Decision No. C24-0596

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 23R-0577T

IN THE MATTER OF THE PROPOSED AMENDMENTS TO 4 CODE OF COLORADO REGULATIONS 723-2 MODIFYING THE COMMISSION RULES REGARDING BASIC EMERGENCY SERVICE OUTAGE PREVENTION, RESPONSE, AND REPORTING.

COMMISSION DECISION DENYING EXCEPTIONS TO RECOMMENDED DECISION

Issued Date: August 19, 2024 Adopted Date: August 7, 2024

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I. STATEMENT, FINDINGS, AND CONCLUSIONS

A. STATEMENT

1. Through this Decision, the Commission denies the exceptions filed on July 3, 2024, by Lumen doing business as CenturyLink QC ("CenturyLink") to Decision No. R24-0403, issued June 13, 2024, by Administrative Law Judge ("ALJ") Melody Mirbaba ("Recommended Decision").

2. The Commission adopts amendments to the Colorado Public Utilities Commission's (the "Commission") Rules Regulating Telecommunications Services and providers of Telecommunications Services, 4 *Code of Colorado Regulations* ("CCR") 723-2 (the "Rules"). Changes amend Rules relating to basic emergency service in Rules 2131, 2134, 2136, 2143, and Rule 2335, 4 CCR 723-2. The adopted rules are attached to this Decision in legislative format (*i.e.* strikeout/underline) as Attachment A, and in final format as Attachment B.

B. BACKGROUND

3. During the weekly meeting held on November 29, 2023, the Commission initiated this Proceeding by issuing a Notice of Proposed Rulemaking ("NOPR") to amend the Rules, issued as Decision No C23-0800. The NOPR proposed to amend several existing sections of the Rules in order to clarify responsibilities of Basic Emergency Service Providers ("BESP") in the provision

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of Basic Emergency Service ("BES"), specifically handling of outages, required notification in the event of an outage, and the provision of billing credits in the case of extended BES outages.

4. The NOPR adopted a schedule for filing comments and invited interested participants to file initial comments no later than January 10, 2024, and requested reply comments no later than January 19, 2024. The Commission referred this matter to an ALJ to preside over rulemaking hearings and for the issuance of a recommended decision. A public rulemaking hearing was scheduled for January 29, 2024. The hearing was convened on that date for the sole purpose of continuing the public hearing comment to a future hearing date, set for February 29, 2024, and modifying the deadline for initial comments to February 12, 2024, and the deadline for responsive comments to February 21, 2024.¹

5. On April 23, 2024, the ALJ took administrative notice of a filing that the 9-1-1 Advisory Task Force ("Task Force") made in Proceeding 17M-0276T on March 14, 2023, titled "Adopted Criteria for Informal Investigations of BES Outages" and invited additional comment on this issue, due by May 1, 2024.²

6. The ALJ issued Recommended Decision No. R24-0403 on June 13, 2024, proposing adoption of amended rules similar to the rules initially proposed in the NOPR, but also incorporating new definitions based on comments made through the rulemaking proceeding.

7. The Commission adopts amendments to the Commission's Rules Regulating Telecommunications Services and providers of Telecommunications Services, 4 CCR 723-2. Changes amend Rules relating to basic emergency service in Rules 2131, 2134, 2136, 2143, and

¹ See Interim Decision R24-0068-I, issued January 30, 2024.

² See Interim Decision R24-0263-I, issued April 23, 2024.

Rule 2335, 4 CCR 723-2. The adopted rules are attached to this Decision in legislative format (*i.e.* strikeout/underline) as Attachment A, and in final format as Attachment B.

C. EXCEPTIONS TO RECOMMENDED DECISION

8. On July 3, 2024, CenturyLink filed exceptions to the Recommended Decision. Specifically, CenturyLink objected to provisions related to Rule 2131(cc), Rule 2131(cc)(I), Rule 2131(cc)(II), Rule 2143(j)(VII), Rule 2143(j)(VIII), and Rule 2143(k). Overall, CenturyLink's arguments are that the definitions in the Decision are too broad, that the rules impose a burden unbalanced by benefit, and that the Rules do not give Commission Staff enough flexibility in managing implementation of the Rules.

