Exhibit No.: Issue: Reliability, Storm Reserve Witness: Bruce Akin Type of Exhibit: Direct Testimony Sponsoring Party: Evergy Missouri West Case No.: ER-2022-0130 Date Testimony Prepared: January 7, 2022

#### MISSOURI PUBLIC SERVICE COMMISSION

#### CASE NOS.: ER-2022-0130

#### **DIRECT TESTIMONY**

#### OF

#### **BRUCE AKIN**

#### **ON BEHALF OF**

#### **EVERGY MISSOURI WEST**

Kansas City, Missouri January 2022

#### **DIRECT TESTIMONY**

#### OF

#### **BRUCE AKIN**

#### Case No. ER-2022-0130

- 1 Q: Please state your name and business address.
- 2 A: My name is Bruce Akin. My business address is 818 S. Kansas Avenue, Topeka,
  3 Kansas.
- 4 Q: By whom and in what capacity are you employed?
- A: I am employed by Evergy Metro, Inc. I serve as Vice President, Transmission
  and Distribution ("T&D") for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro
  ("Evergy Missouri Metro"), Evergy Missouri West, Inc. d/b/a Evergy Missouri
  West ("Evergy Missouri West"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro
  ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy South,
  Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central") the
  operating utilities of Evergy, Inc.
- 12 Q: Who are you testifying for?

A: I am testifying on behalf of Evergy Missouri West. I will refer to Evergy Missouri
Metro and Evergy Missouri West collectively as "Company" or "Evergy" in my
testimony.

16 Q: What are your responsibilities?

17 A: I am responsible for oversite of construction, operation, and maintenance
18 functions for T&D throughout all of Evergy's jurisdictional territories including

the execution of T&D projects identified as part of Evergy's capital plan, as well
 as all customer outage restoration field activities.

#### 3 Q: Please describe your education, experience and employment history.

- A: I received a Bachelor of Business Administration degree with a major in
  Accounting from Washburn University in 1987 and a Master's Degree in
  Business Administration in 1998. I have worked for Evergy, including one of its
  predecessors, Westar Energy, for 34 years with broad experience across many
  functions in both administrative areas and utility operations. My present position
  is Vice President, Transmission and Distribution, which includes responsibility
  for all transmission, substation and distribution plant and operations.
- 11 Q: Have you previously testified in a proceeding at the Missouri Public Service
  12 Commission ("MPSC" or "Commission") or before any other utility
  13 regulatory agency?
- 14 A: Yes, I have previously testified before the MPSC and the Corporation
  15 Commission for the State of Kansas ("KCC").
- 16 Q: What is the purpose of your testimony?

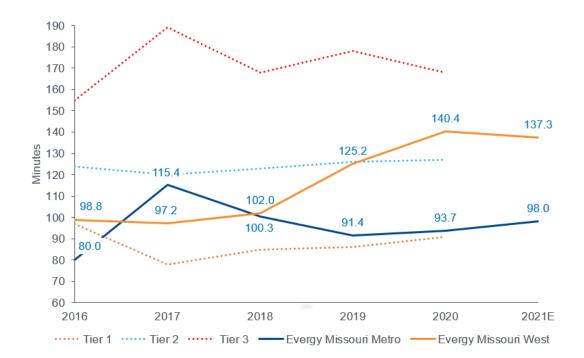
A: I will discuss the current state of Evergy's T&D infrastructure and reliability
performance. Then I will describe Evergy's processes to prioritize and execute
T&D capital improvement projects along with anticipated benefits that customers
can expect to receive. I will also discuss the benefits of establishing a storm
reserve.

#### 1 Q: How is Evergy's T&D system currently performing?

A: From a reliability metric perspective, Evergy and the companies that formed
Evergy have a track record of solid performance. Figure 1 illustrates consistent
reliability performance within Tier 2 of peer utilities based on System Average
Interruption Duration Index ("SAIDI"). SAIDI averages the total of all customer
interruption durations across the total number of customers served and is the most
common reliability indicator used in the electric utility industry.

8

Figure 1 – Historical IEEE Normalized SAIDI Comparison



9

#### 10 Q: What drives reliability performance?

A: There are a number of factors. The largest factors include weather, vegetation
management, age and asset condition, and response time. While we cannot
control the weather, through proper vegetation and asset management, along with
limiting the duration of outage events, we can attempt to mitigate the impact of
weather and other causes of outages on our system.

