

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Electronic Application Of Kentucky Power Company For )  
(1) A General Adjustment Of Its Rates For Electric Service; )  
(2) Approval Of Tariffs And Riders; (3) Approval Of )  
Accounting Practices To Establish Regulatory Assets And ) Case No. 2020-00174  
Liabilities; (4) Approval Of A Certificate Of Public )  
Convenience And Necessity; And (5) All Other Required )  
Approvals And Relief )

**Joint Intervenors, Mountain Association, Kentuckians for the Commonwealth, and  
Kentucky Solar Energy Society's Response To Kentucky Power Company's Data Requests**

KPC DR JI 1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Joshua Bills in electronic format, with formulas intact and visible, and no pasted values.

**KPC DR JI 1 RESPONSE:**

In preparing the testimony I referred to KPC Tariff of record (last changed 2020-09-28) on the PSC Tariff Library page, <https://psc.ky.gov/Home/Library?type=Tariffs&folder=Electric%5CKentucky%20Power%20Company>. I also referred to KPC's Proposed Tariff and Proposed Tariff Comparison KPC submitted in its Filing Requirements as KPCO\_APP\_Section\_II\_Volume\_2\_Filing\_Requirements\_and\_Exhibits\_D\_and\_E.

Witness: Joshua Bills

KPC DR JI 2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Bills. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

**KPC DR JI 2 RESPONSE:**

Referenced in my testimony was KPC's response to Staff 4-82, KPCO\_R\_KPSC\_4-82\_Attachment1. I also referred to the Net Metering Interconnection Guidelines that came out of PSC Administrative Case 2008-00169, which is hosted on the PSC website, <https://www.psc.ky.gov/agencies/psc/Industry/Electric/Final%20Net%20Metering-Interconnection%20Guidelines%201-8-09.pdf>  
See additional source provided in response to KPC DR JI 4 below.

Witness: Joshua Bills

KPC DR JI 3. Please confirm that the customers served under the Company's current N.M.S. tariff are being provided with greater intra-class subsidies as compared to customers who would take service under the Company's proposed N.M.S. II tariff. If your response is anything other than an unqualified confirmation please provide all evidence supporting the response, including but not limited to, all calculations supporting the response. All such calculations should be provided in an electronic format, with formulas intact and visible, and no pasted values.

**KPC DR JI 3 RESPONSE:**

I cannot confirm that the customers served under the Company's current N.M.S. tariff are being provided with greater intra-class subsidies as compared to customers who would take service under Company's proposed N.M.S. II.

Witness: Joshua Bills

KPC DR JI 4. Please provide all facts, including all relevant documents, that support Mr. Bills claim that, as of September 16, 2020, there is 87.32 kW (AC) of installed N.M.S. capacity for Large General Service in the Company's service territory.

**KPC DR JI 4 RESPONSE:**

See KPC's response to Staff 4-82, KPCO\_R\_KPSC\_4-82\_Attachment1, which lists 30.0 kW (AC) for Large General Service as of the end of the test year. Attachment 4.1 to KPC DR 1 is approval for 45-kW (AC) N.M.S. for an LGS customer and Attachment 4.2 to KPC DR 1 is approval for a 12.32 kW (AC) N.M.S. an LGS customer.

Witness: Joshua Bills

KPC DR JI 5. Refer to the testimony of Joshua Bills, page 5, lines 2 through 5. Mr. Bills claims that the Company’s calculation of avoided-cost rate for N.M.S. II, “does not address the impacts of G.S. and L.G.S. participants paying demand charges from which fixed costs are generally recovered” but offers no rate design recommendations addressing those alleged impacts.

(a) Please confirm that the Joint Intervenors are not making any recommendations with respect to this aspect of the avoided-cost rate design.

(b) If your response is anything other than an unqualified confirmation please provide all evidence supporting the response, including but not limited to, all calculations supporting the response. All such calculations should be provided in an electronic format, with formulas intact and visible, and no pasted values.

**KPC DR JI 5 RESPONSE:**

(a) Please see the PSC First Data Request, PSC DR JI 1 response.

