

ORIGINAL

Decision 82 11 013 NOV 3 1982

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of)
the KYBURZ WATER COMPANY, and FRED)
R. MORLEY and DIANA M. MORLEY dba :)
KYBURZ WATER COMPANY, for an Order)
Authorizing the Sale of Its Water)
System to the Property Owner-Users)
and to Convert to a Mutual Water)
Company in El Dorado County,)
California.)

Application 82-03-14
(Filed March 3, 1982)

James B. Thompson, Attorney at Law, for
Kyburz Water Company, Fred R. Morley and
Diana M. Morley, Kyburz Mutual Water
Company, and proponents of this application.
John C. Weidman, Attorney at Law, for Wm. and
Jeannette Norvelle, Carol Robison et al.,
protestants.
Rudleigh C. Coffman, for himself, protestant.

O P I N I O N

Statement of Facts

In the late 1950 period, as a necessary complement to its development of approximately 80 acres of mountain resort property located below Kyburz Mountain 30 miles from Placerville, Summer Homes, Inc., a California real estate development corporation, contracted to install a water system to serve its development. Making use of two impoundment dams constructed 50 years previously and some installed pipeline, the system was built in accordance with then existing General Order (GO) 103 minimum requirements at a cost of \$57,042.50. Certain other associated expenditures brought total costs up to \$81,123.

Thereafter the developers offered the water system to the lot purchasers who declined the offer to purchase. Then the developers offered the system to Fred R. Morley and his wife Diana M. Morley. The Morleys incorporated as Kyburz Water Company (Kyburz), a California corporation, to acquire the system. By Decision (D.) 42029 dated August 9, 1960, Kyburz was authorized to acquire the water system by issuing 57,000 shares of its common stock (par value \$1 per share) to Summer Homes. Summer Homes then sold the stock to the Morleys for \$10,000 under a purchase agreement. Thereafter Fred Morley, a licensed sanitarian working as a consultant in that field with a licensed contractor, was authorized to operate the public utility system to serve the resort community.

Kyburz obtains its water by diversions into impoundment dams from the east and west branches of the Kyburz Creek.^{1/} At about 4,200 feet elevation the water is then pumped by a 10 HP pump to a reservoir from whence it is distributed by gravity flow through a 6-inch main to the distribution piping in the resort area strung out below along the south fork of the American River and U.S. Highway 50. Some treatment is provided by an antiquated Purex Corporation "package" filtration plant and a BIF hypo-chlorination injector. Fire protection is provided by 10 hydrants although the system's capability is very limited. During high demand periods the only way sufficient water can be delivered to the community has been to bypass the treatment plant entirely.^{2/}

1/ Kyburz operates under a special use permit on U.S. forest lands. It obtained its water rights from a grant of certain water rights made in 1960, together with a license for diversion and use of water issued by the State of California, Department of Public Works, Division of Water Resources (DWR).

2/ The existing treatment plant has a capacity of only 100 gpm.

At present, the system serves 5 metered commercial customers and 87 flat rate residential customers. There are about 57 potential customers depending upon future development of property. Apart from a small core of permanent residents, the majority of property owners are weekend or vacation residents.

For the two decades after 1960 the Morleys operated the water system, using their construction company crews and their equipment to do necessary maintenance work from time to time. Rates for residential service during all this period remained at the same \$72 per year originally established in 1960. During the latter part of this time span, siltation in the system and turbidity began to cause problems and discoloration of the water. The chief cause, as determined by the county health authorities, was attributed to logging operations on the watershed above the system, assertedly operations conducted by Michigan Cal Lumber Company.^{3/} Until 1977 the Morleys operated on successive temporary operating permits from the county Department of Public Health. In 1977 they sought a permanent operating permit. After inspection the county expressed its concern with the siltation and turbidity problem. At first a sedimentation pond was suggested, but the logging company and the Forest Service refused to accept responsibility or provide funds. The county then determined that it would require a new treatment plant, related equipment, and a 100,000-gallon redwood storage tank. Early in 1979 the Morleys started preparation of a California Safe Drinking Water Bond Act (CSDWBA) loan contract application to finance the required improvements, hiring Ray Phillips of Watermaster, Inc., consulting engineers, to prepare the application.

^{3/} Kyburz and the Morleys have pending a lawsuit against the logging company for damages.

