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BEFORE THE ARIZONA CORPORATION COMMISSION
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2009 MAY 13 P 3:29

AZ CORP COMMISSION
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Arizona Corporation Commission

DOCKETED

MAY 13 2009

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IN THE MATTER OF THE APPLICATION OF
THE BURLINGTON NORTHERN AND
SANTA FE RAILWAY COMPANY DBA
AUBREY WATER COMPANY FOR
APPROVAL OF A PERMANENT WATER
RATE INCREASE.

DOCKET NO. W-03476A-06-0425

**PETITION TO AMEND
DECISION NO. 69379
PURSUANT TO A.R.S. §40-252**

Pursuant to A.R.S. §40-252, the Burlington Northern and Santa Fe Railway Company, doing business as Aubrey Water Company ("Aubrey Water" or "Company"), through counsel undersigned, hereby petitions the Arizona Corporation Commission ("Commission") for an order amending Decision No. 69379 dated March 22, 2007 (the "Decision") to:

1. Permit Aubrey Water to immediately implement the permanent rate increase authorized by the Commission in the Decision;
2. Revise the condition set forth in the Decision that requires Aubrey Water to reduce water loss on its system to 10 percent or less; and
3. Finding that that the Company has complied with the Decision by establishing and maintaining its books and records in compliance with the NARUC USOA.

In support of its petition, Aubrey Water states the following:

I. BACKGROUND.

In Decision No. 58172 dated February 4, 1993, the Commission granted Aubrey Water a Certificate of Convenience and Necessity to provide water service in Yavapai County, Arizona. On March 22, 2007, the Commission issued the Decision in the above-

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1 captioned matter. The Decision approved a rate increase for Aubrey Water, but stayed
2 the implementation of the rate increase until such time as the Company completed three
3 compliance items, including the reduction in water loss on the Company's system to 10
4 percent.¹ To that end, the Decision required the Company to implement a Water Loss
5 Analysis Program ("Initial Program") and file water loss and monitoring reports each
6 January and July demonstrating the Company's progress in implementing the Initial
7 Program recommendations and reducing system water loss to 10 percent, as required in
8 the Decision. If the Company did not achieve 10 percent water loss on its system by
9 December 31, 2008, the Decision required the Company to file a Revised Water Loss
10 Analysis Program ("Revised Program") by February 28, 2009.

11 In an effort to comply with the Decision, Aubrey Water hired a new management
12 company, Southwestern Utility Management, Inc. ("Southwestern"), in May 2007 to run
13 its water system. On December 28, 2007, Aubrey Water filed with the Commission its
14 Initial Program. The Initial Program discussed Southwestern's extensive evaluation of
15 system water losses, including an analysis of whether the water losses were occurring as a
16 result of aging infrastructure or unaccounted for uses by customers. Based upon
17 Southwestern's information – which identified several meters that needed to be replaced
18 and the quarter-machine standpipe which did not have a meter resulting in thousands of
19 gallons of unaccounted for water use – the Company crafted the Initial Program to bring
20 the system into compliance with the Decision.

21 On January 31, 2008, the Company submitted its January 2008 Progress Report on
22 its Water Loss Analysis Program and its January 2008 Monitoring Report (collectively,
23 the "January 2008 Reports"). The January 2008 Reports show that the Company
24 replaced the south well meter on November 27, 2007. On July 31, 2008, the Company
25 submitted its July 2008 Progress Report on its Water Loss Analysis Program and its July

26 _____
27 ¹ Aubrey Water has since met the first two compliance items which required the Company to demonstrate
28 i) its compliance with Arizona Administrative Code, Title 18, Chapter 4; and ii) that its books and records
are in compliance with the NARUC USOA, although Staff must still file a memorandum regarding the
latter, pursuant to the Decision which is discussed below.

1 2008 Monitoring Report (collectively, the “July 2008 Reports”). The July 2008 Reports
2 show that the Company installed a new meter on the quarter machine standpipe on May
3 5, 2008. On January 30, 2009, Aubrey Water filed its January 2009 Water Loss Analysis
4 Program Progress Report and 2009 Monitoring Report with the Commission
5 (collectively, the “January 2009 Reports”). The January 2009 Reports show that the
6 Company implemented the remainder of the Initial Program recommendations. These
7 efforts included replacing unreadable or nonworking water meters, meter boxes, and
8 risers; regularly inspecting and repairing the distribution infrastructure, including the
9 replacement of 7 valves, repairing 5 main line leaks, and installing 2 additional meters on
10 water lines; replacing 2 leaking transfer station pumps; placing locks on 4 fire hydrants to
11 prevent unauthorized withdrawals; identifying and planning to replace rusted lines; and
12 replacing 4 leaking fire hydrants. Even with all of these system modifications, the
13 Company still has not been able to meet the desired 10 percent threshold for the calendar
14 year, but was able to reduce the water loss on the system to approximately 15 percent.