(b) I recommend KPC not implement NMS II, but maintain NMS until Case No. 2020-00302 is completed. Additionally, as stated in my testimony, I second Mr. James Owen’s proposal in his written testimony that the Commission convene a Workshop or Administrative Case, to which all regulated utilities and interested stakeholders would be party, to develop a fair, just, reasonable, and consistent methodology for analyzing the value of distributed generation and net metering, using a comprehensive benefit-cost analysis framework.

Witness: Joshua Bills

KPC DR JI 6. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Andrew McDonald. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

**KPC DR JI 6 RESPONSE:**

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Please see: Attachment 6.1 to KPC DR1\_Potential Financial Impact of NM on KPC Res Customers 10-06-20.xlsx

Attachment 6.2 to KPC DR1\_ Benefit Cost Analysis for DERs - NSPM\_08-04-2020.pdf (*National Standard Practice Manual For Benefit-Cost Analysis of Distributed Energy Resources*, August 2020, National Energy Screening Project).

KPC DR JI 7. Refer to the testimony of Mr. McDonald on page 6, starting on line 1, which states: “For multiple years KPC worked alongside other investor owned utilities, East Kentucky Power Cooperative, and industry lobbyists to lobby the legislature to change the Kentucky’s net metering statute, on the premise that net metering was causing an unfair cost-shift between ratepayers and presumably causing a measureable, non-negligible financial impacts to the general ratepayer.” Please provide all facts, including all relevant documents, which support this statement.

**KPC DR JI 7 RESPONSE:**

I have been involved in policy discussions regarding net metering with Kentucky state agencies, legislators, LRC staff, utilities, and solar advocates for the past 17 years. From 2014 to 2016 I participated in a series of meetings between utilities and solar advocates to discuss potential changes to Kentucky’s net metering statute. Based on my recollections, among the utilities regularly present at these meeting were representatives from KPC.

In 2015 Senator Morgan McGarvey convened a working group of representatives from electric utilities, solar advocates, the Kentucky Department for Energy Development and Independence, and the Public Service Commission to discuss potential revisions to Kentucky’s net metering statute. I participated in this working group and recall at least one representative from Kentucky Power, Jimmy Keeton, was present at these meetings. Attachments 7.1 and 7.2 provide copies of email correspondence showing the participation of Mr. Keeton in the email list for this group.

The group convened by Senator McGarvey was unable to reach consensus on legislation to revise Kentucky’s net metering statute. In 2017 utilities and their allies began to lobby for legislation to change net metering without the support of solar advocates or Kentucky’s solar industry. This bill was resisted by solar advocates and failed to pass. This process was repeated in 2018, when the utilities’ bill failed to pass again, but then in 2019 the utilities’ bill to change net metering, SB100, passed and was signed into law. I was involved in the efforts to oppose these bills and spent time at committee hearings and other meetings at the Capital. It was my observation that all of the regulated electric utilities, including KPC, were working together to pass these bills. Solar advocates had been very clear for many years where we stood on issues related to net metering and that we believed the proposed bills would severely undermine Kentucky’s solar industry and customer access to solar energy. To my knowledge KPC never expressed

opposition to the anti-net metering bills that were proposed, never spoke out against the passage of these bills, and never reached out to solar advocates to offer support opposing these bills. I therefore concluded that KPC supported the legislation. KPC's comments before the Commission in the Net Metering Administrative Hearing (2019-00256) in November 2019 reinforces the conclusion that KPC supported passage of SB100.

Data from the Kentucky Legislative Ethics Commission on Lobbying Expenses by Employers (see Attachment 7.3) shows that KPC's lobbying expenses totaled \$179,481.63 from September 1, 2015 through April 30, 2019. This spans the time period from a meeting of Senator McGarvey's working group at which Karl Rabago presented expert testimony concerning the cost-benefit analysis of net metering, to the month that SB100 was passed into law. In the year leading up to the passage of SB100, KPC spent \$44,485.02 lobbying the Kentucky legislature. Another report from the Legislative Ethics Commission lists 31 expenditures by KPC for "Receptions, Meetings, and Events" from September 2015 through April 2019, with persons invited including General Assembly Members, House of Representatives Members, Senate Members, and LRC staff.

