

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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COMMISSIONER LIANE RANDOLPH and
ADMINISTRATIVE LAW JUDGE AVA TRAN, presiding

Order Instituting Rulemaking to)	PREHEARING
Establish Policies, Processes, and)	CONFERENCE
Rules to Ensure Safe and Reliable)	
Gas Systems in California and)	
perform Long-Term Gas System)	
Planning.)	
)	Rulemaking
)	20-01-007
)	
)	

REPORTER'S TRANSCRIPT
Telephonic
March 24, 2020
Pages 1 - 73

Reported by: Jason A. Stacey, CSR No. 14092

TELEPHONIC

MARCH 24, 2020 - 2:30 p.m.

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ADMINISTRATIVE LAW JUDGE TRAN: Good afternoon. This is ALJ Tran. Before we get started today, I would like to go over a few housekeeping issues.

Let's go off the record.

(Off the record.)

ALJ TRAN: Good afternoon, everybody. This is the prehearing conference for Track 1-A and 1-B of the Order Instituting Rulemaking, or OIR, to Establish Policies, Processes and Rules to Ensure Safe and Reliable Gas Systems in California and to Perform Long-Term Gas Planning.

Today is March 24th, 2020. I am Administrative Law Judge Ava Tran. I will oversee and manage this proceeding in consultation with the assigned commissioner, Liane Randolph. We are fortunate to have the commissioner on the phone with us today.

The purpose of today's prehearing conference is to first address the service list and party status, followed by the scope of issues, schedule, need for hearing, and finally categorization. There will not be any final rulings made today with regard to

1 the scope, need for hearings, or schedule.
2 The assigned commissioner will decide these
3 matters in her scoping memo.

4 As a reminder for the benefit of our
5 court reporter today, I would like to ask
6 everyone to mute your phone unless you are
7 asked or called upon to speak and to please
8 speak clearly and slowly and to not
9 interrupt. If you would like to have a
10 transcript of today's prehearing conference,
11 you may request one by e-mailing
12 reporting@cpuc.ca.gov.

13 The first order of business today is
14 to address the service list and take
15 appearances. On the service list,
16 respondent's name in this OIR have been
17 automatically made parties to this
18 proceeding.

19 Additionally, pursuant to Article
20 1.4 of the Commission's Rules of Practice and
21 Procedures, if you filed a protest or a
22 response to this OIR, you are also a party to
23 this proceeding.

24 Lastly, we received numerous motions
25 for party status. All motions for party
26 status filed -- with the exception of one --
27 were granted yesterday on March 23rd by
28 e-mailed ruling.

1 I apologize that the Docket Office
2 has not been completely updated with all of
3 the e-mail rulings and the filings. But be
4 assured if you filed -- if you're named a
5 respondent or if you filed a comment or
6 protest and a motion, that they have been
7 granted.

8 I note that anyone else who wishes
9 to follow the proceeding can do so by
10 requesting the Commission's Process Office to
11 add their name to the service list in the
12 information only category.

13 We will remind everyone that we
14 encourage and require participation in order
15 to develop a clear and robust record in order
16 to arrive at an informed decision. If you
17 do not actively participate and make
18 substantial contributions to the record, you
19 may remove your party status to information
20 only.

21 Next, let's move on to appearances.
22 As I call your name, please state your
23 appearance for the record by responding
24 "present." Please note that I'm only listing
25 those representatives and parties that had
26 indicated that they intend to make comments
27 today.

28 Mr. Jonathan Pendleton with Pacific

1 Gas & Electric Company.

2 MR. PENDLETON: Present.

3 ALJ TRAN: Mr. Jonathan Newlander with
4 San Diego Gas & Electric.

5 MR. NEWLANDER: Present.

6 ALJ TRAN: Mr. Edward Hsu with Southern
7 California Gas.

8 MR. HSU: Present.

9 ALJ TRAN: Mr. Thomas Brill with
10 Central Gas -- Central Valley Gas Storage.

11 MR. BRILL: Present, your Honor.

12 ALJ TRAN: Mr. Jason Dubchak with Lodi
13 Gas Storage and Wild Goose Storage.

14 MR. DUBCHAK: Present.

15 ALJ TRAN: Ms. Carla Kolebuck with
16 Southwest Gas.

17 MS. KOLEBUCK: Present.

18 ALJ TRAN: Mr. Jordan Pinjuv with the
19 California ISO.

20 MR. PINJUV: Present.

21 ALJ TRAN: Mr.(sic) Marion Peleo with
22 the Public Advocates Office.

23 MS. PELEO: Present.

24 ALJ TRAN: Mr. Kevin Smith with SMUD.

25 MR. SMITH: Present.

26 ALJ TRAN: Mr. Mario Dominguez with
27 Southern California Edison.

28 MR. DOMINGUEZ: Present.

1 ALJ TRAN: Mr. Vid Prabhakaran with the
2 City of Long Beach.

3 MR. PRABHAKARAN: Present.

4 ALJ TRAN: Mr. Joseph Karp with
5 Calpine.

6 MR. KARP: Present.

7 ALJ TRAN: Mr. Brian Cragg with the
8 Independent Energy Producers.

9 MR. CRAGG: Present.

10 ALJ TRAN: Mr. Sean Beatty with NRG
11 Energy.

12 MR. BEATTY: Present.

13 ALJ TRAN: Mr. John Leslie with Shell
14 Energy North America.

15 MR. LESLIE: Present.

16 ALJ TRAN: Mr. Norman Pedersen with the
17 Southern California Generation Coalition.

18 MR. PEDERSEN: Present.

19 ALJ TRAN: Ms. Leah Capritta with SPURR
20 and United Energy Trading.

21 MS. CAPRITTA: Present.

22 ALJ TRAN: Mr. Ken Bohn with Tiger
23 Natural Gas.

24 MR. BOHN: Present.

25 ALJ TRAN: Mr. Gregory Klatt with
26 Transwestern Pipeline Company.

27 MR. KLATT: Present.

28 ALJ TRAN: Ms. Mishal Thadani with

1 Urbint.

2 (No response.)

3 ALJ TRAN: Mr. Brian Cragg with Vistra
4 Power Corp.

5 MR. CRAGG: Present.

6 ALJ TRAN: Mr. Gregory Klatt with the
7 Western Power Trading Forum.

8 MR. KLATT: Present.

9 ALJ TRAN: Mr. Roger Lin with the
10 California Environmental Justice Alliance.

11 MR. LIN: Present.

12 ALJ TRAN: Ms. Sara Myers with the
13 Center for Energy Efficiency and Renewable
14 Technologies.

15 MS. MYERS: Present.

16 ALJ TRAN: Mr. William Mumby with the
17 Coalition of California Utility Employees.

18 MR. MUMBY: Present.

19 ALJ TRAN: Ms. Elizabeth Kelly with the
20 Environmental Defense Fund.

21 MS. KELLY: Present.

22 ALJ TRAN: Mr. Matt Vespa with Sierra
23 Club and NRDC.

24 MR. VESPA: Present.

25 ALJ TRAN: Mr. Michael Alcantar with
26 Western States Petroleum Association.

27 (No response.)

28 ALJ TRAN: Ms. April Sommer with Wild

1 Tree Foundation.

2 MS. SOMMER: Present.

3 ALJ TRAN: Thank you. Mr. Michael
4 Florio with TURN.

5 MR. FLORIO: Present.

6 ALJ TRAN: Mr. Ronald Leibert with the
7 California Manufacturers Technology
8 Association.

9 MR. LIEBERT: Present.

10 ALJ TRAN: Ms. Nora Sheriff with the
11 Indicated Shippers.

12 MS. SHERIFF: Present.

13 ALJ TRAN: And lastly Dr. Gene Nelson
14 with the Californians for Green Nuclear
15 Power.

16 DR. NELSON: Present. Did you hear
17 that?

18 ALJ TRAN: I did. Thank you, Dr.
19 Nelson.

20 DR. NELSON: Thank you, your Honor.

21 ALJ TRAN: Okay. So now let's move on
22 to the issues in the scope of this
23 proceeding. As set forth in the OIR, the
24 Commission will be examining how
25 industry-related events that have occurred
26 since the last OIR require the Commission to
27 change the rules, processes, and regulations
28 governing gas utilities including but not

1 limited to the reliability standards,
2 long-term contracting, regulatory accounting,
3 reporting, and tariff changes for operational
4 flow orders.

5 This proceeding will be conducted in
6 three phases as we've discussed in the OIR.
7 Track 1-A will examine reliability standards
8 for the gas transmission system to determine,
9 among other things, whether design changes
10 are necessary to account for a warming
11 climate and the service capacity of current
12 and future gas system infrastructure.

13 Track 1-B will examine proposals for
14 mitigating the negative impact that
15 operational issues with the gas transmission
16 system have on wholesale and local gas
17 markets and gas system and electric
18 reliability grid -- electric grid
19 reliability.

20 Track 2 will determine the
21 regulatory solutions and long-term strategy
22 that the Commission should implement to
23 ensure that as the demand for natural gas
24 declines, gas utilities maintain safe and
25 reliable gas systems at just and reasonable
26 rates with minimal or no stranded costs.

27 For today's PHC, we will only be
28 discussing the scope for Track 1-A and Track

1 1-B. Please do not raise any comments with
2 regards to Track-2 as a separate PHC will be
3 held for Track-2.

