



January 4, 2024

Electronically Filed

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, DC 20426

Subject: **Bad Creek Pumped Storage Project (P-2740-053)
Initial Study Report and Initial Study Report Meeting**

Dear Secretary Bose:

Duke Energy Carolinas, LLC (Duke Energy or Licensee) is the Licensee, owner, and operator of the 1,400-megawatt (MW) Bad Creek Pumped Storage Project (FERC Project No. 2740) (Project), located in Oconee County, South Carolina, approximately eight miles north of Salem. The Bad Creek Reservoir (or upper reservoir) was formed from the damming of Bad Creek and West Bad Creek and serves as the Project's upper reservoir. Lake Jocassee serves as the lower reservoir and is licensed separately as part of Duke Energy's Keowee-Toxaway Hydroelectric Project (FERC Project No. 2503).

The existing license for the Project was issued on August 1, 1977, under the terms of an Original License issued by the Federal Energy Regulatory Commission (FERC or Commission), and the current 50-year operating license for the Project expires on July 31, 2027. Accordingly, Duke Energy is pursuing a new license for the Project pursuant to the Commission's Integrated Licensing Process (ILP), as described at 18 Code of Federal Regulations (CFR) Part 5.

In accordance with 18 CFR §5.11, on December 5, 2022, Duke Energy filed the Revised Study Plan (RSP) describing the studies the Licensee is proposing to conduct in support of relicensing the Project. The Commission approved the RSP with modifications on January 4, 2023, in its Study Plan Determination (SPD).

Initial Study Report

As approved by the Commission in its SPD, Duke Energy is implementing the following six studies:

- Water Resources Study;
- Aquatic Resources Study;
- Visual Resources Study;
- Recreational Resources Study;

- Cultural Resources Study; and
- Environmental Justice Study.

During the 2023 field season, Duke Energy conducted studies in accordance with 18 CFR §5.15, as provided in the RSP and as subsequently modified by FERC's SPD. In accordance with 18 CFR §5.15, Duke Energy has provided the attached quarterly updates regarding study implementation and is hereby filing the Initial Study Report (ISR) with the Commission. The ISR describes the Licensee's overall progress in implementing the study plan and schedule, summarizes available data, and describes variances from the study plan and schedule approved by the Commission.

Duke Energy is filing the ISR with the Commission electronically and is distributing this letter to the parties listed on the attached distribution list. For parties listed on the attached distribution list who have provided an email address, Duke Energy is distributing this letter via email; otherwise, Duke Energy is distributing this letter via U.S. mail. Parties interested in the relicensing process may obtain a copy of the ISR electronically through FERC's eLibrary system¹, or from Duke Energy's public relicensing website.² If any party would like to request a CD containing a copy of the ISR, please contact the undersigned at the address listed below. Note that Critical Unclassified Information (CUI) pertaining to locations of protected archeological sites is being filed separately.

ISR Meeting

The Commission's regulations at 18 CFR §5.15(c) require Duke Energy to hold a meeting with relicensing participants and FERC staff within 15 days of filing the ISR. Accordingly, Duke Energy will hold an ISR Meeting from 9:00 AM to 5:00 PM (approximately) on Wednesday, January 17, 2024, at its Wenwood Operations Center in Greenville, SC. An agenda for the ISR Meeting is provided in Attachment 3. Participants are free to join the meeting in its entirety or in part based on interests or availability, but please note the agenda is intended as an approximation and more or less time may be spent on individual studies, as needed.

Duke Energy encourages in-person participation by stakeholders and Commission staff, but can provide a Microsoft Teams option for participants where needed. Stakeholders who are interested in participating via web meeting should contact John Crutchfield (john.crutchfield@duke-energy.com) by January 11, 2024, to request such accommodation.

Duke Energy respectfully requests that the stakeholders who will attend the meeting contact John Crutchfield (contact information provided above) before close of business on Thursday, January 11, 2024. Lunch will be provided for meeting attendees who register their attendance by that date.

Duke Energy looks forward to continuing to work with Commission staff, resource agencies, Indian Tribes, local governments, non-governmental organizations, and interested members of

¹ <https://elibrary.ferc.gov/idmws/search/fercgensearch.asp> under docket number P-2740-053

² <https://badcreekpumpedstorage.com>

Bad Creek Pumped Storage Project (P-2740)
Initial Study Report and Initial Study Report Meeting

the public throughout the relicensing process. If there are questions regarding this filing, please contact me at Alan.Stuart@duke-energy.com or via phone at 980-373-2079.

