PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION G-3262 OCTOBER 21, 1999

<u>RESOLUTION</u>

RESOLUTION G-3262, SOUTHERN CALIFORNIA GAS COMPANY. APPROVES AUTHORIZATION TO REVISE SCHEDULE NO. G-ITC BY ELIMINATING ALL REFERENCES TO THE INTERCONNECT CHARGE MEMORANDUM ACCOUNT (ICMA) SURCHARGE. APPROVES THE CREATION OF A NEW TARIFF SCHEDULE, SCHEDULE NO. G-ICMA. APPROVES THE EXTENSION OF THE ICMA SURCHARGE TO RECOVER A FERC-ORDERED REFUND. APPROVES THE TRUNCATION OF THE ICMA SURCHARGE TO THREE DECIMAL PLACES.

BY ADVICE LETTER 2820, FILED ON JUNE 30, 1999, AND 2820-A, FILED ON AUGUST 31, 1999.



<u>SUMMARY</u>

By Advice Letter (A.L.) 2820, filed June 30,1999, Southern California Gas Company (SoCalGas) submits for filing and approval with the Commission a request to revise Schedule No. G-ITC. SoCalGas' proposal seeks to accomplish three things:

- It would remove all references to the Interconnect Charge Memorandum Account (ICMA) Surcharge from Schedule No. G-ITC.
- It would create a new tariff, Schedule No. G-ICMA, dedicated solely to the ICMA Surcharge. SoCalGas requests that this new tariff become effective on September 1, 1999.
- It would continue the current ICMA Surcharge rate of 0.1247¢ per therm until a FERCordered refund of \$1.627 million is recovered.

By A.L. 2820-A, filed August 31,1999, SoCalGas notified the Commission that its billing system truncated the current rate of 0.1247¢ per therm to three decimal places, resulting in a billed rate of 0.124¢ per therm. SoCalGas seeks approval to change its ICMA Surcharge rate to reflect this truncated number.

The Energy Division received no protests to either A.L. 2820 or 2820-A.

This Resolution approves A.L. 2820 and 2820-A.





BACKGROUND

SoCalGas filed A.L. 2820 on June 30, 1999, proposing to remove all references to the ICMA Surcharge from Schedule No. G-ITC. Instead of being a part of the G-ITC tariff, SoCalGas proposes to create a new tariff, Schedule No. G-ICMA, that would only contain the ICMA Surcharge. Before discussing the background of this tariff bifurcation, it is necessary to discuss the creation of the ICMA Surcharge.

The history of the ICMA dates back to 1993. In Decision (D.)93-02-055 and D.93-05-009, the Commission approved the interconnection of the Kern/Mojave and PG&B Expansion Project pipelines with SoCalGas' pipeline system. The Commission found that the costs of additions and improvements to SoCalGas' system should be recovered from those who used the interconnection, not from all ratepayers in general. SoCalGas was ordered to institute a surcharge that would be levied on shippers moving gas through the interconnect.

On May 7, 1993, SoCalGas filed A.L. 2176 requesting approval of an "Interconnect Access Service" charge. The charge was to be applicable to natural gas transportation deliveries nominated by shippers into SoCalGas' intrastate system at the Wheeler Ridge and Kern River Station points of receipt.

The Commission received a number of protests to A.L. 2176. Resolution G-3072 ördered modifications that were suggested in the protests and agreed to by SoCalGas. The Resolution became effective on July 8, 1993; SoCalGas established Schedule G-ITC and began to charge for the service at Wheeler Ridge on July 13, 1993.

Several parties applied for rehearing of Resolution G-3072. As a result of that application, the Commission issued D.94-01-048, which found that the tariff (G-ITC) containing the Interconnection Access Service charge conflicted with previous decisions. That tariff was annulled, but SoCalGas was allowed to file a new tariff that was in accord with the principles set forth in D.94-01-048. SoCalGas was ordered to refund all the Interconnection Access Service charges it had collected under its defective tariff. However, SoCalGas was ordered to continue tracking charges that would have been assessed under Schedule G-ITC in a memorandum account until such time that a new tariff could be put in place.

