

168 FERC ¶ 61,141
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Neil Chatterjee, Chairman;
Cheryl A. LaFleur and Richard Glick.

PJM Interconnection, L.L.C.

Docket No. ER16-372-007

ORDER ON REHEARING

(Issued August 30, 2019)

1. On April 29, 2019, the Commission issued an order¹ conditionally accepting Tariff revisions filed by PJM Interconnection, L.L.C. (PJM) related to its policy requiring generators to have Fuel Cost Policies on file with PJM for use in determining Market Sellers' cost-based offers.² The Commission also denied PJM's motion for clarification as to the appropriateness of the Independent Market Monitor's (IMM or Market Monitor)³ filing of certain complaints against PJM. On May 24, 2019, PJM filed a request for rehearing of the Commission's determination regarding Market Monitor complaint filings. On May 30, 2019, the Market Monitor filed a motion for clarification, or, in the alternative, rehearing.⁴ Also on May 30, 2019, the Electric Power Supply Association (EPSA) filed a request for rehearing. As discussed below, we deny rehearing in part, grant rehearing in part, and direct PJM to make a further compliance filing within 30 days of the date of this order.

¹ *PJM Interconnection, L.L.C.*, 167 FERC ¶ 61,084 (2019) (April 2019 Order).

² The tariffs to which these revisions apply are PJM's Open Access Transmission Tariff (Tariff) and the Amended and Restated Operating Agreement (Operating Agreement).

³ Monitoring Analytics, LLC is the Independent Market Monitor for PJM.

⁴ On June 7, 2019, the Market Monitor submitted a revised version of the rehearing request to correct two typographical errors.

I. Background

2. On February 3, 2017, acting on proposed Tariff revisions submitted by PJM under section 206 of the Federal Power Act (FPA),⁵ the Commission directed PJM to clarify certain penalty provisions for non-compliance with a Market Seller's Fuel Cost Policy and also directed PJM to remove the proposed Tariff revisions that would refer disputes between PJM and the Market Monitor relating to PJM's approval of a generator's Fuel Cost Policy to the Commission's Office of Enforcement.⁶ On March 6, 2017, as amended on July 31, 2017, PJM submitted Tariff revisions in response to the February 2017 Order. Separately, on March 6, 2017, PJM filed a motion requesting clarification regarding the Commission's statement in the February 2017 Order that disputes between PJM and its Market Monitor over Fuel Cost Policies "are the province of the Commission and its Administrative Law Judges to address *in response to a complaint when appropriate*, or for its Administrative Dispute Resolution process to resolve outside of formal processes."⁷ PJM requested clarification that the Commission did not intend to enable the Market Monitor to initiate a complaint against PJM when (a) the Market Monitor disagrees with PJM's acceptance of a seller's Fuel Cost Policy, (b) PJM accepts an offer that the Market Monitor believes is inconsistent with a seller's Fuel Cost Policy, or (c) the Market Monitor disagrees with PJM with respect to whether a penalty should be applied to a Market Seller's cost-based offer.⁸

3. In the April 29 Order, the Commission accepted PJM's compliance filings and directed a further limited compliance filing.⁹ The Commission also denied PJM's clarification request, finding instead that the PJM Tariff, Attachment M permits the

⁵ 16 U.S.C. § 824e (2012).

⁶ *PJM Interconnection, L.L.C.*, 158 FERC ¶ 61,133, at P 51, 86 (2017) (February 2017 Order). The February 2017 Order provides further background on this proceeding. *See id.* PP 2-6.

⁷ PJM March 6, 2017 Request for Clarification at 2 (citing February 2017 Order, 158 FERC ¶ 61,133 at P 86) (emphasis added).

⁸ *Id.* at 2-3.

⁹ PJM submitted its compliance filing on May 28, 2019, which was accepted on August 15, 2019. *PJM Interconnection, L.L.C.*, Docket No. ER16-372-006 (Aug. 15, 2019) (delegated order).

Market Monitor to file a complaint against PJM regarding a Market Seller's Fuel Cost Policy.¹⁰

4. PJM, the Market Monitor, and EPSA filed timely requests for rehearing and/or clarification, each challenging different aspects of the April 2019 Order, as discussed below. The Market Monitor and PJM filed subsequent motions to answer and answers to the rehearing requests.

