Decision 16-08-013 August 18, 2016

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) to Establish Marginal Costs, Allocate Revenues, Design Rates, and Implement Additional Dynamic Pricing Rates.	Application A.14-06-014 (Filed June 20, 2014)

DECISION GRANTING COMPENSATION TO THE AGRICULTURAL ENERGY CONSUMERS ASSOCIATION FOR CONTRIBUTION TO DECISION 16-03-030

Intervenor: Agricultural Energy Consumers Association (AECA).	**For contribution to Decision D.16-03-030**
Claimed: $131,878.25	**Awarded: $132,381.30**
Assigned Commissioner: Michel P. Florio	**Assigned ALJ: Stephen C. Roscow**

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.16-03-030 adopts five separate settlements and resolves contested issues relating to Southern California Edison Company's (SCE) electric marginal costs, revenue allocation, and rate design. (Agricultural Energy Consumers Association (AECA) participated in two of the settlements: the Marginal Cost and Revenue Allocation Settlement Agreement, as amended, and the Agricultural and Pumping Rate Group Rate Design Settlement Agreement.))

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	September 17, 2014	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	October 17, 2014	Verified
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.13-04-012	Verified
6. Date of ALJ ruling:	July 29, 2013	Verified

7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.13-04-012	Verified
10. Date of ALJ ruling:	July 29, 2013	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-03-030	Verified
14. Date of issuance of Final Order or Decision:	March 18, 2016	Verified
15. File date of compensation request:	May 17, 2016	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
9	In multiple decisions over the past two decades (D.95-07-093; D.96-08-040; D.96-11-048; D.02-06-014; D.03-09-067, D.06-04-065, D.13-02-019, D.14-12-069), and most recently in D.15-12-041, the Commission has found that AECA represents individual member farmers who have annual electricity bills of less than $50,000, and that members' economic interest has been considered small in comparison to the costs of participation. For purposes of this proceeding, AECA had 309 active individual members (excluding agricultural associations and water district members) with 211 of those members having electricity bills of less than $50,000. As a result AECA is seeking 68% (211÷309) of the total compensation found reasonable in this proceeding.	

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. AECA litigation position set forth in testimony:		Verified.

a. Revise marginal cost and revenue allocation methodologies. b. Create agricultural hydrological balancing account. c. Agricultural tariffs should be designed to shift load to off-peak. d. Address PA-ICE rate sunset and rate shock. e. Definition of Agricultural Power Service should be modified to include dairy producers. f. AECA Proposed Agricultural Rates	a. Exh. 301, pp. 1-43. b. Exh. 301, pp. 44-48. c. Exh. 301, pp. 48-57. d. Exh. 301, pp. 58-61. e. Exh. 301, pp. 61-64. f. Exh. 301, pp. 65-72. As described in the following sections, AECA was a party to the Settlements approved by the Commission that resolved through negotiation and mutual compromise the marginal cost, revenue allocation, rate design, and agricultural rate issues raised by AECA in testimony. (*See* D.16-03-030, adopting five settlements, including the Marginal Cost and Revenue Allocation Settlement Agreement, as amended, and the Agricultural and Pumping Rate Group Rate Design Settlement Agreement)	
2. AECA was an active party to the Marginal Cost and Revenue Allocation Settlement Agreement and was a panelist at the Aug. 18, 2015 workshop on Marginal Cost and Revenue Allocation. The Settlement Agreement resolved all marginal cost and revenue allocation issues. While it did not address all of	D.16-03-030, pp. 3-6, and Marginal Cost and Revenue Allocation Settlement Agreement, pp.1-2. D.16-03-030, pp. 10-14, and Marginal Cost and Revenue Allocation Settlement Agreement, pp. 7-10 (marginal cost) and pp. 11-16 (revenue allocation).	Verified.

