Wiley Rd 500/230 kV -Wheeler 500/230 kV

General Information

Proposing entity name	NEETMH
Does the entity who is submitting this proposal intend to be the Designated Entity for this proposed project?	Yes
Company proposal ID	1A-WILEY1
PJM Proposal ID	11
Project title	Wiley Rd 500/230 kV -Wheeler 500/230 kV
Project description	Add 1x500/230 kV Transformer ID 1 at NEETMA proposed Wheeler substation in series with new proposed Wheeler- Gracestone 230kV OH line circuit 1
Email	Johnbinh.Vu@nexteraenergy.com
Project in-service date	10/2025
Tie-line impact	Yes
Interregional project	No
Is the proposer offering a binding cap on capital costs?	Yes
Additional benefits	Resolves reliability issues identified per PJM's Gen. Deliv. Process

Project Components

1. Wiley Rd Substation 500/230 kV
2. Wheeler Substation 500/230 kV
3. Wiley Rd Substation -Wheeler Substation 500 kV OH
4. Wheeler Substation – Graceton Substation 230 kV (Circuit 1 and 2)
5. Add 1x Phase Shifting Transformer (PST) at Hope Creek 230 kV substation ...

6. Add 1x Phase Shifting Transformer (PST) at Hope Creek substation to prev...

7. Add two line positions at Graceton (2 new CB)

8. Loop in existing Peach Bottom - Conastone 500kV OH line circuit into NEE...

9. Loop in existing Peach Bottom - Conastone 500kV OH line circuit into NEE...

10. Loop in existing Peach Bottom - Delta 500kV OH line circuit into NEETMA ...

11. Loop in existing Peach Bottom - Delta 500kV OH line circuit into NEETMA ...

12. Loop-In Cooper-Graceton 230 kV line into NEETMA WIley Sub, and retire re...

Greenfield Substation Component

Component title	Wiley Rd Substation 500/230 kV
Project description	New Wiley Rd 500/230 kV substation
Substation name	Wiley Rd
Substation description	New Wiley Rd 500/230 kV substation with connections to Cooper 230 kV, Delta 500 kV, Peach Bottom 500 kV, and the new Wheeler 500/230 kV. The new Wiley Rd. substation will have a ring-bus configuration (4 CB) and one 500/230 kV transformer
Nominal voltage	AC
Nominal voltage	500/230

Transformer Information

	Name	**Capacity (MVA)**	
Transformer	Transformer ID 1 (Wiley-Cooper)	600	
	High Side	**Low Side**	**Tertiary**
Voltage (kV)	500	230	

Major equipment description	New Wiley Rd 500/230 kV substation with connections to Cooper 230 kV, Delta 500 kV, Peach Bottom 500 kV, and the new Wheeler 500/230 kV. The new Wiley Rd. substation will have a ring-bus configuration (4 CB) and one transformer

	Normal ratings	Emergency ratings
Summer (MVA)	600.000000	800.000000
Winter (MVA)	600.000000	800.000000
Environmental assessment	See Attachment 19	
Outreach plan	See Attachment 1, Section 7.4	
Land acquisition plan	See Attachment 22	
Construction responsibility	Proposer	
Benefits/Comments	See Attachment 1, Section 3.4	
Component Cost Details - In Current Year $		
Engineering & design	Confidential - Competitive Information	
Permitting / routing / siting	Confidential - Competitive Information	
ROW / land acquisition	Confidential - Competitive Information	
Materials & equipment	Confidential - Competitive Information	
Construction & commissioning	Confidential - Competitive Information	
Construction management	Confidential - Competitive Information	
Overheads & miscellaneous costs	Confidential - Competitive Information	
Contingency	Confidential - Competitive Information	
Total component cost	$55,192,876.00	
Component cost (in-service year)	$62,808,478.68	

Greenfield Substation Component

Component title	Wheeler Substation 500/230 kV

Project description	New Wheeler 500/230 kV substation
Substation name	Wheeler Substation
Substation description	New Wheeler 500/230 kV Substation which includes connections to Graceton 230 kV, NEETMA's Wiley Rd 500/230 kV substation, Peach Bottom 500 kV, and Conastone 500 kV. Wheeler will have a breaker and a Half configuration with 5 positions (7 CB) and two 500/230 kV transformers
Nominal voltage	AC
Nominal voltage	500/230

Transformer Information

	Name	**Capacity (MVA)**
Transformer	Transformer ID 1 (Wheeler-Graceton Ckt. 1)	1200

	High Side	**Low Side**	**Tertiary**
Voltage (kV)	500	230	

	Name	**Capacity (MVA)**
Transformer	Transformer ID 2 (Wheeler-Graceton Ckt. 2)	1200

	High Side	**Low Side**	**Tertiary**
Voltage (kV)	500	230	

Major equipment description	New Wheeler 500/230 kV Substation which includes connections to Graceton 230 kV, NEETMA's Wiley Rd 500/230 kV substation, Peach Bottom 500 kV, and Conastone 500 kV. Wheeler will have a breaker and a Half configuration with 5 positions (7 CB) and two 1200MVA 500/230 kV transformers.