1

#### **Q:** Describe Evergy's vegetation management strategy.

2 A: In the broadest sense, Evergy's vegetation management strategy is one of 3 continual improvement through a proactive focus on reliability, safety, 4 productivity, and regulatory compliance. We deploy program strategies centrally 5 and tailor our approach based on regional variation across the service territory. 6 Management decisions are informed through extensive data collection specific to 7 vegetation conditions as part of our circuit assessments and trimming operations; 8 allowing us to optimize key elements of the program such as workload, labor 9 needs, finances, customer impact, etc. on a year over year basis. Additionally, the 10 data collection allows for analyses of contract labor productivity and efficiency 11 that we utilize for performance-based incentives and penalties.

What sort of improvements have recently been made to vegetation

### 13

**Q**:

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### management at Evergy?

14 A: Two recent examples of programmatic improvements specific to vegetation 15 management are the deployment of a digital, geospatially based work 16 management software in 2020, and the completion of a large data analytics 17 project focused on vegetation outage risk modeling. This work management 18 software allows for more precise and granular data capture as well as a move to a 19 paperless work stream. The vegetation risk modeling project resulted in 20 vegetation induced outage risk scores at the circuit and sub-circuit level across the 21 distribution network. It is our aim to refine existing vegetation assessments and 22 trimming operations by combining the geospatial capabilities of the work 23 management software with risk mapping produced in the data analytics project.

## Q: Have Evergy Missouri Metro and Evergy Missouri West opted into Plant In Service Accounting ("PISA")?

A: Yes. After the legislature passed Senate Bill 564 on May 16, 2018 (signed by
Governor June 1, 2018), Evergy Missouri Metro and Evergy Missouri West filed
to adopt PISA on December 31, 2018. We have been actively investing in our
system with a focus on reliability and grid modernization under capital investment
plans that have been provided to stakeholders and the Commission annually in
February with our latest capital investment plan filed on February 26, 2021.

9 Q: Please provide summarizing comments regarding your team's processes and
10 approach to capital asset management planning?

11 A: We take seriously our obligation to be good stewards of customer dollars in 12 strategically investing in our system to provide the safe and reliable service our 13 customers deserve and expect. With that in mind, I will describe in more detail 14 below a significant number of targeted programmatic system investment areas and 15 the range of benefits they provide. I will also describe our process for evaluating 16 prioritizing specific project investments beyond the programmatic and 17 investments. Our objectives are to invest the right dollars, in the right assets at 18 the right time through data and experience driven analysis to achieve optimal 19 outcomes for reliability, resiliency and customer experience.

1 Q: Why are T&D capital investments in the public interest and necessary in
2 addition to effective vegetation management practices?

- A: A safe, reliable electric system is expected by our customers and stakeholders. As
  the electric system ages, modern upgrades and improved grid resiliency need to
  be built into the system to meet those expectations.
- 6 Q: What is grid resiliency?

A: Grid resiliency refers to a utility's ability to recover quickly from damage, when it
does inevitably occur. "Resiliency measures do not prevent damage; rather they
enable facilities to continue operating despite damage and/or promote a rapid
return to normal operations." Edison Electric Institute, "Before and After the
Storm" (January 2013).

- 12 Q: What is system hardening?
- A: System hardening refers to replacing assets with those that are more likely towithstand major storm impacts such as high wind or ice accumulation.

### 15 Q: What are some types of equipment typically used for system hardening and16 grid resiliency?

A: There is a range of investments; everything from simply replacing existing
obsolete equipment with equipment built to modern standards, to upgrading
switches for automation with real time intelligence that communicate condition
and circumstances. A one-size-fits-all solution does not exist. What we deploy
depends on the circuit, the load, the number of customers served by it, and the
nature of the service they are taking.

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#### What is Evergy's asset management strategy?

2 A: Evergy's asset management strategy is focused on identification of high impact 3 assets that can be maintained or replaced prior to failure to minimize or prevent 4 customer outages. Ranking methodologies have been developed based on data 5 and analytics to support the identification of lines, circuits, laterals, substations, 6 and individual assets at risk. These methodologies utilize asset data - such as age 7 and manufacturer model; asset condition data - from inspections and testing; 8 historical outage information; and various other inputs. The risk scores are used 9 to prioritize individual asset replacement and as an input to prioritize larger 10 capital projects.