Sincerely,

A handwritten signature in blue ink that reads "Alan Stuart". The signature is written in a cursive style with a large initial "A" and "S".

Alan Stuart
Senior Project Manager
Water Strategy, Hydro Licensing & Lake Services
Duke Energy Carolinas, LLC

Enclosures

cc (w/enclosures): Jeff Lineberger, Duke Energy
 Garry Rice, Duke Energy

Bad Creek Pumped Storage Project (FERC No. 2740) Distribution List

Federal Agency

Advisory Council on Historic Preservation
401 F St N.W.
Ste 308
Washington, D.C. 20001-2637

Bonneville Power Administration, Pacific NW
Hydrosite Database & Analysis Section
905 N.E. 11th Ave
Ste 7
Portland, OR 97232-4169

Director of Outreach and Assistance
Federal Energy Regulatory Commission
Office of Public Participation
888 First St, N.E.
Washington, D.C. 20426
Rachel.McNamara@ferc.gov

Federal Energy Regulatory Commission, Atlanta
Regional Office, Gwinnett Commerce Center
3700 Crestwood Pkwy, N.W.
Ste 950
Duluth, GA 30096-7155

Federal Energy Regulatory Commission
Office of Energy Projects
888 First St, N.E.
Room 61-02
Washington, D.C. 20426

Federal Energy Regulatory Commission, Office
of General Council - Energy
888 First St, N.E.
Room 101-56
Washington, D.C. 20426

Jeffrey Duncan
National Park Service
535 Chestnut St
Ste 207
Chattanooga, TN 37402-4930
jeff_duncan@nps.gov

National Park Service
100 Alabama St S.W.
Ste 1924
Atlanta, GA 30303

Fritz Rohde
NOAA – National Marine Fisheries Service
Habitat Conservation Division
101 Pivers Island Rd
Beaufort, NC 28518-9722
Fritz.rohde@noaa.gov

David Bernhart
NOAA – National Marine Fisheries Service
Southeast Region
263 13th Ave S.
St. Petersburg, FL 33701-5505
david.bernhart@noaa.gov

Southeastern Power Administration
1166 Athens Tech Rd
Elberton, GA 30635-6711

Harold Peterson
National Hydropower Program Coordinator
U.S Bureau of Indian Affairs
609 Demoines Dr
Hermitage, TN 37076
harold.peterson@bia.gov

Leonard Rawlings
U.S Bureau of Indian Affairs,
Eastern Regional Office
545 Marriott Dr
Ste 700
Nashville, TN 37214
Leonard.Rawlings@bia.gov

U.S Bureau of Indian Affairs,
Office of the Solicitor
1849 C St N.W.
MS6557
Washington, D.C. 20240

Lisa Hreha
U.S. Army Corps of Engineers
1835 Assembly St
Room 8658-1
Columbia, SC 29201
lisa.l.hreha@usace.army.mil

Howard Mindel
U.S. Army Corps of Engineers
60 Forsyth St, S.W.
Room IOM-15
Atlanta, GA 30303-8801
howard.p.mindel@usace.army.mil

U.S. Army Corps of Engineers
69A Hagood Ave
Charleston, SC 29403-0919

Kristin Andrade
U.S. Army Corps of Engineers, Greenville Office
Project Number SAC 2022-00413
SAC.RD.Greenville@usace.army.mil

Bad Creek Pumped Storage Project (FERC No. 2740) Distribution List

U.S. Army Corps of Engineers,
Office of the Chief of Engineers
20 Massachusetts Ave N.W.
Washington, D.C. 20314-0001

William Bailey
U.S. Army Corps of Engineers,
Savannah District
100 W. Olgethorpe Ave
Savannah, GA 31401-3640
william.g.bailey@usace.army.mil

Marvin Griffin
U.S. Army Corps of Engineers,
Savannah District
100 W. Olgethorpe Ave
Savannah, GA 31401-3640
marvin.l.griffin@usace.army.mil

