

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

In the Matter of:

Electronic Application Of Kentucky Power )  
Company For A Certificate Of Public Convenience )  
And Necessity To Construct A 138 kV )  
Transmission Line And Associated Facilities )  
In Breathitt, Floyd, And Knott Counties, Kentucky )  
(Garrett Area Improvements 138 kV Transmission )  
Project) )

Case No. 2021-00346

**REBUTTAL TESTIMONY OF**

**GEORGE T. REESE  
GAI CONSULTANTS, INC.**

**ON BEHALF OF KENTUCKY POWER COMPANY**

**REBUTTAL TESTIMONY OF  
GEORGE T. REESE GAI CONSULTANTS, INC.  
ON BEHALF OF KENTUCKY POWER COMPANY  
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**CASE NO. 2021-00346**

**TESTIMONY INDEX**

<b><u>SECTION</u></b>	<b><u>PAGE</u></b>
I. INTRODUCTION .....	1
II. BACKGROUND AND PURPOSE OF REBUTTAL TESTIMONY .....	1
III. ALTERNATIVE ROUTES PROPOSED BY MR. ALLEN.....	1
IV. INDIANA BAT .....	2
V. DANIEL BOONE ROCK.....	6
VI. GAS LINE .....	8
VII. FISH PONDS .....	9
VIII. HAYS BRANCH 138 KV SUBSTATION .....	11

**REBUTTAL TESTIMONY OF**

**GEORGE T. REESE  
GAI CONSULTANTS, INC.**

**ON BEHALF OF KENTUCKY POWER COMPANY  
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

**CASE NO. 2021-00346**

**I. INTRODUCTION**

1 **Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

2 A. My name is George T. Reese. I am employed by GAI Consultants, Inc. (“GAI”), 385 East  
3 Waterfront Drive, Homestead, PA 15120, as Vice President, Business Sector Manager for  
4 Power Delivery – Environmental.

5 **II. BACKGROUND AND PURPOSE OF REBUTTAL TESTIMONY**

6 **Q. ARE YOU THE SAME GEORGE T. REESE WHO OFFERED DIRECT**  
7 **TESTIMONY IN THIS PROCEEDING?**

8 A. Yes. My testimony was offered in support of the Company’s application for a certificate  
9 of public convenience and necessity to construct, own, and maintain certain components  
10 of the Garrett Area Improvements 138 kV Transmission Project (“Project”). I also  
11 provided responses to certain of the Commission’s November 29, 2021 and December 15,  
12 2021 data requests.

**III. ALTERNATIVE ROUTES PROPOSED BY MR. ALLEN**

13 **Q. PLEASE ADDRESS MR. ALLEN’S PROPOSED ALTERNATIVE ROUTES.**

1 A. Mr. Allen’s January 18, 2022 submission appears to present three alternative routing  
 2 locations. Route A as labelled by Mr. Allen appears to be coincident with or in close  
 3 proximity to the Company’s Proposed Route.

4 Route B as labelled by Mr. Allen was not among the alternatives developed by the  
 5 Company. This routing appears to be longer and would affect more of the property of  
 6 both Mr. Allen and others, would require more angles which would increase cost, and be  
 7 located on less suitable topography than the Proposed Route. The topography is less  
 8 suitable due to the proposed centerline’s location on a narrow ridge and side slopes that  
 9 present constructability issues.

10 The third (unlabeled) alternative also was not among the alternatives developed  
 11 by the Company. It would also appear to be slightly longer and would affect slightly  
 12 more of the property of both Mr. Allen and others, would require more angles which  
 13 would increase cost, and be located on less suitable topography than the Proposed Route.  
 14 The topography is less suitable due to the proposed line’s location on a narrow ridge and  
 15 side slopes that present constructability issues. It also appears to place a communications  
 16 facility in or adjacent to the right-of-way, and would be located closer to the residences  
 17 on Mr. Allen’s property than the Proposed Route.

