

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY POWER
COMPANY FOR: (1) APPROVAL TO EXPAND ITS)
TARGETED ENERGY EFFICIENCY PROGRAM; (2))
APPROVAL OF A HOME ENERGY IMPROVEMENT)
PROGRAM AND A COMMERCIAL ENERGY SOLUTIONS)
PROGRAM; (3) AUTHORITY TO RECOVER COSTS AND)
NET LOST REVENUES, AND TO RECEIVE INCENTIVES)
ASSOCIATED WITH THE IMPLEMENTATION OF ITS)
DEMAND-SIDE MANAGEMENT/ENERGY EFFICIENCY)
PROGRAMS; (4) APPROVAL OF REVISED TARIFF)
D.S.M.C.; (5) ACCEPTANCE OF ITS ANNUAL DSM)
STATUS REPORT; AND (6) ALL OTHER REQUIRED)
APPROVALS AND RELIEF)

Case No. 2024-00115

**SUPPLEMENTAL DATA REQUESTS OF JOINT INTERVENORS MOUNTAIN
ASSOCIATION, KENTUCKIANS FOR THE COMMONWEALTH, APPALACHIAN
CITIZENS' LAW CENTER, AND KENTUCKY SOLAR ENERGY SOCIETY TO
KENTUCKY POWER COMPANY**

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Dated: July 22, 2024

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.

2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.

3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.

4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.

5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it and why it was so disposed.

6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.

7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.

10. Unless otherwise specified in each individual interrogatory or request, the terms “you,” “your,” “Kentucky Power Company,” “KPC,” or refer collectively to Kentucky Power Company, including any parent or affiliated companies, predecessors-in-interest, employees, authorized agents, outside consultants or contractors, or other representatives.

11. “Kentucky Power Company” or “KPC,” means Kentucky Power Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and any parent or affiliated companies (including but not limited to American Electric Power “AEP” and its affiliated entities.

12. “The Company[s]” means Kentucky Power Company.

13. “Joint Intervenors” means Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens’ Law Center, and Kentucky Solar Energy Society, who have been granted full joint intervention in this matter.

14. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.

15. “CAA” means Community Action Agency.

16. “DOE” means Department of Energy.

17. “DSM” means Demand-Side Management.

18. “EE” means Energy Efficiency.

19. “EISA” means Energy Independence and Security Act.

20. “EM&V” means Evaluation, Measurement, and Verification.

21. “GDS” means GDS Associates, Inc.

22. “HEA” means Home Energy Assistance.

23. “HEIP” means Home Energy Improvement Plan

24. “HVAC” means Heating, Ventilation, and Air Conditioning.

25. “IUI Programs” means Inclusive Utility Investment, Tariffed-on-Bill, or PAYS programs.

26. “MPS” means Market Potential Study.

27. “NEBs” means Non-Energy Benefits.

28. “PAYS” means Pay-as-You-Save®.¹

¹ PAYS® is a registered trademark of Energy Efficiency Institute, Inc. See Energy Efficiency Inst., Inc., *Pays® Essential Elements & Minimum Program Requirements* (updated July 20, 2021), <https://www.eeivt.com/pays-essential-elements-minimum-program-requirements-2/>.

29. "RFP" means Request for Proposal.
30. "TEE" means Targeted Energy Efficiency.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.

2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Movants. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement, and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.

3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.

5. The answers provided should first restate the question asked and also identify the person(s) supplying the information.

6. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a

claim of privilege and any other information pertinent to the claim that would enable Joint Movants or the Commission to evaluate the validity of such claims.

9. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.

10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

SUPPLEMENTAL DATA REQUESTS PROPOUNDED TO KENTUCKY POWER COMPANY BY JOINT INTERVENORS

- 2.1. For the most recent 12-month period for which Kentucky Power has data, please provide the average monthly energy usage for the following segments of customers, as well as the percentage of the total residential customers these segments represent (if applicable):
 - a. Single-family homes.
 - b. Single-family homes with primarily electric heat.
 - c. Households with income 200% or less of the Federal Poverty Level.
 - d. Households with the top 5% of energy consumption.
 - e. Households with the top 10% of energy consumption.
 - f. Households with the top 25% of energy consumption.

