

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



FILED
01/31/23
04:59 PM
A2202016

ADMINISTRATIVE LAW JUDGE ELAINE LAU, presiding

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

REPORTERS' TRANSCRIPT
Virtual Proceeding
January 24, 2023
Pages 47 - 222
Volume 2
PUBLIC

Reported by: Doris Huaman, CSR No. 10538
Karly Powers, CSR No. 13991
Tamara Dawson, CSR No. 11497

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

WITNESSES	PAGE
DOUGLAS BAUDER	
Direct Examination By Mr. Jerman	88
Cross-Examination By Mr. Parker	89
Cross-Examination By Mr. Freedman	136
Cross-Examination By Ms. Babiarz	168
Cross-Examination By Mr. Langley	177
Cross-Examination By Mr. Geesman	179
Cross-Examination By Mr. Geesman	215

EXHIBITS	MARKED	RECEIVED
A4NR-1	59	
CA-1	59	
PW-01	59	
PW-02	59	
PW-03	59	
SCE/SDGE-01	60	
SCE-01	60	
SCE-01 E	60	
SCE-02	60	
SCE-03	60	
SCE-03 E	61	
SCE-03 E2	61	
SCE-03C	61	
SCE-03C E	61	
SCE-03C E2	61	
SCE-04	62	
SCE-04 E	62	
SCE-04C	62	
SCE-04C E	62	
SCE-05	62	
SCE-06	63	
SCE-06 A	63	
SCE-06 AE	63	
SCE-06 E	63	
SCE-07	64	
SCE-08	64	
SCE-09	64	
SCE-09 Appendix G	64	
SCE-09 E	64	
SCE-09C	65	
SCE-09C E	65	
SCE-10	65	
SDGE-01	65	
SDGE-02	65	
SDGE-02-C	66	
SDGE-03	66	

1	SDGE-03-C	66
	SDGE-04	66
2	SDGE-04-A	66
	SDGE-05	67
3	TURN-1	67
	TURN-1C	67
4	TURN-2	67
	TURN-3C	67
5	TURN-4	68
	TURN-5C	68
6	TURN-6C	68
	TURN-7C	68
7	TURN-8	68
	TURN-9	69
8	TURN-10C	69
	TURN-11	69
9	TURN-12C	69
	TURN-13	70
10	TURN-14	70
	TURN-15C	70
11	TURN-16	70
	TURN-17	70
12	SCE-11	71
	A4NR-X-1	71
13		71
	A4NR-X-3	71
14	A4NR-X-4	72
	A4NR-X-5	72
15	A4NR-X-6	72
	A4NR-X-7	72
16	A4NR-X-8	72
	A4NR-X-9	73
17	A4NR-X-10	73
	A4NR-X-11	73
18	A4NR-X-12	73
	A4NR-X-13	74
19	A4NR-X-14	74
	A4NR-X-15	74
20	A4NR-X-16	74
	A4NR-X-17	75
21	A4NR-X-18	75
	A4NR-X-19C	75
22	A4NR-X-20	76
	A4NR-X-21	76
23	A4NR-X-22C	76
	A4NR-X-23	76
24	A4NR-X-24	77
	A4NR-X-25	77
25	A4NR-X-26	77
	A4NR-X-27	78

1	A4NR-X-28	78
	A4NR-X-29	78
2	A4NR-X-30	78
	A4NR-X-31	78
3	A4NR-X-32	79
	A4NR-X-33	79
4	A4NR-X-34	79
	A4NR-X-35	79
5	A4NR-X-36	79
	A4NR-X-37	80
6	A4NR-X-38	80
	A4NR-X-39	80
7	A4NR-X-40	80
	A4NR-X-41	81
8	A4NR-X-42-C	81
	A4NR-X-43-C	81
9	A4NR-X-44-C	81
	A4NR-X-45-C	82
10	TURN-5	145
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

VIRTUAL PROCEEDING

JANUARY 24, 2023 - 10:06 A.M.

* * * * *

ADMINISTRATIVE LAW JUDGE LAU: Let's go on the record. The Commission will come to order. This is the time and place for evidentiary hearing in Application 22-02-016, which is the Joint Application of Southern California Edison, or Edison, and San Diego Gas & Electric Company, or SDG&E, for the 2021 Nuclear Decommissioning Cost Triennial Proceeding.

Good morning. I am Administrative Law Judge Elaine Lau and the proceeding officer of this proceeding. The assigned Commissioner is Commissioner Darcie Houck. She is not in attendance today, but her advisor, Bridget Horan, is in attendance.

Before we begin, I'd like to go over a few housekeeping matters. First, is the schedule. We will begin each day at 10:00 a.m. with about a one-hour lunch break at around 12:30. There will be a 15-minute break in the morning, another 15-minute break in the afternoon. Today we may end as late as 5:00 p.m.

Yesterday we circulated a list, a schedule, the cross-examination schedule, and we will try to follow and adhere to it as much as possible.

In a moment, I will have the attorneys from

1 each party state their appearance for the record. At
2 that moment, attorneys will attest to the statements I
3 circulated yesterday, which will also appear on the
4 screen. And also, when a witness first appears on the
5 witness stand, I'd also like the witness to make their
6 attestations, as well.

7 The next item is exhibits. So before we begin
8 our cross-examination time, I will mark and identify all
9 the exhibits that were on the draft exhibit list that
10 Edison circulated and also the cross-examination
11 exhibits that were served by parties yesterday. At the
12 end of hearings on Thursday, I will then take motions
13 for entering the exhibits into evidence. At that time,
14 I will also take motions for confidential treatment of
15 those exhibits. So that's for Mr. Jerman and Mr. Trial.

16 During the next few days, I would like to ask
17 Edison to meet and confer with parties to put together a
18 list of exhibits that parties stipulate to enter into
19 evidence. So a list of stipulated exhibits. If
20 possible, I would like Edison to provide a list of the
21 stipulated exhibits on Thursday, by Thursday morning or
22 just by Thursday, before I take motions for entering
23 exhibits into evidence. Also, I would also like Edison
24 to maintain an ongoing list of exhibits identified and
25 entered into evidence. Our proceeding analyst, Julie

1 Lane, will also be keeping the list, and so you two can
2 kind of work together to make sure that we have a good
3 copy.

4 Finally, for all the parties, I would like all
5 of the parties to mail me two hard copies of all
6 exhibits. I've received hard copies of all the direct
7 testimony, but I don't have any hard copies of the
8 cross-examination exhibits that were served yesterday.
9 So if there were any cross-examination exhibits that
10 were served these few days, particularly from A4NR and
11 from TURN, I'd like two hard copies of these exhibits
12 mailed to me. And if there were any corrections made on
13 the stand, also I will need a hard copy of the revised
14 version. And send me two hard copies of the revised
15 versions.

16 The last item is the common briefing outline.
17 So Mr. Jerman, also in the next two days I would like
18 parties to meet and confer to agree on a common briefing
19 outline. I would like Edison to kind of put together,
20 you know, an agreed upon common briefing outline. And,
21 you know, if we can, the goal is Thursday we can talk
22 about it, you know, at the end of hearings. That's -- I
23 know that's a goal, and that may be a lofty goal, but if
24 we can kind of try to, you know, get the parties' heads
25 together, if you guys have a, you know, an idea of how,

1 you know, a briefing -- a common briefing outline would
2 look like. But if not, I would like Edison to kind of
3 work with parties, and once you get a common briefing
4 outline to serve it to the service list.

5 That is all the housekeeping items I have so
6 far. Do parties have any questions before we move on?

7 MR. GEESMAN: Your Honor, when would you like
8 those hard copies of cross-examination exhibits?

9 ALJ LAU: I think in the next week or two. Ms.
10 Lane is helping me to put hard copies into our central
11 files, so it's -- I want to make her job easy, so maybe
12 in the next two weeks.

13 MR. GEESMAN: Certainly.

14 ALJ LAU: Any other questions?

15 (No response.)

16 ALJ LAU: Before we went on record we discussed
17 the cross-examination of confidential data and if A4NR
18 will need time for cross-examination of confidential
19 data. So during the lunch hour today our IT -- our IT
20 staff will discuss how we can do a closed session for
21 confidential data.

22 So if there are no questions, I'd like to begin
23 our first order of business, which is to take attendance
24 and to have attorneys make attestations. So once I call
25 on your party, I want the counsel representing the party

1 to introduce themselves. When you introduce yourself,
2 it is an opportunity to specify your preferred pronoun.
3 This is not a requirement, but just an opportunity to
4 make our preferences known. Then please wait for me,
5 and I will ask the attorney to make the attestations
6 that I discussed earlier.

7 Okay, can we have the attestations shown on the
8 screen. Robert or Jacob, can you put the attorney
9 attestations on the screen. Thank you.

10 So let us start with Edison.

11 MR. JERMAN: Good morning, your Honor. This is
12 Ryan Jerman appearing on behalf of Southern California
13 Edison. My preferred pronouns are he and him. And let
14 me also note that attorney Anne Mitchell will also be
15 appearing for Edison in this proceeding.

16 ALJ LAU: Okay.

17 MR. JERMAN: And as to the attestation, would
18 you like me to read each line or I can --

19 ALJ LAU: I want to ask, did you have an
20 opportunity to review the attestations on the screen?

21 MR. JERMAN: I have.

22 ALJ LAU: Thank you.

23 Do you agree to the set of attestations set
24 forth on the screen?

25 MR. JERMAN: I do agree.

1 ALJ LAU: Thank you.

2 So next we have SDG&E.

3 MR. TRIAL: Good morning, your Honor. This is
4 Allen Trial for SDG&E. I attest to the attorney
5 attestation, and I go by him.

6 ALJ LAU: And you had the opportunity to read
7 the attestation on the screen; correct?

8 MR. TRIAL: Yes, I have a copy with me.

9 ALJ LAU: Okay, thank you.

10 A4NR.

11 MR. GEESMAN: Thank you, your Honor. John
12 Geesman representing the Alliance for Nuclear
13 Responsibility, also known as the acronym A4NR. I go by
14 he and him. I have read the attorney attestation and
15 agree to it.

16 ALJ LAU: Thank you.

17 Cal Advocates.

18 MR. PARKER: Good morning, your Honor. My name
19 is Wayne Parker. I am the attorney for the Public
20 Advocates Office of the California Public Utilities
21 Commission, better known as Cal Advocates.

22 ALJ LAU: Did you have an opportunity to review
23 the attestations on the screen?

24 MR. PARKER: Yes, your Honor. I looked at a
25 PDF copy that was attached to the e-mail that I received

1 from you earlier.

2 ALJ LAU: And do you agree to the set of
3 attestations?

4 MR. PARKER: Yes, ma'am.

5 ALJ LAU: Okay, thank you.

6 What about TURN?

7 MR. FREEDMAN: Good morning, your Honor.
8 Matthew Freedman, attorney representing The Utility
9 Reform Network. I have reviewed the attorney
10 attestations and agree to them in full, and my pronouns
11 are he, him.

12 ALJ LAU: Okay, thank you.

13 And Public Watchdogs.

14 MR. LANGLEY: Good morning, your Honor. My
15 name is Charles Langley. I am representing Public
16 Watchdogs. My preferred pronouns are he and him, and I
17 have read the attestation.

18 ALJ LAU: And do you agree to the attestations,
19 Mr. Langley?

20 MR. LANGLEY: Yeah.

21 ALJ LAU: Thank you.

22 MR. LANGLEY: And we also have Nina Babiarz.

23 MS. BABIARZ: Good morning, Judge Lau.

24 ALJ LAU: Can you please introduce yourself.

25 MS. BABIARZ: My name is Nina Babiarz. I'm

1 Director of Development for Public Watchdogs. And I too
2 have read through the attorney attestations and agree
3 with the content.

4 ALJ LAU: Okay, thank you.

5 Mr. Jerman, is your partner on screen or is she
6 going to appear tomorrow?

7 MR. JERMAN: She's not on screen, your Honor,
8 and she will appear tomorrow.

9 ALJ LAU: Okay. So we will have her make those
10 attestations tomorrow morning.

11 Did I miss anyone?

12 (No response.)

13 ALJ LAU: Okay, thank you. Thank you all.

14 So the next order of business is to mark and
15 identify the exhibits. We will first mark and identify
16 the exhibits that were on the draft exhibit list and
17 then tackle the cross-examination exhibits. Let's go
18 off record.

19 (Off the record.)

20 ALJ LAU: Back on the record.

21 I am going to now mark and identify a list of
22 exhibits. The first exhibit that I will mark and
23 identify is exhibit A4NR-1, which is titled "Prepared
24 Testimony of John Geesman with Attachments A-E."

25 ///

1 (Exhibit A4NR-1 was marked for
2 identification.)

3 ALJ LAU: The next exhibit I will mark and
4 identify is CA-1, which is the "Direct Testimony of
5 Monica Weaver."

6 (Exhibit CA-1 was marked for identification.)

7 ALJ LAU: The next exhibit is PW-1, which is
8 titled "Public Watchdogs Direct Testimony Charles
9 Langley and Nina Babiarz."

10 (Exhibit PW-01 was marked for
11 identification.)

12 ALJ LAU: PW-2, which is titled "Public
13 Watchdogs Amended Direct Testimony Langley, Babiarz."

14 (Exhibit PW-02 was marked for
15 identification.)]

16 ALJ LAU: Next Exhibit I will mark and identify
17 is PW-03, which is titled Public Watchdogs Exhibits 1
18 through 5 of Direct Testimony, September 23rd, 2022.

19 (Exhibit PW-03 was marked for
20 identification.)

21 ALJ LAU: The next exhibit is SCE/SDGE-01 --
22 excuse me. Let me repeat that for the record again --
23 SCE/SDGE-01, which is titled SCE/SDGE Direct Testimony
24 2021 NDCTP Reasonableness Framework.

25 ///

1 (Exhibit No. SCE/SDGE-01 was marked for
2 identification.)

3 ALJ LAU: The next exhibit is SCE-01, which is
4 titled SCE Direct Testimony 2021 NDCTP Policy.

5 (Exhibit No. SCE-01 was marked for
6 identification.)

7 ALJ LAU: The next exhibit is SCE-01 E, which
8 is titled SCE Various 2021 NDCTP Errata to Policy.

9 (Exhibit No. SCE-01 E was marked for
10 identification.)

11 ALJ LAU: The next exhibit is SCE-02, which is
12 titled SCE Direct Testimony 2021 NDCTP SONGS 1, 2018 to
13 2020 Recorded Costs. Let me repeat the title. It is
14 SCE Direct Testimony 2021 NDCTP SONGS 1, 2018 to 2020
15 Recorded Costs.

16 (Exhibit No. SCE-02 was marked for
17 identification.)

18 ALJ LAU: Next exhibit is SCE-03 titled SCE
19 Direct Testimony 2021 NDCTP SONGS 2-3, 2018 to 2020
20 Recorded Costs.

21 (Exhibit No. SCE-03 was marked for
22 identification.)

23 ALJ LAU: Next exhibit, SCE-03 -- excuse me.
24 Let me repeat that.

25 Next exhibit is SCE-03 E, SCE Various Errata

1 2021 NDCTP SONGS 2, 3, 2018 to 2020 Record Costs.

2 (Exhibit No. SCE-03 E was marked for
3 identification.)

4 ALJ LAU: Next exhibit is SCE-03 E2 titled SCE
5 Various 2021 NDCTP 2nd Errata to SONGS 2, 3, 2018 to
6 2020 Recorded Costs.

7 (Exhibit No. SCE-03 E2 was marked for
8 identification.)

9 ALJ LAU: Next exhibit is SCE-03C titled
10 Confidential Version: SCE-03C Testimony on the
11 Reasonableness of SONGS 2 & 3 Nuclear Decommissioning
12 Expenses Incurred During 2018 through 2020.

13 (Exhibit No. SCE-03C was marked for
14 identification.)

15 ALJ LAU: Next exhibit is SCE-03C E, which is
16 titled SCE Various Errata SONGS 2 & 3, 2018 to 2020
17 Record Costs.

18 (Exhibit No. SCE-03C E was marked for
19 identification.)

20 ALJ LAU: Next exhibit is SCE-03C E2 titled SCE
21 Various 2021 NDCTP Second Errata to SONGS 2 & 3, 2018 to
22 2020 Recorded Costs CONFIDENTIAL.

23 (Exhibit No. SCE-03C E2 was marked for
24 identification.)

25 ALJ LAU: Next exhibit is SCE-04 titled SCE

1 Direct Testimony 2021 NDCTP SONGS 1 and SONGS 2 & 3 DCE
2 PUBLIC VERSION.

3 (Exhibit No. SCE-04 was marked for
4 identification.)

5 ALJ LAU: Next exhibit is SCE-04 E titled SCE
6 Various Errata 2021 NDCTP SONGS 1 and SONGS 2 & 3 DCE
7 PUBLIC.

8 (Exhibit No. SCE-04 E was marked for
9 identification.)

10 ALJ LAU: Next exhibit is SCE-04C titled
11 Confidential Version: SCE-04C Testimony on the SCE 2020
12 SONGS 1 and 2020 SONGS 2 & 3 Decommissioning Cost
13 Estimates.

14 (Exhibit No. SCE-04C was marked for
15 identification.)

16 ALJ LAU: Next exhibit is SCE-04C E titled A --
17 titled -- sorry -- SCE Various Errata 2021 NDCTP SONGS 1
18 and SONGS 2 & 3, DCE CONFIDENTIAL.

19 (Exhibit No. SCE-04C E was marked for
20 identification.)

21 ALJ LAU: Next exhibit is SCE-05 titled SCE
22 Direct Testimony 2021 NDCTP Palo Verde DCE.

23 (Exhibit No. SCE-05 was marked for
24 identification.)

25 ALJ LAU: Next exhibit is SCE-06 titled SCE

1 Direct Testimony 2021 NDCTP Trust Fund Contributions and
2 Financial Assumptions 2021.

3 (Exhibit No. SCE-06 was marked for
4 identification.)

5 ALJ LAU: Next exhibit is SCE-06 A -- sorry.
6 Let me repeat that. Let me correct that.

7 Next exhibit will be marked as and identified
8 as SCE-06 A, which is titled SCE Various Amended Trust
9 Fund Contributions and Financial Assumptions 2021.

10 (Exhibit No. SCE-06 A was marked for
11 identification.)

12 ALJ LAU: Next exhibit is SCE-06 AE, which is
13 titled Errata to Amended Testimony on 2021 SCE Trust
14 Fund Contributions and Financial Assumptions.

15 (Exhibit No. SCE-06 AE was marked for
16 identification.)

17 ALJ LAU: Next exhibit is SCE-06 E, which is
18 the Errata to Testimony on 2021 SCE Trust Fund
19 Contributions and Financial Assumptions.

20 (Exhibit No. SCE-06 E was marked for
21 identification.)

22 ALJ LAU: Next exhibit is SCE-07, which is
23 titled SCE Direct Testimony 2021 NDCTP DOE Litigation
24 Proceeds.

25 ///

1 (Exhibit No. SCE-07 was marked for
2 identification.)

3 ALJ LAU: Next exhibit is SCE-08, which is
4 titled SCE Direct Testimony 2021 NDCTP Compliance with
5 Prior Commission Decisions.

6 (Exhibit No. SCE-08 was marked for
7 identification.)

8 ALJ LAU: Next exhibit, SCE-09, which is titled
9 Rebuttal Testimony Public Version.

10 (Exhibit No. SCE-09 was marked for
11 identification.)

12 ALJ LAU: Next exhibit is SCE-09, Appendix --
13 sorry. Excuse me. Let me say that again.

14 Next exhibit will be identified as SCE-09,
15 which is titled 2021 NDCTP Rebuttal Testimony Appendix
16 G.

17 (Exhibit No. SCE-09 Appendix G was marked for
18 identification.)

19 ALJ LAU: Next exhibit is SCE-09 E, which is
20 titled SCE Various 2021 NDCTP Errata to Rebuttal
21 Testimony PUBLIC.

22 (Exhibit No. SCE-09 E was marked for
23 identification.)

24 ALJ LAU: Next exhibit is SCE-09C, which is
25 titled Rebuttal Testimony Confidential Version. Excuse

1 me.

2 (Exhibit No. SCE-09C was marked for
3 identification.)

4 ALJ LAU: Next exhibit is SCE-09C E, which is
5 titled SCE Various 2021 NDCTP Errata to Rebuttal
6 Testimony CONFIDENTIAL.

7 (Exhibit No. SCE-09C E was marked for
8 identification.)

9 ALJ LAU: Next exhibit is SCE-10, which is
10 titled Acronym List.

11 (Exhibit No. SCE-10 was marked for
12 identification.)

13 ALJ LAU: Next exhibit, SDGE-01, which is
14 titled SDG&E's Oversight and Fiscal Management Role at
15 SONGS, DOE Litigation Proceeds, and Compliance with
16 Prior Commission Decisions.

17 (Exhibit No. SDGE-01 was marked for
18 identification.)

19 ALJ LAU: Next exhibit is SDGE-02, which is
20 titled Reasonableness of SONGS 1, 2 & 3 Decommissioning
21 Activities and Costs Incurred by SDG&E in 2018 through
22 2020.

23 (Exhibit No. SDGE-02 was marked for
24 identification.)

25 ALJ LAU: Next exhibit is SDGE-02-C, which is

1 titled Reasonableness of SONGS 1, 2 & 3 Decommissioning
2 Activities and Costs Incurred by SDG&E in 2018 through
3 2020 CONFIDENTIAL.

4 (Exhibit No. SDGE-02-C was marked for
5 identification.)

6 ALJ LAU: Next exhibit is SDGE-03, which is
7 titled 2020 SONGS 1 and SONGS 2 & 3 DCE.

8 (Exhibit No. SDGE-03 was marked for
9 identification.)

10 ALJ LAU: Next exhibit is SDGE-03-C, which is
11 titled 2020 SONGS 1 and SONGS 2 & 3 DCE CONFIDENTIAL.

12 (Exhibit No. SDGE-03-C was marked for
13 identification.)

14 ALJ LAU: Next exhibit is SDGE-04, which is
15 titled Financial Modeling, Trust Fund Contributions, Tax
16 Issues and Regulatory Accounting.

17 (Exhibit No. SDGE-04 was marked for
18 identification.)

19 ALJ LAU: Next exhibit is SDGE-04-A, which is
20 titled Amended - Financial Modeling, Trust Fund
21 Contributions, Tax Issues and Regulatory Accounting.

22 (Exhibit No. SDGE-04-A was marked for
23 identification.)

24 ALJ LAU: Next exhibit is SDGE-05, which is
25 titled Rebuttal Testimony - DOE Litigation Proceeds,

1 Reasonableness of SONGS Unit 1, Units 2 & 3 Nuclear
2 Decommissioning Activities and Costs Incurred During
3 2018 through 2020, and Reasonableness of 2020 SONGS Unit
4 1 and SONGS Units 2 & 3 Decommissioning Cost Estimates.

5 (Exhibit No. SDGE-05 was marked for
6 identification.)

7 ALJ LAU: Next exhibit is TURN-1, which is
8 titled Direct Testimony of Robert Kinosian.

9 (Exhibit No. TURN-1 was marked for
10 identification.)

11 ALJ LAU: Next exhibit is TURN-1C, which is
12 titled Direct Testimony of Robert Kinosian,
13 Confidential.

14 (Exhibit No. TURN-1C was marked for
15 identification.)

16 ALJ LAU: Next exhibit is TURN-2, which is
17 titled Attachments to Direct Testimony of Robert
18 Kinosian, Public.

19 (Exhibit No. TURN-2 was marked for
20 identification.)

21 ALJ LAU: Next exhibit is TURN-3C, which is
22 Attachments to Direct Testimony of Robert Kinosian,
23 Confidential.

24 (Exhibit No. TURN-3C was marked for
25 identification.)

1 ALJ LAU: Next I will identify -- mark and
2 identify Exhibit TURN-4, which is titled SCE Responses
3 to TURN Data Request 2, Questions 5, 9, 18.

4 (Exhibit No. TURN-4 was marked for
5 identification.)

6 ALJ LAU: Next exhibit is TURN-5C, which is
7 titled SCE Response to TURN Data Request 2, Question 6.

8 (Exhibit No. TURN-5C was marked for
9 identification.)

10 ALJ LAU: Next exhibit is TURN-6C, which is SCE
11 Response to TURN Data Request 2, Question 7.

12 (Exhibit No. TURN-6C was marked for
13 identification.)

14 ALJ LAU: Next exhibit is TURN-7C, which is
15 titled SCE Response to TURN Data Request 2, Question 13.

16 (Exhibit No. TURN-7C was marked for
17 identification.)

18 ALJ LAU: Next exhibit is TURN-8, which is SCE
19 Response -- SCE Responses to TURN Data Request 1,
20 Question 25 with Attachments.

21 (Exhibit No. TURN-8 was marked for
22 identification.)

23 ALJ LAU: Next exhibit, TURN-9, which is titled
24 SCE Response to TURN Data Request 17, Question 20 in
25 A.18-03-009. SCE responses to TURN Data Request 2,

1 Question 10 in A.22-02-016.

2 (Exhibit No. TURN-9 was marked for
3 identification.)]

4 ALJ LAU: Next exhibit, TURN-10C titled: SCE
5 Response to TURN Data Request 1, Question 23, SCE
6 Responses to TURN Data Request 2, Questions 2, 11, 12,
7 14, with Attachments, and SCE Response to TURN Data
8 Request 11, Question 5 in A.18-03-009.

9 (Exhibit TURN-10C was marked for
10 identification.)

11 ALJ LAU: Next exhibit is TURN-11, which is
12 Excerpts from SCE Advice Letters 3285-E, 3535-E, Excerpt
13 from SONGS 2 and 3 2017 Decommissioning Costs Estimate.

14 (Exhibit TURN-11 was marked for
15 identification.)

16 ALJ LAU: Next exhibit is TURN-12C, which is
17 titled: SCE Response to TURN Data Request 2, Questions
18 3 -- Question 3, with Attachments.

19 (Exhibit TURN-12C was marked for
20 identification.)

21 ALJ LAU: Next exhibit is TURN-13, which is
22 titled: Excerpts from SONGS Units 2 and 3
23 Decommissioning Revised Project Description,
24 December 2017.

25 ///

1 (Exhibit TURN-13 was marked for
2 identification.)

3 ALJ LAU: Next exhibit is TURN-14, which is
4 SCE's Responses to TURN Data Request 2, Questions 19 and
5 20.

6 (Exhibit TURN-14 was marked for
7 identification.)

8 ALJ LAU: Next exhibit is TURN-15C, which is
9 SCE Response to TURN Data Request 2, Question 4.

10 (Exhibit TURN-15C was marked for
11 identification.)

12 ALJ LAU: Next exhibit is TURN-16, which is
13 titled: SCE responses to TURN Data Request 2, Questions
14 8, 15, 16, 17, 23, 27, 31, and 33.

15 (Exhibit TURN-16 was marked for
16 identification.)

17 ALJ LAU: Next exhibit is Exhibit TURN-17,
18 which is the Joint Motion for Adoption of Settlement
19 Agreement in A.21-12-007.

20 (Exhibit TURN-17 was marked for
21 identification.)

22 ALJ LAU: At this time, I actually would like
23 to go off the record and get the list of exhibits all,
24 kind of, queued up for the next set of exhibits for
25 A4NR.

1 Before we go off record -- actually, Karly,
2 let's go off the record right now.

3 (Off the record.)

4 ALJ LAU: Back on the record.

5 We mark and identify Exhibit SCE-11, which is
6 titled: SCE-A4NR-001 Data Request Response.

7 (Exhibit SCE-11 was marked for
8 identification.)

9 ALJ LAU: Next exhibit is A4NR-X-1, which is
10 titled: Transcript of January 24, 2019 Pre-Decisional
11 Enforcement Conference Between SCE and the NRC.

12 (Exhibit A4NR-X-1 was marked for
13 identification.)

14 ALJ LAU: Next exhibit is A4NR-X-2, which is
15 the -- which is the Transcript of March 25, 2019 NRC
16 Public Webinar to Discuss Enforcement Decisions.

17 (Exhibit A4NR-X-2 was marked for
18 identification.)

19 ALJ LAU: Next exhibit is A4NR-X-3, which is
20 titled: Pages 1, 3, and 45 to 47, from Transcript of
21 March 28th, 2019 CEP Meeting.

22 (Exhibit A4NR-X-3 was marked for
23 identification.)

24 ALJ LAU: Next exhibit is A4NR-X-4, which is
25 titled: Pages 1 and 85 from Transcript of March 28th,

1 2019, CEP Meeting.

2 (Exhibit A4NR-X-4 was marked for
3 identification.)

4 ALJ LAU: Next exhibit is A4NR-X-5, which is
5 titled: Pages 1 and pages 152 to 153 from Transcript of
6 March 28th, 2019 CEP Meeting.

7 (Exhibit A4NR-X-5 was marked for
8 identification.)

9 ALJ LAU: Next exhibit is A4NR-X-6, which is
10 titled: Pages 1 and Pages 164 to 165 from Transcript of
11 March 28th, 2019 CEP Meeting.

12 (Exhibit A4NR-X-6 was marked for
13 identification.)

14 ALJ LAU: Next exhibit is A4NR-X-7, which is
15 titled: Pages 1 and Pages 41 to 43 from Transcript of
16 March 28th, 2019 CEP Meeting.

17 (Exhibit A4NR-X-7 was marked for
18 identification.)

19 ALJ LAU: Next exhibit is A4NR-X-8, which is
20 titled: Pages 1, and Pages 71 to 73, from Transcript of
21 March 28th, 2019 CEP Meeting.

22 (Exhibit A4NR-X-8 was marked for
23 identification.)

24 ALJ LAU: Next exhibit is A4NR-X-9, which are
25 Pages 1, 82 to 83, from Transcript of March 28th, 2019

1 CEP Meeting.

2 (Exhibit A4NR-X-9 was marked for
3 identification.)

4 ALJ LAU: Next exhibit is A4NR-X-10- which are
5 Pages 1, 157 to 158, from Transcript of March 28th, 2019
6 CEP Meeting.

7 (Exhibit A4NR-X-10 was marked for
8 identification.)

9 ALJ LAU: Let's go off the record while I load
10 the next set of ten.

11 (Off the record.)

12 ALJ LAU: Okay. Let's go back on the record
13 again.

14 We now mark and identify Exhibit A4NR-X-11,
15 which is titled: Pages 1, 162 to 163, from Transcript
16 of March 28th, 2019 CEP Meeting.

17 (Exhibit A4NR-X-11 was marked for
18 identification.)

19 ALJ LAU: Next exhibit is A4NR-X-12, which is
20 titled: Pages 1, 10, from Transcript of June 3rd, 2019,
21 NRC Public Webinar.

22 (Exhibit A4NR-X-12 was marked for
23 identification.)

24 ALJ LAU: Next exhibit is A4NR-X-13, which is
25 titled: Pages 1, 23 to 24, from Transcript of June 3rd,

1 2019 NRC Public Webinar.

2 (Exhibit A4NR-X-13 was marked for
3 identification.)

4 ALJ LAU: Next exhibit is A4NR-X-14, which are
5 pages -- which are titled -- which is titled: Pages 1,
6 57 to 58, from Transcript of June 5th, 2019 CEP meeting.

7 (Exhibit A4NR-X-14 was marked for
8 identification.)

9 ALJ LAU: Next exhibit is A4NR-X-15, titled:
10 Pages 1 and 75 from Transcript of June 5th, 2019 CEP
11 meeting.

12 (Exhibit A4NR-X-15 was marked for
13 identification.)

14 ALJ LAU: Let's go off the record.

15 (Off the record.)

16 ALJ LAU: Let's go back on record.

17 The next exhibit we will mark and identify is
18 A4NR-X-16, which is titled: Page 2 from Minutes of
19 December 6, 2018 EC Meeting.

20 (Exhibit A4NR-X-16 was marked for
21 identification.)

22 ALJ LAU: The next exhibit is A4NR-X-17, which
23 is titled: Kerry Rod Presentation to December 6 --

24 (Reporter clarification.)

25 ALJ LAU: Yes.

1 So, the exhibit we mark and identify as
2 A4NR-X-17 is titled: Kerry Rod presentation to
3 December 6, 2018 EC Meeting.

4 (Exhibit A4NR-X-17 was marked for
5 identification.)

6 ALJ LAU: The next exhibit is A4NR-X-18 which
7 is titled: Second Kerry Rod Presentation to December 6,
8 2018 EC Meeting.

9 (Exhibit A4NR-X-18 was marked for
10 identification.)

11 ALJ LAU: Next exhibit is A4NR-X-19, which is
12 titled --

13 MR. GEESMAN: Your Honor, excuse me.

14 ALJ LAU: Go ahead.

15 MR. GEESMAN: I believe the exhibit you're
16 about to announce should now be marked confidential.

17 ALJ LAU: Yes. Let me correct myself.

18 So, the exhibit should be marked and identified
19 as A4NR-X-19C, which is titled: Pages 2 to 3 from
20 Minutes of January 10, 2019 EC Meeting, Confidential.

21 (Exhibit A4NR-X-19C was marked for
22 identification.)

23 ALJ LAU: Next exhibit is A4NR-X-20, which is
24 titled: Jim Peattie -- sorry. Excuse me. Let me
25 repeat that. Jim Peattie Presentation to January 10th,

1 2019 EC Meeting.

2 Again, it's Jim Peattie Presentation to January
3 10th, 2019 EC Meeting.

4 (Exhibit A4NR-X-20 was marked for
5 identification.)

6 ALJ LAU: Let go off the record while I load
7 the next set of exhibits.

8 (Off the record.)

9 ALJ LAU: Let's go on record.

10 The next exhibit is A4NR-X-21, which is titled:
11 Jim Peattie Presentation to February 7th, 2019 EC
12 Meeting.

13 (Exhibit A4NR-X-21 was marked for
14 identification.)

15 ALJ LAU: The next exhibit is A4NR-X-22C, which
16 is titled: Bruce Ellis Presentation to February 7th,
17 2019 EC Meeting, confidential.

18 (Exhibit A4NR-X-22C was marked for
19 identification.)

20 ALJ LAU: Next exhibit is A4NR-X-23, which is
21 titled: Pages 3 to 4 from Minutes of March 7th, 2019 EC
22 Meeting.

23 (Exhibit A4NR-X-23 was marked for
24 identification.)

25 ALJ LAU: Next exhibit is A4NR-X-24, which is

1 titled: Vince Bilovsky Presentation to March 7th, 2019
2 EC Meeting.

3 (Exhibit A4NR-X-24 was marked for
4 identification.)]

5 ALJ LAU: Next exhibit is A4NR-X-25, which is
6 titled "Pages 2 and 4 from Minutes of April 4th, 2019 EC
7 Meeting."

8 (Exhibit A4NR-X-25 was marked for
9 identification.)

10 ALJ LAU: Next exhibit -- actually, let me go
11 off record.

12 (Off the record.)

13 ALJ LAU: Let's go back on record.

14 The next exhibit we marked and identified is
15 Exhibit A4NR-X-25, which is titled "Pages 2 and 4 from
16 Minutes of April 4th, 2019 EC Meeting."

17 Next exhibit is A4NR-X-26, which is titled
18 "Vince Bilovsky Presentation to April 4th, 2019 EC
19 Meeting."

20 (Exhibit A4NR-X-26 was marked for
21 identification.)