9. No other participants filed exceptions to the Recommended Decision.

10. Two parties, Colorado Council of Authorities ("CCOA") and the Adams County 911 Authority, the Arapahoe County 911 Authority, and the Jefferson County Emergency Communications Authority ("AAJ" or the "AAJ Authorities"), filed responses to CenturyLink's exceptions.

1. Rule 2131(cc) – Definition of PSAP service disruption

11. Rule 2131(cc) creates a new definition of "PSAP service disruption" as follows: "PSAP service disruption" means any situation in which a BESP is unable to deliver 9-1-1 calls, Automatic Number Identification ("ANI"), Automatic Location Identification ("ALI") or location information to the primary demarcation point due to an event or incident inside the BES network or on the BESP's side of the demarcation point. A PSAP service disruption includes, but is not limited to: (1) any event or incident that occurs inside the BES network that results in or requires the BESP to reroute 9-1-1 calls to the demarcation point for an alternate PSAP or the governing body for an alternate PSAP; or (2) any situation in which a PSAP is unable to receive 9-1-1 calls or location information as the result of an event or incident that occurs inside the BES network, even if the facilities involved in the event or incident also provide OSP connectivity."³

12. This definition replaces the previous definition of "Basic emergency service outage" or "BES outage," which was "a failure of basic emergency service that prevents or would prevent 9-1-1 calls, ANI, or location information from being delivered from the demarcation point between the OSP or IASP and the BESP to the demarcation point between the BESP and the governing body or PSAP."⁴

13. Through her Recommended Decision, the ALJ declined to adopt a proposed amendment to the definition of "Basic emergency service outage," finding that "the public interest is better served by replacing the definition of 'BES Outage' with terminology and language that more accurately addresses the underlying issues while maintaining consistency with the statutory definition of BES."

a. Exceptions

14. Through its Exceptions, CenturyLink maintains that this rule is too broad and "could be read to broadly define as a service interruption any 'event or incident' without limit on the BESP side of the demarcation point." CenturyLink further argues that "this could include problems or troubles in any Originating Service Provider ("OSP") network that, for whatever reason and through no fault of the BESP, prevents that provider's customers from calling 9-1-1 and/or reaching the BESP." CenturyLink proposes deleting the clause "or on the BESP's side of the demarcation point."

³ See Recommended Decision ¶ 42.

⁴ See Rule 2131(1) 4 CCR 723-2.

b. Findings and Conclusions

15. We disagree with CenturyLink's arguments. The Commission finds the revised definition of "PSAP service disruption" clear in that it excludes outages of individual OSPs, and only includes situation where the BESP is unable to deliver 9-1-1 calls to a PSAP or governing body due to issues in the BES network, even when portions of the BES network serve to provide originating service as well as BES. The Commission has authority where an outage or failure affects BES, regardless of whether the outage has other effects as well. We find that this is an appropriate use of Commission authority regardless of whether in certain cases the "event or incident" could also be OSP-related.

16. For this reason, the Commission denies CenturyLink's exception to this rule, and notes that the replies from both the AAJ Authorities and CCOA support this position. The AAJ Authorities agree with the Commission that the Rule applies to events or incidents that occur inside the BES network, even if facilities involved also provide OSP connectivity. They also argue that dual service does not automatically immune the facility from falling under the PSAP Service Disruption parameters, which we agree is a clear reading of the implemented rule.

2. Rule 2131(cc)(I) – Rerouting of 9-1-1 calls to alternate PSAP

17. Rule 2131(cc)(I) states that "any event or incident that occurs inside the BES network that results in or requires the BESP to reroute 9-1-1 calls to the demarcation point for an alternate PSAP or the governing body for an alternate PSAP."

18. This subparagraph of the definition of "PSAP service disruption" was adopted to address CenturyLink's argument in this Proceeding that "if it delivers a 9-1-1 call to an alternate PSAP, it has provided BES, and there has been no BES outage."⁵

⁵ See Recommended Decision ¶ 41.

