



Portland General Electric Company

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portlandgeneral.com

June 12, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 2143 – In the Matter of Public Utility Commission of Oregon, Investigation into
Resource Adequacy

Dear Filing Center:

Enclosed for filing in the above-mentioned docket is Portland General Electric Company's (PGE) Comments on Staff's Draft Resource Adequacy Rules Proposal.

Thank you in advance for your assistance.

Sincerely,

Danielle McCain

Danielle McCain
Office Administrator

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 2143

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON

Investigation into Resource Adequacy

**PORTLAND GENERAL ELECTRIC
COMMENTS ON STAFF
DRAFT RESOURCE ADEQUACY
RULES PROPOSAL**

INTRODUCTION

Portland General Electric Company (PGE) submits these comments in UM 2143 *State Investigation into Resource Adequacy* (RA) in response to the Public Utility Commission of Oregon (Commission or OPUC) Staff’s *Draft Resource Adequacy Rules Proposal* circulated May 18, 2023.¹ Staff’s proposed rules follow an April 5, 2023, stakeholder workshop² at which PGE expressed general support for Staff’s *Updated Process Proposal for Continuation of UM 2143*³ that included a recurring informational RA filing for all Commission-regulated entities and a binding compliance program for Commission-regulated entities that are not part of a regional program such as the Western Power Pool (WPP) Western Resource Adequacy Program (WRAP). Staff’s process proposal followed a Special Public Meeting on January 10, 2023, at which Commissioners heard about RA from the Western Electricity Coordinating Council, Northwest Power and Conservation Council, and the Western Power Pool (WPP).⁴

PGE’s comments initially address Staff’s invitation to respond to: the establishment of planning reserve margin (PRM) and qualifying capacity contribution (QCC) methods in the rules; the ability to begin compliance filings in the 2024 calendar year for entities that are “not committed to a regional RA program”; and “whether and how to establish the penalty amount [...] the Commission may impose on a non-compliant” entity.⁵ PGE then responds to the draft rules in general per the structure of the May 18, 2023, filing. In general, and to the extent practicable,

¹ UM 2143, Staff Draft Resource Adequacy Rules Proposal, May 18, 2023, available at: <https://edocs.puc.state.or.us/efddocs/HAH/um2143hah10434.pdf>

² UM 2143, Staff Workshop, April 6, 2023, Notice available at: <https://edocs.puc.state.or.us/efddocs/HNA/um2143hna134646.pdf>

³ UM 2143, Staff’s Updated Process Proposal for Continuation of UM 2143, February 17, 2023, available at: <https://edocs.puc.state.or.us/efddocs/HAH/um2143hah93525.pdf>

⁴ OPUC, Special Public Meeting UM 2143 Resource Adequacy Investigation Update/Technical Conference on the State of RA, January 19, 2023, available at: <https://www.oregon.gov/puc/news-events/Pages/default.aspx>

⁵ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p2, May 18, 2023, available at: <https://edocs.puc.state.or.us/efddocs/HAH/um2143hah10434.pdf>

PGE supports using the updated WRAP Detailed Design⁶ document and FERC-approved WRAP Tariff⁷ to inform State Program methodologies and rule language.

Importantly, Staff’s draft resource adequacy rules proposal would establish new definitions that are key to understanding PGE’s comments:

- “Regional Participant” means an electrical investor-owned utility (IOU) or electricity service supplier (ESS) – collectively load serving entities (LSEs) – participating in a regional reliability planning program such as the WPP WRAP.⁸
- “State Participant” means an LSE that is not participating in a regional resource adequacy program such as the WRAP.⁹
- “Informational Filing” means a “non-binding discussion” of an LSE’s (both Regional and State Participants) resource adequacy plans over a four-year period.¹⁰
- “State Program” means the binding two-year RA compliance program administered by the OPUC for State Participants.¹¹

I. PLANNING RESERVE MARGIN ESTABLISHMENT

Staff indicated they are seeking to “includ[e] as much detail as possible about establishing PRM [...] in the rules.”¹² While PGE supports using WRAP methodologies to inform the design of the State Program, quantifying the State Program’s PRM could be challenging given the limited pool of potential participants, the smaller footprint, and available OPUC resources. The WRAP’s monthly forward showing PRMs are calculated through “probabilistic LOLE [loss of load expectation] analysis and represent[] the amount of dependable capacity excess of the P50 load forecast to meet periods of high demand, resource outages, and other variable conditions while maintaining the WRAP’s reliability threshold of one failure to meet load in a ten-year period.”¹³

