

FILED

JUN 28 2021

**MISS. PUBLIC SERVICE
COMMISSION**

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSISSIPPI**

MISSISSIPPI PUBLIC SERVICE COMMISSION

DOCKET NO. 2021-AD-52

**IN RE: ORDER ESTABLISHING DOCKET TO INVESTIGATE THE
MEMBERSHIP OF ENTERGY MISSISSIPPI, LLC IN THE
MIDCONTINENT INDEPENDENT TRANSMISSION OPERATOR**

**MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.'S RESPONSES TO
COMMISSION'S REQUESTS IN ORDER ESTABLISHING DOCKET**

COMES NOW the Midcontinent Independent System Operator, Inc. ("MISO") and submits its comments and responses to the requests made by the Mississippi Public Service Commission ("Commission") beginning with Paragraph 5 through Paragraph 10 in its *Order Establishing Docket* filed in the above captioned proceeding on April 6, 2021, as follows:

1. MISO is an independent, not-for-profit regional transmission organization ("RTO") that delivers safe, cost-effective electric power across 15 U.S. States and the Canadian province of Manitoba. MISO is committed to the reliable, non-discriminatory operation of the bulk power transmission system and collaborating with all stakeholders to create cost-effective and innovative solutions for the changing industry.

2. On April 6, 2021, the Commission entered an Order Establishing a Docket to Investigate the Membership of Entergy Mississippi, LLC ("Entergy Mississippi") in the Midcontinent Independent Transmission Operator. In that order, the Commission invited MISO to become a party to this proceeding and to submit testimony or comments on the issues raised therein.

3. MISO appreciates the opportunity to submit the comments and information herein. As the Commission is aware, Entergy Mississippi's membership in MISO has resulted in significant cost savings and other related benefits. From 2014 to 2018, Entergy Mississippi and the Commission reported significant savings associated with Entergy Mississippi's membership in MISO and its participation in MISO's centralized wholesale electricity markets.¹

4. On July 2, 2018, the Commission considered Entergy Mississippi's continued membership in MISO and determined that Entergy Mississippi's continued membership in MISO would deliver significant benefits to Mississippi rate payers.²

5. The following information provides an overview of MISO, its markets and services and MISO's value proposition:

¹ *Entergy Utility Customers Realize Significant Benefits After 5 Years as MISO Member*, Entergy Newsroom, <https://www.entergynewsroom.com/news/entergy-utility-customers-realize-significant-benefits-after-5-years-as-miso-member/> (Dec. 16, 2019).

² Mississippi Public Service Commission Docket No. 2017-UA-189.

Value Creation for Mississippi Members and Ratepayers: Through participation in MISO, Entergy Mississippi is part of a large pool of generating facilities stretching across the large footprint of MISO. The benefits provided by MISO membership of enhanced reliability and more efficient use of the region's existing transmission and generation assets allow Entergy Mississippi to maintain reliability while passing the resulting savings along to customers. Ultimately, the delivered cost of energy and long-term benefits for customers have yielded significant savings over the years of Entergy Mississippi's membership in MISO. Prior press releases from Entergy discuss the results of Entergy Mississippi's cost/benefit analysis, which show these customer savings calculated by Entergy from their first 5 years of membership in MISO. These press releases can be found at: <https://www.entergynewsroom.com/news/entergy-utility-customers-realize-significant-benefits-after-5-years-as-miso-member/>.

North America's Largest RTO / ISO: MISO is the primary RTO/ISO in the central portion of the North American continent spanning from the Gulf of Mexico in the South to Canada's Hudson Bay in the North, then, from the Great Lakes and Appalachian foothills in the East to the open prairies West of the Mississippi River. This footprint represents a diverse operating network with diversity in energy policy, structure of state and local governments, and interpretation of federal laws and implementation of regulations by individual stakeholders. MISO and its leadership engage with various stakeholders across the footprint in order to reconcile diverging styles into a unified approach to bulk electric grid operations.

