

# RSLPP

## Cheltenham Township

### Smart, Sustainable Green



# Agenda

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1. Overview of RSLPP program
2. PennSEF benefits
3. Pennsylvania GESA Act overview
4. LED advantages
5. Project Preliminary Analysis highlights
6. Moving forward discussion

# RSLPP Program Overview

## Program Scope

- 43 Municipalities
- 4 Counties
- 33,500 Streetlights
- Fixture Replacement & Retrofit Upgrade Solutions
- Simple to Complex Networked Control Systems



# RSLPP Benefits

## RSLPP did the work so you don't have to.

- Developed a common RFP and specification for streetlights
- Selected the most qualified ESCO
  - best service, best costs, and high-quality products
- Obtained transparency on ESCO pricing
  - products, labor, and service costs
- Facilitated ESCO communication of projects
  - So municipalities can make the most informed decision possible
- Vetted and negotiated pricing
  - products, labor, service costs
- Keystone Lighting Solutions (KLS) provided significant technical support and program oversight.
  - DVRPC's costs are FREE
  - KLS' costs are ~\$350/participant
- On-going oversight of ESCO solution development and pricing



# Key Program Features

- ✓ Access to long-term, low interest rate financing (subject to appropriations and **will not increase municipal debt**)
- ✓ Pooled financing organized and administered by PennSEF – which lowers costs for **all** Participants
- ✓ Guaranteed Savings Agreement is a transparent construction contract with a strong guarantee and spells out a monitoring and verification (M&V) plan in detail
- ✓ PennSEF developed all standard contractual documents for program and modified them for RSLPP to the benefit of participants.
- ✓ FREE's legal, financial and technical team assists throughout negotiations and will review each municipal GSA and financial agreement to endure it benefits each participation

# RSLPP Timeline

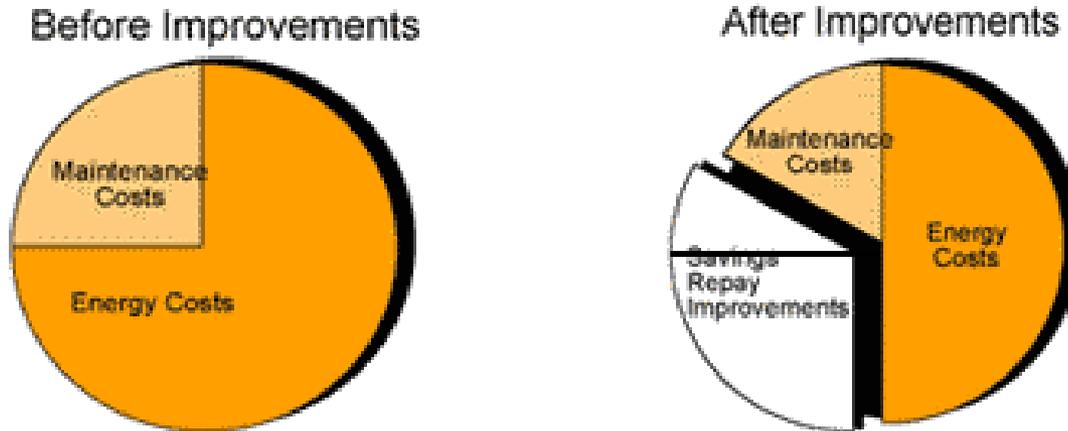


We are here

# Performance Contracting: A Simple Explanation

How do you re-invest in your municipal infrastructure with money you are already spending on utilities and external vendors.

The PA Guaranteed Energy Savings Act is a no-risk way to fund these improvements using future savings instead of capital reserves.



# Performance Contracting: A Simple Explanation

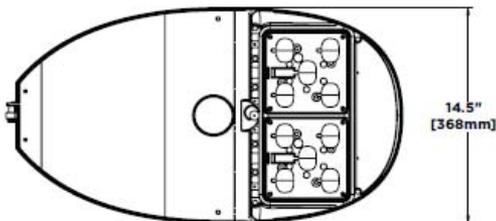
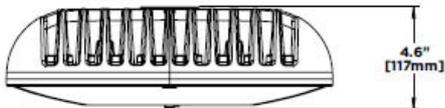
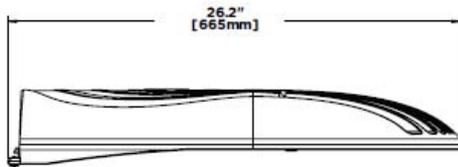
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- Performance Contracting governed by PA Act 77 and PA Act 39
  - PA Acts 77 and 39 enable government entities to enter into a PC agreement for up to 20 years.
  - Project cost, scope and energy savings are guaranteed. Savings must meet or exceed the cost of the project over project term.
  - Savings are generated thorough:
    - Energy – electric, oil, gas, etc
    - Operational/Maintenance – parts, external labor, etc
    - Capital Cost avoidance
  - Engineering, Construction, Commissioning and Measurement & Verification are all managed through ONE company. Best value versus low bid.
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# LED Street Lights Highlights