⁶ WPP WRAP, Detailed Design, March 2023, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

⁷ WRAP Tariff of Northwest Power Pool doing business as Western Power Pool, available at: https://www.westernpowerpool.org/private-media/documents/WRAP_Tariff_12-12-22_W0327945x8DF47_2.pdf

⁸ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p3 §(2)(f), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

⁹ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p3 §(2)(g), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

¹⁰ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p3 §(2)(l) and p4 §(3)(c)(i) & §(4)(d)(i), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

¹¹ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p3 §(2)(l) and p5 §(5)(e), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

¹² UM 2143, Staff Draft Resource Adequacy Rules Proposal, p2 May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

¹³ WRAP Tariff of Northwest Power Pool doing business as Western Power Pool, p57, available at: https://www.westernpowerpool.org/private-media/documents/WRAP_Tariff_12-12-22_W0327945x8DF47_2.pdf

Ahead of a November 16, 2020 workshop in UM 2024, PGE shared a straw proposal for a state RA program based on the then conceptual design for a regional RA program. PGE’s straw proposal, circulated November 9, 2020 (although not posted as an action in the UM 2024 docket), recommended that if the regional program launches, the State Program PRM should align with that of the WRAP. PGE recommends that the Commission consider using the WRAP PRMs as available, and not attempt to determine unique PRMs for the State Program.

II. QUALIFYING CAPACITY CONTRIBUTION METHODOLOGY

Staff is seeking to “includ[e] as much detail as possible about establishing [...] qualifying [capacity] contribution methods in the rules.”¹⁴ Again, to the extent practicable, PGE supports using the updated WRAP Detailed Design document and FERC-approved WRAP Tariff to inform State Program methodologies regarding the QCC of resources and contracts. The WRAP’s QCC *methodologies* vary by resource type, but the WRAP determines specific QCCs for all resources submitted.¹⁵ However, Staff’s draft rules propose the Commission “set a Qualified Capacity Contribution for each resource *type* [emphasis added] no later than February 1 of a filing year.”¹⁶ PGE seeks clarity as to whether Staff is proposing the Commission set the QCC for resources by type, or whether the Commission sets QCC methodologies by type that are then used to determine the QCC of specific resources. A variety of resource specific approaches are used by the WRAP when modelling the availability of resource capacity in the program’s regional footprint:

- effective load-carrying capability (ELCC) for variable energy resources (VERs) and energy storage resources (ESRs);
- unforced capacity (UCAP) for traditional generators;
- installed capacity for demand response (DR); and
- a stand-alone methodology for storage hydro.¹⁷

As part of resource adequacy straw proposals circulated November 9, 2020, PGE recommended that “the state program could leverage existing information on resource capacity contribution from regional IRPs without the need to conduct Oregon specific studies [...] Requirements and limitations for the qualification and contributions of contracts and market purchases should be aligned with the [WPP regional design.” To the extent the Commission is seeking relevant QCCs,

¹⁴ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p2, May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

¹⁵ WPP WRAP, Detailed Design, March 2023, pp67-68 Table 2-5, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

¹⁶ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p2 §(5)(c), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

¹⁷ WRAP Tariff of Northwest Power Pool doing business as Western Power Pool, p57, available at: https://www.westernpowerpool.org/private-media/documents/WRAP_Tariff_12-12-22_W0327945x8DF47_2.pdf

PGE’s integrated resource plan (IRP) uses the Sequoia model to calculate seasonal ELCC for resource types at various locations on the system and with differing transmission firmness.¹⁸ For simplicity, OPUC Staff could consider using PGE’s IRP ELCCs as a convenient proxy for ESSs serving load in our service territory as an alternative to developing QCC methodologies to be put in rules.

