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COMMISSION STAFF'S PETITION
TO DETERMINE REQUIREMENTS
FOR SMART METER TEXAS

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PUBLIC UTILITY COMMISSION
OF TEXAS

ORDER

This Order addresses Commission Staff's petition to determine requirements for Smart Meter Texas™ (SMT), a web portal by which AEP Texas Inc., CenterPoint Energy Houston Electric, LLC, Oncor Electric Delivery Company LLC, and Texas-New Mexico Power Company (TNMP) make metering data available to customers and others. All issues between the parties were resolved by a settlement agreement, except one, for which the State Office of Administrative Hearings (SOAH) prepared a proposal for decision.

The contested issue related to the maximum time period that a residential customer or smaller commercial customer may grant a competitive services provider (CSP) access to the customer's data maintained by SMT without the customer affirmatively renewing the grant of data access. The term smaller commercial customer is used in this Order to mean a commercial customer whose maximum monthly kilowatt-hours (kWh) for the prior 12 months is less than 15,000 kWh.¹ The term CSP is used in this Order to mean a third party that a retail customer may authorize to have access to that customer's electric-usage data, such as to help manage the customer's electric usage and costs.²

The SOAH administrative law judge (ALJ) recommended that the maximum time period remain 12 months for the reasons discussed in this Order, and the Commission adopts the ALJ's recommendation. However, the Commission does not adopt findings of fact 44 and 46 through 62 because they are unnecessary to decide this issue and, in general, they are not proper findings of fact. The Commission deletes finding of fact 45 because the surrounding findings have been removed, and the content, which defined a term used in the proposal for decision, is included above in this introductory section and is added to finding of fact 42. Additionally, the Commission

¹ Proposal for Decision at ii, 8 (Mar. 14, 2018)

² *Id.* at 2 n.4 (citing to settlement agreement at 2, ¶ I.B., and Att. 1, Business Requirement 1).

corrects finding of fact 14 to accurately reflect which parties filed lists of issues, deletes repetitive language in finding of fact 39, and rephrases finding of fact 41 to reflect more accurately the effect of a settlement agreement in the context of administrative law. The Commission also adds findings of fact 43A through 43G to supply additional procedural history and clarifies findings of fact 40, 42, 66, 69, 79, and 81 and conclusions of law 13 and 14. Further, the Commission modifies finding of fact 82 because the phrasing in the proposal for decision was not proper for a finding of fact. All of the above changes to the proposal for decision are made in accordance with the Texas Administrative Procedure Act.³ The other additions to this Order (i.e., findings of fact 62A through 62J and conclusions of law 14A and 14B) relate to the settlement agreement filed in this docket on January 29, 2018, amended later by the signatories, and modified by this Order.

The Commission approves the business requirements attached to the agreement, as modified by this Order. The Commission also grants a waiver under 16 TAC § 25.130(g)(3) of the requirements of 16 TAC § 25.130(g)(1)(J) with respect to SMT on the basis that there is an adequate substitute for home-area-network (HAN) functionality. That substitute is that AEP Texas, CenterPoint, Oncor, and TNMP have agreed to support HAN technology separately through their advanced metering systems instead of through SMT. The Commission clarifies that the utilities may not discontinue supporting a customer's existing HAN device unless the customer requests that the HAN device be disconnected from the customer's meter. The Commission highlights that the decision to disconnect an existing HAN device from the customer's meter is the customer's choice, not the utility's.

In addition to the changes described above, the Commission makes non-substantive changes to findings of fact and conclusions of law for such matters as capitalization, spelling, punctuation, style, grammar, readability, and consistency.

The Commission adopts the following findings of fact and conclusions of law:

³ Administrative Procedure Act, Tex. Gov't Code Ann. §§ 2001.001–.902 (West 2016 & Supp. 2017) (APA).

