STATE OF VERMONT DEPARTMENT OF PUBLIC SERVICE

VERMONT COMPREHENSIVE ENERGY PLAN

October 13, 2015 7:10 p.m.

2 Educational Drive Essex Junction, Vermont

Public Hearing held before the Vermont Department of Public Service, at the Essex High School, 2 Educational Drive, Essex Junction, Vermont, on October 13, 2015, beginning at 7:10 p.m.

PRESENT

DPS Staff: Asa Hopkins, Director of Planning and

Energy Resources

Jon Copans, Deputy Commissioner

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DR. HOPKINS: Patty Rainville and Sally 1 2 Collopy. Apologies in advance to all the things I do 3 to your names, and just for in the hole is Henry Sorry. Thanks, and we'll go from there. 4 5 three minutes and Patty Rainville. MS. RAINVILLE: I don't have a question. 6 7 I wanted to have the opportunity if I had a question and I don't. 8 9 DR. HOPKINS: All right. We will jump 10 on to the next. So Sally Collopy. Thank you. MS. COLLOPY: Sally C-O-L-L-O-P-Y. 11 12 I'm looking at page 295 of the Comprehensive Energy 1.3 Plan and I'm not really sure what that means. does it mean if the plan is adopted will there be a 14 stay on any new wind projects until it's done because 15 under strategy 2 is learn from existing wind --16 in-state wind projects to improve the siting and 17 18 review requirements and processes for future wind development. So does that mean -- what does that 19 20 mean exactly? 21 DR. HOPKINS: We'll try to make it more 22 clear just to clarify. 23 MS. COLLOPY: But I do have a suggestion 24 too.

DR. HOPKINS: Just for clarity it's not

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Q&A. I'm not going to engage in back and forth.

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MS. COLLOPY: Okay. Under number 2 on page 295 under strategy 2 under the recommendations I want to comment that you remove the word consider and make it mandate to do those health assessments — health impact assessments now post construction at all operating projects and preconstruction at all proposed projects, and so that's my comment and I'm actually quite surprised to see it in there. Happy, and I hope it actually means something. Thank you.

DR. HOPKINS: Thank you. So next Henry and then Jonathan Dowds.

MR. BONGES: My name is Henry
B-O-N-G-E-S. I'm a resident of Milton, Vermont. I'm
here to comment on your 2015 Comprehensive Energy
Plan draft, 401-page document which I have reviewed
but not read every page. It's a lot of material to
comment on.

My specific concern is lack of a carbon tax. The plan refers to the Total Energy Study that draws the conclusion that price signals are sufficient to reduce carbon consumption and market policies such as carbon tax are not needed. There's also concern expressed such a tax would be regressive. I ask a carbon tax to be reconsidered.

Books such as the Benefit and Burden, on tax reform, by Bruce Bartlett, and Thomas Piketty's book Capital in the 21th Century laud taxing what is bad versus what is good. I expect they would both support a carbon tax, but I don't recall such being specifically mentioned. People respond to price, though short term memories. Just look at the Winnebago sales and gas prices since the 70's.

People have a six-month memory at best.

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Regarding the carbon tax being regressive, so is the lottery and cigarette taxes, both highly regressive. The carbon tax would better prepare all Vermonters for rising energy prices, from which we are currently shielded by massive government subsidies to reduce the cost of carbon based energy. Gas is approximately five and a half dollars a gallon in France and the United Kingdom and it's half of that in Vermont. Shielding Vermonters from the true cost of energy will only hurt those not taking actions to reduce their carbon footprint.

The carbon tax will spur innovation, as seen by industry response to ozone and CFCs. The carbon tax should be readily implemented, one of its main advantages, and financially motivate every generator of carbon emission to reduce them.

As one who actively promotes home energy retrofits, mass transit, biking, renewable energy, and local food I know firsthand people respond to dollars. People are not altruistic by nature, largely with the attitude that if something is not hitting them or their wallet today, then they will worry about it tomorrow. Broad based behavior change is needed, as noted by Commissioner Copans, and carbon tax is the best way to achieve that behavior change. Some pain needs to be felt today as there will be a lot of pain tomorrow.

The carbon tax can help correct the broken link between energy source and costs and better prepare all Vermonters for a future without plentiful subsidized carbon based energy.

MS. COLLOPY: Can I go back if I have time left?

DR. HOPKINS: Let's see where we stand when we have gotten through everybody. If you do have something written up, as this gentleman did, it can be very helpful to the court reporter so -- and also if you have something, time runs out and your last paragraph didn't get in there, happy to get it to the court reporter and get the rest of it into the record so we can review it. So Jonathan Dowds and

then Carol Geske.

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MR. DOWDS: I'm Jonathan D-O-W-D-S. I would like to thank the DPS for having this public comment period. I think overall the goals are highly laudable. I would like to echo the comments of a few other folks here tonight who said it's important to have some things that help steer people's decision making, and that largely that is probably going to be either pricing based or a strict regulatory approach. I would encourage the agency to consider making a stronger more explicit push for that in the Comprehensive Energy Plan.

Finally, on the matter of biofuels the carbon intensities of these fuels varies a lot depending on the technologies that are used to produce them, the land on which the crops are grown. So I would encourage also an explicit mention of fuel carbon intensities and then recognition that can change over time and not to be considered on an ongoing basis.

DR. HOPKINS: Carol Geske and then Steve Lefkovitz.

MS. GESKE: It's Carol and it's

G-E-S-K-E. I'm kind of just going to go down my list

of things. I'm a big supporter of renewables. I'm

quite concerned I guess what kind of world we're passing down to our kids. Concerns about climate change. I have heard also a lot of apprehension and even a bit more than that about the wind turbines, and I'm not really sure where -- what the facts are with that. I just know that there's a lot of local folks who are really upset and feeling that their lives and lifestyle will be directly impacted by those.

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So I guess my comment would be to listen to the locals and also to get the rest of us maybe a little bit more educated about what's going on because I don't know, you know, what is really going on with the turbines. I support the carbon tax also and just for general information for folks looking into the future I know someone right now who runs their car, their Prius, their Toyota Prius totally free. They put panels on their house. They have a plug-in. They plug it in and they are able to get to work and get errands done.

The Prius I've got one, but you don't get, you probably know, a lot of miles out of the charge, but I guess I wanted people to know that the solar panels are feasible. And then when you get to questions I've got a question about how much the

subsidies for renewables are as compared to the fossil fuels, the coal, oil, and natural gas.

Thanks.

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DR. HOPKINS: Steve Lefkovitz and then Newt Garland.

MR. LEFKOVITZ: Hi. My name is Steve Lefkovitz. L-E-F-K-O-V-I-T-Z. The federal solar tax credit is due to expire on 1-1-17, and I think the state should step in to replace this tax credit with a local tax credit spread out maybe over ten years against the local property taxes. Solar panels will increase the value of the property and increase the tax base of the locality and we've built a huge solar industry in Vermont, as I'm told about 2,000 jobs in the solar industry, and with a 30 percent tax credit evaporating that industry would disappear. It would be just the same as cutting half the jobs at IBM in Essex here.

That's firstly, and secondly, there's between 1,000 or 1,500 active and inactive dams in Vermont that at one time or another had clean renewable source of energy from these dams, and I think hydro power is a good opportunity to explore that, and I know it's very costly to clean up the rivers behind the dams, but the state should

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investigate federal funds to assist with these clean-ups and get this clean renewable hydro power online. Thank you.

DR. HOPKINS: Newt Garland and then Ned Farquhar.

MR. GARLAND: I'm Newt Garland
G-A-R-L-A-N-D and I pay my taxes. I'm a grandfather
and I care about the future and I think the future
depends on our reducing fossil fuel usage. That's
the most important thing that we could do. So I
would like to see more discussion and perhaps a
recommendation in the energy plan for a carbon
pollution tax. I think that's the most effective way
to reduce -- to get the population to reduce the fuel
usage. Thank you.

 $$\operatorname{\textsc{DR}}$.$ HOPKINS: Ned Farquhar and then Jerry Mullen.

MR. FARQUHAR: Hi. My name is Ned

Farquhar F-A-R-Q-U-H-A-R and I'm from Vermont Gas,

and I just want to say quickly that gas can be a very

quick and affordable way to reduce carbon and make

clean energy affordable or available to more people.

We have 50,000 -- almost 50,000 customers right now

in Vermont all in northwest Vermont. By using

efficiency programs and displacing oil and propane

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they save -- prevent emissions equivalent to about 10 percent of Vermont's VMT and that's just in two counties.

So we believe it would be a good thing to restore recommendations made in the 2011 plan about making gas available to more people. We also think it's a great idea to have a lot of heat pumps out there, but you might not be able to cover the whole state, and we want to play an important part in Vermont's clean energy future.

The opportunities out there are significant to help lower income and fixed income people with their energy costs which can be very high, especially with propane right now, and our energy efficiency programs are really good and can help a lot of those people as well. So thank you for your time and we recommend restoring the recommendations in the 2011 plan. Thank you.

DR. HOPKINS: Jerry Mullen and then James Benson.

MR. MULLEN: I'm Jerry Mullen
M-U-L-L-E-N, West Bolton, Vermont where I was a
selectman for 15 years. I taught the environmental
study program in Burlington High School from 1971 to
1994. So I was very, very interested in and got to

be somewhat knowledgeable about this topic, and I'm really glad to see all these things starting to come to pass. However, last year when I was running for the Legislature I kept hearing from people all over that they were being taxed out of their homes. So when I first heard about carbon taxes I got to thinking holy cow one more tax, how can people stand that. Then I got to thinking two years ago we put 32 solar panels on our roof. I figure they are going to pay for themselves in 8 years and they have a lifetime of 20. So it looks like a pretty good deal. We have put out as of sunset today 18,500 kilowatthours. I have been getting electric bills since April which say credit do not pay.

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If you have a carbon tax I think people, especially low income people, are going to have a good benefit out of this. Now I could not have done this without some subsidies of getting these and that's going to be important, but maybe the carbon tax can help pay for that.

One other thing I would like to mention. Some of you may remember the oil embargo of 1973 when some countries that didn't like what the United States was doing stopped oil shipments and brought the country to a dead halt. At the time I was

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finishing up the Air Force command at Staff College and it seemed as if the lesson of that was that any country that presumes to be a major power is not — is just in delusion if it doesn't control its own energy and this is a way to stay a major power. Thank you.

DR. HOPKINS: James Benson and then Steve Comeau.

MR. BENSON: James Benson B-E-N-S-O-N
Shelburne, Vermont. Director Hopkins, Members of the
Selectboard, Ladies and Gentlemen, my comment is
regarding a net metering power permit which I
submitted in March. I attended a Selectboard meeting
in Shelburne and planning and zoning meeting as well.
All of the permit process and attending these
meetings was very time consuming. A member of the
Selectboard made a comment that my permit was very
complete and accurate and that he had seen many of
these permits before.

I live in an area that is zoned for agricultural use. I submitted my permit seven months ago and I've not heard on the status. I've called ten times leaving voice messages with no replies. My comment is how can I help you meet your Vermont Comprehensive Energy Plan when I can't get any

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information on the status of my permit. Thank you.

DR. HOPKINS: Steve Comeau and then Bob

MR. COMEAU: Steve Comeau C-O-M-E-A-U.

My comments are on the -- primarily on the Section

4.1 Total Energy Consumption Today. Section 4.1 of
the plan. It's important to understanding the
progress to which renewables are the historical trend
of the renewable percentage in the fuel mix breakdown
of the renewals.

The charts in exhibit 4-2 on page 28 are very unclear and barely readable. The solar is lumped in as solar, methane, et cetera. Solar should be in a separate section of the pie chart as it is normally considered the best example of new renewable energy.

The charts in exhibit 4-2 show consumption counted before REC sales or purchases. It does not explain or justify in the section of the plan how renewable energy can be counted as part of the renewable energy mix if the RECs are sold out of state. For example, wind is claimed at 4 percent and Green Mountain Power's web site shows wind at 0 percent after the RECs are sold. So it seems that most wind energy currently should not be counted as

renewable in Vermont if the RECs are sold out of state.

The renewable energy sources are described but the description is unclear, and there is no chart showing the percentage allocations or renewable energy sources. There's also no historical trend of renewable energy totals or the trend of the separate sources.

There was a discrepancy between what was described tonight as 20 percent -- 16 percent is the current percentage of total energy that is renewable in Vermont, but on page 26 it says currently renewable energy makes up less than 20 percent of Vermont's total consumption of energy. Now 16 percent is less than 20 percent, but the implication is here that one would think that the goal -- that the current status is about 20 percent. So I think this whole Section 4.1 for a normal reader is very unclear, it's very hard to follow, and it's the most critical section of the report because that's where it really lays out the percentage of electricity -- of energy that is renewable in Vermont. Thank you.

DR. HOPKINS: Bob Buermann and then Steve Crowley.

MR. BUERMANN: Bob Buermann

B-U-E-R-M-A-N-N, South Hero. I'm a member of the Grand Isle County Energy Committee and the Northwest Regional Planning Commission Energy Committee which is one of your three regions working on our regional methodology. A couple comments.

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First off I am in support of the 90 percent by 50 when we consider it is part of a local generation and local usage. What's behind that is the previous plan cites small distributed energy generation partly to reduce any need for expansion of the power lines or new power lines. What we've seen over the last couple of years and being proposed over the next one or two years is actually large generation plants which require new lines. For example, the three power lines going down the lake, the northeast corridor line, and in fact even the Lowell Mountain line to connect to Jay was also a larger expansion. So we're seeing, as we do in these larger generation plans, we're actually causing more construction and we're not getting the power where it really needs to be used. So I want to encourage ways to incentivize developers for doing smaller projects near where we need the power as opposed to large projects that are sending it down to Massachusetts and New York and Connecticut and New Jersey and

everywhere south of us.

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My other concern is related to public transportation. I asked you earlier about a question for vehicle miles traveled. I'm also on the CCTA board. So I like to strongly encourage when you look at your large usage of transportation in fact our largest carbon impact appears to be transportation. We keep talking about the electricity. We've got to find a way to get more public transportation in our little part of the state. Thank you.

DR. HOPKINS: Steve Crowley and then Jane Stromberg.

MR. CROWLEY: Hi. Steve Crowley

C-R-O-W-L-E-Y. Well thanks for the opportunity to be here and enter some comments tonight. I think the plan is really exciting. There's so many things going on in Vermont. It really is just exciting to look at all that and see how much quality work is happening.

As I look through the plan, though, I keep feeling like it needs a stronger sense of urgency. You know climate change has been increasing more rapidly in recent years. The facts of climate change, the storms, the fires, and what's in the pipeline for climate change is there and it's going

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to be coming at us even faster. So there really isn't time to gradually work into these reductions. Every opportunity should be taken to strengthen the plan.

I think there are lots of opportunities. The shortened timelines to deploy renewables around the State of Vermont to avoid future fossil fuel infrastructure that's going to commit us to increase emissions for decades. I think the carbon tax is a critical tool in making this happen.

For one, you know, gradual increase over a decade would provide the consumer signals and would gradually change a lot of the choices people make, and although proposals out there are mostly revenue neutral it could also generate a stream of funding, and it could be a considerable stream of funding, and you look through the plan at the recommendations and see so many of the recommendations could be made stronger with the stronger source of funding.

So I think, you know, if you wanted to look at one key leverage point in this whole plan it would be the carbon pollution tax. Thank you very much.

DR. HOPKINS: Jane Stromberg and then Christine Lang.

MS. STROMBERG: Good evening. My name

is Jane Stromberg S-T-R-O-M-B-E-R-G. I am currently attending the University of Vermont. So anyway when I was younger I dreamed about being a doctor. I was going to do the whole enchilada, go to medical school and everything. As I took many courses in high school I opened my eyes to the urgency of the environmental issues at hand. I completely changed direction and became heavily involved with town politics involving my environmental issues that were happening around me, and then I was inspired to come up to Vermont because again a very fast growing community with regards to that.

I am part of the renewable energy network at the university and that started one semester ago and we are fast growing, recruiting hundreds of kids, and people who are crazy about this. We are passionate. We want to see something. The plan it sounds great, but, you know, 90 percent of renewable by 2050 I'm going to be 53 years old when that's here. I think that deploying carbon tax will give some people initiative to move forward by reducing the carbon emissions that are just impending danger to all of us. I mean how can I be a doctor and, you know, most -- like a lot of problems are

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people coming in with, you know, health problems regarding breathing and, you know, pollutions in the air. It's like we got to go way back to the source, and, you know, stop the issue instead of trying to treat people with problems that are — they are just walking in with. So thank you for your time and yeah.

DR. HOPKINS: Christine Lang and then Sally you're on here twice so you are actually next on the list anyway. So you can come up and get your extra one minute or so. You would be welcome.

MR. LANG: Hi. I'm Christine Lang
L-A-N-G. On page 290 and 291 you talk about health
that has to do with industrial wind turbines, but
there's nothing in there about siting for industrial
wind turbines and how to protect the health of the
citizens of the State of Vermont. The State of Maine
and the State of New Hampshire are both working on
making improvements to their siting standards.
Vermont is not following in that and they should be
looking into that.

Our current noise standard allows outside a bedroom window averaged over an hour not to exceed 45 decibels. Now on those pages you tout a Canadian health study and say that they determined

there's no issues with the industrial wind turbines, but a recent Canadian study has found that people exposed to decibel levels greater than or equal to 40 are extremely highly annoyed and then a study connects that annoyance to health issues. So there are issues when it comes to that, and in the State of New Hampshire what they are trying to adopt right now, and they are quite a ways along on that, is a not to exceed standard of 45 decibels during the day, 8 a.m. to 8 p.m. That's a not to exceed, not an An average allows you to be very loud at times and then drop down and be very loud and then drop down. This is a not to exceed, and then not to exceed 40 decibels at all other times of the day and night so that people can sleep and people can protect their health.

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I think that the state needs to look at the issues, and the other thing is if you're going to put in a standard like that, you have to be able to monitor it. You don't monitor it at any of the sites right now around the State of Vermont. The only monitoring is done by the wind companies and the people who are living there call a number, get an answering machine, leave a message, and then they call them back. No we're in standard. How do you

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know? Nobody knows. So that needs to be continuous third-party monitoring that's transparent.

And what's happened because of -- I
think because of this lack of siting is that there's
now no community support for renewable energy in a
lot of communities in Vermont right now, and that's a
really bad thing. It's a bad precedent that we're
setting. There are at least 67 communities in the
State of Vermont right now that are fighting
renewables. I'm not against renewable energy. I'm
against renewable energy in the wrong places and done
the wrong way, and the State of Vermont needs to put
some measures into their -- into this plan and that
will allow them to regain the confidence of the
communities.

My only other question I really have is this plan we have these comments and all this stuff. How does anything that any of these people are saying and stuff get into the plan, and could there be an appendix to the plan which then would tell -- you could look at to see whether your comments or which things came from people's comments at these meetings. Thank you.

DR. HOPKINS: Sally, I'll allow you to revise and extend your remarks, and I think this

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gentleman was next and then we'll allow anybody else because we have a few more -- a little more time for any thoughts from others.

MS. COLLOPY: Okay. I just want to tack on a little bit to what Christine just said that communities we feel are being abused by energy developers whose coercive tactics are being abetted by Vermont state government, and our recommendations are that the CEP should acknowledge that the state has lost support of many communities and turned They have been cut out of the against renewables. planning process. The regional planning commissions' plans are not respected and taken into consideration. The selectboards' desires and wishes are not respected and taken into consideration, and we feel that that needs to be changed in order for Vermonters to regain confidence again in their communities.

And we also want to acknowledge that the siting decisions that compromise Vermont's environment and damaged our communities and that the siting standards should prohibit forest fragmentation, not compromise wetlands, require developers to work with and not against the state communities, respect municipal and regional plans, and do not allow energy investments that encroach

upon neighbors like the Swanton wind project that is proposed to have the largest turbines in the state closest to any homes to date. So we need to learn -- like I said, on page 225 of your program we need to learn from our past mistakes and not continue to make the same mistakes or even worse mistakes as is proposed with Swanton wind. Thank you.

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DR. HOPKINS: Is there anybody else who wants -- we'll go here and then there.

MR. PATALANO: Joe Patalano

P-A-T-A-L-A-N-O. I'm from Burlington and I just want to echo what people have said about the global warming is upon us and we really need to act boldly in its path. I'm a psychologist so very often what I do with people is I help them develop a cost benefit analysis for whatever decisions they have to make, and one of the things that needs to be factored into the decision about energy, and I'm not only talking about heat and transportation I'm talking about everything that we do in our daily lives; ordering things on Amazon, to the packaging that we buy things in, people need to have a way to know how energy and how fossil fuels figure into the costs. Government needs to help people learn, all of us learn, the implications of our actions. We can't do a cost

benefit analysis unless we know the role and the cost of fossil fuel in the decisions we make. So I want to argue for a carbon tax that makes us all look at the cost of what we're doing. Thank you.

DR. HOPKINS: Thank you.