World Class Energy Market: MISO's leadership is responsible for overseeing one of the world's largest energy market platforms for matching the supply and demand of energy. Providing independent, equal, and non-discriminatory access to the electric transmission system is a core function of MISO, as the largest RTO by geographic footprint. Since 2005, MISO has provided financially binding day-ahead and real-time pricing of energy. MISO Markets include a Financial Transmission Rights Market, a Day-Ahead Market and a market for operating reserves and regulation. Overall, MISO managed more than \$22 billion in transactions in 2020 on behalf of 471 Market Participants who serve approximately 42 million people.

Outstanding Operations: MISO's efficient market operations ensure and support increased grid reliability. MISO operators are responsible for the supervision of more than 65,800 miles of transmission lines and nearly 7,000 generating units with a market Generation Capacity of 184,287 MW and a reliability Generation Capacity of 198,933 MW. This requires coordination with 128 Non-Transmission Owners, 58 Transmission Owners and 38 Local Balancing Authorities.

MISO operators efficiently and reliably operate the bulk electric grid through optimized transmission utilization, allowing market transparency, eliminating pancaked transmission rates, and centralizing unit commitment and dispatch. MISO engineers plan and coordinate with peer organizations and members to ensure seamless operations across MISO's footprint as well as the rest of the North American continent. This includes the outage coordination team who ensures that the right generators and transmission lines are online at the right time.

Stakeholder Engagement and Customer Service: Thought diversity and collaboration are essential to MISO as the most reliable, value-creating RTO. To enable broad stakeholder participation, MISO hosts meetings in all three of its locations and provides dial in and WebEx access. A stakeholder can be a Member, Market Participant, government or regulatory official, or anyone who is interested in learning more about MISO.

The formal stakeholder process requires a dedicated team of professionals focused solely on engaging with a variety of stakeholders in a meaningful way. All of MISO's business units are involved in the stakeholder process and the relationships among MISO stakeholders are key to the decision-making process. MISO prioritizes consistent engagement with these groups to encourage constructive dialogue. The dialogue is with a full understanding and sensitivity to diverging views, positions, and arguments in an effort to provide an opportunity for continuous improvement for all stakeholders throughout the MISO territory and footprint. Many topics have been discussed and developed through a collective stakeholder process and many voices of stakeholders have been heard that have made meaningful and impactful changes during the process. The MISO South retail regulators have provided impactful feedback during stakeholder discussions that has helped MISO craft numerous initiatives, such as TMEP modifications to generation nodes³, the elimination of the Market Efficiency Project ("MEP") postage stamp concept in the cost allocation structure⁴, the cost allocation modifications and cooperation with respect to the certain transmission projects⁵, cooperation for withdrawal of certain transmission projects concerning benefit examination⁶, as well as sensitivity to projects and the seams and the benefits thereof.

These relationships go far beyond the MISO-facilitated stakeholder meetings. MISO leadership and employees participate in industry events to engage with regulators, entrepreneurs, academics, and other thought-leaders in order to enhance MISO's strategic vision. This level of engagement requires precise coordination.

Value Proposition: With growing energy demands throughout MISO's footprint, MISO's services help ensure reliable, least-cost delivered energy. MISO's Value Proposition documents how MISO unlocks billions in annual benefits for the region. In 2020, those efforts provided between \$3.1 billion and \$3.9 billion in regional benefits, driven by enhanced reliability, more efficient use of the region's existing transmission and generation assets, and a reduced need for new assets.⁷ MISO's Value Proposition affirms MISO's core belief that a collective, region-wide approach to grid planning and management delivers the greatest benefits. MISO's landmark

³ *Reevaluating TMEP Regional Cost Allocation Methodology*, MISO, <https://cdn.misoenergy.org/20180419%20RECBWG%20Item%2003%20TMEP%20Reevaluation176834.pdf> (Apr. 19, 2018).

