

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter of:

THE ELECTRONIC APPLICATION OF )  
DUKE ENERGY KENTUCKY, INC., FOR )  
AUTHORITY TO 1) ADJUST NATURAL ) Case No. 2018-00261  
GAS RATES 2) APPROVAL OF A )  
DECOUPLING MECHANISM 3) )  
APPROVAL OF NEW TARIFFS; 4) ALL )  
OTHER REQUIRED APPROVALS, )  
WAIVERS, AND RELIEF )  
)

---

**MOTION FOR CONFIDENTIAL TREATMENT OF  
DUKE ENERGY KENTUCKY, INC.  
FOR CERTAIN RESPONSES TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION**

---

Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), by counsel, pursuant to 807 KAR 5:001, Section 13 and other law, and respectfully requests the Commission to classify and protect certain information provided by the Company in its Responses to Commission Staff's First Request for Information issued on August 24, 2018, respectfully stating as follows:

1. On August 1, 2018 Duke Energy Kentucky filed a Notice of Intent to File an Application seeking adjustment of its gas rates and other approvals.
2. On August 31, 2018 Duke Energy Kentucky filed an Application seeking an adjustment of its natural gas rates and other approvals.
3. On August 24, 2018 Commission Staff issued its First Request for Information to Duke Energy Kentucky.

4. In response to Commission Staff's First Request for Information, Duke Energy Kentucky is providing certain information for which it requests confidential treatment.

5. The information for which Duke Energy Kentucky seeks confidential treatment is contained in its Responses to Requests 8, 48a. (9), 50, 51, 53, 65, 67, 68, and 69, which is referred to herein as the "Confidential Information" and, broadly speaking, includes detailed information pertaining to the internal policies and procedures, personal compensation information of Duke Energy Kentucky employees, contracts with outside vendors and other information.

6. Request No. 8 of Commission Staff's First Request for Information states as follows:

Provide Duke Kentucky's internal accounting manuals, directives, and policies and procedures.

7. In its response to Request No. 8, Duke Energy Kentucky is providing copies of its internal accounting policies and procedures.

8. Request No. 48a. (9) of Commission Staff's First Request for Information states as follows:

Provide the following tax data for the most recent calendar year:

a. Income taxes:

(9) A copy of federal and state income tax returns for the most recent tax year, including supporting schedules.

9. In its response to Request No. 48a. (9), Duke Energy Kentucky is providing copies of both its state and federal tax returns. This information is highly confidential and proprietary to the Company, and includes its Federal Tax Identification information. This information is historically considered confidential by the Commission.

10. Request No. 50 of Commission Staff's First Request for Information states as follows:

Provide the utility's written policies on the compensation of outside attorneys, auditors, consultants, and all other professional service providers. Include a schedule of fees, per diems, and other compensation in effect during the base period. Include all agreements, contracts, memoranda of understanding, and any other documentation that explains the nature and type of reimbursement paid for professional services. Indicate if any changes have occurred since the test year of the utility's last base rate case, the effective date of these changes, and the reason for these changes.

11. In response to Request No. 50, Duke Energy Kentucky is providing copies of contracts with outside vendors, internal policies and procedures as well as templates. This information is considered highly confidential by the Company and contains, among other things, the standard terms and conditions for services, and actual negotiated terms and compensation for services that the Company either insists of or negotiates with its vendors, which, if made publicly available would place the Company at a competitive disadvantage as it negotiates contracts in the future. The numerous contracts provided in this response include specific projects and scopes of work and the vendor pricing for providing these services. If this information was made publicly available, it would also place these vendors at a competitive disadvantage as they bid on and negotiate future work as their competitors would have insight into pricing for services that they otherwise would not have access too.

12. Request No. 51 of Commission Staff's First Request for Information states as follows:

Provide a detailed analysis of expenses for professional services during the most recent 12-month period for which information is available at the time the application is filed, as shown in Schedule 51, and all work papers supporting the analysis. At a minimum, the work papers should show the payee, dollar amount, reference (i.e., voucher no., etc.), account charged,

hourly rates and time charged to the company according to each invoice, and a description of the services provided.

