



**Duquesne Light**  
Our Energy...Your Power

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**Tishekia E. Williams**  
Senior Counsel, Regulatory

January 8, 2014

**VIA OVERNIGHT MAIL**

Rosemary A. Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

RE: Universal Service and Energy Conservation Plan  
Docket No. M-2013-2350946

Dear Secretary Chiavetta:

Enclosed for filing are Duquesne Light Company's Comments to the Pennsylvania Public Utility Commission's Tentative Order issued in the above-referenced docket.

Please feel free to contact me should you have any questions.

Sincerely,

Tishekia E. Williams

TEW/plg

Enclosure

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Duquesne Light Company Universal Service** : **Docket No. M-2013-2350946**  
**And Energy Conservation Plan for 2014-2016** :  
:

**COMMENTS OF DUQUESNE LIGHT COMPANY**

Duquesne Light Company (“Duquesne Light” or “Company”) hereby submits comments in response to the Pennsylvania Public Utility Commission (“Commission” or “PUC”) Tentative Order entered in the above captioned docket on December 19, 2013.

**I. INTRODUCTION**

Pursuant to Commission regulations, 52 Pa.Code.§ 54.74(a), Duquesne Light is required to file its Universal Service and Energy Conservation Plans for Commission approval on a staggered three basis. On February 28, 2013, the Company filed its proposed 2014-2016 Universal Service and Energy Conservation Plan (“2014-2016 USP”) proposing substantial enhancements to its Customer Assistance Program (“CAP”), among other things. On June 28, 2013, the Company filed a Petition for Approval and Modification of its 2014-2016 Universal Service and Energy Conservation Plan. The amended 2014-2016 USP addressed CAP customers’ ability to purchase electric generation from electric generation suppliers (“EGS”). On July 18, 2013, the Coalition for Affordable Utility Service and Energy Efficiency (“CAUSE-PA”) filed an Answer. On July 19, 2013, the Office of Consumer Advocate (“OCA”) filed an Answer. On December 19, 2013, the Commission issued its Tentative Order directing the Company to file comments addressing various issues identified in the Company’s plan, various informal complaints received by the Bureau of Consumer Services (“BCS”), and other

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information provided by the Company. Specifically, the Tentative Order directs the Company to address the following:

1. Application of excess CAP payments to pre-program arrearages;
2. Application of full CAP credits to customer accounts monthly;
3. Compliance of Duquesne's CBOs and contractors with obligations incumbent upon utilities, including accessibility and training;
4. Duquesne's outbound call campaign to enroll into CAP customers in danger of termination;
5. CAP monitoring activities and referrals to LIURP;
6. Requirements for customers who complete a zero income form;
7. Automatic recertification process for CAP customers;
8. LIURP eligibility criteria for customers with special needs/disabilities;
9. Whether Duquesne intends to increase the percentage of customers beyond 20% in 150%-200% FPIG for LIURP, which would in turn require a waiver of Commission regulations;
10. Coordination with NGDCs, consistent with Act 129 mandates, to increase efficiency and cost savings for LIURP;
11. LIURP reporting procedures to ensure that all variables are addressed with supporting data;
12. Remedial education data relative to Smart Comfort recipients with increased usage;
13. Training plans and requirements for weatherization contractors;
14. Application of Dollar Energy Fund grants to customer accounts to alleviate hardships
15. Separation of Dollar Energy Grant money from dollars recovered through base rates; and
16. LIURP needs assessment, enrollments, budget, and number of LIURP jobs.

Herein, the Company addresses each of the issues identified in the Tentative Order.

