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July 13, 2023

Energy Facility Site Evaluation Council v.

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1	ENERGY FACILITY SITE EVALUATION COUNCIL
2	
3	Desert Claim Wind Project
4	Request to Amend Site Certification Agreements
5	Informational Public Meeting
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7	
8	July 13, 2023
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L2	Via Teams Video Conferencing
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24	Reported by: STEVEN B. CRANDALL, CER
25	Certified Electronic Reporter #1198

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              (Meeting called to order at 5:00 p.m.)
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                   CHAIR DREW:
                                Good evening.
                                                This is
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     Kathleen Drew, chair of the Washington Energy Facility
     Site Evaluation Council, calling this meeting to order.
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     This is the informational public meeting pursuant to
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     Washington Administrative Code 463-66-030 regarding the
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     Desert Claim Wind Power Project and their amendment
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     request. We will hear from the certificate holder and
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     EFSEC staff about the process and then we will move to
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     any public comments.
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              Ms. Grantham, will you call the role?
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                   STAFF GRANTHAM: Certainly. Department of
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     Commerce.
15
                   KATE KELLY:
                                Kate Kelley, present.
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                                    Department of Ecology.
                   STAFF GRANTHAM:
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                   ELI LEVITT:
                                Eli Levitt, present.
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                   STAFF GRANTHAM:
                                    Department of Fish and
19
     Wildlife.
20
              (No response.)
21
              Department of Natural Resources.
22
                   LENNY YOUNG:
                                 Lenny Young, present.
23
                   STAFF GRANTHAM:
                                    Utilities and
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     Transportation Commission.
                   STACEY BREWSTER:
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                                     Stacey Brewster,
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1	present.
2	STAFF GRANTHAM: Assistant Attorney
3	Generals. Jenna Slocum.
4	(No response.)
5	John Thompson.
6	JON THOMPSON: Jon Thompson is present.
7	STAFF GRANTHAM: Administrative Law Judge,
8	Dan Gerard.
9	JUDGE GERARD: Present.
10	STAFF GRANTHAM: For council staff, Sonia
11	Bumpus.
12	(No response.)
13	Ami Hafkemeyer.
14	AMI HAFKEMEYER: Present.
15	STAFF GRANTHAM: Amy Moon.
16	AMY MOON: Amy Moon, present.
17	STAFF GRANTHAM: Stew Henderson.
18	(No response.)
19	Joan Owens.
20	JOAN OWENS: Present.
21	STAFF GRANTHAM: Dave Walker.
22	(No response.)
23	Sonja Skavland.
24	SONJA SKAVLAND: Present.
25	STAFF GRANTHAM: Lisa Masengale.

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1
              (No response.)
              Sara Randolph.
 2
 3
              (No response.)
 4
              Sean Greene.
              (No response.)
 6
              Lance Caputo.
 7
              (No response.)
              John Barnes.
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 9
                   JOHN BARNES: Present.
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                    STAFF GRANTHAM:
                                     Osta Davis.
11
                   OSTA DAVIS:
                                 Present.
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                    STAFF GRANTHAM:
                                     Joanne Snarski.
13
              (No response.)
14
                    STAFF GRANTHAM:
                                     Alex Shiley.
15
                   ALEX SHILEY: Present.
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                    STAFF GRANTHAM: Ali Smith.
17
              (No response.)
18
              And Karl Holappa.
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                   KARL HOLAPPA:
                                   Present.
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                   STAFF GRANTHAM:
                                     And do we have anyone for
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     the Counsel for the Environment present?
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                   BILL SHERMAN:
                                   Bill Sherman from the
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     Counsel for the Environment.
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                    STAFF GRANTHAM: Thank you, Bill. Chair,
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     there is a quorum.
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DAVE WALKER: And Andrea, this is Dave Walker. I am present. I couldn't get off mute.

Apologies.

STAFF GRANTHAM: Thank you, Dave. No worries.

CHAIR DREW: Thank you. So with that, we have the agenda in front of us and we will move on now to the certificate holder presentation. Go ahead.