An article in the Courier Journal (February 25, 2019, see Attachment 7.4) stated: "Four big utility interests pumped \$327,050 into the political committees of legislative candidates and the political parties during the 2018 election cycle. That compares with the \$6,500 contributed by the tiny political action committee of Kentucky's solar industry. A Courier Journal review of campaign contributions shows a vast discrepancy in the amount of political contributions coming from the two sides that are clashing over a bill that would reduce credits utilities pay to customers who generate power with solar panels on their homes and businesses. The analysis shows 90 percent of the utility contributions went to political committees of Republicans, who hold majorities in the Kentucky House and Senate. Democrats got 10 percent of the utility PAC contributions.

" "In our current system, contributions are part of the way to help you discuss your issues with the politicians ... to help them understand your positions," said Melissa McHenry, spokeswoman for the Columbus, Ohio-based American Electric Power. "... It's a question of communicating with politicians and having access to share our viewpoint." ...

"The Courier Journal's review of political contributions in the Kentucky Registry of Election Finance's online database covering roughly the two-year period since the November 2016 election shows:

“American Electric Power’s PAC made 36 contributions totaling \$59,500 to legislative candidates, caucuses and political parties during the cycle. But the corporation itself also gave \$25,000 last October to Kentucky’s main Republican super PAC (Kentuckians for Strong Leadership), which was raising big contributions at the time for independent advertising supporting Republicans in closely contested House races. That brings the total to \$84,500. Of that total, \$83,750 went to Republicans, and \$750 to Democrats.”

American Electric Power is the parent company of KPC.

An editorial in the Lexington Herald Leader (April 8, 2018, Attachment 7.5) commented on the large sums being spent by utilities on lobbying to pass anti-net metering legislation. “Their campaign is on track to break state records for spending on lobbying and advertising to influence lawmakers. (And that doesn’t even include campaign contributions.)” The headline of the February 2018 Ethics Reporter newsletter from the Kentucky Legislative Ethics Commission stated, “Cigarette tax, solar policy drive lobbying spending.” (See Attachment 7.6)

Witness: Andrew McDonald

**KPC DR JI 8.** Refer to the testimony of Mr. McDonald at page 7 and Attachment 1.

- a. Confirm that Mr. McDonald did not author Attachment 1.
- b. If your response to subpart (a) is anything other than an unqualified confirmation, please explain Mr. McDonald’s involvement in the preparation of Attachment 1.
- c. Confirm that Karl Rabago has not filed direct testimony in this proceeding and will not be offered by Joint Intervenors as a witness at the hearing of this case.
- e. Confirm that Mr. McDonald’s testimony offers Attachment 1 for the truth of the matter asserted in Attachment 1.

**KPC DR JI RESPONSE 8:**

a. I did not author attachment 1, which is the testimony of Mr. Karl R. Rabago to the PSC in Case number 2019-00256.

b. See response to question 8.a.

c. Karl Rabago has not filed direct testimony in this proceeding and will not be offered by Joint Intervenors as a witness at the hearing of this case. By Order of the Commission in Case No. 2019-00256, “the record of [that] proceeding [is] incorporated by reference into any ratemaking proceedings initiated by retail electric utilities pursuant to the Net Metering Act.” This is such a proceeding.

d. There was no question 8.d. in the Data Request.

e. I confirm that my testimony offered Attachment 1 for the truth of the matter asserted in Attachment 1.

Witness: Andrew McDonald

KPC DR JI 9. Refer to Table 1- Potential Financial Impacts of Net Metering on KPC's Residential Ratepayers for Current Test Year (April 2019 to March 2020), *Assuming Distributed Solar Has No Value Beyond KPC's Avoided Cost Rate* on page 8 of Mr. McDonald's testimony. Please provide the study and all workpapers supporting that table in Microsoft Excel working format.

**KPC DR JI 9 RESPONSE:**

Please see Attachment 6.1.

Witness: Andrew McDonald

KPC DR JI 10. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of James Owen in electronic format, with formulas intact and visible, and no pasted values.

**KPC DR JI 10 RESPONSE:**

See: Owen Workpaper 1.xlsx

Witness: James Owen

KPC DR JI 11. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Owen. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

**KPC DR JI 11 RESPONSE:**

See: Owen Workpaper 1.xlsx

Witness: James Owen

KPC DR JI 12. Refer to the testimony of James Owen, page 19, lines 11 through 14. Please identify and provide any legal authority, documents, studies, or other material reviewed or relied on by Mr. Owen to support his claim that an ROE even one dollar more than the *minimum* amount which is required to provide a fair opportunity for a utility to earn a reasonable return on investment is an unjust and unreasonable ROE.

