Electronically Filed in TPUC Docket Room on August 16, 2019 at 12:10 p.m.

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:	)	
	)	
APPLICATION OF TENNESSEE	)	
WATER SERVICE, INC. FOR	)	**DOCKET NO. 19-00028**
ADJUSTMENT OF RATES AND	)	
CHARGES, AND MODIFICATIONS TO	)	
CERTAIN TERMS AND CONDITIONS	)	
FOR THE PROVISION OF WATER	)	
SERVICE.	)	
	)	
	)	
	)	

REBUTTAL TESTIMONY
OF
J. BRYCE MENDENHALL

ON BEHALF OF
TENNESSEE WATER SERVICE, INC.

August 16, 2019

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Q. WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS ADDRESS?

A. My name is J. Bryce Mendenhall, and my business address is 4494 Parkway Plaza Boulevard, Suite 375, Charlotte NC 28217.

Q. ARE YOU THE SAME J. BRYCE MENDENHALL WHO SUBMITTED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to provide further detail of the work performed by the Tennessee Water Service, Inc. ("TWS" or "Company") contract operator, provide additional support for the implementation of the proposed fire service tariff, and provide detail of a comparable project to the Piney Butt Tank and Booster Station ("Piney Butt") and Clubhouse Well and Booster Station ("Clubhouse") projects to identify a reasonable replacement value at the time of the Gatlinburg Wildfires ("Wildfire").

Q. CAN YOU PLEASE EXPLAIN MR. NOVAK'S POSITION REGARDING PRO-FORMA EXPENSES FOR OUTSIDE CONTRACTORS (ACCOUNT 6370)?

A. Yes. Mr. Novak states that the Company used the Test Year actual expenses for Outside Contractors as its Attrition Year pro-forma amount. In contrast, Mr. Novak recommends using a three-year average of pre-Wildfire expenses per customer, multiplied by the Attrition Year customer count, then multiplied by the Compound Inflation Factor to attain a pro-forma annual expense level.

Q. PLEASE EXPLAIN WHY THE COMPANY'S USE OF THE TEST YEAR ACTUAL EXPENSE LEVEL IS APPROPRIATE.

A. Mr. Novak's position infers that the scope and level of the contract operator's work, and therefore the resulting expenses, fluctuate proportionately with the number of customers in the Chalet Village system. However, much of the contractor's work is not significantly or directly affected by the number of customer connections. The contractor is required to perform the following maintenance activities:

1) Service and monitor wells and tanks daily

2) Take and process bac-t samples and residual checks monthly

3) Hydrant flushing annually

4) Exercise street valves annually

5) Monitor distribution system for leaks

6) Read meters monthly

7) Respond to and resolve Field Activity orders ("FA's")

The first five items above are activities that do not depend on the number of customers connected and have been required throughout the contractor's tenure with the Company. While item #6 above is variable, the average number of connections in the Test Year was 167, barely half the Attrition Year estimate of 311, and therefore such expenses can be expected to increase beyond even the level incorporated into the Company's recommendation. For item #7, while FA's overall are lower than pre-Wildfire levels, the complexity has increased, as more customer leaks are noted and reconnections are much less straightforward and more frequent.

As described above, it is clear that the contractor's activities are largely fixed and potentially trending upward due to reconnections, which supports the use of current expenses as a better representation of activities to be performed by the contractor for the foreseeable future.

Q. DOES THE COMPANY HAVE ADDITIONAL INFORMATION TO PROVIDE TO SUPPORT THE NEED FOR THE FIRE SERVICE RATES INCLUDED IN TWS' PROPOSED TARIFF IN THIS PROCEEDING?

A. Yes. Please see Attachments 1, 2, and 3 to this testimony. Attachment 1 is a memo from the Director of Codes Enforcement at the Tennessee Fire Marshal's Office, notifying builders, fire officials, and others of the need to install fire sprinklers in houses meeting certain criteria. Attachment 2 notes the National Fire Protection Association regulation allowing for common-use supply pipes (fire sprinkler and domestic use). Attachment 3 is a copy of the Sevier County form for certifying the new structure is exempt from fire sprinkler system requirements. Taken together, these documents support the change in building code for the Chalet Village system that would require certain newly built homes to install fire service, which necessitates the proposed tariff rates included in the Company's filing.