the issues AECA raised in testimony, it covered the saliency of them through the settled rates, and included specific consideration of key issues, such as an agricultural balancing account, and cost of service studies.		
"Thus, the Settlement Agreement does not reflect the approval of, or acceptance of, any of the Settling Parties' marginal cost proposals. However, the Settling Parties agree that the designated marginal costs set forth in Paragraphs 4.A. of the Settlement Agreement may be used for the purpose of initially establishing unit marginal costs that are used in SCE's revenue allocation and rate design model (SCE's Model)."	D.16-03-030, p. 12.	
"This Settlement Does not reflect approval or acceptance of any of the Settling Parties' marginal cost proposals. The Settling Parties agree that it is reasonable to use the marginal costs set forth in this Paragraph 4.A. solely for the purpose of establishing unit marginal costs for use in SCE's revenue allocation and design model … ."	Marginal Cost and Revenue Allocation Settlement Agreement, p. 7.	
"In order to avoid further litigation and to mitigate potentially adverse impacts on any particular rate group based on directional movement towards cost-based rates in this proceeding, the Settling Parties	D.16-03-030 p. 12.	

agreed on how to allocate SCE's total revenue requirement on an overall revenue-neutral basis, to be effective after a Commission decision adopting this Settlement Agreement, based on a number of assumptions agreed upon by the Settling Parties." "This Settlement Agreement represents a compromise of disputed claims between the Settling Parties. … The Settling Parties assert that this Settlement Agreement is reasonable, consistent with law and in the public interest."	Marginal Cost and Revenue Allocation Settlement Agreement, p. 25.	

3. AECA was an active party to the Agricultural and Pumping Rate Group Rate Design Settlement Agreement.	D.16-03-030, pp. 3-6, and Agricultural and Pumping Rate Group Rate Design Settlement Agreement, p. 1.	
"Each Settling Party represents customers who are directly affected by and have an interest in the outcome of the A&P rate design issues in this proceeding."	Agricultural and Pumping Rate Group Rate Design Settlement Agreement p.2.	
AECA's participation in the Settlement Agreement contributed to an overall rate decrease for the agricultural class (-0.7%) compared to proposed 6.2% increase. (See 1.a and f above, raised by AECA testimony.)	D.16-03-030, pp. 30-31; Marginal Cost and Revenue Allocation Agreement p.10; and Agricultural and Pumping Rate Group Rate Design Settlement Agreement, Appendix B.	
AECA's participation in the Settlement Agreement resulted in modification of SCE's Rule 1 definition of Agricultural Power Service to include fluid milk producers. (See 1.e above, in AECA testimony.)	D.16-03-030, p.32, and Agricultural and Pumping Rate Group Rate Design Settlement Agreement, p.A-7.	
AECA's participation in the Settlement Agreement contributed to revisions to the time-related demand charges, super off-peak schedule, and time-of-use charges, compared to those proposed by SCE. (See 1.c above, raised by AECA testimony.)	D.16-03-030, pp. 33-36, and Agricultural and Pumping Rate Group Rate Design Settlement Agreement, pp. A-10 – A-12 and A-13.	
AECA's participation in the Settlement Agreement resulted in a "phase out" of the PA-ICE program. (See 1.d above, raised by AECA testimony.)	D.16-03-030, pp.36-38, and Agricultural and Pumping Rate Group Rate Design Settlement Agreement pp. A-16 – A-17.	

AECA's participation resulted in parties agreeing to additional analyses to examine an Agricultural Class Balancing Account. (See 1.b above, raised by AECA testimony.)	D.16-03-030, p.38, and Agricultural and Pumping Rate Group Rate Design Settlement Agreement p.A-18.	

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?	Yes	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes
c. If so, provide name of other parties: California Farm Bureau Federation (CFBF)		Yes
d. Intervenor's claim of non-duplication: AECA and CFBF have historically submitted separate testimony in CPUC proceedings, raising distinct, non-duplicative issues, including recommended rate changes. During settlement negotiations the two agricultural groups coordinated our efforts. While both parties seek reasonable rates for agricultural customers, AECA has also specifically advocated for rate stability and demand management incentives, and effectively identified flaws in SCE's development of marginal costs to calculate rates for the agricultural class. AECA has consistently documented allocation inconsistencies and volatility in SCE's application of EPMC principals to the agricultural class. Here, AECA's efforts resulted in rate decreases, rather than the increases proposed by SCE. In this proceeding, AECA also pursued the creation of demand-side management incentives, such as appropriate off-peak/peak energy rate differentials, discussion hydrologic balancing accounts, including fluid milk production in the definition of agricultural power service and continuation of the PA-ICE program. AECA's efforts to avoid duplication with other parties and dedicated pursuit of important issues should be recognized by the Commission.		Yes

