B. Demand-Side Management Programs

i. *Party Positions*

352. Utilities are required by Montana statute to include DSM options in their supply resource planning and procurement processes. Mont. Code Ann. § 69-3-1209. Currently, NWE offers the following programs: E+ lighting for commercial and residential LED lighting, E+ Commercial Programs and Contractors for training and marketing energy efficiency measures to contractors, and E+ Commercial Electric Rebate Program, which includes incentives for motor rewinding.

353. NWE currently uses a total resource cost ("TRC") test to evaluate the cost effectiveness of DSM programs. NWE calculates the avoided cost value of energy saved and the total DSM program costs for its TRC test. NWE explains that carbon cost adders have recently been included in DSM avoided costs, so the 10% environmental benefit adder that was previously included in the TRC is no longer utilized. No carbon adder was included in DSM avoided costs for the 2018-2019 or 2019-2020 program years, based on Commission decisions to not include a carbon cost in avoided cost calculations for qualifying facilities. DSM measures and program lives are also restricted to 15 years to comply with the Commission's Order 7500d in Docket D2016.5.39. Test. Dani Williams, 1-9 (Sep. 28, 2018).

354. NWE initially proposed to remove DSM costs from NorthWestern's electricity supply tracker in Docket D2017.5.39. Rather, NWE proposed to record DSM expenditures as a regulatory asset amortized over a 15-year period. NWE states that Commission rules require NWE to treat DSM as a supply resource, and so it is reasonable for NWE to treat DSM as an investment included in the asset base as capitalization allows NWE to spread large expenditures over a reasonable time without rate fluctuation. Test. Lail at 20-22.

355. NWEC witness F. Diego Rivas does not believe that all cost-effective energy efficiency measures are being pursued by NWE. For example, NWE could be pursuing residential measures such as faucet aerators or smart thermostats, which were identified as cost-effective in NWE's 2016 Electricity Energy Efficiency Market Potential Study. Rivas also believes that NWE is incorrectly using the TRC test to calculate cost-effectiveness of efficiency measures. NWE only uses the avoided cost value of energy saved as the benefit of the measure, while other utilities also include the reduction in transmission, distribution, generation, and capacity costs valued at a marginal cost for the periods where there is a reduction in load. Rivas

suggests that the Commission should either direct NWE to correctly apply the TRC or use the Utility Cost Test ("UCT"), which is the avoided energy and capacity costs plus transmission and distribution benefits, divided by the total program costs. Test. Rivas at 12-25.

356. In response, MCC suggests that if NWE is allowed to defer DSM costs, the amortization of the deferred DSM costs should commence by the end of the year in which the costs are incurred. MCC Witness Ralph Smith also recommends that a $45 million threshold should be set for DSM deferral costs, to prevent accumulation of large amounts between rate cases. If the threshold is reached, it would trigger a requirement for NWE to make a filing with a Commission that includes a plan for cost recovery. Test. Ralph Clark at 78-82 (Feb. 12, 2019).

357. MCC witness David Dismukes explains that NWE provided few details on its DSM proposal, including how it proposes to defer its annual DSM expenses, whether or not any return will be included with the expenses booked, or whether or not deferred investments will be amortized prior to the ultimate incorporation into rate base. There is also no cap on deferred costs or the ultimate size of the proposed regulatory asset. Dismukes recommends that the Commission continue to incorporate annual DSM expenses through the PCCAM, without being subject to the deadband or sharing percentages. Test. Dismukes at 26-29.

358. In reply, NWE witness Crystal Lail states that NWE is not opposed to keeping the DSM costs in the PCCAM, as long as recovery is 100% and not subject to the deadband and sharing percentages. NWE is opposed to starting the amortization of deferred DSM costs at the end of the year in which the costs are incurred. Lail explains that Commission practice in Montana has been to begin depreciating assets in the year following the year the assets are placed into service. NWE opposes Smith's suggestion to implement a $45 million threshold for accumulated deferred DSM costs. Reb. Test. Lail at 18-20.