15 Out of concern for its inability to reduce water losses to the 10 percent level, the
16 Company met with Staff on February 19, 2009, to discuss its compliance efforts to date
17 and the Decision’s requirement that Aubrey Water file a Revised Program by February
18 28, 2009. The Company explained to Staff that despite its best efforts, as well as the
19 expenditure of significant money, the Company has not been able to consistently reduce
20 system losses to 10 percent. The Company also expressed a desire that rather than filing
21 and implementing an incomplete Revised Program, the Company would prefer to work
22 with Staff and the Commission to explore other options to reduce water loss to levels
23 consistent with a system of comparable age, size, and geographic characteristics. The
24 Company representatives in attendance at the February 19, 2009, meeting included Mr.
25 Blaine Bilderback and Mr. Dwayne Curbow, the Company’s engineer, and Aubrey
26 Water’s legal counsel. Mr. Bilderback and Mr. Curbow flew to Phoenix, Arizona, from
27 Dallas, Texas, and Kansas City, Missouri, respectively, to attend this meeting with Staff.
28 The day before the meeting, Mr. Bilderback and Mr. Curbow did a site inspection of the

1 Company's system and met with its onsite operator and consultant, Ray Jones, so they
2 could provide Staff with the most up-to-date information regarding the system.

3 At the meeting, the Company informed Staff that (1) it was aware of the February
4 28, 2009, compliance deadline to file a Revised Program, but the Company believed that
5 realistically, any Revised Program was not going to achieve the reduction in water loss to
6 10 percent as required by the Decision; (2) it had engaged Mr. Ray Jones of Aricor Water
7 Solutions as a consultant to assist in evaluating the system and to make recommendations
8 as to how the water loss problem could be further addressed, and that Mr. Jones would
9 need time to make this evaluation²; and (3) rather than file a Revised Program that would
10 have only limited value at this stage, it preferred to allow Mr. Jones to complete his
11 analysis and to file with the Commission an application to amend the Decision pursuant
12 to A.R.S. §40-252. The Company also informed Staff that because of the upcoming
13 compliance deadline, the Company would be filing on or before February 28, 2009, a
14 motion requesting an extension of time to file the Revised Program (the "Extension
15 Request") so the Company could prepare and file its A.R.S. §40-252 petition within the
16 next 90 days. Staff indicated that under the circumstances, this appeared to be a
17 reasonable course of action.

18 Based upon the meeting with Staff, on February 27, 2009, before the Revised
19 Program was due, Aubrey Water filed the Extension Request. A copy of the Extension
20 Request is attached hereto as Attachment A. Specifically, the Company sought time to
21 analyze the efficacy of its recent remedial measures, which included the hiring of
22
23

24 ² Since being contacted by the Company on February 12, 2009, Mr. Jones has done the following:

- 25 • February 18, 2009 – Site visit to Seligman with Blaine Bilderback and Dwayne Curbow to meet with John Kennedy, the Company's on-site operator and inspected system.
- 26 • March 10, 2009 – Telephone conversation with staff of Southwestern to discuss lost water issue and data requirements.
- 27 • March 11, 2009 – Submitted formal requests for information to Southwestern for data needed to assess water loss issue.
- 28 • April 8, 2009 – Telephone conversation with system operator John Kennedy to discuss current water loss efforts and to plan second site visit to conduct formal water loss evaluation of the system.
- May 12, 2009 – Completed preliminary analysis of 2008 billing data.

1 consultant Ray Jones and expressed its intent to file an A.R.S. § 40-252 application to
2 revisit the water loss requirement and methodologies.

3 On April 14, 2009, the Commission's Utilities Division ("Staff") filed a
4 Complaint and Petition for an Order to Show Cause ("OSC") because the Company had
5 not filed a Revised Program by February 28, 2009. The Company has since filed its
6 Revised Program in accordance with the Decision and is also filing this Petition pursuant
7 to A.R.S. §40-252 consistent with what the Company represented it would do in its
8 Extension Request and at its February 19, 2009, meeting with Staff.³

9 **II. THE DECISION SHOULD BE AMENDED TO ALLOW THE COMPANY**
10 **TO IMPLEMENT ITS RATE INCREASE AND TO REVISE THE WATER**
11 **LOSS CONDITION UNDER THE CHANGED CIRCUMSTANCES.**

