



January 27, 2020

VIA EDGAR

Kevin Dougherty, Attorney-Advisor
Loan Lauren Nguyen, Legal Branch Chief
U.S. Securities and Exchange Commission
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U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Energy & Transportation
January 27, 2020
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If you have any questions regarding these matters, please do not hesitate to contact the undersigned at (216)694-5504.

Sincerely,

/s/ James D. Graham

James D. Graham
Executive Vice President, Chief Legal Officer
& Secretary