COMMERCE DEPARTMENT

November 2, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G008/GR-20-704

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> CenterPoint Energy's (CenterPoint, the Company) Decoupling Evaluation Report for its Revenue Decoupling Rider for the July 2019 through June 2020 period.

The decoupling evaluation report was filed on September 1, 2020 by:

> Andrew Sudbury
> Manager - Regulatory Portfolio Management Office
> CenterPoint Energy
> 505 Nicollet Mall, PO Box 59038
> Minneapolis, MN 55459-0038

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept CenterPoint Energy's 2020 Decoupling Evaluation Report and approve the Company's decoupling refund adjustments for the July 2019 through June 2020 program year that CenterPoint Energy implemented September 1, 2020.**

The Department appreciates CenterPoint's cooperation and assistance in this matter. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G008/GR-20-704

I. BACKGROUND

On June 9, 2014, the Minnesota Public Utilities Commission (Commission) issued its *Findings of Fact, Conclusions of Law, and Order (Rate Case Order)* in CenterPoint Energy's (CenterPoint, the Company) 2013 General Rate Case, Docket No. G008/GR-13-316. As part of this *Rate Case Order*, the Commission authorized CenterPoint to implement a full Revenue Decoupling Rider (RD Rider) under Minnesota Statute § 216B.2412.[1] Ordering Point 3 in the Commission's *Rate Case Order* required the Company to submit proposals for annual evaluation reports, and a comprehensive customer outreach and education program. The Company filed this information on October 14, 2014.

The Company submitted its first Decoupling Evaluation Report on September 1, 2016 (2016 Decoupling Report) in compliance with the Commission's Order Point 3 and as set forth in CenterPoint's October 14, 2014 filing. The 2016 Decoupling Report encompassed the period from July 1, 2015 to June 30, 2016.

On November 1, 2016, the Minnesota Department of Commerce, Division of Energy Resources (Department) submitted its comments on the 2016 Decoupling Report recommending that the Commission approve the Company's proposed decoupling adjustment factors, subject to potential adjustment given interim rate refunds and final rates resulting from the Company's 2015 general rate case (Docket No. G008/GR-15-424). The Department also recommended that CenterPoint provide information based on both 10-year and 20-year normal weather in subsequent annual evaluation plan filings.

On November 14, 2016 the Company submitted Reply Comments providing the information previously provided that was based on 10-year normal weather in a 20-year normal format, as requested by the Department.

On December 28, 2016 the Commission issued its Order accepting CenterPoint's 2016 revenue decoupling evaluation report, approving CenterPoint's revenue decoupling rate adjustments to go into effect on September 1, 2016 and ordered CenterPoint to provide information based on 20-year normal weather in subsequent annual evaluation plan filings.

[1] The full RD Rider replaced the Company's partial Conservation Enabling Rider (CE Rider), which was approved in Docket No. G008/GR-08-1075 and expired on June 30, 2013.

On February 1, 2017, the Company submitted a Supplemental Filing requesting a change in decoupling factors to be implemented on February 1, 2017. The new February Adjusted Decoupling Factors were necessary to reflect the final rates set in CenterPoint's 2015 Rate Case (Docket No. G008/GR-15-424), which were approved on November 9, 2016.

On March 3, 2017 the Department submitted comments recommending that the Commission allow the Company to continue to use the February Adjusted Decoupling Factors it implemented February 1, 2017.

On March 29, 2017 the Commission issued its Order allowing CenterPoint to continue to use the February Adjusted Decoupling Factors implemented on February 1, 2017.

On September 1, 2017, CenterPoint submitted its second Decoupling Evaluation Report (2017 Decoupling Report). The 2017 Decoupling Report encompassed the period from July 1, 2016 to June 30, 2017. In this 2017 Decoupling Report, CenterPoint provided the data and supporting calculations for the decoupling adjustment factors that were implemented on customer bills effective September 1, 2017.

On October 30, 2017, the Department submitted its initial comments on CenterPoint's 2017 Decoupling Report, recommending approval.

On February 15, 2018 the Commission issued its Order accepting the second revenue decoupling report and approving the Company's adjusted decoupling factors. The Commission also approved the Company's request that the decoupling pilot be extended until the Commission made a final decoupling determination in the Company's 2017 rate case.