III. FEASIBILITY OF 2024 FILINGS FOR STATE PARTICIPANTS

Staff sought feedback on the “ability to begin compliance filings in the 2024 calendar year” for State Participants in the State Program.¹⁹ PGE appreciates Staff’s intention of using 2024 compliance as a “trial run for the ongoing program,” but as PGE intends to be a Regional Participant in a Regional Program it defers to input from LSEs that would be affected by a State Program.

IV. PENALTIES FOR NON-COMPLIANCE

Staff also sought feedback on “whether and how to establish the penalty amount” that the Commission may impose on non-compliant State Participants in the State Program.²⁰ Staff’s draft rules propose a “State Participant whose plan is not approved 30 days after the Commission identified deficiencies shall be subject to a fine, revocation of Electric Service Supplier certification, or some other appropriate penalty determined by the Commission. The fine shall be assessed on a per-MW basis for capacity or transmission deficiencies.”²¹ PGE still supports²² consideration of ESS decertification as a potential penalty for repeated failures to cure an RA deficit in the State Program.²³

To maintain consistency between the WRAP and the State Program it is essential that any penalties in the state-level framework are at least as stringent as the charges in the regional program. For context, a WRAP participant that fails to resolve identified deficiencies in either or both of its forward showing capacity requirement and its forward showing transmission requirement will be assessed a “Deficiency Charge” for each month (during a binding season) for

¹⁸ LC 80, PGE 2023 Clean Energy Plan and Integrated Resource Plan, pp557-559 Table 133 (Tuned ELCC values by year - tuned ELCC values are calculated in a model that is resource adequate or close to resource adequate), available at: <https://edocs.puc.state.or.us/efdocs/HAA/lc80haa8431.pdf>

¹⁹ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p2, May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

²⁰ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p2, May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

²¹ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p4, May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

²² UM 2143, PGE’s Comments on Staff’s Updated Process Proposal for Continuation of UM 2143, p9, March 13, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAC/um2143hac161058.pdf>

²³ For example, the WRAP Operations Program has an Energy Delivery Charge Rate that escalates with cumulative failures. WPP WRAP, Detailed Design, March 2023, p156 §2.5, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

which a deficiency is identified.²⁴ The WRAP deficiency charge methodology can be found in the WRAP Tariff,²⁵ but a narrative explanation will enable a qualitative assessment of its potential to inform the State Program.

WRAP deficiency charges factor in the maximum (capacity and/or transmission) deficiency, whether there are multiple deficiencies within a single binding season, and whether there are multiple deficiencies across a forward showing year (a Summer Season and the following Winter Season).²⁶

- The monthly deficiency is the greater of the monthly capacity deficiency or monthly transmission deficiency (in MW).
- For a Summer Season, a deficient participant will be charged based on its largest monthly deficiency in the Summer Season multiplied by the annual cost-of-new-entrant (CONE) multiplied by the Summer Season Annual CONE factor.
 - The CONE is the estimated cost of a new peaking natural gas-fired generation facility (in \$/kW-yr).
 - The Summer Season Annual CONE factor varies based on the ratio of the WRAP's total aggregate capacity deficiency for that season divided by the peak load forecast for that season (so the greater the overall program deficit, the higher the multiplier).
- Additional summer deficiencies are multiplied by a twelfth of the annual CONE.
- For the following Winter Season, any monthly deficiency in excess of the maximum summer deficiency will be charged incrementally according to the annual cone factor and Winter Season Annual CONE factor.
 - The Winter Season Annual CONE factor varies based on the ratio of the WRAP's total aggregate capacity deficiency for that season divided by the peak load forecast for that season.
- Additional winter deficiencies are multiplied by a twelfth of the annual CONE.
- If there is either a summer or a winter deficit in a forward showing year, the seasonal CONE factors for the following forward showing year will be set to maximum.

²⁴ WPP WRAP, Detailed Design, March 2023, p81 §2.5, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

²⁵ WRAP Tariff of Northwest Power Pool doing business as Western Power Pool, §17 available at: https://www.westernpowerpool.org/private-media/documents/WRAP_Tariff_12-12-22_W0327945x8DF47_2.pdf

²⁶ WPP WRAP, Detailed Design, March 2023, p82, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

WRAP deficiency charges are then allocated pro rata based on peak load to participants with no deficiencies. The rules for a state-level RA framework should reference what happens to the penalties collected.