359. Additionally, NWE witness Danie Williams states that NWE did not revise its DSM acquisition target due to the Commission's decision to discontinue the lost revenue adjustment mechanism, but rather as a result of the Electricity Energy Efficiency Market Potential Study conducted by Nexant, Inc. That study showed more robust potential efficiency programs than what NWE implements in Montana, because NWE tries to focus on DSM programs that simplify offerings and set rebates at levels that drive customer participation. Administrative and promotional costs, which can often outweigh benefits, would not be cost-effective. Reb. Test. Danie Williams at 2-3 (Apr. 5, 2019).

360. Williams explains that NWE discontinued its DSM programs for residential electric customers, with the exception of lighting, because the programs were not cost-effective. In NWE's Montana service territory, residential measures tend to result in relatively small per-customer energy savings. Williams states that the avoided cost for DSM has decreased since the Nexant study, from $40.70/MWh to $37.57/MWh, which decreases the margin available to absorb administrative costs. *Id*. 5

361. Williams states that an Electric Potential study was completed by Nexant in 2017, and updates are expected to be completed in 2019. That study provides information to calculate capacity contribution for DSM resources. *Id*. 7

ii. ***DSM Stipulation***

362. On May 20, 2019, the Commission received a Stipulation between NWE and the NWEC regarding capitalization and amortization of DSM costs. The following two Stipulation paragraphs require a Commission decision:

> ¶1. The Stipulating Parties agree that NWE will create a small (no more than 10 people), advisory stakeholder group consisting of relevant and appropriate stakeholders selected by NWE, which shall include at minimum representatives from the NWEC, the MCC, and Commission staff, to discuss re-envisioning of the electric DSM programs offered by NWE for the 2020-2021 program year (items to be discussed include branding, methods of marketing, cost-effectiveness calculations, and energy savings estimates). The group shall make recommendations to NWE for consideration in the development of the 2020-2021 electric DSM program offerings. Once the 2020-2021 program year commences, the group shall be disbanded. The Stipulating Parties will also include a 10% adder for electric DSM in its cost-effectiveness calculations beginning with the 2020-2021 program year, unless a different adder is required by Montana Administrative Rules and continue its work towards including a capacity value of electric DSM measures and/or programs in cost-effectiveness calculations."
>
> ¶2. With regard to recovery of electric DSM expenditures, the Stipulating Parties agree that NWE shall record any DSM expenditures as a regulatory asset in the year the expenditures are incurred. NWE shall also amortize these DSM expenditures over 10 years starting coincident with the Commission order that approves the expenditures for inclusion in rates at which time NWE will earn a return of and return on all electric DSM expenditures at the Rate of Return approved by the Commission, including any adjustment to Return on Equity ("ROE") for conservation investments pursuant to Montana Code Annotated Title 69, chapter 3, part 7. The Stipulating Parties agree that there should not be a threshold level of the DSM regulatory asset that triggers the need for a filing by NWE.

iii. ***Commission Finding***

363. The Commission rejects the DSM Stipulation. However the Commission finds merit in ¶ 1 of the Stipulation, regarding creation of a DSM stakeholder group. The Commission also continues the current practice of allowing NorthWestern to recover DSM expenses through NorthWestern's annual electricity supply cost tracker.

364. First, the Commission orders NorthWestern to create the stakeholder group provided for in ¶ 1. This paragraph proposes a stakeholder group to make recommendations on electric DSM programs, to which no party objected. The Commission is concerned that the timeframe for the stakeholder group to complete its work prior to the commencement of the July 1, 2020-2021, DSM programs may be too short. To address this concern, by May 1, 2020, NWE shall report to the Commission regarding the progress of the stakeholder group and an assessment of the probability of being able to include the stakeholder recommendations in NorthWestern's 2020-2021 DSM program offerings. NWE may request an extension at that time to incorporate stakeholder group recommendations into the 2021-2022 DSM program year rather than the 2020-2021 program year.

365. Second, the Commission rejects a 10% adder for DSM cost-effectiveness in its TRC cost tests. The final sentence of Paragraph 1 addresses the incorporation of a 10% adder for electric DSM in NWE's cost-effectiveness calculations, beginning with the 2020-2021 program year. Prior to the 2015-2016 DSM program year, NWE used a 10% factor to evaluate environmental benefits based on the Northwest Power Act of 1980, which states that conservation measures should be evaluated at 110% of the cost of an alternative resource. In the 2015-2016 DSM program year, NWE discontinued the 10% factor in favor of a carbon cost adder in its DSM avoided costs calculations, based on the Carbon Penalty Forecast in its Electricity Supply Resource Procurement Plan. This translated to a carbon price of $21.11/metric ton beginning in 2021 (and escalating at 5% annually) for the 2015-2016 DSM program year, and $20.00/metric ton beginning in 2022 for the 2016-2018 DSM program years. No carbon adder was included in DSM avoided costs for the 2018-2019 or 2019-2020 program years, based on Commission decisions to not include a carbon cost in avoided cost calculations for qualifying facilities.

