

SECRETARY'S RECORD, NEBRASKA PUBLIC SERVICE COMMISSION

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

| | | |
|----------------------------------|---|--------------------------|
| In the Matter of Safe Knights, |) | APPLICATION NO. B-1789 |
| Inc., Omaha, seeking authority |) | |
| as a common carrier in Nebraska |) | |
| intrastate commerce in the |) | |
| transportation of passengers by |) | |
| bus, van, and SUV/Truck for |) | |
| impaired passengers and further |) | |
| will provide a service to drive |) | |
| their car home between points in |) | GRANTED AS MODIFIED |
| Douglas, Sarpy, Washington, Cass |) | |
| & Lancaster counties, on the one |) | |
| hand, and, on the other hand, |) | |
| points in Nebraska over |) | |
| irregular routes. RESTRICTION: |) | |
| The transportation of railroad |) | |
| train crews and their baggage is |) | ENTERED: JANUARY 4, 2012 |
| not authorized. HHS Designation: |) | |
| No. |) | |

APPEARANCES

For the Applicant:

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For the Commission Staff:

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For the Protestants

Happy Cab d/b/a Happy Cab Co.,
Yellow Cab, Checker Cab
Company and DonMark, Inc.,
d/b/a Cornhusker Cab Company:

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1201 Lincoln Mall, Suite 102
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BY THE COMMISSION:

BACKGROUND

By application published on March 4, 2011, Safe Knights Inc., ("SK") of Omaha, Nebraska, seeks authority from the Public Service Commission ("PSC" or "Commission") to operate as a

common carrier of passengers and their baggage in open class service between points in Douglas, Sarpy, Washington, Cass and Lancaster counties, and further will provide a service to drive their car home. Notice of the application was published in The Daily Record, Omaha, Nebraska on September 8, 2008. Timely protests to the application were filed by Happy Cab d/b/a Happy Cab Co., Yellow Cab, Checker Cab Company and DonMark, Inc., d/b/a Cornhusker Cab Company (collectively, as "Cab Company" or the "Cab Companies").

A hearing on the application was held on August 31, 2011, with appearances as listed above. Notice of the hearing was sent to all parties of record on August 15, 2011.

APPLICANT'S EVIDENCE

Mr. Rick Van Moorlegghem testified for the Applicant. Mr. Van Moorlegghem is the President of the Applicant. He is planning on having a major role in the operation of the Applicant if it were to receive authority from the Commission. The proposed hours of operation of Safe Knights are later at night and will not interfere with his daytime employment. The proposed hours of operation are 8 p.m. to 3 a.m. Thursday, Friday, and Saturday due primarily to the fact that the Applicant proposes to serve impaired customers.

The Applicant plans to operate on grants and operating revenue. It has currently received a \$20,000 grant from the Sherwood Foundation, and has applied for several other grants in the Iowa and Nebraska area. They have also received donations from Facebook Causes and Network for Good.

The Applicant then reviewed its anticipated expenses. It has expenses for volunteers, office supplies, insurance, maintenance, website costs and other costs. The automobile insurance quote was for \$1 million of coverage.

The Applicant plans to have drivers that are both volunteer and employees. The initial plan is to start with two or three driver teams at night and then increase that number to 15 to 20 if the market for the service develops. An initial job posting on Craigs List brought in 15 applicants. All applicants will be screened for physical impairments, DMV records, and drug screening.

The Applicant will use two types of drivers. One will drive the customer's vehicle home for them with the chase driver following behind to take the other driver to the next location. There will also be dispatchers to inform the drivers where to go next. The employees will be paid on a lump sum basis plus any tips that they may receive.

The drivers will be routed through a dispatch system that uses GPS technology to set out the best route to follow. The system will track mileage as well as provide additional features such as a panic button that will alert the dispatcher of a problem.

The Applicant will use volunteer drivers as chase vehicles to bring the employee drivers either back to the starting place or to the next trip. These volunteers will use their own vehicle in the operation. If there are problems with their driving record they will be employed in other areas of the operations such as dispatch or paperwork processing. Many of the volunteers will be Community Service Persons who need to perform community service work as part of a court sentencing regiment. The Applicant will not use any felony or violent offenders in any capacity. The Applicant has already contacted the United Way as a conduit for the use of volunteers. These volunteers will be screened in a similar manner to the regular employee drivers.