13. In its response to Request 51, Duke Energy Kentucky is filing sensitive vendor information.

14. Request No. 53 of Commission Staff's First Request for Information states as follows:

Regarding Duke Kentucky's employee compensation policy:

- a. Provide Duke Kentucky's written compensation policy as approved by the Board of Directors.
- b. Provide a narrative description of the compensation policy, including the reasons for establishing the policy and Duke Kentucky's objectives for the policy.
- c. Explain whether the compensation policy was developed with the assistance of an outside consultant. If the compensation policy was developed or reviewed by a consultant, provide any study or report provided by the consultant.
- d. Explain when Duke Kentucky's compensation policy was last reviewed or given consideration by the Board of Directors.

15. In its response to Request No. 53, Duke Energy Kentucky is providing a copy of its internal presentation made to its Compensation Committee.

16. Request No. 65 of Commission Staff's First Request for Information states as follows:

Provide the information requested in Schedule 65 for yearly salary and benefit information for each corporate officer and as a group in total by category of Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly for the years 2013 through 2016 and the base period (in gross dollars-not hourly or monthly rates). Commission Staff will provide Schedule 65 in Excel format by electronic mail to Counsel for all parties.

- a. Regular salary or pay.
- b. Overtime pay.
- c. Excess vacation payout.
- d. Standby/Dispatch pay.
- e. Bonus and incentive pay.

- f. Any other forms of incentives (may include stock options or forms of deferred compensation).
- g. Other amounts paid and reported on the employees' W-2 (specify).
- h. Healthcare benefit cost for employees.
  - (1) Amount paid by the employer.
  - (2) Amount paid by the employee.
- i. Dental benefits cost for employees.
  - (1) Amount paid by the employer.
  - (2) Amount paid by the employee.
- j. Vision benefits cost for employees.
  - (1) Amount paid by the employer.
  - (2) Amount paid by the employee.
- k. Life insurance cost for employees.
  - (1) Amount paid by the employer.
  - (2) Amount paid by the employee.
- l. Accidental death and disability benefits.
  - (1) Amount paid by the employer.
  - (2) Amount paid by the employee.
- m. Defined Contribution - 401 (k) or similar plan cost for employees. Provide the amount paid by the employer.
- n. Defined Benefit Retirement cost for employees.
  - (1) Amount paid by the employer.
  - (2) Amount paid by the employee.
- o. Cost of any other benefit available to an employee (specify).

17. In its response to Request No. 65, Duke Energy Kentucky is providing sensitive compensation and benefit information for its employees. This information is considered highly confidential as its current employees and potential employees consider the value of its compensation information as part of their employment status decision. Duke Energy Kentucky and Duke Energy Corp compete for employees among a robust pool of employers, including other regional utilities. The level of benefits provided by the companies is instrumental in recruiting and retaining highly qualified employees. If competitors had ready access to this information, they could use it to place Duke Energy Corp and Duke Energy Kentucky at a disadvantage in recruiting and retaining employees.

18. Request No. 67 of Commission Staff's First Request for Information states as follows:

Provide a listing of all health care plan categories, dental plan categories, and vision plan categories available to corporate officers individually, and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees (i.e., single, married no dependents, single parent with dependents, family, etc.) Include the associated employee contribution rates and employer contribution rates of the total premium cost for each category and each plan's deductible(s) amount.

19. In its response to Request No. 67, Duke Energy Kentucky is providing sensitive benefit information for its employees.

20. Request No. 68 of Commission Staff's First Request for Information states as follows:

Provide a listing of all life insurance plan categories available to corporate officers individually, and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees. Include the associated employee contribution rates and employer contribution rates of the total premium cost for each plan category.

21. In its response to Request No. 68, Duke Energy Kentucky is providing sensitive benefit information for its employees.

22. Request No. 69 of Commission Staff's First Request for Information states as follows:

Provide a listing of all retirement plans categories available to corporate officers individually, and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees. Include the associated employee contribution rates and employer contribution rates of the total premium cost for each plan category.

23. In its response to Request No. 69, Duke Energy Kentucky is providing sensitive benefit information for its employees.