366. The Commission further rejects the use of the UCT in this docket, however the Commission does recommend that the UCT, inputs to the TRC test, and any other potentially

appropriate cost-benefit tests should be discussed in the DSM stakeholder forum and considered for future DSM proposals. The DSM stakeholder group should consider if a 10% adder or some other method is appropriate when it discusses future DSM program offerings.

367. Third, the Commission directs NorthWestern to continue recovery of DSM expenses in its annual electricity supply cost tracking mechanism. Paragraph 2 of the Stipulation allows for the capitalization of NWE's DSM expenditures as a regulatory asset in the year the expenditures are incurred. NWE cites Mont. Code Ann. §§ 69-3-702, -712, and 69-3-1206 in support of its position that inclusion of DSM costs in rate base is consistent with policy expressed by the Montana Legislature that utilities should be encouraged to invest in conservation resources. NWE In. Br. at 13 (Jul. 10, 2019). NWE also cites to prior Commission orders to suggest that inclusion of DSM expenditures in rate base is consistent with Commission precedent. *Id*., *citing* Dkt. D94.11.49, Order No. 5875, 6 (Oct. 31, 1995), *and* Dkt. D2014.6.53, Order No. 7375a, ¶ 56 (Oct. 15, 2015).

368. NWEC also provided post-hearing briefing advocating approval of the DSM settlement. *See generally* NWEC Resp. Br. at 2-9 (Jul. 31, 2019). NWEC's brief focuses on a variety of policy-based reasons for capitalization of DSM expenditures. However at hearing, Rivas initially testified that, while he does not oppose capitalizing DSM costs, he prefers the current practice of expensing them. Test. Rivas at 5. Rivas noted that capitalization of DSM could be expected to increase total costs for customers; limit additional DSM investment due to lengthy spread of recovery; create a regulatory asset that provides a rate of return for dollars spent instead of savings achieved; and lead to an increased cost of debt. *Id*. at 6. However, he also noted that capitalization spreads the cost out over a period of time that matches the flow of benefits and provides incentives for utilities to more aggressively pursue DSM resources. *Id*. at 5.

369. MCC opposed the Stipulation, advocating for continued recovery of DSM expenditures as an expense. MCC contends that, because customers will pay for both the actual cost of DSM programs as well as a return on those costs (rather than the actual costs alone), capitalization will lead to increased DSM costs which, in turn will lead to increased rates. MCC Resp. Br. at 19. It suggested that NWE's proposal might violate the principal of intergenerational equity if another significant period of time elapses before NWE's next rate case. *Id*. at 21. The

MCC was also critical of the absence of a cap on deferred costs or the size of the regulatory asset. Test. Smith at 81-82.

370. Finally, MCC criticized the lack of detail in NWE's proposal in that it provided little guidance as to how the change would be implemented. Specifically, MCC pointed out that NWE did not explain how annual DSM expenses will be deferred or whether deferred investments would be amortized prior to their inclusion in rate base used for ratemaking. Test. Dismukes at 28-29.

371. LCG joined MCC in opposing the Stipulation, noting similar intergenerational inequity issues. LCG Resp. Br. at 19 (Jul. 31, 2019). LCG also argued that NWE's proposal to capitalize DSM costs is fundamentally at odds with the stated purpose of DSM programs. *Id*. To that end, LCG notes NWE's statement that "DSM 'programs promote electric energy efficiency and conservation and are *important because they reduced NWE's need to purchase or build electric supply resources*.'" *Id*., *citing* NWE In. Br. at 12 (emphasis in original). LCG points out that while DSM programs avoid the need for additions to rate base for which customers would pay NWE a return, capitalization of DSM expenditures creates the same ratemaking treatment for the DSM programs which NWE purports would reduce the need for capital investments.

