



National Grid

AMENDMENT REPORT

CUSC Amendment Proposal CAP013

Removal of Redundant Paragraph

Paragraph 6.6.1(b) – Energy Related Charges

The purpose of this report is to assist the Authority in their decision of whether to implement Amendment Proposal CAP013

Amendment Ref	CAP013
Issue	1.0
Date of Issue	8 March 2002
Prepared by	National Grid

DOCUMENT CONTROL

Issue	Date	Author	Change Reference
0.1	27/02/02	National Grid	Initial Draft for internal comment
0.2	28/02/02	National Grid	Draft for industry comment
1.0	08/02/02	National Grid	Formal version for submission to the Authority

DOCUMENT LOCATION

National Grid website:

<http://www.nationalgridinfo.co.uk/cusc/index.html>

DISTRIBUTION

Name	Organisation
The Gas and Electricity Markets Authority	Ofgem
CUSC Parties	Various
Panel Members	Various
National Grid Industry Information Website	

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1.0 SUMMARY AND RECOMMENDATIONS

Summary

- 1.1 Prior to the introduction of the Investment Cost Related Pricing (ICRP) charging methodology in 1993/94, Use of Transmission System charges were split into two components; a System Service Charge and an Infrastructure charge.
- 1.2 For Users with generating plant, the infrastructure component included, inter alia, a charge based on the kWh output of the generator. This charge was termed the Infrastructure Energy Charge. National Grid invoiced such charges on a monthly basis in accordance with Sub Clause 14.1(ii) of the MCUSA.
- 1.3 Following the introduction of the ICRP methodology in 1993/94, the charging rules contained in Sub Clause 14.1(ii) could have been amended to reflect the fact that Infrastructure Energy Charges were no longer invoiced. However, due to the general complexity associated with the MCUSA modification process, the rules concerning the invoicing of the Charges were not amended. Furthermore, the change was not picked up during the establishment of the CUSC given that the remit was to codify the provisions of the MCUSA and Supplemental Agreements meaning the existing wording was carried over.
- 1.4 National Grid submitted CUSC Amendment Proposal CAP013 to the Amendments Panel for consideration at their 11 January 2002 meeting. CAP013 proposes the removal of the redundant paragraph relating to the invoicing of Infrastructure Energy Charges 6.6.1(b). At the meeting, the Panel determined that CAP013 should proceed to wider consultation by National Grid (in accordance with 8.17.12(b)).
- 1.5 As a result of the above, National Grid circulated a Consultation Document to CUSC Parties and Panel Members (and other interested Parties) on 25 January 2002. Comments were requested by no later than close of business, 22 February 2002. Following the consultation, and in accordance with 8.20.3, a draft of this Amendment Report was circulated for comment on the 28 February 2002. Comments were requested by close of business, 7 March 2002.
- 1.6 This Amendment Report (Issue 1.0) was submitted to the Authority on 8 March 2002. The purpose of this document is to assist the Authority in their decision of whether to implement Amendment Proposal CAP013.

Recommendations

National Grid Recommendation

- 1.7 National Grid recommends that Amendment Proposal CAP013 is implemented to the time-scales proposed on the basis that it better facilitates achievement of the Applicable CUSC Objectives as set out in paragraph 1 of Condition C7F to National Grid's Transmission Licence.
- 1.8 This is on the grounds that removal of redundant paragraphs improves the clarity of the CUSC documentation thereby enabling National Grid to more easily and efficiently discharge its obligations under the Act and the Transmission Licence and to facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

Amendments Panel View

- 1.9 The CUSC Amendments Panel members agreed with National Grid's views outlined above.

2.0 INTRODUCTION

- 2.1 This Amendment Report has been issued by National Grid under the rules and procedures specified in the Connection and Use of System Code (CUSC) as designated by the Secretary of State. It addresses an issue that relates to the removal of a redundant paragraph, Paragraph 6.6.1(b) from the CUSC.
- 2.2 Further to the submission of Amendment Proposal CAP013 (see Annex 1), the endorsement of the proposed changes by the Amendments Panel and the subsequent wider industry consultation that was undertaken by National Grid, this document is addressed and furnished to the Gas and Electricity Markets Authority ('the Authority') in order to assist them in their decision whether to implement Amendment Proposal CAP013. Such an amendment will result in changes to Section 6 of the CUSC (as detailed in Annex 2).
- 2.3 This document outlines the nature of the CUSC changes that are proposed for implementation with effect from 1 April 2002. It incorporates National Grid's and the Amendments Panel's recommendations to the Authority concerning the Amendment. Copies of all representations received in response to the consultation have been included. Furthermore, a 'summary' of the representations received is also provided.