11

#### Q: What types of asset management programs exist for distribution assets?

A: Within Distribution there are multiple programs that support our assetmanagement strategy.

14 The Lateral Improvement Program targets aging infrastructure, excessive 15 lateral outage events, and customer complaints generated from these 16 In 2019, a risk-based investment model (AssetLens) was events. 17 developed to identify overhead distribution primary conductor and poles 18 for replacement in Missouri. The model uses several sources of data, 19 including asset characteristics, asset condition, and historical outage 20 information. In 2021, the risk-based investment model was expanded to 21 include underground and network equipment across all areas.

The Wood Pole Life Extension and Replacement Program is a capital
 program focused on wood pole replacement or pole reinforcement based

on the results from the annual intrusive wood pole inspections. These
inspections are required per the MPSC on a 12-year cycle. The intrusive
inspection includes ground line inspection via soil excavation, bore/plug,
and chemical treatment. This program improves the reliability and
resiliency of our system by replacing or reinforcing poles at an increased
risk of failure.

7 The Proactive Cable Replacement/Rehabilitation Program targets direct 8 buried underground residential distribution ("URD") primary cables that 9 are shown to have elevated risk of failure based on historical cable failure 10 analysis. The program targets high risk URD cables which are identified 11 based on age, condition, performance among other factors. High risk cable 12 segments are evaluated using partial discharge testing to determine the 13 cable's condition. Based upon the results of these tests, cable segments 14 are selected to be replaced. Replacement of these cable segments prevents 15 failures on the system and reduces customer outage minutes.

- The Manhole Vault Top Replacement Program focuses on degraded
   underground manhole ceilings identified during the detailed manhole
   inspections. The manholes are inspected on an 8-year cycle as mandated
   in Missouri by the MPSC. Replacement of these manhole vault tops
   prevents damage to installed underground electrical equipment and
   reduces public safety concerns.
- The Network Rehabilitation Program uses Evergy craft knowledge and
   results from the detailed manhole inspections mandated in Missouri by the

MPSC to identify structures for replacement or remediation. Evergy uses
 an independent contractor who is an expert in manhole restoration and
 high-voltage electrical repairs. The work is prioritized based on greatest
 risk to worker/public safety and impact to customer reliability.

- 5 The High Outage Count Customers Program, also known as the "Worst Performing Circuit" Program, is a circuit-based program addressing 6 7 service reliability issues associated with customers experiencing 8 abnormally high outage counts, based upon MPSC regulatory standards. 9 Evergy identifies high outage count customers, investigates their outage 10 events, and develops solutions to improve their circuit reliability. 11 Analyzing annual outage management system records and field ultrasound 12 inspection results assists in understanding root causes and the ensuing 13 action required to mitigate future incidents.
- The CEMI Improvement Program focuses on making repairs and improvements for customers experiencing 6 or more interruptions over a 16 12-month period. Interruption cause code data is analyzed to determine 17 the root causes and appropriate corrective actions required to mitigate 18 future incidents. This program was developed and rolled out in 2021 in 19 the Missouri jurisdictions.
- The Feeder Improvement Program is a new program starting in 2022.
   This program will target feeder segments identified as being high risk
   through data driven tools like AssetLens. Corrective actions that will be
   considered will include undergrounding, rebuilding and reconductoring.

#### 1 Q: What types of asset management programs exist for substation assets?

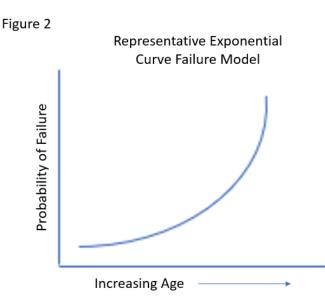
2 A: Our substation asset management strategy is focused on the key asset types of 3 transformers, breakers, and station batteries. For each of these asset types, unique 4 risk scores have been developed based on inspection data, testing data, asset 5 characteristics, and criticality information. As an example, for substation 6 transformers the risk score is primarily driven on dissolved gas test results and 7 trends identified over multiple test results. Specific gases monitored include 8 acetylene, methane, hydrogen, and the carbon dioxide to carbon monoxide ratio. 9 These risk scores are used to identify assets at increased risk of failure. The 10 identified assets are evaluated and prioritized for replacement. Replacement of 11 these assets prior to failure minimizes or eliminates potential outages to 12 customers.