372. Based on the foregoing, MCC and LCG both argue that, in contrast to recovering the actual cost of, and return on, DSM, it is more appropriate for NWE to continue dollar-for-dollar recovery of DSM costs as an expense within NWE's PCCAM.

373. The Commission agrees with the MCC position that, ultimately, capitalization of DSM expenses will lead to higher costs for ratepayers. Capitalization would mean not only a recovery of the DSM costs, but in addition, it would allow NWE a return on those costs. The Commission also agrees with the LCG and the MCC regarding intergenerational inequities if DSM costs are capitalized. As a result the Commission orders that DSM costs shall continue to be recovered on a dollar-by-dollar basis through the PCCAM.

374. The ordered treatment of DSM cost is consistent with state law. The 2019 Legislature amended Mont. Code Ann. § 69-3-712(1). That legislation, which will become effective July 1, 2020, states: "[i]n order to encourage the purchase of or investment in conservation by a utility, the commission *may* include conservation purchases or investments *and demand-side management programs* eligible under 69-3-702 and in compliance with the

criteria adopted under 69-3-711 and 69-3-1201 through 69-3-1209 in a utility's rate base." Emphasis added.

375. This amended statute explicitly includes "demand-side management programs," where the current statute does not. It also provides the Commission clear discretion in determining whether the stated expenditures should be included in rate base by replacing the word "shall" with "may". This specific exclusion of "demand-side management programs" from the current statute leads the Commission to conclude that DSM expenditures are not subject to the compulsory inclusion in rate base suggested by the current version of Mont. Code Ann. § 69-3-712. The Commission also concludes that when the newer version of § 69-3-712 becomes effective (in July of 2020), the inclusion of DSM costs in rate base will be subject to Commission discretion based on amendment of the word "shall" to "may". The Commission therefore concludes that the Commission's current practice is consistent with Montana law.

376. Importantly, the Commission observes that this issue is not properly before the Commission because NWE has not requested including any specific DSM investments in rate base. Instead NWE's request is prospective in nature because it seeks permission to account for DSM expenditures in rate base for inclusion in NorthWestern's next general rate case filing. Even if the Commission were to allow capitalized DSM costs, under the currently effective statute the Commission lacks the information necessary to perform the analysis required by §§ 69-3-712, -711, and -702 to decide whether specific DSM expenditures should be included in rate base. When NWE files it's next general rate case filing, the amended Mont. Code Ann. § 69-3-712 will be effective, and at that time, the Commission will review requests for inclusion of DSM expenditures in rate base.

C. Jurisdictional Cost of Service Study

i. *Party Positions*

377. The revenue requirement for NorthWestern's Montana retail transmission customers is presently determined, with two steps. Under its current practice, NorthWestern includes one-hundred% of its Montana transmission costs (plant and expenses) in its revenue requirement set by FERC for NorthWestern's wholesale transmission customers. Test. Cashell at 17 (Sep. 28, 2018). NorthWestern also includes that same total amount in its revenue requirement set by this Commission. *Id*. FERC allocates an appropriate portion of transmission costs to be recovered from NorthWestern's FERC-jurisdictional wholesale customers. *Id*. This

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

IN THE MATTER OF NorthWestern Energy's Application for Authority to Increase its Retail Electric Utility Service Rates and For Approval Of its Electric Service Schedules and Rules.	))))	REGULATORY DIVISION DOCKET NO. D2018.2.12

STIPULATION AND SETTLEMENT AGREEMENT OF NORTHWESTERN ENERGY AND THE NORTHWEST ENERGY COALITION

NorthWestern Corporation d/b/a NorthWestern Energy ("NorthWestern") and the NW Energy Coalition ("NWEC") (collectively "Stipulating Parties"), by and through their undersigned representatives, hereby submit to the Montana Public Service Commission ("Commission") this Stipulation and Settlement Agreement ("Agreement").

