

2000

Westside Dixon Associates v. Utah Power and Light Company/Pacificorp, Utah Public Service Commission : Reply Brief

Utah Supreme Court

Follow this and additional works at: https://digitalcommons.law.byu.edu/byu_sc2



Part of the [Law Commons](#)

Original Brief Submitted to the Utah Supreme Court; digitized by the Howard W. Hunter Law Library, J. Reuben Clark Law School, Brigham Young University, Provo, Utah; machine-generated OCR, may contain errors.

J. Kent Holland; Anderson and Holland; Attorney for Petitioner.

Mark E. Hindley; Stoel Rives LLP; Sandy Mooy; Attorneys for Respondent.

Recommended Citation

Reply Brief, *Westside Dixon Associates v. Utah Power & Light Co.*, No. 20000731.00 (Utah Supreme Court, 2000).
https://digitalcommons.law.byu.edu/byu_sc2/561

This Reply Brief is brought to you for free and open access by BYU Law Digital Commons. It has been accepted for inclusion in Utah Supreme Court Briefs by an authorized administrator of BYU Law Digital Commons. Policies regarding these Utah briefs are available at http://digitalcommons.law.byu.edu/utah_court_briefs/policies.html. Please contact the Repository Manager at hunterlawlibrary@byu.edu with questions or feedback.

BEFORE THE UTAH SUPREME COURT

Respondents.

Case Number: 2000 0731 SC

PAT BARTHOLOMEW
CLERK OF THE COURT

BEFORE THE UTAH SUPREME COURT

In the Matter of the Complaint of WESTSIDE DIXON ASSOCIATES L.L.C.,)	REPLY BRIEF OF
)	PETITIONER WESTSIDE
)	DIXON ASSOCIATES L.L.C
)	
Petitioner,)	Priority No. 15
)	
UTAH POWER & LIGHT COMPANY/ PACIFICORP, UTAH PUBLIC SERVICE COMMISSION)	Case Number: 2000 0731 SC
)	
)	
Respondents.)	
)	

REPLY BRIEF OF
PETITIONER WESTSIDE
DIXON ASSOCIATES L.L.C

Case Number: 2000 0731 SC

APPEAL FROM TWO ADMINISTRATIVE ORDERS
OF THE PUBLIC SERVICE COMMISSION
SALT LAKE COUNTY, STATE OF UTAH
(ADMINISTRATIVE LAW JUDGE A. ROBERT THURMAN)

**J. Kent Holland, #1520
ANDERSON & HOLLAND
Attorney for Petitioner
623 East First South
P.O. Box 11643
Salt Lake City, Utah 84147-0643
Telephone: (801) 363-9345**

Sandy Mooy
Attorney for Respondent Utah
Public Service Commission
Heber J. Wells Building
160 East 300 South
P.O. Box 45585
Salt Lake City, Utah 84145-0585
Telephone: (801) 530-6708

COMPLETE LIST OF ALL PARTIES

Pursuant to Rule 24 (a) (1) of the Utah Rules of Appellate procedure, the undersigned counsel for Petitioner represents that the named parties, Westside Dixon Associates, L.L.C., Utah Power & Light Company/PacifiCorp, and Utah Public Service Commission, are and have been the only parties to this litigation.

TABLE OF CONTENTS

	<u>Page</u>
INTRODUCTION	1
ARGUMENT	
A. UTAH POWER & LIGHT/PACIFICORP, HEREINAFTER REFERRED TO AS “PACIFICORP”, IS IN ERROR IN THEIR STATEMENT, APPEARING ON PAGE 2 OF ITS BRIEF, THAT PACIFICORP’S WAIVER OF ITS RIGHT TO OBJECT TO THE MASTER METER-SUB METERING IS NOT PROPERLY BEFORE THIS COURT BECAUSE IT ALLEGEDLY WAS NOT TIMELY RAISED. WESTSIDE RAISED THAT ISSUE AT THE ADMINISTRATIVE LEVEL	1
B. UTAH POWER & LIGHT/PACIFICORP, HEREINAFTER REFERRED TO AS “PACIFICORP”, IS IN ERROR IN THEIR STATEMENT, APPEARING ON PAGE 2 OF ITS BRIEF, THAT WESTSIDE’S CLAIM THAT THE PSC’S APPLICATION OF PURPA VIOLATES DUE PROCESS AND EQUAL PROTECTION UNDER THE FOURTEENTH AMENDMENT OF UNITED STATES CONSTITUTION IS NOT PROPERLY BEFORE THIS COURT BECAUSE IT ALLEGEDLY WAS NOT TIMELY RAISED. WESTSIDE RAISED THAT ISSUE AT THE ADMINISTRATIVE LEVEL	2

