

DAVID J. MEYER
VICE PRESIDENT AND CHIEF COUNSEL FOR
REGULATORY & GOVERNMENTAL AFFAIRS
AVISTA CORPORATION
P.O. BOX 3727
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SPOKANE, WASHINGTON 99220-3727
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DAVID.MEYER@AVISTACORP.COM

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. AVU-E-23-01
OF AVISTA CORPORATION FOR THE)	CASE NO. AVU-G-23-01
AUTHORITY TO INCREASE ITS RATES)	
AND CHARGES FOR ELECTRIC AND)	
NATURAL GAS SERVICE TO ELECTRIC)	
AND NATURAL GAS CUSTOMERS IN THE)	
STATE OF IDAHO)	
_____)	

APPLICATION OF AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

1 Application is hereby made to the Idaho Public Utilities Commission for an Order
2 granting Avista Corporation (Applicant, Company, or Avista) the authority to increase its
3 rates and charges for electric and natural gas service to electric and natural gas customers
4 in the State of Idaho, to be effective on September 1, 2023 and September 1, 2024. (Order
5 No. 35156 in Case No(s.) AVU-E-21-01 and AVU-G-21-01 provided that “Avista shall
6 not file another electric or natural gas general rate case to increase base rates before
7 February 1, 2023, and any such rates will not go into effect before September 1, 2023.
8 Order at p.13) A September 1, 2023 effective date is consistent with 1.C. 61-622(4), that
9 provides that the Commission may extend the suspension period for an initial period “not
10 exceeding five (5) months.” A September 1, 2023 effective date will also align with the
11 expiration of Tax Customer Credit Schedule 76 on August 31, 2023. This alignment will
12 ensure that customers receive only one rate change, thus avoiding customer confusion.
13 Avista would ask that any suspension order issuing from the Commission identify
14 September 1, 2023 as the end of the suspension period.

15 In this filing Avista is requesting a Two-Year Rate Plan with a Rate Year 1 electric
16 base rate relief of \$37.5 million (14.7 percent billed) and natural gas base rate relief of
17 \$2.8 million (2.7 percent billed), effective September 1, 2023. The Company is also
18 requesting a Rate Year 2 electric base rate relief of \$13.2 million (4.5 percent billed) and
19 natural gas base rate relief of \$0.1 million (0.1 percent billed), effective September 1,
20 2024

21 As discussed further in the Company's filing, Avista will separately file with this
22 Commission on or before February 22, 2023, separate electric and natural gas

1 applications requesting Commission approval to revise its book depreciation rates for
2 both common/allocated plant and direct Idaho plant, effective September 1, 2023. The
3 effect of the proposed depreciation rates have been reflected by the Company in its Two-
4 Year Rate Plan.

5 In support of this Application, Applicant states as follows:

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I.

8 The name of the Applicant is Avista Corporation, dba Avista Utilities, a
9 Washington corporation whose principal business office is 1411 East Mission Avenue,
10 Spokane, Washington, which is qualified to do business in the State of Idaho. Avista
11 maintains district offices in Sandpoint, Coeur d'Alene, Moscow, and Lewiston, Idaho.
12 Communications in reference to this Application should be addressed to the following:

13

David J. Meyer, Esq.
Vice President and Chief Counsel for
Regulatory & Governmental Affairs
Avista Corporation
P.O. Box 3727
1411 E. Mission Ave
Spokane, WA 99220-3727
Phone: (509) 495-4316
David.Meyer@avistacorp.com

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Patrick D. Ehrbar
Director of Regulatory Affairs
Avista Utilities
P.O. Box 3727
1411 E. Mission Ave
Spokane, WA 99220-3727
Phone: (509) 495-8620
pat.ehrbar@avistacorp.com

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Electronically - AvistaDockets@Avistacorp.com

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II.

Avista is a public utility primarily engaged in the generation, transmission and distribution of electric power and the distribution of natural gas in certain portions of eastern and central Washington, northern Idaho, as well as distribution of natural gas in northeast and southwest Oregon. The Company is subject to the jurisdiction of this Commission, the Washington Utilities and Transportation Commission, the Public Utility Commission of Oregon, the Montana Public Service Commission, and the Federal Energy Regulatory Commission.

III.

