

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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COMMISSIONER DARCIE L. HOUCK, in attendance, and
ADMINISTRATIVE LAW JUDGE ELAINE C. LAU, presiding

Joint Application of Southern)
California Edison Company (U338E)) PREHEARING
and San Diego Gas & Electric Company) CONFERENCE
(U902E) for the 2021 Nuclear)
Decommissioning Cost Triennial)
Proceeding.) Application
22-02-016

REPORTER'S TRANSCRIPT
Virtual Proceeding
May 2, 2022
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Reported by: Karly Powers, CSR No. 13991

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VIRTUAL PROCEEDING

MAY 2, 2022 - 11:38 a.m.

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ADMINISTRATIVE LAW JUDGE LAU: The Commission will come to order.

This is the Prehearing Conference for Application 22-02-016. This is the Joint Application of Southern California Edison Company, SCE, and San Diego Gas and Electric Company, SDG&E, for the 2021 Nuclear Decommissioning Cost Triennial Proceeding.

Good afternoon. I am Administrative Law Judge ALJ Elaine Lau. With me is Assigned Commissioner, Commissioner Darcie Houck.

The purpose of today's prehearing conference is to discuss the scope of issues, procedural schedule, need for hearings, and the category of this proceeding. We will not make any determinations today regarding these issues. These issues will be determined in the Assigned Commissioner's scoping memo and ruling.

At this time, I would like to turn to Commissioner Houck. She has some opening remarks for us.

COMMISSIONER HOUCK: Thank you, Judge Lau.

1 Just a -- so good afternoon,
2 everyone. As Judge Lau said, my name is
3 Darcie Houck. I'm the assigned Commissioner
4 for this proceeding. I want to thank Judge
5 Lau for facilitating today's hearing, David
6 Zizmor, our Energy Division staff, and my
7 advisor Maryam Mozafari, for all of their
8 work. I also want to thank our IT staff,
9 Joseph Haga, and our court reporter, Karly
10 Powers. We could not be here in our virtual
11 hearing without the work they perform.

12 I want to thank the parties for
13 their participation in the proceeding and
14 their presence at the prehearing conference
15 today. I appreciate the workshop that the
16 Applicant facilitated just prior to the PHC
17 and the additional workshops that have been
18 offered by the Applicant.

19 To set the stage for today's
20 discussion, I want to just make a few
21 statements to put the hearing in context. In
22 accordance with the NR -- Nuclear Regulatory
23 Commission requirements, nuclear power plant
24 operators, or licensees, must provide
25 financial assure- -- assurances that
26 necessary funds for all decommissioning costs
27 for the facility are available. These funds
28 in this case, generally provided through

1 ratepayers, must cover all activities to
2 safely achieve license termination, spent
3 fuel management, and site restoration.

4 In addition to the NRC requirements,
5 California has adopted the California Nuclear
6 Decommissioning Act of 1985, to establish a
7 framework to ensure adequate financial
8 resources for safety commissioning of
9 California's nuclear power plants. The
10 Decommissioning Act mandates the California
11 Public Utilities Commission adopt regulations
12 and guidelines to protect ratepayers and
13 shareholders from decommissioning-related
14 financial risks. To meet this requirement,
15 the Commission conducts its review of nuclear
16 decommissioning costs through this
17 proceeding, the nuclear decommissioning cost
18 triennial proceeding.

19 The duty to furnish and maintain
20 safe equipment in facilities and timely
21 performance of decommissioning work falls
22 squarely on California public utilities, in
23 this case, Southern California Edison and San
24 Diego Gas and Electric. As affirmed in prior
25 decisions, this duty remains with the
26 utilities, regardless of whether
27 decommissioning activities are conducted
28 directly by the utilities, or by entities or

1 individuals that the utilities contract with,
2 to carry out decommissioning activities.

3 The burden of proof is on the
4 utilities to demonstrate that all activities
5 or expenses incurred are reasonable. That
6 said, it's critically important that we
7 ensure the safe closure of these facilities,
8 and that we meet all safety requirements for
9 closure and for the storage and removal of
10 nuclear waste onsite at these facilities.

11 We are going to carefully consider
12 all of the information provided by the
13 parties throughout this proceeding. And I
14 will carefully consider all of the comments
15 received by the parties that are made today
16 during this prehearing conference, as well as
17 the written materials that were filed in
18 advance of prehearing conference before
19 issuing the scoping memo in this matter. And
20 with that, I will conclude my comments; and
21 look forward to hearing from all of the
22 parties today; and turn the proceeding back
23 over to Judge Lau.

24 ALJ LAU: Thank you.

25 Can you guys hear me?

26 Okay. So, at this time, I would
27 liked to go over some ground rules for
28 today's prehearing conference to make this a

1 successful hearing.

2 So, first, is that we have an
3 established speaking order. The speaking
4 order was circulated with my agenda for
5 today's hearing. Given the large amount of
6 the party representatives today, I will be
7 giving parties a prompt for when it's your
8 turn to speak;

9 Number two is, do not speak unless
10 we call on you to speak. Please wait your
11 turn, and do not speak over one another;

12 And, lastly, please put yourself on
13 mute when you're not speaking.

14 All right. So let's start off with
15 the first item on the agenda, which is
16 parties and service list:

17 I would like to -- as a first item,
18 I would like to take appearances for the
19 record. Because of the large amount of party
20 representatives, I will be calling on your
21 party. So if I call on your party, please
22 announce yourself and introduce yourself and
23 your party. The parties that you are
24 representing. So I will start with Southern
25 California Edison.

26 MR. JERMAN: Good afternoon, Judge Lau
27 and Commissioner Houck. This is Ryan Jerman,
28 and I'm appearing on behalf of Southern

1 California Edison.

2 ALJ LAU: San Diego Gas and Electric
3 Company?

4 MR. TRIAL: Good afternoon. My name is
5 Allen Trial, and I'm appearing on behalf of
6 San Diego Gas and Electric.

7 ALJ LAU: Public Advocates Office.

8 MR. ALLEN: Thank you, your Honor.
9 Peter Allen for the Public Advocates Office.
10 After today, my place as Lead Counsel will be
11 taken by Wayne Parker.