RICK MILLER: Okay. Thank you very much, Kathleen. Good evening, chair, council members, EFSEC staff, members of the public, other members who just said they were present. Thank you for all taking the time to attend this public meeting for the Desert Claim Wind Project. We greatly appreciate everyone's time on this matter. We'd like to briefly describe, for those of you that are not familiar with the project, a little bit about it so that you could become more familiar with it and we can explain the rationale and basis for our request for an additional extension of time to complete the construction of the proposed project.

So, let me start by saying first, my name is Rick Miller. I am a senior development director at a company called EDF Renewables. We have been the owner and developer of the Desert Claim Wind Project, LLC project for several years, quite a long time, actually.

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And it's been our pleasure to work with EFSEC staff in the past and the local community in getting the most recent SCA approval completed. With me is my colleague, 4 Levi Cox. He is --KAREN MCGAFFEY: Why don't we advance the I think you're going to have to tell them, Rick. RICK MILLER: Oh, gotcha. Sorry. 7 Thank Levi Cox, thank you, is a project developer. He's relatively new to the Desert Claim Project, like some of the EFSEC members, so we're all on the same boat. Levi is an experienced developer and he is well versed in projects that have complicated permitting approvals and mitigation plans. He's most

southern California and Riverside County that are our 15

famously done several very large BLM projects in

solar PV. And he has some experience in wind as well.

We've been working together for almost 15 years.

So, I wanted to take this opportunity to introduce Levi Cox to the EFSEC members and the members of the public as he will likely become the lead developer for the project moving forward. And then, Karen McGaffey from Perkins Coie, who I think some of you know. She's been helping EDF Renewables with this project since its inception, a very long time. Helping to keep us on the straight and narrow and always

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appreciate her counsel.

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And so, I'm going to run through some of the project and then Karen can run through some of the SCA amendment requests and then we can answer any questions you might have.

Could you advance to the next slide, please.

So this is simply a project location map. The project is in Kittitas County in central Washington.

It's shown here on the map. The project has a maximum generating capacity of one hundred megawatts.

If we could turn to the next slide, please.

And I just want to say, if anyone has any questions, I don't mind taking questions as I go.

Otherwise, I'm going to just run through the slides but do not feel shy to raise your hand or ask me a question. I'm happy to stop, and pause, if a question arises.

More specifically, this project is located approximately eight miles north of the town of Ellensburg. The site is outlined there in blue. You can see Ellensburg there in the lower right hand corner. You see Interstate 90 running through on this map. You can see where Highway 97 runs north from I-90, just to the left of the project for orientation.

Next slide, please.

So the project is on approximately 4,000 acres.

The land is described generally as agricultural land. It's currently used for grazing, dry-land farming. The entire project area is designated as rural in the county's comprehensive plan and the individual parcels that make up the project are zoned either agricultural 20 or forest and range. The site area is relatively flat. It does rise gradually from the south to the north, gaining approximately 400 feet in elevation from front to back. There are six high-voltage transmission lines that run across the project, BPA and Puget Sound Energy lines. You sort of see them on the base map here.

So as folks know, you know, renewable energy, and wind specifically, is very site specific. This site -- one of the reasons why it isn't built yet -- is it suffers from relatively low wind resource. Not bad wind resource, but relatively low. It's not a screaming net capacity factor but it does have very close proximity to transmission. And the project substation will be located right under the PSE 230 kV line and we will line cap and break that 230 kV line. So it does have excellent transmission access.

On the next slide is simply a demonstration of a possible turbine layout. You know, a 100 megawatt project, the permit allows for up to 31 individual

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units. We showed several different figures in the 2018 EFSEC permit application. This is one of the possible configurations. Just, for what it's worth, each yellow dot is a turbine pad tower and generating unit with road and electrical collection being shown with the lines connecting the different units together. And then you'll see there's a project substation down there by what's shown as B12.