Meanwhile, Morley had retired and no longer had the resources of his construction firm to rely upon to perform occasional maintenance or to underwrite losses from operation of the water company. Morley accordingly sought rate relief. A Commission-sponsored informal public meeting was held December 7, 1978 attended by about 30 customers who voiced their complaints about "dirty" water. The utility pointed out its inability either to operate without sufficient revenues in an inflationary period, or to finance needed improvements without a CSDWBA loan. Following the meeting on January 10, 1979 Morley filed Kyburz's Advice Letter 6 for rate relief. By Resolution W-2477 the Commission authorized an increase doubling the residential rate to \$144 a year and designed to provide a 5.7% rate of return but held up the increase until the utility filed a loan application with DWR.

Having been found eligible as of October 26, 1979 by DWR for a \$100,000 CSDWBA loan, Kyburz on December 20, 1979 filed Application (A.)59346 for authorization to enter a 35-year loan contract with DWR and to place into effect a \$12.35 bimonthly surcharge for the purpose of amortizing the loan. In addition, having now met the Commission's conditions, the rate increase authorized by Resolution W-2477 was allowed to become effective on December 26, 1979.

Late in January 1980, a duly noticed public meeting on the CSDWBA loan application was conducted at the Fire Protection District Office in Kyburz. Before the meeting 15 customers wrote to protest the loan, some questioning the need for any loan and blaming the situation upon the Morleys, some expressing distrust of the Morleys, and still others contending that parttime residents should not have to pay for year-round service. All complained about the water. At the meeting, attended by about 35 customers and representatives of

the Commission, Water Resources, the county, and the consulting firm, after 3½ hours and a concluding talk by the consulting engineer, the majority of those present reluctantly evidenced their acquiescence in the loan project.

However, within days thereafter 70 to 80 members of the community had a further meeting, with the result a public consensus that it would be to the better interest of the community to attempt to purchase the water system themselves and convert it to a mutual operation. To forestall any further steps by the Morleys to obtain Commission approval for a loan in the interim, owners representing approximately 90 of 135 lots signed a petition rejecting the loan proposal as presented at the January 30 meeting and indicated their preference for a mutual operation. The group also designated one of their number, James B. Thompson (Thompson), a practicing attorney, to represent them. (In rebuttal, seven lot owners signed another petition favoring the loan as initially proposed.)

The group, organized as the Kyburz Property Owners Association (Property Owners) after a series of meetings authorized Thompson to negotiate a sale of the utility. After their initial \$40,000 offer was rejected, Morley's counteroffer of \$100,000 was accepted and an option to purchase was acquired. The Property Owners then began the task of assembling the massive paperwork to accompany an application to the Corporations Commissioner to organize a mutual and obtain authority to offer and sell shares. Meanwhile, because of the pending expiration of the commitment from DWR of CSDWBA funds for Kyburz, Morley worked to obtain extensions. DWR further agreed that in the event the Property Owners were successful in exercising their option, the mutual could succeed Kyburz in all aspects of the application process.

On August 11, 1981 the Corporations Commissioner issued a permit to allow subscriptions to purchase shares in the Kyburz Mutual Water Company (the Mutual). A prospectus was sent to the lot holders in the Kyburz service area seeking subscriptions to purchase one share of the Mutual for each lot at a cost per subscription of \$1,000.^{4/} It was stated that if 100 subscriptions could be obtained the Property Owners would exercise its option, and on order of the Corporations Commissioner the subscribed funds to the amount of \$100,000 (to be held on deposit in the River City Bank in Placerville) would be paid to the Morleys for their Kyburz stock. Simultaneously, amended articles of incorporation would be filed with the Corporations Commissioner, converting Kyburz to a mutual water company. The proceeds of any subscriptions beyond the first 100 would be used for working capital, repairs or improvements, or to retire loans. However, after the initial subscription period, a lot owner not presently using water who did not subscribe but might later want water would be required at that future time to purchase a Mutual share at the price then set by the Mutual. There would be no water service except to Mutual shareholders. It was also determined that it would not be practical or feasible to apply to the Commission for authority to complete the sale and conversion, or to apply to DWR for a recommitment on the CSDWBA loan, until it was evident that \$100,000 could be raised by subscriptions.

By March 1982, 99 lot owners had subscribed \$1,000 each, and further subscriptions were expected. Accordingly, the Morleys, assisted by Thompson for the Property Owners, filed this application seeking an ex parte order of the Commission authorizing sale of the system to the Property Owners, concurrent authorization

^{4/} The shares of the Mutual would become and remain appurtenant to such lots.

to convert Kyburz to a mutual, and relief for the Morleys from their public utility responsibilities.