- 2.2. Please refer to Attachment 1 to the Company's response to Joint Intervenors' Data Request 1-2 and explain KPC's understanding of the term "conversion rate" as it is used in the GDS Associates document on PAYS.
 - a. Please provide comparable "conversion rate" statistics for the TEE program and an estimated "conversion rate" for the HEIP program. If these statistics are not available, please explain why.
 - b. Please provide any context or explanation for how KPC views the conversation rates referenced in the GDS document to compare to other energy efficiency programs.

- 2.3. Please refer to the Company's response to Joint Intervenors' Data Request 1-13(b).
 - a. Please explain why the Company does not maintain the requested information.
 - b. Does the Company have any plans to start tracking the number of referrals to the TEE program? Why or why not?
 - c. Does the Company believe that tracking referrals to the TEE program could provide a valuable metric for understanding the effectiveness of the TEE program? Please explain why or why not.

- 2.4. Please refer to the Company's supplemental response to Joint Intervenor's Data Request 1-17, filed July 19, 2024. Please explain the reason the Company only keeps this data "on a rolling three-year basis."

- 2.5. Please refer to the Company's response to Joint Intervenor's Data Request 1-19: "If a certain agency is on track to come in under or over budget, the Company will communicate that and reserves the right to re-allocate TEE program funding between the three primary agencies in its service territory. . . ."
 - a. How often has this scenario occurred over the period of July 2019 through June 2024?

- b. Does the Company have any data or information regarding the times this scenario has occurred? If so, please provide. If not, please explain why not.
- 2.6. For the period July 2019 through June 2024, for all residential customers please provide the following:
 - a. The number of customers who receive more than one termination notice per year (a rolling twelve-month period) for nonpayment.
 - b. The number of customers with service terminated for nonpayment more than once per year.
- 2.7. For the period July 2019 through June 2024, for TEE Program participants please provide the following:
 - a. The number of customers who receive more than one termination notice per year for nonpayment.
 - b. The number of customers with service terminated for nonpayment more than once per year.
- 2.8. Please refer to the Company's response to Joint Intervenors' Data Request 1-15, including KPCO_R_JI_1_15_Attachment1.² Please clarify whether the average monthly bill amount, average monthly payment amount, and average monthly usage provided (columns b, c, and d) refer to customer usage before or after participating in the program.
 - a. Does the Company collect monthly usage data from TEE program participants before and after the program?
 - i. If so, please provide the monthly bill amount, monthly payment amount, and monthly usage for the 12-month period before and after participation in the program, or for as many months as the data is available to the Company.
 - ii. If not, please explain why not.
- 2.9. Please provide the estimated energy savings by measure for the TEE program measures listed in the Company's response to Commission Staff's Data Request 1-5.
- 2.10. Please provide the rebate amount for each measure included in the Home Energy Improvement and Commercial Energy Solutions Programs.
- 2.11. Please provide the anticipated DSM surcharges for residential and commercial customers for 2026, 2027, and 2028 for the programs presented in the Company's application, i.e. using the Company's expected program budgets and participation rates, and assuming the same ratio of residential to commercial customers and no over- or under-collection.

² The text of the Company's data response refers to the attachment as "KPSC_R_JI_1_15_Attachment1," but Joint Intervenors believe the text is meant to refer to the document filed in the docket as "KPCO_R_JI_1_15_Attachment1."

- a. Please provide this amount including associated lost revenues and incentives.
 - b. Please provide this amount excluding associated lost revenues and incentives.
 - c. If the Company has not conducted such an analysis, please explain why not.
- 2.12. Please refer to the Company's response to Joint Intervenors' Data Request 1-66(a). Please state whether the decision to exclude new construction from consideration in the Market Potential Study was made by KPC or GDS.
- 2.13. Please refer to KPCO_R_KPSC_1_7_Attachment1, KPCO_R_KPSC_1_7_Attachment2, and KPCO_R_KPSC_1_7_Attachment3 included in the Company's response to Commission Staff's Data Request 1-7.

