



Ontario Energy Board Commission de l'énergie de l'Ontario

DECISION AND ORDER

EB-2016-0310

HENVEY INLET WIND LP

Application for Leave to Construct Transmission Facilities
between Henvey Inlet First Nation Reserve No. 2 and Parry Sound,
Ontario

BEFORE: Allison Duff
Presiding Member

Emad Elsayed
Member

May 18, 2017

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2 INTRODUCTION AND SUMMARY

This is a decision of the Ontario Energy Board (OEB) on an application filed by Henvey Inlet Wind GP Inc. on behalf of Henvey Inlet Wind LP (the Applicant or Henvey Inlet).

Henvey Inlet applied to the OEB under Section 92 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B (Act) for an order or orders granting leave to construct transmission facilities between Henvey Inlet First Nation Reserve No. 2 (Reserve) and Parry Sound, Ontario (Application). The Application was amended on November 30, 2016 to remove potential route variations from the main route, as the variations were not being pursued by the Applicant.

Henvey Inlet also applied under Section 97 of the Act for approval of the form of land use agreements and under Section 101 of the Act authorizing the construction of portions of the proposed transmission facilities upon, under or over a highway, utility line or ditch.

The OEB grants the Application as amended, subject to the conditions of approval contained in the Order.

2.1 Proposed Transmission Facilities

The proposed transmission facilities are required to connect a renewable wind generation facility on the Reserve known as the Henvey Inlet Wind Energy Centre (HIWEC) to the Independent Electricity System Operator (IESO) controlled grid with a contracted capacity of up to 300 MW. The proposed transmission facilities include:

- two 230 kV/34.5 kV substations known as the North and South Project Substations that will step up power from the HIWEC Project;
- a 230 kV switching station in the Township of Seguin adjacent to the existing Hydro One Networks Inc. (Hydro One) 230 kV circuits E26 and E27, and located approximately 0.6 km east of Hydro One's Parry Sound transformer station, (switching station) at the interconnection point to Hydro One's transmission system; and
- a 103 km three-phase single 230 kV circuit overhead transmission line, comprised of:
 - an approximately 8 km segment running from the North Project Substation and an approximately 6 km segment running from the South Project Substation, to a point on the Reserve where these two segments join together (Tap Point); and

- an approximately 89 km segment that runs from the Tap Point to the switching station

(collectively the proposed Transmission Facilities).

2.2 The OEB's Jurisdiction

The Application was filed under Section 92 of the Act. The OEB's power to grant an applicant permission to build transmission facilities arises from Subsection 92(1) of the Act which states:

92. (1) No person shall construct, expand or reinforce an electricity transmission line or an electricity distribution line or make an interconnection without first obtaining from the Board an order granting leave to construct, expand or reinforce such line or interconnection. 1998, c.15, Sched.B, s.91 (1).

In discharging its duties in a Section 92 proceeding, the OEB is also bound by the provisions of Section 96 of the Act, which states:

96.(1) If, after considering an application under Section 90, 91 or 92 the Board is of the opinion that the construction expansion or reinforcement of the proposed work is in the public interest, it shall make an order granting leave to carry out the work.

(2) In an application under Section 92, the Board shall only consider the following when, under Subsection 1, it considers whether the construction, expansion or reinforcement of the electricity transmission line or electricity distribution line or the making of the interconnection, is in the public interest:

1. The interests of consumers with respect to prices and the reliability and quality of electricity service.
2. Where applicable and in a manner consistent with the policies of the government of Ontario, the promotion of the use of renewable energy resources. 2009, c.12, Schedule D, s.16.

The Act also gives the OEB oversight of the form of agreement negotiated with landowners whose lands are affected by the approved route or location of a proposed transmission project. Section 97 of the Act states:

97. In an application under Section 90, 91 or 92, leave to construct shall not be granted until the applicant satisfies the Board that it has offered or will offer to each owner of land affected by the approved route or location an agreement in a form approved by the Board.

Other considerations relating to the construction of a generation facility, including environmental impacts, are outside the OEB's jurisdiction. However, the OEB's approval of a leave to construct application is contingent on the applicant obtaining all necessary permits and approvals including environmental approvals.