12 ALJ LAU: And The Utility Reform
13 Network.

14 MR. FREEDMAN: Matthew Freedman, staff
15 attorney here representing The Utility Reform
16 Network.

17 ALJ LAU: And alliance for nuclear
18 responsibility.

19 MR. GEESMAN: John Geesman, your Honor,
20 representing The Alliance for Nuclear
21 responsibility, also known as A4NR.

22 ALJ LAU: Thank you.

23 That is currently all the parties
24 that we have. I know that there are a few
25 other parties that want to make oral motions
26 for party status; and now is the opportunity
27 for that. So if you wish to make a motion
28 for party status, please first introduce

1 yourself and the organization you're
2 representing. Please also explain the
3 interest your party is having in this
4 proceeding, and also describe your
5 organization.

6 Let's start with Pacific Gas and
7 Electric Company.

8 (Crosstalk.)

9 MS. POST: Can you hear me?

10 ALJ LAU: Yes, I can hear you.

11 MS. POST: Okay. Jennifer Post,
12 representing Pacific Gas and Electric
13 Company. We're moving for party status in
14 this proceeding today.

15 I think, as most parties know,
16 Pacific Gas and Electric Company also has a
17 2021 Nuclear Decommissioning Cost Triennial
18 Proceeding pending. We filed our application
19 in December of 2021. While most issues are
20 distinct as between -- as the SONGS NDCTP and
21 the Diablo Canyon and Humboldt Bay Power
22 Plant NDCTP, we feel it makes sense for us to
23 have party status here to note common issues
24 and participate as necessary.

25 ALJ LAU: All right. Thank you.

26 Are there any objections from
27 parties to PG&E's request?

28 (No response.)

1 ALJ LAU: Hearing none, PG&E's motion
2 for party status is granted.

3 (Pacific Gas and Electric was
4 granted Party Status.)

5 ALJ LAU: Next, I know that we have a
6 pending -- that Public Watchdogs would like
7 to make a motion.

8 MR. LANGLEY: Greetings, I'm Charles
9 Langley, the Executive Director of Public
10 Watchdogs. And we make a motion for party
11 status.

12 Public Watchdogs was incorporated to
13 represent California ratepayers, in part,
14 before the California Public Utilities
15 Commission. And we are a 501c3 non-profit.

16 ALJ LAU: Can you please explain your
17 interest in this proceeding?

18 MR. LANGLEY: Our interest in the
19 proceedings is that we would like to evaluate
20 the decommissioning trust fund budgets that
21 are being put forward in terms of how they
22 affect Southern California Edison and SDG&E
23 ratepayers. And we intend to do so using
24 forensic accounting tools.

25 ALJ LAU: Thank you, Mr. Langley.

26 Any objections to Public Watchdog's
27 request?

28 (No response.)

1 ALJ LAU: All right.

2 Hearing none, Public Watchdogs'
3 party -- motion for party status is granted.

4 (Public Watchdogs was granted Party
5 Status.)

6 ALJ LAU: All parties, including those
7 that were granted party status today, must
8 complete and submit an electronic copy of the
9 Commission's appearance form via e-mail to
10 ALJ_reporting@cpuc.ca.gov and copy to our
11 Process Office. The form was sent to the
12 service list. I sent the form to the service
13 list. If you have any problem accessing the
14 form, please send me an e-mail. If you just
15 want a copy of the transcript, you will also
16 need to fill out the form.

17 Next item on the agenda is the scope
18 of issues. So I circulated my proposed list
19 of scoping issues with the agenda onto the
20 service list last week. What we will do is,
21 I will first read the issues. And after I
22 finish reading the issues, then I will allow
23 parties to comment.

24 So, here are the issues -- first,
25 are the issues that apply to both applicants:

26 One, are the costs incurred for the
27 San Onofre Nuclear Generating Station, SONGS,
28 Unit 1 decommission projects that were

1 completed from January 1, 2018, through
2 December 31st, 2020, also known as the 2018
3 to 2020 review period, and the undistributed
4 expenditures incurred during the 2018 to 2020
5 period reasonable?

6 What is the reasonable share of the
7 costs for Edison; what is the reasonable
8 share of costs for SDG&E.

9 Two, are the costs incurred for
10 SONGS Unit 2 and 3 projects during the 2018
11 through 2020 review period and the
12 undistributed expenditures incurred during
13 the 2018 to 2020 review period reasonable?

14 What is the reasonable share for --
15 of the costs for Edison; and what is the
16 reasonable share of the costs for SDG&E?

17 Three, is the 2020 decommissioning
18 cost estimate, DCE, for SONGS Unit 1
19 reasonable? If not, what is reasonable
20 amount? What is the reasonable share of the
21 cost for Edison? What is the reasonable
22 share of the cost for SDG&E?

23 Four, is the F -- is the 2020 DCE
24 for SONGS Units 2 and 3 reasonable? If not,
25 what is the reasonable amount? What is the
26 reasonable share of the costs for Edison?
27 What is the reasonable share of the costs for
28 SDG&E?

1 Five, should the litigation proceeds
2 from the United States Department of Energy,
3 DOE, to SONGS be deposited into the
4 non-qualified nuclear decommissioning trusts
5 of each applicant; or be refunded to the
6 Applicant's customers through each of their
7 individual Energy Resource Recovery Accounts
8 proceedings?

9 Six, are the applicants compliant
10 with prior Commission decisions?

11 Seven, is the 2021 reasonableness
12 framework as proposed by the applicants
13 reasonable? If not, what modifications
14 should be done -- should be made?

15 And the next two issues pertain only
16 to Southern California Edison:

17 One, is Edison's 2019 DCE for the
18 Palos Verdes nuclear generating station,
19 Units 1, 2, and 3 reasonable? If not, what
20 is the reasonable amount?

21 Two, what are reasonable amounts of
22 annual contributions to SONGS Unit 1, SONGS
23 Unit 2 and 3, and Palos Verdes nuclear
24 generating stations -- nuclear
25 decommissioning trusts for Edison?

26 Sorry. That was a handful.

27 And, lastly, this issues only
28 pertains to SDG&E:

1 What are reasonable amounts of
2 annual contributions to the SONGS Unit 1 and
3 SONGS Units 2 and 3 nuclear decommissioning
4 trusts for SDG&E?

5 So that is all the issues I have
6 listed for this application. Now I will call
7 on parties using the established speaking
8 order. And now is the chance for parties to
9 comment on my proposed list of scoping
10 issues.