22 ALJ LAU: Next exhibit is A4NR-X-27, which is
23 titled "Pages 2 to 3 from Minutes of May 2nd, 2019 EC
24 Meeting."

25 ///

1 (Exhibit A4NR-X-27 was marked for
2 identification.)

3 ALJ LAU: Next exhibit is A4NR-X-28, which is
4 titled "Vince Bilovsky Presentation to May 2nd, 2019 EC
5 Meeting."

6 (Exhibit A4NR-X-28 was marked for
7 identification.)

8 ALJ LAU: Next exhibit is A4NR-X-29, which is
9 titled "Vince Bilovsky Presentation to June 6th, 2019 EC
10 Meeting."

11 (Exhibit A4NR-X-29 was marked for
12 identification.)

13 ALJ LAU: Next exhibit is A4NR-X-30, which is
14 titled "Page 2 from Minutes of July 11th, 2019 EC
15 Meeting."

16 (Exhibit A4NR-X-30 was marked for
17 identification.)

18 ALJ LAU: Let's go off the record.

19 (Off the record.)

20 ALJ LAU: Back on record.

21 The next exhibit is A4NR-X-31, which is titled
22 "Vince Bilovsky Presentation to July 1, 2019 EC
23 Meeting."

24 (Exhibit A4NR-X-31 was marked for
25 identification.)

1 ALJ LAU: Next exhibit is A4NR-X-32, which is
2 titled "Pages 3 to 4 from Minutes of August 8th, 2019 EC
3 Meeting."

4 (Exhibit A4NR-X-32 was marked for
5 identification.)

6 ALJ LAU: Next exhibit is A4NR-X-33, which is
7 titled "November 22nd, 2019 Letter from NRC Concerning
8 Instructions."

9 (Exhibit A4NR-X-33 was marked for
10 identification.)

11 ALJ LAU: Next exhibit is A4NR-X-34, which is
12 titled "Page 2 from Minutes of September 5th, 2019 EC
13 Meeting."

14 (Exhibit A4NR-X-34 was marked for
15 identification.)

16 ALJ LAU: Next exhibit is A4NR-X-35, which is
17 titled "Vince Bilovsky Presentation to September 5th,
18 2019 EC Meeting."

19 (Exhibit A4NR-X-35 was marked for
20 identification.)

21 ALJ LAU: Next exhibit is A4NR-X-36, which is
22 titled "Page 3 from Minutes of October 3rd, 2019 EC
23 Meeting."

24 (Exhibit A4NR-X-36 was marked for
25 identification.)

1 ALJ LAU: Next exhibit is A4NR-X-37, which is
2 titled "Randy Besich Presentation to February 18, 2021
3 EC Meeting."

4 (Exhibit A4NR-X-37 was marked for
5 identification.)

6 ALJ LAU: Next exhibit is A4NR-X-38, which is
7 titled "SCE Response to Data Request A4NR-SCE-04
8 Q.04.a-c."

9 (Exhibit A4NR-X-38 was marked for
10 identification.)

11 ALJ LAU: Next exhibit is A4NR-X-39, which is
12 titled "Vince Bilovsky Presentation to April 9th, 2020,
13 EC Meeting."

14 (Exhibit A4NR-X-39 was marked for
15 identification.)

16 ALJ LAU: Can we go off the record.

17 (Off the record.)

18 ALJ LAU: Back on the record.

19 The next exhibit I will mark and identify is
20 A4NR-X-40, which is titled "Wayne Norton Presentation to
21 May 27, 2021 EC Meeting."

22 (Exhibit A4NR-X-40 was marked for
23 identification.)

24 ALJ LAU: Next exhibit is A4NR-X-41, which is
25 titled "SCE Response to Data Request A4NR-SCE-04 Q.05."

1 (Exhibit A4NR-X-41 was marked for
2 identification.)

3 MR. GEESMAN: Your Honor.

4 ALJ LAU: Yes, Mr. Geesman.

5 MR. GEESMAN: Excuse me. The next four
6 exhibits that you are about to identify, 42, 43, 44, and
7 45, should all be marked as confidential.

8 ALJ LAU: Okay. Thank you, Mr. Geesman.

9 The next exhibit we will mark and identify is
10 A4NR-X-42-C, which is titled "Page 8 from Minutes of
11 August 19, 2021 EC Meeting."

12 (Exhibit A4NR-X-42-C was marked for
13 identification.)

14 ALJ LAU: Next exhibit is A4NR-X-43-C, which is
15 titled "SCE August 25, 2021 Letter to DGC on End State
16 Definition."

17 (Exhibit A4NR-X-43-C was marked for
18 identification.)

19 ALJ LAU: Next exhibit is A4NR-X-44-C, which is
20 titled "SCE February 28, 2022 Notice to DGC of Proposed
21 Change" confidential.

22 (Exhibit A4NR-X-44-C was marked for
23 identification.)

24 ALJ LAU: Next exhibit is A4NR-X-45-C, which is
25 titled "April 6th, 2022 DGC Request for Change Order"

1 confidential.

2 (Exhibit A4NR-X-45-C was marked for
3 identification.)

4 ALJ LAU: Those are the exhibits I have
5 received so far.

6 Mr. Geesman, Mr. Freedman and Mr. Jerman, Mr.
7 Allen, Mr. Langley, parties, can you confirm that I have
8 identified and marked all the exhibits that will be in
9 discussion during these next three days of evidentiary
10 hearing. Please let me know if I've missed anything.

11 MR. FREEDMAN: Your Honor, this is Matt
12 Freedman with TURN.

13 We do have, I believe, two additional exhibits
14 that will be served tonight for Ms. Dalu, from SDG&E,
15 that are not on the list that you have just read.

16 ALJ LAU: That is fine, thank you.

17 MR. GEESMAN: Your Honor, John Geesman from
18 A4NR, confirming that you have identified all of the
19 exhibits that we plan to introduce. And based on your
20 direction earlier this morning, I will serve exhibits
21 19-C, 22-C, 42-C, 43-C, 44-C, and 45-C on that portion
22 of the service list that has been designated as eligible
23 to receive confidential exhibits.

24 ALJ LAU: Thank you, Mr. Geesman. And I think
25 it would help Mr. Jerman and his peers if you would

1 prepare a list of -- maybe according to the format of
2 the exhibit list. And you too, Mr. Freedman, if you can
3 send Mr. Jerman that list and he can just compile it.
4 Also, please cc our proceeding analyst, Julie Lane, when
5 you send those lists to Mr. Jerman. Thank you.

6 MR. GEESMAN: Yes, your Honor.

7 MR. FREEDMAN: Your Honor, just for
8 clarification, the e-mail that I had sent to you earlier
9 with the list of our exhibits was sent to the entire
10 service list. Are you suggesting we should send a
11 different type of e-mail?

12 ALJ LAU: Did you cc Ms. Lane on the e-mail?
13 If you can forward it to her just in case.

14 MR. FREEDMAN: Okay, I will ensure that -- I
15 believe she was on the service list distribution, but I
16 will ensure that she is and re-forward it if she did not
17 receive it originally. Is there a separate list that
18 you're looking for us to create?

19 ALJ LAU: I would just think that it may help
20 Mr. Jerman if you put it in the exhibit list format, but
21 it's up to Mr. Jerman how he wants to do it.

22 MR. FREEDMAN: We can add it to the template
23 document he provided for parties. No problem.

24 ALJ LAU: Thank you.

25 And Mr. Jerman, make sure you serve that

1 cross-examination exhibit or exhibit in lieu of cross to
2 Ms. Lane, as well.

3 MR. JERMAN: We will, we will. And we'll work
4 with Mr. Geesman and Mr. Freedman in compiling the list
5 in the Excel spreadsheet.

6 And Judge Lau, let me confirm too that the
7 exhibits you just marked are the only hearing exhibits
8 that SCE is aware of.

9 ALJ LAU: Okay, thank you.

10 So now, one hour into hearings, we will finally
11 call our first witness. We are prepared to get our
12 first witness.

13 Are there any other matters that parties want
14 to address before we proceed?

15 MR. PARKER: One, your Honor. Wayne Parker for
16 Cal Advocates.

17 ALJ LAU: Go ahead.

18 MR. PARKER: Yes, your Honor.

19 With regard to the confidential exhibits, there
20 was a discussion earlier this morning about signed NDAs
21 and who would receive the confidential exhibits. I
22 would like to note that Cal Advocates' attorneys, as a
23 rule, do not sign NDAs, nor does Cal Advocates, because
24 under Public Utilities Code Section 583 we are
25 statutorily mandated to keep confidential all

1 information that we receive from parties; specifically,
2 the regulated entities in any public utilities
3 proceeding. And therefore, we would ask that we receive
4 all these copies even though there is no NDA that has
5 been executed by Cal Advocates.

6 ALJ LAU: Yeah. Thank you, Mr. Parker, for the
7 clarification. I believe you have been, and your -- it
8 seems, from what I see, that you and all the other Cal
9 Advocates' staff on the service list have been receiving
10 confidential exhibits; is that correct?

11 MR. PARKER: That is correct, your Honor.

12 ALJ LAU: And they are eligible to be
13 participating in the confidential session when we have
14 the closed session.

15 MR. PARKER: That is correct, your Honor.

16 ALJ LAU: Are there any other matters we need
17 to address before we call our first witness?

18 MR. JERMAN: I have one brief matter, your
19 Honor. Ryan Jerman for SCE.

20 We had reserved time, cross-time, for Mr.
21 Kinosian, the TURN witness; and Mr. Geesman, A4NR
22 witness, and we are going to waive our cross of both of
23 those witnesses. Mr. Geesman, from A4NR, has agreed to
24 stipulate to admission of SCE-11, which is certain A4NR
25 responses to SCE data requests, in lieu of the

1 cross-examination of Mr. Geesman.

2 ALJ LAU: Okay. So then on the schedule can I
3 confirm that it would only be Ms. Dalu? I don't know if
4 I pronounced your name right, Ms. Dalu, Tracy Dalu, on
5 the third day; is that correct?

6 MR. JERMAN: That's correct.

7 ALJ LAU: Okay. Well, actually now it is, you
8 know, an hour into hearings. And I apologize, but I
9 actually do think that we need to take a 15-minute
10 break. You know, it's one 15-minute break for two
11 hours, that's my goal. So let us take a 15-minute
12 break. We will be back -- it is now 11:10. We will be
13 back at 11:25. Let's go off the record.

14 (Recess taken.)

15 ALJ LAU: Let's go on record.

16 Now we will call -- we will have our first
17 witness on the stand.

18 Jacob, can you project the witness
19 attestations.

20 So I will have Mr. Jerman call his first
21 witness, and then I will ask that the witness identify
22 themselves. At that moment the witness can also specify
23 their preferred pronoun, if they so choose, but that is
24 not a requirement. And after they identify themselves,
25 then I will ask that the witness attest to agreeing to

1 the set of attestations set forth on the screen, but I
2 will cue the witness after they identify themselves.

3 So Mr. Jerman, you may call your first witness.

4 MR. JERMAN: Southern California Edison calls
5 Doug Bauder.

6 ALJ LAU: Mr. Bauder, can you identify
7 yourself, and you may specify your preferred pronoun if
8 you so choose.

9 THE WITNESS: Yes, your Honor. My name's
10 Douglas Bauder. He, him --

11 UNKNOWN SPEAKER: Excuse me, Mr. Bauder, if you
12 could just speak up a little bit into your microphone
13 for the court reporters. Thank you.

14 THE WITNESS: I'm sorry, I'm having a struggle
15 with the mute.

16 Yes, your Honor. My name's Doug Bauder, and I
17 would mention that my preferred pronouns are he and him.

18 ALJ LAU: Okay, thank you.

19 Mr. Bauder, did you have an opportunity to
20 review the attestations that are set forth on the
21 screen?

22 THE WITNESS: Yes, your Honor.

23 ALJ LAU: Do you agree to the set of
24 attestations?

25 THE WITNESS: Yes, I do.

1 ALJ LAU: Thank you.

2 Mr. Jerman, you may proceed to sponsoring the
3 witness.

4 MR. JERMAN: Thank you, your Honor.

5 DOUGLAS BAUDER,
6 called as a witness by Southern California
7 Edison, having been sworn and attested,
8 testified as follows:

9 DIRECT EXAMINATION

10 BY MR. JERMAN:

11 Q Mr. Bauder, is the purpose of your testimony
12 here today specific to portions of SCE-1, 3, 7 and 9, as
13 identified in the tables of contents for those exhibits
14 and as modified by errata submitted to those exhibits?

15 A Yes, it is.

16 Q Was the material that you are sponsoring
17 prepared by you or under your supervision?

18 A Yes.

19 Q And where the material that you are sponsoring
20 is factual in nature, do you believe it to be accurate?

21 A Yes, I do.

22 Q And where the material you are sponsoring is
23 opinion or judgments, does it represent your best
24 judgment?

25 A Yes.

1 Q And do you adopt those portions of SCE exhibits
2 1, 3, 7 and 9, identified in the tables of contents for
3 those exhibits, to be your sworn testimony in this
4 proceeding?

5 A Yes, I do.

6 MR. JERMAN: And your Honor, Mr. Bauder is
7 available for cross-examination.

8 ALJ LAU: Thank you.

9 We will have Mr. Parker, from Cal Advocates,
10 begin first.

11 MR. PARKER: Thank you, your Honor. Wayne
12 Parker, attorney representing the Public Advocates
13 Office of the California Public Utilities Commission,
14 better known as Cal Advocates.

15 CROSS-EXAMINATION

16 BY MR. PARKER:

17 Q Good morning, Mr. Bauder. How are you doing
18 today?

19 A Good morning. I'm fine, thank you.

20 Q Sir, just a few preliminary questions based on
21 your background that you provided as an appendix to
22 exhibit SCE-07. It's Appendix A, for the record.

23 Could you just give us a bit of a summary of
24 your educational background and experience?

25 A Yes, I'm a college graduate. I graduated from

1 LeTourneau University. As far as work experience, I've
2 worked in the United States Navy, I've worked in several
3 power plants; Calvert Cliffs Nuclear Power Plant, Nine
4 Mile Point working for Constellation Energy Company.
5 I've worked for Southern California Edison for
6 approximately -- well, since February of 2009, so
7 approximately 14 years in various positions with Edison.

8 Q Thank you, sir.

9 What is your current job title and role?

10 A Vice President of Decommissioning and Chief
11 Nuclear Officer.

12 Q All right. If you would also for the record,
13 could you describe your prior positions and titles that
14 you've held since joining SCE in 2009?

15 A Yes, I initially joined SCE in February of 2009
16 as the Plant Manager for SONGS Units 2 and 3, and then
17 later was promoted in 2010 to Site Vice President of San
18 Onofre. In approximately November of 2013, I changed
19 positions and moved to Vice President of Operational
20 Services at Edison, which included the chief procurement
21 officer function. And then in November of 2018, late
22 November of 2018, I was reassigned back to San Onofre.

23 Q Thank you, sir.

24 Do you have before you a copy of the document
25 entitled, quote, 2021 NDCTP Rebuttal Testimony, and

1 marked as exhibit SCE-09?

2 A Yes, I do.

3 Q And just to confirm, did you draft or aid in
4 drafting any part of the exhibit now shown to you and
5 marked as exhibit SCE-09?

6 A I assisted in reviews of SCE-09, and ultimately
7 was part of the approval process for the document
8 itself.

9 Q Okay then, sir.

10 If you would please turn to page 4 of SCE-09
11 and let me know once you have gotten there.

12 A Okay, I'm here.

13 Q All right, sir. I'm joining you here. One
14 moment.

15 ALJ LAU: Sorry, is it SCE-09?

16 MR. PARKER: Yes, your Honor.

17 ALJ LAU: Okay, thank you.

18 MR. PARKER: And it's page 4 that I'm starting
19 the first line of questioning on.

20 Q Just to confirm, Mr. Bauder, you drafted, or at
21 least approved what information is contained on page 4
22 of exhibit SCE-09?

23 A That's right.

24 Q Mr. Bauder, would you read aloud the testimony
25 on lines 14 to 19 of page 4 of exhibit SCE-09 for the

1 record.

2 A Okay, under the title "Please describe the
3 Canister Misalignment Event," is that what you're
4 referring to?

5 Q Yes.

6 A All right, thank you. I haven't read aloud for
7 a while, so here we go:

8 On August 3rd, 2018, while the 29th of (73)
9 spent fuel canister was being lowered into
10 the cavity enclosure container at the
11 ISFSI, which means Independent Spent Fuel
12 Storage Installation, the canister became
13 misaligned with the cavity enclosure
14 container and, as a result, became wedged
15 on the shield ring. During the period the
16 canister was wedged on the shield ring, the
17 canister was not supported by rigging.
18 That's footnoted with Footnote 3 on this
19 page. (the weight of the canister was
20 supported by the shield ring and the side
21 of the cavity enclosure container). Once
22 the situation was understood, the
23 downloading crew re-supported the canister
24 with the rigging and safely lowered the
25 canister into the cavity enclosure

1 container.]

2 Did that do it?

3 Q Yes, sir. Thank you. Now, let me ask --

4 before I ask you any details about what happened at the

5 ISFSI that day, were you at the ISFSI at any point on

6 August 3rd, 2018?

7 A No, I was not.

8 Q Did you personally witness the container

9 misalignment incident referenced in this testimony on

10 page 4, lines 14 to 19?

11 A Do you mean -- are you asking me again,

12 Mr. Parker, was I at the ISFSI storage location when

13 this canister was being lowered? No, I was not there.

14 Q Yes, sir. That was my question, and thank you.

15 Given that you were not personally at the ISFSI

16 site when the container misalignment incident occurred,

17 how is it that you know what happened during the

18 incident that day?

19 A I've reviewed a lot of information about the

20 incident that day including our follow-up fact-finding

21 of the incident, a root cause evaluation and apparent

22 cause evaluation, NRC inspection report, information

23 from my team directly when I did report back to San

24 Onofre on -- at the end of November 2018 and just a

25 whole lot of other information about the event. So I

1 have a pretty good picture of what happened to cause
2 this event and what corrective actions were implemented
3 to prevent future recurrence.

4 Q And just to confirm, your knowledge of the
5 event is based on your review of reports by eye
6 witnesses and others who were there that day?

7 A That's right.

8 Q All right, sir. Now, looking again at page 4
9 of the rebuttal testimony marked as Exhibit SCE-09, the
10 text that you read off, you stated in that text --
11 quoted the text to read that the container became wedged
12 on the shield ring; is that correct?

13 A That's right.

14 Q And according to the testimony, how did the
15 rigging crew deal with the container after it became
16 wedged on the shield ring?

17 A The rigging crew understood that it was wedged.
18 The rigging crew notified what we call the cask loading
19 supervisor. They followed the procedure to regain
20 the -- to re-rig the canister and support its weight and
21 then safely lowered the canister into the cavity
22 enclosure. I believe that whole process took about 45
23 to 55 minutes.

24 Q Thank you, sir. You anticipated my next
25 question. All right.

1 And another question then. Was there any
2 damage of any kind to the canister or to the fuel
3 assemblies or fuel pellets?

4 A No.

5 Q And if I understand correctly from the
6 testimony that is marked in Exhibit SCE-09 -- pardon
7 me -- the shield ring is not designed to support the
8 weight of the canister; is that correct?

9 A I believe that's correct. If I could direct
10 you to page 8 of the same testimony, SCE-09, there's a
11 diagram in figure -- labeled 2-4 that shows the shield
12 ring. In this particular case, the canister was resting
13 on that ring. And you can see that the ring is
14 supported by gussets, which are very strong. So
15 although there are no calculations that were performed
16 to say this -- you know, is the shield ring designed to
17 support the weight of the canister? In my estimation,
18 it definitely can, and it did.

19 Q All right then. Now, if the canister had
20 become unwedged from the shield ring and then dropped
21 approximately what looks like 18 feet to the bottom of
22 the canister, what would or could have happened to the
23 canister and its contents?

24 A So first, if the canister had become unwedged,
25 it likely would have dropped, and you're right. I think

1 as to the amount of fall, which would have been roughly
2 18 feet, the canister would not have been damaged to the
3 extent that it would still be able to perform its
4 designed function. There's a potential that the fuel
5 stored inside the canister could have become deformed in
6 such an event.

7 Q All right, sir. Now, you referenced the
8 photograph on page 8. It's a photograph of the shield
9 ring in the CEC. Is that the shield ring of the
10 particular -- is that the particular one that was
11 involved in the incident with this container?

12 A I don't know. I will tell you that this shield
13 ring represents the 73 storage locations that we have on
14 the -- what I'll call the ISFSI, the Independent Spent
15 Fuel Storage Installation. So it matches what
16 else is -- the other shield rings.

17 And I would also point out there was no damage
18 done to the shield ring during this incident.

19 Q Okay then. And referring back to page 8 of the
20 Exhibit SCE-09, what did you mean -- or what did the
21 writers mean, because it's SCE's work product here, when
22 they wrote that the canister was downloaded safely on
23 the same day the downloading began? This is a little
24 unclear to me.

25 A I believe I mentioned earlier that the crew

1 on -- at the ISFSI pad in working to download Canister
2 No. 29 here followed their procedure. So when they
3 identified that the canister was not downloaded, they
4 contacted the cask loading supervisor who then notified
5 operations at Edison, and the cask loading supervisor
6 directed the crew to regain the weight of the canister
7 and safely download it, which the crew did.

8 Q Okay, sir. And it's SCE's testimony that its
9 contractor, Holtec, suspended fuel transfer operations
10 that day and did not resume fuel transfer operations
11 until July 15th, 2019?

12 A Just with one minor adjustment to what you
13 said. The Holtec crew suspended operations on that
14 evening of August the 3rd, 2018, and as soon as SCE
15 management became aware of the event, SCE management
16 suspended all fuel transfer operations until July 15th
17 of 2019. That was an appropriate suspension to
18 investigate all aspects of this incident and prevent
19 recurrence.

20 And when I say "all aspects of fuel transfer,"
21 that includes transfer operations that were ongoing in
22 the Unit 3 spent fuel pool. A canister there was safely
23 stored until everything was ready to restart fuel
24 transfer operations, as we've already mentioned, in July
25 of 2019.

1 Q So if I understand correctly, there's an
2 11-month hiatus in fuel transfer operations at SONGS 2
3 and 3?

4 A That's right. And that was appropriate because
5 this involved an incident that had to do more with a
6 latent design condition where a canister could become
7 hung up like this than anything else. And so once that
8 condition was identified, it was appropriate for Edison
9 to make changes to procedures, to training to implement
10 design changes to the machinery to prevent a recurrence.

11 And I'll also mention -- I think you already
12 know this -- that we hold nuclear safety and personal
13 safety in the highest regard. So we took a very careful
14 approach to restarting fuel transfer.

15 Q Understood. Now, with regard to this incident
16 and your concerns for safety, do you recall or know the
17 date on which SCE notified the Nuclear Regulatory
18 Commission, or NRC, of this incident?

19 A Yes. SCE placed an informational call on
20 Monday, I believe, August the 6th, to the NRC, Region 4
21 describing the incident and describing that fuel
22 transfer operations had been faulted ending
23 investigations.

24 Q Okay. And do you recall or know on what date
25 an event report was filed by SCE with the NRC?

1 A Subject to looking it up, I believe that date
2 was on or about September 14th of the month following
3 the incident, and that was through discussions with the
4 NRC. The actual regulations with this being a
5 first-of-a-kind event and being an -- what we call an
6 unanalyzed condition were difficult to interpret for the
7 crew here -- the management here. And so after working
8 through that with the NRC, the formal report was filed
9 with the NRC operation center, I believe, on September
10 14th, but I would need to look that up.

11 Q And just so you know, Mr. Bauder, that -- is
12 that my notes actually do show that it was -- an event
13 report was filed on September 14th, 2018. So your
14 recollection is correct.

15 Did you have any role in preparing that
16 incident report submitted to the NRC?

17 A No, I did not. In fact, that incident report
18 follows the standard format and the operating protocol
19 for the NRC. So I would -- I know that the management
20 staff here followed the standard format for the report.

21 Q Did you have any knowledge as to why the SCE
22 submitted the incident report to the NRC on September
23 the 14th, which is about a month after the container
24 handling incident occurred?

25 A So I mentioned previously that the staff here

1 was put in a situation where they had to interpret the
2 regulations in what we call Part 72, which is the
3 portion of the regulations that governs ISFSI storage
4 operations of fuel transfers and the like. And so
5 that -- review of the regulations was not easy, this
6 being a first-of-a-kind event, not for us but for the
7 industry. And so it took some time to review all of
8 that, and the condition was identified ultimately
9 through discussions with the NRC and reported.

10 There seems to be quite a bit of focus on the
11 timing here, and I fully appreciate that. But I will
12 tell you that the NRC operation center doesn't get what
13 we would call an incident report. They simply get a
14 report that says, "This condition of Part 72 is being
15 reported because this canister was left unsupported by
16 rigging and didn't have redundant load drop protection,"
17 or words like that.

18 The timing of the report to the operation
19 center is very important for operational issues, such as
20 security and other matters. In this case, there were no
21 other licensees handling fuel using the Holtec system
22 anyway in the U.S. And so the report, although it's a
23 requirement -- and it's a firm requirement -- in this
24 case, is somewhat administrative in nature.

25 Q Okay then. After the report was filed, do you

1 know if the NRC investigated and issued a special report
2 on the container handling incident that occurred in
3 August 2018?

4 A So after the discussion that Edison had with
5 the NRC on, I believe, Monday, August the 6th, the NRC
6 decided to perform a special inspection at San Onofre.
7 That inspection occurred over a time interval preceding
8 November, and my recollection is that the NRC issued a
9 special inspection report on or about November 18th of
10 2018 following the incident. Their investigation and
11 their special inspection had little to do with the
12 off-center report. It had more to do with the
13 functional issue that occurred from a design standpoint
14 with the canister.

15 Q Would -- did they make any mention -- they
16 being the NRC -- excuse me -- about this design flaw
17 that you referred to earlier with regard to the storage
18 container?

19 A You're asking did they make a mention of the
20 design flaw? They inspected the system, the equipment.
21 They interviewed the personnel that were involved in the
22 loading of the canister, and they came up with findings
23 in they're inspection report. So yes.

24 Q Did you read that -- the NRC special report on
25 the container handling incident?

1 A Yes.

2 Q And did the NRC issue a Notice of Violation and
3 Proposed Imposition of Civil Penalty?

4 A The NRC did issue a notice of violation and
5 gave us, the licensee, the chance to do a -- what we
6 call a pre-enforcement conference at NRC Region 4, which
7 we did.

8 Q Do you recall the amount of the proposed civil
9 penalty for the container handling incident?

10 A My recollection -- I believe that the proposed
11 civil penalty for the handling incident itself was
12 \$116,000.

13 Q Okay, sir. Now a question I have is the NRC
14 did make mention of the design flaw to the storage
15 container. My question is, was SCE aware of this design
16 flaw before this incident?

17 A Before this incident, neither SCE nor the NRC
18 was aware that such an incident like this could occur,
19 and I would point out the importance of that statement
20 because had SCE, us -- had we become aware that
21 something like this could occur, we would have stopped
22 fuel transfer operations, just like we did on August
23 3rd, and fully investigated it to put the corrective
24 actions in place to prevent recurrence. Because simply
25 having this potential for the canister rigging to become

1 unsupported is not acceptable to Edison and -- nor would
2 it ever be for a licensee. It must be prevented even
3 though -- even though there was no canister drop.

4 Q Okay. Understood. Thank you, sir. Let me
5 ask. The canister design, was it an SCE design,
6 proprietary design, or was it a design by an outside
7 company and something that SCE then bought as an end
8 product?

9 A So the canister design was -- is a Holtec
10 product. Holtec is the original equipment manufacturer
11 and holds that design. I hope that answers the
12 question. The NRC approves that design through a
13 certificate of compliance that allows licensees to use
14 that design at their nuclear stations.

15 Q So if I understand you correctly, Holtec
16 designed the container. Most likely, they obtained the
17 patent on the design, and then the NRC examines the
18 design and issues an approval of the design on which SCE
19 then relied when it decided to use Holtec's container;
20 is that correct?

21 A Correct. I'm just not sure of what patents
22 Holtec may or may not have around the container. Just
23 to point out, Holtec's design was used not just for the
24 canister but for the storage system, what we call the
25 cavity enclosure container, the CEC. So if you look at

1 any number of figures, figure 2, figure 3 on page 7 of
2 SCE-09, it shows sort of a cutaway of a cavity enclosure
3 container where the canisters are stored.

4 Q Yes, sir. Okay. If you would, please, sir,
5 could you turn to page 9 of SCE-09.

6 A Okay.

7 Q Would you look at lines -- well, I see here --
8 I'm just making sure I'm finding the right spot here.
9 The first five lines of page 9, do you see that?

10 A Yes.

11 Q The testimony states here that the Commission
12 applies a certain standard to determine whether actions
13 taken and costs incurred by the utilities to perform
14 decommissioning work were reasonable.

15 So you see where that's stated here, correct,
16 sir?

17 A I do.

18 Q And they use the phrase "reasonable manager
19 standard"; is that what you see as well, sir?

20 A Right.

21 Q The testimony also cites to a Commission
22 decision in line 2. Do you see that citation?

23 A Are you referring to Decision point 16-12-063.

24 Q Yes, sir. That is the decision number,
25 Decision No. 16-12-063.

1 A Right.

2 Q All right. Pardon me. On the same page, SCE's
3 testimony is that -- and I'm trying to find here --
4 okay. Starting on line 15, if you would read that
5 sentence, just that one full sentence that starts on
6 line 15 and ends on line 17 for the record.

7 A Sure. It starts with:

8 Thus reasonableness of a particular
9 management action depends on what the
10 utility knew or should have known at the
11 time that the managerial decision was made,
12 not how the decision holds up in light of
13 future developments or events.

14 ALJ LAU: I'm sorry. I'm going to interject.
15 When we read, I think we -- let's try to, you know, slow
16 it down so the court reporter can transcribe it, because
17 when we read, we actually read faster than we normally
18 talk. Thank you.

19 THE WITNESS: Okay. I'll do that. Would you
20 like me to read it again, your Honor?

21 ALJ LAU: No, I think it's fine.

22 THE WITNESS: Okay.

23 BY MR. PARKER:

24 Q Thank you, Mr. Bauder. Let me go back here to
25 that same page and what you just read. Do you know if

1 that language that you just read is the direct quote
2 from Commission Decision 16-12-063?

3 A I haven't personally looked at that decision
4 D.16-12-063, so I don't know if it's a direct quote from
5 the decision. I believe it likely is.

6 Q All right then. I see that the -- that the
7 language you just read also has a footnote, footnote 8,
8 at the bottom of page 9.

9 Do you see that?

10 A Yes, I do.

11 Q And it cites to another Commission decision,
12 Decision 02-08-064.

13 Do you see that?

14 A I do. I'm looking at the footnote.

15 Q Let me ask you, sir, have you ever read that
16 decision, Decision 02-08-064?

17 A I may have. I just don't have my decision
18 numbers matched up with the context of the decisions. I
19 think there's quite a few there, but I may have read it.
20 I may have not.

21 Q Okay. Let me ask you. With regard to Decision
22 02-08-064, do you recall the subject matter of the
23 application for which that decision was issued?

24 A No, I do not.

25 Q Okay. Do you recall the date on which that

1 Decision 02-08-064 was issued?

2 A No, I do not. I mean, it's -- just -- I'm just
3 looking at them now. It would seem to me that the
4 decision numbers might match up with the years. So D.02
5 might be 2002.

6 Q You are correct, sir. It was August 22nd,
7 2002. Rather than discuss the decision, let me just
8 move on. The following sentence, which is -- starts on
9 line 18 of page 9, it starts, "The reasonable manager
10 standard."

11 Do you see that, sir?

12 A I do.

13 Q Would you read that sentence for the record.

14 A My line 18 starts with the phrase "Optimal
15 act."

16 Q That's the partial sentence. I'm sorry. I
17 meant the full sentence that starts towards the end of
18 the line.

19 A Oh. Okay. I will. Yes. "The reasonable
20 manager standard is the standard of care that
21 demonstrates all actions were well-planned, properly
22 supervised and all necessary records are retained." And
23 I would point out that we're discussing here about
24 prudence, and it's my firm position that the crew
25 involved in the incident -- canister hang-up event on

1 August 3rd, 2018 acted prudently through the campaign to
2 the point of this event. They acted prudently in trying
3 to understand the condition and restore the canister to
4 a safe position following what we call the hang-up
5 event. And the actions taken subsequent to the event
6 were prudent as well and thorough, keeping in mind the
7 highest levels of nuclear and personal safety.

8 ALJ LAU: Thank you, Mr. Bauder, for
9 intentionally reading more slowly for the court
10 reporter. Thank you.

11 THE WITNESS: Oh. Thank you.

12 BY MR. PARKER:

13 Q Mr. Bauder, do you regularly and as part of
14 your duties with regard to, say, this incident or other
15 incidents interpret Commission decisions on what is the
16 reasonable manager standard?

17 A I don't regularly do that, no. I'm -- I think
18 I'm reasonably versed in the standard, but I don't have
19 a normal practice of sort of reading portions of the
20 standard out loud or -- I'm not sure if I'm answering
21 your question correctly, Mr. Parker.

22 Q Well, let me reframe the question then.

23 You described your educational and professional
24 background. You have never attended law school; am I
25 correct?

1 A That's right.

2 Q And you are not a practicing attorney admitted
3 in any state in the United States?

4 A That's correct.

5 Q Okay, sir. So, essentially, your
6 interpretation of Commission decisions is a layperson's
7 interpretation of what you've read in these decisions?

8 A That's right.

9 Q All right, sir. In this discussion of the
10 reasonable manager -- management standard between lines
11 15 to 20 on page 9 -- you know what? Let's scratch
12 that, sir. Let's go back to page 8.

13 A I'm there. Sorry.

14 Q Okay. Would you read for the record lines 2
15 through 7.

16 A Sure. Starting with line 2 -- do you want me
17 to read the question first or just --

18 Q Yeah. Would you read the question, sir. That
19 will give us context.

20 A Okay. And the question --

21 ALJ LAU: And please remember to read slowly.
22 Thank you.

23 THE WITNESS: Will do. Thank you, your Honor.

24 The question posed in line 1, "Were there any
25 direct costs of the event?"

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Line 2:

No. The canister was downloaded safely on the same day that downloading began, August 3rd, 2018. However, there were indirect costs associated with the event because fuel transfer operations was voluntarily suspended by SCE out of an abundance of caution and pending a review of the event by the Nuclear Regulatory Commission. Work on the 30th canister, which was undergoing final preparations in the spent-fuel pool building at the time of the canister misalignment event, was halted, and the canister was placed in a safe condition in the spent fuel pool building until fuel transfer operations resumed in compliance with license requirements."

Q Thank you, sir. What did SCE mean when this testimony says there were no direct costs from the incident?

A I believe that means direct costs that would have been incurred as the incident -- or from the incident directly. So -- I'm sorry. Because I used the word "direct" in the answer. But maybe the best thing to do there would be to give you an example. Let's say

1 there was an incident at the station that involved
2 equipment damage and let's say, for example, a pump
3 failed and that incident on that pump failure, which
4 would need the pump to be replaced, would be a direct
5 cost. There may be indirect costs due to that pump
6 failure based on effects on other systems, changes in
7 processes, changes in procedures and controls, design,
8 et cetera, but the pump failing itself would be a direct
9 cost because the pump would need to be replaced.