## 1. Excess CAP Payment to Pre-Program Arrearages

In the Tentative Order, the Commission directs that customer payment made above the monthly amount requested should be applied to missed CAP payments and future bills, not frozen arrears. As discussed in the Company's 2014-2016 USP, there are several benefits available to customers enrolled in the Company's CAP. Customers receive a discount on their monthly usage based on their income by having a credit applied to what would otherwise be their budget billing amount based on full tariff rates. Customers that enroll in CAP with a past due balance also have an opportunity to earn arrears forgiveness with each payment made on time and in full. Under the Company's current processes, when a customer is enrolled in CAP, any payments made by the customer above the monthly "ask to pay"<sup>1</sup> amount is applied to the frozen arrearage. The "asked to pay" amount includes missed CAP payments and current CAP payments due, but not frozen arrears. The Company's current process is designed to comply with the Commission regulations by maintaining the cost effectiveness of the program for non-CAP participants. *See* 52. Pa.Code. §54.73. Reducing the arrears forgiveness reduces the amount paid by other residential customers.<sup>2</sup>

Upon review, the Company believes that the cost impact to non-residential customers and Duquesne Light may be minimal as compared to the benefits to CAP customers and therefore accepts this amendment. Based on data from 2012, the Company receives an average of approximately \$15,000 in excess payments from CAP customers, which is applied to reduce the

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<sup>1</sup> The "ask to pay" amount as the amount required to keep the account in good standing and out of delinquency status.

<sup>2</sup> The Tentative Order suggests that this process conflicts with the Company's commitment to extend "every reasonable consideration to CAP customers to avoid dismissal from the program." Duquesne Light wishes to clarify that customers are not removed from CAP for failure to pay their monthly asked to pay amount or frozen arrears. If a customer is defaulted from CAP with arrears that have not been forgiven, the customer is required to pay the total account balance including frozen arrears. In accordance with the proposed 2014-2016 plan amendments, and upon final Commission approval, these customers will have the option to receive a restoration payment agreement.

Company and residential customer's CAP costs. If all customer payments made above the monthly amount requested are applied to missed CAP payments and future bills, adoption of the Commission's recommendation would increase the Company's CAP budget by approximately \$15,000 per year.

Additionally, adoption of this mandate would require systems modifications, which are estimated to cost approximately \$18,000. The information technology ("IT") costs are capital, and may not be recovered through the Company's Universal Service Surcharge under the terms of the Company's Universal Service Charge – Rider No. 5, and Commission precedent.<sup>3</sup>

Accordingly, the Company will seek recovery of these Commission mandated expenses in a future base rate case.<sup>4</sup> Additionally, the design, build and testing of these system changes are projected to be complete and in-service by July 2014. Subject to the foregoing, the Company will apply CAP customer payments exclusively to missed CAP payments and future bills.

## **2. Application of Full CAP Credit to Customer Accounts Monthly**

The Commission's Policy Statement on Customers Assistance Programs provides that annual maximum CAP credits should be limited to \$560 per electric non-heating customer and \$1,400 per electric heating customer. 52. Pa.Code §§69.285(3)(5)(B)-(C). The Company currently adheres to the Commission's policy statement regarding maximum CAP credits. Under current Company processes, CAP customers are billed at a percentage of what would be the full tariff amount based on their household income and occupancy. The deficiency between the

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<sup>3</sup> Utilities are not permitted to recover capital costs through a reconcilable mechanism unless specifically authorized by statute. See *Popowsky v. Pa. P.U.C.*, 869 A.2d 1144 (Pa. Cmwlth. 2005)

<sup>4</sup> The Company presently has a distribution base rate increase pending before the Commission at docket number R-2012- 2372129.

billed amount based on full tariff rates and the CAP budget amount based on the customers' income and occupant information is known as the deficiency or CAP credit. CAP credits are applied to the deficiency subject to the maximum amount available per year.

However, if the CAP credits available are not sufficient to cover the deficiency for the months billing, the credit is not applied until the credits are replenished at recertification, or the customer's usage is reduced such that the remaining CAP credit covers the deficiency. Under this procedure, some customers may not receive a CAP credit each month. In very limited circumstances, a customer may not receive the total CAP maximum credits. In addition, because the CAP credits are applied to customers account annually, as opposed to monthly at the time of billing, this amount may vary depending on the customer's budget and asked to pay amount.