U.S. Army Corps of Engineers,
Water Management
60 Darlington Ave
Wilmington, NC 28403-1343

Bob Dach
U.S. Bureau of Indian Affairs,
Natural Resources
911 N.E. 11th Ave
Portland, OR 97232-4169
robert.dach@bia.gov

U.S. Bureau of Land Management
273 Market Street
Flowood, MS 39232
BLM_ES_SSDO_Comments@blm.gov

U.S. Department of Agriculture,
Office of Chief Economist-OEPNUE
1400 Independence Ave N.W.
MS 3815
Washington, D.C. 20250-0001

U.S. Department of Interior
75 Spring St S.W.
Ste 304
Atlanta, GA 30303

U.S. Department of Interior, Office of
Environmental Policy & Compliance
1849 C St N.W.
MS 2430
Washington, D.C. 20240

U.S. Environmental Protection Agency,
Region IV
61 Forsyth St S.W.
Atlanta, GA 30303-8931

Chief of the NEPA Program Office
U.S. Environmental Protection Agency,
Region IV
kajumba.ntale@epa.gov

Melanie Olds
FERC Coordinator
U.S. Fish and Wildlife Service,
SC Ecological Services Field Office
176 Croghan Spur Rd
Ste 200
Charleston, SC 29407-7558
melanie_old@fws.gov

U.S. Fish and Wildlife Service
187S Century Blvd N.E.
Ste 400
Atlanta, GA 30345

U.S. Fish and Wildlife Service
1849 C St N.W.
Room 3238
Washington, D.C. 20240

Jen Barnhart
U.S. Forest Service, Sumter National Forest
112 Andrew Pickens Cir
Mountain Rest, SC 29664
jenniferjbarnhart@fs.fed.us

Derrick Miller
Special Uses Program Manager
U.S. Forest Service, Sumter National Forest
112 Andrew Pickens Cir
Mountain Rest, SC 29664
Derrick.Miller@usda.gov

U.S. Forest Service, Nantahala National Forest
160A Zillico St
Asheville, NC 28802

U.S. Forest Service, Southern Region
5645 Riggins Mill Rd
Dry Branch, GA 31020

Office of William Timmons
U.S. House of Representatives (CD4)
1237 Longworth House Office Building
Washington, D.C. 20515

Office of James E. Clyburn
U.S. House of Representatives (CD6)
2135 Rayburn House Office Building
Washington, D.C. 20515

Bad Creek Pumped Storage Project (FERC No. 2740) Distribution List

Office of Russell Fry
U.S. House of Representatives (CD7)
1626 Longworth House Office Building
Washington, D.C. 20515

Office of Ralph Norman
U.S. House of Representatives (CDS)
1004 Longworth House Office Building
Washington, D.C. 20515

Office of Joe Wilson
U.S. House of Representatives (CO2)
2229 Rayburn House Office Building
Washington, D.C. 20515

Office of Jeff Duncan
U.S. House of Representatives (CO2)
116 Cannon House Office Building
Washington, D.C. 20515

Matt Rimkunas
Office of Senator Burr
U.S. Senate
290 Russell Senate Office Building
Washington, D.C. 20510
matt_rimkunas@lgraham.senate.gov

Office of Senator Budd
U.S. Senate
217 Russell Senate Office Building
Washington, D.C. 20510

Office of Senator Scott
U.S. Senate
520 Hart Senate Office Building
Washington, D.C. 20510

Office of Senator Tillis
U.S. Senate
185 Dirksen Senate Office Building
Washington, D.C. 20510

U.S. Senator Lindsey Graham
U.S. Senate
2 W Washinton St
Ste 800
Greenville, SC 29601-4897

Van Cato
U.S. Senate, Upstate Regional Office
130 South Main St
Ste 700
Greenville, SC 29601
Van_Cato@lgraham.senate.gov

State Agency

North Carolina Department of Agriculture and
Consumer Services
Division of Soil and Water Conservation
1614 Mail Service Center
Raleigh, NC 27699-1614

Fred Tarver
North Carolina Department of Environmental
Quality, Division of Water Resources
1611 Mail Service Center
Raleigh, NC 29699-1611
fred.tarver@ncdenr.gov

North Carolina Department of Environmental
Quality, Division of Land Resources
1611 Mail Service Center
Raleigh, NC 27699-1611