On August 8, 2017, the Company filed a rate case in Docket G-008/GR-17-285, which included a request to make the Company's full revenue decoupling rider a regular feature of CenterPoint's tariff instead of just being a pilot program.

On July 20, 2018, the Commission issued its *Order Accepting and Adopting Agreement Setting Rates* in Docket G-008/GR-17-285 which included making the RD Rider a regular feature of CenterPoint's tariff and modifying the definition of "Allowed Revenues" to be the Authorized Revenues per customer multiplied by the actual evaluation period number of customers, calculated each month of the evaluation period, and summed.

On September 4, 2018, the Company submitted its third Decoupling Evaluation Report (2018 Decoupling Report). The 2018 Decoupling report encompassed the period from July 1, 2017 to June 30, 2018. In this 2018 Decoupling Report, CenterPoint provided the data and supporting calculations for the decoupling adjustment factors that were implemented on customer bills effective September 1, 2018.

On October 15, 2018, the Department submitted its initial comments on CenterPoint's 2018 Decoupling Report, recommending approval. On October 29, 2018, the Department submitted revised Comments to address an error with a table in the previous comments.

On January 14, 2019 the Commission issued its Order accepting the third revenue decoupling report and approving the Company's adjusted decoupling factors.

On September 3, 2019, the Company submitted its Decoupling Evaluation Report for the 2018-2019 year (2019 Decoupling Report). The 2019 Decoupling report encompassed the period from July 1, 2018 to June 30, 2019. In this 2019 Decoupling Report, CenterPoint provided the data and supporting calculations for the decoupling adjustment factors that were implemented on customer bills effective September 1, 2019.

On October 31, 2019, the Department submitted its initial comments on CenterPoint's 2019 Decoupling Report, recommending approval.

On January 30, 2020 the Commission issued its Order accepting the fourth revenue decoupling report and approving the Company's adjusted decoupling factors. The Commission also requested that stakeholders work with the Department to develop a more streamlined version of the Annual Evaluation Report.

On July 1, 2020, the Department submitted recommendations for a streamlined version of the annual evaluation report. On July 31, 2020, CenterPoint filed a letter in support of the Department's recommendations.

On September 1, 2020, the Company submitted its Decoupling Evaluation Report for the 2019-2020 year (2020 Decoupling Report, Evaluation Report, or Report). The 2020 Decoupling report encompassed the period from July 1, 2019 to June 30, 2020. In this 2020 Decoupling Report, CenterPoint provided the data and supporting calculations for the decoupling adjustment factors that were implemented on customer bills effective September 1, 2020.

II. DEPARTMENT EVALUATION

A. OVERVIEW

The purpose behind CenterPoint's full RD Rider is to eliminate the Company's throughput incentive and thus eliminate the Company's disincentive to encourage its customers to invest in energy savings. Under the full RD Rider, the Commission allows CenterPoint to recover its authorized revenues for non-fuel costs, regardless of causes in variation (including weather, changes in economic factors, customer growth, etc.), up to the approved revenue cap. In general, the actual customer count and sales volumes are used to calculate revenue. The revenue, referred to in the model as "non-gas margin," reflects the basic delivery charge and the base per-therm delivery charge, less Conservation Improvement Program (CIP) and Gas Affordability Program (GAP) charges, times the actual volumes of sales. The actual non-gas revenue is compared to the authorized revenue that results from the authorized number of customers and authorized sales volumes in a rate class.[2] Any excess revenue will be returned to customers, and any revenue shortfall, up to ten percent of non-gas margin including GAP, for each individual rate class, will be surcharged over the next 12-month period. If the Company under recovers, the Company's surcharge in the subsequent year is capped at 10 percent of non-gas authorized revenues. If the Company over recovers, the Company is required to refund all revenues above the authorized amount over the subsequent year.

As noted above, the Company proposed its RD Rider Evaluation Plan on October 14, 2014 and the Commission approved the communication plan on March 23, 2015 and the rider evaluation compliance on March 31, 2015. On July 20, 2018 the Commission issued its *Order Accepting and Adopting Agreement Setting Rates* in Docket G-008/GR-17-285 which made the RD Rider a regular feature of the Company's tariff.