**IV. INDIANA BAT**

18 **Q. PLEASE DESCRIBE THE STEPS THE COMPANY TAKES TO IDENTIFY THE**  
 19 **PRESENCE OF INDIANA BATS ALONG ANY TRANSMISSION LINE RIGHT-**  
 20 **OF-WAY IT PROPOSES TO BUILD.**

21 A. The Company’s standard siting and permitting processes include efforts to identify the

1 presence of endangered and threatened species. As part of the siting efforts, a review of  
2 the project study area is conducted utilizing the U.S. Fish and Wildlife Service (USFWS)  
3 Information for Planning and Consultation (IPAC) online tool to identify the potential for  
4 occurrence of endangered and threatened species in the vicinity of the project, including  
5 the Indiana bat. In addition, known bat species occurrence records provided by the  
6 USFWS are reviewed for the project area, if available. The Company also coordinates  
7 with the Kentucky Department of Fish and Wildlife Resources (KDFWR) and the  
8 Kentucky Office of Nature Preserves, as applicable, for information that they may have  
9 concerning species occurrences. This information is utilized to identify potential species  
10 issues associated with the project alternatives.

11 Following approval of a proposed route, the Company will conduct additional  
12 coordination with the USFWS and state regulatory agencies, as applicable, as part of the  
13 permitting effort for the project to determine the need for additional investigations or  
14 mitigation requirements.

15 **Q. WHAT IS THE STATUS OF THOSE EFFORTS IN CONNECTION WITH THE**  
16 **PROPOSED GARRETT PROJECT RIGHT-OF-WAY?**

17 A. The Company has conducted a review of the USFWS IPAC and has coordinated with the  
18 KDFWR and the Kentucky Office of Nature Preserves concerning species and resources  
19 of concern that may occur in the project study area. Based on this review, a number of  
20 species of concern, including the Indiana bat, were identified as potentially occurring in  
21 the project study area. In addition, bat portal studies were conducted relative to the  
22 expansion of the Garrett Substation in 2021 to accommodate its construction schedule.  
23 After a proposed route is approved, the Company will initiate consultation with USFWS

1 and the KDFWR and conduct additional investigations, if necessary.

2 **Q. WHAT IS THE STATUS OF THOSE EFFORTS IN CONNECTION WITH MR.**  
3 **ALLEN'S TWO TRACTS?**

4 A. Since a proposed route has not been approved, no threatened and endangered species  
5 field studies have been performed to date in association with Mr. Allen's two tracts  
6 (Parcel 5 and Parcel 6).

7 **Q. IS THE COMPANY AWARE OF ANY INDIANA BATS LIVING OR**  
8 **HIBERNATING ON MR. ALLEN'S PROPERTY?**

9 A. No. Based on available information from the USFWS, KDFWR, and the Kentucky  
10 Office of Nature Preserves, there are no known Indiana bat occurrences on Mr. Allen's  
11 property (Parcel 5 and Parcel 6).

12 **Q. IF INDIANA BATS ARE DISCOVERED ON MR. ALLEN'S PROPERTY DOES**  
13 **THIS MEAN THE TRANSMISSION LINE CANNOT BE BUILT?**

14 A. No. If Indiana bats are documented during field studies along the Project, the Company  
15 would consult with USFWS in order to avoid and minimize effects to the species.  
16 Avoidance and minimization measures would be based on the specific data resulting from  
17 the bat studies. Project construction can normally proceed if sufficient avoidance and  
18 minimization measures are met.

19 **Q. WHAT STEPS WILL THE COMPANY TAKE IF INDIANA BATS ARE**  
20 **DISCOVERED ON MR. ALLEN'S PROPERTY?**

21 A. If Indiana bats are discovered on or in the vicinity of Mr. Allen's property, the Company  
22 will notify the USFWS and the KDFWR of the capture(s). If bats are captured during  
23 summer mist netting surveys, the captured bats are typically radio-tracked to determine

1 detailed habitat use of the surrounding landscape. If bats are documented as using any  
 2 underground features (e.g., caves or mines) during fall or spring, USFWS and KDFWR  
 3 will be consulted to determine the most appropriate steps to avoid and minimize effects to  
 4 that particular habitat.