19. Through her recommended Decision, the ALJ noted that, by interpreting the definition of BES outage in this way, "CenturyLink fails to recognize that there are real consequences to the public's health and safety when 9-1-1 calls are not delivered to the point of interconnection with the PSAP or governing body primarily responsible for the 9-1-1 call based on the caller's location." The ALJ further noted that "when a BESP instead delivers a 9-1-1 call to the point of interconnection with an alternate PSAP or governing body (who are not primarily responsible for the 9-1-1 call based on the caller's location), this amounts to BES that negatively impacts the public health, welfare, and safety, and as a result, requires Commission oversight and intervention."⁶

20. The ALJ further states that "This definition directly tackles a primary issue that the Commission intended to address through this Proceeding (*i.e.*, issues surrounding delivery to a demarcation point for an alternate PSAP rather than the demarcation point for the caller's location). The definition, combined with other Rule changes will enable the Commission to determine what action, if any, can be taken to avoid or mitigate these issues, thereby safeguarding the public interest from delays in receiving emergency assistance."⁷

a. Exceptions

21. Through its Exceptions, CenturyLink states that the Recommended Decision is operating on "the mistaken concept that the delivery of a 9-1-1 call, with ALI/ANI intact, to the designated alternate PSAP per contingency planning, is a network outage."⁸ CenturyLink further states that "a call delivered to an alternate PSAP is *not* a service disruption."

⁶ See Recommended Decision ¶ 41.

⁷ See Recommended Decision ¶ 43.

⁸ CenturyLink Exceptions, p. 3.

b. Findings and Conclusions

22. We disagree with CenturyLink's arguments. Contrary to CenturyLink's characterization, the proposed rule does not declare situations in which calls are re-routed to an alternate PSAP to be a "network outage." Rather, the rule recognizes that such situations are a PSAP service disruption, because calls cannot be routed to the intended PSAP, as defined by "primary demarcation point."

23. CenturyLink states that "a call delivered to an alternate PSAP is not a service disruption."⁹ To the contrary, the Commission recognizes that when the BESP is unable to deliver 9-1-1 calls to the primary demarcation point of a PSAP or governing body, then service to that PSAP *has* been disrupted. In such cases, the PSAP is not receiving the service that the PSAP or governing body is paying to receive, which is delivery of 9-1-1 calls to that PSAP or governing body. Additionally, such disruptions are very burdensome to the PSAP, can delay dispatching of emergency responses, and create risk to public safety.

24. In its reply to CenturyLink's Exceptions, CCOA notes that CenturyLink Tariff No. 25 denotes an objective for call delivery accuracy to be at or greater than 99.99 percent for "calls delivered to the correct PSAP demarcation point based on the location information provided to the Company."¹⁰

25. In its reply comments, AAJ states that it agrees with the Recommended Decision that any reroute can affect PSAP operations and delay response times, and accordingly are important to report and should require notification to the affected primary and backup PSAP.

⁹ Id.

¹⁰ CCOA Exceptions, p. 3, citing CenturyLink Tariff No. 25, Original Page 67, 9.2.5 (I)(2)(g).

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26. Additionally, CenturyLink Tariff No. 25 defines the inability of a PSAP to receive a 9-1-1 call as a "Severity Level 1 Network Failure."¹¹ Based on this, the Commission can surmise that CenturyLink understands the importance of delivering calls to the correct PSAP or governing body whenever possible. Delivery of calls to an alternate PSAP is an important and critical strategy to mitigate the impact of a PSAP service disruption, but it does mean that a PSAP service disruption has occurred.

27. For the reasons stated above, the Commission denies CenturyLink's Exception to this rule, and notes that both the AAJ Authorities and CCOA, in their reply comments described above, agree with this position.

3. Rule 2131(cc)(II)

28. Rule 2131(cc)(II) states that "any situation in which a PSAP is unable to receive 9-1-1 calls or location information as the result of an event or incident that occurs inside the BES network, even if the facilities involved in the event or incident also provide OSP connectivity."

29. This subsection of the definition of "PSAP service disruption" is addressed by the ALJ in her Recommended Decision. Specifically, the ALJ states that "the language clarifies that when a service disruption occurs due to an event or incident that occurred inside the BES network or on the BESP's side of the demarcation point that may have also involved facilities that provide OSP connectivity, this is still a service disruption under Commission Rules. This recognizes that while BESPs have discretion to use facilities for BES that are also used for OSP connectivity, doing so has no impact on whether a service disruption subject to the Commission's regulation has occurred. It also squarely addresses misguided positions that CenturyLink has taken on this issue in prior investigations, as discussed in the NOPR. What is more, although the above definition

¹¹ CCOA Exceptions, p. 3, citing CenturyLink Tariff No. 25, Original Page 65, 9.2.5 (I)(1).

references OSP connectivity, it does not contemplate or attempt to regulate OSP connectivity and services."¹²

a. Exceptions

30. Through its Exceptions, CenturyLink takes the position that the Recommended Decision improperly expands its jurisdiction over OSP operations.