In the Tentative Order, the Commission directs the Company to make adjustments to its billing systems to avoid the confusion that may result from changes in the payment required each month. The Company proposes to adjust its current process to apply CAP credits to customers account monthly at the time of billing, and until the CAP credits are completely exhausted. Writing off CAP credits immediately will eliminate the bounce effect that was referenced in the Tentative Order. However, because only 10-12% of Duquesne Light customers typically reach the CAP maximum, the Company does not recommend spreading the CAP credits evenly over the 12 month period for all CAP customers. The Company believes that spreading the credits evenly over a 12 month period would substantially increase the costs of the Company's CAP program by applying the maximum CAP credit to each CAP customer account without regard to the customers' ability to pay and would not encourage conservation. Additionally, the Company will change the manner in which the deficiency is calculated. The deficiency will be calculated

as the difference between the budget billed amount based on full tariff rates and the CAP budget amount based on the customer' income and occupant information.

### **3. Telephone Coverage at CAP Agencies Including Accessibility and Training.**

Consistent with 52 Pa.Code § 69.265(6), Duquesne Light uses community-based organizations ("CBO") to administer its universal services programs, including CAP. The Company agrees that access to program administrators is essential to meet the needs of our customers. The Company is engaging in a competitive bid process to select a CBO to administer its universal service programs for 2014-2016. Accordingly, the Company will execute new contracts with the winning CBO to administer its universal programs. The Company will include provisions within the new contracts to ensure that the CBO is accessible to customers by telephone. Additionally, the Company is implementing new monitoring procedures that will ensure that all customers receive a call back within two business days. The Company also notes that CAP customers may visit CAP offices with walk in office hours available if they need to contact a CAP Case Manager immediately or they may contact Duquesne Light directly to receive assistance via its direct Universal Service line at 1-(888)-393-7600.

The Company also agrees to review and update CBO training documentation and manuals and to hold an annual training refresher meeting with CBO staff. The Company will review new hire training and how remedial training is provided for all CBO staff members and make modifications and/or suggestions as necessary.

#### **4. Enrolling customers in termination status in CAP.**

In 2009, AECOM estimated that 75% of Duquesne Light customers in the termination process may be eligible to participate in CAP. The Company does not believe that this estimate accurately reflects current or future (2014-2016) conditions. Based upon the Company's own analysis of occupant and income information provided to the Company in 2009, only 17.4% of delinquent customers were determined to be less than 150% of poverty and in turn would qualify for CAP. In 2012 and 2013, the Company performed the same analysis indicating only a small fluctuation in the number of delinquent customers eligible for CAP ranging from 16.8% in 2012 to 17.4% in 2013. If all delinquent customers were considered eligible for CAP where the *percentage of poverty level was unknown, this percentage would rise to 50%.*

As part of the operations audit of Duquesne Light conducted by the Commission's Bureau of Audits in 2012, it was recommended that Duquesne reduce arrearages by enrolling low-income customers in either a payment plan or CAP (D-2011-2269361, Focused Management and Operations Audit of Duquesne Light Company, p.56-60). Duquesne responded to this recommendation by stating that it would start segmenting customers based on internal credit behavioral scores and implement a revised outbound call campaign. Although Duquesne Light will not be able to segment customers based on their internal behavioral credit score until the implementation of its new customer information system in July of 2014, the Company has segmented customers in its current system based on their known percentage of poverty level (FPI category) to make outbound referral campaigns. Arrearages have decreased from over \$47.8M in December of 2012 to \$42.8 in December of 2013. The Company will continue these outbound campaign efforts to make them ongoing for both CAP and Assistance Referrals.

## **5. CAP Agency and Account Monitoring**

Pursuant to 52 Pa.Code §69.265(6)(vii), CAP customer accounts should be monitored for payment and energy consumption. While CAP account monitoring is not conducted exclusively by CAP Case Representatives, CAP accounts are monitored for both payment and energy consumption. As it relates to usage, the Company systematically generates high use consumption reports. These reports are provided to our Low Income Usage Reduction Program (“LIURP”) contractors to monitor and determine if a LIURP visit should be scheduled with the customer to review energy usage and conservation measures. The Company considers usage above 500 kWh per month in the shoulder months, or a significant increase in usage based on the customers prior usage to be high consumption. Degree days are not considered in the analysis because customer usage is evaluated based on the non-heating or cooling months. When a customer meets this criterion, the account is included on the high use consumption report. The report is reviewed weekly with appointments set within a two week period based on customer availability.