- 2.4 This Amendment Report has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid website, at <http://www.nationalgridinfo.co.uk/cusc>.

3.0 THE PROPOSED AMENDMENT

- 3.1 CUSC Amendment Proposal CAP013 (see Annex 1) as submitted by National Grid proposes the removal of paragraph 6.6.1(b) from the CUSC. This is on the grounds that the paragraph is no longer applicable.
- 3.2 The paragraph was codified into the CUSC from Sub Clause 14.1(ii) of the MCUSA and relates to the manner in which National Grid previously invoiced generators for energy related recurrent monthly charges. Such charges formed part of the infrastructure charge that was payable by Users prior to the introduction of the Investment Cost Related Pricing (ICRP) methodology in 1993/94. Although both Transmission Network Use of System (TNUoS) charges and Balancing Services Use of System (BSUoS) charges are energy related charges, they are not, and never have been invoiced under 6.6.1(b) of the CUSC (or under Sub Clause 14.1 (ii) of the MCUSA).
- 3.3 The Sub-Clause was not removed from the MCUSA on introduction of the ICRP methodology mainly due to the complexity associated with the MCUSA modification process. Furthermore, the change was not picked up during the establishment of the CUSC given that the remit was to codify the provisions of the MCUSA and Supplemental Agreements meaning the existing wording was carried over.
- 3.4 National Grid invoices Users for Connection Charges and TNUoS Charges pursuant to Paragraph 6.6.1(a) and BSUoS Charges pursuant to Paragraph 3.14.2 of the CUSC.

4.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES

- 4.1 The applicable CUSC Objectives are set out in paragraph 1 of Condition C7F of the Transmission Licence. CUSC amendments should better facilitate achievement of the Applicable CUSC Objectives. These can be summarised as follows:
- (a) the efficient discharge by NGC of the obligations imposed on it by the Act and the Transmission Licence; and
 - (b) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

- 4.2 National Grid recommends that Amendment Proposal CAP013 is implemented to the time-scales proposed on the basis that it better facilitates achievement of the Applicable CUSC Objectives as set out in paragraph 1 of Condition C7F to National Grid's Transmission Licence.
- 4.3 This is on the grounds that removal of redundant paragraphs improves the clarity of the CUSC documentation thereby enabling National Grid to more easily and efficiently discharge its obligations under the Act and the Transmission Licence and to facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

5.0 PROPOSED IMPLEMENTATION AND TIME-SCALES

- 5.1 It is recommended that Amendment Proposal CAP013 as detailed in this Amendment Report be implemented with effect from 5 days after the Authority's decision or 1 April 2002 (whichever is the later date).

6.0 IMPACT ON CUSC

- 6.1 The proposed Amendment Proposal will require the modification of Paragraph 6.6 of the CUSC (Payment). The relevant legal drafting is contained in Annex 2 of this Amendment Report.

7.0 IMPACT ON CORE INDUSTRY DOCUMENTS

- 7.1 It is envisaged that Amendment Proposal CAP013 will have no impact on any core industry documents.

Changes required & Timescales to be followed to give effect to the Proposed Amendment

- 7.2 As it is envisaged that Amendment Proposal CAP013 will have no impact on any core industry documents no changes are required.

Changes or Developments Required to Central Computer Systems & Timescales Involved

- 7.3 It is envisaged that Amendment Proposal CAP013 will have no impact on Central Computer Systems established under core industry documentation.

Estimation of Costs

7.4 Not Applicable.

8.0 IMPACT ON CUSC PARTIES

8.1 It is envisaged that Amendment Proposal CAP013 will have no impact on any CUSC Parties.

9.0 ALTERNATIVE AMENDMENTS

Description of Alternative Amendment

9.1 No alternative Amendments have been offered or considered as part of this Amendment Proposal.

Assessment against Applicable CUSC Objectives

9.2 Not applicable as no alternative Amendments have been offered or considered.

10.0 SUMMARY OF VIEWS AND REPRESENTATIONS

Amendments Panel Members

10.1 CUSC Amendments Panel members agreed with and supported the implementation of CUSC Amendment Proposal CAP013. This was on the grounds that the removal of redundant paragraphs improves the clarity of the CUSC documentation thereby enabling National Grid to more easily and efficiently discharge its obligations under the Act and the Transmission Licence and to facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

Core Industry Document Owners

10.2 No views have been received from Core Industry Document Owners.

Respondents

10.3 National Grid received a total of 3 responses to the consultation on CUSC Amendment CAP013, all of which were supportive of the proposal.

10.4 The following table provides an overview of the representations received. Copies of the representations are attached as Annex 3.

