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February 10, 2015

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
2nd Floor, West Tower
Washington, D.C. 20005

Re: Formal Case No. 1116

Dear Ms. Westbrook-Sedgwick:

Enclosed please find the Ninety Day Supplement to the Joint Underground Infrastructure Improvement Projects Plan of Potomac Electric Power Company and the District Department of Transportation in the referenced proceeding.

The referenced Ninety Day Supplement to the Joint Underground Infrastructure Improvement has been uploaded into e-Bridge for your review. For a user name and password, please contact Rodney Q. Coffey at RQCoffey@pepcoholdings.com

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink that reads "Andrea H. Harper".

Andrea H. Harper

AHH/mda

Enclosures

cc: All Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Ninety Day Supplement to the Joint Underground Infrastructure Improvement Projects Plan of Potomac Electric Power Company and the District Department of Transportation was served this 10th day of February 2015 on all parties in Formal Case No. 1116 by electronic mail.

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**BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

IN THE MATTER OF

APPLICATIONS FOR APPROVAL OF)	
TRIENNIAL UNDERGROUND)	Formal Case No. 1116
INFRASTRUCTURE IMPROVEMENT)	
PROJECTS PLAN)	

**NINETY DAY SUPPLEMENT TO THE JOINT UNDERGROUND
INFRASTRUCTURE IMPROVEMENT PROJECTS PLAN OF POTOMAC ELECTRIC
POWER COMPANY AND THE DISTRICT DEPARTMENT OF TRANSPORTATION**

Pursuant to Section 34-1313.18(b) of the District of Columbia Official Code (“D.C. Code”)¹ and Public Service Commission of the District of Columbia (“Commission”) Order No. 17697,² as clarified in Order No. 17770,³ Potomac Electric Power Company (“Pepco”) and the District Department of Transportation (“DDOT”) (collectively, “Joint Applicants”) hereby submit this update providing the timing (“Projects Schedule”) and other supplemental information for the Joint Underground Infrastructure Improvement Projects Plan within 90 days of the issuance of Order No. 17697 (“Ninety Day Supplement”) as part of the District of Columbia Power Line Undergrounding (“DC PLUG”) initiative.

I. REQUIREMENTS OF SECTION 34-13.18(B) OF THE D.C. CODE

Section 34-1313.18(b) of the D.C. Code states that “Within 90 days after the Underground Infrastructure Improvements Projects Plan is approved by the Commission, the

¹ Section 34-1313.18(b) correlates with Section 308(b) of the Electric Company Infrastructure Improvement Financing Act of 2014 (“Act”).

² *In the Matter of the Application for Approval of Triennial Underground Infrastructure Improvement Projects Plan*, Formal Case No. 1116, Order No. 17697 (Nov. 12, 2014) (“Order No. 17697”).

³ *In the Matter of the Application for Approval of Triennial Underground Infrastructure Improvement Projects Plan*, Formal Case No. 1116, Order No. 17770 (Jan. 22, 2015) (“Order No. 17770”).

electric company and DDOT shall identify the estimated start date and projected end date for each project approved in the plan.”⁴ Attachment A to the Ninety Day Supplement (“Attachment A”) contains the Projects Schedule. The Projects Schedule identifies the estimated start date and projected end date for the construction of each selected feeder approved in Order No. 17697. Attachment B to the Ninety Day Supplement contains the Projects Plan Timeline, which presents a graphical depiction of engineering design and construction activities for each feeder.⁵ Finally, Attachment C to the Ninety Day Supplement (“Attachment C”) contains the underlying detailed schedules from which the estimated start and projected end dates were derived. The estimated start date in Attachment A corresponds to the milestone “Civil Construction Activities” start date in Attachment C.⁶ The projected completion date in Attachment A corresponds to the milestone “Electrical Construction Substantially Complete” date in Attachment C.⁷ Additionally, the column labeled “Predecessor” in Attachment C identifies the precedent step for each task in the detailed schedules.

