Number 42-1 [Page 1]

Revenues

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Fuel Audit Workpaper Number 42-1.1 [Page 1]

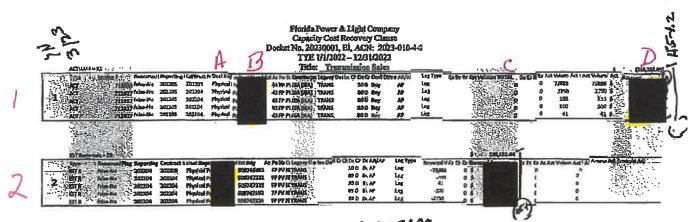
Revenues

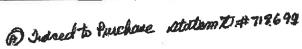
Fuel Audit Workpaper Number 42-1.2 [Page 1]

Revenues

Fuel Audit Workpaper Number 42-1.3 [Page 1]

Revenues

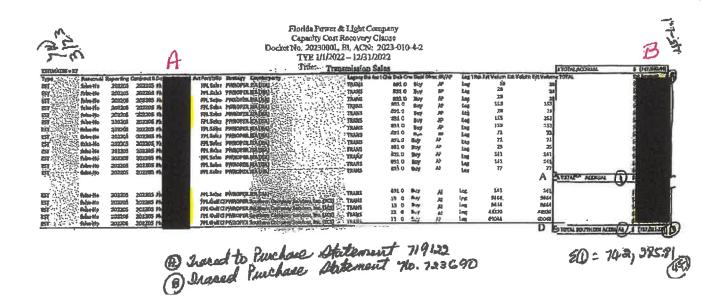




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#### REDACTED Florida Power & Light Company Capacity Cost Recovery Clause Docket No. 20230001, EI, ACN: 2023-010-4-2 TYE 1/1/2022 – 12/31/2022 Title: Purchased Power



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# Florida Power & Light Company

**Billing Statement** 

For Purchased Power From

		For Purchased Pov	ver From	29명 30 <mark>~</mark> 7		
		For Transaction I May 1, 2022 through I		2	R	
QF ID 5417 May 2022	GENERATION 27,647.970 MW	H ENERGY PAYMENT	COST	46.3 Hb.1	AMOUNT	2
		CUSTOMER CHARGE			S. 306 a.Z.	3
		Monthly Capacity Payment		Heil	u s	3.47
	Total Due	Amount Previously Bille	bd			5

Execution Date/Time : 06/17/22 at 09:54:10 Invoice ID: 722740

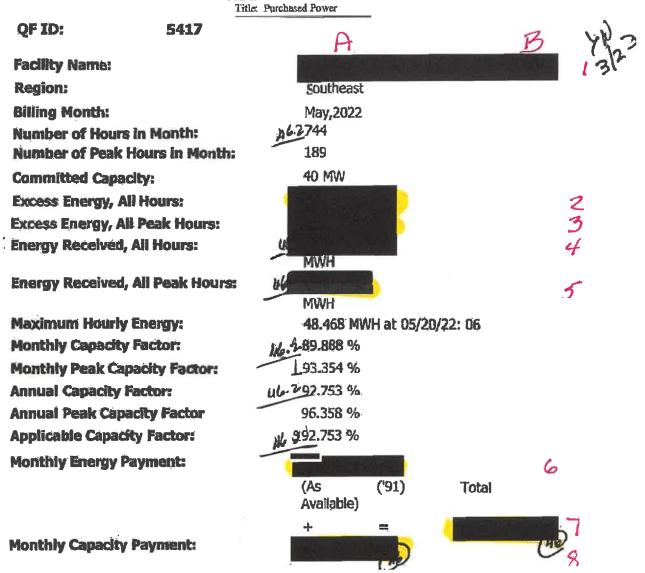
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SOURCE DR.#G