11 Please, again, only speak after I
12 call upon your party. I also ask that you
13 introduce yourself again after I call on you.
14 If you don't have any comment, you may pass.
15 Depending on time, we may also allow for one
16 round of comments -- or responses to
17 comments.

18 So, I will start with Edison.

19 MR. JERMAN: Yes. Thank you, your
20 Honor. This is Ryan Jerman on behalf of
21 Edison --

22 (Reporter clarification.)

23 MR. JERMAN: I apologize. Can you hear
24 me now? All right.

25 Okay. This is Ryan Jerman on behalf
26 of Edison. Judge Lau, we do not object to
27 the list of scoping issues that you just ran
28 through. I would note that we submitted a

1 report of the meet-and-confer meeting where
2 the parties agreed that the scope of the
3 proceeding should be issues identified in the
4 application, as well as the protests that
5 were filed. And the list of scoping issues
6 that you just read appears to encompass all
7 of those issues. So, again, Edison does not
8 object to the scoping issues you just read.

9 ALJ LAU: Thank you, Mr. Jerman.

10 How about SDG&E?

11 MR. TRIAL: Thank you, your Honor.

12 This is Allen Trial for SDG&E. SDG&E agrees
13 with the scoping issues as cited, with the
14 exception of underneath the "SDG&E only
15 scoping issues," it appears that we need to
16 add to.

17 The first being, "Are the
18 expenditures incurred by SDG&E for SDG&E-only
19 costs during the 2018-2020 review period
20 reasonable?"

21 The second being, "Is the
22 decommissioning cost estimate for SDG&E-only
23 cost reasonable?"

24 ALJ LAU: I'm sorry. Can you -- so is
25 there two additional issues that you would
26 like to add to the scope of issues for SDG&E?
27 -- is that correct?

28 MR. TRIAL: Correct. They have to do

1 with the SDG&E costs -- the only costs for
2 SDG&E.

3 The first one I'll repeat again. It
4 would be, "Are the expenditures incurred by
5 SDG&E for SDG&E-only costs during the
6 2018-2020 review period reasonable?"

7 And --

8 ALJ LAU: Yeah. And can you repeat
9 number two?

10 MR. TRIAL: Number two? Yes.

11 Number two is, "Is the
12 decommissioning cost estimate for SDG&E-only
13 costs reasonable?"

14 ALJ LAU: Okay. Thank you, Mr.
15 Trial --

16 MR. TRIAL: Thank you, your Honor.

17 ALJ LAU: -- for that clarification.

18 Next we have Public Advocates
19 Office.

20 MR. ALLEN: Thank you, your Honor.
21 Peter Allen for the Public Advocates Office.

22 Public Advocates Office had raised
23 the issues somewhat differently than your
24 ruling. I mean, I'm understanding that the
25 scope of those is the same. Public Advocates
26 had specifically spelled out a couple of
27 narrow issues.

28 One of those, whether the Commission

1 should approve SCE's recorded costs
2 associated with the August 3rd, 2018 canister
3 (inaudible) incident, and whether the
4 Commission should approve SCE's recorded
5 costs associated with the additional
6 excavation associated with the containments
7 substructure. Assuming that those issues,
8 and the issues that Public Advocates has
9 identified, are subsumed within your
10 rephrasing, we have no objection to those.
11 We just want to make sure that the rephrasing
12 does not actually limit or narrow the issues
13 from what Public Advocates identified in its
14 protest.

15 And then as a second matter, we have
16 no objection to Mr. Trial's recommended
17 additional issues.

18 ALJ LAU: Thank you, Mr. Allen.

19 I believe those two issues that
20 Public Advocates raised during protests would
21 be subsumed under number two, "Are the costs
22 incurred for SONGS Units 2 and 3 projects
23 incurred during the review period
24 reasonable?"

25 MR. ALLEN: Thank you, your Honor.

26 ALJ LAU: Thank you.

27 Next, we have The Utility Reform
28 Network.

1 MR. FREEDMAN: Thank you, your Honor.
2 Matt Freedman on behalf of The Utility Reform
3 Network. We do not anticipate having any
4 concerns about the scope outlined here. I
5 would note that to the extent that there are
6 any completed projects that were completed at
7 San Onofre during the 2018-2020 period, it's
8 my understanding that there might be some
9 cost that actually pre-date 2018, but they
10 are included in the project that was
11 completed during the window. I would assume
12 based on the former reasonableness framework
13 that was approved, that it's the completed
14 projects occurring during this period that
15 are the ones that we are reviewing for
16 reasonableness in the proceeding, and that
17 parties would be able to comment on and take
18 issue with. So that might be the only
19 clarification I would offer.

20 ALJ LAU: So, Mr. Freedman, are you
21 saying that there are costs that would be
22 incurred outside the reasonable -- the review
23 -- the 2018 to 2020 review period that would
24 be subject to review in this application?

25 MR. FREEDMAN: Well, it's my
26 understanding that completed projects under
27 the reasonableness framework might include
28 costs that were incurred prior to 2018, but

1 for a project that was completed during this
2 timeframe.

3 ALJ LAU: Okay. So it would be
4 incurred before 2018, but completed within
5 the timeframe? I guess I can -- I can add
6 number seven as in "Are costs incurred under
7 the 2021 reasonableness timeframe
8 reasonable?" Or, you know, I would have to
9 think of better wording for it. But the --
10 would that alleviate your concern?

11 MR. FREEDMAN: Yes, your Honor, I
12 believe so. I would be interested in
13 Edison's response on this one.

14 But there are both distributed and
15 undistributed costs. The undistributed costs
16 are the ones that would be incurred during
17 this timeframe, 2018 to 2020. But
18 distributed costs for completed projects
19 could include costs that were incurred prior
20 to 2018. But the project itself would have
21 been completed during this time frame, and
22 then eligible for review; unless I'm
23 misunderstanding.

24 ALJ LAU: Okay. Thank you, Mr.
25 Freedman.

26 We can go back to Edison after we
27 hear from the other two parties -- other
28 three parties. Excuse me.

1 Anything further, Mr. Freedman?

2 MR. FREEDMAN: No, your Honor. We
3 believe that the outlined scope, as I read
4 it, is intended to capture all the relevant
5 issues that TURN intends to address.