On the next slide -- we can always go back to anything if you want -- and the next slide is just to give context for EFSEC members that are not familiar with Desert Claim because it hasn't been heard by you all in quite a while now. These are some of the other projects that you might be familiar with that are in close proximity to the project. Immediately in front of the project, if you will, to the west is the Kittitas Valley Wind Power Project and then a smaller Sauk Valley Wind Project as well. And then, if you would, behind it to the east is the Wild Horse Wind Facility owned and operated by PSE. And then a little further back is the Vantage Wind Project.

So barring any questions, we can flip to the next slide. And this is when Karen gets to take it over and give you a little bit about the EFSEC process.

Thanks again for your time and attention to the slides.

I'm happy to come back and answer any questions you might have about the project.

KAREN MCGAFFEY: Okay. Thanks, Rick. And thank you, council, staff, and members of the public. I just want to give a little bit of context about the EFSEC process that has occurred. As many of you probably know, the Desert Claim Project has been on EFSEC's roster of energy facilities for some time now. EFSEC originally recommended approval of the project and the governor executed the Site Certification Agreement initially in 2010.

At that time, the company had proposed quite a large project. It would have been more than 5,200 acres. It would've had almost a 100 turbines. And it would've had a capacity of about 190 megawatts. As you -- so that was kind of the initial plan. Then in 2018, the company came back to EFSEC with a redesign project.

And Rick has kind of explained some of the details of that project. It's smaller. It takes up less area. It's only a third as many turbines with the maximum of 31. And it's only about half the capacity with a 100 megawatts.

Now, by reducing the size of the project, that significantly reduced the environmental impacts

associated with the project. And it also allowed the company to reduce the impacts on neighboring property owners by moving the turbines further away from neighboring residences.

So in 2018, when the company came to EFSEC with this redesigned project, EFSEC did a pretty rigorous review of that project. It started with the certificate holder submitting new environmental studies on all of the, sort of, different potential effects of the project. EFSEC staff sent a series of information requests to the applicant or to the certificate holder which they then provided additional information about the project.

Ultimately EFSEC developed a SEPA addendum associated with the redesign project and, of course, the council held hearings in the community. Back in the days when we actually went to the community and were able to meet in person. So it was a pretty robust project, a pretty robust process in 2018, and that resulted in amendment one to the Site Certification Agreement.

So if we could go to the next slide, please.

Now, for those of you who are familiar with EFSEC Site Certification Agreements for wind projects, the Desert Claim SCA looks pretty familiar. It

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incorporates the best practices for wind projects that have been developed over time. It also incorporates some agreements that were entered into with the Counsel for the Environment and other stakeholders throughout this process. So I think much of it will look familiar to you. It has a lot of, kind of, the similar features.

For example, before the company can begin construction of the project, it has to submit literally dozens of plans to EFSEC for review, detailed review, and approval. During construction, there are a lot of different measures and requirements to minimize and avoid environmental impacts and an environmental monitor is required. During operations, there are also various types of monitoring that were required. And there's a technical advisory committee or TAC like you have with, I believe, both The Kittitas Valley and Wild Horse Projects. So a lot of these things that you see in the Site Certification Agreement, I think, are very familiar and are similar to what you've seen in other wind project SCAs. What I want to assure you today is that the company is not requesting any changes to any of these provisions that were approved in 2018. What the company is really just requesting is an extension in the timeframe to complete construction of the project.

So if we can go to the next slide, I will pass

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it back to Rick to explain a little bit more about why you want the extension.

RICK MILLER: Right. Thank you, Karen. So in the -- in the existing permit approval, we're supposed to have construction substantially completed by November of 2023. In anticipation of not starting construction, we sent a letter on May 5th outlining a request for a 5-year extension. And the purpose for that, as Karen kind of alluded to, the project, we believe, has a very high likelihood of still succeeding and getting built.

What we're -- what we've been working on is a long-term energy contract with an offtaker such as a utility or a large C&I, commercial or industrial, customer. That's typically what you see for a wind project, a 15 or 20 year like power purchase agreement, for instance. And we're still marketing the project and attempting to secure that type of an agreement which would allow us the financial surety to begin the construction of the project, which is a relatively high capital intensive endeavor.