Applicant’s existing base rates and charges for electric service were approved as a result of the Commission’s Order No. 35156, dated September 1, 2021, in Case No. AVU-E-21-01. The existing rates and charges for electric service on file with the Commission (designated as Applicant’s Tariff No. 28) are incorporated herein as though fully attached hereto.

Applicant's existing base rates and charges for natural gas service were approved as a result of the Commission's Order No. 35156, dated September 1, 2021, in Case No. AVU-G-21-01. The existing rates and charges for natural gas service on file with the Commission (designated as Applicant's Tariff No. 27) are incorporated herein as though fully attached hereto.

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IV.

The electric rates and charges which Applicant desires to have the Commission approve are filed herewith as Exhibit A. Also included in Exhibit A are copies of the tariff schedules showing the proposed changes by striking over the existing rates and underlining the proposed rates. Company witness Mr. Miller fully describes in his testimony and exhibits the proposed changes.

V.

The circumstances and conditions relied upon, and justification for, the approval of the proposed increase in rates for electric service are as follows:

Applicant’s present electric and natural gas rates will not produce sufficient revenue to provide operating income required to allow the Applicant the opportunity to earn the 7.59% rate of return being requested and supported in this Application.

The Applicant’s last electric and natural gas general rate case change (Case No. AVU-E-21-01 and AVU-G-21-01) in Idaho was effective in September 2021 and September 2022.

The primary factors driving the Company's electric and natural gas revenue requirements in Rate Year 1 and Rate Year 2 is an increase in net plant investment (including return on investment, depreciation and taxes, and offset by the tax benefit of interest) from that currently authorized. For Rate Year 1 and Rate Year 2, electric net power supply expenses also contribute significantly to the incremental electric revenue requirement in each year. Other changes impacting the Company’s revenue requirement

1 requests relate to increases in distribution, operation and maintenance (O&M), and
2 administrative and general (A&G) expenses for both electric and natural gas operations,
3 compared to current authorized levels.

4 Applicant's evidence in support of its need for increased electric and natural gas
5 rates is based on a 12-month ended June 30, 2022 test year. Applicant's rate base evidence
6 is presented on an average-monthly-average basis for each respective Rate Year.
7 Documentation showing how the test year data was adjusted is provided in the testimony
8 and exhibits of Company witness Ms. Schultz.

9 Applicant provides utility service in States other than Idaho. A jurisdictional
10 separation of all investments, revenues and expenses allocated or assigned in whole or in
11 part to the Idaho utility business regulated by this Commission is described in the
12 testimony and exhibits of Ms. Schultz.

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VI.

15 Applicant's evidence will show that an overall rate of return of 7.59% is fair, just
16 and reasonable. The Company's exhibits and testimony support an increase in retail
17 electric and natural gas revenue of \$37.5 million and \$2.8 million, respectively, for Rate
18 Year 1 (September 2023 through August 2024) and \$13.2 million and \$0.1 million,
19 respectively, for Rate Year 2 (September 2024 through August 2025). Simultaneous with
20 the filing of this Application, Applicant has filed its prepared direct testimony and
21 exhibits in support of its revised rates, as well as workpapers showing how test year data
22 were adjusted.

1 **VII.**

2 A complete justification of the proposed increases in electric and natural gas rates
3 is provided in the testimony and exhibits of Company witnesses. These witnesses and a
4 brief summary of their testimony are as follows.

5 Mr. Dennis P. Vermillion, President, and Chief Executive Officer of Avista,
6 presents the Company’s policy testimony and provides an overview of Avista
7 Corporation. He will provide an overview of the Company’s proposal in this filing for a
8 Two-Year Rate Plan. He will start by discussing the overall economic conditions facing
9 Avista, and how those have impacted our operations, our cost management, and this
10 general rate case. He will then summarize the Company’s proposal in this filing, and
11 address our continuing capital investment, which continues to be the primary driver
12 behind the Company’s most recent general rate cases. He discusses our continued focus
13 on communicating with customers, our overall customer satisfaction, and our customer
14 support programs. Finally, he introduces the other Company witnesses who support this
15 general rate case filing.