10 So what this was referring to is there was no
11 direct cost because the canister itself was not damaged.
12 The cavity enclosure container was not damaged. The
13 load was never lost. The canister never fell even
14 though we had the potential for that based on the
15 rigging situation. So since those things never
16 happened, there was no direct cost. I hope that helps.]

17 Q No, that -- that is extremely helpful. Thank
18 you, sir.

19 And you also mentioned the idea, and it's in
20 the testimony here, of indirect costs; what kind of
21 indirect costs are we -- or were SCE referring to when
22 they say there were indirect costs associated with the
23 event?

24 A Those costs were ongoing operational costs due
25 to suspension of fuel transfer, costs to improve

1 procedures, improve training, make design changes to the
2 full transfer system specific to the vertical cast
3 transfer machinery, and some other costs just due to the
4 delay itself. I believe we could go to a breakdown of
5 those costs, if I could have a minute to find them.

6 Q That's not necessary, sir. I just wanted to
7 understand conceptually what indirect costs were.

8 A Okay.

9 Q Now, you did mention that among those indirect
10 costs were additional training in light of what happened
11 on August 3rd 2018.

12 Is it possible that the container misalignment
13 event on August 3rd, 2018, and a resulting schedule
14 extension, could have been avoided with additional
15 training and oversight before the container alignment
16 incident?

17 A It's possible, but not likely. If Edison, and
18 I will mention the NRC, had become -- or had known that
19 this sort of a misalignment event could have occurred
20 before the actual start of the campaign in January of
21 2018, the -- the costs to make changes that are
22 mentioned here, including modifications to the
23 equipment, personnel training and procedure changes
24 would have been done before the campaign was ever
25 started.

1 Q Okay. Pardon me. Just looking here.

2 If you would, could you turn to page 12 of
3 SCE-09?

4 A Okay. I'm there. Thank you.

5 Q Let us scroll down to -- or look down to the
6 question on line 17 and the response that follows.

7 Do you see that?

8 A Correct.

9 Q All right then. If you would please, for the
10 record -- I'm sorry to make you read it. I just want to
11 make sure we can all find it in the record -- "we" being
12 the attorneys -- after the hearings are done.

13 Would you read Question 17, and then that
14 response, all the way down to line 25 for the record?

15 A I sure will. Starting with line 17 the
16 question itself?

17 Q Yes, sir.

18 A (Reading from document):

19 Cal Advocates claims that the schedule
20 extension could have been avoided with
21 additional training and oversight, does SCE?

22 In hindsight, it is possible to misalign an
23 event; and subsequent scheduled extension might
24 have been avoided with additional training and
25 oversight. Cal Advocates' hypothetical, which

1 is based solely on findings drawn from SCE's
2 and the NRC's hindsight reviews, is not
3 relevant to the reasonable manager standard,
4 which does not require the optimum act in
5 carrying out decommissioning activities.
6 Indeed, Cal Advocates fails to analyze the
7 quality of the training and oversight provided
8 to decommissioning staff prior to the event and
9 explained why, at the time, it was imprudent
10 and outside the spectrum of reasonable actions.

11 Q So in this testimony here, SCE asserts that Cal
12 Advocates' hypothetical is not relevant to the
13 reasonable manager -- management standard; correct?

14 A Correct.

15 Q And you base -- or SCE bases that statement
16 that you just read, that's on page 12 of the Exhibit
17 SCE-09, that the reasonable manager standard of -- as --
18 well, let me rephrase. I'm sorry.

19 So, SCE is basing that statement on page 12 on
20 its understanding of the reasonable manager standard
21 that's articulated in Decision D.16-12-063; is that
22 correct?

23 A Yes, I believe that's correct.

24 Q But you've previously admitted that it --
25 potentially, the container misalignment event could have

1 been avoided with additional training and oversight.

2 Is that -- are -- do you agree that that's a
3 fair representation of what you stated earlier?

4 A To clarify, I believe what I stated earlier was
5 that -- there is a "might" there, just like described
6 here. In other words, a very low probability it could
7 have been prevented. And, further, I mentioned that if
8 SCE had known of this design condition -- or this
9 canister hang-up that could have occurred, we would have
10 not proceeded with fuel transfer; or we would have
11 stopped at any point during the schedule and performed
12 the actions all outlined in this testimony.

13 Q Is that because of the serious dangers that are
14 posed by nuclear waste?

15 A I don't wanted to generalize the testimony here
16 to nuclear waste. This campaign involved moving nuclear
17 fuel -- spent nuclear fuel -- from the wet storage in
18 the spent fuel pools to the dry storage on the
19 independent storage installation at San Onofre. So, for
20 that type of a process, it is very important for the
21 licensee, me and others at the staff here who were here
22 at the time, to make sure that the highest levels of
23 nuclear safety are carried out.

24 So what might seem like a, you know,
25 why-did-you-do-that type of question to somebody who's

1 not involved in nuclear, for somebody who is, safety is
2 paramount. So you have to understand, in nuclear, every
3 aspect of what you're doing -- if something occurs that
4 is out of normal, you will see that we will stop, we'll
5 reassess, we'll suspend that operation until we have the
6 right barriers and improvements in place to prevent
7 recurrence.

8 Q You testified earlier that you served in the
9 Navy, was that with the Nuclear Power Program in the
10 Navy?

11 A I did serve on U.S. submarines. That's right.

12 Q Okay. So I -- I have some familiarity with
13 that. So I'm going to ask a few confirming questions on
14 your background.

15 You graduated with a degree in engineering and
16 then entered the Navy's Nuclear Power Program?

17 A That's right.

18 Q And how long was the Nuclear Power Program
19 education curriculum?

20 A Two years.

21 Q All right.

22 And then you served onboard a nuclear
23 submarine?

24 A Right.

25 Q And how long did you serve onboard a nuclear

1 submarine?

2 A Two and a half years.

3 Q Okay, sir.

4 So you have a very good formal education, as
5 well as very solid professional experience in the
6 management and the operations of a nuclear fuel plant.

7 Am I correct, sir?

8 A A nuclear power plant. That's right.

9 Q All right, sir.

10 And would it be safe to say that in the course
11 of your education from the Navy and the work you did in
12 the Navy with the nuclear power plant, that you became
13 familiar with the dangers to human health posed by
14 nuclear waste or spent fuel rods or anything having --
15 anything that is generated by the nuclear power process?

16 A I'm well aware of both the potential
17 consequences of mishandling nuclear waste, as I am well
18 aware of the safe protocols for handling, both from
19 working in the Navy and working in civilian nuclear
20 power.

21 Q Okay. Now, you're not a physician, so I'm not
22 going to ask you medical information.

23 What dangers to human health, that you're aware
24 of, are posed by nuclear waste in the container that was
25 involved in that incident on August 3rd, 2018?

1 A Okay. So, there were no dangers to human
2 health regarding the incident itself. The incident
3 involved potential for a canister to fall, as we've
4 previously discussed, due to this hang-up on the shield
5 ring, for which we looked at, and the rigging becoming
6 slack or not in a position to restrain the load. So
7 there's no danger to human health regarding the
8 incident, whatsoever.

9 The canister itself, like all the fuel
10 canisters stored in the ISFSI installation, produces
11 radiation dose. Think of it as an X-ray, so a strong
12 X-ray; and we use shielding to prevent personnel from
13 becoming exposed to that dose.

14 Q Okay. And would the waste that's inside the
15 container have a high enough radiation dose to pose a
16 danger to human health, for the workers or anybody at
17 the plant, if they were exposed to it?

18 A So, if I could understand -- are you
19 postulating a scenario where a worker would just be
20 exposed to -- directly exposed to a nuclear waste
21 storage canister without controls in place; and would
22 that be a danger to the worker?

23 Q Yes, sir. You exactly understood my question.

24 A So, if a worker was exposed to dose from a
25 radiation storage container, or canister in this case,

1 in an uncontrolled way -- in other words, we didn't
2 limit that exposure, that could be a danger to the
3 worker. That's right.

4 Q Okay. And when you say "a danger," we're
5 talking about potential risk of death or serious bodily
6 harm?

7 A I would say that for an extended period of
8 dose, yes. That could happen.

9 Q Okay. So it's -- it's also a question of the
10 duration of the dose, how long the exposure occurs?

11 A Correct. It's also important to understand
12 that the canister is sealed. It's a sealed container.
13 So we're not talking about a dose that would happen to
14 workers, or the public, from radiation -- or radioactive
15 materials leaving the cavity enclosure container that we
16 looked at or the canister itself. We're talking about
17 -- think about it as, like, X-ray, direct radiation from
18 the canister, which is why we use the system that we
19 use. The dose rates are so very low, especially once
20 the canisters are placed -- safely placed in storage.

21 Q Okay. All right, sir. Thank you.

22 I'm going to switch subject matter here. I'm
23 also going to switch exhibits.

24 So if you would, please, could you pull up
25 Exhibit SCE-07?

1 A Sure will.

2 Q This is the -- just for the record, this is
3 marked as "Testimony on Future Disbursements of DOE
4 Litigation Proceeds."

5 A I'm getting there. Just give me a moment,
6 please. Thanks.

7 Q I'm getting there as well, sir.

8 (Crosstalk.)

9 ALJ LAU: Let's go off the record.

10 (Off the record.)

11 ALJ LAU: Let's go back on the record.

12 MR. PARKER: Thank you, your Honor.

13 Thank you, Mr. Bauder.

14 Wayne Parker for Cal Advocates.

15 BY MR. PARKER:

16 Q Mr. Bauder, just to confirm for the record so
17 we have it on the record, you are looking at an ex- --
18 Exhibit SCE-07, which is entitled: Testimony on Future
19 Disbursements of DOE Litigation Proceeds.

20 Is that correct, sir?

21 A That's correct.

22 Q All right, sir.

23 If you would, if you look at the first
24 paragraph on page 1, it -- let me also add for the
25 record: This portion of this exhibit, did you sponsor

1 this testimony or have any role in drafting it?

2 A Yes, I did.

3 Q Okay then.

4 And looking at the first paragraph here, would
5 you read just the first full sentence of the first
6 paragraph, from lines 3 to 5, for the record?

7 A Sure. It's under the subsection, or the
8 initial section, labeled "Introduction."

9 The U.S. Department of Energy (DOE) is
10 contractually obligated to remove spent nuclear
11 fuel from San Onofre Nuclear Generating Station
12 (SONGS), as well as all other commercial
13 nuclear plants across the United States. To
14 date, however, DOE has failed to meet its
15 contractual obligation.

16 Q Thank you, sir.

17 What did you mean when you said that the DOE
18 had failed to meet its contractual obligation?

19 A That's a term that describes the DOE's
20 contractual obligation dating from the Nuclear Waste
21 Policy Act of 1982. And then subsequent to the DOE's
22 failure to, I believe, receive or remove spent nuclear
23 fuel from nuclear stations all around the country --
24 which I believe I'm correct in stating that that removal
25 was scheduled to start happening no later than 1998,

1 subject to looking up the date. This term -- this
2 sentence is used to describe that contractual
3 obligation; because fuel is not being removed by the DOE
4 on the schedule that the Waste Policy Act requires.

5 Q Okay. Just to clarify though, for my
6 understanding and that of the others who will read the
7 record, the Nuclear Waste Storage or Policy Act --
8 excuse me -- Nuclear Waste Policy Act was passed in
9 1982.

10 That is the basis for the DOE obligation to
11 remove the spent fuel; is that correct?

12 A That's right. The act also requires the DOE to
13 develop and license a geologic repository for that fuel,
14 which, as you know, has not happened.

15 Q And, currently, the DOE doesn't have any
16 off-site storage to receive the spent fuel from SONGS;
17 is that correct?

18 A That's right.

19 Q If you would, turn to page 3 in Exhibit SCE-07.

20 A Okay. I'm there.

21 Q Okay then.

22 Would you scroll down to lines 19 to 23, near
23 the bottom of the page?

24 A I'm there. Thank you.

25 Q All right, sir.

1 If you would, would you -- would you read, for
2 the record, lines 19 through 23?

3 A Sure will. Starting with line 19:

4 As a results of DOE's failure to establish
5 a geologic repository to permanently store
6 spent fuel from nuclear power plants, utilities
7 have filed numerous lawsuits against DOE in the
8 U.S. Court of Federal Claims for breach of
9 contract, requesting damages for the costs to
10 install an ISFSI and to store, maintain, and
11 protect spent fuel on ISFSIs at their sites.
12 Utilities, generally, have been successful in
13 recovering spent fuel storage costs in these
14 lawsuits.

15 Q All right, sir --

16 ALJ LAU: Sorry. Can I interject?

17 For the record, Mr. Bauder, can you state what
18 ISFSI means? Like, is it --

19 (Crosstalk.)

20 THE WITNESS: Okay. Sure will, your Honor.
21 "ISFSI," Independent Spent Fuel Storage Installation.
22 It's a mouthful.

23 ALJ LAU: And it's pronounced ISFSI.

24 Thank you.

25 THE WITNESS: You're welcome.

1 MR. PARKER: Okay to go ahead, your Honor, to
2 continue?

3 ALJ LAU: Yes, please.

4 MR. PARKER: Thank you, your Honor.

5 Q Mr. Bauder, if you would, would you scroll down
6 to page 5 of the same document, Exhibit SCE-07?

7 A Okay. I'm there. Thank you.

8 Q Okay. I'm looking at lines 5 and 6.

9 It is your testimony that SCE has engaged
10 DEE -- excuse me -- DOE in four rounds of claims with a
11 fifth round in progress; is that correct?

12 A That is -- that's correct.

13 Q Did SCE establish a memorandum account filed
14 with and approved by the Commission?

15 A Are you referring to a memorandum account to
16 receive proceeds of DOE litigation for spent fuel
17 storage and installation --

18 Q Yes, I'm sorry. Let me -- if you want, I'll
19 reframe the question.

20 Did SCE establish a memorandum account for its
21 share of DOE litigation proceeds that was filed with and
22 then approved by the Commission?

23 A Yes.

24 Q And this is the DOE Litigation Memorandum
25 Account, abbreviated "DOELMA," referred to in your

1 testimony; is that correct?

2 A That's right.

3 Q Does the DOELMA record litigation costs
4 incurred by SCE while pursuing its claims against DOE?

5 A Yes.

6 Q Does the DOELMA record -- I'm sorry. Scratch
7 that.

8 A Excuse me, Mr. Parker. Are you trying to get
9 to litigation expenses versus proceeds? Or do you just
10 mean in total, litigation --

11 Q Litigation proceeds.

12 A Okay.

13 (Crosstalk.)

14 BY MR. WAYNE:

15 Q So the costs and any awards from -- by the U.S.
16 Court of Federal Claims.

17 A Right. So, I just wanted to point out that
18 those proceeds in- -- starting with the amount of claim
19 period covered, proceeds and expenses are covered on
20 page 6, in the same SCE-07, under Table III-1.

21 Q Okay. We were actually going to go there. So,
22 one quick question before we go to that table.

23 If you would look at -- on page 5, your
24 testimony on page 5, lines 18 to 22?

25 A I'm there. Thank you.

1 Q Okay. Would you do -- would you do everybody a
2 favor and read lines 18 to 22 into the record?

3 A I sure will. Starting with line 18:

4 For each round of DOE-claimed proceeds
5 received from the Federal Government, SCE has
6 presented the DOELMA -- which stands for
7 Department of Energy Litigation Memorandum
8 Account -- to the Commission as part of the
9 Energy Resource Recovery Account (ERRA)
10 proceedings for approval. In all previous
11 decisions regarding DOE litigation proceeds,
12 the Commission has approved, as part of ERRA,
13 -- which, once again, is Energy Resource
14 Recovery Account -- the external litigation
15 costs and the net litigation proceeds to be
16 distributed to customers and shareholders when
17 applicable.

18 Q Thank you.

19 Now, if you would, let's go down to page 6 and
20 to the table you referenced earlier. This is table
21 Roman Numeral III-1 entitled: DOE Litigation Proceeds.

22 Have you scrolled down, and do you see the
23 table?

24 A I do see it.

25 Q On the left-hand side of the table, the first

1 column, what is the label for the first column, or
2 column one -- or the left-most column?

3 A Under Table III-1, the left-most column is
4 labeled "DOE Round."

5 Q Thank you, sir.

6 And the first four rows of Table III-1, does --
7 do they detail data with respect to DOE litigation
8 proceeds and how these proceeds were distributed for the
9 period 1998 through 2016?

10 A Yes, they do.

11 Q All right. Sorry. I'm a little confused here
12 with my document. One moment, sir.

13 ALJ LAU: Let's go off the record.

14 (Off the record.)

15 ALJ LAU: Okay. Back on the record.

16 BY MR. WAYNE:

17 Q And according to Table III-1, were SCE customer
18 refunds authorized by Commission for the years 1998 to
19 2016?

20 A Yes, they were.

21 Q And what were the amounts of those refunds for
22 those years?

23 A Would you like me to read those out loud, or --

24 Q Yes, sir. Yeah. Would you read them out loud?

25 A Okay. So under the column labeled "SCE

1 Customer Refund" in Table III-1, starting with DOE Round
2 Number 1: \$92 million;
3 Round 2: \$105 million;
4 Round 3: \$33 million;
5 Round 4: \$34 million;

6 Q Okay. Now, did SCE receive a share of
7 litigation proceeds for the same period 1998 to 2016?

8 A Yes.

9 Q And what were the amounts of SCE's share of the
10 DOE litigation proceeds for those years?

11 A Okay. In the same table, starting with Round
12 1: \$112 million;

13 Round 2: \$124 million;

14 Round 3: \$33 million;

15 And then Round 4: \$34 million.

16 Q And Table III-1 indicates there are pending
17 litigation proceeds for DOE Round Number 5, which covers
18 the period 2017 to mid-2018; is that correct?

19 A That's right.

20 Q And what is the amount of the pending claim in
21 DOE Round Number 5?

22 A The amount of the claim itself is a
23 \$168 million.

24 Q Okay. And, as of yet, there's been no reward
25 or final decision on the amount that has been awarded to

1 SCE or its customers?

2 A That's right.

3 Q Okay, sir.

4 If you would, would you scroll down to page 10?

5 A Okay. I'm at page 10. Thank you.

6 Q Okay. You testified on page 10 that there is
7 uncertainty as to whether or when DOE will construct a
8 permanent spent fuel repository; is that correct?

9 A That's right.

10 Q And based on that uncertainty, your testimony
11 is that SCE proposes that the net DOE litigation be
12 deposited into the appropriate SONGS 1, 2, and 3 NQNDTs;
13 is that correct?

14 A That's right. With NQNDT meaning
15 "Non-Qualified Nuclear Decommissioning Trust."

16 Q Okay. You anticipated my next question.

17 Are net DOE litigation proceeds received from
18 the Federal Government currently being returned to SCE
19 customers?

20 A Net litigation proceeds, SCE's share, are being
21 returned to SCE's customers through the ERRA process --
22 Energy Rate Recovery Account process -- filing, which is
23 covered under a prior CPUC decision and is currently the
24 practice.

25 Q Yes, sir. Thank you.

1 You further assert that if DOE litigation
2 proceeds are deposited into the SONGS 1, 2, and 3,
3 NQNDTs, these funds would be used to store, maintain,
4 and protect the SONGS spent fuel until it is removed by
5 Department of Energy; is that correct?

6 A That's right.

7 Q Will distribution of the net litigation
8 proceeds into the NQNDTs provide additional funds for
9 SCE to store, maintain, and protect the SONGS spent
10 fuel?

11 A We think it will, given the uncertainty as to
12 when the DOE will ultimately meet its obligation. So
13 this puts Southern California Edison in a sustainable
14 environment, where we can continue to use a
15 Non-Qualified Nuclear Decommissioning Trust, after the
16 Qualified Nuclear Decommissioning Trust is exhausted, to
17 continue to fund these activities, which in -- which
18 will provide us enough funding to keep the fuel -- spent
19 nuclear fuel safely stored out beyond the current dates
20 in our decommissioning cost estimate process.

21 So -- and I think you're probably aware that
22 we've done analysis there. And, currently, we only have
23 about \$55 million in contingency beyond 2051, or so.
24 And then the -- after that point, we would run out of
25 funds to safely store the fuel. And we think it's an

1 intergenerational equity issue that would occur by
2 asking future customers to support recovery of customer
3 dollars to safely store the fuel, when it could just be
4 handled differently right now.]

5 Q Okay. Let me ask, were the costs of storing
6 SONGS spent fuel for the period 1998 to 2016 fully met
7 even though DOE litigation proceeds were distributed to
8 SCE customers, as detailed in Table 3-1?

9 A Yes.

10 Q And so what has changed with respect to the
11 cost of storing SONG spent fuel during that period, '98
12 to 2016, and the anticipated costs going forward that
13 might require net litigation proceeds be deposited into
14 the NQNDTs rather than returned to SCE customers?

15 A So, Mr. Parker, if I understand, you said "What
16 has changed?" This isn't so much a what has changed
17 question as to it's a simple mathematical calculation
18 that uses depletion of trust, preceding out and
19 calculating those dollars out through 2051 or
20 thereabouts. So that's really the issue. The issue
21 gets into just that mathematical calculation. Our costs
22 year-to-year in present dollars are about \$22 million to
23 store the fuel, safely store the fuel and meet the
24 obligations of the regulator NRC. And so that's what
25 this is. This is an issue of looking at that process,

1 which is qualified nuclear trust depletion, and doing
2 the calculations out through roughly 2051.

3 Q Okay. And those calculations are based on
4 assumptions on the start date that the DOE would
5 commence taking spent fuel, SONG spent fuel, and placing
6 it in storage; is that correct?

7 A They're really based on assumptions around when
8 the qualified trust would be depleted following final
9 end state activities at the station where the only
10 activities left are to store the fuel pending DOE
11 removal, which is unknown at this time. So this
12 provides a method to keep the trust in a sustainable way
13 to continue to safely store the fuel without going back
14 to the Commission for a request in future years to
15 refund the trust for those activities, if I said that in
16 an understandable way.

17 Q I do think it's understandable.

18 Just to clarify then, you're looking at the
19 duration of the trust based on its current -- it's
20 current funding capacity. There's no new funding coming
21 into it, it's just what the fund contains in it now; is
22 that correct?

23 A Correct. It's what the fund contains plus
24 assumptions around investment value.

25 Q Okay. And the decision -- or let me rephrase

1 that. When the DOE will potentially start to remove
2 nuclear fuel, how does that, if it has any impact at
3 all, affect those calculations?

4 A In the calculations we're assuming that we
5 don't know when the DOE would perform its obligations to
6 collect spent nuclear fuel. Therefore, we're looking to
7 create a situation where we can refund DOE litigation
8 dollars back to the Non-Qualified Nuclear
9 Decommissioning Trust. By the way, I'll mention pending
10 CPUC review, because dollars will still go in the
11 memorandum account anyway before they would then proceed
12 to the Non-Qualified Trust under this proposal. So it's
13 not so much as a calculation as to when the DOE will
14 meet its obligation, we don't know when that is, we're
15 more concerned with an intergenerational equity issue
16 with future customers who never benefited from the power
17 of the nuclear plants.

18 MR. PARKER: Okay then.

19 Your Honor, Cal Advocates has no further
20 questions for this witness at this time.

21 ALJ LAU: All right. It is 12:40, and I
22 apologize, I did not announce how we're going to do
23 this. I will allow one round of redirect and one round
24 of recross. It's 12:40 now. Are we -- I'm hoping that
25 we can kind of finish with Cal Advocates line of

1 questions and redirect and recross by 1:00 o'clock.

2 I don't know, Mr. Parker and Mr. Jerman, do you
3 think -- I don't know how much redirect or recross that
4 there would be.

5 Mr. Jerman, do you have an estimate how many
6 questions of redirect would you have?

7 MR. JERMAN: I would have about, I would
8 estimate, 10 to 20 minutes.

9 Your Honor, would it be possible to save
10 redirect until the end of cross-examination? If it's
11 possible, some of my questions might be answered through
12 further cross-examination. And then if so, then I can
13 omit those and I'll just do redirect based on all the
14 cross at that point.

15 ALJ LAU: Mr. Parker, you're fine with that;
16 right?

17 MR. PARKER: I have no objections, your Honor.

18 ALJ LAU: All right. So you will probably have
19 to stay to the very end.

20 Okay. So let us break for lunch. It is now
21 12:40. I would like for us to return at 1:45. All
22 right. Thank you.

23 (At the hour of 12:42 p.m., a recess was
24 taken until 1:45 p.m.)

25 * * * * *

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

AFTERNOON SESSION - 1:48 P.M.

* * * * *

ALJ LAU: Let's go back on the record. We just came back from a lunch recess, and before recess Mr. Parker, from Cal Advocates, finished his line of cross-examination questions for Mr. Douglas Bauder, and we agreed that we will continue the line of cross-examination questions until the very end. Then, we will allow a round of redirect; and then lastly, a round of recross from all the parties. But actually, I do have a few questions for Mr. Bauder, and I will save it to the very end after A4NR goes. Then, you know, Mr. Jerman can also include those -- my questions in his redirect, as well.

So the next party that will be cross-examining -- that will cross-examine the witness is TURN; right? Correct?

MR. FREEDMAN: Correct, your Honor.

ALJ LAU: Sounds good. TURN, you may proceed.

MR. FREEDMAN: Thank you, your Honor.

Just for clarification, TURN has marked for identification exhibits TURN-4, 5-C, 6-C, and 7-C, all of which relate to the cross-examination of Mr. Bauder. And we intend to enter those into evidence in many cases

1 in lieu of cross-examination, which allowed us to
2 shorten the time we reserved for Mr. Bauder. And these
3 are comprised entirely of data responses from Southern
4 California Edison to TURN data requests in this
5 proceeding.

6 ALJ LAU: Thank you.

7 CROSS-EXAMINATION

8 BY MR. FREEDMAN:

9 Q Good afternoon, Mr. Bauder.

10 A Good afternoon.

11 Q I'd like to start with your rebuttal testimony,
12 exhibit SCE-09, starting on page 8 where you discuss the
13 Commission's reasonableness review standard.

14 A Right. I'm there. Thank you.

15 Q So based on this section, is it fair to say
16 that you are generally familiar with the standard
17 applied by the Commission for the purpose of
18 reasonableness reviews of decommissioning costs?

19 A Yes.

20 Q Would you agree that actions taken by Edison's
21 contractors, if found to be unreasonable, could serve as
22 the basis for a disallowance?

23 A Yes, I would agree with that. Edison's
24 responsible for the performance of its contractors.

25 Q So another way of saying that, would it be that

1 Edison is responsible for all decommissioning activities
2 whether conducted by its own employees or by
3 contractors; is that a fair summary?

4 A Yes, this is ultimately responsible.

5 Q And under what circumstances would Edison not
6 be responsible for an unreasonable action taken by its
7 contractor?

8 A I don't know that I can identify one directly.
9 I'm trying to imagine a scenario where a contractor
10 would be in a situation that wouldn't involve some
11 levels of oversight, but that certainly would not apply
12 in the decommissioning world or the nuclear world.

13 Q So the reasonableness standard is no different
14 based on whether Edison performs the work itself or
15 through a contractor; is that right?

16 A I believe that to be correct.

17 Q Okay. Let's move to Page 12 of your rebuttal
18 testimony. And specifically on Footnote 12 -- tell me
19 when you're there.

20 A Yeah, I'm looking at it. Thank you.

21 Q You refer to the -- hold on before we get
22 there. One moment.

23 Can I just have one moment off the record?

24 ALJ LAU: Yes, off the record.

25 (Off the record.)

1 ALJ LAU: Back on the record.

2 BY MR. FREEDMAN:

3 Q Let's move to page 3 before we go to Page 12.
4 So page 3 of your rebuttal testimony starting on line
5 21.

6 A Okay, I'm there.

7 Q On line 21 you state that:

8 The intervenors' positions ignore the
9 reasonableness of SCE's voluntary decision
10 to suspend FTO in order to conduct a
11 thorough evaluation.

12 Do you see that?

13 A Yes, I do.

14 Q If there had been no canister misalignment
15 event, would Edison have made the decision to suspend
16 FTO?

17 A If Edison had found out through expert reports,
18 through a review of the design of the system, through a
19 report by Holtec as the original equipment manufacturer,
20 in any way discovered the possibility that a canister
21 could have become hung up on a shield ring like it did
22 during downloading operations, Edison would have
23 suspended FTO, field transfer operations, and would have
24 gone through the actions listed here to fully understand
25 the situation and put corrective measures in place to

1 prevent it.

2 Q Was such a report being prepared at the time
3 Edison made a decision to suspend the FTO operations?

4 A I'm not sure I'm following your question. Was
5 such a report being prepared regarding what?

6 Q You're stating that if a report had been
7 prepared that Edison would have acted on it; is that
8 right?

9 A Absolutely.

10 Q Had a report been prepared that Edison was able
11 to act on?

12 A Are you referring to a specific report that
13 would point to a fuel -- a canister being hung up in the
14 cavity enclosure system?

15 Q I'll move on, Mr. Bauder. Never mind.

16 Let me ask this question instead: Would it
17 have been prudent for Edison to not have suspended FTO
18 after the canister misalignment event?

19 A No.

20 Q Okay. Let's go to Page 12 where we had
21 previously -- I'd previously drawn your attention to
22 Footnote 12. Are you there?

23 A I'm there. Thank you.

24 Q Footnote 12 refers to the Decommissioning Agent
25 Advisor. Can you define the Decommissioning Agent

1 Advisor and how it relates to Decommissioning Agent
2 Oversight?

3 A The Decommissioning Agent Advisor is a group
4 that is formed for the purpose of providing expert
5 advice, periodic reviews, and oversight to the San
6 Onofre decommissioning process. The Decommissioning
7 Agent Advisor has a charter, a chairman, and members
8 that can vary depending on the phase of decommissioning.

9 Q And how does that relate to Decommissioning
10 Agent Oversight? Is that the same thing, the DAO?

11 A No. No, the Decommissioning Agent Oversight
12 Organization is part of the internal oversight process.
13 It's a station to oversee decommissioning activities.

14 Q And the Decommissioning Agent Oversight, can
15 you say who is part of that group?

16 A Yes. You mean, as far as organizationally at
17 the station who is part of Decommissioning Agent
18 Oversight?

19 Q Yeah, what positions within the company are --
20 you don't need to give their names.

21 A I'm trying to refer to it in testimony here,
22 because I believe we covered it with an organizational
23 chart, so I'm looking right now. But the
24 Decommissioning Agent Oversight Organization consists of
25 a manager and personnel that are assigned to oversee the

1 work of decommissioning, whether it includes work
2 package execution, procedure reviews, direct field
3 oversight.

4 Q Has the structure of the DAO changed since the
5 fuel transfer incident?

6 MR. JERMAN: Let me interject.

7 Mr. Freedman, I'm not going to object, but I
8 just want to point out that the organizational aspects
9 are addressed in SCE-03, and that testimony's actually
10 sponsored by Mr. Bilovsky.

11 MR. FREEDMAN: Thank you, Mr. Jerman. I'm
12 interested in this as it relates to the fuel transfer
13 operations, so I do think it's relevant to Mr. Bauder's
14 testimony since he is sponsoring that specific topic and
15 Mr. Bilovsky is not.

16 THE WITNESS: So once again, I'm looking for
17 the appropriate pages in SCE-03, if you don't mind just
18 giving me a moment.

19 ALJ LAU: Let's go off the record.

20 (Off the record.)

21 ALJ LAU: Let's go back on the record.

22 BY MR. FREEDMAN:

23 Q So my question, Mr. Bauder, is whether the
24 structure of that organization has changed since the
25 fuel transfer incident?

1 A So the Decommissioning Oversight Organization
2 is listed on page 7 of SCE-03. It mentions some of the
3 things I did; decommissioning Phase 1 activities,
4 contractor performance, monitoring, work, scope, cost,
5 schedule, verified work has been completed properly, and
6 so on. Fundamentally, the Decommissioning Agent
7 Oversight Organization has not changed its composition
8 due to the fuel transfer operation suspension or the
9 incident of the canister hang up involving the
10 suspension.

11 However, as part of restarting FTO and putting
12 the right measures in place to assure that we didn't
13 have another incident of this type, the Decommissioning
14 Agent Organization was changed in some ways. And I'd
15 like to refer you to page 11 of SCE-03, if you don't
16 mind. So I'll read -- actually read starting at line 2
17 page 11.

18 After the completion of FTO project -- I'm
19 sorry, after the completion of the entire
20 FTO project, no spent nuclear fuel remained
21 in the pools. As a result, the spent fuel
22 pools and plant systems that supported them
23 are no longer needed, so many of the
24 personnel in the operations, engineering,
25 and maintenance organizations whose jobs

1 had focused on operating and maintaining
2 those systems are no longer needed.
3 Therefore, a reduction in force was
4 conducted.

5 ALJ LAU: Mr. Bauder, I would ask that you read
6 that again, because that was really quick. So I just
7 want to make sure our court reporter kept up.

8 THE WITNESS: Okay, so let me go back and level
9 set again with you, Mr. Freedman, starting on page 7.
10 Page 7 addresses, in Section 2, the Decommissioning
11 Oversight Organization. And that paragraph, in summary,
12 talks about overseeing the activities that I mentioned
13 before during fuel transfer operations. And I'm not
14 going to read through all of them again, but basically
15 ensuring procedures were conducted safely, such as work,
16 scope, cost, schedule, proper work authorizations, et
17 cetera. After fuel transfer operations were completed,
18 the Decommissioning Agent Oversight Organization was
19 changed, because those systems involving storing fuel
20 and other activities involving fuel movement were no
21 longer going to be taking place. So there was a
22 downsizing conducted at the station to facilitate that.

23 BY MR. FREEDMAN:

24 Q Okay, thank you.

25 And the reference in Edison in SCE-03 to

1 nuclear oversight on page 8 in that same section you've
2 been referencing, Section 5, is that also referred to as
3 the Nuclear Oversight Department?

4 A That's correct. And I would point out that
5 nuclear oversight, or the Nuclear Oversight Department,
6 is specifically an organization set up to meet the
7 Decommissioning Quality Assurance Program covered by
8 federal regulations and not part of what you earlier
9 referred to as DAO or Decommissioning Agent Oversight.
10 I realize it can get confusing until you look at an
11 organizational chart.

12 Q And Mr. Bauder, does Edison have a group that
13 engages in Holtec quality assurance, or is that an
14 entity that exists on the Holtec side?

15 A So I'm trying to not get too technical here,
16 but I'll describe it the best way I can. Under federal
17 regulations, the Code of Federal Regulations Part 50
18 Appendix B, Holtec, as an Appendix B vendor, is required
19 to have their own quality assurance program, and we
20 verify that through inspections, paperwork reviews, and
21 sampling parts of their program. So our job, from an
22 oversight perspective, was to make sure they had those
23 components of the program required by 10 CFR 50 Appendix
24 B, and not to have the program for them, if that makes
25 sense.

1 Q Okay, thank you.

2 Now, without disclosing any confidential
3 information, I would like to refer to a confidential
4 exhibit, but I just want to ask you a basic question
5 about it. So mindful, Mr. Bauder, that the report in
6 exhibit TURN-5-C has been claimed to be confidential by
7 Edison -- I'll give you a moment to look at that.

