106337

AN ORDINANCE relating to the Seattle City Light Department; establishing an Emergency Low Income Assistance Program and amending Seattle Municipal Code Chapter 21.49.

Law Department

Energy 12/17/85

DO PASS as amended

ORDINANCE No. 112637

Law Department

COUNCIL BILL No. 105241

RECD OMB DEC 24 1985

Energy
DO PA

COMPTROLLER FILE No.

Introduced: NOV 25 1985	By: Rice EXECUTIVE REQUEST
Referred: NOV 25 1985	To: Energy
Referred:	To:
Referred:	To:
Reported: DEC 23 1985	Second Reading: DEC 23 1985
Third Reading: DEC 23 1985	Signed: DEC 23 1985
Presented to Mayor: DEC 24 1985	Approved: DEC 30 1985
Returned to City Clerk: DEC 30 1985	Published:
Vetoed by Mayor:	Veto Published:
Passed over Veto:	Veto Sustained:

ORDINANCE 112637

AN ORDINANCE relating to the Seattle City Light Department; establishing an Emergency Low Income Assistance Program and amending Seattle Municipal Code Chapter 24.49.

WHEREAS, Ordinance 111615 adopted on April 10, 1984 set the rates, terms and conditions for use and sale of electricity; and

WHEREAS, the Revenue Requirement Analysis prepared for the 1984 rate increase indicated that total revenues from energy sales to customers in 1985 would have to equal $225.6 million if the Department were to meet its financial targets of 2.0 debt service coverage, 50 percent debt financing of regular Capital Improvement Program, and 80 percent confidence of positive net earnings; and

WHEREAS, because of lower estimates of purchase power costs from BPA, lower production costs at the Centralia Steam Plant, higher system load and lower rates of inflation, the Department now projects that less than $225.6 million in revenues from sales of energy is needed to assure positive net earnings, 2.0 debt service coverage, and 50 percent financing of its Capital Improvement Program; and

WHEREAS, the Department projects a revised customer revenue requirement of $218.6 million needed to meet 2.0 debt service coverage and to provide a needed hedge against financial uncertainties in 1985; and

WHEREAS, Ordinance 112441, effective November 1, 1985 authorizes a temporary rate reduction in the amount of $7.0 million; and

WHEREAS, the Mayor and City Council, in addition, have recommended the establishment of a special account within the Light Fund in the amount of $4.5 million from 1985 earnings, to be invested and the proceeds of that investment to be used to provide emergency, low income assistance to certain customers; NOW THEREFORE

BE IT ORDAINED BY THE CITY OF SEATTLE AS FOLLOWS:

Section 1. Seattle Municipal Code 21.49.040 (Section 21.49.040 of Ordinance 112441) is to be followed by a new section to read as follows:

Section 21.49.042 EMERGENCY LOW INCOME ASSISTANCE PROGRAM

A. An emergency credit of 50 percent of a customer's delinquent bills up to a maximum credit of $200 may be granted

by the Department to residential account holders who qualify under the following criteria:

1. meet the income eligibility guidelines for assistance under the Federal Energy Crisis Intervention Program; and

2. have received a 24-hour notice from the Department notifying them that payment or payment arrangements must be made to prevent disconnection; and

3. have applied for and received grants from both the Federal Energy Assistance Program and the Federal Energy Crisis Intervention Program during their current program year or funds available through these programs must have been exhausted for the current program year; and

4. have entered into an agreement with the Department to pay a minimum of [illegible] percent of the delinquent amount and also make arrangements to pay any remaining delinquent balance. The emergency credit from this program may be applied to the required payment of the minimum of 20 percent of the delinquent amount.

B. A customer is eligible for the emergency credit only one time in each [illegible] period.

C. This program shall be [illegible] following the termination of [illegible] Energy Assistance Program or the [illegible] Intervention Program.

by the Department to residential account holders who qualify under the following criteria:

1. meet the income eligibility guidelines for assistance under the Federal Energy Crisis Intervention Program; and

2. have received a 24-hour notice from the Department notifying them that payment or payment arrangements must be made to prevent disconnection; and

3. have applied for and received grants from both the Federal Energy Assistance Program and the Federal Energy Crisis Intervention Program during their current program year or funds available through these programs must have been exhausted for the current program year; and

4. have entered into an agreement with the Department to pay a minimum of 50 percent of the delinquent amount and also make arrangements to pay any remaining delinquent balance. The emergency credit from this program may be applied to the required payment of the minimum of 50 percent of the delinquent amount.

