PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION Item 38 ID#4583

RESOLUTION G-3375 June 30, 2005

RESOLUTION

Resolution G-3375. Southern California Gas Company (SoCalGas) requests authorization to implement a new transmission service rate schedule, Schedule No. GT-DGN. Under Schedule No. GT-DGN, SoCalGas will offer firm and interruptible transmission service to the Distribuidora de Gas Natural de Mexicali, S. DE R.L. DE C.V. (DGN) Mexicali border receipt point located in Calexico. This resolution denies SoCalGas Advice Letter 3405 without prejudice.

By Advice Letter 3405 filed on September 10, 2004.

SUMMARY

So Cal Gas filed AL 3405 to seek authorization to offer firm and interruptible transmission service to the Distribuidora de Gas Natural de Mexicali, S. DE R.L. DE C.V. (DGN) Mexicali border receipt point located in Calexico. This resolution denies without prejudice SoCalGas' request for authority to implement this new service. Major elements of this resolution are summarized below.

1. The proposed new transmission service rate schedule would allow firm and interruptible transmission service to the California-Mexico border at Mexicali through its lines 6000 and 6002 which run through the Imperial Valley. This service could further constrain deliveries to SoCalGas' customers in the Imperial Valley, which is already considered a "constrained area."
2. Customers in the Imperial Valley are currently denied full requirements service when capacity is oversubscribed.
3. SoCalGas should not use the advice letter process to propose applying tariff conditions and rates to DGN's customers which were previously approved in a

decision that specifically applied only to SoCalGas and DGN under contractual terms.

4. SoCalGas' AL 3405 was protested by the Southern California Generation Coalition (SCGC), Sempra Energy Global Enterprises on behalf of DGN, and Southern California Edison Company (SCE). To the extent the protests recommended denial of AL 3405, the protests are granted.

BACKGROUND

The tariff service proposed in AL 3405 is for customers of DGN who currently take bundled service from DGN. The proposed service is in addition to the transportation service provided to DGN under contract.

In August 1996, the Mexican government awarded a license for natural gas distribution in the Mexicali area to DGN. DGN is now an affiliate of SoCalGas under Sempra.

In November 1995, the government of Mexico issued regulations that allow for licenses to be granted to private companies to construct and operate natural gas transmission and distribution pipelines in Mexico. In August 1996, after a competitive bidding process, the Mexican government awarded a license for natural gas distribution in the Mexicali area to Distribuidora de Gas Natural de Mexicali, S. DE R.L. DE C.V. (DGN). DGN is a Mexican corporation which prior to the merger of Enova and Pacific Enterprises was owned (1) 30% by subsidiaries of Pacific Enterprises (other than SoCalGas or its subsidiaries); (2) 30% by subsidiaries of Enova Corporation; and (3) 40% by Proxima, a Mexican corporation not otherwise affiliated with Pacific Enterprises or Enova Corporation. DGN is now an affiliate of SoCalGas under Sempra.

In January, 1997, SoCalGas and DGN entered into an agreement for gas transportation service.

Subsequent to the issuance by the Mexican government of the license for distribution service in the Mexicali region, SoCalGas entered into negotiations with DGN to provide gas transportation service across its system to a border crossing point to be constructed at the California – Mexico border at Mexicali. In January, 1997 SoCalGas and DGN entered into an agreement for this transportation service. Gas supplies and transportation upstream of the SoCalGas system would be the responsibility of DGN. The Service Agreement between SoCalGas and DGN provides for firm service as defined in SoCalGas' tariffs. Its terms are as follows: Firm service is for a maximum of 25,200 decatherms per day. Service above the firm volume may be provided on an interruptible basis. The term of the contract is 12 years (through 2009). SoCalGas is required to file with the Commission by the end of the eleventh year of the service agreement a tariff for default service to be applicable after the twelfth year of the contract. The initial volumetric rate was 3.5 cents per therm, with annual escalation equal to an inflation index less one percentage point. The service contract provides for a minimum monthly charge of 75% of the daily minimum quantity times the number of days in the month times the volumetric rate. The service contract also provided for a minimum annual charge of $600,000 plus interest for the first five years of the contract, payable at the end of the fifth year. There is also an exit fee in the event that DGN selects another transmission service provider during the 12-year term. The Agreement also includes Operational Flow Order provisions, fees for imbalances beyond allowed quantities, and a provision for dispute resolution that includes binding arbitration.[1]