C.	THE PSC COMMITTED REVERSIBLE ERROR IN APPLYING THE ADMINISTRATIVE RULE 746-210, TO THE BROADWAY LOFTS CONDOMINIUMS (LOFTS), BY CONSTRUING THE J.G. MCDONALD BUILDING CONSTRUCTED IN 1901 AS A “NEW” BUILDING CONSTRUCTED AFTER AUGUST 1, 1984 <u>AS REQUIRED</u> FOR THE APPLICATION OF R746-210	3
D.	THE PSC MISAPPLIED THE LAW TO THIS PROJECT IN ITS FAILURE TO RECOGNIZE THE COST EFFECTIVE EXCEPTION WHEN APPLYING THE ADMINISTRATIVE RULE 746-210, (“PURPA”)	5
E.	PACIFICORP, BY ITS ACCEPTANCE OF THE PLANS SHOWING MASTER METERING/SUB METERING IN FEBRUARY 1998, HAD WAIVED ANY RIGHT TO OBJECT TO THE MASTER METERING/SUB METERING OF THE LOFTS OVER ONE AND ONE HALF YEARS LATER	8
F.	THE PSC’S INTERPRETATION OF R746-210, OR R746-210 BY ITS SPECIFIC TERMS DISCRIMINATES AGAINST THE OWNERS/TENANTS OF THE BROADWAY LOFTS CONDOMINIUMS IN THE AMOUNT THEY ARE REQUIRED TO PAY FOR ELECTRIC SERVICE.....	9
CONCLUSION		11

TABLE OF AUTHORITIES

Page

Cases

<u>Deland v. Uintah County</u>	5
945 P.2d 172 (Utah App. 1997)	
<u>Living Scriptures, Inc. v. Kudlik</u>	9, 12
890 P.2d 7 (Utah App.1995)	
<u>Mountain States Legal Foundation v. Utah Public Service Commission</u>	9,12
636 P.2d 1047 (Utah 1981)	
<u>Skinner v. Oklahoma</u>	10
316 U.S. 535 (1942)	

Statutes

<u>United States Constitution, Fourteenth Amendment</u>	2
<u>16 USCS § 2525 (d) Master metering (3)</u>	3
<u>Federal Public Utilities Regulatory Policies Act</u>	3

Rules

<u>Administrative Rule 746-210</u>	3,4,5,7,9, 11
<u>Administrative Rule 746-210-3</u>	5
<u>Administrative Rule 746-210-3-A</u>	4
<u>Administrative Rule 746-210-3-B</u>	6
<u>Administrative Rule 746-210-3-D</u>	7,11
<u>Uniform Building Code Rule 106.1 Salt Lake City 1997</u>	4

I. INTRODUCTION

Complainant/Petitioner, Westside Dixon Associates submits this Brief in reply to the Briefs of Respondents, Utah Power & Light Company/PacifiCorp and the Public Service Commission of Utah.

Westside Dixon, hereinafter referred to as “Westside”, stands by its legal analysis of each issue as set forth in its Opening Brief. It is Westside’s desire to limit the repetition of arguments that are set forth with confidence in the Opening Brief.

II. ARGUMENT

A. Utah Power & Light/PacifiCorp, hereinafter referred to as “PacifiCorp”, is in error in their statement, appearing on page 2 of its Brief, that PacifiCorp’s waiver of its right to object to the master meter-sub metering is not properly before this Court because it allegedly was not timely raised. Westside raised that issue at the administrative level.

PacifiCorp fails to understand that an “application” to an administrative agency is not only the initial complaint form, filled out by the complaining party but also it is every pleading or action including the administrative hearing contained in the administrative record. Complainant/Petitioner Westside has marshaled this record of the application. Westside, in its Petition for Review before the Public Service Commission of Utah, hereinafter referred to as the “PSC”, stated in Point 5 “Respondents (PacifiCorp) has waived any right it may have had

to object to the master metering of electric power to Broadway Lofts” **Tr. 0076**. It was also contained in Reply Memorandum Petition For Review **Tr. 0087 pp.4-5**. This issue was premised in testimony concerning the length of time which PacifiCorp had knowledge of the sub metering system of Broadway Lofts at the hearing before the PSC. **Tr. 0115 pp 9-11**. Therefore, the question of waiver is properly before this Court.