The driver teams will be trained to look for basic factors as to the safety of the client's car that they are transporting. They will be instructed to look for tire wear, no leaks from systems such as brakes, turn signals, strong brakes and other factors. The drivers fill out a checklist that requires them to go through many of these factors. If the vehicle is deemed to be unsafe, the trip will not be performed and the client will be referred to a taxi to be taken home.

The Applicant proposes to charge a \$15 pick-up fee and \$2.00 per mile as measured by the GPS system. If the client cannot pay then the trip is still performed but payment can be made later. If the client does not have a car to return, the client is referred to the taxi companies.

Commissioner Landis questioned Mr. Van Moorlegham about the legal effect of entering into a contract or receiving information regarding insurance or the condition of the car from a person who is impaired. Mr. Van Moorlegham replied that the

check list for the safety of the car is done by Safe Knights without having to get the information from the client, and that they will follow up to receive a sober consent the next day. While the next-day consent may not have any legal effect, Mr. Van Moorlegham said that "it is better than nothing."

Commissioner Boyle inquired as to the number of bars that may be interested in becoming a sponsor for the Applicant's services and what benefits that the bar may receive for becoming a sponsor. Mr. Van Moorlegham said that the bars will receive advertising promotion as well as community acknowledgement that they are working to prevent drunk driving. The bars would also get a discounted rate for their patrons.

On further questioning from Commissioner Boyle, Mr. Van Moorlegham said that the service will be primarily a dispatch system and that the service will not be chasing down rides in the downtown area late at night as the cab companies currently do. Commissioner Boyle stated that she understood that the service would be a dispatch service only and may not be supportive of the application if the Applicant would drive on the street looking for customers as the taxis currently do.

On cross-examination by Mr. Pollock, Mr. Van Moorlegham said that the Applicant will have a safety checklist for the driver to review to help ensure the safety of the vehicle being driven in the service. They also will review with the client the Right to Terminate the service if the client were to become a danger to the driver. Mr. Pollock noted that there is not a provision in the checklist to check the registration of the vehicle.

Further cross-examination discussed budget items such as reimbursement of volunteers for gasoline, food for the volunteers and drivers, a box of supplies for each team, and other miscellaneous expenses. The Applicant is still in the process of determining whether or not it may have to use employees rather than independent contractors, but believes that it has the ability to deal with the situation either way.

Jason Hemberger was called out of order by agreement of the parties as a witness for the Protestants. Mr. Hemberger is the owner of two establishments in Omaha that he described as lounge bars. He stated that he is familiar with the Omaha taxi companies and has used them weekly to take home patrons of his establishments. The Omaha cab companies have helped his

clientele with returning to get their vehicles the next day, but have not done it in the manner proposed by the Applicant. Mr. Himberger stated upon examination that he was satisfied in general with the cab companies and that they were currently filling all of his needs.

On cross-examination by Mr. Alexander, Mr. Himberger did state that there was only one driver in the cab and that he had never seen a taxi with two drivers.

Mr. Van Moorlegham was recalled. Upon cross-examination by Mr. Pollock, Mr. Van Moorlegham stated that drivers would be 25 or older, and that background checks and DMV searches would be done on all drivers, as well as physical exams performed on the independent contractors or employees of the Applicant.

The patrons will sign a consent form at the beginning of the trip, unless they are not able to due to the state of their impairment. A sober consent from will be signed later if necessary.

The Applicants expenses and revenues were examined. Mr. Van Moorlegham said that SK will receive income from memberships, volunteer donations, grants, other donations and trip revenue. They will have various expenses such as insurance, clothing for the drivers, food expenses, screening and office and dispatch expenses.

Mr. Van Moorlegham anticipates that the service will be able to recruit 25 bars over the first two years as sponsors, and upwards of 500 individuals as members. He expects that the service will ultimately provide approximately 500 trips per month.

Mr. Van Moorlegham did not have any specific information on how many people would use the proposed service because they would not leave their car behind, nor any surveys regarding these statistics. He did cite that focus groups that he has worked with consisting of individuals and bar owners have indicated that this is an issue that needs to be addressed.

