20171031102039 Filed Date: 10/31/2017 State Corporation Commission of Kansas

Exhibit No.:

Issue: Customer Savings and Necessary

Regulatory Approvals
Witness: Christopher D. Krygier
Type of Exhibit: Direct Testimony
Sponsoring Party: The Empire District

Electric Company

Case No:

APSC Docket No. 17-061-U

KCC Docket No. 18-EPDE-___--PRE

MPSC File No. EO-2018-0092

OCC No. PUD 2017 __

Date Testimony Prepared: October 2017

Direct Testimony

of

Christopher D. Krygier



TABLE OF CONTENTS

I	INTRODUCTION
II.	RELIEF REQUESTED TO IMPLEMENT THE CUSTOMER SAVINGS PLAN5
a.	Wind Projects Related Relief
b.	Other Regulatory Relief
III.	CUSTOMER RATE IMPACTS
IV.	STATE SPECIFIC FILING REQUIREMENTS
a.	Minimum Filing Requirements Under K.S.A. 66-1239
b.	Empire's Request Under K.S.A. 66-1245
c.	Empire's Request Under The Clean Energy Development Act
d.	Empire's Request Under Missouri Chapter 22, Chapter 12 – Change in Preferred Plan 14

I. <u>INTRODUCTION</u>

1

- 2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 3 A. My name is Christopher D. Krygier and my business address is 602 South Joplin
- 4 Avenue, Joplin, Missouri, 64801.

5 Q. WHO IS YOUR EMPLOYER AND WHAT POSITION DO YOU HOLD?

- 6 A. My employer is Liberty Utilities Service Corp. and I serve as the Director of Rates
- and Regulatory Affairs for Liberty Utilities Central Region, which includes The
- 8 Empire District Electric Company ("Empire" or "Company").

9 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND.

- 10 A. In 2006, I completed my Bachelor of Science in Economics from the W.P. Carey
- School of Business at Arizona State University. In 2010, I completed my Master of
- Business Administration with an emphasis in Finance from Arizona State University.
- Finally, I am a Certified Management Accountant as designated by the Institute of
- Management Accountants.

15 O. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.

- 16 A. I currently oversee the rates and regulatory affairs for Liberty Utilities Central Region
- which includes electric, natural gas, water and wastewater utilities located in
- Missouri, Kansas, Arkansas, Oklahoma, Iowa and Illinois. Prior to that, I worked for
- 19 Liberty Utilities affiliates located in Jackson, Missouri and Avondale, Arizona and
- was responsible for rates and regulatory affairs. Before working for Liberty Utilities,
- I worked for several subsidiaries of American Water Works, Inc. for approximately
- six years in a variety of capacities, including Financial Planning and Analysis, Rates,
- 23 Regulatory Compliance and Capital Programs.

1 O. HAVE YOU TESTIFIED BEFORE ANY STATE REGULATORY

- 2 **COMMISSIONS?**
- 3 A. Yes, I have provided testimony before the public utility commissions in Arizona,
- 4 Arkansas, Hawaii, Illinois, Kansas, Missouri and Oklahoma.
- 5 Q. PLEASE PROVIDE A SUMMARY OF YOUR TESTIMONY.
- 6 A. My testimony describes the requested relief associated with the Company's Customer
- 7 Savings Plan, the impact of the Customer Savings Plan on customer rates, and state
- 8 specific filing requirements. It is important to note that Empire is not proposing any
- 9 changes to customer rates as part of this filing, but rather is proposing a plan that will
- result in lower cost power in the future for its customers. Based on the Generation
- 11 Fleet Savings Analysis outlined in Company witness McMahon's testimony, it is
- estimated that customers will experience up to \$325 million of savings on their
- overall bill over twenty years. As calculated by Company witness Macias in **Direct**
- 14 Attachment GEM-2, based on the estimated \$325 million in savings, the monthly
- average lower cost of power for a residential customer using 1,000 kwh for the
- twenty year period is significant, Table 1 reflects the savings by state, but on average,
- Empire residential customers are saving \$9.62 per month for the twenty year period.

