PROJECT NO. 34890

RULEMAKING PROCEEDING RELATING TO NET METERING AND INTERCONNECTION OF DISTRIBUTED GENERATION	**§ § § §**	**PUBLIC UTILITY COMMISSION OF TEXAS**

ORDER ADOPTING NEW §25.213
AS APPROVED AT THE APRIL 9, 2008 OPEN MEETING

The Public Utility Commission of Texas (commission) adopts new §25.213, relating to Metering for Distributed Renewable Generation with changes to the proposed text as published in the February 22, 2008 issue of the *Texas Register* (33 TexReg 1483). The new rule will establish a definition for metering as it relates to interconnected distributed renewable generation (DRG). The provision of metering as required by the new rule will satisfy the requirements for metering pursuant to Public Utility Regulatory Act (PURA) §39.914(d) and §39.916(f). This threshold issue is being addressed first in Project Number 34890 to provide sufficient clarity for the Electric Reliability Council of Texas (ERCOT) to begin development of profiles needed to settle sales of DRG by January 1, 2009 as required by PURA §39.916(j). The commission plans to complete the remainder of Project Number 34890 in the fourth quarter of 2008. This new rule is a competition rule subject to judicial review as specified in PURA §39.001(e). This new section is adopted under Project Number 34890.

On March 13, 2008, the commission received written comments from the following: The Alliance for Retail Markets and the Texas Energy Association for Marketers (collectively, "ARM and TEAM"); AEP Texas Central Company, AEP Texas North Company, CenterPoint Energy Houston Electric LLC, Oncor Electric Delivery Company LLC, and Texas-New Mexico Power Company (collectively, "Joint TDUs"); Interstate Renewable Energy Council (IREC);

The Lone Star Chapter of the Sierra Club (Sierra Club); Public Citizen, Environmental Defense, and Sustainable Energy & Economic Development Coalition (collectively, "Public Citizen *et al.*"); Reliant Energy (Reliant); The Solar Alliance, Texas Renewable Energy Industries Association, and the Texas Solar Energy Industries Association (collectively, "Joint Renewable Commenters"); Texas Industrial Energy Consumers (TIEC); and, TXU Energy Retail Company (TXU Retail).

In the preamble to the proposed rule, the commission put forth the following question for comment:

> *Should there be a standard tariff for transmission and distribution utilities, excluding river authorities, for the provision of metering for distributed renewable generation?*

Joint Renewable Commenters, Reliant, and TXU Retail supported the development of a standard tariff. Joint Renewable Commenters commented that a standardized tariff would ensure that all customers would have access to the same meter functionality at the same cost, no matter where they were located within ERCOT, or which transmission and distribution utility (TDU) was responsible for delivering energy. Joint Renewable Commenters cautioned, however, that a standard tariff would provide benefit only if it contains specific language regarding the deployment of meters and the manner and amounts in which meter charges are assessed. Reliant supported a standard tariff if the intent of the tariff was to stipulate the types of meters and charges that apply when the TDU, upon request from a DRG customer, installs meters for net metering service. Reliant opined that a standardized tariff would be consistent with the commission's finding in Project Number 29637 that more standardization will facilitate retail

electric provider (REP) participation in the retail market in all of the TDU service areas. While TXU Retail recognized that transmission and distribution charges may vary, it supports the idea of a standard tariff for TDUs to address the provisions of DRG metering.

ARM and TEAM, Joint TDUs and Sierra Club, on the other hand, did not see the need for the adoption of a standard tariff for DRG metering. Joint TDUs commented that a DRG owner's service is already covered by the commission's pro forma base tariff schedules. A standardized tariff should focus on customer impacts rather than specific TDU processes or meter types and metering tariff provisions for this rule should be clearly distinguished from the meter standards developed for advanced metering in Project Number 31418, according to Joint TDUs. While noting that standard tariff provisions already exist for distributed generation (DG) interconnection standards and forms, Joint TDUs claimed that the costs for the service should be TDU-specific. Nonetheless, Joint TDUs offered to develop a standard provision to be included in terms and conditions for DRG metering, as well as standard discretionary services and associated fees, as part of the second phase of this project, a more comprehensive rulemaking implementing the distributed renewable provisions of House Bill (HB) 3693 (en acted during the 80th session of the Texas Legislature).