In compliance with Ordering Paragraph No. 3 of D.94-01-048 (which authorized SoCalGas to continue to track, in a memorandum account, those charges previously assessable under the original G-ITC), SoCalGas filed A.L. 2279. That advice letter established the Interconnect Charge Memorandum Account (ICMA). Permissible additions to the ICMA included revenues collected under the old Schedule G-ITC (prior to its annulment) that were scheduled for refund, as well as interconnect charges that would have been assessed end-use customers for the period between the end of the old G-ITC and the start of the new G-ITC. A new revised Schedule G-ITC became effective on April 13, 1994 by A.L. 2284-A.

Shortly after D.94-01-048 was issued, the Executive Director extended the time for compliance with the refund provisions of the decision. Prior to the time the decision became final, the

2

8

Division of Ratepayer Advocates (DRA) filed a petition for modification, requesting an emergency stay of the refund provision. In D.94-04-087, the emergency stay was granted until such time as an order was issued disposing of DRA's petition.

The Commission disposed of DRA's petition in D.94-09-038. Further hearings were ordered on the use of the interconnect facilities; the stay order on the refunds was continued until a new decision was issued.

The Commission issued D.95-04-078 in Phase II of SoCalGas' 1993 Biennial Cost Allocation Proceeding (BCAP). That decision addressed the charges SoCalGas would have collected from the interconnect customers during the period of January 1, 1994 to April 13, 1994 had a G-ITC tariff been in place. That time period represented the interval between the cancellation of the original G-ITC tariff (December 31, 1993) and the implementation of the new G-ITC (April 13, 1994). The decision noted that the shortfall over that period amounted to \$2.527 million. In Appendix A of that decision, an ICMA Surcharge of 0.0270¢ per therm was found reasonable.

In A.L. 2410, SoCalGas sought to modify its Schedule G-ITC by adding an Interconnect Charge Memorandum Account (ICMA) Surcharge to recover the \$2.527 million that would have been assessed during the January 1, 1994 through April 13, 1994 period. Pursuant to D.95-04-078, an ICMA Surcharge of 0.0270¢ per therm was proposed. That A.L. became effective on May 1, 1995.

The Commission issued D.95-07-012 in Phase III of SoCalGas' 1993 BCAP. That decision reexamined the refund (of the charges SoCalGas received while the first Schedule G-ITC was in effect) ordered by D.94-01-048. In Conclusion of Law (Conclusion) No. 4, D.95-07-012 found that the tariff approved by Resolution G-3072 (which set up the initial G-ITC) was valid. In Conclusion No. 5, the decision found that the Commission was in error in annulling G-3072. In Conclusion No.6, it found that D.94-01-048 should be rescinded and that the refund order should be annulled.

D.95-07-012 had no impact on either the ICMA balance or the ICMA Surcharge. Since the initial refund order (of the amounts received by SoCalGas while the initial Schedule G-ITC had been in effect) had been stayed, no refunds had actually taken place. Therefore, those dollars had never been included in the ICMA. Similarly, the ICMA Surcharge of 0.0270¢ per therm was designed to recover only those charges that were lost during the period from the end of the first Schedule G-ITC to the start of the second G-ITC; it had never been designed to recover any potential refunds from the first G-ITC.

Following the issuance of D.95-07-012, there ensued a long series of hearings, orders, and lawsuits involving the Commission, FERC, and various courts. The culmination of this process was an order by FERC on November 2, 1998 that required SoCalGas to provide refunds to interstate shippers for the period between July 13, 1993 and December 31, 1993, the period that the first Schedule G-ITC was operating.



Pursuant to the FERC order, SoCalGas refunded \$1,890 million to upstream interstate shippers. That amount was therefore added to the ICMA balance. In A.L. 2763 (filed November 20, 1998), SoCalGas sought to revise the ICMA Surcharge rate so that the ICMA balance would be recovered in approximately six months.

In Resolution G-3254, the Commission approved SoCalGas' A.L. 2763. The ICMA Surcharge was raised to 0.1247¢ per therm. The Resolution became effective on May 13, 1999, with the revised rate commencing on June 1, 1999. It was estimated that the ICMA balance would be fully amortized in approximately six months.

The \$1.890 million refund discussed above was made only to those shippers who were not also end-use customers. The Southern California Utility Power Pool and Imperial Irrigation District (SCUPP/IID), whose members were both interstate shippers and end-use customers, protested the refund before FERC. They successfully argued that since the interconnection charge was found by FERC to be invalid in its entirety, SoCalGas should be ordered to refund the charges to all interstate shippers, regardless of whether or not those shippers were also end-use customers of SoCalGas.

