

ORIGINAL
OPEN MEETING
MEMORANDUM



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TO: THE COMMISSION
FROM: Utilities Division
DATE: February 17, 2005
RE: IN THE MATTER OF THE APPLICATION OF SOUTHWEST GAS CORPORATION FOR PRE-APPROVAL OF COST RECOVERY FOR PARTICIPATION IN THE EL PASO NATURAL GAS COMPANY LINE 1903 PIPELINE PROJECT (DOCKET NO. G-01551A-04-0807)

Southwest Gas Corporation ("Southwest" or "Company") has submitted an Application for pre-approval of cost recovery for participation in the El Paso Natural Gas Company Line 1903 pipeline project. The attached staff report provided gives a detailed account of Staff's analysis and recommendations.

Ernest G. Johnson
Director
Utilities Division

EGJ:RGG:red:JA

ORIGINATOR: Bob G. Gray

Arizona Corporation Commission
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Staff Report on Southwest Gas Corporation Filing for Pre-
Approval of Cost Recovery for Participation in the El Paso
Natural Gas Company Line 1903 Pipeline Project

February 17, 2005

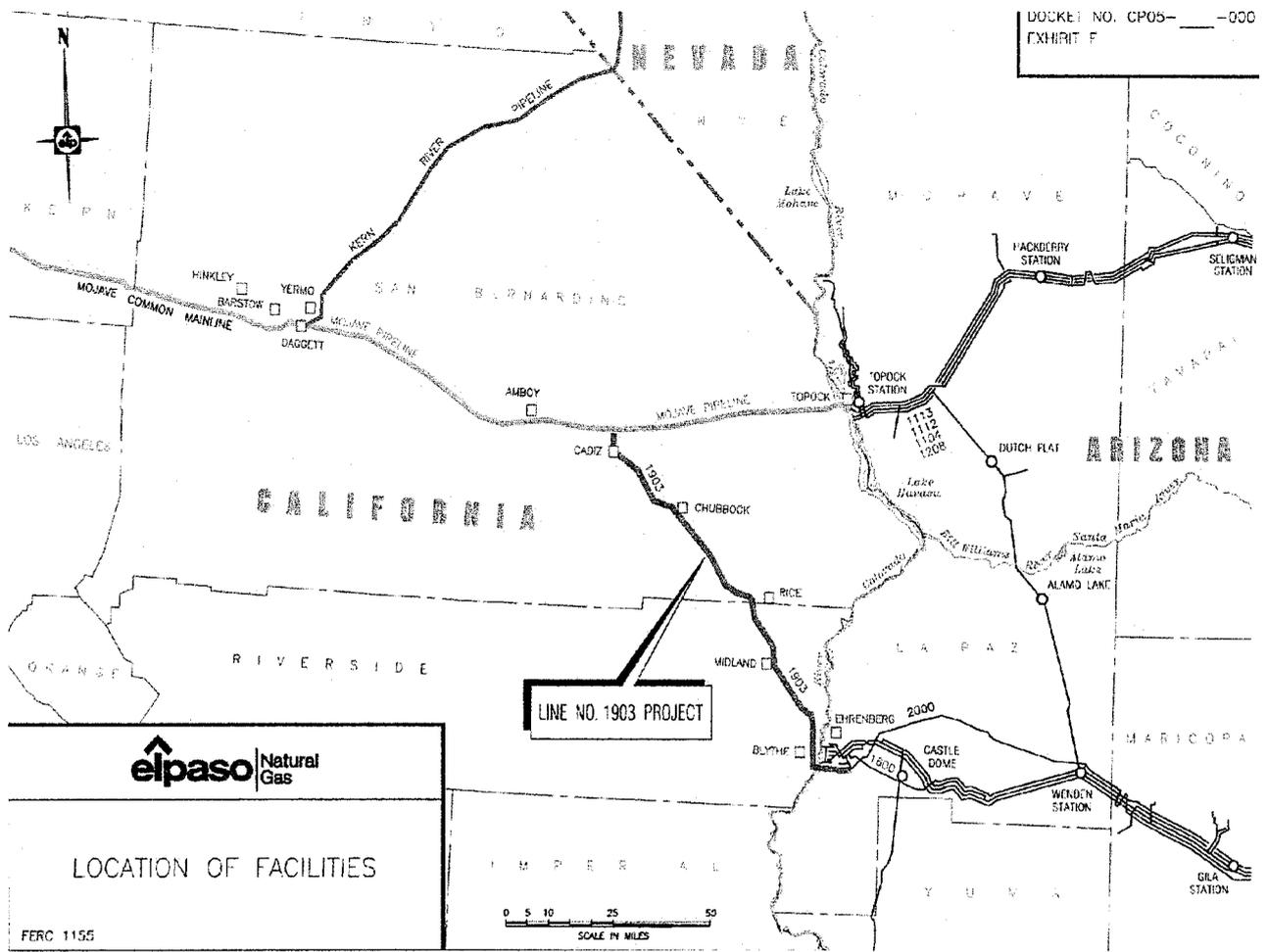
Docket No. G-01551A-04-0807

TABLE OF CONTENTS

| | <u>PAGE</u> |
|---|--------------------|
| INTRODUCTION | 3 |
| DESCRIPTION OF THE LINE 1903 PIPELINE PROJECT | 5 |
| BACKGROUND..... | 6 |
| THE COMMISSION NOTICE OF INQUIRY ON NATURAL GAS INFRASTRUCTURE..... | 7 |
| APPLICABILITY OF PRE-APPROVAL IN THIS FILING | 10 |
| CONCLUSIONS AND RECOMMENDATIONS | 11 |

Introduction

On November 9, 2004, Southwest Gas Corporation (“Southwest” or “Company”) filed for Arizona Corporation Commission (“Commission”) pre-approval of cost recovery for participation in El Paso Natural Gas Company’s (“El Paso”) Line 1903 natural gas pipeline project. The Line 1903 project would convert a section of a former crude oil pipeline in southern California which in conjunction with other arrangements would enable a shipper on the El Paso northern system with pipeline capacity to Topock to deliver gas onto the El Paso southern system at Ehrenberg. Southwest’s filing is pursuant to the Commission’s on-going Notice of Inquiry on Natural Gas Infrastructure, which the Commission initiated in April, 2003, to consider issues related to natural gas infrastructure and their impact on natural gas service in Arizona. This Staff Report represents Staff’s evaluation and recommendations regarding this Southwest filing.