Likewise, on a case-by-case basis, and at the discretion of the CAP Case Representatives, CAP customers are contacted and reminded of payments due by the CAP Case Representative. Presently, the Company does not have written procedures that detail when a CAP Case Representative is required to contact a customer regarding payment as collections are generally handled by Duquesne Light employees. CAP customers are subject to the collections procedure used by Duquesne Light. Accordingly, Duquesne Light, as opposed to the CBO, monitors missed payments, sends letters, conducts calls and posts information at the premise. In addition, if a customer situation is identified, Duquesne Light will make direct referrals to the CAP Case Manager to assist the customer. Based on the various collections efforts undertaken by the

Company directly, it's not clear if additional reminders would be effective in improving collections for CAP participants. However, the Company will review and evaluate this issue in conjunction with its general evaluation of its universal service programs.

## **6. Zero Income Form**

Customers who apply for the Company's CAP Program and report \$0 income are required to complete a zero income form and give permission to verify their income with government agencies. *The Company may contact these customers periodically to determine if there has been a change in employment status.* On the form, the Company requests that the customer identify all household members, the address and a brief explanation of how household expenses are met, similar to the process used by the Pennsylvania Department of Public Welfare. The customer must sign and date the form; however the Company does not require that the form be notarized.

## **7. Automatic Recertification**

Under the Company's current processes, the Company recertifies CAP customers annually. Customers that make 9 monthly payments in a 12 month period are automatically recertified for one year. All CAP customers, regardless of payment status, must verify their income and household information at least biannually. In the Tentative Order, the Commission states that "we prefer that the receipt of a LIHEAP grant be the only mechanism for automatic recertification by a household for CAP." The Company agrees that payment status will no longer be used for automatic recertification. The Company will continue to use receipt of LIHEAP grants provided that the percentage of poverty to qualify for LIHEAP and the

Company's CAP eligibility requirements are the same. The Company will request income and occupant information be updated annually per a formal letter request to ensure that customers are enrolled at the appropriate tier. However, the customer will only be defaulted from the CAP program bi-annually if they do not provide such requested materials.

Additionally, adoption of this mandate would require systems modifications, which are estimated to cost \$17,250. The IT costs are primarily capital and as previously discussed may not be recovered through the Company's Universal Service Surcharge under the terms of the Company's Universal Service Charge – Rider No. 5, and Commission precedent. Accordingly, the Company will seek recovery of these expenses in a future base rate case. The design, build and testing of these system changes are projected to be complete and in-service by July 2014.

## **8. LIURP/Smart Comfort Eligibility**

### **a. Special Needs Customers**

In its Tentative Order, the Commission notes that the Company does not identify required eligibility for those with special needs. The Company generally adheres to the Commission's definition of special needs at 52. Pa.Code.§ 58.2. A special needs customer is a customer having an arrearage with the Company and whose household income is at or below 200% of the Federal poverty guidelines. The Company does not maintain separate eligibility criteria for special needs customers for LIURP.

### **b. Customers served between 150-200% of Federal poverty guidelines**

The Company's 2014-2016 USP also notes that no more than 50% of all LIURP jobs should be targeted to customers whose income is above 150% of the Federal poverty guidelines. The

Company does not intend to increase the percentage of customers served in the 150%-200% of Federal poverty guidelines category. The Company also does not anticipate that visits to customers in this income bracket will exceed 20% the Company's annual budget. Should this assumption change, the Company would seek any necessary and appropriate waivers of Commission regulations.

c. Program integration and coordination

The Company has, and will continue to coordinate its LIURP weatherization programs with its Act 129 programs, as well as gas company LIURP programs. This commitment was detailed and previously approved by the Commission in the Company's Phase II Energy Efficiency and Conservation Plan, docket number M-2012-2334399. The Company reached a settlement in that case which provides that "Duquesne Light will refer confirmed low-income customers who participate in any of its general residential programs to its Act 129 low-income programs (specifically the Whole House Retrofit Program), its Universal Service programs, and the Low-Income Home Energy Assistance Program (LIHEAP)." The settlement further provides "Duquesne Light will leverage Act 129 programs by referring customers to existing universal service programs and LIURP resources and coordinating with natural gas distribution companies (NGDC) and community based organizations (CBOs) to provide low income services. Duquesne Light will facilitate this coordination by inviting representatives from the NGDCs with overlapping service territories to its Act 129 Stakeholder meetings and will place the issue of Duquesne Light/NGDC coordination on the agenda of those meetings."