As stated above on July 1, 2020, the Department submitted recommendations for a streamlined version of the annual evaluation report, with the Company later agreeing. If approved by the Commission, a new streamlined format for the report will be used.

CenterPoint's 2020 Decoupling Evaluation Report includes the following sections:

- Executive Summary;
- Changes to Streamline Evaluation Report;
- Conservation Program Commitment;
- Revenue Accrued and Collected under Full Revenue Decoupling;
- Related Rate and Customer Usage Information;
- Other Information; and
- Attachment List.

Below, the Department discusses CenterPoint's energy conservation achievements compared to the pre-decoupling baseline (2007-2009), the Company's overall commitment to increasing its energy savings, the Company's accrual and collection of revenues under the full decoupling program and the impact of the RD Rider on customer rates going forward.

B. CENTERPOINT'S ENERGY SAVINGS

Below, the Department notes some of the highlights of CenterPoint's 2020 Decoupling Report, which provided substantial data and analyses concerning changes in the Company's Conservation Improvement Program (CIP). Data provided in the Company's Evaluation Report indicates that

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[2] As noted in the RD Rider tariff (Section V, page 28.a paragraph 4), authorized revenue is determined to be the Authorized Revenue-Per-Customer multiplied by the actual Evaluation Period number of customers, calculated monthly and summed.

CenterPoint's CIP energy-savings achievements have grown substantially compared to the pre-decoupling period.

As stated in the Department's April 29, 2014 comments on the Company's Decoupling Evaluation Report for Calendar Year 2013 (Docket No. G008/GR-08-1075), the Department continues to conclude that the Company's increase in energy savings since the implementation of decoupling was not necessarily due solely to CenterPoint's decoupling pilot because, during the same time that the Company's decoupling pilot programs have been in place, the following policies were in place, which could have contributed to the Company's higher energy savings:

- Minnesota adopted an energy savings goal of 1.5 percent of retail sales,
- The Shared Savings Demand Side Management (DSM) Financial Incentive was increased for utilities to encourage them to work towards and surpass the State energy savings goal. CenterPoint received CIP financial incentives averaging more than $9 million per year over the RD program periods,
- Federal tax incentives to encourage homeowners to make energy-efficient investments in their home were in effect during this time,
- Customers became more aware of energy conservation in general.

Regardless of the cause, the Department commends CenterPoint for its excellent results, which are discussed below.

1. Level of Energy Savings

The energy savings noted below are presented both as *first-year* energy savings, which refers to the amount of energy savings that would result from the energy conservation technologies and processes during the first 12 months after implementation, and *lifetime* energy savings, which refers to the energy savings expected during the lifetime of each of the energy conservation measures and processes.

Figure 1 (Graph C-2 a on page 15 of CenterPoint's Evaluation Report) illustrates the Company's annual increase in energy savings for the years 2015 to 2019 compared to the average of CenterPoint's 2007-2009 CIP energy savings, which is the three-year period prior to:

- the commencement of the Company's original, partial decoupling mechanism, the Conservation Enabling (CE) Rider,
- the new Shared Savings DSM financial incentive mechanism (approved on January 27, 2010); and
- the beginning of the 1.5 percent energy savings goal established in the 2007 Next Generation Energy Act.

Figure 1: CenterPoint Customer Segment Energy Savings (Dth)