8 ALJ LAU: We can go off the record.

9 (Off the record.)

10 ALJ LAU: Going back on record. I am going to
11 mark and identify an exhibit, that would be exhibit
12 TURN-5, which is titled SCE, SDG&E -- sorry, excuse me.
13 That is titled "SCE Response to TURN Data Request 2
14 Question 6."

15 (Exhibit TURN-5 was marked for
16 identification.)

17 ALJ LAU: Mr. Freedman, you may proceed.

18 MR. FREEDMAN: Thank you.

19 Q Well, in anticipation of this document being
20 confidential, I really just had really just one question
21 for Mr. Bauder about it.

22 First of all, you are aware of the attached
23 report to exhibit TURN-5, which was produced by the San
24 Onofre Nuclear Generating Station Nuclear Oversight
25 Board?

1 A That's right.

2 Q Does Edison agree with the findings and the
3 conclusions and the observations reflected in this
4 report?

5 A So it's a lengthy report. The report consists
6 of recommendations, and then the practice that Edison
7 uses still under the Decommissioning Agent Advisory
8 Group, prior called Nuclear Oversight Board, that's why
9 you see the difference in title here on the cover, is to
10 evaluate the recommendations, respond to the group with
11 actions as deemed appropriate under our corrective
12 action program. So we don't take the report and simply
13 make actionable every recommendation in the report.]

14 Q Well, when receiving this, did Edison object to
15 or otherwise challenge any of the findings or
16 conclusions?

17 A So maybe I wasn't clear enough. When Edison
18 received this report, dated October 8th through 11th,
19 which was the board visit on-site and then received the
20 final report, Edison responds with a reply -- an
21 official reply to the Nuclear Oversight Board as to
22 actions that are being taken or will be taken and an
23 assessment of the board's recommendations.

24 The board is not a direct governing body. In
25 other words, Edison would not have to do everything that

1 the board says. It's an oversight process. Just one of
2 many.

3 Q Okay. Thank you. Okay. Let's go back to your
4 rebuttal testimony, Exhibit SCE-09, page 14.

5 A Okay. Is this the area titled Reasonableness
6 of SONGS -- no. I'm sorry. Wait a minute.

7 Q Yeah. This is your rebuttal testimony.

8 A Okay. I'm -- hang on. Okay. I'm there.

9 Q And specifically, at line 20, you state that:

10 The ISFSI agreement allowed Holtec to
11 control the means and methods for the
12 loading of spent fuel to the ISFSI pad
13 permitting Holtec to determine how best to
14 staff and operate the FTO campaign.

15 Do you see that?

16 A That's right.

17 Q Were there any additional costs incurred under
18 the Holtec contract due to the accident and extended FTO
19 schedule?

20 A Well, first, I wouldn't characterize it as an
21 accident. There was a potential for a nuclear canister
22 to drop, but the canister never dropped. And so we
23 suspended fuel transfer operations to remedy system
24 improvements, procedures, training, other items
25 mentioned in SCE-09 here to prevent that potential from

1 recurring again. So would not use the word "accident."

2 Now, during the suspension of fuel transfer
3 operations, we took actions to keep Holtec personnel
4 here, do retraining in preparation for fuel transfer
5 operations restart. We took procedural actions to make
6 the procedures more clear for many of the workers, and
7 we did a bunch of equipment improvements on the Holtec
8 equipment itself. So with respect to those things, we
9 were able to come to an agreement with Holtec to share
10 costs.

11 Q And so there were incremental costs, and those
12 costs were shared between Edison and Holtec?

13 A Holtec was faced with a fixed-price contract
14 that they strongly desired to complete, and Edison was
15 faced with, and Holtec agreed with, actions needed to be
16 taken to improve the execution of fuel transfer
17 operations subsequent to the incident. So there was
18 some dynamics here involving the contract that had to do
19 with retaining Holtec workers, ensuring we kept the
20 highest levels of quality in place for the point in time
21 when we would restart fuel transfer operations and then
22 Edison's costs for some of the things that we had to do
23 to keep fuel in the spent fuel pools, like additional
24 operational personnel, security personnel, maintaining
25 our systems in place through the decommissioning general

1 contractor as we awaited restart. So both Edison and
2 Holtec incurred costs through this period.

3 Q And --

4 A That's what -- I'm sorry. That's what I meant
5 when I said we essentially shared costs.

6 Q Okay. So under the contract, did Edison --
7 Edison didn't make additional payments to Holtec beyond
8 those that had been in the original contract, did it?

9 A That's correct.

10 Q And the additional costs that you just
11 referenced were the ones that Mr. Perez details in his
12 portion of the rebuttal testimony?

13 A That's right.

14 Q Did Edison seek to recover any additional costs
15 that it incurred resulting from the extended schedule
16 from Holtec itself?

17 A No.

18 Q Why not?

19 A Because, as I mentioned, Holtec had a strong
20 desire to successfully and safely complete fuel transfer
21 and so did Edison. Edison had ongoing costs related to
22 the items I mentioned already. Holtec had their own
23 costs under the fixed-price contract because they were
24 spending money to keep people here to make improvements
25 in some of the machinery and made personnel, you know,

1 do personnel training and procedure work. And so both
2 organizations obviously had costs, but in the end,
3 Holtec was able to keep their personnel here,
4 successfully restart fuel transfer, and -- I hopefully
5 answered your question, but I think what you're getting
6 at is did one organization pay the other in terms of
7 completing fuel transfer.

8 Is that what you're --

9 Q I'm asking why Edison didn't seek to recover
10 incremental costs associated with the incident from
11 Holtec?

12 A The contract was written such that Edison paid
13 Holtec under a fixed-price contract milestone payments
14 for moving fuel canisters. When the canister fuel
15 movement stopped, Holtec was faced with a pause in the
16 work as was Edison. So for those reasons, in the end,
17 there was no reason for Edison to seek additional
18 remedies from Holtec.

19 Q And is that because Edison was concerned on the
20 impact it might have on Holtec?

21 A Well, you could postulate that there would be
22 an operational concern of imposing penalties on Holtec
23 during an operation where you're trying to jointly
24 improve. You could postulate that. But in fact, in my
25 mind, Holtec had their reputation to uphold. They're a

1 large contractor. They have been very successful. They
2 do this type of work not just in the U.S. but all over
3 the world, and they had a very strong desire to complete
4 the project and also receive the remaining milestone
5 payments for doing that.

6 Q But the alternative to seeking it from Holtec
7 was to pull it out of the trust fund, right?

8 A I'm not sure if I'm following that line of
9 thinking.

10 Q The alternative to seeking incremental costs
11 associated with the fuel transfer incident from Holtec
12 was to finance those costs out of the decommissioning
13 trust funds, right?

14 A I don't think I would agree with that. Edison
15 did not finance Holtec's increased costs.

16 Q Well, Mr. Bauder, we already went over that
17 there were increased costs there detailed by Mr. Perez.
18 They are typically undistributed costs, correct?

19 A Those are Edison costs for things like
20 maintaining the security staff while the spent fuel
21 remained in the spent fuel pools longer, for things like
22 maintaining the spent fuel pool systems, for things like
23 keeping operators in the control room at the station,
24 things like maintaining the programs to the
25 decommissioning general contractor that are needed to

1 keep the site as a protected area and the like. And I
2 believe Jose Perez will be able to lay out those costs
3 probably better than I am here. But those costs were
4 Edison costs to keep the plant in a safe condition and
5 be ready for fuel transfer when it was to restart.
6 Those were not Holtec costs.

7 Q Well, is it Edison's general position that it
8 would never seek to recover incremental costs that it
9 incurs if there is a performance issue by a contractor?

10 MR. JERMAN: I'm going to object to the
11 question. I think we're getting outside the scope of
12 Mr. Bauder's testimony here. He's pointed out that Mr.
13 Perez is the witness who actually addresses the specific
14 costs of this incident --

15 (Crosstalk.)

16 MR. JERMAN: -- costs belong in. Sorry. And
17 also, I'd like to add that I believe the question is
18 argumentative at this point as well. Thank you.

19 MR. FREEDMAN: Your Honor, I'm trying to
20 clarify Edison's position with respect to its
21 relationship with its contractors, which is not an issue
22 that Mr. Perez appears to be sponsoring.

23 ALJ LAU: I think Mr. Bauder can actually
24 answer the question to the best of his knowledge, and he
25 has the costs. I would be -- I would like Mr. Bauder to

1 answer to the best of your knowledge to Mr. Freedman's
2 questions.

3 THE WITNESS: Yes, your Honor.

4 So for Edison, in general, there have been
5 cases where we have sought damages from contractors for
6 all types of things, failure to perform, as you might
7 guess. We have a large footprint with many contractors
8 that we use across the company. You mentioned Edison.
9 There are other cases where we do not seek damages from
10 contractors. And I think, as you know, most contracts
11 do not provide for consequential damages anyway.

12 So the situation we were in here was we wanted
13 to keep Holtec engaged to complete the project. Holtec
14 wanted to stay engaged to complete the project. And so
15 there was no reason to seek final payment for costs
16 directly from Holtec for the extension and the delay in
17 fuel transfer operations.

18 Q Okay. Thank you, Mr. Bauder. Let's go back to
19 your rebuttal testimony, page 15.

20 A Okay. I'm there. Thank you.

21 Q At the very top of the page, you reference the
22 initiation by Edison of multiple reviews with
23 third-party support from a specialty engineering firm
24 called MPR; is that right?

25 A That's right.

1 Q And I'd like to just reference at this point
2 what has been previously marked as Exhibit TURN-6C which
3 may have a name change or may not depending on
4 subsequent conversations.

5 Does this -- does this exhibit contain both a
6 narrative response to a TURN data request and one of the
7 two MPR reports that are referenced in your testimony?

8 A So I'm looking through it now. Yes, it
9 contains a report titled Effectiveness of
10 Decommissioning Agent Organization. Subtitle, Oversight
11 of ISFSI.

12 Q Yeah. And you've reviewed this before, have
13 you not, since it is addressed to you with a cover page?

14 A Yes. That's right.

15 Q Does Edison agree with the findings and the
16 observations in this report?

17 A So Edison took the findings of the observation
18 in this report. Many of them were entered into the
19 corrective action program. Some were acted on
20 appropriately. Some involved discussions with MPR as to
21 their final conclusions and effectiveness. And some
22 were not implemented. But every single item that was
23 appropriate to effectively and safely restarting fuel
24 transfer was included in the corrective action system at
25 Edison for implementation.

1 Q Okay. Thank you. Let's go back to your
2 rebuttal testimony, page 24.

3 A Okay. I'm there.

4 Q Starting on line 14 through line 17, you
5 discuss the NRC-issued violations for the fuel transfer
6 oversight operations incident. The violation for the
7 loss of redundant drop protection, what severity level
8 was that?

9 A That resulted in an severity level 2 violation.

10 Q And the other violation, failure to make a
11 required notification, what level was that?

12 A Severity level 3.

13 Q Has the NRC ever previously issued a level 2
14 violation to Edison for San Onofre?

15 A Not to my knowledge. I don't have a full
16 recollection of the full history of the plant, but not
17 to my knowledge.

18 Q So that particular violation would be the most
19 significant in the history of the facility?

20 A I think it would be presumptive for me to
21 answer that, because I just don't know historically what
22 sorts of violations may have occurred even before I
23 started work at Edison in 2009.

24 Q But you can't -- you can't point to a prior
25 episode that was at that same severity level or greater?

1 A No, I cannot.

2 Q Okay. Let's keep going in your rebuttal
3 testimony to page 30.

4 ALJ LAU: Can I clarify -- ask a clarifying
5 question. So what are the different levels of violation
6 and which one signifies it's a higher violation or more
7 serious violation?

8 THE WITNESS: Sure, your Honor. So there's two
9 different processes the NRC uses. For operating plants,
10 they use an action matrix, which I'm really not going to
11 get into here. For a shutdown facility and
12 decommissioning like ours, they use a severity level
13 system. Severity level 1 being the highest and down to
14 severity level 4 which is a low-level violation. So 1
15 through 4.

16 ALJ LAU: Okay. What -- based on your
17 professional experience and expertise, what qualifies as
18 a 1?

19 THE WITNESS: In this particular case, what
20 could have potentially qualified as a 1 would be if the
21 canister had actually dropped.

22 ALJ LAU: And opened?

23 THE WITNESS: And opened up or some other
24 consequential result which would have potentially
25 threatened the health and safety of workers and/or the

1 public.

2 ALJ LAU: Okay. Thank you. That's all I have.

3 MR. FREEDMAN: Thank you, your Honor.

4 Q Mr. Bauder, I'd like you to turn to page 30 of
5 Exhibit SCE-09.

6 A Okay. I'm there. Thank you.

7 Q In this section, you discuss Edison's proposal
8 for changing the flow of money related to the Department
9 of Energy litigation proceeds. So am I correct in
10 understanding that Edison's proposal is to deposit its
11 share of all future proceeds into the non-qualified
12 trusts at San Onofre?

13 A That's right. Through the existing ERRA
14 mechanism.

15 Q And that would include the non-qualified trust
16 funds for SONGS Unit 1, 2 and 3?

17 A That's right.

18 Q Keeping that in mind, can I ask you to turn to
19 Exhibit SCE-07, which was your direct testimony
20 addressing this issue.

21 A Sure.

22 Q And it's tabled at -- Mr. Parker asked you to
23 look at -- on page 6. You can tell me when you're
24 there.

25 A I'm at table -- I think you're referring to

1 table 3-1.

2 Q Yes. So do you see on line 5 there's a
3 reference to a claim of \$168 million covering the period
4 of 2017 to mid-2018?

5 A That's right.

6 Q And the status is -- was this -- pending. Has
7 there been any update on the status of this claim since
8 you submitted this testimony?

9 A Not to my knowledge.

10 Q Does Edison have a timeline under which it
11 expects to receive some kind of resolution?

12 A Not to my knowledge. I think the timelines are
13 somewhat flexible depending on the round of litigation.

14 Q Okay. Does Edison intend to continue to seek
15 compensation from the Federal Government for its breach
16 of the standard contract?

17 A Yes.

18 Q So the six rounds that are listed here don't
19 represent the sum total of Edison's present and future
20 claims against the Federal Government, does it?

21 A I believe that's correct. It does not. As
22 long as the Federal Government fails to meet its
23 obligation under the Waste Policy Act.

24 Q Okay. Let's go back to your rebuttal
25 testimony, Exhibit SCE-09, page 31.

1 A Okay. I'm there. Thank you.

2 Q On line 14, you state that, "Approval of
3 Edison's proposal utilizes the DOE litigation proceeds
4 to fund the NDTs for spent fuel storage thereby avoiding
5 the need to restart collections from future customers."

6 Do you see that?

7 MR. JERMAN: I'm going to object. It's outside
8 the scope. This is Mr. Perez's testimony.

9 ALJ LAU: Is there any relevance, Mr. Freedman?
10 You can -- how about you reserve that for Mr. Perez?

11 MR. FREEDMAN: My understanding is that
12 Mr. Bauder is sponsoring the section of this testimony.
13 In fact, he's listed as the sponsor for the DOE
14 litigation proceed section of SCE-09.

15 ALJ LAU: Mr. Jerman, I think that that's my
16 understanding too, if I look at the table of contents.

17 MR. JERMAN: Oh. You're right. My mistake. I
18 apologize.

19 ALJ LAU: Mr. Freedman, go ahead. Can you
20 restate your question.

21 BY MR. FREEDMAN:

22 Q Do you see that line that I just read into the
23 record, lines 14 and 15 on page 31?

24 A Right. Starting with "Approval of SCE's
25 proposal"; is that what you're referring to?

1 Q Yes.

2 A I do.

3 Q We do not need to read it into the record
4 again. So is the only purpose for which these funds
5 could be used would be to cover incremental spent fuel
6 storage costs that cannot be funded out of the qualified
7 trust funds?

8 A So the flow path of money here, dollars, as I
9 understand it, is to refund DOE litigation proceeds back
10 to the non-qualified trust, continue to use the
11 qualified trust for decommissioning activities and for
12 fuel storage activities until the point that the
13 qualified trust would be depleted and then use a
14 non-qualified trust. So I'm not sure if I answered your
15 question directly, but I think -- I believe that's the
16 strategy here that is being proposed.

17 Q My question is, is Edison proposing to enforce
18 some kind of limitation on the use of these funds so
19 that they may only cover costs related to long-term
20 spent fuel storage?

21 A That's the intent of Edison's proposal. I
22 don't know if within the bounds of our nuclear
23 decommissioning trusts the dollars could only be used
24 for spent fuel pool storage, but I need to take that
25 under review actually because I can't answer it

1 directly.

2 Q Well, Mr. Bauder, you do sort of answer this on
3 the next page of your rebuttal testimony on page 32.

4 And you reference on line 2:

5 It is Edison's intent to assure there are
6 sufficient funds in the NDTs to cover the
7 decommissioning of SONGS including the
8 long-term storage of spent fuel.

9 A Right.

10 Q So is Edison proposing that this money could
11 only be used to cover spent fuel storage costs?

12 A No, I don't think so, but I think it's
13 important as part of that answer to understand that
14 Edison intends to use dollars from the qualified trust
15 first before utilizing dollars from the non-qualified
16 trust, thereby, to the extent possible, keeping intact
17 the mechanism to continue to pay for the storage of fuel
18 from the non-qualified trust in later years.

19 Q So I'd like to have you turn to what's been
20 marked as Exhibit TURN-4, one of the cross-exhibits that
21 was circulated. This is -- remains public. And
22 specifically, I'd like you to turn to the second data
23 response in this packet, which is Edison's response to
24 TURN Data Request Set 2, Question 9.

25 A Okay. The one titled Data Request, Set TURN

1 SCE-02?

2 Q 002, but it's Question 9.a-b.

3 A A-b. I'm there. Uh-huh.

4 Q And this is prepared by Mr. Perez, but this
5 does address specifically your testimony. So I assume I
6 can ask you about it?

7 A Sure.

8 Q Do you see in response to Question 9.a, the
9 second sentence states that:

10 However, if future conditions warrant
11 restart of the Commission-approved
12 collections, then SCE could utilize the
13 newly deposited funds in the NQNDTs for
14 activities other than spent fuel management
15 in lieu of collections?

16 Do you see that?

17 A Yes. I believe that's what I just covered in
18 terms of the qualified trust would be depleted first and
19 then activities involving -- that needed to be covered
20 or paid for would come out of the non-qualified trust.

21 Q And is Edison proposing a special process for
22 seeking authorization to spend money from the
23 non-qualified trust, or would it use the same advice
24 letter process that currently governs all trust fund
25 disbursements?

1 A I don't know of a plan to change away from the
2 current advice letter process. I will point out that
3 these dollars collected from DOE litigation proceeds
4 will still, under Edison's proposal, go through the ERRA
5 process under a current CPUC decision before going into
6 the memorandum account associated with funding the
7 non-qualified trust.

8 Q And what's the relevance of that process under
9 Edison's proposal?

10 A The relevance in my -- in the process and in my
11 answer was it would still give the Commission control
12 over the funding into the memorandum account and
13 ultimately non-qualified trust through the ERRA
14 proceedings.

15 Q When you say "gives the Commission control,"
16 isn't Edison asking the Commission to adopt its position
17 in this case which would direct how those funds are
18 ultimately channeled into the trust funds?

19 A Yes. I'm just mentioning that the funds would
20 first still go through the -- to ERRA -- through the
21 ERRA decision, which is existing now, and then go to the
22 appropriate non-qualified decommissioning trust,
23 therefore, in my mind, giving the Commission some
24 control over that -- I'll call it flow of money.

25 Q So does that mean that intervenors could object

1 to this treatment and litigate the issue of where the
2 money goes in the ERRA proceeding?

3 A I'm not sure how to directly answer your
4 question. I think that intervenors have the ability to
5 object to any part of the proceeding.

6 Q So this issue under Edison's proposal could be
7 continually relitigated in the ERRA case?

8 A Potentially, I suppose it could. Would it? I
9 think the probability is low.

10 Q Going back to your rebuttal testimony on page
11 33.

12 A Okay. I'm there.

13 Q Starting on line 4, you state, "Excess funds in
14 the trust can only be identified once the
15 decommissioning project for SONGS is complete."

16 That would be true for funds either in the
17 qualified trust or in the non-qualified trust, correct?

18 A That's right. And it's Edison's objective to
19 return all excess funds to the customer when the entire
20 project is complete and the fuel is removed from San
21 Onofre.

22 Q So why is Edison proposing to deposit the
23 litigation proceeds into the non-qualified trust rather
24 than the qualified trust?

25 A So it's my understanding that they would

1 require a special and particular IRS tax ruling to be
2 able to deposit the proceeds into the qualified trust
3 versus the non-qualified trust, which is the reason the
4 non-qualified trust was selected.

5 Q And do you know what the basis of that ruling
6 would be? Would Edison need to make a certain showing?

7 A I -- we're getting into tax rules here, but I
8 think that it has to do with Edison potentially being
9 taxed on the gain of the -- excuse me -- Edison
10 potentially being taxed on the litigation proceeds as a
11 gain before depositing those dollars into the qualified
12 trust versus not paying those taxes as a gain from
13 litigation proceeds if they go into the non-qualified
14 trust. I believe I have that correct, subject to
15 review.

16 Q Has that been explained in your testimony
17 anywhere?

18 A No. I just happen to know that we -- I
19 initially asked the team to look and see if we would
20 need an IRS private letter ruling for the method that
21 we're proposing here, and I was told that we don't. And
22 I believe that's the rationale for it.

23 Q But if there is a tax hit on the front end for
24 the qualified trust, doesn't the tax hit get reversed
25 when the money comes out of the trust?

1 Before recess, Mr. Freedman from TURN finished
2 his line of questions. Now we have Ms. Babiarz from
3 Public Watch Dogs.

4 Ms. Babiarz, you may begin.

5 MS. BABIARZ: Thank you, Judge Lau.

6 Good afternoon, everyone. My name is Nina
7 Babiarz, I'm Director of Development for Public Watch
8 Dogs. And I initiated this particular line of
9 questioning because the Public Watch Dogs' forensic
10 analysis was an approved scope. And within our forensic
11 analysis of the triennial review, we were looking for a
12 specific expenditure; and we couldn't find it, actually.

13 It was by the omission of the named expenditure
14 by the California Coastal Commission, which was the
15 Independent Third Party Inspection and Maintenance Plan
16 by LPI, requirement of Special Condition Number 19, that
17 could not be found. And so, that sent a red flag up as
18 to why. We knew that the expenditure was -- at least,
19 the product was delivered by LPI June 12th of 2020.

20 And so, I proceeded to --

21 MR. JERMAN: Your Honor, I'm going to object.

22 I mean, the purpose of this portion of the
23 hearing is cross-examination. And it sounds like
24 Ms. Babiarz is attempting to supplement Public Watch
25 Dogs' direct testimony here.

1 MS. BABIARZ: Not at all. It was an
2 introduction. Actually, my next statement was going to
3 be that I had 6 or 7 questions that the Public Advocacy
4 representative already asked. And so, I was planning to
5 nix those 6 or 7 questions, Judge Lau, and -- you know,
6 just to reduce the redundancy. I do have -- would like
7 clarification on a couple of answer that Mr. Bauder
8 provided in the answer to a couple of those questions,
9 however.

10 ALJ LAU: I would say, Ms. Babiarz did not ask
11 any questions. And she's simply made statements.

12 So please continue, Ms. Babiarz.

13 MS. BABIARZ: Thank you. Thank you, Judge Lau.

14 CROSS-EXAMINATION

15 BY MS. BABIARZ:

16 Q Mr. Bauder, thanks so much for taking the time
17 to be with us today on this important occasion.

18 And you indicated that you started -- you were
19 hired by Southern California Edison in February 2009.
20 And you also indicated that you were promoted to the
21 position of Chief Nuclear officer, I believe you said --
22 and I'm only asking for clarification because when you
23 gave the answer, it didn't -- it sounded like late 2018
24 or late 2019.

25 So, I just need a clarification on that date of

1 which you started as Chief Nuclear Officer?

2 A Okay. Thank you.

3 Just for clarification, I don't think I said
4 "promoted" to Chief Nuclear Officer. I was relocated
5 here, or moved here. Unfortunately, I didn't receive a
6 promotion. But it was the end of November in 2018, is
7 my best recollection.

8 Q Thank you very much, Mr. Bauder.

9 And prior to that -- well, you didn't call it a
10 promotion -- but prior to that particular position, you
11 indicated that your title was also VP of Operation
12 Services and -- prior to that; correct?

13 A That's right.

14 Q And so, I'm witnessing a number of
15 responsibilities that you have. I'm just providing a
16 couple of examples.

17 Obviously, the State Lands Commission, FEIR,
18 that was needed in order to get the decommissioning
19 permit, I know you were a lead on that. As well as, for
20 example, something as simple as the Community Engagement
21 Panel meetings, where I believe Tom -- your predecessor
22 was Tom Palmisano, was it not? -- and, you know,
23 basically run those meetings, or...?

24 A I'm trying to follow your question. So, let me
25 take -- so, for the purposes of the Community Engagement

1 Panel, Tom Palmisano preceded me. He was also the Chief
2 Nuclear Officer prior to my current position --

3 Q Correct.

4 A -- regarding the State Lands, I was not the
5 lead on the FEIR. But I did present on behalf of Edison
6 at the State Lands Commission meeting regarding the EIR,
7 which was on or about March of 2019.

8 Q It was. I was there, so...

9 And so, question: Were you also the lead in
10 the Southern California Edison Application for the
11 decommissioning permit from the California Coastal
12 Commission?

13 A Lead, meaning? -- I'm not -- I'm having
14 trouble the with the term "lead." I did not lead out
15 the application. The application process started well
16 before I returned to San Onofre in my current position.

17 Q Well, I have the filing date of that as May 7
18 of 2019. That's why I was asking.

19 I'm assuming that you, as Chief Nuclear Officer
20 at the end of 2018, have been involved in filing the
21 application for the decommissioning permit?

22 A That's right. So I went -- I did approve and
23 file the application on behalf of Edison for the Coastal
24 Development Permit. And then that hearing, ultimately,
25 was held in October of 2019. I thought you were

1 referring to the entire process as to initiating it.

2 The initiation of the process started well before I came
3 back to work at San Onofre.

4 Q No. I was just referring to the application --

5 A Yeah.

6 Q -- filing, so -- thank you.

7 In such then, I'm assuming that you're familiar
8 with the addendum that the California Coastal Commission
9 issued three days before the October 17th meeting, 2019.
10 The addendum was a staff report that indicates that
11 Edison approved and agreed to accept the content of
12 Special Condition Number 19?

13 MR. JERMAN: Objection. This is outside the
14 scope of Mr. Bauder's testimony. And it's also not
15 relevant to the proceeding.

16 MS. BABIARZ: Well, it is an item, Judge Lau,
17 that was approved within our forensic analysis. That's
18 the only reason I'm asking a question, is to lead us to
19 what we were able to...

20 ALJ LAU: Can you -- I think we need to
21 establish more foundation and relevance to what is
22 Special Condition 19; and how is that relevant to the
23 scope of this proceeding.

24 MS. BABIARZ: Okay. Thank you.

25 Special Condition Number 19 was issued by the

1 California Coastal Condition, and agreed to by Southern
2 California Edison, as a condition to the demolition and
3 permit that allowed for the demolition of all of the
4 aboveground structures. And Special Condition Number 19
5 required that Edison fund an independent, third-party
6 review of Edison's inspection and maintenance plan.

7 And so, our initial inquiry with our forensic
8 analysis was: Where within the 2020 expenditures did
9 that particular funding -- you know, did that particular
10 \$115,000 expenditure come? We knew what the date was;
11 we knew what the amount was; we knew what the purpose
12 was; but we couldn't find it within our forensic
13 analysis. So it prompted us to try to find exactly
14 where it was. And I was directed by --

15 MR. TRIAL: Your Honor --

16 (Crosstalk.)

17 (Reporter clarification.)

18 MR. TRIAL: Your Honor, this is Allen Trial
19 from SDG&E. I object that this is turning out to be
20 testimony by a person doing the cross.

21 Could they ask a question for clarify of the
22 record, please?

23 ALJ LAU: I do agree --

24 MS. BABIARZ: Okay.

25 ALJ LAU: -- we're getting into --

1 MS. BABIARZ: Okay --

2 (Crosstalk.)

3 BY MS. BABIARZ:

4 Q Why -- why, Mr. Bauder, did Southern California
5 Edison change the name of the expenditure from a
6 third-party independent inspection and maintenance plan
7 to the term "aging management," which was confirmed by
8 the California Public Utility Commission Energy Division
9 for that expenditure?

10 Why -- why the name change?

11 MR. JERMAN: Objection. We disagree with the
12 characterization of the name change. But, more
13 importantly, the issue that Ms. Babiarz is referring to
14 is addressed by Mr. Perez in SCE-09.

15 And also, your Honor, the issue of these costs
16 related to a third-party study, it's also addressed in
17 SCE and SDG&E Joint Exhibit 1, which explains that the
18 aging management costs are not at issue in this NDCTP.
19 They will be at issue in the 2027 NDCTP, because that
20 project is not expected to be complete until 2024. So
21 that's --

22 MS. BABIARZ: I would just --

23 ALJ LAU: I --

24 (Crosstalk.)

25 (Reporter clarification.)

1 MS. BABIARZ: Certainly.

2 My statement is that the change of the name is
3 what made us look for -- continued to look for the
4 expenditure that we were questioning. And the
5 validation of the name change came from the California
6 Public Utilities Commission Energy Division, Mr. Zizmor,
7 who was administering the funds and pointed to where we
8 could find the expenditure under the name that it had
9 been changed to.

10 ALJ LAU: So, Mr. Jerman already said that Mr.
11 Bauder is not sponsoring those -- you know, that portion
12 of testimony discussing funds. So, I would suggest that
13 we look more directly into the testimony sponsored by
14 Mr. Bauder, and if you have questions specifically
15 towards testimony that Mr. Bauder sponsored.

16 MS. BABIARZ: Well, his earlier testimony today
17 indicates that he sponsored the specific information
18 with regard to the scratches and gouges on the cans,
19 which is the relevance of the report.

20 ALJ LAU: I believe we were -- you were asking
21 him about costs. And Mr. Jerman said Mr. Perez is the
22 one presenting the costs --

23 MS. BABIARZ: Right --

24 (Crosstalk.)

25 MS. BABIARZ: And the reason that we were

1 extending this question to Mr. Bauder is because the
2 recommendations were not accepted by Edison. And we
3 thought that the expenditures should be nullified.

4 ALJ LAU: Which recommendations are you talking
5 about?

6 MS. BABIARZ: The deliverable report that was
7 required by the California Coastal Commission.

8 ALJ LAU: Was that discussed in Mr. Bauder's
9 testimony?

10 MS. BABIARZ: I believe that it was, since he
11 was answering questions earlier specific to the
12 scratches and gouges, ma'am.

13 ALJ LAU: I don't find the relevance. So you
14 either establish a relevance, or I will sustain Mr. -- I
15 don't -- I forgot whose objections -- the objections of
16 Mr. Trial and Mr. Jerman, and have you -- ask that you
17 continue with another line of questions.

18 MS. BABIARZ: I guess, the only relevance is
19 that they refused to honor the recommendations of the
20 report.

21 ALJ LAU: Which report are you talking about?

22 Is that discussed in Mr. Bauder's testimony?

23 MS. BABIARZ: The -- the condition of the
24 permit that was approved by the California Coastal
25 Commission for the decommissioning and the demolition of

1 all aboveground structures.

2 ALJ LAU: It would be helpful if you can point
3 to Mr. Bauder's testimony. If not, then I will have to
4 sustain their objection and ask that you move to a next
5 line of questions.

6 Do you want to go off the record for you to
7 look?

8 MS. BABIARZ: I would appreciate that.
9 Thank you.

10 ALJ LAU: Let's go off the record.

11 (Off the record.)

12 ALJ LAU: Let's go back on record.

13 So, the objections of Mr. Jerman and Mr. Trial
14 are sustained. And Ms. Babiarz will begin the next line
15 of questions for Mr. Bauder.

16 Actually, it seems like there is a change of
17 counsel.

18 Mr. Langley, are you --

19 MR. LANGLEY: Yes, I --

20 (Crosstalk.)

21 MR. LANGLEY: Ms. Babiarz, are you done with --
22 yes; she has completed her questions. And I have one
23 pretty simple question.

24 ALJ LAU: Thank you, Mr. Langley.

25 You may proceed.

1 MR. LANGLEY: And if it's outside the scope,
2 I'm sure you'll let me know.

3 CROSS-EXAMINATION

4 BY MR. LANGLEY:

5 Q We submitted five pages of testimony prior to
6 this hearing. And on page 2, there's a comparison of
7 nuclear decommissioning trust funds. And it shows that
8 the SONGS DTF, Decommissioning Trust Fund, is
9 \$4.7 billion. Then it shows two other decommissioning
10 trust funds, one from Indian Point and one from Oyster
11 Creek, that are around \$1 billion.

12 And I'm wondering if Mr. Bauder could explain
13 why there is more than a \$3-billion delta between the
14 SONGS budget and these other power plants that are
15 decommissioning?

16 MR. JERMAN: And I would object as outside the
17 scope of Mr. Bauder's sponsored testimony.

18 ALJ LAU: I do agree. But I -- I'm just
19 curious if Mr. Bauder has any -- you know, has any guess
20 as to how these other, I don't know -- as from your
21 industry expertise, how these other power plant, you
22 know, costs were established, or whatnot. And you don't
23 have -- if you don't know, just say you don't know.

24 THE WITNESS: I don't -- what I don't know is
25 the rationale behind the listed amounts here regarding,

1 as noted, Indian Point, Palisades, and Oyster Creek. I
2 don't know that rationale.

3 I do know the rationale behind our
4 decommissioning trust fund. And that rationale is
5 supported by decommissioning cost estimates, were
6 approved -- which are approved by this Commission every
7 three years. And, further, I would state that any
8 excess in our funds clearly go back to customer. And I
9 would say it's a much more healthy environment to have
10 -- have a solidly-funded trust and be able to
11 effectively and safely complete a decommissioning at a
12 station than to have the opposite of that.

13 Furthermore, I will tell you that the NRC has
14 minimum required trust fund amounts that are governed by
15 regulation. And then some states, like California, have
16 the DCE process, which results in, typically, higher
17 trust fundamentals to cover the entire decommissioning
18 activity. And so, I actually think that's a healthier
19 way to run the process.

20 ALJ LAU: Thank you, Mr. Bauder.

21 I think that's sufficient in terms of what --
22 you know, what the witness knows.

23 Mr. Langley, do you have another question?

24 MR. LANGLEY: I do not. Thank you very much.

25 ALJ LAU: Is Public Watch Dogs finished with

1 their line of questioning for Mr. Bauder?

2 MR. LANGLEY: We are.

3 ALJ LAU: Thank you.

4 Then, Mr. Geesman, are you ready to begin your
5 line of questions?

6 MR. GEESMAN: I am, your Honor.

7 ALJ LAU: Okay. You may proceed.

8 CROSS-EXAMINATION

9 BY MR. GEESMAN:

10 Q Good afternoon, Mr. Bauder.

11 A Good afternoon.

12 Q I would like to try to confirm what you
13 previously testified to as to precisely when you took on
14 your current responsibilities.