We think the project has a high likelihood of success. Maintaining the SCA and the EFSEC approval is paramount to our ability to do that, though. And as Karen said, we feel confident that the permit approval

and all the mitigation measures that were originally required will be -- can and would be complied with when we get the project off the ground.

You know, Washington state, I don't need to tell you, you're all in the forefront of it, but it is really leading the nation in the transition to a clean and decarbonized energy generation system. We believe Desert Claim Project can be a part of that future. We know that Washington state specifically is looking, you know, to almost -- they'll have almost double their electricity demand by the year 2050. So we know that the demand is there for a product like Desert Claim and we think that this 100 megawatt wind product will fit nicely into that energy mix for the state.

So it's our deep hope and desire that we can answer any questions you have and we can seek this 5-year extension to the permit allowing us a nice runway to continue to market the project, complete some of the other outstanding development items, such as finalizing and executing an interconnection agreement, which are still being worked out, for instance. So, you know, the development process is a long one but we are still dedicated to trying to see this one through to completion with your assistance. Of course, without being too wordy, I think that probably wraps up what I

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wanted to say and happy to answer any questions anyone might have.

CHAIR DREW: Council members, do you have any questions? Mr. Young.

LENNY YOUNG: Yeah. Without revealing or disclosing any proprietary information that you need to hold close. Could you briefly sketch out what kind of obstacles you're running into that are preventing you from being in a power purchase agreement right now?

RICK MILLER: Yeah, absolutely. I think it's a combination of factors. One, net capacity factor. The megawatt hours generated from a 100 megawatt project significantly impacts the megawatt hour price. And so, for instance, you know, a site that enjoys a 40 percent net capacity factor versus, like, a relatively low 30 percent net capacity factor will have a significant difference in power purchase price.

And this site does not enjoy what I would call a robust wind regime but a relatively steady and middle-of-the-road wind regime. And so it challenges the power price that the utility would pay to secure it. So at different times it looks more or less attractive compared to alternate -- to alternatives such as hydroelectric power or solar PV. And we went through a period of time recently where solar photovoltaics were

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going down in price precipitously and it was difficult for wind generation to compete in The Pacific Northwest with that. I think that pendulum is likely to swing back the other way, but that was one factor.

So technology type and a relatively challenged wind regime made the power purchase price a little difficult. I'd also don't mind saying that there are always -- you'll hear this a lot in renewable energy in general -- but the electrical grid was really set up at a time when renewables weren't even imagined. And there are a lot of transmission constraints on the system, on the native utility system, that make it difficult to move some of this power generation around and move it to load. And this area is somewhat cut off from the load centers to the west.

And so, with some of the host utilities and some other companies, we've ran into some challenges in our ability to move the power to their load and need, again, some of those upgrades are always happening. But I would say a -- in summary, kind of a combination of relatively high energy price, but everything's relative, and transmission constraints have added to the challenges in getting and securing a power purchase agreement.

LENNY YOUNG: Thank -- thank you. I

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really appreciate that explanation.

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CHAIR DREW: Any other questions from council members? Ms. Brewster.

STACEY BREWSTER: You mentioned the challenging wind capacity there. What capacity do you expect the Desert Claim to operate at?

RICK MILLER: It's a very fair question.

And the -- and it's generated by the way I answered the question. Different turbine generating technologies will garner different net capacity factors so, for instance, like, a smaller generating capacity machine of, like, two megawatts normally will garner a larger NCF and a larger generating capacity machine, like a three to four megawatt machine, would have a lower net capacity factor in comparison.