4 The preliminary scope of issues and
5 the specific questions were outlined in the
6 OIR, so I will not repeat them here. But I
7 would like to take parties' comments on the
8 scope as outlined for Track 1-A and 1-B from
9 the representatives.

10 I would note that we've already
11 received written comments from most if not
12 all the representative groups speaking today.

13 (Phone interruption.)

14 ALJ TRAN: Can I have folks please mute
15 their phones again?

16 So I note that we have received
17 written comments from most if not all of the
18 groups represented today. But given the odd
19 circumstance of this PHC, we will be also
20 allowing parties to file post-prehearing
21 conference statements in this proceeding.

22 The post-prehearing conference
23 statement may only contain new information
24 and should not reiterate your previously
25 filed comments. These statements will be
26 limited to five pages and shall be filed and
27 served by no later than April 1st, 2020.

28 As a reminder, please wait until you

1 are called upon to speak based on your
2 speaking order. Given the lengthy speaking
3 list, we ask you to be concise and keep your
4 comments to two minutes or less as there are
5 many parties on this call today.

6 The post-PHC statement is another
7 opportunity for your party to provide
8 additional comments if not provided today.

9 Mr. Jonathan Pendleton with Pacific
10 Gas & Electric Company, do you have any
11 comments regarding the scope for Track A and
12 1-B?

13 MR. PENDLETON: Yes, thank you, your
14 Honor. This is Johnathan Pendleton for PG&E.
15 PG&E -- the comments I make today are really
16 focused solely on the preliminary scoping
17 memo not on any substantive positions. But
18 on Track 1-A, we believe that the issues you
19 listed in your e-mail are either -- we either
20 support having those in the scoping in this
21 proceeding, or we do not oppose having those
22 in the scope.

23 For Track 1-B, we do have a few
24 comments for consideration. The first of
25 those is you elicit in your e-mail under
26 Track -- letter B, consideration of whether
27 temporary OFO rules adopted in --

28 UNIDENTIFIED SPEAKER: Does anyone hear

1 anything? I do not hear anything.

2 MR. PENDLETON: Can people hear me?

3 ALJ TRAN: Yes. PG&E is speaking at
4 this time, and we ask everybody else to
5 please mute their phone.

6 MR. PENDLETON: I'm not sure. This is
7 John Pendleton. Can people hear me okay?

8 ALJ TRAN: Mr. Pendleton, we can hear
9 you fine.

10 MR. PENDLETON: Okay. Thank you. So
11 on B, under Track 1-B about the OFO rules,
12 the way that the topic is worded in the
13 e-mail asks whether it should be expanded and
14 extended beyond '20, '21. That decision was
15 specific to SoCalGas and SDG&E.

16 It was -- it came out in a
17 proceeding in an application that was filed
18 by SoCalGas and SDG&E and resulted in a
19 settlement agreement that was, I think,
20 subsequently modified.

21 But in any event, PG&E's OFO rules
22 were not at issue in that proceeding. And
23 PG&E requests that if that topic is included
24 in the scoping memo, that it be focused on
25 the SoCalGas, SDG&E system. Because, again,
26 that decision was not applicable to PG&E's
27 OFO rules.

28 The next comment that I would have

1 is on Track 1-B, C, and D, there were two
2 questions there that -- about consideration
3 of existing challenges. PG&E would request
4 that as part of the scoping memo, that we
5 include stepping on the questions that really
6 elicit the issues more precisely. Then from
7 there, I think that would help us to design
8 solutions. I think it would also help to
9 create a better record for the proceeding to
10 elicit those challenges.

11 Currently as drafted it discusses
12 current challenges, but I think some
13 additional precision in the form of questions
14 that would have parties identify those
15 challenges would be helpful. PG&E does not
16 believe that adding those questions would
17 hold up consideration of other Track 1-B
18 issues. But just believe it would help to
19 create a much better record.

20 And then on Track 1-BF, as in
21 "Frank," about consideration of cost and
22 allocation of cost across core and non-core
23 customers, PG&E recommends that this issue
24 should be considered in Track 2. We do
25 believe as we go through Tracks 1-A and 1-B,
26 we should be mindful of costs of course.
27 Particularly as decisions made in Track 1-A
28 and 1-B will impact the long-term planning

1 issues of Track 2. But we believe the
2 decisions regarding allocation of costs are
3 better addressed in Track 2.

4 And then one last comment on the
5 scoping memo topics. We do think it would be
6 helpful to -- in addition to the prehearing
7 conference comments -- to help build a record
8 by having parties file opening and reply
9 comments on the various topics in order to
10 help identify whether there might be
11 differences among parties; where there might
12 be factual issues. I think it would help the
13 workshop to run more effectively and
14 efficiently.

15 Thank you very much, your Honor.

16 ALJ TRAN: Thank you, Mr. Pendleton.

17 Next is Mr. Newlander with San Diego
18 Gas & Electric.

19 MR. NEWLANDER: Good afternoon. Thank
20 you, your Honor. In view of the lengthy
21 speaking list, I'll be very brief and not
22 reiterate points that we made in our opening
23 or reply comments.

24 We -- SDG&E has no objection to the
25 additional issues that you identify. We're
26 not taking a position one way or the other.
27 I guess I would just take note that with
28 respect to the issue of independent storage

1 providers, there's no storage -- gas storage
2 of any kind, an independent or otherwise, in
3 San Diego's service area. So to the extent
4 that issue is in scope, I'd request that that
5 clarification not be applicable to San Diego.

6 And with that, I guess I will -- I
7 understand that SoCalGas's counsel, Mr. Hsu,
8 is going to address some schedule issues. I
9 generally subscribe to his remarks.

10 Thank you very much.

11 ALJ TRAN: Thank you, Mr. Newlander.

12 Mr. Edward Hsu with Southern
13 California Gas.

14 And, Mr. Hsu, I would just remind
15 you that this portion of the PHC is to
16 address comments with regards to the scope.
17 We will be addressing the schedule later.

18 MR. HSU: Understood, your Honor.
19 Thank you. My comments are going to be
20 pretty limited as well. We don't oppose any
21 of the -- your Honor's Track 1-A and 1-B
22 supplemental issues from your e-mail.

23 We do have a couple comments similar
24 to Mr. Newlander's comments on 1-A-F.
25 SoCalGas doesn't have any independent storage
26 providers in the territory that would be able
27 to handle the load centers from where they
28 are located. So therefore it does seem to be

1 a Northern California type of issue. So we
2 would request limitation for that
3 clarification as well.

4 And also for Track 1-B, we would
5 just mention for the issues -- or the
6 consideration of cost -- allocation of cost
7 across core and non-core customers. We have
8 a similar thought that to the extent that
9 this could be performed in other proceedings
10 that are better suited for such as TCAP then
11 it might be more appropriate in a different
12 venue. So we request that the commissioner
13 and yourself consider that as well.

14 That's it for SoCalGas. Thank you.

15 ALJ TRAN: Thank you, Mr. Hsu.

16 Mr. Thomas Brill for Central Valley
17 Gas Storage.

18 MR. BRILL: Thank you, your Honor.
19 Thomas Brill representing Central Valley Gas
20 Storage. I'll also refer to my client as
21 "CVGS" during my comments.

22 I just want to be relatively brief
23 with respect to the list it seems that we
24 have on the list today. And the guidance
25 your Honor provided for the additional issues
26 That have been proposed for inclusion of
27 Track 1-A and 1-B.

28 Track 1-A proposed issue F would

1 include consideration of how independent
2 storage providers could be incorporated and
3 to develop reliability plans while minimizing
4 the stranded cost risks.

5 And Track 1-B proposed Issue E, is
6 consideration of whether gas-fired electric
7 generators should be required to purchase a
8 specific amount of storage capacity.

9 CVGS agrees with these two
10 proposals. We believe that an analysis of
11 both the --

12 (Phone interruption.)

13 MR. BRILL: -- and the regulatory
14 change is needed to improve coordination
15 between natural gas utilities and electric
16 generators requires consideration of a role
17 that can be played by storage providers.

18 This is for several reasons. First,
19 independent storage does not create standard
20 cost risk for utility ratepayers.

21 Second, independent storage protects
22 against disruption from the interstate
23 pipeline system and constraints at and
24 downstream of interconnections with
25 interstate pipelines.

26 Third, access to independent storage
27 providers to Northern California would have
28 mitigated crisis disruption that occurred in

1 Southern California.

2 Fourth, the analysis from this
3 proceeding would be incomplete if it did not
4 consider whether and how independent storage
5 should be incorporated into utility-wide
6 planning.

7 If the Commission for the same
8 reason intends to consider whether gas-fired
9 electric generators should be required to
10 purchase firm pipeline transportation
11 capacity, it should also consider whether
12 storage capacity --

13 (Phone interruption.)

14 MR. BRILL: -- alternative to any such
15 requirements.

16 In deference to the other comments
17 that I've heard so far and will probably hear
18 throughout the rest of the prehearing
19 conference, I want to emphasize that CVGS has
20 not set forth a particular position on any of
21 these issues. But we believe the proceeding
22 should have a scope that allows --

23 (Phone disruption.)

24 MR. BRILL: -- so that all options are
25 on the table as we move forward.

26 On scope and schedule, CVGS
27 generally agrees with the sequential phasing
28 of Tracks 1 and 2, but because the schedule

1 proposed --

2 ALJ TRAN: Mr. Brill?

3 MR. BRILL: Yes. I'm sorry.

4 ALJ TRAN: We will be addressing
5 schedule later on in this portion. So if I
6 could have you hold your comments with regard
7 to the schedule into that portion.