SoCalGas applied for and received approval from the Federal Energy Regulatory Commission (FERC) for construction of border crossing facilities and other necessary approvals to deliver gas to Mexicali pursuant to Section 3 of the Federal Natural Gas Act. SoCalGas obtained FERC approval of the final location of the border crossing on May 16, 1997 (79 FERC ¶61,188). SoCalGas proceeded to construct a 14.4 mile pipeline extension (designated Line 6903) from the prior terminus of its service on Lines 6001, to the border crossing location, and to construct the actual border crossing facilities

1. D. 98-12-024, p 5.

The CPUC approved the SoCalGas-DGN agreement in D. 98-12-024.

On March 10, 1997, SoCalGas filed Application (A.) 97-03-015 with the Commission requesting approval of the Service Agreement. The California Public Utilities Commission (Commission or CPUC) issued D. 97-07-062 which granted SoCalGas interim authority to serve DGN under the terms of the Service Agreement, pending a final Commission decision. SoCalGas began service to DGN at the Mexicali border crossing in July 1997. The Commission approved the Service Agreement with DGN in D. 98-12-024.

In November 2000, the Commission initiated Order Instituting Investigation (I.) 00-11-002 into the adequacy of the SoCalGas and SDG&E gas supply and transmission system to provide service to present and future core and noncore customers of SDG&E.

This investigation was prompted by high gas demand during the summer of 2000 that threatened gas curtailments for SDG&E's noncore customers. In June 2000, SDG&E began to provide gas service to a new electric generator (EG) in Rosarito, Mexico[2], contributing to increased capacity demands. During this period, SoCalGas filed four Advice Letters which revealed a serious shortage of transmission capacity in its system. One of these advice letters, AL 3002, requested approval to implement the results of an Open Season, south of Niland Station (Line 6902) in the southern Imperial Valley. After SoCalGas first set aside capacity for core customers and DGN, (the Sempra affiliate increased usage that year), capacity was oversubscribed for 10 of the 24 months covered by the open season.

D.02-11-073 ordered SoCalGas to withdraw AL 3002 because the term of its open season was to end on May 30, 2003 without having been implemented and to hold

2. Commission Federal de Electricidad's Presidente Juarez Power Plant in Baja California Norte, Mexico (Rosarito) receives its natural gas supply exclusively through Gasoducto Rosarito (GR), a SDG&E affiliate. D.02-11-073.

another Open Season in accordance with provisions established in Section 1, Part B of that decision.

Currently, aside from the firm service capacity assigned in the 2003 open season, only interruptible transmission service is available until the term of the current Open Season ends on March 31, 2005.

Pursuant to D. 02-11-073, SoCalGas held an open season in 2003 for the Imperial Valley noncore customers. SoCalGas has designated the Imperial Valley as a constrained area in terms of gas transmission capacity. Currently, aside from the firm service capacity assigned in the 2003 open season, only interruptible transmission service is available until the term of the current Open Season ends on March 31, 2005. On September 21, 2004, the Commission approved SoCalGas AL 3398 which proposed to hold a new open season for noncore customers in the Imperial Valley in January 2005, the results of which are to be effective for a 24-month period starting April 1, 2005 through March 31. 2007. In AL 3405, SoCalGas seeks approval to establish a rate schedule to provide service to the DGN Mexicali border receipt point located in Calexico. This service would be similar to that which it provides to San Diego as a wholesale customer under its GT-SD tariff. DGN in not required to bid in Open Seasons as long as the Service Agreement with SoCalGas is in effect. In AL 3405, SoCalGas claims that its proposal will not cause the withdrawal of any service currently provided or impose more restrictive service conditions on SoCalGas customers.

Thomson, Inc. (Thomson) is a retail customer of DGN, which is now doing business in Mexico under the name “Ecogas”. Thomson wants SoCalGas to transport its customer-owned gas from the SoCalGas California border points into Mexico at the Mexicali border point on behalf of Thomson, not DGN.