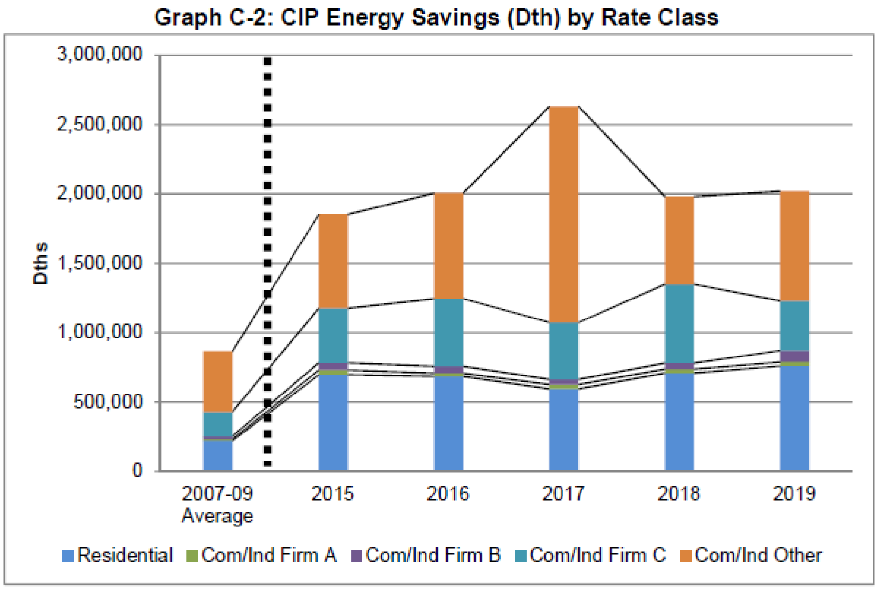


Table 1 below (CenterPoint's Table C-2 on page 15 of CenterPoint's Evaluation Report and data from previous reports) shows the data underlying Figure 1 to facilitate evaluating changes in individual customer classes.

Table 1: CenterPoint Historical First-Year CIP Energy Savings (Dth) by Rate Class

Year/Period	Residential	Com/Ind Firm A	Com/Ind Firm B	Com/Ind Firm C	Com/Ind Other	Overall Program
2007-09 Average	219,299	11,041	21,648	175,833	435,901	**825,030**
2015	696,979	33,531	51,173	394,337	675,910	**1,851,930**
2016	685,065	21,722	50,871	486,744	761,612	**2,006,014**
2017	594,341	32,276	35,507	410,450	1,559,9	**2,632,545**
2018	708,736	28,325	42,846	568,983	631,644	**1,980,534**
2019	759,882	28,246	82,115	359,236	790,669	**2,020,149**
2019 Percent Change From 2007-09	247%	156%	279%	104%	81%	**234%**

As can be seen in Table 1, CenterPoint's 2019 energy savings achievements fell from the high of 2017 but increased compared to 2018 and 2016, making 2019 the second highest year of savings in the Company's decoupling history. All of CenterPoint's customer classes had higher energy savings in 2019 compared to the average of the pre-decoupling years 2007-2009.

Table 2 below shows how each customer category contributed to the Company's increase in energy savings between 2019 and the average of 2007-2009.

Table 2: Comparing 2019 CenterPoint CIP Energy Savings For All Classes with Average of 2007-2009 CIP Energy Savings (Dth)

Customer Class	Residential	Com/Ind Firm A	Com/Ind Firm B	Com/Ind Firm C	Com/Ind Other	Total
Energy Savings Increase (Dth)	540,583	17,205	60,467	183,403	354,768	1,195,119
Energy Savings Increase as Percentage of Total Increase	45.2%	1.4%	5.1%	15.3%	29.7%	

A review of Table 2 above indicates that, in terms of first-year Dth savings, the commercial and industrial customer segments combined provided the largest increase in energy savings, although the residential sector is very close.

Table 3 below (CenterPoint's Table C-4 on page 19 of its Report) shows the Company's CIP energy savings as a percent of weather-normalized non-CIP-exempt retail sales.

