

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED
12-06-16
04:59 PM

In The Matter of the Application of San Diego Gas & Electric Company (U902G) and Southern California Gas Company (U904G) for a Certificate of Public Convenience and Necessity for the Pipeline Safety & Reliability Project.

Application 15-09-013
(Filed September 30, 2015)

**JOINT MOTION TO POSTPONE PHASE 1 BRIEFS
UNTIL AFTER TESTIMONY AND HEARINGS, AMEND
THE SCOPING MEMO TO FOCUS ON LINE 1600
SAFETY, REQUIRE A COMPLETE APPLICATION, AND OTHER RELIEF**

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December 6, 2016

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I. INTRODUCTION

Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Office of Ratepayer Advocates (ORA), Protect Our Communities Foundation (“POC”), Sierra Club, Southern California Generation Coalition (“SCGC”), and The Utility Reform Network (“TURN”) (jointly, “Joint Intervenors”) move for four changes in the Scoping Memo and Ruling of Assigned Commissioner in Application (A.)15-09-013¹ (Scoping Memo). The proposed changes would allow for full development of a record to consider the issues in this proceeding, but would not extend the time to resolve these issues.

First, the Scoping Memo currently directs parties to brief a number of issues prior to submission of testimony and evidentiary hearings. Because these issues involve mixed questions of fact and law and cannot meaningfully be addressed prior to development of the record, the Joint Intervenors request this briefing occur after testimony and evidentiary hearings. The Joint Intervenors also propose a schedule for testimony, hearings and briefs.

Second, the Joint Intervenors request that the initial set of issues to be addressed in the first phase of this proceeding focus exclusively on the short-term safety of Line 1600 and address those urgent safety-related issues as expeditiously as possible. Addressing the short-term safety

¹ Application of San Diego Gas & Electric Company and Southern California Gas Company for a Certificate of Public Convenience and Necessity to Construct Line 3602 and De-rate Line 1600. Southern California Gas Company (“SoCalGas”) and San Diego Gas & Electric Company (“SDG&E”) (jointly, “Semptra Utilities”).

of Line 1600 will assist in narrowing the scope of issues in this proceeding and help inform the range of potential alternatives to the proposed Line 3602. Unlike need-related issues, safety can be addressed now with very limited risk that new information, such as updated demand forecasts that incorporate initiatives pursuant to SB 350 and other potential decarbonization measures, will render earlier findings and analyses inaccurate. To the knowledge of the Joint Intervenors, the only pending new safety-related information for Line 1600, that may have a material impact on the proceeding, is the ongoing In-Line Inspections (“ILI”) ordered by Resolution SED-1 on Line 1600.

Third, the Line 3602 Application remains incomplete. The Joint Intervenors ask the Commission to direct the Sempra Utilities to fill in the missing pieces in their testimony.

Finally, the Joint Intervenors recommend that the Commission add several additional questions to the scope of the proceeding, including several threshold issues related to the safety of Line 1600.

II. BACKGROUND

On July 8, 2016, the Commission’s Executive Director sent SDG&E a letter (“July 8 Letter”) directing it to:

- (1) Reduce pressure to 512 pounds per square inch gauge (psig), which represents a 20% reduction from design-based maximum allowable operating pressure (MAOP);
- (2) Perform In-Line Inspections (ILI) using identical technologies as in SDG&E’s previous ILI runs and compare the results with the 2012-2015 ILI data;
- (3) Replace the segment from Engineering Stations “17-131”; and,
- (4) Perform Quarterly Instrumented Leak Surveys on the entire transmission line.

On August 18, 2016, the Commission approved Resolution SED-1, ordering SDG&E to perform points one, two and three of the July 8 Letter. Resolution SED-1 also ordered SDG&E to perform leak surveys on the entirety of Line 1600 every other month (rather than quarterly), report to SED any leaks identified, and to provide a timeline to SED for submitting the bimonthly leak survey results.

