KEYES&FOX LLP

July 3, 2025

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Mr. Adam Teitzman
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 20250011-EI – In re: Petition by Florida Power & Light Company for Base Rate Increase

Dear Mr. Teitzman,

Please find attached for filing the Updated Direct Testimony of R. Thomas Beach on behalf of EVgo Services, LLC. Thank you for your assistance with this matter. Please feel free to contact me with any questions regarding this filing.

Respectfully submitted,

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Attachments
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company	)	Docket No. 20250011-EI
	)	
	)	Submitted for filing: July 3, 2025

UPDATED DIRECT TESTIMONY OF

R. THOMAS BEACH

ON BEHALF OF EVGO SERVICES, LLC

JULY 3, 2025

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I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. Please state your name, title and business address.

A. My name is R. Thomas Beach. I am principal consultant of the consulting firm Crossborder Energy. My business address is 2560 Ninth Street, Suite 213A, Berkeley, California 94710.

Q. Have you prepared a statement of your experience and qualifications?

A. Yes. My qualifications are described in the attached *curriculum vitae* (CV), which is included as Exhibit RTB-1 to this testimony. As documented in my CV, I have more than 40 years of experience on rate design and ratemaking issues for natural gas and electric utilities. I began my career in 1981 on the staff at the California Public Utility Commission (CPUC), working on the implementation of the Public Utilities Regulatory Policies Act of 1978 (PURPA). Since leaving the CPUC in 1989, I have had a private consulting practice on energy issues and have appeared, testified, or submitted testimony, studies, or reports on numerous occasions before state regulatory commissions in many states. My CV includes a list of the formal testimony that I have sponsored in state regulatory proceedings concerning electric and gas utilities. With respect to issues concerning commercial electric vehicle (EV) charging, I have testified on the design of commercial EV rates in Arizona, California, Massachusetts, New Jersey, and Texas.

Q. Have you previously testified before this Commission?

A. No, I have not.

Q. On whose behalf are you testifying in this proceeding?

A. I am appearing on behalf of EVgo Services, LLC (EVgo). EVgo is one of the nation's leading public fast charging providers. With more than 1,100 fast charging stations across

more than 40 states, EVgo strategically deploys localized and accessible charging infrastructure by partnering with leading businesses across the U.S., including retailers, grocery stores, restaurants, shopping centers, gas stations, rideshare operators, and autonomous vehicle companies. At its dedicated Innovation Lab, EVgo performs extensive interoperability testing and has ongoing technical collaborations with leading automakers and industry partners to advance the EV charging industry and deliver a seamless charging experience.

Under its owner-operator business model, EVgo develops, finances, owns, and operates its fast-charging network. EVgo works with site host partners across the country to deploy EV charging solutions at retail locations that are already part of customers' daily routines. EVgo installs the public direct current fast chargers (DCFC) at no cost to the site host partner. EVgo also maintains the customer relationship with the EV driver, providing a call center that is available to customers 24/7, and is responsible for operations and maintenance of its EV charging network.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide the Commission, the utility, and stakeholders with the unique perspective of an established owner-operator of EV charging infrastructure, with experience in more than 40 states including Florida, to ensure the Florida Power and Light's (FPL or "the Company")'s EV charging rates will achieve their desired policy objectives. My testimony addresses the following issues:

- FPL's rate riders for DCFC customers—the Electric Vehicle Charging Infrastructure Riders (GSD-1EV and GSLD-1EV).

- The price that FPL charges EV drivers at its utility-owned public fast-charging stations— the Utility-Owned Public Charging for Electric Vehicles Pilot (UEV).