24

## Gualifying Fiction Power & Light Company Capacity Cost Recovery Clause Qualifying Fiction (1997)



PBC

# CONFIDENTIAL

SOURCE DR#6

Execution Date/Time:06/17/22 at 09:54:10 Invoice ID: 722740 46.1

## Florida Power & Light Company Gapacity Cost Recovery Clause Docket No. 20230001, HI, ACN: 2023-010-4-2 TYE 1/1/2022- 12/31/2022 Qualifying Facility Capacity Exercise

Facility Name: Region: South

n,

	All Periods	On Peak Periods							
Year/ Month	# of Hours	Total B	Monthly CP,FAC	Yearly CP.FAC	# oF Hours	Total MWH	Monthly. CP.FAC	Yearly CP.FAC	
2021-06	720		90.883	95,012	198		95.771	99.246 2	
2021-07	744		91.126	94.874	198	<b>19</b> 38 - <b>1</b> 9	94,987	99.019 🏾 🍠	
2021-08	744		93,164	94.481	198	19 A 19 A 19	94.604	98.381 😽	
2021-09	720	3.4.1.18	101.605	95.611	169		107.097	99,597 🍠	
2021-10	744	- N - N	88.156	95.1 <b>6</b> 9	189	and the second	88.761	98,904 💪	
2021-11	721	1.181(50)	92.714	94,937	168		98.914	98,997 🌱	
2021-12	744	anal 18	97.824	95.016	184	The Local Diversion	103,517	99,099 🌮	
2022-01	744		86.638	94.779	168		87.653	98.981 9	
2022-02	672	1	83,129	93.873	160		63.229	97.803 70	
2022-03	743		98.542	93.998	184		101.557	97,954 🚺	
2022-04	720	1 43-11-11	99.363	93.725	189		105.756	97.632 12	
2022-05	4744		89.888	\$7,753	189		94,452	96,358 13	
Total	8,760	378,544,603			2,214	82,485.918	16.1	ule.	

# PBC

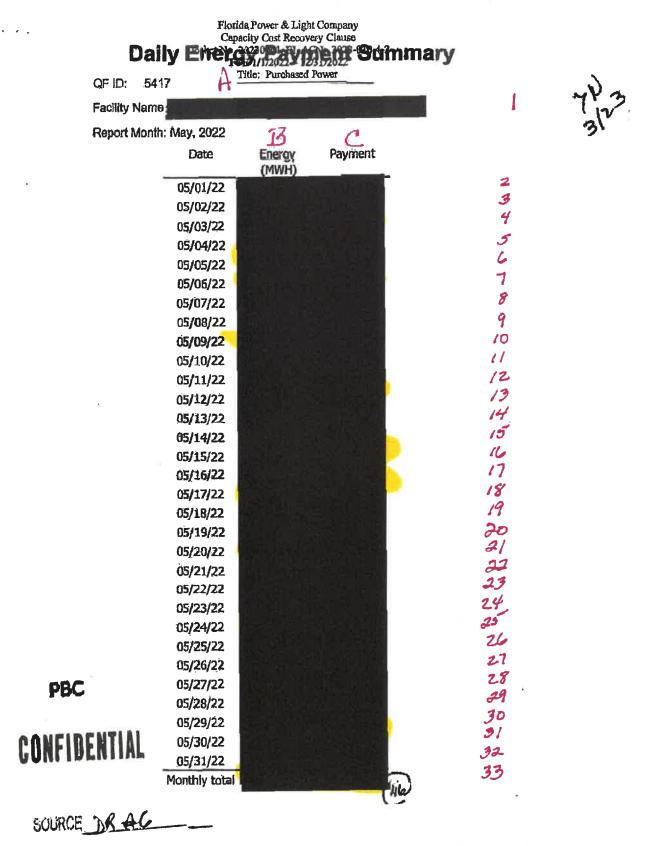
# CONFIDENTIAL

SOURCE DRHG

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Involce ID: 722740

# Florida Power & Light Company Capacity Cost Recovery Clause Docket No. 20230001, EI, ACN: 2023-010-4-2 TYE 1/1/2022 - 12/31/2022 Title: Purchased Power