	Normal ratings	**Emergency ratings**
Summer (MVA)	1200.000000	1200.000000
Winter (MVA)	1200.000000	1200.000000

Environmental assessment	See Attachment 19
Outreach plan	See Attachment 1, Section 7.4
Land acquisition plan	See Attachment 22
Construction responsibility	Proposer
Benefits/Comments	See Attachment 1, Section 3.4
Component Cost Details - In Current Year $	
Engineering & design	Confidential - Competitive Information
Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$100,978,274.00
Component cost (in-service year)	$118,076,008.00

Greenfield Transmission Line Component

Component title	Wiley Rd Substation -Wheeler Substation 500 kV OH
Project description	New overhead single circuit 500kV line from the new 500/230 kV Wiley Rd Substation to the new 500/230 kV Wheeler Substation
Point A	Wiley Rd Substation
Point B	Wheeler Substation

Point C

	Normal ratings	Emergency ratings
Summer (MVA)	3130.000000	4198.000000
Winter (MVA)	3520.000000	4652.000000
Conductor size and type	1590 kcmil Lapwing ACSR (2 conductors per bundle)	
Nominal voltage	AC	
Nominal voltage	500	
Line construction type	Overhead	
General route description	See Attachments 4, 19, and 22	
Terrain description	See Attachment 4	
Right-of-way width by segment	See Attachment 4 and 22	
Electrical transmission infrastructure crossings	See Attachment 7	
Civil infrastructure/major waterway facility crossing plan	See Attachment 7	
Environmental impacts	See Attachment 19	
Tower characteristics	See Attachment 6	
Construction responsibility	Proposer	
Benefits/Comments	See Attachment 1, Section 3.4	
Component Cost Details - In Current Year $		
Engineering & design	Confidential - Competitive Information	
Permitting / routing / siting	Confidential - Competitive Information	
ROW / land acquisition	Confidential - Competitive Information	
Materials & equipment	Confidential - Competitive Information	

Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$19,478,367.00
Component cost (in-service year)	$21,548,367.00

Greenfield Transmission Line Component

Component title	Wheeler Substation – Graceton Substation 230 kV (Circuit 1 and 2)
Project description	New overhead double circuit 230 kV line from the new 500/230 kV Wheeler Substation to the existing 230 kV Graceton Substation
Point A	Wheeler Substation
Point B	Graceton Substation
Point C	

	Normal ratings	**Emergency ratings**
Summer (MVA)	1440.000000	1930.000000
Winter (MVA)	1618.000000	2140.000000

Conductor size and type	1590 kcmil Lapwing ACSR (2 conductors per bundle)
Nominal voltage	AC
Nominal voltage	230
Line construction type	Overhead
General route description	See Attachments 4 and 22
Terrain description	See Attachment 4

Right-of-way width by segment	See Attachment 4 and 22
Electrical transmission infrastructure crossings	No electrical transmission infrastructure crossings
Civil infrastructure/major waterway facility crossing plan	The Wheeler to Graceton 230 kV (Circuit 1 and 2) has one civil infrastructure crossing at Wheeler School Road. NEETMA anticipates an overhead crossing and will obtain the permit/agreement with the applicable agency
Environmental impacts	See Attachment 19
Tower characteristics	See Attachment 6
Construction responsibility	Proposer
Benefits/Comments	See Attachment 1, Section 3.4

Component Cost Details - In Current Year $

Engineering & design	Confidential - Competitive Information
Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$3,330,000.00
Component cost (in-service year)	$3,604,499.00

Substation Upgrade Component

Component title	Add 1x Phase Shifting Transformer (PST) at Hope Creek 230 kV substation to prevent downstream overload on Hope-Creek LS Power Ckt. 1