31. CenturyLink proposes to delete the last clause of the rule, specifically "even if the facilities involved in the event or incident also provide OSP connectivity."

32. In its response, AAJ notes that this rule is necessary to ensure that merely providing a dual service does not automatically immune the facility from falling under the PSAP Service Disruption parameters.

b. Findings and Conclusions

33. The Commission disagrees with CenturyLink's exception and proposed clause deletion. The Commission finds this phrase necessary to include because CenturyLink has previously denied that outages to a PSAP were their responsibility as a Basic Emergency Service Provider, even when the outage was due to a central office outage. Such central offices serve as a component of both the Originating Service Provider network and the BESP network. When such facilities experience outages, the BESP is unable to deliver any 9-1-1 calls to the primary demarcation point of the PSAP or governing body.

34. Accepting CenturyLink's interpretation that the failure of a component of the OSP network is not a PSAP service disruption, even when that component is critical in delivering 9-1-1 calls to a PSAP or governing body and is therefore part of the BES network, would essentially

¹² See Recommended Decision ¶ 45.

relieve CenturyLink of all responsibility for the operation of all components involved in the transportation of 9-1-1 calls from the ESInet to the PSAP or governing body.

35. For the reasons stated above, the Commission denies CenturyLink's Exception to this rule, and notes that the AAJ Authorities and CCOA agree with this position.

4. Rule 2143(j)(VII)

36. Rule 2143(j)(VII) states "Following the restoration of PSAP service, the BESP shall notify each affected governing body or PSAP whether call back phone numbers are available for calls that were made to 9-1-1 but could not be delivered due to the disruption. If available, these call back numbers shall be provided to each governing body or PSAP within two hours of the restoration of service. When possible, this information should also include location information. The BESP must provide this information to the governing body or PSAP without requiring a request from the governing body or PSAP."

37. This Rule strengthens the previous Rule language, which was "Following the restoration of BES, the BESP shall notify each affected governing body or PSAP whether call back phone numbers are available for calls that were made to 9-1-1 but could not be delivered due to the outage. If available, these call back numbers shall be provided to each governing body or PSAP within two hours of the restoration of service. When possible, this information should also include location information."¹³

38. Commission Staff recommended the change to the rule because CenturyLink had previously asserted, in informal outage investigations, that this information would only be provided to PSAPs upon request.

¹³ Rule 2143(j)(V), 4 CCR 723-2.

a. Exceptions

39. Through its Exceptions, CenturyLink takes the position that this rule "imposes on the BESP the onerous burden of providing the call back number within two hours of service restoration with no evidence that the requirement benefits the PSAP or the public."¹⁴

40. CenturyLink further states that calling back a number after potential delays of hours has low value. CenturyLink states "[q]uite likely the emergency that has prompted the 9-1-1 call is over, making the value of a callback negligible."¹⁵

41. CenturyLink also states that "PSAPs have rarely, if ever, expressed any interest in callback information."¹⁶

42. CenturyLink proposes to modify the rule to make the provision of call back numbers conditional upon request instead of automatic.

b. Findings and Conclusions

43. The Commission finds CenturyLink's position to be erroneous and potentially dangerous and harmful to the public interest. In this exception, CenturyLink makes an assumption that the caller would have either already gotten help or would no longer need help by the point that the callback number could be delivered. Calls to 9-1-1 where the caller cannot speak do occur, and the provision of ANI/ALI information to the PSAP ensures that the PSAP can send emergency services to investigate.

44. Calls made to 9-1-1 that are undelivered have the potential to result in a loss of life or property that may not have occurred if the call had been delivered or if call information were to be provided after the fact.

¹⁴ CenturyLink Exceptions, p. 5.

¹⁵ Id.

¹⁶ Id.

45. It is imperative that PSAPs have call back numbers for these calls as soon as possible following a PSAP service disruption, and it is incumbent upon the BESP to provide these numbers without requiring a request from the PSAP or governing body.

46. In short, it is the Commission's position that every 9-1-1 call placed by a citizen in this state should be received by a PSAP, and when this cannot happen, the PSAP should have the opportunity to send first responders to investigate as soon as the call information is available.

47. The Commission notes regarding CenturyLink's claim that this information is rarely requested that PSAPs and governing bodies may simply not have been aware that such data was available. Furthermore, PSAPs and governing bodies may choose not to act on call data provided after a PSAP service disruption, but they would not have the choice if the information is not provided at all.

48. CCOA, in its reply comments to CenturyLink's Exceptions, cites CenturyLink Tariff No. 25, which states that CenturyLink "shall comply with 4 CCR 723-2 § 2143(h) and provide call back information, including ALI information when possible, within two hours of the restoration of basic emergency service."¹⁷ This tariff provision exists despite the fact that, to the Commission's knowledge, CenturyLink has never provided such callback information to a PSAP automatically.

49. For these reasons, the Commission finds it necessary to strengthen this rule for potential future enforcement rather than weaken it and denies CenturyLink's Exception to this rule.

5. Rule 2143(j)(VIII)

50. Rule 2143(j)(VIII) states "In the event of a confirmed PSAP service disruption of more than four hours duration, or 12 hours in duration if the disruption is due to a fiber cut, the

¹⁷ CCOA Response, citing CenturyLink Tariff No. 25, Original Page 35, 9.2.5(A)(8).

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BESP shall provide a credit equal to the ratio of hours of the full duration of the disruption in hours to the total number of hours in the billing cycle. The credit shall be provided within no more than two billing cycles to the governing body or PSAP that normally receives the bill. If, as the result of a formal complaint proceeding or other proceeding, the Commission finds that a BESP has failed to provide a credit required under this paragraph, the Commission may order the amount of the credit to be doubled. The BESP must provide billing credits required under this rule automatically, without requiring a request from the governing body or PSAP. Additionally, civil penalties may be assessed ad described in rules 2009 through 2011."

51. Through her Recommended Decision, the ALJ stated that the changes to this rule "seeks to accomplish two goals: ensure that BESPs timely provide bill credits to reflect poorer quality BES, and, notably, to motivate BESPs to resolve service disruptions as quickly as possible to maintain higher quality BES. Both goals directly speak to the Commission's compelling interest to protect the public health, welfare, and safety."¹⁸

a. Exceptions

52. Through its Exceptions, CenturyLink takes the position that billing credits should not begin to accrue until after the four-hour repair window or, in the case of fiber cut, the 12-hour repair window.

53. CenturyLink proposes a modification to the rule to say "...the BESP shall provide a credit equal to the ratio of hours of the full duration of the disruption in hours *less four hours or, in the case of a fiber cut, less 12 hours,* to the total number of hours in the billing cycle" (italics added to indicate proposed modification).

¹⁸ See Recommended Decision ¶ 88.

b. Findings and Conclusions

54. The Commission sees the imposition of billing credits as a method of incentivizing CenturyLink to minimize both the frequency and duration of PSAP service disruptions. To this end, it is appropriate to assess billing credits from the start of a PSAP service disruption. A window for allowance of repair time is built into this rule: four hours, or in the case of fiber cut, twelve hours.

55. Additionally, the Commission notes that, to its knowledge, CenturyLink has failed to pay a single billing credit under the current rules, which have been in effect since March 30, 2023.

56. For the reasons stated above, the Commission finds it prudent to strengthen this rule rather than to weaken it at this time and denies CenturyLink's Exception to this rule.

6. Rule 2143(k)

57. Rule 2143(k) states: "Commission staff shall commence an informal investigation regarding each confirmed or possible PSAP service disruption meeting the below criteria, despite the dispute resolution process in the BESP's tariff, if any. The 9-1-1 Advisory Task Force may participate in the investigation. (I) Informal investigations are required when the service disruption meets any of the following criteria: (A) multiple PSAPs are affected; (B) the details of the service disruption, such as the cause, the beginning and end times, and the implemented mitigation strategies are unclear from the information available to Commission staff; (C) the service disruption lasted longer than four hours; (D) there was an apparent failure to notify the PSAP as required by subparagraph 2143(j)(I); (E) there were repeated service disruptions of a similar nature or in the same area within a 30-day period; (F) at the request of one or more affected PSAP or governing body; or (G) when there was a possible violation of a Commission rule."