Reference	Company Name	Supportive	Summary of Comments
CAP013-CR-01	All TXU Companies	Yes	Supportive of the proposal as drafted.
CAP013-CR-02	British Gas Trading Ltd, Accord Energy, Centrica Kings Lynn and Centrica Peterborough	Yes	Supportive of the proposal as drafted. Seeks clarity on the process National Grid intends to adopt for managing CUSC documentation in respect of further house-keeping changes, in particular when these are determined to be of an inconsequential nature. Suggests it should be via some periodic aggregation to limit the administrative impact on National Grid, Ofgem and all other Parties. Suggests it would assist CUSC Parties when reviewing changes of this nature, if National Grid were to always present the necessary amendments required in tabular format.
CAP013-CR-03	Scottish Power Energy Retail Limited and Scottish Power Generation Limited	Yes	Supportive of the proposal as drafted.

National Grid's Views

10.6 National Grid's recommendation regarding this Amendment Proposal is outlined in paragraphs 4.2 and 4.3 above. National Grid has reviewed responses to the consultation on CAP013 and is satisfied that this proposal should be implemented as agreed by the Amendments Panel.

10.7 With regards National Grid's intentions for managing CUSC documentation in respect of further general "housekeeping" changes and amendments (as raised in response CAP013-CR-02), National Grid is currently compiling a list of what are deemed to be 'tidying up' issues such as typographical errors that will be presented as a single Amendment Proposal in the near future. However, whilst some amendments (such as those proposed in CAP013) do only seem to be of an inconsequential nature, they can sometimes raise associated issues which may render them slightly more than "house-keeping" in nature. In view of this, there may be a further need for changes such as those raised in CAP013 to be presented as 'stand-alone' Amendment Proposals.

10.8 Finally, with regards the suggestion to present changes such as those raised in CAP013 in tabular format (as raised in response CAP013-CR-02), we welcome such formatting suggestions and will consider these (and other suggestions) in any future documentation that we produce.

Annex 1 – CUSC Amendment Proposal

CUSC Amendment Proposal Form	CAP013
<p>Title of Amendment Proposal:</p> <p>Removal of Redundant Paragraph [6.6.1(b) - Energy related recurrent charges]</p>	
<p>Description of the Proposed Amendment <i>(mandatory by proposer):</i></p> <p>This Amendment proposes the removal of a redundant paragraph [6.6.1(b)] from the CUSC. The clause was codified into the CUSC from Section 14 of the MCUSA and relates to the manner in which National Grid previously invoiced generators for Energy related recurrent monthly charges (an element of the Infrastructure charge). This type of charge has not been payable since 1992/93 (the charges relate to the pre ICRP methodology) so the paragraph is no longer appropriate.</p>	
<p>Description of Issue or Defect that Proposed Amendment seeks to Address <i>(mandatory by proposer):</i></p> <p>Paragraph 6.6.1(b) of the CUSC is redundant as National Grid invoices Users for Connection Charges and Transmission Network Use of System (TNUoS) Charges pursuant to Section 6.6.1(a) and Balancing Services Use of System (BSUoS) Charges pursuant to Section 3.14.2.</p>	
<p>Impact on the CUSC <i>(this should be given where possible):</i></p> <p>Removal of Paragraph 6.6.1(b) and re-numbering of Paragraph 6.6.1(c) to 6.6.1(b).</p>	
<p>Impact on Core Industry Documentation <i>(this should be given where possible):</i></p> <p>None.</p>	
<p>Impact on Computer Systems and Processes used by CUSC Parties <i>(this should be given where possible):</i></p> <p>None.</p>	
<p>Details of any Related Modifications to Other Industry Codes <i>(where known):</i></p> <p>None.</p>	
<p>Justification for Proposed Amendment with Reference to Applicable CUSC Objectives <i>(mandatory by proposer):</i></p> <p>Removal of redundant paragraphs from the CUSC as put forward in this Amendment Proposal improves the clarity of the CUSC documentation thereby enabling National Grid to more easily and efficiently discharge its obligations under the Act and the Transmission Licence and fulfil its obligations to facilitate competition in the generation and supply of electricity.</p>	

Details of Proposer: Organisation's Name:	National Grid
Capacity in which the Amendment is being proposed: (i.e. CUSC Party, BSC Party or "energywatch")	CUSC Party
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Andy Balkwill National Grid 024 7642 3198 andy.balkwill@uk.ngrid.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	Mike Metcalfe National Grid 024 7642 3235 michael.metcalfe@uk.ngrid.com
Attachments (Yes/No): No	
If Yes, Title and No. of pages of each Attachment:	

Notes:

Those wishing to propose an Amendment to the CUSC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 8.15 of the CUSC. The form seeks to ascertain details about the Amendment Proposal so that the Amendments Panel can determine more clearly whether the proposal should be considered by a Working Group or go straight to wider National Grid Consultation.