	Table 1
State	Average Residential Savings Per Month
Missouri	\$9.33
Arkansas	\$11.62
Kansas	\$10.02
Oklahoma	\$7.49
4 State Average	\$9.62

1

2 O. PLEASE DESCRIBE EMPIRE AND THE AREA IT SERVES.

A. Empire was acquired by Liberty Utilities (Central) Co., an indirect subsidiary of
Algonquin Power & Utilities Corp., on January 1, 2017. Empire owns and operates
an electric utility system located in contiguous portions of Arkansas, Kansas,
Missouri and Oklahoma, which serves approximately 172,000 electric customers.
Approximately 153,000 of Empire's customers are located in Missouri, 10,000 in
Kansas, 4,700 in Oklahoma and 4,500 in Arkansas.

9 II. RELIEF REQUESTED TO IMPLEMENT THE CUSTOMER SAVINGS PLAN

10 Q. PLEASE DESCRIBE THE COMPANY'S CUSTOMER SAVINGS PLAN.

11 A. Through its Customer Savings Plan, Empire is proposing changes to its generation
12 fleet in order to take advantage of expiring federal production tax credits ("PTCs") to
13 bring up to \$325 million in savings for its customers over the next twenty years.
14 Specifically, Empire proposes acquiring up to 800 MW of wind generation
15 strategically located in or near its service territory (the "Wind Projects") in
16 conjunction with a tax equity partner (or partners, as the case may be). By partnering

with tax equity, Empire can acquire this generation for approximately 40 cents on the dollar. At the same time, Empire proposes to retire its Asbury coal plant, saving customers millions of dollars in annual operating expenses and avoiding tens of millions of dollars of capital investments needed by April 2019 to meet environmental regulations. Empire is requesting an order from each of its state commissions effective no later than June 30, 2018 so that it can take advantage of this limited window of opportunity to make these savings a reality for its customers.

8 Q. IS EMPIRE REQUESTING THAT ANY OF ITS COMMISSIONS¹ GRANT 9 ANY RATE INCREASES IN THIS FILING?

A. No. Rate changes to reflect the savings and costs of the Customer Savings Plan will occur either in the next general rate case in each jurisdiction or in a subsequent filing as applicable in each jurisdiction in which Empire operates. While Empire will seek recovery for the costs it will incur to acquire, operate and maintain the wind projects that are part of the Customer Savings Plan in a subsequent proceeding(s), Empire seeks approval now of certain regulatory treatment of costs associated with the Customer Savings Plan given the magnitude of the contemplated investments.

17 Q. WHAT RELIEF DOES EMPIRE SEEK FROM THE COMMISSION TO 18 IMPLEMENT THE CUSTOMER SAVINGS PLAN?

- 19 A. Empire seeks the following approvals in order to implement the Customer Savings20 Plan:
- 21 1. Authorization to record its investment in and the costs to operate and maintain

1

2

3

4

5

6

7

10

11

12

13

14

15

¹ The Company refers to each of the four state public utility commissions as "commissions," not in specific reference to one commission.

1 2 3 4 5		any Wind Projects acquired as part of the Customer Savings Plan as described in Mr. Mooney's testimony, including a finding that Empire's investment related to the Customer Savings Plan should not be excluded from Empire's rate base on the ground that the decision to proceed with the Plan was not prudent;
6 7 8 9 10		2. Authorization to create a regulatory asset for the undepreciated balance of the Asbury facility, as described in Company witness Sager's testimony, so that it may be considered for rate base treatment in subsequent rate cases;
11 12 13		3. Approval of the arrangements between Empire and affiliates necessary to implement the Customer Savings Plan, to the extent necessary;
14 15 16		4. Approval of depreciation rates for the Wind Projects, as described in Company witness Watson's testimony, so that Empire can begin depreciating those assets as soon as they are placed in service; and
17 18 19 20 21		5. Issuance of an order that is effective by June 30, 2018 so that Empire can take advantage of a limited window of opportunity to bring these savings to customers.
22		I describe each portion of the requested relief below.
23		a. Wind Projects Related Relief
24	Q.	WHAT RELIEF IS EMPIRE SEEKING AS IT RELATES TO THOSE COSTS
25		AND INVESTMENTS EMPIRE INCURS TO ACQUIRE AND OPERATE
26		THE WIND PROJECTS?
27	A.	Empire requests that the Commission authorize it to treat its capital investment to
28		acquire the Wind Projects as rate base investment, and to allow it to recover the
29		operating expenses associated with the Wind Projects in the same manner it recovers
30		the operating expense of its generation assets today. Company witness Mooney's
31		testimony describes that capital investment in detail, as well as the related operating
32		expenses.
33	Q.	WHY IS THIS PROPOSED RATEMAKING TREATMENT REASONABLE?