Source: Southwest Gas

Description of the Line 1903 Pipeline Project

The Line 1903 project involves conversion of a segment of the old All American crude oil pipeline running from Ehrenberg, Arizona to near Cadiz, California to natural gas service. The segment of the old All American running from McCamey, Texas to Ehrenberg, Arizona was previously converted by El Paso and is known as El Paso's Line 2000, which was put into service as part of the capacity reallocation proceedings at the Federal Energy Regulations Commission ("FERC") in recent years. The Line 1903 project involves approximately 88 miles of pipeline as well as some additional facilities to interconnect Line 1903 with El Paso's Mojave pipeline near Cadiz. The Mojave pipeline runs from Topock at the Arizona/California border to the Bakersfield area. In total the Line 1903 project entails conversion of Line 1903 to natural gas service, acquisition of Mojave pipeline capacity by El Paso, construction of the interconnect between Line 1903 and the Mojave pipeline, and modification of Kern River pipeline facilities at Daggett, California to enable gas to flow from Daggett eastward on the Mojave pipeline.

El Paso filed for FERC approval of the Line 1903 project (Docket No. CP05-2) on October 5, 2004. The projected in-service date for the Line 1903 project is January 1, 2006. El Paso's projected cost for the Line 1903 project would be approximately \$73.6 million. The project would provide 502,000 Cubic Feet of gas ("mcf/day") of pipeline capacity. This would include approximately 189,000 mcf/day of capacity to deliver gas from the Kern River pipeline at Daggett, approximately 182,000 mcf/day of capacity to move north system gas supplies at Topock down to the southern system, and approximately 130,000 mcf/day of capacity to mitigate existing north-south displacement concerns.