⁴ *Review of Postage Stamp Cost Allocation*, MISO, <https://cdn.misoenergy.org/20170216%20RECBWG%20Item%2007%20Postage%20Stamp%20Review90253.pdf> (Feb. 16, 2017).

⁵ FERC Docket No. ER18-364-000.

⁶ *Waterford – Churchill 230kV Economic Project Withdrawal*, MISO, <https://cdn.misoenergy.org/20201009%20STSTF%20Waterford%20-%20Churchill%20230kV%20Economic%20Project%20Withdrawal482098.pdf> (Oct. 9, 2020).

⁷ *MISO Value Proposition 2020: Detailed Calculation Description*, MISO, <https://cdn.misoenergy.org/2020%20MISO%20Value%20Proposition%20Calculation%20Details521882.pdf>.

analysis serves as a model for other grid operators and transparently communicates the benefits in MISO's operations.

MISO works every day to create value for its members. The value MISO adds became apparent shortly after the energy-only market began in 2005. To quantify this value, MISO – in collaboration with its stakeholders – created the MISO Value Proposition in 2007. The Value Proposition breaks MISO's business model into recognized categories of benefits and calculates a range of dollar values for each defined category. From 2007 through 2020, the Value Proposition studies revealed that MISO provided the region an estimated \$30 billion in cumulative net benefits.⁸

Proven, Experienced Leadership: The MISO Operating Committee consists of the organization's twelve senior leaders. They are responsible for serving stakeholders – ranging from Market Participants, to government regulators, to household energy consumers. To do so effectively, MISO's leadership team retains deep expertise in their respective business units but also remains conversant in other aspects of MISO's operations. The dedication of the executive team to continuous strategic planning ensures that MISO delivers on its cornerstones of Customer Service, Effective Communication, and Operational Excellence.

MISO's leadership represents more than 255 years of combined experience. While most of this experience is concentrated within the energy industry, the Operating Committee represents a diverse team of seasoned leaders within the RTO/ISO field and their own specific areas of focus. MISO Operating Committee members serve the energy industry in a multitude of ways while representing the needs and interests of our employees and stakeholders. This service involves countless hours of travel in order to have personal interaction with as many stakeholders as possible. Through fostering leadership within MISO, the Operating Committee ensures effective management of the organization as well as stewardship of the region's electric transmission system.

6. MISO provides the following additional comments on docket items not addressed in the above statements.

⁸ *Id.*

REQUEST NO.: 5.a.

MISO's evolving transmission planning and cost allocation methodologies; including, but not limited, to MISO's assumptions about future generation resource portfolios and assumed increased demand tied to the electrification.

RESPONSE:

See below ☒

See attached ☐

RESPONSE DATE:

June 28, 2021

MISO's Response to the Reliability Imperative focuses on preparing the region for industry transformation as the grid evolves toward the retirement of legacy resources and the increased deployment of renewable resources. As a critical part of this effort, Long Range Transmission Planning ("LRTP") holistically considers the needs of the MISO footprint and identifies transmission that will be needed to maintain system reliability. The LRTP approach is not new to MISO. LRTP was established more than 10 years ago as a forward-looking process that considers the needs and opportunities for grid expansion and is more commonly referred to by MISO as value-based planning. LRTP employs a seven-step process that starts with the creation of the future scenarios and ends with the recommendation of a specific project for the MISO Transmission Expansion Plan ("MTEP") Appendix A, along with an associated cost allocation mechanism for the recommended project. Step 1 of the LRTP process – Futures Development – was recently completed after an 18-month collaboration between MISO and stakeholders on the broad range of projected scenarios for the industry. Going forward, MISO will iterate with stakeholders on recommended solutions to ensure the system is planned to be reliable, resilient, and efficient in the near-term as well as the distant future. Recommended solutions resulting from the LRTP process will be included in future MTEP cycles as they are identified, vetted with stakeholders, and have demonstrated the projects meet established criteria.