Environmental matters with respect to the off-Reserve portion of the proposed Transmission Facilities are subject to the requirements of the Category B Environmental Screening Process pursuant to Ontario Regulation 116/01, made under the *Environmental Assessment Act* (EAA Ontario), which falls under the jurisdiction of Ministry of the Environment and Climate Change (MOECC). At the time the Application was submitted, the Applicant was in the process of completing a minor amendment to its Environmental Assessment (EA) to reflect revisions to the areas to be affected by the construction footprint for the proposed Transmission Facilities and associated laydown areas and access roads.

Environmental matters with respect to the on-Reserve portion of the proposed Transmission Facilities and HIWEC located within Henvey Inlet Reserve No. 2 fall within the jurisdiction of Henvey Inlet First Nation. Henvey Inlet First Nation has the authority to issue its own EA Permit for the HIWEC, including portions of the proposed Transmission Facilities, pursuant to its Land Code under the *First Nations Lands Management Act*. The Applicant has obtained an EA Permit from Henvey Inlet First Nation for the on-Reserve portions of the proposed Transmission Facilities.

In respect to the environmental matters within the Magnetawan and Shawanaga First Nations, the Applicant submitted that the Land Codes only came into effect fairly recently. As a result, the provincial environmental assessment has been carried out by Henvey Inlet to include each of the Magnetawan and Shawanaga reserves. The Applicant is working with both First Nations to get adoption of the provincial environmental assessment, as it relates to each reserve, consistent with the requirements of the *First Nations Lands Management Act*.

3 THE PROCESS

Henvey Inlet filed an amended Application on November 30, 2016. The OEB issued a Notice of Application on January 11 and 13th, 2017 (Notice) and directed the Applicant to serve and publish the Notice inviting participation from interested parties.

The OEB issued Procedural Order (PO) No. 1 on February 16, 2017, in which it set some procedural steps and denied intervenor status to Mr. Richard Kaster and Mrs. Anne Kaster (Kasters) and Mr. Jeffrey Todd Hull.

On March 8, 2017, Mr. Hull, through his solicitor, filed a Notice of Motion (Motion) for an Order requesting that the OEB review PO No. 1 and allow Mr. Hull intervenor status in this proceeding. The grounds for the Motion include a statement that the route of the proposed transmission line crosses over, under or through the property of Mr. Hull, and therefore, he is an affected landowner. The Motion asserts that PO No. 1 is based on an error in fact.

On March 9, 2017, the Kasters filed an email objecting to the denial of intervenor status and indicating that maps included with the Application clearly indicate that the Kasters' property is within the boundaries of the proposed transmission corridor as permanently affected lands.

After these objections were filed, the Applicant advised the OEB that, based on recently obtained information, Mr. Hull is an affected landowner in relation to the proposed Transmission Facilities and will be offered a standard form of land agreement.

The OEB issued PO No. 2 on March 20, 2017, in which it approved the Motion and granted Mr. Hull intervenor status and cost award eligibility. In addition, the OEB allowed the Kasters the opportunity to file additional information in support of their request for intervenor status and directed the Applicant to file specific information to clarify the evidence. Subsequently, the Applicant filed information that clearly illustrated the location of the proposed transmission line in respect to both the Kasters' and Mr. Hull's properties. This information indicated the Hull property would be affected and the Kasters would not be affected.

The OEB decided to proceed by way of a written hearing. The OEB provided a schedule for filing written questions and answers and written submissions.

Mr. Hull and OEB staff filed submissions on April 27, 2017 and the Applicant filed its reply submission on May 4, 2017.

4 DECISION ON THE ISSUES

4.1 Interests of Consumers with Respect to Pricing

Henvey Inlet submitted that the cost for the proposed Transmission Facilities would be borne by the Applicant and would not affect electricity transmission rates in Ontario.

Finding

The OEB finds that the Applicant has adequately demonstrated the need for the proposed Transmission Facilities, which are required for connecting and transmitting the electricity generated by the HIWEC to the IESO-controlled transmission grid. In addition, the OEB has no concerns related to the proposed Transmission Facilities with respect to the price of electricity service, as all costs related to the proposed Transmission Facilities will be borne by the Applicant and will not be incorporated into Ontario electricity transmission rates.