On November 4, 2016, the Assigned Commissioner issued her Scoping Memo which stated:

In D. [Decision]14-06-007, SoCalGas and SDG&E were not seeking approval either to replace Line 1600 in the existing right-

of-way, or to build a new pipeline, like Line 3602, that lies outside of the existing Line 1600 right-of-way. [Footnote omitted.] Instead, inconsistent with the Applicants' implementation plan approved in those decisions, the Applicants now seek to derate to distribution service, but not pressure test and replace the existing Line 1600. (In response to protests, the Applicants now concede that Line 1600 can be taken out of service to conduct pressure testing without replacing that line.)²

On November 18, 2016, the Joint Intervenors attended a meet and confer session with the Sempra Utilities. The parties could not agree on a stipulation of facts. The Joint Intervenors understood that the Sempra Utilities would prepare their Phase 1 briefs based upon their testimony to date. Requiring parties to brief disputed issues of fact prior to serving intervenor and rebuttal testimony and holding evidentiary hearings puts intervening parties at a disadvantage, which means the Commission will not have a fully developed record, and leaves the Commission without a documented basis to support a decision.

III. MOTION

A. Briefing on Phase 1 Should Be Postponed Until All Parties Have Served Testimony and Hearings Have Been Held

The Scoping Memo provides for parties to file opening briefs on December 19, 2016, and reply briefs on January 23, 2017 to address certain "Legal/Policy" issues concerning "Long-term Need, Planning Assumptions, Standards of Review, Otay Mesa Supply" (Issues 1-7) and Short-term Line 1600 Safety Compliance (Issues 11-15).³ Only after this round of briefings would there be supplemental testimony from applicants (on February 20, 2017), intervenor testimony (on March 20, 2017), and evidentiary hearings (in May 2017).

The Joint Intervenors recommend modifying the Phase 1 schedule to adopt a more typical schedule with testimony and evidentiary hearings, followed by briefs.⁴

The current schedule requiring briefs on "Legal/Policy" issues before intervenors provide testimony and before a hearing is likely to confuse the record because several of the key issues

² November 2016 Scoping Memo, pp. 6-7.

³ November 2016 Scoping Memo, p. 23.

⁴ While POC advocates for postponing briefing, focusing Phase 1 on 1600 safety, and requiring Applicants to complete the application as called for in this motion, POC urges the Commission to complete CEQA prior to scheduling testimony and hearings related to proposed Line 3602. In this way, the record will be properly informed by a determination of whether there is a project need, and if so, a reasonable range of alternatives, all pursuant to CEQA. Such a procedure would provide for a properly informed Commission decision regarding Line 3602 and would be less costly for the Commission, ratepayers, and parties.

involve a mix of law, policy, and fact. Since the parties, including SoCalGas/SDG&E, were unable to reach stipulations of fact, there are no mutually accepted facts in the record of this proceeding. While the Sempra Utilities have submitted an application and testimony, those have not been entered into the record. Therefore, there are no actual facts in the record to cite in briefs.

Additionally, intervenors have not had an opportunity to complete discovery or to prepare testimony, again leaving the record without necessary evidence for the Commission to adopt findings of fact. Any briefs submitted at this point would have to rely primarily on untested statements contained in the Sempra Utilities testimony. Most of the issues identified in the Scoping Memo depend on material facts that may be disputed in expert testimony to be submitted by intervenors.⁵

For example, Issue 12 for legal/policy briefing includes the questions “[i]s the Applicants’ proposed derating of Line 1600 to 320 psig low enough to ensure the safety operations of Line 1600?” and “[w]hat is a sufficiently low pressure on Line 1600 to ensure safe operation?” These questions go to the heart of complex factual matters regarding the relationship between pipeline pressure, pipeline specified minimum yield strength (“SMYS”), and the risk and impact of rupture. The answers may rely on multiple interrelated facts, such as the interpretation and meaning of complex graphs concerning the relationship of rupture probability with pressure and crack size.

Requiring briefing first puts the cart before the horse. There is no advantage in accelerating the procedural schedule here because there will be no Phase 1 record upon which

⁵ As examples regarding material facts potentially in dispute:

Issue 6 includes the question “[i]s the level of gas transmission system reliability and redundancy that would be provided by the proposed Line 3602 reasonable?” This issue depends on material facts concerning gas demand that is one of the key areas of dispute in the proceeding. Even if there were facts in the record concerning forecast gas demand, it would remain impossible to completely answer this question without fully exploring the factual operating conditions of the SoCalGas/SDG&E system with Line 3010 in service, Line 1600 de-rated to 320 psig or lower, potential other potential gas receipt points to the system, and impacts of (or need for) the proposed additional capacity.