Q. Please summarize your recommendations to the Commission in this proceeding.

A. On behalf of EVgo, my testimony recommends that the Commission:

- Direct FPL to modify the GSD-1EV and GSLD-1EV riders as detailed herein, to provide for a more graduated phase-in of demand charges for DCFC stations with load factors below 15%, using a rate design now employed by other utilities such as National Grid.
- Direct FPL to set pricing at its utility-owned chargers that is aligned with both (1) FPL's costs for these chargers, in order to fully recover FPL's costs and avoid subsidization by other ratepayers; and (2) current market pricing for fast-chargers in FPL's service territory.
    - Specifically, EVgo recommends that the UEV tariff price be set at $0.50 per kWh, not including applicable taxes and fees, which is aligned with the current market for EV fast-charging service in Florida and with the utility's stated costs to provide service at company-owned fast-charging stations.

Q. Do you sponsor any exhibits to your testimony?

A. Yes. I sponsor the following exhibits to my testimony:

- Exhibit RTB-1 – CV of R. Thomas Beach
- Exhibit RTB-2 – Selected Discovery Responses from FPL

II. BACKGROUND

Q. How can the electric rate design applicable to commercial EV charging station customers affect the deployment of such stations?

A. Electricity makes up a substantial portion of ongoing costs for EV charging stations, so the way electric rates are designed impacts the economic case for installing new infrastructure. Public DCFC infrastructure has a unique load profile that makes it distinct from other commercial customers. The demand charge component of traditional commercial rates can lead to disproportionately high effective dollar per kilowatt-hour (kWh) costs to operate DCFC, which creates a significant barrier to third-party investment in charging infrastructure.[1] Well-designed commercial EV rates that account for the unique loads of fast charging stations at this early stage of EV adoption is essential to achieve transportation electrification at scale.

Q. Please explain further the demand charge barrier.

A. Most electric utilities in the U.S. design their standard commercial electric rates with monthly demand charges that cover all or most of a utility's distribution costs. These demand charges are assessed based on the customer's maximum demand in any 15-, 30-, or 60-minute period each month. While a DCFC station may draw power at, or close to, its nameplate demand capacity at some point during each month, this level of power will not be sustained throughout the month. Further, the total monthly energy use at certain DCFC stations may be low during the early months of operation. This means EV fast-

[1] *See* EVgo, "The Costs of EV Fast Charging Infrastructure and Economic Benefits to Rapid Scale Up," Jonathan Levy, et al., (May 18, 2020), https://site-assets.evgo.com/f/78437/x/f28386ed92/2020-05-18_evgowhitepaper_dcfc-cost-and-policy.pdf at 11.

charging stations are likely to have lower load factors than typical commercial customers.[2]

Because station operators may be unable to spread the significant demand charges in standard commercial rates over large volumes of usage, demand charges result in high effective dollar per kWh costs for these customers. Even as load factors grow over time, the load factors of DCFC stations will continue to be lower than typical commercial customers—in part because operators will seek to avoid queuing at their stations which can degrade an EV driver's charging experience. In short, commercial rates with high monthly demand charges impact the economics of deploying and operating fast-charging infrastructure and present a barrier to development.

FPL clearly recognized this issue in its 2020 petition seeking approval of its Schedules GSD-1EV and GSLD-1EV pilot tariffs:

> FPL states that the current rate design poses a challenge to the economics of the public fast charging stations that experience a high demand and low levels of kWh energy sales, or utilization. At low levels of utilization, the electric bills incurred by the charging stations result in demand charges being spread over a relatively low volume of energy sales. This is referred to as a low load factor customer. Charging stations with higher kWh sales, i.e., high load factor customers are able to spread the billed demand cost over more energy sales and are, therefore, more likely to recover their costs.
>
> FPL asserts that the demand charge included in standard demand rate schedules creates a barrier to entry during the early years of the EV market.[3]

[2] The load factor is the ratio of the customer's average hourly usage over the billing period to its peak hourly usage based on the interval in which the customer's billed demand for the month is determined.

[3] *See* Docket No. 20200170-EI, Order No. PSC-2020-0512-TRF-EI (the 2020 CEV Order) at 6-7.