24. Contemporaneous with the filing of this Motion, Duke Energy Kentucky is tendering documentation responsive to Commission Staff's Request Nos. 8, 48a. (9), 50, 51, 53, 65, 67, 68, and 69. The Confidential Information provided is proprietary information that is retained by Duke Energy Kentucky on a "need-to-know" basis. The Confidential Information is distributed within Duke Energy Kentucky only to the Chief Executive Officer, Senior Management and the Board, who must have access for business reasons, and it is generally recognized as confidential and proprietary in the energy industry and in business generally. Specifically, the Confidential Information contains internal accounting policies, compensation and benefit information for Duke Energy Kentucky employees along with surveys and studies provided by third party vendors under agreements for use and is used by Duke Energy Kentucky to determine compensation and benefit offerings, internal presentations regarding compensation and benefit offerings, and invoices from third party vendors. The Company's internal accounting procedures are considered proprietary and trade secret information as they contain sensitive business operations procedures, which if made available, would potentially harm Duke Energy and Duke Energy Kentucky. If released publicly, Competitors would have insight into the internal operations of Duke Energy Corp., which they could then use and incorporate into their own business strategies, to the detriment of Duke Energy and its customers. Duke Energy's procedures were developed over years of operation and its internal processes, procedures, and they should not be made public. Similarly, the information obtained from third party vendors was provided in accordance with licensing agreements or other contracts that should be protected. This information has value to these vendors and if publicly released would place Duke Energy Kentucky at a disadvantage in being able to procure such services in the future. Vendors may be unwilling to provide such services to Duke Energy Kentucky at the same or lower costs if it is

known that such costs would be made public. Releasing such vendor information will hinder their ability to provide similar services as their costs to Duke Energy Kentucky would be used against them in other negotiations. For these reasons, this information should also remain confidential.

25. The Kentucky Open Records Act and applicable precedent exempts the Confidential Information from disclosure. *See* KRS 61.878(1)(a); KRS 61.878(1)(c)(1); *Zink v. Department of Workers Claims, Labor Cabinet*, 902 S.W.2d 825 (Ky. App. 1994); *Hoy v. Kentucky Industrial Revitalization Authority*, 907 S.W.2d 766, 768 (Ky. 1995). The Confidential Information includes information regarding benefit amounts for Duke Energy Kentucky employees. Benefit information is personal and private information and should not be in the public realm. Furthermore, the surveys, studies and presentations used by Duke Energy Kentucky to determine compensation and benefit offerings are highly confidential and subject to proprietary protection of third party vendors. The Commission has previously granted confidential protection to these types of surveys, studies, etc.<sup>1</sup> Additionally, public disclosure of these sensitive documents would unnecessarily provide interested parties and Duke Energy Kentucky's competitors with access to exclusive information regarding employee compensation. By knowing what Duke Energy Kentucky compensates each of its employees, it would be very easy for other utilities to attempt to poach Duke Energy Kentucky's workforce and management. Such public disclosure could unfairly harm Duke Energy Kentucky's competitive position in the marketplace for utility management and a skilled workforce, to the detriment of Duke Energy

---

<sup>1</sup> *In the Matter of the Application of Water Service Corporation of Kentucky for a General Adjustment of Rates*, Order, Case No. 2015-00382 (Ky. P.S.C. Apr. 5, 2016). *In the Matter of: Electronic Application of Duke Energy Kentucky, Inc. for: 1) An Adjustment of the Electric Rates; 2: Approval of an Environmental Compliance Plan and Surcharge Mechanism; 3) Approval of New Tariffs; 4) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities and 5) All Other Required Approvals and Relief*, Order, Case No. 2017-00321 (Ky. P.S.C. May 4, 2018).



Kentucky and its customers. For these reasons, the Confidential Information satisfies both the statutory and common law standards for affording confidential treatment. Indeed, the Commission has already recognized the confidential nature of the Confidential Information and has afforded confidential treatment to similar compensation and wage documents in prior proceedings.<sup>2</sup>

26. Furthermore, some of the information for which Duke Energy Kentucky is seeking confidential treatment was either developed internally, or acquired on a proprietary basis, by Duke Energy Corporation and Duke Energy Kentucky personnel, is not on file publicly with any public agency, and is not publicly available from any commercial or other source. The aforementioned information is distributed within Duke Energy Kentucky only to those employees who must have access for business reasons, and is generally recognized as confidential and proprietary in the utility industry.

27. Duke Energy Kentucky does not object to limited disclosure of the Confidential Information described herein, pursuant to an acceptable protective agreement entered into with any intervenors with a legitimate interest in reviewing the same for the sole purpose of participating in this case.