Background

FERC in recent years has conducted a reallocation of El Paso pipeline capacity amongst the various shippers on the pipeline, including Southwest. Southwest received a variety of different pieces of pipeline capacity. One type of pipeline capacity which Southwest received is Block 2 capacity that went from the San Juan supply basin in northwest New Mexico to the Topock delivery point at the Arizona/California border. Block 2 capacity has California recall rights which last through 2005. East of California shippers requested that as part of the capacity reallocation they be allowed to move their delivery point for such Block 2 capacity from Topock to their locations on El Paso's southern system where their actual gas demands are. However, FERC did not allow movement of the delivery points in the reallocation process, in effect stranding the north line San Juan to Topock capacity. Currently El Paso's two north to south crossovers, the Havasu Crossover and the Maricopa Lateral are both fully subscribed. Therefore Southwest can only use space on the crossovers to the extent the existing capacity holders do not utilize their capacity rights. As such, to the extent Southwest can move gas related to the San Juan to Topock capacity to the southern system, it can only currently be done on what is in essence interruptible service.

Acquisition of capacity on the Line 1903 project would enable Southwest to take gas on its San Juan to Topock capacity south on first the Mojave pipeline and then onto Line 1903, which would provide delivery onto El Paso's southern system. Acquisition of the Line 1903 capacity would in effect "firm up" the current San Juan to Topock capacity which cannot currently be relied on to serve southern system delivery points on a firm basis. Line 1903 capacity would also provide Southwest with the opportunity to access Rockies gas via the Kern River pipeline at Daggett, California on a flow path secondary basis.

Southwest entered into a precedent agreement with El Paso for Line 1903 capacity on August 16, 2004. Southwest would receive an average of 75,548 decatherm ("dth") of pipeline capacity on Line 1903. If terms of the precedent agreement are met, Southwest would enter into a 10 year transportation service agreement with El Paso for the Line 1903 capacity.

The Commission Notice of Inquiry on Natural Gas Infrastructure

On April 15, 2003, the Commission initiated its Notice of Inquiry ("NOI") on natural gas infrastructure, issuing a list of questions to solicit input from interested parties. A total of 20 parties provided responses to the NOI questions. On September 10, 2003, the Commission held a workshop regarding the NOI on natural gas infrastructure. Prior to the workshop, Commission Staff had circulated a strawman proposal for discussion at the workshop. Following the September 10, 2003 workshop, the Commission solicited an additional round of comments from interested parties regarding the strawman proposal and other issues discussed at the workshop. Comments were received from 17 parties following the September 10, 2003 workshop.

On December 18, 2003, the Commission issued its Policy Statement Regarding New Natural Gas Pipeline and Storage Costs. In this document, the Commission made specific policy statements about supply/infrastructure diversity, supply/infrastructure planning, the Commission approach to new infrastructure projects, the general Commission approach, individual utility circumstances, and reporting.

The policy statements included in the December 18, 2003 document are as follows:

I. Supply/Infrastructure Diversity

- 1. Diversity in Arizona's natural gas infrastructure, including interstate pipeline facilities, natural gas storage facilities, and related aspects of natural gas service, is beneficial and should be actively pursued by Arizona utilities as a way of providing greater supply reliability and flexibility and possible lower costs.*
- 2. Arizona utilities as a general principle should pursue a diverse natural gas supply portfolio which takes into account relevant factors including cost, reliability, flexibility, safety, and price stability.*
- 3. Arizona utilities should consider natural gas storage as an integral component of their efforts to develop a diverse natural gas supply portfolio, recognizing the variety of potential benefits of natural gas storage, including enhanced reliability, operational flexibility, more efficient use of pipeline capacity assets, and reduced natural gas price volatility.*
- 4. The current monopoly on interstate pipeline service in central and southern Arizona is not beneficial to the state of Arizona. The Commission encourages development of alternative natural gas supply options, including one or more new interstate pipelines and natural gas storage facilities. Reduction over time of Arizona's reliance on a single pipeline system reduces the risk to Arizona of operational, regulatory, or other problems which may occur in regard to any given pipeline system.*