8 MR. BRILL: I'd be glad to. And with
9 that, those are my only comments on the
10 issues to be considered.

11 ALJ TRAN: Thank you.

12 Mr. Jason Dubchak with Lodi Gas
13 Storage and Wild Goose Storage. Do you have
14 any comments related to scope?

15 MR. DUBCHAK: Yes. Thank you, your
16 Honor. I would just echo my friend's
17 comments there from Central Valley that with
18 regard to Track 1-A issue Item 1-F and Track
19 1-B, Item 1-E, I think that each of those are
20 interrelated and should be considered either
21 together or in the first Track 1-A issue set.

22 And with regard to the other
23 comments made, with regard to the fact that
24 in Southern California there is no
25 independent storage right now, I -- obviously
26 that is a fact.

27 However, there have been discussions
28 in the past of the ability of the northern

1 independent storage providers to be able to
2 provide limited service to southern customers
3 potentially with the addition of some
4 infrastructure.

5 So although I do believe that there
6 is no current infrastructure there on the
7 natural gas storage side of things, that it
8 is worthy of at least some discussion as to
9 whether or not there is some limited service
10 that could be provided. And so I think that
11 goes to certainly the reliability issue and
12 whether or not there could be storage
13 provided in Southern California.

14 And that's all for my comments.

15 ALJ TRAN: Thank you.

16 Ms. Carla Kolebuck for Southwest
17 Gas.

18 MS. KOLEBUCK: Thank you, your Honor.
19 Yes. My comments from Southwest Gas's
20 perspective are very brief. In general
21 Southwest Gas does not have any objection to
22 the additional issues that are posed.

23 We would echo comments by SoCalGas
24 with respect to the Track 1-B sub part F
25 issue that perhaps costs and allocation
26 issues might be better addressed in a
27 different proceeding or perhaps in a
28 different track. Only noting that Southwest

1 Gas did also include some of the issues that
2 were referenced in Track 1-A bringing in
3 potential issues associated with interstate
4 pipeline capacity services.

5 So that's all our comments at this
6 point. Thank you.

7 ALJ TRAN: Thank you.

8 Mr. Jordan Pinjuv with the
9 California ISO.

10 MR. PINJUV: Good afternoon, your
11 Honor. Jordan Pinjuv with the California
12 ISO. Generally speaking we agree with the
13 scope of issues that were outlined in the
14 initial rulemaking and your March 18th e-mail
15 with the understanding that the issues that
16 the ISO raised regarding the intra-day and
17 hourly withdrawal needs related to the
18 electric generation be considered within
19 Track 1-B.

20 I think it gets specifically under
21 Track 1-B, item C, from your March 18th
22 e-mail. Consideration of existing challenges
23 for the gas-fired electric generators to
24 provide a required level of service for the
25 electric sector.

26 With that, I will turn it over.

27 ALJ TRAN: Thank you.

28 Next is -- is it Mr. or Ms. Peleo

1 with the Public Advocates Office?

2 MS. PELEO: Hi, your Honor. Thanks.
3 Marion Peleo for Public Advocates Office.

4 I won't reiterate what we said in
5 our reply comments. But I'll only say here
6 that we do not oppose the listing of issues
7 that were included in your e-mail from the
8 18th. And we appreciate the fact that cost
9 consideration will be in each track.

10 I don't have an opinion right now
11 about whether allocation should be in Track 1
12 or Track 2. I'll hold off commenting on that
13 in our PHC statement if we have a position on
14 that.

15 Thank you.

16 ALJ TRAN: Thank you.

17 Mr. Kevin Smith with SMUD.

18 MR. SMITH: Thank you, your Honor.
19 Thank you very much. Kevin Smith with SMUD.
20 Again, we made comments in the record. And
21 just on Track 1-A, not to repeat those, but
22 we just wanted to note our agreement with
23 Calpine with respect to reliability standards
24 that there be some rigorous cost benefit
25 assessment that gets done as part of the
26 record. That way we understand that what's
27 being done is being done in the most cost
28 effective way.

1 With respect to Track 1-B, SMUD
2 believes that requiring gas-fired generators
3 to purchase specific amounts of long-term
4 firm intrastate and interstate capacity is
5 out of scope in this proceeding. I think our
6 main concern is that, you know, there have
7 been notes within the actual OIR itself of
8 the 2017-2018 period, which was more
9 operationally based.

10 We have concerns that these
11 long-term contracts could end up costing our
12 customers and other customers quite a bit.
13 Specifically we have tolling arrangements and
14 other things that would be impacted. So we
15 think it's out of scope and we'd request that
16 it be removed from this Track 1-B.

17 And that's it for us right now, your
18 Honor.

19 ALJ TRAN: Thank you, Mr. Smith.

20 Mr. Mario Dominguez with California
21 -- Southern California Edison.

22 MR. DOMINGUEZ: Good afternoon, your
23 Honor. We don't have any comments with
24 respect to the issues at the moment from your
25 e-mail.

26 Thank you.

27 ALJ TRAN: Thank you.

28 Vid Prabhakaran with the City of

1 Long Beach.

2 MR. PRABHAKARAN: Thank you, your
3 Honor. Prabhakaran. Because the broader
4 scope of potential issues be discussed under
5 the bucket of discussing market structure and
6 regulations under Track 1-B, which we do not
7 oppose, we'd ask for one additional Track 1-B
8 issue. Which is the consideration of whether
9 current rules and tariffs continue to ensure
10 wholesale core customer parity with other
11 core customers with the regulated gas
12 utility.

13 Thank you.

14 ALJ TRAN: Thank you.

15 Mr. Joseph Karp with Calpine.

16 MR. KARP: Thank you, your Honor.
17 Calpine believes that the proper scope of
18 Tracks 1-A and 1-B ought to be on ensuring
19 the reliability of the level distribution
20 companies natural gas system and services
21 that they provide. We don't think that
22 Tracks 1-A or 1-B ought to be considering
23 changes in the electricity market.

24 And examples of appropriate items
25 for the scope of Tracks 1-A and 1-B would be
26 reliability standards and potential changes
27 to OFO rules and curtailment rules.

28 An example of an issue that should

1 not be considered in Tracks 1-A or 1-B would
2 be requirements for generators to procure
3 specific amounts of capacity as that is
4 primarily designed to impact pricing, price
5 volatility in the electricity markets. Which
6 is, as we said in our comments, an extremely
7 complicated topic.

8 As Mr. Smith indicated that trying
9 to influence the electricity market should
10 not be considered in the scope. If it's
11 considered at all, it should be considered in
12 Track 2. And the scope of Track 2 should be
13 broadened to consider all potential remedies
14 to electricity market issues.

15 An example of that kind of thing
16 would be proposals to change the RA rules,
17 resource adequacy rules. I believe that TURN
18 and CAISO proposed that we might change those
19 rules. That would not be within the scope of
20 this proceeding unless the scope is
21 significantly broadened. Again, we would
22 suggest that be on Track 2.

23 Thank you, your Honor.

24 ALJ TRAN: Thank you, Mr. Karp.

25 Mr. Brian Cragg, would you like to
26 speak for the Independent Energy Producers
27 and Vistra Power?

28 MR. CRAGG: Yes, your Honor. I can do

1 that. This is Brian Cragg for IEP and for
2 Vistra Energy. In general, IEP and Vistra
3 are okay with the scope of the issues as
4 defined in the regional order and in your
5 e-mail.

6 What's -- the possible exception of
7 Track 1-B-E which asks whether gas-fired
8 electric generation should be required to
9 purchase a specific amount of storage
10 capacity. The concerns there are similar to
11 the ones we mentioned in our comments with
12 regard to required purchases of firm
13 long-term transportation capacity.

14 There's a question of the
15 requirement aspects as not all electric
16 generators are subject to the PUC's
17 jurisdiction. There are independent
18 generators and also muni that would be
19 affected by that.

20 And there's a question about the
21 availability of storage and the cost of
22 storage. All those would need to be
23 considered before any such requirement could
24 be implemented. So that is the one issue I
25 think that may go beyond the scope of -- the
26 appropriate scope of this proceeding.

27 Thank you.

28 ALJ TRAN: Thank you.

1 Mr. Sean Beatty with NRG Energy.

2 MR. BEATTY: Thank you, your Honor.
3 Sean Beatty for NRG. Just in brief, I concur
4 with the comments that Mr. Karp and Mr. Cragg
5 have just made. NRG is concerned about
6 scoping Track 1-B in a way that would have
7 significant impacts on the RA framework.

8 We -- so for that reason, we think
9 that those specifics issues -- I -- long-term
10 or long-term pipeline capacity and also
11 procurement of storage should not be scoped
12 within this rulemaking.

13 That said, some conceptual topics
14 that were addressed in PG&E's opening
15 comments would be appropriate. And I think
16 that's consistent with some ideas that TURN
17 had argued in its reply comments as well.

18 So the specific proposals we would
19 be against scoping in the rulemaking. But if
20 the Commission decides that it's worth
21 examining the interaction between gas supply
22 and electric reliability, that's something
23 you can take up. And that's all.

24 Thank you.

25 ALJ TRAN: Thank you.

26 Next we have John Leslie with Shell
27 Energy North America.

28 MR. LESLIE: Track 1-A issues seem to

1 be appropriate.

2 With respect to Track 1-B, we have a
3 concern with letter sub A. The way the
4 question is presented, it presumes that
5 SoCalGas or SDG&E would establish a gas
6 supply commodity tariff, an optional tariff
7 for electric generators.