II. Discussion

A. Procedural Matters

5. Rule 713(d) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.713(d)(1) (2018), prohibits an answer to a request for rehearing. Accordingly, we deny the motions to answer filed by PJM and the Market Monitor and reject those answers.

B. Market Monitor Complaints Regarding Fuel Cost Policy

1. PJM's Request for Rehearing

6. PJM argues that the Commission expanded the plain language of Attachment M in determining that the Market Monitor may file complaints against PJM in the Fuel Cost Policy context.¹¹ PJM asserts that the tariff language relied upon by the Commission in the April 2019 Order may be read to permit the Market Monitor to file a complaint against a Market Participant, but not against PJM.¹² PJM states that any complaint filed by the Market Monitor asserting that an offer represents the exercise of potential market power must necessarily be brought against the Market Seller, not against PJM, because PJM's role does not encompass a determination of whether or not the offer complies with appropriate market power standards.¹³ PJM also points to the transmittal letter accompanying its Attachment M, which specifically referenced the possibility of the

¹⁰ April 2019 Order, 167 FERC ¶ 61,084 at P 72.

¹¹ PJM Rehearing Request at 3.

¹² *Id.*

¹³ *Id.* at 6.

Market Monitor “filing complaints with the Commission against individual *Market Participants*.”¹⁴

7. PJM also contends that the April 2019 Order represents a “significant departure” from the previously established principles set forth in Order No. 719, which provide specifically for referrals when the Market Monitoring Unit perceives market design flaws or instances of misconduct by a Regional Transmission Organization (RTO) or market participant.¹⁵ PJM argues that the Commission’s ruling “effectively renders all of the detailed Tariff language and process regarding referrals superfluous as the April 2019 Order would allow the [Market Monitoring Unit] to file complaints whenever it sees fit.”¹⁶

8. PJM takes issue with the Commission’s statement in the April 2019 Order that: “PJM acknowledges that the Tariff allows the IMM to file complaints against PJM in certain other circumstances” and subsequent statement that “it is unclear why only complaints that fall outside of the Tariff’s explicit grants to the IMM would be problematic with respect to the PJM Board’s ability to fulfill its responsibilities.”¹⁷ PJM maintains that it did not concede that the Tariff authorized the Market Monitor to file complaints against PJM and that the Commission’s statement on this point is not supported by the record. PJM instead contends that the only instance in which a complaint by the Market Monitor is permissible is in the capacity market context – and that the target of that complaint has to be a Capacity Market Seller.¹⁸ PJM argues that the Commission’s alleged mischaracterization of PJM’s position invalidates the conclusion that there is no conflict of interest for the PJM Board.¹⁹

¹⁴ *Id.* (citing *PJM Interconnection, L.L.C.*, Docket No. ER13-149-000, at 14-15 (Oct. 16, 2012) (emphasis added)).

¹⁵ *Id.* (citing *Wholesale Competition in Regions with Organized Electric Markets*, 125 FERC ¶ 61,071 (2008) (Order No. 719)).

¹⁶ *Id.* at 5.

¹⁷ *Id.* at 7 (citing April 2019 Order, 167 FERC ¶ 61,084 at P 75).

¹⁸ *Id.*

¹⁹ *Id.* at 8.

9. PJM argues that Order No. 719 directed Market Monitoring Units to report and be accountable to the RTO board.²⁰ In PJM's view, a finding that the Market Monitor has the ability to file complaints against PJM requires the Commission to revisit Order No. 719 and change the governance structure directed by that order.²¹ Otherwise, PJM argues, the PJM Board is placed "in an untenable position where it must oversee two competing interests in an open Commission proceeding."²²

2. Commission Determination

10. We deny rehearing and affirm the Commission's determination that Attachment M permits the Market Monitor to file a complaint against PJM regarding a Market Seller's Fuel Cost Policy. In the April 2019 Order, the Commission acknowledged that Attachment M specifically grants the Market Monitor the right to file a complaint with the Commission. The Commission interpreted the text of Attachment M in light of other provisions concerning the role of the Market Monitor. Under Attachment M, a major responsibility of the Market Monitor is to monitor the market for the exercise of market power.²³ Attachment M specifically provides that "the Market Monitoring Unit shall review all proposed sell offers for a determination of whether they raise market power concerns" and "determine whether the level of offer or cost inputs raises market power concerns."²⁴ As the Commission found, the review of Fuel Cost Policies directly relates to the Market Monitor's ability to review offers or cost inputs to ensure they are reasonable in the event market power mitigation is required.²⁵ Indeed, Attachment M provides: "[i]n the event that a market participant determines to use an offer or cost input at a level or value that the Market Monitoring Unit has found to involve a potential

²⁰ *Id.* at 11.