In October 1981, an attorney representing William and Jeannette Norvelle (the Norvelles), Kyburz customers and lot owners and leaders of a dissident group, had written the Commission to ask that upon the filing of any application for transfer or sale of Kyburz, a public hearing be set. Subsequently, after filing of the application, the Norvelles through their attorney filed a timely formal protest and request for a public hearing. Concurrently, Carol Robison wrote, enclosing a petition purportedly evidencing the request of 19 lot owners (including the Norvelles) for a public hearing on the application. Rudleigh Coffman, another lot owner, wrote to plead the special circumstances of 11 lot owners on the southern border of the subdivision whose ownership has been adversely affected by an inaccurate surveyor's map leaving much of their property a part of Eldorado National Forest. Pending federal legislation could reestablish their lots and Coffman asked that there be a requirement in any Commission order holding the subscription right and price for a reasonable time to allow clearance of their titles.

A duly noticed public hearing, attended by approximately 55 lot owners, was held July 9, 1982 in Sacramento, California, before Administrative Law Judge John B. Weiss.

At this hearing, applicants' attorney Thompson introduced a six-page statement (Exhibit 1) which was characterized as being prepared introductory testimony of witnesses Morley and Ed Nafus.^{5/} This statement described the service area, facilities, and operations of the water system, and set forth the background of the proposed sale and conversion and the plans of the

^{5/} Nafus is the owner of the Kyburz Lodge and the restaurant and is chairman of the Property Owners and Mutual director-designate.

proponents. Morley then testified, further enlarging on the statement, and presented evidence that his engineering consultant considered the \$100,000 state loan to still be adequate to rehabilitate the system. Morley clarified details on the CSDWBA loan and affirmed that the owner of the Tahoe Paradise Water Company had also expressed possible interest in the system. Nafus testified of his role in the developments which led to formation of Property Owners and events since. He stressed that the Mutual plans to make maximum use of volunteers to hold down costs and that the five Property Owners, who are designated to be officers of the Mutual and its Board of Directors, expect to serve without compensation. On cross-examination Nafus explained why the Property Owners offered \$100,000 for the system and described what water rights the Mutual will acquire. He also made it clear that there will be no service except to Mutual shareholders even though the original recorded Tract Restrictions on residential lots prohibit individual wells. On summation the proponents stressed that the improvements are absolutely necessary and will cost money whether put in by a mutual or a utility. They took this action because they felt they could do a better job themselves and more cheaply than relying upon absentee owners, whether the Morleys or others. They believe they can take care of themselves, selecting reasonably prudent people to manage their own affairs; and that obviously the majority agree - over 80% have backed the plan with cash; only 18 of 152 have objected.

On behalf of the protestants, attorney Weidman produced evidence that there are 92 improved lots and 54 unimproved lots; of these former, 78 owners, and of the latter, 22 owners, have subscribed. Out of 25 fulltime residents 19 have subscribed. A subpoenaed

El Dorado County health sanitarian testified that private wells cannot provide an alternative to those not wanting a mutual. Today one needs 4½ acres to have both a septic tank and well; and since there is no sewer system, wells are effectively precluded. Protestant Robison, owner of an unimproved lot, testified that all owners had not been notified of the meetings which led to organization of the Mutual; that volunteer work would be unfair if all did not participate; that lots without water service would be unsalable, and that she objected to the indicated composition of the Mutual's Board of Directors. She was concerned over a mutual's liability; felt that the charge for mutual shares is unfair to earlier lot purchasers; wanted Public Utilities Commission (PUC) jurisdiction, and believed that her aged mother (owner of an adjacent improved lot) had been given erroneous information, and had subscribed under duress. On cross-examination she admitted she received the prospectus and could point to no false information in it. She also admitted that she had attended none of the meetings and had not called any of the five prospective Mutual Board members listed in the prospectus to get answers to her concerns. She also had been unaware that lot owner Joseph Butte had made a standing offer to loan any fellow lot owner the \$1,000 subscription money on very favorable terms. (Butte repeated his offer at the hearing.) Protestant Jeannette Norvelle testified of her involvement and opposition to a mutual. Matthew Zachery and Marilyn Johnson testified to complain of lack of notification of the organizational meetings for the Mutual but admitted getting the prospectus. (Zachery subscribed.) Herbert Dallas testified to complain of lack of notice also, but got the prospectus. On cross-examination he admitted going to one meeting but said he had no confidence in the controlling

faction and would be against a mutual regardless of notice. On summation the protestants argued that the Morleys ran a satisfactory service and that they would be willing to pay for improvements required but that the Morleys should continue operations under the PUC, or sell to someone of proven capability for \$50,000 who would operate under Commission jurisdiction. They objected to the two-year delay in the state loan, blaming it on the organization of the Mutual. They object to the lack of any alternative to joining the Mutual if it goes through and fear the potential for tyranny by the majority.