Project description	Add 1x Phase Shifting Transformer (PST) at Hope Creek substation to prevent downstream overload on Hope Creek- LS Power 230kV Ckt. 1
Substation name	Hope Creek 230 kV
Substation zone	PSEG
Substation upgrade scope	Add 1x Phase Shifting Transformer (PST) at Hope Creek substation to prevent downstream overload on Hope Creek- LS Power 230kV Cable Ckt. 1

Transformer Information

	Name	**Capacity (MVA)**	
Transformer	Hope Creek 230 kV PST - Ckt. 1	766	
	High Side	**Low Side**	**Tertiary**
Voltage (kV)	230	230	
New equipment description	AC Substation: Phase Shifter		
Substation assumptions	Use available space in sub to add phase shifting transformer		
Real-estate description	No expansion of substation fence anticipated		
Construction responsibility	PSEG		
Benefits/Comments	Resolves reliability issues identified per PJM's Gen. Deliv. Process		

Component Cost Details - In Current Year $

Engineering & design	Confidential - Competitive Information
Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information

Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$15,000,000.00
Component cost (in-service year)	$16,240,000.00

Substation Upgrade Component

Component title	Add 1x Phase Shifting Transformer (PST) at Hope Creek substation to prevent downstream overload on Hope Creek- LS Power 230kV Ckt. 2
Project description	Add 1x Phase Shifting Transformer (PST) at Hope Creek substation to prevent downstream overload on Hope Creek- LS Power 230kV Ckt. 2
Substation name	Hope Creek 230 kV
Substation zone	PSEG
Substation upgrade scope	Add 1x Phase Shifting Transformer (PST) at Hope Creek substation to prevent downstream overload on Hope Creek- LS Power 230kV Cable Ckt. 2

Transformer Information

	Name	**Capacity (MVA)**	
Transformer	Hope Creek 230 kV PST - Ckt. 2	766	
	High Side	**Low Side**	**Tertiary**
Voltage (kV)	230	230	
New equipment description	AC Substation: Phase Shifter		
Substation assumptions	Use available space in sub to add phase shifting transformer		
Real-estate description	No expansion of substation fence anticipated		
Construction responsibility	PSEG		

Benefits/Comments	Resolves reliability issues identified per PJM's Gen. Deliv. Process

Component Cost Details - In Current Year $

Engineering & design	Confidential - Competitive Information
Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$15,000,000.00
Component cost (in-service year)	$16,240,000.00

Substation Upgrade Component

Component title	Add two line positions at Graceton (2 new CB)
Project description	Add two line positions at Graceton (2 new CB)
Substation name	Graceton 230 kV
Substation zone	BGE
Substation upgrade scope	Add 2 CB

Transformer Information

None

New equipment description	AC Substation : Upgrade - add two line positions
Substation assumptions	Open positions available per TO provided one-lines

Real-estate description	No expansion of substation fence anticipated
Construction responsibility	BGE
Benefits/Comments	Resolves reliability issues identified per PJM's Gen. Deliv. Process

Component Cost Details - In Current Year $

Engineering & design	Confidential - Competitive Information
Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$8,080,000.00
Component cost (in-service year)	$8,740,000.00

Transmission Line Upgrade Component

Component title	Loop in existing Peach Bottom - Conastone 500kV OH line circuit into NEETMA proposed Wheeler 500kV substation and use existing conductors
Project description	Loop in existing Peach bottom - Conastone 500kV OH line circuit 1 into NEETMA proposed Wheeler 500kV substation, use existing conductors on the section Wheeler - Conastone
Impacted transmission line	New NEETMA-Wheeler substation to Conastone 500 kV line
Point A	Wheeler
Point B	Conastone
Point C	

Terrain description	Expect to utilize existing easements/utility owned property, no expansion anticipated

Existing Line Physical Characteristics

Operating voltage	500
Conductor size and type	Same as existing
Hardware plan description	Utilize existing line hardware to extent practicable
Tower line characteristics	Utilize existing towers to extent practicable

Proposed Line Characteristics

	Designed	**Operating**
Voltage (kV)	500.000000	500.000000
	Normal ratings	**Emergency ratings**
Summer (MVA)	2920.000000	3620.000000
Winter (MVA)	2920.000000	3620.000000

Conductor size and type	Same as existing
Shield wire size and type	Utilize existing shield wire to extent practicable
Rebuild line length	0.1 miles
Rebuild portion description	Add new dead-end structures to bring the Peach Bottom-Conastone 500 kV line into Wheeler 500 kV
Right of way	Use of existing ROW, no expansion anticipated
Construction responsibility	BGE
Benefits/Comments	Resolves reliability issues identified per PJM's Gen. Deliv. Process