2	A
Month	May-2022
Year	2022
Month 10	5
Contract Month	month 12
	1
GULF ENERGY PAYMENTS	
Availability Bonus Payment	60
Fired Hour True Up Payment to Shell	
Capacity Payments	
VOM Energy Payment	
Alternate Delivered Energy	\$0.00
Oll-Generated Energy Surcharge Payment	50.00
Power Aug Surcharge Payment	3
Steam Turbine Start Charges	
Fired Hour Payment	34
Adjusted Fired Hour Payment to Shell	
	20 Castron and a super-
Heat Rate Payments to Shell	\$0.00
Provisional Off Peak Availability Refund to Shell	\$0.00
Provisional Peak Availability Refund to Shell	\$0.00
Start Up Energy Payment to Shell	\$0.00
Alabama Power Demand Charge (Overpayment)	
Total Payments to Shell	1
Total Paymentes to Union	THE REAL PROPERTY OF
SHELL ENERGY PAYMENTS	
Fired Hour True Up Payment to Gulf	CONTRACT OF CONTRACT
Heat Rate Payments to Gulf	\$0.00
Provisional Off Peak Availability Payment to Gulf	
Provisional Peak Availability Payment to Gulf	\$0.00
Start Up Energy Payment to Gulf	
Cover Payment	\$0.00
Excess Duct Fired Energy Payment to Gulf	\$0.00
Excess Power Aug Energy Payment to Guif	\$0.00
Withholding Payment	\$0.00
Testing Reimbursement	\$0.00
Financial Settlement	\$0.00
Total Payments to Gulf	\$0.00
Monthly True-Up Data	\$0,00
Involce Total	
	· · · · · · · · · · · · · · · · · · ·
	\$0
Monthly Generátion	422,520
Monthly oblieranon	

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\$

Florida Power & Light Company

Cepacity Cost Recovery Clause Docket No. 20230001, EL, ACN: 2023-010-4-2 TYE 1/1/2022 – 12/31/2022 <u>Title: Purch as of Power</u>

# Florida Power & Light Company

**Billing Statement** 

For Purchased Power From

For Transaction Period:

May 1, 2022 through May 31, 2022

QFID	GENERATION		AMOUNT	£.
5420	2604 MWH ('91, Contract)			2
May 2022	1698.0820 MWH (* 09, AA)			3
	4302.0820 MWH	ENERGY PAYMENT BRS VARIABLE O&M - PER FPSC ORDER DATED JANUARY 1, 2022 BRS	(13) (14)	45
-4		Manihis Capacity Payment	C	6
		CUSTOMER CHARGE		7
		<b>Amount Previously Billed</b>	****	
		Total Due		8

Execution Date/Time : 06/17/22 at 09:56:56

Invoice ID: 222743

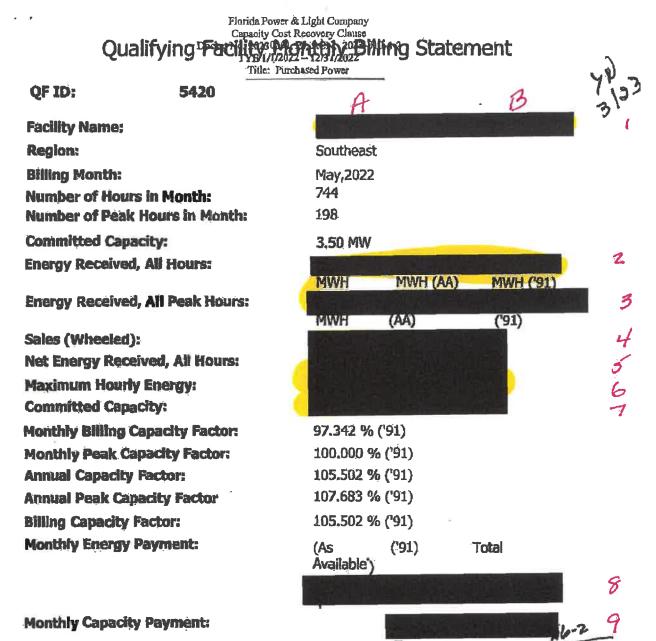
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Execution Date/Time:06/17/22 at 09:56:56 Invoice ID: 722743 16-2.1