II. Supply/Infrastructure Planning

- 1. Arizona utilities should plan for natural gas infrastructure needs on a long term basis, recognizing that some decisions may not necessarily lead to the lowest cost in the short term. Such planning should take into account the lead time necessary to construct and put in service natural gas infrastructure in Arizona.*
- 2. The Commission endorses voluntary efforts to analyze and plan for the present and future natural gas supply needs of Arizona and encourages Arizona utilities and others to actively participate in such activities.*

III. Commission Approach to New Infrastructure Projects

- 1. The Commission, as a general proposition chooses not to endorse specific infrastructure projects. The Commission believes that the region's natural gas consumers and infrastructure developers play a fundamental role in determining how to best address the region's infrastructure needs. The Commission anticipates continued active involvement in FERC proceedings related to Arizona's natural gas infrastructure, as the Commission deems appropriate.*

IV. General Commission Approach

- 1. The Commission NOI on natural gas infrastructure activities recognizes the jurisdiction and central role of FERC in developing new natural gas infrastructure in the Southwest and anticipates the Commission's NOI initiative as being complementary to FERC's activities, recognizing that both state and federal regulators can play a role in Arizona's natural gas infrastructure development.*
- 2. The Commission encourages open, on-going and substantive communication between Arizona utilities and the Commission as Arizona's natural gas infrastructure is developed in the coming years.*
- 3. At this time the Commission believes that the best method for the Commission to address natural gas infrastructure matters is to encourage utilities to file applications, including requests for alternate cost treatment, in order that the Commission can consider specific requests for cost recovery proposals appropriate to the circumstances for each individual application.*

V. Individual Utility Circumstances

- 1. As individual Arizona utilities consider their participation in the development of natural gas infrastructure, the Commission recognizes that each utility's circumstances and needs are unique and participation in natural gas infrastructure projects will vary accordingly.*

VI. Reporting

- 1. Reporting for any additional pipeline services should be consistent with the method and content of current reporting by utilities for their current pipeline services.*
- 2. Reporting requirements for natural gas storage activities will need to be developed, given the lack of current natural gas storage availability in Arizona. Utilities should work with Staff to develop the proper reporting format and content to be included in reports to the Commission, including possibly through existing monthly adjustor reports or other reporting methods as deemed appropriate.*

The document also discusses the Commission's consideration of alternate cost recovery methods, such as pre-approval, as well as the way such costs have traditionally been considered and that the traditional method is the preferred way.

On February 13, 2004, the Commission held another workshop regarding the NOI on natural gas infrastructure. Topics of discussion at the workshop included Arizona natural gas infrastructure issues, updates on pending pipeline and gas storage projects, and the National Petroleum Council study, *Balancing Natural Gas Policy: Fueling Demands of a Growing Economy*, which was issued in September 2003.

Applicability of Pre-Approval in this Filing

Southwest's application in this matter specifically requests Commission pre-approval of the costs identified in the application for recovery through Southwest's purchased gas adjustor ("PGA") mechanism. For the reasons discussed below, Staff does not recommend that the Commission grant Southwest's application for pre-approval for Line 1903.

A threshold issue to be considered in regard to this application is whether Commission pre-approval as contemplated in the Commission's December 18, 2003 Policy Statement Regarding New Natural Gas Pipeline and Storage Costs is warranted. The Commission's policy statement also notes that the specific circumstances of each application for pre-approval must be carefully considered. By its nature, Commission pre-approval is a process that should be limited to specific circumstances when such pre-approval is necessary and warranted. Previously the Commission has granted pre-approval of pipeline capacity acquisitions on the Silver Canyon pipeline by both Southwest and Arizona Public Service.