Section 34-1313.18(b) of the D.C. Code also states that, in determining the construction estimated start and projected end dates, the Joint Applicants shall consider certain secondary criteria, including:⁸

(1) The ability to coordinate the DDOT Electric Company Infrastructure Improvement Activities with DDOT roadwork and other projects that involve disruption to and subsequent restoration of road surface or that otherwise

⁴ See also, Order No. 17697 at P 240.

⁵ Please note that due to the constraints of the software used to produce the graph in Attachment B, any task that begins during a given month is shown as if it begins on the first of that month. Similarly, any task that ends in a given month is shown as if it ends on the last day of that month.

⁶ For example, see line 45 in Attachment C for the estimated start date for Feeder 308.

⁷ For example, see line 87 in Attachment C for the projected finish date for Feeder 308.

⁸ D.C. Code § 34-1313.08(b)

impede the flow of traffic along the roadway where the undergrounding work is to occur;

(2) The estimated economic value or other benefits to be gained by the electric company's customers from the projected reductions in outage frequencies and durations when the Electric Company Infrastructure Improvements are completed; and

(3) For Electric Company Infrastructure Improvement Activity involving a cross-jurisdictional feeder circuit, a showing of the means by which the electric company has storm-hardened its distribution system or has otherwise improved the resilience of service to its District customers on the cross-jurisdictional feeder with respect to major service outage events occurring outside the District's boundaries on the portion of the cross-jurisdictional feeder located outside of the District.

A. Coordination with DDOT Roadwork and Other Projects

Pepco and DDOT worked collaboratively to develop the Projects Schedule and underlying detailed schedules presented in this filing. In an effort to coordinate DC PLUG activities with DDOT roadwork, the Joint Applicants relied on the six-year Transportation Improvement Program (“TIP”) for the National Capital Region.⁹ The TIP is a 6-year financial program that describes the schedule for obligating federal funds to state and local projects. By sequencing DC PLUG projects as detailed in this filing and coordinating with planned DDOT roadwork, Pepco and DDOT expect to reduce disruption to the road surfaces and minimize

⁹ Transportation Improvement Program for the National Capital Region FY2015-2020. National Capital Region Transportation Planning Board. Approved October 15, 2014. Available at <<http://www.mwcog.org/clrp/projects/tip/fy1520tip/FY15-20TIP-11072014.pdf>>

impediments to the flow of traffic along the roadways where the work is scheduled to occur. Such coordination also ensures that the Joint Applicants obtain maximum synergies with other projects being performed within the District of Columbia.

B. Estimated Economic Value

In addition to the coordination with planned DDOT projects, the Joint Applicants considered the economic value to be gained from placing feeders underground as they developed the Projects Schedule.¹⁰ Generally, the Joint Applicants sequenced construction projects to coordinate with other DDOT projects, realize the most reliability gains as quickly as possible, minimize disruption to the residents and businesses in the area and realize the economic benefits of reduced outages as quickly as possible.

C. Storm Hardening of Cross-Jurisdictional Feeders in the Triennial Plan¹¹

A small subset of DC PLUG feeders serve customers in both Maryland and the District of Columbia. As the Joint Applicants prioritized the construction of those feeders, they considered the outside-the-District storm hardening efforts that were expected to take place on those feeders prior to construction. The underlying detailed schedules from which the estimated start and projected end dates were derived (contained in Appendix C) include a date by which Pepco will provide the Commission with a showing of the means by which Pepco has storm-hardened the portion of the cross-jurisdictional feeder located outside of the District of Columbia. For example, Pepco will provide outside-the-District storm hardening techniques for Feeder 308 to the Commission by March 23, 2015 (see line 13 of Attachment C).

¹⁰ For further discussion regarding the feeder selection process, please see the Joint Applicants' Triennial Plan at 5.

¹¹ *Joint Application of the Potomac Electric Power Company and the District Department of Transportation for the Approval of the Triennial Underground Infrastructure Improvement Projects Plan*, Formal Case No. 1116 (Jun. 17, 2014) ("Triennial Plan").