²¹ *Id.*

²² *Id.*

²³ PJM Tariff, Attachment M, Article I ("The objectives of this PJM Market Monitoring Plan are to maintain an independent Market Monitoring Unit that will objectively monitor, investigate, evaluate and report on the PJM Markets, including, but not limited to, structural, design or operational flaws in the PJM Markets or the exercise of market power or manipulation in the PJM Markets."); PJM Tariff Attachment M, Article IV, Section E-1 ("Market Power Review: Determinations about market power are the responsibility of the Market Monitoring Unit").

²⁴ PJM Tariff, Attachment M, Article IV, Section E-1.

²⁵ April 2019 Order, 167 FERC ¶ 61,084 at P 73.

exercise of market power, the Market Monitoring Unit may file a petition or initiate other regulatory proceedings addressing the issue.”²⁶ The filing of a complaint on a Market Seller’s Fuel Cost Policy is a method of initiating a regulatory proceeding and therefore falls within the language of this provision.²⁷

11. PJM does not contest that this provision would permit the Market Monitor to initiate a regulatory proceeding, such as filing a complaint, against the Market Participant.²⁸ Instead, PJM argues that such a complaint can be filed only against the Market Participant and not against PJM.

12. We are unpersuaded by PJM’s interpretation of Attachment M as containing a restriction against whom the Market Monitor may initiate regulatory proceedings. Attachment M provides that the Market Monitoring Unit may file a petition or initiate other regulatory proceedings “[i]n the event that a market participant determines to use an offer or cost input at a level or value that the Market Monitoring Unit has found to involve a potential exercise of market power.”²⁹ Nothing in this provision limits the parties against whom a complaint can be filed. Because PJM approves each generator’s Fuel Cost Policy, PJM is a legitimate respondent to a complaint under this provision.³⁰ Similarly, PJM makes the ultimate determination concerning compliance with the Fuel Cost Policy, including related penalty assessments, and is a legitimate respondent to a

²⁶ *Id.* P 74 (citing PJM Tariff, Attachment M, Article IV, Section E-1). The Commission also concluded that the Fuel Cost Policy is closely related to the responsibilities that Attachment M explicitly assigns to the Market Monitor because the Fuel Cost Policy is integral to the determination of whether generators have submitted reasonable cost-based offers in the event market power mitigation is required. April 2019 Order, 167 FERC ¶ 61,084 at P 73.

²⁷ *Id.*

²⁸ PJM does not challenge the Commission’s determination that a complaint is a method of initiating a regulatory proceeding. *See* PJM Request for Rehearing at 5 (“While this provision may be read to allow the Market Monitor to file a complaint when an offer or cost input may amount to an exercise of market power, it can only be read . . . to permit such filing of a complaint against a Market Participant, not against PJM.”).

²⁹ PJM Tariff, Attachment M, Article IV, Section E-1.

³⁰ PJM fails to explain the relevant difference between filing a complaint against a generator’s submission of a Fuel Cost Policy and PJM’s acceptance of that policy. If the Commission granted a complaint against the generator, the generator would have to resubmit the Fuel Cost Policy and PJM would have to abide by that revised policy.

complaint in this circumstance as well. Accordingly, we affirm that the Commission reasonably interpreted Attachment M to permit the Market Monitor to file a complaint regarding PJM's acceptance of a Fuel Cost Policy with which the Market Monitor disagrees or a Market Seller's possible non-compliance with its Fuel Cost Policy, and related penalty assessments by PJM.

13. The language in the transmittal letter accompanying Attachment M, as cited by PJM, does not change our interpretation of Attachment M and is not dispositive.³¹ The Commission's order accepting Attachment M did not refer to any limitation on the Market Monitor's right to file complaints only against Market Participants, and the Tariff itself contains no such limitation.