So, in this example, we're looking at a low 30 percent net capacity factor somewhere between, say, 30 and 33, 34 percent. And for comparison, for what it's worth, on the same type of scale, the center of the country -- the bread basket, if you will -- Oklahoma, Texas, areas that have a lot of wind, those are seeing sites that are almost 50 percent net capacity factor as a comparison tool. And in California, some of the areas in, like, the desert southwest are similarly in the low 30 percent and some of the robust wind areas in, like,

the Altamont would be, like, 40 to 45 percent net 1 capacity factor. I hope that's helpful. 2 3 CHAIR DREW: So is that not unusual in 4 Washington state, that net capacity factor? 5 RICK MILLER: It is not unusual, yeah. Not as bad as Arizona, where the wind does not blow at 6 all, but that net capacity factor for wind is relatively 7 low. And we like this site because of its setting and 8 9 we think the net capacity factor is robust enough to 10 eventually be a good economical project for rate payors 11 and helping to add to the decarbonization of the grid. 12 CHAIR DREW: Did you have another 13 question, Ms. Brewster? 14 STACEY BREWSTER: No. Thanks. Τ 15 appreciate the comparison because I'm thinking about 16 Kittitas Valley and Iron Horse nearby with similar 17 capacities. Thank you. Other questions from council 18 CHAIR DREW: 19 members? Okay. Hearing none. Thank you very much for 20 the presentation and we'll move on to Ms. Hafkemeyer 21 who's going to talk about our process. 2.2 AMI HAFKEMEYER: Thank you, Chair Drew. 23 Welcome, everybody. Thank you for making the time this 24 evening. My name is Ami Hafkemeyer, the Director of 25 Siting Compliance for EFSEC and I'll be giving a brief

presentation on the EFSEC amendment review process.

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A little bit of history about EFSEC. EFSEC was created in 1970 for the siting of thermal power plants. The intent was to create one-stop permitting agency for large energy facilities. EFSEC is comprised of state and local government members who review each application before voting to make a council recommendation to the governor. If recommending approval, the package to the governor includes a draft Site Certification Agreement, or SCA, which defines all preconstruction, construction, and operation plans. If approved by the governor's office, this decision preempts other state and local regulations.

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Multiple energy facilities fall under EFSEC's jurisdiction. Some projects are required to be sited through EFSEC such as nuclear facilities with the primary purpose of generating and selling electricity, thermal power plants greater than 350 megawatts, while others such as wind, solar, green hydrogen storage, or clean-energy manufacturing can opt into the EFSEC process. And there are a handful of other facility types that may also opt into the process as well.

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agencies. The chairperson is appointed by the governor and there are standing members from five other agencies appointed by those agencies to sit on the council. The current council is made up of Chairwoman Kathleen Drew, Eli Levitt from the Department of Ecology, Mike Livingston from the Department of Fish and Wildlife, Kate Kelly from the Department of Commerce, Lenny Young from the Department of Natural Resource, and Stacey Brewster from the Utilities and Transportation Commission.

There are additional agencies that may elect to appoint a council member during the review of a new application. These agencies are the Department of Agriculture, the Department of Transportation, the Department of Health, and the Military Department. For the review of an application amendment. This is not a part of the process. The standing council oversees those requests.

Next.

Here's a map of the facilities that are certificated or have applied for certification under EFSEC's jurisdiction. You can see, marked in green, there are six operating facilities, including two natural gas facilities, one nuclear facility, one solar

facility, and two wind facilities. If you'll recall from the previous presentation, the Kittitas Valley and Wild Horse wind facilities are EFSEC regulated facilities in the area but the other wind projects shown on that presentation did not elect to site through EFSEC and so they do not fall under our jurisdiction. The blue marks indicate the four additional facilities that are approved but not yet constructed, including the Desert Claim facility. The clear marker is the one facility in the process of decommissioning and EFSEC is currently reviewing applications for five projects marked in yellow.

Next please.

Here is a flowchart showing the general process go an applicant will through when they submit an application for a new facility. The Desert Claim proposal underwent this multitiered review at the time of application as described in the previous presentation. Additional State Environmental Policy Act or SEPA analysis was conducted at the time of the 2018 amendment request.

Next please.

The review process for an amendment differs from that of a new application. When an amendment request is received, an informational meeting is

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required, which brings us here this evening. With an administrative amendment, such as the one requested for this project, no SEPA addendum is required. Following the informational meeting, the council will review the request before them and vote to approve or deny the amendment. For decisions that substantially change the project, the recommendation is sent to the governor for final decision. For decisions that do not substantially change the project and/or are administrative in nature, this approval or denial may be decided by the council.