- B. Utah Power & Light/PacifiCorp, hereinafter referred to as “PacifiCorp”, is in error in its statement, appearing on page 2 of its Brief, and the PSC is in error in its statement appearing on page 2 of its Brief, that Westside’s claim that the PSC’s application of PURPA violates due process and equal protection under the Fourteenth Amendment of United States Constitution is not properly before this Court because it allegedly was not timely raised. Westside raised that issue at the administrative level.**

Again PacifiCorp fails to understand that an “application” to an administrative agency is not only the initial complaint form, filled out by the complaining party that initiates the administrative process, but it is every pleading or action including the administrative hearing contained in the administrative record. In its Formal Complaint **Tr. 0001** Westside raised the issue of PURPA and its improper application to Westside. By doing so, Westside properly raised this issue. Further, Westside’s Reply Memorandum Petition For Review **Tr. 0087 p.6** Westside raised this issue. Westside raised this issue on testimony at the hearing before the PSC that, if qualified under PURPA as defined by the PSC, they would receive the electric

service at a lower rate than if PSC said they were not qualified. **Tr. 0115 pp 13-14.**

This was even though the type of dwelling complex and use were exactly the same as Dakota Lofts. Broadway Lofts is master metered for gas and receives a lower rate as such. **Tr. 0115 pp 6-7.** The PSC failed to make any factual or legal determinations on the Broadway Lofts for master metering on both natural gas and electricity. It further failed to recognize individual responsibility for the gas used by each unit due to the electronic metering. If the electricity were to be allowed to be master metered/sub metered, it would accomplish the exact intentions of the conservation policy contained in the Federal Public Utilities Regulatory Policies Act (PURPA). In **16 USCS § 2625 (d) Master metering. (3)**, [see addendum in the PSC Brief], (PURPA) if the long run benefits to the electric consumers in such building exceed the cost of purchasing and installing separate meters in such building, master metering/ sub metering is allowed under PURPA. There is no question that the long run benefits to the electric consumers in the Broadway Lofts far exceed the cost of the purchasing and installing separate meters. The cost of purchasing and installing the meters is \$100.00, **Tr. 0115 p.52**; the present value for savings to the electric consumer in the Broadway Lofts would amount to **\$2,860** per condominium unit. **Tr. 0094.** Therefore, this issue was timely raised.

C. The PSC committed reversible error in applying the Administrative Rule 746-210, to the Broadway Lofts Condominiums (Lofts), by construing the J.G. McDonald

Building constructed in 1901 as a “new” building constructed after August 1, 1984 as required for the application of R746-210.

It is undisputable that the J.G. McDonald Building was constructed in 1901. **Tr.**

0044, Tr.0068. The Uniform Building Code that is adopted by Salt Lake City states that no building or structure “ ... shall be erected, constructed, enlarged, altered, repaired, moved, improved, converted or demolished...” without a permit. *See 106.1 1997*

Uniform Building Code. The building permit, upon which the PSC relied in construing the J.G. McDonald Building as a new building, is not for the erection or construction of the building but for the renovation of an existing structure. **Tr.0068, Tr. 0115, Exhibit**

8. This is the same building permit that would be used to repair a building, or to improve a building. If you repair a building it does not make it a new building, nor if you improve a building does it make it a new building. Hence, renovation of a building does not make it a new building. The Uniform Building Code defines an existing structure as “ A structure erected prior to the date of adoption of the appropriate code, or one for which a legal building permit has been issued.” **1997 Uniform Building Code.** This is directly applicable to the J.G. McDonald Building. It would be absurd to claim that the permit referred to in R746-210-3 A. applied to any and all types of building permits. Obviously, it does not apply to a demolition building permit, or a permit for a new water heater in your home, or finish the basement, add a patio cover, make a repair of over \$500 dollars, or any type of alteration. R746-210-3 A., upon which the PSC relies, defines

construction beginning “when footings are poured”. **Tr. 0115** Hearing Brief Exhibit 4. The footings for this building were poured during or before 1901. By no stretch of the imagination can this building be considered a new building, not even for the sole purpose of allowing PacifiCorp to charge the building residents more money for their electrical power. The J.G. McDonald Building that houses the Broadway Loft Condominiums is not, by any stretch of the imagination, a new building subject to R746-210-3. See *Deland v. Uintah County*, 945 P.2d 172(Utah App. 1997).