14. PJM claims that, contrary to the Commission's statement in the April 2019 Order,³² PJM did not acknowledge that the Tariff permits complaints by the Market Monitor specifically against PJM in certain circumstances and that, absent this acknowledgement, the Commission has not adequately explained why allowing the Market Monitor to file complaints against PJM does not present a conflict of interest for the PJM Board. We remain unconvinced that the PJM Board's oversight of the Market Monitor's budget presents a conflict of interest that could serve as a bar to the Market Monitor's filing a complaint. PJM's clarification of its position on whether the Market Monitor may file complaints against PJM in other circumstances does not demonstrate that the PJM Board would be unable to fulfill its responsibilities in the event of such a complaint. Further, PJM has failed to explain why the PJM Board can fulfill its responsibilities in circumstances in which the Market Monitor makes filings with the Commission, such as protests to PJM filings, but cannot do so with respect to complaints regarding Fuel Cost Policies.³³ In any event, PJM's assertion of the potential for a hypothetical complaint to create a conflict of interest for the PJM Board does not alter our interpretation of the Tariff, which is based on the text of the Tariff read in conjunction with other provisions addressing the role of the Market Monitor.

15. Finally, we disagree with PJM's contention that the April 2019 Order represents a "significant departure" from the established principles set forth in Order No. 719. As the

³¹ See, e.g., *ISO New England Inc.*, 144 FERC ¶ 61,169, at P 21 (2013) ("We note that the language contained in the actual tariff, not the applicant's transmittal letter, is the filed rate.").

³² See April 2019 Order, 167 FERC ¶ 61,084 at P 75 ("At the same time, PJM acknowledges that the Tariff allows the IMM to file complaints against PJM in certain circumstances.").

³³ *Id.*

Commission found in the April 2019 Order, this issue is properly resolved based on Attachment M, which the Commission has accepted as just and reasonable and which is not inconsistent with Order No. 719. Here, PJM's Tariff details the Market Monitor's responsibilities and does not limit the parties against which the Market Monitor can file a complaint.³⁴

C. Tariff Provision Governing Disputes about Compliance with Fuel Cost Policies

1. The Market Monitor's Request for Rehearing

16. The Market Monitor asserts that the provision in Operating Agreement Schedule 2, section 6.1(d)³⁵ should be revised on rehearing to remove language referencing referrals to the Commission's Office of Enforcement. The provision states: "If upon review of a Market Seller's cost-based offer PJM and the Market Monitoring Unit disagree about whether the offer is in compliance with the Market Seller's PJM-approved Fuel Cost Policy or disagree over whether any portion of the cost-based offer is not in compliance with this Schedule 2, PJM and/or the Market Monitoring Unit may confidentially refer the matter to FERC Office of Enforcement."³⁶ The Market Monitor asks that the Commission direct PJM instead to specify that the Market Monitor may "file a complaint or take other appropriate regulatory action" in the event of a dispute about whether an offer is in compliance with the Market Seller's Fuel Cost Policy.³⁷ According to the Market Monitor, this revision is consistent with the Commission's finding in the

³⁴ See *Interstate Natural Gas Ass'n of Am. v. FERC*, 285 F.3d 18, 50 (D.C. Cir. 2002) (remanding for clarification of relationship between rule-making provisions and tariff provisions); *Regulation of Short-Term Nat. Gas Transportation Servs.*, 101 FERC ¶ 61,127, at P 35 (2002) (determining on remand that tariff provisions generally govern over regulations).

³⁵ The Market Monitor's request for rehearing, as well as the April 2019 Order, references this provision as 5.1(d). However, this provision was recently renumbered in a different compliance filing. See *PJM Interconnection, L.L.C.*, Compliance Filing Concerning Variable Operating and Maintenance Costs, Docket No. EL19-8-002 (May 24, 2019). Therefore, we will refer in this order to Operating Agreement Schedule 2, section 6.1. OA Schedule 2, (7.1.2), section 6.1(d), <https://etariff.ferc.gov/TariffSectionDetails.aspx?tid=1731&sid=255974> (containing the revised language)

³⁶ Market Monitor's Rehearing Request at 5.