15 I believe you've said that in late
16 November 2018, you became responsible for the management
17 of the SONGS decommissioning, and you also became
18 Edison's Chief Nuclear Officer; is that correct?

19 A That's right. It was on or about late
20 November 2018.

21 Q I also think you testify that Tom Palmisano was
22 your predecessor.

23 Was he your predecessor in both of those
24 capacities?

25 A In -- I'm sorry. "Both," meaning what? -- what

1 positions?

2 Q Management of the SONGS decommissioning and
3 Edison's Chief Nuclear Officer?

4 A Yes.

5 Q Was there any overlap between the two of you
6 time wise?

7 A Yes. After I reported back to San Onofre in,
8 as we've stated, November of 2018, Tom Palmisano and I
9 went through a turnover process so I could understand,
10 you know, some of the activities that were ongoing, some
11 of the processes that were in place. And, furthermore,
12 Tom kept the community engagement piece for several more
13 months through, I believe, his conduct of the March, or
14 first quarter, CET meeting -- public meeting, before I
15 took on the entire set of responsibilities around SONGS;
16 so it was an integrated turnover process.

17 Q And why did Edison choose to make the change in
18 leadership?

19 A I think, for a couple reasons. Clearly, we
20 wanted to have more minds and skills and more focus on
21 effectively restarting the fuel transfer operations
22 process. And then also, simply, Mr. Palmisano was ready
23 to move on and do other things. And that's exactly what
24 he did.

25 Q Did you have any involvement in the SONGS

1 decommissioning prior to November of 2018?

2 A So, in my prior position of Vice President of
3 Operational Services, I was responsible for approving
4 major contracts for the company. One of those contracts
5 happened to be the fixed price contract for the
6 decommissioning itself, which -- which I signed on or
7 about December of 2016. And then, further, from a --
8 just from a pure contract review standpoint, my -- I was
9 responsible for reviewing and approving, from the point
10 of view of a Chief Procurement Officer, the Holtec
11 contract, as well. And I can't remember that time
12 frame.

13 Q Could you take a look at the exhibit that's
14 been marked A4NR-X-3, which is a 5-page excerpt from the
15 transcript of the March 28th, 2019 Community Engagement
16 Panel meeting?

17 A If you just give me a moment.

18 Q Yes.

19 A Okay. I found it. A4NR, you said "X-3"?

20 Q That is correct.

21 A Okay.

22 Q Now, Mr. Palmisano and a gentleman named Scott
23 Morris, who is the NRC Region Four Administrator, makes
24 some remarks about the reporting violation. First, Mr.
25 Palmisano offers an explanation that runs from the

1 middle of transcript page 45 to the middle of transcript
2 page 47. Those are the pages of the exhibit.

3 Could you please take a minute to read that to
4 yourself?

5 A Sure. Thank you.

6 Q Now, you were present at the March 28th, 2019
7 Community Engagement Panel meeting, were you not?

8 A That's right.

9 Q The transcript doesn't record you as adding
10 anything to Mr. Palmisano's explanation.

11 Would it be correct to assume that you consider
12 his explanation to be accurate?

13 MR. JERMAN: I'm going to object to the
14 foundation on this exhibit. It does not identify
15 Mr. Palmisano as the speaker of the passage starting on
16 page 45. And I believe it identifies, on line 7, a
17 Mr. Taylor as the speaker.

18 ALJ LAU: Mr. Geesman, I sort of agree with Mr.
19 Jerman that the foundation of this exhibit needs to be
20 more clear that this is Edison who is speaking.]

21 MR. GEESMAN: Okay, your Honor. I'll move on.

22 ALJ LAU: Okay.

23 BY MR. GEESMAN:

24 Q Let's go to the exhibit A4NR-X-4.

25 A Okay, thank you. I have it in front of me.

1 Q It's page 85 of the transcript of the March
2 28th, 2019, Community Engagement Panel meeting, and it
3 has Mr. Morris, an NRC Region IV administrator, saying
4 at line 3, and I quote, "It's only when there's a
5 performance issue, the challenge and incident, that's
6 when we come dig deep, because the responsibility's on
7 the owner, operator, licensee to operate in a manner
8 consistent with a licensing issue. So we have a graded
9 approach. We do baseline inspections, and then we dig
10 in deep when we find out. That's why that reporting
11 violation that Tom talked about is so critical, because
12 we don't know what we don't know."

13 Did you understand Mr. Morris's concern, "we
14 don't know what we don't know," to be a primary driver
15 behind the NRC's elevation of the reporting violation?

16 MR. JERMAN: Objection. Foundation. This
17 document does not identify Mr. Morris as the speaker or
18 his affiliation with NRC or any other entity.

19 ALJ LAU: Yeah. Mr. Geesman, I'm sorry, but
20 this does not -- is also not very clear Mr. Morris is
21 speaking, and I don't know who Mr. Morris is.

22 BY MR. GEESMAN:

23 Q Mr. Bauder, do you recollect who Mr. Morris is?

24 A Yes, Mr. Morris is a regional administrator,
25 Nuclear Regulatory Commission or NRC Region IV.

1 Q Do you recall him making this comment at the
2 March 28th Community Engagement Panel meeting?

3 A No, I don't.

4 Q Let's move on.

5 Let's go to A4NR-X-5, which is also an excerpt
6 from the transcript of the March 28th, 2019, Community
7 Engagement Panel meeting.

8 A Right, I have it in front of me. Thank you.

9 Q It contains an exchange between the NRC's Linda
10 Howell and Mr. Palmisano beginning at line 18 of
11 transcript page 152 and carrying over to line 20 of
12 transcript page 153. Could you please take a minute to
13 read that to yourself.

14 A Okay.

15 Q The transcript doesn't record you as adding
16 anything to Mr. Palmisano's explanation. Would it be
17 correct to assume that you consider his explanation to
18 be accurate?

19 MR. JERMAN: I'll object again on foundation
20 grounds. It doesn't -- this portion of the transcript
21 doesn't identify Ms. Howell.

22 MR. GEESMAN: Your Honor, at page 152 it does
23 identify Ms. Howell. It doesn't identify her as Linda.
24 I did take a leap, the name Linda's on page 3 of that
25 same page.

1 ALJ LAU: Right, I will overrule that
2 objection.

3 THE WITNESS: So Mr. Geesman, I think you were
4 asking me, do I -- when I look at the statement Mr.
5 Palmisano made here on page 153 starting at line 14, is
6 that statement accurate; is that what you were asking
7 me?

8 BY MR. GEESMAN:

9 Q It is. And I believe it starts at line 13.

10 A Starting with "Yeah, the issue." Okay, yes, it
11 does.

12 So it's true that the reporting requirement was
13 difficult to understand. And as Mr. Palmisano indicates
14 here, there was dialogue back and forth with the NRC
15 after, I would mention, the prompt notification on
16 August 6th until the point of the special inspection
17 team being on site, to the point that the
18 misunderstanding was cleared up and Southern California
19 Edison made the formal operation center report. And
20 that's really what Mr. Palmisano is saying here. So
21 he's mentioning there was dialogue with the NRC. The
22 NRC -- he says, "the NRC eventually, when the onsite
23 team was onsite," which is just the way he worded it
24 here, "convinced us we were misinterpreting this and
25 it's legitimate." And so then the report was made. And

1 I'm referring to the formal report to the operations
2 center.

3 Q Let's go to A4NR-X-6.

4 A Okay, I'm there. Thank you.

5 Q It's a two-page excerpt from the transcript of
6 the March 28th Community Engagement Panel meeting in
7 which on pages 164 and 165 Mr. Palmisano explains,
8 quote, "I appreciate the comments and I appreciate the
9 frustration. As I said, we did not take the opportunity
10 to really disclose the event. It wasn't, quite frankly,
11 motivated to hide it. We didn't see it as reportable.
12 We thought we would be delayed a couple weeks, you know,
13 with what we knew at the time. This is before we had
14 done the detailed causal analysis and understood the
15 depth of issues with training and staffing and
16 procedures. There's no excuse. We didn't disclose it,
17 and that's it."

18 Do you agree with Mr. Palmisano's explanation?

19 MR. JERMAN: Objection. Foundation. This
20 document does not identify the comments or the
21 frustration that Mr. Palmisano is purportedly responding
22 to in the highlighted section here.

23 ALJ LAU: I think there were questions. There
24 was a question from Dr. Victor. I would actually
25 overrule the objection.

1 And Mr. Bauder, to the best of your ability,
2 would you agree or disagree with the statements that
3 counsel just read?

4 THE WITNESS: So here, Mr. Palmisano's
5 referring to -- somewhat to the process that occurred
6 not just with the reportability, and I'm talking about
7 the formal report to the NRC that was ultimately made on
8 September 14th, but also a prior Community Engagement
9 Panel meeting where this issue about the fuel, spent
10 fuel canister being hung up, was not immediately laid
11 out in front of the public, and so he was taking the
12 opportunity to express that here in the statement.

13 As to his statements around we thought it would
14 be delayed a couple of weeks, I would say that's true.
15 To the best of his knowledge, when it occurred he --
16 there was not an immediate realization that it would
17 take the length of time it did to be able to come
18 through the issues both with the equipment and with the
19 personnel to safely restart fuel transfer operations.
20 And that's the best I can take from his statement here.

21 And I will tell you that the approach to
22 starting fuel transfer operations was careful, keeping
23 the highest levels of safety in mind. So I think later
24 on Tom realized that. At the time of the meeting he
25 realized that. He was just relaying to a prior instance

1 when this first happened when it didn't immediately sink
2 in to him the amount of effort it would take to be able
3 to safely restart FTO.

4 BY MR. GEESMAN:

5 Q Let's move on to A4NR-X-7.

6 A Okay, I'm there.

7 Q It's a three-page excerpt from the transcript
8 of the March 28th Community Engagement Panel meeting
9 which Mr. Palmisano elaborates, beginning at line 14 of
10 the transcript page 41 carrying over to line 18 of the
11 transcript page 43, some changes Edison made to the
12 Corrective Action Program and the Oversight Program.
13 Could you please take a minute to read that to yourself.

14 A Okay, I've completed. Thank you.

15 Q Would it be correct to assume that you consider
16 Mr. Palmisano's description to be accurate?

17 A What Mr. Palmisano laid out here is accurate
18 insomuch as the improvements that were made. And I will
19 also point out that this is through perfect hindsight
20 and a backward look at the project up until the point of
21 the fuel handling incident. And so, you know, the -- as
22 he mentioned, there was some cases where the crews here
23 had difficulty downloading the canisters. However, they
24 were following procedure. And so before the canister
25 hang-up incident when the crews would encounter this

1 difficulty they would be able to use the procedure,
2 notify the cask loading supervisor, and effectively
3 download the canister in those cases.

4 What Tom's talking about here is, with perfect
5 hindsight we missed an opportunity, you know, after the
6 event and looking backward. And so from that
7 perspective, I agree with it.

8 Q Let's go to A4NR-X-8.

9 A Okay, I'm here. Thank you.

10 Q That's a three-page excerpt from the transcript
11 of the March 28th Community Engagement Panel meeting.
12 And Mr. Morris, the NRC and the Region IV administrator
13 elaborates, beginning at line 19 of transcript page 71
14 and carrying over to line 4 of transcript page 73, on
15 the NRC's thoughts about canister scratching. Could you
16 please take a minute to read that to yourself.

17 A Okay, I've read it. Thank you.

18 Q Transcript doesn't record you or anyone else
19 from Edison disputing Mr. Morris's assessment. Would it
20 be correct to assume that you agree with it?

21 A What portion of it?

22 MR. JERMAN: I'm going to object, before we go
23 further with this document, on foundation that Mr.
24 Morris is not identified as the speaker here.

25 ALJ LAU: That is correct. So I will sustain

1 that objection.

2 BY MR. GEESMAN:

3 Q Let's move on then to A4NR-X-9.

4 A Okay. In front of me. Thank you.

5 Q It's a two-page excerpt from the transcript of
6 the March 28th Community Engagement Panel meeting in
7 which the engagement panel's vice chair, Dan Stetson,
8 and NRC Region IV Administrator Morris, get into an
9 exchange about NRC approval. Beginning on line 19 of
10 transcript page 82, Mr. Stetson says, and I quote,
11 "Scott, I know before Southern California Edison started
12 actually moving fuel they went through a number of dry
13 runs --"

14 And then Mr. Morris interjects, "They did."

15 Mr. Stetson tries to continue on line 23,
16 quoting "that you inspected and approved, and all of
17 these improvements from going from --"

18 And then Mr. Morris interrupts, beginning at
19 line 1 on page 83, and I quote, "Let's just be clear, we
20 didn't approve it, we inspected it to make sure that
21 what they were doing was consistent with their
22 procedures and our requirements."

23 Now, you testify in your rebuttal testimony,
24 which is Edison exhibit 9, page 19 line 10, that Edison
25 had obtained NRC approval prior to moving the fuel. How

1 do you reconcile that statement with what Mr. Morris
2 told the engagement panel?

3 A So there was a detailed inspection performed by
4 the NRC in December of 2017 that involved the NRC
5 observing dry runs by the Holtec team with Edison
6 oversight in place to make sure that all the activities
7 for fuel transfer were being done in accordance with
8 regulations. That was a formal NRC inspection, so that
9 any deficiencies coming out of that inspection would
10 need to be resolved before Edison could start fuel
11 transfer operations, which we did in January of 2018.
12 That's why Mr. Morris here, in my mind, says he's not
13 being picky about the words I'm sorry. What he really
14 means is, no, the NRC did not send us a letter saying
15 it's okay to start FTO now, field transfer operations.
16 What they did is a detailed inspection using their
17 processes in December 2017. As I mentioned, many
18 deficiencies from the inspection would need to be
19 corrected if FTO could have been started in January of
20 2018. I hope that clears it up.

21 Q So you took the lack of an objection by the NRC
22 to be essentially an approval; is that correct?

23 A So the NRC uses fixed processes, sort of a
24 regimented process, for how they do certain things. In
25 this particular case, they used the inspection process

1 to authorize the start of fuel transfer operations. In
2 other cases, they may determine a licensee can or cannot
3 do something, and they'll send a letter called a
4 Confirmatory Action Letter, or an order to specify that
5 the licensee fix certain things before conducting other
6 activities. In this case, they conducted a detailed
7 inspection. That's just what they did. And that's why
8 Mr. Morris here talked about not being picky with the
9 words.

10 Q But they didn't actually give you a formal
11 approval; did they?

12 A They gave us a completed inspection report.

13 Q Let's go on to A4NR-X-10.

14 A Okay, I'm here. Thank you.

15 Q It's a two-page excerpt from a transcript of
16 the March 28th Community Engagement Panel in which
17 first, Ms. Howell, and then Mr. Morris, emphasized
18 beginning at line 24 of transcript page 157 and carrying
19 over to line 10 of transcript page 158, that the NRC
20 considered Edison to be responsible for Holtec's
21 performance.

22 Ms. Howell begins, and I quote, "When it comes
23 to holding Holtec responsible for any of the activities
24 that they're performing at SONGS as a contractor, that
25 is not something that we would reach out to separately.

1 I'll be very clear, Holtec is not the licensee for
2 downloading activities that they are performing under
3 contract with Southern California Edison. Southern
4 California Edison is the licensee."

5 Then Mr. Morris objects, interjects, and I
6 quote, "And as such, are responsible for the activities
7 of their contractors and vendor."

8 I believe you answered a question from Mr.
9 Freedman that was, in essence, agreeing with these
10 statements by Ms. Howell and Mr. Morris; have I got that
11 right?

12 A That's right.

13 Q Let's go to A4NR-X-11.

14 A Okay.

15 Q It's a two-page excerpt from the transcript of
16 the March 28th Community Engagement Panel meeting, which
17 Mr. Palmisano elaborates on the turnover issue,
18 beginning at line 24 of transcript page 162 and carrying
19 over to line 4 of transcript page 163, and he states,
20 and I quote, "So our plan was a 12-month assignment, and
21 we and Holtec did not properly judge there would be some
22 turnover. So these are basically contractors who travel
23 that were here for one or two months and moved onto
24 another job, had to be replaced."

25 Do you agree with Mr. Palmisano's

1 description?

2 A I agree in part with his description here.
3 He's describing the differences between this long
4 duration campaign and potentially a campaign at another
5 nuclear station where it might not be as long, since
6 ours was a campaign to move all of the fuel into dry
7 storage to facilitate decommission. However, I will
8 also say that many of the contractor workers on this job
9 stayed for the duration of the project.

10 Q Let's go to A4NR-X-12.

11 A Okay.

12 Q It's an excerpt from the transcript of the June
13 3rd, 2019, NRC Webinar on SONG fuel loading issues. On
14 transcript page 10, Ms. Howell, now identified as the
15 NRC's Acting Director of the Division of Nuclear
16 Material Safety for Region IV says, and I quote, "During
17 discussions with Region IV managers on August 6th,
18 including myself, Southern California Edison committed
19 to suspend fuel transfer operations until they completed
20 an investigation of the incident, understood the causes,
21 and implemented corrective actions based on their
22 investigation findings. They further committed to
23 continue to suspend fuel transfer operations until NRC
24 completed an independent investigation and was satisfied
25 that Southern California Edison's corrective actions

1 were adequate. Hence, the prolonged suspension of fuel
2 transfer operations at the site."

3 Do you agree with Ms. Howell's description?

4 A Yes.

5 Q Let's go to A4NR-X-13.

6 A Okay.

7 Q It's a two-page excerpt from the transcript of
8 the June 3rd, 2019, NRC Webinar, this time dealing with
9 the resumption of fuel load at SONGS. Ms. Howell
10 describes your notification to Edison beginning at the
11 bottom of transcript page 23, and she describes Edison's
12 response in the middle of transcript page 24. I've
13 highlighted the relevant portions of both pages. Could
14 you please take a minute to read that material to
15 yourself.

16 A Okay, I have. Thank you.

17 Q Do you agree with Ms. Howell's description?

18 A Yes.

19 Q Let's go to A4NR-X-14.

20 A Okay.

21 Q It's a two-page excerpt from the transcript of
22 the June 5th, 2019, meeting of Edison's Community
23 Engagement Panel in which Gerald Strickland, an
24 executive consultant for Holtec, describes changes
25 Holtec made to its training after the August 3rd, 2018,

1 cask loading incident. Could you please take a minute
2 to read to yourself from line 2 on page 57 to line 8 on
3 page 58.

4 A Okay.

5 Q Do you agree with Mr. Strickland about Holtec's
6 need to have, quote, "plenty of bench strength in
7 place," in order to address, quote, "fatigue,
8 complacency, and turnover of staff?"

9 MR. JERMAN: Objection. Foundation. Mr.
10 Strickland is identified as a speaker here, but it does
11 not say who Mr. Strickland is.

12 BY MR. GEESMAN:

13 Q Mr. Bauder, do you know who Mr. Strickland is
14 and what his position with Holtec was?

15 A I know Mr. Strickland. I think he was brought
16 in by Holtec to run this project for a defined period of
17 time.

18 MR. GEESMAN: Your Honor, I think that's
19 adequate foundation.

20 ALJ LAU: Did you work for engagement with Mr.
21 Strickland, Mr. Bauder?

22 THE WITNESS: No, not on a routine basis. I
23 actually do not think Mr. Strickland is a Holtec
24 employee, I think he was brought in by Holtec as a
25 project manager.

1 ALJ LAU: I forgot your question, Mr. Geesman.
2 Could you ask it again.

3 BY MR. GEESMAN:

4 Q Do you agree with Mr. Holtec, or Mr.
5 Strickland, about Holtec's need to have, quote, "plenty
6 of bench strength in place," in order to address, quote,
7 "fatigue, complacency, and turnover of staff?"

8 A I agree, with an additional note on context
9 here. So when we were ready to restart fuel transfer
10 operations, we wanted to make sure that in the act of
11 restarting we had trained appropriate members of crew
12 members, brought in the appropriate people, who some had
13 left during the extended stand down on fuel transfer,
14 and get all those processes in place before we
15 restarted, because it was not my desire to stop and then
16 have to restart again for the simple reason that we
17 didn't have qualified people. And so Mr. Strickland
18 knew this, and that set the basis for the context of his
19 comments.

20 Q Let's take a look at A4NR-X-15.

21 A Okay.

22 Q This is transcript page 75 from the June 5th,
23 2019, Community Engagement Panel meeting lines 10
24 through 18. On that page quote you as saying, quote,
25 "So I can't sit here in front of you, say date, time,

1 certain this is when we're going to plan to handle fuel
2 again. What I can tell you, is we won't handle any fuel
3 until we're totally ready. This involves the checks
4 that I've mentioned, internal SCE management reviews,
5 and my final approval before we start.

6 So we do expect to restart in the coming weeks.
7 We don't know exactly what day or what time. We will be
8 very transparent about that."

9 Does that quote correctly reflect your
10 thinking as of June 5th, 2019?

11 MR. JERMAN: I object to foundation again, in
12 that Mr. Bauder is not identified as the speaker here.

13 BY MR. GEESMAN:

14 Q Mr. Bauder, do you recall making these remarks?

15 A I recall talking to the Community Engagement
16 Panel in June of 2019 about fuel transfer operations
17 restart. I don't remember these exact set of phrases.
18 It's been quite some time. I will tell you this, that
19 even though we had the NRC's concurrence for restart,
20 and the NRC stated that publicly, we needed to do a lot
21 of work to make sure that since we had this extended
22 stand down period that final dry runs, final checks on
23 crew member training, final checks on procedures and, to
24 be honest, presentations that I had to do with my
25 management at Edison before we restarted fuel transfer

1 operations. So that would set the context for these
2 statements. The reason I didn't have an exact time is
3 because we were working through a detailed checklist,
4 and in my mind it was way more important to be accurate,
5 and keep the highest margins of safety in mind, than to
6 give the date, a date to the public, and then not be
7 able to live up to that date.

8 Q When you speak in terms of your management at
9 Edison, who are you thinking of?

10 A When I referenced "my management," what I meant
11 was my boss, the president and CEO of Southern
12 California Edison.

13 Q Now I'd like to take you through some of the
14 minutes and presentation materials from the SONGS
15 Executive Committee in the aftermath of the August 3rd,
16 2018, cask loading incident. Before we do that, can you
17 please describe the membership and function of the SONGS
18 Executive Committee?

19 A The SONGS Executive Committee consists of San
20 Onofre leaders and leaders from San Diego Gas & Electric
21 Company, as well as the cities of Anaheim and Riverside.
22 The purpose of the committee is severalfold. One, in
23 some cases it's, by charter, required to approve
24 expenditures, personnel changes, things like that. The
25 other purpose of the committee is for informational

1 sharing so that the co-owners of the nuclear plant are
2 well aware of activities that they need to be made aware
3 of, as well as the impact that those things could have
4 on their decommissioning funds, as well. So that -- we
5 sometimes call it the co-owners meeting; in effect, this
6 is the executive committee meeting. Same thing.]

7 Q Please turn to A4NR-X-16.

8 A Okay.

9 Q To pay for the minutes of the December 6th,
10 2018 meeting of the SONGS executive committee, the
11 paragraph in the middle of the page describes a
12 presentation by Kerry Rod that provided an overview of
13 the August 3rd, 2018 event and Holtec's root cause
14 evaluation and SCE's apparent cause evaluation, which
15 both recommended various corrective actions prior to
16 resuming fuel transfer.

17 The minutes go on to say that -- and I quote:

18 A subset of the corrective actions required
19 improvements to the employee concerns and
20 training programs. SCE proposed change
21 orders to fund these improvements to
22 support a timely return to fuel transfer
23 activities. The EC committee or EC members
24 unanimously agreed with the concept of
25 improving the employee concerns and

1 training program but did not agree to
2 approve the change orders for these
3 activities.

4 Do you know why the executive committee did not agree to
5 approve the change orders?

6 A I cannot recollect the exact reason here. I
7 think that the executive committee or EC, as we call it,
8 just wanted to have further discussions before approval.

9 Q Please turn to A4NR-X-17.

10 A Okay.

11 Q It's a PowerPoint presentation that Kerry Rod
12 made to the executive committee on December 6th, 2018.
13 That's a little more than four months after the August
14 3rd event, right? Please turn to the third page of the
15 exhibit --

16 A Right.

17 Q -- which has the No. 12 in its lower right-hand
18 corner. It's the page with the title, quote, "Request
19 ECP Coordinator."

20 A I need to make sure I'm in the right set of
21 documents here. I'm sorry. It's A4NR --

22 ALJ LAU: Let's go off the record.

23 (Off the record.)

24 ALJ LAU: Let's go back on the record.

25 ///

1 BY MR. GEESMAN:

2 Q Mr. Bauder, if we could move to A4NR-X-18.

3 A Okay.

4 Q It's a two-page excerpt from another PowerPoint
5 presentation that Kerry Rod made to the December 6th,
6 2018 meeting of the executive committee. This one is
7 entitled Status of Resuming FTO. FTO is an acronym for
8 fuel transfer operations, right?

9 A That's right.

10 Q Please turn to the last page in the exhibit,
11 the one with the No. 29 in its lower right-hand corner
12 that is entitled Restart Timeline.

13 A I'm there. Thank you.

14 Q That page shows that as of December 6, 2018
15 Edison was projecting a restart sometime between January
16 15th and January 20th, 2019, correct?

17 A That's right.

18 Q I'm going to skip over A4NR-X-19C because we'll
19 deal with that in the confidential sessions, but if we
20 could go to A4NR-X-20, I would appreciate it.

21 A Okay. I'm there.

22 Q It's an excerpt from a PowerPoint presentation
23 that Jim Peattie made to the January 10th, 2019 meeting
24 of the executive committee. The last page of that
25 exhibit, which has the No. 29 in its lower right-hand

1 corner, is entitled Restart Timeline. The timeline
2 includes an entry "Feb 25, 2019, SCE CNO approval," does
3 it not?

4 A Yes.

5 Q And "CNO" means chief nuclear officer, who
6 would be you, correct?

7 A That's right.

8 Q The timeline also projects for the very next
9 day "Feb 26, 2019, Holtec resumes FTO," correct?

10 A Yes.

11 Q Let's go to A4NR-X-21.

12 A Before we do that, if your Honor -- just have a
13 quick comment to make here. These timelines were at the
14 time put together based on best estimates of FTO
15 restart, and we just had a lot of work to do to get
16 ready and make the equipment improvements that we did.
17 And so even though it says, "CNO approval," I never
18 approved, obviously, until all those improvements were
19 in place and I had confidence we could perform fuel
20 transfer without -- with continuity without any further
21 incidents.

22 Q Understood.

23 ALJ LAU: Thank you, Mr. Bauder.

24 BY MR. GEESMAN:

25 Q Let's go to A4NR-X-21.

1 A Okay.

2 Q That's an excerpt from a PowerPoint
3 presentation that Jim Peattie made to the February 7th,
4 2019 meeting of the executive committee. The second
5 page of that exhibit, which has the No. 14 in its lower
6 right-hand corner, is entitled Restart Timeline. The
7 timeline includes an entry "Feb 22, 2019, SCE approval"
8 with an asterisk indicating the date was not confirmed
9 due to a potential CEP meeting.

10 Have I got that right?

11 A That's right. The desire that we had was to,
12 you know -- if we were able to work through all
13 activities that would garner approval of fuel transfer
14 was to get in front of the CEP and make sure the public
15 was well-aware of our intention to restart fuel
16 transfer. So that's the purpose for the footnote.
17 Additionally to that is the purpose for the annotated
18 item in the (inaudible) chart that says "public
19 outreach." There was a lot of work to do here with our
20 stakeholders to make sure that they understood our
21 rationale and that we were ready to resume. And that
22 did not change up through NRC approval in mid-May of
23 2019 and the NRC public meeting Webinar on June 5th of
24 2019 and, further, our CEP meeting in June of 2019. So
25 you'll see these repetitive activities, and they are

1 adjusted in dates as we continued to work on everything
2 we needed to do to make sure fuel transfer would be safe
3 and compliant.

4 Q Had the meaning of SCE approval changed to
5 something different than CNO approval?

6 A Yes. At that time, I -- in discussions, as I
7 indicated in prior testimony, with my boss, the
8 president and CEO of the company, he wanted to provide
9 the approval authority, and he ultimately did.

10 Q The timeline projects "resume FTO" again with
11 an asterisk sometime shortly after March 3rd, correct?

12 A Yes. I'm looking at it now.

13 Q I'm going to skip over A4NR-X-22C. We'll take
14 that up in the confidential session. So if you would
15 turn to A4NR-X-23, I would appreciate it.

16 A Okay. I'm there.

17 Q It's a two-page excerpt from the minutes of the
18 March 7th, 2019 SONGS executive committee. On the first
19 page of the exhibit, I've highlighted in green an
20 indication that Edison was forecasting a resumption of
21 FTO, quote, "within a few days," close quote, of the
22 March 25th, 2019 NRC Webinar.

23 Do you see that?

24 A Yes. It's highlighted in green here in the
25 center of page 3.

1 Q And then go on to the second page of the
2 exhibit. There's an indication that I've highlighted
3 that the committee went into executive session to
4 discuss, quote, "assessment of SCE oversight performance
5 and forecast for issuing an RFP for an external
6 consultant to further evaluate SONGS oversight
7 performance."

8 Q Can you tell me what that's all about?

9 A Well, it was our desire to make sure that we --
10 and confirm that we had a solid oversight process not
11 just for fuel transfer operations but for other
12 decommissioning activities. So we solicited the
13 committee for approval to issue a request for a proposal
14 to do just that.

15 Q Is it correct that San Diego Gas & Electric had
16 been raising that concern for some time?

17 A I would have to look back at prior meeting
18 minutes, but I believe San Diego Gas & Electric did
19 bring up this topic in several meetings, and we put
20 together the action plan to put in place.

21 Q Let's go to A4NR-X-24.

22 A Okay.

23 Q That's a two-page excerpt from a PowerPoint
24 presentation that Vince Bilovsky made to the March 7th,
25 2019 meeting of the SONGS executive committee. The

1 second page of that exhibit, which has the No. 23 in its
2 lower right-hand corner, it's entitled Restart Timeline.
3 The timeline includes an entry for SCE senior management
4 approval taking place at some unspecified period of time
5 at the March 28, 2019 CEP meeting; is that correct?

6 A That's right.

7 Q Who exactly was the SCE senior management that
8 was going to be asked for approvals? Are we still
9 talking about the president of Southern California
10 Edison?

11 A That's right.

12 Q In the entry "resume FTO," there's an asterisk
13 indicating that the date for FTO restart had not been
14 finalized, doesn't it?

15 A That's right. And there's a really good reason
16 for this and a rationale in that at this point in time,
17 as we discussed prior in our testimony, we were working
18 through an issue identified with the canisters
19 themselves, and that issue happened to be did incidental
20 contact of the canisters in the cavity enclosure
21 containers either with a shield ring or other components
22 of the container, did that incidental contact result in
23 any challenge to the integrity of those containers. And
24 so you would have seen that in prior -- come out in the
25 NCR public Webinar in March of 2019 where the NRC

1 mentions it as not a safety issue but a deterministic
2 issue to work through, and we were doing just that.

3 We started out by evaluating the process
4 through calculations and then later committed to do
5 physical canister inspections to confirm to us and to
6 the NRC that canister integrity was preserved and this
7 incidental contact with the closure containers would not
8 result in any safety challenge. That took time. And
9 that's why you see over the course of time here fuel
10 transfer operations being pushed out. And we ultimately
11 worked through that process. We inspected eight
12 canisters. Since then, we've additionally inspected two
13 more, and those inspections reveal that there is no
14 challenge to canister integrity. And the NRC approved
15 the process that we used to do them as well.

16 Q Let's go to A4NR-X-25.

17 A Okay.

18 Q That's two pages from the minutes of the April
19 4th, 2019 meeting of the executive committee, and the
20 first page of the exhibit I've highlighted in green an
21 indication that, quote:

22 Vince Bilovsky reviewed the status of the
23 key recovery milestones to resume fuel
24 transfer activities noting that the NRC
25 continues to review the wear mark analysis

1 and will not allow SCE to resume FTO until
2 they are satisfied. Close quote.

3 Do you see that?

4 A I do.

5 Q And then --

6 A Actually --

7 Q -- on the second page of the exhibit, there's
8 an item I've highlighted indicating that a topic
9 discussed in the executive session was assessment of SCE
10 oversight performance of forecast for issuing an RFP for
11 an external consultant to further evaluate SONGS
12 oversight performance.

13 This related back to that San Diego Gas &
14 Electric comment from the earlier minutes, did it not?

15 A I believe it does, but first, to address the
16 highlighted portion on the bottom of page 2, this is a
17 brief summary of what I was just talking about moments
18 ago with respect to the wear mark analysis. This had to
19 do with canister incidental contact in the cavity
20 enclosures and the data that we took through robotic
21 inspections and went through a statistical analysis and
22 presented that to the NRC. The NRC was still in the
23 process of reviewing that data at the time that this
24 meeting was conducted.

25 Q With respect to that second highlighted item

1 about the external consultant for evaluating the
2 oversight performance, can you explain why that
3 discussion needed to be done in executive session?

4 A I don't think there's any particular reason
5 other than we wanted to discuss it in executive session.

6 Q Let's go to A4NR-X-26.

7 A Okay.

8 Q It's a PowerPoint presentation of Vince
9 Bilovsky made to the April 4th, 2019 meeting of the
10 executive committee entitled Status of Resuming FTO.
11 Third page of the exhibit, which has the No. 20 in its
12 lower right-hand corner, identifies several dates as
13 TBD. I presume that means "to be determined." One of
14 those is for a presentation to the INMG.

15 Can you tell me what is the INMG?

16 A The INMG stands for Internal Nuclear Management
17 Group. It's an entity in -- which commingles Edison
18 International Company with Southern California Edison
19 for the purpose of informing the group as to what is
20 going on at the San Onofre nuclear generation station.
21 The INMG process or meeting cadence was set up long
22 before decommissioning activities ever started. Think
23 about it as a way for the president and chief executive
24 officer of Edison International and the Edison
25 International Management Committee to know about SONGS.

1 The Southern California Edison structure falls
2 underneath essentially the INMG.

3 Q Understood. Another of the to-be-determined
4 dates on A4NR-X-26 is for -- and I'm quoting -- "SCE
5 approval for single-unit operations." Close quote. Had
6 Edison always expected that the FTO restart would be
7 limited to one unit at a time?

8 A No. But when we did restart, our intention was
9 to start in single-unit operations only and then, after
10 a brief assessment of performance with proper approvals,
11 move back to two-unit operations. When I say
12 "two-unit," I mean loading operations from both of the
13 Unit 2 and Unit 3 spent fuel pools.

14 Q So when did you make the determination that it
15 would be best to start up one unit at a time?

16 A Well, simply as part of the restart process, we
17 wanted to make sure we had -- because we hadn't handled
18 fuel canisters or done the loading and drying operations
19 for quite some time, we wanted to make sure that we
20 started on a cadence that the crews would be comfortable
21 with. And so -- and I don't remember whose idea it was
22 that -- I don't think it was mine. But the idea was to
23 start on a slower cadence so we would have an
24 opportunity to really do a careful assessment on those
25 operations and make sure we were ready before we went to

1 two-unit operations.

2 Q But you had indicated just now that that hadn't
3 been your original plan; is that correct?

4 A No. I don't know what you mean by "original
5 plan."

6 Q When you had originally started thinking of the
7 restart scenario or implementation, you had not planned
8 to restart one unit at a time, if I understood you
9 correctly before?