I. Findings of Fact

Introduction and Procedural History

1. Smart Meter Texas^{IM} (SMT) is an interoperable, web-based information system that among other things (1) stores retail customers' electric-usage data in increments of 15-minute intervals recorded by advanced meters and (2) via various user interfaces, provides secure access to those data to retail customers, retail electric providers (REPs) of record, other parties that retail customers authorize to have access to their electric-usage data, and the Electric Reliability Council of Texas (ERCOT).
2. SMT was jointly established and is jointly maintained by four transmission and distribution utilities (the utilities): AEP Texas Inc.; CenterPoint Energy Houston Electric, LLC; Oncor Electric Delivery Company LLC; and Texas-New Mexico Power Company (TNMP).
3. The utilities entered into a joint development and operations agreement dated December 31, 2008, to govern the development and use of SMT.
4. On August 16, 2017, Commission Staff filed the petition that initiated this proceeding. The petition requested that the Commission determine what changes, if any, should be made to the business requirements for the continued operation of SMT under the joint development and operations agreement.
5. In Order No. 1 issued on August 18, 2017, a Commission administrative law judge approved Commission Staff's method of notice and set an intervention deadline of September 15, 2017.
6. On August 22, 2017, Commission Staff filed its proof of notice attesting to the provision of notice of the petition by mail on each party that participated in Project Nos. 46204, *Rulemaking Regarding Third Party Authorization to Access Smart Meter Data*, and 46206, *Rulemaking Regarding Governance, Performance, and Funding of Smart Meter Texas*.
7. In Order No. 2 issued on September 13, 2017, a Commission ALJ granted the following parties intervention: Texas Energy Association for Marketers (TEAM); Steering Committee of Cities Served by Oncor (Cities); Oncor; TNMP; and the Office of Public Utility Counsel (OPUC).

8. In Order No. 3 issued on September 25, 2017, a Commission ALJ granted the following parties intervention: AEP Texas; The Energy Professionals Association; CenterPoint; Texas Advanced Energy Business Alliance; Alliance for Retail Markets (ARM); EnerNOC, Inc.; MP2 Energy Texas, LLC; ENGIE Resources, LLC; Mission:data Coalition, Inc.; and Brasovan Energy's Electricity Users Group (BEEC).
9. In Order No. 4 issued on September 29, 2017, a Commission ALJ required the parties to file a joint proposed procedural schedule on or before October 13, 2017.
10. On September 29, 2017, Commission Staff filed an agreed proposed procedural schedule, agreed motion for a protective order, and agreements regarding procedural and discovery matters on behalf of all parties to the proceeding.
11. On September 29, 2017, an order was filed requesting that Commission Staff and any interested party file with the Commission a list of issues to be addressed in this docket by October 13, 2017.
12. In Order No. 5 issued on October 9, 2017, a Commission ALJ issued a protective order to govern the use of confidential materials in this docket.
13. The parties held their first technical conference on October 12, 2017. Before that date, several parties prefiled lists of questions to be discussed at the first technical conference.
14. On October 13, 2017, the following parties filed proposed lists of issues: OPUC, the utilities, ARM, Commission Staff, and the Data Access Coalition (which included the Texas Advanced Energy Business Alliance, The Energy Professionals Association, Mission: data, BEEC, EnerNOC, ENGIE Resources, and MP2 Energy Texas).
15. On October 13, 2017, Commission Staff filed an agreed notification regarding the proposed procedural schedule and regarding procedural and discovery matters on behalf of all parties to the proceeding.
16. In Order No. 6 issued on October 18, 2017, a Commission ALJ adopted certain agreements that were proposed by Commission Staff on behalf of all parties in Commission Staff's September 29, 2017 and October 13, 2017 filings and established a procedural schedule.

17. On October 19, 2017, the following parties filed direct testimony: The Energy Professionals Association, OPUC, EnerNOC, MP2 Energy Texas, the utilities, ARM and TEAM jointly, and ENGIE Resources.
18. On October 19, 2017, the Texas Advanced Energy Business Alliance filed a statement of position, and Oncor filed a statement of position and a request for a good-cause exception.
19. On October 20, 2017, AEP Texas filed a motion to amend the hearing date adopted in Order No. 6 and requested that the hearing be set on December 4 and 5, 2017.
20. The parties held a second technical conference telephonically on October 23, 2017.
21. The parties held a third technical conference on October 26, 2017.
22. On October 26, 2017, the Commission referred this proceeding to the State Office of Administrative Hearings (SOAH).
23. In a preliminary order issued on October 26, 2017, the Commission set forth the issues to be addressed in this docket.
24. In SOAH Order No. 1 issued on October 27, 2017, the SOAH ALJ stated the time, place, and nature of the hearing as well as the legal authority and jurisdiction under which the hearing was to be held, with a reference to the particular sections of the statutes and rules involved. The SOAH ALJ also provided a short, plain statement of the factual matters asserted.
25. On October 30, 2017, Orcutt Enterprises, LLC filed a motion to intervene.
26. On October 31, 2017, BEEC filed direct testimony, and Commission Staff filed a statement of position in lieu of direct testimony.
27. In SOAH Order No. 2 issued on November 13, 2017, the SOAH ALJ granted Orcutt's motion to intervene.
28. On November 14, 2017, the following parties filed rebuttal testimony: OPUC, MP2 Energy Texas, Mission: data, the utilities, The Energy Professionals Association, ARM and TEAM jointly, and EnerNOC.