Protestant Coffman limited his participation to reiterating the special circumstances of the 11 southern tier Property Owners and to ask that the share subscription time be kept open pending congressional resolution of their problem. He favors the Mutual.

Apart from the formal presentation of testimony and evidence at the hearing, owners representing 20 lot interests made statements for and against the application. The interests represented were evenly split, 10 for and 10 against. Another lot owner of a developed lot wrote to state she had subscribed and favored conversion to a mutual.

At conclusion of the hearing, the matter was submitted for decision.

Discussion

It has long been accepted that an individual can acquire water to be used on his own land. And with such a right existing in the individual, it is well-settled that there can be no objection in law to a number of individuals associating themselves to acquire corporate form and obtain water to be used on their own lands (Mcfadden v County of Los Angeles (1888) 74 C 571). The principle is predicated on the theory that the water itself being owned by

the several individuals, the corporation formed by them became simply their agent for the purpose of more conveniently diverting and distributing the water among themselves. And since they are to be the only contributors to the corporate funds, the only owners of the property, and the only persons to receive the benefits and share the burdens of the system, they should be the logical judges of the management and control of the company and the only proper persons to determine the rates they should pay to maintain and operate the system. Upon this theory, the courts and the Legislature have declared, in effect, that, the general public having no interest in the service and rates of such organizations, this Commission possesses no jurisdictions over them. (See Public Utilities Code Section 2705.)

In the instant situation, faced with the prospect of assuming a substantial surcharge for the next 35 years to pay off a prospective state loan to be used to rehabilitate their public utility water system, after vacillation at a lengthy evening meeting the Kyburz customers reluctantly acquiesced. But then, the morning after, they had second thoughts.

For the past several decades they had been the recipients of public utility service from a small water company owned by absentee proprietors. In recent years the service had been steadily deteriorating. As a number of letters to the Commission in the 1980 CSDWBA loan application matter (A.59346) graphically pointed out, the water was muddy, causing some customers gastric problems. Indeed, the quality was so poor that a number felt compelled to purchase bottled water for drinking and cooking. Many blamed the situation upon absentee ownership.

Accordingly, feeling that a change was called for and believing that they could do things better on their own without public

utility regulation, a substantial majority of the lot owners, residents and weekenders, determined that they wanted to take over the system and run it for themselves. Organized as the Property Owners, and having ascertained that a CSDWBA loan would still be available to them, they put up funds and set into motion the procedures necessary under California's Non-Profit Mutual Benefit Corporations Law (Sections 7110 et seq., Corporations Code) to legally form a mutual water company. They then proceeded to back up their decision by obtaining 100 individual subscriptions of \$1,000 each to form a fund to buy out the Morleys.

It is not the business of this Commission to second-guess the merits or wisdom of that decision. Generally speaking, any property owner should be allowed to sell his property, and anyone to buy it, unless it would be detrimental to the public. But a water company is somewhat different. Once a water company has undertaken the rendition of public utility service, it cannot discontinue such service, or any part of it, at will, but is under a duty to continue service until it has sought and obtained relief from that obligation by an order of the Commission (Western Canal v Railroad Commission (1932) 216 C 639, 647, cert. denied (1933) 289 US 742). In addition, a public utility seeking to be relieved of all or a part of a service obligation has a burden of affirmatively showing to the Commission that discontinuance of that obligation would not be against the public interest. As used here, by public interest we mean the welfare of the entire community - the common interest of all the Kyburz water consumer community in having its water diversion, treatment, and distribution facilities set up under whichever organizational format can most efficiently, reasonably, and equitably provide the best service to meet the requirements of this resort community.

Here the present owners are retired now and tired of the responsibility of the operation. They live 30 miles away in Placerville and must rely upon parttime help to operate the system. They no longer have available construction firm crews and equipment from Mr. Morley's former business. They are tired of coping with government for loans, rate increases, and permits. They want to get their money out of what has turned out to be an unprofitable investment.