28. In accordance with the provisions of 807 KAR 5:001, Section 13(2)(e), the Company is filing one copy of the Confidential Information separately under seal, and the appropriate number of copies with the Confidential Information redacted.

29. Duke Energy Kentucky respectfully requests that the Confidential Information be withheld from public disclosure for a period of twenty years. This will assure that the

---

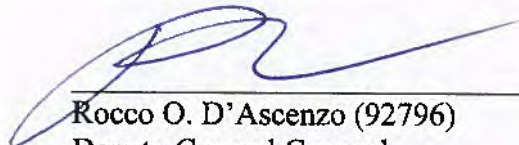
<sup>2</sup> *Id.*, See also, *In the Matter of the Application of Kentucky Utilities Company for an Adjustment of its Electric Rates*, Order, Case No. 2014-00371 (Ky. P.S.C., Jan. 29, 2016).

Confidential Information – if disclosed after that time – will no longer be commercially sensitive so as to likely impair the interests of the Company if publicly disclosed.

30. To the extent the Confidential Information becomes generally available to the public, whether through filings required by other agencies or otherwise, Duke Energy Kentucky will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10)(a).

WHEREFORE, Duke Energy Kentucky, Inc., respectfully requests that the Commission classify and protect as confidential the specific information described herein.

Respectfully submitted,



---

Rocco O. D'Ascenzo (92796)  
Deputy General Counsel  
Duke Energy Business Services, LLC  
139 East Fourth Street, 1313 Main  
Cincinnati, Ohio 45201  
Phone: (513) 287-4320  
Fax: (513) 287-4385  
E-mail: rocco.d'ascenzo@duke-energy.com

and

David S. Samford  
L. Allyson Honaker  
GOSS SAMFORD, PLLC  
2365 Harrodsburg Road, Suite B-325  
Lexington, KY 40504  
(859) 368-7740  
Email: David@gosssamfordlaw.com  
Email: Allyson@gosssamfordlaw.com

*Counsel for Duke Energy Kentucky, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on September 14, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being delivered via 2<sup>nd</sup> day delivery to the Commission on the 14th day of September, 2018 and a copy of the filing is also being mailed to the following:

Hon. Rebecca W. Goodman  
Hon. Larry Cook  
Hon. Kent Chandler



---

*Counsel for Duke Energy Kentucky, Inc.*

**KYPSC CASE NO. 2018-00261**  
**STAFF FIRST SET**  
**TABLE OF CONTENTS**

<b><u>DATA REQUEST</u></b>	<b><u>WITNESS</u></b>	<b><u>TAB NO.</u></b>
STAFF-DR-01-001	Amy B. Spiller .....	1
STAFF-DR-01-002	Jeffrey Setser .....	2
STAFF-DR-01-003	Michael Covington .....	3
STAFF-DR-01-004	Robert H. Pratt .....	4
STAFF-DR-01-005	Robert H. Pratt .....	5
STAFF-DR-01-006	Michael Covington .....	6
STAFF-DR-01-007	Michael Covington .....	7
STAFF-DR-01-008	Michael Covington .....	8
STAFF-DR-01-009	Robert H. Pratt .....	9
STAFF-DR-01-010	James E. Ziolkowski .....	10
STAFF-DR-01-011	Gary J. Hebbeler .....	11
STAFF-DR-01-012	Gary J. Hebbeler .....	12
STAFF-DR-01-013	Robert H. Pratt / Sarah E. Lawler.....	13
STAFF-DR-01-014	Cynthia S. Lee .....	14
STAFF-DR-01-015	Sarah E. Lawler.....	15

STAFF-DR-01-016	Robert H. Pratt / Sarah E. Lawler.....	16
STAFF-DR-01-017	Robert H. Pratt / Cynthia S. Lee .....	17
STAFF-DR-01-018	Robert H. Pratt / Cynthia S. Lee .....	18
STAFF-DR-01-019	Cynthia S. Lee .....	19
STAFF-DR-01-020	Robert H. Pratt / Cynthia S. Lee .....	20
STAFF-DR-01-021	Robert H. Pratt / Cynthia S. Lee .....	21
STAFF-DR-01-022	Robert H. Pratt / Cynthia S. Lee .....	22
STAFF-DR-01-023	Cynthia S. Lee .....	23
STAFF-DR-01-024	Cynthia S. Lee .....	24
STAFF-DR-01-025	John J. Spanos .....	25
STAFF-DR-01-026	Michael Covington .....	26
STAFF-DR-01-027	Bruce L. Sailors .....	27
STAFF-DR-01-028	Michael Covington .....	28
STAFF-DR-01-029	James E. Ziolkowski .....	29
STAFF-DR-01-030	Gary Hebbeler / Michael Covington .....	30
STAFF-DR-01-031	Michael Covington .....	31
STAFF-DR-01-032	Michael Covington .....	32

