

**Before the Public Service Commission  
of the State of Wyoming**

**In the Matter of the Application of  
Black Hills Power, Inc. d/b/a Black Hills Energy and Cheyenne Light, Fuel and Power Company  
d/b/a Black Hills Energy for a Certificate of Public Convenience and Necessity to Construct and  
Operate a Wind Generating Facility and Related Facilities in Laramie County, Wyoming**

Docket No. 20003-\_\_\_\_-EA-18

Docket No. 20002-\_\_\_\_ - EA- 18

(Record No. \_\_\_\_\_)

December 17, 2018

## TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
APPLICATION.....	1
SUMMARY OF PROPOSED PROJECT.....	2
EXHIBITS .....	3
STATUTORY AND REGULATORY REQUIREMENTS .....	3
 <b>Chapter 3, Section 21(c)(i)</b>	
A. Name and Address of Applicants .....	3
B. Type of Facility Proposed to be Constructed .....	4
C. Complete Description of Facilities-Engineering Drawings and Specifications .....	4
D. Rate Proposed to be Charged for the Service Rendered Due to Construction.....	5
E. Estimated Total Cost of Construction.....	6
F. Manner by Which the Proposed Construction will be Financed .....	6
G. Financial Condition of the Companies.....	7
H. Estimated Annual Operating Revenue and Operating Expenses .....	7
J. Estimated Start and Completion Date of Construction .....	7
 <b>Chapter 3, Section 21 (c)(ii)</b>	
A. Site Description.....	8
B. and C. Scenic, Historical, Archaeological, and Recreation Area- Environmental.....	8
D. Potential Safety Hazards .....	11
E., F., G. and H. Land, Mineral and Water Requirements-Status of Land Acquisitions.....	12
J. Statement of Need for the Project .....	12
K. Description of the Commodity or Service to be Provided .....	12
L. Effect of Project on Black Hills Power and Cheyenne Light Utility Systems Stability .....	13
M. List of Local, State, Indian, or Federal Agency Requirements .....	13

<b>Chapter 3, Section 21(d) – Authority to Serve .....</b>	<b>14</b>
NOTICES.....	14
REQUEST FOR APPROVAL .....	15

**EXHIBITS**

Exhibit 1	Map of the Corriedale Project
Exhibit 2	Preliminary Engineering Specifications and Drawings
Confidential Exhibit 3	Black Hills Power Forecasted Revenue Requirements
Exhibit 4	Cheyenne Light Forecasted Revenue Requirements
Exhibit 5	2017 Black Hills Power -WY Annual Report
Exhibit 6	2017 Cheyenne Light Annual Report
Exhibit 7	Phase I Environmental Site Assessment Report
Exhibit 8	Biological Survey and Eagle Risk Report
Exhibit 9	Cultural and Historical Report
Exhibit 10	Vegetation and Wetlands Report
Exhibit 11	Direct Testimony of Jason Hartman
Exhibit 12	Direct Testimony of Kyle White
Exhibit 13	Black Hills Power Renewable Ready Service Tariff Application
Exhibit 14	Cheyenne Light Renewable Ready Service Tariff Application

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF WYOMING

IN THE MATTER OF THE JOINT APPLICATION	)	
OF BLACK HILLS POWER, INC., d/b/a BLACK	)	
HILLS ENERGY AND CHEYENNE LIGHT, FUEL	)	
AND POWER COMPANY, d/b/a BLACK HILLS	)	Docket No. 20003-__-EA-18
ENERGY FOR A CERTIFICATE OF PUBLIC	)	Docket No. 20002-__-EA-18
CONVENIENCE AND NECESSITY TO	)	(Record No. _____)
CONSTRUCT AND OPERATE A WIND ENERGY	)	
FACILITY AND RELATED FACILITIES IN	)	
LARAMIE COUNTY, WYOMING	)	

**APPLICATION**

Black Hills Power, Inc. (“Black Hills Power”) and Cheyenne Light, Fuel and Power Company (“Cheyenne Light”) (collectively referred to as “Companies”) submit this Application for a Certificate of Public Convenience and Necessity (“CPCN”), pursuant to Wyo. Stat. § 37-2-205 and Chapter 3, Section 21 of the Rules of the Public Service Commission of Wyoming (the “Commission”).