II. REQUIREMENTS OF ORDER NO. 17697

In Order No. 17697, the Commission identified design and construction drawings that it expects to receive for each feeder scheduled to be placed underground and the date by which it expects to receive them.¹² In Order No. 17770, the Commission clarified that the Joint Applicants may provide those design and construction drawings on or by the dates contained in the “Detailed Feeder-Specific Schedules” that are submitted for Commission review in this filing, with the exception of certain information regarding distribution automation (“DA”), as discussed further below.¹³ Each of the documents and review opportunities listed in Attachment A to Order No. 17697 and the date by which the Joint Applicants expect to be able to provide them to the Commission is specifically identified in the underlying detailed schedule contained in Attachment C to this filing (with one exception, discussed later).

The detailed schedules in Attachment C are as of February 10, 2015. Because the Joint Applicants filed some of the deliverables listed in the detailed schedules (lines 5 through 8) along with the Triennial Plan on June 17, 2014, some of the dates in Attachment C occur in the past. All dates in Attachment C prior to February 10, 2015 represent actual historical dates or milestones. Similarly, the Joint Applicants have already begun work on Feeders 308 and 14261. Thus, some of the task durations shown on the detailed schedules for those two feeders are not consistent with task durations for the other 19 feeders.

Feeder 14093 provides an illustration of how the detailed schedules in Attachment C correspond to the documents listed in Order No. 17697. Order No. 17697 directed the Joint Applicants to submit “Design and Construction Drawings of utility civil and electrical facilities.” Accordingly, Attachment C shows that for Feeder 14093, Pepco and DDOT expect to “Provide

¹² Order No. 17697 at Attachment A.

¹³ Order No. 17770 at P 19, 20.

Design and Construction Drawings of Utility Civil Facilities to DC PSC” on March 21, 2016 (see line 31).¹⁴ The Commission will then have 30 days to review those materials at the same time and for the same duration as the utilities’ review period for the same materials. Accordingly, Attachment C shows that the “DC PSC’s Review of Civil Design and Construction Drawings [is] Due” on April 20, 2016 (see line 32). Attachment C also shows that Pepco and DDOT will “Provide Design and Construction Drawings of Electrical Facilities to DC PSC” on October 18, 2016 (see line 69). After a 30-day Commission review period for the electrical designs, Attachment C shows that the “DC PSC’s Review of Electrical Design and Construction Drawings [is] Due” on November 17, 2016 (see line 70).

Order No. 17697 also lists “Electrical Load Flow and Short Circuit Analysis” among the required documents. Attachment C shows that, for Feeder 14093, Pepco will provide “Load Flow and Short Circuit Analyses to DC PSC” on June 10, 2015—shortly after Pepco completes those analyses (see line 13). Attachment C also shows that the Joint Applicants will “Provide Outside-the-District Storm Hardening Techniques” at that time (see line 13).

Attachment A to Order No. 17697 listed three additional documents: (1) Traffic Control Plan Design, (2) Bill of Materials with manufacturer specifications and associated costs and (3) Project Management and Pepco’s Acceptance of Work Plan. Attachment C shows that for Feeder 14093, the Joint Applicants expect to provide traffic control plans to the Commission on July 8, 2016 (see line 34). Similarly, Attachment C shows that Pepco will provide the civil bill of materials to the Commission on July 8, 2016 (see line 35) and will “Provide Electrical Bill of Materials to DC PSC” on October 18, 2016 (see line 71). Finally, Attachment C shows that for Feeder 308, Pepco and DDOT will “Provide Project Management and Pepco's Acceptance of

¹⁴ Pepco and DDOT provided the design drawings of utility civil facilities for Feeder 308 to the Commission on January 30, 2015.

Work Plan to DC PSC” on July 8, 2016 (see line 33).