Mr. Pollock reviewed with Mr. Van Moorlegham rules of the Commission that they would be expected to comply with. Mr. Van Moorlegham stated that he was aware of plate fees that could be paid by the number of teams that are developed; display identification signage that would be complied with by magnetic

door displays; photo identification cards that would be displayed; and that the safety of the cars would be addressed by the training of the drivers that the Applicant will undertake as well as the following of the checklist to try to ensure that the cars are road worthy.

On examination by Commissioner Schram, Mr. Van Moorlegham stated that if there was more than one person that needed to be taken home then those people would be dropped off first and there would be one charge to the owner of the car at the end of the trip.

On examination by Commission staff, Mr. Van Moorlegham stated that the Applicant will acquire a \$1.5 million policy in compliance with Commission rules. He also stated that it was his understanding that the volunteers would be considered as those of Meals on Wheels volunteers who are not compensated and therefore are not seen as being "for-hire". SK's insurance company INSPRO does have programs that are available to these drivers if they wish to be further protected.

On examination by Commissioner Boyle, Mr. Van Moorlegham said that his drivers will be supplied with a Samsung mobile device. This device is designed to help with GPS directions as well as determining the mileage of the trip.

The Applicant anticipates that it will use many different types of vehicles in supplying its services, but will limit to smaller vehicles and not busses. The Applicant specifically requested that its application be modified to exclude buses.

Mr. Michael Rhyne of Safe Ride America was called next by the Applicant. Mr. Rhyne is the Executive Director of Safe Ride, which is a Georgia non-profit company. He oversees all operations of Safe Ride including donations, partnerships and staffing. The service provides a service similar to that of the Applicant.

Mr. Rhyne stated that they provide some free service, the team concept of transporting impaired people as well as drivers by the hour. He said that they use many volunteers from Craigslist, corporate employees, colleges and Community Service people. They also use independent contractor drivers as well. They only provide service for impaired people who do have cars. The employee drivers drive the client car, and the volunteer

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follows in the chase vehicle. They do screen their drivers similarly to the Applicant.

Mr. Rhyne stated that they do charge and have to use independent contractors as they could not provide adequate service with only volunteers. They also have a pay-later policy that allows the service to be provided with no up front charge but be paid at a later time by the client. Their rate for Safe Ride is \$15 for the pick-up plus three dollars per mile. They currently provide 200 to 300 trips per week with 50 to 70 volunteers. There is no additional charge for additional passengers.

Mr. Rhyne stated that there are over 400 similar organizations currently operating in the country. Some use the folding scooter method in which the driver folds a scooter in the trunk and uses it to return home after the trip. Mr. Rhyne said they do not use that method as he deems it too dangerous to use.

On cross-examination by Mr. Pollock, Mr. Rhyne stated that Safe Ride may contribute a dispatch system to the Applicant. He also noted that the passengers that ride along with the impaired individual could be taxi customers, but Mr. Rhyne noted that most of the time the individuals that ride along were driven by the impaired individual and therefore did have some sort of a relationship.

On examination by Commissioner Schram, Mr. Rhyne noted that his company was not regulated by any regulatory authority. He had contacted the Georgia Public Service Commission, who informed him that his service was not regulated by that body. The City of Atlanta did consult with him regarding possible regulation, but were ultimately informed that they were not subject to them, either.

PROTESTANTS EVIDENCE

The first witness called by the protestant cab companies was John Davis. Mr. Davis is the Director of Operations for the protestant cab companies. He has held that position for over five years. He is responsible for the day-to-day operations of the companies. He is involved with driver and employment issues, staffing, maintenance of vehicles, oversight of managers of the companies, lobbying and other duties. The companies

employ independent contractors for drivers and employ 35 other support staff.

The companies supply transportation for various entities. They provide transportation for the general public as well as for school systems, local bus providers, health and Human Services providers, and residential and commercial transportation.

Mr. Davis oversees safety issues for the companies. The companies hold safety meetings for their drivers that cover subjects such as safe operation of the vehicles, sensitivity training, defensive driving training as well as dealing with issues with late-night transportation. The companies also do their own inspections of their fleet of vehicles.

The companies provide self-insurance up to \$25,000 per incident. They also have insurance coverage above this amount to deal with catastrophic claims.

Mr. Davis stated that there have been no instances to his knowledge of refusal of service by the companies.

Mr. Davis testified that there has been an increase in competition over the past few years, primarily from party buses that operate on Friday and Saturday nights. He stated that calls to the companies have decreased twenty-five percent over the past five years, and that an hourly service that they provide has almost been totally abandoned by its customers.