III. ELECTRIC VEHICLE CHARGING INFRASTRUCTURE RIDERS

Q. Please describe the Company's Electric Vehicle Charging Infrastructure Riders.

A. FPL's EV Charging Infrastructure riders (GSD-1EV and GSLD-1EV) were designed as an initial step to address the demand charge barrier, by setting an upper limit on a DCFC customer's maximum monthly demand that is used to determine the customer's monthly demand charge. This upper limit on the billed demand is calculated by dividing a customer's monthly energy usage by 75 hours. If the customer's actual maximum demand is higher than this upper limit, the upper limit is used for billing purposes. It is my understanding that the 75 hours were selected in order to prevent the customer's billed demand from going above the demand that is equivalent to about a 10% load factor in any month.[4] In other words, a DCFC customer with a load factor below 10% is billed a lower demand charge, calculated as though the station's load factor was exactly 10%. This places a floor on the DCFC customer's exposure to very high average costs for electricity at its low-load factor stations.

Q. What does the Company propose with regard to the pilot riders in this proceeding?

A. FPL proposes to make the current Schedule GSD-1EV and GSDLP-1EV riders permanent.

Q. What is your position on this proposal?

A. I believe that the rider has been helpful as a simple first step to reduce the demand charge barrier, and I appreciate FPL's initiative in proposing the pilot rider. However, as explained below, FPL should follow best practices from other utilities across the country that have successfully employed alternative rate structures for DCFC customers that have

[4] The math is (75 hours per month) x (12 months per year) / (8,760 hours per year) = 10.3%.

been effective in promoting EV adoption, supporting infrastructure investment, and realizing ratepayer benefits. Since 2020, only 76 locations have enrolled in FPL's riders despite the utility's large service territory which includes 231 fast-charging locations (excluding the FPL-owned charging stations).[5] As of March 2025, the riders currently benefited 40 locations,[6] or 17% of the non-FPL fast-charging locations in FPL's service territory. An improved permanent DCFC rate design would incentivize greater participation in areas with promising but unestablished demand, and thus promote the further build-out of the state's DCFC infrastructure.

Q. Please discuss your recommendation for a permanent DCFC rate design.

A. I commend FPL for their early leadership in establishing the pilot riders; however, since the Company proposed the riders, other utilities have demonstrated different rate structures that have been effective in recognizing the unique load of DCFCs and supporting further deployment. Thus, I recommend that the Schedule GSD-1EV and GSDLP-1EV riders be modified to use a rate structure similar to one implemented in the U.S. Northeast by the utility National Grid. National Grid has a DCFC rate structure with a series of discounts on the demand charge that are directly linked to the DCFC customer's load factor (see Table 1 below).[7] Below a 5% load factor, the rate is all-volumetric. For load factors between 5% and 10%, the demand charge is discounted by 75%. At load factors from 10% to 15%, the demand charge discount is 50%. The demand charge discounts are offset by correspondingly higher volumetric rates for distribution

[5] EVgo generated this by filtering the AFDC list of unrestricted DC fast chargers (accessed on June 4, 2025 at https://afdc.energy.gov/stations#/analyze?country=US&region=US-FL&fuel=ELEC&ev_levels=dc_fast&tab=location) to exclude FPL-owned sites and used a GIS software to retain only those located within FPL's service territory.

[6] Response to EVgo's First Set of Interrogatories, Interrogatory No. 6, included in Exhibit RTB-2.

[7] *See* https://www.nationalgridus.com/MA-Business/Rates/Service-Rates.

service. There is no reduction in the demand charge above a 15% load factor.[8] This structure provides stability in the average rate paid by the DCFC customer as its loads and load factors improve over time. The all-volumetric rate for stations with load factors below 5% is more supportive for new stations during their initial period of low usage, compared to the 10% demand limiter structure in FPL's pilot riders.