6 ALJ LAU: Okay. Thank you.

7 Mr. Geesman, A4NR?

8 MR. GEESMAN: Thank you, your Honor.
9 John Geesman on behalf of the Alliance for
10 Nuclear Responsibility. We have nothing to
11 add to your suggested scoping of the issues.

12 We agree with the way in which
13 Mr. Jerman characterized them in the joint
14 report he filed;

15 We agree with Mr. Freedman's
16 description of the accrual method of project
17 accounting here;

18 And we agree with Mr. Trial's
19 suggested additions to the scope.

20 Other than that, we have nothing to
21 add.

22 ALJ LAU: Thank you Mr. Geesman.

23 PG&E?

24 MS. POST: Hi there, it's Jennifer Post
25 for PG&E.

26 PG&E doesn't have anything to add
27 with regard to scope. We agree with the
28 scope as stated and written.

1 ALJ LAU: Thank you, Ms. Post.
2 Public Watchdogs?

3 MR. LANGLEY: Your Honor, we have no
4 objections to the scope.

5 I do wish to add though that I
6 neglected to mention that we will be relying
7 on some extensive staff experience with large
8 construction projects. My staff member, Nina
9 Babiarz, has actually had experience
10 constructing stadiums and master-planned
11 communities for 20 years. And, in addition,
12 we'll be using outside expert testimony from
13 people such as Paul Blanch, who you may have
14 already heard from today.

15 ALJ LAU: Okay. All right. Thank you,
16 Mr. Langley.

17 At this time, can we ask if Edison
18 -- if you would like to respond to, first,
19 the addition of SDG&E's request to added
20 scope of issues, those two issues? And can
21 you also respond to Mr. Freedman's concern
22 regarding costs that are incurred prior to
23 2018, but would be -- would not be
24 recoverable in this application -- or subject
25 for recovery in this application through the
26 2021 reasonableness framework?

27 MR. JERMAN: Thank you, your Honor.
28 This is Ryan Jerman with Southern California

1 Edison.

2 We have no objection to the two
3 additional issues that Mr. Trial raised.
4 Thank you Mr. Trial for identifying those
5 two.

6 With regard to Mr. Freedman's
7 question, I think Mr. Freedman framed it
8 correctly that there are costs incurred prior
9 to the review period, but associated with
10 projects that were completed during the
11 review period. I think the way your Honor
12 has framed the scoping issues, that they
13 encompass such costs as Mr. Freedman
14 identified. So I don't think we need an
15 additional scoping issue, because what you've
16 written subsumes the costs that Mr. Freedman
17 identified. But -- but, again, we agree with
18 his framing of the issue.

19 ALJ LAU: So you believe it's subsumed
20 under Issue 1 and 2?

21 MR. JERMAN: Yes.

22 ALJ LAU: Okay.

23 Mr. Freedman, do you agree?

24 MR. FREEDMAN: Your Honor, I think that
25 one way to resolve this might be to use the
26 language on Item Number 1, and to bring that
27 into Item 2. So, Scope of Issue 1
28 specifically references decommissioning

1 projects that were completed --

2 ALJ LAU: Okay.

3 MR. FREEDMAN: -- January 1, 2018,
4 through December 31, 2020. But Item Number 2
5 does not use that same language. It does not
6 refer to decommissioning projects that were
7 completed.

8 Perhaps, simply using the same
9 language in Items Number 1 and 2 could be the
10 solution here to avoid any ambiguity or
11 suggestion that there's a different approach
12 being taken with respect to SONGS 1 and SONGS
13 2 and 3.

14 ALJ LAU: Okay. I will make these
15 modifications and suggest it to the
16 Commissioner. Thank you for these
17 suggestions.

18 All right. Are there any other
19 concerns regarding scope of issues?

20 Please, you know, introduce yourself
21 and your party if you want to speak.

22 (No response.)

23 ALJ LAU: Hearing none, thank you.

24 Thank you, parties, for your
25 comments. We will take your comments into
26 consideration. But the final determination
27 will be set in the Assigned Commissioner's
28 scoping memo.

1 Next item on the agenda is
2 categorization and need for hearing.
3 Resolution ALJ 176-3504, which the Commission
4 issued on March 17th, 2022, determined that
5 this is a ratesetting proceeding. Parties
6 generally agree on this categorization. I
7 also agree to this categorization and will
8 make this recommendation to Commissioner
9 Houck. But, again, the final determination
10 will be made in the Assigned Commissioner's
11 scoping memo.

12 As for whether hearings are needed,
13 parties generally agree that hearings are
14 needed. I agree, as well, and will make that
15 recommendation to Commissioner Houck. But
16 the final determination will be made in the
17 Assigned Commissioner's scoping memo.

18 At this moment, I ask parties if you
19 have any comment on the categorization of
20 this proceeding or the need for hearings,
21 please introduce yourself and your
22 organization before you speak.

23 (No response.)

24 ALJ LAU: Hearing none, let's move on
25 to the proceeding schedule.

26 So, the agenda I circulated includes
27 a proposed proceeding schedule. And that
28 proceeding schedule is basically the schedule

1 that parties served as part of the
2 meet-and-confer report. But in reviewing
3 testimony, I saw the Applicant's request to
4 update their nuclear decommissioning costs,
5 or nuclear decommissioning trust fund
6 balances, during the course of the
7 proceeding. And I did not see that in the
8 parties' proposed schedule. And I would want
9 to hear if parties want to add that as a date
10 and -- as well as a date for comments and
11 responses to the update.

12 And I -- and I'm not sure if all the
13 parties would like to comment. So I would
14 just open it to the floor. And if you want
15 to speak, please raise your hand, introduce
16 yourself and your organization before you
17 speak.

18 (No response.)

19 ALJ LAU: How about I ask Mr. Jerman,
20 Edison, since you're -- as one of the
21 applicants, I -- I did not see included in
22 the proceeding schedule a date for the
23 update; and I saw that in testimony.

24 MR. JERMAN: Yeah. Thank you, your
25 Honor. I believe what we stated in testimony
26 was if parties wanted it, we would provide an
27 update. So I'll listen to the discussion
28 here. And I'll take my -- put myself on mute

1 while other folks weigh in. And if I could
2 have a minute to discuss with Jose Perez,
3 who's in the room with me, that would be
4 great.