Duquesne Light also partners with local gas companies to assist customers who meet Duquesne Light's USP eligibility criteria by providing weatherization/insulation, education and furnace assistance. Where possible, the common CBO weatherization contractor will perform

both a gas and electric energy audit at the same visit to the customer's home. Measures installed will be paid for by the utility company benefiting from the energy efficient measure installed and the cost of the audit will be shared. In the event that an electric energy audit was scheduled for the sole purpose of fulfilling the Company's USP requirements, the energy auditor will ask the customer if they would like for the gas utility company to contact them for a possible energy audit concentrating on the gas end use measures. If the customer expresses interest they are required to sign a consent form allowing Duquesne Light to provide their name, address and phone number to the gas company serving their home. Through early November, 2013, there were approximately 200 consent forms signed by the customer and forwarded to the appropriate gas company for follow up.

d. LIURP Reporting and Weather Normalized Data

The majority of Duquesne Light LIURP jobs completed are baseload jobs. In 2012, 93% of LIURP visits completed were baseload jobs. Duquesne Light has a small percentage of electric heating homes in Allegheny and Beaver counties. Of the 585,000 customers served by Duquesne Light, only 5% are electric heat. Because of the minimal number of electric heating customers and the types of LIURP jobs completed by Duquesne Light, it is not clear that weather normalizing data provides a more accurate basis for statistical analysis than information currently provided. Duquesne Light would welcome the opportunity to discuss current data inputs for LIURP reporting and solicit input on future data submissions to best meet the reporting and analysis needs of the Commission. This would help determine if there are other alternatives to help make comparisons and reasonable conclusions based on utility submitted data.

However, as the adoption to weather normalize data was mandated, Duquesne would need to implement systematic changes to weather normalize its LIURP data on an annual basis. These costs were estimated to be approximately \$45,000. These IT costs would be capital and recovered in a future base rate proceeding.

e. Remedial Education Variables

Duquesne Light is not opposed to identifying customers that need remedial education after receiving LIURP services. However, the vehicle and format in which this data should be provided is unclear. Duquesne will work with BCS staff to identify required inputs and the frequency of data submission.

f. LIURP Training

Current training plans and requirements of Duquesne's weatherization contractors are maintained and administered by Duquesne Light's weatherization contractor CCI. The Company is engaging in a competitive bid process to select a weatherization contractor to administer its LIURP program for 2014-2016. Accordingly, the Company will execute new contracts with the winning weatherization contractor and require all training plans and training documents to be provided to Duquesne Light. The Company will include provisions within the new contracts to ensure that the weatherization contractor works with Duquesne Light to create a detailed training plan that will include a review of latest technologies, health and safety protocols and all aspects and details of required data reporting necessary to calculate valid or reliable program savings.

**9. Hardship Fund**

The Company's Hardship Fund is a partnership between the Company and the Dollar Energy Fund ("DEF"). The purpose of the program is to help customers who have an overdue balance and inability to pay by providing grants up to \$500.00 which is applied to the customers' utility bill. If a grant recipient is enrolled in CAP, the grant is applied to the CAP credit balance, and then the frozen arrears.

In the Tentative Order, the Commission states that a grant applied in this manner does not fulfill the intended purpose of alleviating a customer hardship. The Company believes that DEF grants assist customers below 200% of the Federal poverty guidelines in a number of ways. First, customers that are not enrolled in CAP benefit from the grant by reducing their asked to pay amount. The grant is applied to the customers' arrears and current charges. For CAP customers, the DEF grant benefits the customer by reducing the risk of the customer reaching or exceeding the CAP maximum. Likewise, if a CAP customer defaults from CAP, the arrears balance would become due and is reduced by DEF grant.