B. A customer is eligible for the emergency credit only one time in each twelve-month period.

C. This program shall terminate 30 days following the termination of either the Federal Energy Assistance Program or the Federal Crisis Intervention Program.

Section 2. **This ordinance shall take effect and be in force thirty days from and after its passage and approval, if approved by the Mayor; otherwise it shall take effect at the time it shall become a law under the provisions of the city charter.**

Passed by the City Council the 23rd **day of** December, 1985,

and signed by me in open session in authentication of its passage this 23rd **day of** December, 1985.

President of the City Council.

Approved by me this 30th **day of** December, 1985.

Acting Mayor.

Filed by me this 30th **day of** December, 1985.

Attest:

City Comptroller and City Clerk.

(SEAL)

Published

By Theresa Dunbar

Deputy Clerk.

C68 0.1.0

STATE OF WASHINGTON)
COUNTY OF KING) SS
THE CITY OF SEATTLE)

I, Tim Hill, Comptroller and City Clerk of The City of Seattle, do hereby certify that the within and foregoing is a true and correct copy of an original instrument as the same appears on file and of record in this document.

IN WITNESS WHEREOF I hereunto set my hand and affix the seal of The City of Seattle, this 23rd day of December, 1985.

TIM HILL
Comptroller and City Clerk

By: Theresa Dunbar
Deputy Clerk

CS 19.2

ORDINANCE _____

AN ORDINANCE relating to the Seattle City Light Department; establishing an Emergency Low Income Assistance Program and amending Seattle Municipal Code Chapter 21.49.

WHEREAS, Ordinance 111615 adopted on April 10, 1984 set the rates, terms and conditions for use and sale of electricity; and

WHEREAS, the Revenue Requirement Analysis prepared for the 1984 rate increase indicated that total revenues from energy sales to customers in 1985 would have to equal $225.6 million if the Department were to meet its financial targets of 2.0 debt service coverage, 50 percent debt financing of regular Capital Improvement Program, and 80 percent confidence of positive net earnings; and

WHEREAS, because of lower estimates of purchase power costs from BPA, lower production costs at the Centralia Steam Plant, higher system loan and lower rates of inflation, the Department now projects that less than $225.6 million in revenues from sales of energy is needed to assure positive net earnings, [illegible] debt service coverage, and 50 percent financing of its Capital Improvement Program; and

WHEREAS, the Department projects a revised customer revenue requirement of $218.[illegible] million needed to meet 2.0 debt service coverage and to provide a needed hedge against financial uncertainties in 1985; and

WHEREAS, Ordinance 112441, effective November 1, 1985 authorizes a temporary rate reduction in the amount of $7.0 million; and

WHEREAS, the Mayor and City Council, in addition, have recommended the establishment of a special account within the Light Fund in the amount of $4.3 million from 1985 earnings, to be invested and the proceeds of that investment to be used to provide emergency, low income assistance to certain customers; NOW THEREFORE

BE IT ORDAINED BY THE CITY OF SEATTLE AS FOLLOWS:

Section 1. Seattle Municipal Code 21.49.040 (Section 21.49.040 of Ordinance 112441) is to be followed by a new section to read as follows effective January 1, 1985:

<u>Section 21.49.042 EMERGENCY LOW INCOME ASSISTANCE PROGRAM</u>

A. <u>An emergency credit of 50 percent of a customer's delinquent bills up to a maximum credit of $200 may be granted</u>

by the Department to residential account holders who meet the following criteria:

1. have a maximum monthly income of not more than 125 percent of the federal poverty level after excluding 20 percent of earned income; and

2. head a household whose membership consists of at least one dependent child living on the premise and under the age of 18; and

3. have received a 24-hour notice from the Department notifying them that payment or payment arrangements must be made to prevent disconnection; and

4. have applied for and received grants from both the Federal Energy Assistance Program and the Federal Energy Crisis Intervention Program during the period of time when funds are available from those programs or funds available through these programs must have been exhausted for the current program year; and

5. have entered into an agreement with the Department to pay a minimum of 50 percent of the delinquent amount and also make arrangements to pay any remaining delinquent balance.