#### 13 Q: What types of asset management programs exist for Transmission assets?

14 A: There is separate program for wood pole inspections that is very similar to the15 program for distribution poles.

### 16 Q: How does asset age factor into the previously mentioned asset management 17 programs?

A: Expected asset lives are gathered from a variety of industry sources and input in
the asset management programs. A common characteristic of all asset classes is
that as they age the rate of failure increases dramatically at a nearly exponential
rate. An example of this 'hockey stick' failure curve can be seen in figure 2.





#### 2 Q: What can be learned from the failure curves of various asset classes?

A: To prevent reliability issues associated with aging infrastructure we should
replace assets at a pace that stays ahead of the failure curve of each respective
asset.

# 6 Q: Have historical asset replacement levels been adequate to address system 7 needs related to aging infrastructure?

8 A: No. In Missouri, the pace of replacement of aging assets was not keeping up as
9 evidenced by the two tables below which show the average age for major assets
10 for T&D and compared to expected life of such assets.

Key Asset Types	,	ge Age ars)	Expected Life (years)
	MO West	MO Metro	
Wood Poles	44	43	40-45
Overhead Conductor	39	34	50
Substation Transformer - Non-LTC	31	42	45-50
Circuit Breakers - Air	41	43	40
Circuit Breakers - Oil	52	54	40

#### Table 1 - Transmission Assets Age Comparison

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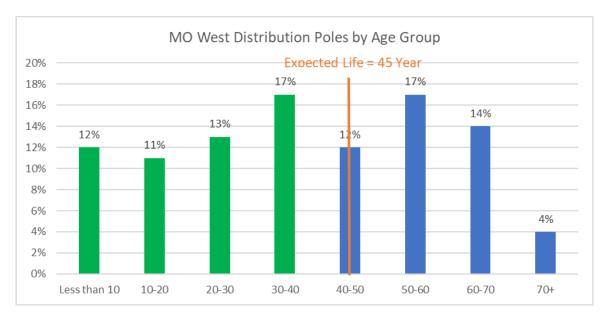
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#### Table 2 - Distribution Assets Age Comparison

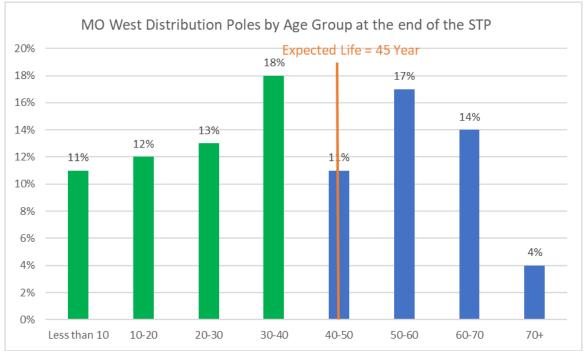
Key Asset Types	Averaç (ye	Expected Life	
	MO West	MO Metro	(years)
Overhead Conductors	38	37	30
Underground Conductors	29	22	30
Poles	37	39	40-45
Line Transformers	35	34	20
Padmount Transformers	33	25	20

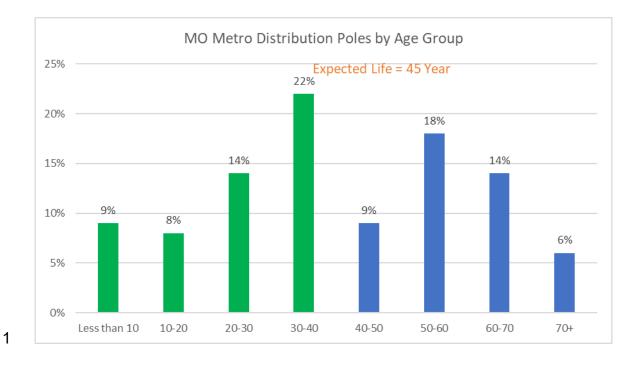
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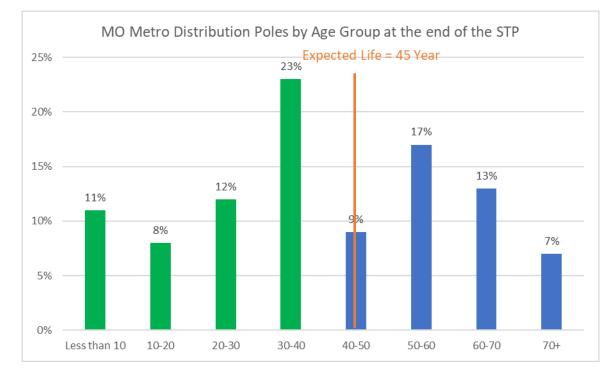
5 What the table above shows is that the average age of assets is nearing or 6 exceeding expected life of such assets. Currently, approximately 47% of Evergy 7 Missouri Wests's and 47% Evergy Missouri Metro's distribution poles are either 8 nearing or exceeding their expected useful life. We expect the rate to drop to 46% 9 by the end of 2024 as shown in the figures below.