That concludes my presentation for this evening. I don't actually see any members of the public on the call but if there's anybody there who I'm not seeing on the attendance list, I would like to remind you how you can submit comments. You can indicate that you would like to speak this evening. If you're joining virtually or by phone, you may call the EFSEC main line at 360-664-1345 to be added to the speaker list. And you may also send in written comments by postal mail to our office, 621 Woodland Square Loop, PO Box 43172, Olympia, Washington 98504-3172. Comments may also be submitted to our online comment database at https://comments.efsec.wa.gov and that is up on the screen and there's a link available on our website as

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1 well. 2. CHAIR DREW: Mr. Sherman, you also have a 3 comment to make. Please go ahead. BILL SHERMAN: Thank you, Chair Drew. 4 Τ 5 quess I have a question. This is probably directed at Ms. McGaffey. I expect that there's no reason to 6 believe that the action that council may take would have 7 any effect on the stipulation that your client and 8 9 Counsel for the Environment came to in 2009, correct? 10 KAREN MCGAFFEY: Correct. 11 BILL SHERMAN: Great. That's my only 12 question. Thank you so much. 13 CHAIR DREW: At this point, Judge -- Oh, 14 Ms. Kelly. Go ahead. 15 KATE KELLY: Thank you, chair. And I only 16 meant to raise my hand once. The question I have is, 17 and I apologize if I might have missed it, is this -- is extension of the SCA for five years considered 18 19 legislative and -- a legislative or just an 20 administrative action in terms of the process that Amy 21 just described. 2.2 The process, it would be the CHAIR DREW: 23 council's decision. 24 KATE KELLY: Okay. That was my question. 25 CHAIR DREW: So, right. Right. To take

that into consideration, not administrative through the 1 staff, but through the council. 2 3 KATE KELLY: But not going to the 4 governor? 5 CHAIR DREW: Correct. Correct. Because only decisions that would make a substantial change in 6 7 the SCA -- only amendments that make substantial changes would go to the governor. 8 9 Okay. Thank you. KATE KELLY: 10 Any other questions? CHAIR DREW: 11 That is spelled out in AMI HAFKEMEYER: 12 That website is down so I don't have the our WAC. 13 citation for you this evening, but I can provide that. 14 So, I can access the information if you'd like. 15 CHAIR DREW: I think that's just Bill 16 Sherman and he asked his question, I believe. Unless 17 you have another question. 18 BILL SHERMAN: Oh, I'm sorry. I didn't 19 realize I hadn't lowered my hand. Thank you. 20 CHAIR DREW: That's okay. So Judge 21 Gerard, at this point, what I'll do is I'll ask if 22 there's anyone here who wants to make public comment 23 in -- and we'll go from there. Is there anyone on 24 this -- in this meeting, virtual meeting, who'd like to 25 make a comment? Asking again, is there anyone in this

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meeting who would like to make a comment? One final
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     time, is there anyone here who would like to make a
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     comment?
               Hearing none, we will see what comments may
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     come in through our other means of getting public
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     comments, but this public hearing is -- public
     informational meeting is adjourned. Thank you all.
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                 (Meeting adjourned at 5:33 p.m.)
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transcript is a full, true, and accurate trans	I, Steven B. Crandall, certify that the foregoing
	of the proceedings and testimony taken in the matter of
5	
6 7	That the foregoing meeting was taken before me, via Teams video conference, completed on July 13, 2023, and thereafter transcribed by me;
8	
9	That I am not a relative, employee, attorney, or
	employee of any such attorney or counsel, and that I am not financially interested in the said action or the
11	outcome thereof;
12	
IN WITNESS WHEREOF, I have hereunto set my signature on this 27th day of July, 2023.	
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18	STRUM
Steven B. Crandall, CER Certified Electronic Reporter	Steven B. Crandall, CER Certified Electronic Reporter #1198
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