Table 1

Tier	Load Factor	Demand Charge Discount*	Estimated GSD-1 Energy Charge Adjustment ($/kWh)
1	0 - 5%	100%	$0.03786
2	5 - 10%	75%	$0.02839
3	10 - 15%	50%	$0.01893
4	> 15%	0%	$0

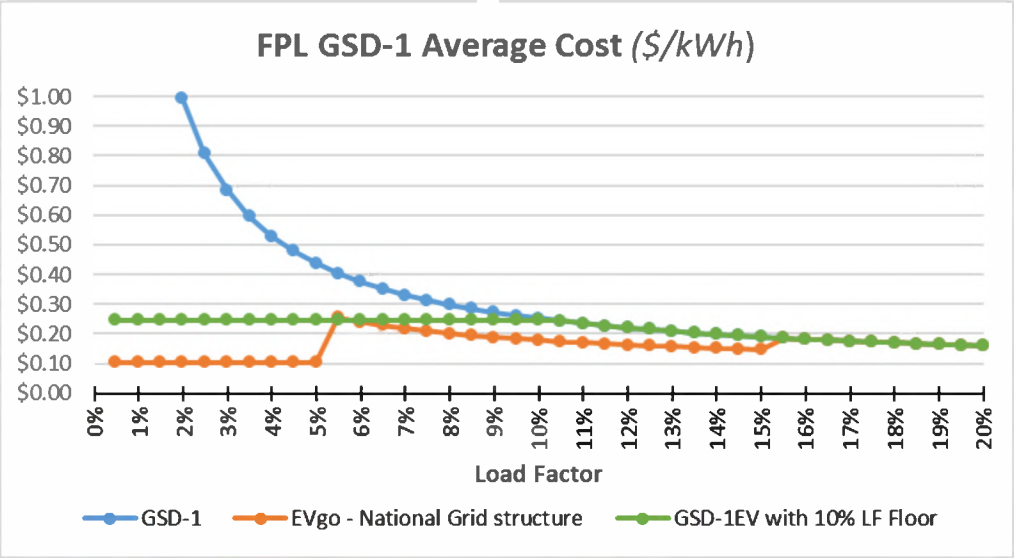
* The demand charge discount at each tier will be offset by the appropriate energy charge adjustment shown in the final column.

Q. Please compare your proposed DCFC rate structure to FPL's current pilot riders.

A. Figure 1 shows the average cost as a function of a station's load factor, for (1) the standard GSD-1 rate (blue line), (2) the current pilot GSD-1EV rider (green line), and (3) EVgo's proposed rate using the National Grid rate structure (orange line).

[8] For a full description of the National Grid rate, see Massachusetts Department of Public Utilities, Docket D.P.U. 21-91, National Grid, *Direct Testimony of Demand Charge Alternative Panel*, Exhibit NG-DCA-1 at https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13758109.

Figure 1



Q. Why is this modification in the public interest?

A. As illustrated in Figure 1, EVgo's recommended structure provides more support for stations with the lowest load factors, below 5%. It also provides modestly more support for stations with load factors in the 5% to 15% range, compared to the existing pilot rider structure. DCFC customers would pay the standard GSD-1 rate for load factors above 15%. This enhancement in the support for low-load-factor stations is in the public interest due to the continuing need to expand EV infrastructure in Florida to support the strong growth of the EV market in the state. All low-load-factor stations will benefit from this change, not just EVgo's. This proposal follows the practices of other utilities – National Grid, Arizona Public Service,[9] Madison Gas & Electric,[10] Dominion Energy in

[9] *See* Rate Rider DCFC, https://www.aps.com/-/media/APS/APSCOM-PDFs/Utility/Regulatory-and-Legal/Regulatory-Plan-Details-Tariffs/Business/Rate-Riders/dcfc_DirectCurrentFastCharging.pdf.

[10] *See* Sheet E-9.1 of https://www.mge.com/MGE/media/MGE-Library/documents/rates-electric/electric-rates-20241227.pdf.

