**ADVISORS TO THE COUNCIL OF THE CITY**

**OF NEW ORLEANS**

**SEVENTH SET OF DATA REQUESTS TO**

**ENTERGY NEW ORLEANS, INC.**

**In Re: Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief CNO Docket NO. UD-16-02**

**Definitions**

1. “And” means and/or.
2. “Affiliates” has the meaning as defined in City Council Resolution R-01-676.
3. “Any” shall be understood to include and encompass “all.”
4. “Application” means the Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief and any supplemental applications thereto. “Supplemental Application” refers specifically to the Supplemental and Amending Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief, dated July 6, 2017.
5. “CNO” means City of New Orleans.
6. “Communications” means any verbal or written exchange of information between individuals, regardless of mode, and includes all verbal and written communications of every kind, including but not limited to, telephone calls, conferences, and correspondence, and all memoranda concerning the requested communications. Where a communication that is requested is not in writing, provide copies of all memoranda and Documents made relating to the requested communication and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and Documents provided.
7. “Company” means Entergy New Orleans, Inc.
8. “CT” means Combustion Turbine.
9. Documents.
   1. “Documents” or “Documentation” includes all writings and records of every type in your possession, control or custody, produced by any means, conveying visible and/or audible and/or electronic information, including, but not limited to: testimony and exhibits, memoranda, contracts, agreements, correspondence, emails, letters, reports (including drafts, preliminary, intermediate and final reports), statutes, ordinances, resolutions, articles, textbooks, treatises, pleadings, briefs, data responses currently or previously under the custody, care and/or control of plaintiffs, plaintiffs’ counsel and/or anyone acting on behalf of plaintiffs or plaintiffs’ counsel, surveys, analyses, studies, summaries, comparisons, tabulations, charts, books, pamphlets, photographs, maps, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data, computer files, computer tapes, computer inputs, computer outputs and printouts, vouchers, accounting statements, budgets, work papers, engineering diagrams (including “one-line” diagrams), mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise and drafts of any of the above.
   2. “Documents” or “Documentation” includes copies of Documents, where the originals are not in your possession, custody, or control.
   3. “Documents” or “Documentation” includes every copy of Documents which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy.
   4. “Documents” or “Documentation” also includes any attachments or appendices to any document.
10. “Each” shall be understood to include and encompass “every.”
11. “EAI” means Entergy Arkansas, Inc.
12. “ELL” means Entergy Louisiana, LLC
13. “EMI” means Entergy Mississippi, Inc.
14. “ENO” means Entergy New Orleans, Inc.
15. “Entergy Operating Companies,” or “EOC” means ENO, ELL, EAI, and EMI.
16. “Entergy” or “Entergy System” means Entergy Corporation (formerly Middle South Utilities), any affiliates or subsidiaries, any merged or consolidated predecessors in interest, past or present employees, officers, directors, agents, contractors, consultants, attorneys, and representatives, and any other person who has in the past or is now acting or purporting to act on its behalf.
17. “Enterprises” means Entergy Enterprises, Inc.
18. “EOI” means Entergy Operations Services, Inc.
19. “EPD” means Entergy Power Development Corp.
20. “EPI” means Entergy Power, Inc.
21. “ESI” means Entergy Services, Inc.
22. “Identify” or “Identifying” means:
    1. With respect to a natural person, the person’s full name, present employer, title, job description, and professional or home address.
    2. With respect to documents, the title (if any), nature, substance, date and source of origin on the document, all described with sufficient particularity to enable the document to be specified or recognized.
23. “Information” means any knowledge, fact, data, or intelligence whether contained in a Document or unrecorded.
24. “Interveners” means all parties who filed an intervention request with the Clerk of the Council, with a copy submitted to the Director of the Council Utilities Regulatory office, and whose interventions were subsequently granted.
25. “MCF” means thousands of cubic feet of natural gas.
26. “MISO” means Midcontinent Independent System Operator, Inc. or predecessor entities, its operations, its assets, its member organizations, its territory of operations, the territory of operations of its member organizations, Entergy operations within or under MISO authority, its marketplaces related to energy, its planning mechanisms, or other assets or operations related to MISO.
27. “MW” means megawatts.
28. “MWh” means megawatt hours.
29. “NOPS” means the New Orleans Power Station and all related plant as described in the Application.
30. “Or” means and/or.
31. “Parties” means ENO, CNO’s Advisors, and all parties to Docket No. UD-16-02.
32. “Person” includes any individual, corporation, business or governmental entity whatsoever, and every other type of entity or organization.
33. “Relating to” shall be understood to include pertaining to, referring to, having as its subject matter, constituting, supporting, analyzing, discussing, evaluating, or bearing upon, directly or indirectly the subject matter of the specific Request.
34. “Respondent” means ENO and any of its representatives including any other Entergy representative.
35. “RICE” means Reciprocating Internal Combustion Engine.
36. “SEC” means Securities and Exchange Commission.
37. “SERI” means System Energy Resources, Inc.
38. “SFI” means System Fuel, Inc.
39. “System Agreement” means the System Agreement revised January 16, 1992 among Arkansas Power & Light Company, Gulf States Utilities Company, Louisiana Power & Light Company, Mississippi Power & Light Company, New Orleans Public Service Inc., and Entergy Services, Inc., as most recently amended.
40. “Testimony” means any verbal or written declaration made under oath in connection with any regulatory, administrative or adjudicative proceeding or other judicial process or formal dispute resolution process (*e.g.* arbitration) for any purpose, including but not limited to depositions, hearings or trial.
41. “UPS” means the Union Power Station in Union County near El Dorado, Arkansas
42. “Publications” include, but are not limited to, articles, books, reviews, papers, presentations, studies, reports, analyses, or other documents released for publication.
43. “You” and “Your” means Entergy, ENO, any affiliates or subsidiaries, any merged or consolidated predecessors in interest, past or present employees, officers, directors, agents, contractors, consultants, attorneys, and representatives and any other person who has in the past or is now acting or purporting to act on its behalf.
44. As used herein, the singular shall include the plural and the plural shall include the singular.