The Panel Secretary will check that the form has been completed, in accordance with the requirements of the CUSC, prior to submitting it to the Panel. If the Panel Secretary accepts the Amendment Proposal form as complete, then he will write back to the Proposer informing him of the reference number for the Amendment Proposal and the date on which the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, then he may reject the Proposal. The Panel Secretary will inform the Proposer of the rejection and report the matter to the Panel at their next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform the Proposer.

The completed form should be returned to:

Mark Cox
Panel Secretary
Commercial Development
National Grid Company plc
National Grid House
Kirby Corner Road
Coventry, CV4 8JY

Or via e-mail to: CUSC.Team@uk.ngrid.com

(Participants submitting this form by email will need to send a statement to the effect that the proposer acknowledges that on acceptance of the proposal for consideration by the Amendments Panel, a proposer which is not a CUSC Party shall grant a licence in accordance with Paragraph 8.15.7 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

Annex 2 – Proposed Text to Modify CUSC

6.6 PAYMENT

6.6.1 **NGC** will invoice **Users** for **Connection Charges** and/or **Use of System Charges** due under the **CUSC** and/or each **Bilateral Agreement** and/or as notified to the User where there is no **Bilateral Agreement**, in accordance with the **CUSC** and/or the **Charging Statements** in the following manner:

(a) in the case of recurrent monthly charges ~~other than the Energy related charges~~ identified in the relevant **Charging Statements** **NGC** shall despatch an invoice on or before the 15th day of the month for the charges due in relation to that month;

~~(b) in the case of the Energy related recurrent monthly charges identified in the relevant Charging Statements NGC shall despatch an invoice on or before the 1st day of a month covering the charges due in relation to the period expiring on the 15th day of the preceding month and commencing on the 16th day of the month before that;~~

~~(e)~~(b) unless otherwise specified in the **CUSC** where charges are payable other than monthly **NGC** shall despatch an invoice not less than 30 days prior to the due date for payment.

Annex 3 – Copies of Representations Received

This Annex includes copies of any representations received following circulation of the consultation document (circulated on 25th January 2002 requesting comments by close of business 22nd February 2002).

Representations were received from the following parties:

No.	Company	File Number
1	All TXU Companies which are CUSC Signatories	CAP013-CR-01
2	British Gas Trading Ltd, Accord Energy, Centrica King's Lynn and Centrica Peterborough	CAP013-CR-02
3	Scottish Power Energy Retail Limited and Scottish Power Generation Limited.	CAP013-CR-03

Reference	CAP013-CR-01
Company	All TXU Companies

TXU Europe Energy Trading Ltd
Wherstead Park
Wherstead
Ipswich
Suffolk
IP9 2AQ
29th January 2002

David Friend
Commercial Development
National Grid Company plc
National Grid House
Kirby Corner Road
Coventry
CV4 8JY

Dear David

CAP 013 – Consultation Response

In response to the above Consultation I confirm, on behalf of all TXU Companies which are CUSC signatories, that we support the proposed Modification.

Yours sincerely

Philip Russell
Market Development Manager

Reference	CAP013-CR-02
Company	British Gas Trading Ltd, Accord Energy, Centrica King's Lynn and Centrica Peterborough.



Mr David Friend
National Grid Company plc
Commercial Development
National Grid House
Kirby Corner Road
Coventry
CV4 8JY

Transportation Services
17 London Road
Staines
Middlesex
TW18 4AE

Tel: 01784 645823
Fax: 01784 645260

15th February 2002

Dear Mr Friend

CUSC Amendment Proposal CAP013 – Removal of Redundant Paragraph

British Gas welcomes the opportunity to comment on the CUSC Amendment Proposal CAP013. This response is on behalf of British Gas Trading Ltd, Accord Energy, Centrica King's Lynn and Centrica Peterborough.

We support the Amendment Proposal put forward by NGC for the removal of redundant paragraph 6.6.1(b) from the CUSC and agree that it would improve the clarity and aid understanding of the CUSC documentation thereby allowing NGC to more efficiently discharge its regulatory obligations.

However, this proposal raises a number of other concerns relating to the frequent review and maintenance of the CUSC documentation in ensuring that it remains up to date and relevant. We wish to seek clarity from NGC as to the process they intend to adopt for managing the CUSC documentation in respect of further general "housekeeping" changes and amendments identified for consequential market developments, in particular where these are determined to be of an inconsequential nature.