Please state whether any of the following avoided cost categories listed below are included in each of the Company's avoided cost calculations. If an avoided cost category listed below was included in the referenced avoided cost calculations, please provide the value, source of the value, and state whether the value is in nominal dollars or in real, inflation-adjusted dollars. If an avoided cost category listed below was *not* included in the referenced avoided cost calculations, please explain why not and identify what the Company believes an appropriate value for each such avoided cost category should be.

- a. Ancillary services
 - b. Transmission and distribution
 - c. Non-energy benefits (NEBs), specifying which NEBs are included
 - d. Increased reliability
 - e. Reduced exposure to fuel price volatility
 - f. Reduced exposure to environmental compliance costs
 - g. Reduced credit and collection costs
 - h. If not already identified in response to subparts (a)-(g), please identify each additional avoided cost category included in the "Other Utility Avoided Cost" line of the tables provided in the above-referenced attachment.
- 2.14. Please refer to KPCO_R_KPSC_1_7_Attachment1, KPCO_R_KPSC_1_7_Attachment2, and KPCO_R_KPSC_1_7_Attachment3 included in the Company's response to Commission Staff's Data Request 1-7.
- a. Please explain why KPCO_R_KPSC_1_7_Attachment1 includes values for "Other Utility Avoided Cost" under the Home Energy Improvement Program, but KPCO_R_KPSC_1_7_Attachment2 does *not* include values for "Other Utility Avoided Cost" under the Commercial Energy Solutions Program.
 - b. Please provide a portfolio-level summary of the Company's cost-effectiveness calculations that includes the HEIP, Commercial Energy Solutions Program, and TEE program.

- 2.15. Please refer to the Company's response to Joint Intervenors' Data Request 1-75, particularly the following statement: "The Company does not believe the previous under-recovery issue was a result of how the recovery mechanism was designed; instead, the previous under-recovery was largely due to an increase in DSM spend between annual filings that was agreed to as part of the settlement in Case No. 2012-00578."
- a. Did Witness Wolfram have any involvement in Case No. 2017-00097? If so, please explain the scope and substance of Witness Wolfram's involvement in Case No. 2017-00097.
 - b. Has Witness Wolfram personally evaluated, or caused to be evaluated, the factors that contributed to the previous under-recovery? If so, please state when that evaluation took place and provide supporting workpapers in native format with formulas intact.
 - c. If the answer to subpart (a) is no, please produce the analysis or analyses that cause the Company to believe that the "previous under-recovery was largely due to an increase in DSM spend between annual filings" To the extent that such analyses are supported by underlying workpapers, please produce each such workpaper in native format with formulas intact.
- 2.16. Please refer to the Company's response to Joint Intervenors' Data Request 1-20(b), which states that "[t]he Company has historically not conducted proactive outreach about the DOE's WAP and the Company's TEE program because it is not necessary given the forecasted spend and feedback from the agencies on the number of eligible customers on the waitlist."
- a. To the extent that agencies provided feedback on the number of eligible customers on the waitlist in writing, including via electronic communications, please provide those communications.
 - b. Please state when the Company received the "feedback from the agencies". If the Company received feedback on multiple occasions, please identify each such occasion over the last three years by month and year.
 - c. Please provide the approximate number of eligible customers on the waitlist, according to feedback from the agencies, at each time the Company received such feedback.
- 2.17. Please refer to Witness Wolfram's adopted direct testimony, p. 2, lines 5-10, and answer the following requests.
- a. Please detail in full Witness Wolfram's involvement in the preparation and presentation of the Company's initial filing in this proceeding, if any, including specifying whether involvement was undertaken in Witness Wolfram's prior role as a Regulatory Case Manager for AEPSC.