North Carolina Department of Environmental
Quality, Environmental Management
Commission
1617 Mail Service Center
Raleigh, NC 29699-1617

North Carolina Department of Environmental
Quality, Office of the Secretary
1601 Mail Service Center
Raleigh, NC 27699-1601

Elizabeth Weese
North Carolina Department of Justice
114 West Edenton St
Raleigh, NC 27602
jweese@ncdoj.gov

Amin Davis
North Carolina Division of Parks and Recreation
1615 Mail Service Center
Raleigh, NC 27699-1615
amin.davis@ncdenr.gov

Mike Clampitt
North Carolina House of Representatives,
District 119
300 N. Salisbury Street
Room 633
Raleigh, NC 27603
Mike.Clampitt@ncleg.gov

North Carolina State Environmental Review
Clearinghouse
NC Department of Administration
116 West Jones St
Ste 5106
Raleigh, NC 27603

Bad Creek Pumped Storage Project (FERC No. 2740) Distribution List

Renee Gledhill-Earley
Environmental Review Coordinator
North Carolina State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617
renee.gledhill-earley@ncdcr.gov

Christine Farrell
Environmental Review Coordinator
North Carolina State Parks
christine.farrell@ncparks.gov

Brian Strong
North Carolina State Parks
brian.strong@ncparks.gov

North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building, 5th Floor
Raleigh, NC 27603-5918

Chris Wood
Hydropower Special Projects Coordinator
North Carolina Wildlife Resource Commission
645 Fish Hatchery Rd
Marion, NC 28752
chris.wood@ncwildlife.org

Office of the Attorney General of South Carolina
P.O. Box 11549
Rembert C. Dennis Office Building
Columbia, SC 29211-1549

Office of the Governor of North Carolina
20301 Mail Service Center
Raleigh, NC 27699-0301

Office of the Governor of South Carolina
1205 Pendleton St
Columbia, SC 29201

Public Service Commission of South Carolina
Office
101 Executive Center Drive
Suite 100
Columbia, SC 29210

Jeffrey Gordon
S. C. Office of Regulatory Staff
jgordon@ors.sc.gov

Findlay Salter
S. C. Office of Regulatory Staff
fsalter@ors.sc.gov

Elizabeth Johnson
Director
South Carolina Department of Archives and
History
8301 Parklane Rd
Columbia, SC 29223
EMJOHNSON@scdah.sc.gov

Morgan Amedee
South Carolina Department of Health and
Environmental Control
2600 Bull St
Columbia, SC 29201-1708
amedeemd@dhec.sc.gov

Charles Hightower
Water Quality Standards & Wetlands Section,
Manager
South Carolina Department of Health and
Environmental Control
2600 Bull St
Columbia, SC 29201-1708
hightoCW@dhec.sc.gov

Jennifer Hughes
South Carolina Department of Health and
Environmental Control
2600 Bull St
Columbia, SC 29201-1708
hughesjr@dhec.sc.gov

Shannon Bobertz
South Carolina Department of Natural
Resources
326 Little Brooke Lane
West Columbia, SC 29172
bobertzs@dnr.sc.gov

Elizabeth Miller
FERC Coordinator
South Carolina Department of Natural
Resources
P.O. Box 167
Columbia, SC 29202-0167
millere@dnr.sc.gov

Lorrienne Riggan
South Carolina Department of Natural
Resources
P.O. Box 167
Columbia, SC 29202-0167
rigginl@dnr.sc.gov

Bad Creek Pumped Storage Project (FERC No. 2740) Distribution List

Aiden Fell
South Carolina Department of Parks, Recreation
& Tourism
1205 Pendleton St
Columbia, SC 29211
afell@scprt.com

Rowdy Harris
South Carolina Department of Parks, Recreation
& Tourism
charris@scprt.com

Kelly Howell
South Carolina Department of Parks, Recreation
& Tourism
Khowell@scprt.com

Paul McCormack
Director
South Carolina Department of Parks, Recreation
& Tourism
1205 Pendleton St
Columbia, SC 29201
pmccormack@scprt.com

Jerry Carter
South Carolina House of Representatives
P.O. Box 11867
Room 418C
Columbia, SC 29211
Jerrycarter@schouse.gov