ARM and TEAM opined that the provisions in the pro forma tariff for retail delivery service in §25.214(d)(1) (relating to Terms and Conditions of Retail Delivery Service Provided by Investor Owned Transmission and Distribution Utilities) that address metering will likewise apply to meters provisioned pursuant to this proposed section. ARM and TEAM commented that each TDU must submit a company-specific tariff for metering in compliance with proposed

subsection (b)(5) and this tariff would reflect charges recovering the differential cost of the metering required to achieve compliance, unless the meter was provided at no additional cost, as required by proposed subsection (b)(4). ARM and TEAM noted that any proposed charges in TDU tariffs are subject to review by interested parties and must meet the statutory "just and reasonable" requirement before they are approved by the commission. Sierra Club contended that because all exported energy is delivered to another customer (with an associated delivery charge), the TDU is automatically reimbursed for exported energy without any need for a separate export charge or standard tariff. Sierra Club urged the commission to eliminate barriers such as a standard tariff requirement for TDUs for distributed generators that otherwise restrict a customer's options to generate a part of their own power.

Commission response

Consistent with its determination in Project Number 29637, the commission agrees with Reliant that a standard tariff will facilitate REP participation in the market in all of the TDU service areas and will also benefit customers with facilities in multiple TDU areas. The commission does not agree with Joint Renewable Commenters that the charges should be the same in all TDU areas, as each TDU will have different costs and should recover those unique costs. Additionally, the commission agrees with the Joint TDUs that this issue should be undertaken in the more comprehensive rulemaking and therefore defers the standardization to that project. Other comments on the tariff provisions, such as the standard of review, need not be addressed now, but may be raised in connection with the commission's consideration of the issue later in the project. The commission does not concur with Sierra Club's view that standardizing tariff provisions relating to DRG is an

obstacle to deployment of this technology. Tariffs will be required for the TDUs to provide services related to these meters. Standardization will facilitate deployment by making the terms and conditions uniform across much of Texas.

General Comments:

IREC voiced concern that Texas has lost the "net" in net metering. IREC believed that it is essential to address the definition of net metering and offered its position that net metering is the difference between electricity that is supplied by an electric provider and the electricity that is generated by DRG and fed back to the electric provider over the distributed renewable generation owner's (DRGO's) billing period. IREC stated that every state uses some variant of the "billing period" concept in its definition of net metering such that the "netting" occurs over a month or a year, and that 11 states deemed by the Alliance for Retail Choice as having made "medium to good progress in retail electric choice" have adopted net metering definitions that include netting of in-flows and out-flows. IREC asserted that Texas is alone in contemplating that netting only occurs over 15 minute intervals and what Texas is contemplating is not net metering as the term is commonly understood. IREC pointed out that net metering provides an important incentive for investment in DRG in that it allows customers to "bank" their energy and use it at a time other than when it is produced, giving flexibility to the customer and allowing them to maximize the value of their production. IREC pointed out that the key benefit to net metering is that it enables customers to use their own generation to offset consumption over a billing period, meaning customers receive retail prices for the excess electricity they generate within a billing period.

Public Citizen *et al.* argued that the best net metering regulations among the states allow full retail credit with no subtractions, protect customers from additional fees and charges and encourage the use of DRG. They suggested that, while it appears to allow deduction of delivery charges for net energy reductions, this rule as proposed protects the utility's interests but places the customer in a position of risk and disadvantage in the market, as it appears to place the burden of any cost differential on the generator, falling most heavily on the small renewable generators.

TIEC stated that having a single meter running forward if the customer is consuming energy from the grid and running backward if the customer is sending energy to the grid, arriving at a "net" quantity of energy consumed over a given period is not an appropriate method for metering in the current ERCOT market structure and will create distortion and inaccuracies that run counter to PURA and the ERCOT protocols.

Reliant suggested that the term "net metering services" be used to be more consistent with PURA §39.914(c) and §39.916(j).