On the other hand, the prospective transferees as represented by the Property Owners either live full or part time at Kyburz or own property there. They must have water. All have a strong and continuing personal interest in the availability of good water. By the action taken by 100 of them in investing \$1,000 each to purchase shares in the Mutual, they have let actions speak louder than words. One of their group has publicly offered to loan funds on very reasonable terms to any lot owner who lacks the immediate cash to purchase a Mutual share.^{6/} Some have devoted long hours, effort, and considerable personal funds to this venture and are prepared to continue to do so. Some have participated in operation of the utility in the past and are well-acquainted with the system. They have obtained the services of well-qualified technical advisors

^{6/} See Exhibit 8 to this proceeding wherein property owner Joseph Butte made a written offer to make available \$1,000 loans to up to 16 individual lot owners if a hardship exists to enable them to purchase mutual share certificates.

and have obtained assurance of the availability of a state loan to rehabilitate the system.^{7/}

In situations involving as many individuals as are involved here, consensus is rarely available. This application has been strongly protested. But the underlying thrust of the opposition appears to be rooted not in objective grounds, but rather in personalities. As the attorney for the protestants so aptly stated in writing the Commission:

"The Norvelles believe that there is a tremendous personality conflict between the proponents of the Mutual Water Company and those opposing them.

"The Norvelles believe that the Mutual Water Company, under such circumstances, cannot be fairly and impartially managed to guarantee fair and equitable service to those property owners who oppose the present application, should the same be approved."

Similarly, Mr. Dallas, another protestant, both in his testimony and in his letter to the Commission stated:

"We do not have confidence in the structure or controlling faction that would administer."

Fears were expressed by the protestants that there would be no opportunity to have a voice in matters. But this overlooks the fact that a mutual by law must be the joint instrumentality of its shareholders, and that each shareholder has a legal right to a voice in

^{7/} However, because of both opposition from some lot owners, and the lengthy requirements and procedures for such loans, the formal approval by DWR has been repeatedly delayed. As noted earlier, Commission approval of Morley's A.59346 (seeking Commission authorization to borrow \$100,000) has been held. Approval of this application would serve to render A.59345 moot since the Commission has no jurisdiction over mutuals. However, further delay in authorizing sale and conversion to a mutual will cause DWR to require full reapplication for a CSDWBA loan and refunds of the \$100,000 held in trust to purchase the Morley stock.

the management of the Mutual and in the selection of those who will manage or control the Mutual. There has been no indication in this proceeding that each shareholder would be anything less than a bona fide shareholder free to exercise his voice, or unable to enforce his legal rights. Judicial remedies are readily available to any individual shareholder deprived of his rights. These judicial remedies are adequate substitution for utility regulation. They can be used to correct wrongs as well as to obtain damages. The Bylaws of the Mutual provide for democratic procedures. No more can be required. Certainly as long as they are not contrary to the public interest, the wishes of a substantial majority of fellow consumers cannot be thwarted by a small number of dissidents, however lofty the motives of the latter.

Therefore, where the prospective transferees represent not only the substantial majority of lot owners, but are composed of responsible individuals representing both full- and parttime residents as well as owners of unimproved property, and have not only the financial resources to purchase the system but also the responsibility to be able to acquire a state loan to rehabilitate the system, and also the desire and civic interest to promote the welfare of the resort community and to contract to acquire the existing system and render immediate service pending rehabilitation, in our opinion it would be to the public interest to authorize the requested sale and transfer. (See El Pismo Water Company (W.W. Ward) (1926) 27 CRC 560.)

Unfortunately, there is little more that we can do to assist Coffman and the other ten lot holders on the southern tier of the resort community. Until Congress chooses to act on their personal interest bills, these property owners won't know if they own viable lots or merely fragments. We are assured by the

attorney for the Mutual, himself a Board member designate, that their special problem will be given full consideration, provided a resolution of the survey problem can be reached within a reasonable time.^{8/}

One final item remains. Kyburz has a lawsuit pending against a lumber company for damages to the watershed. Should the suit continue past the effective date of transfer of the system to the Mutual, the parties have agreed to split both the costs and any proceeds, 30% to the Morleys, and 70% to the Mutual. We find no objection to this agreement.

Findings of Fact

1. Kyburz, whose stock is wholly owned by the Morleys, is a public utility water company under the jurisdiction of this Commission.