III. DISTRIBUTION AUTOMATION

The Commission noted in Order No. 17770 that the Joint Applicants can learn “from the experience other utilities have gained from installing [DA] functionalities in their electric distribution systems.”¹⁵ The Commission also pointed out in Order No. 17770 that its review of Pepco’s Undergrounding Technology Enhancement Project Request for Proposals (“RFP”) (RFP #2014-PS-Pepco-18)¹⁶ “did not identify any non-standard requirement that would require specialized procurement that may significantly delay deployment of DA technology on the underground feeders.”¹⁷ However, Pepco’s standards require that devices are tested, certified and rated to withstand electrical current up to 40kA. Pepco’s research has shown that the devices that comprise the limited number of underground DA systems currently in operation around the United States have not been tested, certified and rated to withstand electrical current up to 40kA. Therefore, those devices do not meet Pepco’s current system standard. For this reason, Pepco must carefully examine the DA RFP responses before it determines a way forward. Until that time, the Joint Applicants intend to design each feeder so that DA devices and technologies can be deployed and implemented at minimal additional cost after the feeders have been placed underground.

In Order No. 17697, the Commission listed “Distribution Automation/Fault Location Techniques Design, evaluation of fiber optic communication capabilities” among the design and construction drawings it expects to receive for each feeder scheduled to be placed underground.¹⁸

¹⁵ Order No. 17770 at P 22.

¹⁶ Pepco’s Response to Staff DR No. 4-5, Formal Case No. 1116 (DR 1116-2014-E-59).

¹⁷ Order No. 17770 at P 22.

¹⁸ Order No. 17697 at Attachment A.

However, in Order No. 17770, the Commission clarified that it expected the Joint Applicants to “propose a timeline to provide the Commission with ‘DA/Fault Location Techniques Design, [and] evaluation of fiber optic communications capabilities’ for all selected feeders and parallel feeders identified in the Triennial Plan.”¹⁹ As the Commission noted in Order No. 17697, Pepco issued an RFP on September 10, 2014. At this time, Pepco is still analyzing the responses to this RFP and has not yet awarded a contract. Pepco expects to complete its analysis and identify the most cost-effective DA design and equipment solution for the DC PLUG initiative during the fourth quarter of 2015. Pepco may award one or more bidders a contract thereafter. Before that time, Pepco will provide a status update on its decision regarding DA during the semi-annual meeting between Pepco, DDOT, OPC and other parties, as outlined in the Joint Stipulation, which is to be held by May 12, 2015 (six months after the Commission’s approval of the Triennial Plan).²⁰ Once Pepco has finalized its DA strategy, it will file with the Commission a summary and description of its DA designs and equipment.

IV. ADDITIONAL CONSIDERATIONS FOR THE PROJECTS SCHEDULE

A. Formulation of Underlying Detailed Schedules

The Projects Schedule and underlying detailed schedules presented in the Ninety Day Supplement represent the Joint Applicants’ best estimate of the amount of time required for design and construction of the selected feeders scheduled to be placed underground in the first Triennial Plan. Pepco and DDOT used their expertise in electrical and civil design and construction to develop the sequencing and durations of each task listed in the detailed schedules. One of the largest drivers of each feeder’s civil construction duration is the number

¹⁹ Order No. 17770 at P 22.

²⁰ *Joint Stipulation of the Office of the People’s Counsel, Potomac Electric Power Company, and the District Department of Transportation Resolving Recommendations 1-13 and 16-25 of the Protest of the Office of People’s Counsel in Formal Case No. 1116 (“Joint Stipulation”)* at 3 (Sept. 15, 2014).

of crews working on that feeder. To estimate the duration of civil construction for each detailed schedule in Attachment C, the Joint Applicants projected that for each 9,000 linear feet of each feeder, an average of four eight-person crews will be working on the feeder for the entire duration of civil construction (up to a maximum of 20 crews per feeder at one time). This arrangement is intended to allow construction to progress steadily while minimizing congestion in the neighborhoods where construction is taking place. Additionally, the detailed schedules in Attachment C assume that construction work will not take place on federal holidays or weekends. Throughout the DC PLUG initiative, Pepco and DDOT will continue to look for ways to optimize the Projects Schedule.