10 A I don't believe I made an assertion before as
11 to whether we would start at one unit at a time or not.
12 It just simply became part of our thinking as we worked
13 towards fuel transfer operations restart, that it would
14 be more appropriate to start with one-unit operation at
15 a time to start at a little slower cadence so that the
16 crews could become familiar with the equipment again,
17 have a chance to exercise the procedures and training.

18 Q Thank you for the clarification. On the fourth
19 page of the exhibit, the one with the No. 21 in its
20 lower right-hand corner, under the heading NRC Webinar
21 and then CEP Comments, there's a line that says, "NRC
22 made public statement that SONGS cannot restart FTO
23 yet."

24 Had Edison heard that from the NRC before the
25 public Webinar and CEP meeting?

1 A I'm trying to get my dates lined up here. So
2 the Webinar was completed on the 25th of March. And at
3 that time, we had knowledge that the NRC had concerns
4 and wanted resolution on the canister incidental
5 contact, or you'll hear it called the canister
6 scratching issue, and we knew -- I knew that the NRC
7 would not allow restart until we were able to work
8 through that issue successfully satisfying not just
9 ourselves but also the NRC. And so that is the genesis
10 of the NRC making those public statements. And I'll
11 further characterize to say that the NRC was clear to
12 say it wasn't a safety issue. It had to do with a
13 process issue and how we handled a change to the
14 license -- or how we assessed a license and limitation
15 of the Holtec system at San Onofre.

16 Q Let's go to A4NR-X-27.

17 ALJ LAU: Mr. Geesman, I'm going to interject.
18 How many more minutes of questions do you think you have
19 minus the confidential questions -- questions regarding
20 confidential data?

21 MR. GEESMAN: I think I've probably got 45
22 minutes of public questions left.

23 ALJ LAU: Why don't we take a five-minute
24 break, and then can we interrupt the flow and just go --
25 I think I would rather finish the confidential session

1 today, since everyone's here. I think at 4:45 we should
2 just go into confidential session.

3 MR. GEESMAN: That would be fine, your Honor.

4 ALJ LAU: So let's take -- it's 4:18. I think
5 our reporters will need a break -- or my management tell
6 me that my reporters need a break. So let's resume at
7 4:30. Thank you.

8 And we're off the record.

9 (Off the record.)

10 ALJ LAU: Let's go back on record. We decided
11 during recess that we will just enter into confidential
12 session, a closed session, to discuss confidential data.
13 In the session would be myself, Allen Trial, Ryan
14 Jerman, Doug Bauder, Charles Langley, Nina -- I'm
15 sorry -- Babiarz. And it's not Nina. It's -- I don't
16 know. I'm sorry -- and John Geesman, Matt Freedman,
17 Wayne Parker, also Monica Weaver and Stacy Hunter. And
18 so our IT staff will not -- will now put us into
19 confidential session mode.

20 MR. JERMAN: And your Honor, we would also like
21 to include Katie Chollet-Guibert from SCE in the
22 confidential session.

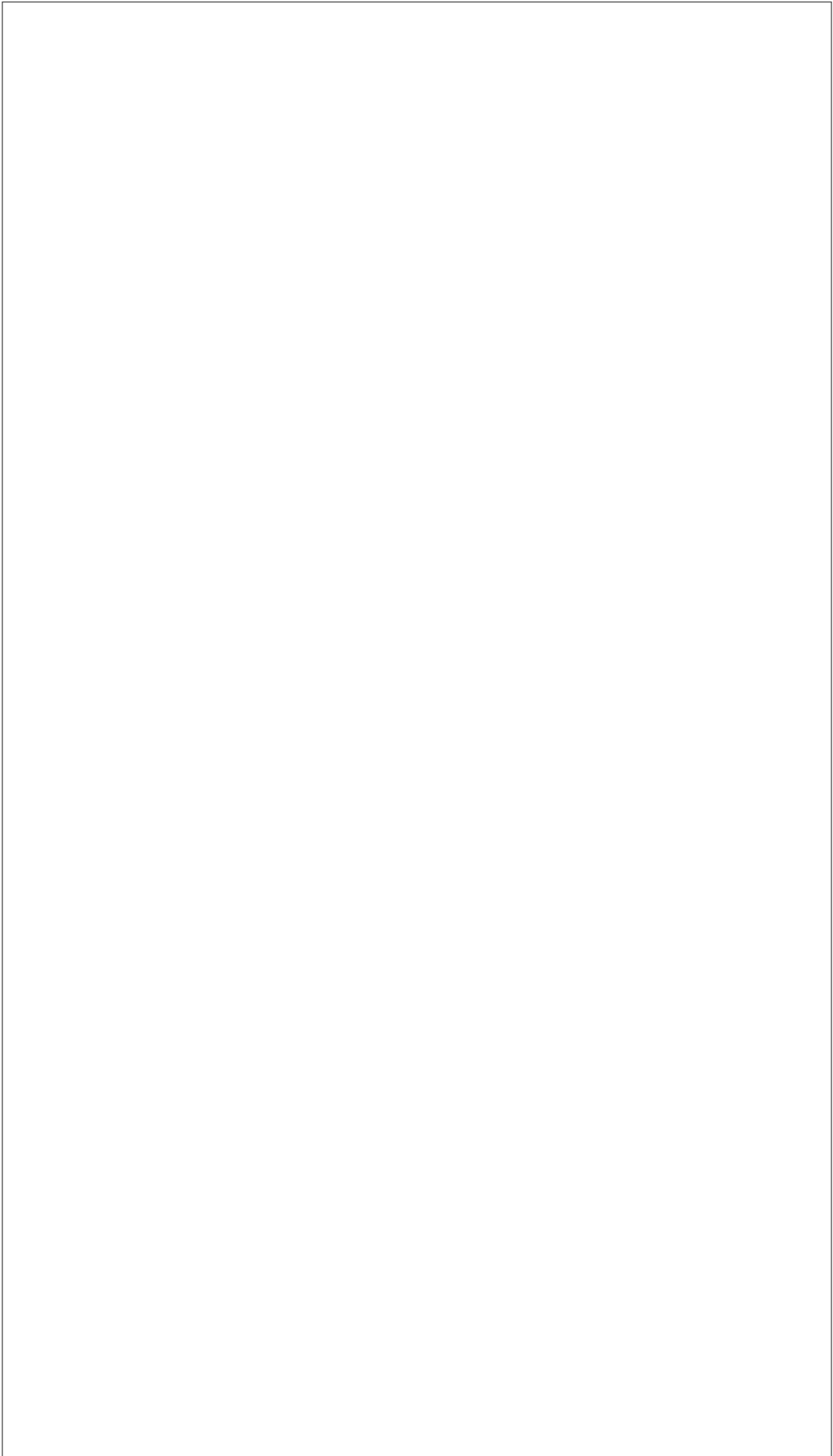
23 ALJ LAU: Let's go off the record.

24 (Off the record.)

25 ALJ LAU: So let's go back on the record.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

(End sealed material.)

MR. WILLMAN: We are back on the main session.

1 ALJ LAU: We just concluded our confidential
2 closed session. Now we are -- we are back in the public
3 session.

4 As far as today, we are going to conclude --
5 going to conclude in a few minutes. I just want to
6 remind Mr. Bauder that he is to resume on the witness
7 stand tomorrow morning at 10:00 a.m., and with Mr.
8 Geesman resuming his line of questions.

9 Are there any matters from the parties that
10 they want to discuss before we adjourn?

11 (No response.)

12 ALJ LAU: If not, let's adjourn for today.

13 Thank you. Off the record.

14 (At the hour of 4:41 p.m., this matter having
15 been continued to 10:00 a.m., January 25,
16 2023, the Commission then adjourned.)

17

18 * * * * *]

19

20

21

22

23

24

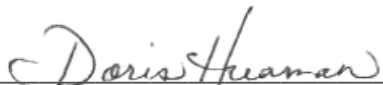
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, DORIS HUAMAN, CERTIFIED SHORTHAND REPORTER
NO. 10358, 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 JANUARY 24, 2023.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS JANUARY 31, 2023.



DORIS HUAMAN
CSR NO. 10538

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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 JANUARY 24, 2023.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS JANUARY 31, 2023.




KARLY POWERS
CSR NO. #13991

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, TAMARA DAWSON, CERTIFIED SHORTHAND REPORTER
NO. 11497, 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 JANUARY 24, 2023.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS JANUARY 31, 2023.


TAMARA DAWSON
CSR NO. 11497

<hr/>	10:06 51:2	17th 171:9	2018 60:12,14,19 61:1,5,12,16,21 65:21 66:2 67:3 74:19 75:3,8 90:21,22 92:8 93:6,24 97:14 99:13 101:3,10 108:1 110:4 112:11,13,21 117:25 168:23 169:6 170:20 179:16,20 180:8 181:1 191:11,20 195:25 199:16 200:10,13 201:12 202:6,14
<hr/> \$ <hr/>	10th 75:25 76:3 202:23	18 68:3 80:2 95:21 96:2 107:9,14 125:24 126:2,3 184:10 188:10 197:24	2019 71:10,15,21 72:1,6,11,16,21,25 73:5,16,20 74:1,6,10 75:20 76:1,3,11,17,21 77:1,6,16,18,23 78:4,9,14,22 79:2,7,12,18,22 97:11,17,25 168:24 170:7,18,25 171:9 181:15 182:6 183:2 184:6 194:13 195:8,22 197:23 198:10,16 202:16,23 203:2,9 204:4,7,23,24 205:18,22 206:25 207:5,25 208:19 210:9
\$1 177:11	11 69:6,8 142:15,17	18th 101:9	2020 60:13,14,19 61:1,6,12,16,22 62:11,12 65:22 66:3,7,11 67:3 80:12 167:19 172:8
\$105 128:3	11-month 98:2	19 70:4 81:11 91:25 93:10 122:22 123:2,3 167:16 171:12,22,25 172:4 189:13 190:9,24	2021 51:9 59:24 60:4,8,12,14,19 61:1,5,21 62:1,6,17,22 63:1,2,9,13,18,23 64:4,15,20 65:5 80:2,21 81:11,15 90:25
\$112 128:12	11:10 86:12	19-C 82:21	2022 59:18 81:20,25
\$115,000 172:10	11:25 86:13	1982 121:21 122:9	2023 51:2
\$116,000 102:12	11th 78:14 146:18	1998 121:25 127:9,18 128:7 131:6	2024 173:20
\$124 128:13	12 69:6 113:2 114:16,19 137:17,18 138:3 139:20,22,24 201:17	19th 101:9	2027 173:19
\$168 128:23 158:3	12-month 193:20	19th 101:9	2051 130:23 131:19 132:2
\$22 131:22	12:30 51:19	19th 101:9	20th 202:16
\$3-billion 177:13	12:40 133:21,24 134:21	19th 101:9	21 138:5,7 212:19
\$33 128:4,14	12:42 134:23	19th 101:9	22 125:24 126:2 204:7
\$34 128:5,15	12th 167:19	19th 101:9	22-02-016 51:7
\$4.7 177:9	13 68:15 185:9	19th 101:9	22-C 82:21
\$55 130:23	14 69:7 90:7 91:25 93:10 147:4 155:4 159:2,23 185:5 188:9 204:5	19th 101:9	22nd 79:7 107:6
\$92 128:2	14th 99:2,10,13,23 187:8	19th 101:9	23 69:5 70:14 73:25
<hr/> (<hr/>	15 70:14 105:4,6 109:11 153:19 159:23	19th 101:9	
<hr/> (73) 92:8 <hr/>	15-minute 51:19,20 86:9,10,11 166:21	19th 101:9	
<hr/> 0 <hr/>	152 72:5 184:11,22	19th 101:9	
002 162:2	153 72:5 184:12 185:5	19th 101:9	
02-08-064 106:12,16,22 107:1	157 73:5 192:18	19th 101:9	
<hr/> 1 <hr/>	158 73:5 192:19	19th 101:9	
1 59:17 60:12,14 62:1,6,12,17 65:20 66:1,7,11 67:1,4 68:19 69:5 71:20,25 72:5,10,15,20,25 73:5,15,20,25 74:5,10 78:22 89:2 109:24 120:24 128:2,12 129:12 130:2 142:3 156:13,14,18,20 157:16 173:17 190:19	15th 97:11,16 202:16	19th 101:9	
10 69:1 73:20 75:20 129:4,5,6 134:8 144:23 190:24 192:19 194:14 197:23	16 70:14	19th 101:9	
10:00 51:18	16-12-063 104:23,25 106:2	19th 101:9	
	162 73:15 193:18	19th 101:9	
	163 73:15 193:19	19th 101:9	
	164 72:10 186:7	19th 101:9	
	165 72:10 186:7	19th 101:9	
	17 68:24 70:14 105:6 113:6,13,15 155:4	19th 101:9	
		2 61:1,5,11,16,21 62:1,6,12,18 65:20 66:1,7,11 67:1,4 68:3,7,11,15,25 69:6,13,17,22 70:4,9,13 74:18 75:19 77:6,15,23 78:14 79:12 90:16 98:2 104:1,22 109:14,16 110:1 128:3,13 129:12 130:2 142:16 143:10 145:13 155:9,13 157:16 161:4,24 177:6 196:2 209:16 211:13	
		2-3 60:19	
		2-4 95:11	
		20 68:24 70:5 109:11 134:8 147:9 184:11 210:11	
		2002 107:5,7	
		2009 90:6,14,15 155:23 168:19	
		2010 90:17	
		2013 90:18	
		2016 127:9,19 128:7 131:6,12 181:7	
		2017 69:13,24 128:18 158:4 191:4,17	

122:22 123:2 190:15 195:11 207:1	3rd 73:20,25 79:22 92:8 93:6 97:14 102:23 108:1 110:4 112:11,13 117:25 194:13 195:8,25 199:15 200:13 201:14 205:11	<hr/> 6 <hr/>	<hr/> A <hr/>
23rd 59:18		6 68:7 74:19,23 75:3,7 124:8 125:20 126:19 145:14 157:23 168:3,5 202:14	A-B 162:3 A-E 58:24 A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
24 51:2 71:10 73:25 155:2 192:18 193:18 195:12		6-C 135:23	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
25 68:20 71:15 81:15 113:14 203:2	<hr/> 4 <hr/>	6th 78:9 81:25 98:20 101:5 185:16 194:17 200:9 201:12 202:5	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
25th 205:22 213:2	4 70:9 76:21 77:6,15 79:2 91:10,18,21,25 93:10 94:8 98:20 102:6 128:5,15 156:14,15 164:13 189:14 193:19	<hr/> 7 <hr/>	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
26 203:9		7 68:11 88:12 89:2 104:1 109:15 142:2 143:9,10 168:3,5 170:17 182:16	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
27 70:14 80:21		7-C 135:23	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
28 81:20 207:5	41 72:15 188:10	71 72:20 189:13	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
28th 71:21,25 72:6,11, 16,21,25 73:5,16 181:15 182:6 183:2 184:2,6 186:6 188:8 189:11 190:6 192:16 193:16	42 81:6 42-C 82:21 43 72:15 81:6 188:11 43-C 82:21	72 100:2,14	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
29 97:2 202:11,25	44 81:6 44-C 82:21	73 72:20 96:13 189:14	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
29th 92:8	45 71:20 81:7 94:22 182:1,16 213:21	75 74:10 197:22	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
2:55 166:22	45-C 82:21	7th 76:11,16,21 77:1 204:3 205:18 206:24	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
2nd 61:5 77:23 78:4	47 71:20 182:2	<hr/> 8 <hr/>	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
<hr/> 3 <hr/>	4th 77:6,16,18 208:19 210:9	8 70:14 81:10 95:10 96:8,19 106:7 109:12 136:12 144:1 196:2	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
3 61:1,5,11,16,21 62:1, 6,12,18 65:20 66:1,7,11 67:1,4 69:13,18,22 71:20 75:19 76:21 77:23 79:2,22 88:12 89:2 90:16 92:18 97:22 98:3 104:1 121:6 122:19 128:4,14 129:12 130:2 138:3,4 155:12 157:16 183:4 184:24 205:25 211:13	<hr/> 5 <hr/>	82 72:25 190:10 83 72:25 190:19 85 71:25 183:1 8th 79:2 146:18	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
3-1 131:8 158:1	5 59:18 68:3 69:8 121:6 124:6,8 125:23,24 128:17,21 144:2 158:2 5-C 135:23 5-page 181:14	<hr/> 9 <hr/>	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
30 156:3 157:4	50 144:17,23	9 68:3 88:12 89:2 104:5, 9 106:8 107:9 109:11 161:24 190:24	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
30th 110:10	55 94:23	9.a 162:8 9.a-b 162:2	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
31 70:14 158:25 159:23	57 74:6 196:2	98 131:11	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
32 161:3	58 74:6 196:3	9th 80:12	A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
3285-E 69:12	583 84:24		A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
33 70:14 164:11	5:00 51:21		A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18
3535-E 69:12	5th 74:6,10 79:12,17 195:22 197:22 198:10 204:23		A.18-03-009. 68:25 69:8 A.21-12-007. 70:19 A.22-02-016. 69:1 a.m. 51:2,18

A4nr-x-22c 76:15,18 205:13	A4nr-x-9 72:24 73:2 190:3	180:10 191:6 192:6,23 193:2,6 200:2,23 201:3 204:13,25 206:12 208:24 210:22	Advocacy 168:3
A4nr-x-23 76:20,23 205:15	abbreviated 124:25	activity 178:18	Advocates 56:17,20, 21 84:16,23 85:5 89:9, 12,14 113:19 114:6 120:14 133:19,25 135:6
A4nr-x-24 76:25 77:3 206:21	ability 164:4 187:1	actual 99:4 112:20	Advocates' 84:22 85:9 113:25 114:12
A4nr-x-25 77:5,8,15 208:16	aboveground 172:4 176:1	add 83:22 120:24 152:17	AE 63:12,15
A4nr-x-26 77:17,20 210:6 211:4	Absolutely 139:9	addendum 171:8,10	affect 133:3
A4nr-x-27 77:22 78:1 213:16	abundance 110:7	adding 182:9 184:15	affiliation 183:18
A4nr-x-28 78:3,6	accept 171:11	additional 82:13 112:10,14 113:21,24 115:1 130:8 147:17 148:23 149:7,10,14 150:17 197:8	aftermath 199:15
A4nr-x-29 78:8,11	acceptable 103:1	address 84:14 85:17 162:5 196:7 197:6 209:15	afternoon 51:21 135:1 136:9,10 167:6 179:10, 11
A4nr-x-3 71:19,22 181:14	accepted 175:2	additionally 204:17 208:12	Agent 139:24,25 140:1, 3,7,10,11,14,17,24 142:6,14 143:18 144:9 146:7 154:10
A4nr-x-30 78:13,16	accident 147:18,21 148:1	address 84:14 85:17 162:5 196:7 197:6 209:15	aging 173:7,18
A4nr-x-31 78:21,24	accordance 191:7	addresses 143:10 152:13	agree 53:18 55:23,25 56:15 57:2,10,18 58:2 87:23 115:2 136:20,23 146:2 151:14 154:15 172:23 177:18 182:18 186:18 187:2 189:7,20 193:25 194:2 195:3,17 196:5 197:4,8 201:1,4
A4nr-x-32 79:1,4	account 124:13,15,20, 25 126:8,9,14 129:22 133:11 163:6,12	addressed 141:9 154:13 173:14,16	agreed 53:20 85:23 135:8 148:15 171:11 172:1 200:24
A4nr-x-33 79:6,9	Accounting 66:16,21	addressing 157:20	agreeing 86:25 193:9
A4nr-x-34 79:11,14	accurate 88:20 182:12 184:18 185:6 188:16,17 199:4	adequate 195:1 196:19	agreement 70:19 147:10 148:9
A4nr-x-35 79:16,19	acronym 56:13 65:10 202:7	adhere 51:24	ahead 75:14 84:17 124:1 159:19
A4nr-x-36 79:21,24	act 107:15 114:4 121:21 122:4,7,8,12 139:11 158:23 197:10	adjusted 205:1	aid 91:3
A4nr-x-37 80:1,4	acted 108:1,2 139:7 154:19	adjustment 97:12	alignment 112:15
A4nr-x-38 80:6,9	Acting 194:15	administering 174:7	ALJ 54:9,14,16 55:16, 19,22 56:1,6,9,16,22 57:2,5,12,18,21,24 58:4,9,13,20 59:3,7,12, 16,21 60:3,7,11,18,23 61:4,9,15,20,25 62:5, 10,16,21,25 63:5,12,17, 22 64:3,8,12,19,24 65:4,9,13,19,25 66:6, 10,14,19,24 67:7,11,16,
A4nr-x-39 80:11,14	action 105:9 137:6 146:12 154:19,24 156:10 188:12 192:4 206:20	administrative 51:4, 11 100:24	
A4nr-x-4 71:24 72:2 182:24	actionable 146:13	administrator 181:23 183:3,24 189:12 190:8	
A4nr-x-40 80:20,22	actions 94:2 102:24 104:12 107:21 108:5 114:10 115:12 136:20 138:24 146:11,22 148:3,5,15 194:21,25 200:15,18	admission 85:24	
A4nr-x-41 80:24 81:1	activities 65:21 66:2 67:2 114:5 130:17 132:9,10,15 137:1 140:13 142:3 143:12,20 160:11,12 162:14,19	admitted 109:2 114:24	
A4nr-x-42-c 81:10,12		adopt 89:1 163:16	
A4nr-x-43-c 81:14,17		Adoption 70:18	
A4nr-x-44-c 81:19,22		advice 69:12 140:5 162:23 163:2	
A4nr-x-45-c 81:24 82:2		advisor 51:15 139:25 140:1,3,7	
A4nr-x-5 72:4,7 184:5		Advisory 146:7	
A4nr-x-6 72:9,12 186:3			
A4nr-x-7 72:14,17 188:5			
A4nr-x-8 72:19,22 189:8			

21 68:1,6,10,14,18,23 69:4,11,16,21 70:3,8, 12,17,22 71:4,9,14,19, 24 72:4,9,14,19,24 73:4,9,12,19,24 74:4,9, 14,16,22,25 75:6,11,14, 17,23 76:6,9,15,20,25 77:5,10,13,22 78:3,8, 13,18,20 79:1,6,11,16, 21 80:1,6,11,16,18,24 81:4,8,14,19,24 82:4, 16,24 83:12,19,24 84:9, 17 85:6,12,16 86:2,7,15 87:6,18,23 88:1 89:8 91:15,17 105:14,21 108:8 109:21 120:9,11 123:16,23 124:3 127:13,15 133:21 134:15,18 135:4,20 136:6 137:24 138:1 141:19,21 143:5 145:8, 10,17 152:23 156:4,16, 22 157:2 159:9,15,19 166:14,18,25 168:10 171:20 172:23,25 173:23 174:10,20 175:4,8,13,21 176:2,10, 12,24 177:18 178:20,25 179:3,7 182:18,22 183:19 185:1 186:23 189:25 196:20 197:1 201:22,24 203:23 213:17,23	analyst 52:25 83:4 analyze 114:6 and/or 156:25 Anne 55:14 annotated 204:17 announce 75:16 133:22 answering 108:20 175:11 answers 103:11 anticipated 94:24 129:16 131:12 anticipation 145:19 apologize 86:8 133:22 159:18 apparent 93:21 200:14 appearance 52:1 appearing 55:12,15 appears 52:4 152:22 appendix 64:12,15,17 89:21,22 144:18,23 applicable 126:17 application 51:6,7 106:23 170:10,15,21,23 171:4 applied 136:17 applies 104:12 apply 137:11 approach 98:14 183:9 187:21 appropriately 154:20 approval 91:7 103:18 126:10 159:2,24 190:9, 25 191:22 192:11 198:5 201:8 203:2,17 204:7, 13,22 205:4,5,9 206:13 207:4 211:5 approvals 207:8 211:10 approve 170:22 190:20 199:23 201:2,5 approved 91:21 124:14,22 126:12	167:10 171:11,17 175:24 178:6 190:16 203:18 208:14 approves 103:12 approving 181:3,9 approximately 90:6,7, 18 95:21 April 77:6,16,18 80:12 81:25 208:18 210:9 area 147:5 152:1 argumentative 152:18 articulated 114:21 aspect 116:3 aspects 97:18,20 141:8 assemblies 95:3 assert 130:1 assertion 212:10 asserts 114:11 assessed 213:14 assessment 146:23 189:19 206:4 209:9 211:10,24 assigned 51:13 140:25 assignment 193:20 assisted 91:6 assume 162:5 182:11 184:17 188:15 189:20 assuming 133:4 170:19 171:7 assumptions 63:2,9, 14,19 132:4,7,24 assurance 144:7,13,19 assure 142:12 161:5 asterisk 204:8 205:11 207:12 attached 56:25 145:22 Attachments 58:24 67:17,22 68:20 69:7,18 attempting 167:24 attendance 51:14,15 54:23	attended 108:24 attention 139:21 attest 52:2 56:4 86:25 attestation 55:17 56:5, 7,14 57:17 attestations 52:6 54:24 55:5,7,9,20,23 56:23 57:3,10,18 58:2, 10 86:19 87:1,20,24 attested 88:7 attorney 55:5,8,14 56:4,14,19 57:8,9 58:2 89:12 109:2 attorneys 51:25 52:2 54:24 84:22 113:12 August 79:2 81:11,15 92:8 93:6 97:14 98:20 101:3,5 102:22 107:6 108:1 110:3 112:11,13 117:25 185:16 194:17 195:25 199:15 200:13 201:13 authority 205:9 authorization 162:22 authorizations 143:16 authorize 192:1 authorized 127:18 avoided 112:14 113:20,24 115:1 avoiding 159:4 awaited 149:1 awarded 128:25 awards 125:15 aware 84:8 97:15 102:15,18,20 117:16, 18,23 130:21 145:22 200:2
<hr/> B <hr/>			
Babiarz 57:22,23,25 59:9,13 167:2,4,5,7,24 168:1,10,12,13,15 171:16,24 172:24 173:1,3,13,22 174:1,16,			

23,25 175:6,10,18,23 176:8,14,21	198:12,14 202:2 203:23	bring 206:19	canister 92:3,9,12,16, 17,19,23,25 93:13 94:20,21 95:2,8,12,17, 19,22,23,24 96:2,5,22 97:1,3,6,22 98:6 100:15 101:14,22 102:25 103:3,5,9,24 107:25 108:3 110:2,10,12,14 111:11,13 115:9 118:3, 9,21,25 119:12,16,18 138:14,20 139:13,18 142:9 147:21,22 150:14 156:21 187:10 188:24 189:3,15 208:5,6,14 209:19 213:4,5
back 58:20 71:4 73:12 74:16 77:13 78:20 80:18 86:12,13 90:22 93:23 96:19 105:24 109:12 120:11 127:15 132:13 133:8 135:4,5 138:1 141:21 143:8 145:10 147:3 153:18 155:1 158:24 160:9 164:10 166:2,18,25 171:3 176:12 178:8 180:7 185:14 201:24 206:17 209:13 211:11	Bauder's 141:13 152:12 171:14 175:8,22 176:3 177:17	brought 196:15,24 197:12	canisters 104:3 118:10 119:20 150:14 188:23 207:18,20 208:12 211:18
background 89:21,24 108:24 116:14	began 96:23 110:3	Bruce 76:16	cans 174:18
backward 188:20 189:6	begin 51:16,18 52:7 54:22 89:10 167:4 176:14 179:4	budget 177:14	capacities 179:24
barriers 116:6	beginning 184:10 188:9 189:13 190:9,18 192:18 193:18 195:10	building 110:12,15	capacity 132:20
base 114:15	beginns 192:22	bunch 148:7	care 107:20
based 82:19 89:20 94:5 111:6,14 114:1 129:10 132:3,7,19 134:13 136:15 137:14 156:16 194:21 203:14	behalf 55:12 170:5,23	business 54:23 58:14	careful 98:13 187:22 211:24
baseline 183:9	belong 152:16	<hr/> C <hr/>	carried 115:23
bases 114:15	bench 196:6 197:6	CA-1 59:4,6	carrying 114:5 184:11 188:10 189:14 192:18 193:18
basic 145:4	benefited 133:16	cadence 210:21 211:20,23 212:15	case 83:13 95:12 100:20,24 118:25 156:19 163:17 164:7 191:25 192:6
basically 143:14 169:23 193:22	Besich 80:2	Cal 56:17,21 84:16,22, 23 85:5,8 89:9,14 113:19,25 114:6,11 120:14 133:19,25 135:6	cases 135:25 153:5,9 188:22 189:3 192:2 199:23
basing 114:19	billion 177:9,11	calculating 131:19	cask 94:18 97:4,5 189:2 196:1 199:16
basis 122:10 136:22 165:5 196:22 197:18	Bilovsky 77:1,18 78:4, 9,22 79:17 80:12 141:10,15 206:24 208:22 210:9	calculation 131:17,21 133:13	cast 112:2
Bauder 87:5,6,10,11, 16,19 88:5,11 89:6,17 91:20,24 99:11 105:24 108:8,13 120:13,16 123:17 124:5 135:7,12, 24 136:2,9 139:15 141:23 143:5 144:12 145:5,21 151:16 152:23,25 153:18 157:4 159:12 161:2 166:12 168:7,16 169:8 173:4 174:11,14,15 175:1 176:15 177:12,19 178:20 179:1,10 183:23 187:1 196:13,21	bit 87:12 89:23 100:10	calculations 95:15 132:2,3 133:3,4 208:4	causal 186:14
	board 145:25 146:8,19, 21,24 147:1	California 51:8 55:12 56:20 87:4 88:6 89:13 90:5 130:13 136:4 167:14 168:19 170:10, 11 171:8 172:1,2 173:4, 8 174:5 175:7,24 178:15 185:18 190:11 193:3,4 194:18,25 199:12 207:9 210:18 211:1	caution 110:8
	board's 146:23	call 54:24 84:11 85:17 86:16,20 87:3 94:18 96:14 98:19 99:5 100:2, 13 102:6 103:24 108:4 163:24 169:9 200:5 201:7	cavity 92:10,13,21,25 94:21 103:25 104:2 111:12 119:15 139:14 207:20 209:19
	bodily 119:5	called 88:6 146:8 153:24 192:3 213:5	CEC 96:9 103:25
	body 146:24	calls 87:4	center 99:9 100:12,19
	boss 199:11 205:7	Calvert 90:3	
	bottom 95:21 106:8 122:23 195:11 209:16	campaign 108:1 112:20,24 115:16 147:14 194:4,6	
	bought 103:7		
	bounds 160:22		
	breach 123:8 158:15		
	break 51:19,20 86:10, 12 134:20 166:21 213:24		
	breakdown 112:4		
	Bridget 51:15		
	briefing 53:16,18,20 54:1,3		