Commission response

The commission does not find the position of IREC and Public Citizen on netting over the billing period to be consistent with PURA §39.914(d) and §39.916(f) and therefore declines to amend the proposed language. The commission notes that "net metering" is a defined term in 16 U.S.C.A. §2621(11) and has various applications in other markets. It is often used to refer to "retail roll backs" or "banking" of electricity, whereby the meter for a

retail electric customer that produces electricity is allowed to roll backwards as the DRG (1) produces more electricity than is consumed by the customer's load and (2) places such surplus electricity on the distribution network. All charges incurred by such a retail electric customer for power the customer actually consumes from the grid at other times during the billing period are reduced or eliminated by these "retail roll backs" or "banking." However, the commission does not find that PURA §39.914 or §39.916 mandates the concepts of "retail roll backs" or "banking" as described above. Additionally, PURA §39.914(d) and §39.916(f) stipulate that meters for DRG be capable of measuring in-flows and out-flows. Meters with only one register, as is true of meters that are acceptable in at least six of the 11 states that IREC cites as having acceptable definitions of net metering, cannot fulfill this requirement.

The commission further declines to amend the language consistent with the comments of IREC and Public Citizen *et al.* that customers should receive retail prices for energy they export to the grid. PURA §39.914(c) and §39.916(j) state that the price for energy sold by the DRGO shall be at a value to which both parties agree. PURA §39.914(c) and §39.916(j) further suggest that a possible outcome of such an agreement might be the wholesale clearing price of the energy at the time of day that it is made available to the grid. Absent the ability to quantify out-flows, there is no basis for the DRGO and REP to determine when the energy is made available and arrive at the value of this energy in the wholesale market. Thus, under PURA, it is not sufficient merely to quantify the difference between in-flows and out-flows.

Regarding Public Citizen *et al.'s* concern that any cost differentials for meters be borne by the DRGO, this requirement is addressed by PURA §39.914(d) and §39.916(f), which require that the DRGO pay the differential cost of the metering unless the meters are provided at no additional cost. The commission thus makes no changes to the rule language based on this comment.

The commission further declines to adopt IREC and Reliant's suggested language because use of the term "net metering service" could be confusing, for the reasons discussed above, and is not necessary to implement the statute.

The Solar Alliance *et al.* believed that the proposed rule settles the question surrounding the definition of "net" in net metering, by clarifying that there is to be no netting of outflows against inflows in the settlement process. The Solar Alliance agreed that this outcome was consistent with HB 3693's specific language and intent. They stated that benefits can be achieved under this interpretation if alternative profiling methods are developed and made available to reflect the time of generation for DRG resources, especially solar, in settlement. The Solar Alliance opined and Sierra Club agreed that the implementation of accurate profiling is a necessary condition for enabling DRGOs to earn a fair market value for the load reduction benefits they provide to the grid and supported the direction and efforts of ERCOT staff and the Profiling Working Group in this regard. Specifically, the Solar Alliance strongly supported the development of separate profiled treatment of both consumption and surplus generation that reflects the time of generation of solar DG. They encouraged the commission to support these efforts as well, because they believe that a settlement solution that fails to account for the time of generation of

solar resources will result in a market failure, effectively preventing REPs from being able to offer owners of solar DG resources a fair market value for the energy they produce. Sierra Club and TIEC agreed that the settlement should reflect the full value of energy produced including the value at peak demand periods.

TIEC did not believe a profiling approach was the most accurate way of accounting for the amount of energy consumed and exported in given time periods and suggested that a better approach would be to measure in-flow and out-flow separately with advanced meters. ARM and TEAM expressed support for the rule's requirement for separate measurement of and accounting for energy delivered to the customer and surplus generation delivered from the customer to the distributed network, and stated that this functionality is essential in the competitive Texas energy market for accurate customer compensation for surplus generation, settlement, customer billing and assessment of fees for TDU services and the system benefit fund assessment.

Commission response

The commission adds language as suggested by Solar Alliance *et al*. and Sierra Club to the rule to reflect that ERCOT procedures will account for time of generation in the settlement process. The commission concurs with TIEC with regard to the use of advanced meters to account for time of generation, but as advanced meters are not generally available at this time, the language in the rule allows for ERCOT to employ profiling as a means of accounting for time of generation.

IREC suggested a definition of "outflow" be included in the rule with the meaning, "energy produced by distributed renewable generation and delivered to the distribution network."

Commission response

The commission reads "out-flow" to be synonymous with "surplus electricity."

The Sierra Club believed that small DG systems should be able to interconnect simply and without time delays and extra charges and that if DG becomes saturated in the market then the rules can be revisited to assure fairness for both customers and utilities, but at the moment, renewable DG must be promoted and made easy for all potential generators.