**KPC DR JI 12 RESPONSE:**

See: footnotes in Owen testimony.

Witness: James Owen

KPC DR JI 13. Please refer to the testimony of James Owen beginning on page 19, line 18 and continuing through page 21. There, Mr. Owen's cites a report from S&P Global in support of his claim that the Company's requested ROE is too high.

(a) Explain whether Mr. Owen conducted any independent study, analysis, or calculation to support his recommendation on what constitutes a reasonable return on equity for the Company.

(b) If the answer to (a) is affirmative, please provide all workpapers, source documents, and electronic spreadsheets used to support Mr. Owen's recommended return on equity. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(c) Please confirm that Mr. Owen is not the author of the cited S&P Global report and was not involved in the creation of that report.

**KPC DR JI 13 RESPONSE:**

(a) Mr. Owens' analysis on ROE is contained in his testimony at pages 16 through 24.

(b) See attached Electric ROE Authorizations Drift Lower In H1'20 As Virus Worries Continue available at:

<https://www.spglobal.com/marketintelligence/en/news-insights/research/electric-roe-authorizations-drift-lower-in-h1-20-as-virus-worries-continue>



(c) Confirm

Witness: James Owen

KPC DR JI 14. Refer to testimony of James Owen, page 25, lines 8 through 14. Please provide all facts, including any documents, studies, or reports, that support Mr. Owen's claim that raising the customer charge to \$17.50 would disincentivize residential customers to conserve energy or make energy efficiency investments.

**KPC DR JI 14 RESPONSE:**

The detrimental impacts of higher service charges on low-income, low-usage, and customer-generator customers and on energy efficiency are extremely well-documented and widely confirmed across the country. Therefore, it is impossible to provide all of the supporting studies of such a self-evident conclusion. Mr. Owen's conclusion rests as much on simple deductive reasoning as it does on supporting studies and literature. However, we have included citations and links to several instructive papers, studies, and reports below.

1. Shannon Baker-Branstetter, "Caught in a Fix: The Problem with Fixed Charges for Electricity." Consumer Reports, February, 10 2016. Available at: <https://advocacy.consumerreports.org/research/caught-in-a-fix-the-problem-with-fixed-charges-for-electricity/>
2. "Utility Rate Design: High Utility Fixed Charges Harm Low-Income, Elders and Households of Color." National Consumer Law Center. Summary of research and analysis available at: <https://www.nclc.org/issues/energy-utilities-a-communications/utility-rate-design.html>
3. Caroline Grolin, The Greenlink Group, "A Troubling Trend in Rate Design: Proposed Rate Design Alternatives to Harmful Fixed Charges." Southern Environmental Law Center, December 2015. Available at: [https://www.southernenvironment.org/uploads/news-feed/A\\_Troubling\\_Trend\\_in\\_Rate\\_Design.pdf](https://www.southernenvironment.org/uploads/news-feed/A_Troubling_Trend_in_Rate_Design.pdf)
4. "Public Comment of John Howat, National Consumer Law Center on Behalf of Wisconsin Community Action Program Association." Public Service Commission of Wisconsin, File No. 3270-UR-120, October 3, 2014. Available at: <https://apps.psc.wi.gov/ERF/ERFsearch/content/searchResult.aspx?UTIL=3270&CASE=UR&SEQ=120&START=none&END=none&TYPE=none&SERVICE=none&KEY=none&NON=N>

These are provided in addition to the documents cited in testimony:

5. Whited, M. et al. (2016). Caught in a fix. Synapse Energy Economics. Available at: <https://advocacy.consumerreports.org/wp-content/uploads/2016/02/Caught-in-a-Fix-FINAL-REPORT-20160208-2.pdf>
6. Vote Solar, “Guidance for utility commissions on Time of Use rates: A shared perspective from consumer and clean energy advocates”, Electricity Rate Design Review Paper No.2, July 15, 2017, *available at* <https://votesolar.org/files/9515/0039/8998/TOU-Paper-7.17.17.pdf>
7. Lazar, J. (2016) “Use great caution in design of residential demand charge rates”. Regulatory Assistance Project, *available at* <https://www.raonline.org/wp-content/uploads/2016/05/lazar-demandcharges-ngejournal-2015-dec.pdf>
8. Minnesota Public Utilities Commission, In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota; Findings of Fact, Conclusions, and Order; Docket No. E-002/GR- 13-868, May 8, 2015, p. 88.
9. Rate Design Direct Testimony by Allison, A., on behalf of Sierra Club. Public Service Commission of the State of Missouri File No. ER-2019-0335, In the Matter of Union Electric Company, d/b/a Ameren Missouri’s Tariff to Decrease Its Revenues for Electric Service, December 18, 2019, p.11.
10. Connecticut Public Utilities Regulatory Commission. Docket No. 17-10-46, Decision In the Matter of the Connecticut Light and Power Company d/b/a Eversource Energy (April 18, 2018).
11. State of New York Public Service Commission. Case No. 17-E-0459, Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plan In the Matter of Central Hudson Gas & Electric Corporation (June 14, 2018).
12. Statement in Support of Joint Proposal by Howe, C., on behalf of Acadia Center. New York Public Service Commission. Case No. 17-E-0459, In the Matter of the Central Hudson Gas & Electric Corporation (May 2, 2018).

Witness: James Owen

KPC DR JI 15. Refer to the Direct Testimony of James Owen, page 32, lines 14 through 21. Mr. Owen states that the Company did not discuss alleged system-wide benefits or savings experienced during solar as part request to establish \$.03659/kWh as the avoided-cost rate in the Company’s proposed N.M.S. II tariff but offers no rate design recommendations addressing those alleged benefits or savings. Confirm that the Joint Intervenors are not making any recommendations with respect to this aspect of the avoided-cost rate design.

**KPC DR JI 15 RESPONSE:**

The Joint Intervenors do not confirm, but rather dispute, that they are not making any recommendations with respect to rate design. In fact, on pg. 32 lines 8-10 of Mr. Owen’s Direct Testimony, the Joint Intervenors specifically state their recommendation: “Additionally, the Commission should hold utilities to their full burden of proof and require them to produce substantial evidence for all of the costs and benefits that each solar system contributes to the utility’s system.” In recommending that the Commission hold Kentucky Power to its burden of proof and require the production of evidence for the costs and benefits of solar, the Joint Intervenors provide a list of commonly studied benefits and savings due to solar, which many so-called Value-of-Solar studies have examined in jurisdictions across the country. The system-wide benefits or savings experienced due to solar may include: reduced transmission and distribution losses; reduced congestion at stressed nodes and distribution points along the grid; peak load reductions or shifts; reduced costs along the fuel supply line; reduced environmental liabilities and/or environmental compliance costs; avoided generation capacity investments; reduced grid support services; improved grid resiliency; and other system-wide benefits or savings that result from the generation of net-metered solar resources.

Witness: James Owen

KPC DR JI 16. Explain whether Mr. Owen conducted any study, calculation or analysis related to the reasonableness of the Company’s proposed N.M.S. II avoided rate of \$.03659/kWh. If he has, please provide a copy of the bill impact analysis and all workpapers and source documents in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

**KPC DR JI 16 RESPONSE:** Mr. Owen did not conduct any study, calculation or analysis related to the Company’s proposed N.M.S. II avoided rate in this case. Rather, Mr. Owen noted that the Company itself seems to not have conducted such any study, calculation, or analysis of all of the costs and benefits of net-metered solar in developing its proposed N.M.S. II avoided rate, and thus has not met its necessary burden in this case.

Witness: James Owen

KPC DR JI 17. Starting on page 44 of the Direct Testimony of James Owen, Mr. Owen discusses the “Pay As You Save” or “PAYS” program. Mr. Owen states that, under this program, the utility will bear the up-front cost of installed energy saving measures and then recover the costs of the energy savings measures on the customer’s electric bills.

(a) Explain whether Mr. Owen has conducted any analysis or calculation of the cost to implement a PAYS program similar to the one he recommends the Company be required to develop.

(b) Explain whether Mr. Owen conducted any bill impact analysis regarding his recommendation that the Company establish a PAYS program.

(c) If the response to (a) and/or (b) is affirmative, provide a copy of the cost or bill impact analysis.

(d) Further, if the response to (a) and/or (b) is affirmative, provide all workpapers and source documents in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

**KPC DR JI 17 RESPONSE:**

(a) Mr. Owen did not conduct any such analysis for this case.