4.2 Reliability and Quality of Electricity Service

System Impact Assessment (SIA)

The IESO completed a final SIA Report for the HIWEC and connection of the proposed Transmission Facilities dated June 30, 2015. The IESO concluded that the proposed connection of the HIWEC and associated Transmission Facilities will not result in a material adverse impact on the reliability of the integrated power system. The Applicant also received a Notification of Conditional Approval for connection simultaneously with the final SIA Report.

On September 30, 2016, the IESO issued an addendum to the final SIA (SIA Addendum) in response to updated information. At that time, the Applicant requested amendments to the final SIA due to a change in the turbine model, changes to HIWEC's collector system design and modifications to the substation design. The SIA Addendum requires the Applicant to meet all the specific and general requirements in the final SIA Report and additional specific requirements identified in the Connection Applicant Requirements section at pages 2 and 3 of the SIA Addendum. The IESO concluded that, provided the Applicant meets these requirements, the proposed connection, as modified "is expected to have no material adverse impact on the reliability of the integrated power system".

Customer Impact Assessment (CIA)

Hydro One completed a final CIA for the HIWEC and the connection of the proposed Transmission Facilities. Hydro One has advised the Applicant that it has no concerns with the changes made to the original Application pursuant to the requirements outlined in the SIA Addendum and does not need to update the CIA for the amendments to the SIA.

Finding

The OEB finds that the proposed Transmission Facilities will not adversely affect the interests of consumers with respect to the quality or reliability of electrical service, provided the Applicant fulfills the conditions in the SIA, SIA Addendum and CIA.

4.3 Policies of the Government on the Promotion of the Use of Renewable Energy Sources

The Applicant entered into a 20-year Power Purchase Agreement with the Ontario Power Authority, now the IESO, on February 25, 2011. The Application indicates that HIWEC will contribute up to 300 MW of clean, renewable energy to the provincial electricity grid. The HIWEC will further the Ontario Government's policy objective to increase the amount of renewable energy added to the Province's energy supply mix.

Finding

The OEB finds that approval for construction of the proposed Transmission Facilities would be consistent with the policies of the Ontario Government regarding promotion of renewable energy sources in that it would enable transmission of the renewable energy to the provincial electricity grid. The OEB's leave to construct approval is predicated on the need to connect the HIWEC to the provincial grid.

4.4 Forms of Land Agreement

Section 97 of the Act requires that the OEB be satisfied that the Applicant has offered or will offer each landowner affected by the approved route or location an agreement in a form approved by the OEB.

Henvey Inlet filed the forms of land agreements offered or to be offered to the affected landowners with its Application.

In an application seeking approval under Section 97, the OEB reviews the form of agreement filed by the Applicant in order to satisfy itself that the form of agreement, which represents the initial offering to an affected landowner, is acceptable. Once the OEB is satisfied with the initial offering to an affected landowner, the parties are free to negotiate terms to meet their respective needs.

The proposed 103 km 230 kV transmission line and 230 kV switching station require a variety of land agreements, the form of which depends on the nature of the property, current ownership and the interests in land to be acquired, including:

- 1) Privately Owned Land: A total of 75 affected properties. The Applicant indicates the following agreements have been or will be presented: Transmission Easement Option Agreements, Temporary Access Easement Option Agreements, Construction Laydown Ground Leases and Agreement of Purchase and Sale. These Forms of Agreements were provided in Exhibit E, Tab 1, Appendices A, B, D and E.
- 2) Municipally Owned Land: A total of 46 affected properties owned by 4 municipalities. The Applicant indicates the following agreements have been or will be presented: Transmission Easement Agreements (Public), Temporary Access Easement Agreements, and Construction Laydown Ground Lease. These Forms of Agreements were provided in Exhibit E, Tab 1, Appendices C, D and E.