STAFF-DR-01-033	Renee H. Metzler .....	33
STAFF-DR-01-034	Renee H. Metzler .....	34
STAFF-DR-01-035	Renee H. Metzler .....	35
STAFF-DR-01-036	Renee H. Metzler .....	36
STAFF-DR-01-037	Renee H. Metzler .....	37
STAFF-DR-01-038	Robert H. Pratt / Michael Covington .....	38
STAFF-DR-01-039	Renee H. Metzler .....	39
STAFF-DR-01-040	Renee H. Metzler .....	40
STAFF-DR-01-041	Renee H. Metzler .....	41
STAFF-DR-01-042	Renee H. Metzler .....	42
STAFF-DR-01-043	Renee H. Metzler .....	43
STAFF-DR-01-044	Jeffrey R. Setser / Michael Covington .....	44
STAFF-DR-01-045	Jeffrey R. Setser / Cynthia S. Lee / Michael Covington .....	45
STAFF-DR-01-046	Sarah E. Lawler .....	46
STAFF-DR-01-047	John R. Panizza .....	47
STAFF-DR-01-048	John R. Panizza .....	48
STAFF-DR-01-049	Michael Covington .....	49
STAFF-DR-01-050	Legal .....	50

STAFF-DR-01-051	Michael Covington .....	51
STAFF-DR-01-052	Michael Covington .....	52
STAFF-DR-01-053	Renee H. Metzler .....	53
STAFF-DR-01-054	Renee H. Metzler .....	54
STAFF-DR-01-055	Renee H. Metzler .....	55
STAFF-DR-01-056	William Don Wathen Jr / Bruce L. Sailors .....	56
STAFF-DR-01-057	Michael Covington .....	57
STAFF-DR-01-058	Sarah E. Lawler .....	58
STAFF-DR-01-059	Jeffrey R. Setser .....	59
STAFF-DR-01-060	Jeffrey R. Setser / Michael Covington .....	60
STAFF-DR-01-061	William Don Wathen Jr .....	61
STAFF-DR-01-062	James E. Ziolkowski .....	62
STAFF-DR-01-063	Robert H. Pratt / Gary Hebbeler .....	63
STAFF-DR-01-064	Robert H. Pratt / Sarah E. Lawler / Cynthia S. Lee .....	64
STAFF-DR-01-065	Renee H. Metzler .....	65
STAFF-DR-01-066	Renee H. Metzler .....	66
STAFF-DR-01-067	Renee H. Metzler .....	67
STAFF-DR-01-068	Renee H. Metzler .....	68

STAFF-DR-01-069                      Renee H. Metzler ..... 69

STAFF-DR-01-070                      Renee H. Metzler ..... 70

STAFF-DR-01-071                      Sarah E. Lawler / Benjamin Passty /  
Bruce L. Sailors / William Don Wathen Jr /  
John Panizza / Tyler Barbare ..... 71

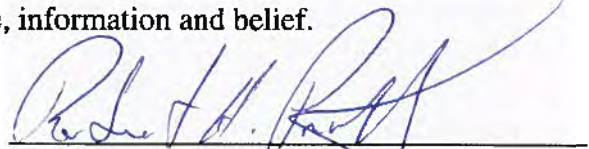




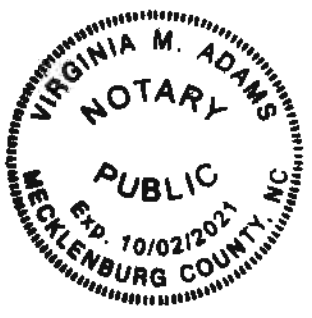
**VERIFICATION**


**STATE OF NORTH CAROLINA**        )  
  )  
**COUNTY OF MECKLENBURG**        )        **SS:**

The undersigned, Robert H. "Beau" Pratt., Director, Regional Financial Forecasting, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Robert H. "Beau" Pratt Affiant

Subscribed and sworn to before me by Robert H. "Beau" Pratt on this 30 day of August, 2018.