5 ALJ LAU: Okay. Thank you.

6 Parties, would you have any
7 comments?

8 Mr. Freedman.

9 MR. FREEDMAN: Thank you, your Honor.
10 Matt Freedman on behalf of TURN. We would
11 not object to an updating of the trust fund
12 balances, so long as it's done consistent
13 with past practice, using
14 end-of-calendar-year dates. Typically, the
15 update is done as of December 31st. And so,
16 whatever that balance was, you know, the
17 update is -- would be acceptable to us. If
18 there's a December 31st, 2022, update that
19 Edison would seek to put in, that would be
20 acceptable as well.

21 ALJ LAU: Thank you, Mr. Freedman.

22 Mr. Allen?

23 MR. ALLEN: Thank you, your Honor.
24 Peter Allen for Public Advocates.

25 We would have no objection to an
26 update of the balance. I don't believe that
27 it necessarily needs to be built into the
28 procedural schedule.

1 ALJ LAU: Thank you.

2 Mr. Geesman.

3 MR. GEESMAN: Your Honor, this is not
4 an issue we expect to get drawn into; but we
5 do think the better practice would be to
6 allow the update, as we've done in past
7 proceedings.

8 ALJ LAU: Thank you, Mr. Geesman.

9 Mr. Allen or Mr. Jerman -- or I
10 think Mr. Jerman is still consulting with his
11 team.

12 Mr. Geesman, can you lower your
13 hand? Thank you.

14 Let's go off the record while Mr.
15 Jerman is still consulting.

16 (Off the record.)

17 ALJ LAU: Okay. Let's go back on the
18 record.

19 Mr. Jerman.

20 MR. JERMAN: Okay. Yeah. Thank you
21 for a few minutes. I was discussing with Mr.
22 Perez.

23 So we can certainly update our
24 numbers as of the end of 2021. So we could
25 update fund balances, escalation rates -- and
26 it would take us, we think, a couple of
27 months to put that information together. But
28 we certainly wouldn't have any objection to

1 ding that. And, again, that would be the
2 fund balances, and known information, as of
3 the end of 2021.

4 ALJ LAU: I think Mr. Freedman asked
5 for the end of 2022, if that is available.

6 MR. JERMAN: So that -- right. That
7 would not be available until the end -- once
8 we get to the end of 2022. And then it would
9 still take some time after that to put that
10 information together. And the problem then
11 is that we'd run into the hearings.

12 So I -- I think -- the update we
13 could certainly agree to would be to provide,
14 you know, much sooner, updates as of the end
15 of 2021.

16 ALJ LAU: Okay. And that would be
17 before hearings?

18 MR. JERMAN: Yes, well before hearings.
19 And, like I said, I think we can put that
20 together in two months.

21 ALJ LAU: Okay.

22 And then, would parties want to
23 comment on those updates?

24 Mr. Freedman?

25 MR. JERMAN: And I'm --

26 (Crosstalk.)

27 MR. FREEDMAN: Your Honor, Matt
28 Freedman on behalf of TURN.

1 Just to clarify, TURN is not making
2 a request that Edison update its fund
3 balances at the end of 2022. I was -- the
4 purpose of my comment was to simply say that
5 any updates should be limited to end of the
6 calendar year, to the extent that Edison
7 wishes to provide them. So we're fine with
8 the update for the end of 2021 balances, as
9 proposed by Mr. Jerman. No problem from our
10 perspective.

11 We do not believe that there should
12 be some kind of a comment date around the
13 update. We think that that can be addressed
14 in testimony under the schedule that's been
15 proposed.

16 ALJ LAU: Mr. Allen?

17 MR. ALLEN: Thank you, your Honor.
18 Peter Allen for Public Advocates.

19 I would agree with Mr. Freedman's
20 comments. I don't believe there's a need for
21 separate comments on the update.

22 ALJ LAU: Okay.

23 So then, Mr. Jerman, you said that
24 you would provide the update prior to
25 intervenor testimony --

26 (Crosstalk.)

27 MR. JERMAN: Yes.

28 ALJ LAU: Okay --

1 MR. JERMAN: Yes. And if --

2 ALJ LAU: All right.

3 (Crosstalk.)

4 MR. JERMAN: -- dates, just looking at
5 the calendar, we could provide the updates by
6 the end of July -- so July 29th.

7 ALJ LAU: Okay. So parties -- if
8 parties all agree that the end of the July
9 would be a good date, and that doesn't need
10 to be built into the proceeding schedule, I
11 will just have Edison provide it at the end
12 of July without adding it to the proceeding
13 schedule.

14 If parties have any comment, now is
15 the time to raise your hand.

16 (No response.)

17 ALJ LAU: Hearing none, are there any
18 concerns regarding the proceeding schedule?
19 Any concerns and suggestions as to what is --
20 should be different than the one that I
21 circulated in the agenda?

22 (No response.)

23 ALJ LAU: All right. Hearing none --

24 MR. JERMAN: Judge -- I'm sorry.

25 ALJ LAU: Mr. Jerman --

26 MR. JERMAN: I'm sorry. Just one point
27 of clarification.

28 On the updates that we just

1 discussed to the fund balances, there are
2 separate balances for SCE and SDG&E. So just
3 to clarify, the request was just for SCE to
4 update the fund balances with information
5 through the end of 2021? And I guess that's
6 a question, is -- is that the request? And
7 if there's also a request for San Diego, I
8 just wanted to raise that that would not be
9 included within the request for SCE to update
10 its information as of the end of 2021.

11 ALJ LAU: I -- I only raised that issue
12 because I read that it -- as a request in
13 either Edison's testimony or SDG&E's
14 testimony. And I just wanted to flag it for
15 discussion.

16 Commissioner Houck, has some
17 comments.

18 COMMISSIONER HOUCK: I just wanted to
19 ask if SDG&E is also able to update their
20 trust, as well, if SCE is?

21 ALJ LAU: Mr. Allen (sic), do you need
22 a couple minutes to consult with your team.

23 MR. TRIAL: No, I'm not in any position
24 to consult with my team. I -- Sue will
25 e-mail, so will Tracy, because I'm at the
26 CCPUC Conference.

27 ALJ LAU: Can you repeat that? I
28 didn't catch you -- what you said.

1 MR. TRIAL: I will try and allow my
2 team to e-mail me to give me that answer.
3 But I'm not at liberty to consult with them
4 at the moment. I'm at the CCPUC Conference.
5 They are not in the room with me.