8 We think the question should be more
9 broadly whether that should be approved or as
10 an option for electric generation customers.

11 There are a number of sub issues
12 under that. For example, whether electric
13 generation customers can receive the same
14 service that a gas utility would provide from
15 third-party marketing companies?

16 Whether providing this gas tariff
17 would have a negative impact on core
18 customers?

19 Whether offering this gas tariff
20 would have a negative impact on other
21 non-core customers because electric
22 generation customers would somehow get
23 preferential access to firm storage, firm BTS
24 capacity, and firm interstate capacity.

25 There are a number of issues
26 including how this gas tariff might affect
27 the frequency of OFOs. That would need to be
28 explored if the Commission were to consider

1 this tariff. So we think that the issue
2 should be whether such a tariff should be
3 approved.

4 In addition with respect to Track
5 1-B-E, again, whether electric generation
6 customers should be required to purchase
7 storage capacity. I think a sub issue there
8 is whether that could result in increased
9 OFOs for a reduced amount of storage
10 available for balancing generally in the
11 market.

12 With those issues I will close.
13 Thank you.

14 ALJ TRAN: Thank you, Mr. Leslie.

15 Mr. Norman Pedersen with Southern
16 California Generation Coalition.

17 MR. PEDERSEN: Good afternoon, your
18 Honor. This is Norman Pedersen for SCGC. I
19 did not have the benefit of your March 18th
20 e-mail possibly because I was traveling all
21 day that day, Wednesday March 18th. So I'll
22 refer back to the original OIR.

23 We were first of all concerned about
24 the issue about gas-fired electric generators
25 being required to purchase capacity. The
26 members of SCGC are nonjurisdictional to the
27 CPUC. So, of course, we had the concern
28 about reach of the CPUC with regard to the

1 issue.

2 We also were querulous. It seems
3 like the issue arises because of the
4 application of North Baja to expand by 495
5 MMCFD leading to the prospect of North Baja
6 taking approximately 495 MMCFD translated
7 into megatherms on the El Paso System
8 proprieting the SoCalGas System about 480
9 MMCFD that currently flows across the El Paso
10 System to Ehrenberg.

11 And SoCalGas is current open season
12 for downstream intrastate firm capacity, they
13 are making available only 750 MMCFD, which is
14 likely to be fully subscribed. And so we
15 were querulous about how -- even if you could
16 reach out to nonjurisdictional electric
17 generators, you would be able to require them
18 to take upstream capacity, which it seems
19 would be stranded if there were only 750
20 MMCFD of capacity downstream of the Ehrenberg
21 receipt point.

22 We also raise a question in our
23 comments about the issue about coordination
24 between electric utilities and natural gas
25 utilities. At least in Southern California,
26 the balancing authorities it seems are now
27 quite well coordinated through some of the
28 recent experiences we've had in Southern

1 California with SoCalGas. And so we did not
2 quite understand what the focus of the
3 coordination issue was.

4 And actually if you were to delete
5 the question about taking firm back load
6 capacity and the question about coordination
7 from Track 1-B, that would lead the original
8 Track 1-B question about regulatory arbitrage
9 between the north and the south as the sole
10 remaining issue in Track 1-B. We were
11 unclear as to exactly what problem the
12 Commission was trying to get to with that
13 issue.

14 And we were also querulous as to
15 whether if you were just going to have that
16 issue remaining in Track 1-B, whether it's
17 necessary to have Track 1-B at all. In other
18 words, whether or not it would be possible to
19 collapse Track 1-B into Track 1-A so we can
20 have simply two tracks. Track 1 and Track 2,
21 which would make this proceeding more wieldy.

22 Thank you, your Honor.

23 ALJ TRAN: Thank you, Mr. Pedersen.

24 Next is Leah Capritta with SPURR and
25 United Energy Trading.

26 MS. CAPRITTA: Good afternoon, your
27 Honor. We -- SPURR and UET does not have any
28 dispute or any general comments to the issues

1 set forth in either Track 1-A or Track 1-B.
2 And that would be inclusive of the sub issue
3 set out in your e-mail.

4 A couple of additional points, which
5 I think does pail into both of those
6 categories and specifically with regard to
7 Track 1-A with the reliability standard.
8 And, again, we think this dovetails into some
9 of the comments particularly from your
10 e-mail.

11 We believe that this OIR should look
12 at the structure for allocating the stranded
13 costs and ensuring that those are allocated
14 in an equitable manner. We think that the
15 Commission should also look at the
16 consideration -- consider what the facilities
17 or the capacity that are the least reliable
18 and the -- and also happen to be the most
19 expensive.

20 We agree that the Commission should
21 revisit the current reliability standard.
22 And we would advocate for perhaps a move to a
23 less stringent standard. We think that the
24 -- that this proceeding should look at
25 whether or not or how to leverage the
26 dynamics of all market participants in lieu
27 of the current PG&E mandated structure.

28 And with regard to the dynamic that

1 is being suggested in the OIR, we are also
2 concerned that with fewer gas users, that
3 perhaps this will lead out -- this could lead
4 to a phase out of a storage obligation
5 altogether.

6 And we also think that the
7 Commission could look at more options to
8 voluntarily reduce usage.

9 Finally with regard to Track 1-B, we
10 would ask that with regard to cost allocation
11 for phasing out gas-fired energy generators,
12 that the Commission look at how those costs
13 are allocated. Obviously there are certain
14 market participants who are more easily able
15 to pay for those. And certainly some
16 consumers who are more easily -- who are more
17 easily able to pay for those than others.

18 With that I would close my comments.

19 ALJ TRAN: Thank you.

20 Mr. Ken Bohn with Tiger Natural Gas.

21 MR. BOHN: This is Ken Bohn with Tiger
22 Natural Gas. Good afternoon, your Honor.
23 Tiger Natural Gas has no opposition to the
24 current issues in Track 1-A and 1-B.

25 In Track 1-A, alternate resources
26 for CPA core transportation agents are not
27 specifically identified to be in scope. It
28 is somewhat implied as part of Track 1-A

1 issues. However, it should be specifically
2 identified as being part of the scope.

3 And that concludes my comments.

4 ALJ TRAN: Thank you.

5 Mr. Gregory Klatt for Transwestern
6 Pipeline Company.

7 Mr. Klatt, I also have you down for
8 Western Power Trading Forum. Would you like
9 to speak on both?

10 MR. KLATT: Sure. Thank you. Greg
11 Klatt for Transwestern first. I believe
12 Transwestern is the only interstate pipeline
13 company that is speaking today. I think it
14 may be the only interstate pipeline that has
15 requested party status. That could be
16 incorrect. I haven't checked the whole
17 service list, but that's my impression thus
18 far.

19 Transwestern doesn't have any
20 position on the particular issues yet. We'd
21 like to see how things develop in terms of
22 proposals. But I think something that may be
23 beneficial to the Commission is that
24 Transwestern can bring up-to-date information
25 about what's happening in the upstream
26 markets.

27 In past proceedings like this, we
28 notice that there was sometimes a lag between

1 what the Energy Commission was doing in terms
2 of their assessments of the gas markets and
3 the transportation networks and also what was
4 actually happening in realtime. So we look
5 forward to providing the Commission with
6 information in that regard.

7 For WPTF, again, we have a
8 broad-based membership. We have not yet
9 developed positions on any of the issues.
10 But we think it may be beneficial -- we may
11 be able to assist the Commission with
12 providing perspective of a trade organization
13 that represents a large number of not only
14 electricity but gas marketers too. And we
15 try to bring that balance perspective to the
16 issues.

17 And that's all I have. Thank you.

18 ALJ TRAN: Thank you.

19 Mr. Roger Lin with the California
20 Environmental Justice Alliance.

21 MR. LIN: Thank you, your Honor. At
22 this point only two quick comments. First,
23 the Commission should consider equity, the
24 impact on disadvantaged communities. The
25 impact on low-income residents at every
26 relevant stage in this proceeding. These are
27 not only Track-2 issues that should be
28 considered now at Track 1.

1 And second, we join reply comments
2 on the scope of proceeding with Sierra Club
3 and that will concur with their comments at
4 this stage of the proceeding. And we look
5 forward to commenting further.

6 Thank you for the time.

7 ALJ TRAN: Thank you.

8 Next we have Ms. Sara Myers for the
9 Center for Energy Efficiency and Renewable
10 Technology.

11 MS. MYERS: Thank you, your Honor.
12 Yes. Sara Myers for CERT. CERT filed
13 responsive comments on February 26th. And
14 actually we did propose the addition of an
15 issue to the scope of Track 1-B. That has
16 not been referenced in your March 18th
17 e-mail.

18 I will say that it's our
19 understanding that Track 1-B -- and I am
20 reading from the OIR is:

21 To identify and evaluate
22 opportunities for
23 mitigating the risk that
24 gas supply shortages pose
25 to electric reliability and
26 market prices.

27 Given the fact that the OIR also
28 seeks to emphasize the impact on this entire

1 issue of natural gas use of climate change,
2 CERT has proposed for the addition of an
3 issue to Track 1-B, which is market structure
4 and regulations and goes to the issues I just
5 read -- scope I just read. That the
6 Commission should consider directing the
7 natural gas utilities to identify and
8 establish demand response or other zero
9 carbon resource programs that could mitigate
10 gas supply shortages, improve reliability,
11 and affordability of gas service.