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26-9.2

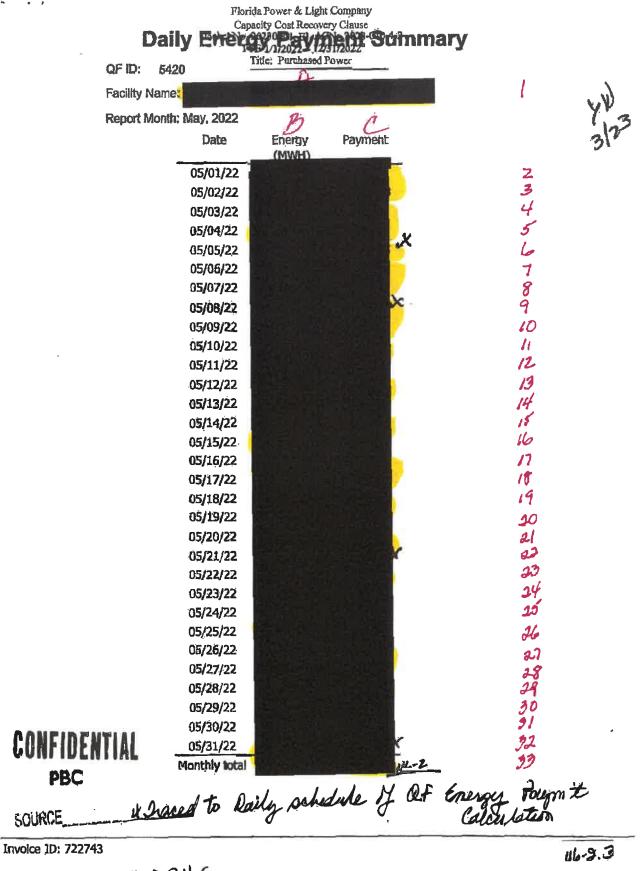
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QF ID: 5420 FACILITY NAME

Hour	Energy (mwh) B	Avolded cost (\$/MWH)	87AS AVALIBLE ENERGY (MWH)	91 Energy (MWH)	As Availble87 Payment(\$)	91 Payment (\$) E	Peyment(\$)	Note	
1	0		20,802	3.500					
2			20.291	3,500					
3			20.723	3.500	n i ten soan Sin af so		1. 1. 1.		
4		日本主	20.464	3,600	P.o.B.				
5	i khui	ne ist a	21.098	3.500			មិន ភ្នំដែ		
6			21.278	3,500	SA HE				
7		1.14	21.422	3,500			Same		
6			19.730	3.500			de la		Ďo
θ 🦷			19,809	3.500					
10			19.010	3.500			Sec. 1		Floatdy Power & Light Company Capacity Cost Recovery Clause Docket No. 20230001, EI, ACN: 2023-010-4-2 INE 1/1/2022 - 12/31/2022
13			0.000	3.500	0.00				oddy Power & Light Compa apacity Cost Recovery Claus a. 20230001, EI, ACN: 2022 TVE 1/1/2022 - 12/31/2022 DF
12		i di mang	0.000	3.500	0.00				
13			0.000	3.500	0,00			ÓN	ight ACI 12/3
14			0.000	3,500	0.00		1.1.411	ON	
15 🙀			0.000	3.500	0.00			ON	NGB 22 21
16			0.000	<b>3</b> .500	0.00		新学校	ON I	0-4-2
17			0.000	3.500	0.00			ON	
18			0.000	3.500	.0.00			ON	1
19			0.000	3,500	0.00			ON	2
20			0.000	3.600	0.00		h는 11	ON	ð
21			0.000	3,500	-0.00		经费运货	ON	3
22			0.000	3.600	0.00				2
23			4.057	3.500	174.81				2
24			0.000	3.500	0.00				2
aily Total			208.684	84.000	And Service		Same		26
onth Total			831.101	168.000			e Sul		27