R. PLEASE DESCRIBE MR. NOVAK'S POSITION ON THE TREATMENT OF THE PINEY BITT TANK AND BOOSTER STATION AND CLUBHOUSE WELL AND BOOSTER STATION PROJECTS IN THIS PROCEEDING.

A. Mr. Novak attempts to establish a regulatory liability that is equivalent to the rate base value of the Piney Butt and Clubhouse projects. This results in a recommended

regulatory liability of $757,006 to be established on the Company's books. Mr. Novak also identifies an annual cost for insurance premiums included in the Company's rates and that there was no value for such costs because the property insurance could not have yielded any benefit or payout.

Q. **IS THERE ADDITIONAL INFORMATION THAT SHOULD BE CONSIDERED RELATIVE TO THE COMPANY'S INSURANCE PREMIUM COST AND COVERAGE?**

First, generally speaking, the insurance premium amount Mr. Novak identifies is the Company's total cost for all insurance coverage, not just property insurance. For this cost, the Company receives the benefit of general liability, automobile, workers compensation and casualty insurance. The premium amount for just the property insurance Mr. Novak discusses is actually $528.50, as shown in the below breakdown.

Policy	TWS Cost
Auto	749
Workers Comp	1,118
Property	529
Excess Liability	1,928
Life	170
Pollution Control	276
Under 5k	33
Deductibles	918
	5,720

Second, again with respect to insurance coverage generally, Mr. Novak asserts that because the policy limit was $48,000 with a $50,000 deductible, there would never be an instance of benefit or payout on the policy. This is inaccurate. The deductible covers any single occurrence, but the policy covers all areas of affiliate systems. A single

occurrence such as a storm or other natural disaster could impact, for example, Tennessee and also nearby affiliate systems in North Carolina which could yield a benefit payment to Tennessee Water Service.

Q. WHAT ADDITIONAL ASPECTS OF THE REHABILITATION OF THE CHALET VILLAGE SYSTEM SHOULD BE CONSIDERED IN THIS PROCEEDING?

A. The Company's insurance coverage is based on an asset-by-asset replacement cost estimate by the Operations Department. These estimates are generally based on experience with construction occurring in the normal course of business. As such, disasters such as the Wildfire can create a premium on reconstruction of damages assets, due to supply/demand pressures on contractor labor and materials. The Company certainly experienced a dearth of contractors on these two projects – the Piney Butt project generated only one bid for the booster station replacement, and the Clubhouse project generated only one bidder who was adequately certified for the work needed.

In order to identify a reasonable replacement cost level that could have been incorporated into the insurance coverage, TWS recommends looking at comparable projects that the Company or its nearby affiliates had completed before the Wildfires occurred. The Company has therefore identified a project completed by its neighboring affiliate, Carolina Water Service, Inc. of North Carolina ("CWSNC"), in CWSNC's Sugar Mountain system. This system is approximately 140 miles from Chalet Village and has similar pumping needs due to the mountainous topography. With the Sugar Mountain project, an existing booster station and hydrotank were removed with a new booster

station being installed with multiple variable-frequency-drive ("VFD")-driven pumps. Comparatively, The Piney Butt and Clubhouse projects also required removal of existing booster stations and replacement with VFD pumps, as well as a tank rehabilitation (Piney Butt) and wellhead rehabilitation (Clubhouse). The Sugar Mountain project began in late 2015 and was in-service on 6/30/2016, approximately three months before the Company's property insurance policy was renewed and less than five months before the Wildfires occurred. The Sugar Mountain project had a final cost of $216,008.

Q. WHAT IS THE COMPANY'S PROPOSAL REGARDING MR. NOVAK'S RECOMMENDED REGULATORY LIABILITY?

A. The Company proposes to use the Sugar Mountain project as a reasonable proxy cost estimate for the Piney Butt and Clubhouse projects, less the insurance deductible of $50,000, to calculate the shortfall in replacement cost in the Company's insurance coverage at the time of the Wildfires. This would result in a regulatory liability computed as follows:

Proxy Cost:	**Amount**
Piney Butt	216,008
Clubhouse	216,008
Total Cost	432,016
Less: Deductible	(50,000)
Under-Reported Cost	382,016

The Company proposes an amortization period consistent with the depreciation rate for the two projects, or 66.67 years, resulting in an annual amortization expense of $5,730. The ratepayers will benefit from the long life of these new assets in comparison to the much shorter expected remaining life of the original facilities.