Thomson contacted SoCalGas on October 28, 2003, and requested natural gas transportation service to the Mexicali border. Currently, Thomson’s gas is being transported through California under the firm intrastate contract between SoCalGas and DGN which the CPUC authorized in D.98-12-024. DGN then transports Thomson’s gas from the border to its plant in Mexicali. Thomson wants SoCalGas to transport its customer-owned gas from the SoCalGas California border points into Mexico at the Mexicali border point on behalf of Thomson, not DGN. With AL 3405, SoCalGas has submitted tariff sheets for rate schedule GT-DGN which outlines rates and rules for transporting gas through California for delivery to DGN at the Mexicali border receipt point located in Calexico.

NOTICE

Notice of AL 3405 was made by publication in the Commission's Daily Calendar. Southern California Gas states that a copy of the Advice Letter was mailed and distributed in accordance with Section 111-G of General Order 96-A.

PROTESTS

SoCalGas' AL 3405 was timely protested by Southern California Generation Coalition (SCGC), Sempra Energy Global Enterprises on behalf of DGN/Ecogas (DGN), and Southern California Edison (SCE). The following is a more detailed summary of the major issues raised in the protests:

On September 30, 2004, SCGC protested AL 3405 stating that the Imperial Valley local transmission system is currently designated a constrained area by SoCalGas. Among other things, SCGC argues that Schedule GT-DGN would degrade service to Imperial Valley customers.

With the new Schedule GT-DGN, customers in Mexico would be permitted to bid for service, which would degrade service to Imperial Valley customers who would receive even less firm service then they do currently. SCGC states that this constitutes a withdrawal of service. SCGC opposes SoCalGas' proposal that it be permitted to retain all incremental Schedule GT-DGN revenues because it believes SoCalGas currently receives 100 percent balancing account protection against any decline in throughput from existing customers. Furthermore, approval of Schedule GT-DGN would benefit DGN by increasing deliveries to DGN at Calexico above the levels currently permitted under the existing SoCalGas-DGN contract. Incremental deliveries to DGN above current contract levels would enhance DGN throughput and revenues, while degrading service to existing Imperial Valley customers.

SCGC also contends that Schedule GT-DGN conflicts with Commission precedent and is inconsistent with existing rate schedules.

According to SCGC, Schedule GT-DGN conflicts with Commission precedent and is inconsistent with existing rate schedules because: (1) Schedule GT-DGN fails to provide for recovery of the Interstate Transition Cost Surcharge (ITCS) which the Commission ordered in D.98-12-024; (2) Schedule GT-DGN conflicts with the Commission's D.02-12-017 which permits balancing account treatment for SoCalGas' transmission revenue requirement; (3) Schedule GT-DGN provides for an annual unspecified escalation of rates. SCGC states that rate changes are subject to approval of the Commission and are not matters to be left to utility discretion. (4) Schedule GT-DGN fails to require that SoCalGas must seek Commission approval of discounts for affiliate shippers as does Schedule GT-SD.

Furthermore, SCGC maintains that Schedule GT-DGN contains unprecedented provisions without explanation or justification such as exempting customers from provisions of SoCalGas Rule No. 30 and Schedule G-IMB. In apparent substitution for these exemptions, customers would be subject to Operational Flow Order (OFO) requirements and associated penalties. In addition, SoCalGas would be permitted to charge a minimum monthly charge to Schedule GT- DGN customers under this schedule. Lastly, Schedule GT-DGN contains a lengthy arbitration provision which is unprecedented in SoCalGas' Tariff. SCGC believes that a provision for resolution of disputes through arbitration rather than through the Commission's process should be considered upon application rather than through the advice letter process.