The Applicant advised the OEB regarding its acquisition of necessary rights in respect of “Agency and Utility Owned” lands and the status of its negotiations with the Crown and the Ontario Ministry of Transportation (MTO). It explained that there are 6 agencies and utilities with ownership interests in 69 affected properties. Henvey Inlet requires some of these properties on a permanent basis, some on a temporary basis, and some on both a permanent and temporary basis. The Applicant advised that the forms of agreement to be used to convey such permanent and temporary land rights are generally the standard forms that are customarily used by the agencies and utilities for these purposes and that these will vary from one agency or utility to another and in some cases take the form of a permit.

The Applicant advised that of the 35 affected agency/utility properties in respect of which it requires permanent rights, it has completed and submitted relevant permit applications and/or requested necessary agreements for 6 of these properties thus far and is awaiting receipt of same. It states that it is working toward completing permit

applications and reviewing/requesting agreements with respect to the remaining 29 affected properties. The Applicant advised further that of the 55 affected agency/utility properties in respect of which it requires temporary rights, it has completed and submitted relevant permit applications and/or requested necessary agreements for 3 of these properties and is awaiting receipt of same. Similarly, the Applicant states that it is working toward completing permit applications and reviewing/requesting agreements with respect to the remaining 52 affected properties.

Finally, the Applicant advised that all agencies and utilities with affected properties for which the Applicant seeks land rights (whether permanent or temporary) have been contacted and have received information packages and information necessary to process the request to issue to the Applicant the relevant permits and agreements.

The Application indicates that the forms of agreement are in accordance with the Essential Easement Considerations set out in Appendix A of Chapter 4 of the OEB's *Filing Requirements for Electricity Transmission Applications* (Filing Requirements).

Mr. Hull submitted that he has yet to receive a form of agreement from the Applicant to address the issues he will encounter as an affected landowner. The Applicant indicated in its reply submission that it is in the process of setting up a meeting with Mr. Hull during the second week of May.

Finding

The OEB has reviewed the forms of agreement filed and finds them to be reasonable in the circumstances of this Application. The OEB notes that no landowner has advised the OEB of issues with the form of agreement offered by the Applicant. The OEB approves the forms of agreements provided by the Applicant for the purpose of this Application. This approval does not necessarily imply that the OEB would approve similar forms of agreement in any future proceeding.

The OEB acknowledges that some affected landowners, including Mr. Hull, indicated that they have not yet been offered a form of agreement. As indicated in Section 97 of the Act, the OEB approves the form of agreement which the Applicant "has offered or will offer to each owner of land affected by the approved route or location". The status of the offerings is not considered by the OEB when a decision is issued. However, as the Applicant acknowledges in its final submission, the Applicant needs to secure the necessary land rights from all affected landowners prior to carrying out construction. Again, the OEB notes that matters related to land use, aesthetics, environmental

impacts and property values are not within the OEB's jurisdiction to consider under Section 97 of the Act.

First Nations Land Rights

The Applicant advises that the location of the proposed Transmission Facilities on Reserve lands within the Henvey Inlet Reserve No.2 (North and South Project substations, 8 km 230 kV and 6 km 230 kV transmission line segments), Magnetawan First Nation (5.7 km 230 kV segment) and Shawanaga First Nation (2.2 km 230 kV segment) is a matter that is within the exclusive jurisdiction of all three First Nations, in accordance with the authority delegated to each First Nation by federal statute. The Applicant confirms that it has acquired the necessary land rights for the proposed Transmission Facilities to be located within Henvey Inlet Reserve No. 2 through the Henvey Lease. The Applicant advises that it is currently engaged in discussions with the Chiefs and Councils of both Magnetawan First Nation and Shawanaga First Nation to obtain easements for the proposed transmission line crossing through these reserves.

Finding

The OEB notes that the Applicant has, or is in the process of acquiring, First Nation land rights for the portions of the proposed Transmission Facilities on Reserve lands.

4.5 Section 101 of the Act

The Applicant has applied under Section 101 of the Act for an order approving the construction of certain transmission facilities upon, under or over a highway, utility line or ditch.

With respect to the Transmission Line Routing Agency and Utility Owned properties, the Applicant indicates that it has consulted with 6 agencies and utilities with ownership in 69 affected properties to acquire permanent and temporary land rights. All agencies and utilities with affected properties have been contacted and have received the information necessary to process the Applicant's request to issue the relevant permits and agreements.

