Control Number: 51023

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PUBLIC UTILITY COMMISSION OF TEXAS

In re Application of the City of San Antonio, Acting By and Through the City Public Service Board (CPS Energy) To Amend its Certificate of Convenience and Necessity for the Proposed Scenic Loop 138-kV Transmission Line Project in Bexar County, Texas	Docket Number: 51023 SOAH Docket No. 473-21-0247 DIRECT TESTIMONY OF PATRICK CLEVELAND

I, Patrick Cleveland, respectfully submit this Direct Testimony in the above captioned case. In accordance with the procedural schedule in SOAH Order No. 6, which was issued January 6, 2021, the deadline for filing statements of route adequacy is February 17, 2021, therefore this Direct Testimony is filed in a timely manner.

HIGH COUNTRY RANCH INTRODUCTION

1. In the CPS Energy Scenic Loop Project, proposed Routes G1, J1, AA1 and EE include Segment 49a, which goes through High Country Ranch.

2. The High Country Ranch Association (HCR) is comprised of approximately 350 acres of land in the northwest corner of Bexar County, near the Balcones Escarpment. PC Exhibit 3 (HCR Map).

3. HCR is located to the west of the Canyons development, the Anaqua Springs Ranch development and the Pecan Springs development, with many residents of all three enjoying views of the unspoiled valley of HCR.

4. HCR has been in existence for over forty years. The execution of the first Covenants occurred on June 15, 1977, with several amendments over the years. Exhibit 4 (first page of the 2002 Restated Declaration of Covenants describing the makeup of HCR).

5. HCR is comprised of 15 individually owned lots in the northeast corner of the property and approximately 300 acres of common recreation area (plus a nine acre club site tract) wrapping around the southern and western borders of the lots. This recreation area is available to individual lot owners and their families (members) and is used for hiking, bird and wildlife viewing and hunting. In addition, it is used agriculturally for cattle grazing.

6. There are six blinds and eight feeders located throughout HCR. Exhibit 5 (Photo of Feeder and Blind; Taken at Location 1 on the HCR Map looking west). Members are allowed to use any of the blinds on a first come, first serve basis, at all times of the year. A check-in map is present at the head of the trail leading to the recreation area and users are required to raise a red flag and denote on the map where they will be located, so as not to interfere with other members enjoying the land. Exhibit 6 (Photo of check-in station; Taken at Location 2 on the HCR Map). Harvest data of game and non-game animals and birds are collected in a log book located at the check-in station. Members are required to document the age, sex and antler development of any white-tail deer harvested, as well as the age and sex of game birds. In addition, members record the types and numbers of nongame species, whether identified during a hunt or otherwise.

7. An intermittent stream runs through the heart of the property, flowing in a southeast direction into Leon Springs Creek. Exhibit 7 (Photo of stream taken at Location 3 on the HCR Map). Another stream on the western portion of the property flows north. The streams are supplied by rain runoff and numerous springs. A small concrete trough has been built at one spring (unknown date) which holds water continuously throughout each year. Exhibit 8 (Taken at Location 4 on the HCR Map).

8. The elevation of HCR ranges from its highest point at approximately 1700' at the north end to approximately 1,500' at the intermittent stream in the southeast corner of the property. Exhibit 9 (Photo taken at Location 5 on the HCR Map, looking northeast); Exhibit 10 (Photo from Patrick

Cleveland residence looking south taken at Location 6 on the HCR Map; Anaqua Springs Ranch development is in the left background and the existing "Ranchtown to Menger Creek" transmission line is in the right background); Exhibit 11 (Photo looking east with Anaqua Springs Ranch and the Canyons developments in the background taken at Location 7 on the HCR Map). These last photos show the extraordinary views on HCR which are inconsistent with the environmental assessment that claimed "the aesthetic quality of the study area overall is not distinguishable from that of other adjacent areas within the region." Power Engineers Environmental Assessment, pg. 96.

9. An abundance of wildlife is present and/or has been identified at HCR, including White-tail Deer, Axis Deer, Rio Grande Turkey, Feral Hog, Bobcat, Coyote, Fox, Ringtail, Raccoon, and other species. Identified bird species include but are not limited to Painted Bunting, Blue Jays, Brown Jays, Western Scrub Jays, Northern Cardinals, a variety of Hummingbirds, a variety of song birds, Mourning Doves, American Crows, Red Tailed Hawks, Lesser Nighthawks, Whip-poor-wills, Turkey Vultures, Caracaras, Ducks, Owls, and Herons. In addition, the extensive area of mixed Live Oak, Juniper, and deciduous trees along the intermittent stream is considered prime habitat for the endangered Golden Cheeked Warbler per the Diamond report referenced in Power Engineers Environmental Assessment.