³⁷ *Id.*

February 2017 Order that such disputes are “not the role of the Office of Enforcement” but are instead “the province of the Commission and its Administrative Law Judges to address in response to a complaint when appropriate, or for its Administrative Dispute Resolution process to resolve outside of formal processes.”³⁸

2. Commission Determination

17. After further consideration, we find that the references to the Office of Enforcement should be removed from section 6.1(d) of Schedule 2 of the Operating Agreement. This is consistent with the Commission’s determination allowing the Market Monitor to file complaints against PJM concerning (1) disputes regarding approval of a Fuel Cost Policy and (2) disputes on whether a cost-based offer is in compliance with a seller’s Fuel Cost Policy. In the February 2017 Order, the Commission concluded that the Office of Enforcement should not resolve disputes between an RTO and its market monitor concerning the approval of a Market Seller’s Fuel Cost Policy. To a similar degree, the Office of Enforcement should not resolve disputes between an RTO and its market monitor concerning compliance with a Market Seller’s Fuel Cost Policy. Such disputes are the province of the Commission and its Administrative Law Judges to address in response to a complaint when appropriate. Therefore, we grant rehearing and direct PJM to submit a compliance filing, within 30 days of the date of this order, removing section 6.1(d) of Schedule 2 of the Operating Agreement in its entirety.

D. Penalty Structure

1. EPSA’s Request for Rehearing

18. EPSA seeks rehearing of the Commission’s decision to allow PJM to assess penalties for a minimum of one day for failure to comply with its Fuel Cost Policy. EPSA contends that the one-day minimum penalty results in a retroactive penalty in circumstances where PJM has not notified the Market Seller of its non-compliance or where the Market Seller has not had an opportunity to correct its offers.³⁹ EPSA argues that this retroactive penalty cannot be reconciled with the Commission’s conclusion from the April 2019 Order that it is “appropriate that the penalty be applied after a Market Seller has received notification of an infraction, since the purpose of the penalty structure is . . . not to retroactively penalize a Market Seller.”⁴⁰

³⁸ *Id.* (citing February 2017 Order, 158 FERC ¶ 61,133 at P 86).

³⁹ EPSA Rehearing Request at 7.

⁴⁰ *Id.* (citing April 2019 Order, 167 FERC ¶ 61,084 at P 32).

2. Commission Determination

19. We deny EPSA's request for rehearing. The Commission first found in the February 2017 Order that PJM's proposed penalty structure was appropriate because it was "designed to grow in proportion with the possible impact that a Market Seller's cost-based offer may have on the market."⁴¹ PJM clarified in an amendment, submitted to the Commission on July 31, 2017, that the penalty will be applicable on a prospective basis after a Market Seller is notified, but in any event will always be applicable for a minimum of one day.⁴² As the Commission noted in the April 2019 Order, "[n]othing in the July 31 Amendment changed PJM's original proposal, approved by the Commission, to have non-compliance penalties begin on the day of notification."⁴³ Although EPSA styles its pleading as a request for rehearing of the April 2019 Order, its challenge to the Commission's acceptance of the penalty structure is, in essence, a late-filed request for rehearing of the February 2017 Order and is thus statutorily barred.⁴⁴

E. Tariff Provision Concerning Market Monitor Input Regarding Fuel Cost Policies

1. Market Monitor's Request for Rehearing and/or Clarification

20. The Market Monitor asserts that Order No. 719 requires that all provisions relating to the Market Monitoring Unit's duties be centralized in one section of an RTO's tariff.⁴⁵ Therefore, the Market Monitor argues, the provisions concerning the Market Monitor's duty to provide timely input to PJM and the Market Seller regarding compliance with

⁴¹ February 2017 Order, 158 FERC ¶ 61,133 at P 78.

⁴² July 31 Amendment at 5. We also note that EPSA did not file comments or protests on the July 31 Amendment, and the Commission looks with disfavor on parties raising issues for the first time on rehearing. *See, e.g., PJM Interconnection, L.L.C.*, 126 FERC ¶ 61,030, at P 15 and n.10 (2009) ("The Commission has held that raising issues for the first time on rehearing is disruptive to the administrative process and denies parties the opportunity to respond."); *Allegheny Energy Supply Co., L.L.C.*, 122 FERC ¶ 61,104, at P 6 (2008) (same); 18 C.F.R. § 385.713(d) (2018) ("The Commission will not permit answers to requests for rehearing.").