Black Hills Power is incorporated under the laws of South Dakota with a principal place of business at 7001 Mount Rushmore Road, Rapid City, SD. Black Hills Power is a public utility as defined by Wyo. Stat. §37-1-101, and has been granted authority by this Commission to provide electric utility service in Wyoming.

Cheyenne Light is incorporated under the laws of Wyoming with a principal place of business at 1301 West 24<sup>th</sup> Street, Cheyenne, Wyoming. Cheyenne Light is a public utility as defined by Wyo. Stat. §37-1-101, and has been granted authority by this Commission to provide electric and gas utility service in Wyoming.

### Summary of Proposed Project

This Application is seeking a CPCN for a proposed 40 MW wind energy project referred to as "Corriedale" or the "Corriedale Project." Black Hills Power and Cheyenne Light will each have a 50% undivided ownership interest in the Corriedale Project. The Corriedale Project will consist of 16 - 2.5 MW General Electric (or equivalent) wind turbine generators and related facilities approximately 6 miles west of Cheyenne, Wyoming. Further detail of the project can be found in the direct pre-filed testimony of Jason Hartman. *See* Exhibit 11.

The Corriedale Project is designed to serve subscribers under Black Hills Power's and Cheyenne Light's proposed Renewable Ready Service Tariffs, which are currently pending before the Wyoming Public Service Commission and the South Dakota Public Utilities Commission. *See* Exhibits 13 and 14. The Renewable Ready Service Tariffs were designed by the Companies to serve commercial retail customers with an average aggregate usage of 300,000 kWh or more per year and governmental accounts desiring renewable energy. The Renewable Ready Service Tariffs will allow eligible customers to subscribe to a share of the energy generated by the Corriedale Project. Subscribers will see a Renewable Ready Charge (related to the cost of the Corriedale Project) and a Renewable Ready Credit (related to the reduction of the cost of energy to serve the subscriber). At the time of filing this Application, Black Hills Power has commitments for approximately 67% of its 20 MW share of the Corriedale Project and Cheyenne Light has commitments for approximately 19% of its 20 MW share of the Corriedale Project. Both utilities continue to engage customers and expect a fully subscribed program prior to the Corriedale Project commercial operation date. For more details on the Companies' Renewable Ready Service Tariffs, see Exhibits 13 and 14.

## Exhibits

Black Hills Power and Cheyenne Light submit the following exhibits in support of this

Application:

Exhibit 1	Map of the Corriedale Project
Exhibit 2	Preliminary Engineering Specifications and Drawings
Confidential Exhibit 3	Black Hills Power Forecasted Revenue Requirements
Exhibit 4	Cheyenne Light Forecasted Revenue Requirements
Exhibit 5	2017 Black Hills Power -WY Annual Report
Exhibit 6	2017 Cheyenne Light Annual Report
Exhibit 7	Phase I Environmental Site Assessment Report
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Exhibit 12	Direct Testimony of Kyle White
Exhibit 13	Black Hills Power Renewable Ready Service Tariff Application
Exhibit 14	Cheyenne Light Renewable Ready Service Tariff Application

### STATUTORY AND REGULATORY REQUIREMENTS

Pursuant to Wyo. Stat. § 37-2-205 and Chapter 3, Section 21 of the Commission Rules, Black Hills Power and Cheyenne Light provide the following information for consideration by the Commission:

#### **Chapter 3, Section 21 (c)(i):**

##### **A. Name and address of applicants:**

Black Hills Power, Inc., 7001 Mount Rushmore Road, Rapid City, South Dakota. Black Hills Power is an electric utility as described in Wyo. Stat. § 37-1-101, and is engaged in the

generation, transmission, distribution, purchase and sale of electric power and energy through an interconnected transmission network.

Cheyenne Light, Fuel and Power Company, 1301 West 24<sup>th</sup> Street, Cheyenne, Wyoming. Cheyenne Light is an electric utility as described in Wyo. Stat. § 37-1-101, and is engaged in the generation, transmission, distribution, purchase and sale of electric power and energy through an interconnected transmission network.