Q. ARE THERE ANY OTHER CONSIDERATIONS RELEVANT TO THE COMPANY'S PROPOSAL AND THE COMMISSION'S DECISION?

A. Yes. Mr. Novak's proposed adjustment is punitive in nature in light of the benefit customers receive of brand-new assets which replaced infrastructure that were more than 35 years old. It is unjust to deprive the Company of the benefit of all of its prudently-incurred costs to replace and modernize these assets when customers will benefit from them for many years to come. The AG's proposed approach would have a substantial long-term, adverse impact on the Company's ROE (approximately 525 basis points) that could impose negative implications on the need to continue attracting capital for investment. We respectfully request that the Commission take a more measured approach and consider all the facts and circumstances involved including the ongoing benefits to customers of the new and improved assets, the Company's financial integrity, and the need to access future capital when making its decision on this important issue.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does. However, I reserve the right to update or amend my testimony as new data or information becomes available.

ATTACHMENT 1

TN Department of Commerce & Insurance

MEMO

To: Building and Fire Officials, and Owners, Designers and Contractors of Transient Rental Homes
From: Chris Bainbridge, Director of Codes Enforcement
Gary Farley, Director of Electrical, Residential and Marina Inspections
Date: January 29, 2016
Subject: Transient Rental Homes and Cabins

In April 2014, the State Fire Marshal's Office ("SFMO") discovered that, in some areas of the state, transient rental homes and cabins were classified as one- and two-family dwellings. After a fatal fire with multiple victims in one of these buildings, the SFMO researched the classification of the buildings. The SFMO determined at that time that transient rental homes and cabins should not be classified as one- and two-family dwellings, subject to the International Residential Code ("IRC"), because occupants were not familiar with the building, hindering escape in the case of an emergency. Rental homes and cabins occupied on a transient basis (for no more than thirty (30) days) would be more appropriately classified under the International Building Code ("IBC") as R-1 occupancies. These occupancies require plan submission, approval and inspection by the SFMO. The SFMO authorized jurisdictions with exemptions for commercial buildings to regulate them locally. The SFMO also made special provisions for buildings that were three (3) or fewer stories and less than five-thousand (5,000) square feet.

Subsequent discussions regarding the classification of these buildings as R-1 were held with stakeholders across the state. With input from various industries and regulators, the Department of Commerce and Insurance ("Department") determined to adopt rules which balanced the risks and construction challenges specific to transient rental homes and cabins. A public rulemaking hearing to amend Tenn. R. & Regs. 0780-02-23 (One and Two Family Dwellings and Townhouses) was held on November 2, 2015. The formal rulemaking process has concluded, and the amended rules will take effect in the near future but as yet an undetermined date. However, in an effort to better serve those impacted by the regulations, the Department has chosen to provide the updated provisions listed below for these buildings. The new provisions are as follows:

1. A transient rental home ("TRH") is a building that is a single dwelling unit providing complete independent living facilities including, but not limited to, permanent provisions for living, sleeping, eating, cooking and sanitation occupied for thirty (30) days or less. These include rental cabins, buildings offered for rent on Airbnb and similar services, yurts and similar structures.

2. TRHs with three (3) or less stories, less than five-thousand (5,000) gross square feet, and twelve (12) or fewer occupants shall be classified as one- and two- family dwellings subject to Tenn. Comp. R. & Regs. 0780-02-23 (One and Two Family Dwellings and Townhouses). These buildings may be regulated by cities and counties that have received an exemption to enforce codes for one- and two-family dwellings and townhouses from the SFMO. These buildings are subject to the fire sprinkler exemptions of Tenn. Code Ann § 68-120-101(a)(8)(A).

3. TRHs with thirteen (13) or more occupants, four (4) or more stories, or five-thousand (5,000) gross square feet or more are to be classified as R-3 and subject

TN Department of Commerce & Insurance

MEMO

to the IBC and Tenn. Comp. R. & Regs. 0780-02-03 (Review of Construction Plans and Specifications). These buildings may be regulated by cities and counties that have received an exemption to enforce codes for *commercial* buildings from the SFMO. These buildings are *not* subject to the fire sprinkler regulations of Tenn. Code Ann § 68-120-101(a)(8)(A).

