

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Northern Illinois Gas Company	)	
d/b/a Nicor Gas	)	
	)	Docket No. 20-0606
Proposed Revenue-Neutral Tariff Filing to	)	
Address Issues Arising From the Storage Study	)	
Presented in Docket No. 18-1775.	)	

**VERIFIED EMERGENCY MOTION TO REOPEN  
ON THE COMMISSION’S OWN MOTION AND FOR  
INTERIM ORDER ON BEHALF OF THE ILLINOIS COMPETITIVE  
ENERGY ASSOCIATION AND RETAIL ENERGY SUPPLY ASSOCIATION**

The Illinois Competitive Energy Association (“ICEA”) and the Retail Energy Supply Association (“RESA”), move on an emergency basis pursuant to Section 200.190 of the Illinois Commerce Commission’s (“Commission”) Rules of Practice (83 Ill. Admin. Code § 200.190) for the Commission to reopen the above-captioned docket on its own motion pursuant to Section 200.900 of the Commission’s Rules of Practice (83 Ill. Admin. Code § 200.900) and to issue an interim order directing Nicor Gas to file new tariffs delaying elimination of Rider 25 until certain implementation issues, which threaten to severely harm customers and third-party natural gas supplier (“supplier”) operations, can be resolved.

Simply put, despite or without regard to the good faith efforts by member companies of ICEA and RESA to work with Nicor Gas on implementation of its new storage tariffs approved on May 13, 2021 in the above-captioned docket, Nicor Gas has demonstrated it is not ready to implement elimination of Rider 25 by the deadline of May 1, 2022. ICEA and RESA thus urge the Commission to exercise its discretion and provide interim relief on this Motion (or, in the alternative, after such limited proceedings as the Commission may direct) and order Nicor Gas to file tariff modifications to delay elimination of Rider 25 until the serious implementation gaps can be fully addressed. Specifically, failure to order interim relief in the form of temporary delay to

the implementation date of May 1, 2022 may lead to serious harm to Nicor Gas ratepayers, suppliers, and even Nicor Gas itself.

## I.

### **BACKGROUND AND INTRODUCTION**

#### **A. Procedural History**

The present docket opened in June 2020 with Nicor Gas proposing massive changes to its approach to Transportation Customer use of storage in addition to other changes including elimination of Rider 25. The Commission approved the Storage Tariffs on May 13, 2021. ICEA and RESA, along with IIEC, timely sought rehearing and a stay, both of which were denied by the Commission. ICEA, RESA, and IIEC appealed the Commission's Final Order, where the matter has been fully briefed and is awaiting decision by a panel of the Second District.

Meanwhile, without a stay of the Commission's May 13, 2021 Final Order, Nicor Gas began to implement its tariffs in anticipation of a May 1, 2022 implementation deadline. However, as described in detail *infra*, Nicor Gas is not prepared to meet that deadline and allowing Nicor Gas to go forward unprepared may lead to great harm to ratepayers, suppliers, and Nicor Gas.

ICEA and RESA understand that member companies of both trade associations have informed Nicor Gas of their concerns, including but not limited to a letter from a member company of both trade associations to Nicor Gas dated February 8, 2022 and attached hereto as Exhibit A. ICEA and RESA further understand that member companies of ICEA and RESA also informed Staff of their concerns with implementation by Nicor Gas, including but not limited to a letter from two member companies to Dr. David Rearden dated February 28, 2022 and attached hereto as Exhibit B.

As of the filing of this Emergency Motion, Nicor Gas filed a Petition for Special Permission (ICC Docket No. 22-0269) to delay implementation of certain of the tariff changes approved in the above-captioned docket. Nicor Gas sought the delay due to implementation concerns, specifically related to development of IT systems that remained ongoing as of Nicor Gas's filing. (See ICC Docket No. 22-0269, Petition dated March 30, 2022 at 2-3.)