SCE contends that the proposed schedule provides DGN more favorable terms than other customers on SoCalGas system. First, SCE complains that AL 3405 creates new OFO language, not contained in the GT-SD tariff, which limits the number of OFO's to which DGN is subject to 10 times a year. Under the terms of AL 3405, SoCalGas is required to provide twenty-four hour notice prior to the nomination deadline for the day or days the OFO is to be effective, which SCE contends provides DGN more favorable terms than other customers on SoCalGas system who have no limitations on the number of OFO's nor any equivalent notice provisions. Second, SCE states that Special Condition 9 indicates that the term shall be two years, although page 2 of the cover letter indicates that the term of the contract is 12 years. Third, Special Condition 10, makes reference to "interstate pipeline capacity in existence on November 6, 1991", which SCE believes is erroneous as SoCalGas did not receive approval of the final location of the border crossing until May 16, 1997. Fourth, SCE objects to Special Conditions 12, 13, 15, and 16 which introduce Hourly Schedule Quantities and Maximum Hourly Quantities and hourly penalties stating that it is unclear if this major change is appropriate for DGN. Fifth, Special Conditions 13, 17, and 18 seem to presume an open season for rights, which SCE finds premature given that firm access rights have not been established yet. Sixth, Special Conditions 26, 27, and 28 pertain to binding arbitration rules. SCE does not understand the purpose of binding arbitration rules in a tariff designed to deal with an affiliate. Lastly, SCE finds it unclear whether the proposed tariff exempts DGN from the Excess Nominations and Winter Delivery Rules in Rule 30 and exempts DGN from Schedule G-IMB.

In its September 30, 2004 protest, DGN requests that the Commission suspend approval of AL 3405. Suspension would provide DGN time to evaluate whether, and if so the extent to which, its own tariffs and associated agreements with SoCalGas and/or DGN's customers must be modified in order to receive customer-owned gas at the SoCalGas/DGN interconnection and provide appropriate downstream services in Mexico.

DGN is a licensed gas distribution company doing business in and around the City of Mexicali in the State of Baja California Norte, Mexico. DGN receives gas transported to the international border by SoCalGas and transports and distributes that gas through its facilities to its retail service customers in Mexico. In its advice letter, SoCalGas indicates that DGN would be "responsible for establishing a tariff service to allow for the receipt of transported natural gas at the Mexicali border receipt point". At the present time, DGN procures gas supplies to meet 100 % of the load on its distribution system. Should SoCalGas provide firm transportation service to any DGN customer, there could be an impact on the operations and/or services provided by DGN. DGN indicated in its protest that it was actively evaluating the potential operational impacts serving a firm-transportation customer providing its own supply would have on the remainder of its customers, as well as any adjustments that may be required to (a) its current supply-procurement arrangements or (b) the terms of its operational balancing agreements with SoCalGas or its current customers. DGN believes that the results of this evaluation may require it to modify the terms and conditions under which it purchases gas supplies and/or serves a future transportation-only customer, and/or could implicate the need to modify the terms and conditions of DGN's operational balancing agreement and other service agreements with SoCalGas. DGN states that pending its evaluation, approval by the Commission of the proposed tariff would be premature. Although DGN anticipates in its September 30, 2004 letter that its evaluation would be completed within 30 to 60 days, when contacted by Energy Division staff on January 3, 2005, it had not yet made a determination of the impact Schedule GT-DGN would have on its services. In a later communication with Energy Division staff, DGN indicated that it wanted an additional 120-150 days to complete its analysis of the tariff implications for its operation.

On October 4, 2004, Thomson Inc., a global manufacturer which requested that SoCalGas file Schedule GT-DGN, submitted comments on AL 3405 stating that Thomson's intention is to allow its manufacturing facility in Mexicali to have the same opportunity to source natural gas supplies at competitive prices as other plants.

Thomson stated that it is held captive to the natural gas rates DGN negotiates for its facility in Mexicali. Deregulation in the U.S. allows Thomson to transport its customer-owned gas from the producer to the California border, and DGN has a transportation program in place that will allow Thomson to transport from the Mexico border to its plant. According to Thomson, the missing link is a transportation program in place to transport Thomson's gas from the California border to Mexico. Thomson's states that its objective is to have the same rights to transport through California, on an equal basis, as any other transportation customer.

RESPONSE TO PROTESTS

On October 7, 2004, SoCalGas responded to the protests of SCGC, SCE, and DGN.

SoCalGas disputes SCGC's and SCE's claim that the new Schedule GT-DGN would unfairly benefit DGN.

To the objections that SoCalGas has inserted several terms and conditions in this tariff that are not in any other SoCalGas tariff, SoCalGas states that the proposed tariff incorporates the terms and conditions of its CPUC-approved long-term contract between SoCalGas and DGN.