**B. Type of facility proposed to be constructed:**

The Companies are requesting authority to construct, own, operate and maintain a wind energy facility along with related facilities, including but not limited to:

- 16 - 2.5 MW General Electric (or equivalent) wind turbine generators
  - three blades
  - nacelle housing the hub, gearbox and generator
- Pad-mounted step-up transformer
- Underground electric cable

Black Hills Power and Cheyenne Light will each own 50% of the project. The Corriedale Project will occupy approximately 5,000 acres of land and will connect to the Cheyenne Light transmission system. *See* Exhibit 1 for a map of the proposed facilities.

**C. Complete Description of Facilities - Engineering Drawings and Specifications:**

The Companies will design and construct the Corriedale Project consisting of 16 - 2.5 MW General Electric (or equivalent) wind turbine generators and related facilities. The Corriedale Project will be designed in accordance with the maps and drawings found in Exhibit 1 and Exhibit. All Black Hills Power and Cheyenne Light facilities, including the Corriedale

Project, are designed, constructed, operated and maintained to meet or exceed applicable standards of design and performance under current applicable standards.

In addition to the wind turbine generators, the Companies will design, purchase equipment and materials, and construct ancillary facilities required by the Corriedale Project. Ancillary facilities will include, but are not limited to, a pad-mounted step-up transformer and underground electric cable.

In this Application, the Companies provide a complete description of the facilities proposed to be constructed, including preliminary engineering specifications in sufficient detail to properly describe the principal systems and components. *See* Exhibit 2 for the preliminary engineering specifications. Final engineering design drawings and specifications for the Corriedale Project are expected to be available by June 2019. The project timeline is described in the direct testimony of Jason Hartman. *See* Exhibit 11.

**D. Rate Proposed to Be Charged for the Service Rendered Due to Construction:**

The Companies are proposing to charge separate rates specific to the Corriedale Project. The rates proposed by the Companies are detailed in separate applications for Renewable Ready Service Tariffs filed with the South Dakota Public Utilities Commission and the Wyoming Public Service Commission. *See* Exhibits 13 and 14. The testimony of Kyle White, Exhibit 12, describes these filings in detail. The cost of the project, proportional to the ownership interest held, will be included in the next general rate reviews filed by Cheyenne Light and Black Hills Power. Black Hills Power's forecasted average annual revenue requirement of approximately \$2.2 million associated with its 50% ownership of the Corriedale Project is shown in Confidential Exhibit 3. Cheyenne Light's forecasted average annual revenue requirement of approximately \$2.2 million associated with its 50% ownership of the Corriedale Project is shown



in Exhibit 4. Black Hills Power's and Cheyenne Light's revenue requirements are based on the total Corriedale Project construction cost of approximately \$57 million and yearly operation and maintenance ("O&M") costs split equally between Black Hills Power and Cheyenne Light. The O&M costs are as follows: assuming a 25 year useful life, annual depreciation will be approximately \$2.3 million per year; and yearly turbine O&M is estimated at \$720,000 (\$45,000 per turbine applied to a total of 16 turbines).

The Corriedale Project will operate under a 25 year land lease. Annual lease expenses are 3.5% of gross operating revenue in years one through 10. These expenses will increase to 5% in years 11 through 20 and to 6.5% in years 21 through 25 pursuant to the lease agreement.

Based on similar wind projects developed by Black Hills Corporation for its electric utility subsidiary in Colorado, the Companies estimate that O&M expenses not related to the turbines will be estimated at \$140,800 per year for the entire Corriedale Project. Based upon levies for the 2018 tax year, Black Hills Power will use a .353% levy for its yearly property tax expense. Cheyenne Light will use a 0.387% levy for its yearly property tax expense. The State of Wyoming also imposes a tax on all electricity generated from wind sources. The current wind tax rate is equal to \$1/MWh. Yearly corporate allocated costs are estimated to be \$374,918 for the entire project based on Black Hills Corporation's latest Corporate Allocation Manual.

**E. Estimated Total Cost of Construction:**

The estimated total cost of construction of the Corriedale Project is approximately \$57 million. Jason Hartman describes the cost estimate in his direct testimony. *See* Exhibit 11.

**F. Manner by Which the Proposed Construction Will Be Financed:**

Financing for construction of the Corriedale Project will be through the use of internally generated funds.