185:19 186:2 205:25	10 161:21	column 127:1,2,3,25	complacency 196:8 197:7
central 54:10	circumstances 137:5	comfortable 211:20	complete 148:14 149:20 151:3 153:13,14 164:15,20 173:20 178:11
CEO 199:11 205:8	citation 104:22	commence 132:5	completed 142:5 143:17 176:22 188:14 192:12 194:19,24 213:2
CEP 71:21 72:1,6,11, 16,21 73:1,6,16 74:6,10 204:9,14,24 207:5 212:21,25	cites 104:21 106:11	comment 184:1 203:13 209:14	completing 150:7
certificate 103:13	cities 199:21	comments 186:8,20 197:19 212:21	completion 142:18,19
CET 180:14	civil 102:3,8,11	commercial 121:12	compliance 64:4 65:15 103:13 110:16
CET 180:14	civilian 117:19	commingles 210:17	compliant 205:3
cetera 111:8 143:17	claim 125:18 128:20,22 158:3,7	Commission 51:5 56:21 64:5 65:16 89:13 98:18 104:11,21 106:2, 11 108:15 109:6 110:9 124:14,22 126:8,12 127:18 132:14 136:17 163:11,15,16,23 167:14 169:17 170:6,12 171:8 173:8 174:6 175:7,25 178:6 183:25	components 144:23 207:21
CFR 144:23	claimed 145:6	Commission's 136:13	composition 142:7
chair 190:7	claims 113:19 123:8 124:10 125:4,16 158:20	Commission-approved 162:11	comprised 136:3
chairman 140:7	clarification 74:24 83:8 85:7 135:22 168:7, 22,25 169:3 172:17 173:25 212:18	Commissioner 51:13	concept 200:24
challenge 146:15 183:5 207:23 208:8,14	clarify 115:4 122:5 132:18 152:20 156:4 172:21	committed 194:18,22 208:4	conceptually 112:7
chance 102:5 212:17	clarifying 156:4	committee 199:15,18, 19,22,25 200:6,10,23 201:4,7,12 202:6,24 204:4 205:18 206:3,13, 25 208:19 210:10,25	concern 150:22 183:13 206:16
change 81:21,25 154:3 163:1 173:5,10,12 174:2,5 176:16 180:17 200:20 201:2,5 204:22 213:13	clear 146:17 148:6 182:20 183:20 190:19 193:1 213:11	common 53:16,18,20 54:1,3	concerned 133:15 150:19
changed 90:18 131:10, 16 141:4,24 142:7,14 143:19 174:9 205:4	cleared 185:18	community 169:20,25 180:12 181:15 182:7 183:2 184:2,6 186:6 187:8 188:8 189:11 190:6 192:16 193:16 195:22 197:23 198:15	concerns 98:16 200:19,25 213:3
changing 157:8	clears 191:20	company 51:9 90:4 103:7 140:19 153:8 181:4 199:21 205:8 210:18	conclusions 146:3,16 154:21
channeled 163:18	Cliffs 90:3	comparison 177:6	concurrence 198:19
characterization 173:12	close 205:21 209:2 211:5	compensation 158:15	condition 98:6,8 99:6 100:8,14 108:3 110:14 115:8 152:4 167:16 171:12,22,25 172:1,2,4 175:23
characterize 147:20 213:11	closed 54:20 85:14	compile 83:3	conditions 162:10
Charles 57:15 59:8	closure 208:7	compiling 84:4	conduct 138:10 180:13
chart 140:23 144:11 204:18	CNO 203:2,5,17 205:5		conducted 137:2 143:4,15,22 192:6 209:24
charter 140:7 199:23	co-owners 200:1,5		conducting 192:5
checklist 199:3	Coastal 167:14 170:11, 23 171:8 172:1 175:7, 24		confer 52:17 53:18
checks 198:3,22,23	Code 84:24 144:17		conference 71:11 102:6
chief 90:10,20 168:21 169:1,4 170:1,19 179:18 180:3 181:10 203:5 210:23	collect 133:6		
choose 86:23 87:8 180:17	collected 163:3		
circulated 51:22 52:3,	collections 159:5 162:12,15		
	college 89:25		

confidence 203:19	content 58:3 171:11	correct 56:7 63:6 75:17 85:10,11,15 86:5,6 94:12 95:8,9 99:14 103:20,21 104:15 107:6 108:25 109:4 113:8 114:13,14,22,23 117:7 119:11 120:20,21 121:24 122:11,17 124:11,12 125:1 128:18 129:8,13 130:5 132:6, 22,23 135:18,19 137:16 144:4 149:9 151:18 157:9 158:21 164:17 165:14 169:12 170:3 179:18 181:20 182:11 184:17 188:15 189:20, 25 191:22 202:16 203:6,9 205:11 206:15 207:5 212:3	corrected 191:19	180:19 186:12 187:14
confidential 52:14 54:17,18,21 61:10,22 62:11,18 64:25 65:6 66:3,11 67:13,23 75:16, 20 76:17 81:7,21 82:1, 23 84:19,21,25 85:10, 13 145:2,3,6,20 202:19 205:14 213:19,20,25	contents 88:13 89:2 95:23 159:16	court 87:13 105:16 108:9 123:8 125:16 143:7		
confirm 82:7 84:6 86:3 91:3,20 94:4 120:16 179:12 206:10 208:5	context 106:18 109:19 197:8,18 199:1	cover 146:9 154:13 160:5,19 161:6,11 178:17		
Confirmatory 192:4	contingency 130:23	covered 125:19 129:23 140:22 144:7 162:17,19		
confirmed 173:7 204:8	continually 164:7	covering 158:3		
confirming 82:18 116:13	continue 124:2 130:14, 17 132:13 135:8 158:14 160:10 161:17 168:12 175:17 190:15 194:23	covers 128:17		
confused 127:11	continued 174:3 205:1	CPUC 129:23 133:10 163:5		
confusing 144:10	continues 208:25	create 83:18 133:7		
consequences 117:17 166:7,9	continuity 203:20	Creek 177:11 178:1		
consequential 153:11 156:24	contract 123:9 147:18 148:13,18 149:6,8,23 150:12,13 158:16 181:5,8,11 193:3	crew 92:23 94:15,17,18 96:25 97:6,7,13 99:7 107:24 197:11 198:23		
considered 192:20	contractor 97:9 137:7, 9,15 142:4 149:1 151:1, 25 152:9 192:24 194:8	crews 188:22,25 211:20 212:16		
consistent 183:8 190:21	contractors 136:21,24 137:3 152:21 153:5,7, 10 193:7,22	critical 183:11		
consists 140:24 146:5 199:19	contracts 153:10 181:4	cross 84:1 85:22 134:14 172:20		
Constellation 90:4	contractual 121:15,18, 20 122:2	cross-examination 51:23 52:8,10 53:8,9 54:8,17,18 58:17 84:1 86:1 89:7,15 134:10,12 135:7,9,24 136:1,7 167:23 168:14 177:3 179:8		
construct 129:7	contractually 121:10	cross-examine 135:17		
consultant 195:24 206:6 209:11 210:1	Contributions 63:1,9, 14,19 66:15,21	cross-examining 135:16		
contact 207:20,22 208:7 209:19 213:5	control 147:11 151:23 163:11,15,24	cross-exhibits 161:20		
contacted 97:4	controls 111:7 118:21	cross-time 85:20		
contained 91:21	conversations 154:4	Crosstalk 120:8 123:19 125:13 152:15 172:16 173:2,24 174:24 176:20		
container 92:10,14,21 93:1,8,16 94:11,15 96:11 99:23 101:2,18, 25 102:9,15 103:16,19, 22,25 104:3 111:12 112:12,15 114:25 117:24 118:15,25 119:12,15 207:22	convinced 185:24	cue 87:2		
containers 207:21,23 208:7	Coordinator 201:19	curious 177:19		
	copies 53:5,6,7,11,14 54:8,10 85:4	current 90:9 130:19 132:19,20 163:2,5 170:2,16 179:14		
	copy 53:3,13 56:8,25 90:24			
	corner 201:18 202:11 203:1 204:6 207:2 210:12 212:20			
		country 121:23		
		couple 168:7,8 169:16		

curriculum 116:19	day 51:18 86:5 93:5,18, 20 94:6 96:23 97:10 110:3 198:7 203:9	define 139:25	designated 82:22
customer 127:17 128:1 131:2 164:19 166:10 178:8	days 52:16 53:10,17 82:9 171:9 205:21	defined 196:16	designed 95:7,16 96:4 103:16
customers 126:16 129:1,19,21 131:2,8,14 133:16 159:5 166:6	DCE 62:1,6,18,22 66:7, 11 178:16	Definition 81:16	desire 149:20 151:3 197:15 204:11 206:9
cutaway 104:2	deal 94:15 202:19	deformed 96:5	desired 148:14
<hr/> D <hr/>	dealing 195:8	degree 116:15	detail 127:7
D.02 107:4	death 119:5	delay 112:4 153:16	detailed 131:8 151:17 186:14 191:3,16 192:6 199:3
D.16-12-063 106:4 114:21	December 69:24 74:19,23 75:3,7 181:7 191:4,17 200:9 201:12 202:5,14	delayed 186:12 187:14	details 93:4 149:11
Dalu 82:14 86:3,4	decided 101:6 103:19	deliverable 175:6	determination 211:14
damage 95:2 96:17 111:2	decision 104:22,23,24, 25 105:11,12 106:2,3,5, 11,12,16,17,21,23 107:1,4,7 114:21 128:25 129:23 132:25 138:9,15 139:3 163:5, 21	delivered 167:19	determine 104:12 147:13 192:2
damaged 96:2 111:11, 12	decisions 64:5 65:16 71:16 106:18 108:15 109:6,7 126:11	delta 177:13	determined 210:13
damages 123:9 153:5, 9,11	decommission 194:7	demolition 172:2,3 175:25	deterministic 208:1
Dan 190:7	decommissioning 51:10 61:11 62:12 65:20 66:1 67:2,4 69:13,23 90:10 104:14 114:5,8 129:15 130:15, 16,20 133:9 136:18 137:1,12 139:24,25 140:1,3,6,8,9,11,13,14, 17,24 141:1 142:1,3,6, 13 143:10,18 144:7,9 146:7 148:25 151:12,25 154:10 156:12 160:11, 23 161:7 163:22 164:15 169:18 170:11,21 175:25 177:7,8,9,15 178:4,5,11,17 179:17 180:2 181:1,6 200:4 206:12 210:22	demonstrates 107:21	develop 122:13
danger 118:7,16,22 119:2,4	DEE 124:10	Department 121:9 126:7 130:5 144:3,5 157:8	Development 58:1 167:7 170:24
dangers 115:13 117:13,23 118:1	deemed 146:11	depending 140:8 154:3 158:13	developments 105:13
DAO 140:10 141:4 144:9	deep 183:6,10	depends 105:9	DGC 81:15,20,25
Darcie 51:14	deficiencies 191:9,18	depleted 132:8 160:13 162:18	diagram 95:11
data 54:17,19,21 68:3, 7,11,15,19,24,25 69:5, 6,7,17 70:4,9,13 71:6 80:7,25 85:25 127:7 136:3,4 145:13 154:6 161:22,24,25 209:20,23 213:20		depletion 131:18 132:1	dialogue 185:14,21
date 98:17,24 99:1 106:25 121:14 122:1 132:4 168:25 170:17 172:10 197:25 199:6,7 204:8 207:13		deposit 157:10 164:22 165:2	Diego 51:8 199:20 206:15,18 209:13
dated 146:18		deposited 129:12 130:2 131:13 162:13	difference 146:9
dates 130:19 205:1 210:12 211:4 213:1		depositing 165:11	differences 194:3
dating 121:20		depth 186:15	differently 131:4
		describe 90:13 92:2 122:2 144:16 199:17	difficult 99:6 185:13
		describes 121:19 195:10,11,24 200:11	difficulty 188:23 189:1
		describing 98:21 194:3	dig 183:6,9
		description 69:23 188:16 194:1,2 195:3, 17	direct 53:6 59:4,8,13, 18,23 60:4,12,14,19 62:1,22 63:1,23 64:4 67:8,12,17,22 88:9 95:9 106:1,4 109:25 110:19, 21,24 111:4,8,11,16 119:17 141:2 146:24 157:19 163:17 167:25
		design 98:6,10 101:13, 16,20 102:14,15 103:5, 6,9,11,12,14,17,18,23 111:7 112:1 115:8 138:18	directed 97:6 172:14
			direction 82:20

directly 93:23 110:23 118:20 137:8 153:16 160:15 161:1 164:3 166:9 174:13	159:3,13 160:9 163:3	dynamics 148:18	117:4,11
Director 58:1 167:7 194:15	DOE's 121:19,21 123:4	<hr/> E <hr/>	
disagree 173:11 187:2	DOE-CLAIMED 126:4	e-mail 56:25 83:8,11,12	educational 89:24 108:23
disallowance 136:22	DOELMA 124:25 125:3,6 126:6	E2 61:4,7,20,23	effect 200:5
disbursements 120:3, 19 162:25	Dogs 167:3,8 178:25	earlier 55:6 57:1 82:20 83:8 84:20 96:25 101:17 115:3,4 116:8 126:20 144:8 174:16 175:11 209:14	effectively 154:23 178:11 180:21 189:2
disclose 186:10,16	Dogs' 167:9,25	easy 54:11 100:5	effectiveness 154:9, 21
disclosing 145:2	dollars 131:3,19,22 133:8,10 160:8,23 161:14,15 163:3 165:11	EC 74:19 75:3,8,20 76:1,3,11,17,21 77:2,6, 16,18,23 78:4,9,14,22 79:2,12,18,22 80:3,13, 21 81:11 200:23 201:7	effects 111:6
discovered 138:20	dose 118:11,13,15,24 119:8,10,13,19	ECP 201:19	effort 188:2
discuss 54:20 71:16 107:7 136:12 155:5 157:7 206:4 210:5	Doug 87:5,16	Edison 51:8 52:10,17, 20,23 53:19 54:2 55:10, 13,15 87:4 88:7 90:5,7, 20 97:5 98:8 101:4 103:1 112:17 130:13 136:4 137:1,5,14 138:15,17,22 139:3,7, 10,17 143:25 144:12 145:7 146:2,6,14,17,20, 25 148:12,14 149:1,6,7, 14,21 150:9,12,16,17, 19 151:14,19 152:4 153:4,8,22 154:15,17, 25 155:14,23 158:10,14 160:17 161:10,14 162:21 163:16 164:22 165:6,8,9 168:19 170:5, 10,23 171:11 172:2,5 173:5 175:2 180:17 182:20 185:19 188:11 189:19 190:11,24 191:5,10 192:20 193:3, 4 194:18 195:10 198:25 199:9,12 202:15 205:20 207:10 210:17,18,24 211:1,6 212:24	EIR 170:6
discussed 54:16 55:6 118:4 166:20 175:8,22 207:17 209:9	download 97:1,7 189:3	Edison's 136:20,23 148:22 152:7,20 157:7, 10 158:19 159:3 160:21 161:5,23 163:4,9 164:6, 18 172:6 179:18 180:3 194:25 195:11,22	elaborates 188:9 189:13 193:17
discussing 107:23 174:12	downloaded 96:22 97:3 110:2	education 116:19	Elaine 51:12
discussion 82:9 84:20 101:4 109:9 210:3	downloading 92:23 96:23 110:3 138:22 188:23 193:2		Electric 51:9 199:20 206:15,18 209:14
discussions 99:3 100:9 154:20 194:17 201:8 205:6	downsizing 143:22		elevation 183:15
disputing 189:19	draft 52:9 58:16 91:3		eligible 82:22 85:12
distributed 126:16 127:8 131:7	drafted 91:20		Ellis 76:16
distribution 83:15 130:7	drafting 91:4 121:1		emphasized 192:17
Division 173:8 174:6 194:15	drawn 114:1 139:21		employee 196:24 200:19,25
document 83:23 90:24 91:7 113:18 124:6 127:12 145:19 183:17 186:20 189:23	driver 183:14		employees 137:2
documents 201:21	drop 100:16 103:3 147:22 155:7		enclosure 92:10,13,21, 25 94:22 103:25 104:2 111:12 119:15 139:14 207:20
DOE 63:23 65:15 66:25 120:3,19 121:9,14,17 122:3,10,12,15 123:7 124:10,16,21,24 125:4 126:11,21 127:4,7 128:1,10,17,21 129:7, 11,17 130:1,12 131:7 132:4,10 133:1,5,7,13	dropped 95:20,25 147:22 156:21		enclosures 209:20
	dry 115:18 190:12 191:5 194:6 198:22		encounter 188:25
	drying 211:18		end 51:21 52:12 53:22 81:15 93:24 103:7 107:17 132:9 134:10,19 135:9,13 150:2,16 165:23 166:2 169:6 170:20
	DTF 177:8		ending 98:22
	due 111:5,24 112:3 118:4 142:8 147:18 204:9		ends 105:6
	duration 119:10 132:19 194:4,9		Energy 90:4 121:9 126:7,9,13 129:22 130:5 157:9 173:8 174:6
	duties 108:14		enforce 160:17
			Enforcement 71:11,16

engaged 124:9 153:13, 14	essentially 109:5 149:5 191:22 211:2	excess 164:13,19 178:8	119:25 120:18,25 122:19 124:6 136:12 145:4,6,11,15,23 147:4 154:2,5 157:5,19 158:25 161:20 173:17 181:13 182:2,14,19,24 190:24 201:15 202:10, 25 204:5 205:19 206:2 207:1 208:20 209:7 210:11 212:19
engagement 169:20, 25 180:12 181:15 182:7 183:2 184:2,7 186:6 187:8 188:8 189:11 190:6,7 191:2 192:16 193:16 195:23 196:20 197:23 198:15	establish 123:4 124:13,20 171:21 175:14	exchange 184:9 190:9	exhibits 52:7,9,11,13, 15,18,19,21,23,24 53:6, 8,9,11 54:8 58:15,16, 17,22 59:17 70:23,24 76:7 81:6 82:4,8,13,19, 20,23 83:9 84:7,19,21 85:10 88:13,14 89:1,3 119:23 135:23
engages 144:13	established 177:22	excuse 59:22 60:23 64:13,25 75:13,24 81:5 87:11 101:16 122:8 124:10 125:8 145:12 165:9 186:16	existing 157:13 163:21
engineering 116:15 142:24 153:23	estimate 69:13 130:20 134:5,8	executed 85:5	exists 144:14
ensure 83:14,16	estimates 62:13 67:4 178:5 203:14	execution 141:2 148:16	expect 198:6
ensuring 143:15 148:19	estimation 95:17	executive 195:24 199:15,18,19 200:6,10 201:4,7,12 202:6,24 204:4 205:18 206:3,25 208:19 209:9 210:3,5, 10,23	expected 173:20 211:6
enter 52:18 135:25	evaluate 146:10 206:6 209:11	exercise 212:17	expects 158:11
entered 52:25 116:16 154:18	evaluating 208:3 210:1	exhausted 130:16	expenditure 167:12, 13,18 172:10 173:5,9 174:4,8
entering 52:13,22	evaluation 93:21,22 138:11 200:14	exhibit 52:9 58:16,22, 23 59:1,3,6,7,10,14,16, 19,21 60:1,3,5,7,9,11, 16,18,21,23,25 61:2,4, 7,9,13,15,18,20,23,25 62:3,5,8,10,14,16,19, 21,23,25 63:3,5,7,10, 12,15,17,20,22 64:1,3, 6,8,10,12,14,17,19,22, 24 65:2,4,7,9,11,13,17, 19,23,25 66:4,6,8,10, 12,14,17,19,22,24 67:5, 7,9,11,14,16,19,21,24 68:2,4,6,8,10,12,14,16, 18,21,23 69:2,4,9,11, 14,16,19,21 70:1,3,6,8, 10,12,15,17,20 71:5,7, 9,12,14,17,19,22,24 72:2,4,7,9,12,14,17,19, 22,24 73:2,4,7,14,17, 19,22,24 74:2,4,7,9,12, 17,20,22 75:1,4,6,9,11, 15,18,21,23 76:4,10,13, 15,18,20,23,25 77:3,5, 8,10,14,15,17,20,22 78:1,3,6,8,11,13,16,21, 24 79:1,4,6,9,11,14,16, 19,21,24 80:1,4,6,9,11, 14,19,22,24 81:1,9,12, 14,17,19,22,24 82:2 83:2,20 84:1 89:22 91:1,4,5,22,25 94:9 95:6 96:20 114:16	expenditures 172:8 175:3 199:24
entire 83:9 142:19 164:19 171:1 178:17 180:15	event 92:3 93:25 94:2,5 96:6 97:15 98:25 99:5, 12 100:6 107:25 108:2, 5 109:25 110:5,8,13 111:23 112:13,19 113:23 114:8,25 138:15 139:18 186:10 189:6 200:13 201:14	exhausted 130:16	expenses 61:12 125:9, 19
entities 85:2	events 105:13	exhibit 52:9 58:16,22, 23 59:1,3,6,7,10,14,16, 19,21 60:1,3,5,7,9,11, 16,18,21,23,25 61:2,4, 7,9,13,15,18,20,23,25 62:3,5,8,10,14,16,19, 21,23,25 63:3,5,7,10, 12,15,17,20,22 64:1,3, 6,8,10,12,14,17,19,22, 24 65:2,4,7,9,11,13,17, 19,23,25 66:4,6,8,10, 12,14,17,19,22,24 67:5, 7,9,11,14,16,19,21,24 68:2,4,6,8,10,12,14,16, 18,21,23 69:2,4,9,11, 14,16,19,21 70:1,3,6,8, 10,12,15,17,20 71:5,7, 9,12,14,17,19,22,24 72:2,4,7,9,12,14,17,19, 22,24 73:2,4,7,14,17, 19,22,24 74:2,4,7,9,12, 17,20,22 75:1,4,6,9,11, 15,18,21,23 76:4,10,13, 15,18,20,23,25 77:3,5, 8,10,14,15,17,20,22 78:1,3,6,8,11,13,16,21, 24 79:1,4,6,9,11,14,16, 19,21,24 80:1,4,6,9,11, 14,19,22,24 81:1,9,12, 14,17,19,22,24 82:2 83:2,20 84:1 89:22 91:1,4,5,22,25 94:9 95:6 96:20 114:16	experience 89:24 90:1 117:5 156:17
entitled 90:25 120:18 126:21 202:7,12 203:1 204:6 207:2 210:10	evidence 52:13,19,23, 25 135:25	ex- 120:17	expert 138:17 140:4
entity 144:14 183:18 210:17	evidentiary 51:6 82:9	exact 198:17 199:2 201:6	expertise 156:17 177:21
entry 203:2 204:7 207:3,12	events 105:13	EXAMINATION 88:9	explain 177:12 210:2
environment 130:14 178:9	eventually 185:22	examines 103:17	explained 114:9 165:16
episode 155:25	evidence 52:13,19,23, 25 135:25	examples 169:16	explains 173:17 186:7
equipment 101:20 103:10 111:2 112:23 138:19 148:7,8 187:18 203:16 212:16	evidentiary 51:6 82:9	Excel 84:5	explanation 181:25 182:10,12 184:16,17 186:18
equity 131:1 133:15	ex- 120:17	excerpt 69:12 181:14 184:5 186:5 188:7 189:10 190:5 192:15 193:15 194:12 195:7,21 202:4,22 204:2 205:17 206:23	exposed 118:13,17,20, 24
ERRA 126:9,12 129:21 157:13 163:4,13,20,21 164:2,7	exact 198:17 199:2 201:6	Excerpts 69:12,22	exposure 119:2,10
errata 60:8,25 61:5,16, 21 62:6,17 63:13,18 64:20 65:5 88:14	EXAMINATION 88:9		express 187:12
essence 193:9	examines 103:17		

extended 119:7 147:18 149:15 197:13 198:21	feet 95:21 96:2	fixed 181:5 191:23	Freedman 57:7,8 82:6, 11,12 83:2,7,14,22 84:4 135:19,21 136:8 138:2 141:7,11,22 143:9,23 145:17,18 152:19 157:3 159:9,11,19,21 166:11 167:1 193:9
extending 175:1	FEIR 169:17 170:5	fixed-price 148:13 149:23 150:13	Freedman's 153:1
extension 112:14 113:20,23 153:16	fell 111:13	flag 167:17	front 165:23 182:25 184:8 187:11 190:4 197:25 204:14
extent 96:3 161:16	field 138:23 141:2 191:15	flaw 101:16,20 102:14, 16	frustration 186:9,21
external 126:14 206:5 209:11 210:1	figure 95:11 104:1	flexible 158:13	FTO 138:10,16,23 139:3,17 142:11,18,20 147:14,18 188:3 191:15,19 202:7 203:9, 14 205:10,21 207:12,13 209:1 210:10 211:6 212:22
extremely 111:17	figures 104:1	flow 157:8 160:8 163:24 213:24	fuel 92:9,11 95:2,3 96:4,15 97:9,10,16,20, 22,23 98:2,14,21 100:4, 21 102:22 110:6,15 111:25 115:10,17,18 117:6,14 118:9 121:11, 23 122:3,11,13,16 123:6,11,13,21 124:16 129:8 130:4,10,18,19, 25 131:3,6,11,23 132:5, 10,13 133:2,6 139:13 141:5,12,25 142:8,20, 21 143:13,17,19,20 147:12,23 148:2,4,16, 21,23 149:20 150:4,7, 14 151:11,20,21,22 152:5 153:17 154:23 155:5 159:4 160:5,12, 20,24 161:8,11,17 162:14 164:20 180:21 187:9,10,19,22 188:21 190:12,25 191:7,10 192:1 194:6,13,19,23 195:1,9 197:9,13 198:1, 2,16,25 200:16,22 202:8 203:19 204:13,15 205:2 206:11 208:9,23 211:13,18 212:13
eye 94:5	file 170:23	focus 100:10 180:20	fully 100:11 102:23 131:6 138:24
<hr/> F <hr/>			
faced 148:13,15 150:15	filed 98:25 99:8,13 100:25 123:7 124:13,21	focused 143:1	
facilitate 143:22 194:7	files 54:11	follow 51:23 169:24	
facility 155:19 156:11	filing 129:22 170:17,20 171:6	follow-up 93:20	
fact 99:17 150:24 159:13	final 110:11 128:25 132:8 146:20 153:15 154:21 198:5,22,23	footnote 92:18 106:7, 14 137:18 139:22,24 204:16	
fact-finding 93:20	finalized 207:14	footnoted 92:18	
factual 88:20	finally 53:4 84:10	footprint 153:7	
failed 111:3 121:14,18	finance 151:12,15	force 143:3	
failing 111:8	Financial 63:2,9,14,19 66:15,20	forecast 206:5 209:10	
fails 114:6 158:22	find 105:3 112:5 113:11 167:12 172:12,13 174:8 175:13 183:10	forecasting 205:20	
failure 111:3,6 121:22 123:4 153:6 155:10	finding 104:8	forensic 167:9,10 171:17 172:7,12	
fair 115:3 136:15 137:3	findings 101:22 114:1 146:2,15 154:15,17 194:22	forgot 175:15 197:1	
fall 96:1 118:3	fine 82:16 89:19 105:21 134:15	formal 99:8 117:4 185:19 186:1 187:7 191:8 192:10	
falls 211:1	finish 133:25 213:25	format 83:1,20 99:18, 20	
familiar 117:13 136:16 171:7 212:16	finished 135:6 167:1 178:25	formed 140:4	
familiarity 116:12	firm 100:23 107:24 153:23	forward 83:13 131:12	
faster 105:17	first-of-a-kind 99:5 100:6	found 136:21 138:17 167:17 181:19	
fatigue 196:7 197:7	Fiscal 65:14	foundation 171:21 182:14,19 183:16 184:19 186:19 189:23 196:9,19 198:11	
faulted 98:22	five-minute 213:23	fourth 212:18	
favor 126:2	fix 192:5	frame 181:12	
Feb 203:2,9 204:7		Framework 59:24	
February 76:11,16 80:2 81:20 90:6,15 168:19 204:3		frankly 186:10	
federal 123:8 125:16 126:5 129:18 144:8,16,			

function 90:21 96:4 199:17	generated 117:15		hide 186:11
functional 101:13	Generating 121:11 145:24	<hr/> H <hr/>	high 118:15
fund 63:1,9,14,18 66:15,20 130:17 132:21,23 151:7 159:4 162:24 172:5 177:8 178:4,14 200:21	generation 210:20	half 117:2	higher 156:6 178:16
Fundamentally 142:6	genesis 213:9	halted 110:13	highest 98:13 108:7 115:22 148:20 156:13 187:23 199:5
fundamentals 178:17	gentleman 181:22	handle 198:1,2	highlighted 186:22 195:13 205:19,24 206:2 208:20 209:8,16,25
funded 160:6	geologic 122:13 123:5	handled 131:4 211:17 213:13	hindsight 113:22 114:2 188:19 189:5
funding 130:18 132:20 163:6,12 172:9	Gerald 195:23	handling 99:24 100:21 101:2,25 102:9,11 117:18 188:21	hired 168:19
funds 130:3,8,25 151:13 157:16 160:4,7, 18 161:6 162:13 163:17,18,19 164:13, 16,19 174:7,12 177:7, 10 178:8 200:4	get all 197:14	hang 142:9 147:8	historically 155:21
future 94:3 105:13 120:3,18 131:2 132:14 133:16 157:11 158:19 159:5 162:10	give 89:23 109:19 110:25 120:5 140:20 145:7 163:11 181:17 192:10 199:6	hang-up 107:25 108:4 115:9 118:4 188:25	history 155:16,19
	giving 141:18 163:23	happen 119:8,13 165:18	hit 165:23,24
<hr/> G <hr/>	goal 53:21,23 86:11	happened 93:4,17 94:1 95:22 111:16 112:10 122:14 181:5 188:1 207:19	hold 98:12 137:21
gain 165:9,11,12	good 51:11 53:2 55:11 56:3,18 57:7,14,23 89:17,19 94:1 117:4 135:20 136:9,10 167:6 179:10,11 207:15	happening 121:25	holding 192:23
garner 204:13	gouges 174:18 175:12	hard 53:5,6,7,11,13,14 54:8,10	holds 103:11 105:12
Gas 51:8 199:20 206:15,18 209:13	governed 178:14	harm 119:6	Holtec 97:9,13 100:21 103:9,10,15,22 138:19 144:13,14,18 147:10, 13,18 148:3,7,9,12,13, 15,19 149:2,7,16,19,22 150:3,11,13,15,18,20, 22,25 151:6,11 152:6 153:13,16 181:10 191:5 192:23 193:1,21 195:24,25 196:14,16, 23,24 197:4 203:9 213:15
gave 102:5 168:23 192:12	governing 146:24	heading 212:20	Holtec's 103:19,23 151:15 192:20 196:5 197:5 200:13
Geesman 54:7,13 56:11,12 58:24 75:13, 15 81:3,4,5,8 82:6,17, 24 83:6 84:4 85:21,23 86:1 179:4,6,9 182:18, 21,23 183:19,22 184:22 185:3,8 188:4 190:2 196:12,18 197:1,3 198:13 202:1 203:24 213:17,21	Government 126:5 129:18 158:15,20,22	heads 53:24	honest 198:24
general 148:25 151:25 152:7 153:4	governs 100:3 162:24	health 117:13,23 118:2, 7,16 156:25	honor 54:7 55:11 56:3, 11,18,24 57:7,14 58:7 75:13 81:3 82:11,17 83:6,7 84:15,18 85:11, 15,19 87:9,16,22 88:4 89:6,11 91:16 105:20 109:23 120:12 123:20 124:1,4 133:19 134:9, 17 135:19,21 152:19 153:3 156:8 157:3 167:21 172:15,18 173:15 175:19 179:6 182:21 184:22 196:18 203:12
generalize 115:15	graded 183:8	healthier 178:18	
generally 123:12 136:16	graduate 89:25	healthy 178:9	
	graduated 89:25 116:15	hear 213:5	
	greater 155:25	heard 212:24	
	green 205:19,24 208:20	hearing 51:6 82:10 84:7 166:15 167:23 170:24 177:6	
	grounds 184:20	hearings 52:12 53:22 84:10 86:8 113:12	
	group 140:3,15 144:12 146:8,10 210:17,19	held 90:14 170:25	
	guess 153:7 175:18 177:19	helpful 111:17 176:2	
	gussets 95:14	helping 54:10	
	guys 53:25	helps 111:16	
		hiatus 98:2	

hope 103:11 111:16 191:20	identifies 182:16 210:12	22,23 111:1,3 112:16 117:25 118:2,8 141:5, 25 142:9,13 148:17 150:10 151:11 152:14 155:6 183:5 188:21,25 194:20 196:1 199:16	initiated 167:8
hoping 133:24	identify 52:8 58:15,21, 23 59:4,16 68:1,2 71:5 73:14 74:17 75:1 80:19 81:6,9 86:21,24 87:2,6 137:8 145:11 182:14 183:17 184:21,23 186:20	incidental 207:19,22 208:7 209:19 213:4	initiating 171:1
Horan 51:15	ignore 138:8	incidents 108:15 203:21	initiation 153:22 171:2
Houck 51:14	Ill-1 125:20 126:21 127:3,6,17 128:1,16	include 135:14 157:15	INMG 210:14,15,16,21 211:2
hour 54:19 84:10 86:8 134:23 166:14	imagine 137:9	included 90:20 154:24	inquiry 172:7
hours 86:11	immediately 187:10 188:1	includes 97:21 141:1 203:2 204:7 207:3	inside 96:5 118:14
housekeeping 51:17 54:5 166:20	impact 133:2 150:20 200:3	including 93:20 112:22 161:7 194:18	insomuch 188:18
Howell 184:10,21,23 192:17,22 193:10 194:14 195:9	implement 98:9	increased 151:15,17	inspected 101:20 190:16,20 208:11,12
Howell's 195:3,17	implementation 154:25 212:7	incremental 148:11 150:10 151:10 152:8 160:5	inspection 93:22 101:6,7,9,11,23 167:15 172:6 173:6 185:16 191:3,8,9,16,18,25 192:7,12
human 117:13,23 118:1,7,16	implemented 94:2 154:22 194:21	incurred 61:12 65:21 66:2 67:2 104:13 110:22 125:4 147:17 149:2,15	inspections 144:20 183:9 208:5,13 209:21
hung 98:7 138:21 139:13 187:10	importance 102:19	incurs 152:9	install 123:10
hypothetical 113:25 114:12	important 100:19 115:20 119:11 161:13 168:17 199:4	independent 92:11 96:14 115:19 123:21 167:15 172:5 173:6 194:24	installation 92:12 96:15 115:19 118:10 123:21 124:17
I	importantly 173:13	Indian 177:10 178:1	instance 187:25
idea 53:25 111:19 211:21,22	imposing 150:22	indicating 204:8 207:13 209:8	Instructions 79:8
identification 59:2,6, 11,15,20 60:2,6,10,17, 22 61:3,8,14,19,24 62:4,9,15,20,24 63:4, 11,16,21 64:2,7,11,18, 23 65:3,8,12,18,24 66:5,9,13,18,23 67:6, 10,15,20,25 68:5,9,13, 17,22 69:3,10,15,20 70:2,7,11,16,21 71:8, 13,18,23 72:3,8,13,18, 23 73:3,8,18,23 74:3,8, 13,21 75:5,10,22 76:5, 14,19,24 77:4,9,21 78:2,7,12,17,25 79:5, 10,15,20,25 80:5,10,15, 23 81:2,13,18,23 82:3 135:23 145:16	imposition 102:3	indication 205:20 206:2 208:21	intact 161:16
identified 52:24 63:7 64:14 75:18 77:14 82:8, 18 88:13 89:2 97:3 98:8 100:8 164:14 189:24 194:14 196:10 198:12 207:18	improve 111:25 112:1 148:16 150:24	indirect 110:4 111:5, 20,21,22 112:7,9	integrated 180:16
	improvements 116:6 147:24 148:7 149:24 188:18 190:17 200:19, 21 203:16,18	industry 100:7 177:21	integrity 207:23 208:6, 14
	imprudent 114:9	information 85:1 91:21 93:19,22,25 117:22 145:3 174:17	intend 135:25 158:14
	in- 125:18	informational 98:19 199:25	intends 161:14
	inaudible 204:18	informing 210:19	intent 160:21 161:5
	incident 93:9,16,18,20, 21 96:11,18 97:18 98:5, 15,18,21 99:3,16,17,22, 24 100:13 101:2,10,25 102:9,11,16,17,18 107:25 108:14 110:20,	initial 121:8 172:7	intention 204:15 211:8
		initially 90:15 165:19	intentionally 108:9
			interested 141:12
			intergenerational 131:1 133:15
			interject 105:14 123:16 141:6 213:17
			interjects 190:14 193:5
			internal 140:12 198:4 210:16
			International 210:18, 24,25

interpret 99:6 100:1 108:15	19 208:1,2 213:6,8,12, 13	judge 51:4,11 57:23 84:6 167:5 168:5,13 171:16 193:21	20,22 59:9,13 82:7 176:18,19,21,24 177:1, 4 178:23,24 179:2
interpretation 109:6,7	issued 101:1,8 106:23 107:1 155:13 171:9,25	judgment 88:24	language 106:1,7
interrupt 213:24	issues 66:16,21 100:19 103:18 186:15 187:18 194:13	judgments 88:23	large 151:1 153:7
interrupts 190:18	issuing 206:5 209:10	Julie 52:25 83:4	lastly 135:10
interval 101:7	item 52:7 53:16 154:22 171:16 204:18 209:8,25	July 78:14,22 97:11,16, 24	late 51:21 90:21 168:23, 24 179:15,19
intervenor s 163:25 164:4	items 54:5 147:24 149:22	June 73:20,25 74:6,10 78:9 167:19 194:12 195:8,22 197:22 198:10,16 204:23,24	latent 98:6
intervenor 's 138:8	IV 183:3,25 189:12 190:8 194:16,17		Lau 51:4,12 54:9,14,16 55:16,19,22 56:1,6,9, 16,22 57:2,5,12,18,21, 23,24 58:4,9,13,20, 59:3,7,12,16,21 60:3,7, 11,18,23 61:4,9,15,20, 25 62:5,10,16,21,25 63:5,12,17,22 64:3,8, 12,19,24 65:4,9,13,19, 25 66:6,10,14,19,24 67:7,11,16,21 68:1,6, 10,14,18,23 69:4,11,16, 21 70:3,8,12,17,22 71:4,9,14,19,24 72:4,9, 14,19,24 73:4,9,12,19, 24 74:4,9,14,16,22,25 75:6,11,14,17,23 76:6, 9,15,20,25 77:5,10,13, 22 78:3,8,13,18,20 79:1,6,11,16,21 80:1,6, 11,16,18,24 81:4,8,14, 19,24 82:4,16,24 83:12, 19,24 84:6,9,17 85:6, 12,16 86:2,7,15 87:6, 18,23 88:1 89:8 91:15, 17 105:14,21 108:8 109:21 120:9,11 123:16,23 124:3 127:13,15 133:21 134:15,18 135:4,20 136:6 137:24 138:1 141:19,21 143:5 145:8, 10,17 152:23 156:4,16, 22 157:2 159:9,15,19 166:14,18,25 167:5 168:5,10,13 171:16,20 172:23,25 173:23 174:10,20 175:4,8,13, 21 176:2,10,12,24 177:18 178:20,25 179:3,7 182:18,22 183:19 185:1 186:23 189:25 196:20 197:1 201:22,24 203:23
interviewed 101:21	J	K	
introduce 55:1 57:24 82:19		Karly 71:1	
introduction 121:8 168:2		keeping 53:1 108:6 151:23 157:18 161:16 187:22	
investigate 97:18	Jacob 55:8 86:18	Kerry 74:23 75:2,7 200:12 201:11 202:5	
investigated 101:1 102:23	January 51:2 71:10 75:20,25 76:2 112:20 191:11,19 202:15,16,23	key 208:23	
investigation 101:10 194:20,22,24	Jerman 52:15 53:17 55:11,12,17,21,25 58:5, 7 82:6,25 83:3,5,20,21, 25 84:3 85:18,19 86:6, 20 87:3,4 88:2,4,10 89:6 134:2,5,7 135:14 141:6,11 152:10,16 159:7,15,17 167:21 171:13 173:11 174:10, 21 175:16 176:13 177:16 182:13,19 183:16 184:19 186:19 189:22 196:9 198:11	kind 53:2,19,24 54:2 70:24 95:2 111:20 133:25 158:11 160:18	
investigations 98:23	Jim 75:24,25 76:2,11 202:23 204:3	Kinosian 67:8,12,18,22 85:21	
investment 132:24	job 54:11 90:9 144:21 193:24 194:8	knew 105:10 167:18 172:10,11 186:13 197:18 213:6	
involve 137:10	jobs 142:25	knowledge 94:4 99:21 152:24 153:1 155:15,17 158:9,12 187:15 213:3	
involved 96:11 98:5 101:21 107:25 111:1 115:16 116:1 117:25 118:3 154:20 170:20 191:4	John 56:11 58:24 82:17		
involvement 180:25	joined 90:15		
involves 198:3	joining 90:14 91:13		
involving 142:9 143:19,20 148:18 162:19	Joint 51:7 70:18 173:17		
IRS 165:1,20	jointly 150:23		
ISFSI 92:11 93:5,12,15 96:14 97:1 100:3 118:10 123:10,18,21,23 147:10,12 154:11	Jose 152:2		
ISFSIS 123:11			
issue 101:13 102:2,4 131:1,20,25 133:15 152:9,21 157:20 164:1, 6 173:13,15,18,19 183:5,8 185:10 187:9 193:17 206:13 207:18,			
		L	
		label 127:1	
		labeled 95:11 121:8 127:4,25	
		lack 191:21	
		laid 187:10 188:17	
		Lands 169:17 170:4,6	
		Lane 53:1 54:10 83:4, 12 84:2	
		Langley 57:14,15,19,	