16 Mr. Mark Thies, Executive Vice President, Chief Financial Officer and Treasurer,
17 will provide a financial overview of Avista Corporation as well as explain our credit
18 ratings and the Company’s proposed capital structure and overall rate of return in this
19 case. In brief, he provides information that shows:

- 20 1. Avista’s plans call for a continuation of utility capital investments in
21 generation, transmission, electric and natural gas distribution systems, and
22 technology to preserve and enhance service reliability for our customers,
23 including the continued replacement of aging infrastructure. Capital
24 expenditures of \$475 million per year (system) are planned for the five-year
25 period ending December 31, 2027. Avista needs adequate cash flow from

- 1 operations to fund these requirements, together with access to capital from
2 external sources under reasonable terms, on a sustainable basis.
3
4 2. We are proposing an overall rate of return of 7.59 percent, which includes a
5 50 percent common equity ratio, a 10.25 percent return on equity, and a cost
6 of debt of 4.92 percent. We believe our proposed overall rate of return of 7.59
7 percent and the proposed capital structure provide a reasonable balance
8 between safety and economy.
9
10 3. Avista’s corporate credit rating from Standard & Poor’s (S&P) is currently
11 BBB and Baa2 from Moody’s Investors Service, However, in November
12 2022, S&P revised their outlook on Avista to negative from stable and
13 affirmed our ‘BBB’ issuer credit rating. S&P cited weaker financial measures
14 due to higher expenses (inflation), customer refunds, rising interest rates and
15 delayed recovery of purchased fuel costs as reasons for their revision. Avista
16 must operate at a level that will support a solid investment grade corporate
17 credit rating in order to access capital markets at reasonable rates. A
18 supportive regulatory environment is an important consideration by the rating
19 agencies when reviewing Avista. Maintaining solid credit metrics and credit
20 ratings will also help support a stock price necessary to issue equity under
21 reasonable terms to fund capital requirements.
22
23

24 Mr. Adrien McKenzie, as President of Financial Concepts and Applications
25 (FINCAP), Inc., has been retained to present testimony with respect to the Company’s
26 cost of common equity. He concludes that:

- 27
- 28 • To reflect the risks and prospects associated with Avista’s jurisdictional utility
29 operations, his analyses focus on a proxy group of 22 utilities with comparable
investment risks.
 - 30 • Because investors’ required return on equity is unobservable and no single
31 method should be viewed in isolation, he applies the DCF, CAPM, ECAPM,
32 and risk premium methods to estimate a fair ROE for Avista, as well as
33 referencing the expected earnings approach.
 - 34 • Based on the results of these analyses and giving less weight to extremes at
35 the high and low ends of the range, he concludes that the cost of equity for the
36 proxy group of utilities is in the **9.9 percent to 11.3 percent** range, or **9.97**
37 **percent to 11.37 percent** after incorporating an adjustment to account for the
38 impact of common equity flotation costs.
 - 39 • As also reflected in the testimony of Mark T. Thies, Avista is requesting a fair
40 ROE of **10.25 percent**, which is below the **10.67 percent** midpoint of his
41 recommended range. Considering capital market expectations, the exposures

1 faced by Avista, and the economic requirements necessary to maintain
2 financial integrity and support additional capital investment even under
3 adverse circumstances, it is his opinion that 10.25 percent represents a
4 reasonable ROE for Avista.

5
6 Ms. Kaylene Schultz, Manager of Regulatory Affairs, describes accounting and
7 financial data in support of the Company's Two-Year Rate Plan for the period September
8 1, 2023, through August 31, 2025. She explains pro formed operating results, including
9 expense and rate base adjustments made to actual operating results and rate base. In
10 addition, she incorporates the Idaho-share of the proposed adjustments of other witnesses
11 in this case.

12 Ms. Elizabeth Andrews, Senior Manager of Revenue Requirements, describes
13 various adjustments included in the electric and natural gas revenue requirement studies
14 prepared for the Company's proposed Two-Year Rate Plan. These adjustments include
15 the following: 1) Pro Forma Wildfire Plan Expenses, 2) Pro Forma Insurance Expense,
16 3) Pro Forma EDIT (RSGM)¹, 4) Pro Forma Miscellaneous Operations and Maintenance
17 (O&M) Expense, and 5) Pro Forma Colstrip Capital Additions & Amortization Expense.²
18 In addition, she discusses the Company's requests to update its Wildfire Balancing
19 Account baseline to match pro formed wildfire plan expenses, as well as discusses the
20 Company's proposal to establish an Insurance Expense Balancing Account and baseline
21 to reflect the significant increase and volatility in insurance expenses. Finally, she
22 discusses the accounting methodology change related to the Company's Excess Deferred

¹ Reverse South Georgia Method

² The Company has reflected a change in accounting method for EDIT expense from the Average Rate Assumption Method (ARAM) to the Reverse South Georgia Method (RSGM). This accounting change results in a minimal reduction to Idaho electric and natural gas EDIT expenses.