**G. Financial Condition of the Companies:**

Black Hills Power is financially sound. Black Hills Power's 2017 Annual Report to the Wyoming Public Service Commission includes Black Hills Power's financial condition information and is attached as Exhibit 5.

Cheyenne Light is financially sound. Cheyenne Light's 2017 Annual Report to the Wyoming Public Service Commission includes Cheyenne Light's financial condition information and is attached as Exhibit 6.

**H. Estimated Annual Operating Revenue and Operating Expenses:**

The Companies expect to earn a return from the Corriedale Project under the expectation that the Renewable Ready Service Tariffs will be fully subscribed. Full subscription will allow the Companies to earn the revenue requirement on the Corriedale Project as subscribers will pay the levelized cost of the Corriedale Project. The estimated annual operating expenses associated with the Corriedale Project for each company are detailed in the revenue requirements included as Confidential Exhibit 3 and Exhibit 4 to the Application. The tables below contain the estimated operating expenses for the proposed facilities for the first ten years:

<b>Black Hills Power</b>										
Year	1	2	3	4	5	6	7	8	9	10
Total Operating Expenses (Million \$)	2.04	2.051	2.06	2.075	2.087	2.1	2.112	2.125	2.139	2.181

<b>Cheyenne Light</b>										
Year	1	2	3	4	5	6	7	8	9	10
Total Operating Expenses (Million \$)	2.049	2.06	2.073	2.085	2.097	2.109	2.122	2.135	2.148	2.191

**J. Estimated Start and Completion Date of Construction:**

The Companies plan to have the Corriedale Project in service by September 30, 2020. The following chart lays out expected completion dates for phases of the project:

<b>Task / Topic</b>	<b>Expected Completion</b>
Landowner Agreement	Q1 2019
Order Placed for Turbines	August 1, 2019
Final Project Design	Q2 2019
Major Equipment Delivery	Q2 and Q3, 2020
Environmental Permits	Q1 2020
Construction Complete	September 2020

**Chapter 3, Section 21 (c)(ii) - Major Facilities:**

The Companies have determined the Corriedale Project is a major facility under the Commission rules, as it is an electric generating plant and associated facilities.

**A. Site Description**

The location of the Corriedale Project and related facilities will be approximately six miles west of Cheyenne in Laramie County, Wyoming. The entire Corriedale Project will be located on approximately 5,000 acres of private land and the Companies are negotiating a lease agreement with the landowner for use of the property for a minimum of 25 years. The interconnection of Corriedale to the Cheyenne Light system will be at the West Cheyenne Substation.<sup>1</sup>

**B. and C. Scenic, Historical, Archeological, and Recreation Areas  
Environmental Review**

On June 23, 2016, Cultural Resource Analysis, Inc. conducted a records review of the Corriedale Project. The review included a one mile buffer area around the project boundary and was conducted with the Wyoming Cultural Records Office. This review identified five previously recorded sites in the project area. Two of these properties (LA541-historic railroad and LA1402-old powerline) were determined to be eligible for inclusion in the National Register

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<sup>1</sup> Cheyenne Light will be filing an application for a CPCN for this proposed 115 kV substation in the first quarter of 2019.

of Historic Places, two (LA60-prehistoric lithic scatter and LA222-prehistoric stone features) were determined or recommended as not eligible, and one (LA394-historic ranch/King Ranch) was not evaluated. The Corriedale Project will be designed to avoid impact to these resources.

- **Environmental Assessments:** A Phase I Environmental Site Assessment on the Corriedale Project location was completed on August 12, 2016. Four Recognized Environmental Conditions were identified in the report:

1. Contaminated groundwater - The U.S. Department of Defense has placed monitoring wells on the southern portion of the property area to track contamination in groundwater associated with a former missile site located approximately 12 miles east of the subject property. This situation is an existing release to the environment.

2. 500-gallon diesel underground storage tank - The property owner disclosed he has an approximately 20-year old on-site underground storage tank that is still in use. The property owner did not have any documentation on the tank. The age and lack of documentation is indicative of an existing release and/or poses a material threat of a release to the environment.

3. Dump area - An area in the northeast portion of the property is used by the landowner to store inoperable vehicles and machinery. The vehicles are lined up in an orderly manner, but oil and other fluids can leak onto the ground over time. This situation poses a material threat of a future release to the environment.