SOURCE DR #6

Execution Date: 06/17/22 at 09:56:56



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# **Docket No. 20230001-EI**

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# EXHIBIT "C"

# FPL's MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2023-010-4-2

# EXHIBIT C

COMPANY:	Florida Power & Light Company
TITLE:	List of Confidential Workpapers
AUDIT:	FPL, Capacity Audit
AUDIT CONTROL NO:	2023-010-4-2
DOCKET NO:	20230001-EI
DATE:	June 1, 2023

Workpaper No.	Description	No. of Pages	Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
42-1	Revenues	1	Y	ALL	(e)	Luisa Santacoloma
42-1.1	Revenues	1	Y	ALL	(e)	Luisa Santacolom
42-1.2	Revenues	1	Y	ALL	(e)	Luisa Santacoloma
42-1.3	Revenues	1	Y	ALL	(e)	Luisa Santacoloma
44	Incremental Security O&M	1	N			
44.1	Incremental Security O&M	1	N			
44.2	Incremental Security O&M	1	N			
44.3	Incremental Security O&M	1	N			
44.4	Incremental Security O&M	1	N			
45	Transmission Sales	1	N			
45.1	Transmission Sales	1	N			
45.2	Transmission Sales	1	N			
45-1	Transmission Sales	1	N			
45-1.1	Transmission Sales	1	Y	Cols A-B, as marked	(d)(e)	G. Yupp
45-1.2	Transmission Sales	1	Y	Cols A and C, Line 2; Cols B and D, Line 1	(d)(e)	G. Yupp
45-1.3	Transmission Sales	1	N			
46	Purchased Power	1	Y	Col A, Line 1; Col B Lines 2-4	(d)	G. Yupp
46.1	Purchased Power	1	Y	Col A, Lines 1-6 and 8; Col B Lines 1 and 7	(d)	G. Yupp
46.2	Purchased Power	1	Y	Col A, Line 1; Cols B-C, Lines 2-13	(d)	G. Yupp
46.3	Purchased Power	1	Y	Col A, Line 1; Cols B-C, Lines 1-33	(d)	G. Yupp
46-1	Purchased Power	1	Y	Col A, Lines 1-8	(d)	G. Yupp
46-2	Purchased Power	1	Y	Col A, Line 1; Col B, Lines 2-8	(d)	G. Yupp
46-2.1	Purchased Power	1	Y	Cols A-B Lines 1-3 and 8- 9; Col A, Lines 4-7	(d)	G. Yupp
46-2.2	Purchased Power	1	Y	Col A, Line 1; Cols B-C, Lines 2-27; Col D, lines 2- 10; Cols E-F, Lines 2-27	(d)	G. Yupp
46-2.3	Purchased Power	1	Y	Col A, Line 1; Cols B-C, Lines 2-33	(d)	G. Yupp
46-3	Purchased Power	1	N			
46-3.1	Purchased Power	1	Ν			
53-1	NRC Fees	1	N			
53-1.1	NRC Fees	1	N			
53-1.2	NRC Fees	1	N			
53-1.3	NRC Fees	1	N			
53-1.4	NRC Fees	1	N			

Workpaper No.	Description	No. of Pages		Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
53-1.5	NRC Fees	1	N			

# **Docket No. 20230001-EI**

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# EXHIBIT "D"

# FPL's MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2023-010-4-2

#### EXHIBIT D

#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery Clause with Generating Performance Incentive Factor

Docket No. 20230001-EI

#### DECLARATION OF LUISA SANTACOLOMA

1. My name is Luisa Santacoloma. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Billing Solutions Support. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 2023-010-4-2 for which I am designated as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain customer billing information, including pricing and account information. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of least eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

uisa Santacoloma

#### EXHIBIT D

### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery Clause with Generating Performance Incentive Factor Docket No. 20230001-EI

#### **DECLARATION OF GERARD J. YUPP**

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading business unit. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 2023-010-4-2 for which I am designated as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute data such as pricing and other terms, payment records, and vendor and supplier rates. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of least eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

Gerard J. Yupp Date: 5/31/23