B. A customer is eligible for the emergency credit only one time in each twelve-month period.

City of Seattle

Executive Department-Office of Management and Budget
Gary Zarker, Director
Charles Royer, Mayor

7847

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COPY RECEIVED

NOV 19 1985

Douglas N. Jewett
CITY ATTORNEY

NOV 15 1985

November 14, 1985

The Honorable Douglas Jewett
City Attorney
City of Seattle

Dear Mr. Jewett:

The Mayor is proposing to the City Council that the enclosed legislation be adopted.

REQUESTING DEPARTMENT: Seattle City Light

SUBJECT: An ordinance relating to the Seattle City Light Department; establishing an Emergency Low Income Assistance Program and amending Seattle Municipal Code Chapter 24.49.

Pursuant to the City Council's S.O.P. 100-014, the Executive Department is forwarding this request for legislation directly to your office for review and drafting.

After reviewing this request and drafting appropriate legislation:

(X) File the legislation with the City Clerk for formal introduction to the City Council as an Executive Request.

( ) Do not file with City Council but return the proposed legislation to OMB for our review. Return to _____.

Sincerely,

Charles Royer
Mayor

By

GARY ZARKER
Budget Director

GZ/gh/ca

Enclosure

cc: Superintendent, Seattle City Light

Your
Seattle
City Light

Randall W. Hardy, Superintendent
Charles Royer, Mayor

November 12, 1985

REC'D OMB NOV 14 1985

930759

Via the Mayor's Office
Attention Office of Management and Budget

The Honorable Norman B. Rice
President, Seattle City Council

Dear Councilmember Rice:

Emergency Low-Income Assistance Program Ordinance

I am pleased to transmit to your attention a proposed amendment to the rate ordinance establishing an Emergency Low-Income Assistance Program. You have already received the report on which the proposed Ordinance is based (copy attached). The program will provide for the establishment of a special account within the Light Fund in the amount of $4.3 million from 1985 earnings. This amount is to be invested and the proceeds of the investment to be used to provide emergency, low-income assistance to certain City Light customers. Eligibility guidelines are outlined in the Ordinance.

I am requesting that the Ordinance be referred to the Energy Committee for consideration during their first committee meeting in December. Thank you for your assistance in this matter.

Yours truly,

Randall W. Hardy
Superintendent

SW:bp

Enclosures

cc: Mayor Charles Royer
Councilmember Michael Hildt, Chair, Energy Committee
Gary Zarker, Office of Management and Budget
Joe Garcia, Department of Human Resources

Attachment A

Low Income Assistance Program

I. Overview Of The Low Income Endowment Account

This proposal is intended to provide emergency financial assistance to low-income families whose electrical service has been disconnected or is in imminent danger of being disconnected. The proposal consists of two parts:

a. the creation of a permanent fund with an endowment of $4,300,000; and

b. the establishment of a program, financed from interest earnings on the fund, to make pledges for a portion of the outstanding electric bills of low-income families whose electrical service has been disconnected or is imminent danger of being disconnected.

II. Need for a Low-Income Emergency Assistance Program

There are at present a number of programs and organizations that provide energy assistance to low-income households. These efforts include the following:

- the Federal Energy Assistance Program (EAP);
- the Federal Energy Crisis Intervention Program (ECIP);
- the State-mandated Winter Utility Moratorium Program;
- the City Light Credit Liaison Program;
- Project Share;
- the City Light Average Payment Plan; and

the hard work and financial contributions of such non-profit organizations as:

- St. Vincent de Paul;
- Operation Blessing;
- the Salvation Army;
- the Caring Ministry;
- the Seattle Milk Fund;

- P-I Action; and

- others.

Despite the existence of these programs and organizations, many low-income households still face termination of their electrical service because they cannot afford to pay their electric bills. Although some low-income households are able to use EAP or ECIP funds to pay their winter electric bills, these funds are usually exhausted by the spring. At this time of year in particular, many low-income households turn to local non-profit organizations and to Project Share for assistance. Due to the limited resources of both Project Share and local non-profit organizations, only a portion of the low-income households that need assistance can actually be offered financial support. From the period of January 1, 1985 to September 6, 1985, Project Share contributions could only be made to 328 households out of 1,018 households that were referred to the Department of Human Resources (DHR) through the Credit Liaison Program. Total pledges from Project Share and other sources through the first nine months of this year amount to $39,018 in comparison to a total of $281,912 in delinquent bills referred to the Credit Liaison Program. In 1984, Project Share contributions could only be made to 210 households out of 1,342 households that were referred to DHR through the Credit Liaison Program. Total pledges from Project Share and other sources in 1984 amounted to about $55,000 in comparison to a total of about $270,000 in delinquent bills referred to the Program.