29. On November 14, 2017, Cities and Commission Staff filed statements of position, and TNMP filed a statement of position and a request for a good-cause exception.
30. On November 15, 2017, BEEC filed rebuttal testimony.
31. On November 21, 2017, Commission Staff filed a notice that the parties had begun settlement discussions and expected that it would be possible to reach an agreement regarding all issues in this proceeding or, at a minimum, to reduce the number of contested issues to be addressed at the hearing on the merits in this proceeding. The notice stated that the parties intended to meet for further settlement discussions on November 27, 2017, and December 1, 2017.
32. On December 4 and 5, 2017, the hearing on the merits was held before the SOAH ALJ.
33. In SOAH Order No. 3 issued on December 11, 2017, the SOAH ALJ set forth post-hearing filing deadlines and requirements and set forth January 19, 2018, as the date the record would close.
34. On December 28, 2017, the parties except Orcutt (the signatories) filed a letter stating that they had reached an uncontested agreement resolving all but one issue in this docket. The letter requested that the SOAH ALJ issue an order suspending the briefing deadlines contained in SOAH Order No. 3 and set the date by which the parties were to file a revised briefing schedule for the one remaining contested issue.
35. In SOAH Order No. 4 issued on December 28, 2017, the SOAH ALJ suspended the post-hearing briefing deadlines contained in SOAH Order No. 3 and set January 5, 2018, as the date by which the parties were to file a proposed revised briefing schedule for the contested issue.
36. On January 5, 2018, the signatories filed a letter proposing a briefing schedule for the contested issue. The letter proposed that initial briefs be due on January 29, 2018, and that reply briefs be due on February 7, 2018.
37. In SOAH Order No. 5 issued on January 9, 2018, the SOAH ALJ adopted the signatories' proposed briefing schedule filed on January 5, 2018, for the contested issue; set January 31, 2018 as the deadline to file redlined decision-point lists and proposed findings

of fact, conclusions of law, and ordering paragraphs regarding that contested issue: and set February 7, 2018, as the date the record would close.

38. On January 11, 2018, the parties submitted a letter indicating their intent to file a settlement agreement and testimony supporting the agreement no later than January 29, 2018, and confirming their understanding that the requirement in SOAH Order No. 5 to file redlined decision-point lists and proposed findings of fact, conclusions of law, and ordering paragraphs by January 31, 2018, pertained solely to the contested issue.
39. On January 29, 2018, the signatories filed a joint motion to admit their settlement agreement, affidavit of notice, and supporting testimony into evidence. In their motion, the signatories also requested a decision on the remaining contested issue, and approval of a proposed order attached to the motion. The settlement agreement, affidavit of notice, and supporting testimony were also attached to the joint motion. Orcutt has not taken a position on the joint motion or the settlement agreement.
40. In SOAH Order No. 6 issued on March 14, 2018, the same day that the SOAH ALJ's proposal for decision was issued, the SOAH ALJ admitted into evidence the following: (a) the settlement agreement; (b) Commission Staff's affidavit attesting to the provision of notice (including attachments); (c) Therese Harris's direct testimony in support of the settlement agreement; (d) Michele Gregg's supplemental direct testimony in support of the settlement agreement; (e) Donny R. Helm's supplemental direct testimony in support of the settlement agreement; (f) Mona Tierney-Lloyd's supplemental direct testimony in support of the settlement agreement; (g) Kevin Boudreaux's supplemental direct testimony in support of the settlement agreement; and (h) John Schatz's supplemental direct testimony in support of the settlement agreement. All of those documents had been filed on January 29, 2018, except for Commission Staff's affidavit regarding notice, which had been filed on August 22, 2017.
41. In SOAH Order No. 6, the SOAH ALJ also remanded to the Commission the settled issues addressed by the settlement agreement.