If granted by the Commission, Nicor Gas's proposed delay to implementation of certain storage tariffs would address some of the issues raised by ICEA and RESA to Nicor Gas and Staff. However, Nicor Gas's Petition for Special Permission did not address ICEA or RESA's Rider 25 concerns, which are described more fully below.

ICEA and RESA stress that while their (and IIEC's) appeals are ongoing, this Emergency Motion for Reopening is separate and apart from that appeal. This Emergency Motion for Reopening does not take substantive issue with the May 13, 2021 Final Order. Instead, this Emergency Motion urges the Commission to stop Nicor Gas from implementing a program that it has demonstrated it is not ready to implement to the detriment of all participants. While ICEA and RESA continue to seek substantive relief in the Appellate Court, this Emergency Motion for Reopening merely seeks temporary relief to allow Nicor Gas sufficient time to prepare for implementation.

## **B. Legal Standard**

Section 200.900 of the Commission's Rules of Practice provides that:

After issuance of an order by the Commission, the Commission may, on its own motion, reopen any proceeding when it has reason to believe that conditions of fact or law have so changed as to require, or that the public interest requires, such reopening. No party may petition the Commission to reopen on its own motion until after the time to petition for rehearing has expired.

(83 Ill. Admin. Code § 200.900.) The time to petition for rehearing expired not later than October 4, 2021—30 days after the Commission issued its Order on Rehearing—so ICEA and RESA’s Emergency Motion for Reopening is timely.

As described in detail below, both the facts and circumstances have changed since the May 13, 2021 Final Order and the public interest requires reopening. The Commission could not have known at the time of the May 13, 2021 Final Order the status of implementation in April 2022, nor did the record provide a basis to anticipate Nicor Gas would fail to implement the Storage Tariffs in a timely fashion. As demonstrated *infra*, the lack of development by Nicor Gas may lead to harm to participants in Nicor Gas’s Transportation program, which includes both ratepayers and suppliers in addition to Nicor Gas itself.

## II.

### **NICOR GAS’S FAILURE TO ADDRESS ISSUES CREATED BY ELIMINATION OF RIDER 25**

As explained *infra*, issues attributable to Nicor Gas or implementation responsibilities of Nicor Gas will cause suppliers and Rider 25 customers harm.

On information and belief, on or about December 7, 2021 during a webinar Nicor Gas explained publicly for the first time some aspects of the transition of Rider 25 customers to Rate 74 that would have adverse consequences. ICEA and RESA note that the Commission specifically relied on the existence of AMI infrastructure to approve elimination of Rider 25. (*See* Final Order dated May 13, 2021 at 45 (“Because of Nicor Gas’ usage of Advanced Metering Infrastructure, Rider 25 is not necessary since the Company can read meters daily”).) Consequently, monthly read (and cycle-billed) Rider 25 was to be eliminated and any existing Rider 25 customers not making a proactive selection of another service option, were to be transferred to daily read Rate 74 which, since its inception, has been invoiced on a calendar month basis due to the underlying

structure of the gas industry. However, Nicor Gas intends to now create a cycle-billed Rate 74 for legacy Rider 25 customer in spite of cycling billing being inconsistent with traditional daily read transportation service. ICEA and RESA note that the Commission's May 13, 2021 Final Order approved elimination of Rider 25, it did not specifically approve the details of its implementation; that is, the Commission did not approve Nicor's decision to bill customers moving from Rider 25 to Rate 74 on a cycle billing basis, rather than a calendar month basis.

ICEA and RESA fear that transition from Rider 25 (which settles on one schedule) and Rate 74 (which settles on a different schedule) will cause seams issues after the cutover date that may involve customer disruption. For instance, the letter to Nicor Gas attached in Exhibit A demonstrates that legacy Rider 25 customers will be billed on a different basis and on a different cycle depending on the pool in which a customer is placed. This leads to a potentially bad outcomes for legacy Rider 25 customers (whose billing and balancing services will be interrupted) and suppliers (whose ability to manage under the new, restrictive tariffs will be compromised).