10. There are at least two colonies of Red Harvester Ants near the intermittent stream and directly in the path of proposed Segment #49a. PC Exhibit 12 (Photo taken at Location 1 on the HCR Map). These Red Harvester Ants are considered to be the prime diet of the Texas Horned Lizard. The Texas Parks and Wildlife Department has recommended to avoid constructing power lines over Red Harvester Ant colonies in its letter to CPS.

11. Approximately ½ of HCR is covered by native grass and brush and the remainder is covered by Live Oak and Juniper trees. In addition, Mature Black Walnut trees and Little Walnut trees are present along much of the length of the intermittent stream. Exhibit 13 (Photo of Black Walnut tree taken at Location 4 on the HCR Map). Apparently, black walnut trees are not common in Bexar County. PC Exhibit 14 (USDA Map showing Texas counties with Black Walnut trees).

12. A variety of bivalve clam and gastropod fossils from the Upper Glen Rose Formation (lower Cretaceous) have been identified at HCR. PC Exhibit 15 (photo of fossils). These specimens existed over 100 million years ago.

HIGH COUNTRY RANCH HISTORY

13. The northern part of HCR was settled by Francisco Nunez in 1860, who appeared and applied for a land grant, making a sworn statement that he had settled the land on November 6, 1860. PC Exhibit 16 (Image of bona fide settler's certificate). Full records available at https://s3.glo.texas.gov/ncu/SCANDOCS/archives_webfiles/arcmaps/webfiles/landgrants/PDFs/1/5/4/154999.pdf.

14. Mr. Nunez built a house and put stock upon the land, continuously living here until his death in about 1876. *Id.* In 1879, his only heirs received a patent for the land and then sold it. *Id.* The land was then bought and sold several times, becoming a part of a larger ranch consisting of over 2,800 acres.

15. The southern portion of HCR was granted to Simon Montalvo by the Republic of Texas in 1838 and known as Survey No. 418 in Bexar County. PC Exhibit 17 (Image of Survey Field Notes re: Simon Montalvo Grant). Augustin Toutant, brother of famed Civil War General P.G.T. Beauregard, later purchased the land in 1867 and owned it until 1887. PC Exhibit 18 (Image of Deed from F.W. Shaeffer to Augustin Toutant).

16. In 1920, the land was purchased by C.F. Crow and came to be known as the Courtney Crow Ranch for approximately 45 years. PC Exhibits 19-1, 19-2, 19-3 and 19-4 (Images of Crow Deed pages 1-4). In 1965, Agnes Crow deeded the land to her nephews, Roy and Herbert Karsch when it presumably came to be known as the Crow Karsch Ranch. Exhibit 20 (Image of Karsch deed, first page).

17. In the 1970's, the ranch was put up for sale, a tract of which was purchased by Vernon Willoughby. The goal was to create a nature preserve formed under an association in which the owners of 15 lots of land would have an undivided interest in approximately 300 acres of recreational area. In an effort to keep this recreation area intact, the association created restrictions and covenants that ran with the land for 10 years, and thereafter in 10 year increments, also making the requirement that the land could not be partitioned unless 80% of owners agreed. Exhibit 21-1, 21-2, 21-3 and 21-4 (Restrictions and Covenants of the Karsch to Willoughby Deed, pages 1-4). Thus, the 300 acre recreation area of High Country Ranch was created and has been preserved for over forty years.

18. Today, none of the 15 lots at HCR are owned by the original purchasers. My wife and I purchased our lot from Dr. Phillip R. Craven in 2013, who had purchased the same lot from Pat O'Ferrall in 1996. Exhibit 22 (Image of first page of 1996 Craven Deed).

19. Someday, we will sell our lot to someone else who can enjoy the natural wonders of the HCR recreation area, assuming there will be no high towers and electrical lines running through it. On the other hand, allowing Segment 49a will devastate the recreational area and will increase the probability that the High Country Ranch Association members will vote to sell the land for development, whereby the last vestiges of the historic Crow Ranch will be gone forever.