C. Additional Comments on Part II:

#	Intervenor's Comment	CPUC Discussion
	AECA was an active party to the Settlement Agreements on Marginal Costs and Revenue Allocation and Agricultural Rate Design filed, respectively, on August 14, 2015 and October 29, 2015, which were adopted in D.16-03-030. As in previous SCE Phase II proceedings, the Settlement Agreements did not adopt any of the settling parties' specific marginal cost principles or proposals as the basis for the Settlement Agreements. The settling parties agreed to the negotiated settlements without litigating their various positions. AECA played a significant role in the final Revenue Allocation proposal reached as a part of the settlement. AECA successfully advocated for a moderated increase for agricultural customers. SCE had proposed to adjust all agricultural rates by 6% over system average rates. AECA's efforts in the proceeding, which cast considerable doubt on SCE's marginal cost methodologies, calculations and allocations as applied to the agricultural class, directly resulted in the 0.7% agricultural decrease ultimately adopted. AECA's active participation and expertise in the Agricultural Rate Design Settlement directly led to reduced adverse impacts on the agricultural class and more appropriate allocation of class-specific revenue. Additionally, AECA's participation resulted agreement to phase out the PA-ICE rates. AECA's active review and analysis of other parties' rate design proposals and associated implications also contributed substantially to the Settlement Agreements.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness:	**CPUC Discussion**
AECA's request for intervenor compensation seeks an award of $89,677.21 ($131,878.25 X .68). The requested award is reasonable in light of the benefits achieved through AECA's participation in the proceeding. AECA's efforts on marginal cost and revenue allocation resulted in a direct decrease from SCE's proposed 6% increase to 0.7% decrease for agricultural customers. The adopted agricultural class revenue requirement was based entirely on a broad settlement, which AECA played a significant role in achieving. AECA also played a significant role in the agricultural rate design aspect of	Verified

this proceeding, and in expanding PG&E's balancing account study to include participation by SCE and extending the PA-ICE program. While direct ratepayer benefits are hard to calculate for a potential balancing account, PA-ICE rates could rise between 20% and 70%. In sum, the Commission should conclude that AECA's overall request is reasonable in light of the substantial benefits to SCE's agricultural customers that are directly attributable to AECA's participation.	
b. Reasonableness of hours claimed: AECA's request is reasonable in light of the scope of the proceeding and the length and complexity of settlement negotiations. AECA's requested amount is far below its NOI total estimate of approximately $190,050. The reduced amount reflects AECA's efforts to effectively manage participation costs. AECA is not seeking travel or other costs of participation. In addition, AECA relied on well-priced economic experts to conduct research, respond to discovery, review data responses and conduct bill impact analysis and rate design scenarios, thereby minimizing attorney fees and further keeping costs in check. While this proceeding was not fully litigated through evidentiary hearings, settlement discussions were lengthy and complex, as reflected in the number of conference calls and exchanges necessary to achieve settlement of agricultural rate design issues. Given the number of parties involved in the overall proceeding, and also addressing agricultural class-related issues, and the complexity of the issues at stake, it is not unusual that settlement negotiations extended for many months. AECA submitted comprehensive testimony documenting ongoing shortcomings in SCE's marginal cost and revenue allocation methodologies and calculations. AECA's testimony also comprehensively addressed rate design issues specific to the agricultural class. ACEA submits that documented claimed hours are reasonable, both for each attorney and expert individually, and in the aggregate, and AECA respectfully asks that its request be granted.	Verified
c. Allocation of hours by issue: AECA's allocation of hours by issue are shown in the attached timesheets (Attachment 3).	Verified