Virginia,[11] and Public Service of Colorado[12] – that also offer commercial rates with reduced demand charges to commercial EV customers with low load factors, typically below 15%.

Q. Will providing this rate structure benefit FPL ratepayers?

A. Yes. Any revenues lost due to the reduction in the average rate paid by low-load-factor stations will be offset by load growth, and load growth will drive down rates for all ratepayers over time. As discussed by EVgo witness Beaton, a 2024 study by Synapse Energy Economics found that EVs contribute significantly more in utility revenues than costs, leading to downward pressure on rates across the country.[13] In Florida in particular, Synapse found that the revenues from EV adoption exceeded costs by $55.6 million between 2011 and 2021.[14] FPL found this to be the case with its existing EV riders as well, stating "[w]hile FPL shows demand-related revenue loss [of $204,000] in these early years, there is also $2.3 million in revenues collected from customers through these tariffs that may not have otherwise materialized."[15] I calculate that modifying the EV riders as EVgo recommends would have resulted in an increase of $49,000 in 2024 in the demand-related revenue loss, from $204,000 to $253,000. However, based on FPL's experience to date, the incremental revenues will continue to far exceed the reduced

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[11] *See* the GS-2 rate, with a waiver of demand charges for customers with monthly loads of less than 200 kWh per kW, https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/business-rates/schedule-gs2.pdf.

[12] *See* the Public Service of Colorado low load-factor rate, at Sheet 44 of its electric rate book, https://xcelnew.my.salesforce.com/sfc/p/1U0000011ttV/a/8b000002Y8xL/kYe61yf.9xyigvh2701Az49XLgU2izDS8ShGaCXiwsQ.

[13] Synapse Energy Economics, *Electric Vehicles Are Driving Rates Down for All Customers* (January 2024), https://www.synapse-energy.com/sites/default/files/Electric%20Vehicles%20Are%20Driving%20Rates%20Down%20for%20All%20Customer%20Update%20Jan%202024%2021-032.pdf at 3.

[14] Synapse Energy Economics, *EVs Are Driving Rates Down for All Customers: State-by-State Cumulative EV Net Rate Impact Summary* (June 2024), https://www.synapse-energy.com/sites/default/files/EV%20All%20State%20List%20PDF_0.pdf.

[15] 2024 CEV Report at 12 (Table 6).

demand charges.[16] This will support greater DCFC deployment which will lead to more incremental loads, and new revenues, for FPL, as well as downward pressure on rates for FPL's ratepayers. Furthermore, a robust public charging network is essential to support the even larger incremental revenues that FPL will receive from home and workplace charging of EVs.

IV. UTILITY-OWNED PUBLIC FAST-CHARGING PRICING

Q. Please describe the Company's UEV tariff.

A. Under this tariff, FPL has installed over 321 utility-owned fast charging ports in workplaces, tourist destinations, and other public spaces throughout its service territory. The utility now charges EV drivers $0.30 per kWh to charge at these facilities. This rate was set in 2020, in the 2020 CEV Order. The decision found that this rate was "market-based" at that time, and was reasonable in the absence of cost data for this new utility program:

> FPL asserts that one of the goals of its petition is to learn more about EV driver needs and gather more specific usage and cost data to allow FPL to develop cost-based rates for EV charging services. The proposed UEV tariff is not cost-based, but based on a "market-rate." Fast charging rates vary by provider, by location, and the level of charging offered. We find FPL's calculation of the proposed UEV rate to be appropriate for the limited purpose of this pilot and that traditional cost-of-service based rates cannot be accurately calculated at this early stage of utility-involvement in the EV market. We find that FPL's proposed market-based rate is reasonable in the limited context of approving pilot tariffs with the specific goal to collect cost and usage data for utility-owned fast charging stations.[17]

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[16] This calculation is based on FPL's reported $204,000 revenue loss under the existing rider, scaled up by the additional discount from EVgo's proposed CEV rate structure, as shown in Figure 1 by the difference between the gray and orange lines at load factors below 15%.