Neal Collins
South Carolina House of Representatives
P.O. Box 11867
Room 429
Columbia, SC 29211
nealcollins@schouse.gov

David Hiott
South Carolina House of Representatives
P.O. Box 11867
Room 4188
Columbia, SC 29211
davidhiott@schouse.gov

Bill Sandifer
South Carolina House of Representatives
P.O. Box 11867
Room 407
Columbia, SC 29211
billsandifer@schouse.gov

Anne Thayer
South Carolina House of Representatives
P.O. Box 11867
Room 306C
Columbia, SC 29211
Annethayer@schouse.gov

Bill Whitmire
South Carolina House of Representatives
P.O. Box 11867
Room 436C
Columbia, SC 29211
billwhitmire@schouse.gov

Thomas Alexander
South Carolina State Senate
P.O. Box 142
Room 313
Columbia, SC 29202-0142
thomasalexander@scsenate.gov

Rex Rice
South Carolina State Senate
P.O. Box 142
Room 101
Columbia, SC 29202-0142
rexrice@scsenate.gov

Nanette Edwards
Executive Director
State of South Carolina, Office of Regulatory
Staff
1401 Main Street
Suite 900
Columbia, SC 29201

Local Government

Scott Willett
Anderson Regional Joint Water System
swillett@arjwater.com

Maureen Copelof
Mayor
City of Brevard, NC
95 W. Main St
Brevard, NC 28712
maureen.copelof@cityofbrevard.com

J.C. Cook
City of Clemson, SC
1250 Tiger Blvd
Ste 1
Clemson, SC 29631
Mayor@cityofclemson.org

Bad Creek Pumped Storage Project (FERC No. 2740) Distribution List

Fletcher Perry
Mayor
City of Pickens, SC
219 Pendleton Street
P.O. Box 217
Pickens, SC 29671
fperry@pickenscity.com

Daniel Alexander
City of Seneca, SC
P.O. Box 4773
Seneca, SC 29679
dalexander@seneca.sc.us

Bob Faires
City of Seneca, Seneca Light & Water
P.O. Box 4773
Seneca, SC 29676

Danny Edwards
City of Walhalla, SC
P.O. Box 1099
Walhalla, SC 29691
dannyedwards@bellsouth.net

Jeff Boss
Greenville Water
P.O. Box 687
Greenville, SC 29602
jboss@greenvillewater.com

Jennifer Adams
Clerk to Council
Oconee County
415 S. Pine St
Walhalla, SC 29691
councilclerkinfo@oconeesc.com

Ken Roper
County Administrator
Pickens County
222 McDaniel Ave
B-10
Pickens, SC 29671
kenr@co.pickens.sc.us

David Gilstrap
Pickens County Water Authority
222 McDaniel Ave, 8-1
Pickens, SC 29671
gilstrap4@gmail.com

Steve Jewsbury
Pickens County Water Authority
222 McDaniel Ave, 8-1
Pickens, SC 29671
sjewsburyjr@bellsouth.net

Lynne Towe
Mayor
Town of Salem
5A Park Ave
Salem, SC 29676

Jamie Laughter
Transylvania County, NC
21 East Main St
Brevard, NC 28712
jaime.laughter@transylvaniacounty.org

Tribes

Wenonah Haire
Tribal Historic Preservation Officer
Catawba Indian Nation
1536 Tom Steven Rd
Rock Hill, SC 29730
wenonah.haire@catawba.com

William Harris
Chief
Catawba Indian Nation
996 Avenue of the Nations
Rock Hill, SC 29730

Elizabeth Toombs
Tribal Historic Preservation Officer
Cherokee Nation
22361 Bald Hill Road
Tahlequah, OK 74464
elizabeth-toombs@cherokee.org

Chief Richard Sneed
Eastern Band of Cherokee Indians
88 Council House Loop Rd
Cherokee, NC 28719
ashlstep@nc-cherokee.com

Russell Townsend
Tribal Historic Preservation Officer
Eastern Band of Cherokee Indians, Qualla
Boundary
P.O. Box 455
Cherokee, NC 28719
syerka@nc-cherokee.com

David Hill
Principal Chief
Muscogee (Creek) Nation
1007 East Eufaula St.
Okmulgee, OK 74447
dhill@mcn-nsn.gov