Finally, DEF grant costs are largely below the line. Duquesne Light recovers only \$75,000 in administrative costs through its Universal Service Surcharge; however, the actual grant costs are not recovered from customer payments. DEF grants reduce the CAP credit balance prior to the write off. Only actual write offs are recovered through the Universal Service Surcharge. Nonetheless, moving forward the Company will apply DEF payments to CAP customer accounts in the same manner as LIHEAP and customer payments to ensure consistency in payment application. This change will become effective in July 2014 concurrent with the changes in application of customer payments discussed above.

## **10. Needs Assessment**

The Commission's regulations, 52 Pa.Code §§ 54.74(b)(3), require the Company to conduct and provide a needs assessment for each component of its universal services plan. Moving forward, the Company will provide needs assessment for its CAP, LIURP, CARES and Hardship Fund programs in its universal service plan filing.

## **11. CAP Enrollment Levels**

The Company agrees that the CAP enrollment projections included in its prior 2010-2012 USP required some changes, which are partially reflected in the CAP enrollment projections included in the 2014-2016 USP under consideration. The Company's method of projecting enrollment levels is based on a 5 year average. Estimates will decline if enrollment remains steady at 37,000 customers. However, the Company has made efforts to increase CAP awareness and enrollment by completing outbound referral campaigns, partnering with the United Way 211 center to refer eligible customers to the CAP program, and completing marketing campaigns with the Port Authority of Allegheny County. Due to other factors such as CAP portability, the ability to remain on CAP with a restoration agreement and other economic factors, the Company will continue to use the 5 year average for its 2014 CAP expenditure budget but will review this methodology to reduce this to a 3 year average if actual expenditures are more than 10% higher or lower than the forecasted budget.

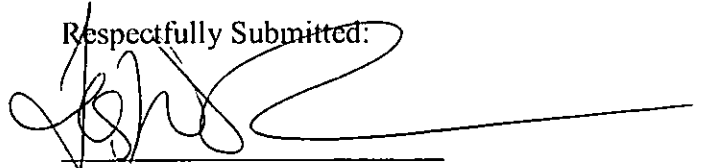
## **12. LIURP Enrollment Levels**

As explained in the Company's needs assessment for LIURP, the Company estimates the number of visits per year for 2014-2016 by dividing the total number of potentially eligible households by 20 and rounding the result to 1,900 visits per year. An additional 655 households are added to the projected enrollment levels as required by settlement in the Company's base rate proceeding at docket number R-00061346. The Company developed the original needs assessment methodology more than 10 years ago in conjunction with BCS staff but agrees recent enrollment has exceeded the forecasted needs assessment. As such, the Company is not

opposed to modifying this methodology and will evaluate the method of determining the projected enrollment levels and include changes in future needs assessment.

Lynda Pekarsky  
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Respectfully Submitted:

A handwritten signature in black ink, appearing to read 'T. Williams', with a long horizontal line extending to the right.

Tishekia E. Williams, Esquire  
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Dated: January 8, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Duquesne Light Company's Comments to the Pennsylvania Public Utility Commission's Tentative Order in Docket No. M-2013-2350946 has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

**FIRST-CLASS MAIL**

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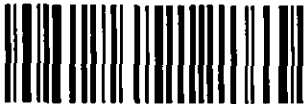

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**UPS CampusShip: View/Print Label**

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed sheet containing the label at the line so that the entire shipping label is visible.** Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**  
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 Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.  
 Hand the package to any UPS driver in your area.  
 Take your package to any location of The UPS Store<sup>®</sup>, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot<sup>®</sup> or Staples<sup>®</sup>) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

**Customers with a Daily Pickup**  
 Your driver will pickup your shipment(s) as usual.

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TISHEKIA WILLIAMS 412-393-1541 DUQUESNE LIGHT 411 SEVENTH AVE PITTSBURGH PA 15219		0.0 LBS LTR	1 OF 1
<b>SHIP TO:</b> SECRETARY ROSEMARY CHIAVETTA PA PUBLIC UTILITY COMMISSION 400 NORTH STREET COMMONWEALTH KEYSTONE BUILDING <b>HARRISBURG PA 17120-0200</b>		<b>PA 171 9-20</b> 	
<b>UPS NEXT DAY AIR</b> TRACKING #: 1Z A5V 029 01 9916 6749		<b>1</b>	
			
BILLING: P/P Cost Center: 006			

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