1 Income Taxes (EDIT) expense that has occurred since the Company prior general rate
2 case, as well as provided an update on the Company's electric and natural gas deferred
3 federal tax credit balances.

4 Mr. Scott Kinney, Vice President of Power Supply, provides an overview of
5 Avista's electric and natural gas resource planning and power and natural gas supply
6 operations. This overview includes summaries of the Company's current and future
7 resource plans, as well as an overview of the Company's Energy Resources Risk Policy.
8 He addresses the generation-related capital projects included in the Company's Two-Year
9 Rate Plan filed in this case, including capital additions associated with the Company's
10 investment in Colstrip Unit Nos. 3 and 4 pro-formed in this case (i.e. the 2022 Dry Ash
11 project). He concludes with a discussion of the Chelan PUD Power Purchase Agreement.

12 Mr. Clint Kalich, Senior Manager of Resource Planning & Power Supply
13 Analyses, includes documentation of the rationale for key inputs and assumptions driving
14 power supply cost values, including loads, natural gas and electricity prices, and a
15 comparison to current levels of authorized power supply expense. He provides an
16 overview on contract changes since our last filing, including our newly signed Columbia
17 Basin Hydro contract, and discusses Washington State's new Climate Commitment Act
18 (CCA) and how its limitations on thermal plant carbon emissions affect Idaho costs.
19 Finally, he identifies and explains the proposed pro forma adjustments to test period
20 power supply revenues and expenses, including the Retail Revenue Credit used in the
21 Power Cost Adjustment (PCA).

22 Mr. Kenneth Dillon, Senior Manager, FERC Policy and Transmission Services,

1 presents Avista’s transmission revenues and expenses included in the Company’s request
2 for rate relief over the Two-Year Rate Plan, supporting updated transmission revenues
3 effective September 1, 2023 (Rate Year 1) and September 1, 2024 (Rate Year 2).

4 Mr. Joshua DiLuciano, Vice President of Energy Delivery, will provide an
5 overview of the Company’s electric and natural gas energy delivery facilities and explain
6 the factors driving our continuing investment in electric distribution infrastructure. He
7 explains how our efforts to maintain the asset health and performance of our electric
8 transmission system, including compliance with mandatory federal standards for
9 transmission planning and operations, is driving a continuing demand for new investment.
10 Further, he describes why our investments in natural gas distribution are necessary in the
11 time frames completed and why each capital investment in our operations facilities and
12 fleet operations is needed to support the efficient delivery of service to our customers,
13 today and into the future. Furthermore, he addresses the electric and natural gas
14 distribution, transmission, general plant and fleet-related capital additions included in the
15 Company’s Two-Year Rate Plan filed in this case, for the periods July 1, 2022 through
16 August 2025.

17 Mr. David Howell, Director of Electric Operations and Asset Maintenance,
18 discusses the status of the Company’s Wildfire Resiliency Plan (“Wildfire Plan” or “Plan”),
19 reiterates its goals and objectives, and summarizes the technical and operational aspects of
20 the Plan. Avista’s Wildfire Plan reflects the Company’s 130-year operating history,
21 combined with recent efforts to quantify and respond to the financial, safety-related, and
22 service reliability risks associated with wildfires.

1 Mr. James Kensok, Vice President and Chief Information and Security Officer,
2 provides an overview of, and discusses costs associated with, the Company’s Information
3 Service/Information Technology (IS/IT) programs, projects and security. These costs are
4 comprised of the capital investments for a range of IS/IT projects that support systems used
5 by the Company, as well as cyber and physical security projects and costs. He explains why
6 our information technology and security investments are necessary in the time frames
7 indicated and why investments in technology are necessary. In addition, he describes the
8 capital additions, and incremental expenses, associated with the Company’s IS/IT costs
9 included over the Two-Year Rate Plan.