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate $	Basis for Rate*	Total $	Hours	Rate $	Total $
Ann L. Trowbridge Attorney	2014	3.5	$405	D.15-12-041, Res. ALJ-303	$1,417.50	3.5	$405	$1,417.50
Ann L. Trowbridge Attorney	2015	27.8	$405	D.15-12-041, Res. ALJ-308	$11,259.00	27.8	$405	$11,259.00
Ann L. Trowbridge Attorney	2016	1.5	$405	D.15-12-041, Res. ALJ-308	$607.50	1.5	$410	$615.00
Steven Moss Consultant	2014	3.0	$215	D.15-12-041, Res. ALJ-303	$645.00	3.0	$215	$645.00
Steven Moss Consultant	2015	90.5	$215	D.15-12-041, Res. ALJ-308	$19,457.50	90.5	$220	$19,910.00
Richard McCann Consultant	2014	36.5	$210	D.15-12-041, Res. ALJ-303	$7,665.00	36.5	$210	$7,665.00
Richard McCann Consultant	2015	170.0	$210	D.15-12-041, Res. ALJ-308	$35,700.00	170.0	$210	$35,700.00
Michael Boccadoro Ex. Dir./Adv.	2014	9.5	$210	D.15-12-041, Res. ALJ-303	$1,995.00	9.5	$210	$1,995.00
Michael Boccadoro Ex. Dir./Adv.	2015	123.0	$210	D.15-12-041, Res. ALJ-308	$25,830.00	123.0	$210	$25,830.00
Michael Boccadoro Ex. Dir./Adv.	2016	6.5	$210	D.15-12-041, Res. ALJ-308	$1,365.00	6.5	$215	$1,397.50
Beth Olhasso Asst. Ex. Dir./ Adv.	2014	4.55	$155	D.15-12-041, Res. ALJ-303	$705.25	4.55	$155	$705.25

Beth Olhasso Asst. Ex. Dir./ Adv.	2015	75.5	$155	D.15-12-041, Res. ALJ-308	$11,702.50	75.5	$155	$11,702.50
Beth Olhasso Asst. Ex. Dir./ Adv.	2016	4.5	$155	D.15-12-041, Res. ALJ-308	$697.50	4.5	$155	$697.50
Elizabeth Stryjewski Consultant	2014	23.75	$75	D.15-12-041, Res. ALJ-303	$1,781.25	23.75	$75	$1,781.25
Elizabeth Stryjewski Consultant	2015	108.0	$75	D.15-12-041, Res. ALJ-308	$8,100.00	108.0	$75	$8,100.00
					***Subtotal:* $128,928.00**			***Subtotal:* $129,420.50**
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
Ann L. Trowbridge	2014	3.9	$202.50	D.15-12-041, Res. ALJ-303	$789.75	3.9	$202.50	$789.75
Ann L. Trowbridge	2016	4.2	$202.50	D.15-12-041, Res. ALJ-308	$850.50	4.2	$205.00	$861.00
Beth Olhasso	2014	4.5	$77.50	D.15-12-041, Res. ALJ-303	$348.75	4.5	$77.50	$348.75
Beth Olhasso	2016	8.0	$77.50	D.15-12-041, Res. ALJ-308	$620.00	8	$77.50	$620.00
Michael Boccadoro	2014	.75	$105.00	D.15-12-041, Res. ALJ-303	$78.75	.75	$105.00	$78.75
Michael Boccadoro	2016	2.5	$105.00	D.15-12-041, Res. ALJ-308	$262.50	2.5	$107.50	$262.50
					***Subtotal:* $2,950.25**			***Subtotal:* $2,960.75**
					TOTAL REQUEST:$131,878.25			**TOTAL AWARD: $132,381.30**

*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.

ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[1]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Ann L. Trowbridge	December 1993	169591	No