Because the need for financial assistance is so much greater than the resources of Project Share, assistance has been limited to low-income, high risk households, that is, households with elderly, handicapped, or infants, and not even all of these households can be given a pledge toward their electric bill. The situation is similar with respect to the non-profit organizations mentioned above. These organizations, which receive more than a hundred phone calls each week from people who have received disconnection notices, have limited resources and must turn away many households who come for help. St. Vincent de Paul, which contributed $3,115 through the Credit Liaison last year, received 1900 requests for energy assistance through the first six months of this year, with the average delinquent bill totaling about $200. During the same period, the Capital Hill office of the Salvation Army received requests from 1100 households for outstanding electric bills that the Salvation Army could not make any pledge toward.

III. Relation of the Proposed Program to Project Share

In view of this situation, the Co-Chairpersons of the City Light Credit Liaison Advisory Committee recommended to the Mayor and City Council that a trust fund be established to provide ongoing financial assistance to low-income households through Project Share. (The Citizens' Rate Advisory Committee and the Study Group have also recommended that money be set aside to assist low-income households in paying their electric bills, though not specifically through Project

Share). According to the Law Department, a contribution from the Light Fund to Project Share would be illegal given the flexible rules that currently guide the commitment of pledges through Project Share. State law governing utilities requires:

a. that assistance provided to low-income ratepayers be offered in accordance with uniform eligibility criteria; and

b. that all who are eligible under such criteria be given assistance.

In contrast to these requirements, the Project Share program is designed to meet a variety of individualized circumstances. Indeed, the flexibility that Project Share has in responding to the diverse situations facing low-income households is one of its main advantages. In so far as Project Share's flexibility is maintained, however, it would conflict with the uniformity requirements of State law that must be met if financial support were provided through the Light Fund.

In order to retain Project Share's flexibility, it is recommended that a separate new program, which conforms to the legal requirements noted above, be established. This program would complement Project Share by assisting one group of low-income ratepayers facing service termination, i.e., low-income families, thereby reducing the pressure on Project Share (as well as on non-profit organizations) and allowing Project Share to assist a smaller group of low-income households in a more flexible manner.

IV. The Low-Income Emergency Assistance Fund

The coincidence of City Light's larger than expected net income for 1985, which makes possible a temporary reduction in electric rates, and the large number of low-income ratepayers facing service termination this winter, makes this a particularly good time to establish a permanent fund for the purpose of providing emergency assistance to low-income families. Establishment of this permanent fund in 1985 will reduce the amount of cash in the utility's construction fund, and thus increase future borrowing and interest expense but have no effect on the utility's net earnings or on its debt service coverage for 1985. Based on assumptions described in section VII below, it is proposed that a fund in the amount of $4,300,000 be established and that the interest earnings from this fund be used to provide ongoing financial support for the emergency assistance program described below.

V. An Emergency Assistance Program for Low-Income Families Facing Disconnection of Electrical Service

a. Eligibility Criteria

In order to receive emergency assistance under the proposed program, a household must meet all of the following criteria:

1. Low-Income Household with Children - the household must have income not greater than 125% of the federal poverty level and include a household member under the age of 18;

2. Termination Status - the household must have received a 24 hour disconnection notice from City Light;

3. Other Assistance Status (a) - the household must have exhausted its Energy Assistance Program (EAP) and Energy Crisis Intervention Program (ECIP) money, or the local funds available for these two federal programs must have run out for the remainder of the fiscal year; and

4. Other Assistance Status (b) - the pledge from this program (in combination with other sources, e.g., pledges from non-profit organizations, the customer's own money, etc.) must be sufficient to restore service (if already disconnected) or maintain service (if not disconnected).

Each of these eligibility criteria is discussed below.