1	A.	The Wind Projects will be jointly owned by Empire and the tax equity partner(s)
2		which is similar to Empire's joint ownership of its Iatan and Plum Point generation.
3		In those cases, Empire's costs to acquire the generating units have been included in
4		Empire's rate base, and their operating costs have been flowed through to customers.
5		Empire's customers will be receiving the savings arising out of acquisition of the
6		Wind Projects, and thus it is appropriate that they should pay the costs associated
7		with them.
8		b. Other Regulatory Relief
9	Q.	WHAT RELIEF IS EMPIRE SEEKING RELATED TO ASBURY?
10	A.	Empire is requesting authority to record as a regulatory asset the remaining plant
11		balances associated with the Asbury coal plant once retired. Company witness
12		Sager's testimony discusses the accounting mechanics of this request.
13	Q.	HOW DOES THE CONTINUED RECOVERY OF EMPIRE'S ASBURY
14		INVESTMENT BENEFIT EMPIRE'S CUSTOMERS?
15	A.	The \$172 - \$325 million in savings proposed by the Customer Savings Plan, and
16		discussed in Company witness McMahon's testimony is premised on the retirement
17		of Asbury and the establishment of a regulatory asset allowing for the return on and
18		of the remaining net plant balances. As Company witness Swain explains, without
19		adopting the Customer Savings Plan in its entirety, Empire would not be able to bring
20		these savings to its customers.
21	Q.	PLEASE DISCUSS THE REQUESTED RELIEF RELATED TO AFFILIATE

TRANSACTIONS.

- 1 A. As Company witnesses Mertens and Mooney explain, there will be a number of
- 2 contracts between Empire or Liberty Utilities Service Corp. and the Wind Project Co.
- Because the Wind Project Co. will be a subsidiary of Empire's, it will be an affiliated
- 4 company, and thus affiliate requirements may be triggered. Empire requests that the
- 5 Commission authorize these affiliate transactions to the extent required in order to
- 6 implement the Customer Savings Plan.

7 Q. PLEASE DISCUSS THE COMPANY'S REQUESTED RELIEF RELATED TO

DEPRECIATION RATES.

8

- 9 A. Company witness Mooney explains that the Wind Projects will be placed in-service
- no later than December 31, 2020 to meet Internal Revenue Service guidelines for
- 11 PTC eligibility. Because Empire does not have wind depreciation rates in place, it
- will need to have a depreciation rate in place for these assets effective as of the date
- that they are placed in-service. This rate would remain in effect until Empire's next
- rate case is completed and a full depreciation study can be completed for the Wind
- Projects. Company witness Watson's testimony recommends a depreciation rate for
- use until a full depreciation study is completed.

17 Q. IS EMPIRE REQUESTING AN ORDER BY A PARTICULAR DATE?

- 18 A. Yes. Empire requests that the Commission issue an order effective no later than June
- 19 30, 2018 so that the Company can take the steps necessary to implement the
- 20 Customer Savings Plan. As outlined by Company witnesses Swain and Mooney,
- 21 Empire has a very limited period of time to acquire wind generation assets that
- 22 qualify for the PTCs and to avoid spending millions of dollars on further
- environmental upgrades for Asbury. Without acting within the time frame requested,

1	Empire cannot bring up to \$325 million in savings to its customers. Thus, without
2	such action, this opportunity will be lost for the Company's customers.

3 III. <u>CUSTOMER RATE IMPACTS</u>

- 4 Q. PLEASE SUMMARIZE THE CUSTOMER RATE IMPACTS OF THE 5 CUSTOMER SAVINGS PLAN.
- A. The Customer Savings Plan is expected to result in a lower cost of power for the average residential customer monthly bill by \$7 to \$12 depending on whether you are a resident of Missouri, Arkansas, Kansas or Oklahoma. This monthly savings is estimated by looking at the revenue requirement impacts of both the wind generation asset and the retirement of Asbury, which is reflected on **Direct Attachment CDK-1**.
- 11 Q. PLEASE DISCUSS EACH COST CATEGORY LISTED ON DIRECT
 12 ATTACHMENT CDK-1.
- Asbury O&M savings, 3) Asbury regulatory asset return on and of, 4) wind generation asset revenue requirement, and 5) Wind Project energy savings.