6 ALJ LAU: Okay. So --

7 MR. TRIAL: I just got a response from
8 Sue that we can do that at the same time.

9 ALJ LAU: Okay. So SDG&E will also
10 provide the fund balance --

11 MR. TRIAL: Yes.

12 ALJ LAU: -- at the end of July?

13 MR. TRIAL: Yes, your Honor.

14 ALJ LAU: All right. Thank you.

15 Any other concerns or questions
16 regarding proceeding schedule?

17 (No response.)

18 ALJ LAU: All right.

19 So I just want to confirm that
20 Intervenor Testimony would be due on
21 September 23rd, 2022;

22 Rebuttal Testimony would be due on
23 November 14th, 2022;

24 Evidentiary hearings -- which that
25 has to be confirmed. But we would
26 tentatively pencil in January 18th to 20 of
27 2023;

28 Opening Briefs due February 17th,

1 Reply Briefs March 17th of 2023.

2 And do those dates work? Any
3 concerns with those dates?

4 (No response.)

5 ALJ LAU: Okay. Hearing none, then I
6 will -- let's move on to the next item on the
7 agenda.

8 And, as I circulated the agenda last
9 week, I did ask parties to take a quick look
10 at some of the questions I posed in the
11 agenda. And so, at this juncture, I would
12 like to discuss consolidation with PG&E's
13 2021 Nuclear Decommissioning Cost Triennial
14 Proceeding. That is Application 21-12-007.

15 There are currently two separate
16 applications filed at the Commission for 2021
17 Nuclear Decommissioning Costs. In the past,
18 these nuclear decommissioning cost triennial
19 proceedings have been consolidated. But they
20 have also been addressed separately.

21 So, at this time, I ask that parties
22 comment on the following three questions:

23 One, should this proceeding be
24 consolidated with PG&E's 2021 Nuclear
25 Decommissioning Costs Triennial Proceeding?

26 Two, what are the advantages and
27 disadvantages of consolidating the two
28 proceedings?

1 Three, are the issues of facts or
2 law in these two proceedings generally
3 similar or related, such that consolidating
4 these two proceedings would be more efficient
5 or appropriate?

6 Again, we will use the established
7 speaking order. I will call on parties. And
8 please respond only if I call on your party.

9 First, we have Edison.

10 MR. JERMAN: Yes. Ryan Jerman for
11 Edison. Edison opposes consolidating the two
12 proceedings. The issues in the two
13 proceedings are very different.

14 Let me first note that the two
15 proceedings have not been consolidated since
16 SONGS 2 and 3 ceased operations in 2013. The
17 DCEs for the two proceedings are very
18 different. The sites themselves are very
19 different, the sites the plants are on. As
20 an example, the SONGS site is on land that's
21 controlled by the Navy and the California
22 State Lands Commission.

23 The decommissioning timings for the
24 facilities are very difference. And we also
25 don't believe that there would be any
26 efficiencies for consolidating the two
27 proceedings. The procedural schedule that
28 was stipulated to in this proceeding, and

1 that was included in your agenda, your Honor,
2 is four or five months behind the procedural
3 schedule that was ordered in the PG&E
4 proceeding. And there are also different
5 parties between the two proceedings as well.

6 So, for all those reasons, Edison is
7 opposed to consolidating. And let me finally
8 note, as well, that we filed comments in
9 opposition to consolidation in the PG&E
10 NDCTP. And we continue to rely on those
11 comments. And we would incorporate those
12 comments in opposition to consolidation here
13 in this proceeding, as well.

14 ALJ LAU: Thank you, Mr. Jerman.

15 SDG&E?

16 MR. TRIAL: Your Honor, Allen Trial for
17 SDG&E.

18 SDG&E would be opposed to the
19 consolidation for many of the same reasons
20 that Mr. Jerman raised for Edison. Under
21 Rule 7.4, we do not believe that the
22 questions of law and fact are related,
23 specifically for the site-specific reasons
24 that are involved with each plant. I would
25 also specifically state that the contractors
26 involved, the work scope involved, the
27 technology, the design of the plants, all
28 weigh in favor of not consolidating. I

1 believe that it would lead to a protracted
2 schedule, which we do not wish to have.

3 Thank you.

4 ALJ LAU: Thank you, Mr. Trial.

5 Public Advocates Office?

6 MR. ALLEN: Thank you, your Honor.

7 Peter Allen for Public Advocates Office.

8 Public Advocates Office does not
9 have a strong position on this issue. We may
10 have a slight preference for consolidation,
11 with the caveat that we would want any
12 reconciliation of the schedules to be on the
13 one we've established for this proceeding.
14 In other words, the PG&E proceeding would
15 have to slow down, rather than having this
16 one speed up to match the schedule of the
17 PG&E one.

18 We believe there are some similar
19 legal issues, but acknowledge that the
20 factual issues aren't that quite different.
21 So, with that, we do not have a strong
22 preference for either consolidation or
23 continuing to keep them separate. Either one
24 would be acceptable to Public Advocates.

25 ALJ LAU: Thank you, Mr. Allen.

26 Mr. Freedman?

27 MR. FREEDMAN: Thank you, your Honor

28 Matt Freedman on behalf of TURN.

1 We support consolidation. And we
2 think it can occur while preserving the
3 schedules that have been set out in both
4 proceedings. We do not believe that a
5 consolidation should require common dates for
6 testimony and hearings. Consolidated
7 proceedings have often had different phases
8 to address different issues, and we think
9 this is one where that could be the case.

10 The Commission has, in the past, in
11 the 2009 and 2012 nuclear decommissioning
12 cases, consolidated those applications. That
13 consolidation occurred, despite that fact
14 that every site that was included in the
15 consolidated application was different, faced
16 different factors, had different technology.
17 One of the facilities during the -- that
18 period, Humboldt Bay, was shut down and
19 undergoing active decommissioning.

20 So the factors that have been raised
21 by the utilities today are the same factors
22 that would have applied in 2009 and 2012.
23 And the utilities routinely argue that --
24 regardless of consolidation, they argue that
25 the Commission should not -- should look at
26 significant differences between sites and
27 that you cannot compare any site to any other
28 site. This is a common argument that we

1 hear.