On June 1, 1999, FERC issued an Order of Refund Report. This Order directed SoCalGas to issue further refunds to interstate shippers such as SCUPP/IID who paid the interconnection charge and were also SoCalGas end-use customers during the period of July 13, 1993 through December 31, 1993 (the period of the original Schedule G-ITC). Pursuant to this FERC Order, SoCalGas has issued additional refunds, amounting to \$1.627 million, including interest. SoCalGas has recorded this amount into the ICMA.

In this A.L., SoCalGas proposes to extend the current 0.1247¢ per therm ICMA rate (which, in A.L. 2820-A, it proposes to modify to 0.124¢ per therm) until the balance is fully amortized. In Resolution G-3254, it was estimated that the 0.1247¢ per therm rate would be needed for approximately six months. With the addition of a second refund, amounting to \$1.627 million, either the existing surcharge would need to be extended beyond the six-month period anticipated in Resolution G-3254, or the existing rate would need to be increased. Rather than increasing the existing rate simply to meet the six-month amortization period, SoCalGas proposes that the current ICMA Surcharge remain in effect until the ICMA balance is recovered.

As mentioned in the first paragraph of this section, this A.L. also seeks to remove the ICMA Surcharge from the G-ITC schedule. SoCalGas seeks to bifurcate the G-ITC schedule, with the result being that the ICMA Surcharge would be contained in a new tariff, Schedule No. G-ICMA.

SoCalGas' rationale for proposing this bifurcation of its G-ITC tariff stems from a proposal it has made in its 1999 BCAP (A.98-10-012). As discussed previously, in its current formulation, the G-ITC schedule consists of two parts. The first part consists of the volumetric rates whereby the users of the Wheeler Ridge interconnect pay for the costs of the facilities; the second part is the ICMA Surcharge. In its BCAP, SoCalGas has submitted a proposal whereby the Wheeler Ridge rates (the first part of Schedule G-ITC) would be eliminated; instead of charging a rate for







volumes of gas delivered through the interconnect facilities, SoCalGas would provide rolled-in ratemaking treatment.

If SoCalGas' proposal were to be adopted in the BCAP proceeding, the only meaningful portion of Schedule G-ITC that would remain would be the second part, the ICMA Surcharge. To avoid that confusing possibility, SoCalGas is seeking to give the ICMA Surcharge its own tariff.

On August 31, 1999, SoCalGas filed A.L. 2820-A. In that filing, SoCalGas notified the Commission that its billing system truncates the current ICMA Surcharge rate of 0.1247¢ per therm to three decimal places, resulting in a billed rate of 0.124¢ per therm. SoCalGas has concluded that changing its billing system to recognize four decimal places would not be cost effective. Therefore, SoCalGas is proposing that the last digit of the ICMA Surcharge rate be dropped, resulting in a new authorized rate of 0.124¢ per therm.

NOTICE

Advice Letters 2820 and 2820-A were served on other utilities, government agencies, and to all interested parties who requested such notification, in accordance with the requirements of General Order 96-A. Public notice of these filing has been made by publication in the Commission's calendar.

PROTESTS

The Energy Division received no protests to either A.L. 2820 or 2820-A.

DISCUSSION

The Energy Division has reviewed Advice Letter 2820 and 2820-A, and has been in contact with representatives of SoCalGas.

To facilitate the understanding of the issues in A.L. 2820, it is helpful to describe both the rate schedule and the memo account that are at the heart of the discussion.

The rate schedule in question is Schedule G-ITC, the Wheeler Ridge Interconnect Access Service schedule. As discussed in greater detail in the "Background" section, the Commission has found that the customers who use the Wheeler Ridge interconnect should be the customers who pay for it. To that end, Schedule G-ITC was initially set up on July 13, 1993; users of the interconnect are charged various fees in order to pay for the facilities.

The memo account in question is the ICMA. As described below, there were two periods of time during which SoCalGas was unable to receive interconnect charges for Wheeler Ridge. The ICMA was created to track that lost revenue. In order to recover the lost revenue, an ICMA



Surcharge was added to Schedule G-ITC; once the memo account reaches zero, the surcharge would be discontinued.