In further support of the above response, MISO respectfully directs the Commission to the information contained in the links below:

1. MISO's Long-Range Transmission Planning:
<https://www.misoenergy.org/planning/transmission-planning/long-range-transmission-planning/>
2. MISO's Futures Report:
<https://cdn.misoenergy.org/MISO%20Futures%20Report538224.pdf>
3. MISO's Futures Development:
<https://www.misoenergy.org/planning/transmission-planning/futures-development/>
4. MISO's Renewable Integration Impact Assessment Report:
<https://cdn.misoenergy.org/RIIA%20Summary%20Report520051.pdf>
5. MISO's Reliability Imperative:
<https://www.misoenergy.org/about/miso-strategy-and-value-proposition/miso-reliability-imperative/>

REQUEST NO.: 5.b.

Potential changes to generator accreditation, transition to a seasonable capacity auction, implementation of novel untested market design changes including Available Capacity (ACAP), raising the administratively determined Value of Lost Load (VOLL) to \$10,000/MWh (particularly in light of the excessive prices of natural gas and electricity observed during the February 2021 Polar Vortex.), MISO's application of VOLL to certain de-energized load busses during force majeure events (e.g., hurricanes) resulting in unreasonably high "uplift costs" and MISO's proposal to revise the recovery of those uplift costs so that they are paid only by the subregion of MISO affected by the force majeure event, and other repercussions that may result from MISO's Resource Adequacy and Need (RAN) initiative.

RESPONSE:

See below ☒

See attached ☐

RESPONSE DATE:

June 28, 2021

As MISO prepares the region for a future with a different risk profile driven by high renewable penetration and increasingly-frequent extreme weather events, alignment of Resource Adequacy Requirements with reliability risk is critical. MISO has engaged with stakeholders discussing Resource Availability and Need ("RAN") for several years. Key focus areas for 2020 and 2021 have been communicated at numerous forums, including the Markets Committee of the Board of Directors, the Resource Adequacy Sub-Committee, the Market Subcommittee, and the Organization of MISO States. Resource Adequacy changes are being driven by defining system reliability needs and capabilities, as discussed in MISO's August 2020 paper Changing Reliability Requirements for an Evolving Fleet. MISO is continuing to discuss the appropriate Resource Adequacy construct for the region taking into account increases in renewable resource penetration, extreme weather events and maximum generation emergencies in recent years. To address these issues, MISO has discussed with stakeholders a transition from an annual capacity auction to seasonal capacity auctions and related revisions to resource accreditation rules necessary to ensure resources are available when needed. While certain details of MISO's Resource Availability and Need construct are still being discussed with stakeholders, MISO expects to file changes to its Tariff to incorporate a more holistic RAN solution in the second half of 2021.

Another key focus area in MISO's Response to the Reliability Imperative has been to improve emergency and scarcity pricing, ensuring market prices better reflect underlying system conditions. MISO recently received approval from FERC on its 2020 emergency pricing filing (ER21-700-001) and completed its evaluation of scarcity pricing. MISO set its current Value of Lost Load ("VOLL") to \$3,500/MW over 10 years ago and completed a review of alternative methodologies for updating the value. The Independent Market Monitor has recommended updating VOLL to a higher value, including reconfiguring the Operating Reserve Demand Curve for several years. The Scarcity Pricing initiative has been a MISO, IMM, and stakeholder priority and has adjusted scope in response to Hurricane Laura, the February Arctic event and associated concerns voiced by stakeholders regarding the events' market outcomes. As a result, MISO has prioritized issues related to the use of VOLL pricing during capacity and transmission emergencies, the application of VOLL to de-energized nodes, also known as dead busses, and the allocation of uplift associated with de-rated transmission capacity, including de-rates and

emergencies caused by force majeure events. Discussions of these issues, solutions and timelines continue at MISO's stakeholder forums.