42. The contested issue is the maximum length of time that a residential customer or a smaller commercial customer (identified as a commercial customer whose maximum monthly kilowatt-hours (kWh) for the prior 12 months is less than 15,000 kWh) can grant a competitive service provider (CSP) access to the customer's SMT data before the customer must affirmatively renew the customer's grant of access for the CSP to continue having access to those data. The term CSP is used in this Order to mean a third party that a retail customer may authorize to have access to that customer's electric-usage data, such as to help manage the customer's electric usage and costs.
43. ARM and TEAM jointly, Cities, OPUC, and Commission Staff filed initial briefs on the contested issue on January 29, 2018, and BEEC filed its initial brief on January 30, 2018. The parties except Orcutt and BEEC filed a joint decision-point list and proposed findings of fact, conclusions of law, and ordering paragraphs regarding the contested issue on January 31, 2018. ARM and TEAM jointly, Cities, and OPUC filed reply briefs on the contested issue on February 7, 2018, and BEEC filed its reply brief on February 8, 2018. The record closed on February 8, 2018.
- 43A. On March 14, 2018, the SOAH ALJ issued a proposal for decision.
- 43B. In exceptions to the proposal for decision that were filed on March 23, 2018, Oncor requested that a finding of fact be corrected to accurately reflect which parties filed initial briefs on the contested issue.
- 43C. On April 3, 2018, the SOAH ALJ adopted Oncor's requested correction to the proposal for decision.
- 43D. The Commission considered this docket at its April 12, 2018 open meeting.
- 43E. On April 19, 2018, Oncor filed a letter to the Commissioners to inform them that the signatories no longer requested either a presumption of reasonableness for costs or language regarding a limitation of liability.
- 43F. On May 2, 2018, the signatories filed a request for a waiver under 16 TAC § 25.130(g)(3) of the requirements of 16 TAC § 25.130(g)(1)(J) with respect to home-area-network (HAN) functionality. The signatories also provided additional supplemental direct

testimony by Donny R. Helm and affidavits by Jerry Young, Esther F. Kent, and Robert K. Roberts, respectively, in support of their request for a waiver.

43G. At its May 10, 2018 open meeting, the Commission opened the record and admitted the second supplemental direct testimony of Donny R. Helm and the affidavits of Jerry Young, Esther F. Kent, and Robert K. Roberts.

The settlement agreement

- 44. DELETED.
- 45. DELETED.
- 46. DELETED.
- 47. DELETED.
- 48. DELETED.
- 49. DELETED.
- 50. DELETED.
- 51. DELETED.
- 52. DELETED.
- 53. DELETED.
- 54. DELETED.
- 55. DELETED.
- 56. DELETED.
- 57. DELETED.
- 58. DELETED.
- 59. DELETED.
- 60. DELETED.
- 61. DELETED.
- 62. DELETED.

- 62A. The signatories agreed to the business requirements that are in attachment 1 to their settlement agreement.
- 62B. The streamlined process by which a customer can share data from SMT with third parties without the customer setting up an account on SMT is an example of how the business requirements attached to the agreement, as modified by this Order, provide for convenient access to customers' advanced-meter data.
- 62C. The following are examples of how the business requirements attached to the agreement, as modified by this Order, provide for secure access to customers' advanced-meter data: (1) requiring a CSP to provide customer-specific information—the Electric Service Identifier ID number, the meter number, the REP of record's certificate number, and a valid email address—to verify that a customer has authorized a CSP to access the customer's data via SMT and (2) the process by which SMT emails a customer and the customer must then affirmatively acknowledge that a CSP is authorized to access the customer's data via SMT.
- 62D. The business requirements that are attached to the settlement agreement, as modified by this Order, provide for convenient and secure access to customers' advanced-meter data.

HAN technology

- 62E. The functionality of on-demand read that would be available on SMT through the revised business requirements attached to the settlement agreement, as modified by this Order, provides an adequate substitute for HAN functionality.
- 62F. If it operates in accordance with the business requirements attached to the settlement agreement, as modified by this Order, SMT provides an adequate substitute for HAN functionality.
- 62G. The signatories agreed that continued HAN functionality would be supported by each utility's advanced metering system and not through SMT.
- 62H. It is appropriate for continued HAN functionality to be supported by each utility's advanced metering system and not through SMT.