One purpose of the Commission's pre-approval process was to encourage utilities to make the best resource decisions taking into account both short and long term considerations regarding cost, service reliability, service flexibility, diversity, and other issues. A particular concern was that risk-averse utilities might make resource decisions which minimize costs in the short term, but do not fully capture other longer term benefits. This is based upon the concept that a utility acquiring a resource that is not the lowest cost resource at the time might consider itself to be subject to greater regulatory risk than if it had simply acquired the resource that was the lowest cost resource in the short term. This was the case in Southwest's Silver Canyon pre-approval filing. The up front reservation charge costs were higher than the current El Paso pipeline charges, but the Silver Canyon pipeline offered other benefits such as greater operational flexibility and pipeline diversity.

However, Staff does not believe that Southwest's participation in the Line 1903 project is a situation where it is necessary for the Commission to grant pre-approval and Staff recommends against pre-approval of Southwest's application. Although the Line 1903 project addresses certain goals of the Commission's gas infrastructure policy statement, such as diversifying Arizona's natural gas infrastructure, consideration of all factors presented in this matter indicates that pre-approval is not warranted.

Staff believes that Southwest's acquisition of Line 1903 capacity, as represented by Southwest, is more in the nature of a normal acquisition of pipeline capacity to more efficiently utilize its existing pipeline capacity portfolio, than it is in the nature of a major infrastructure acquisition requiring Commission pre-approval to overcome significant potential obstacles such as higher up front costs to make the project happen. Further, the Commission's December 18, 2003 policy statement indicates traditionally the Commission has not granted pre-approval and that the traditional method of the Commission evaluating the actions taken and the costs incurred by the utility at a later time is the preferred method. Staff believes that this traditional method of addressing the costs incurred by Southwest for Line 1903 capacity is appropriate in this circumstance.

In response to a Staff data request, Southwest indicated that its acquisition of Line 1903 capacity is considered to be a continuation of the conversion from full requirements capacity rights to contract demand capacity rights. Southwest further indicated that it was currently relying on this capacity to serve customers on an alternate basis and that acquisition of Line 1903 capacity is needed to serve existing demands. Southwest also indicated that due to these circumstances, the Line 1903 capacity was not evaluated in conjunction with other potential infrastructure projects or even that there are any alternative projects that could bring the pipeline capacity from Topock to the southern system in a timely manner.

It is clear that the Commission's policy statement on natural gas infrastructure contemplated pre-approval of natural gas infrastructure acquisitions would be limited to projects where a compelling case could be made that pre-approval would be necessary and play a significant role in moving the infrastructure project forward. Expansion of pre-approval beyond such cases could result in the Commission becoming overly involved in the on-going management of Southwest's pipeline capacity portfolio and would represent an expansion of the pre-approval concept beyond what was previously contemplated.

Conclusions and Recommendations

Given these circumstances, Staff believes that Southwest's acquisition of Line 1903 capacity simply does not require the Commission's pre-approval as contemplated under the Commission's natural gas infrastructure policy statement. Unlike the Silver Canyon project, there is no compelling basis to find that Southwest may face the higher cost risks or other potential cost-recovery issues if pre-approval is not granted. Further, even if the Commission does not pre-approve Southwest's acquisition of Line 1903 capacity, the capacity may be considered by the Commission in future reviews of Southwest's gas acquisition activities as would other aspects of Southwest's acquisition of natural gas and pipeline services. If the Commission wishes to pre-approve Southwest's acquisition of capacity on the Line 1903 project, Staff would recommend conditions similar to those adopted by the Commission in Southwest's Silver Canyon pipeline project pre-approval proceeding.

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BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM A. MUNDELL
Commissioner
MARC SPITZER
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner

IN THE MATTER OF THE APPLICATION)
OF SOUTHWEST GAS CORPORATION)
FOR PRE-APPROVAL OF COST)
RECOVERY FOR PARTICIPATION IN THE)
EL PASO NATURAL GAS COMPANY)
LINE 1903 PIPELINE PROJECT.)