5 **Q. MR. ALLEN FILED WITH THE COMMISSION WHAT APPEARS TO BE AN**  
 6 **UNSWORN COPY OF AN INDIANA DEPARTMENT OF NATURAL**  
 7 **RESOURCES WEBPAGE. DOES THIS WEBSITE SUPPORT MR. ALLEN'S**  
 8 **CLAIM THAT INDIANA BATS LIVE ON HIS PROPERTY?**

9 A. No. The information contained on the Indiana Department of Natural Resources website  
 10 includes history of the species listing, general background of ecology of the species  
 11 (including its propensity to hibernate in caves), and general information regarding how  
 12 all bats are beneficial to the environment. No specific geographic information is  
 13 provided to support any evidence that bats have been documented on Mr. Allen's  
 14 property.

15 **Q. DID KENTUCKY POWER REQUEST THAT MR. ALLEN PROVIDE**  
 16 **EVIDENCE SUPPORTING HIS CLAIM THAT INDIANA BATS LIVE ON HIS**  
 17 **PROPERTY?**

18 A. Yes. To date he has not complied.

19 **Q. DID KENTUCKY POWER ALSO REQUEST MR. ALLEN MARK THE**  
 20 **LOCATION ON HIS PROPERTY OF THE CLAIMED INDIANA BAT**  
 21 **HABITAT?**

22 A. Yes. To date he has not complied.

**V. DANIEL BOONE ROCK**

1 **Q. WHAT STEPS HAS THE COMPANY AND ITS CONTRACTORS TAKEN TO**  
 2 **IDENTIFY HISTORICAL OR ARCHEOLOGICAL MATERIAL IN THE**  
 3 **TRANSMISSION LINE RIGHT-OF-WAY?**

4 A. As part of the siting study, the Company conducted a review of previously recorded  
 5 resources utilizing digital files of architectural and historical resources from the Kentucky  
 6 Heritage Council, as well as digital files of archaeologically significant resources from  
 7 the Kentucky Office of State Archaeology.

8 **Q. DID YOUR SEARCH INCLUDE THE KENTUCKY HISTORICAL SOCIETY,**  
 9 **THE MOREHEAD STATE ARCHIVES, AND THE FLOYD COUNTY TIMES**  
 10 **ARCHIVES?**

11 A. Yes. Following Mr. Allen’s initial statement regarding the presence of the inscribed rock  
 12 located on his property, on-line resources at the Kentucky Historical Society and the  
 13 Morehead State University Archives (including the Floyd County Times) were examined.

14 **Q. DID YOU DISCOVER ANY RECORD OR OTHER EVIDENCE OF THE**  
 15 **EXISTENCE OF A ROCK INSCRIBED BY DANIEL BOONE ON MR. ALLEN’S**  
 16 **PROPERTY?**

17 A. The Company was able to find some reference in two resources to an inscribed rock  
 18 located in Floyd County. According to the book “Kentucky’s Last Frontier” (Henry P.  
 19 Scalf, *Kentucky’s Last Frontier*, The Overmountain Press: Johnson City, Tennessee,  
 20 1966, pg. 53) contained in the Kentucky Historical Society library, a record of a rock  
 21 with the inscription “DB 1775” is noted to be on “the old Allen farm on the Gosling Fork  
 22 of Goose Creek on Beaver Creek in Floyd County, high up on a mountain”. An exact



1 location of this rock was not indicated in the book.

2 Further, a reference to an inscribed rock is contained in a collection of the works  
3 of Henry P. Scalf that were published in the Floyd County Times, which is kept at the  
4 Morehead State University archives. (Henry P. Scalf, “Boone May Have Carved His  
5 Initials in Year 1775 On A Goose Creek Rock,” *Floyd County Times*, 1954). An exact  
6 location of this rock was not indicated in this publication.

7 Such a feature as described by Mr. Allen is not identified in the online databases  
8 of the Kentucky Heritage Council or the Kentucky Office of State Archaeology, and no  
9 other reference to a Daniel Boone Rock in Floyd County was found in the indices at these  
10 repositories.

11 Due to the lack of information in the resources reviewed by the Company  
12 regarding the description and specific location of the rock, the Company could not  
13 definitively confirm that the rock described Mr. Allen was, in fact, a genuine historical  
14 artifact.