We would suggest that rather than the raising of a series of small inconsequential Amendment Proposals there should be some periodic aggregation. This should therefore limit the administrative impact on NGC, Ofgem and all other parties. However, any change where any impact on a party is possible should still be the subject of individual Amendment Proposals.

In addition, it would assist CUSC Parties when reviewing changes of this nature, if NGC were to always present the necessary amendments required in a tabular format together with the relevant clauses and commentary explaining the reasoning behind the change.

If you wish to discuss any aspect of our response in more detail please do not hesitate to contact me directly on the number above.

Yours sincerely,

Brian Sequeira
Senior Account Manager

Reference	CAP0013-CR-03
Company	Scottish Power Energy Retail Limited and Scottish Power Generation Limited

-----Original Message-----

From: Sheikh, Abid [<mailto:Abid.Sheikh@ScottishPower.plc.uk>]
Sent: 21 February 2002 16:43
To: Friend, David
Subject: CUSC Consultation: CAP013 & CAP014

Dear Mr. Friend,

Many thanks for the opportunity to consider the consultation documents in respect of CUSC Amendment proposals CAP013 and CAP014. This response is provided on behalf of ScottishPower Energy Retail Limited and Scottish Power Generation Limited.

We agree that these amendments should be made to the CUSC. In both cases, the changes proposed are of a general housekeeping nature. We are satisfied that the reasons provided by both NGC and the Amendments Panel, viz. that the removal of redundant paragraphs will add to the clarity of CUSC documentation and enable NGC to meet its obligations under the Transmission Licence in line with the Applicable CUSC Objectives, are valid.

We have also studied the proposed changes to the text of the CUSC in each case and are satisfied that these are appropriate.

If you wish to discuss the content of this response, please do not hesitate to contact me.

Yours sincerely,

Abid Sheikh
Commercial Analyst (0141 568 3113)

Annex 4 – Copies of Representations Received

This Annex includes copies of any representations received following circulation of the draft amendment report (circulated on 28th February 2002 requesting comments by close of business 7th March 2002).

Representations were received from the following parties:

No.	Company	File Number
1	Scottish Power Energy Retail Limited and Scottish Power Generation Limited.	CAP013-AR-01
2	British Gas Trading Ltd, Accord Energy, Centrica King's Lynn and Centrica Peterborough	CAP013-AR-02

Reference	CAP013-AR-01
Company	Scottish Power Energy Retail Limited and Scottish Power Generation Limited

CUSC Draft Amendment Reports

CAP013: Removal of redundant paragraph 6.6.1 (b) – Energy related charges

CAP014: Removal of redundant paragraphs

Dear Mr. Friend,

Many thanks for the opportunity to consider the draft Amendment Reports in respect of CUSC Amendment proposals CAP013 and CAP014. This response is provided on behalf of ScottishPower Energy Retail Limited and Scottish Power Generation Limited.

We wish to reiterate the comments which we previously provided in support of these Amendments.

We also note the comments of NGC in response to comments on the previous consultations in terms of the process to be adopted to tidy up drafting errors in the CUSC. We trust that NGC will undertake this housekeeping process in as efficient a manner as possible by ensuring that minor errors are dealt with through one, rather than multiple, Amendment proposals.

If you wish to discuss the content of this response, please do not hesitate to contact me.

Yours sincerely,

Abid Sheikh
Commercial Analyst (0141 568 3113)

Reference	CAP013-AR-02
Company	British Gas Trading Ltd, Accord Energy, Centrica King's Lynn and Centrica Peterborough.



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6th March 2002

Dear David,

CUSC Amendment Proposal CAP013 – Removal of Redundant Paragraph 6.6.1(b)

Thank you for the opportunity to comment on the Amendment Report in respect of the above Amendment Proposal. British Gas Trading Limited submitted comments on behalf of itself and other CUSC parties at the consultation phase in respect of CAP0013.

Our comments supporting the Amendment Proposal remain unchanged from our previous response dated 15th February 2002. We note NGC's views in 10.7 of the Amendment Report to our specific points raised and support their intentions on managing changes to the CUSC documentation.

One further observation that we would like to make in respect of the comment in paragraph 5.1 is that whilst the implementation date of 1st April 2002 appears appropriate the timescale for implementation of CUSC amendments are subject to Ofgem's final approval. To avoid any problems in this area should any decision be delayed we would suggest that the implementation date be changed to 5 days after the Authority's decision or 1st April 2002 (subject to approval), whichever is the later date.

If you wish to discuss any aspect of our response in more detail please do not hesitate to contact me directly on the number above.

Yours sincerely,

Brian Sequeira
Senior Account Manager