The plain language of new building means a new building from the foundation up. Therefore, the J.G. Building cannot be interpreted to be a new building. In plain and unambiguous language, it is an old building. Even PacifiCorp knows it is not a new building. **Tr0115 p.48** Therefore, Administrative Rule 746-210 does not apply to the Broadway Lofts

D. The PSC misapplied the law to this project in its failure to recognize the cost effective exception when applying the Administrative Rule 746-210, (“PURPA”).

For hypothetical reasons only, assume that J.G. McDonald Building, that houses the Broadway Lofts, is a new building. A marshalling of all of the evidence presented to the PSC, and the reasonable inference to be drawn there from, completely supports the conclusion that master metering/sub metering meets the cost effectiveness exemption under R746-210. The master metered multi-unit residential complexes are billed at a

lower per kilowatt rate than units individually metered by PacifiCorp. Master metered complexes are billed on Schedule No. 6. **Tr. 0064-65**. While those individually metered by PacifiCorp are billed under Schedule 1. **Tr. 0058-59**. L. Deane Smith, C.P.A. in his first affidavit **Tr. 0087** demonstrated the cost effectiveness of master metering for the residents of the Broadway Lofts by utilizing the data pertaining to the Dakota Lofts, a similar building, **Tr. 0095-96**, that had operated for over 4 years with a master metered / sub metered electrical power. **Tr. 0098.**, **Tr. 0115 p.44** The Dakota Lofts were properly billed under Rate Schedule 6. **Tr. 0115 p.12**. Relms Inc., the company that sub meters both the gas and electricity, charges \$4.50 per unit per month for its billing service. If the gas company, Questar, and PacifiCorp installed separate meters, the combined monthly billing charge per unit is \$5.98. **Tr. 0097-98, Tr. 0115 p.9**. Mr. Smith in this first affidavit showed that the annual expected savings per unit would be **\$148.61** per unit. **Tr. 0093**. Applying the format specified in R746-210-3 B., the present value for savings would amount to **\$2,860** per condominium unit. **Tr. 0094**. The PSC in its Order Granting Review **TR. 0079** to required Westside to do the cost-benefit analysis using only Rate Schedule 1 **Tr. 0058-59**, instead of the correct rate, Rate Schedule 6 **Tr. 0064-65**".

It is apparent that the PSC erred in its requirement that Westside only use Schedule 1 in its cost-benefit analysis. Rate schedule 6 is specifically for master metered buildings.

However, Westside did do a second cost-benefit analysis using the improper Rate Schedule 1, as requested by the PSC, and yet there still was a cost-benefit as required under R746-210. See the second Affidavit of L. Deane Smith, C.P.A. **Tr. 0109** that demonstrated a \$17.78 per unit per annum savings or \$342 present value for each unit **Tr. 0104.** PacifiCorp's only defense to both of the cost-benefit analysis done is the claim Westside did not do its cost-benefit analysis properly, yet PacifiCorp failed to provide the required "lump sum differential cost reflecting the purchase and installation of separate meters versus a single meter" dictated by R746-210-3 D. **Tr. 0041.** Therefore the cost-benefit analysis was done correctly pursuant to R746-210 or if it failed, it was the result of PacifiCorp's intentional or negligent failure to provide the required differential costs under R746-210-3 D. **Tr. 0041.** Further, this master meter/ sub metering of Broadway Lofts is cost saving to PacifiCorp in that it requires the reading of only one meter instead of 58 meters and the sending of only one bill instead of 58. This is obviously a cost saving for PacifiCorp. Questar recognizes this cost savings, that is why Broadway Lofts' natural gas is master metered/sub metered. **Tr. 0115 pp 6-7, Tr. 0053.** The PSC in their appeal brief on pages 6 –8 states that PURPA specifically applies to the conservation of electric energy and the conservation of natural gas and further states that they must be treated the same. If this is true, the electric energy must be master metered/sub metered the same as the natural gas. The PSC mistakenly believes that each unit in

the Broadway Lofts is or can be separately metered by the gas company, as well as the electric company. That is categorically false. The Broadway Lofts is master metered for gas. The natural gas is not separately stubbed to allow for individual metering. The sub metering of the gas to each unit, is done through an electronic sub metering system that is not available for use by Questar. Therefore to be treated the same under PURPA, Broadway Lofts must be master metered for electricity.