### **III.**

#### **NECESSITY OF INTERIM RELIEF**

ICEA and RESA raise the Rider 25 implementation issues so that the Commission may remedy them with the only practical remedy: more time. As explained above, Nicor Gas has not—the Rider 25 elimination implementation issues that it is nearly guaranteed to cause chaos for customers, suppliers, and Nicor Gas itself persist. ICEA and RESA seek no discipline of Nicor Gas or reconsideration of the decision to eliminate Rider 25 (neither ICEA nor RESA objected to the elimination of Rider 25 in the original proceedings). ICEA and RESA merely seek additional time to avoid the highly likely negative outcomes.

Of course, neither ICEA nor RESA can predict the future in quantifying the exact harms to ratepayers or suppliers from the elimination of Rider 25 without moving affected customers to calendar monthly billing (as all other Transportation Customers are already billed) rather than placing them as Nicor Gas intends on cycle-billing. ICEA and RESA urge the Commission to avoid a situation where these issues lead to harms that may not be quantifiable in advance but were foreseeable and instead lead to complaints against or disciplinary review of Nicor Gas or others. The interim relief requested is designed to target a least-cost and least-impact solution to Rider 25 issues created by Nicor Gas's implementation to date.

#### **IV.**

#### **CONCLUSION**

As demonstrated by Nicor Gas itself by filing the petition in Docket 22-0269, Nicor Gas is not ready to implement many aspects of the tariffs approved in the above-captioned docket. While Nicor Gas correctly requests to delay implementation of many of its transportation tariffs, it does not seek to delay the elimination of Rider 25 even though it is not prepared to do so in a manner that avoids major problems for customers and suppliers. Thus, ICEA and RESA support the Nicor Gas Petition for Special Permission in all aspects except one – the current plan of Nicor Gas to eliminate Rider 25 on May 1, 2022 with affected customers being cycle-billed. The Commission should immediately reopen the present docket and direct Nicor Gas to file tariffs delaying elimination of Rider 25 so that Nicor Gas and ICEA and RESA can work out technical details—either by agreement or by litigation in this docket. While ICEA and RESA continue to have substantive disagreements with the tariffs approved in this docket, this Emergency Motion for Reopening and the relief requested does not address any substantive issues and solely focuses on

providing Nicor Gas and stakeholders the implementation time necessary to resolve the current lack of preparedness.

WHEREFORE ICEA and RESA respectfully request that the Commission on an emergency basis reopen the present docket on its own motion and immediately in an interim order (or after such limited process as the Commission may determine is necessary) direct Nicor Gas to submit tariffs to delay implementation of the elimination of Rider 25 until the preparation issues (including those identified *supra*) are resolved, and grant such other relief as may be required.

(Signature page follows)

Respectfully submitted,

April 13, 2022

Illinois Competitive Energy Association

By: /s/ Michael R. Strong  
One of its Attorneys

Michael R. Strong  
Funkhouser Vegosen Liebman & Dunn Ltd.  
55 W. Monroe Street, Suite 2300  
Chicago, IL 60603  
(312) 701-6800  
mstrong@fvldlaw.com

Retail Energy Supply Association

By:   
One of its Attorneys

Gerard T. Fox  
Law Offices of Gerard T. Fox  
203 N. LaSalle St., Suite 2100  
Chicago, IL 60601  
(312) 909-5583  
gerardtfox@gerardtfoxlawoffices.com

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**EXHIBIT A**



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February 8, 2022

Mary Lou Grzenia  
Regulatory Affairs  
Nicor Gas Company  
1844 Ferry Rd  
Naperville, Illinois 60563