Commercial Service –  
Cobrahead

400 w → 101 w or less



## Streetlight Timeline

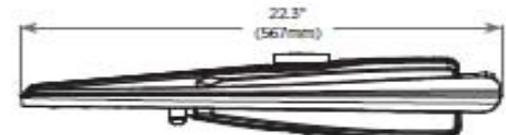
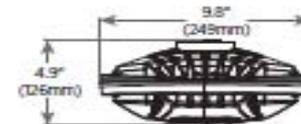
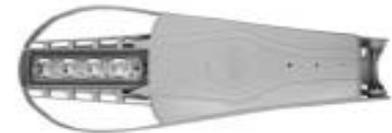
1900's - Incandescent  
1930's - Mercury Vapor  
1960's - HPS  
1970's - Metal Halide  
2010 - LED

## LED Warranty

10 Years complete fixture  
100,00 + burn hours  
life expectancy 25 + years

Residential Service –  
Cobrahead

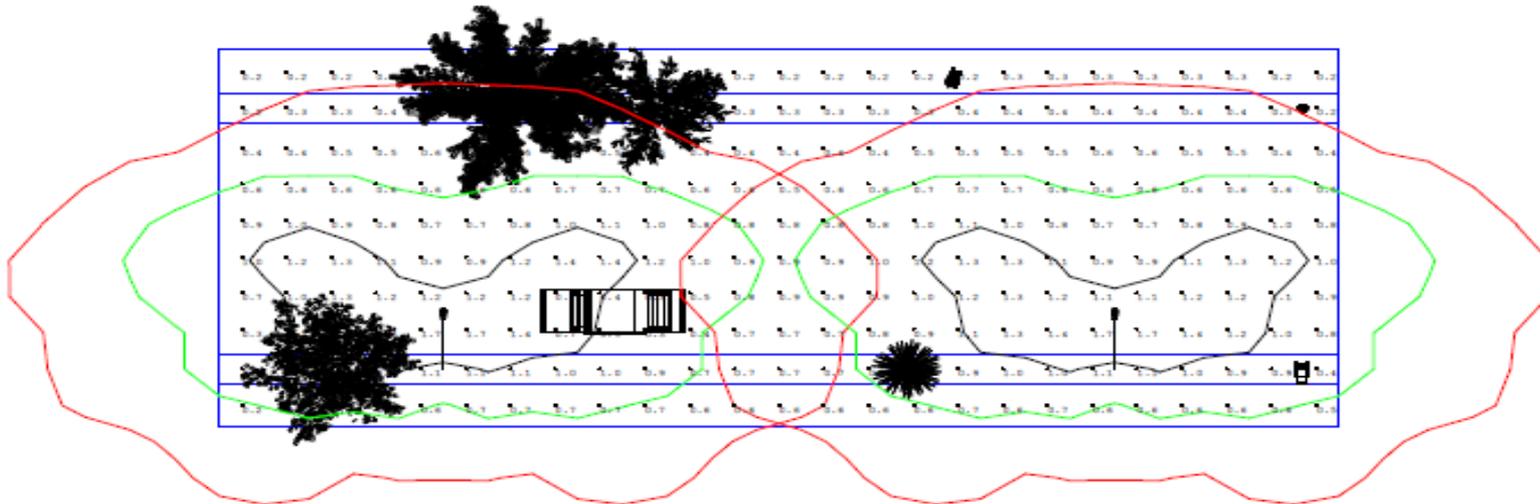
150 w → 53w or less



# Photometrics 150 watt MV

Luminaire Schedule				
Symbol	Qty	Label	Arrangement	Description
→	2	GE 150 MV	SINGLE	0.720 M RL15S RMS2 modified for MV lumens

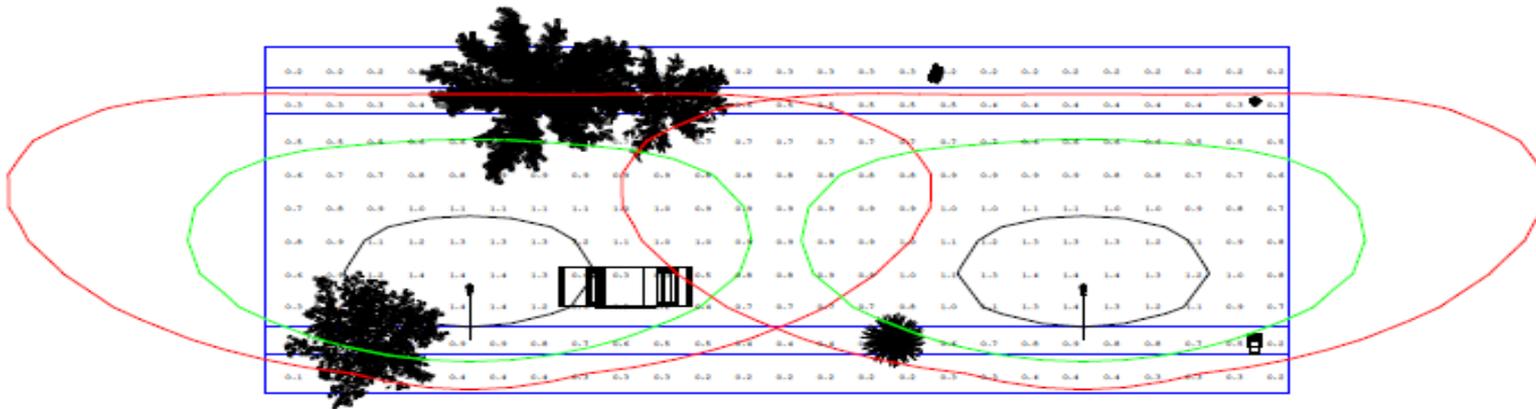
Calculation Summary							
Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
grass bottom_Top_1	Illuminance	Fc	0.80	1.1	0.2	4.00	5.50
grass top_Top_1	Illuminance	Fc	0.32	0.4	0.2	1.60	2.00
roadway_Top_1	Illuminance	Fc	0.84	1.7	0.3	2.80	5.67
sidewalk bottom_Top_1	Illuminance	Fc	0.58	0.7	0.2	2.90	3.50
sidewalk top_Top_1	Illuminance	Fc	0.21	0.3	0.0	N.A.	N.A.