CPS SCENIC LOOP PROJECT

20. Power Engineers' Environmental Assessment ignored a major factor that should be considered: The number of properties actually affected by each of the proposed segments and routes.

21. Although CPS is not required to provide notice of the Application for Convenience and Necessity to owners of adjacent properties unless there is a habitable structure within 300 feet, this does not translate into the premise that adjacent properties are not affected. There is no reasonable scenario where a 130' tall structure would not be visible from an adjacent property

and thus, affect the aesthetics and value of the property if the structure is at or near the property line.

22. For the reasons above, I compiled the identity and number of properties that each proposed segment would be situated on as well as the identity and number of properties adjacent to the proposed segment (within 300 feet). Exhibit 23 (spreadsheet entitled Segments with CPS Landowner Designations). I did not consider a property to be adjacent to the proposed segment if there was any buffer (roads or other property), between the properties, unless there was a habitable structure present within 300 feet, then roads and other properties were disregarded. I did not count public roads or roads owned by associations as adjacent properties.

23. The method of counting the properties was to start from the existing transmission lines on the western border of the proposed area and identify each property that the proposed segment was on and each property that was adjacent to such segment. If a property was counted in the segment, it was not double counted in the next segment that it connected with. So, for example, if Segment 42a ends on Property B009 and connects to Segment 36, which is also on Property B009, the property was only counted once and not counted again as part of Segment 36. As another example, below is a portion of the spreadsheet:

42a	On	B007 (c46, 46a)				A086	B041	B043	B009
	Adjacent	B002	B001	B040	B010 (ca36)				

24. This shows that Segment 42a is on Property B007 but it has been counted in Segment 46 and 46a as well (denoted by (c46, 46a)). In addition, Segment 42a is on properties A086, B041, B043 and B009 and adjacent to properties B002, B001, B040, B042 and B010. Since Segment 36 is on B010, I did not count the B010 property as being adjacent to Segment 42a. This is noted as "counted after" on Segment 36 denoted as (ca36). Thus, the total number of properties affected by Segment 42a is eight when not connected to Segment 36. The total number of properties affected by Segment 42a is seven if connected to Segment 36.

25. This data was then used to calculate the number of properties affected by each route. Exhibit 24 (spreadsheet entitled Alternative Routes and Properties Affected). For example, the proposed segments in Route A are located on 36 properties with 87 properties adjacent to those segments in Route A, for a total of 123 properties affected.

26. There are some routes that, for unknown reasons, were simply not identified by CPS, though all of the segments in these routes are part of the proposed plan and were properly noticed. For example, starting from the west, Route U contains Segments 45, 52, 53, 39, 38, 26, 15, and 50 before ending at Substation 6. However, there is another possible route to Substation 7 which would be Segments 45, 52, 53, 39, 38, 37, 25, 21, and 54. I've identified this route as FF. Another route unidentified by CPS Energy would utilize Segments 44, 39, 38, 37, 25, 21, 54 to Substation 7. I've identified this route as GG, which is shorter in length than 15 other routes proposed by CPS Energy.

27. Based on the above compilations, the ten most favorable routes, in which the least amount of properties are affected, are as follows:

Segment	Prop's. Affected (On and Adjacent)	Number of Prop's. Segments On
1. P	44	21
2. GG	50	21
3. BB	51	19
4. Q1	51	22
5. FF	52	23
6. R1	52	20
7. U1	53	24
8. N1	62	23
9. F1	66	25
10. S	66	32

28. These top ten routes were then sorted according to the total length of ROW NOT following roads or property lines (the lower the number, the more favorable the route) as follows:

Route	Length NOT following roads/property lines
1. P	1.42
2. BB	1.43
3. GG	1.46
4. F1	1.69
5. N1	1.69
6. R1	1.7
7. Q1	1.73
8. FF	2.36
9. U1	2.62
10. S	3.42

Thus, Route P is the most favorable route and Route S is the least favorable route.

29. Finally, the routes were sorted according to the Number of Habitable Structures Affected as follows:

Route	Number
1. Q1	6
2. U1	6
3. R1	7
4. N1	11
5. F1	12
6. P	12
7. BB	24
8. GG	24
9. FF	24
10. S	25

Thus, Route Q1 is the most favorable route and Route S is the least favorable route.