- 62I. The utilities' advanced metering systems, as implemented through SMT and the utilities' respective initiatives, are an adequate substitute for HAN functionality.
- 62J. It is not appropriate for the utilities to decide whether or not to disconnect a customer's existing HAN device from the customer's meter.

The contested issue

63. The contested issue is whether the length of time that a CSP can have access to a residential or smaller commercial customer's SMT data without affirmative renewal by the customer should be 12 months or 36 months. The current length of time is 12 months.
64. Because the signatories did not reach an agreement on the contested issue, they requested that the Commission decide it as part of a final order issued in this case.
65. Compared to residential and smaller commercial customers, larger customers are more likely to have energy managers overseeing and managing their electric usage, to understand agreements that govern the sharing of advanced-meter data, and to have the financial and technical ability to pursue legal actions to protect their interests if such agreements are violated.
66. Larger customers typically have energy-service contracts with terms of three to five years, while residential customers typically have energy-service contracts with terms of 12 months or less.
67. Residential and smaller commercial customers require a higher level of customer protection than do larger customers.
68. Transmission and distribution utilities do not maintain a retail customer's name or billing address.
69. Under the SMT 2.0 business requirements attached to the agreement, as modified by this Order, SMT can use only three unique customer identifiers to verify that a customer has authorized sharing the customer's SMT data: the customer's meter number; the Electric Service Identifier ID; and the customer's REP of record.
70. Because of a lack of reliable information, it is difficult for SMT to be certain that a customer originated a request for permission to share the customer's SMT data.

71. Some third parties, including some with internet-protocol (IP) addresses originating outside the continental United States, have circumvented the current SMT verification and confirmation protocols for accessing customer data.
72. Past violations by third parties involving access to SMT data indicate that such data have sufficient value to hackers to pose a risk to customers.
73. SMT has never revoked or suspended an SMT user's right to access data.
74. SMT does not control data-sharing agreements or investigate CSPs before they enter into such agreements with customers; instead, SMT encourages customers to do their own investigation.
75. If the Electric Service Identifier ID, meter number, and REP of record do not change, a CSP can maintain access to SMT data for a customer's premises after the customer who consented to such access moves out. The new occupant might not know about the CSP's access to the data.
76. A customer's REP of record does not need a separate data-sharing agreement to obtain access to the customer's SMT data; it has access to those data as long as it remains the customer's REP of record.
77. When a customer ends a relationship with a REP of record, SMT automatically records a transaction that terminates the former REP of record's access to the customer's data through SMT.
78. A REP that is not the customer's REP of record must meet the same requirements as any other CSP before accessing a customer's data through SMT.
79. Setting a 12-month limit on the length of time that a CSP may access a residential or smaller commercial customer's SMT data without affirmative renewal by the customer provides such a customer a quicker opportunity to re-review the terms and conditions of their data-sharing agreement with a CSP; the CSP's current privacy policies, if any; and customer disclosures that SMT will email to the customer in connection with renewal.

80. Under the SMT 2.0 business requirements, residential customers and smaller commercial customers will be able annually to reaffirm their authorization to share their SMT data with a CSP by a single click in an email.
81. Combined with other SMT 2.0 business requirements, the 12-month limit on the length of time that a CSP may access a residential or smaller commercial customer's SMT data without affirmative renewal by the customer strikes a reasonable balance between protecting such customers and providing a convenient way for them to share their data with CSPs.
82. Twelve months is an appropriate limit on the length of time that a CSP may access a residential or smaller commercial customer's SMT data without affirmative renewal by the customer.

II. Conclusions of Law

1. Each of the utilities is an electric utility as defined by Public Utility Regulatory Act (PURA) § 31.002(6).
2. The Commission has jurisdiction over the utilities and the subject matter of this case. PURA §§ 14.001 and 39.107.
3. SOAH has jurisdiction over matters related to the hearing, including preparation of a proposal for decision with findings of fact and conclusions of law under PURA § 14.053 and Texas Government Code § 2003.049.
4. Commission Staff's provision of notice in this proceeding complies with 16 Texas Administrative Code (TAC) § 22.55.
5. Notice of the hearing was provided in accordance with Texas Government Code §§ 2001.051 and 2001.052 and 16 TAC chapter 22.
6. This docket was processed in accordance with the requirements of PURA, the Texas Administrative Procedure Act, and Commission rules.
7. As the party proposing a change to the SMT 1.0 business requirements, BEEC bears the burden of proof under 1 TAC § 155.427.