2 I don't think that's relevant for
3 purposes of considering whether consolidation
4 is warranted. The reality is that all of
5 these facilities are subject to the exact
6 same provisions of Federal law, the exact
7 same provisions of Federal regulations, the
8 exact same provisions of State law, and the
9 exact same provisions of State regulation.
10 There is no difference.

11 The primary benefit to
12 consolidation, in TURN's view, is a single
13 evidentiary record that can be used by the
14 parties, ensuring that the Commission is able
15 to consider all relevant facts from both
16 cases. Because there are many common issues
17 of fact and law that come up. And there is
18 an important need for the Commission to be
19 comparing the efforts of all utilities, with
20 all of their nuclear facilities, given the
21 importance of this effort.

22 So we think that a common
23 evidentiary record is the goal here. We
24 think that the common issues of law are
25 indisputable. And we don't see disadvantages
26 in the event that the procedural schedules
27 are not adjusted, relative to what's been
28 proposed today and what's been adopted in the

1 PG&E case. We also don't believe the
2 consolidation under that framework would
3 infringe upon the right of any party to
4 address any issue it wants that is within the
5 scope of either proceeding.

6 So, that's our perspective. We
7 think it would be a helpful improvement to
8 the process.

9 ALJ LAU: Mr. Freedman, can I ask for a
10 point of clarification? Can you point to
11 some examples of issues of fact or law -- or
12 fact and law that would be similar related,
13 and that would achieve efficiency if
14 addressed in a consolidated proceeding?

15 MR. FREEDMAN: Well, for example, your
16 Honor, in the last cases, the 2018 NDCTPs, we
17 ended up litigating in one case and settling
18 in another case over the issue of the
19 Governor's executive order that deals with
20 the requirements for clean uncontaminated
21 materials that are being landfilled from
22 nuclear sites, and whether they are or are
23 not allowed to go to in-state landfills. And
24 we had an odd situation where we settled on a
25 particular treatment in one case that was
26 adopted by the Commission; and that exact
27 same issue raised in the other case was found
28 to be out of scope by the Commission. This

1 led to -- and that was in the final decision.

2 This led to some weird
3 discontinuities between the two proceedings.
4 And it's a common issue of state law that has
5 a material impact on the some of the
6 assumptions relating to the decommissioning
7 of all nuclear facilities located within the
8 State of California. We think that an issue
9 like that would benefit from being addressed
10 in a consolidated proceeding. So that's just
11 one example I can offer that applies to State
12 law.

13 ALJ LAU: Thank you, Mr. Freedman.

14 Mr. Allen, if you have any examples
15 too, you know, that would be helpful.

16 MR. ALLEN: I'm sorry, your Honor. You
17 were asking me of examples of?

18 ALJ LAU: Issues of -- common issues of
19 law that you alluded to earlier between the
20 two different --

21 (Crosstalk.)

22 MR. ALLEN: Oh, I think -- in general,
23 I would echo Mr. Freedman's comments on that,
24 that the law that governs the decommissioning
25 for these different units is the same; right?
26 It's the Federal laws and regulations. It's
27 the State laws and regulations. Those are,
28 in fact, all the same. The issues that

1 distinguish the two, raised by Mr. Trial and
2 Mr. Jerman are the factual issues as to
3 whether there are substantial issues and
4 factual differences.

5 So to that extent, you know, I
6 believe Mr. Freedman has a valid point that
7 this is exactly the same laws; the legal
8 issues are the same; the factual issues may
9 vary. The question is, in applying the law
10 to the facts, whether it's enough to make it
11 need a separate proceeding or not. Public
12 Advocates does not have a strong preference.
13 We can see this going easily either way,
14 either separate proceedings or consolidated.

15 I think Mr. Freedman raises a good
16 point about having some consistency as a
17 result, and in the approach, and certainly in
18 the scope of issues to be addressed. So,
19 hopefully, if the Commission and the assigned
20 office and assigned ALJs can coordinate well
21 enough, we can avoid that kind of disconnect
22 in these proceedings, if they are separate;
23 or, as Mr. Freedman suggests, if they are
24 consolidated, then that would certainly help
25 prevent that kind of inconsistency happening.

26 ALJ LAU: Okay. Thank you, Mr. Allen.

27 How about Alliance for Nuclear
28 Responsibility?

1 MR. GEESMAN: Thank you, your Honor.
2 John Geesman on behalf of the Alliance for
3 Nuclear Responsibility. We don't have any
4 objection to consolidation.

5 And as we pointed out in our
6 comments in the PG&E proceeding, we do intend
7 to pursue an issue that we think is
8 overwhelmingly of common fact and law, in
9 both proceedings, having to do with use of
10 the DOE litigation proceeds. For a long
11 number of years -- and I believe it dates
12 back to the 2012 NDCTP proceeding, which was
13 in fact consolidated -- A4NR has raised
14 concerns about the nature of the utility
15 estimates for how long spent nuclear fuel
16 will remain onsite. It's been our position
17 that those estimates have been based on
18 arbitrary assumptions often, simply, provided
19 by the nuclear energy institute, a trade
20 association, to assure some commonality
21 within the industry.

22 We believe, and have argued in front
23 of the Commission unsuccessfully, that The
24 Nuclear Decommissioning Act of 1985 requires
25 more scrutiny than the utilities have
26 provided to those spent fuel storage
27 assumptions, and that the Commission cannot
28 find the trusts to be adequately funded if

1 the spent nuclear fuel storage has not been
2 adequately funded. Accordingly, it's our
3 intent to pursue the recommendation Edison
4 has made in its testimony in the PG&E
5 proceeding.

6 In our judgment, the Edison
7 testimony reflects a position that A4NR has
8 advocated for a long number of years. And
9 that is that the litigation proceeds be kept
10 within the decommissioning trust. So, it
11 presents a scheduling challenge.

12 And I think Mr. Freedman -- or I'm
13 not certain if it was Mr. Trial or Mr. Jerman
14 raised a scheduling question. Because in
15 this instance, we'll be pursuing, and putting
16 forward, the Edison recommendation as our own
17 in the PUC proceeding four months before
18 Edison's testimony will be subject to
19 hearings in the SONGS proceeding. Because of
20 that dichotomy, we acknowledged in our
21 comments in the PU -- or in the PG&E
22 proceeding that it wasn't clear what
23 efficiencies could be gained from
24 consolidation. But we do agree with
25 Mr. Freedman. You very much need to reach a
26 consistent result in both cases.