15 **Q. DID THE COMPANY REQUEST MR. ALLEN TO PRODUCE THE EVIDENCE**  
16 **AUTHENTICATING HIS CLAIMED DANIEL BOONE ROCK AND ITS**  
17 **LOCATION WITH RESPECT TO THE PROPOSED RIGHT-OF-WAY?**

18 A. Yes. To date he has not complied.

19 **Q. ARE YOU AWARE OF ROCKS INSCRIBED WITH DANIEL BOONE’S NAME**  
20 **AND A DATE THAT ARE NOT AUTHENTIC?**

21 A. Yes, one is documented in Muhlenberg County. It has been noted that Boone carvings  
22 were common counterfeits in Kentucky since the eighteenth century as promoters of  
23 tourism (Berry Craig, “Muhlenberg’s ‘Boone Rock’ likely not carved by Daniel Boone,”

1 *Messenger-Inquirer*, 11 November 2006).

2 **Q. HAS MR. ALLEN ILLUSTRATED THE LOCATION OF THE CLAIMED**  
 3 **DANIEL BOONE ROCK AS REQUESTED BY THE COMPANY?**

4 A. No. To date he has not complied.

5 **Q. WHAT STEPS WOULD THE COMPANY TAKE IF IT DETERMINES THAT AN**  
 6 **AUTHENTIC ROCK INSCRIBED BY DANIEL BOONE EXISTS ON HIS**  
 7 **PROPERTY?**

8 A. Even in the absence of Mr. Allen’s concern, a Phase I cultural resources survey will be  
 9 conducted and coordinated with the Kentucky Heritage Council and the Kentucky Office  
 10 of State Archaeology (collectively serving as the State Historic Preservation Office  
 11 (SHPO)) during later phases of Project development. If the inscribed rock is located  
 12 within the area of potential effect for the Project, it will be documented and the findings  
 13 submitted to the SHPO for review and comment. If an inscribed rock is determined  
 14 significant by the SHPO, an avoidance plan would be implemented.

**VI. GAS LINE**

15 **Q. PLEASE DESCRIBE FOR THE COMMISSION THE STEPS THE COMPANY**  
 16 **TAKES TO LOCATE AND MAP THE EXISTENCE OF PIPELINES AND**  
 17 **OTHER UTILITY FACILITIES IN ITS PROPOSED RIGHT-OF-WAY.**

18 A. The National Pipeline Mapping System, a nationwide pipeline database, was utilized to  
 19 identify potential pipeline locations as part of the Siting Study. In addition, aerial  
 20 photography was examined for the evidence indicating the presence of major pipelines.  
 21 Furthermore, Company representatives encouraged property owners to disclose the  
 22 location of utilities on their properties during the public outreach phase of the project.

1 Coordination with utility companies, review of property easement records as available,  
 2 and on-site investigations are conducted during later phases of Project development to  
 3 locate and identify both above ground and buried utilities, including pipelines.

4 **Q. DID THE COMPANY’S EFFORTS IDENTIFY THE DIVERSIFIED GAS CO.  
 5 GAS PIPELINE MR. ALLEN DESCRIBES?**

6 A. No, the published data and review of aerial photography do not identify a gas pipeline on  
 7 Mr. Allen’s property.

8 **Q. IS IT UNCOMMON THAT A NATURAL GAS LINE WOULD NOT BE  
 9 DISCOVERED USING THE METHODS YOU DESCRIBE?**

10 A. No, online databases are limited in scope. As noted previously, coordination with utility  
 11 companies and on-site investigations are conducted during later phases of Project  
 12 development to locate and identify utilities.

13 **Q. DID THE COMPANY REQUEST MR. ALLEN TO PLOT THE LOCATION OF  
 14 THE DIVERSIFIED GAS CO. PIPELINE ON HIS PROPERTY?**

15 A. Yes. To date he has not complied.

16 **Q. IF THE COMPANY DETERMINES THE PIPELINE IS ON MR. ALLEN’S  
 17 PROPERTY WHAT STEPS, IF ANY, WOULD IT TAKE?**

18 A. The Company will coordinate with the pipeline and surface owners to discuss appropriate  
 19 avoidance measures. The Company can move structures and the centerline within the  
 20 filing corridor to avoid paralleling a pipeline within the right-of-way. The Project will be  
 21 designed so that no structures are placed within 50 feet of a pipeline.