In order to receive emergency assistance under the proposed program, a household must have income not greater than 125% of the federal poverty level and include a household member under the age of 18. Although there are other groups of low-income ratepayers who require emergency assistance, low-income elderly and low-income disabled in particular, statistics from both the Credit Liaison Program and the Energy Cirsis Intervention Program (ECIP) indicate that low-income families are the largest group facing service disconnection. Moreover, by providing assistance to low-income families under this program, Project Share and local non-profit organizations will be in a better financial position to assist other low-income households facing service termination. The income guideline of 125% of the federal poverty level is recommended because it is consistent with the income guidelines for the Energy Assistance Program (EAP) and the Energy Crisis Intervention Program (ECIP).

Certification of eligibility under the criteria described above can be accomplished for 85% of the eligible applicants as a result of their participation in either of the federal energy assistance programs (EAP and ECIP) or by virtue of their participation in the Aid to Familiew with Dependent Children (AFDC) program. Statistics from the U.S. Census and from the Washington State Department of Social and Health Service (DSHS) indicate that approximately 73% of households with children at or below 125% of poverty in the local service area receive benefits through the AFDC program. Participation in the AFDC program, in turn, can be verified by presentation of a DSHS verification card, or a DSHS Medical Coupon (current month), or by a check of the DSHS public assistance roster (published, and available on microfiche, in February and November). Of the remaining 27% of eligible

households, DHR estimates that at least half, or 13.5% of the total, receive assistance through EAP or ECIP, which require documentation that income not exceed 125% of the federal poverty level. Together, then, participation in either AFDC, EAP, or ECIP can be used to certify more than 85% of all eligible households. For a small portion of households, eligibility would be determined by self declaration, which is the method of certification used for Project Share and for Rate Schedule #26, the special rate for low-income elderly and disabled. (It should be noted that the Project Share application includes a sworn affidavit, which notes, in capital letters, that the maximum fine for perjury is $500).

Once City Light has sent out a 24 hour notice of disconnection, it typically takes three days before the customer's power is actually disconnected. This period should provide adequate time for the customer to notify the utility of his or her inability to pay the outstanding bill. Once such notification is made, a 14 day hold can be placed on the customer's account. Verification that a household has received a 24 hour notice of disconnection can be made by presentation of the notice or by a check of City Light's computerized billing records.

Requiring that an eligible household have exhausted its Energy Assistance Program (EAP) and Energy Crisis Intervention Program (ECIP) money ensures that available federal money is used before assistance is provided under this program. Verification of this requirement can be accomplished by a check of City Light records if an EAP or ECIP pledge has been made to the utility, or by a check of DHR records (DHR contracts with local agencies to provide assistance through EAP and ECIP).

Finally, requiring that the pledge from this program (in combination with other money) be sufficient to restore or maintain service ensures that the pledge from this program will, in fact, result in continued electrical service. This is also a condition for receiving assistance under the federal Energy Crisis Intervention Program (ECIP) and from Project Share. Under current City Light policy, a customer's service may be restored (if disconnected) or maintained (if not disconnected) provided that the customer pays half the amount of the outstanding bill, makes arrangements to pay the remaining half of the outstanding bill, and keeps up with current bills. This requirement can be verified directly by City Light if the pledge from this program in combination with the applicant's own money is sufficient to pay the outstanding bill, or if the pledge form this program in combination with the applicant's own money is sufficient to pay at least half the outstanding bill and the applicant agrees to a schedule of payment for the remainder of the outstanding bill. If an applicant requires pledges from other sources in order to make a payment sufficient to restore or maintain electric service, then DHR would verify the required pledge commitments through the Credit Liaison Program as it currently does.

b. Assistance Amount

This program will pay 50% of an eligible customer's outstanding bill up to a maximum of $200 (which is the same formula used in providing assistance through Project Share). A customer may receive assistance under this program only once during a twelve month period.

Paying only 50% of an eligible customer's outstanding bill means that the customer continues to have responsibility for paying the remaining portion of his or her bill, though in dire circumstances the customer may have to seek additional help from other programs and organizations. (It is assumed that customers receiving assistance from this program would not be eligible for Project Share assistance, though exceptions might be made in extreme situations). Based on the 1,018 delinquent bills referred to the Credit Liaison Program this year, a pledge of 50% of the outstanding bill up to $200 would allow service to be maintained for 82% of the customers referred to the Credit Liaison Program. The remaining 18%, with very large outstanding electric bills, would have to secure additional money even to pay the 50% of their bill required by City Light in order to maintain service.