DOCKET NO. G-01551A-04-0807
DECISION NO. _____
ORDER

Open Meeting
March 8 and 9, 2005
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. Southwest Gas Corporation ("Southwest") is engaged in providing natural gas service within portions of Arizona, pursuant to authority granted by the Arizona Corporation Commission ("Commission").
2. On November 9, 2004, Southwest filed for Commission pre-approval of cost recovery for participation in the El Paso Natural Gas Company's ("El Paso") Line 1903 natural gas pipeline project.
3. The Line 1903 project would convert a section of a former crude oil pipeline in southern California which in conjunction with other arrangements would enable a shipper on the El Paso northern system with pipeline capacity to Topock to deliver gas onto the El Paso southern system at Ehrenberg. Southwest's filing is pursuant to the Commission's on-going Notice of Inquiry on Natural Gas Infrastructure, which the Commission initiated in April 2003, to consider issues related to natural gas infrastructure and their impact on natural gas service in Arizona.

1 4. The Line 1903 project involves approximately 88 miles of pipeline as well as some
2 additional facilities to interconnect Line 1903 with El Paso's Mojave pipeline near Cadiz. The
3 Mojave pipeline runs from Topock at the Arizona/California border to the Bakersfield area. In
4 total, the Line 1903 project entails conversion of Line 1903 to natural gas service, acquisition of
5 Mojave pipeline capacity by El Paso, construction of the interconnect between Line 1903 and the
6 Mojave pipeline, and modification of Kern River pipeline facilities at Daggett, California to enable
7 gas to flow from Daggett eastward on the Mojave pipeline.

8 5. El Paso filed for Federal Energy Regulation Commission ("FERC") approval of the
9 Line 1903 project (Docket No. CP05-2) on October 5, 2004. The projected in-service date for the
10 Line 1903 project is January 1, 2006. El Paso's projected cost for the Line 1903 project would be
11 approximately \$73.6 million. The project would provide 502,000 cubic feet of gas ("mcf/day") of
12 pipeline capacity. This would include approximately 189,000 mcf/day of capacity to deliver gas
13 from the Kern River pipeline at Daggett, approximately 182,000 mcf/day of capacity to move
14 north system gas supplies at Topock down to the southern system, and approximately 130,000
15 mcf/day of capacity to mitigate existing north-south displacement concerns.

16 6. Southwest entered into a precedent agreement with El Paso for Line 1903 capacity
17 on August 16, 2004. Southwest would receive an average of 75,548 decatherm ("dth") of pipeline
18 capacity on Line 1903. If terms of the precedent agreement are met, Southwest would enter into a
19 10 year transportation service agreement with El Paso for the Line 1903 capacity.

20 7. Southwest's application in this matter specifically requests Commission pre-
21 approval of the costs identified in the application for recovery through Southwest's purchased gas
22 adjustor ("PGA") mechanism.

23 8. For the reasons discussed below, the Commission Utilities Division Staff ("Staff")
24 does not recommend that the Commission grant Southwest's application for pre-approval for Line
25 1903.

26 9. A threshold issue to be considered in regard to this application is whether
27 Commission pre-approval as contemplated in the Commission's December 18, 2003 Policy
28 Statement Regarding New Natural Gas Pipeline and Storage Costs is warranted. The

1 Commission's policy statement also notes that the specific circumstances of each application for
2 pre-approval must be carefully considered.

3 10. By its nature, Commission pre-approval is a process that should be limited to
4 specific circumstances when such pre-approval is necessary and warranted. Previously the
5 Commission has granted pre-approval of pipeline capacity acquisitions on the Silver Canyon
6 pipeline by both Southwest and Arizona Public Service.

7 11. One purpose of the Commission's pre-approval process was to encourage utilities
8 to make the best resource decisions taking into account both short and long term considerations
9 regarding cost, service reliability, service flexibility, diversity, and other issues.