4. A boarding house or congregate living facility shall meet the requirements of the applicable standards adopted pursuant to Tenn. Code Ann. § 68-120-101 and Tenn. Comp. R. & Regs. 0780-02-02 (Codes and Standards) and 0780-02-03 (Review of Construction Plans and Specifications).

5. For the purposes of this memo:

    a. *Gross square feet* is the area of all floors within the outside perimeter of the exterior walls. *Gross square feet* includes any finished or occupied basements.

    b. A basement counts as a story if: 1) The finished surface of the floor above the basement is more than six (6) feet above grade plane; or 2) The finished floor surface of the floor above the basement is more than twelve (12) feet above finished ground level at any point. Grade plane is a reference plane representing the average finished ground level adjoining the building at exterior walls.

These new provisions will take effect on February 1, 2016, and may be utilized by local jurisdictions. Buildings that are currently under construction may additionally meet the new provisions.

Questions about SFMO's regulations of TRHs may be directed to Chris Bainbridge at 615.741.6246 or christopher.bainbridge@tn.gov, or to Gary Farley at 615.741.7170 or gary.farley@tn.gov.

ATTACHMENT 2

5.2.10 Other joining methods investigated for suitability in automatic sprinkler installations and listed for this service shall be permitted.

5.3* Underground Pipe. Any type of pipe or tube acceptable under the applicable plumbing code for underground supply pipe shall be acceptable as underground supply for fire sprinkler system when installed between the point of connection and the system riser.

5.4 Pre-engineered Systems. Where listed pre-engineered systems are installed, they shall be installed within the limitations that have been established by the testing laboratories.

Chapter 6 Water Supply

6.1 General Provisions.

6.1.1 Every automatic sprinkler system shall have at least one automatic water supply.

6.1.2 Where stored water is used as the sole source of supply, the minimum quantity shall equal the water demand rate times 10 minutes unless permitted otherwise by 6.1.3.

6.1.3 Where stored water is used as the sole source of supply, the minimum quantity shall be permitted to equal the two sprinkler water demand rate times 7 minutes where dwelling units meet the following criteria:

(1) One story in height
(2) Less than 2000 ft^2 (186 m^2) in area

6.1.4 The stored water requirement of 6.1.2 or 6.1.3 shall be permitted to be a combination of the water in the well (including the refill rate) plus the water in the holding tank if such tank can supply the sprinkler system.

6.2* Water Supply Sources. The following water supply sources shall be considered to be acceptable by this standard:

(1) A connection to a reliable waterworks system with or without an automatically operated pump
(2) An elevated tank
(3) A pressure tank designed to American Society of Mechanical Engineers (ASME) standards for a pressure vessel with a reliable pressure source
(4) A stored water source with an automatically operated pump
(5) A well with a pump of sufficient capacity and pressure to meet the sprinkler system demand

6.2.1* Prior to system acceptance, a system utilizing a pump shall be tested by opening the drain/test connection.

6.2.1.1 The pump shall sense the flow, turn on, and flow water for the required duration of 6.1.2 or 6.1.3 without interruption.

6.2.2 Where a pump and tank is the source of supply for a fire sprinkler system but is not a portion of the domestic water system, the following shall be met:

(1) A test connection shall be provided downstream of the pump that creates a flow of water equal to the smallest sprinkler on the system. The connection shall return water to the tank.
(2) Pump motors using ac power shall be connected to a 240 V normal circuit.
(3) Any disconnecting means for the pump shall be approved.
(4) A method for refilling the tank shall be piped to the tank.
(5) A method of seeing the water level in the tank shall be provided without having to open the tank.
(6) The pump shall not be permitted to sit directly on the floor.

6.2.3* Where more than one dwelling unit is served by the same water supply pipe, each dwelling unit shall have an individual control valve that serves the fire sprinkler system in that dwelling unit and the owner shall have access to the valve that controls the sprinkler system in their unit.

6.2.3.1 The control valve shall be permitted to serve the domestic water supply.

6.2.3.2 In the situation addressed by 6.2.3, no valve controlling the sprinkler system in a unit shall be located in another unit.

6.3* Multipurpose Piping System.

6.3.1 A multipurpose piping system shall be installed in accordance with 6.3.2 through 6.5.4.

6.3.2 Multipurpose piping systems shall be approved by the local plumbing or health authority.

6.3.3 All piping in the system supplying sprinklers shall be listed and conform to the piping specifications of this standard.