# Photometrics 38 watt LED

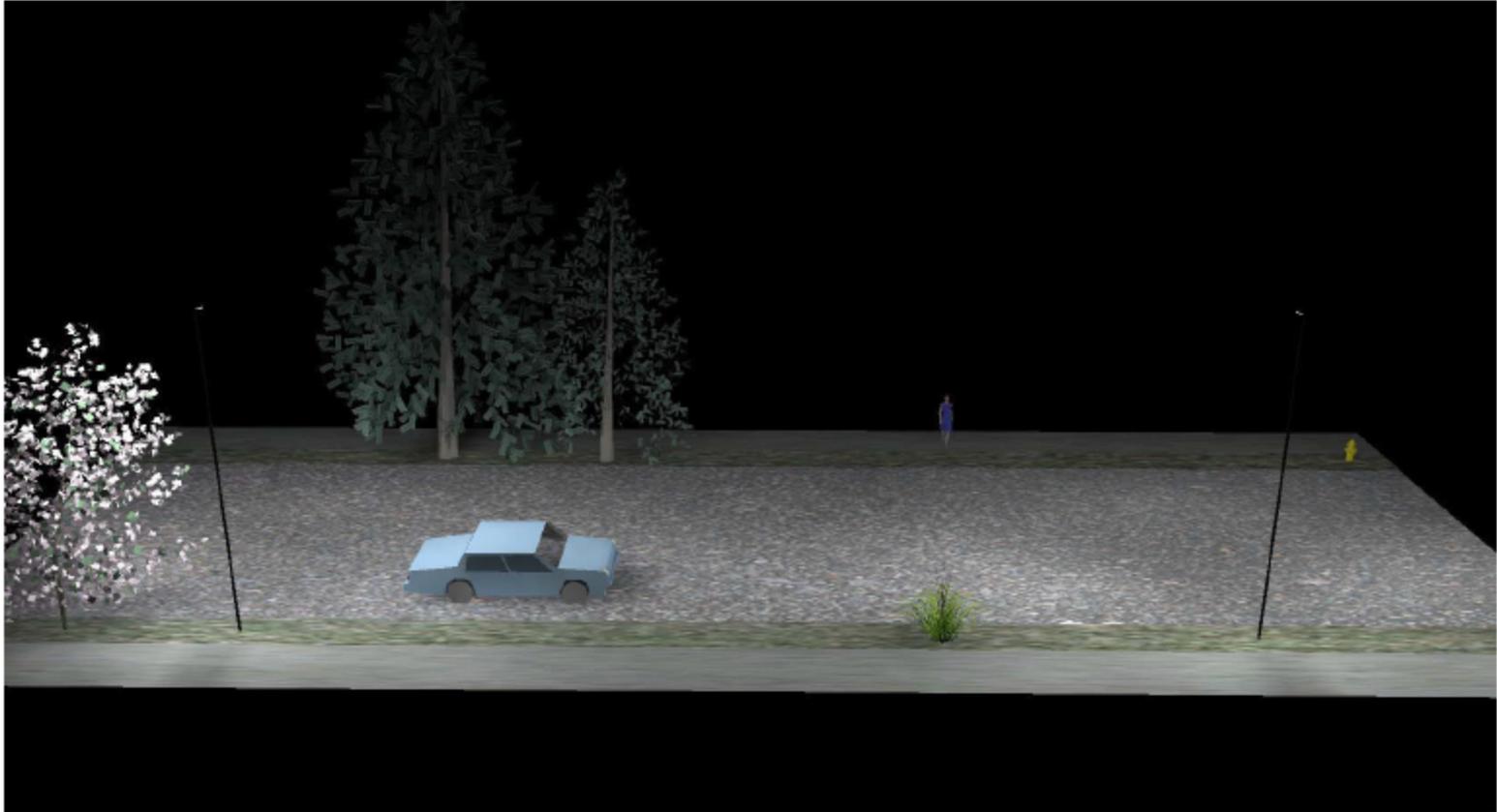
Luminaire Schedule					
Symbol	Qty	Label	Arrangement	LLF	Description
→	2	RFS-35W16LED4K-T-R2M	SINGLE	0.900	RFS-35W16LED4K-T-R2M