Bad Creek Pumped Storage Project (FERC No. 2740) Distribution List

Turner Hunt
Tribal Historic Preservation Officer
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447
thunt@muscogeenation.com

Acee Watt
Tribal Historic Preservation Officer
United Keetoowah Band of Cherokee Indians
18263 W. Keetoowah Circle
Tahlequah, OK 74465
awatt@ukb-nsn.gov

Non-Governmental

Terry Keene
Advocates for Quality Development (AQD)
jtk7140@me.com

Sue Williams
Advocates for Quality Development (AQD)
suewilliams130@gmail.com

Gerry Yantis
Advocates for Quality Development (AQD)
gcyantis2@yahoo.com

Gary Owens
President
Advocates for Quality Development, Inc.
P.O. Box 802
Seneca, SC 29679
growens@gmail.com

Peter Raabe
Southeast Regional Director
American Rivers
Praabe@americanrivers.org

Kevin Colburn
National Stewardship Director
American Whitewater
2725 Highland Dr
Missoula, Montana 59802
kevin@americanwhitewater.org

Jeff Lineberger
Duke Energy
jeff.lineberger@duke-energy.com

Garry Rice
Duke Energy
garry.rice@duke-energy.com

Alan Stuart
Duke Energy
alan.stuart@duke-energy.com

Phil Mitchell
Fishers Knob Homeowners Group
lputnammitchell@gmail.com

Heyward Douglas
Executive Director
Foothills Trail Conservancy
heyward69@gmail.com

Andrew Gleason
Foothills Trail Conservancy
andrewandwilla@hotmail.com

Glenn Hilliard
Foothills Trail Conservancy
glenn@hilliardgrp.com

Bill Ranson
Foothills Trail Conservancy
bill.ranson@retiree.furman.edu

John Hains
Friends of Lake Keowee Society
jhains@g.clemson.edu

Dale Wilde
Executive Director
Friends of Lake Keowee Society
1209 Stamp Creek Rd
Ste A
Salem, SC
dwilde@keoweefolks.org

Sarah Kulpa
HDR
440 S. Church St
Ste 1200
Charlotte, NC 28202
Sarah.Kulpa@hdrinc.com

Ray Hawkins
Jocassee Outdoor Center
516 Jocassee Lake Rd
Salem, NC 29676
fun@jocasseeoutdooreenter.com

Elizabeth Thomas Esq.
K&L Gates LLP
925 Fourth Ave
Ste 2900
Seattle, WA 98104
liz.Thomas@klGates.com

Mike Hoffstatter
Regional Director
National Wild Turkey Federation
770 Augusta Rd

Bad Creek Pumped Storage Project (FERC No. 2740) Distribution List

Edgefield, SC 29824
mhoffstatter@nwtf.net

Wes Cooler
Naturaland Trust
wes.cooler@mac.com

Dale Threatt-Taylor
Chief of Staff
Nature Conservancy
1417 Stuart Engals Blvd
Mount Pleasant, SC 29464
d.threatttaylor@tnc.org

Tim Gestwicki
Executive Director
North Carolina Wildlife Federation
2155 McClintock Rd
Charlotte, NC 28205
tim@ncwf.org

Annie Caggiano
President
Oconee Economic Alliance
528 Bypass 123
Ste G
Seneca, SC 29678
acaggiano@oconeesc.com

Michael Bedenburgh
Palmetto Trust for Historic Preservation
8301 Parklane Rd
Columbia, SC 29223
oldhouse@palmettotrust.org

Andy Douglas
S.C. Wildlife Federation
adoug41@att.net

Sara Green
Executive Director
South Carolina Wildlife Federation
sara@scwf.org

Bob King
Chapter President
Trout Unlimited, Chattooga River Chapter
40 Quartermaster Dr
Salem, SC 29676

Erika Hollis
Upstate Forever
507 Pettigru St
Greenville, SC 29601
ehollis@upstateforever.org

Chris Starker
Upstate Forever
507 Pettigru St
Greenville, SC 29601
cstarker@upstateforever.org

Mike Case
mgcase@icloud.com

Michael Corney
Mike_corney@yahoo.com

Steve Corney
Steve@corney.org

Simeon Ramsden
CEO Kipling Ventures
simeon@kiplingventures.com