The first component, Asbury fuel savings, refers to the cost savings resulting from avoided purchases of coal once Asbury is retired. The second component, Asbury O&M savings, similar to coal costs, reflects the reductions in O&M due to Asbury no longer operating. In this case, repairs, maintenance, labor and other charges will no longer be experienced after the plant closes. The third component, Asbury regulatory asset return on and of, calculates the annual amount of regulatory asset amortization and rate base return generated by the Asbury plant. This annual amortization was calculated by taking the remaining net plant balance and amortizing

16

17

18

19

20

21

22

it over 30 years. The rate base return multiplies the net plant balance by the weighted average cost of capital to net the annual return component grossed-up for income taxes. The fourth component, the Wind Projects revenue requirement, calculates the return on and of the Wind Projects. This component reflects the tax equity investment described in Mr. Mooney's testimony, a thirty year depreciation rate as recommended by Mr. Watson, and the weighted average cost of capital grossed-up for taxes as described by Company witness McMahon. The fifth component, Wind Projects energy savings, reflects the amount of energy output expected from the Wind Projects plus the incremental revenue that will be received from the Southwest Power Pool. These five components are summed and netted against each other resulting in an estimated revenue requirement reduction for the twenty year period contemplated by the Customer Savings Plan.

13 Q. DID EMPIRE PERFORM A NEW RATE DESIGN STUDY TO ALLOCATE

THESE SAVINGS FOR THIS PROJECT?

1

2

3

4

5

6

7

8

9

10

11

12

14

23

15 A. No, Empire relied on the rate designs previously used in its rate cases in each
16 jurisdiction. Company witness Macias provides a detailed breakdown of the revenue
17 requirement components discussed above and allocated by customer class based upon
18 rate designs frameworks utilized in the prior rate case for each Empire jurisdiction.

19 O. WHAT IS THE RESULT OF THIS RATE ALLOCATION?

A. As reflected in Table 1 earlier and reflected in **Direct Attachment GEM-2**, the average monthly savings over the twenty years \$9.62 for Empire residential customers.

Q. ARE THERE ANY OTHER POTENTIAL IMPACTS TO CONSIDER?

1	A.	Yes, one potential impact to consider is how the savings are captured on a yearly
2		basis over the twenty or thirty year period contemplated by the Customer Savings
3		Plan. Once the final Wind Projects are selected through the Request for Proposal
4		process, the Company will re-calculate the savings on a year-by-year basis and
5		determine if any levelization of the savings is necessary to ensure no net detriment to
6		customers.
7	IV.	STATE SPECIFIC FILING REQUIREMENTS
8		a. Minimum Filing Requirements Under K.S.A. 66-1239
9	Q.	DOES EMPIRE'S FILING MEET THE MINIMUM FILING
10		REQUIREMENTS UNDER K.S.A. 66-1239?
11	A.	As I understand it, in order for an electric utility to seek a pre-determination of the
12		ratemaking principles and treatment that will apply to the recovery in rates of the
13		costs incurred in acquiring new electric generation facilities, the utility is required to
14		provide information regarding the following:
15 16 17 18		 The description of proposed generation facilities and selection process. The utility's conservation measures and demand side management ("DSM") efforts. The utility's ten-year generation and load forecast.
19 20		(4) The power supply alternatives considered by Empire.
21		The description of the proposed generation facilities and request for proposal ("RFP")
22		process are described in Company witness Wilson's testimony. Empire's
23		conservation measures and DSM efforts, its 10-year generation and load forecast, and
24		the power supply alternatives considered by Empire are included as part of the
25		Generation Fleet Savings Analysis and discussed in Company witness McMahon's

testimony.