Calculation Summary							
Label	CalcType	Units	Avg	Max	Min	Avg/Mir	Max/Min
grass bottom_Top_1	Illuminance	Fc	0.56	0.9	0.1	5.60	9.00
grass top_Top_1	Illuminance	Fc	0.39	0.5	0.2	1.95	2.50
roadway_Top_1	Illuminance	Fc	0.89	1.4	0.2	4.45	7.00
sidewalk bottom_Top_1	Illuminance	Fc	0.28	0.4	0.1	2.80	4.00
sidewalk top_Top_1	Illuminance	Fc	0.20	0.3	0.0	N.A.	N.A.



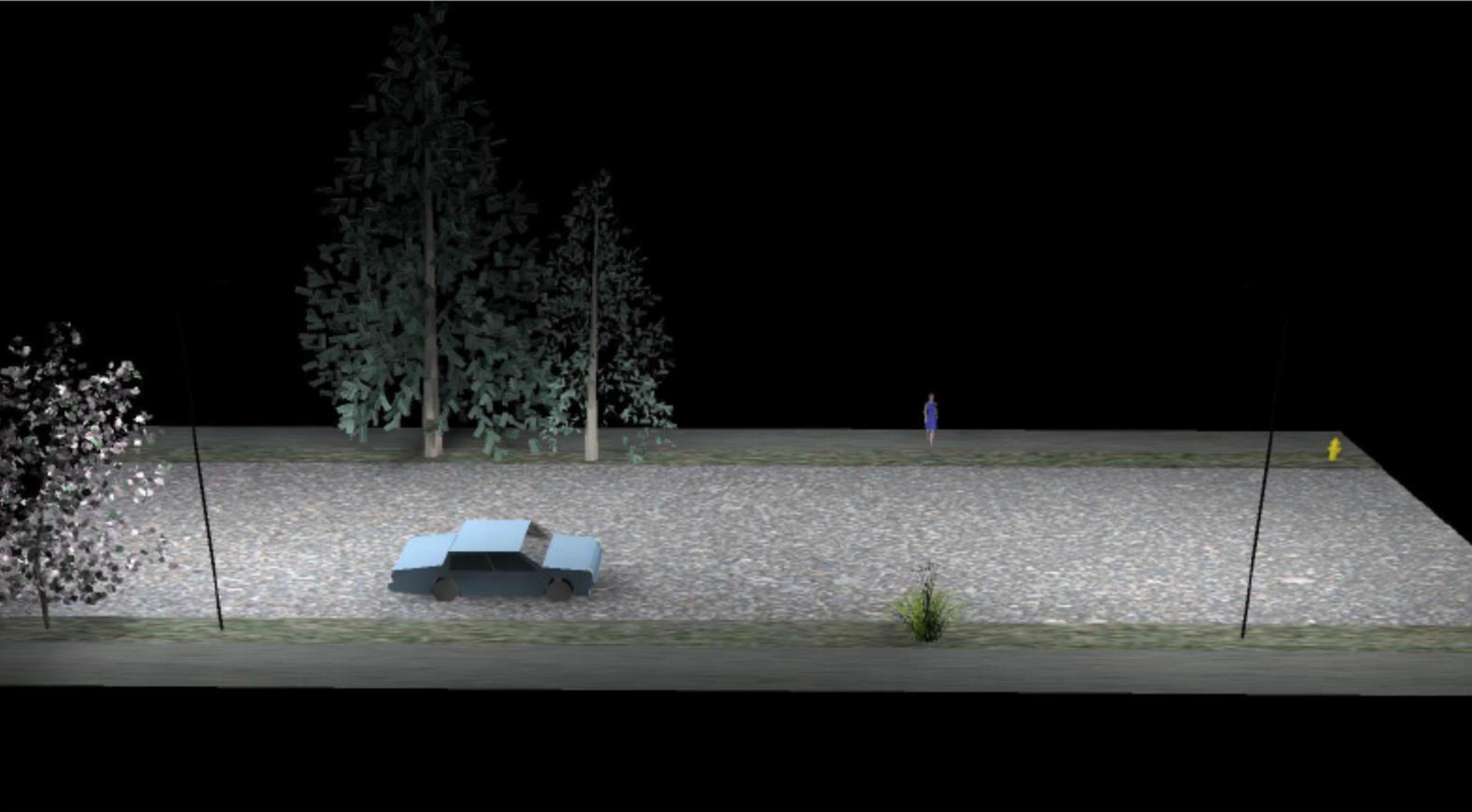
# Photometrics 150 watt MV

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# Photometrics 38 watt LED

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# LED Streetlight's Proven Results