Issue 2 asks parties “what is the impact on gas demand for the proposed project when accounting for California’s decarbonization laws and other state and local mandates.” This question concerns facts concerning future demand forecasts and the impacts of certain policies on gas demand. There is no one simple and undisputed answer at this time, particularly given that current energy studies by the California Energy Commission have not yet addressed new legislation regarding decarbonization.

these briefs can be made, or upon which the Commission can base its decision. Recently, the California Court of Appeal annulled a Commission decision making a factual finding that a proposed project was needed based only upon uncorroborated hearsay evidence, the truth of which was disputed. *Utility Reform Network v. Public Utilities Commission* (2014) 223 Cal.App.4th 945, 966.⁶ Also, Cal. Pub. Util. Code §1757(a)(4) provides the following regarding judicial review of Commission decisions:

No new or additional evidence shall be introduced upon review by the court. In a complaint or enforcement proceeding, or in a ratemaking or licensing decision of specific application that is addressed to particular parties, the review by the court shall not extend further than to determine, on the basis of the entire record which shall be certified by the commission, whether any of the following occurred:

(4) The findings in the decision of the commission are not supported by substantial evidence in light of the whole record.

Given material issues of fact pertaining to Phase 1 questions, Commission findings based upon Phase 1 briefs that would be produced prior to creation of a record, including intervenor testimony and hearing transcripts, would be at risk on appeal.

Phase 1 of the proposed schedule further disadvantages intervenors by providing only one month between the Sempra Utilities supplemental testimony (February 20, 2017) and intervenor testimony (March 20, 2017). One month is not sufficient time for intervenors to conduct effective discovery if the Sempra Utilities present new information in their supplemental testimonies.

The Scoping Memo identifies six questions (questions 11 through 15 and 18) related to the safety compliance of Line 1600.⁷ The Presiding Officer should order the Sempra Utilities to provide additional testimony to address questions 11 through 15, and 18 in the Scoping Memo, plus the additional questions proposed in this motion,⁸ with supplemental testimony for SoCalGas/SDG&E due by January 20, 2017. To address this new round of safety related testimony, intervenors should then be given at least two months to conduct any necessary additional discovery and to prepare their testimony that is due on March 20, 2017, under the

⁶ See also *Cleancraft, Incorporated v. San Diego Gas and Electric Company* (1983) 11 C.P.U.C.2d 975, 984 [party's claim could not rest on "the hearsay opinions of unavailable experts"].

⁷ Scoping Memo at p. 11.

⁸ See Motion, Section III.B.

schedule in the Scoping Memo. Such a schedule will permit the development of a clear and accurate record.

The Joint Intervenor recommend the following schedule to provide for the resolution of to Phase 1 issues.

Proposed Schedule Relating to Phase 1:

- | | |
|--------------------------------------|---------------------------------|
| • Applicants' Supplemental Testimony | January 20, 2017 |
| • Intervenor's Testimony on Safety | March 20, 2017 |
| • Concurrent Rebuttal Testimony | April 17, 2017 |
| • Hearings | May 8-12, 2017 |
| • Opening Briefs | June 16, 2017 |
| • Reply Briefs | June 30, 2017 |
| • Commission Decision | After submittal of Reply Briefs |

This proposed schedule retains the Scoping Memo's dates for intervenor testimony, rebuttal testimony, and a hearing, but allows parties to brief issues after, rather than before the development of a record through the hearing process.

B. Phase 1 Should Focus Only On Questions Relating to the Short-Term Safety of Line 1600

The schedule and questions relating to Long-Term Need, Planning Assumptions, Standards of Review, and Otay Mesa Supply (Questions 1-10) should be moved to Phase 2 of this Proceeding. This would permit the Assigned Commissioner, Administrative Law Judge (ALJ), and parties to dedicate their efforts first and foremost to addressing the short-term safety of Line 1600 as expeditiously as possible.

The Scoping Memo appropriately prioritizes the Short-Term Line 1600 Safety Compliance questions 11 through 15 as questions to address immediately in Phase 1. The Joint Intervenor also recommend including question 18 in Phase 1 because it focuses exclusively on the safety of Line 1600, but the Joint Intervenor recommend leaving questions 16 and 17 to Phase 2 because they address, in part, need and other issues aside from the short-term safety of Line 1600. As Resolution SED-01 has demonstrated, the immediate safety issues and regarding Line 1600 are threshold issues. Their identification and resulting Commission Phase 1 decision could greatly inform the need under California Environmental Quality Act phases of the proceeding.