27 And, perhaps, Mr. Allen is correct
28 that, simply, careful coordination between

1 the two ALJs will enable that. As a
2 consequence, our position on consolidation is
3 a little bit nuanced. We have no objection.
4 And we're certainly open to it. But the
5 scheduling questions do raise issues of
6 efficiency.

7 ALJ LAU: Great. Thank you,
8 Mr. Geesman.

9 PG&E?

10 MS. POST: Thank you, Judge Law.

11 PG&E opposes consolidation, as we
12 indicated in the pleading that we filed on
13 April 29, in the docket for PG&E's NDCTP.
14 While the proceedings have been consolidated
15 in the years past, that was when the
16 utilities similarly used estimates of
17 decommissioning that weren't site-specific.
18 In the years since, when we've had separate
19 NDCTP proceedings, that's been because the
20 utilities each submitted site-specific
21 decommissioning cost estimates; in PG&E's
22 case, both for Humboldt and for Diablo
23 Canyon.

24 Additionally, I -- I guess, I
25 confess I'm a little bit confused as to how
26 consolidation would work with separate
27 schedules that are four to five months apart.
28 PG&E is pleased with the schedule as it's

1 been set forth. And it fits with other
2 proceedings that are going on for us. And we
3 would not want -- we would oppose revising
4 the schedule that's been established for our
5 proceeding to be consistent with the schedule
6 that's been set forth today, at least, and in
7 the meet-and-confer statement by the parties
8 for this proceeding.

9 The other issue is that we have
10 different parties who are participating in
11 the proceeding. In PG&E's proceeding, we
12 have Women's Energy Matters, we have
13 (inaudible) council, and whose interest in
14 PG&E -- PG&E's NDCTP are not also represented
15 in the SONGS NDCTP, at least not as far as I
16 know. For example, we have the Diablo Canyon
17 decommissioning engagement panel, which A4NR,
18 WEM, and NCTC seem to be quite interested in
19 our case.

20 I agree that the law is the same for
21 both -- for all nuclear facilities, the
22 Federal law and the State law. I agree it
23 would be really helpful to have the
24 Commission opine as to the applicability of
25 Governor's Order on nuclear waste disposal,
26 and whether waste from nuclear facilities can
27 be disposed of in-state. I don't think you
28 need to consolidate the proceedings in order

1 to do that. You can issue -- as other
2 parties have stated, the Commission can issue
3 decisions -- consistent decisions on issues
4 of common law in each of the proceedings
5 without consolidating the proceedings.

6 And for those reasons, and the
7 reasons cited by SCE and SDG&E, PG&E
8 continues to oppose consolidation.

9 ALJ LAU: Thank you, Ms. Post.

10 Public watchdogs.

11 MR. LANGLEY: Thank you, your Honor.

12 Public Watchdogs objects on the
13 grounds that while the laws may be the same,
14 the substance of the issues are not
15 identical. And one significant difference
16 between Southern California Edison and
17 Pacific Gas and Electric is that on
18 August 3rd, there was a near-miss canister
19 drop. And this resulted in a one-year delay
20 at San Onofre.

21 And a one-year delay in a major
22 construction project is incredibly costly.
23 And I think that is a major difference that
24 really ought to be explored, especially if
25 you intend to consolidate and compare one to
26 the other. Unless that is done, it's really
27 like comparing an apple to an orange.

28 Thank you.

1 ALJ LAU: Thank you, Mr. Langley. At
2 this time, I -- Commissioner Houck has some
3 comments.

4 COMMISSIONER HOUCK: Sorry. I just
5 have a question for the parties.

6 Do you see any concern regarding the
7 application and implementation of the common
8 milestones having any problems with the
9 proceedings not being consolidated in regards
10 to how those may be interpreted, given
11 different records; or any shifts in how those
12 milestones may be applied in the different
13 proceedings?

14 ALJ LAU: Mr. Freedman?

15 MR. FREEDMAN: Thank you, your Honor.
16 Matt Freedman on behalf of TURN.

17 Commissioner, I don't see the
18 milestone frameworks as being an issue where
19 we would intend to -- where consolidation is
20 going to be important. Because the
21 milestones are different for each utility.
22 There's a different framework, although they
23 are comparable, and TURN has obviously been
24 very involved in the frameworks. We don't
25 see that consolidation is necessary for that
26 particular purpose. We think it's generally
27 more applicable for purposes of having a
28 common evidentiary record, because of the

1 large number of issues that the proceedings
2 do share in common.

3 ALJ LAU: Do parties want to have any
4 other thoughts on this issue?

5 (No response.)

6 ALJ LAU: All right.

7 Hearing none, then we will move on.
8 Thank you, parties, for your comments. The
9 Commissioner and I will consider your
10 comments. But the determination will be made
11 later, possibly in the scoping memo.

12 So we turn to our last item in the
13 agenda, which is Alternative Dispute
14 Resolution, ADR. The Commission has an
15 alternative dispute resolution program that
16 offers mediation, early neutral evaluation,
17 and facilitation services using trained
18 Administrative Law Judges who have -- who are
19 serving as neutrals. We encourage ADR
20 Resolution or other settlements on some or
21 all issues in this proceeding. Parties may
22 request ADR facilitation by contacting me,
23 the assigned ALJ or the ADR coordinator, ALJ
24 Charles Ferguson.

25 In addition to ADR, parties are
26 welcomed and encouraged to pursue outside
27 settlement talks, using whatever methods you
28 wish. We remind parties to consult with

1 Rule 12 in considering settlement options.
2 We will consider any motions for settlement
3 at any time, but remind that settlements
4 before evidentiary hearings are most helpful.

5 Are there any other matters that
6 parties want to address before we conclude
7 this prehearing conference?

8 (No response.)

9 ALJ LAU: All right. Hearing none,
10 then this prehearing conference is concluded.
11 Thank you for your participation.

12 We are adjourned. Off the record.

13 (Whereupon, at the hour of 3:37
14 p.m., this matter having been
15 concluded, the Commission then
16 adjourned.)

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, KARLY POWERS, CERTIFIED SHORTHAND REPORTER
NO. 13991, 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 MAY 2, 2022.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS MAY 10, 2022.



KARLY POWERS
CSR NO. #13991

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