(b) Mr. Owen did not conduct any such analysis for this case.

(c) N/A

(d) N/A

Witness: James Owen

KPC DR JI 18. Confirm that Mr. Owen authored Joint Intervenors’ proposed “Pay As You Save On-Bill Program” tariff sheet, Schedule JO-2. If your response to the foregoing request is anything other than an unqualified confirmation, please identify the author or entity that created Schedule JO-2.

**KPC DR JI 18 RESPONSE:**

Confirm. This exemplar tariff sheet was developed based on tariffs for PAYS(R) programs in Missouri and Arkansas.

Witness: James Owen

KPC DR JI 19. To the extent not provided in response to data request 5 and data request 6 above, please provide the following for each of the “manual calculations” identified in Mr. Owen’s testimony.

(a) a copy of each source document or reference used; and

(b) the referenced “manual calculation.” The manual calculation, including all intermediate steps, should be provided in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used.

**KPC DR JI 19 RESPONSE:**

See: Owen Workpaper 1.xlsx

Witness: James Owen

KPC DR JI 20. Please provide in electronic format, with formulas intact and visible, and no pasted values the calculation of “the year 5 impact” of “approximately \$1.73 per bill for RS customers” described at lines of 13-14 of page 57 of Mr. Owens’ testimony.

**KPC DR JI 20 RESPONSE:**

See: Owen Workpaper 1.xlsx

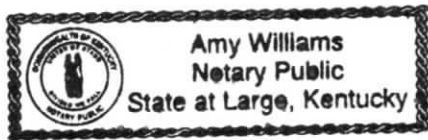
Witness: James Owen


**Verification**

The undersigned, Josh Bills, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable inquiry.

  
\_\_\_\_\_  
Josh Bills

Subscribed and sworn to before me by Josh Bills this 2nd day of November 2020.

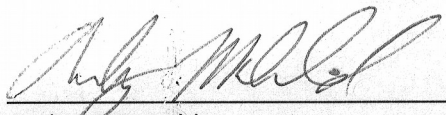


  
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Notary Public      Notary ID: KYNP9940

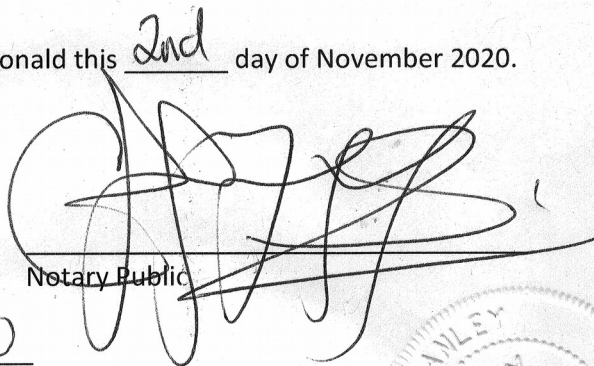
My commission expires: 6-29-2024

**Verification**

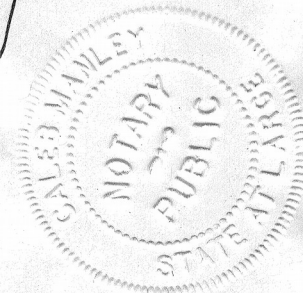
The undersigned, Andy McDonald, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable inquiry.

  
\_\_\_\_\_  
Andy McDonald

Subscribed and sworn to before me by Andy McDonald this 2nd day of November 2020.

  
\_\_\_\_\_  
Notary Public

My commission expires: 1-10-2020

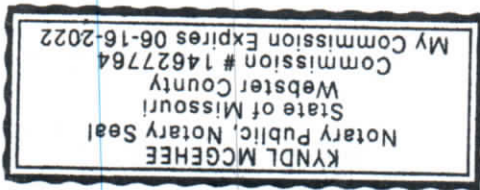


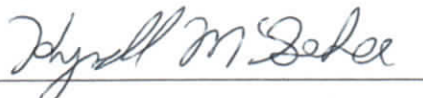
**Verification**

The undersigned, James Owen, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable

  
James Owen

Subscribed and sworn to before me by James Owen this 2<sup>nd</sup> day of November 2020.



  
Notary Public