2	Q.	IS THE COMPANY REQUESTING A DETERMINATION UNDER K.S.A. 66-
3		1245?
4	A.	Yes. To the extent the Company acquires a project in Kansas that meets the
5		following criteria, the Company seeks a determination from the Kansas Corporation
6		Commission ("KCC") that it will be entitled to the adjustment in its rates as allowed
7		under K.S.A. 66-1245. That statute states:
8 9 10 11 12 13 14 15 16 17		(a) If an electric public utility constructs new or expanded electric generation capacity on or after January 1, 2004, in a county where the population has not increased more than 5% between the dates of the two most recent decennial censuses taken and published by the United States bureau of the census, the state corporation commission, in determining the utility's revenue requirements, shall make adjustments that allow the utility to retain benefits equivalent to 10% of the net revenues from sales of electricity generated by such new or expanded capacity to customers outside the state. (b) The provisions of this section shall not apply to net revenues which are subject to the provisions of K.S.A. 66-1,184a, and amendments thereto.
19	Q.	WHAT DOES THE STATUTE CONTEMPLATE?
20	A.	While I am not attorney, I read the statute to create certain incentives if an electric
21		utility builds electric generation in certain parts of the state.
22	Q.	WHAT ARE THE CRITERIA TO QUALIFY FOR THE INCENTIVES
23		UNDER THE STATUTE?
24	A.	Again, while I am not an attorney, I see several: (1) the entity must be an electric
25		public utility; (2) the generation constructed must be new or expanded; (3) the facility
26		must be located in a Kansas county where the population has not increased more than
27		5%, and; (4) the generation facility must serve customers inside and outside the state
28		of Kansas.

b. Empire's Request Under K.S.A. 66-1245

1	Q.	DOES THE CUSTOMER SAVINGS PLAN MEET ALL OF THIS CRITERIA?
2	A.	Assuming that through the RFP process Empire acquires a Wind Project that is
3		located within a qualifying Kansas county, I believe that these criteria will be met.
4		Assuming that occurs, Empire will provide the KCC with specific information
5		regarding the Wind Project and the application of the statute.
6		c. Empire's Request Under The Clean Energy Development Act
7	Q.	WILL THE COMPANY MAKE ANY SUBSEQUENT FILINGS UNDER THE
8		CLEAN ENERGY DEVELOPMENT ACT?
9	A.	Yes. Assuming the Arkansas Public Service Commission approves of the Company's
10		Customer Savings Plan, the Company would make a subsequent filing that includes a
11		request for rider that includes the costs of the Wind Projects and a calculation of how
12		they would be recovered in rates for Arkansas jurisdictional customers. The
13		Company would work with Staff of the Arkansas Public Service Commission along
14		with the Arkansas Attorney General and any other stakeholders to the docket to
15		effectuate such a rider. An example of such a rider is included as Direct Attachment
16		<u>CDK-2</u> to my testimony.
17		d. Empire's Request Under Missouri Chapter 22, Chapter 12 – Change in
18		Preferred Plan
19	Q.	EMPIRE FILED ITS MOST RECENT INTEGRATED RESOURCE PLAN IN
20		MISSOURI ON APRIL 1, 2016, IN FILE NO. EO-2016-0223. HOW DID THAT
21		MATTER CONCLUDE?
22	A.	On April 6, 2017, effective May 6, 2017, the Commission issued its Order Regarding
23		2016 Integrated Resource Plan, wherein, among other things, the Commission found

1		that Empire's 2016 Triennial Compliance Filing was "in substantial compliance with
2		the requirements of Chapter 22 and the utility's resource acquisition strategy does
3		meet the requirements stated in 4 CSR 240-22."
4	Q.	WAS THE CUSTOMER SAVINGS PLAN DESCRIBED IN THIS FILING
5		IDENTIFIED AS THE PREFERRED RESOURCE PLAN IN THE 2016
6		TRIENNIAL COMPLIANCE FILING THE PREFERRED PLAN?
7	A.	It was not. As explained by Company witness Mertens, Empire undertook a review
8		of its generation fleet to determine whether it could create any additional savings to
9		customers over its 2016 Integrated Resource Plan. The Customer Savings Plan is a
10		product of this work.
11	Q.	COMMISSION RULE 4 C.S.R. 240-22.080(12) REQUIRES CERTAIN
12		NOTIFICATION WHEN A "UTILITY'S BUSINESS PLAN OR
13		ACQUISITION STRATEGY BECOMES MATERIALLY INCONSISTENT
14		WITH THE PREFERRED RESOURCE PLAN OR IF THE UTILITY
15		DETERMINES THAT THE PREFERRED RESOURCE PLAN OR
16		ACQUISITION STRATEGY IS NO LONGER APPROPRIATE " HAS
17		EMPIRE PROVIDED ANY SUCH NOTICE?
18	A.	No.
19	Q.	WHY NOT?