12 **A. THE 10 PERCENT WATER LOSS CONDITION IS NOT**
13 **ATTAINABLE UNDER THE CIRCUMSTANCES AND MAY NOT BE**
14 **ECONOMICALLY FEASIBLE.**

15 Although Aubrey Water has implemented all of the recommendations from its
16 Initial Program and otherwise complied with all of the requirements of the Decision
17 (except for the 10 percent water loss), over two years have passed since the issuance of
18 the Decision, and the Company has still been unable to achieve a 10 percent or less water
19 loss for the system. Therefore, Aubrey Water has been unable to implement the
20 Commission-approved rate increase which would have provided additional revenues
21 towards addressing the problem. Notwithstanding, the Company has been, and will
22 continue to be, committed to reducing water loss on its system. To that end, Aubrey
23 Water has ordered a pump-skid system to replace the two main pumps at the wellhead to
24 address water loss from the pumps. The pumps are scheduled to be delivered and
25 installed during the second quarter of 2009. Additionally, Aubrey Water has engaged
26 Mr. Ray Jones, of Aricor Water Solutions, to provide consulting services to the
27 Company, as well as to assist the Company in addressing the water loss issue. The

28 ³ Aubrey Water opposes the OSC as unnecessary and inappropriate and believes that a better utilization of
Commission and Company resources is to resolve the issue of line losses through this A.R.S. § 40-252 Petition as
being a more constructive process.

1 Company will also continue its programs to detect leaks, replace rusted lines, replace
2 water meters, and continually inspect the system.

3 However, the Aubrey Water system is an aging system, as discussed below, in
4 need of extensive improvements projected to cost several hundred thousand dollars.
5 Even with these extensive improvements, it is not apparent that a 10 percent water loss is
6 achievable without major transmission and distribution system replacements that could
7 cost more than a million dollars. Moreover, given that the Company has only
8 approximately 280 customers, the rate shock that would be attributable to such an
9 investment would be enormous and not justified. Aubrey Water estimates that the
10 additional pumping costs attributed to its line losses above the 10 percent level increases
11 its expenses by only approximately \$4,000 per year and it has already spent over
12 \$200,000 to address the line loss issue to achieve its approximately 15 percent level in
13 2008.

14 **B. STAFF HAS RECENTLY RECOMMENDED A HIGHER LEVEL OF**
15 **ACCEPTABLE WATER LOSS FOR A MORE MODERN SYSTEM.**

16 In Docket No. WS-02987A-08-0180 for Johnson Utilities, Mr. Marlin Scott, Jr.
17 recently pre-filed direct testimony relating to Johnson Utilities' Johnson Ranch water
18 system on behalf of Staff. The Johnson Ranch water system is a recently constructed
19 modern system. In contrast, portions of the Aubrey Water system, including the
20 approximately 6.5 mile transmission main, are believed to have been constructed in 1916.
21 Much of the remainder of the system is believed to have been constructed in the 1940s,
22 1950s, and 1960s. Staff's recommendation regarding the water loss for the Johnson
23 Ranch water system is as follows:

24 The Company's Johnson Ranch water system has a water loss
25 of 19.4%.⁴ For the Johnson Ranch system, Staff recommends
26 that the Company begin a 12-month monitoring exercise of its
27 water system. Staff further recommends that the Company
28 docket the results of the system monitoring as a compliance

⁴ Johnson Utilities provided rejoinder testimony which demonstrates that the 19.4% water loss figure is substantially overstated because the numbers used to calculate the water loss did not remove water sales for construction and irrigation water. Johnson Utilities reports that the correct water loss number is only approximately 2%.

1 item in this case by November 1, 2010. If the reported loss for
2 the period October 1, 2009, through October 1, 2010, is greater
3 than 10%, the Company shall prepare a report containing a
4 detailed analysis and plan to reduce water loss to 10% or less.
5 If the Company believes it is not cost effective to reduce water
6 loss to less than 10%, it should submit a detailed cost benefit
7 analysis to support its opinion. This report shall be docketed
8 as a compliance item in this proceeding for review and
9 certification by Staff. The above report or cost benefit
10 analysis, if required, shall be docketed by December 31, 2010.
11 In no case shall water loss be greater than 15 percent. If water
12 loss is not reduced to less than 15 percent by 2010, Staff may
13 initiate an Order to Show Cause against the Company.⁵

14 Since the issuance of the Decision, Staff has revised its position to allow a 15
15 percent water loss if attaining a 10 percent water loss is not cost effective. Moreover, if
16 Staff is willing to allow up to a 15% water loss for a newer system, the argument for a
17 higher water loss allowance is even more compelling for an older rural system where
18 water loss is more common. Accordingly, there is no reason that Aubrey Water should
19 be required to obtain and maintain a 10 percent line loss level, as it is clearly not cost
20 effective for the Company to do so as discussed above. If the Commission is willing to
21 allow a 15 percent level for a more modern system, clearly the 10 percent requirement for
22 Aubrey Water is not realistic, cost effective, or attainable.