E. PacifiCorp, by its acceptance of the plans showing master metering/sub metering in February 1998, had waived any right to object to the master metering/sub metering of the Lofts over one and one half years later.

The PSC improperly applied the law in its failure to recognize that PacifiCorp, by its acceptance of the plans showing master metering/sub metering, had waived any right to object to the master metering/sub metering of the Broadway Lofts. The electrical plans were submitted in February 1998, for review and approval. **Tr. 0115, Exhibits 1.and 2.** The purpose for this review and approval is to give notice to PacifiCorp such that its own engineers can specify the proper size of transformers, feeder lines, switch gear and meter can(s) for the building. PacifiCorp did review the plans and specified a three meter base can for the building, two for the commercial portion (future restaurant per Utah Power& Light [PacifiCorp] requirement) **see attachment #1**, and one for the residential. One meter can for residential shows that the project is master metered. The Plans

further specified the Relms sub metering system. **Tr. 0115 p.10. See attachment #1,** PacifiCorp built the electrical service to the Lofts as a master metered building. **Tr. 0115 p.17.** PacifiCorp by this acceptance waived its right to object to the installation 2 years later. See *Living Scriptures, Inc. v. Kudlik*, 890 P.2d 7 (Utah App. 1995).

PacifiCorp was aware of its right to object to the master metering/sub metering. **Tr. 0115 p.44** Further, it was aware that if it approved the plans that it relinquished its right to object. **See attachment #2,** PacifiCorp has waived its right to change the master metered/sub metered to individual PacifiCorp meters.

F. The PSC's interpretation of R746-210, or R746-210 by its specific terms discriminates against the owners/tenants of the Broadway Lofts Condominiums in the amount they are required to pay for electric service.

The PSC is required to perform an extremely delicate function of balancing interest of having financially sound utilities that provide essential goods and services against public interest of having goods and services made available without discrimination and on the basis of reasonable cost. Therefore, it is important that persons in similar circumstances pay the same amount for their utility. Ratemaking utilities are barred from treating similar situated persons differently. See *Mountain States Legal Foundation v. Utah Public Service*

Commission, 636 P.2d 1047 (Utah 1981). See also *Skinner v. Oklahoma* 316 US 535 US (1942).

The owner/tenants of buildings that contain a central boiler and chiller are exempt from PURPA and therefore billed under Rate Schedule 6, **Tr. 0064-5**. A central boiler and chiller means that there is only one gas meter for the building tenants. Since the gas in Broadway Lofts is master metered, it is the same situation as a central boiler and chiller. The discrimination between those with a central boiler and chiller and those without is not based on “adequate findings of fact, supported by evidence, which demonstrate a rational basis”. To not allow both to be master metered is discrimination without justification. This discrimination constitutes a violation of the Broadway Loft tenant/owners right to equal protection under the law. The fact that the service is master metered and sub metered is the best of both worlds. It gives the lower cost without improper discrimination to the owner/tenant; and the desired conservation of the individual metered utility.

Further; the Public Service Commission failed to acknowledge that the Public Utilities Commission has and does take jurisdiction between end users, i.e. the public, and the metering and billing entity. **Tr0115 p.24** This gives equal protection under the Public Utilities Commission to those metered by PacifiCorp and those sub metered, yet the inhabitants of Broadway Lofts are discriminated

against by not having the same lower master-metered electrical rates that other inhabitants of multiple family dwellings possess. This is because these inhabitants live in a structure that is not considered to be a “new building”; or it has a central boiler and chiller system. Yet the inhabitants of the Broadway Lofts do not receive the same electrical rate, are master metered for gas (the same as central boiler/chiller) and meet the cost criteria under PURPA. This is clearly unreasonable discrimination.