⁴³ April 2019 Order, 167 FERC ¶ 61,084 at P 31 (citing February 2017 Order, 158 FERC ¶ 61,133 at P 71).

⁴⁴ 16 U.S.C. § 825l(a) (2012); *see also* 18 C.F.R. § 385.713(b) (2018).

⁴⁵ Market Monitor Rehearing Request 3.

Fuel Cost Policies belong in the Tariff at Attachment M.⁴⁶ The Market Monitor states that it is not sufficient for these provisions to be included in Manual 15, as accepted by the Commission in the April 2019 Order, because the manuals are not part of the market monitoring rules consolidated at Attachment M and Attachment M-Appendix.⁴⁷ Further, the Market Monitor notes that the manuals are not part of the PJM Tariff and may be unilaterally modified by PJM.⁴⁸

2. Commission Determination

21. We do not find it necessary to require further revisions to Attachment M because there is already an express provision in the Tariff discussing the Market Monitor's duty to provide input regarding compliance with Fuel Cost Policies. As the Commission noted in the April 2019 Order, Attachment M-Appendix provides that:

The Market Monitoring Unit shall review the incremental costs (defined in Operating Agreement, Schedule 1, section 6.4.2 and the parallel provisions of Tariff, Attachment K-Appendix, section 6.4.2) included in the Offer Price Cap of a generating unit in order to ensure that the Market Seller has correctly applied the Cost Development Guidelines, including its PJM-approved Fuel Cost Policy, and that the level of the Offer Price Cap is otherwise acceptable. *The Market Monitoring Unit shall inform PJM if it believes a Market Seller has submitted a cost-based offer that is not compliant with these criteria and whether it recommends that PJM assess the applicable penalty therefor, pursuant to Operating Agreement, Schedule 2.*⁴⁹

F. Notice of Infraction Triggering Commencement of Penalties

1. The Market Monitor's Request for Rehearing

22. The Market Monitor states that the Tariff language accepted in the April 2019 Order does not align with the Commission's recognition that penalties should commence

⁴⁶ *Id.*

⁴⁷ *Id.* at 3-4.

⁴⁸ *Id.* at 4.

⁴⁹ April 2019 Order, 167 FERC ¶ 61,084 at P 43 (quoting section II.A of Attachment M-Appendix of the Tariff (emphasis added)).

upon notice from either PJM *or* the Market Monitor.⁵⁰ Specifically, the Market Monitor points to Operating Agreement, Schedule 2, section 6.1(a),⁵¹ which provides that penalties are based on “the number of days since PJM first notified the Market Seller of PJM’s and the Market Monitoring Unit’s agreement regarding applicability of the penalty.”⁵² The Market Monitor requests clarification that PJM will assess a penalty starting from the date and time of notification from PJM or the Market Monitor or other source, including the Commission.⁵³

2. Commission Determination

23. Although the Commission accepted PJM’s proposal that it would “begin applying the penalty the day after the Market Seller was placed on notice of the infraction by PJM or the Market Monitor,”⁵⁴ the Tariff that the Commission accepted in the April 2019 Order did not recognize the Market Monitor as an entity that could notify a Market Seller of an infraction.⁵⁵ We clarify here that, consistent with that Tariff language, PJM (and not the Market Monitor) is the appropriate entity to notify the Market Seller in the event of the infraction. We therefore deny the Market Monitor’s request to require a revision to section 6.1(a) of Schedule 2.

The Commission orders:

(A) The requests for rehearing and/or clarification of the April 2019 Order are hereby granted in part, and denied in part, as discussed in the body of this order.

⁵⁰ Market Monitor Request for Rehearing at 2.

⁵¹ *See supra* note 35.

⁵² Market Monitor Request for Rehearing at 2-3.

⁵³ *Id.* 3.

⁵⁴ April 2019 Order, 167 FERC ¶ 61,084 at P 32.

⁵⁵ Section 6.1(a) of Schedule 2 of the Operating Agreement provides that penalties are based on “the number of days since PJM first notified the Market Seller of PJM’s and the Market Monitoring Unit’s agreement regarding applicability of the penalty.”

(B) PJM is hereby directed to submit a further compliance filing, within 30 days of the date of this order, as discussed in the body of this order.

By the Commission. Commissioner McNamee is not participating.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.