MISO's continued work on price formation and resource adequacy align with MISO's Market Vision Guiding Principle of supporting Market Participants in making efficient operational and investment decisions. Through continued enhancements to pricing and resource adequacy requirements, MISO seeks to better incentivize Market Participants, including vertically integrated utilities, to make efficient operational and investment decisions in both the short- and long-run. Short-run market efficiency generally involves resources operating according to their marginal cost. In the case of vertically integrated utilities, prices that accurately reflect system conditions provide a signal on when to utilize their own resources and when to make market purchases when more economic. In the long-run, market price signals and resource adequacy requirements incentivize optimal investments in upgrading, maintaining and building new capacity. As a result, vertically integrated utilities benefit from efficient market pricing through providing a mechanism to optimally utilize their resources.

REQUEST NO.: 5.c.

The categories and relative magnitude of benefits and costs associated with RTO membership, including:

- i. Wide area economic commitment and generation resource dispatch;
- ii. Effects on the quality and cost of required capacity reserves;
- iii. Effects on the quantity and cost of operating reserves;
- iv. The value of transmission planning functions performed by MISO;
- v. Effects on local electric system reliability;
- vi. Effects of MISO Interconnection Queue project application management.

RESPONSE:

See below ☒

See attached ☐

RESPONSE DATE:

June 28, 2021

For information regarding the benefits and costs associated with RTO membership, including the value drivers of improved reliability, more efficient use of existing assets, and reduced need for additional assets, please refer to the Value Proposition page of the MISO website which can be found at the following link: <https://www.misoenergy.org/about/miso-strategy-and-value-proposition/miso-value-proposition/>

MISO manages the Generator Interconnection Queue process for all of the MISO footprint by administering Attachment X – Generator Interconnection Procedure – of the MISO Tariff. These Tariff provisions outline the non-discriminatory manner in which MISO studies requests to connect to the MISO transmission system; including the MISO transmission system in Mississippi owned by Entergy Mississippi and Cooperative Energy. There have been fifty-one projects submitted for connection to the MISO transmission system in Mississippi over the last five years representing 8,496MW. Fourteen of those projects are still under study and represent 2,091 MW in the queue. Eleven projects have been studied and are now under a Generator Interconnection Agreement representing approximately 956MW. This information is publicly available on the MISO website at the following link: https://www.misoenergy.org/planning/generator-interconnection/GI_Queue/gi-interactive-queue/.

Along with managing the Tariff requirements associated with queue administration, MISO also manages the NERC compliance associated with FAC-002-2 Facility Interconnection Studies.

REQUEST NO.: 6

The Commission seeks comments regarding whether Entergy Mississippi and its customers would enjoy greater net benefits and be exposed to less risk in an alternative operational environment, including, but not limited to, joining the newly formed Southeast Energy Exchange Market (SEEM).

RESPONSE: See below ☒
RESPONSE DATE: June 28, 2021

See attached ☐

Please see the following MISO comments to FERC regarding the Southeast Energy Exchange Market which can be found at the following link: [FINAL MISO SEEM Filing Comments531875.pdf \(misoenergy.org\)](#)

REQUEST NO.: 7.

The Commission seeks comments regarding factors that may limit Entergy Mississippi's access to benefits from continued membership in MISO, including:

- a. The effects of limited transmission capacity (physical and contractual) between MISO South and the rest of the MISO system;
- b. The effects of existing and future planning and cost allocation procedures on potential transmission investments to expand interregional transmission capability, including accounting for economic impacts of local generation investment.

RESPONSE:

See below ☒

See attached ☐

RESPONSE DATE:

June 28, 2021

7a.)

MISO continues to evaluate opportunities to cost-effectively increase the transfer capability in the MISO system. As part of the Market Congestion Planning Study completed in 2020, MISO included a focus area evaluating transmission projects to increase the transfer capability between MISO Midwest and South. While several transmission projects were evaluated the study concluded without recommending a transmission project for approval by the MISO Board of Directors. A summary of the study is available at the following link: <https://cdn.misoenergy.org/20200527%20MCPS%20TSTF%20Item%2003%20North-South%20Interface448455.pdf>

As part of the Long-Range Transmission Planning process MISO will continue to evaluate cost-effectively increasing the transfer capability between the MISO Midwest and South.