A. The Customer Savings Plan represents an alternative approach to the preferred plan that provides additional savings to customers, and thus presents a better option for customers, assuming that Empire obtains the relief requested in time to take advantage of expiring PTCs, and to avoid incurring the expense of further

- environmental upgrades at Asbury. Without this relief, Empire's preferred plan will
- 2 remain unchanged from that contained its 2016 Triennial Compliance Filing.
- 3 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
- 4 A. Yes.

The Empire District Electric Company Twenty Year Revenue Requirement Savings (\$000)

Line											
No.											
1		2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
2	Wind Revenue Requirement	0.00	2.40	132.62	130.15	126.60	124.96	124.72	108.60	119.91	116.69
3	Wind Benefits	0.00	(23.22)	(106.05)	(115.56)	(123.27)	(129.34)	(134.87)	(141.57)	(147.14)	(155.58)
4	NET WIND	0.00	(20.82)	26.57	14.58	3.33	(4.38)	(10.16)	(32.97)	(27.23)	(38.90)
5											
6	Asbury Revenue Requirement	(9.37)	(20.43)	(26.22)	(26.12)	(25.40)	(24.96)	(24.60)	(24.24)	(23.44)	(22.75)
7	Asbury Benefits	0.00	6.64	12.78	15.37	17.25	18.94	17.89	21.28	21.05	22.30
8	NET ASBURY	(9.37)	(13.79)	(13.44)	(10.75)	(8.15)	(6.03)	(6.72)	(2.97)	(2.39)	(0.45)
9											
10	Other	(0.18)	(0.72)	2.07	2.67	2.25	2.47	2.69	14.48	17.88	15.18
11	TOTAL (Savings) / Increase	(9.55)	(35.34)	15.20	6.50	(2.57)	(7.93)	(14.18)	(21.46)	(11.74)	(24.17)
12											
13											
14		2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
15	Wind Revenue Requirement	112.55	120.70	91.24	62.14	31.39	(3.50)	0.34	79.82	39.03	39.89
16	Wind Benefits	(161.65)	(146.18)	(152.65)	(124.73)	(128.83)	(135.24)	(142.45)	(149.30)	(155.82)	(160.53)
17	NET WIND	(49.10)	(25.47)	(61.42)	(62.59)	(97.44)	(138.74)	(142.11)	(69.47)	(116.79)	(120.64)
18	_										
19	Asbury Revenue Requirement	(22.11)	(14.41)	(23.07)	(19.68)	(26.77)	(19.00)	(16.34)	(23.83)	4.25	4.33
20	Asbury Benefits	24.31	23.59	25.22	26.70	26.48	29.24	30.83	0.00	0.00	0.00
21	NET ASBURY	2.20	9.17	2.15	7.01	(0.29)	10.24	14.49	(23.83)	4.25	4.33
22											
23	Other	15.24	(5.66)	(2.54)	12.80	8.04	52.76	44.05	19.41	(7.08)	(7.60)
24	TOTAL (Savings) / Increase	(31.66)	(21.96)	(61.81)	(42.78)	(89.69)	(75.73)	(83.57)	(73.89)	(119.62)	(123.91)

WAITING ON

ATTACHMENT

CDK-2

AFFIDAVIT OF CHRISTOPHER D. KRYGIER

STATE OF MISSOURI)) ss COUNTY OF JASPER)
On the day of October, 2017, before me appeared Christopher D. Krygier to me personally known, who, being by me first duly sworn, states that he is the Directo of Rates and Regulatory Affairs of Empire District — Liberties Utilities Central and acknowledges that he has read the above and foregoing document and believes that the statements therein are true and correct to the best of his information, knowledge and belief.
Christopher D. Krygier
Subscribed and sworn to before me this day of October, 2017.
ANGELA M. CLOVEN Notary Public - Notary Seal State of Missouri Commissioned for Jasper County My Commission Expires: November 01, 2019 Commission Number: 15262659 Notary Public
My commission expires: