BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE REQUEST OF DOMINION ENERGY UTAH FOR APPROVAL OF A VOLUNTARY RESOURCE DECISION TO CONSTRUCT AN LNG FACILITY	Docket No. 19-057-13

DIRECT TESTIMONY OF MICHAEL L. GILL

FOR DOMINION ENERGY UTAH

April 30, 2019

DEU Exhibit 5.0

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Michael L. Gill. My business address is 1140 West 200 South, Salt Lake City, UT 84104.

Q. By whom are you employed and what is your position?

A. I am employed by Dominion Energy Utah (Dominion Energy, DEU, or Company) as the Director of Engineering and Project Management. I am responsible for the High-Pressure (HP) Engineering, Intermediate High-Pressure (IHP) Engineering, Systems Engineering, Integrity Management, Survey, GIS, Records Management and Design Drafting Departments. My qualifications are included in DEU Exhibit 5.01.

Q. Have you testified before the Utah Public Service Commission (Commission) before?

A. Yes. I testified in docket number 18-057-03, and I have presented at numerous technical conferences before the Commission in a variety of matters.

Q. Attached to your written testimony are DEU Exhibits 5.01 through 5.17. Were these prepared by you or under your direction?

A. Yes, unless otherwise indicated. Where otherwise indicated, the exhibits are true and correct copies of what they purport to be.

Q. What is the purpose of your testimony?

A. The purpose of my direct testimony is to describe the on-system liquefied natural gas facility for which DEU seeks pre-approval in this docket (the DEU-owned LNG Facility) and to discuss the methodology the Company used to evaluate and preliminarily design the DEU-owned LNG facility. I address the preliminary design, costs, contracting and construction schedule associated with the DEU-owned LNG Facility. I also describe the cost of reinforcements required for each of the options offered in response to the Company's supply reliability request for proposal (RFP). Lastly, I discuss in detail the

potential for the DEU-owned LNG to provide LNG to currently unserved remote communities in Utah.

II. THE PROPOSED DEU-OWNED LNG FACILITY

Q. Please describe the DEU-owned LNG facility that the Company proposes to build.

A. The proposed DEU-owned LNG Facility is a proposed on-system LNG storage facility near Magna, Utah. The preliminary specifications of the DEU-owned LNG facility call for construction of a 15-million-gallon LNG storage tank (Approximately 1,239,000 Dth), an amine gas-pretreatment process, a liquefaction cold box, and gas vaporization facilities. The proposed liquefaction rate is 8.2 MMcfd (approximately 8,200 Dth/day) and the proposed vaporization rate is 150 MMcfd (approximately 150,000 Dth/day).

III. DEU-OWNED LNG FACILITY DESIGN CONSIDERATIONS

Q. Did the Company retain a consultant to conduct analysis and preliminary design services related to the DEU-owned LNG Facility?

A. Yes, in February 2016 DEU began preliminary analysis to determine if an on-system LNG facility was viable. It issued a request for proposal (Engineering RFP) for engineering services to conduct a site evaluation in order to determine potential sites for the construction of an LNG facility, as well as preliminary engineering and design for an LNG facility. DEU received responses to this Engineering RFP from 16 companies.

After evaluating the responses, the Company selected HDR Incorporated (HDR) located in Pooler, GA to conduct a site evaluation. HDR was founded in 1917 and is headquartered in Omaha, Nebraska. Currently, HDR employs more than 10,000 employees and has more than 225 locations worldwide. HDR has over 35 years of experience in providing design and construction services for LNG facilities.

Q. Has the Company selected a site for the DEU-owned LNG Facility?

A. Yes. HDR provided site requirements and DEU's System Planning and Analysis group worked with HDR to identify sites for evaluation. The initial analysis resulted in four possible sites for the DEU-owned LNG Facility, based on each site's proximity to DEU

High Pressure system, as well as its ability to meet state and federal regulatory requirements for vapor dispersion, thermal radiation and proximity to airport runways. The Company then reviewed each site to identify optimal location considering property availability, system operational impact, and project constructability. The Company ultimately purchased an option on property near Magna and commissioned HDR to complete a front end engineering design (FEED) study for this site.

Q. What were the main deliverables of the FEED study?

A. The primary objective of the FEED study was to produce sufficient project definition so that concise engineering, procurement and construction (EPC) contract documents could be developed. The scope included preliminary sizing of all equipment and piping, development of process plans, preliminary site and grading plans, preliminary permitting, and preliminary site utility plans. By having concise documents and eliminating the unknowns from the project, the Company was able to develop a refined cost estimate and prepare the project for bidding. A copy of the FEED study without appendices is attached as DEU Highly Confidential Exhibit 5.02.

Q. What is the role of the EPC contractor?

A. An EPC contractor is responsible for the final engineering of the project, the procurement of all materials associated with the facility, and the construction of the facility. The final engineering documents are developed using the specifications, sizing, preliminary site plan, preliminary utility plan, and the processes detailed in the FEED study.

Q. What size LNG facility did the Company analyze with the FEED study?

A. After consultation with HDR and internal discussions with DEU's Gas Supply and System Planning and Analysis groups, the Company selected the following LNG facility sizing parameters for the FEED study evaluation:

* Liquefaction Rate: 8.2 MMcfd (approximately 8,200 Dth/day)
* Storage Capacity: 15 million gallons (1,239,000 Dth)
* Vaporization Capacity: 150 MMcfd (approximately 150,000 Dth/day)

The vaporization capacity of the DEU-owned LNG Facility was determined by DEU's Gas Supply and System Planning and Analysis Department as discussed in the pre-filed direct testimony of William F. Schwarzenbach. System Planning analyzed how much natural gas could reasonably be taken onto the Company's system at the specified sites, and determined that 150 MMcfd is the maximum volume that the current system could effectively utilize at each individual site. The chosen rate of vaporization coincides with the curtailed volumes of recent supply shortfalls. The tank size was selected both to achieve the capacity described above, and to minimize costs. The selected tank size is typical for a project of this nature. Larger or custom tanks would cost significantly more than the selected tank. The liquefaction rate was based on utilizing "standard" equipment sizing for a project of this nature as well as determining the rate in which the tank could be filled. Based on the selected liquefaction rate of 8.2 MMcfd, it would take approximately 100 days to fill the proposed LNG storage tank.

Q. Please describe liquefaction.

A. Natural gas can be converted into a liquid by cooling it to -260 degrees Fahrenheit. Before the gas enters the cooling process however, impurities and heavy hydro-carbons must be removed. The design presented in the FEED study contemplates utilizing an amine pre-treatment system to purify the gas. The FEED design has specified the use of a liquid nitrogen refrigeration system. The "liquefaction process" describes the entire process of cleaning, compressing, and cooling the gas into a liquid form. At the end of this process the liquefied gas stored in the tank is essentially 100% methane.

Q. How is LNG converted back into a gaseous form that can be used by DEU's customers (vaporized)?

A. LNG is converted back into a gaseous state by pumping LNG from the storage tank and heating the natural gas by passing it through a series of heat exchangers. Prior to putting the vaporized natural gas back into the distribution system it must be re-odorized. The "vaporization process" describes the entire process of pumping LNG from the storage tank, heating it and converting it back to a gaseous state, and re-odorizing it.

Q. In addition to capacity evaluation, did the FEED study evaluate different processes for the DEU-owned LNG Facility?

A. Yes. The FEED study evaluated and recommended options for pre-treatment, liquefaction and storage of LNG at the Magna location. This included examining gas pre-treatment systems (amine vs. mol-sieve), liquefaction methods (nitrogen vs. mixed-refrigerant), compressor type (gas turbine vs. electric motor driven) and tank type (full containment vs. single containment). The Company and HDR worked together to analyze each of these criteria to determine the best solution for the project. Attached DEU Confidential Exhibits 5.03 through 5.06 contain white papers discussing these decisions.

Q. What diameter size, pressure and length of pipeline would serve the DEU-owned LNG Facility?

A. DEU's System Engineering department has indicated the DEU-owned LNG Facility should be connected to the Company's HP system via a 14-inch diameter HP line. This line would be approximately [redacted] A schematic of the proposed piping layout is shown in DEU Confidential Exhibit 5.07.

Q. Mr. Schwarzenbach and Mr. Platt have testified that other options to address supply shortfalls are vulnerable to force majeure and other disruptive events. Has the Company addressed such reliability concerns in the design of the DEU-owned LNG Facility?

A. Yes, the Company and HDR have worked to design a facility that minimizes exposure to outages. All key components on the vaporization cycle (i.e. pumps, generators, compressors) have N+1 redundancy. N +1 redundancy refers to having capacity and functionality backup for critical systems within the facility. If, for example, a pump fails, an identical back up pump is available and ready to be placed into service. In addition, the plant buildings and tank will be built to the latest seismic codes and designed to

withstand potential liquefaction of the supporting soils. Finally, the Company will design the inlet piping and metering to withstand major seismic events.

Q. Has the Company begun to obtain the necessary permitting for the DEU-owned LNG facility?

A. Yes. HDR has been assisting the Company in preliminary permitting of the project. HDR and Company representatives have had discussions with the Salt Lake County Planning Department regarding conditional use permit requirements, as well as the State Department of Environmental Quality regarding air emissions permitting. In addition, DEU had consultants prepare environmental Phase I and Phase II studies to evaluate the site for possible contaminants. There are no contaminants that would prevent DEU from purchasing the property. HDR has evaluated and cleared the project for impacts to threatened and endangered species, cultural resources, and waters of the U.S.

Q. What is the status of the property acquisition?

A. The Company and the property owner have entered into an option agreement whereby the Company could purchase the Magna parcel (Option Agreement). Under the terms of the Option Agreement the Company made a payment of [redacted]. The Company will exercise this purchase option if the Commission approves the Application in this docket.

Q. What is the status of the EPC contract development?

A. The Company and HDR have developed contract documents that are ready for bid release, should the Commission approve construction of the DEU-owned LNG Facility. These include separate scope of work and contract documents for the design engineering and construction of the facility as well as the construction of the LNG storage tank. The scope of work documents provide the EPC contractors with the technical documentation of the project, while the contract documents outline the anticipated commercial terms. The draft contract documents are voluminous, but the FEED study contains a detailed description of the facilities to be constructed.

Q. Why didn't the Company request bids on the project from EPC contractors before filing a pre-approval application with the Commission?

A. The Company prefers to obtain Commission approval in this docket before requesting bids on the project. The Company recognizes that bidding on projects like this one can be very expensive for the bidders. Preparation of these submittals can take months and cost in excess of $50,000 per contractor. The Company did not want to subject potential bidders to that cost risk if the project had not yet received Commission approval. In addition, DEU wanted to request bids for the project with a defined construction schedule. Requesting bids for the project without Commission pre-approval would mean that a construction schedule could not be clearly defined. Because bidders would not know specifically whether the project would be approved and, if so, what the schedule would be, this uncertainty would likely lead to more expensive bids and may impact the quality of construction teams the EPC contractors would provide for the project. As a result, in lieu of obtaining bids, the Company obtained cost estimates that assume a specified schedule.

Q. How much will the DEU-owned LNG Facility cost?

A. The updated total estimated cost for the LNG project is [redacted], including the cost of the EPC contractors, materials, real property, and the Company's internal costs (Labor, Overhead, AFUDC, and inflation). These costs are summarized more thoroughly in the direct testimony of Kelly B Mendenhall.

Q. How did the Company determine the cost of the proposed DEU-owned LNG Facility?

A. The Company used two processes to estimate the final cost of the DEU-owned LNG Facility. First the Company engaged HDR to prepare an estimate based on the results of the FEED study. This estimate utilized estimated costs from suppliers and vendors, as well as the Company's in-house engineering and estimating expertise. The Company also hired EPC contractor Northstar Energy (Northstar) to prepare an estimate based on the statement of work (SOW) and contract documents prepared as part of the FEED study.

Northstar was created in 1996 by former natural gas utility engineers and industry managers. They are headquartered in Methuen, MA. Northstar provides turnkey EPC services to natural gas customers across the country and has extensive LNG experience. Both of these estimates were prepared in 2018 and submitted as part of Docket No. 18-057-03. Review of these estimates show good correlation between the HDR estimate and the Northstar estimate (approximately 1.5% difference). Due to this close correlation between estimates, the Company elected only to update the more conservative (i.e. higher cost) HDR estimate for purposes of the Application in this docket. HDR updated material and labor costs and adjusted 2017/18 cost estimates for inflation. The updated cost estimate has been attached as DEU Highly Confidential Exhibit 5.08. Also, as I discussed above, the price for purchasing the real property has been negotiated and is [redacted] Mr. Mendenhall discusses the remaining elements of the total project cost in his direct testimony.

Q. Please explain how labor and overhead were calculated?

A. This project will require labor allocation from employees in engineering, right of way, legal, construction support and IT. DEU Exhibit 5.09 provides an estimate of the capitalized labor and associated labor overhead for the employees that are anticipated to work on this project. The total for labor and labor overhead amounts to approximately $5,835,000.

Q. If the Commission approves this project, what is the anticipated schedule for construction?

A. The DEU-owned LNG Facility would be in service in 2022 in time for the for the 2022-2023 winter heating season. If the Company receives Commission pre-approval for the decision to construct the DEU-owned LNG Facility, the schedule would be as follows:

Bid Project: Late 2019
Award Project: 1st or 2nd Quarter 2020
Finalize Property Purchase: 1st Quarter 2020
Construct Project: 2nd/3rd Quarter 2020-3rd /4th Quarter 2022

IV. RFP EVALUATION

Q. Were you involved in the preparation and evaluation of the Company's RFP?

A. Yes. I was part of the project team that determined the requirements of the Company's RFP as well the evaluation of the submitted proposals.

Q. What entities submitted proposals in response to the Company's RFP?

A. The Company received responses from three entities. Magnum Energy Midstream LLC responded with [redacted] Prometheus Inc. [redacted]. United Energy Partners LLC proposed [redacted] A thorough description of these projects can be found in the direct testimony of Mr. Schwarzenbach.

Q. What were the main requirements of the RFP?

A. The RFP sent to prospective bidders is attached as Exhibit 3.02 to Mr. Schwarzenbach's Direct Testimony. In summary, the Company sought proposals that would provide a supply reliability resource that is capable of delivering up to 150,000 Dth/day at a delivery pressure between 650 and 720 psig. Additionally the Company identified an optimal delivery location (Optimal Delivery Location) and indicated that for proposals outside of this location, any necessary additional costs for DEU system reinforcements that would be required to achieve the needed system benefit as part of the evaluation. Last the Company indicated that all proposals would be evaluated against the DEU-owned LNG Facility.

Q. Why did the Company indicate the additional costs for system reinforcements would be included in the evaluation?

A. Reinforcements may be necessary to ensure that the RFP proposals met the Company's system needs. In the Company's prior pre-approval docket, Allen Neale, the Division of Public Utilities expert witness, asserted that the Company had failed to provide a clear

"apples to apples" comparison between proposals. He further argued that in order to provide a reliable comparison the proposals would need to provide equivalent system benefits and that costs would have to be added to the proposals that required Company reinforcements to achieve like-system results. In his testimony Mr. Neale states, "And while I say another source may work, in my opinion it would take work on the distribution system. And I want to make sure those costs get fully reflected so that everybody understands what the real cost difference is." Allen R. Neale, Hearing Transcript, Vol. 2, at 389, Docket 18-057-03. In its Order in Docket 18-057-03 (Order), the Commission cited a lack of such an "apples to apples" cost and system benefit comparison as a contributing factor in the decision to deny the Company's pre-approval application in Docket 18-057-03.

Q. Did DEU add additional reinforcement costs to any of the respondent's proposals?

A. Yes. All three of the respondents offered proposals that would require some level of Company reinforcements to achieve equivalent system benefits as the DEU-owned LNG Facility. Attached DEU Highly Confidential Exhibit 5.10 shows the additional reinforcement costs attributed to each proposal in the Company's "apples to apples" comparison. It should be noted, that [redacted] The Company took these costs into account for its evaluation and only attributed the net costs of Company reinforcements to that proposal.

Q. How did the Company determine the required system reinforcements?

A. As more fully described in Michael Platt's testimony, the Company conducted gas network modeling to determine the reinforcement requirements that would need to be constructed to mitigate shortfalls at all gate stations along the Wasatch Front. The Company then determined the most cost-effective reinforcement option and used those costs in its financial analysis.

Q. Did the Company perform cost estimates of the reinforcement requirements?

A. Yes, under my direction, the Company engineering department evaluated reinforcement costs where necessary, and, in the case where multiple solutions were possible, applied the least-cost reinforcement scenario to the option.

V. ANCILLARY BENEFITS

Q. What are ancillary benefits and did the Company address these benefits in its RFP?

A. In Docket No. 18-057-03, the Commission indicated that "[w]e conclude that the ability of the LNG Facility to serve remote, currently unserved locations could qualify as a relevant factor under our required analysis . . . ." October 22, 2018 Order; Docket No. 18-057-03 at 19. Accordingly, in its RFP the Company indicated that it would be evaluating "Other Factors Determined to Be Relevant." The RFP asked respondents to indicate whether the proposed resource could provide benefits such as an opportunity to extend service to remote, currently unserved locations; energy resiliency to governmental or other entities; or other additional services such as peak-hour transportation or no-notice transportation services. The Company treated any additional service that could be offered by the respondent as an "ancillary benefit" of the respondent's base proposal (i.e. supply reliability resource) if it included sufficient detail.

Q. Why is the Company considering ancillary benefits in its evaluation?

A. The Company recognizes that, in the analysis of the lowest-reasonable-cost solution to meet its supply reliability needs, ancillary benefits may provide current or future value that should be considered as part of the analysis. Including an analysis of ancillary benefits allows the Company to more fully compare and contrast similarly-priced options, and more fully determine the best resource option. [redacted]

Q. Did all the participants identify ancillary benefits in their proposals?

A. [redacted]

[redacted]

Q. Did the Company attribute any costs or financial benefits to respondent proposals in regards to providing ancillary benefits during its evaluation of the RFP?

A. [redacted]

Q. Would the DEU-owned LNG Facility provide any ancillary benefits?

A. Yes. The DEU-Owned LNG Facility would allow the Company to provide service to certain remote communities at a greatly reduced cost when compared with the cost of traditional pipeline extensions. To provide LNG service to remote communities the Company would need to construct satellite vaporization facilities and truck LNG to these sites. Additionally, as more fully described in the direct testimony of Mr. Schwarzenbach, the DEU-owned LNG Facility could provide a limited peak-hour service.

Q. **What is a satellite vaporization facility?**

A. A satellite vaporization facility consists of on-site storage tanks and gas vaporization facilities. LNG would be created at and shipped from the main DEU-owned LNG facility and stored in on-site storage tanks located in the remote communities. As gas is needed, LNG would be pumped from these tanks and vaporized back into gaseous form. The gas would then be odorized and placed into the community's distribution system.

Q. What additional measures would the Company need to undertake to be able to provide services to remote communities?

A. To serve remote communities the Company would need to develop trucking facilities at the DEU-owned LNG Facility. The Company has estimated the cost, in 2019 dollars, to

construct these facilities at approximately [redacted]. DEU Highly Confidential Exhibit 5.11 is the study developed by HDR and the Company that defines the proposed site layout, process flow, equipment layout and cost estimate for this expansion. It should be noted that the cost for this expansion is not included in the estimated cost of the DEU-owned LNG Facility. If the Company elected to pursue this option, it would seek Commission approval in a separate docket and include costs associated with the trucking facility and constructing satellite vaporization facilities in the remote communities.

Q. Are there ancillary benefits if an LNG trucking terminal was constructed at the DEU-owned LNG Facility?

A. Yes. The Company could utilize LNG trucks to keep areas in-service during construction activities. This would provide the Company more flexibility in timing projects as the LNG trucks could be used as a temporary gas supply source.

Additionally, the Company could use LNG trucks to hold customers during un-planned outages. Hypothetically, if the outage the Company experienced in Coalville, Utah in January 2017 had been prolonged, the Company could have mobilized LNG trucks to restore service to the community until normal supplies were restored.

Q. How would the Company anticipate providing LNG to these communities without negatively impacting the amount of LNG available for a supply disruption event?

A. As LNG is stored in a tank, the lighter hydrocarbons vaporize and are removed as boil-off gas. If left long enough, the BTU content of the remaining LNG can reach levels where it is too high for use. This phenomenon is referred to as "weathering". To avoid weathering, LNG operators must typically utilize approximately 1/3 of the stored LNG every year. For the DEU-owned LNG facility, this would mean approximately 5 million gallons of LNG would need to be used on an annual basis. It is this volume of LNG that the Company would use to serve remote communities.

Q. What communities could the Company serve using the DEU-Owned LNG Facility?

A. The Company could serve the communities of Kanab, Green River, Utah and Wendover, Utah, and perhaps other areas with satellite LNG facilities at a lower cost than extending pipeline infrastructure to those areas.

Q. How did the Company determine that these communities could be served with LNG at a lower cost than traditional pipeline extensions?