30. If the most favorable route is based on the least number of habitable structures impacted, then clearly Routes Q1, U1 and R1 are far better than any of the other routes.

31. Route P should also be a highly favored route as it has the lowest number of properties affected (44), the lowest length that does not follow roadways or property lines (1.42), and the fifth lowest number of habitable structures (12).

32. Compare the above data to routes that include Segment 49a:

Route	Prop's. Affect.	Length NOT Roads/Prop.	Habitable Structures
AA1	70	2.1	30
EE	71	2.18	31
G1	95	2.89	52
J1	87	2.42	41

33. As can be seen above, Routes AA1, EE, G1 and J1 are all outside the top ten routes described earlier with respect to properties affected and habitable structures. In addition, there are seven more favorable routes than AA1 and EE with respect to length not following roads and property lines. Finally, none of these routes (AA1, EE, GG, J1) are in the top ten when all routes in the study area are ranked with respect to habitable structures.

34. With respect to percentage of a route that follows ROW, Route AA1, EE and J1 have 56%, while Route G1 has 53%. There is only one route that has less percentage of ROW (Route S at 49%) In other words, with respect to percentage of ROW, Routes AA1, EE, G1 and J1 are the least favorable routes out of all the routes in the entire study area (except Route S).

35. The above process was then repeated with different parameters. This time, however, all properties within 300 feet were counted as being adjacent, regardless of roads or other property buffers being in between. But, public roads and roads owned by associations were still not counted as being adjacent. See PC Exhibit 25 (Segments with CPS Landowner Designations 300) and PC Exhibit 26 (Alternative Routes and Properties Affected 300). This resulted in a few minor changes with respect to ranking.

36. Based on this new parameter described in the preceding paragraph, the ten most favorable routes, in which the least amount of properties are affected are as follows:

1. P	60
2. GG	61
3. FF	63
4. BB	64
5. Q1	72
6. U1	74
7. R1	75
8. L	77
9. K	80
10. AA1	81

As can be seen, even with this new parameter, there are still nine routes more favorable than Route AA1 with respect to properties affected.

37. All of the routes were sorted by the environmental categories in the EA. PC Exhibit 27 (Environmental Data from EA with Sorts). The categories that were insignificant were not included. The insignificant categories are those where all the routes are zero or range from 0-2. Based on this sort, the rank of the routes (in order of most favorable) that include Segment 49a are as follows:

	AA1	EE	G1	J1
Length	5	7	22	15
Habitable Structs.	11	13	26	21
Total Length ROW	31	30	23	29
Percent Length ROW	27	28	30	29
Pasture	14	29	19	21
Woodlands/Brush	6	2	21	10
Wells	11	3	28	23
GCW High	8	15	20	16
GCW Low	16	15	29	17

Stream Crossings	21	13	14	22
Streams Parallel	22	8	23	24
Edwards Aquifer	5	7	22	15
100 yr. Flood Plain	26	16	23	27
Cultural Sites 1000ft	11	17	18	20
Archeologic	26	10	14	25

As can be seen from above, Route G1 is never in the top 10 of any category. Route J1 is 10th for one category. Routes AA1 and EE1 break into the top ten in four and five categories respectively. However, Routes AA1, EE, GG and J1 are never the most favorable route in any category.

38. On the other hand, the routes in the top ten list described in paragraph 27 rank in the top ten most favorable routes in the following number of environmental categories:

P	9
BB	9
R1	5
Q1	5
U1	5
K	4
L	3

Thus, Route P continues to be a highly favorable route.

39. The Routes including Segment 49a may be artificially favored due to the donation of ROW by Pinson Interests, et. al., but even if the properties being donated and/or made available in Segments 42a, 46 and 46a are subtracted, the number of easements required (derived from the number of properties the segments are on) for each route is as follows:

AA1	35
EE	36
G1	34

J1 43

As can be seen, the number of easements required to be obtained by CPS Energy in Routes AA1, EE, G1 and J1 (even after subtracting the properties donated) is still higher than the number of easements required in the top ten most favorable routes discussed in paragraph 27.