MR. KAYNOR: Hello, Chapin K-A-Y-N-O-R Williston, and this is more a comment out of ignorance. I didn't plan to comment, but I am aware that, for instance, in Norway sales of new automobiles are in the double digits of plug-in all electric vehicles, and I'm wondering what incentives -- I actually know a little bit, but I don't want to spread any misinformation.

I'm wondering what incentives they are doing and are they ones we could put in this plan, and in a similar way in countries that have a higher proportion of wind power what are their siting criteria and could we basically do more borrowing of other things to make recommendations. Thank you.

DR. HOPKINS: Is there anybody else who wanted to make a comment or is this our final one?

All right. Last one. Thank you.

MR. SCOTT: Thank you. William Scott and I'm from Burlington, and I just want to speak in favor of including a carbon tax as part of the

state's plan because I think it will go a long way toward supporting all the other goals and programs in the plan including, you know, improving improvements in efficiency, transformation to clean energy sources, and as I said earlier inducing capital investment in clean energy because right now all of the -- all the decision making in this area is affected by the enormous subsidies that fossil fuels receive which result in a distortion of the prices.

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Recently the International Monetary Fund estimated that for this year fossil fuel subsidies in the world will total 5.3 trillion, and that's with a T, dollars, and that amount exceeds all the money that governments currently spend on health care. So every time someone looks at this question they see that the subsidies are much greater than was previously thought, and the distortions in the decision making process are therefore greater than was previously understood. The carbon tax just simply starts to take some of the -- those subsidies back and correct some of this terrible imbalance in the pricing system.

Clearly a carbon tax is regressive. I don't know if it's any more regressive than the sales tax or other forms of excise taxes that exist in

Vermont and elsewhere, but most of the plans -- every plan I've seen for Vermont corrects this by redistributing a major portion of the revenue. So while we still have a sales tax that is regressive, under these plans the carbon tax would not be and unlike many taxes it's also been found to increase economic growth rather than impede it. So for those reasons I really do support its inclusion in the plan. Thank you.

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All right. Thank you all DR. HOPKINS: very much for your comments. We will review the transcript and the authors of the relevant chapters will review your comments. We do -- to answer one question we do at the very least plan to make all the comments we received available. One of the advantages of the online form that you will find at energy plan.vt.gov is it allows us to very easily collect all comments. The form is set out by comments so we can make sure the comments get to the authors of the relevant sections and then we can quickly process those. At the very least make the comments public. If not, we'll see what we can do in terms of elucidating in some sort of summary report those comments and how they have informed the final plan.

1	So again your written comments are very
2	welcome. Comment period is open until the 9th of
3	November. Tell your friends. Tell your colleagues.
4	The thoughts you have in the car on the way home, oh
5	I wish I had said, well we have an opportunity.
6	Please go to energyplan.vt.gov. Click on the comment
7	link, fill it out, and send us your thoughts. Very
8	much appreciate it. Thank you for coming out and
9	sharing your evening with us and have a great night.
10	(Whereupon, the proceeding was
11	adjourned at 7:50 p.m.)
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1 CERTIFICATE 2 3 I, JoAnn Q. Carson, do hereby certify that 4 5 I recorded by stenographic means the public meeting re: Comprehensive Energy Plan at the Essex Junction High 6 7 School, 2 Educational Drive, Essex Junction, Vermont, on October 13, 2015, beginning at 7:10 p.m. 8 9 I further certify that the foregoing 10 testimony was taken by me stenographically and thereafter reduced to typewriting, and the foregoing 28 pages are a 11 12 transcript of the stenograph notes taken by me of the 1.3 evidence and the proceedings, to the best of my ability. I further certify that I am not related to 14 15 any of the parties thereto or their Counsel, and I am in no way interested in the outcome of said cause. 16 17 Dated at Burlington, Vermont, this 15th day 18 of October, 2015. 19 20 Joann Q. Carson 21 22 23 JoAnn Q. Carson

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Registered Merit Reporter

Certified Real Time Reporter

					JI
	401-page 4:16	allocations 15:5	14:15, 29:13	CCTA 17:4	22:21, 22:22,
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	,	22:24, 23:1, 23:25	6:14	CEP 23:9	27:15, 27:18,
0 14:23	5	allows [3] - 20:22,	biking 6:2	Certified 29:25	27:19, 27:19,
05402-0329 1:24		21:11, 27:17	bills 12:13	certify [3] - 29:4,	27:22, 27:24, 28:1
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