The measures needed to make Line 1600 safe will fundamentally inform project alternatives including Line 3602, and cost comparisons between those alternatives. For example, determinations establishing final maximum allowable operating pressure (“MAOP”) on Line 1600, will meaningfully inform the overall assessment of whether Line 3602 is needed, as well as the evaluation of alternatives to Line 3602. Attempting now to address other questions that are currently identified in the Scoping Memo as Phase 1 issues, such as the impact of gas demand when accounting for California’s decarbonization laws, would not benefit the record of this proceeding during Phase 1. While California has adopted aggressive decarbonization requirements, including mandatory greenhouse gas reductions of at least 40 percent below 1990 levels by 2030 and a doubling of efficiency of electric and natural gas end uses, state agencies such as the Air Resources Board (“ARB”) and California Energy Commission (“CEC”) are in the process of determining how these laws will be implemented.

For example, as part of the Scoping Plan for SB 32, the ARB is in the midst of establishing a pathway to meet California’s 2030 greenhouse gas reduction requirements. In its draft Scoping Plan Update, the ARB is considering the extent to which greenhouse gas reductions would be achieved through market mechanisms including cap-and-trade and direct measures such as a 60% RPS by 2030 and building electrification.² Resolution of these issues, such as the inclusion of new requirements for fuel switching, will impact gas demand projects and the assessment of need for the project. Similarly, utility targets to meet Senate Bill (SB) 350’s efficiency requirements will not be established until November 2017 and will not be incorporated into the CEC’s demand forecast until the 2018 Integrated Energy Policy Report (“IEPR”) in early 2018.¹⁰

Requiring testimony on the impact of California’s decarbonization requirements on gas demand at this early juncture would require parties to second guess final resolution of ongoing agency processes and likely require a revisiting of this issue at a later stage in the proceeding. Moving demand issues to Phase 2, which is not scheduled to commence until after the release of the ARB’s SB 32 Scoping Plan and the CEC’s 2018 Integrated Energy Policy Report is critical

² ARB, Public Workshop on the 2030 Scoping Plan (Nov. 7, 2016), Slides 24-25, <https://www.arb.ca.gov/cc/scopingplan/meetings/110716/scopingplanpresentation.pdf>

¹⁰ A timeline for SB 350 implementation measures is available at <http://www.energy.ca.gov/sb350/timeline.pdf>.

to ensuring an accurate and efficient assessment of future demand and need for the project, particularly since the proposed Line 3602 is expected to remain in service until 2120 or later.¹¹

In addition to questions 11-15 and 18 in the November 2016 Scoping Memo, the Joint Intervenors recommend that Phase 1 include several additional questions pertaining to the safety of Line 1600. These questions are not meant to be exhaustive.

Question A:

If de-rated to 320 psig or less, is Line 1600 a transmission line or a distribution line as defined by federal safety requirements? If Line 1600 can be called a distribution line in compliance with 49 Code of Federal Regulations Section 192.3 (Definitions), what are all of the steps that must be taken to do so? What are the implications, of SoCalGas/SDG&E operating and conducting safety assessments of Line 1600 as a distribution line rather than a transmission line?¹²

Question B:

If Line 1600 were pressure tested with gas to validate a maximum allowable operating pressure of up to 30 percent of Specified Minimum Yield Strength (“SMYS”), would this comply with the requirements of 49 CFR 192, Subpart J (Pressure Testing), and specifically Sections 192.507 and 192.503, PU Codes §§ 950 and 958, and General Order 112-F? What records is SoCalGas/SDG&E required to maintain if tested in this manner?

Question C:

What limitations are there to pressure testing a pipeline? How long does pressure testing reasonably ensure fitness for service of a pipeline?

Question D:

Is there a minimum pressure at which Line 1600 can safely operate?

¹¹ SoCalGas/SDG&E, Cost Effectiveness Analysis, pp. 27-28.

¹² Pursuant to 49 CFR Section 192.3, “**Transmission line** means a pipeline, other than a gathering line, that: (1) transports gas from a gathering line or storage facility to a gas distribution center, storage facility, or large volume customer that is not down-stream from a gas distribution center; (2) operates at a hoop stress of 20 percent or more of SMYS; or (3) transports gas within a storage field.” (Emphasis added.)