Re: Nicor Gas Storage Implementation, ICC Docket No. 20-0606

Dear Mary Lou,

On behalf of NRG Energy, Inc. ("NRG") and Constellation New Energy – Gas Division LLC ("Constellation"), I am writing to seek clarification from Nicor Gas ("Nicor") regarding its proposed implementation of tariff changes as approved in the above referenced Illinois Commerce Commission ("ICC") docketed proceeding. As you know, both NRG and Constellation participated in the proceeding as part of the Illinois Competitive Energy Association ("ICEA") and have the following questions, in order of priority to NRG and Constellation, regarding Nicor's proposed gas storage tariff changes and their implementation:

1. **Invoicing of Rider 25 Accounts** – NRG and Constellation are disturbed with our understanding of how Nicor plans to approach invoicing Rider 25 accounts upon elimination of that Rider. Typically, transportation service, except for Rider 25 cycle billing, is done via calendar billing. In the proceeding, Nicor's statements that upon elimination of Rider 25 existing customers would move to Rate 74, or other options as desired by the customer, created the understanding that these cycle billed accounts would become eligible for Rider 13 and would be monthly invoiced especially as they were also going to be provided AMI readings to facilitate calendar month invoicing. Indeed, the benefits of calendar month billing over cycle billing for gas transportation service was why there was not greater opposition to the elimination of Rider 25 by suppliers. As our customers naturally would prefer their utility distribution bill to arrive at the same time as their supply bill, we'd like to understand more Nicor's proposed approach to aligning the bill timing with the various processes previously in place. For example, under Nicor's proposal to have certain Rider 13 groups monthly invoiced and others cycle-billed, depending on what Rider 13 pool customers are placed in will determine whether they are cycle or monthly billed. These customers are on the same rate class but are being treated differently; we believe customers on the same rate and rider should see a similar service and experience. The distinction, however, will cause problems with enrollments and terminations by causing confusion with cycle billing and end of the month cash out requirements. Moreover, moving between a supplier's Rider 13 pool will be more difficult if, say, Rider 13 A pool cycle ends on



the 5th of month and Rider 13 B pool starts on the 20th, what happens with regard to that customer for the intervening 15 days? It is not reasonable to expect customers to be standalone accounts for this amount of time and be potentially exposed to the daily balancing requirements as single accounts. And because in this scenario the gas coming from the storage of Rider 13 A won't line up with the storage going into Rider 13 B, we don't think the billing cycle will align with balancing requirements not to mention the potential for customer confusion on their bills. The confusion and harm to customer by having customers split between cycle and calendar month bills are unacceptable when Nicor should simply bill all such customers on a calendar bases as it has done from the inception of this service.

Finally, NRG and Constellation seek clarification around how Nicor plans to consolidate Rider 25 customers into Rider 13 pools on May 1. With the daily balancing restriction, suppliers will want to have as large, and as few, Rider 13 pools as possible. We believe this will need to be determined prior to May 1 in order to line the pools up, especially with the new balancing rules and to avoid different billing cycles.

2. **Nominations for Customer Select** – NRG and Constellation are concerned about nomination procedures going forward for accounts in Customer Select. As we understand it, Customer Select will no longer have a daily delivery obligation (DDO), but instead will have AMI and an AGS will be responsible for their own forecasting. Moreover, when these tariff changes go into effect, AGS will not have had sufficient opportunity to look at the portal that provides critical usage data and thus no time to adequately prepare forecasting for Customer Select accounts. Questions we have include, but are not necessarily limited to: what does the portal look like?; what is its functionality vis a vis end user ease?; does it provide historical usage?; will Nicor provide information (such as a base and slope) on the portal to run calculations?; and will Nicor provide the same type of daily telemetry as AGS get for commercial and industrial customers today? These issues make it very difficult to know whether AGS can seamlessly move into that new portal environment and when AGS testing and system enhancements may be too late.
3. NRG and Constellation are concerned that the new daily balancing rules will enable Nicor to institute caps and limits that have the unintended consequence of causing difficulty for suppliers to balance their customer needs or subject them to cash out requirements and penalties. As Nicor is aware, it can be difficult for suppliers to obtain replacement gas on other pipelines in an intraday situation. Thus, NRG and Constellation seek clarification from Nicor on how these new daily balancing rules will be applied and enforced given the realities of gas supply management.