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58. In her Recommended Decision, the ALJ specifically states "As modified, the ALJ finds that the criteria set reasonable limits on when an investigation must occur. These limits dispel arguments that the Commission must investigate any service disruption. The ALJ does not adopt changes to make investigations discretionary because the adopted criteria already limit the circumstances under which an investigation is needed, and doing so would create needless uncertainty as to the circumstances under which the Commission will investigate."¹⁹

a. Exceptions

59. Through its Exceptions, CenturyLink takes the position that Commission staff should have the flexibility to initiate information investigations or not, even when PSAP service disruptions would otherwise meet the criteria for an investigation.

60. CenturyLink proposes changing the word "shall" to "may" in the first sentence of Rule 2143(k).

61. CenturyLink asserts that "In 2023 only a very small percentage of the events investigated could be traced back to a failure in the BES network. In 2024, only one of the events identified was related to a BES network impact."²⁰

b. Findings and Conclusions

62. The Commission notes that CenturyLink made the same argument in its comments filed in this Proceeding that were addressed by the ALJ in her Recommended Decision. CCOA objects to this suggestion and notes that CenturyLink made a similar argument in a 2022 rulemaking proceeding, which was rejected.²¹

¹⁹ Recommended Decision, ¶ 92.

²⁰ CenturyLink Exceptions, p. 7.

²¹ See Recommended Decision ¶ 84.

63. One of the primary purposes of such investigations contemplated by this rule is to identify trends, frequent causes of disruptions, and areas for improvement in the delivery of BES. Investigations for such purposes must be performed consistently.

64. The Commission notes that a review of statistics provided by Commission staff on the 9-1-1 Program website indicates that as of this date, since the beginning of the informal investigation process in March 2023, 29 investigations have been completed, and 20 of those investigations, or 69 percent, were determined by Commission staff to have been BES Outages under the current Commission rules, or PSAP service disruptions, as they would be classified under the proposed rules.²² Based on these statistics, the Commission concludes that the investigation process set forth in Rule 2143(k) is producing useful analysis and review of outages or disruptions, and should continue to be conducted in a consistent manner.

65. Based on the reasoning above as well as the arguments of CCOA and AAJ, the Commission determines that continuing to require Commission staff to conduct investigations of all incidents that meet the criteria set forth in the rules is a prudent measure.

66. For the reasons stated above, the Commission denies CenturyLink's Exception to this rule.

II. <u>ORDER</u>

A. The Commission Orders That:

1. The exceptions to Recommended Decision No. 24-0403, filed by Lumen doing business as CenturyLink QC ("CenturyLink") on July 3, 2024, are denied, consistent with the discussion above.

²² <u>https://sites.google.com/state.co.us/colorado911program/basic-emergency-service</u>

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2. The Rules amending the Colorado Public Utilities Commission's (the "Commission") Rules Regulating Telecommunications Services and providers of Telecommunications Services, 4 *Code of Colorado Regulations* ("CCR") 723-2 (the "Rules"), relating to basic emergency service in Rules 2131, 2134, 2136, 2143, and rule 2335, 4 CCR 723-2 are adopted. The adopted rules are attached to this Decision in legislative format (*i.e.* strikeout/underline) as Attachment A, and in final format as Attachment B, and are available through the Commission's Electronic Filings system at:

https://www.dora.state.co.us/pls/efi/EFI.Show Docket?p session id=&p docket id=23R-0577T

3. Subject to a filing of an application for rehearing, reargument, or reconsideration, the opinion of the Attorney General of the State of Colorado shall be obtained regarding constitutionality and legality of the rules as finally adopted. A copy of the final, adopted rules shall be filed with the Office of the Secretary of State. The rules shall be effective 20 days after publication in The Colorado Register by the Office of the Secretary of State.

4. The 20-day time period provided by § 40-6-114, C.R.S., to file an application for rehearing, reargument, or reconsideration shall begin on the first day after the effective date of this Decision.

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5. This Decision is effective immediately on its Issued Date.

B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING August 7, 2024.



ATTEST: A TRUE COPY

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Rebecca E. White, Director

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

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MEGAN M. GILMAN

TOM PLANT

Commissioners