C. The Commission Should Require the Sempra Utilities to Complete The New Phase 2 Portion of Their Application By a Date Certain, Postpone the Phase 2 Schedule Until It Deems the Application Complete, and Dismiss the New Phase 2 Portion of Sempra Utilities Application If Not Completed Within a Reasonable Amount of Time

The Scoping Memo provides that “the Applicants should provide some of the missing information that should constitute the foundation of any application. We cannot evaluate a \$639 million project without sufficient information.”¹³ As a footnote to this statement, the Scoping Memo explicitly states, “The Original and Amended Application has never been deemed ‘complete,’ which was an original condition to be met before the scheduling of the prehearing conference.”¹⁴ The Scoping Memo provides an entire section identifying missing and/or incomplete information with Applicants’ application, noting:

Parties express concerns that the application is deficient because it does not comply with basic provisions of Rule 3.1 pertaining to CPCN “Construction or Extension of Facilities Requirements,” which require Applicants to provide the following basic information:

- Ten-year forecasted (maximum daily and annual daily average daily) volumes in the area to be served by the proposed Line 3602; including information on the quality of gas and broken down by customer type (*e.g.* core, noncore commercial and industrial, and noncore electric generation;
- Ten-year historic monthly volumes through Line 1600; and
- Ten-year historic daily and annual maximum volumes through Line 1600.

ORA and other parties argue that the Applicants fail to provide sufficient information in its Original or Amended Application. Instead, the Applicants assert that they don’t conduct any analysis or monitoring of the natural gas lines mentioned above.

ORA also explains that the Applicants don’t provide critical cost information, provide conflicting advice pertaining to the methodology to evaluate the “No Project” alternative; fail to isolate the “North Baja” or Otay Mesa alternative from the other “non-physical or minimal footprint alternatives,” and the North Baja/Otay Mesa alternative as evaluated in the Cost-Effectiveness Analysis assumes more receipt capacity at Otay Mesa (400 million metric cubic feet per day (MMcfd)) than what is indicated (or implied) as necessary in the original

¹³ November 2016 Scoping Memo, p. 11.

¹⁴ November 2016 Scoping Memo, p. 11, fn. 19.

PEA's [Preliminary Environmental Assessment] description of the North Baja Alternative (195 MMcfd).

According to the PEA: "The existing North Baja pipeline includes an available daily capacity of 185 MMcfd, which is approximately the same net quantity of additional capacity that the Proposed Project would provide [(200 MMcfd)]." The PEA further states: "Should capacity become available to the Applicant[s], the North Baja Alternative may be able to utilize existing infrastructure without requiring the construction of additional facilities and pipeline, and consequently without the associated environmental and social impacts and site suitability issue."

In this scoping memo, I agree with ORA's and other parties' similar observations that the Applicants should provide some of the missing information that should constitute the foundation of any application. We cannot evaluate a \$639 million project without sufficient information.¹⁵

The Joint Intervenors agree with the Assigned Commissioner's conclusion, and are concerned that parties cannot reasonably be expected to review and prepare testimony based on an incomplete application, nor would such an outcome provide the Commission with the necessary record to make required findings of fact in resolving this Application. While the Scoping Memo finds the Application remains incomplete, it does not set a requirement that the Sempra Utilities cure these deficiencies. This must be corrected. The Joint Intervenors recommend the Scoping Memo be revised to require the Sempra Utilities to answer the outstanding omissions in their Application when filing the supplemental testimony, and that the schedule for intervenor testimony and hearings be placed on hold until the Commission has deemed the Application complete. If Sempra Utilities cannot complete its application within a reasonable time, the application should be dismissed.¹⁶

IV. CONCLUSION

The Joint Intervenors request that the Commission grant each part of this motion to:

- 1) Postpone briefs on Phase 1 until after all parties have prepared and served testimony and hearings have been held;
- 2) Focus Phase 1 to include only questions relating to the short-term safety of Line 1600;

¹⁵ November 2016 Scoping Memo, pp. 10-11.

¹⁶ See D. 12-05-022 ("In this decision, we dismiss . . . the Application . . . for a Certificate of Public Convenience and Necessity. . . We take this action because, despite over 18 months of work, the application is not complete and does not conform to our requirements. We cannot continue to expend Commission or party resources on A.10-07-001.")

- 3) Add several questions related to the safety of Line 1600; and
- 4) Require Sempra Utilities to cure the deficiencies in the new Phase 2 portion of their application before moving forward with scheduling on issues unrelated to Line 1600 safety.

As discussed formally in the motion for expedited treatment, the Joint Intervenor also request expedited treatment regarding the first request to postpone briefs on Phase 1.

Respectfully submitted,

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