23 **C. THE DECISION SHOULD BE AMENDED TO MODIFY THE 10**
24 **PERCENT LINE LOSS REQUIREMENT AS A CONDITION OF**
25 **IMPLEMENTING THE RATE INCREASE.**

26 The Decision found that for the 2005 test year, the Company had a 43.1 percent
27 water loss rate.⁶ Based upon the program monitoring report the Company filed with the
28 Commission in January 31, 2009, Aubrey Water had an average line loss rate for 2008 of
approximately 15.15 percent.⁷ This is a remarkable improvement that demonstrates the
Company's commitment to reducing its line loss rate to a level consistent with what Staff

⁵ Direct Testimony of Marlin Scott, Jr., February 4, 2009, Executive Summary pages i and ii.

⁶ Decision at page 8, line 6.

⁷ The Company believes this percentage would be even lower had it not experienced a water line break under a street in the third quarter of 2008 that took some time to locate and repair and contributed to the line loss percentage for the year.

1 had recently recommended for a more modern system as discussed above. Accordingly,
2 the Company should be permitted to implement the rate increase, which will provide
3 much needed additional revenues that can be used to further address this issue. The
4 Company proposes that following the implementation of the rate increase, it would
5 continue to provide the Commission with semi-annual reports for an additional two years
6 so the Commission can continue to monitor the Company's water loss.

7 **III. THE COMMISSION SHOULD AMEND THE DECISION TO FIND THAT**
8 **THE COMPANY HAS SINCE COMPLIED WITH THE DECISION BY**
9 **SETTING UP AND MAINTAINING ITS BOOKS AND RECORDS IN**
10 **COMPLIANCE WITH THE NARUC USOA.**

11 The Decision required that before Aubrey Water could implement the
12 Commission-authorized rate increase, the Company must file an affidavit attesting that
13 the Company has set up and is maintaining its books and records in compliance with the
14 NARUC USOA and that following such filing, Staff would file a memorandum stating
15 that the Company has submitted a plan, acceptable to Staff regarding this requirement.⁸
16 On May 31, 2007, the Company complied with this condition by filing an affidavit signed
17 by Southwestern attesting to the fact that Aubrey Water's books and records had been set
18 up and maintained in accordance with the NARUC USOA. The Company believes that
19 since the Company complied with this condition approximately two years ago, and
20 although Staff has not filed its memorandum, the Commission should permit the
21 Company to implement the rate increase without the necessity of Staff having to file a
22 memorandum.

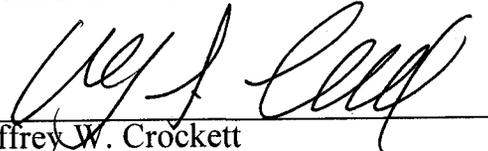
22 **IV. CONCLUSION**

23 On the basis of the foregoing, Aubrey Water requests that the Commission grant
24 its Petition and amend the Decision to modify the requirements regarding water loss and
25 to allow the Company to implement the rate increase authorized in the Decision.
26
27

28 ⁸ Decision at page 11, lines 3-7.

1 DATED this 13th day of May, 2009.

2 SNELL & WILMER L.L.P.

3
4 By 

5 Jeffrey W. Crockett
6 Bradley S. Carroll
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Attorneys for Aubrey Water Company

8 ORIGINAL and 13 copies of the foregoing
9 filed this 13th day of May, 2009, with:

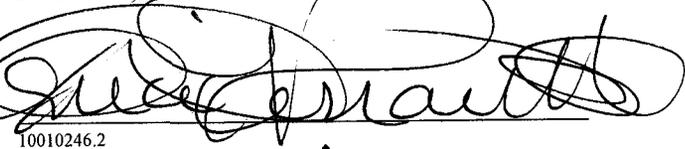
10 Docket Control
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13 COPIES of the foregoing hand-delivered
14 this 13th day of May, 2009, to:

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18 Lyn Farmer, Chief Administrative Law Judge
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Attachment A

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BEFORE THE ARIZONA CORPORATION

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COMMISSIONERS

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IN THE MATTER OF THE APPLICATION OF
THE BURLINGTON NORTHERN AND SANTA
FE RAILWAY COMPANY DBA AUBREY
WATER COMPANY FOR APPROVAL OF A
PERMANENT WATER RATE INCREASE.