CONCLUSION

The PSC improperly applied the law R746-210 or “PURPA” to the J.G. McDonald Chocolate Company Building, now known as the Broadway Lofts (Lofts). Rule 746-210 or PURPA defines the time when construction begins on a new building as the time when the footings are poured. The footings for this building were poured in 1901. Salt Lake City Corporation Business Services and Licensing Division does not consider the Broadway Lofts Building a new building. PacifiCorp recognizes that it is not a new building. Therefore, since it is not a new building constructed after August 1, 1984, it is not subject to R746-210.

The PSC misapplied the law to this project in its failure to recognize the cost effective exception when applying the Administrative Rule 746-210, (“PURPA”). Each of the cost-benefit analysis prepared met the requirements of the PSC. PacifiCorp was required under R746-210-3-D to provide “lump sum

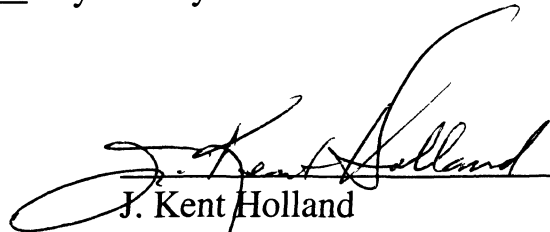
differential cost. This requirement of PacifiCorp was never fulfilled. PacifiCorp has no standing to object to the prepared Cost-benefit analysis prepared for Westside when PacifiCorp failed to provide its required information.

PacifiCorp, by its acceptance of the plans showing master metering/sub metering in February 1998, had waived any right to object to the master metering/sub metering of the Lofts. Westside relied on this acceptance to their detriment. PacifiCorp met the necessary elements for waiver. *Living Scriptures, Inc. v. Kudlik*, 890 P.2d 7 (Utah App. 1995)

PacifiCorp must provide electricity and services to the public without discrimination and on basis of reasonable cost. PacifiCorp is barred from treating persons similarly situated in a dissimilar fashion. *Mountain States Legal Foundation v. Utah Public Service Commission*, supra. Broadway Loft residents are being penalized because their building has been renovated. PacifiCorp may make reasonable classifications between consumers, but there must be adequate findings of fact, supported by evidence, which demonstrate a rational basis for the classification. This has not been done by PacifiCorp. See *Mountain States Legal Foundation v. Utah Public Service Commission*, supra. There are no adequate findings of fact to justify the discrimination between Broadway Loft residents and those residents similarly situated. Therefore Broadway Lofts have been unfairly discriminated against.

Therefore Broadway Lofts should be allowed to master meter/ sub meter.

DATED this 28th day of May 2001.


