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January 8, 2024

VIA EMAIL

Maria Robinson
Director, Grid Deployment Office
U.S. Department of Energy
electricity.exports@hq.doe.gov

Re: Application of Second Foundation US Trading, LLC for Authorization to Export Electricity to Mexico

Dear Ms. Robinson:

Enclosed for filing is the “Application of Second Foundation US Trading, LLC for Authorization to Transmit Electric Energy to Mexico.” The filing fee of \$500.00 has been paid electronically via Pay.gov. A copy of the application is being served contemporaneously on the Federal Energy Regulatory Commission as required of wholesale power marketers by 10 C.F.R. § 205.309.

If you have any questions regarding the Application, or if you require additional information, please contact the undersigned at 202-626-5574.

Thank you for your assistance in this matter.

Respectfully submitted,

/s/ Zori G. Ferkin
Zori G. Ferkin

*Attorney for Second Foundation US Trading,
LLC*

Enclosures
cc: Federal Energy Regulatory Commission

**UNITED STATES OF AMERICA
BEFORE THE DEPARTMENT OF ENERGY
GRID DEPLOYMENT OFFICE**

Second Foundation US Trading, LLC

Docket No. EA-____

**APPLICATION OF SECOND FOUNDATION US TRADING, LLC FOR AUTHORITY
TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

Pursuant to Section 202(e) of the Federal Power Act (“FPA”), 16 U.S.C. § 824a(e), and 10 C.F.R. §§ 205.300, *et seq.*, Second Foundation US Trading, LLC (“Applicant” or “SFUST, LLC”) hereby submits this application for blanket authorization to export electricity from the United States to Mexico for a term of five years (“Application”).

In order to have all necessary authorizations in place to be able to start trading activities at the earliest possible time, Applicant further respectfully requests that the Department act expeditiously on this Application and make the authority sought by this Application effective no later than 90 days after the date of this Application, or April 7, 2024. To the extent necessary, Applicant respectfully requests waiver of the requirement to file this Application six (6) months in advance of the authorization requested herein.

In accordance with 10 C.F.R. §§ 205.302, Applicant states the following:

a) Exact Legal Name of Applicant. The exact legal name of the applicant is Second Foundation US Trading, LLC.

b) Legal Name of All Partners and Description of Applicant. Applicant does not have any partners, and is not seeking authorization to export power on behalf of, or in conjunction with any partners or partnership.¹ Applicant is a limited liability company organized under the laws of the State of Delaware with its principal place of business located in Houston,

¹ 10 CFR § 250.302.

Texas, USA. Applicant is owned 100% by Second Foundation Holding a.s., a joint-stock company organized under the laws of the Czech Republic (“SF Holding”). Through various subsidiaries, SF Holding trades electricity and commodities in 18 European countries and enters into agreements for the purchase of electricity for resale in the European markets with owners of solar and wind generation assets located in Germany and the Baltics. The majority of the voting shares in SF Holding are owned and controlled by WXZ13 a.s., a company organized under the laws of the Czech Republic which, in turn, is owned and controlled 100% by Trntr s.r.o. (“Trntr”), a company organized under the laws of the Czech Republic. Trntr is wholly owned and controlled by Vojtěch Kačena, an individual and citizen of the Czech Republic. Vojtěch Kacena does not have any ownership or involvement in the global energy industry other than his indirect ownership interests in Second Foundation.

Applicant is a power marketer engaged in the business of marketing and trading electric energy and other energy related products in the United States. Applicant is authorized to sell wholesale electric energy, capacity and ancillary services at market-based rates pursuant to authority granted by the Federal Energy Regulatory Commission (“FERC”) under a wholesale power sales tariff currently on file with FERC in Docket No. ER22-2959-000.² Applicant does not own any franchised service territory, and does not control any electric generation or transmission facilities in the United States. Applicant has no other affiliates or upstream owners that own any franchised service territory, or control any electric generation or transmission facilities in the United States.

² A copy of Applicant’s FERC Market Based Rate Tariff is attached to this Application as [Attachment 1](#).

c) Persons to Whom Correspondence Shall be Addressed:

Jakub Sedlacek
Chief Operating Officer
Second Foundation US Trading, LLC
808 Travis St., Suite 1030,
Houston, TX 77002
Tel: (832) 707 4529
jakub.sedlacek@second-foundation.com

Zori G. Ferkin
King & Spalding LLP
1700 Pennsylvania Avenue, Suite 900
Washington, DC 20006
Tel: (202) 626-5574
Fax: (202) 626-3737
zferkin@kslaw.com

d) State or Territory of Incorporation.

Applicant is organized as a limited liability company under the laws of the State of Delaware. Applicant is authorized to do business in the State of Delaware and such other states as required by the current nature of its business.

e) Governmental Agencies Having Jurisdiction. Under Section 202(e) of the FPA, 16 U.S.C. § 824a(e), and DOE's regulations, 10 C.F.R. § 205.300 et seq., any person seeking to transmit electric energy from the United States to a foreign country must first secure an order from DOE authorizing the export. No other known Federal, State, or local government agency has jurisdiction over the actions to be taken under the authority sought in this Application.

f) Description of the Transmission Facilities. Applicant intends to export electricity over existing international transmission facilities between Mexico and the United States, as identified in Exhibit C. Applicant requests authority to export electricity to Mexico over any international transmission facility authorized by Presidential Permit that is appropriate for open access by third parties in accordance with the assessment made by DOE of the transmission

limits for operation in the export mode.

g) Technical Discussion of the Proposed Export of Electricity. Applicant seeks blanket authority to transmit electric power to Mexico as a power marketer. Section 202(e) of the FPA provides that proposed exports will be authorized unless “the proposed transmission would impair the sufficiency of electric supply within the United States or would impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the Commission.”³

With regard to the first criterion, the sufficiency of electric power within the United States, DOE has interpreted this standard to require that “sufficient generating capacity must exist such that the exporter could sustain the export while still maintaining adequate generating reserves to meet all native load obligations.”⁴ As a power marketer, Applicant will purchase surplus electric energy to be exported from a variety of entities within the United States including power marketers, wholesale generators, electric utilities, and federal power marketing agencies. Because Applicant has no franchised service territory and therefore no native load obligations, and the power it proposes to purchase and export is surplus to the needs of those entities selling electric power to Applicant, the proposed export of electricity will not impair the sufficiency of electric supply within the United States and meets the first statutory criterion of Section 202(e).

With regard to the second criterion, whether the transaction would impede the coordination in the public interest of facilities subject to the jurisdiction of the Commission, DOE has interpreted this standard to address “the operational reliability of the domestic electric transmission system.”⁵

Applicant will obtain any necessary regulatory approvals required in order to schedule

³ 16 U.S.C. § 824a(e).

⁴ See, e.g., *E-T Global Energy, LLC*, Order No. EA-381 (June 10, 2011).

⁵ *Id.*

and deliver power exports in compliance with this requirement. Specifically, Applicant will schedule its transactions with the appropriate balancing authority areas and will comply with the reliability criteria, standards and guidelines established by the North American Electric Reliability Corporation (NERC) and its member Regional Entities in effect at the time of export. All electricity exported by Applicant will be transmitted pursuant to arrangements with utilities that own and operate existing transmission facilities and will be consistent with all applicable export limits on transmitting facilities, including those of the border facilities used, and with other terms and conditions contained in existing Presidential Permits and electricity export authorizations associated with these transmission facilities. Thus, Applicant meets the second statutory criterion of Section 202(e).

In previous orders granting export authorization to electric power marketers, DOE declined to rigidly apply the information filing requirements contained in its regulations and instead used a flexible approach which takes into consideration the unique nature of power marketers, the requirements of FERC Order No. 888 and previously authorized export limits of cross-border facilities.⁶ These same considerations demonstrate that the exports proposed by Applicant will not impair or tend to impede the sufficiency of electricity supplies in the United States or the regional coordination of electric utility planning or operations.

Applicant will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to carry out any power exports. Applicant also commits to comply fully with the terms and conditions of any export authorization granted to it

⁶ See, e.g., *Powerex Corp.*, Order No EA-171-E (Sept. 10, 2020); *Roctop Investments Inc.*, Order No. EA-414-A (Sept. 29, 2020); *Manitoba Hydro*, Order No. EA-281-C (Nov. 10, 2020); *Vitol Inc*, Order No. EA 370-B (Nov. 10, 2020); *CWP Energy, Inc.*, Order No. EA-410-B (Dec. 9, 2020); *MAG Energy Solutions, Inc.*, Order No. EA-306-C (Jan. 12, 2021); *Mercuria Energy America, LLC*, Order No. EA-487 (Jan. 21, 2021); *Direct Energy Marketing Inc.*, Order No. EA-280-C (Feb. 1, 2021); *NRG Power Marketing LLC*, Order No. EA-220-D (Feb. 1, 2021).

by DOE and in accordance with all applicable laws including the provisions of the FPA and pertinent rules, regulations, and orders adopted or issued thereunder. Given that Applicant only intends to export power over existing transmission lines, this Application qualifies for a categorical exclusion under the Department's regulations implementing the National Environmental Policy Act of 1969.⁷

h) Verification. The signed verification of Jakub Sedlacek, Chief Operating Officer, Second Foundation US Trading, LLC, is attached to this Application as Attachment 2.

REQUIRED EXHIBITS, COPIES AND FILING FEE

In accordance with 10 C.F.R. §205.303,⁸ the following Exhibits are attached hereto:

- Exhibit A:** Agreements – Not applicable.⁹
- Exhibit B:** Legal opinion of King & Spalding, LLP, counsel to Applicant.
- Exhibit C:** Transmission System Information.¹⁰
- Exhibit D:** Non-U.S. Applicant's power of attorney – Not applicable.¹¹
- Exhibit E:** Statement of any corporate relationship or existing contract which in any way relates to the control or fixing of electric power rates – Not applicable.¹²
- Exhibit F:** Operating procedures regarding available capacity and energy – Not applicable.¹³

⁷ See 10 C.F.R. Part 1021, Subpart D, Appendix B, § B4.2 (2023) (providing a categorical exclusion for the “[e]xport of electric energy as provided by Section 202(e) of the [FPA] over existing transmission systems or using transmission system changes that are themselves categorically excluded”).

⁸ To the extent necessary, Applicant requests a waiver of the requirement to provide the exhibits that are noted as not applicable to this Application.

⁹ Currently there are no agreements with any Mexican utilities to export electricity.

¹⁰ Applicant owns no transmission or generation facilities and therefore a “general map showing the Applicant's overall electric system” per 10 C.F.R. §205.303(c) is not applicable. Moreover, Applicant will use existing and future DOE-approved transmission facilities available over the United States-Mexico border, and provides as Exhibit C transmission system information in lieu of maps.

¹¹ Applicant's principal place of business is in the United States, and therefore no designated agent residing within the United States is required.

¹² Applicant does not have any corporate relationship or existing contract between it and any other person, corporation, or foreign government, which in any way relates to the control or fixing of rates for the purchase, sale, or transmission of electric energy.

¹³ Because all of the electricity to be exported from the United States by Applicant is surplus energy purchased from electric utilities and other suppliers, Applicant requests waiver of the requirement set forth in 10 C.F.R. § 205.303(f) that it explain the Operating Procedures for informing neighboring electric utilities in the United States that capacity or electricity in excess of the requirements of Applicant is available prior to its delivery to the export purchaser.

In accordance with the requirements of 10 C.F.R. § 205.309, a copy of this Application will be provided to the Secretary of the Federal Energy Regulatory Commission. Payment in the amount of \$500.00 has been submitted to DOE General Collections via the Pay.gov website, as required under 10 C.F.R. § 205.309.

CONCLUSION

WHEREFORE, for the reasons stated herein, Second Foundation US Trading, LLC respectfully requests that the Department of Energy grant the requested authorization to transmit electric energy to Mexico for five (5) years.

Respectfully submitted,

/s/ Zori G. Ferkin

Zori G. Ferkin

King & Spalding LLP

1700 Pennsylvania Avenue, N.W.

Suite 900

Washington, DC 20006-4605

Tel: (202) 626-5574

zferkin@kslaw.com

*Counsel for Second Foundation US
Trading, LLC*

January 8, 2024

Neighboring utilities may be informed of any excess capacity and energy by participating in the competitive wholesale markets in the relevant areas.

EXHIBIT A: AGREEMENTS

Not applicable

EXHIBIT B: OPINION OF COUNSEL

January 8, 2024

VIA EMAIL

Maria Robinson
Director, Grid Deployment Office
U.S. Department of Energy
electricity.exports@hq.doe.gov

Re: Application of Second Foundation US Trading, LLC for Authorization to Export Electricity to Canada


Dear Ms. Robinson:

Pursuant to 10 C.F.R. § 205.303(b), as special counsel to Second Foundation US Trading, LLC, a Delaware limited liability company (the "Company"), for the purpose of providing this letter, we have reviewed the certificate of formation of the Company, the operating agreement of the Company, the Certificate of Officer attached hereto as Annex I and such other documents as we have deemed necessary in order to advise you that, as of the date hereof:

- 1) The proposed exports of electricity described in the Application are within the limited liability company powers of Second Foundation US Trading, LLC; and
- 2) Second Foundation US Trading, LLC has complied with or will comply with, in each case to the best of our knowledge based solely on the Certificate of Officer attached hereto as Annex I, all pertinent Federal and State laws regarding the matters contemplated in the referenced application.

The opinions set forth in opinion paragraph 1 herein are limited to the Delaware Limited Liability Company Act, excluding any judicial or administrative interpretations thereof and any rules and regulations promulgated thereunder, and the opinions set forth in opinion paragraph 2 herein are only as to federal laws of the United States and laws of relevant States within the United States, and we express no opinion as to the laws of any other jurisdiction. This opinion letter is given as of the date hereof, and we do not assume any obligation to review or update this opinion letter should the law or existing facts or circumstances change. This opinion letter is provided as special counsel for the Company solely to you for your exclusive use and is not to be made available to or relied upon by any other person or entity without our prior written consent.

Respectfully submitted,



King & Spalding LLP

ANNEX I -- CERTIFICATE OF OFFICER

This Certificate of Officer dated as of January 8, 2024 (this "Certificate") is made by the undersigned officer of Second Foundation US Trading, LLC, a Delaware limited liability company (the "Company") to King & Spalding LLP, who are relying on the truth and accuracy of the statements contained herein for the purposes of the opinion to be provided by King & Spalding LLP (the "Opinion") in connection with the Application of the Company for Authorization to Transmit Electric Energy to Canada (Docket No. EA-) dated as of January 8, 2024 (the "Application").

The undersigned hereby certifies that he is familiar with the facts herein certified and is duly authorized to certify the same. The undersigned hereby certifies to King & Spalding LLP the following:

- 1) I am the Chief Operating Officer of the Company and I have reviewed the Application of the Company, including the Opinion of King & Spalding LLP.
- 2) I have knowledge of the matters set forth in the Application.
- 3) The Company has complied with or will comply with all pertinent Federal and State laws regarding the matters contemplated in the referenced Application.
- 4) The Company has furnished to King & Spalding LLP (a) a true and correct copy of the Certificate of Formation of the Company, together with any and all amendments thereto, which Certificate of Formation has been duly executed, delivered and adopted, is in full force and effect on the date hereof and has not been amended, modified or rescinded; (b) a true and correct copy of the operating agreement of the Company, together with any and all amendments thereto, which operating agreement has been duly executed, delivered and adopted, is in full force and effect on the date hereof, has not been amended, modified or rescinded, and is the sole and entire "limited liability company agreement" as defined in the Delaware Limited Liability Company Act. The Company is not organized or formed in any jurisdiction other than the State of Delaware.

IN WITNESS WHEREOF, the undersigned has executed this Certificate as of the date first above written.

SECOND FOUNDATION US TRADING, LLC

By: 

Jakub Sedlacek
Chief Operating Officer

EXHIBIT C: TRANSMISSION SYSTEM INFORMATION

International Transmission Facilities Located at the U.S. – Mexico Border, Authorized by Presidential Permit, and Available for Open Access Transmission

Owner	Location	Voltage	Presidential Permit No.¹⁴
Comisión Federal de Electricidad	Falcon Dam, TX	138 KV	N/A
	Redford, TX	7.2 KV	PP-51
	Presidio, TX	13.8 KV	PP-03
Baja California Power, Inc.	Imperial Valley, CA	230 KV	PP-234
Generadora del Desierto – WAPA	San Luis, AZ	230 KV	PP-304*
AEP Texas Inc.	Brownsville, TX	138 KV	PP-425
		69 KV	PP-425
	Laredo, TX	138 KV	PP-423
		230 KV	PP-423
	Eagle Pass, TX	138 KV	PP-424
El Paso Electric Company	Diablo, NM	115 KV	PP-92
	Ascarate, TX	115 KV	PP-48
San Diego Gas & Electric	Miguel, CA	230 KV	PP-68
	Imperial Valley, CA	230 KV	PP-79
Sharyland Utilities	McAllen, TX	138 KV	PP-285
Nogales Transmission	Nogales, AZ	230 KV	PP-420*

*These transmission facilities have been authorized but are not yet constructed or operational.

¹⁴ These Presidential permit numbers refer to the generic DOE permit number and are intended to include any subsequent amendments to the permit authorizing the facility.

EXHIBIT D: NON-U.S. APPLICANT'S POWER OF ATTORNEY

Not applicable.

**EXHIBIT E: EXISTING RELATIONSHIP OR EXISTING CONTRACT RELATING TO
CONTROL OR FIXING OF RATES**

Not applicable.

EXHIBIT F: OPERATING PROCEDURES

Not applicable.

ATTACHMENT 1 – FERC MARKET-BASED RATE TARIFF

FERC rendition of the electronically filed tariff records in Docket No. ER22-02959-000

Filing Data:

CID: C011671

Filing Title: Baseline new

Company Filing Identifier: 1

Type of Filing Code: 400

Associated Filing Identifier:

Tariff Title: Market Based Rates

Tariff ID: 1

Payment Confirmation:

Suspension Motion: N

Tariff Record Data:

Record Content Description, Tariff Record Title, Record Version Number, Option Code:

Section 1, Market Based Rates, 0.0.0, A

Record Narrative Name:

Tariff Record ID: 10

Tariff Record Collation Value: 10 Tariff Record Parent Identifier: 0

Proposed Date: 2022-09-30

Priority Order: 500

Record Change Type: New

Record Content Type: 1

Associated Filing Identifier:

Second Foundation US Trading, LLC

Market-Based Rate Wholesale Power Sale

Tariff

1. Seller makes electric energy, electric capacity, and the following ancillary services available under this Rate Schedule FERC No. 1 (“Rate Schedule”) to any purchaser, except as prohibited below:
 - (a) PJM: Seller offers regulation and frequency response service, energy imbalance service, and operating reserve service (which includes spinning, 10-minute, and 30-minute reserves) for sale into the market administered by PJM Interconnection, L.L.C. (“PJM”) and, where the PJM Open Access Transmission Tariff permits, the self-supply of these services to purchasers for a bilateral sale that is used to satisfy the ancillary services requirements of the PJM Office of Interconnection.
 - (b) New York: Seller offers regulation and frequency response service, and operating reserve service (which include 10-minute non-synchronous, 30-minute operating reserves, 10-minute spinning reserves, and 10-minute non-spinning reserves) for sale to purchasers in the market administered by the New York Independent System Operator, Inc.
 - (c) New England: Seller offers regulation and frequency response service (automatic generator control), operating reserve service (which includes 10-minute spinning reserve, 10-minute non-spinning reserve, and 30-minute operating reserve service) to purchasers within the markets administered by

the ISO New England, Inc.

- (d) California: Seller offers regulation service, spinning reserve service, and non-spinning reserve service to the California Independent System Operator Corporation (“CAISO”) and to others that are self-supplying ancillary services to the CAISO.
- (e) Southwest Power Pool: Seller offers regulation service and operating reserve service (which include 10-minute spinning reserve and 10-minute supplemental reserve) for sale to the Southwest Power Pool, Inc. (“SPP”) and to others that are self-supplying ancillary services to SPP.
- (f) MISO: Seller offers regulation service and operating reserve service (which include 10-minute spinning reserve and 10-minute supplemental reserve) for sale to the Midcontinent Independent System Operator, Inc. (“MISO”) and to others that are self-supplying ancillary services to MISO.
- (g) Third-party ancillary services: Seller offers Regulation Service, Reactive Supply and Voltage Control Service, Energy and Generator Imbalance Service,

Operating Reserve-Spinning, Operating Reserve Supplemental, and Primary Frequency Response Service. Sales will not include the following: (1) sales to an RTO or an ISO, i.e., where that entity has no ability to self-supply ancillary services but instead depends on third parties; and (2) sales to a traditional, franchised public utility affiliated with the third-party supplier, or sales where the underlying transmission service is on the system of the public utility affiliated with the third-party supplier. Sales of Operating Reserve-Spinning and Operating Reserve-Supplemental will not include sales to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers, except where the Commission has granted authorization. Sales of Regulation Service and Reactive Supply and Voltage Control Service will not include sales to a public utility that is purchasing ancillary services to satisfy its own open access transmission tariff requirements to offer ancillary services to its own customers, except at rates not to exceed the buying public utility transmission provider’s OATT rate for the same service or where the Commission has granted authorization.

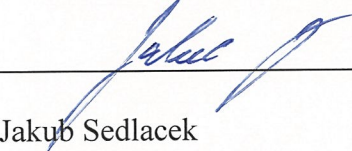
2. Applicability. This Rate Schedule is applicable to all wholesale sales by Seller of electric energy, electric capacity, and ancillary services listed in Section 1 of this Rate Schedule not otherwise subject to a tariff or rate schedule of Seller that is on file with the Commission.
3. Rates. All sales shall be made at rates established by agreement between the purchaser and Seller.
4. Other Terms and Conditions. All other terms and conditions of sales shall be established by agreement between the purchaser and Seller.

5. Revisions. This Rate Schedule may be revised by Seller by unilaterally making the appropriate filing with the Commission pursuant to the provisions of Section 205 of the Federal Power Act.
6. Duration. This Rate Schedule shall continue to be effective until terminated or changed. Such termination or change shall take effect in accordance with the applicable regulatory requirements.
7. Compliance with Commission Regulations. Seller shall comply with the provisions of 18 C.F.R. Part 35, Subpart H, as applicable, and with any conditions the Commission imposes in its orders concerning Seller's market-based rate authority, including orders in which the Commission authorizes Seller to engage in affiliate sales under this Rate Schedule or otherwise restricts or limits the Seller's market-based rate authority. Failure to comply with the applicable provisions of 18 C.F.R. Part 35, Subpart H, and with any orders of the Commission concerning Seller's market-based rate authority, will constitute a violation of this Rate Schedule.
8. Limitations and Exemptions Regarding Market-Based Rate Authority.
In *Second Foundation US Trading, LLC*, Docket No. ER22-_-000, the Commission granted Seller the following waivers and blanket authorization:
- (a) Waiver of the accounting, reporting, and other requirements of 18 C.F.R. Parts 41 (accounts, records and memorandum), 101 (uniform system of accounts)

with the exception that waiver of the provisions of Part 101 that apply to hydropower licensees is not granted with respect to licensed hydropower projects, and 141 (statement and reports), except Sections 141.14 and 141.15;
 - (b) Waiver of the reporting requirements of Subparts B and C of Part 35 of the Commission's Regulations, except Sections 35.12(a), 35.13(b), 35.15 and 35.16; and
 - (c) Blanket authorization under 18 C.F.R. Part 34 of all future issuances of securities and assumptions of liability.
9. Seller Category. Seller is a Category 1 Seller as defined in 18 C.F.R. § 35.36(a) in all regions.
10. Effective Date. This Rate Schedule is effective upon the date specified by the Commission.

ATTACHMENT 2 – VERIFICATION

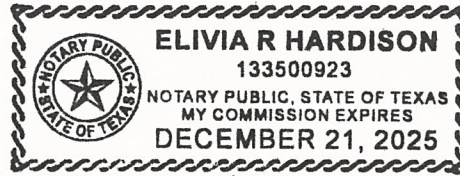
I, Jakub Sedlacek, being first duly sworn, state that I am Chief Operating Officer of Second Foundation US Trading, LLC; that I am authorized to execute this verification; that I have read the foregoing Application of Second Foundation US Trading, LLC for Authorization to Transmit Electric Energy to Canada and its exhibits and am familiar with the contents thereof and have knowledge of the matters set forth therein, and hereby verify that the contents thereof and all of the statements contained therein are true and correct to the best of my knowledge, information and belief.

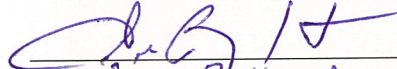


Jakub Sedlacek

NOTARIZATION:

Signed and sworn to before me this 8th day of January, 2024.





Elivia R. Hardison

Notary Public
My Commission Expires: 12/21/2025