In terms of the WRAP's deficiency charge methodology, the only component that relies on the existence of a larger regional program are the CONE and the seasonal annual CONE factors, which are meant to "reflect whether, and the extent to which, the WRAP Region as a whole is expected to have a capacity deficiency during the period for which the Deficiency Charge is being calculated."²⁷ The Commission could consider adopting the CONE used by the WRAP, while adapting the language from the WRAP tariff on deficiency charges but excluding references to the seasonal CONE factors. However, this would make penalties under the State Program potentially less expensive than the WRAP, which could encourage the forum shopping. Such a disparity could be potentially balanced by a State Participant only having 30 days to remedy any deficiencies identified in their State Program,²⁸ compared with the WRAP's two-month cure period.²⁹

V. §(2) DEFINITIONS FOR THIS DIVISION

Staff proposed defining RA as the "expected ability of a Load Serving Entity to supply aggregate electric power and energy to meet the requirements of their consumers at all times."³⁰ PGE recommends that a more precise definition of RA could provide clarity as stakeholders continue to navigate this proceeding. Staff's definition appears to adapt part of the National Association of Regulatory Utility Commissioners (NARUC) characterization that "[r]esource adequacy is the ability of the electric system to supply aggregate electric power and energy to meet the requirements of consumers at all times", but NARUC also includes the long-term planning aspect of RA through which an LSE is then "[a]ble to meet demand with sufficient supply-side and demand-side resources."³¹ PGE's IRP states that RA refers "to planning to have enough resource generation, efficiency measures and demand-side resources to serve loads across a wide range of conditions with a sufficient degree of reliability."³² PGE suggests that stakeholders consider expanding the definition of resource adequacy to include the planning actions that are undertaken to ensure load can be served in the future.

²⁷ WPP WRAP, Detailed Design, March 2023, p162, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

²⁸ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p5 §(5)(h)-(i), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

²⁹ WPP WRAP, Detailed Design, March 2023, p52, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

³⁰ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p4 §(2)(e), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

³¹ NARUC, Resource Adequacy Primer for State Regulators, July 2021, p 63, available at: <https://pubs.naruc.org/pub/752088A2-1866-DAAC-99FB-6EB5FEA73042>

³² LC 80, PGE 2023 Clean Energy Plan and Integrated Resource Plan, p63, available at: <https://edocs.puc.state.or.us/efdocs/HAA/lc80haa8431.pdf>

VI. §(3) ELECTRIC COMPANY INFORMATIONAL FILING REQUIREMENTS

Staff's draft RA rules propose IOUs provide an Informational Filing to the Commission as part of their IRP, which for Regional Participants must include their "most recent data submission" to the WPP WRAP.³³ While PGE appreciates this data may be included in the IRP as an Appendix, the information contained in such submissions to Qualified Regional Programs is highly confidential and commercially sensitive. PGE recommends that the draft rules include a confidentiality provision stating that this highly confidential, commercially sensitive data will be adequately protected and only provided to OPUC Staff.

Staff's draft RA rules also propose IOUs (and ESSs) include a "monthly P50 Peak Load Forecast" covering "a period of the greater of four years or the longest available timeline" that use "methods consistent with the outputs of the" WRAP's Advisory Forecast.³⁴ PGE seeks to establish a mutual understanding among stakeholders on the inputs and outputs of the WRAP. WRAP Participants are required to provide "8760-hour actual historical load data for the previous year (initial request will need at least 10 years of data, subsequent request will add an additional year annually)" as an input into the Annual Assessment that determines (among other outputs) the forward showing PRM for year five Summer/Winter seasons in the output of the Annual Assessment.³⁵ In the WRAP Advanced Assessment participant's peak loads are then forecast based on historical loads with a "program-wide annual growth rate of 1.1%."³⁶ For the WRAP forward showing, each participant may forecast their seasonable P50 peak loads using historical base load plus a WPP established growth factor or "an alternative growth rate to be validated by an independent entity."³⁷ For both the Annual Assessment and the forward showing, the WRAP takes a participant's historical load and applies a standard load growth factor. The Commission should consider whether such a standard load growth factor should be applied to State Participant's Informational Filings.