**Instructions**

1. Data Requests, interrogatories, and requests for production of documents or any other discovery requests (collectively “Requests” or individually “Request”) call for all information, including information contained in documents, which is known or available to the Respondents in this proceeding.

2. Where a Request has a number of separate parts or aspects, a complete response is required to each part or aspect. The response should separately address each part by its individual designation: “(CNO 4-1)(a),” “(CNO 4-1)(b),” etc. Any objection to a part or aspect of a Request should clearly indicate the part or aspect to which it is directed.

3. If a Request specifically seeks an answer in response that is not contained in the Document, an answer is required.

4. The person who prepares and is responsible for providing the response should be identified on the response.

5. If a Request can be answered in whole or in part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other response or part or aspect thereof which is responsive to the instant Request and by specifying whether the response to the other request is a full or partial response to the instant Request. If the response to the other Request constitutes a partial response, the balance of the instant Request must be answered.

6. If a Request cannot be answered in full after exercise of due diligence to secure the information requested, state the answer to the extent possible, state why the Request cannot be answered in full, and state what information or knowledge you have concerning the unanswered portions.

7. If, in answering any of these Requests, you feel that any Request or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Request.

8. If a document requested is unavailable, identify the document, describe in detail the reasons that the document is unavailable, state where the document can be obtained, and specify the number of pages it contains.

9. If no document is responsive to a Request which calls for a document, then so state. In some instances, the Request should be treated as an interrogatory.

10. All responses to the Requests are to be amended or supplemented if any person answering the requests obtains information upon the basis of which: (a) the party making the response knows that it was incorrect when made and (b) the party making the response knows that the response, though correct when made, is no longer true or is misleading.

11. All Requests are considered to be continuing in nature, and thereby require you to produce by supplemental responses any document within the scope of the Request that you obtain, acquire, or discover subsequent to your initial response to the Request.