## significantly less energy and superior lighting



*Before (left) & after LED lighting via the L.A. Bureau of Street Lighting*

2009-2011  
Vehicle theft – 13.6%  
Robbery – 8%  
Vandalism – 11%

### Halifax, Nova Scotia (South Street) - 68% Energy Savings



*Before (left) & after LED lighting via the Sustainable City Network*

100 Watt Lamp  
137 Plug Watts

44 Watts  
SAT-48S (48 LEDS) - 280mA

# Energy Conservation Measures (ECM)

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ECM #	Item	Include?
1	Cobrahead Street Lighting - Upgrade to LED	Yes
2	Decorative Street Lighting - Upgrade to LED	Yes
3	Cobrahead - Wireless Street Lighting Controls	Yes
4	Decorative - Wireless Street Lighting Controls	Yes
5	Traffic Lighting - Upgrade to LED	No
6	Exterior Lighting - Upgrade to LED	No
7	Electricity Rate Procurement	Yes

# Current Utility Bill

Type	Size	Fixture (Cobra Head)	Quantity	Billed Wattage	Annual Energy Use (kWh)	Annual Energy Cost (\$)
Mercury Vapor	04000M	100W MV	0	115	0	\$0
Mercury Vapor	08000M	175W MV	0	191	0	\$0
Mercury Vapor	12000M	250W MV	0	275	0	\$0
Mercury Vapor	20000M	400W MV	0	429	0	\$0
Mercury Vapor	42000M	700W MV	0	768	0	\$0
Mercury Vapor	59000M	1000W MV	0	1090	0	\$0
Sodium Vapor	05800S	70W HPS	1727	94	664,287	\$49,310
Sodium Vapor	09500S	100W HPS	655	131	351,114	\$26,063
Sodium Vapor	16000S	150W HPS	344	192	270,268	\$20,062
Sodium Vapor	25000S	250W HPS	232	294	279,107	\$20,718
Sodium Vapor	50000S	400W HPS	0	450	0	\$0
<b>Total</b>			<b>2959</b>		<b>1,565,198</b>	<b>\$116,185</b>
<b>Service Location Distribution Charge*</b>			<b>2937</b>			<b>\$249,528</b>
<b>Modeled Cost for Cobra-heads (annual)</b>						<b>\$365,712</b>

\*Service Location Distribution Charge, also known as the "Tap Fee" is based on \$7.08 per location, per month. This fee is not impacted by the energy reduction from converting street lights to LED, however, it may be impacted by the results of the Investment Grade Audit and the final quantity of street lights determined.

# Energy Savings Summary

## Energy Savings - Street Lighting Energy Savings Summary

The table shows the energy savings associated with converting the cobra-head and decorative fixtures to LED.

Existing					Proposed						Project Savings	
PECO Fixture	Billed Wattage	Quantity	Annual Energy Use (kWh)	Annual Energy Cost (\$)	Style	Manufacturer	New Wattage	Quantity	Annual Energy Use (kWh)	Annual Energy Cost (\$)	Annual Energy Savings (kWh)	Annual Energy Savings (\$)
70W HPS	94	1386	533,122	\$39,574	Cobra	Philips Lumec	38	1386	215,517	\$15,998	317,605	\$23,576
100W HPS	131	405	217,101	\$16,115	Cobra	Philips Lumec	54	405	89,492	\$6,643	127,609	\$9,472
150W HPS	192	344	270,268	\$20,062	Cobra	Philips Lumec	73	344	102,758	\$7,628	167,510	\$12,434
250W HPS	294	232	279,107	\$20,718	Cobra	Philips Lumec	108	232	102,529	\$7,611	176,578	\$13,107
100W INC	103	1	421	\$31	Cobra	Philips Lumec	38	1	155	\$12	266	\$20
70W HPS	94	341	131,165	\$9,736	William & Ma	Alt (Philips / Coop	51	341	71,164	\$5,283	60,001	\$4,454
100W HPS	131	250	134,013	\$9,948	William & Ma	Alt (Philips / Coop	51	250	52,173	\$3,873	81,840	\$6,075
<b>Total - Cobraheads</b>		2368	1,300,020	\$96,501			<b>Total - Cobraheads</b>	2368	510,452	\$37,891	789,568	\$58,610
<b>Total - Decoratives</b>		591	265,178	\$19,684			<b>Total - Decoratives</b>	591	123,337	\$9,155	141,841	\$10,529
<b>Project Total</b>		2959	1,565,198	\$116,185			<b>Total</b>	2959	633,789	\$47,046	931,409	\$69,138
<b>Locations*</b>		2937					<b>Locations*</b>	2937				
<b>Service Location Distribution Charge**</b>		\$249,528					<b>Service Location Distribution Charge**</b>	\$249,528				

\*The final number of locations may vary from the amount shown

\*\*Service Location Distribution Charge, or Tap Fee, is based on \$7.08 per fixture, per month