40. With respect to the donated ROW by Pinson Interests, et. al., the savings in cost will be at the expense of those who own habitable structures within 300 feet of the segments in the study area. According to CPS Energy, Route AA1 is the least expensive route, presumably due to the donated land. The following table shows the difference in cost between other routes and AA1, as well as habitable structures and properties affected:

Route	Addit'l Cost	Habitable Structs.	Total Prop's Affected
DD	$705,371	32	81
Z1	$183,199	30	80
BB	$4,450,082	24	51
P	$5,117,170	12	44
R1	$5,231,286	7	52
Q1	$7,599,343	6	51

41. Compare this data to Route AA1 and Route EE:

Route	Addit'l. Cost	Habitable Structs.	Total Prop's. Affected
AA1	---	30	70
EE	$1,465,863	31	71

42. As can be seen above, Route R1 has only 7 habitable structures within 300 feet of the segments, while Route AA1 has 30. Also, Route R1 affects 52 properties, while Route AA1 affects 70. In total, Route AA1 affects 23 more habitable structures and 18 more properties than Route R1. Thus, although Route R1 costs $5,231,286 more, this is a small fraction to pay for disturbing less habitable structures and properties, especially for a company that had $2.6 billion dollars in revenue and spent $749,000,000 in new construction last year. CPS Energy Annual

Report, available at https://www.cpsenergy.com/content/dam/corporate/en/Documents/Finance/2019-2020-AnnualReport.pdf

Route R1 is also less expensive than 22 other routes with a cost savings of $12,671,845 over the most expensive route. In addition, Route P is a favorable route because it costs even less than Route R1.

43. Route Z (now denoted as Z1) was CPS' original preferred route because it was the shortest. Route Z1 goes through HCR on the northern property line. I'm not advocating for this route, but at least it follows the northern property line, which is better than fragmenting the recreational area. In Route Z1, there are a slightly above average number of properties affected (80) (the average number of properties affected in the entire study area for the routes is 79) and the number of habitable structures is 30, which would place Route Z1 tied in the 13th most favorable position with Route AA1. In addition, Route Z1 has the shortest length (4.53 miles).

44. At the time of this writing, Texas Parks and Wildlife (TPWD) has yet to recommend a route in response to CPS Energy's amended application. However, before the amendment, TPWD had inexplicably recommended Route AA (now designated as AA1) as the preferred route—a decision based on Power Engineers' Environmental Assessment and no independent field research. See TPWD Correction, filed 9/16/20. The basis of this recommendation was that Route AA:

- "is the fourth shortest route of the 29 alternative routes at 4.77 miles (Route Z was the shortest at 4.58 miles);
- is the fourth shortest route across upland woodlands/bushlands at 3.77 miles (Route Z was the shortest at 3.59);
- has a relatively high percentage of ROW parallel to other existing ROW at 39% (Route Y has the highest percentage at 58%, Route T has the lowest at 9%);
- is tied with Route J as having the fifth least amount of area of ROW across Golden-Cheeked Warbler modeled habitat designated as 3-Moderate High and 4-High Quality, at 7.39 acres.

- is located almost entirely in Karst Zone 5, defined as cavernous and non-cavernous areas that do not contain endangered karst invertebrate species. Approximately 650 feet of the west end of the 4.77-mile long route occurs in Karst Zone 3, defined as areas that probably do not contain endangered karst species."

45a. **Every criterion above that was relied upon by TPWD in their recommendation proved that Route Z should have been more favorable than Route AA** (except one—Golden Cheeked Warbler habitat).

45b. With respect to length, TPWD admitted that Route Z was shorter, and this is still the case with respect to amended routes Z1 and AA1.

45c. With respect to length across woodlands/bushlands, TPWD admitted that Route Z was less, and this is still the case with respect to amended routes Z1 and AA1.

45d. With respect to ROW, TPWD contended that Route AA had a relatively high percentage of ROW, but the numbers cited did not match the numbers in Power Engineers' Environmental Assessment. According to the EA, Route Z had 3.18 miles of ROW (69%) while Route AA had 2.19 miles of ROW (46%), which favors Route Z over Route AA. In the amended routes, Route Z1 is still more favorable as it has 3.09 miles of ROW and Route AA1 has 2.72 miles of ROW.

45e. With respect to Golden Cheeked Warbler habitat, Route Z barely edged out Route AA with 9.47 acres to 7.39 acres, but amended Route Z1 has less total acreage of both categories of habitat at 22.14 acres while Route AA1 has 24.16 acres.