12 We think this is an important step.
13 It shouldn't wait till Track-2 and doesn't
14 need to. And certainly goes to the issues
15 again of both reliability, addressing gas
16 shortages especially in peak periods that
17 would impact electric reliability.

18 So we will hope that you would look
19 at that comment again and add that issue to
20 the scope of Track 1-B.

21 Thank you for your consideration.

22 ALJ TRAN: Thank you.

23 Next we have Mr. William Mumby with
24 the Coalition of California Energy and
25 Utility -- I'm sorry. Coalition of
26 California Utility Employees.

27 MR. MUMBY: Thank you, your Honor. Our
28 comments are primarily focused on Track-2

1 issues, so we do not wish to make any
2 comments on Track 1 at this time.

3 Thank you.

4 ALJ TRAN: Okay. Thank you.

5 Next we have Ms. Elizabeth Kelly
6 with the Environmental Defense Fund.

7 MS. KELLY: Your Honor, this is
8 Elizabeth Kelly. So with regards to the
9 additional issues from your Honor's e-mail,
10 with regards to Track 1-A, item C, we also
11 would like that really to mitigating
12 potential cost impacts.

13 Within that item, we ask that the
14 following questions be asked: Should the
15 timeline of cost recovery be changed in light
16 of broader long-term planning goals?

17 And another question is: Should the
18 rate of depreciation be accelerated to
19 affixate and not to the end of the useful
20 life.

21 And as a matter of additional
22 informational needs, we would like to know
23 what -- how many assets we're actually
24 talking about in the potentially stranded
25 segment.

26 With regards to Track A, Item E, the
27 consideration of cost and long-term
28 affordability of new reliability standards,

1 there are a couple of questions again here:
2 Should the timeline of the new standards be
3 adjusted not to be the expected useful life
4 of an asset, but the end of the economic life
5 of asset?

6 And further asking whether there
7 should be deference for different categories
8 of assets such as transmission or
9 distribution?

10 And also whether there are financial
11 incentives that should be created that could
12 allow for down rating of a high capacity line
13 to avoid upgrade while providing reliability.

14 And then the last item on Track 1-A,
15 Item F, this is the consideration of how
16 independent storage providers can be
17 incorporated?

18 EDF asks that the Commission ask
19 whether there is an affordability or
20 reliability benefit to using non-utility
21 owned storage fields.

22 With regards to Track 1-B, EDF will
23 respond to a couple of those and also note
24 that certain of our items that we had raised
25 did not make it into Track 1-B, but we
26 believe that is the correct spot for those.

27 With regard to Track 1-B, Item D,
28 that's the issue of lack of coordination

1 between electric utilities and natural gas
2 utilities. EDF asks that we identify which
3 specifically natural gas-fired electric
4 generators are going to be mission critical
5 so that we can prioritize their public
6 pipeline upgrades and send correct market
7 signals.

8 And EDF strongly supports item
9 1-B-F, the consideration of costs and
10 allocation of costs across the core and
11 non-core customers. We won't go into the
12 details of that. We will respond in our
13 post-PHC comments on that.

14 And then lastly there are three
15 items that EDF has raised in its comments
16 that we believe should be included in Track
17 1-B that require pre-work in advance of
18 Track-2. And these three items are
19 development of principals regarding
20 decarbonization. EDF has provided
21 examples --

22 ALJ TRAN: Ms. Kelly?

23 MS. KELLY: Yes.

24 ALJ TRAN: So I was just going to see
25 if you could wrap up really quickly as we are
26 running out of time.

27 And also those following comments
28 are related to Track-2. Again, we will be

1 having a separate PHC for Track 2. So that
2 would be the time to address Track 2 issues.

3 MS. KELLY: Yes, your Honor. I'll be
4 wrapping up in just a few seconds here.

5 The point being is we believe there
6 should be Track 1-B issues. Not Track-2
7 issues. So the first issue is the
8 development of principles regarding
9 decarbonization. The second relates to
10 legacy systems costs transparency. And the
11 third relates to stranded cost recovery.

12 So we will outline those in our
13 post-PHC comments. Thank you.

14 ALJ TRAN: Thank you.

15 Next we have Mr. Matt Vespa with the
16 Sierra Club and NRDC.

17 MR. VESPA: Thank you, your Honor.
18 Matt Vespa. Just to clarify. Sierra Club
19 and NRDC did file joint opening comments so
20 I'll be speaking on behalf of Sierra Club.
21 We don't have objection to the scope.

22 And also in particular support the
23 addition of Track 1-A-E, the consideration of
24 the cost and long-term affordability of due
25 reliability standards. And within that, it
26 also not -- I like to not just think about
27 the standards themselves, but compliance with
28 those standards and the context of declining

1 gap demand and how we might view compliance
2 where it's temporary. Because gas demand or
3 any kind of noncompliant is temporary due to
4 gas demand decline.

5 Thank you.

6 ALJ TRAN: Thank you.

7 Ms. April Sommer with the Wild Tree
8 Foundation.

9 MS. SOMMER: Hi. Good afternoon. To
10 just keep it real brief and we discuss this
11 in our comments. We do have an objection to
12 the scope in regards to reconsideration of
13 flat capacity requirements. I don't see that
14 what has been laid out in the OIR are
15 justification for reconsidering that are
16 valid.

17 And our concern is that's really
18 heading down the wrong direction. Looking at
19 the decreased load and the risk that this,
20 you know, making changes to the flat capacity
21 requirements with increased storage and
22 transport and the impacts that that would
23 have on methane leaks and efforts outward the
24 Commission and throughout the State in
25 regards to reducing greenhouse gas emissions.
26 I'll leave it at that.

27 Thank you.

28 ALJ TRAN: Thank you, Mr. Sommers.

1 Mr. Michael Florio with TURN.

2 MR. FLORIO: Yes. Mike Florio outside
3 counsel to TURN for Tracks 1-A and 1-B. I
4 think both Mr. Pendleton for PG&E and
5 Mr. Leslie for Shell pointed out that some of
6 the questions, as you say, have a lot of
7 presumptions behind them that might be better
8 spelled out. And I would endorse, you know,
9 both of their suggestions along that line.

10 I think we are interested in the
11 potential for a gas tariff for electric
12 generators. But there are a wide range of
13 questions that that brings up that would need
14 to be explored.

15 And similarly Mr. Pendleton's points
16 about, you know, needing to define more
17 clearly what some of the challenges are that
18 the Commission is looking at.

19 We don't agree with the suggestion
20 that certain issues regarding electric
21 generators should be ruled out of scope. I
22 think rather it should be broadened to look
23 at the whole range of issues about
24 reliability of service for electric
25 generation.

26 We would suggest combining Tracks
27 1-A and 1-B because there's substantial
28 overlap in the issues there. And we also

1 want to point out that there is significant
2 modeling work being undertaken in the Aliso
3 Canyon OII that should be closely coordinated
4 with this proceeding.

5 Other than that, we're fine with the
6 issues that have been identified.

7 That's all.

8 ALJ TRAN: Thank you, Mr. Florio.

9 Next is Mr. Ronald Leibert for the
10 California Manufacturer Technology
11 Association.

12 MR. LIEBERT: Thank you, your Honor.
13 CMTA represents a lot of very large non-core
14 gas customers primarily interested in what's
15 going on in Southern California.

16 Since I did not get your e-mail, I
17 don't the know the list of fictional
18 questions you've posed. But listening to
19 everyone else's comments, I don't see that we
20 have any problems with that list. And we
21 will be filing a motion for party status
22 shortly.

23 Thank you.

24 ALJ TRAN: Thank you.

25 Ms. Nora Sheriff with the Indicated
26 Shippers.

27 MS. SHERIFF: Thank you, your Honor.
28 Nora Sheriff for the Indicated Shippers. We

1 likely will be filing comment on April 1st on
2 your additional issues, which I just received
3 from a colleague.

4 I would also say the Indicated
5 Shippers initial support for the context of
6 collapsing Tracks 1-A and 1-B, I believe we
7 agree with Mr. Pedersen and also Mr. Florio
8 and others that there is some overlap among
9 those two tracks. And I will reiterate our
10 call for incorporating into the record here
11 the work that's being done in the Aliso
12 Canyon investigation. That modelling work we
13 think should really inform what the
14 Commission is looking at here as well as the
15 work in integrated resource planning
16 proceeding.

17 And with that I'll conclude these
18 brief comments --

19 (Phone interruption.)

20 MS. SHERIFF: -- thank you.

21 ALJ TRAN: Thank you. And just to
22 clarify, the additional issues that were
23 listed in my March 18th e-mail are not
24 additional issues that the Commission is
25 proposing to add. These were additional
26 issues that were raised in comments or
27 responses to the OIR.

28 Okay. So next -- lastly we have

1 Dr. Gene Nelson or the Californians for Green
2 Nuclear Power.

3 DR. NELSON: Yes. Gene Nelson
4 appearing for Californians for Green Nuclear
5 Power Incorporated. CGNP's previously filed
6 opening comments regarding Track 1-A focused
7 on reliability in the face of predictable
8 large-scale California natural disasters.

9 Our concerns are validated with the
10 near-term SoCalGas supply impairments to
11 cause outages of large San Diego Gas &
12 Electric generators in San Diego County as a
13 small-scale proxy for these natural
14 disasters.

15 Party CGNP underscores the
16 importance of energy security for California
17 electric generators to protect California
18 public safety and welfare.