Q: Have customers benefitted from the historical asset replacement levels in
 Missouri by deferring asset replacements?

A: Yes, previous replacement levels have benefited customer rates by forestalling
needed investments at some expense of reliability. However, the backlog of asset
replacements is not sustainable at previous levels without a much larger negative
impact on customer reliability as failure curves tend to increase exponentially
over time.

### 8 Q: Will replacing aging infrastructure have a direct impact on reliability 9 performance?

A: Yes, it will have a direct reliability impact on circuits or sections of the grid where
work occurs, but it will not necessarily be reflected in a system-wide decrease of
outage minutes experienced until we are much further down the road with our
asset replacement programs. The majority of the benefit from asset replacements
is to prevent future outages from happening that are not currently occurring on the
system by replacing the assets right before the end of their useful life.

### 16 Q: What other types of capital investments is Evergy implementing to improve 17 system performance?

A: In addition to programmatic asset replacement system improvements, specific
 projects are also prioritized and budgeted which focus on increasing system
 resiliency through: the addition of contingency options, ensuring sufficient
 capacity to meet expected future loads, and implementation of automation and
 communicating devices. These specific projects often also include replacement of
 aged assets, but do so as part of a larger, geographically-targeted project (as

opposed to programmatic asset replacement which is prioritized across the service
 territory).

## 3 Q: How are these specific projects prioritized as part of Evergy's budgeting 4 process?

A: As mentioned above, these projects can have a variety of potential benefits, from
improving system resiliency through the addition of contingency options to
replacing aged assets. As a result, these projects are scored across several
differently weighted value dimensions to create an overall score which can be
used to gauge the relative benefits provided by various multi-faceted projects.
The benefits categories used in calculating these scores are outlined below:

- Customer Reliability: Within Customer Reliability, score is based
   on a composite of: Asset Criticality, Health and Risk, Power Quality
   Impacts, Risk of Potential Overload, and Availability of Contingency.
   Transmission projects also incorporate the benefits of relieving
   congestion.
- Public Impact: Includes potential benefits for critical customers or
  mitigation of public impact risks (e.g., environmental events).
- Employee Benefit: Benefits in reducing employee safety risk or
  improving workforce productivity.
- Growth & Technology: Benefits in implementing new, strategic
   technologies (e.g., automation) or supporting a strategic initiative in some
   way (e.g., conversion to standard voltages).

Financial – Net Present Value ("NPV") of Revenue Requirements
& NPV Net Income: These financial metrics are still being refined and do
not currently impact the relative score of distribution projects because they
essentially offset each other. Fundamentally, they are meant to represent
the customer cost impact (revenue requirement) and the net income impact
of capital expenditures.

7 Q: What are 'contingency options' in the context of Evergy's T&D system?

8 Contingency options are system configuration changes that can be implemented in A: 9 the event of an outage to restore service without causing an overload for an 10 effected area. Examples of contingency projects include, but are not limited to, 11 building new ties between circuits, adding new switching options and capacity 12 within substations, increasing circuit or line segment capacities to offer more 13 switching options, and installing a new substation to provide an alternate voltage 14 source for a particular area. The availability of contingencies is assessed through 15 annual planning evaluations and budget projects are identified for prioritization as 16 an output of these evaluations.

# 17 Q: What are the benefits of contingency-based projects to the T&D capital18 investment plan?

A: While adding contingencies does not mitigate the risk of outages occurring, they
 make the system more resilient and better able to respond, often reducing the
 duration of outages. Contingencies can often be added at a lower cost than a full
 rebuild or broad asset replacements.