Mr. Davis further said that the companies would be hurt by the Applicant's targeting of late night Friday and Saturday night business. This time period is a large part of the business of the companies, and a diversion of this business would have a substantial negative impact on their business.

The companies have provided specialized service in areas of high traffic on Friday and Saturday nights. They have put up a cab stand in the Old Market as well as at 114th and Dodge Street in an effort to better meet the demand for service in these areas. Mr. Davis estimates that the companies receive between 150 and 300 calls per hour between 9 p.m. and 3 a.m. on Friday and Saturday nights. The Little Kings in the Old Market has also become an unofficial cabstand late at night.

The companies also have met with various bars to increase awareness of their services as well as provide advertising materials and the phone number so that the patrons will be aware that the service is provided.

Mr. Davis said that the companies do often take people to their vehicles the next day after taking a cab home the night previously. Usually this service does not operate by taking the person and the car home together, but they have not recorded a time where a person refused to take a cab home because he was not also able to take his car home at the same time. Mr. Davis detailed how late-night transportation presents a higher risk to the driver and the companies. There is an increased risk of assaultive behavior, passengers trying to jump out of a moving car, the passenger passing out in the car or getting sick in the vehicle. The companies have devised a set of alert codes for the dispatchers to use in the case of dangerous behavior so that law enforcement can be called if necessary.

The companies have considered taking along volunteers but have decided not to do so. Mr. Davis cited liability and insurance issues as well as the safety of the customer's car and other issues such as allegations of theft by the passenger.

Mr. Davis stated that he did not believe that the proposed service was necessary. The companies he manages have many vehicles, a short wait time, and round the clock service. These factors all weigh against the granting of the authority, according to Mr. Davis.

On cross-examination by Mr. Alexander, Mr. Davis stated that the companies had no plan to use volunteers such as Safe Knights was proposing, and that they have never offered such a service. He further stated that he did not know if anyone had refused to ride with them because of the car situation, but further stated that they do document the reasons for refusal of service and that this excuse had not been given as a reason for a refusal of service.

Mr. Davis also said that the Safe Rider programs that the companies were involved with were targeted for specific time periods such as December, New Year's Day and St. Patrick's Day. There were also a few other special events, but the Safe Ride programs were not of long lasting duration but only during these special time periods.

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Mr. Steve Mason was called next by the protestant cab companies. Mr. Mason is an agent with Forsyth Insurance and has been there for twenty-four years. He has been involved in commercial transportation insurance for taxicabs, bus transportation and limousines.

Mr. Mason reviewed the Applicant's budget assumptions and their profit and loss summary. This included their information regarding insurance coverage. Mr. Mason stated that the \$1,000,000 insurance level that they have information on is inadequate for Public Service Commission requirements and that they need \$1.5 million in coverage.

Mr. Mason stated that there may be issues involving insurance coverage. In many instances the coverage that is proposed to be held by the Applicant would only apply to third parties and may not apply to the driver, the patron or the volunteer. The patron's insurance may also be involved as the primary insurance if an accident was involved, with the insurance proposed by the Applicant only covering if the patron's insurance did not cover all the damages. Mr. Mason further noted that workers compensation does not usually apply to volunteers. He also noted that the patron may present an insurance card to the Applicant that reflects coverage when there is not in place.

Mr. Mason also noted that the volunteers coverage may be excluded if he or she is determined to be involved in a livery situation, and that the B-2 line regarding medical coverage payments for smaller injuries may also be not effective. Mr. Mason also noted that the insurance plan presented by the Applicant did not provide for general insurance coverage for incidents that may happen that are not related to driving such as theft of assault.

On cross-examination by Mr. Alexander, Mr. Mason stated that B-2 does not require permission, only that it covered any person using the covered automobile.

Mr. Mason also stated that the livery part of the transportation could be an issue. An insurance company could view the transportation of the customer's vehicle as involved with livery or could see that it is not.

Mr. Mason also stated that Nebraska follows the federal requirement of \$1.5 million in insurance for an open class provider such as Safe Knight would be.

On redirect by Mr. Pollock, Mr. Mason did state that an insurance carrier could dispute coverage if the driver had not given permission to operate the vehicle and that the condition of the patron may affect his or her ability to grant permission legally.