Component Cost Details - In Current Year $

Engineering & design	Confidential - Competitive Information

Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$3,000,000.00
Component cost (in-service year)	$3,250,000.00

Transmission Line Upgrade Component

Component title	Loop in existing Peach Bottom - Conastone 500kV OH line circuit into NEETMA proposed Wheeler 500kV substation and use existing conductors
Project description	Loop in existing Peach bottom - Conastone 500kV OH line circuit into NEETMA proposed Wheeler 500kV substation, use existing conductors on the section Peach Bottom - Wheeler
Impacted transmission line	New NEETMA-Wheeler sub to Peach Bottom 1 South 500 kV line
Point A	Wheeler
Point B	Peach Bottom
Point C	
Terrain description	Expect to utilize existing easements/utility owned property, no expansion anticipated

Existing Line Physical Characteristics

Operating voltage	500
Conductor size and type	Same as existing
Hardware plan description	Utilize existing line hardware to extent practicable

Tower line characteristics	Utilize existing towers to extent practicable

Proposed Line Characteristics

	Designed	**Operating**
Voltage (kV)	500.000000	500.000000
	Normal ratings	**Emergency ratings**
Summer (MVA)	2920.000000	3620.000000
Winter (MVA)	2920.000000	3620.000000

Conductor size and type	Same as existing
Shield wire size and type	Utilize existing shield wire to extent practicable
Rebuild line length	0.1 miles
Rebuild portion description	Install new dead-end structures in order to loop in the
Right of way	Use of existing ROW, no expansion anticipated
Construction responsibility	BGE
Benefits/Comments	Resolves reliability issues identified per PJM's Gen. Deliv. Process

Component Cost Details - In Current Year $

Engineering & design	Confidential - Competitive Information
Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information

Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$3,000,000.00
Component cost (in-service year)	$3,250,000.00

Transmission Line Upgrade Component

Component title	Loop in existing Peach Bottom - Delta 500kV OH line circuit into NEETMA proposed Wiley Rd 500kV substation and use existing conductors
Project description	Loop in existing Peach Bottom - Delta 500kV OH line circuit into NEETMA proposed Wiley Rd 500kV substation, use existing conductors on the section Peach Bottom - Wiley
Impacted transmission line	New NEETMA-Wiley Rd substation to Peach Bottom 1 South 500 kV line
Point A	Wiley Rd
Point B	Peach Bottom
Point C	
Terrain description	Expect to utilize existing easements/utility owned property, no expansion anticipated

Existing Line Physical Characteristics

Operating voltage	500
Conductor size and type	Same as existing
Hardware plan description	Utilize existing line hardware to extent practicable
Tower line characteristics	Utilize existing towers to extent practicable

Proposed Line Characteristics

	Designed	Operating
Voltage (kV)	500.000000	500.000000

	Normal ratings	Emergency ratings
Summer (MVA)	2338.000000	2931.000000
Winter (MVA)	2338.000000	2931.000000
Conductor size and type	Same as existing	
Shield wire size and type	Utilize existing shield wire to extent practicable	
Rebuild line length	0.1 miles	
Rebuild portion description	0.1 miles	
Right of way	Use of existing ROW, no expansion anticipated	
Construction responsibility	PECO	
Benefits/Comments	Resolves reliability issues identified per PJM's Gen. Deliv. Process	
Component Cost Details - In Current Year $		
Engineering & design	Confidential - Competitive Information	
Permitting / routing / siting	Confidential - Competitive Information	
ROW / land acquisition	Confidential - Competitive Information	
Materials & equipment	Confidential - Competitive Information	
Construction & commissioning	Confidential - Competitive Information	
Construction management	Confidential - Competitive Information	
Overheads & miscellaneous costs	Confidential - Competitive Information	
Contingency	Confidential - Competitive Information	
Total component cost	$3,000,000.00	
Component cost (in-service year)	$3,250,000.00	

Transmission Line Upgrade Component

Component title	Loop in existing Peach Bottom - Delta 500kV OH line circuit into NEETMA proposed Wiley Rd 500kV substation and use existing conductors
Project description	Loop in existing Peach Bottom - Delta 500kV OH line circuit into NEETMA proposed Wiley Rd 500kV substation, use existing conductors on the section Wiley - Delta
Impacted transmission line	New NEETMA-Wiley Rd substation to Delta 500 kV line
Point A	Wiley Rd
Point B	Delta
Point C	
Terrain description	Expect to utilize existing easements/utility owned property, no expansion anticipated