[17] *See* 2020 CEV Order at 5.

Q. What has the Company proposed with regard to the UEV tariff?

A. The Company proposes to raise its pricing from $0.30 per kWh to $0.35 per kWh, asserting that such a rate "is market-based and comparable to the EV pricing options offered by non-utility providers."[18]

Q. How does FPL's proposed pricing compare to the pricing of other DCFC operators?

A. While I appreciate the Company's initiative in proposing to increase its pricing, FPL's proposed price is still well below the current market rate for EV fast charging in Florida. Based on data from a third-party survey of fast-charging prices in the state, the average current price is $0.48 per kWh, as of February 7, 2025.[19] This price is conservative (i.e. low) as a measure of the competitive market price, given that it appears to include FPL's utility-owned stations that offer the current below-market price of $0.30 per kWh. FPL owns about 20% of the fast-charging locations in its service territory.[20] In other words, a survey of market prices that excludes FPL's utility-owned stations would likely result in an even higher price.

Q. Is cost data now available on FPL's utility-owned fast-charging stations?

A. Yes. The 2024 EV Report shows that the 2024 costs for FPL's public fast-charging program were $0.51 per kWh.[21] Notably, FPL's revenues from fast charging were $0.30 per kWh, so other ratepayers subsidized FPL's fast-charging stations in 2024 by $0.21 per kWh, or $2.387 million.[22] This subsidy is more than ten times the reduced demand

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[18] *See* Docket 20240025-EI, *Direct Testimony of Tim Oliver* at 36.

[19] *See* Stable Auto's survey of Level 3 fast-charging prices in Florida, https://stable.auto/insights/electric-vehicle-charger-price-by-state (last updated Feb. 7, 2025).

[20] Based on the AFDC data discussed in Footnote 5, above.

[21] *See* 2024 CEV Report, at Attachment 1, page 1. This attachment shows a 2024 revenue requirement of $5.741 million to supply 11.162 million kWh at the Company-owned fast-charging stations.

[22] *Id.* FPL's fast-charging revenues in 2024 were $3.354 million. The 2024 revenue requirement of $5.741 million less revenues of $3.354 million yields a subsidy of $2.387 million in 2024.

charge revenues in 2024 due to the demand limiter in the GSD-1EV and GSDLP-1EV riders.[23]

Q. Why is it important for the Commission to consider the utility's cost in setting the rate for the UEV tariff?

A. There are several reasons the Commission should consider the utility's cost in determining the UEV tariff.

First, as I explained previously, the Commission stated "[w]e find FPL's calculation of the proposed UEV rate to be appropriate for the **limited purpose of this pilot** and that traditional cost-of-service based rates cannot be accurately calculated at this early stage of utility-involvement in the EV market."[24] The Commission clearly intended that market-based pricing be allowed for the pilot only, and implied that once cost data is available, it should be used to determine pricing moving forward.

Second, as I explained previously, the general body of ratepayers are currently subsidizing a portion of the costs of utility-owned charging stations. In 2024, this amounted to $2.387 million. Setting the UEV tariff in a way that ensures that it will recover the utility's costs will relieve this burden on ratepayers.

Finally, considering the utility's costs in determining the UEV tariff will create a more even playing field, thus driving private investment in EV charging in the Company's territory. Private sector DCFC providers must charge prices that reflect the full cost stack of DCFC which includes not only electricity, but also maintenance, a customer call center, and other development and operations costs. If utilities are able to charge a lower price because they can recover a portion of their EV-related costs, such as

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[23] *Id.* at Table 6, showing the "demand limiter offset" of $204,390 in 2024.
[24] *See* 2020 CEV Order at 5.

development, financing, and operations costs, from non-EV customers, the Commission risks creating an uneven playing field that may discourage future private investment in EV infrastructure. Further, it may undermine existing private investments, as EV drivers may be more likely to charge at utility stations with below-market prices that are subsidized by ratepayers.