# Energy Savings Summary

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Conservation Measure	Annual kWh Savings	Monthly kW Savings	Annual Energy Savings (\$)
Street lighting - Upgrade to LED (Cobra)	789,568	193.0	\$58,610
Street lighting - Upgrade to LED (Decorative)	141,841	34.7	\$10,529
Wireless Street Lighting Controls (Cobra)	127,613	-	\$9,473
Wireless Street Lighting Controls (Decorative)	30,834	-	\$2,289
Traffic Lighting - Upgrade to LED	0	0.0	\$0
Exterior Lighting - Upgrade to LED	0	0.0	\$0
Electric Rate Savings (\$/kWh)	-	-	\$4,611
<b>Total - Base Project</b>	<b>931,409</b>	<b>227.6</b>	<b>\$73,749</b>
<b>Total - Base Project + Controls</b>	<b>1,089,856</b>	<b>227.6</b>	<b>\$85,511</b>

# Project Cost & Savings Summary

Conservation Measure	Construction Cost (\$)	Annual Energy Savings (\$)	Annual O&M Savings (\$)	Rebate(\$)	Simple Payback	Simple Payback w/o O&M
Street lighting - Upgrade to LED (Cobra)	\$742,487	\$58,610	\$23,680	\$57,886	8.3	11.7
Street lighting - Upgrade to LED (Decorative)	\$562,129	\$10,529	\$5,910	\$10,399	33.6	52.4
Wireless Street Lighting Controls (Cobra)	\$543,278	\$9,473	\$0	\$12,761	56.0	56.0
Wireless Street Lighting Controls (Decorative)	\$130,295	\$2,289	\$0	\$3,083	55.6	55.6
Traffic Lighting - Upgrade to LED	\$0	\$0	\$0	\$0	-	-
Exterior Lighting - Upgrade to LED	\$0	\$0	\$0	\$0	-	-
Electric Rate Procurement	\$2,674	\$4,611	\$0	\$0	0.6	0.6
<b>Total - Base Project</b>	<b>\$1,307,291</b>	<b>\$73,749</b>	<b>\$29,590</b>	<b>\$68,285</b>	12.0	16.8
<b>Total - Base Project + Controls</b>	<b>\$1,980,864</b>	<b>\$85,511</b>	<b>\$29,590</b>	<b>\$84,130</b>	16.5	22.2

## Project Cash Flow - Base Project-Cobrahead Only

The financing summary for the project is shown in the table below. The interest rate shown may vary once final financing is secured through PennSEF. This project cash flow does not include wireless controls.

JCI Construction Cost		\$742,487		
Paydown of Debt	Capital Contribution	\$0		
	Grants	\$0		
Fees	Customer-Controlled Contingency	\$37,124	<b>Project ECM List</b>	<b>Include?</b>
	PennSEF	\$0	ECM-1: Cobrahead Street Lighting	Yes
	KLS - Program	\$340	ECM-2: Decorative Street Lighting	No
	KLS - Consultant	\$0	ECM-5: Traffic Lighting	No
Loan Structure		Lease	ECM-6: Exterior Lighting	No
Contract Term - Years		20	ECM-7: Electricity Rate Procurement	Yes
Construction Term - Months		12	<b>*Costs only include applicable ECMs</b>	
Loan Payment Frequency		Annual		
Interest Rate		2.75%		
Total Financed Amount		\$779,951		

**20 year  
Status quo cost  
\$2,327,269**

**20 year  
LED Upgrade Savings  
\$1,384,678**

	Measured Savings	Non-measured Savings			Total Savings	Loan Payment	M&V	Balance
	Utility Savings	Operational Savings	Rebates	Capital Avoidance				
Year 0	\$29,832	\$0	\$0	\$0	\$29,832	\$0	\$0	\$29,832
Year 1	\$62,426	\$24,390	\$57,886	\$0	\$144,702	\$129,356	\$15,347	\$0
Year 2	\$63,736	\$25,122	\$0	\$0	\$88,859	\$73,052	\$15,807	\$0
Year 3	\$65,139	\$25,876	\$0	\$0	\$91,014	\$74,733	\$16,281	\$0
Year 4	\$66,572	\$26,652	\$0	\$0	\$93,224	\$93,224	\$0	\$0
Year 5	\$68,103	\$27,452	\$0	\$0	\$95,555	\$95,555	\$0	\$0
Year 6	\$69,669	\$28,275	\$0	\$0	\$97,944	\$97,944	\$0	\$0
Year 7	\$71,341	\$29,123	\$0	\$0	\$100,465	\$100,465	\$0	\$0
Year 8	\$73,054	\$29,997	\$0	\$0	\$103,051	\$103,051	\$0	\$0
Year 9	\$74,880	\$30,897	\$0	\$0	\$105,777	\$105,777	\$0	\$0
Year 10	\$76,752	\$31,824	\$0	\$0	\$108,576	\$22,001	\$0	\$86,575
Year 11	\$78,747	\$32,779	\$0	\$0	\$111,526	\$0	\$0	\$111,526
Year 12	\$80,795	\$33,762	\$0	\$0	\$114,557	\$0	\$0	\$114,557
Year 13	\$82,976	\$34,775	\$0	\$0	\$117,751	\$0	\$0	\$117,751
Year 14	\$85,217	\$35,818	\$0	\$0	\$121,035	\$0	\$0	\$121,035
Year 15	\$87,603	\$36,893	\$0	\$0	\$124,495	\$0	\$0	\$124,495
Year 16	\$90,056	\$37,999	\$0	\$0	\$128,055	\$0	\$0	\$128,055
Year 17	\$92,667	\$39,139	\$0	\$0	\$131,807	\$0	\$0	\$131,807
Year 18	\$95,355	\$40,314	\$0	\$0	\$135,668	\$0	\$0	\$135,668
Year 19	\$98,120	\$41,523	\$0	\$0	\$139,643	\$0	\$0	\$139,643
Year 20	\$100,965	\$42,769	\$0	\$0	\$143,734	\$0	\$0	\$143,734
<b>Total</b>	<b>\$1,614,004</b>	<b>\$655,379</b>	<b>\$57,886</b>	<b>\$0</b>	<b>\$2,327,269</b>	<b>\$895,156</b>	<b>\$47,435</b>	<b>\$1,384,678</b>