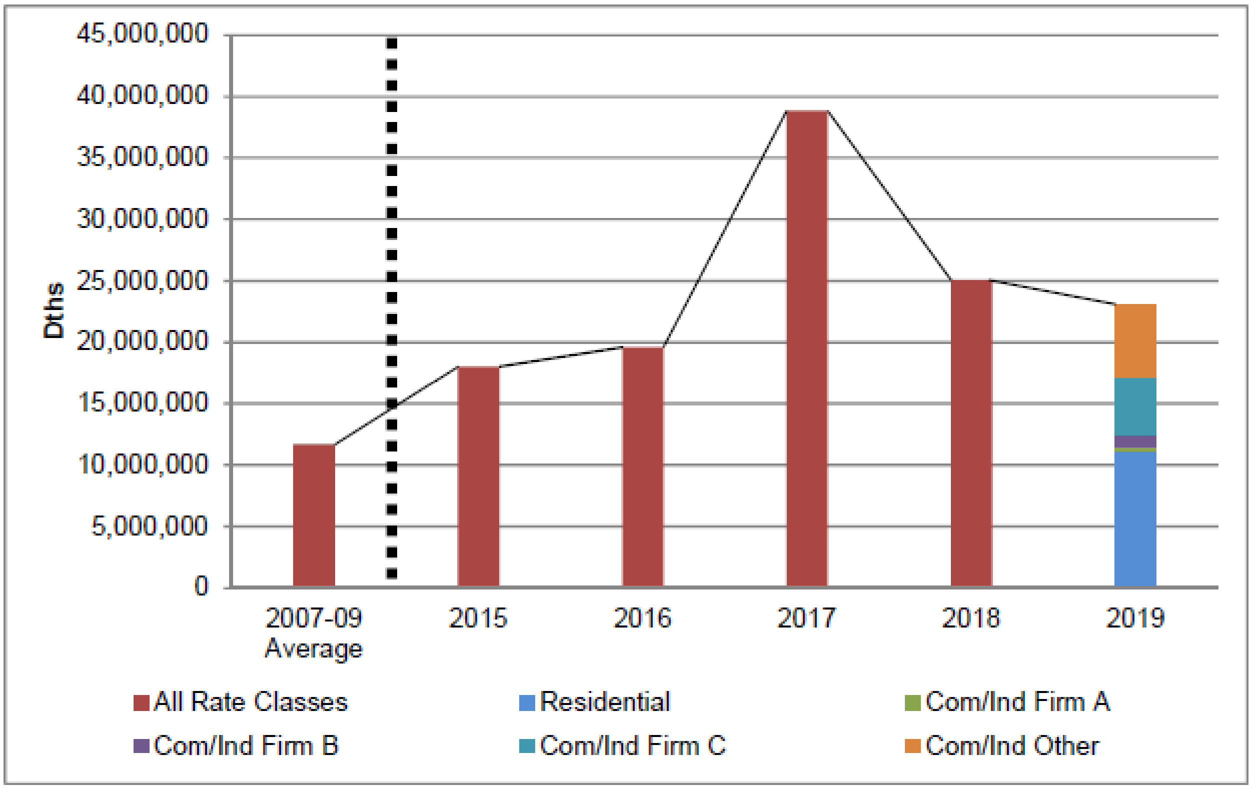
Table 3: CenterPoint CIP Energy Savings as a Percent of 10-Year Weather-Normalized Sales

CIP Plan Period	Year	The applicable three-year average 10-year weather normalized sales (Dth)	Annual energy savings (Dth)	Energy savings as a percent of sales
2007-2008 Biennial Period	2007	153,605,433	825,030	**0.54%**
	2008	153,605,433	827,340	**0.54%**
Extension of 2008 Biennial	2009	153,605,433	938,798	**0.61%**
2010-2012 Triennial Period	2010	148,502,961	1,300,228	**0.88%**
	2011	148,502,961	1,488,231	**1.00%**
	2012	148,502,961	1,330,518	**0.90%**
2013-2015 Triennial Period	2013	136,490,212	1,570,810	**1.15%**
	2014	136,490,212	1,701,716	**1.25%**
	2015	136,490,212	1,851,930	**1.36%**
Extension of 2013-2015 Biennial	2016	136,490,212	2,006,014	**1.47%**
2017-2019 Triennial Period	2017	141,120,375	2,632,545	**1.87%**
	2018	141,120,375	1,980,534	**1.40%**
	2019	141,120,375	2,020,149	**1.43%**

As shown in Table 3 above, CenterPoint's first-year energy savings as a percent of retail sales increased from 0.54 percent in 2007 to a high of 1.87 percent in 2017 before falling to its current level of 1.47% percent, a slight increase over 2018. The Department commends CenterPoint for its 2019 CIP performance.

Figure 2 (Company's Graph C-3 on page 17 of its Report) below shows the historical amounts of lifetime energy savings created each year through CenterPoint's customer CIP achievements. Prior to 2019 CenterPoint did not track lifetime energy savings by individual rate classes, so that data is unavailable.

Figure 2: CenterPoint's Lifetime Energy Savings Created Through Annual CIP Achievements



The changes in lifetime energy savings are related to several factors, including;

- the level of first-year energy savings;
- the different lifetimes of the mix of energy savings achieved each year (for example, large commercial and industrial projects generally have longer lifetimes; even if CenterPoint achieved the same first-year energy savings in two years, the lifetime energy savings for CIP achievements associated with one of those years can be higher if that year's achievements have a higher concentration of long lifetime projects); and
- changes in lifetime assumptions between triennial CIPs (*e.g.*, the assumed lifetime for behavioral change projects is lower now than when first introduced).