19 I'd also like to raise a procedural
20 issue. I checked with the Filing Office just
21 before this call. I have a concern that no
22 large investor-owned utility has yet
23 requested copies of the transcript. We
24 request that deficiency should be remedied in
25 the interest of transparency in this
26 proceeding.

27 Thank you, your Honor.

28 ALJ TRAN: Thank you, Dr. Nelson.

1 Okay. That concludes our section on
2 the scope. Now let's move on to schedule and
3 the need for hearing.

4 In the OIR, we had preliminarily set
5 out a procedural pathway and a proposed
6 schedule for arriving at an informed decision
7 with workshops to be held and the potential
8 need for evidentiary hearings.

9 The proposed schedule for both Track
10 1-A and 1-B were outlined in the OIR. So I
11 will not repeat them here. But now we will
12 take very brief comments on the schedule and
13 the need for hearings.

14 I'll start off first with
15 Mr. Pendleton for Pacific Gas & Electric.

16 MR. PENDLETON: Thank you, your Honor.
17 We generally support the schedule that was
18 laid out for Tracks 1-A and 1-B. We do
19 support TURN's suggestion of combining the
20 two tracks. I know currently they're
21 slightly staggered. But we believe that it
22 may be more efficient just to combine them
23 and have all of the stakeholders
24 participating at one time.

25 And one other comment on the
26 schedule that would need -- if it's adopted
27 would need to possibly cause some adjustments
28 in the schedule would be the suggestion I

1 made earlier and also the two we made in our
2 opening comments about having a round of
3 briefing prior to the workshop on the scoping
4 memo topics, opening, and reply comments.

5 That may need to -- if it's adopted,
6 it may require that the schedule to be
7 shifted a little bit. But we think it would
8 be worth it as a benefit for the record and
9 in improving the workshop and clarifying some
10 of the issues that might be in dispute.

11 And in terms of -- I think it's
12 schedule and then do you want me to talk
13 about categorization as well at this time
14 also, your Honor?

15 ALJ TRAN: No. We will be addressing
16 categorization shortly. So just the comments
17 with regards to scope and the need for
18 hearings.

19 MR. PENDLETON: The need for hearings.
20 I'm sorry. Regarding the need for hearings,
21 we think there may be a need for hearings. I
22 think what PG&E would recommend is that after
23 the comments on the Workshop Report, that we
24 consider having another prehearing conference
25 to see if there are any factual issues that
26 would benefit from testimony and evidentiary
27 hearings.

28 But we have no objection to

1 submitting testimony or to hearings certainly
2 if deemed appropriate. But we would suggest
3 taking a closer look at that later in the
4 process.

5 ALJ TRAN: Thank you, Mr. Pendleton.

6 Mr. Newlander with San Diego Gas &
7 Electric.

8 MR. NEWLANDER: Thank you, your Honor.
9 No comment beyond what I indicated earlier on
10 scope that endorse the comments that Mr. Hsu
11 is about to make.

12 And that's it. Thank you.

13 ALJ TRAN: Thank you.

14 Mr. Hsu for Southern California Gas.

15 MR. HSU: Thank you, your Honor. My
16 comments here are probably -- are maybe
17 related to scope. Something to consider on
18 behalf of SoCalGas and SDG&E.

19 ALJ TRAN: I'm sorry, Mr. Hsu. Did you
20 say that this was -- your comments are
21 related to scope?

22 MR. HSU: I'm sorry. Schedule. I
23 misspoke, your Honor.

24 ALJ TRAN: Okay. Great.

25 MR. HSU: I apologize for that. Yes
26 this is schedule only. And request to
27 consider an extension of potentially two to
28 six months from the current schedule

1 including the upcoming schedule for the
2 workshops. And that is based on the fact
3 that we are dealing with an unprecedented
4 time in California as well as for the IOUs
5 and specifically SoCalGas and SDG&E.

6 The reliability standards are
7 important directives to address reliability
8 and require close management guidance as well
9 as technical expertise from those that are
10 operating our system. And right now,
11 frankly, we are dealing with an operational
12 issue. And so we've had to focus on the
13 safety of our employees as they provide
14 essential service for the customers that we
15 serve. And therefore there is -- it's very
16 challenging at this time to be able to
17 refocus on other long-term proceedings such
18 as this that will deal with general
19 reliability issues.

20 Therefore we think that providing an
21 extension of at least two months would allow
22 us to gauge where the IOUs will be at that
23 time and assess whether or not they'll be
24 able to provide sufficient proposals for
25 discussion at the workshops thereafter.

26 And as to the --

27 (Crosstalk.)

28 ALJ TRAN: Go ahead.

1 MR. HSU: Yes, your Honor. I apologize
2 for speaking over you.

3 I just wanted to finish the scope of
4 your question, which was the need for
5 evidentiary hearings. I think SoCalGas is
6 supportive of PG&E's thoughtful approach on
7 moving at a considerate fashion such that if
8 the Commission and stakeholders decide that
9 additional information is needed after the
10 workshop and the briefing for the workshops,
11 that we determine the need at that point.

12 Thank you.

13 ALJ TRAN: Thank you.

14 Mr. Thomas Brill with Central Valley
15 Gas Storage. Comments on the schedule and
16 need for hearing.

17 MR. BRILL: Thank you, your Honor. I
18 -- CVGS would note that the schedules
19 proposed for Tracks 1-A and 1-B are largely
20 overlapping. And also that the issues
21 relevant to determinations be made in Track
22 1-A could be impacted by determinations made
23 in 1-B. For those reasons, we would join
24 TURN in suggesting that Tracks 1-A and 1-B be
25 consolidated.

26 With regard to the need for
27 hearings, it's too early as most parties
28 noted to determine whether hearings will or

1 will not be necessary. But we would suggest
2 -- because many parties have said that they
3 might be necessary and we agree -- that the
4 schedule include a placeholder for hearings
5 should they become necessary.

6 Those are our comments. Thank you,
7 your Honor.

8 ALJ TRAN: Thank you.

9 Mr. Jason Dubchak for Lodi Gas and
10 -- Lodi Gas Storage and Wild Goose Storage.

11 MR. DUBCHAK: We have no further
12 comment at this point, Your Honor.

13 ALJ TRAN: Thank you.

14 Ms. Carla Kolebuck for Southwest
15 Gas.

16 MS. KOLEBUCK: Thank you, your Honor.
17 We would just reiterate that we don't -- we
18 would support the proposed schedule, but we
19 also would not oppose if the Commission was
20 so inclined to extend it in light of the
21 current circumstances.

22 ALJ TRAN: Thank you.

23 Mr. Jordan Pinjuv with the
24 California ISO.

25 MR. PINJUV: We have no additional
26 comments at this time.

27 ALJ TRAN: Thank you.

28 Ms. Peleo with the Public Advocates

1 Office.

2 MS. PELEO: Thank you, your Honor. We
3 don't oppose combining Tracks 1-A and 1-B
4 into one track proposed by TURN.

5 ALJ TRAN: Thank you.

6 Mr. Kevin Smith with SMUD.

7 MR. SMITH: Hi, your Honor. I think
8 SMUD would also be willing to consider the
9 1-A, 1-B collapse as proposed.

10 And that's all of our comments at
11 this moment. Thank you.

12 ALJ TRAN: Thank you.

13 Mr. Mario Dominguez with Southern
14 California Edison.

15 MR. DOMINGUEZ: Good afternoon, your
16 Honor. We would only make the addition -- we
17 also echo that hearings may be needed later,
18 and we can determine that at a later date.

19 But we'd also like to request that
20 whether that Track 1-A and 1-B are collapsed
21 or whether they remain separate, that a
22 placeholder for testimony be included after
23 the workshop as we feel that's going to help
24 develop the record.

25 That's all of our of comments.
26 Thank you.

27 ALJ TRAN: Thank you.

28 Mr. Vid Prabhakaran.

1 MR. PRABHAKARAN: No additional
2 comments, your Honor.

3 ALJ TRAN: Thank you.

4 Mr. Joseph Karp for Calpine.

5 MR. KARP: Thank you, your Honor. We
6 believe hearings likely will be needed on
7 tracks 1-A and 1-B. Particularly if the
8 scope remains as initially proposed in the
9 OIR. We think it makes sense to plan for
10 such hearings. And if it turns out that the
11 scope is changed or the issues in the
12 workshop are resolved, that that could be
13 changed.

14 Thank you.

15 ALJ TRAN: Thank you, Mr. Karp.

16 Mr. Brian Cragg for the Independent
17 Energy Producers and for Vistra Power.

18 MR. CRAGG: Thank you, your Honor. I
19 think the comments today have revealed that
20 there are lot of issues that are potentially
21 within the scope of this proceeding. And
22 within each issue, there are a number of sub
23 issues or subcomponents that need to be
24 considered.

25 Because of that, I found
26 Mr. Pendleton's suggestion to be worth
27 considering. There might be an opportunity
28 for some sort of briefing or comments after

1 the scoping memo is issued just to, if
2 nothing else, narrow down the issues that are
3 still in dispute.

4 And for similar reasons, I think it
5 might be good to defer the issue about
6 whether evidentiary hearings are necessary to
7 a later date when the scoping tells us and
8 the issues in dispute become a little more
9 clear. It probably makes sense, as others
10 have suggested, to reserve some time for
11 evidentiary hearings in case they prove
12 necessary.