**VII. FISH PONDS**

22 **Q. IS THE COMPANY AWARE OF THE TWO PONDS ON MR. ALLEN’S**

1           **PROPERTY?**

2    A.     The Company has noted the presence of two ponds on aerial photography.

3    **Q.     WHERE ARE THE PONDS IN RELATION TO PROPOSED TRANSMISSION**  
 4           **LINE AND RIGHT-OF-WAY?**

5    A.     The two ponds are located approximately 250 feet north (the southernmost pond) and  
 6           1,000 feet north (the northernmost pond) of Kentucky Route 680. The southernmost  
 7           pond is located east of the right-of-way, and at its closest point is approximately 665 feet  
 8           from the proposed route centerline and 615 feet from the edge of the right-of-way. The  
 9           northernmost pond is located southeast of the right-of-way. At its closest proximity, it is  
 10          approximately 820 feet from the centerline and 770 feet from the edge of the right-of-  
 11          way.

12   **Q.     WHAT STEPS WOULD THE COMPANY TAKE TO PROTECT MR. ALLEN’S**  
 13          **PONDS FROM ANY RUN-OFF AND SILT RESULTING FROM THE**  
 14          **CONSTRUCTION OR OPERATION OF ITS TRANSMISSION LINE AND**  
 15          **RIGHT-OF-WAY?**

16   A.     Erosion and sedimentation control measures are available and will be implemented to  
 17          avoid impacts to the ponds and other surface waters. The Company is required to obtain  
 18          a construction stormwater permit from the Kentucky Department of Environmental  
 19          Protection, Division of Water, which will require that a Kentucky Pollutant Discharge  
 20          Elimination System (KPDES) Stormwater Pollution Prevention Plan (SWPPP) be  
 21          developed for the Project prior to approval.

22   **Q.     MR. ALLEN ALSO EXPRESSED CONCERN ABOUT THE COMPANY’S USE**  
 23          **OF HERBICIDES IN CONNECTION WITH ITS TRANSMISSION LINE RIGHT-**

1 **OF-WAY VEGETATION MANAGEMENT EFFORTS. DOES THE COMPANY**  
2 **USE HERBICIDES IN CONNECTION WITH ITS TRANSMISSION LINE**  
3 **RIGHT-OF-WAY?**

4 A. The Company utilizes both mechanical and herbicide treatments to control vegetation  
5 within its rights-of-way. Herbicides help control the root systems of woody-stemmed  
6 vegetation. Licensed specialists use herbicides registered with the U.S. Environmental  
7 Protection Agency and the appropriate state regulatory agency.

8 **Q. WHAT EFFORTS WOULD THE COMPANY UNDERTAKE TO PROTECT MR.**  
9 **ALLEN’S PONDS FROM RUN-OFF OF HERBICIDES USED IN THE**  
10 **COMPANY’S TRANSMISSION LINE RIGHT-OF-WAY?**

11 A. The Company conducts herbicide maintenance activities to avoid impact to adjacent  
12 waterways, including the incorporation of buffer areas to provide separation from features  
13 such as ponds where appropriate. However, the Company can agree to designate the  
14 proposed transmission line that crosses Mr. Allen’s parcels as “no spray” zones if  
15 requested.

**VIII. HAYS BRANCH 138 KV SUBSTATION**

16 **Q. MR. ALLEN ON JANUARY 4, 2022 FILED TWO PHOTOGRAPHS HE**  
17 **DESCRIBED AS PORTRAYING THE HAYS BRANCH 138 KV SUBSTATION.**  
18 **DO THE PHOTOGRAPHS PORTRAY THE HAYS BRANCH 138 KV**  
19 **SUBSTATION?**

20 A. No. The two photographs appear to show several distribution transformers located on a  
21 hill. The Hays Branch 138 kV Substation by contrast is located next to the MarkWest