J. Kent Holland
Attorney for Complainant/Petitioner

CERTIFICATE OF SERVICE

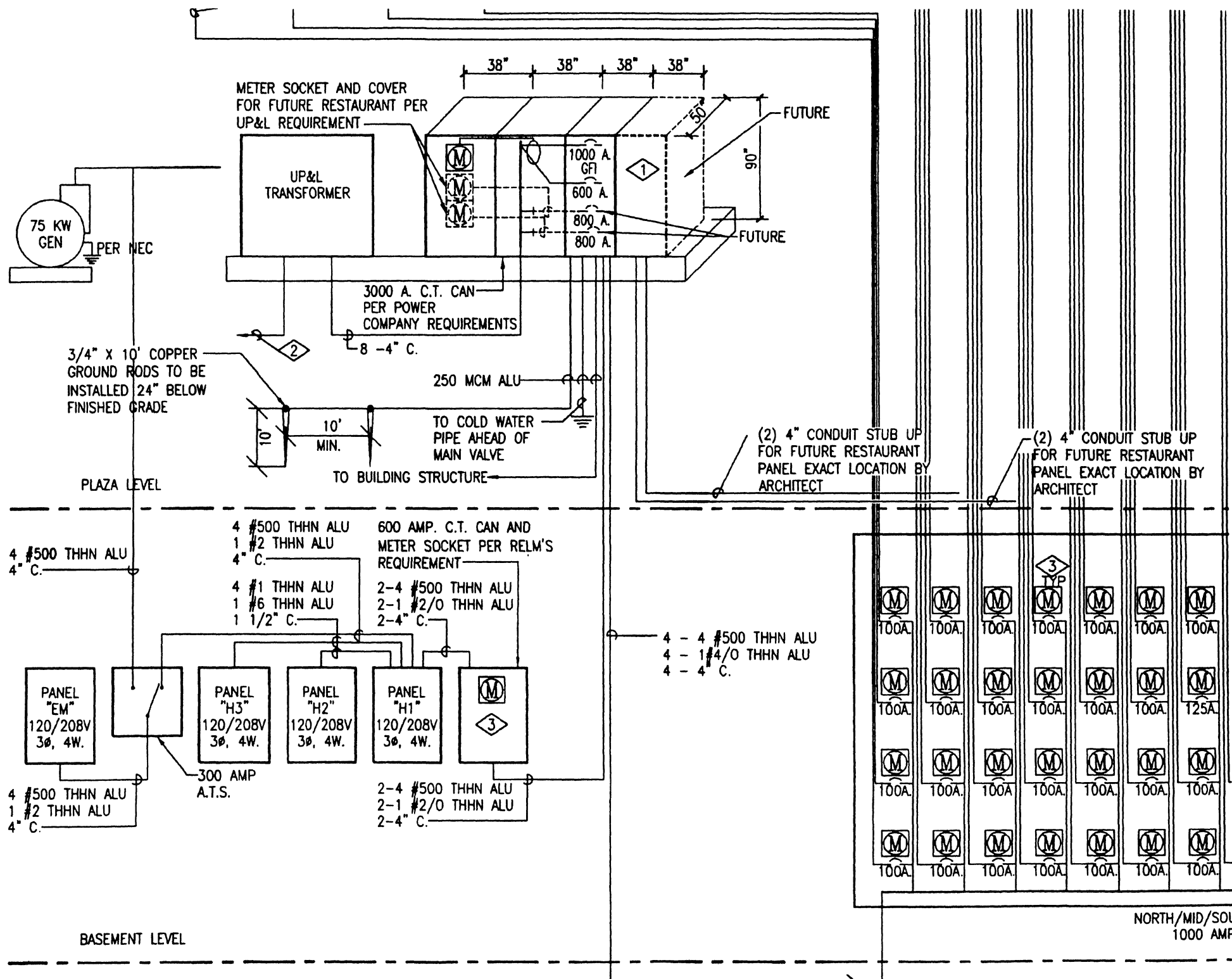
I hereby certify that a true and correct copy of the foregoing REPLY BRIEF
OF COMPLAINANT/PETITIONER, was hand delivered, this 29th day of May
2001, to the following:

Mark E. Hindley
STOEL RIVES LLP
201 South Main Street, Suite 1100
Salt Lake City, Utah 84111-4904

Sandy Mooy
UTAH PUBLIC SERVICE COMMISSION
Heber J. Wells Building
160 East 300 South
P.O. Box 45585
Salt Lake City, Utah 84145-0585



Tab 1



Tab 2



1407 West North Temple
P.O. Box 899
Salt Lake City, Utah 84110
(801) 535-4145

SHELLEY R. FAIGLE
Assistant Vice President - Rates

June 25, 1986

*Kent - here
it is - finally.
Regards, SRF*

Gene D. Blackwelder, Director
Auxiliary Services
University of Utah
1009 Annex Building
Salt Lake City, Utah 84112

Dear Gene:

Pursuant to our visit with you on Thursday, April 24, 1986, and at your request, we have reviewed the RELMS system of submetering as to their company's philosophy, system design and operating practices. We also took a tour of the working equipment being tested at the University Student Housing Complex. It is our opinion that the RELMS submetering and remote monitoring system is soundly thought out and well engineered.

We have no objections on technical grounds for RELMS to provide energy monitoring and billing services to the University of Utah as long as such is in compliance with the Public Service Commission of Utah approved regulations.

I have enclosed herewith, for your information, a copy of Utah Power & Light Company's Electric Service Regulation No. 4 entitled, "Supply and Use of Service". This regulation under Paragraph 2, **Customers Use of Service**, details the approved Public Service Commission's policy for electric service power cost allocation as a result of submetering. Please note that pursuant to this paragraph, "Such allocation is to be made on an equitable basis and no cost will be added to the total amount billed to the master meter".

I appreciated very much the opportunity to meet with you and discuss your concerns. Please feel free to call me if you have any further questions on this matter.

Sincerely,

Shelley R Faigle

SRF/mlb

Enclosure