Q. What do you recommend with regard to the UEV tariff?

A. I recommend that the Commission direct FPL to set pricing at its utility-owned chargers that is aligned with both (1) FPL's costs for these chargers, in order to fully recover FPL's costs and avoid subsidization by other ratepayers; and (2) current market pricing for fast-chargers in FPL's service territory, in order to avoid distorting the EV charging market.

Specifically, I recommend the UEV tariff be set at $0.50 per kWh, not including applicable taxes and fees. This pricing balances the conservative market survey price of $0.48 per kWh and FPL's 2024 fast-charging costs of $0.51 per kWh. If FPL disagrees with this price, we suggest they do their own survey of market prices, subject to stakeholder input, in line with best practice.

Q. Have other Commissions sought to ensure that the pricing of utility-owned fast-charging was in line with market pricing?

A. Yes, Xcel Energy in Colorado provides one example. The issue of pricing for utility-owned DCFC stations went through a fully litigated process before the Colorado Public Service Commission in 2021 and 2022 in Proceeding No. 21AL-0494E. Similar to FPL, the utility proposed to charge EV drivers below market pricing at its utility-owned DCFC

stations.[25] In the end, the Colorado Commission considered two distinct proposals from parties for pricing at Xcel's utility-owned DCFC stations. The first was presented in a settlement between Xcel Energy and PUC Staff ("Settlement Agreement").[26] The second was presented by parties as a Stipulation ("First Stipulation") and consisted of higher pricing to align with the average DCFC pricing in the competitive market in order to avoid discouraging private investment in the state.[27] The Colorado Commission ultimately adopted the pricing from the First Stipulation, concluding that the alternative "rates in the Settlement Agreement risk undercutting competition and causing a decline, or at least limiting the growth, in the deployment of DCFC stations by commercial EV charging companies."[28] The Colorado Commission also provided general direction regarding pricing at utility owned stations and supported pricing that is in line with the private market, stating, "[i]n adopting rates at this stage, we remain mindful that the risk of utility-owned stations charging below-market rates could hamper the further development of private charging stations in these areas that are critical to enhance consumer confidence that EV charging is readily available."[29]

V. SUMMARY OF RECOMMENDATIONS

Q. Please summarize your recommendations to the Commission.

A. I recommend that the Commission:

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[25] Colorado Public Utilities Commission, Proceeding No. 21AL-0494E. Xcel Energy's original proposal would have put the blended rates at $0.17 per kWh and $0.34 per kWh depending on whether the station was rural or urban.

[26] Proceeding No. 21AL-0494E, Decision No. R22-0378 at ¶ 95.

[27] *Id.* at ¶ 96.

[28] Proceeding No. 21AL-0494E, Decision No. C22-0485 at ¶ 26.

[29] *Id.*

- Direct FPL to modify the GSD-1EV and GSLD-1EV riders as detailed herein, to provide for a more graduated phase-in of demand charges for DCFC stations with load factors below 15%, using a rate design now employed by other utilities such as National Grid.
- Direct FPL to set pricing at its utility-owned chargers that is aligned with both (1) FPL's costs for these chargers, in order to fully recover FPL's costs and avoid subsidization by other ratepayers; and (2) current market pricing for fast-chargers in FPL's service territory, in order to avoid distorting the EV charging market.
    - Specifically, EVgo recommends that the UEV tariff price be set at $0.50 per kWh, not including applicable taxes and fees, which is aligned with the current market for EV fast-charging service in Florida and with the utility's stated costs to provide service at company-owned fast-charging stations.

Q. Does this conclude your direct testimony?

A. Yes, it does.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been furnished by electronic mail this 3rd day of July 2025 to the following:

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