45f. If Route Z1 was changed so that it included Segment 46 (instead of 46a), then the only difference between Route Z1 and Route AA1 is the most western segment, 46b in Route Z1 and 49a in Route AA1. The total Golden Cheeked Warbler habitat for segment 46b in Route Z1 is 5.11 acres. The total GCW habitat for segment 49a in Route AA1 is 8.59 acres. Clearly, Route AA1 is less favorable than Route Z1 with respect to Golden Cheeked Warbler habitat.

45g. With respect to Karst Invertebrate Zones, Route AA had 650' of Karst Zone 3, whereas Route Z was entirely within Karst Zone 5, which favored Route Z. Amended Routes Z1 and AA1 have not changed with respect to this.

45h. Finally, the length of ROW parallel to streams and across the Edwards Aquifer Contributing Zone, both favor Route Z1 over Route AA1.

45i. Based on the above information, TPWD clearly had no legitimate basis to favor Route AA over Route Z (or any other route for that matter), and there is still no legitimate basis to favor Route AA1 over Route Z1.

46a. Routes AA1, EE, G1 and J1 include Segment 49a, which dissects and fragments High Country Ranch. These routes are unfavorable under PURA § 37.056 with respect to community values, recreational and park areas, historical and aesthetic values and environmental integrity as follows:

46b. **First, Segment 49a is the only segment in the entire study area that goes through a recreational area (HCR)**, which Power Engineers failed to identify in their Environmental Assessment. Power Engineers also willfully ignored this fact in the Amended Application after admitting that they were aware of the allegation during the Route Adequacy Hearing on December 10, 2020. In addition, Power Engineers admitted that they didn't attempt to contact Patrick Cleveland or the Secretary of HCR listed on the Bexar County Tax Records in an effort to identify whether HCR was a recreation area.

46c. Second, with respect to aesthetic values, at least three housing developments enjoy views of the unspoiled recreational area of HCR: The Canyons, Anaqua Springs and Pecan Springs. See PC Exhibit 11 showing the developments in the background.

46d. Third, with respect to the environment, the entirety of Segment 49a fragments intact land, which goes directly against TPWD's admonition in its Recommendation Letter to the PUC that "the State's long-term interests are best served when new utility lines and pipelines are sited

where possible in or adjacent to existing utility corridors, roads, or rail lines instead of fragmenting intact lands."

46e. Fourth, the western portion of Segment 49a fragments HCR instead of following the southern property line which goes against 16 Tex. Admin. Code § 25.101 with respect to routes following existing rights of way, including roads and property lines.

46f. Fifth, Route AA1, G1 and J1 include proposed Segment 42a, which is 280 feet from an outdoor play area at Dr. Sara McAndrew Elementary School. See CPS Energy's Response to Patrick Cleveland's First Request for Information.

46g. Sixth, Segment 49a will significantly impact hunting and wildlife viewing as it fragments the HCR recreational area. In addition, it is directly over one blind and within approximately 62' of another.

47. Finally, I continue my objection over the adequacy of the proposed routes as it is apparent that CPS Energy's strategy in proposing segments was to ignore 16 Tex. Admin. Code § 25.101 with respect to following existing rights of way, including roads and property lines and instead, propose segments that fragment intact land. This is most obvious in the previous segment 49 and existing segments 49a, 43 and 44. This strategy appears to be designed to pressure land owners to negotiate with CPS Energy and grant ROW so that the proposed segments would not fragment the land. And of course, it worked for Pinson Interests, et. al.. The fact that CPS Energy so readily agreed to move the segments after Pinson Interests, et. al. donated land along the norther property line of the property identified as B004 shows that their only concern has been, and still is, cost. If CPS Energy had followed 16 Tex. Admin. Code § 25.101 in the first place and proposed the segment along the norther property line, there would have been no incentive for Pinson Interests, et. al. to donate land. I ask that you do not reward CPS Energy for such strategy.

PRAYER FOR RELIEF

WHEREFORE, for the above reasons, I, Patrick Cleveland, respectfully request that the Administrative Law Judges avoid choosing Routes AA1, EE, G1 and J1 and choose routes that affect less properties, less habitable structures and those that impact the environment less.

Dated this 15th day of February, 2021.

/Patrick Cleveland/

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CERTIFICATE OF SERVICE

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on February 15th, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/Patrick Cleveland/

Patrick Cleveland