## Project Cash Flow - Cobrahead & Decorative

The financing summary for the project is shown in the table below. The interest rate shown may vary once final financing is secured through PennSEF. This project cash flow does not include wireless controls.

JCI Construction Cost		\$1,307,291		
Paydown of Debt	Capital Contribution	\$0		
	Grants	\$0		
Fees	Customer-Controlled Contingency	\$65,365	<b>Project ECM List</b>	<b>Include?</b>
	PennSEF	\$0	ECM-1: Cobrahead Street Lighting	Yes
	KLS - Program	\$340	ECM-2: Decorative Street Lighting	Yes
	KLS - Consultant	\$0	ECM-5: Traffic Lighting	No
Loan Structure		Lease	ECM-6: Exterior Lighting	No
Contract Term - Years		20	ECM-7: Electricity Rate Procurement	Yes
Construction Term - Months		12	<b>*Costs only include applicable ECMs</b>	
Loan Payment Frequency		Annual		
Interest Rate		2.75%		
Total Financed Amount		\$1,372,995		

**20 year  
Status quo cost  
\$2,907,879**

**20 year  
LED Upgrade Savings  
\$1,146,716**

	Measured Savings	Non-measured Savings			Total Savings	Loan Payment	M&V	Balance
	Utility Savings	Operational Savings	Rebates	Capital Avoidance				
Year 0	\$37,538	\$0	\$0	\$0	\$37,538	\$0	\$0	\$37,538
Year 1	\$78,146	\$30,478	\$68,285	\$0	\$176,909	\$149,354	\$27,554	\$0
Year 2	\$79,787	\$31,392	\$0	\$0	\$111,179	\$82,798	\$28,381	\$0
Year 3	\$81,542	\$32,334	\$0	\$0	\$113,876	\$84,644	\$29,233	\$0
Year 4	\$83,336	\$33,304	\$0	\$0	\$116,640	\$116,640	\$0	\$0
Year 5	\$85,253	\$34,303	\$0	\$0	\$119,556	\$119,556	\$0	\$0
Year 6	\$87,214	\$35,332	\$0	\$0	\$122,546	\$122,546	\$0	\$0
Year 7	\$89,307	\$36,392	\$0	\$0	\$125,699	\$125,699	\$0	\$0
Year 8	\$91,450	\$37,484	\$0	\$0	\$128,934	\$128,934	\$0	\$0
Year 9	\$93,737	\$38,608	\$0	\$0	\$132,345	\$132,345	\$0	\$0
Year 10	\$96,080	\$39,766	\$0	\$0	\$135,847	\$135,847	\$0	\$0
Year 11	\$98,578	\$40,959	\$0	\$0	\$139,538	\$139,538	\$0	\$0
Year 12	\$101,141	\$42,188	\$0	\$0	\$143,329	\$143,329	\$0	\$0
Year 13	\$103,872	\$43,454	\$0	\$0	\$147,326	\$147,326	\$0	\$0
Year 14	\$106,677	\$44,758	\$0	\$0	\$151,434	\$47,440	\$0	\$103,994
Year 15	\$109,663	\$46,100	\$0	\$0	\$155,764	\$0	\$0	\$155,764
Year 16	\$112,734	\$47,483	\$0	\$0	\$160,217	\$0	\$0	\$160,217
Year 17	\$116,003	\$48,908	\$0	\$0	\$164,911	\$0	\$0	\$164,911
Year 18	\$119,367	\$50,375	\$0	\$0	\$169,742	\$0	\$0	\$169,742
Year 19	\$122,829	\$51,886	\$0	\$0	\$174,715	\$0	\$0	\$174,715
Year 20	\$126,391	\$53,443	\$0	\$0	\$179,834	\$0	\$0	\$179,834
<b>Total</b>	<b>\$2,020,647</b>	<b>\$818,947</b>	<b>\$68,285</b>	<b>\$0</b>	<b>\$2,907,879</b>	<b>\$1,675,996</b>	<b>\$85,168</b>	<b>\$1,146,716</b>

## Project Cash Flow - Base Project + Controls

The financing summary for the project is shown in the table below. The interest rate shown may vary once final financing is secured through PennSEF. This project INCLUDES controls.