Mr. Bill Alford testified on the behalf of his limousine companies. Mr. Alford is the owner of VIP Limousine, a protestant in this matter. He stated that the proposed service of the Applicant will have a negative effect on his business. He said that he has offered a similar service by offering to drive their vehicles for them with a second person. He said that there had been no takers for this service. Mr. Alford noted that much of his business is tied to bar runs and after hours service.

On cross-examination by Mr. Alexander, Mr. Alford did state that the charge for the service he described would include a \$25 fee for the driver if the trip was under an hour, as well as the charge for the limousine or other vehicle that is contracted for.

OPINION AND FINDINGS

In this particular case, Applicant is seeking to obtain authority so that it may provide transportation for passengers that are impaired and also provide a service that will transport that passenger's vehicle home. The counties that the Applicant seeks to operate in are Douglas, Sarpy, Washington, Cass and Lancaster

Applications for common carrier authority are governed by Neb. Rev. Stat. § 75-311 (2010), which provides,

A certificate shall be issued to any qualified applicant authorizing the whole or any part of the operations covered by the application if it is found after notice and hearing that (a) the applicant is fit, willing, and able properly to perform the service proposed . . . and (b) the proposed service is to the extent to be authorized by

the certificate, whether regular, or irregular, passenger or household goods, is or will be required by the present or future public convenience and necessity. Otherwise the application shall be denied.

In other words, the Commission must apply a two-part test. First part of the test is that the Commission must determine if an applicant is "fit, willing and able to perform the service proposed." The second part of the test is that the proposed service "is or will be required by the present or future public convenience and necessity."

In order to be successful, an applicant must provide that it is fit, willing and able to provide the proposed service. From the evidence presented, the Commission finds that the Applicant has sufficiently proven it is fit, willing and able to properly perform the proposed service and able to conform to Neb. Rev. Stat. § 75-301 et seq. Applicant presented a business plan that was detailed and shows an adequate ability to operate and generate sufficient funds to enable continued operations. The Applicant appears to have the necessary business acumen and dedication to operate the business. The Applicant stated that it had arranged for sufficient funding that it will be able to start operations upon the granting of the authority. There was nothing presented by the Protestants that would cause the Commission to find that there was an issue in the Applicant's President's background that would cause it to find that he was personally unfit to operate the business. Based on the evidence before us and adduced from the record in the instant case, we find that the applicant has met the fitness test of Neb. Rev. Stat. Section 75-311.

We therefore turn to the issue of whether the proposed service is or will be required by the present or future public convenience and necessity. The traditional analysis for determining "need and necessity" was set forth by the Supreme Court in its May 8, 1998, ruling,

In determining public convenience and necessity, the deciding factors are (1) whether the operation will serve a useful purpose responsive to a public demand or need, (2) whether this purpose can or will be served as well by existing carriers, and (3) whether it can be served by the applicant in a specified manner without endangering or impairing the

operations of existing carriers contrary to the public interest.

In re Application of Nebraskaland Leasing & Assocs., 254 Neb. 583, 591 (1998).

The issue of whether an applicant has met its burden of demonstrating that the proposed service is consistent with public convenience and necessity is ordinarily a factual issue. Id.

Given the record before us, we find that the applicant has demonstrated a sufficient level of need and necessity to support a grant of the application. Exhibit 4 is a document that offers traffic records for Douglas County and statewide. In 2010, the most recent year for which said numbers are available, Douglas County had 4,146 arrests for Driving Under the Influence (DUI). The number statewide was 12,399. DUI convictions numbered 3,591 in Douglas County and 10,646 statewide. This is an issue that presents a problem all across the state of Nebraska. While the numbers have receded slightly from 2009, the statistic is still significant and requires that it be addressed. The service proposed to be offered by the Applicant is pointed directly at helping to alleviate and reduce these numbers.

The Protestants have made efforts to try to address these issues, but the problems are beyond their ability to wholly correct the situation. Any resources that are responsible and able to properly address this issue need to be employed.

The Commission finds that the above evidence shows that there is a useful purpose responsive to a public demand or need that the proposed operation can help to meet. The evidence also shows that the existing companies are not currently meeting that need.