The original G-ITC became effective on July 13, 1993 and ran through December 31, 1993 before being terminated by D.94-01-048. That decision also ordered that the charges that had been collected during that initial time period should be refunded. A second Schedule G-ITC went into effect on April 13, 1994. Therefore, SoCalGas lost Wheeler Ridge interconnect charges for two consecutive periods – the July 13, 1993 through December 31, 1993 period of the first G-ITC (which SoCalGas' was ordered to refund), and the January 1, 1994 to April 13, 1994 period (during which no Schedule G-ITC was in place).

The lost revenue for these two periods was tracked in the ICMA, which was established by A.L. 2279 pursuant to D.94-01-048. A description of this memo account was included in Part VI of SoCalGas' Preliminary Statement. That description clearly states that the ICMA should include the total charges that would have been assessed under Schedule G-ITC between July 13, 1993 (the original effective date) and the effective date of the revised G-ITC.

Because the refund order for the initial G-ITC period was stayed, those dollars were not initially included in the ICMA. However, based on the way the memo account is described in the Preliminary Statement, it is clear that the Commission intended the ICMA to include the initial G-ITC dollars if and when the refund ever took place.

On November 2, 1998, FERC finally ordered SoCalGas to refund dollars that SoCalGas had received during the initial G-ITC period. In Resolution G-3254, the Commission approved the inclusion of \$1.890 million into the ICMA balance. The Commission also approved increasing the ICMA Surcharge rate to 0.1247¢ per therm, so that the balance could be amortized in approximately six months.

This initial refund was made to those Wheeler Ridge interstate shippers who were <u>not</u> also enduse customers. Those interstate shippers who <u>were</u> also end-use customers protested the refund. On June 1, 1999, FERC issued an Order of Refund Report. This Order directed SoCalGas to issue further refunds to interstate shippers such as SCUPP/IID who paid the interconnection charge and were also SoCalGas end-use customers during the period of July 13, 1993 through December 31, 1993 (the period of the original Schedule G-ITC). Pursuant to this FERC Order, SoCalGas has issued a second round of refunds, amounting to \$1.627 million, including interest. SoCalGas has recorded this amount into the ICMA.

This inclusion of the second refund in the ICMA is nothing more than a continuation of the process that the Commission approved in Resolution G-3254; SoCalGas' inclusion of the second FERC-ordered refund in the ICMA is proper. The only real issue regarding this refund is whether we should adhere to the approximate six-month amortization period that was adopted in that resolution. Due to the fact that the ICMA balance has now been increased by \$1.627 million, the previously approved six-month amortization period can not be met unless the surcharge rate is increased. We agree with SoCalGas that the best course of action is to maintain the current ICMA Surcharge rate; it should remain in effect until the ICMA balance is



completely amortized. This will certainly mean that the amortization period will extend beyond the six-month period originally approved in Resolution G-3242. However, we believe that this is preferable to a second increase in the ICMA Surcharge rate, especially since the first increase took effect rather recently (on June 1).

In addition to the ICMA Surcharge extension issue, Á.L. 2820 also seeks to bifurcate the existing G-ITC schedule. SoCalGas' rationale for proposing this bifurcation of its G-ITC tariff stems from a proposal it has made in its 1999 BCAP (A.98-10-012). As discussed previously, in its current formulation, the G-ITC schedule consists of two parts. The first part consists of the volumetric rates whereby the users of the Wheeler Ridge interconnect pay for the costs of the facilities; the second part is the ICMA Surcharge. In its BCAP, SoCalGas has submitted a proposal whereby the Wheeler Ridge rates (the first part of Schedule G-ITC) would be eliminated; instead of charging a rate for volumes of gas delivered through the interconnect facilities, SoCalGas would provide rolled-in ratemaking treatment.

If the BCAP decision should adopt SoCalGas' proposal, the only meaningful portion of Schedule G-ITC that would remain would be the ICMA Surcharge. Administratively, that would be awkward and confusing. SoCalGas' proposal to place the ICMA Surcharge in its own tariff would eliminate this potential for confusion.

Initially, we were concerned that this proposed bifurcation could be construed as giving SoCalGas tacit approval for its Wheeler Ridge BCAP proposal; it does not. Nothing in the A.L. would impact the BCAP decision.