Existing Line Physical Characteristics

Operating voltage	500
Conductor size and type	Same as existing
Hardware plan description	Utilize existing line hardware to extent practicable
Tower line characteristics	Utilize existing towers to extent practicable

Proposed Line Characteristics

	Designed	**Operating**
Voltage (kV)	500.000000	500.000000
	Normal ratings	**Emergency ratings**
Summer (MVA)	2338.000000	2931.000000
Winter (MVA)	2338.000000	2931.000000
Conductor size and type	Same as existing	

Shield wire size and type	Utilize existing shield wire to extent practicable
Rebuild line length	0.1 miles
Rebuild portion description	0.1 miles
Right of way	Use of existing ROW, no expansion anticipated
Construction responsibility	PECO
Benefits/Comments	Resolves reliability issues identified per PJM's Gen. Deliv. Process
Component Cost Details - In Current Year $	
Engineering & design	Confidential - Competitive Information
Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$3,000,000.00
Component cost (in-service year)	$3,250,000.00

Transmission Line Upgrade Component

Component title	Loop-In Cooper-Graceton 230 kV line into NEETMA WIley Sub, and retire remaining portion to Graceton 230 kV
Project description	Loop-In Cooper-Graceton 230 kV line into NEETMA WIley Sub, and retire remaining portion to Graceton 230 kV
Impacted transmission line	New NEETMA-Wiley Rd substation to Cooper 230 kV line

Point A	Wiley Rd
Point B	Cooper
Point C	
Terrain description	Expect to utilize existing easements/utility owned property, no expansion anticipated

Existing Line Physical Characteristics

Operating voltage	230
Conductor size and type	Same as existing
Hardware plan description	Utilize existing line hardware to extent practicable
Tower line characteristics	Utilize existing towers to extent practicable

Proposed Line Characteristics

	Designed	**Operating**
Voltage (kV)	230.000000	230.000000
	Normal ratings	**Emergency ratings**
Summer (MVA)	463.000000	578.000000
Winter (MVA)	463.000000	578.000000
Conductor size and type	Same as existing	
Shield wire size and type	Utilize existing shield wire to extent practicable	
Rebuild line length	0.1 miles	
Rebuild portion description	Install new dead-end structures to re-terminate the Cooper-Graceton 230 kV and modify it to be Cooper-Wiley 230 kV line. Retire the remaining portion from Wiley to Graceton.	
Right of way	New structures will utilize existing rights-ofway, or rights-of-way that NEETMA has secured an option for	

Construction responsibility	PECO
Benefits/Comments	Resolves reliability issues identified per PJM's Gen. Deliv. Process

Component Cost Details - In Current Year $

Engineering & design	Confidential - Competitive Information
Permitting / routing / siting	Confidential - Competitive Information
ROW / land acquisition	Confidential - Competitive Information
Materials & equipment	Confidential - Competitive Information
Construction & commissioning	Confidential - Competitive Information
Construction management	Confidential - Competitive Information
Overheads & miscellaneous costs	Confidential - Competitive Information
Contingency	Confidential - Competitive Information
Total component cost	$2,000,000.00
Component cost (in-service year)	$2,160,000.00

Congestion Drivers

None

Existing Flowgates

None

New Flowgates

None

Financial Information

Capital spend start date	01/2022
Construction start date	12/2024
Project Duration (In Months)	45

Cost Containment Commitment

Cost cap (in current year)	Confidential - Competitive Information
Cost cap (in-service year)	Confidential - Competitive Information

Components covered by cost containment

1. Wiley Rd Substation 500/230 kV - Proposer
2. Wheeler Substation 500/230 kV - Proposer
3. Wiley Rd Substation -Wheeler Substation 500 kV OH - Proposer
4. Wheeler Substation – Graceton Substation 230 kV (Circuit 1 and 2) - Proposer

Cost elements covered by cost containment

Engineering & design	Yes
Permitting / routing / siting	Yes
ROW / land acquisition	Yes
Materials & equipment	Yes
Construction & commissioning	Yes
Construction management	Yes
Overheads & miscellaneous costs	Yes
Taxes	Yes

AFUDC	Yes
Escalation	Yes
Additional Information	Confidential - Competitive Information
Is the proposer offering a binding cap on ROE?	Yes
Would this ROE cap apply to the determination of AFUDC?	Yes
Would the proposer seek to increase the proposed ROE if FERC finds that a higher ROE would not be unreasonable?	No
Is the proposer offering a Debt to Equity Ratio cap?	Confidential - Competitive Information
Additional cost containment measures not covered above	

Additional Comments

None