13 And those are all my comments.
14 Thank you.

15 ALJ TRAN: Thank you.

16 Mr. Sean Beatty with NRG Energy.

17 MR. BEATTY: Thank you, your Honor. No
18 further comments.

19 ALJ TRAN: Thank you.

20 Mr. John Leslie with Shell Energy
21 North America.

22 MR. LESLIE: Yes, your Honor. It seems
23 to make sense to combine or collapse the
24 Track 1-A and Track 1-B issues into a single
25 process. And we also agree that the
26 Commission should wait to determine whether
27 evidentiary hearings are necessary until
28 we've gone a little bit further down the road

1 and identified the issues -- potentially
2 issues of fact that arise from some of the
3 proposals in this proceeding.

4 Thank you.

5 ALJ TRAN: Thank you.

6 Mr. Norm Pedersen with the Southern
7 California Generation Coalition.

8 MR. PEDERSEN: Thank you, your Honor.
9 As far as SCGC is concerned, I think I can
10 say we're pleased to see that a number of
11 people who are now supporting both collapsing
12 1-A and 1-B together to a single Phase 1
13 particularly given the overlap issues.

14 As far as hearings are concerned, in
15 our opening comments, we strongly supported
16 an opportunity for discovery, preparation of
17 testimony, and hearings as is customary in
18 ratemaking proceedings. And, of course,
19 we'll discuss categorization soon. We have a
20 very explicit view on categorization.

21 We were the veteran of R.04-01-025,
22 which is the precursor to this proceeding.
23 And our experience in that proceeding led us
24 to strongly advocate, as I just mentioned,
25 holding hearings and having a schedule in
26 this proceeding that includes hearings.

27 We have no objection to starting out
28 with some workshops. But in our view, they

1 are most likely going to point very directly
2 to the need for hearings given the factual
3 nature of the issues that we have in this
4 proceeding in Phases 1-A and 1-B. So, yes.
5 We support a schedule that would include
6 hearings.

7 Thank you, your Honor.

8 ALJ TRAN: Thank you.

9 Ms. Leah Capritta with SPURR and
10 United Energy Trading.

11 MS. CAPRITTA: Thank you, your Honor.
12 SPURR and UET would agree that combining Tracks
13 1-A and 1-B sounds like a good approach. And
14 we would also support deferring the decision
15 on holding a hearing until sometime -- until
16 we figure out whether or not it's needed.

17 Thank you.

18 ALJ TRAN: Thank you.

19 Mr. Ken Bohn with Tiger Natural Gas.

20 MR. BOHN: Thank you, your Honor.

21 Regarding hearings, we would like the
22 Commission to minimize evidentiary hearings
23 to the extent possible. You probably need to
24 reserve time for hearings, but try to
25 minimize the use of those hearings if
26 possible.

27 Thank you, your Honor.

28 ALJ TRAN: Thank you.

1 Mr. Gregory Klatt with Transwestern
2 Pipeline and also Western Power Trading.

3 MR. KLATT: Thank you, your Honor. No
4 further comments on the schedule.

5 ALJ TRAN: Mr. Roger Lin with the
6 California Environmental Justice Alliance.

7 MR. LIN: No comments at this time on
8 schedule. Thanks.

9 ALJ TRAN: Thank you.

10 Ms. Myers, Ms. Sara Myers for the
11 Center for Energy Efficiency and Renewable
12 Technology.

13 MS. MYERS: Thank you, your Honor. I
14 have no comments on the schedule. Except I
15 know it is CERT's interest also. I know I'm
16 not talking to the scope of Track-2 but that
17 it is unduly delayed. So there's a lot of
18 issues obviously in these two tracks. But if
19 they are combined and more streamlined, I
20 hope that's a good reason to move forward
21 quickly in Track-2.

22 Thank you.

23 ALJ TRAN: Thank you.

24 Ms. Elizabeth Kelly with the
25 Environmental Defense Fund.

26 MS. KELLY: Thank you, your Honor. EDF
27 supports the idea of consolidating Track 1-A
28 and Track 1-B. We note that just one single

1 workshop is probably not going to be
2 sufficient. So your Honor may wish to plan
3 for a series of workshops. And you could --
4 an option to the Track 1-A schedule until
5 after the workshop time and then shift over
6 from -- publish the Workshop Report and use
7 the Track-2 schedule.

8 We also recommend that after the
9 Workshop Report happens, that may be the time
10 to add an item in the schedule directing the
11 respondent to provide a list of disputed
12 facts that would be developed among all the
13 parties. So then that would refine what, if
14 anything, would be ton go to hearings. At
15 the time we don't believe that hearings will
16 be necessary.

17 And that's extent of our comments.
18 Thank you.

19 ALJ TRAN: Thank you.

20 Mr. Matt Vespa with the Sierra Club.

21 MR. VESPA: No further comments. Thank
22 you, your Honor.

23 ALJ TRAN: Thank you.

24 Ms. April Sommer with the Wild Tree
25 Foundation.

26 MS. SOMMER: Yes. Just would briefly
27 like to reiterate that I do not quite
28 understand why Track-2 is so delayed, and

1 that that's something that we very strongly
2 advocate. That there's not any reason to
3 begin that as soon as possible. And also
4 definitely believe hearings are needed and
5 that should be on the schedule now.

6 Thank you.

7 ALJ TRAN: Thank you.

8 Mr. Michael Florio with TURN.

9 MR. FLORIO: Yes. Mike Florio here. I
10 generally agree with what people have been
11 saying. I think hearings are likely to be
12 necessary. But we can wait until later to
13 make that firm determination. But probably
14 should make room in the schedule.

15 I think we also need some attention
16 to what happens on the front end even before
17 the workshops. I think we have a need for
18 some basic information to be provided by the
19 respondents. What precisely are the existing
20 reliability standards?

21 Perhaps what some operational data
22 that would show, you know, what problems have
23 existed on the system. We made some
24 suggestions in our opening comments on what
25 some of that opening information might
26 include.

27 I agree with Mr. Pedersen that
28 discovery will eventually be necessary. But

1 I think having an opening factual
2 presentation by the respondents would cut
3 down a lot on the discovery that otherwise
4 would be needed.

5 Some of the parties have been
6 heavily involved in gas issues for years.
7 And others are newer to the process. And I
8 think we have a pretty significant gap in the
9 basic factual information that the parties
10 have. And I think it would be helpful to
11 accumulate and distribute that even before we
12 get to a workshop so people are working for a
13 more common set of facts.

14 That's all.

15 ALJ TRAN: Thank you, Mr. Florio.

16 Mr. Ronald Liebert with the
17 California Manufacturer Technology
18 Association.

19 MR. LIEBERT: Thank you, your Honor.
20 For once I fully agree with everything that
21 Mike Florio just said. And I also support
22 the consolidation of Track 1-A and Track 1-B.

23 Thank you.

24 ALJ TRAN: Thank you.

25 Ms. Nora Sheriff with Indicated
26 Shippers.

27 MS. SHERIFF: Thank you, your Honor.
28 As we said previously, Indicated Shippers

1 does support consolidation of Tracks 1-A and
2 1-B.

3 I also agree that there should be a
4 level setting approach in terms of data.
5 Dates of analysis is always critically
6 important. And in a rulemaking, I think are
7 even more so important given the risk that
8 we're seeing towards reliability.

9 I would also recommend including
10 placeholders for testimony and evidentiary
11 hearings in the schedule.

12 Thank you.

13 ALJ TRAN: Thank you.

14 And lastly, Dr. Gene Nelson with the
15 California -- excuse me. Californians for
16 Green Nuclear Power Incorp.

17 DR. NELSON: Thank you, your Honor. I
18 would like to affirm the comments of both
19 PG&E and SoCalGas and the further
20 clarifications articulated by both SCGC and
21 TURN which is, of course, surprising for
22 CGNP.

23 Thank you, your Honor.

24 ALJ TRAN: Thank you.

25 Okay. Next let's move on to
26 categorization. This OIR preliminarily
27 categorized this proceeding as
28 quasi-legislative. And accordingly ex parte

1 communications would be permitted pursuant to
2 Article 8 of these rules. I now would like
3 to take very brief comments on this subject.

4 However, I would ask that if you
5 agree with the categorization that's been
6 preliminarily set out in the OIR, that we
7 will just move on and just hear from folks
8 that have different thoughts.

9 So we'll start off with Mr. Jonathan
10 Pendleton with PG&E.

11 MR. PENDLETON: Thank you, your Honor.
12 We do agree with the preliminary
13 categorization although with one caveat,
14 which is that we could envision the
15 proceeding shifting to more of a ratesetting
16 proceeding or at least have ratesetting
17 aspects if we get into cost allocation issues
18 in Track 2 or sooner however it's ultimately
19 structured. So we agree that currently
20 quasi-legislative is appropriate.

21 And one other note on that in terms
22 of a note some parties have raised concerns
23 about ex parte communications and
24 categorizing the proceeding as ratesetting to
25 have reporting requirements to have the ex
26 parte ratesetting rules apply. And PG&E has
27 no objection to applying those -- the ex
28 parte rules for a ratesetting proceeding to

1 this proceeding, but does believe that
2 quasi-legislative is the appropriate
3 categorization.

4 ALJ TRAN: Thank you.

5 Mr. Newlander with San Diego Gas &
6 Electric.

7 MR. NEWLANDER: Thank you, your Honor.
8 I concur with the comments that Mr. Pendleton
9 just made.

10 ALJ TRAN: Thank you.

11 Mr. Edward Hsu with Southern
12 California Gas.

13 MR. HSU: Thank you, your Honor. Same
14 for SoCalGas. I believe PG&E's description
15 is consistent with SoCalGas's comments.