In addition, Staff's draft RA rules also propose IOUs (and ESS) include a "monthly forecast of transmission requirements" covering "a period of the greater of four years or the longest available timeline" that use "methods consistent with the outputs of the" WRAP's Advisory Forecast.³⁸

³³ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p4 §(3)(b), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

³⁴ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p4 §(3)(c)(i), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

³⁵ WPP WRAP, Detailed Design, March 2023, p85, p88 and p86 Table 2-9, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

³⁶ WPP WRAP, Detailed Design, March 2023, p58, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

³⁷ WPP WRAP, Detailed Design, March 2023, p59, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

³⁸ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p4 §(3)(c)(ii), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

PGE seeks clarity on the meaning of “transmission requirements” and how they relate to Staff’s proposal that a “State Participant must demonstrate that it has firm transmission rights to deliver 75% of the Compliance Resources from generation source to load sink.”³⁹

VII. §(5) STATE PROGRAM REQUIREMENTS

To reduce the ongoing administrative burden of complying with program requirements PGE recommends including as much detail as possible on Staff’s proposed waivers to the State Program transmission requirement.⁴⁰ To the extent practicable, PGE supports using the updated WRAP Detailed Design document and FERC approved WRAP Tariff to inform State Program methodologies. Section 16.3.2 of the WRAP Tariff contains the terms, conditions and limitations for the four exemptions from its forward showing transmission requirements: enduring constraints (Section 16.3.2.1), future firm available transfer capability (ATC) is expected (Section 16.3.2.2), transmission outages and derates (Section 16.3.2.3), and counterflow of a qualifying resource (Section 16.3.2.4).⁴¹ In particular, PGE recommends including additional language regarding counterflow of an eligible resource, informed by the explanation provided in the updated WRAP Detailed Design document that it must be a “direct and proportional counterflow transmission” that supports delivery of capacity from a qualifying resource to load and that “the counterflow must be directly between two BAAs [balancing authority areas].”⁴²

PGE also recommends explicitly adding language that limits the repeated use of waivers to address the same transmission issue. For enduring transmission constraints, the WRAP Tariff states a participant does not have to initially acquire transmission rights if they are only available for longer than one year, but that participant “shall not qualify [for an exception] hereunder for the same path (or across the same constraint) for the same season of the subsequent year if the Participant again declines to obtain such transmission rights that are available for more than one year.”⁴³ Similarly, if firm ATC transmission service rights are only available for a duration of more than one year the WRAP participant may initially decline them and seek an exception, but the participant shall “not qualify for an exception hereunder for the same path (or across the same constraint) for the same season of the subsequent year if the Participant again declines to obtain such transmission service rights that are available for a duration of more than one year.”⁴⁴

³⁹ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p4 §(5)(g), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

⁴⁰ UM 2143, Staff Draft Resource Adequacy Rules Proposal, p4 §(5)(g), May 18, 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2143hah10434.pdf>

⁴¹ WRAP Tariff of Northwest Power Pool doing business as Western Power Pool, pp53-56, available at: https://www.westernpowerpool.org/private-media/documents/WRAP_Tariff_12-12-22_W0327945x8DF47_2.pdf

⁴² WPP WRAP, Detailed Design, March 2023, pp77-78, available at: https://www.westernpowerpool.org/private-media/documents/2023-03-10_WRAP_Draft_Design_Document_FINAL.pdf

⁴³ WRAP Tariff of Northwest Power Pool doing business as Western Power Pool, p54 §16.3.2.1, available at: https://www.westernpowerpool.org/private-media/documents/WRAP_Tariff_12-12-22_W0327945x8DF47_2.pdf

⁴⁴ WRAP Tariff of Northwest Power Pool doing business as Western Power Pool, pp54-55 §16.3.2.2, available at: https://www.westernpowerpool.org/private-media/documents/WRAP_Tariff_12-12-22_W0327945x8DF47_2.pdf

CONCLUSION

PGE looks forward to further discussing Staff's draft resource adequacy rules proposal, and stakeholder responses, at the workshop on June 30, 2023.

Respectfully submitted this 12th day of June 2023.

/s/ Shay LaBray

Senior Director, Regulatory Affairs and Strategy

Enclosures:

cc: Michael O'Brien