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4. NRG and Constellation are concerned with Nicor charging nomination fees regardless of the reason nominations may be reduced. There are reasons a nomination may be reduced outside the control of the suppliers. For example, upstream supply cuts or allocations. These, coupled with Nicor's new daily balancing rules and potential caps/limits on what can be pulled from storage, have the potential to create a very difficult and expensive situation for suppliers that does not seem fair. We propose that only nomination reductions/changes initiated by the supplier be subject to the nomination fee and after careful consideration of all factors which caused the nomination to be reduced.

NRG and Constellation appreciate the opportunity to raise these concerns with Nicor and are available to discuss further at Nicor's convenience. We are now less than three months away from implementation and are troubled that key elements of implementation have not been shared or, in the case the Rider 25 elimination, there is apparently a plan that is highly problematic for suppliers. Certain changes, such as the new requirement for suppliers to forecast for Customer Select, are lacking in that we are nearing the effective date yet do not have access to the usage portal and data in order to develop our own forecasting tools and protocols to ensure we are able to seamlessly take over the forecasting responsibilities on May 1<sup>st</sup>. Please email me at [Robert.gibbs@nrg.com](mailto:Robert.gibbs@nrg.com) or call me at 908-323-0490 to discuss further.

Very truly yours,

Robert L. Gibbs  
Director, Government Affairs

RLG/\*

Cc: John Mehling, NRG  
Darcy Fabrizious, Constellation

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**EXHIBIT B**

February 28, 2022

Dr. David Rearden  
Senior Economist  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, Illinois 62701

RE: Docket No. 20-0606 – Northern Illinois Gas Company d/b/a Nicor Gas Company – Proposed Revenue-Neutral Tariff Filing to Address Issues Arising From the Storage Study Presented in Docket No. 18-1775 (tariffs filed on June 30, 2020)

Dr. Rearden:

As you know, the Commission's Final Order in Docket No. 20-0606, filed May 13, 2021, found that, consistent with Nicor Gas' requested timeline in the proceeding, that "Nicor Gas Company's proposed tariff changes should be approved and implemented, as modified above, effective May 1, 2022."<sup>1</sup> We are now two months from the May 1, 2022 tariff implementation date. For months our operations teams have pressed Nicor Gas for details about the implementation plan for these tariff changes.

On December 7, 2021 Nicor Gas hosted a Transportation Program Update during which it committed to providing Supplier Updates in February, Supplier Training in March, with Supplier Testing occurring in late March. During the December 7<sup>th</sup> presentation, Nicor Gas only accepted written questions, which it then emailed responses to suppliers on December 17<sup>th</sup>. Among other items, one particularly alarming statement under the Decommission of Rider 25 Groups segment of the presentation was that "The Billing Cycle for the converted group with [sic] remain the same."<sup>2</sup>

Due to ongoing implementation questions and concerns, NRG Energy, Inc. ("NRG") and Constellation New Energy – Gas Division, LLC ("CNEG") jointly sent the attached letter on February 8<sup>th</sup> to Ms. Mary Lou Grzenia in Regulatory Affairs for Nicor Gas identifying our highest priority concerns. Subsequently, on February 16<sup>th</sup>, a call was held between Nicor Gas, NRG and CNEG to review items raised in the February 8<sup>th</sup> letter. In advance of that call Nicor Gas provided attendees with bulleted points in response to the NRG/CNEG letter, along with screen shots from the supplier portal. We had some very productive discussion during the call; however, Nicor Gas was unable to make any commitment beyond taking our concerns back for further internal review. On Friday afternoon, February 25<sup>th</sup> Ms. Grzenia confirmed that Nicor Gas continues to look into a few things and is expected to respond to NRG and CNEG this week.