C. Comments on Part III:

Attachment or Comment #	Description/Comment
Comment 1	AECA is not claiming any costs in this request. AECA has used electronic mail communication, phone and conference calls to reduce filing and meeting costs and keep overall costs to a minimum, further adding to the reasonableness of its claim.
Comment 2	Rational for Ann Trowbridge's hourly rate: AECA is requesting an hourly rate of $405 in 2014, 2015, and 2016 for Ms. Trowbridge. Ms. Trowbridge last received $405 for work performed in 2015 (D.15-12-041). Her rate remains at $405 for 2016, which places her at the low end of the range for attorneys with 15 plus years of experience (see Res. ALJ-308). Ms. Trowbridge graduated from University of the Pacific, McGeorge School of Law in 1993, and has practiced extensively before the Commission since the late 1990's.
Comment 3	Rational for Michael Boccadoro's hourly rate: AECA is requesting an hourly rate of $210 for Mr. Boccadoro in 2014, 2015, and 2016. He last received $210 for work performed in 2015 (D.15-12-041). His rate remains at $210 for 2016. He has over 20 years of experience as an energy policy and resource management expert.
Comment 4	Rationale for Beth Olhasso's hourly rate: AECA is requesting an hourly rate of $155 for Ms. Olhasso in 2014, 2015, and 2016. She last received $155 for work performed in 2015 (D.15-12-041). Her rate remains at $155 for 2016. She has over 5 years of relevant experience.
Comment 5	Rationale for Steven Moss' hourly rate: AECA is requesting an hourly rate of $215 for Mr. Moss in 2014, 2015, and 2016. He last received $215 for work performed in 2014 (D.15-12-041). His rate remains at $215 for 2016. Mr. Moss has over 20 years of experience in energy consulting.
Comment 6	Rationale for Richard McCann's hourly rate: AECA is requesting an hourly rate of $210 for Dr. McCann in 2014, 2015, and 2016. He last received $210 for work performed in 2014 (D.15-12-041). His rate remains at $210 for 2016. Dr. McCann has over 20 years of experience in energy consulting.
Comment 8	Rationale for Elizabeth Stryjewski's hourly rate: AECA is requesting an hourly rate of $75 for Ms. Stryjewski in 2014, 2015, and 2016. She last received $75 for work performed in 2014 (D.15-12-041). Her rate remains at $75 for 2016. The requested rate is below the energy expert floor range of $140 to $200 for energy experts with 0-6 years of experience and is therefore reasonable. She has over 4 years of relevant experience.
Comment 9	Issue Codes for detailed time sheets and percent of time per issue (also see Att. 3):

[1] This information may be obtained through the State Bar of California's website at http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch .

	GP General Policy: 2.02% MC Marginal Cost Methods: 23.76% RA Revenue Allocation: 39.35% RD Rate Design: 19.73% HYDRO Balancing Account: 5.06% PG-ICE PA-ICE Tariff: 7.79% FM Fluid Milk (agricultural power service) definition: 2.28% Total: 100%

D. CPUC Disallowances and Adjustments:

Item	Reason
A	The Commission did not establish a rate for Stryjewski in D. 15-12-041 as AECA alleges. Documentation provided by AECA shows that Stryjewski has a MPIA from UC San Diego and experience performing technical analyses of environmental resources. The Commission finds reasonable Stryjewski's rate of $75 per hour for 2014, 2015, and 2016.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. AECA has made a substantial contribution to D.16-03-030.
2. The requested hourly rates for AECA's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed. The total of reasonable compensation is $132,381.30.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Agricultural Energy Consumers Association shall be awarded $132,381.30.

2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay Agricultural Energy Consumers Association the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning July 31, 2016, the 75th day after the filing of Agricultural Energy Consumers Association's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

4. This decision is effective today.

Dated August 18, 2016, at San Francisco, California.

MICHAEL PICKER
President
MICHEL PETER FLORIO
CATHERINE J.K. SANDOVAL
CARLA J. PETERMAN
LIANE M. RANDOLPH
Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D1608013	**Modifies Decision?**	No
Contribution Decision(s):	D1603030		
Proceeding(s):	A1406014		
Author:	ALJ Roscow		
Payer(s):	Southern California Edison Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Agricultural Energy Consumers Association	May 17, 2016	$131,878.25	$132,381.30	N/A	Increased Rates

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Ann	Trowbridge	Attorney	AECA	$405	2014	$405
Ann	Trowbridge	Attorney	AECA	$405	2015	$405
Ann	Trowbridge	Attorney	AECA	$410	2016	$410
Steven	Moss	Expert	AECA	$215	2014	$215
Steven	Moss	Expert	AECA	$215	2015	$220
Richard	McCann	Expert	AECA	$210	2014	$210
Richard	McCann	Expert	AECA	$210	2015	$210
Michael	Boccadoro	Expert	AECA	$210	2014	$210
Michael	Boccadoro	Expert	AECA	$210	2015	$210
Michael	Boccadoro	Expert	AECA	$210	2016	$215
Beth	Olhasso	Expert	AECA	$155	2014	$155
Beth	Olhasso	Expert	AECA	$155	2015	$155
Beth	Olhasso	Expert	AECA	$155	2016	$155
Elizabeth	Stryjewski	Expert	AECA	$75	2014	$75
Elizabeth	Stryjewski	Expert	AECA	$75	2015	$75

(END OF APPENDIX)