With respect to specific MTO requirements, the Applicant filed an email from MTO dated March 3, 2017 that confirms the MTO's commitment to work with the Applicant to ensure the project meets all MTO requirements and conditions. The Applicant

anticipates that upon conclusion of the MTO's review process, the MTO will issue a combination of Encroachment Permits and Leases to the Applicant.

For the portions of the proposed transmission line that will cross utility lines, the Applicant indicated that it will enter into crossing agreements based on the standard forms used by the relevant electricity, telecommunications, rail and gas utilities.

OEB staff submitted that it is satisfied that the Applicant is taking the necessary steps to obtain the necessary permits and agreements for highway and utility crossing required for the proposed Transmission Facilities. OEB staff had no objection to the granting of the requested approval under Section 101 of the Act, subject to a condition that the proposed facilities be constructed in accordance with all necessary permits and agreements issued by, or entered into with, the relevant agencies and utilities. The Applicant submitted that it did not take exception to OEB staff's inclusion of the conditions as a condition of approval under Section 101.

Finding

The OEB understands that the Applicant is taking steps to obtain the necessary permits and agreements issued by, or entered into with, the relevant agencies and utilities. The OEB will approve the Application under Section 101 of the OEB Act for the construction of the proposed Transmission Facilities upon, under or over a highway, utility line or ditch, subject to the Applicant obtaining all necessary permits and entering into all necessary agreements with the owners of the highways, utility lines and ditches upon, under or over which the Applicant intends to construct the Transmission Facilities.

4.6 Municipal Road Use Agreement

The Applicant indicates that there are 4 municipalities (Township of Archipelago, Township of Carling, Township of McDougall, and Township of Seguin) that it will require easements from for rights along or across municipal road ways and have been contacted through in-person meetings, council presentations, email and phone correspondence. The Applicant has presented agreements to 3 municipalities and none have been signed yet. The Applicant intends to rely on its statutory rights under s. 41 of the Electricity Act for some of the municipal properties.

Finding

The OEB is satisfied the Applicant has demonstrated that it is working with each of the Municipalities to execute the necessary Road Use Agreements required for the proposed Transmission Facilities.

4.7 Other Approvals

The Applicant indicates the proposed Transmission Facilities will be constructed and operated in accordance with all applicable technical codes and standards. These codes and standards should include, but not be limited to, the requirements of the Ontario Electrical Safety Code, the Occupational Health and Safety Act, the Transmission System Code and the Market Rules for the Ontario Electricity Market, including those with respect to metering.

4.8 Conditions of Approval

OEB staff proposed that the OEB consider five conditions of approval for the leave to construct application. The Applicant indicated in its reply submission that it had no concerns with the proposed conditions 1, 2 and 5, but took exception to conditions 3 and 4.

Proposed Condition 3

This condition would terminate the Applicant's leave to construct approval on November 1, 2020, approximately 24 months after the planned in-service date, if construction of the Transmission Facilities was not completed by that time. The Applicant argued that condition would be impractical, not consistent with OEB practice and not consistent with OEB jurisdiction under the Act.

Finding

The OEB's mandate under Subsection 23(1) of the Act specifies that the OEB in making an order may impose such conditions as it considers proper.

However, the OEB will not impose condition 3 as proposed by OEB staff. The OEB finds that such a condition is not necessary in this case. The Applicant submitted that it

will bear the entire cost of the project and, as a result, will also bear the financial risk associated with a delay in the construction schedule.

Proposed Condition 4

This condition would require the Applicant to advise the OEB of any proposed material change in the approved Transmission Facilities in respect to the routing, construction schedule, or the necessary environmental approvals, and all other approvals including permits, licences, certificates and rights required to construct the proposed facilities.

The Applicant submitted that this condition is not necessary as section 4.3.3.1 of the OEB's Filing Requirements already establishes a requirement to advise the OEB where there is a material deviation to the approved route following an Order. The Applicant argued that the list of items in proposed condition 4 that would constitute a material change is unnecessarily broad.