- b. Please detail in full Witness Wolfram’s involvement in the preparation and presentation to “management” of the DSM portfolio proposed in this proceeding.
 - c. Please identify who “management” refers to as used in the above-referenced testimony.
 - d. Please provide a list of Witness Wolfram’s prior testimony before regulatory bodies.
- 2.18. Please provide the Company’s projected levelized cost of energy savings for each program year of the proposed DSM program.³
- 2.19. Please refer to KPCO_Revised_Exhibit_SEB_2, tab “Input - Incentives.”
- a. Please provide justification and support for the Forecasted New Participants in the Targeted Energy Efficiency Program for 4/1/2024 through 12/31/2024.
 - i. Please provide an explanation for the significant increase from the prior year’s actual participation.
 - b. Please provide the justification for the Forecasted New Participants in the Targeted Energy Efficiency Program for 01/01/2025 through 12/31/2025.
- 2.20. Please refer to KPCO_Revised_Exhibit_SEB_2, tab “Net Energy Impact.”
- a. Please provide supporting evidence for the assumed net energy impact per participant for each of the programs.
 - b. Please provide the date(s) of evaluation of the energy savings assumed for the Targeted Energy Efficiency Program.
 - c. Please provide a copy of any evaluations performed on the Targeted Energy Efficiency Program in the last four years.
 - d. Please explain how the savings assumed are the same for all participants when there are varying measures implemented by the Kentucky Power funds.
 - e. Please explain how the annual savings assumed for Targeted Energy Efficiency Program participants are the same year-to-year from 2017 through 2023.
- 2.21. Please refer to KPCO_R_KPSC_1_1_Attachment1, included in the Company’s response to Commission Staff’s Data Request 1-1.
- a. Please confirm that column “FW,” with the heading “\$KPCO,” reports the Company’s costs per customer. If anything but confirmed, please explain.

³ For reference, the Company has previously calculated its projected levelized cost of energy savings from its DSM programs, see e.g., Case No. 2013-00487, Kentucky Power Company Comments in Response to Comments of Sierra Club and Alexander Desha, at 11 (May 8, 2014), http://psc.ky.gov/pscscf/2013%20cases/2013-00487/20140508_Kentucky%20Power%20Company_Comments%20in%20Response%20to%20Comments%20of%20Sierra%20Club%20and%20Alexander%20Desha.pdf.

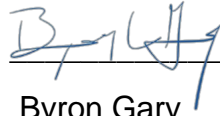
- b. Please confirm that column “FX,” with the heading “\$WAP,” reports the Department of Energy’s Weatherization Assistance Program costs per customer. If anything but confirmed, please explain.
- 2.22. Please refer to the Company’s response to Joint Intervenors’ Data Request 1-9, including that the baseline is based upon “either . . . the federal baseline or the average market condition depending on the type of measure.”
 - a. Please define “average market condition.”
 - b. Please describe in full how “average market condition” was determined, including but not limited to indicating the geographic scale of the underlying data (e.g., national, state, service territory).
- 2.23. Please refer to the Company’s response to Joint Intervenors’ Data Request 1-11. The term “conversion rate” refers to the conversion of audits to completed projects with one or more installed measures. Based on this clarification, please provide the estimated or expected conversion rate for the HEIP.
- 2.24. Please refer to the Company’s response to Joint Intervenors’ Data Request 1-22, including the statement that “\$1,000 was selected as the amount that would be impactful for each participating customer.”
 - a. Please define and quantify “impactful” as used in the referenced response.
 - b. Please identify what other amounts were discussed or considered by the CAAs and/or the Company.
- 2.25. Refer to the Company’s response to Joint Intervenors’ Data Request 1-23. Please provide the forecasted participation, by program, for 2026 and 2027.
- 2.26. Refer to the Company’s response to Joint Intervenors’ Data Request 1-33 and supplemental response to Joint Intervenors’ Data Request 1-33. Please provide an illustrative example of how the Company determines the net lost revenues cumulative for up to three years, with reference to years 2026, 2027, and 2028 for the currently proposed suite of three programs. For example, does this mean the cumulative 3-year savings would be savings achieved in years 2025, 2026, and 2027 would be counted in total in 2025, or does it mean that 2025 will reflect the savings from 2025 and in 2026, the savings will be 2025 plus 2026 savings?
- 2.27. Refer to the Company’s response to Joint Intervenors’ Data Request 1-43. Please describe whether and how the Company plans to work with any entities to promote financing for HEIP projects, including but not limited to community development financial institutions, credit unions, or local banks.