SoCalGas' proposal to place the ICMA Surcharge in its own tariff is reasonable. If SoCalGas' Wheeler Ridge BCAP proposal is adopted, future ratepayer confusion will be avoided. If the BCAP proposal is not adopted, then the two schedules (Schedule No. G-ITC and the new Schedule No. G-ICMA) will continue in effect; no further changes to either schedule would be necessary at that time.

The issues in A.L. 2820-A are not as complex as the issues in A.L. 2820. SoCalGas discovered that its billing system is not capable of recognizing an ICMA Surcharge rate that contains four decimal places. Instead, the system truncates the rate to three decimal places, resulting in a rate of 0.124¢ per therm (instead of the previously authorized rate of 0.1247¢ per therm). SoCalGas has concluded that it is not cost effective to change its billing system to recognize the fourth decimal place; instead, it proposes that the last digit of the ICMA Surcharge rate be dropped, resulting in a new (slightly lower) rate of 0.124¢ per therm.

SoCalGas' proposal to use the truncated ICMA Surcharge rate of 0.124¢ per therm is reasonable. By dropping the last decimal place, those who use Wheeler Ridge will enjoy rates that are slightly lower.

7



<u>COMMENTS</u>

This is an uncontested matter in which the Resolution grants the relief requested. Accordingly, pursuant to PU Code Section 311(g)(2), the otherwise applicable 30-day period for public review and comment is being waved.

<u>FINDINGS</u>

1. By Advice Letter 2820, SoCalGas requests authorization to:

- remove all references to the Interconnect Charge Memorandum Account (ICMA) Surcharge from Schedule No. G-ITC.
- create a new tariff, Schedule No. G-ICMA, dedicated solely to the ICMA Surcharge. SoCalGas requests that this new tariff become effective on September 1, 1999.
- continue the current ICMA Surcharge rate of 0.1247 cents per therm until a FERCordered refund of \$1.627 million is recovered.

2. By Advice Letter 2820-A, SoCalGas requests authorization to drop the fourth decimal place of its ICMA Surcharge rate, resulting in a new (slightly lower) rate of 0.124¢ per therm. SoCalGas requests that the effective date of this revision be November 1, 1999.

3. Schedule G-ITC was authorized by Resolution G-3072 and became effective July 13, 1993. That schedule imposes various charges on the users of the Wheeler Ridge interconnect facilities. Those charges are imposed because the Commission found that the costs of the facilities should be recovered from those who use the interconnect, not from all ratepayers in general.

4. The original Schedule G-ITC was annulled by D.94-01-048; no interconnect charges were collected after December 31, 1993. Those charges that had been collected while G-ITC was in effect were ordered refunded. SoCalGas was ordered to continue tracking charges that would have been assessed under Schedule G-ITC in a memorandum account until such time that a new tariff could be put in place. A new Schedule G-ITC became effective April 13,1994.

5. The ICMA was created pursuant to D.94-01-048 to account for the lost interconnect charges.

6. The ICMA Surcharge became effective May 1, 1994. That surcharge was added to Schedule G-ITC in order to recover the lost interconnect charges and zero-out the ICMA.

7. The refund of the charges collected during the original G-ITC was stayed by D.94-04-087.

8. On November 2, 1998, FERC ordered SoCalGas to provide refunds to the interstate shippers who had used Wheeler Ridge during the first Schedule G-ITC period, July 13, 1993 to December 31, 1993.



9. Pursuant to the FERC order, SoCalGas refunded \$1.89 million. That amount was therefore added to the ICMA balance. In A.L. 2763 (filed November 20, 1998), SoCalGas sought to revise the ICMA Surcharge rate so that the ICMA balance would be recovered in approximately six months.

10. In Resolution G-3254, the Commission approved SoCalGas' A.L. 2763. The ICMA Surcharge was raised to 0.1247¢ per therm. The Resolution became effective on May 13, 1999, with the revised rate commencing on June 1, 1999. It was estimated that the ICMA balance would be fully amortized in approximately six months.

11. The \$1.890 million refund discussed above was made only to those shippers who were not also end-use customers. The Southern California Utility Power Pool and Imperial Irrigation District (SCUPP/IID), whose members were <u>both</u> interstate shippers and end-use customers, protested the refund to FERC. They successfully argued that since the interconnection charge was found by FERC to be invalid in its entirety, SoCalGas should be ordered to refund the charges to all interstate shippers, regardless of whether or not those shippers were also end-use customers of SoCalGas.