The third factor makes it difficult to compare changes in lifetime energy savings between triennial CIPs. However, based on the assumptions used at the time for each CIP triennial, CenterPoint's 2019 lifetime energy savings were 98 percent higher than the Company's average lifetime energy savings from 2007 through 2009.

To put CenterPoint's energy savings in context, the Company's average residential customer uses approximately 88.8 Dth per year on average.[3] CenterPoint's 2019 lifetime energy savings were 23.0 million Dth, enough savings to provide natural gas service to almost 260,090 residential customers for a year.

C. HISTORY OF REVENUE COLLECTION AND USE PER CUSTOMER

1. Under/Over Recovery of Revenues

In Attachment D-1 of the 2020 Decoupling Report, CenterPoint included spreadsheets detailing its calculations of the RD Rider adjustments. The adjustments are calculated by comparing the calendar year actual use per customer (UPC), by rate class, with the UPC authorized in CenterPoint's 2017 rate case (Docket No. G008/GR-17-285) for July through December and in the Company's 2019 rate case (Docket No. G008/GR-19-524) for January through June.

Weather conditions during the evaluation period (July 2018 through June 2019) were colder than normal, which resulted in an over-recovery of revenue for all of the Company's rate classes. Table 4 below illustrates these over-recoveries.

Table 4: Calculation of Over (Under Recovery) for Evaluation Period of July 1, 2019, to June 30, 2020

Customer Class	UPC - Actua	UPC Authoriz	Actual Rev/Custo	Authorized Rev/Custo	Non-Gas Margin	YTD Net Under(Over)		10% Cap	Decouplin g Revenue
Residential	89.7	88.8	$306.59	$305.66	$247,044,202	($351,980)	-0.1%	$24,704,420	($351,980)
Com- A	79.4	82.0	$358.72	$364.89	$10,285,517	$191,769	1.9%	$1,028,552	$191,769
Com-Ind B	284.5	296.0	$734.60	$756.07	$15,378,985	$473,413	3.1%	$1,537,899	$473,413
Com-Ind C	1,803.6	1822.0	$3,204.90	$3,238.43	$68,452,950	$950,267	1.4%	$6,845,295	$950,267
SVDF-A	4,551	4,589	$5,695	$5,786	$5,394,616	($41,980)	-0.8%	$539,462	($41,980)
SVDF-B	17,561	17,149	$18,622	$18,263	$3,213,451	($152,494)	-4.7%	$321,345	($152,494)
LVDF - STD	76,603	73,911	$50,637	$49,494	$10,077,607	($269,155)	-2.7%	$1,007,761	($269,155)
LV-Combined	59,937	61,964	$42,778	$44,047	$2,303,635	$104,725	4.5%	$230,363	$104,725

For the 2019-2020 evaluation period, no customer class encountered the 10 percent cap on surcharges.

Table 5 below shows how the decoupling revenues shown in Table 4 above were combined with the under-recovered balance remaining from the third evaluation period (July 2018 through June 2019) to determine the under- and over-recoveries used to calculate the RD factors implemented September 1, 2020.

[3] 88.8 Dth is the Authorized use per customer.

Table 5: CenterPoint's Calculation of RD Factors For RD Rider Pilot Period July 1, 2019-June 30, 2020

Customer Class	Prior Period Balance	Decoupling Revenue	Total	2019 Sales (Dth)	RD Factor ($/Dth)	RD Factor ($/Therm)
Residential	$409,333	($351,980)	$57,353	72,450,155	0.0008	$0.00008
Com- A	($36,908)	$191,769	$154,861	2,372,826	0.0653	$0.00653
Com-Ind B	$15,819	$473,413	$489,232	6,011,470	0.0814	$0.00814
Com-Ind C	$581,776	$950,267	$1,532,043	37,854,491	0.0405	$0.00405
SVDF-A	($143,731)	($41,980)	($185,711)	4,661,628	(0.0398)	($0.00398)
SVDF-B	($130,878)	($152,494)	($283,372)	2,852,530	(0.0993)	($0.00993)
LVDF - STD	$41,107	($269,155)	($228,048)	15,569,178	(0.0146)	($0.00146)
LV- FIRM	$31,881	$104,725	$136,606	3,511,647	0.0389	$0.00389
Total	$768,399	$904,565	$1,672,964	145,283,925		

The Department reviewed CenterPoint's decoupling adjustment calculations and confirms that the Company determined its current adjustment using the Commission-approved method. Thus, the Department recommends that the Commission allow CenterPoint to implement the RD factors shown in Table 6 below.