12. If the data or Documents responsive to a Request exist, to any extent, in a native electronic form (e.g., Excel file), provide the original native electronic file as part of your response. To the extent data or Documents responsive to any part of a Request may be extracted, saved, prepared, or presented in a tabular electronic format (e.g., Excel or Access file), provide that part of the response in a tabular electronic file (e.g., Excel or Access file).

**ADVISORS TO THE COUNCIL OF THE CITY**

**OF NEW ORLEANS**

**SEVENTH SET OF REQUESTS FOR INFORMATION TO**

**ENTERGY NEW ORLEANS, INC.**

**In Re: Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief CNO Docket NO. UD-16-02**

**UTILITY DOCKET NO. UD-16-02**

1. Please refer to the Supplemental Application and testimonies filed therewith. Please provide copies of all supporting documents, data, and workpapers related to each table, figure, exhibit, value, and calculation presented therein in its original electronic format with all formulas and data intact.
2. Please refer to the Supplemental Application, page 24, which says “Assuming that the Council adopts a 2018 FRP in the Combined Base Rate Case, in the next FRP proceeding, the selected project’s non-fuel revenue requirement would be realigned so as to be recovered through the FRP Rate Adjustment but outside the FRP bandwidth formula. In the FRP proceeding after that, the selected project’s associated revenues and nonfuel revenue requirement would be included in the FRP bandwidth formula and recovered through the FRP Rate Adjustment.” Please also refer to the Direct Testimony of Orlando Todd, the answer to question Q18 at page 8.
   1. Do Mr. Todd’s recommendations in his referenced testimony apply to the Supplemental Application and the Alternate Peaker? If no, please identify the witness sponsoring the recommendation in the referenced part of the Supplemental Application.
   2. Please discuss the regulatory principle and each reason why the selected project’s associated revenues and nonfuel revenue requirement initially should be outside a bandwidth formula when measuring the Company’s total revenue requirement at the Council’s the approved WACC.
3. Please refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, page 6 et. seq. and HSPM Exhibit SEC-10, which discuss and present ENO’s 2017 updated load forecast.
   1. Please provide all supporting data, including references, data sources, assumptions, and methodologies, related to the updated forecast.
   2. Please identify and quantify the effects of existing Energy Smart DSM programs through each year of the forecast.
   3. Please identify and quantify the effects of projected DSM programs to achieve on the Council’s 2% kWh reduction goal that are reflected in the referenced load forecast.
   4. Please identify and quantify the effects of planned PV solar and distributed energy resource additions, both ENO-owned, and customer-owned that are reflected in the referenced load forecast.
4. Please refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, the answer to question Q5 at page 5, which presents Table 1 and discusses ENO’s identified long-term planning needs while considering risk.
   1. Please define and discuss “risk” as used in Mr. Cureinton’s referenced testimony, including how risk was considered in quantitative terms.
   2. Please identify each category of risk to which Mr. Cureington refers.
   3. For each category of risk identified in the response to part b above, state its effect on the relative attractiveness of the reference and requested portfolios presented in Table 1.
5. Please refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, the answer to question Q8 at page 7, which says “Forecasts are subject to uncertainty; however, the Company relies on industry-standard tools and techniques to reduce that uncertainty to the extent possible.”
   1. Please describe what Mr. Cureington means by “industry-standard” in the referenced testimony.
   2. Please identify and describe each “industry standard tool” upon which ENO relies to reduce uncertainty.
   3. For each response part b, describe how the “industry standard tool” was used in developing the 2017 updated load forecast and quantify the tool’s effect on such.
   4. Please identify and describe each technique ENO employs to reduce uncertainty in its forecasts of demand and energy.
6. Please refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, the answer to question Q9 at page 8, which discusses causes for the changes in ENO’s load forecast.
   1. Please provide copies of all documents, data, and workpapers related to the sources of ENO’s load forecast changes identified in the referenced testimony.