8. A customer owns and has a right to maintain as private the customer's advanced-meter data in accordance with PURA §§ 17.004(a)(6), 39.101(a)(2), and 39.107(b).
9. Transmission and distribution utilities are prohibited from selling, sharing, or disclosing advanced-meter data but are required to share a customer's advanced-meter data with a third party for the purpose of providing customer-approved services to the customer under PURA § 39.107(k).
10. Transmission and distribution utilities are required to provide a customer, the customer's REP, and other entities authorized by the customer convenient, secure, read-only access to the customer's advanced-meter data, including meter data used to calculate charges for service, historical load data, and any other proprietary customer information in accordance with 16 TAC § 25.130(j).
11. REPs must hold a certificate from the Commission; aggregators must be registered with the Commission; and if a REP or aggregator violates PURA or Commission rules, the Commission can impose sanctions such as administrative penalties or revocation of the certificate or registration under 16 TAC §§ 25.107(a) and (j) and 25.111(a) and (j).
12. A CSP that is a broker or a consultant is not subject to the customer-protection requirements in PURA § 39.101 and 16 TAC § 25.471(a).
13. The Commission has authority under PURA §§ 14.001, 17.004(a)(6), 39.101(a)(2), and 39.107 to approve an SMT business requirement that establishes a 12-month limit on the length of time that a CSP may access a residential or smaller commercial customer's SMT data without affirmative renewal by the customer.
14. Combined with other SMT 2.0 business requirements, the 12-month limit on the length of time that a CSP may access a residential or smaller commercial customer's SMT data without affirmative renewal by the customer provides convenient and secure access to SMT data under 16 TAC § 25.130(j)(1).
- 14A. The SMT business requirements attached to the agreement, as modified by this Order, provide convenient and secure access to customers' advanced-meter data under 16 TAC § 25.130(j)(1).

- 14B. The utilities' advanced metering systems, as implemented through SMT and the utilities' respective initiatives, are an adequate substitute for HAN functionality on SMT under 16 TAC § 25.130(g)(3).
15. BEEC did not meet its burden to prove that the limit on how long a CSP can access SMT data of a residential customer or a smaller commercial customer without affirmative renewal by the customer should be changed from 12 months to 36 months under PURA § 39.107, 16 TAC § 25.130, and 1 TAC § 155.427.

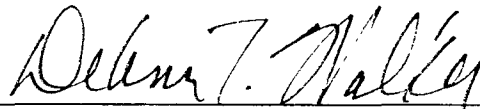
III. Ordering Paragraphs

In accordance with these findings of fact and conclusions of law, the Commission issues the following orders:

1. The Commission approves the business requirements attached to the settlement agreement filed in this docket on January 29, 2018, as modified by this Order.
2. The utilities shall submit an updated list of business requirements for SMT reflecting the changes made by this Order within 60 days of the date of this Order.
3. The Commission grants a waiver to AEP Texas Inc., CenterPoint Energy Houston Electric, LLC, Oncor Electric Delivery Company LLC, and Texas-New Mexico Power Company (TNMP) under 16 TAC § 25.130(g)(3) of the requirements of 16 TAC § 25.130(g)(1)(J) with respect to Smart Meter Texas™.
4. AEP Texas, CenterPoint, Oncor, and TNMP shall continue to support HAN functionality through their respective advanced metering systems.
5. AEP Texas, CenterPoint, Oncor, and TNMP may not disconnect a customer's existing HAN device from the customer's meter unless the customer requests disconnection.
6. Entry of this Order does not indicate the Commission's endorsement or approval of any principle or methodology that may underlie the agreement and shall not be regarded as precedential as to the appropriateness of any principle or methodology underlying the agreement.
7. All other motions and any other requests for entry of specific findings of fact and conclusions of law, if not expressly granted, are denied.

Signed at Austin, Texas the 29th day of May 2018.

PUBLIC UTILITY COMMISSION OF TEXAS



DEANN T. WALKER, CHAIRMAN



ARTHUR C. D'ANDREA, COMMISSIONER

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