- 2.28. Refer to the Company's response to Joint Intervenors' Data Request 1-45.
- a. Please confirm that the Company does not work with potential industrial customers to incorporate renewable energy in new construction projects.
 - b. If confirmed, please explain why the Company does not promote renewable energy investment in new construction projects.
 - c. If not confirmed, please provide the details regarding when this process begins and what measures are encouraged as requested in Joint Intervenors' Data Request 1-45(a).
- 2.29. Please refer to the Company's response to Joint Intervenors' Data Request 1-33, including that "it has been the Company's practice that net lost revenues are cumulative for up to three-years absent an intervening base case," and answer the following requests:
- a. Please confirm that an intervening base rate case resets net lost revenue to zero. If anything but confirmed, please explain in full.
 - b. Please state at what procedural step, in the Company's opinion, an intervening base rate case should impact net lost revenues recovered through the DSM surcharge (e.g., upon the filing of a base rate case, at the start of the test year period used in the base rate case, on the date of the Commission's order in the rate case, etc.).
 - c. Please identify the date that net lost revenues changed based on the Company's most recent base rate case, Case No. 2023-00159.
 - d. Please explain the Company's basis for seeking to recover net lost revenues from the TEE Program for the time period of October 1, 2023 to December 31, 2023.
 - e. According to the Company's revised Exhibit SEB-2, the net lost revenues from the TEE Program for the time period of October 1, 2023 to December 31, 2023 includes savings from participants in program years 2021, 2022, and 2023. Please explain in full the basis for seeking to recover net lost revenues from program participation that pre-dates filing of the Company's most recent base rate case.
- 2.30. Please refer to KPCO_SR_JI_1_60_ConfidentialAttachment2, included in the Company's response to Joint Intervenors' Data Request 1-60.
- a. Please confirm that the residential sector load forecast data in the Attachment's tab labeled "Sector Data" matches the load forecast data provided in the Company's 2022 Integrated Resource Plan, filed April 1, 2022, Exhibit C-1 (p. 197 of 1182).⁴
 - i. If anything other than confirmed, please explain any discrepancies in the data used in this Attachment.
 - b. Related to the tab labeled "Assumptions," please answer the following:
 - i. Please provide the source(s) for the energy savings provided in this tab by measure.

⁴ Available at https://psc.ky.gov/pscecf/2023-00092/sebishop%40aep.com/03202023030104/KPCO_2022_IRP_Volume_A-Public.pdf.

- ii. For the Air Source Heat Pump measures that have a furnace baseline assumption, please explain why there are no associated natural gas savings with this measure.
 - iii. For the Air Source Heat Pump measures that have a furnace baseline assumption, please explain why there is not a negative effect from the heat pump replacing the furnace or, at a minimum, displacing the furnace to serve as a backup heat.
 - iv. Does the Company plan on assuming savings for early replacement of equipment? If so, please indicate which level of savings would be assumed.
- c. Related to the tab labeled "Load Shapes," please answer the following:
- i. The sources for the load shapes are noted in Column AA to be GDS. While labeled GDS, please confirm if these were based upon the Technical Resource Manuals and other documents that GDS relied upon. If confirmed, please indicate which documents. If anything but confirmed, please explain in full the source(s) used for the load shapes.
 - ii. Please explain why the load shapes for both electric and natural gas are set at 25% regardless of the time of year or measure.
- d. Related to the tab labeled "Annual Savings," please answer the following:
- i. Please explain why every measure is assumed to have a 20-year life.
 - ii. Please explain why the heat pump measures with a furnace baseline do not have associated natural gas savings.
- e. Related to the tab labeled "Annual Costs," please provide the source for the annual costs for each measure.
- 2.31. Refer to KPCO_SR_JI_1_73_ConfidentialAttachment3, included in the Company's response to Joint Intervenors' Data Request 1-73.
- i. Related to the tabs labeled "RES HVAC & HW" and "COM Prescriptive" please answer the following:
 - 1. Please detail why the measures savings assumptions are not based upon the baseline equipment replaced.
 - 2. Please provide an explanation as to why the Company is not claiming any savings related to natural gas, other fuels, and water savings for HVAC equipment that may have a natural gas baseline.
 - 3. Please provide the source for the net-to-gross ratios assumed for each measure.
 - ii. Related to the tab labeled "Portfolio 3Y," please explain why the TEE program is not included in this sheet and please provide the assumptions behind the costs and savings projected for the TEE program.

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, this is to certify that the electronic filing was submitted to the Commission on July 22, 2024; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron Gary