10 12. A particular concern was that risk-averse utilities might make resource decisions
11 which minimize costs in the short term, but do not fully capture other longer term benefits. This is
12 based upon the concept that a utility acquiring a resource that is not the lowest cost resource at the
13 time might consider itself to be subject to greater regulatory risk than if it had simply acquired the
14 resource that was the lowest cost resource in the short term. This was the case in Southwest's
15 Silver Canyon pre-approval filing. The up front reservation charge costs were higher than the
16 current El Paso pipeline charges, but the Silver Canyon pipeline offered other benefits such as
17 greater operational flexibility and pipeline diversity.

18 13. However, Staff does not believe that Southwest's participation in the Line 1903
19 project is a situation where it is necessary for the Commission to grant pre-approval and Staff
20 recommends against pre-approval of Southwest's application. Although the Line 1903 project
21 addresses certain goals of the Commission's gas infrastructure policy statement, such as
22 diversifying Arizona's natural gas infrastructure, consideration of all factors presented in this
23 matter indicates that pre-approval is not warranted.

24 14. Staff believes that Southwest's acquisition of Line 1903 capacity, as represented by
25 Southwest, is more in the nature of a normal acquisition of pipeline capacity to more efficiently
26 utilize its existing pipeline capacity portfolio, than it is in the nature of a major infrastructure
27 acquisition requiring Commission pre-approval to overcome significant potential obstacles such as
28 higher up front costs to make the project happen.

1 15. Further, the Commission's December 18, 2003 policy statement indicates
2 traditionally the Commission has not granted pre-approval and that the traditional method of the
3 Commission evaluating the actions taken and the costs incurred by the utility at a later time is the
4 preferred method. Staff believes that this traditional method of addressing the costs incurred by
5 Southwest for Line 1903 capacity is appropriate in this circumstance.

6 16. In response to a Staff data request, Southwest indicated that its acquisition of Line
7 1903 capacity is considered to be a continuation of the conversion from full requirements capacity
8 rights to contract demand capacity rights. Southwest further indicated that it was currently relying
9 on this capacity to serve customers on an alternate basis and that acquisition of Line 1903 capacity
10 is needed to serve existing demands. Southwest also indicated that due to these circumstances, the
11 Line 1903 capacity was not evaluated in conjunction with other potential infrastructure projects or
12 even that there are any alternative projects that could bring the pipeline capacity from Topock to
13 the southern system in a timely manner.

14 17. It is clear that the Commission's policy statement on natural gas infrastructure
15 contemplated pre-approval of natural gas infrastructure acquisitions would be limited to projects
16 where a compelling case could be made that pre-approval would be necessary and play a
17 significant role in moving the infrastructure project forward. Expansion of pre-approval beyond
18 such cases could result in the Commission becoming overly involved in the on-going management
19 of Southwest's pipeline capacity portfolio and would represent an expansion of the pre-approval
20 concept beyond what was previously contemplated.

21 18. Given these circumstances, Staff believes that Southwest's acquisition of Line 1903
22 capacity simply does not require the Commission's pre-approval as contemplated under the
23 Commission's natural gas infrastructure policy statement.

24 19. Unlike the Silver Canyon project, there is no compelling basis to find that
25 Southwest may face the higher cost risks or other potential cost-recovery issues if pre-approval is
26 not granted. Further, even if the Commission does not pre-approve Southwest's acquisition of
27 Line 1903 capacity, the capacity may be considered by the Commission in future reviews of
28 Southwest's gas acquisition activities as would other aspects of Southwest's acquisition of natural

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ORDER

IT IS THEREFORE ORDERED that Southwest Gas Corporation's application for pre-approval of cost recovery for participation in the El Paso Natural Gas Companies Line 1903 natural gas pipeline project is hereby denied.

IT IS FURTHER ORDERED that this Order shall become effective immediately.

BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

| | | |
|--------------|--------------|--------------|
| CHAIRMAN | COMMISSIONER | COMMISSIONER |
| COMMISSIONER | COMMISSIONER | |

IN WITNESS WHEREOF, I BRIAN C. McNEIL, Executive Secretary of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this _____ day of _____, 2005.

BRIAN C. McNEIL
Executive Secretary

DISSENT: _____

DISSENT: _____

EGJ:BGG:red/JA

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