JCI Construction Cost		\$1,980,864		
Paydown of Debt	Capital Contribution	\$0		
	Grants	\$0		
Fees	Customer-Controlled Contingency	\$99,043	<b>Project ECM List</b>	
	PennSEF	\$0	ECM-1: Cobrahead Street Lighting	Yes
	KLS - Program	\$340	ECM-2: Decorative Street Lighting	Yes
	KLS - Consultant	\$0	ECM-3: Cobrahead Wireless Controls	Yes
Loan Structure		Lease	ECM-4: Decorative Wireless Controls	Yes
Contract Term - Years		20	ECM-5: Traffic Lighting	No
Construction Term - Months		12	ECM-6: Exterior Lighting	No
Loan Payment Frequency		Annual	ECM-7: Electricity Rate Procurement	Yes
Interest Rate		2.75%	*Costs only include applicable ECMs	
Total Financed Amount		\$2,080,247		

**20 year  
Status quo cost  
\$3,118,472**

**20 year  
LED Upgrade Savings  
\$360,166**

	Measured Savings	Non-measured Savings			Total Savings	Loan Payment	M&V	Balance
	Utility Savings	Operational Savings	Rebates	Capital Avoidance				
Year 0	\$43,525	\$0	\$0	\$0	\$43,525	\$0	\$0	\$43,525
Year 1	\$88,791	\$30,478	\$84,130	\$0	\$203,399	\$188,015	\$15,384	\$0
Year 2	\$90,656	\$31,392	\$0	\$0	\$122,048	\$106,203	\$15,845	\$0
Year 3	\$92,650	\$32,334	\$0	\$0	\$124,984	\$108,663	\$16,320	\$0
Year 4	\$94,688	\$33,304	\$0	\$0	\$127,992	\$127,992	\$0	\$0
Year 5	\$96,866	\$34,303	\$0	\$0	\$131,169	\$131,169	\$0	\$0
Year 6	\$99,094	\$35,332	\$0	\$0	\$134,426	\$134,426	\$0	\$0
Year 7	\$101,472	\$36,392	\$0	\$0	\$137,864	\$137,864	\$0	\$0
Year 8	\$103,908	\$37,484	\$0	\$0	\$141,391	\$141,391	\$0	\$0
Year 9	\$106,505	\$38,608	\$0	\$0	\$145,114	\$145,114	\$0	\$0
Year 10	\$109,168	\$39,766	\$0	(\$7,398)	\$141,537	\$141,537	\$0	\$0
Year 11	\$112,006	\$40,959	\$0	(\$7,398)	\$145,568	\$145,568	\$0	\$0
Year 12	\$114,919	\$42,188	\$0	(\$7,398)	\$149,709	\$149,709	\$0	\$0
Year 13	\$118,021	\$43,454	\$0	(\$7,398)	\$154,077	\$154,077	\$0	\$0
Year 14	\$121,208	\$44,758	\$0	(\$7,398)	\$158,567	\$158,567	\$0	\$0
Year 15	\$124,602	\$46,100	\$0	(\$7,398)	\$163,304	\$163,304	\$0	\$0
Year 16	\$128,091	\$47,483	\$0	(\$7,398)	\$168,176	\$168,176	\$0	\$0
Year 17	\$131,805	\$48,908	\$0	(\$7,398)	\$173,315	\$173,315	\$0	\$0
Year 18	\$135,628	\$50,375	\$0	(\$7,398)	\$178,605	\$178,605	\$0	\$0
Year 19	\$139,561	\$51,886	\$0	(\$7,398)	\$184,049	\$57,061	\$0	\$126,988
Year 20	\$143,608	\$53,443	\$0	(\$7,398)	\$189,653	\$0	\$0	\$189,653
<b>Total</b>	<b>\$2,296,773</b>	<b>\$818,947</b>	<b>\$84,130</b>	<b>(\$81,378)</b>	<b>\$3,118,472</b>	<b>\$2,710,756</b>	<b>\$47,549</b>	<b>\$360,166</b>

\*\*\*Capital Cost Avoidance in year 11-20 represents amount to be budgeted for Telensa controls refresh

# Investment Grade Audit Costs

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Energy Conservation Measure	JCI Hard Cost (\$)	IGA (%)	IGA Cost (\$)
Street lighting - Upgrade to LED (Cobra)	\$566,352	7.4%	\$41,910
Street lighting - Upgrade to LED (Decorative)	\$452,144	7.4%	\$33,459
Wireless Street Lighting Controls (Cobra)	\$414,400	7.4%	\$30,666
Wireless Street Lighting Controls (Decorative)	\$103,425	7.4%	\$7,653
Traffic Lighting - Upgrade to LED	\$0	7.4%	\$0
Exterior Lighting - Upgrade to LED	n/a	n/a	\$0
Electric Rate Procurement	\$2,040	7.4%	\$151
Other Municipality Requests			\$0
<b>Total</b>			<b>\$113,839</b>

The Preliminary Analysis is a financial model/ decision tool to either move forward to the Investment Grade Audit or stop the process.

# Questions?

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