4. The presence of lead bullet fragments in soil at the gun range. This situation is an existing release to the environment.

The identified Recognized Environmental Conditions are unrelated to Black Hills Power and Cheyenne Light as the Companies do not own the property. The Recognized Environmental Conditions will not have any material impact on the Corriedale Project and the project will not have any impacts on the Recognized Environmental Conditions. *See* Exhibit 7 to the Application.

- **Avian and Endangered Species Review:** Avian surveys were performed in 2016 and 2017. Five United States Fish and Wildlife Service ("USFWS") Birds of Conservation Concern were seen in the Corriedale Project area. However, no endangered, threatened or candidate species listed in the Endangered Species Act were detected during the year-long surveys. The species with the highest potential risk index was the American crow, followed by the turkey vulture, red-tailed hawk and the common raven. The acoustical bat detection survey recorded six bat species on site. Four golden eagle nests were detected within the 10-mile buffer around the project boundary. Golden eagles, which were observed in the Project area, are protected under the Bald and Golden Eagle Protection Act. No active raptor nests were observed within the Project area or within a 0.5 mile buffer. The Companies will develop an Eagle Conservation Plan and secure an Eagle Take Permit from the USFWS. Part of the plan assessment will be to run a model to determine the number of eagle fatalities over a designated period of time. The plan is designed to create avoidance impact measures and establish eagle take offsets (retrofitting of powerline poles with avian safe measures) based upon the model's result of potential eagle fatalities. *See* Exhibit 8 to the Application.

**Waste Management:** All waste construction materials and rubbish from the construction area will be collected, hauled away, and disposed of at approved sites. Any recyclable waste materials generated will be recycled.

- **Oil Spill Control:** The gear boxes, turbines and transformers at the site will contain oil and pose a risk of leaking or spilling. A Spill Prevention Control and Countermeasures Plan as required by 40 C.F.R.112 will be developed and implemented for the site. This will include routine inspections and corrective action measures to address any leaks or spills from equipment.
- **Erosion Control:** A Construction Storm Water Permit will be secured from the Wyoming Department of Environmental Quality prior to commencement of construction. The Storm Water Pollution Prevention Plan (“SWPPP”), which is in progress, will outline the best practices to manage soil disturbance during construction of the Corriedale Project and until the disturbed areas have been re-vegetated. The SWPPP will be provided to the Commission in this Docket once completed.

**D. Potential Safety Hazards:**

The proposed site is undeveloped therefore, the safety hazards associated with demolition of structures will not be an issue. During operation, solid waste will be hauled off site by a third-party contractor. During construction, all underground and overhead utilities will be located to prevent interference. Air quality will be protected through the best available control technology as required by the Wyoming Department of Environmental Quality.

**E., F., G. and H. Land, Mineral and Water Requirements - Status of Land Acquisitions**

The Corriedale Project is located completely on private land owned by one landowner. The Companies are in the process of securing a lease agreement with the landowner for a minimum term of 25 years.

Mineral rights will not be required for the Corriedale Project.

Fuel will be required for construction vehicles and equipment. Fuel and water will be transported on trucks and will not be in a quantity to merit a transportation plan, Department of Transportation reporting, or a Spill Prevention Control and Countermeasure Plan.

**J. Statement of Need for the Project:**

The Corriedale Project is designed by the Companies to serve customers under their Renewable Ready Service Tariffs. Black Hills Power has applied to the South Dakota Commission and Cheyenne Light has applied to the Wyoming Commission for approval of an innovative tariff to serve eligible commercial customers and governmental accounts with renewable energy. *See Exhibits 13 and 14.* The Renewable Ready Service Tariffs were designed in response to customer desire for renewable energy to meet sustainability goals. The Corriedale Project will be the source of renewable energy to serve customers under the Renewable Ready Service Tariffs.

**K. Description of Commodity Service to be Provided:**

The Companies will deliver electric service generated by the Corriedale Project to subscribing customers.