10 Ms. Nicole Hydzik, Director of Energy Efficiency, will provide an overview of
11 the Company’s “Customer at the Center” initiative as discussed earlier in my testimony,
12 and addresses the rationale for the projects that we have included in this rate case over
13 the Two-Year Rate Plan.

14 Ms. Tia Benjamin, Manager of Regulatory Affairs, describes the Company’s
15 restated twelve-months ended June 30, 2022, net plant from average-of-monthly-averages
16 (AMA) to end-of-period (EOP) adjustment, as well as explains how pro forma capital
17 additions for the period of July 1, 2022 through August 31, 2025, including the effect of
18 newly proposed depreciation rates, are incorporated into the Company’s Two-Year Rate
19 Plan and proposed electric and natural gas revenue requirements sponsored by Ms.
20 Schultz.

21 Mr. John Spanos, President of the firm Gannett Fleming Valuation and Rate
22 Consultants, LLC, sponsors the depreciation study performed for Avista. He states that

1 the depreciation rates as of December 31, 2021, appropriately reflect the rates at which
2 the values of Avista's assets have been consumed over their useful lives to date. These
3 rates are based on the most commonly used methods and procedures for determining
4 depreciation rates. The life and net salvage parameters are based on widely used
5 techniques and the depreciation rates are based on the average service life procedure and
6 remaining life method. Therefore, the depreciation rates set forth in his Exhibit represent
7 the calculated rates as of December 31, 2021. Ms. Benjamin reflects the results of his
8 developed depreciation rates per the Depreciation Study within her capital adjustments,
9 impacting the Idaho electric and natural gas revenue requirement over the Two-Year Rate
10 Plan proposed in this proceeding.

11 Dr. Grant Forsyth, Chief Economist, describes the inflationary pressures facing
12 the Company that I discussed earlier in my testimony. He also discusses the proposed
13 methodology changes to the Company's weather normalization process.

14 Mr. Marcus Garbarino, Manager of Regulatory Affairs, covers the Company's
15 electric revenue normalization adjustment to the test year results of operations, the
16 proposed Load Change Adjustment Rate to be used in the Power Cost Adjustment and
17 Fixed Cost Adjustment mechanisms, and the electric cost of service study performed for
18 this proceeding.

19 Mr. Joel Anderson, Regulatory Analyst, covers the Company's natural gas cost-
20 of-service study performed for this proceeding. Additionally, he is sponsoring the natural
21 gas revenue normalization adjustments to the test year results of operations.

22 Mr. Joseph Miller, Senior Manager of Rates and Tariffs, discusses the spread of

1 the proposed 2023 and 2024 electric and natural gas base revenue increases among the
2 Company's electric and natural gas general service schedules. His testimony will also
3 describe the changes to the rates within the Company's electric and natural gas service
4 schedules, and proposed changes to the residential basic charges.

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VIII.

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Avista has provided under separate cover an Attorney's Certificate and Claim of Confidentiality Relating to Portions of Avista's Exhibits and Workpapers pursuant to Idaho Code Section 9-340D and IDAPA 31.01.01.067 and 31.01.01.233.

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IX.

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Notice to the public of the proposed rates and charges, pursuant to IDAPA 31.01.01.125, will be given to customers by distributing a customer notice, as a bill stuffer, to each customer over a billing cycle (During the months of June and July 2023), and by a news release, both of which are attached as Exhibit B.

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Portions of the Company's Application and accompanying testimony and exhibits are based on computer models. Documentation and explanation on some of the models have already been provided to Commission Staff. Additional documentation and explanation are provided with testimony, exhibits and workpapers in this filing. Further information can be provided upon request.

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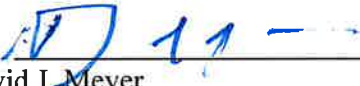
XI.

The Applicant stands ready for immediate consideration of this Application.

WHEREFORE Applicant requests the Commission issue its Order finding the proposed rates and charges to be fair, just, reasonable and nondiscriminatory. The Applicant is also requesting that the Commission suspend the Applicant's filing with a proposed effective date of September 1, 2023. Under the Company's proposal, the suspended tariffs for 2023 would go into effect on September 1, 2023, as stated on those tariff sheets.

DATED at Spokane, Washington, this 31st day of January 2023.