VI. Program Administration

This program would be administered by City Light and the Department of Human Resources with the division of responsibilities between the two departments being similar to the current division of responsibilities in the administration of the Credit Liaison Program. More specifically, City Light would handle applications from households which did not require additional pledges (from other sources) in order to restore or maintain electrical service. The Department of Human Resources would handle more complicated cases, referred by City Light and other agencies, where additional pledges or credit counseling is necessary.

VII. Program Cost

The estimated number of participating households, estimated annual cost, and the required size of the permanent endowment are shown in the table below.

Estimated Program Costs

Eligible Group	# of Households	Annual Cost	Endowment Required
Households with children under 18 at or below 125% of poverty	3,250[a]	$386,750[b]	$4,300,000[c]

NOTES: [a]3,250 assumes a 25% participation rate among the 13,700 households with children at or below 125% of poverty in the

City Light service area. The assumption of a 25% participation rate is based on DHR and DSHS statistics which show that 25% of all local AFDC recipients participate in the Energy Crisis Intervention Program (ECIP).

[b]$386,750 is equal to the number of households assisted, i.e., 3,250, times an average pledge of $119. The figure of $119 is the average pledge that would result if the assistance formula, i.e., 50% of the outstanding bill up to a maximum of $200, were applied to the actual delinquent bills of the 328 customers that received pledges through Project Share from 1/1/85 through 9/6/85.

[c]$4,300,000 is the amount of endowment required in order to generate $386,750 in annual interest earnings assuming an interest rate of 9%. The Treasurer's Cash Investment Account, dated July 31, 1985, shows a yield on total investment securities of 9.245%.

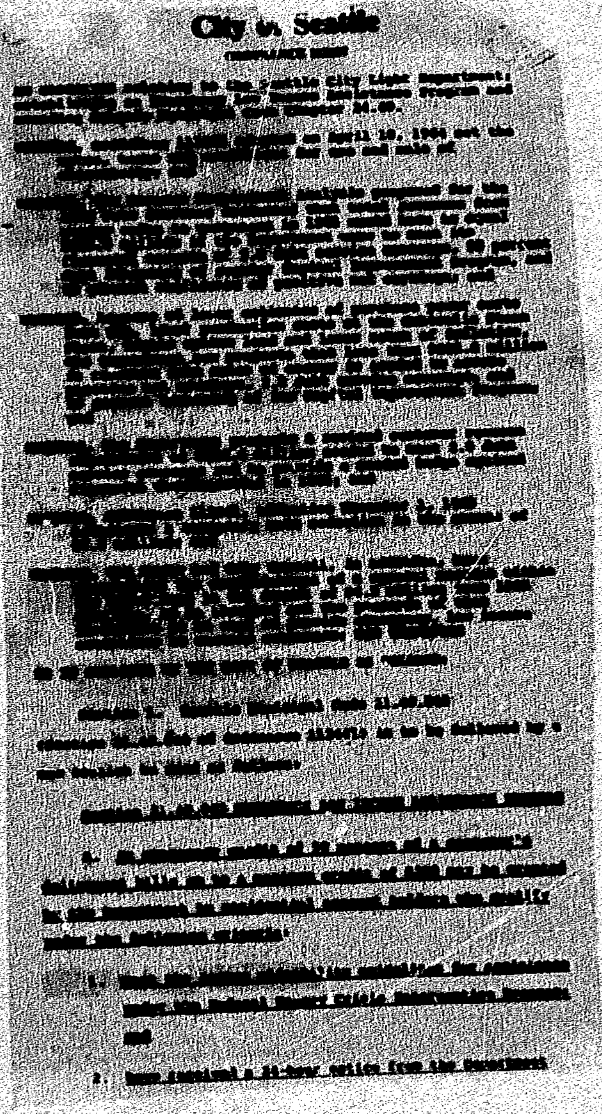
These estimates incorporate a measure of conservatism. For example, a 25% participation rate for all low-income households with children is somewhat high because the 25% participation rate of AFDC households in ECIP is probably higher than the participation rate among non-AFDC households in ECIP. This is due to the fact that the Washington State Department of Social and Health Services (DSHS) has gone to considerable lengths to ensure that AFDC households receive the benefits of ECIP. It is also important to bear in mind that households would only be eligible for the proposed emergency assistance program after they had exhausted their EAP and ECIP money or EAP/ECIP funds have been exhausted for the year. Low-income households are eligible for both of these programs (a household must have received a disconnection notice in order to receive ECIP assistance).