B. Changes to the Projects Schedule and Underlying Detailed Schedules

The Joint Applicants developed the Projects Schedule in Attachment A using the assumption that construction activities will involve placing the entirety of the main line primary and lateral sections of the selected feeders underground. Therefore, a change in scope or requirements of the initiative may result in a concurrent change to the construction schedule. For instance, Pepco and DDOT have committed to consider (among other things) the use of pad-mounted transformers wherever possible to minimize cost.²¹ In order to install pad-mounted transformers in certain locations, Pepco may need to coordinate with property owners to acquire public utility easements (if pad-mounted transformers are sited on private property) or DDOT (if pad-mounted transformers are sited within the public space). Coordination of activities such as these may extend the construction schedule and alter the Projects Schedule filed herein. Additionally, much of the DDOT activity cannot occur until the District has final, non-appealable orders from the Commission allowing it to issue the bonds to fund a portion of the

²¹ Joint Stipulation at 4.

DC PLUG initiative. The Joint Applicants currently estimate that the District's bond issuance will close on August 1, 2015. The underlying construction schedules for all selected feeders except Feeder 308 have been formulated on that basis. Should the date of issuance change, the Projects Schedule and underlying detailed schedules would change accordingly. Finally, unforeseen circumstances, such as severe weather or other disruptions, may adversely impact the construction schedule.

The Joint Applicants will notify the Commission of any change to the Projects Schedule through the required annual construction update reports²² and reports on the parties' semi-annual meetings.²³

C. Feeders 308 and 14261

The Joint Applicants are moving forward with the design and construction of Feeders 308 and 14261, as discussed in prior filings.²⁴ Funding for Pepco's portion of the design and construction of Feeders 308 and 14261 will come from the Underground Project Charge, once implemented. Funding for DDOT's portion of the design of Feeders 308 and 14261 and construction of Feeder 308 will come from DDOT's appropriated budget rather than bond issuance funds. The Projects Schedule in Attachment A reflects the fact that the Joint Applicants will begin the design of Feeders 308 and 14261 and construction of Feeder 308 well in advance of the design and construction work for the other feeders in the Triennial Plan.

V. CONCLUSION

The Joint Applicants respectfully submit the Ninety Day Supplement for Commission

²² Electric Company Infrastructure Improvement Financing Act of 2014, § 307(b).

²³ Joint Stipulation at 3.

²⁴ See, e.g., *Joint Response of Potomac Electric Power Company and the District Department of Transportation to the Protests of the Apartment and Office Building Association of Metropolitan Washington and the Office of the People's Counsel*, Formal Case No. 1116, at 4 (Aug. 25, 2014).

review. With the submission of the Ninety Day Supplement to the Commission within 90 days of the issuance of Order No. 17697, the Joint Applicants have fulfilled the requirements of Section 308(b) of the Act.

POTOMAC ELECTRIC POWER COMPANY

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ATTACHMENT A

PROJECTS SCHEDULE

DC PLUG First Triennial Plan Projects Schedule

<u>District of Columbia Ward</u>	<u>Feeder</u>	<u>Estimated Start Date</u>	<u>Projected End Date</u>
3	308	6/29/15	6/2/16
7	14261	10/8/15	9/20/16
7	368	7/11/16	6/30/17
3	75	7/12/16	6/8/17
5	14093	9/19/16	10/11/17
4	15001	10/31/16	10/19/17
8	15177	12/5/16	3/29/18
3	394	3/10/17	1/31/18
5	14008	3/10/17	4/26/18
4	15021	4/7/17	4/5/18
7	15707	7/10/17	11/6/18
3	467	8/9/17	6/5/18
8	14758	8/10/17	9/14/18
5	15701	8/10/17	11/23/18
3	14766	4/9/18	3/15/19
5	14014	4/9/18	6/4/19
3	14136	4/9/18	11/13/18
5	15013	7/13/18	7/19/19
7	15130	8/10/18	8/8/19
8	15166	8/10/18	9/9/19
3	15944	11/1/18	9/19/19