AVISTA CORPORATION

By:  _____
David J. Meyer
Vice President and Chief Counsel for
Regulatory & Governmental Affairs
Avista Corporation

1 STATE OF WASHINGTON)

2 : ss

3 County of Spokane)

4

5 David J. Meyer, being duly sworn, on oath deposes and says:

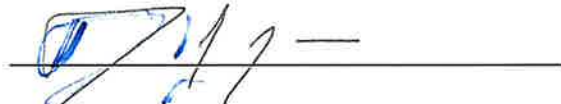
6 That he is the Vice President and Chief Counsel of Regulatory and Governmental Affairs
7 of Avista Corporation;

8 That he has read the foregoing Application, knows the contents thereof, and believes the
9 same to be true.

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David J. Meyer

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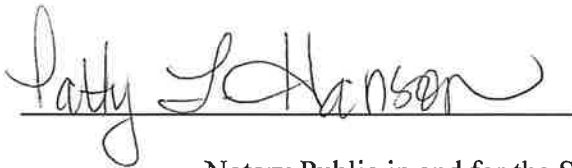
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16 Subscribed and sworn to before me this 31st day of January 2023.

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Notary Public in and for the State
Washington, residing in Spokane

21





February 1, 2023

Ms. Jan Noriyuki
Commission Secretary
11331 W. Chinden Blvd
Building 8, Suite 201-A
Boise, ID 83714

RE: Tariff I.P.U.C. No. 28 (Electric) and Tariff I.P.U.C. No. 27 (Natural Gas)
Case Nos. AVU-E-23-01 and AVU-G-23-01

Avista is providing the Company's Application for Case Nos. AVU-E-23-01 and AVU-G-23-01, with all case documents being provided electronically using the OneDrive application. Due to storms in Memphis, Tennessee affecting FedEx deliveries, physical copies of all case materials are anticipated to be provided to the Commission in no more than 48 hours.

Please direct any questions related to this filing to Liz Andrews at 509-495- 8601.

Sincerely,

/s/ David J. Meyer

David Meyer
Vice President and Chief Counsel
for Regulatory & Governmental Affairs

Enclosures



January 31, 2023

Ms. Jan Noriyuki
Commission Secretary
11331 W. Chinden Blvd
Building 8, Suite 201-A
Boise, ID 83714

RE: Tariff I.P.U.C. No. 28 (Electric) and Tariff I.P.U.C. No. 27 (Natural Gas)
Case Nos. AVU-E-23-01 and AVU-G-23-01

Enclosed for filing with the Commission are an original and eight copies of an Application by Avista Corporation, dba Avista Utilities (Avista), dated January 31, 2023 for approval of revised electric and natural gas rates, to be effective September 1, 2023. (Order No. 35156 in Case No(s.) AVU-E-21-01 and AVU-G-21-01 provided that “Avista shall not file another electric or natural gas general rate case to increase base rates before February 1, 2023, and any such rates will not go into effect before September 1, 2023. Order at p. 13) A September 1, 2023 effective date is consistent with 1.C. 61-622(4), that provides that the Commission may extend the suspension period for an initial period “not exceeding five (5) months.” A September 1, 2023 effective date will also align with the expiration of Tax Customer Credit Schedule 76 on August 31, 2023. This alignment will ensure that customers receive only one rate change, thus avoiding customer confusion. Avista would ask that any suspension order issuing from the Commission identify September 1, 2023 as the end of the suspension period.

Avista has also included for filing eight copies of its prepared direct testimony, and exhibits in support of its revised rates, as well as electronic copies of workpapers showing how test period data were adjusted. Finally, the court reporter copy is provided on a thumb drive with all documents in Word format.

Computer-readable copies of the testimony, exhibits, and workpapers, required under Rule 231.05, are included on the enclosed thumb drive.

Attached to the Application is the form of Customer Notice and form of Press Release to be issued by the Company. Additionally, Avista has included the Attorney's Certificate and Claim of Confidentiality Relating to Portions of Avista's Exhibits and Workpapers.



Please direct any questions related to the transmittal of this filing to Liz Andrews at 509-495- 8601.

Sincerely,

/s/ David J. Meyer

David Meyer
Vice President and Chief Counsel
for Regulatory & Governmental Affairs

Enclosures