For settlement purposes, a fair and equitable resolution has been reached by the Stipulating Parties on the issues raised in this Docket concerning NorthWestern's electric Demand Side Management ("DSM") measures and/or programs, including capitalization and cost-effectiveness ("Settled Issues"). To reach a fair and equitable resolution of the issues that were raised or could have been raised by the Stipulating Parties regarding the Settled Issues, the Stipulating Parties stipulate and agree as follows:

1. The Stipulating Parties agree that NorthWestern will create a small (no more than 10 people), advisory stakeholder group consisting of relevant and appropriate stakeholders selected by NorthWestern, which shall include at minimum representatives from the NWEC, the MCC, and Commission staff, to discuss re-envisioning of the electric DSM programs offered by NorthWestern for the 2020-2021 program year (items to be discussed include branding, methods of marketing, cost-effectiveness calculations, energy savings estimates). The group shall make recommendations to NorthWestern for consideration in the development of the 2020-2021 electric DSM program offerings. Once the 2020-2021 program year commences, the group shall be disbanded. The Stipulating Parties will also include a 10% adder for electric DSM in its cost-effectiveness calculations beginning with the 2020-2021 program year, unless a different adder is required by Montana Administrative Rules and continue its work towards including a capacity value of electric DSM measures and/or programs in cost-effectiveness calculations.

2. With regard to recovery of electric DSM expenditures, the Stipulating Parties agree that NorthWestern shall record any DSM expenditures as a regulatory asset in the year the expenditures are incurred. NorthWestern shall also amortize these DSM expenditures over 10 years starting coincident with the Commission order that approves the expenditures for inclusion in rates at which time NorthWestern will earn a return of and

return on all electric DSM expenditures at the Rate of Return approved by the Commission, including any adjustment to Return on Equity ("ROE") for conservation investments pursuant to Montana Code Annotated Title 69, chapter 3, part 7. The Stipulating Parties agree that there should not be a threshold level of the DSM regulatory asset that triggers the need for a filing by NorthWestern.

3. The Stipulating Parties support implementation of the Fixed Cost Recovery Mechanism ("FCRM") pilot recommended by the Human Resource Council and National Resources Defense Council with no adjustment to the ROE. The Stipulating Parties support consideration of whether such an ROE adjustment would be appropriate if the FCRM was to become permanent as part of the study process envisioned by the pilot. If the study suggests a potential ROE adjustment might be appropriate, such potential ROE adjustment would be considered in NorthWestern's next electric rate review following the completion of the pilot.

4. Contingent upon implementation of the FCRM pilot, the Stipulating Parties support the use of both the Total Resource Cost Test and Utility Cost Test for electric DSM measure and program cost-effectiveness calculations. If measures and/or programs pass either test at a threshold of 0.9 or above (including the 10% adder), they shall be considered cost-effective. The Stipulating Parties agree that if any measures and/or programs fail to meet cost-effectiveness after the 2020-2021 program year and the reason the programs are not cost-effective is due to matters other than ramping costs, NorthWestern shall make best efforts to implement changes that result in such measures and/or programs becoming cost-effective, including but not limited to: increased/decreased incentive levels, administrative costs/investments changes, increased/decreased marketing, etc., and if unable to achieve cost-effectiveness, such measures and/or programs will be removed from the electric DSM offerings.

The Agreement resolves all issues raised by the Stipulating Parties regarding the Settled Issues.

Except as specifically noted below, no individual Stipulating Party's position in this docket is accepted by any other Stipulating Party by virtue of its entry into this Agreement, nor does it indicate any Stipulating Party's acceptance, agreement, or concession to any rate making principle or legal principle embodied or arguably embodied in this Agreement.

The Stipulating Parties stipulate to the admission into the evidentiary record of all pre-filed testimony and exhibits of the witnesses for the Stipulating Parties to support the reasonableness of the Agreement and shall refrain from cross-examining any remaining witnesses of the Stipulating Parties regarding the Settled Issues. The Stipulating Parties shall each call one witness at hearing to support this Agreement.

The various provisions of this Agreement are inseparable from the whole of the agreement between the Stipulating Parties. The reasonableness of the proposed settlement set forth in this Agreement is dependent upon its adoption, in its entirety, by the Commission. If the Commission declines to approve this Agreement as agreed to herein by the parties, or if the Commission adds or removes any terms or conditions not agreeable to the parties, either party shall, at its sole option, have the right to withdraw from this Agreement with all of its rights reserved. The Agreement and all its parts shall then be null and void, and the parties shall not be bound by any provision of it, and it shall have no force or effect whatsoever. In such event, the existence or terms of this Agreement shall not be admissible in any proceeding before the Commission or any court for any purpose.