7b.)

In 2020, MISO completed the most recent iteration of the MISO-SPP Coordinated System Plan Study. This study did not result in approved MISO-SPP interregional transmission projects. The final 2020 study report is available at the following link: <https://cdn.misoenergy.org/20210326%20MISO%20SPP%20IPSAC%202020%20SPP-MISO%20CSP%20Report530782.pdf>

MISO and SPP plan to begin discussions in late 2021 on a potential interregional process to identify interregional transmission projects focused on addressing chronic areas of congestion resulting in market-to-market settlements. Additional information responsive to this request can be found at the following link:

https://www.misostates.org/images/stories/meetings/Seams_Liaison_Committee/2021/RSC_Final_Recommendations_for_SLC.pdf

The limitation on the transmission capacity between MISO South and the rest of the MISO system is largely contractual but yet subjective as to physical transfer limitation. With MISO membership, Entergy Mississippi has access to benefits provided by the sharing of all transmission capacity, including the physical and contractual capacity, within MISO South and between MISO South and the rest of the MISO System. These include, but are not limited to: (1) Access to

purchase lower cost economic energy imports of up to 3,000 MW from MISO North and Central, as well as from other resources in MISO South, without procuring additional Transmission Service; (2) Access to sell economic energy exports of up to 2,500 MW to MISO North and Central, as well as to execute market or bilateral sales in MISO South, without procuring additional Transmission Service; (3) Access to procure capacity from bilaterally from Resources in MISO South or MISO North and Central, or making purchases of Zonal Resource Credits in the Planning Resource Auction without procuring additional transmission service; and (4) Significantly reduced cost of Operating and Contingency Reserves which are shared across the MISO footprint, and associated compliance costs.

REQUEST NO.: 8.

The Commission seeks comments regarding any factors limiting benefits to Entergy Mississippi whether and to what extent additional transmission investments would be required for Entergy Mississippi to participate in alternative regional pooling arrangements, such as SEEM.

RESPONSE:

See below ☒

See attached ☐

RESPONSE DATE:

June 28, 2021

MISO's Tariff and the Transmission Owner Agreement ("TOA") provide a process for exiting membership in MISO which includes a calculation regarding the cost of exiting the system. The MISO Transmission Owners Agreement can be found at the following link: https://docs.misoenergy.org/legalcontent/Rate_Schedule_01_-_Transmission_Owners_Agreement.pdf

REQUEST NO.: 9.

MISO's evolving transmission planning and cost allocation methodologies; including, but not limited, to MISO's assumptions about future generation resource portfolios and assumed increased demand tied to the electrification.

RESPONSE:

See below ☒

See attached ☐

RESPONSE DATE:

June 28, 2021

MISO does not have any comments regarding this item at this time.

REQUEST NO.: 10.

The Commission seeks comments from Entergy Mississippi, MISO, other MISO members, other RTOs (e.g., Southwest Power Pool), the utilities involved in developing SEEM, and any other interested stakeholder.

RESPONSE:

See below ☒

See attached ☐

RESPONSE DATE:

June 28, 2021

For MISO comments regarding the Southeast Energy Exchange Market ("SEEM"), please see the comments on docket item #6.

Respectfully submitted, this 28th day of June 2021.

Midcontinent Independent System Operator, Inc.

By: Butler Snow LLP


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CERTIFICATE OF SERVICE

I, Meade W. Mitchell, counsel for Midcontinent Independent System Operator, Inc. do hereby certify that in compliance with Rule 6.121(2) of the Commission's Public Utilities Rules of Practice and Procedure:

(1) An electronic copy of the filing has been filed with the Commission via e-mail to the following address: efile.psc@psc.state.ms.us

(2) An electronic copy of the filing has been served via e-mail to the following:

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- (3) A copy of the filing has been served via U. S. Mail, to the following:

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This the 28th day of June 2021.



Meade W. Mitchell