Commission response

The commission agrees that DG systems should be able to interconnect without excessive burden and plans to address that issue in the second rule in this project.

Subsection (a)

The Sierra Club recognized that the PUC does not have the authority to require municipalities and cooperatives to follow the proposed rules but suggested that language be added to encourage municipalities and cooperatives to follow these or similar rules. The Sierra Club also stated its belief that other types of energy generation, such as combined heat and power systems that are not strictly renewable should be allowed to interconnect and sell energy back to the grid.

Commission response

The commission declines to adopt the Sierra Club recommendation. While the customers of cooperatives and municipally owned electric utilities might benefit from standardized rules regarding DRG, PURA §39.002 specifically exempts municipally owned and cooperative electric utilities from the requirements of PURA §39.914 and §39.916.

The commission declines to include non-renewable distributed generation in this rule, because the rule is being adopted specifically to satisfy the requirements of PURA §39.914(d) and §39.916(f). PURA §39.914(d) specifically addresses certain solar applications, and PURA §39.916(a)(1) defines DRG, and limits DRG to the definition of renewable energy technology in PURA §39.904(d). Adding non-renewable distributed generation would be out of the scope of the language as proposed, and inconsistent with the intent of the sections being implemented. Special rules for the interconnection of combined heat and power facilities that meet the definition of distributed generation already exist in other provisions of Chapter 25.

Joint TDUs proposed adding the 2,000 kilowatt (kW) limitation from HB 3693. They also proposed that compliance with other commission interconnection rules be specified in the application section.

Commission response

The commission adopts language in subsection (b)(2) to incorporate the 2,000 kW limitation from HB 3693.

The commission declines to take up the issue regarding compliance with other commission interconnection rules in this rulemaking, as they will be addressed in the second phase of this project.

Subsection (b)(1)

Reliant suggested that the subsection be clarified to indicate that TDUs will be reporting metered values to "the entity responsible for settlement." Reliant further suggested that because ERCOT is the entity that accounts for energy use the rule should be modified to indicate that ERCOT would be accounting for metered values in settling the total load of the serving REP.

Commission response

The commission agrees with the suggestion of Reliant that referring to "the entity responsible for settlement" provides greater clarity to the rule and includes this phrase in subsection (b)(1).

TXU Retail supported the language with respect to small owners of DRG who desire to measure their surplus generation, but opined that there was a need for language addressing those DRG owners who did not wish to measure surplus generation. It further stated that the rule should address large DRG customers. It said that it supported the metering options in this paragraph for DRG owners who desire to measure surplus generation and those who do not, and proposed removing the phrase "and that desires to measure the generation's surplus electricity production." TXU Retail expressed its support of the ERCOT Distributed Generation Task

Force (DGTF) recommendation that DRG greater than 50 kW but less than two megawatts (MW) be metered by using interval data recorder (IDR) meters.

TXU Retail stated that it did not oppose earlier comments by Oncor and TNMP supporting meters rendered incapable of "spinning both ways" for customers who did not wish to measure their surplus generation and offered new language should this approach be adopted. The joint TDUs also supported this position.

Commission response

The commission agrees and adopts the language suggested by TXU Retail. The commission also notes that nothing in this rule requires replacement of existing IDR meters. The rule does not require the use of IDR meters for a customer with DRG less than 50 kW. However, if either the load or the DRG capacity is required to be settled on IDR data, both will be settled using IDR data rather than through the use of profiling.

IREC stated that, although net metering can be accomplished with a simple bi-directional meter, HB 3693 calls for a meter capable of measuring in-flows and out-flows. It suggested that the rule specify that TDUs install the lowest cost meter capable of providing the data required.

Commission response

The commission declines to adopt this change. While the commission is sensitive to the issue that IREC raises, it does not agree that it is appropriate to prescribe the use of the lowest cost meters in the rule. The commission expects TDUs to have cost effective

metering systems. However, the commission recognizes that each of the TDUs has had the ability to select meter systems from different manufacturers, and the lowest cost meters may not necessarily be compatible with each TDU's existing system, or be the most cost effective for each TDU to implement and maintain.

TXU Retail proposed that the term "premise" be replaced with "side of the meter" to be consistent with PURA §39.916(a).

Commission response

The commission agrees and adopts the proposed language.