From our perspective, Nicor Gas has had nearly a year to prepare for these major tariff changes as the ICC Final Order was issued last May – more if you consider that Nicor Gas filed its application for these changes on July 29, 2020. Nicor Gas plan is for supplier training and testing in March, which leaves a supplier with approximately one month before implementation to complete all its necessary internal changes, when as of February the only details we had from the supplier portal were a handful of screen

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<sup>1</sup> ICC Docket No. 20-0606, Final Order dated May 1, 2020 at page 47.

<sup>2</sup> Nicor Gas Transportation Program Update, dated December 7, 2021 at page 31.

shots. While undoubtedly Nicor Gas had much IT work and system changes to undertake in preparation for these tariff changes, however, their plan left next to no time for suppliers, after they have all the final information and details from Nicor, to complete their own internal company IT and system work to assure a successful transition.

Further, Nicor Gas made a unilateral decision relative to its elimination of Rider 25, that rather than transition these customers to the same Rate 74 service as existing customer, to instead create a new version of Rate 74 service that is cycle billed, because it was easier for Nicor Gas to implement a cycle billed version of Rate 74 in spite of never revealing this key detail during the docket which assuredly would have been met with strong opposition from several parties in the proceeding. While Nicor Gas claims it is to lessen the disruption to customers, had Nicor Gas only reached out to suppliers to validate their assumption, Nicor Gas would have learned introducing a cycle-billed Rate 74 service creates great disruption due to the way in which the competitive gas industry works. So while Nicor Gas as elected to make it easier on itself, it has done so by creating a quagmire of problems for suppliers and their legacy Rider 25 customers.

While we continue to work with Nicor Gas, because we are now only two months from the effective date of these substantial tariff changes, we felt it necessary to make you aware of our unresolved concerns and the ongoing dialogue we are having with Nicor Gas. Hopefully our February 16<sup>th</sup> meeting with Nicor Gas will produce some favorable results, however, as we don't know what Nicor Gas' response will be we wanted to give you a heads up on the situation as the May 1<sup>st</sup> changes are substantial for both Customer Select and C&I customers and since at this late date we lack confidence that it will be a smooth transition.

Please contact us if you have questions or would like to discuss this matter. Otherwise, we intend to provide you with an update once we hear back from Nicor Gas.

Sincerely,

Robert L. Gibbs  
Director, Government Affairs  
NRG Energy, Inc.

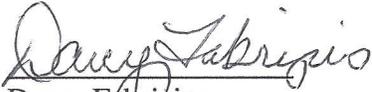
Darcy Fabrizious  
Sr State Government Affairs Manager  
Constellation New Energy – Gas Division, LLC

#### Attachments

Nicor Gas Transportation Program Update, dated December 7, 2021  
NRG and CNEG letter to Nicor Gas, dated February 8, 2022  
Nicor Gas Meeting Materials, dated February 16, 2022 (2 documents)

**VERIFICATION BY CERTIFICATION**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements in Sections I.A and II set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

  
Darcy Fabrizius

**VERIFICATION BY CERTIFICATION**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument (except as verified by others) are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

*Kevin K. Wright*  
Kevin K. Wright

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**NOTICE OF FILING**

Please take notice that on April 13, 2022, the undersigned, an attorney, caused the Verified Emergency Motion to Reopen on the Commission’s Own Motion and for Interim Relief on Behalf of the Illinois Competitive Energy Association and Retail Energy Supply Association to be filed via eDocket with the Chief Clerk of the Illinois Commerce Commission in the above-captioned proceeding:

April 13, 2022

/s/ Michael R. Strong  
Michael R. Strong

**CERTIFICATE OF SERVICE**

I, Michael R. Strong, an attorney, certify that copies of the foregoing document(s) were served upon the parties on the Illinois Commerce Commission’s service list as reflected on eDocket via electronic delivery from 55 W. Monroe Street, Suite 2300, Chicago, IL 60603 on April 13, 2022.

/s/ Michael R. Strong  
Michael R. Strong