Finding

As discussed in the context of proposed condition 3, Subsection 23(1) of the Act allows the OEB to impose such conditions as it considers proper. The OEB finds that the proposed condition 4 is reasonable and is consistent with previous leave to construct approvals¹.

Contrary to what the Applicant submits, material changes are of interest to the OEB and go beyond changes in the approved route. For example, the approved Transmission Facilities include a switching station. In the event that there is a material change to that switching station, reliability and quality of electricity service may be affected and that would clearly be important to the OEB given its jurisdiction in leave to construct applications.

The OEB's Filing Requirements are the minimum to be filed with an Application to inform the OEB in its review. The conditions of approval are part of the OEB's determination on the Application and are not constrained by the Filing Requirements.

The OEB has revised the condition as proposed by OEB staff to include First Nations approvals. The approved conditions of approval are in the Order section of this Decision and Order.

¹ See for example, SP Belle River Wind LP Decision and Order (EB-2016-0008); wpd White Pines Wind Incorporated (EB-2016-0268).

4.9 Issues raised by Mr. Hull

Mr. Hull raised two main issues in his submission. One issue is related to the fact that he had not yet received the form of land agreement from the Applicant. The second issue related to environmental considerations in respect of his land.

Finding

The OEB's findings with respect to the forms of agreement are in section 3.4 of this Decision and Order.

The OEB finds that the issues raised by Mr. Hull related to environmental considerations, health and safety issues, or government policies which are unrelated to the promotion of the use of renewable energy sources are all beyond the scope of the OEB's jurisdiction as set out in section 1.2 of this Decision and Order.

5 IMPLEMENTATION

The OEB finds that the proposed Transmission Facilities are in the public interest and therefore grants Henvey Inlet leave to construct pursuant to Section 92 of the Act. The OEB approves the forms of agreements offered to landowners pursuant to Section 97 of the Act.

The OEB's approval is subject to conditions set out in the Order section of this Decision and Order.

The OEB finds it appropriate to make provision for a cost claim process at this time.

6 ORDER

THE ONTARIO ENERGY BOARD ORDERS THAT:

1. Henvey Inlet Wind LP is granted leave pursuant to Section 92 of the Act to construct the proposed Transmission Facilities in accordance with the OEB's Decision in this proceeding and subject to fulfillment of the requirements of the SIA, SIA Addendum and CIA and all other necessary approvals, permits, licences and certificates required to construct, operate and maintain the proposed Transmission Facilities.
2. Unless otherwise ordered by the OEB, authorization for Leave to Construct shall terminate on May 18, 2018, unless construction has commenced prior to that date.
3. The OEB approves the forms of agreement offered to landowners by Henvey Inlet Wind LP pursuant to Section 97 of the Act.
4. Henvey Inlet Wind LP is granted leave pursuant to Section 101 of the OEB Act for the construction of the proposed Transmission Facilities upon, under or over a highway, utility line or ditch, subject to the Applicant obtaining all necessary permits and entering into all necessary agreements with the owners of the highways, utility lines and ditches upon, under or over which the Applicant intends to construct the Transmission Facilities.
5. Henvey Inlet Wind LP shall advise the OEB of any proposed material changes in the construction schedule or the necessary environmental assessment approvals, including the Environmental Assessments, First Nations approvals and all other approvals, permits, licences, certificates and rights required to construct the proposed Transmission Facilities.
6. Mr. Hull shall file with the OEB no later than June 1, 2017 his cost claim in accordance with the OEB's Practice Direction on Costs Awards.
7. Henvey Inlet Wind LP may object to the cost claim no later than June 8, 2017 by filing a submission with the OEB and delivering a copy to Mr. Hull.

8. If an objection to the cost claim by Mr. Hull is filed by Henvey Inlet Wind LP, Mr. Hull will have until June 15, 2017 to file a reply submission to the OEB, with a copy to Henvey Inlet Wind LP.
9. Henvey Inlet Wind LP shall pay the OEB's costs incidental to this proceeding immediately upon receipt of the OEB's invoice.

DATED at Toronto May 18, 2017

ONTARIO ENERGY BOARD

Original Signed By

Kirsten Walli
Board Secretary