7. Please refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, the answer to question Q10 at page 9, which discusses a 95% “confidence interval”.
   1. Please describe in detail the methodology used to construct or support a 95% confidence interval for ENO’s 2017 updated load forecast.
   2. Please provide all workpapers and data relied upon when constructing ENO’s 2017 load forecast related to Mr. Cureington’s referenced answer.
8. Please refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, the answer to question Q13 at page 11, which says: “The Company's planning principles outlined in my Direct Testimony support a balanced approach to resource planning that considers both cost and risk to customers in the provision of safe and reliable electric service.” Please also refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, Table 1 (HSPM) at page 5.
   1. Please identify and discuss each category of risk to customers taken into account in the Company’s planning principles referenced by Mr. Cureington.
   2. For each risk identified in the response to part a, please describe and quantify in terms of “total relevant supply cost” or “variance to least cost” the effects its impact on ENO’s relative ranking of the portfolios presented in Table 1.
   3. Is the risk that MISO PRA prices might not approach equilibrium over the mid-term a risk taken into account in the Company’s planning principles?
   4. If the answer to part c is in the affirmative, please explain how this risk is taken into account in the Company’s planning principles and the effect of this risk on the results of ENO’s resource planning.
   5. If the answer to part c is in the negative, please explain the reasons this risk not taken into account in the Company’s planning principles.
   6. Please provide copies of all documents, analyses, and workpapers related to the risk that MISO PRA prices might not approach equilibrium as forecasted.
9. Please refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, the answer to question Q37 at page 38, which says “In contrast, the estimated costs of the very aggressive, yet maximum achievable scenario were approximately $400 million.” The answer goes on to say: “Moreover, the estimated costs of that scenario exceed $1.4 billion over the 20-year period.” Please also refer to Exhibit SEC-14 (Navigant DSM potential study).
   1. Please provide copies of all documents, reports, and workpapers related to the referenced Exhibit, including workpapers related to the $400 million cost value presented on page 5.
   2. Please provide copies of all workpapers and supporting documents related to the referenced exhibit.
   3. Please provide copies of all documents, data, and workpapers supportive of or related to the referenced testimony.
   4. Please provide copies of all documents related to, supportive of, or budgeting a DSM program in New Orleans involving expenditures in the range of roughly $1.4 billion or more.
10. Please refer to the Supplemental Application at page 19, which says cost-effective storage does not exist at this time. Please also note that ENO currently operates a 1 MW solar/battery storage facility.
    1. Please define, quantify, and discuss “cost-effective” as it is used in the referenced statement.
    2. Please identify and provide copies of all documents upon which ENO relies in making the referenced statement.
    3. Please identify each storage technology ENO evaluated in making the referenced statement and provide copies of all analyses and documents related to ENO’s determination that it is not cost effective.
    4. Does ENO have an expectation of a timeframe in which cost-effective storage may exist?
    5. If the answer to part d is in the affirmative, please state the timeframe and the storage technology most likely to then be “cost-effective.”
    6. Please provide copies of all documents related to current or projected cost-effectiveness of storage.
    7. Is ENO’s 1 MW solar/battery storage facility “cost-effective.”
    8. If the answer to part h is in the negative, please describe the types of and dollar amounts of cost reduction required before ENO’s 1 MW solar/battery storage facility’s technology would be “cost-effective.”
11. Please refer to the Supplemental and Amending Direct Testimony of Seth E. Cureington, the answer to question Q25 at page 26, which discusses updated AURORA modeling runs.
    1. Is the AURORAxmp software used in support of Mr. Cureington’s referenced testimony the same version of such modeling software that was used in support of direct testimony in the instant docket?