Table 6: Per-Therm Surcharges/(Refunds) Implemented September 1, 2020

Customer Class	RD Factor ($/Therm)
Residential	$0.00008
Com- A	$0.00653
Com-Ind B	$0.00814
Com-Ind C	$0.00405
SVDF-A	($0.00398)
SVDF-B	($0.00993)
LVDF - STD	($0.00146)
LV- FIRM	$0.00389

Table 7 below shows the average annual surcharge/(refund) expected for each customer class.

Revised Table 7: Annual Surcharge/(Refund) Expected for Average Customer of Each Customer Class

Customer Class	Decoupling Adjustment	Annual Use Per Customer (Therms)[4]	Annual Cost/(Refund)
Residential	$0.00008	900	$0.07
Com- A	$0.00653	828	$5.41
Com-Ind B	$0.00814	3,000	$24.42
Com-Ind C	$0.00405	18,240	$73.87
SVDF-A	($0.00398)	46,800	-$186.26
SVDF-B	($0.00993)	166,800	-$1,656.32
LVDF - STD	($0.00146)	466,800	-$681.53
LV- FIRM	$0.00389	645,600	$2,511.38

Table 8 below shows the revenue decoupling calculations for each of CenterPoint's customer classes for this evaluation period and the previous evaluation period.

Table 8: CenterPoint's Revenue Decoupling Calculations

	2018-2019 Evaluation Plan		2019-2020 Evaluation Plan		
Customer Class	Calculated Surcharge/(Refund)	Surcharge/(Refund) After 10% Surcharge Cap	Calculated Surcharge/(Refund)	Surcharge/(Refund) After 10% Surcharge Cap	2018-2020 Evaluation Period Total
Residential	($13,774,109)	($13,774,109)	($351,980)	($351,980)	($14,126,089)
Com- A	($358,662)	($358,662)	$191,769	$191,769	($166,893)
Com-Ind B	($676,681)	($676,681)	$473,413	$473,413	($203,268)
Com-Ind C	($4,954,043)	($4,954,043)	$950,267	$950,267	($4,003,776)
SVDF-A	($776,992)	($776,992)	($41,980)	($41,980)	($818,972)
SVDF-B	($353,711)	($353,711)	($152,494)	($152,494)	($506,205)
LVDF - STD	$365,444	$365,444	($269,155)	($269,155)	$96,289
LV- FIRM	($98,681)	($98,681)	$104,725	$104,725	$6,044
Total	($20,627,435)	($20,627,435)	$904,565	$904,565	($19,722,870)

[4] Calculated using the Company's provided average monthly use per customer.

A review of Table 8 indicates that over the last two full revenue decoupling periods spanning from July 1, 2018 to June 30, 2020, CenterPoint's RD Rider has resulted in a net refund of $19,722,870.

However, when analyzing the impact of all three decoupling periods, so far CenterPoint's RD Rider has resulted in total net refund of $33,122,872.

III. RECOMMENDATIONS

The Department recommends that the Commission accept CenterPoint's 2020 Decoupling Evaluation Report and approve the revenue decoupling factors shown in Table 9 below (and already implemented by CenterPoint on September 1, 2020).

Table 9: Revenue Decoupling Factors for CenterPoint's Decoupled Customer Classes - Surcharge/(Refund) per Therm

Customer Class	RD Factor ($/Therm)
Residential	$0.00008
Com- A	$0.00653
Com-Ind B	$0.00814
Com-Ind C	$0.00405
SVDF-A	($0.00398)
SVDF-B	($0.00993)
LVDF - STD	($0.00146)
LV- FIRM	$0.00389

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G008/GR-20-704

Dated this **2nd** day of **November 2020**

/s/Sharon Ferguson

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