1 Energy Partners facility near the Right Fork of the Beaver Creek.

2 **Q. COMPANY WITNESS KOEHLER TESTIFIED THAT THE HAYS BRANCH 138**  
3 **KV SUBSTATION CANNOT BE EXPANDED AS A SUBSTITUTE FOR**  
4 **CONSTRUCTING THE PROPOSED EASTERN 138 KV SUBSTATION.**  
5 **ASSUME FOR PURPOSES OF THIS QUESTION ONLY THAT THE HAYS**  
6 **BRANCH SUBSTATION COULD BE EXPANDED, THEREBY ELIMINATING**  
7 **THE NEED TO CONSTRUCT THE PROPOSED EASTERN 138 KV**  
8 **SUBSTATION. WOULD ELIMINATION OF THE PROPOSED EASTERN 138**  
9 **KV SUBSTATION ELIMINATE THE NEED TO PLACE THE PROPOSED**  
10 **TRANSMISSION LINE ON MR. ALLEN’S PROPERTY?**

11 A. No. In that situation, the proposed transmission line would be needed to connect the  
12 Garrett Substation and Hays Branch Substation. Because the Hays Branch Substation is  
13 in close proximity (approximately 0.6 mile) to the proposed Eastern Substation site, the  
14 proposed route would continue to represent the optimal location for the transmission line  
15 in the vicinity of Mr. Allen’s property.

16 **Q. YOU TESTIFIED THAT REQUIRED CUSTOMER OUTAGES CONSTRAINED**  
17 **THE COMPANY’S ABILITY TO EXPAND THE HAYS BRANCH 138 KV**  
18 **SUBSTATION. PLEASE EXPLAIN WHAT YOU MEANT BY CUSTOMER**  
19 **OUTAGE CONSTRAINTS.**

20 A. The Hays Branch 138 kV substation is a customer-owned substation that serves  
21 approximately 32 MW of load at MarkWest Hydrocarbon’s gas compressing operation.  
22 Buying and expanding the Hays Branch substation would result in a prolonged outage(s)  
23 to the customer during construction of the expanded substation as there is no other source

1 to pick up the load of this customer. The customer is unable to sustain a prolonged  
 2 outage.

3 **Q. COMPANY WITNESS KOEHLER ALSO INDICATED THAT THE**  
 4 **TOPOGRAPHY ADJACENT TO THE EXISTING HAYS BRANCH 138 KV**  
 5 **SUBSTATION LIMITED THE COMPANY’S ABILITY TO EXPAND THE**  
 6 **SUBSTATION. PLEASE PROVIDE MORE DETAIL ON THE TOPOGRAPHY**  
 7 **AND HOW IT LIMITS THE COMPANY’S ABILITY TO EXPAND THE**  
 8 **EXISTING HAYS BRANCH 138 KV SUBSTATION.**

9 A. The Hays Branch Substation is constrained by the MarkWest facility to the west and  
 10 north, by a hillside and the Right Fork Beaver Creek to the east, and by Right Fork  
 11 Beaver Creek to the south. The available space as constrained by these features is  
 12 insufficient to accommodate the required 138 kV facilities.

13 **Q. IS THE EXISTING HAYS BRANCH 138 KV SUBSTATION SITE SUBJECT TO**  
 14 **FLOODING?**

15 A. Yes. The Hays Branch Substation is located immediately adjacent to the Right Fork  
 16 Beaver Creek and is within the 100-year floodplain and in part lies within the floodway.  
 17 This makes the facility subject to damage and access limitations during flood events.

18 **Q. ARE THERE ANY OTHER REASONS THE PROPOSED EASTERN 138 KV**  
 19 **SUBSTATION SITE IS THE COST-EFFECTIVE ALTERNATIVE TO**  
 20 **EXPANDING THE EXISTING HAYS BRANCH 138 KV SUBSTATION?**

21 A. Yes, the proposed substation site will permit the Company to use the Eastern Substation  
 22 for a future 138/12kV distribution transformer along with 12 kV equipment to

1 accommodate system expansion for load growth and system reliability improvement in the  
2 area.

3 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

4 A. Yes.



VERIFICATION

The undersigned, George T. Reese, being duly sworn, deposes and says he is the Vice President, Business Sector Manager for Power Delivery – Environmental for GAI Consultants, Inc., that he has personal knowledge of the matters set forth in the forgoing testimony, and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

  
George T. Reese

STATE OF PENNSYLVANIA  
COUNTY OF ALLEGHENY

)  
) Case No. 2021-00346  
)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by  
George T. Reese, on 1/26/22.

  
Notary Public

Notary ID Number: 1185072