  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 10/2/21

**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        SS:

The undersigned, Sarah E. Lawler, Director Rates & Regulatory Planning, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

  
\_\_\_\_\_  
Sarah E. Lawler Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this 4<sup>th</sup> day of September, 2018.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2022




**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        **SS:**

The undersigned, James E. Ziolkowski, Director, Rates & Regulatory Planning, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_ James E. Ziolkowski Affiant

Subscribed and sworn to before me by James E. Ziolkowski on this 4<sup>TH</sup> day of SEPTEMBER, 2018.

  
\_\_\_\_\_ NOTARY PUBLIC


**ADELE M. FRISCH**  
Notary Public, State of Ohio  
My Commission Expires 01-05-2019

My Commission Expires: 1/5/2019

**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON        )

The undersigned, Amy B. Spiller, State President of Duke Energy Ohio, Inc. and its subsidiary, Duke Energy Kentucky, Inc., being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests and that the answers are true and correct to the best of her knowledge, information and belief.

  
\_\_\_\_\_  
Amy B. Spiller, Affiant

Subscribed and sworn to before me by Amy B. Spiller, on this 4<sup>TH</sup> day of SEPTEMBER, 2018.

ADELE M. FRISCH  
Notary Public, State of Ohio  
My Commission Expires 01-05-2019

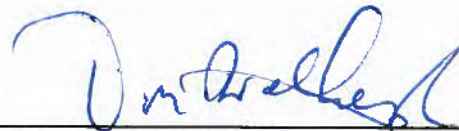
  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 1/5/2019

**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        SS:

The undersigned, William Don Wathen Jr., Director of Rates & Regulatory Strategy, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.



\_\_\_\_\_  
William Don Wathen Jr., Affiant

Subscribed and sworn to before me by William Don Wathen Jr., on this 4<sup>TH</sup> day of SEPTEMBER 2018.



\_\_\_\_\_  
NOTARY PUBLIC

**ADELE M. FRISCH**  
Notary Public, State of Ohio  
My Commission Expires 01-05-2019

My Commission Expires: 1/5/2019











**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        SS:

The undersigned, Bruce L. Sailers, Pricing and Regulatory Solutions Manager, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Bruce L. Sailers  
Bruce L. Sailers, Affiant

Subscribed and sworn to before me by Bruce L. Sailers, on this 10<sup>th</sup> day of SEPTEMBER, 2018.

ADELE M. FRISCH  
Notary Public, State of Ohio  
My Commission Expires 01-05-2019

Adelle M. Frisch  
NOTARY PUBLIC

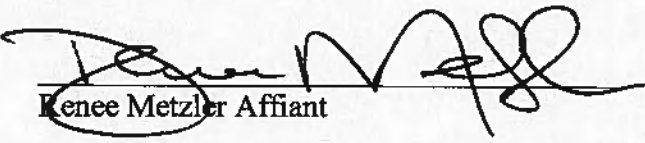
My Commission Expires: 1/5/2019



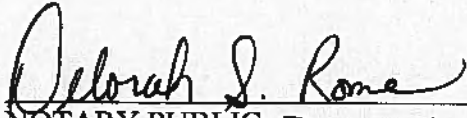
VERIFICATION

STATE OF NORTH CAROLINA        )  
  )        SS:  
COUNTY OF MECKLENBURG        )

The undersigned, Renee Metzler, Managing Director – Retirement and Health and Welfare, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

  
Renee Metzler Affiant

Subscribed and sworn to before me by Renee Metzler on this 10 day of September, 2018.

  
NOTARY PUBLIC Deborah S. Rome

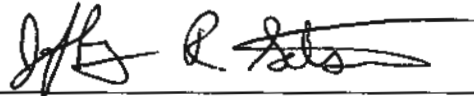
My Commission Expires: January 24, 2020



VERIFICATION

STATE OF NORTH CAROLINA )  
 ) SS:  
COUNTY OF MECKLENBURG )

The undersigned, Jeffrey R. Setser, Director of Allocations and Reporting, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Jeffrey R. Setser Affiant

Subscribed and sworn to before me by Jeffrey R. Setser on this 11 day of September 2018.



  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 10/2/21