The second part of the test is whether this purpose can or will be served as well by the existing carriers. The evidence presented shows that the Protestant cab companies stated that part of the services that they provide is to return the inebriated person to his vehicle the next day, and that they perform this service quite often. However, the Protestant cab companies do not appear to routinely perform the service proposed to be provided by the Applicant. Mr. Himburger stated that he had seen the cab companies perform the next day return service, but did not recall seeing more than one driver in a cab

that would have allowed for the performance of the service proposed. Mr. Davis said that the cab companies had looked at using volunteers, but that for many reasons had decided not to do so. Mr. Alford also stated that he offered a similar service, but it is in conjunction with his limousine operations and is not the stand alone service proposed by the Applicant. It therefore appears from the record that the Protestants have not shown that they either can or will provide the service as well as that proposed to be offered by the Applicant.

We now turn to the issue of whether the public demand or need can be served by the Applicant in a specified manner without endangering or impairing the operations of existing carriers contrary to the public interest. Mr. Davis stated that the proposed operation would hurt the Protestant cab companies if the Applicant were to target its Friday and Saturday night business. He stated that diversion of business would have a substantial and negative effect on the companies.

However, the Commission finds that the service provided will be sufficiently different from that of the Protestants that it can be operated without endangering or impairing the operations of existing carriers contrary to the public interest. The President of the Applicant stated that Safe Knights is ". . . not a taxi service." (Page 24) He stated that "[W]e won't be chasing down rides in that capacity." (Page 32) The Commission further notes that the information submitted in Exhibit 4 shows that there is an extensive issue with drunk driving in the State of Nebraska. The number of drunk drivers can and must be reduced on the roads of the state. The public interest calls for further steps to be taken to reduce these problems.

The granting of this application will provide another avenue for those members of the general public who find themselves inebriated to get home safely while removing a danger to themselves and others by using this service. This overriding need in the public interest mandates that the application be granted.

From the evidence adduced and being fully informed in the premises, the Commission is of the opinion and finds:

1. The applicant is fit willing and able properly to perform the service proposed and to conform with the provisions

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of Neb. Rev. Stat. § 78-301 to 75-322 and the requirements, rules and regulations of the Commission thereunder.

2. The proposed intrastate service is or will be required by the present or future Public Convenience and Necessity to the following extent:

C E R T I F I C A T E A U T H O R I Z E D

SERVICE AND TERRITORY AUTHORIZED: Transportation of passengers by van, sedan and SUV/Truck for impaired passengers and further will provide a service to drive their car home between points in Douglas, Sarpy, Washington, Cass & Lancaster counties, on the one hand, and, on the other hand, points in Nebraska over irregular routes. **Vehicles:** Van, sedan, and SUV/Truck. RESTRICTION: The transportation of railroad train crews and their baggage is not authorized. HHS Designation: No.

3. The application should be granted.

ORDER

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that Application B-1789, be, and it is hereby, granted; and that upon compliance with the terms and conditions as set forth in this Order, a Certificate of Public Convenience and Necessity shall be issued to Safe Knights, Inc., Omaha, Nebraska, authorizing the operations as set forth in the foregoing findings.

IT IS FURTHER ORDERED that the applicant shall not be issued the Certificate of Public Convenience and Necessity authorized by the Commission unless and until applicant has fully complied, within a reasonable time from the effective date of this Order, with Neb. Rev. Stat. §75-305 (fees), 75-307 (insurance), and 75-308 (rates), and with the rules and regulations of the Commission; and if upon expiration of such time applicant has not complied with such terms and conditions, this Order shall, after reasonable notice to applicant, be of no further force and effect.

IT IS FURTHER ORDERED that applicant shall not conduct operations until a Certificate of Public Convenience and Necessity is issued.

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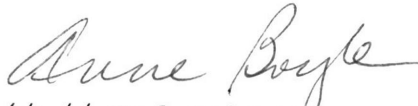
IT IS FURTHER ORDERED that applicant shall render reasonably continuous and adequate service to the public pursuant to the authority authorized.

IT IS FURTHER ORDERED that the Certificate of Public Convenience and Necessity authorized shall be subject to the terms, conditions, and limitations which have been, or may hereafter be, prescribed by the Commission.

MADE AND ENTERED at Lincoln, Nebraska, this 4th day of January, 2012.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:



//s// Rod Johnson
//s// Frank Landis
//s// Tim Schram
//s// Jerry Vap


Chairman

ATTEST:



Deputy Director