## Q: Are there other ways that Evergy's capital investment plan can impact the duration of outages?

A: In addition to traditional asset replacement and specific budget projects we have
initiatives to install new communicating devices (ex: reclosers) that will integrate
with existing and future software systems to provide real-time visibility into
system performance as well as reduce or in some cases eliminate outage times
experienced by our customers by automating some restoration activities.

#### 8 Q: How do customers benefit from Evergy's investments in infrastructure?

9 A: There are a variety of benefits including lower operating costs, enhanced grid
10 resiliency, upgraded system visibility for quicker outage response times,
11 improved asset data quality to enable predictive maintenance (i.e., systemically
12 replace aging infrastructure before the end of useful life), more flexibility to
13 incorporate distributed generation into the system, meeting evolving expectations
14 related to increasingly sensitive customer equipment and power quality
15 requirements, and reducing energy losses experienced in older equipment.

## 16 Q: Has Evergy had any third party review of its current capital investment17 strategy?

18 A: We engaged the UMS Group, a firm specializing in enterprise-level value
19 creation, performance management solutions, and utility asset management, to
20 study our capital plan. A copy of the study is attached as Schedule BA-1.

#### 21 Q: What were the results of the study conducted by UMS Group?

A: UMS confirmed Evergy's capital investment levels and prioritization processesthat are designed to deliver benefits to customers. An excerpt from its executive

summary reads: "The Plan, as presented, will produce commensurate benefits
within a reasonable timeframe, while appropriately addressing the major risks that
could affect the Company's ability to provide safe, reliable and cost-effective
service to its Kansas and Missouri customers. Further, it positions Evergy for the
impending energy transition that is expected to occur over the next decade,
assuring a strong foundation with sufficient flexibility to manage through most
foreseeable uncertainties."

# 8 Q: What benefits did UMS Group determine would be realized from Evergy's 9 latest T&D capital investment plan?

10 A: UMS Group found reliability improvements, operational savings, and customer
11 benefits, as summarized below in Table 3.

#### 12 Q: How long does it take for the benefits listed in Table 3 to be realized?

13 There is generally a two to three-year lag between an increase in capital A: 14 investment geared toward improving the delivery system and the actual 15 realization of benefits. It should also be noted that UMS Group's study 16 encompasses T&D infrastructure investment projects for fiscal years 2020 17 through 2024, of which only 24 months has been executed at the time of this 18 filing. The calculated benefits in the table below only apply to assets impacted by 19 the plan and does not consider overall system results.

#### 20 Q: Are there any other benefits of Evergy's current capital plan?

A Yes, the current capital plan will have a positive effect on existing reliability
 levels by proactively replacing assets and hardening the system before
 components fail. Other benefits include operational efficiencies which consists of

outage elimination savings and reduced reactive work savings. In addition,
 benefits include customer benefits which is made up of "Reduced Overtime
 Savings" and "Avoided Customer Interruptions Savings". All benefits are
 summarized in Table 3 below.

5

Category	Metric	End-of-Plan Incremental (Annual) Impacts (in millions)		
		Missouri Metro	Missouri West	Total
Operational Efficiencies	Outage Elimination Savings	\$5.30	\$8.80	\$14.10
	Reduced Reactive Work Savings	\$1.50	\$1.70	\$3.20
Customer Benefits	Reduced Overtime Savings	\$4.20	\$6.90	\$11.10
	Avoided Customer Interruption Savings (DOE ICE Model)	\$4.20	\$7.10	\$11.30
Total Operational Efficiencies and Customer Benefits		\$15.20	\$24.50	\$39.70