    2. If the inputs used in support of Mr. Cureington’s AURORA model runs as part of his direct testimony were used in the AURORAxmp model used in support of his Supplemental Direct Testimony, would the results be materially the same?
    3. If the answer to part a or part b is in the negative, please provide a copy of the software’s changelog, describe changes to the software, and explain and quantify the effect of the changes on the output of modeling runs performed by ENO as presented in the Supplemental Application.
    4. For each of the AURORA modeling runs presented as part of Mr. Cureington’s Supplemental Direct Testimony and having an equivalent modeling run as part of Mr. Cureington’s Direct Testimony, please identify and quantify each input that has changed between the two testimonies.
12. Please refer to the Supplemental Direct Testimony of Seth E. Cureington, the answer to question Q17 at page 17, which discusses retirements and potential retirements or sources of capacity and which in part says, “The planned deactivations of those units are also assumed to occur during the planning horizon and could occur sooner than expected given the age of these units.”
    1. Please provide the most current projection by year of MISO-South Planning Resource Auction prices.
    2. Please identify and state the capacity of each capacity addition or deactivation by year that is reflected in the response to part a.
    3. Please identify and state the capacity and year of commercial operation of each capacity addition in the MISO-South region that ENO expects but is not reflected in the response to part a.
    4. Please identify and state the capacity and year of deactivation of each capacity deactivation in the MISO-South region that ENO expects but is not reflected in the response to part a.
13. Please refer to the Supplemental Direct Testimony of Seth E. Cureington, the answer to question Q20 at pages 21-22, which discusses ENO’s purchase of “unhedged” market purchase of energy in the summer of 2016 “approximately 30% of the time” and states that “Having NOPS in the Company's portfolio would provide a hedge against real-time shortages in generation that expose customers to the Load Zone LMP.”
    1. For each ENO purchase in the MISO energy markets (e.g., day-ahead, real time) from June 1-August 30, 2016, please provide in tabular format
       1. The date and time,
       2. The duration,
       3. The power purchased in in terms of MW by hour, and
       4. The LMP, subtotaled by MEC, MCC, and MLC.
    2. For each of the CT and RICE NOPS alternatives:
       1. Would generation by NOPS during the purchases identified in the response to part a have reduced ENO’s overall costs (i.e., purchase of energy at the LMP that would have prevailed had NOPS operated less net MISO receipts from the operation of NOPS)?
       2. If the answer to part i is in the affirmative, please quantify the amount of such savings in terms of total net costs to ENO, including NOPS’s sale of energy into the MISO market and the variable cost to operate NOPS.
    3. For each of the CT and RICE NOPS alternatives:
       1. During each of the MISO energy purchases identified in the response to part a, would the NOPS have operated (i.e., been dispatched)?
       2. If the answer to part i is in the negative, please identify and discuss each reason the unit would not have operated.
       3. If the answer to part i is in the affirmative, at what price in terms of dollars per unit of energy would ENO have bid NOPS’s generation into these MISO markets?
14. Please refer to the Supplemental Direct Testimony of Seth E. Cureington, the answer to question Q22 at page 24, which says “When the Ninemile units are committed by MISO for reliability (referred to by MISO as "Voltage and Local Reliability" or "VLR"), ENO's customers share in the variable cost to operate those units. Once NOPS is in service, it will provide an additional, more efficient source of generation to support reliability in DSG and is expected to displace some amount of generation currently provided by Ninemile 4 and 5, lowering costs for ENO's customers.”
    1. Please quantify the meaning of “some” from the referenced testimony in terms of MWh per year or percent of each of the referenced Ninemile units.
    2. Please provide copies of all documents, analyses, and workpapers related to NOPS’s displacement of Ninemile 4 and 5 for VLR purposes
    3. In Mr. Cureington’s workpapers and AURORA model runs, was the dispatch of the NOPS units reflective of a displacement of Ninemile 4 and 5 for VLR purposes?
    4. If the answer to part c is in the affirmative, please identify in Mr. Cureington’s workpapers where and quantify the effect of such displacement.