6.3.3.1 Piping connected to the system that supplies only plumbing fixtures shall comply with local plumbing and health authority requirements but is not required to be listed.

6.4 Manufactured Home Water Supply. For sprinklered buildings manufactured off-site, the minimum pressure needed to satisfy the system design criteria on the system side of the meter shall be specified on a data plate by the manufacturer.

6.5 Common Supply Pipes.

6.5.1 Where common supply pipes serve both fire sprinkler and domestic use, they shall comply with 6.5.2 through 6.5.4.

6.5.2 In common water supply connections serving more than one dwelling unit, 5 gpm (19 L/min) shall be added to the sprinkler system demand to determine the size of common piping and the size of the total water supply requirements where no provision is made to prevent flow into the domestic water system upon operation of a sprinkler.

6.5.3 A warning sign, with minimum ¼ in. letters, shall be affixed adjacent to the main shutoff valve and shall state the following:

> **WARNING:** The water system for this home supplies fire sprinklers that require certain flows and pressures to fight a fire. Devices that restrict the flow or decrease the pressure or automatically shut off the water to the fire sprinkler system, such as water softeners, filtration systems, and automatic shutoff valves, shall not be added to this system without a review of the fire sprinkler system by a fire protection specialist. Do not remove this sign.

6.5.4 Where water treatment and filtration are installed, one of the following conditions shall be met:

(1) The flow restriction and pressure loss through the water treatment equipment shall be taken into account in the hydraulic calculations.
(2) An automatic bypass shall be installed around the water treatment equipment that directs all water directly to the system.

Chapter 7 Installation

7.1 Valves.

7.1.1 A single control valve arranged to shut off both the domestic system and the sprinkler system shall be installed unless a separate shutoff valve for the sprinkler system is installed in accordance with 7.1.2.

7.5.6* Painting and Ornamental Finishes. Sprinklers shall not be painted or enameled unless applied by the manufacturer and the sprinkler has been listed with such finishes.

7.5.7 Escutcheon Plates. Where nonmetallic sprinkler ceiling plates (escutcheons) or recessed escutcheons (metallic or nonmetallic) are used, they shall be listed based on testing of the assembly as a residential sprinkler.

7.5.8 Solvent Cement. Where solvent cement is used as the pipe and fittings bonding agent, sprinklers shall not be installed in the fittings prior to the fittings being cemented in place.

7.6* Alarms. Local waterflow alarms shall be provided on all sprinkler systems in homes not equipped with smoke alarms or smoke detectors in accordance with *NFPA 72, National Fire Alarm and Signaling Code.*

7.7 Attics. When nonmetallic piping is installed in attics, adequate insulation shall be provided on the attic side of the piping to avoid exposure of the piping to temperatures in excess of the pipe's rated temperature.

Chapter 8 System Design

8.1 Design Criteria.

8.1.1 Design Discharge.

8.1.1.1 Sprinklers That Are Not Listed with Specific Discharge Criteria.

8.1.1.1.1 The system shall provide a discharge of not less than 13 gpm (49 L/min) per sprinkler simultaneously to all of the design sprinklers.

8.1.1.1.2 The system shall provide a discharge of not less than 18 gpm (68 L/min) to any sprinkler in the system.

8.1.1.2* Sprinklers That Are Listed with Specific Discharge Criteria.

8.1.1.2.1 The system shall provide at least the flow required for the multiple and single sprinkler operating criteria specified by the sprinkler listing.

8.1.1.2.2* The system shall provide at least the flow required to produce a minimum discharge density of 0.05 gpm/ft^2 (2.04 mm/min) to the design sprinklers.

8.1.2* Number of Design Sprinklers. The number of design sprinklers under flat, smooth, horizontal ceilings shall include all sprinklers within a compartment, up to a maximum of two sprinklers, that require the greatest hydraulic demand.

8.1.3 Sprinkler Coverage.

8.1.3.1 Residential Sprinklers.

8.1.3.1.1 Sprinklers shall be installed in accordance with their listing where the type of ceiling configuration is referenced in the listing.

8.1.3.1.2* Where construction features or other special conditions exist that are outside the scope of sprinkler listings, listed sprinklers shall be permitted to be installed beyond their listing limitations.

8.1.3.1.3 Sloped Ceilings.

8.1.3.1.3.1 Where the ceiling is sloped, the maximum *S* dimension shall be measured along the slope of the ceiling to the next sprinkler, as shown in Figure 8.1.3.1.3.1.