12. On June 1, 1999, FERC issued an Order of Refund Report. This Order directed SoCalGas to issue further refunds to interstate shippers such as SCUPP/IID who paid the interconnection charge and were also SoCalGas end-use customers during the period of July 13, 1993 through December 31, 1993 (the period of the original Schedule G-ITC). Pursuant to this FERC Order, SoCalGas has issued additional refunds, amounting to \$1.627 million, including interest. SoCalGas has recorded this amount into the ICMA.

13. SoCalGas' proposal to extend the current 0.1247¢ per therm ICMA Surcharge rate (modified to 0.124¢ per therm in A.L. 2820-A) until the balance is fully amortized is reasonable and should be approved. Extending the amortization period beyond the six-month time frame anticipated in Resolution G-3254 is preferable to increasing the ICMA Surcharge rate.

14. In its 1999 BCAP proceeding, SoCalGas has submitted a proposal whereby the Wheeler Ridge rates (contained in Schedule G-ITC) would be eliminated; instead of charging a rate for volumes of gas delivered through the interconnect facilities, SoCalGas would provide rolled-in ratemaking treatment.

15. If the BCAP decision should adopt SoCalGas' proposal, the only meaningful portion of Schedule G-ITC that would remain would be the ICMA Surcharge. Administratively, that would be awkward and confusing. SoCalGas' proposal to place the ICMA Surcharge in its own tariff would eliminate this potential for confusion.

16. SoCalGas' request to remove all references to the ICMA Surcharge from Schedule G-ITC should be approved.

17. SoCalGas' request to create a new tariff, Schedulo G-ICMA, dedicated solely to the ICMA Surcharge, should be approved. Rather than becoming effective September 1, 1999 as SoCalGas

9



requested in A.L. 2820, the new tariff should become effective on November 1, 1999, the effective date requested in A.L. 2820-A.

18. If SoCalGas' Wheeler Ridge BCAP proposal is adopted, future ratepayer confusion will be avoided. If the BCAP proposal is not adopted, then the two schedules (Schedule No. G-ITC and the new Schedule No. G-ICMA) will continue in effect; no further changes to either schedule would be necessary at that time.

19. This bifurcation of Schedule G-ITC should not be construed as giving SoCalGas tacit approval for its Wheeler Ridge BCAP proposal.

20. SoCalGas' request to drop the fourth decimal place from its current ICMA Surcharge rate should be approved. By truncating the current rate of 0.1247¢ per therm (to 0.124¢ per therm), the users of Wheeler Ridge will enjoy slightly lower rates. The new rate should become effective on November 1, 1999.

THEREFORE, IT IS ORDERED that:

1. Southern California Gas Company's (SoCalGas) request to remove all references to the Interconnect Charge Memorandum Account (ICMA) Surcharge from Schedule No. G-ITC is approved.

2. SoCalGas' request to create a new tariff, Schedule No. G-ICMA, dedicated solely to the ICMA Surcharge, is approved.

3. SoCalGas' request to continue the current ICMA Surcharge rate of 0.1247¢ per therm (modified to 0.124¢ per therm in A.L. 2820-A) until a FERC-ordered refund of \$1.627 million is recovered is approved. It is expected that the amortization period for this new refund will extend beyond the approximate six-month period that was approved in Resolution G-3242.

4. SoCalGas' request to truncate its current ICMA Surcharge rate of 0.1247¢ per therm to three decimal places is approved. The new authorized rate shall be 0.124¢ per therm.

5. The new ICMA Surcharge rate of 0.124¢ per therm shall become effective on November 1, 1999, as requested by SoCalGas in A.L. 2820-A. On that same date, the new Schedule No. G-ICMA shall become effective.

6. Advice Letters 2820 and 2820-A shall be marked to show that they were approved by Commission Resolution G-3262.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the state of California held on October 21, 1999; the following Commissioners voted favorably thereon:

11

Wesley Frankle

WESLBY M. FRANKLIN Executive Director

RICHARD A. BILAS President HENRY M. DUQUE JOSIAH L. NEEPER JOEL Z. HYATT CARL W. WOOD Commissioners