The Stipulating Parties acknowledge that this Agreement is the result of a voluntary, negotiated settlement between them pursuant to ARM 38.2.3001, and agree that this Agreement, inclusive of the compromises and settlements contained herein, is in the public interest.

This Agreement may be executed in one or more counterparts and each counterpart shall have the same force and effect as an original document, fully executed by the Stipulating Parties. Any signature page of this Agreement may be detached from any counterpart of this Agreement without impairing the legal effect of any signatures thereon, and may be attached to another counterpart of this Agreement identical in form hereto but having attached to it one or more signatures page(s).

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Service Date: June 17, 2020

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

IN THE MATTER OF the Application by NorthWestern Energy for Authority to Increase Retail Electric Utility Service Rates and for Approval of Electric Service Schedules and Rules and Allocated Cost of Service and Rate Design	)))))))	REGULATORY DIVISION DOCKET NO. 2018.02.012

NOTICE OF COMMISSION ACTION

On September 28, 2018, NorthWestern Corporation d/b/a NorthWestern Energy ("NorthWestern") filed its Application for Authority to Increase Retail Electric Utility Service Rates and for Approval of Electric Service Schedules and Rules and Allocated Cost of Service and Rate Design ("Application") with the Montana Public Service Commission ("Commission").

The Commission issued Final Order No. 7604u on December 20, 2019. In the Final Order, ¶ 364 required NorthWestern to create a Demand-Side Management ("DSM") stakeholder group to make recommendations on NorthWestern's DSM programs, as outlined in the *Stipulation and Settlement Agreement of NorthWestern Energy and the Northwest Energy Coalition* ("Stipulation"). The DSM advisory stakeholder group is to be a group of no more than 10 people, including representatives from the Northwest Energy Coalition, the Montana Consumer Counsel, and the Commission. The group was directed to make recommendations to NorthWestern for its 2020-2021 DSM program year, addressing issues such as branding, methods of marketing, cost-effectiveness calculations, and energy savings estimates.

When the Final Order was issued, the Commission had concern that there was not enough time to implement recommendations from the DSM stakeholder group prior to July 1, 2020, the scheduled start of NorthWestern's 2020-2021 DSM program year. The Commission, therefore, required NorthWestern to report to the Commission by May 1, 2020, regarding the progress of the DSM stakeholder group, and allowed NorthWestern the option to request an extension in the filing deadline and to incorporate recommendations of the stakeholder group into the development of program offerings for the 2021-2022 DSM program year rather than the 2020-2021 program year.

On May 18, 2020, NorthWestern filed a request that the DSM stakeholder group be convened to review and make recommendations for consideration in the development of programs for the 2021-2022 DSM program year. NorthWestern finalized its Updated Electric Potential Assessment in January 2020 and developed a potential participant list; however, due to impacts of the COVID-19 pandemic on NorthWestern's conduct of business, no further development has occurred with the DSM stakeholder group. NorthWestern believes there is insufficient time to complete the DSM stakeholder process by the start of the 2020-2021 DSM program year on July 1, 2020.

The Commission concurs that there is not enough time for the DSM stakeholder group to develop recommendations prior to July 1, 2020, for the 2020-2021 DSM program year. In order for the DSM stakeholder group to re-envision NorthWestern's DSM program offerings, as described in the Stipulation, it will need sufficient time to fully develop recommendations. The Commission GRANTS NorthWestern's request to convene the DSM stakeholder group to review and make recommendations for consideration in the development of DSM programs for the 2021-2022 DSM program year. The Commission expects NorthWestern to convene the DSM stakeholder group as soon as possible to begin discussions and to provide an update to the Commission on the group's initial discussions and tentative timeline for future meetings by **September 1, 2020**.

DONE AND DATED this 16th day of June, 2020, by a vote of 5-0.

BY THE MONTANA PUBLIC SERVICE COMMISSION
BOB LAKE, Chairman
BRAD JOHNSON, Vice Chairman
ROGER KOOPMAN, Commissioner
TONY O'DONNELL, Commissioner
RANDALL PINOCCI, Commissioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Notice of Commission Action issued on June 17, 2020 in Docket 2018.02.012 was served upon the following by mail and email to the addresses listed:

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Dated: June 17, 2020

/s/*Sydney Kessel*

Sydney Kessel, Administrative Assistant