Reliant proposed that the rules ensure that a TDU is not required to install net metering until it has verified that the customer has complied with all the technical requirements, rules or processes for interconnection.

Commission response

As this issue will be addressed in the second phase of this project, the commission declines to take up this issue in this rulemaking.

Reliant proposed that it be made clear that the surplus electricity generation that the DRG owner desires to measure is electricity being delivered from the DRG owner's premises to the distribution network.

Commission response

The commission acknowledges that surplus electricity generated by DRG will flow to the distribution network and is adopting the proposed language for clarity.

The Joint TDUs suggested that the last sentence be changed to provide that the two metered values "shall" rather than "should" be separately accounted for.

Commission response

The commission agrees and makes this change accordingly.

Sierra Club of Texas, expressing concern over the cost of special metering for DRG, suggested that the commission show preference for use of single advanced meters with time bin carryover for DRG applications and that meters capable of "spinning both ways" be used until advanced meters are available.

Commission response

The commission declines to adopt the proposed language. The commission finds, as discussed above, that the use of meters that "spin both ways" is inconsistent with PURA §39.914(d) and §39.916(f).

Subsection (b)(2)

The Joint TDUs commented that the permission for a TDU to charge for electricity consumption in its tariff should be made mandatory consistent with PURA §36.004. ARM and TEAM said

that, given the separate measurement of load and surplus generation, the purpose of this provision was unclear. They further offered language to clarify the DRGO's option to choose a metering methodology appropriate for the DRGO's preferences regarding measurement of surplus electricity and the capacity of the DRG.

Commission response

The commission agrees with the Joint TDU's proposed language as it ensures non-discriminatory assessment of TDU charges and clarifies the DRGO's options for metering methodologies.

IREC requested that TDU fees be calculated on the net of in-flows minus out-flows, based on the assumption that DRG out-flows serve nearby loads and thus provide a system benefit by avoiding the need for long-distance transmission to serve distant loads.

Commission response

Consistent with the discussion above, the commission does not find this suggestion to be consistent with PURA §39.916, and therefore declines to make the recommended modification.

Subsection (b)(3)

TXU Retail and the Joint TDUs suggested that this paragraph be revised, replacing the term "transmission and distribution service provider" with "transmission and distribution utility." TXU Retail recommended an almost identical replacement in subsection (b)(5).

Commission response

The commission agrees that "transmission and distribution utility" is better terminology and modifies the subsections accordingly.

The Joint TDUs suggested that, while it may exceed the scope of this rulemaking, the second phase of this project regarding DRG should provide explicitly for the transition of existing DRG installations to metering approved by the commission pursuant to this rulemaking.

Commission response

The commission agrees with the Joint TDUs and will address this issue in the second phase of this project.

Subsection (b)(4)

Sierra Club suggested that the commission express a preference that, where practical, metering for DRG should be provided at no additional cost to the DRG owner.

Commission response

The commission declines to amend the rule based on Sierra Club's recommendation, because the proposed language in subsection (b)(4) is consistent with PURA §39.914(d) and §39.916(f), and the Sierra Club's recommendation is not.

Subsection (b)(6)

The Joint Renewable Commenters offered additional language to clarify that, beginning January 1, 2009, owners of DG will be allowed to sell surplus generation to "the retail electric provider that serves the DRG owner's load."

The Joint TDUs noted that while today it is unlikely for owners of DRG to sell surplus generation, some who would qualify under the provisions of HB 3693 are doing so, and that the January 1, 2009 date is specifically relevant to the ERCOT settlement implementation. Joint TDUs offered language to modify subsection (b)(6) to indicate that owners of DRG may begin selling surplus generation at any time, but that TDUs and ERCOT are not required to accept meter data pursuant to subsection (b)(1) until January 1, 2009.

Commission response

The commission finds that DRGOs may sell surplus electricity at any time, and concludes that the adoption of this rule does not affect their ability to do so. The commission thus declines to adopt the Joint Renewable Commenters' language. The commission recognizes that TDUs and ERCOT are required to begin settlement of surplus generation by January 1, 2009 and adopts the language proposed by the Joint TDUs.

All comments, including any not specifically referenced herein, were fully considered by the commission. In adopting these sections, the commission makes other minor modifications for the purpose of clarifying its intent.