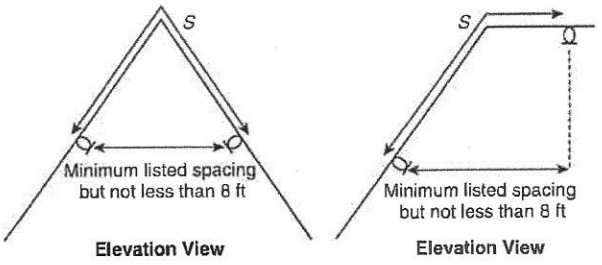

FIGURE 8.1.3.1.3.1 Measuring *S* Dimension.

8.1.3.1.3.2 The sprinklers shall maintain the minimum listed spacing, but no less than 8 ft (2.44 m), measured in the plan view from one sprinkler to another, as shown in Figure 8.1.3.1.3.1.

8.1.3.2 Nonresidential Sprinklers. Sprinklers other than residential sprinklers shall be installed in accordance with the coverage criteria specified by NFPA 13, *Standard for the Installation of Sprinkler Systems.*

8.1.4 Operating Pressure. The minimum operating pressure of any sprinkler shall be the higher of the minimum operating pressure specified by the listing or 7 psi (0.5 bar).

8.2 Position of Sprinklers.

8.2.1 Residential Pendent and Upright Sprinklers.

8.2.1.1 Pendent and upright sprinklers that have not been listed with specific positioning criteria shall be positioned so that the deflectors are within 1 in. to 4 in. (25.4 mm to 102 mm) from the ceiling unless otherwise permitted by 8.2.1.3.

8.2.1.2 Pendent and upright sprinklers that have been listed with specific positioning criteria shall be positioned in accordance with their listing unless permitted otherwise by 8.2.1.3.

8.2.1.3 Pendent and upright sprinklers in closets shall be permitted to be installed within 12 in. (305 mm) of the ceiling in order to avoid obstructions near the ceiling.

8.2.2 Residential Sidewall Sprinklers.

8.2.2.1 Sidewall sprinklers that have not been listed with specific positioning criteria shall be positioned so that the deflectors are within 4 in. to 6 in. (102 mm to 152 mm) from the ceiling.

8.2.2.2 Sidewall sprinklers that have been listed with specific positioning criteria shall be installed in accordance with their listing.

8.2.3 Nonresidential Sprinklers. Sprinklers other than residential sprinklers shall be positioned in accordance with the positioning criteria specified by NFPA 13, *Standard for the Installation of Sprinkler Systems.*

8.2.4 In basements where ceilings are not required for the protection of piping or where metallic pipe is installed, residential sprinklers shall be permitted to be positioned in a manner that anticipates future installation of a finished ceiling.

8.2.5* Obstructions to Residential Sprinklers.

8.2.5.1 Closets. In all closets, including those closets housing mechanical equipment, that are not larger than 400 ft^3 (11.3 m^3) in size, a single sprinkler at the highest ceiling space in the closet shall be sufficient without regard to obstructions.

ATTACHMENT 3

SINGLE FAMILY DWELLING USE FORM

Transient rentals are occupancy of a single dwelling unit for 30 days or less.

Project Address: _____

_____

(Please check one)

_____This dwelling is not intended for overnight rental use.

_____This dwelling is intended for overnight rental use. This dwelling is three (3) or less stories, less than five-thousand (5000) gross square feet and maximum occupancy is set at 12 or fewer.

In the event owner changes any project use from permanent to transient that exceeds three (3) or more stories, is five-thousand (5000) or more gross square feet or an occupancy of 13 or more, Owner shall notify Sevier County Building Inspections and the State of Tennessee Fire Marshal's Office. Such change may be required to be permitted by Sevier County and/or the State of Tennessee Fire Marshal's Office. I swear the above information is true and correct to the best of my knowledge, information and belief.

Property Owner:_____

Phone Number:_____

Signature of Owner: _____ Date: _____

NOTARY REQUIRED

STATE OF: _____ COUNTY OF: _____

Before me, the undersigned authority, personally appeared the within named bargainor, _____, and who acknowledged that he / she executed the foregoing instrument for the purposes therein contained.

WITNESS my hand and official seal at office in said State and County this the _____Day of _____, _____.

_____
NOTARY PUBLIC

My Commission Expires: _____.