SoCalGas states that it is proposing to treat potential shippers behind DGN on a nondiscriminatory basis compared to its contract to serve DGN.

SoCalGas states that so long as the total demand of customers on the DGN system does not exceed DGN's firm contract quantity of 25 MMcfd, approval of the advice letter would have no effect on level of service to other Imperial Valley customers.

According to SoCalGas, should the sum of firm service to DGN and to customers behind DGN exceed 25 MMcfd, the tariff would allow customers behind DGN to contract for firm service on the same basis as similarly-situated customers in the Imperial Valley wishing to contract for firm service. SoCalGas states that it designed this tariff to provide shippers in Mexico an opportunity to contract for unbundled service on terms nondiscriminatory in comparison to those of the Commission-approved DGN contract.

SoCalGas states that it proposed excluding revenues under this schedule from the balancing account treatment because revenues from the existing DGN contract are explicitly excluded from the balancing account treatment afforded most noncore transportation revenues.

In response to SCGC's objection that SoCalGas proposed that it be permitted to retain all incremental Schedule GT-DGN revenues while currently receiving 100 % balancing account protection against decline in throughput from existing customers, SoCalGas states that it proposed this treatment because revenues from the DGN contract are explicitly excluded from the balancing account treatment afforded most noncore transportation revenues.

In response to SCE's protest that the OFO and binding arbitration conditions are different from those in Schedule GT-SD, SoCalGas states that these proposed conditions mirror those in DGN's CPUC-approved long-term contract.

In response to SCE's protest, SoCalGas points out that it does not seek approval of Schedule GT-DGN for the legal entity DGN, but that the tariff is designed to allow customers of DGN to contract for unbundled transportation service in order to be able to procure their own natural gas. In response to SCE's protest that the OFO and binding arbitration conditions are different from those in Schedule GT-SD, SoCalGas states that these proposed conditions mirror those in DGN's CPUC-approved long-term contract. With regard to SCE's concerns with Hourly Scheduled Quantities, Maximum Hourly Quantities, and open season rights, SoCalGas states that these conditions mirror the constrained area conditions in Schedule GT-F and that these conditions were incorporated to insure that all customers transporting gas in and through the Imperial Valley have the same contractual commitments. With regard to SCE's concern that DGN may be exempt from Rule 30 and Schedule No. G-IMB, SoCalGas again reiterates that this tariff is not for service to the legal entity DGN, but for customers of DGN.

In response to DGN's protest, SoCalGas does not object to the 30 to 60 days time estimated to complete this review.

In response to DGN's protest and its request that the Commission withhold approval of AL 3405 until DGN has time to research the changes required on their system to provide unbundled service, SoCalGas does not object to the 30-60 days estimated to complete this review.

SoCalGas made no response to the comments of Thomson filed on October 4, 2004.

DISCUSSION

At the time the Commission approved the SoCalGas-DGN contract, there was no evidence that there would be oversubscription in the Imperial Valley. Since that time, the Imperial Valley has become a constrained area.

There is no mention in either D. 97-07-062, which first granted SoCalGas' request for interim authority to serve DGN, and D. 98-12-024 the final decision which granted approval of the service agreement, of any concern by either SoCalGas or intervenors to the proceeding regarding capacity constraints in the event this contract was approved. Since that time, the Imperial Valley has become a constrained area. Conditions have changed.

The transportation service proposed by SoCalGas can only be provided through the Imperial Valley, which is considered a constrained area, and could lead to further constraints on SoCalGas' customers. SoCalGas needs to take into consideration its obligation to its customers within its service territory, and assure adequate capacity to its own customers before potentially providing additional firm service to customers outside its service territory.

SoCalGas presents no justification for its expansion of service to customers outside of its service territory through an area already deemed a constrained area.

SoCalGas' rationale for schedule GT-DGN is that it is proposing "to treat potential shippers behind DGN on a nondiscriminatory basis compared to its contract to serve DGN".[3] SoCalGas neglects to mention that its service to DGN was granted under a

3. SoCalGas Response to Protests of AL 3405, dated October 7, 2004.

contract approved by the Commission in response to an Application it filed. In fact, in its AL and response to protests, the utility ignores the plight of its current customers within the Imperial Valley who have been in an area designated as constrained for at least 4 years, and who receive partial requirements service when capacity is insufficient to support their demand. SoCalGas states that because deliveries to DGN have not exceeded the 25 MMcfd allowed by its contract, approval of AL 3405 would have no effect on the level of service to other customers served in the Imperial Valley. SoCalGas goes on to state that should the sum of firm service to DGN and to customers behind DGN potentially exceed 25 MMcfd, AL 3405 would allow customers behind DGN to contract for firm service on the same basis as similarly-situated customers in the Imperial Valley wishing to contract for firm service.[4] In its justification for approval of AL 3405, SoCalGas ignores the fact that the service it is proposing is for customers outside of its service territory to which it does not have an obligation on an equal basis with the California customers it is obligated to serve. Customers in the Imperial Valley have already been denied full requirements service when capacity is oversubscribed. There is no reason to further reduce capacity available to these customers in order to transport gas through the Imperial Valley so that customers in Mexicali, outside of SoCalGas territory, can receive gas. SoCalGas has made no proposal during the past 4 years in which this area has been constrained to increase capacity in the Imperial Valley in order to alleviate the current reduction of service to its existing customers. It cannot proceed to further reduce service in order to provide service to customers not in its service territory.

SoCalGas has arbitrarily decided to design the GT-DGN tariff to provide shippers in Mexico an opportunity to contract for unbundled service on terms comparable to those in the Commission-approved DGN contract.

4. SoCalGas Response to Protests, October 7, 2004.

In A. 97-03-015, the Commission and interested parties had an opportunity to examine SoCalGas' rationale for the contract, and after hearings, the Commission approved the SoCalGas contract with DGN. In AL 3405 and its proposed tariffs, SoCalGas has integrated tariff provisions with terms and conditions taken from its long-term contract with DGN, to craft rules for the transportation of gas through the Imperial Valley to the Mexico border. SoCalGas ignores the fact that the Commission approved the Long-Term Contract between SoCalGas and DGN in D. 98-12-024 in response to A. 97-03-015 filed by SoCalGas. In this action, SoCalGas takes authority previously granted by the Commission in a decision specifically for service to DGN and applies it to a tariff to be applicable to other customers, while also potentially reducing service to customers within its service territory.

It is also unclear whether DGN itself could apply for service under GT-DGN, for service apart from its contract with SoCalGas.

As we are denying SoCalGas' proposal in AL 3405, the protests to that advice letter are granted.

COMMENTS

Public Utilities Code section 311(g) (1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g) (2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

FINDINGS

1. SoCalGas filed AL 3405 on September 10, 2004 requesting approval of Schedule GT-DGN which would offer firm and interruptible transmission service to the Mexicali border receipt point.
2. The Imperial Valley is currently considered a constrained area.
3. Thomson is a DGN customer requesting this new service, and is located in Mexicali, which is not in SoCalGas territory,
4. The gas that would be delivered under rate schedule GT-DGN would be transported through the Imperial Valley.
5. Customers in the Imperial Valley are currently denied full requirements service when capacity is oversubscribed.
6. Protests to SoCalGas 3405 were filed on September 30, 2004 by SCGC, SCE, and DGN.
7. SoCalGas responded to the protests on October 7, 2004.
8. Approval of Schedule GT-DGN could lead to an exacerbation of the capacity constraints experienced by SoCalGas' California customers in the Imperial Valley.
9. SoCalGas should not further constrain Imperial Valley capacity in order to serve customers in Mexico.
10. SoCalGas should not propose applying tariff conditions to DGN's customers in an advice letter that were approved for SoCalGas in a decision that was a response to an Application.
11. Capacity constraint conditions in the Imperial Valley were not expected in the proceeding which led to the approval of the DGN contract with SoCalGas.
12. AL 3405 should be denied without prejudice.

THEREFORE IT IS ORDERED THAT:

1. **The request of SoCalGas for approval of rate schedule GT-DGN to provide firm and interruptible transmission service to DGN at the Mexicali border receipt**

point located in Calexico as described in AL 3405 filed September 10, 2004 is denied.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 30, 2005, the following Commissioners voting favorably thereon:

STEVE LARSON
Executive Director