DOCKET NO. W-03476A-06-0425

**MOTION FOR EXTENSION OF
TIME TO FILE REVISED WATER
LOSS ANALYSIS PROGRAM**

The Burlington Northern and Santa Fe Railway Company dba Aubrey Water Company ("Aubrey Water" or Company), through undersigned counsel, hereby requests a twelve (12) month extension of time until February 28, 2010, to file its Revised Water Loss Analysis Program with the Arizona Corporation Commission ("Commission").

I. BACKGROUND

On March 22, 2007, the Commission issued Decision No. 69379 (the "Decision") in the above-captioned matter. The Decision approved a rate increase for Aubrey Water, but stayed the implementation of the rate increase until such time as the Company completed three compliance items, including the reduction in water loss on the Company's system to 10 percent.¹ To that end, the Decision required the Company to implement a Water Loss Analysis Program ("Initial Program") and file water loss and monitoring reports each January and July demonstrating the Company's progress in implementing the Initial Program recommendations and reducing system water loss to 10 percent, as required in the Decision. If the Company did not achieve 10 percent water loss on its system by December 31, 2008, the Decision required the Company to file a Revised Water Loss Analysis Program ("Revised Program") by February 28, 2009.

¹ Aubrey Water has since met the first two compliance items which required that the Company demonstrate i) its compliance with Arizona Administrative Code, Title 18, Chapter 4; and ii) that its books and records are in compliance with the NARUC USOA, although Staff must still file a memorandum regarding the latter.

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1 On January 30, 2009, Aubrey Water filed its January 2009 Water Loss Analysis Program
2 Progress Report and 2009 Monitoring Report with the Commission ("January 2009 Reports").
3 The January 2009 Reports indicate that the Company has implemented all of the Initial Program
4 recommendations to bring the water loss to 10 percent or less within 18 months of the Decision,
5 but that the Company has still not achieved a 10 percent or less water loss for the system.
6 Accordingly, the Decision requires Aubrey Water to file a Revised Program by February 28,
7 2009.

8 On February 19, 2009, the Company met with Staff to discuss the January 2009 Reports,
9 as well as the requirement that Aubrey Water file a Revised Program by February 28, 2009. The
10 Company explained to Staff that despite its best efforts, as well as the expenditure of significant
11 money since the issuance of the Decision, the achievement of a 10 percent system loss does not
12 appear to be attainable. Accordingly, rather than filing and implementing a Revised Program,
13 the Company informed Staff that it would prefer to work with the Commission to explore other
14 options to reduce water loss to levels consistent with a system of comparable age, size and
15 geographic characteristics.

16 **II. REQUEST FOR EXTENSION OF TIME TO FILE REVISED PROGRAM**

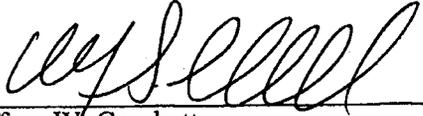
17 Although Aubrey Water has implemented all of the recommendations from its Initial
18 Program, almost two years have passed since the issuance of the Decision and the Company has
19 still been unable to achieve a 10 percent or less water loss for the system. Therefore, Aubrey
20 Water has been unable to implement the Commission-approved rate increase. Notwithstanding,
21 the Company is committed to reducing water loss on its system. To that end, Aubrey Water has
22 ordered a pump-skid system to replace the two main pumps at the wellhead to address consistent
23 water loss from the pumps. The pumps should be delivered during the first quarter of 2009.
24 Additionally, Aubrey Water has engaged Mr. Ray Jones of Aricor Water Solutions to provide
25 consulting services to the Company, as well as to assist the Company in addressing the water
26 loss issue.

27 Within the next 90 days, the Company will prepare and file with the Commission, an
28 application pursuant to A.R.S. §40-252, to revisit the compliance water loss requirements of the

1 Decision in light the Company's experience dealing with this issue over the past two years, as
2 well as to include Mr. Jones' findings and recommendations regarding the system. The
3 Company believes that an A.R.S. §40-252 process will take approximately 9 to 12 months which
4 may ultimately render the necessity of filing a Revised Program moot if the Decision is
5 amended. The Company, therefore, requests a 12-month extension of time to file a Revised
6 Program until February 28, 2010.

7 DATED this 27th day of February, 2009.

8 SNELL & WILMER L.L.P.

9
10 By 

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16 Attorneys for Aubrey Water Company

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21 1200 West Washington Street
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23 Copies of the foregoing delivered
24 this 27th day of February, 2009, to:

25 Ernest Johnson, Director
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