A. The Company retained HDR to conduct pre-FEED studies to determine the cost and viability of constructing satellite LNG facilities to serve these communities. The pre-FEED studies included evaluation of site specific vapor dispersion and thermal radiation requirements, as well as cost estimates to provide utility service, tanks, vaporization facilities, fire protection, and buildings. HDR also evaluated the trucking frequency and cost and the overall operating costs of the facilities.

In order to compare those costs to the cost of extending the Company's pipeline infrastructure to each of those communities, the Company developed cost estimates for serving these same communities via pipeline.

The pre-FEED studies are attached in DEU Highly Confidential Exhibits 5.12 through 5.14. The Company's cost estimates for constructing pipelines to each of those communities are attached as DEU Exhibits 5.15 through 5.17.

The comparison of capital expenditures is shown in the table below:

Capital Cost Estimates for Serving Remote Rural Communities		
Community	Satellite LNG	Pipeline
Kanab	[redacted]	$133.1 Million
Green River	[redacted]	$60.9 Million
Wendover	[redacted]	$154.7 Million

Q. Why did the Company conduct the pre-FEED studies to estimate the construction costs of satellite LNG facilities in these locations?

A. The Company conducted the pre-FEED studies and pipeline estimates to address concerns raised in the Order, and to provide the information required to consider providing service to remote, currently unserved communities in its analysis.

The ability to serve remote communities in Utah with LNG is a tangible benefit of the DEU-owned LNG Facility. While the Company briefly discussed this benefit in Docket No. 18-057-03, it did not provide the necessary detail needed for the Commission to consider it as a relevant factor.

In the Order, the Commission stated, "DEU has presented information in testimony that the LNG facility would provide the opportunity to extend service remote, currently unserved, locations at a lower cost than building pipeline facilities; however, neither the costs of such service extensions, nor the cost of building alternative facilities to serve such areas are part of the record. We conclude that the ability of the LNG facility to serve remote, currently unserved locations could qualify as a relevant factor under our required analysis, but we find the record in this proceeding is insufficient to consider that factor" October 22, 2018 Order, Docket No. 18-057-03, at 19.

By conducting the pre-FEED studies and developing pipeline costs, the Company is providing the relevant detailed information.

Q. Could you please summarize your testimony?

A. To determine the best solution for its supply reliability needs the Company conducted a detailed and complete RFP process to determine the lowest reasonable cost solution that meets the Company's and customers' needs. After a thorough review of the options proposed, the Company determined that its DEU-owned LNG Facility is the most effective and lowest-reasonable cost solution for Company's supply reliability needs. The Company has conducted extensive due diligence in developing the scope and costs associated with the proposed project by completing both pre-FEED and FEED studies on the facility with its consultant HDR.

The Company also developed "apples to apples" costs comparisons of all proposals to capture the true cost to customers of each proposal. The comparison included costs for any needed system reinforcement on options provided in response to the Company's RFP. These reinforcements were determined by the Company's System Engineering Department and estimated by the Company's Engineering Department estimator.

The DEU-owned LNG Facility provides ancillary benefits that include the ability to provide a more economical way to serve remote communities in Utah. The Company has developed pre-FEED studies for construction of an LNG trucking terminal and satellite vaporization facilities in three communities. The studies show that these communities could be served with LNG at a fraction of the cost of traditional pipeline construction. For all these reasons, the DEU-owned LNG Facility is the lowest-reasonable cost

resource to safely and reliably serve our customers and to provide necessary natural gas service to our outlying unserved Utah communities. Approval of the Company's application in this matter is just, reasonable and in the public interest.

Q. Does this conclude your testimony?

A. Yes.

State of Utah)
) ss.
County of Salt Lake)

I, Michael Platt, being first duly sworn on oath, state that the answers in the foregoing written testimony are true and correct to the best of my knowledge, information and belief. Except as stated in the testimony, the exhibits attached to the testimony were prepared by me or under my direction and supervision, and they are true and correct to the best of my knowledge, information and belief. Any exhibits not prepared by me or under my direction and supervision are true and correct copies of the documents they purport to be.

Michael Platt

SUBSCRIBED AND SWORN TO this 30th day of April, 2019.

GINGER JOHNSON
Notary Public State of Utah
My Commission Expires on:
August 4, 2019
Comm. Number: 684539

Notary Public