    5. If the answer to part c is in the negative, please explain the reasons why it is not appropriate for Mr. Cureington’s workpapers to reflect the claim of VLR-related displacement in the referenced testimony.
    6. For the period 2016, and for each of units Ninemile 4 and 5, please identify by date, time, and duration, each instance in which the unit
    7. Please define and quantify the meaning of “more efficient” as used in the referenced testimony (e.g., heat rate). Please quantify the efficiency of each of Ninemile 4 and 5 and each of the NOPS alternatives relative to the referenced testimony’s discussion of efficiency.
15. Please refer to the Supplemental and Amending Direct Testimony of Orlando Todd, the answer to question Q9 at page 4, which says: “The estimated O&M used in the first-year non-fuel revenue requirement does not include Long-Term Service Agreements ("LTSA") costs, as the Company has not yet made a determination regarding the feasibility of entering into an LTSA if the Alternative Peaker unit is selected by the Council.”
    1. Do the O&M costs Mr. Todd estimates reflect the cost to perform required maintenance on the RICE unit, including tasks typically associated with a LTSA?
    2. If the answer to part a is in the negative, what categories of costs, such as LTSA-related costs, are not included in Mr. Todd’s O&M estimate?
    3. If the answer to part a is in the negative, please provide the estimated total O&M cost, including all costs such as LTSA costs.
    4. Does Mr. Todd’s revenue requirement estimate for the RICE unit consider all comparable cost categories as are considered in his CT unit revenue requirement estimate?
    5. If the answer to part d is in the negative, please identify each cost category for the CT unit that is not considered for the RICE unit and provide cost data per year for the RICE unit so that the two estimates consider the same cost categories.
16. Please refer to HSPM exhibit SEC-13.
    1. Please provide all Documents, including calculating and supporting workpapers and data sources in their native electronic format with all cell references and formulas intact related to the values presented therein, including copies of all files referenced in formulas or in notation.
    2. Does the availability of either 100 MW of solar or 200 MW of solar impact the transmission investment required to attain relevant NERC standards compliance?
    3. If the answer to part b is in the negative, please explain the reasons adding solar capacity does not affect required transmission.
    4. If the answer to part a is in the affirmative, please provide updated required transmission investments by year.
    5. Please explain the reason the non-NOPS capacity additions (solar) occur in the same year as each other (2020)?
17. Please refer to HSPM Exhibit OT-1R. Please provide all calculating and supporting workpapers and data in their native electronic format (e.g., Excel) related to the values presented therein.
18. Please refer to RFI CNO 2-2 and ENO’s response thereto.
    1. Please provide the book accounting values of 1) the plant in service, 2) the accumulated reserve, and 3) the net book value of plant that was retired in relation to the deactivation of the Michoud Units.
19. Please provide a copy of ENO’s most current report: Assessment of Entergy’s Transmission System Pursuant to NERC TPL Standards or copies of comparable such reports.
20. Please refer to each of ENO’s responses to RFIs and DRs in the instant docket. For each of the below RFIs or DRs, please update ENO’s response thereto with the most current and responsive data (i.e., provide an addendum response to the RFI or DR) or state that ENO’s existing response is the most current and responsive available.
    1. CNO 1-5
    2. CNO 1-6
    3. CNO 1-7
    4. CNO 1-8, with regard to each NOPS alternative
    5. CNO 1-10
    6. CNO 2-3, with regard to each NOPS alternative
    7. CNO 1-13, with regard to each NOPS alternative
    8. CNO 1-14, with regard to each NOPS alternative
    9. CNO 1-16, with regard to each NOPS alternative
    10. CNO 1-17
    11. CNO 1-22
    12. CNO 1-26
    13. CNO 1-27
    14. CNO 2-8
    15. CNO 1-28
    16. CNO 1-29
    17. CNO 1-30
    18. CNO 1-31
    19. CNO 1-32
    20. CNO 1-33, with regard to each NOPS alternative
    21. CNO 2-20
    22. CNO 3-7
    23. CNO 4-2

Respectfully submitted,

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Walter J. Wilkerson (#13473)

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Seventh Set of Data Requests has been served upon “The Official Service List” via electronic mail and/or U.S. Mail, postage properly affixed, this 14th day of August, 2017.

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Walter J. Wilkerson