2. The Kyburz water system requires extensive repairs as well as additional water storage and treatment facilities, all estimated to cost \$100,000.

3. After lengthy endeavors the Morleys were successful in obtaining from DWR a commitment for a CSDWBA loan of \$100,000 to rehabilitate the system. An application for Commission approval of this loan is pending (A.59346 dated December 20, 1979).

4. Approval of this application would render A.59346 moot since this Commission lacks jurisdiction over mutual water companies, and its approval is not required for a CSDWBA loan to a mutual.

5. The Morleys wish to sell the Kyburz stock to the property owners of the community of Kyburz, and in conjunction with those property owners to restructure Kyburz to become Kyburz Mutual Water Company, a mutual to be established under California Non-Profit Mutual Benefit Corporations Law by a committee representing the property owners.

^{8/} Their special interest bills have cleared the House of Representatives but remain tied up in the Senate in sub-committees.

6. The 57,000 shares of Kyburz stock owned by the Morleys would be converted to 100 shares with the negotiated sale price to be \$100,000, or \$1,000 a share.

7. The Kyburz articles of incorporation would be amended, converting the water public utility to a mutual water company, new bylaws would be adopted, current Kyburz directors and officers would resign, and a new board of directors would be appointed. The Morleys would then withdraw entirely.

8. The committee of property owners obtained authorization from the California Corporations Commissioner to offer shares in the Mutual through a trust arrangement to individual lot owner consumers of the Kyburz community on the basis of one share per lot (that share to be appurtenant to the lot for which it is issued); the proceeds of the subscription are to be used to purchase Morley's shares in Kyburz.

9. Property owners representing 104 lots subscribed for share certificates in the Mutual, depositing \$1,000 in trust for each share. Subsequently, four lot owners withdrew.

10. DWR will transfer the CSDWBA loan commitment of \$100,000 to the Mutual, provided the Mutual can be formed expeditiously.

11. The opposition of a small group of property owners representing approximately 18 lots out of 149 appears to be substantially based upon factional personality grounds.

12. It is in the public interest to authorize sale of the Kyburz stock and conversion of the system to a mutual basis.

Conclusions of Law

1. The sale of the Kyburz water system, owned and operated by the Morleys, to the property owner-users, and conversion to a mutual water company should be authorized.

2. Upon completion of the sale and conversion, the Morleys and Kyburz should be relieved of any public utility obligation to the transferred system.

3. To expedite the transfer of the water system, this order should be effective on the date it is signed.

4. By separate order, A.59346 should be dismissed as moot.

O R D E R

IT IS ORDERED that:

1. On or before February 28, 1983, Fred R. Morley and Diana M. Morley, doing business as Kyburz Water Company, and Kyburz Water Company, may sell the water system and its assets referred to in the application to the property owner-users, and convert the system and operation to a mutual water system to be known as the Kyburz Mutual Water Company, according to the terms and conditions in the application.

2. Within 10 days after the sale and conversion the Morleys and Kyburz Water Company shall write the Commission stating date of sale and conversion and date when the Mutual began operating the system. A copy of the transfer documents, if such documents are executed, shall be attached.

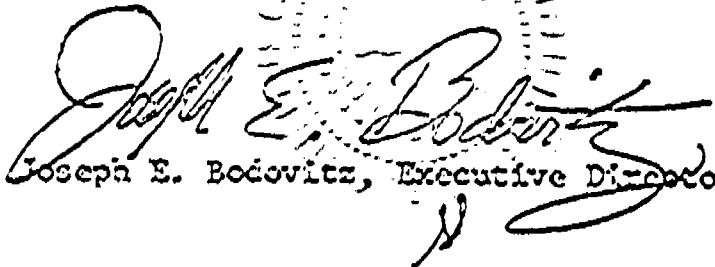
3. Upon compliance with this order Fred R. Morley and Diana M. Morley, doing business as Kyburz Water Company, and Kyburz Water Company, shall be relieved of their public utility obligation for the transferred system.

This order is effective today.

Dated NOV 3 1982, at San Francisco, California.

JOHN E. BRYSON
President
RICHARD D. GRAVELLE
LEONARD M. GRIMES, JR.
VICTOR CALVO
PRISCILLA C. CREW
Commissioners

I CERTIFY THAT THIS DECISION
WAS APPROVED BY THE ABOVE
COMMISSIONERS TODAY.


Joseph E. Bodovitz, Executive Director