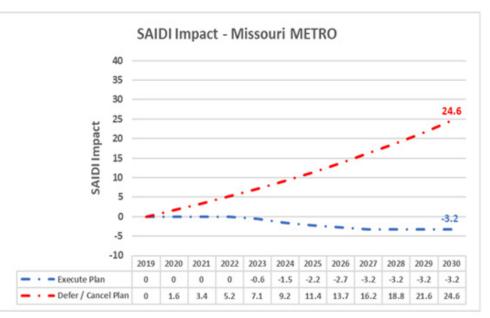
Table 3

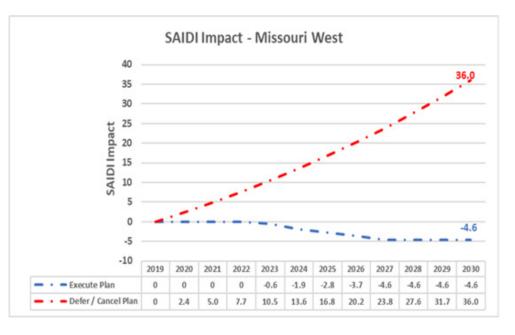
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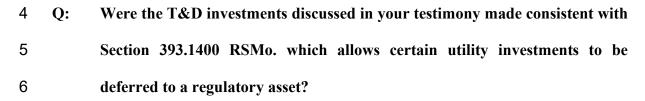
# 7 Q: Is there a risk to the T&D system absent the increased spend in Evergy's 8 capital plan?

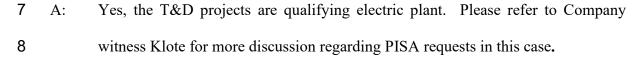
9 A: Yes. If the current T&D capital plan were not in effect, both of Evergy's Missouri
10 jurisdictions would have been at higher risk of experiencing a degradation of
11 reliability compared to 2019 levels, according to UMS Group's analysis. The
12 differences are shown in Figure 4.

Figure 2









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#### **Q:** Please describe the rationale for the storm reserve requested in this case?

A: A storm reserve is a systematic method to collect revenues from customers to be
set aside to be used for extraordinary storm Operating & Maintenance ("O&M")
expenses. Any non-labor O&M costs above \$200,000 would be charged against
the reserve. The adequacy of the reserve could be reviewed at each rate
proceeding.

#### 7 Q: How could a storm reserve benefit customers and the Company?

8 The storm reserve benefits customers by smoothing out major storm expenses A: 9 year over year to be recovered in rates. This smoothing of storm expenses will 10 create less rate volatility from rate case to rate case. The nature of storms create 11 volatility in expense, and a reserve will help smooth these events in rates for 12 customers. The Company receives a benefit from this mechanism through the 13 fact that there is a smoothing of storm expenses from an operating perspective. 14 By recording a levelized expense amount month over month creating a storm 15 reserve when storm expenses occur they are able to be charged against this 16 reserve creating less volatility in earnings year over year associated with these 17 significant storm events.

#### 18 Q: Do you have personal history operating with a storm reserve in place?

A: Yes, for many years and during the entirety of my time with Westar Energy, now
doing business as Evergy Kansas Central we maintained a storm reserve and rates
were set by the Kansas Corporation Commission supporting the maintenance of
the storm reserve.

- Q: In your experience, has the Evergy Kansas Central storm reserve been
   effective and operated as described?
- A: Yes. We modeled the requested storm reserve in this case after the Evergy
  Kansas Central storm reserve. For many years we have found that the storm
  reserve operates as intended in smoothing the amounts requested from customers
  in rates while also providing the opportunity to smooth potential utility operating
  earnings volatility year-to-year that can result from variations in storm intensity.

### 8 Q: What is the proposed process associated with this request for Evergy in this 9 case?

10 A: Please see the Direct Testimony of Company Witness Ronald Klote for a
11 discussion on the establishment of the reserve, the management of the reserve and
12 the plan to follow when the costs of storm damage exceed the storm reserve
13 balance.

14 Q: Does t

#### Does this conclude your testimony?

15 A: Yes, it does.

#### **BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

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In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement A General Rate Increase for Electric Service

Case No. ER-2022-0130

#### **AFFIDAVIT OF BRUCE AKIN**

#### **STATE OF MISSOURI** ) **SS COUNTY OF JACKSON**

Bruce Akin, being first duly sworn on his oath, states:

1. My name is Bruce Akin. I work in Topeka, Kansas, and I am employed by Evergy Metro, Inc. as Vice President, Transmission and Distribution.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri West consisting of twenty-three (23) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Subscribed and sworn before me this 7<sup>th</sup> day of January 2022.

My commission expires:  $\frac{44}{124}$  My commission expires:  $\frac{4}{24}$ 

### **SCHEDULE BA-1**

### CONTAINS CONFIDENTIAL INFORMATION NOT AVAILABLE TO THE PUBLIC.

**ORIGINALS FILED UNDER SEAL.**