**L. Effect of Project on Black Hills Power and Cheyenne Light Utility Systems Stability:**

In the course of completing the interconnection process for the Corriedale Project, a system impact study was performed. The system impact study evaluated the impact of the proposed wind energy project under the guidance of the Cheyenne Light Power Transmission Large Generator Interconnection Procedures. The results of the study determined that there are no adverse impacts to the Cheyenne Light System as a result of the Corriedale Project. Although a system impact study was not performed for the Black Hills Power System, no adverse system impacts are expected.

**M. List of Local, State, Indian, or Federal Agency Requirements:**

The Companies have determined that the following local, state, Indian, or federal government agencies have requirements which must be met in connection with the construction or operation of the Corriedale Project:

<b>Agency</b>	<b>Required Permit and Regulatory Review</b>
Wyoming Department of Environmental Quality	Hydrostatic Discharge Permit
Wyoming Department of Environmental Quality	Large Construction Activity Permit - Storm Water Permit
U.S. Army Corps of Engineers	Review of Potentially Affected Waterways
United States Fish and Wildlife Service	Endangered and Threatened Species Review
Wyoming Game & Fish Department	Endangered and Threatened Species Review

The Companies will obtain the required permits upon approval of this CPCN and prior to construction of the facilities.



**Chapter 3, Section 21(d) - Authority to Serve:**

The facilities required for approval under this CPCN will generate electricity that will be delivered to Cheyenne Light's and Black Hills Power's existing service areas. Black Hills Power and Cheyenne Light possess the requisite Commission authority and currently provide service to the communities where this electricity will be delivered. Therefore, additional certification for service to customers outside of the Black Hills Power and Cheyenne Light service areas is not required.

**NOTICES**

Notices regarding this Application should be sent to:

Shirley Welte  
Vice President Operations  
Cheyenne Light  
1301 West 24<sup>th</sup> Street  
Cheyenne, WY 82001  
Shirley.Welte@blackhillscorp.com

Nick Gardner  
Vice President Electric Operations  
Black Hills Power  
P.O. Box 1400  
Rapid City, SD 57709  
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### **REQUEST FOR APPROVAL**

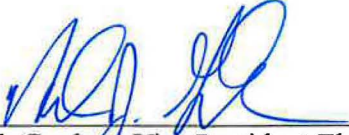
The Corriedale Project is necessary and in the public interest. This Application and the supportive exhibits and testimony demonstrate that public convenience and necessity requires the granting of the Application.

WHEREFORE, Black Hills Power, Inc. and Cheyenne Light, Fuel and Power Company respectfully request the Public Service Commission of Wyoming to enter an order granting the following:

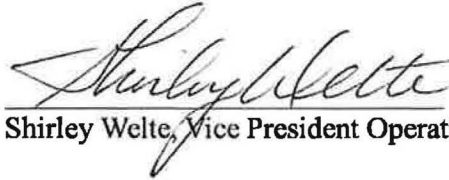
- A Certificate of Public Convenience and Necessity authorizing the construction, ownership (Black Hills Power - 50% and Cheyenne Light - 50%), operation and maintenance of the Corriedale Project and related facilities as described and proposed herein; and
- A determination that the Corriedale Project assets are used and useful and can be included in generation plant as a rate base item.

Black Hills Power, Inc.

Cheyenne Light, Fuel and Power Company



Nick Gardner, Vice President Electric  
Operations



Shirley Welte, Vice President Operations

**Address of Applicants:**

Black Hills Power, Inc.  
P.O. Box 1400  
Rapid City, SD 57709

Cheyenne Light, Fuel & Power Company  
1301 W 24th Street  
Cheyenne, WY 82001

**Counsel for Applicants:**

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Associate General Counsel  
Black Hills Corporation  
PO Box 1400  
Rapid City, SD 57709  
Jana.White@blackhillscorp.com  
Wyo. Bar #: 7-6044




BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

\* \* \* \* \*

STATE OF WYOMING )  
 ) SS  
COUNTY OF LARAMIE )

I, Shirley Welte, being duly sworn, do hereby depose and say that I am Vice President, Operations for Cheyenne Light, Fuel and Power Company, an Applicant in the foregoing Application, and I have read such Application, and that the facts set forth therein are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Shirley Welte  
Vice President of Operations

Subscribed and sworn to before me this 14<sup>th</sup> day of December, 2018.



  
\_\_\_\_\_  
Notary Public

My Commission Expires: June 23, 2019