For purposes of being financially conservative, no attempt has been made to calculate the impact of a reduction in City Light's uncollectable accounts resulting from this program. Currently, uncollectable accounts total over $2 million. Having $386,000 available for assistance to low-income families facing disconnection should, over a number of years, have a positive effect on uncollectable accounts, but it is difficult to estimate this impact with any precision.

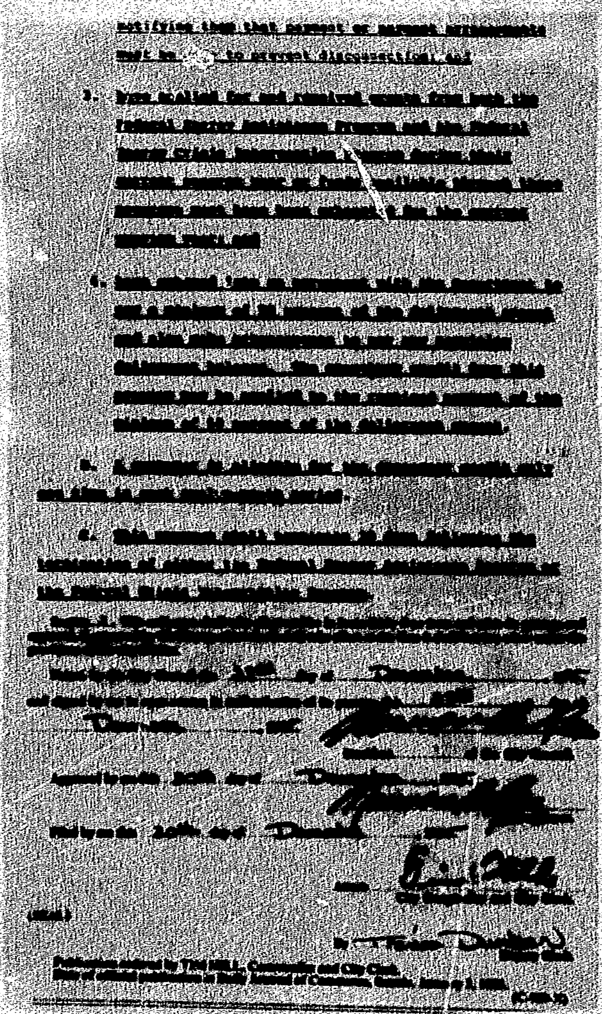
VIII. Implementation

The package of materials from City Light includes a resolution for Council adoption expressing the intent of the City to establish a low income emergency assistance program by setting up a special endowment account. The endowment account and eligibility criteria will be established by ordinance. We would like to have some policy direction on this issue from the Council as part of its overall review of the Utility's 1985 financial position. Although legislation does not need to be adopted immediately, its important to endorse the program in advance of the winter heating season.

One other concept which City Light, DHR and OMB have been exploring is to use City Light bills as a mechanism for our customers to authorize a voluntary contribution to Project Share. Although not directly related to the creation of the special endowment account, it is another strategy for the City to assist in facilitating financial assistance to low-income people who may be facing disconnection of electrical service. We will be prepared to discuss this option with the City Council at the time the proposal for the endowment account is reviewed.



City of Seattle



notifying them that payment or payment arrangements must be [illegible] to prevent disconnection; and

C-929-X

Affidavit of Publication

STATE OF WASHINGTON
KING COUNTY—SS.

The undersigned, on oath states that he is an authorized representative of The Daily Journal of Commerce, a daily newspaper, which newspaper is a legal newspaper of general circulation and it is now and has been for more than six months prior to the date of publication hereinafter refered to, published in the English language continuously as a daily newspaper in Seattle, King County, Washington, and it is now and during all of said time was printed in an office maintained at the aforesaid place of publication of this newspaper. The Daily Journal of Commerce was on the 12th day of June, 1941, approved as a legal newspaper by the Superior Court of King County.

The notice in the exact form annexed, was published in regular issues of The Daily Journal of Commerce, which was regularly distributed to its subscribers during the below stated period. The annexed notice, a

Ordinance No. 112637

was published on January 3, 1986

L. Blair

Subscribed and sworn to before me on

January 3, 1986

Notary Public for the State of Washington, residing in Seattle.