This new rule is adopted under the Public Utility Regulatory Act, Texas Utilities Code Annotated §14.002 (Vernon 2007 and Supp. 2007) (PURA), which provides the Public Utility Commission with the authority to make and enforce rules reasonably required in the exercise of its powers and jurisdiction, and in particular PURA §38.002, which authorizes the commission to adopt standards relating to measurement, quality of service, and metering standards, PURA §39.101(b)(3), which provides the commission the authority to adopt and enforce rules relating to customers' right of access to on-site DG, PURA §39.914, which provides for the sale of surplus electricity produced by a public school building's solar electric generation panels, and PURA §39.916, which directs the commission to establish standards for DRG.

Cross Reference to Statutes: Public Utility Regulatory Act §§14.002, 38.002, 39.101, 39.914, and 39.916.

§25.213. Metering for Distributed Renewable Generation.

(a) **Application.**

This section applies to transmission and distribution utilities, excluding river authorities, owners of distributed renewable generation, and the entity responsible for settlement.

(b) **Metering.**

(1) Upon request by a customer that has, or is in the process of installing distributed renewable generation with a capacity of less than 50 kW on the retail electric customer's side of the meter and that desires to measure the generation's out-flow production, a transmission and distribution utility shall provide metering at the point of common coupling using one or two meters that separately measure both the customer's electricity consumption from the distribution network and the out-flow that is delivered from the customer's side of the meter to the distribution network and separately report each metered value to the transmission and distribution utility. The two metered values shall be separately accounted for by the entity responsible for settlement.

(2) Upon request by a retail electric customer that has, or is the process of installing distributed renewable generation with a capacity equal to or greater than 50 kW up to 2,000 kW on the retail electric customer's side of the meter, a transmission and distribution utility shall provide one or two interval data recorders at the point of common coupling that separately measure both the customer's electricity consumption from the distribution network and the out-flow that is delivered from the retail electric customer's side of the meter to the distribution network and separately report each metered value to the transmission and distribution utility.

The two metered values shall be separately accounted for by the entity responsible for settlement.

(3) Upon request by a retail electric customer that has, or is in the process of installing distributed renewable generation with a capacity of less than 50 kW on the retail electric customer's side of the meter and that does not desire to measure the generation's out-flow production, a transmission and distribution utility shall provide metering in accordance with paragraph (1) of this subsection or, at the transmission and distribution utility's option, install a meter that measures the customer's electricity consumption from the distribution network but does not measure the out-flow that is delivered from the retail electric customer's side of the meter to the distribution network. Unless an existing distributed renewable generation owner requests to have the existing meter replaced, the transmission and distribution utility may, at its option and expense, replace an existing distributed renewable generation owner's meter with a meter of a type specified in this rule.

(4) Pursuant to the applicable schedule in its tariff, a transmission and distribution utility shall charge for the customer's electricity consumption from the distribution network as measured by the metering installed pursuant to paragraphs (1), (2) or (3) of this subsection.

(5) A transmission and distribution utility shall not provide metering for purposes of PURA §39.914(d) and PURA §39.916(f), that is inconsistent with paragraph (1), (2) or (3) of this subsection, unless ordered by the commission.

(6) The distributed renewable generation owner shall pay any significant differential cost of the metering.

(7) Transmission and distribution utilities shall file tariffs for metering under this section within 60 days of its effective date.

(8) Owners of distributed renewable generation may begin selling out-flow at any time, but transmission and distribution utilities are not required to comply with paragraph (1), (2) or (3) of this subsection, as they relate to reporting the two metered values, and the entity responsible for settlement is not required to accept the meter data provided pursuant to paragraph (1), (2) or (3) of this subsection until January 1, 2009.

(9) The entity responsible for settlement shall develop processes for settlement of electricity consumption and out-flow that reflects time of generation by January 1, 2009.

This agency hereby certifies that the adoption has been reviewed by legal counsel and found to be a valid exercise of the agency's legal authority. It is therefore ordered by the Public Utility Commission of Texas that §25.213 relating to Metering for Distributed Renewable Generation is hereby adopted with changes to the text as proposed.

SIGNED AT AUSTIN, TEXAS the 24th day of April 2008.

PUBLIC UTILITY COMMISSION OF TEXAS

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BARRY T. SMITHERMAN, CHAIRMAN

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JULIE CARUTHERS PARSLEY, COMMISSIONER

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PAUL HUDSON, COMMISSIONER

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