16 Thank you.

17 ALJ TRAN: Thank you.

18 Mr. Thomas Brill with Central Valley
19 Gas Storage.

20 MR. BRILL: Thank you, your Honor. We
21 have no comments on this.

22 ALJ TRAN: Thank you.

23 Mr. Jason Dubchak with Lodi Gas
24 Storage and Wild Goose Storage.

25 MR. DUBCHAK: We have no further
26 comments, your Honor.

27 ALJ TRAN: Thank you.

28 Ms. Carla Kolebuck with Southwest

1 Gas.

2 MS. KOLEBUCK: Thank you, your Honor.
3 We would just echo Mr. Pendleton's comments
4 from PG&E.

5 Thank you.

6 ALJ TRAN: Thank you.

7 Mr. Jordan Pinjuv with the
8 California ISO.

9 MR. PINJUV: Thank you. No additional
10 comments at this time.

11 ALJ TRAN: Thank you.

12 Ms. Marion Peleo with the Public
13 Advocates Office.

14 MS. PELEO: Thank you, your Honor. We
15 said in our reply comments we agree with
16 other parties' recommendations that this be
17 categorized as a ratesetting proceeding.

18 But our main concern is really the
19 ex parte contact be reported. So we can live
20 with having it be categorized as
21 quasi-legislative if the Commission applies
22 ex parte reporting rules as it can consistent
23 with the rules.

24 Thank you.

25 ALJ TRAN: Thank you.

26 Mr. Kevin Smith with SMUD.

27 MR. SMITH: SMUD concurs with PG&E.

28 ALJ TRAN: Mr. Mario Dominguez with

1 Southern California Edison.

2 MR. DOMINGUEZ: We have no further
3 comments, your Honor.

4 ALJ TRAN: Thank you.

5 Mr. Vid Prabhakaran with the City of
6 Long Beach.

7 MR. PRABHAKARAN: No further comments.

8 ALJ TRAN: Mr. Joseph Karp with
9 Calpine.

10 MR. KARP: Thank you, your Honor. We
11 have no position on this matter.

12 ALJ TRAN: Thank you.

13 Mr. Brain Cragg with the Independent
14 Energy Producers and Vistra Power.

15 MR. CRAGG: No additional comments,
16 your Honor.

17 ALJ TRAN: Thank you.

18 Mr. Sean Beatty with NRG Energy.

19 MR. BEATTY: Thank you, your Honor. If
20 the Track 1-B remains scoped as it is
21 currently, we would support changing the
22 categorization to ratesetting.

23 If it is changed as we provided in
24 our comments and other parties' comments,
25 then we have nothing to say on this issue.

26 ALJ TRAN: Okay.

27 Mr. John Leslie with Shell Energy
28 North America.

1 MR. LESLIE: Your Honor, if Track 1-B
2 includes issue A, consideration of gas supply
3 tariff for electric generation customers, is
4 clearly a ratesetting issue. And the
5 proceeding should be categorized as a
6 ratesetting.

7 This issue alone will address the
8 allocation of cost and the impact on rates
9 for core and non-core customers. We believe
10 this is clearly a ratesetting matter.

11 ALJ TRAN: Thank you.

12 Mr. Norm Pedersen with the Southern
13 California Generation Coalition.

14 MR. PEDERSEN: Thank you, your Honor.
15 We strongly support categorizing this
16 proceeding as ratesetting. Every single
17 proceeding to which this would be a successor
18 was a ratesetting proceeding. R.04-01-025
19 was a ratesetting proceeding. SoCalGas OFO
20 proceeding was a ratesetting proceeding. The
21 curtailment procedures proceeding was a
22 ratesetting proceeding. We went through and
23 pretty much cataloged in our opening comments
24 --

25 (Phone interruption.)

26 MR. PEDERSEN: So if you just take a
27 look at those, I think you'll see that indeed
28 the Commission has consistently set issues

1 such as the ones we're considering here for a
2 ratesetting proceeding.

3 Furthermore, we are very concerned
4 about the ex parte rules not applying if this
5 is a quasi-legislative proceeding. So, yes,
6 we would encourage a change from
7 quasi-legislative to ratesetting as far as
8 the categorization is concerned.

9 Thank you.

10 ALJ TRAN: Thank you.

11 Just as a reminder. If I could have
12 everybody mute their phones unless they are
13 being called upon to speak. There's a lot of
14 background noise that I'm hearing.

15 Next we have Ms. Leah Capritta with
16 SPURR and United Energy Trading.

17 MS. CAPRITTA: No additional comments,
18 your Honor. Thank you.

19 ALJ TRAN: Thank you.

20 Mr. Ken Bohn with Tiger Natural Gas,
21 comments on the categorization.

22 MR. BOHN: Tiger has no additional
23 comments, Your Honor.

24 ALJ TRAN: Thank you.

25 Mr. Gregory Klatt for Transwestern
26 Pipeline and for Western Power Trading.

27 MR. KLATT: Thank you, your Honor. No
28 further comments.

1 ALJ TRAN: Thank you.

2 Mr. Roger Lin with the environmental
3 -- the California Environmental Justice
4 Alliance.

5 MR. LIN: No comments, your Honor.
6 thank you again.

7 ALJ TRAN: Thank you.

8 Ms. Sara Myers with the Center for
9 Energy Efficiency and Renewable Technology.

10 MS. MYERS: Thank you, your Honor. No
11 comments. Thank you.

12 ALJ TRAN: Thank you.

13 Mr. William Mumby with the Coalition
14 of California Utility Employees.

15 MR. MUMBY: No comment, your Honor.
16 Thank you.

17 ALJ TRAN: Ms. Elizabeth Kelly for the
18 Environmental Defense Fund.

19 MS. KELLY: No comment, your Honor.
20 Thank you.

21 ALJ TRAN: Mr. Matt Vespa for the
22 Sierra Club.

23 MR. VESPA: Your Honor, we do support a
24 ratesetting categorization. But our chief
25 concern is making sure the ex parte reporting
26 requirements apply.

27 Thank you.

28 ALJ TRAN: Thank you.

1 Ms. April Sommer with Wild Tree
2 Foundation.

3 MS. SOMMER: No comments. Thank you.

4 ALJ TRAN: Mr. Mike Florio with TURN.

5 MR. FLORIO: Yes, your Honor. Our
6 primary concern was the ex parte reporting.
7 I don't think I heard anybody object to that.
8 So I would just reinforce that we'd like to
9 see that.

10 I think Mr. Pendleton kicked it off
11 very well that, you know, probably as we dig
12 into some of these issues, it is going to
13 become ratesetting. But I think the
14 Commission could start out with
15 quasi-legislative and make some basic
16 decisions about, you know, where it wants to
17 see changes. And then when we get into the
18 specifics of what those changes might be,
19 shift it over to ratesetting.

20 I think, you know, there are
21 definitely ratesetting issues buried in here.
22 But until we get a little more focused on,
23 you know, what's going to be addressed in
24 detail, it may be premature and give the
25 Commission a little more flexibility to start
26 out with quasi-leg (sic) but keep the need
27 for shifting to ratesetting closely in mind.

28 Thank you.

1 ALJ TRAN: Thank you.

2 Mr. Ron Leibert with the California
3 Manufacturer Technology Association.

4 MR. LIEBERT: Thanks, your Honor. And,
5 again, surprisingly, I agree with Mike
6 Florio.

7 Thank you.

8 ALJ TRAN: Thank you.

9 Ms. Nora Sheriff with the Indicated
10 Shippers.

11 MS. SHERIFF: Thank you, your Honor.
12 The Indicated Shippers support changing the
13 categorization to ratesetting. We agree with
14 Mr. Pedersen for SCGC.

15 ALJ TRAN: Thank you.

16 And finally Dr. Gene Nelson for the
17 Californians for Green Nuclear Power Corp.

18 DR. NELSON: Consistent with our filed
19 opening comments, we strongly agree with the
20 parties that characterized -- that support a
21 ratesetting characterization with the
22 requirement from the beginning for upper
23 disclosure of ex parte communications in the
24 interest of transparency.

25 Thank you, your Honor.

26 ALJ TRAN: Thank you.

27 So this brings us to the end of our
28 PHC. As previously mentioned, the issues

1 that we had discussed earlier will all be
2 addressed in a forthcoming scoping memo. We
3 anticipate issuing that scoping memo within
4 the next 30 days.

5 We are accepting PHC statements for
6 those parties that wish to file additional
7 comments. I will set the reminder that these
8 PHC comments are limited to five pages, and
9 should only be addressing any new comments
10 that your party wishes to make. We should
11 not be reiterating any comments that we have
12 already accepted on the record. We look
13 forward to reading those statements as they
14 come in next week.

15 Thank you for your time today and
16 your patience. We understand that this is
17 not the normal practice for how we ran the
18 PHC. But hopefully it's been as efficient
19 for everyone else.

20 Stay safe and we are adjourned.

21 Thank you.

22 (Whereupon, at the hour of 4:14 p.m.
23 telephonically, the Commission then
adjourned.)

24 * * * * *

25

26

27

28

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, JASON STACEY, CERTIFIED SHORTHAND REPORTER
NO. 14092, IN AND FOR THE STATE OF CALIFORNIA DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 24, 2020.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS MARCH 26, 2020.

A handwritten signature in black ink, appearing to read 'JAS STACEY', written over a horizontal line.

JASON A. STACEY
CSR NO. 14092

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