213:17,23	213:14	loss 155:7	206:9 211:14,17,19,25
law 51:4,11 108:24	limited 211:7	lost 111:13	makes 144:24 181:23
lawsuits 123:7,14	Linda 184:9,23	lot 93:19,25 198:20 203:15 204:19	making 104:8 184:1 198:14 213:10
lay 152:2	Linda's 184:24	loud 108:20 127:23,24	management 65:14 97:15 99:7,19 105:9 109:10 114:13 117:6 162:14 173:7,18 179:16 180:2 198:4,25 199:8, 10 207:3,7 210:16,25
layperson's 109:6	lined 213:1	low 115:6 119:19 164:9	manager 90:16 104:18 107:9,20 108:16 109:10 114:3,13,17,20 140:25 196:25
lead 169:19 170:5,9,13, 14 171:18	lines 91:25 93:10 104:7,9 109:10,14 121:6 122:22 123:2 124:8 125:24 126:2 159:23 197:23	low-level 156:14	managerial 105:11
leaders 199:20	list 51:22 52:9,18,19,20, 24 53:1 54:4 58:16,21 65:10 70:23 82:15,22 83:1,2,3,9,10,15,17,20 84:4 85:9	lower 201:17 202:11,25 204:5 207:2 210:12 212:20	managers 194:17
leadership 180:18	listed 138:24 142:2 158:18 159:13 177:25	lowered 92:9,24 93:13 94:21	mandated 84:25
leap 184:24	lists 83:5	LPI 167:16,19	manner 183:7
leaving 119:15	litigate 164:1	lunch 51:18 54:19 134:20 135:5	manufacturer 103:10 138:19
left 100:15 132:10 197:13 213:22	litigation 63:23 65:15 66:25 120:4,19 124:16, 21,24 125:3,9,10,11 126:7,11,14,15,21 127:7 128:7,10,17 129:11,17,20 130:1,7 131:7,13 133:7 157:9 158:13 159:3,14 160:9 163:3 164:23 165:10,13	M	March 71:15,21,25 72:6,11,16,21,25 73:5, 16 76:21 77:1 170:7 180:13 181:15 182:6 183:1 184:2,6 186:6 188:8 189:11 190:6 192:16 193:16 205:11, 18,22 206:24 207:5,25 213:2
left-hand 126:25	live 199:7	machinery 98:10 112:3 149:25	margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
left-most 127:2,3	load 73:9 76:6 100:16 111:13 118:6 195:9	made 53:12 105:11 138:15 139:3 149:25 168:11 174:3 185:5,19, 25 187:7 188:11,18 195:25 200:2 201:12 202:5,23 204:3 206:24 210:9 212:10,22	marked 59:1,6,10,14, 19 60:1,5,9,16,21 61:2, 7,13,18,23 62:3,8,14, 19,23 63:3,7,10,15,20 64:1,6,10,17,22 65:2,7, 11,17,23 66:4,8,12,17, 22 67:5,9,14,19,24 68:4,8,12,16,21 69:2,9, 14,19 70:1,6,10,15,20 71:7,12,17,22 72:2,7, 12,17,22 73:2,7,17,22 74:2,7,12,20 75:4,9,16, 18,21 76:4,13,18,23 77:3,8,14,20 78:1,6,11,
legitimate 185:25	loading 94:18 97:4,5 101:22 147:12 189:2 194:13 196:1 199:16 211:12,18	mail 53:5	marked 59:1,6,10,14, 19 60:1,5,9,16,21 61:2, 7,13,18,23 62:3,8,14, 19,23 63:3,7,10,15,20 64:1,6,10,17,22 65:2,7, 11,17,23 66:4,8,12,17, 22 67:5,9,14,19,24 68:4,8,12,16,21 69:2,9, 14,19 70:1,6,10,15,20 71:7,12,17,22 72:2,7, 12,17,22 73:2,7,17,22 74:2,7,12,20 75:4,9,16, 18,21 76:4,13,18,23 77:3,8,14,20 78:1,6,11,
length 187:17	location 93:12	mailed 53:12	mark 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
lengthy 146:5	locations 96:13	maintain 52:24 123:10 130:3,9	margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
Letourneau 90:1	lofty 53:23	maintaining 143:1 148:24 151:20,22,24	margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
letter 79:7 81:15 162:24 163:2 165:20 191:14 192:3,4	long 116:18,25 119:10 158:22 194:3,5 210:21	maintenance 142:25 167:15 172:6 173:6	margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
Letters 69:12	long-term 160:19 161:8	major 181:4	margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
level 143:8 155:7,9,11, 12,13,25 156:12,13,14	longer 142:23 143:2,21 151:21	make 52:5 53:2 54:11, 24 55:4,5 58:9 83:25 98:9 101:15,19 102:14 112:1,21 113:10,11 115:22 143:7 144:22 146:13 148:5 149:7,24 155:10 165:6 180:17 190:20 191:6 197:10 198:21 201:20 203:13, 16 204:14,20 205:2	margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
levels 108:7 115:22 137:11 148:20 156:5 187:23	looked 56:24 106:3 118:5 119:16		margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
license 110:17 122:13 213:14			margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
licensee 102:5 103:2 115:21 183:7 192:2,5 193:1,4			margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
licensees 100:21 103:13			margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
licensing 183:8			margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
lieu 84:1 85:25 136:1 162:15			margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
light 105:12 112:10			margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
limit 119:2			margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18
limitation 160:18			margin 52:8 58:14,15,21, 22 59:3,16 68:1 71:5 73:14 74:17 75:1 80:19 81:9 145:11 208:25 209:18

16:24 79:4,9,14,19,24 80:4,9,14,22 81:1,7,12, 17,22 82:2,8 84:7 91:1, 5 94:9 95:6 120:3 135:22 145:15 154:2 161:20 181:14	183:2 184:2,7 186:6 187:9,24 188:8 189:11 190:6 193:16 195:22 197:23 200:5,6,10 202:6,23 204:4,9,23,24 206:17,25 207:5 208:19 209:24 210:9,21 212:25	191:12 199:4,5	Monica 59:5
match 107:4	meetings 169:21,23 206:19	mindful 145:5	monitoring 142:4
matched 106:18	member 198:23	minds 180:20	month 99:2,23
matches 96:15	members 140:7 197:11,12 200:23	mine 211:22	months 180:13 193:23 201:13
material 88:16,19,22 194:16 195:14	membership 199:17	minimum 178:14	morning 51:11,20 52:21 55:11 56:3,18 57:7,14,23 58:10 82:20 84:20 89:17,19
materials 119:15 199:14	memorandum 124:13, 15,20,24 126:7 133:11 163:6,12	minor 97:12	Morris 181:23 183:3, 17,20,21,23,24 189:12, 24 190:8,14,18 191:1, 12 192:8,17 193:5,10
mathematical 131:17, 21	mention 87:17 98:11 101:15,19 102:14 112:9,18 133:9 185:15	minus 213:19	Morris's 183:13 189:19
matrix 156:10	mentioned 96:25 97:24 99:25 111:19 112:22 115:7 143:12 147:25 149:19,22 153:8 188:22 191:17 198:4	minute 112:5 147:6 182:3 184:12 188:13 189:16 195:14 196:1	Motion 70:18
Matt 82:11	mentioning 163:19 185:21	minutes 74:18 75:20 76:21 77:6,16,23 78:14 79:2,12,22 81:10 94:23 134:8 199:14 200:9,17 205:17 206:18 208:18 209:14 213:18,22	motions 52:12,14,22
matter 85:18 106:22 119:22	mentions 142:2 208:1	misalign 113:22	motivated 186:11
matters 51:17 84:13 85:16 100:20 166:20	met 131:6	misaligned 92:13	mouthful 123:22
Matthew 57:8	method 132:12 165:20	misalignment 92:3 93:9,16 110:13 112:12, 19 114:25 138:14 139:18	move 54:6 107:8 137:17 138:3 139:15 176:4 180:23 182:21 184:4 188:5 190:3 194:6 202:2 211:11
meaning 129:14 170:13 179:25 205:4	methods 147:11	mishandling 117:17	moved 90:19 169:5 193:23
means 92:11 110:21 123:18 147:11 191:14 203:5 210:13	microphone 87:12	misinterpreting 185:24	movement 143:20 150:15
meant 107:17 149:4 199:10	mid-2018 128:18 158:4	missed 82:10 189:5	moving 115:16 150:14 190:12,25
measures 138:25 142:12	mid-may 204:22	mistake 159:17	Moving 153:24 154:7,20
mechanism 157:14 161:17	middle 182:1 195:12 200:11	misunderstanding 185:18	multiple 153:22
medical 117:22	Mile 90:4	Mitchell 55:14	mute 87:15
meet 52:17 53:18 121:14,18 130:12 131:23 133:14 144:6 158:22	milestone 150:13 151:4	Modeling 66:15,20	<hr/> N <hr/>
meeting 71:21 72:1,6, 11,16,21 73:1,6,16 74:6,11,19 75:3,8,20 76:1,3,12,17,22 77:2,7, 16,19,24 78:5,10,15,23 79:3,13,18,23 80:3,13, 21 81:11 170:6 171:9 180:14 181:16 182:7	milestones 208:23	modifications 112:22	name's 87:9,16
	million 128:2,3,4,5,12, 13,14,15,23 130:23 131:22 158:3	modified 88:14	named 167:13 181:22
	mind 108:6 139:15 141:17 142:16 150:25 157:18 163:23 187:23	moment 51:25 52:2 86:22 91:14 120:5 127:12 137:22,23 141:18 145:7 181:17	names 140:20
		moments 209:17	narrative 154:6
		Monday 98:20 101:5	nature 88:20 100:24
		money 149:24 157:8 160:8 161:10 162:22 163:24 164:2 165:25 166:5	Navy 90:2 116:9,10 117:11,12,19
			Navy's 116:16

NCR 207:25	NQNDTS 129:12 130:3, 8 131:14 162:13	152:10 159:7 163:25 164:5 167:21 172:19 177:16 182:13 184:19 189:22 198:11	on-site 146:19
NDA 85:4	NRC 71:11,15 73:21 74:1 79:7 93:22 98:18, 20,25 99:4,8,9,16,19,22 100:9,12 101:1,5,8,16, 24 102:2,4,6,13,17 103:12,17 112:18 131:24 155:13 156:9 178:13 181:23 183:3, 18,25 185:14,21,22 187:7 189:12 190:8,9, 25 191:4,8,14,21,23 192:19 194:13,23 195:8 198:20 204:22,23 205:22 207:25 208:6, 14,24 209:22 212:20, 21,24 213:3,6,9,10,11	objection 171:13 173:11 176:4 183:16 185:2 186:19,25 190:1 191:21 196:9	onboard 116:22,25
NDAS 84:20,23	NRC's 114:2 183:15 184:9 189:15 194:15 198:19	objections 134:17 175:15 176:13	one-hour 51:18
NDCTP 59:24 60:4,8, 12,14,19 61:1,5,21 62:1,6,17,22 63:1,23 64:4,15,20 65:5 90:25 173:18,19	NRC-ISSUED 155:5	objective 164:18	one-unit 212:14
NDTS 159:4 161:6	nuclear 51:9 56:12 61:11 67:1 90:3,11 98:12,17 103:14 108:7 110:9 115:14,16,17,23 116:1,2,9,16,18,22,25 117:6,8,12,14,15,17,19, 24 118:20 121:10,11, 13,20,22,23 122:7,8 123:6 129:15 130:15, 16,19 132:1 133:2,6,8, 17 137:12 142:20 144:1,3,5 145:24 146:8, 21 147:21 160:22 168:21 169:1,4 170:2, 19 177:7 179:18 180:3 183:25 194:5,15 200:1 203:5 210:16,20	objects 193:5	ongoing 52:24 97:21 111:24 149:21 180:10
needed 142:23 143:2 148:15 151:25 162:19 169:18 198:20 205:2 210:3	Network 57:9	obligated 121:10	Onofre 90:18,22 93:24 101:6 115:19 121:11 140:6 145:24 155:14 157:12 164:21 170:16 171:3 180:7 199:20 210:20 213:15
net 126:15 129:11,17, 20 130:7 131:13	newly 162:13	obligation 121:15,18, 20 122:3,10 130:12 133:14 158:23	onsite 185:22,23
Nina 57:22,25 59:9 167:6	note 55:14 84:22 197:8	obligations 131:24 133:5	opened 156:22,23
nix 168:5	noted 178:1	observation 154:17	operate 147:14 183:7
non-qualified 129:15 130:15 133:8,12 157:11,15 160:10,14 161:15,18 162:20,23 163:7,13,22 164:17,23 165:3,4,13 166:6,10	notes 99:12	observations 146:3 154:16	operating 99:18 143:1 156:9
normal 108:19 116:4	notice 81:20 102:2,4	observing 191:5	operation 99:9 100:12, 18 116:5 142:8 150:23 169:11 185:19 212:14
Norton 80:20	notification 155:11 185:15 195:10	obtained 103:16 190:25	operational 90:19 100:19 111:24 148:24 150:22 181:3
note 55:14 84:22 197:8	notified 94:18 97:4 98:17	occasion 168:17	operations 97:5,9,10, 13,16,21,24 98:2,22 100:4 102:22 110:6,16 117:6 138:22,23 139:3 141:13 142:24 143:13, 17 147:23 148:3,5,17, 21 153:17 155:6 180:21 186:1 187:19,22 191:11,15 192:1 194:19,23 195:2 197:10 198:16 199:1 202:8 206:11 208:10 211:5,9, 11,12,18,25 212:1,13
noted 178:1	notified 94:18 97:4 98:17	occur 102:18,21 131:1	operator 183:7
notes 99:12	notify 189:2	occurred 93:16 99:24 101:2,7,13 112:19 115:9 155:22 187:5,15	operators 151:23
notice 81:20 102:2,4	noting 208:24	occurs 116:3 119:10	opinion 88:23
notification 155:11 185:15 195:10	November 79:7 90:18, 21,22 93:24 101:8,9 169:6 179:16,20 180:8 181:1	October 79:22 146:18 170:25 171:9	opportunity 55:2,3,20 56:6,22 87:19 186:9 187:12 189:5 211:24
notified 94:18 97:4 98:17	numeral 126:21	off-center 101:12	opposite 178:12
notify 189:2	numerous 123:7	off-site 122:16	Optimal 107:14
noting 208:24	number 104:1,24 128:2,17,21 167:16 169:14 171:12,25 172:4 190:12	offers 181:25	optimum 114:4
November 79:7 90:18, 21,22 93:24 101:8,9 169:6 179:16,20 180:8 181:1	numbers 106:18 107:4	Office 56:20 89:13	
NQNDT 129:14	Numeral 126:21	officer 51:12 90:11,21 168:21 169:1,4 170:2, 19 179:18 180:3 181:10 203:5 210:24	
	numerous 123:7	official 146:21	
	O	omission 167:13	
	object 141:7 146:14	omit 134:13	

order 51:5 54:23 58:14 81:25 138:10 169:18 192:4 196:7 197:6	packet 161:23	participating 85:13	142:4 152:9 183:5 192:21 206:4,7 209:10, 12 210:2 211:10
orders 200:21 201:2,5	pad 97:1 147:12	parties 52:11,17,18 53:4,5,18 54:3,6 82:7 83:23 84:13 85:1 135:11	performed 95:15 115:11 191:3
organization 140:12, 24 141:24 142:1,7,14 143:11,18 144:6 150:6 154:10	pages 71:20,25 72:5, 10,15,20,25 73:5,15,20, 25 74:5,10 75:19 76:21 77:6,15,23 79:2 141:17 177:5 182:2 186:7 195:13 208:18	parties' 53:24	performing 192:24 193:2
organizational 140:22 141:8 144:11	paid 150:12 162:20	partner 58:5	performs 137:14
organizationally 140:16	Palisades 178:1	parts 144:21	period 92:15 119:7 125:19 127:9 128:7,18 131:6,11 149:2 158:3 196:16 198:22 207:4
organizations 142:25 150:2	Palmisano 169:22 170:1 179:21 180:8,22 181:22,25 182:15 184:10 185:5,13,20 186:7,21 188:9,17 193:17	party 52:1 54:25 135:16 167:15	periodic 140:5
original 103:10 138:19 149:8 212:3,4	Palmisano's 182:10 184:16 186:18 187:4 188:16 193:25	passage 182:15	permanent 129:8
originally 83:17 212:6	Palo 62:22	passed 122:8	permanently 123:5
outline 53:16,19,20 54:1,4	panel 169:21 170:1 181:16 182:7 183:2 184:2,7 186:6 187:9 188:8 189:11 190:6 191:2 192:16 193:16 195:23 197:23 198:16	patent 103:17	permit 169:19 170:11, 21,24 172:3 175:24
outlined 115:12	panel's 190:7	patents 103:21	permitting 147:13
outreach 204:19	paperwork 144:20	path 160:8	person 172:20
overlap 180:5	paragraph 120:24 121:4,6 143:11 200:11	pause 150:15	personal 98:12 108:7
overrule 185:1 186:25	paramount 116:2	pay 150:6 161:17 200:9	personally 93:8,15 106:3
oversee 140:13,25	pardon 95:6 105:2 113:1	paying 165:12	personnel 101:21 112:23 118:12 140:25 142:24 148:3,24 149:25 150:1,3 187:19 199:24
overseeing 143:12	Parker 56:18,19,24 57:4 84:15,18 85:6,11, 15 89:9,11,12,16 91:16, 18 93:12 105:23 108:12,21 120:12,14,15 124:1,4 125:8 131:15 133:18 134:2,15,17 135:6 157:22	payment 153:15	perspective 144:22 189:7
oversight 65:14 112:15 113:21,25 114:7 115:1 137:11 140:2,5, 10,11,12,14,18,24 141:3 142:1,7 143:11, 18 144:1,3,5,9,22 145:24 146:8,21 147:1 154:10 155:6 188:12 191:6 206:4,6,10 209:10,12 210:2	part 91:4,7 100:2,14 108:13 126:8,12 140:12,15,17 142:11 144:8,17 161:13 164:5 194:2 211:16 212:12	payments 149:7 150:13 151:5	phase 140:8 142:3
overview 200:12	partial 107:16	PDF 56:25	photograph 96:8
owner 183:7		Peattie 75:24,25 76:2, 11 202:23 204:3	phrase 104:18 107:14
Oyster 177:10 178:1		peers 82:25	phrases 198:17
<hr/> P <hr/>		pellets 95:3	physical 208:5
p.m. 51:21 134:23,24 135:1		penalties 150:22	physician 117:21
package 141:2		penalty 102:3,9,11	picky 191:13 192:8
		pending 110:8 128:16, 20 132:10 133:9 158:6	picture 94:1
		people 149:24 197:12, 17	piece 180:12
		Perez 149:11 151:17 152:2,13,22 159:10 162:4 173:14 174:21	place 51:6 102:24 116:6 118:21 138:25 142:12 143:21 148:20, 25 180:11 191:6 196:7 197:6,14 203:19 206:20 207:4
		Perez's 159:8	
		perfect 188:19 189:4	
		perform 96:3 101:6 104:13 133:5 153:6 203:19	
		performance 136:24	

placing 132:5	possibility 138:20	200:12 201:11 202:5,22 204:3 206:24 210:8,14	proceeded 115:10 167:20
plan 82:19 163:1 167:15 172:6 173:6 193:20 198:1 206:20 212:3,5	postulate 150:21,24	presentations 198:24	proceeding 51:1,10, 12,13 52:25 55:15 83:4 85:3 89:4 136:5 164:2,5 171:15,23
planned 212:7	postulating 118:19	presented 126:6 209:22	proceedings 126:10 163:14
planning 168:4	potential 96:4 102:25 111:14 117:16 118:3 119:5 147:21,25 204:9	presenting 174:22	proceeds 63:24 65:15 66:25 120:4,19 124:16, 21 125:9,11,18,19 126:4,11,15,21 127:8 128:7,10,17 129:17,20 130:2,8 131:7,13 157:9, 11 159:3 160:9 163:3 164:23 165:2,10,13
plant 90:3,16 117:6,8, 12 118:17 142:22 152:4 155:16 177:21 200:1	potentially 114:25 133:1 156:20,24 164:8 165:8,10 194:4	preserved 208:6	process 91:7 94:22 115:20 117:15 129:21, 22 130:20 131:25 140:6,12 147:1 162:21, 24 163:2,5,8,10 170:15 171:1,2 178:16,19 180:9,16,22 187:5 191:24,25 206:10 208:3,11,15 209:23 210:21 211:16 213:13
plants 90:3 121:13 123:6 133:17 156:9 177:14	power 90:3 116:9,16,18 117:8,12,15,20 123:6 133:16 177:14,21	presume 210:13	processes 111:7 156:9 180:11 191:17,23 197:14
plenty 196:6 197:5	Powerpoint 201:11 202:4,22 204:2 206:23 210:8	presumptive 155:20	procurement 90:20 181:10
point 90:4 93:5 96:17 102:19 103:23 104:23 107:23 108:2 115:11 125:17 130:24 134:14 139:13 141:8 144:4 148:20 152:18 154:1 155:24 160:12 163:2 176:2 177:10 178:1 181:9 185:16,17 188:19,20 207:16	practice 108:19 129:24 146:6	pretty 94:1 176:23	produced 145:23
pointed 152:12 174:7	practicing 109:2	prevent 94:3 97:18 98:10 102:24 116:6 118:12 139:1 147:25	produces 118:10
Policy 60:4,8 121:21 122:4,7,8 158:23	Pre-decisional 71:10	prevented 103:2 115:7	product 96:21 103:8,10 167:19
pool 97:22 110:11,15 151:22 160:24	pre-enforcement 102:6	previous 126:10	professional 108:23 117:5 156:17
pools 115:18 142:21,22 148:23 151:21 211:13	preceded 170:1	previously 99:25 114:24 118:4 139:21 154:2 155:13 179:13	program 116:9,16,18 144:7,19,21,23,24 146:12 154:19 188:12 201:1
portion 82:21 100:3 120:25 149:12 167:22 174:11 184:20 189:21 209:16	preceding 101:7 131:18	price 181:5	programs 151:24 200:20
portions 88:12 89:1 108:19 195:13	precisely 179:13	primary 183:14	progress 124:11
pose 118:15	predecessor 169:21 179:22,23	prior 64:5 65:16 90:13 114:8 129:23 146:8 155:24 169:9,10,12 170:2 177:5 181:1,2 187:8,25 190:25 200:15 205:7 206:17 207:17,24	project 69:23 86:18 142:18,20 151:4 153:13,14 164:15,20 173:20 188:20 194:9 196:16,25
posed 109:24 115:14 117:13,24	preferences 55:4	private 165:20	
position 107:24 108:4 118:6 152:7,20 163:16 168:21 169:10 170:2,16 181:2 196:14	preferred 55:2,13 57:16 86:23 87:7,17	probability 115:6 164:9	
positions 90:7,13,19 138:8 140:19 180:1	preliminary 89:20	problem 83:23	
	preparation 148:4	procedural 148:5	
	preparations 110:11	procedure 94:19 97:2 112:23 141:2 150:1 188:24 189:1	
	prepare 83:1	procedures 98:9 111:7 112:1 143:15 147:24 148:6 186:16 190:22 198:23 212:17	
	prepared 58:23 84:11 88:17 139:2,5,7,10 162:4	proceed 84:14 88:2 133:11 135:20 145:17 159:14 176:25 179:7	
	preparing 99:15		
	present 131:22 158:19 170:5 182:6		
	presentation 74:23 75:2,7,25 76:2,11,16 77:1,18 78:4,9,22 79:17 80:2,12,20 199:14		

projecting 202:15	prudently 108:1,2	qualifies 156:17	radioactive 119:14
projects 203:8 205:10	public 56:19,20 57:13, 15 58:1 59:8,12,17 62:2,7 64:9,21 67:18 71:16 73:21 74:1 84:24 85:2 89:12,13 119:14 157:1 161:21 167:3,7,9, 24 168:3 173:8 174:6 178:25 180:14 187:11 199:6 204:14,18,23 207:25 212:22,25 213:10,22	quality 114:7 144:7,13, 19 148:20	raising 206:16
prolonged 195:1	publicly 198:20	quarter 180:14	Randy 80:2
promoted 90:17 168:20 169:4	pull 119:24 151:7	question 68:7,11,15, 20,24 69:1,5,8,18 70:9 93:14 94:25 95:1 102:13,15 103:12 108:21,22 109:17,18, 20,24 113:6,13,16 115:25 118:23 119:9 124:19 125:22 129:16 131:17 139:4,16 141:23 145:4,14,20 150:5 152:11,17,24 156:5 159:20 160:15,17 161:24 162:2,8 164:4 166:8 169:24 170:9 171:18 172:21 175:1 176:23 178:23 186:24 193:8 197:1	Rate 129:22
promotion 169:6,10	pump 111:2,3,4,5,8,9	questioning 91:19 167:9 174:4 179:1	rates 119:19
prompt 185:15	pure 181:8	questions 54:6,14,22 68:3 69:6,17 70:4,13 89:20 116:13 133:20 134:1,6,11 135:7,9,12, 14 153:2 166:12 167:2 168:3,5,8,11 174:14 175:11,17 176:5,15,22 179:5 186:23 213:18, 19,22	rational 165:22 177:25 178:2,3,4 204:21 207:16
prompted 172:13	purportedly 186:21	queued 70:24	re-forward 83:16
pronoun 55:2 86:23 87:7	purpose 88:11 136:17 140:4 160:4 167:22 172:11 199:22,25 204:16,17 210:19	quick 125:22 143:6 203:13	re-rig 94:20
pronounced 86:4 123:23	purposes 169:25	quote 90:25 106:1,4 183:4 186:8 190:10,19 192:22 193:6,20 194:16 196:6,7 197:5,6,24 198:9 200:17 201:18 205:21 206:4 208:21 209:2 211:5	re-supported 92:23
pronouns 55:13 57:10, 16 87:17	pursuing 125:4	quoted 94:11	reach 192:25
proper 143:16 211:10	pushed 208:10	quoting 190:16 211:4	read 55:18 56:6,14 57:17 58:2 82:15 91:24 92:6 94:10,11 101:24 105:4,15,17,20,25 106:1,7,15,19 107:13 109:7,14,17,18,21 113:10,13 114:16 121:5 122:6 123:1 126:2 127:23,24 142:16 143:5,14 159:22 160:3 182:3 184:13 187:3 188:13 189:16,17 195:14 196:2
properly 107:21 142:5 193:21	put 52:17 53:19 54:10 55:8 83:20 100:1 102:23 138:25 203:14 206:19,20	radiation 118:11,15,25 119:14,17	reading 108:9,19 113:18
proposal 133:12 157:7, 10 159:3,25 160:21 163:4,9 164:6 206:13	puts 130:13		ready 97:23 152:5 179:4 180:22 197:9 198:3 203:16 204:21 211:25
proposed 81:20 102:3, 8,10 160:16 200:20	putting 142:11		realization 187:16
proposes 129:11	PW-01 59:10		realize 144:10
proposing 160:17 161:10 162:21 164:22 165:21	PW-02 59:14		realized 187:24,25
proprietary 103:6	PW-03 59:17,19		reason 150:17 153:15 165:3 171:18 174:25 197:16 199:2 201:6 207:15 210:4
protect 123:11 130:4,9	PW-1 59:7		reasonable 104:14,18 107:9,19 108:16 109:10 114:3,10,13,17,20
protected 152:1	PW-2 59:12		reasonableness 59:24 61:11 65:20 66:1 67:1,3 105:8 136:13,18 137:13 138:9 147:5
protection 100:16 155:7			reasons 150:16 180:19
protocol 99:18			
protocols 117:18			
provide 52:20 130:8,18 153:11 205:8			
provided 83:23 89:21 114:7 168:8 200:12			
providing 140:4 169:15			
prudence 107:24			
prudent 108:6 139:17			

reassess 116:5	12 182:9 184:15 189:18 201:22,23,24	reframe 108:22 124:19	remaining 151:4
reassigned 90:22		refund 128:1 132:15 133:7 160:9	remains 161:21
rebuttal 64:9,15,20,25 65:5 66:25 90:25 94:9 136:11 137:17 138:4 147:4,7 149:12 153:19 155:2 156:2 158:24 161:3 164:10 190:23	Recorded 60:13,15,20 61:6,22	refunded 166:5	remarks 181:24 198:14
recall 98:16,24 102:8 106:22,25 184:1 198:14,15	records 107:22	refunding 166:10	remedies 150:18
receive 82:23 83:17 84:21 85:1,3 121:22 122:16 124:16 128:6 151:4 158:11 169:5	recover 149:14 150:9 152:8	refunds 127:18,21	remedy 147:23
received 53:6 56:25 82:5 126:5 129:17 146:18,19	recovering 123:13	refused 175:19	remember 109:21 181:11 198:17 211:21
receiving 85:9 146:14	recovery 126:9,14 129:22 131:2 208:23	regain 94:19 97:6	removal 121:24 132:11
recess 86:14 134:23 135:5 166:21 167:1	recross 133:24 134:1,3 135:11	regard 84:19 98:13,15 101:17 106:21 108:14 174:18	remove 121:10,22 122:11 133:1
recollect 183:23 201:6	recurrence 94:3 97:19 98:10 102:24 116:7	regimented 191:24	removed 122:3 130:4 164:20
recollection 99:14 101:8 102:10 155:16 169:7	recurring 148:1	Region 98:20 102:6 181:23 183:3,25 189:12 190:8 194:16,17	repeat 59:22 60:13,24 63:6 75:25
recommendation 146:13	red 167:17	regional 183:24	repetitive 204:25
recommendations 146:6,10,23 175:2,4,19	redirect 133:23 134:1, 3,6,10,13 135:10,15	regularly 108:13,17	rephrase 114:18 132:25
recommended 200:15	reduce 168:6	regulated 85:2	replaced 111:4,9 193:24
reconcile 191:1	reduction 143:3	regulation 178:15	reply 146:20,21
record 51:5 52:1 54:16 58:18,19,20 59:22 61:1, 17 70:23 71:1,2,3,4 73:9,11,12 74:14,15,16 76:6,8,9 77:11,12,13 78:18,19,20 80:16,17, 18 86:13,15 89:22 90:12 92:1 105:6 107:13 109:14 113:10, 11,14 120:2,9,10,11,16, 17,25 121:6 122:7 123:2,17 125:3,6 126:2 127:13,14,15 135:4 137:23,24,25 138:1 141:19,20,21 145:8,9, 10 159:23 160:3 166:15,17,18,19,23,24, 25 172:22 176:6,10,11,	redundancy 168:6	regulations 99:4 100:2,3,5 144:8,17 191:8	report 93:22,23 98:25 99:8,13,16,17,20,22 100:13,14,18,22,25 101:1,9,12,23,24 138:19 139:2,5,6,10,12 145:5,23 146:4,5,12,13, 18,20 154:9,16,18 171:10 174:19 175:6, 20,21 185:19,25 186:1 187:7 192:12
	redundant 100:16 155:7	regulator 131:24	reportability 187:6
	refer 137:21 140:21 142:15 145:3	Regulatory 66:16,21 98:17 110:9 183:25	reportable 186:11
	reference 143:25 153:21 154:1 158:3 161:4	relate 135:24 140:9	reported 100:9,15 180:7
	referenced 93:9 96:7 126:20 149:11 154:7 199:10	related 149:21 157:8 160:19 173:16 209:13	reporter 74:24 105:16 108:10 143:7 172:17 173:25
	referencing 144:2	relates 140:1 141:12	reporters 87:13
	referred 101:17 124:25 144:2,9	relationship 152:21	reporting 181:24 183:10,15 185:12
	referring 92:4 96:19 104:23 111:10,21 124:15 139:12 157:25 159:25 171:1,4 173:13 186:1 187:5	relaying 187:25	reports 94:5 138:17 154:7
	refers 139:24	relevance 159:9 163:8, 10 171:21 174:19 175:13,14,18	repository 122:13 123:5 129:8
	reflect 198:9	relevant 114:3,12 141:13 171:15,22 195:13	
	reflected 146:3	relied 103:19	
	Reform 57:9	relitigated 164:7	
		relocated 169:4	
		remained 142:20 151:21	

represent 88:23 158:19	responses 68:2,19,25 69:6 70:4,13 85:25 136:3	retraining 148:4	Roman 126:21
representation 115:3	responsibilities 169:15 179:14 180:15	return 134:21 164:19 200:22	room 151:23
representative 168:4	Responsibility 56:13	returned 129:18,21 131:14 170:16	root 93:21 200:13
representing 54:25 56:12 57:8,15 89:12	responsibility's 183:6	reveal 208:13	roughly 96:1 132:2
represents 96:13	responsible 136:24 137:1,4,6 179:16 181:3, 9 192:20,23 193:6	reversed 165:24	round 124:11 126:4 127:4 128:1,3,4,5,11, 13,14,15,17,21 133:23 135:10,11 158:13
reputation 150:25	restart 97:23 148:5,21 149:1 150:4 152:5 159:5 162:11 187:19 188:3 197:9,16 198:6, 17,19 202:12,15 203:1, 15 204:6,15 207:2,13 211:6,8,16 212:7,8,13, 22 213:7	review 55:20 56:22 87:20 94:5 100:5,7 110:8 133:10 136:13 138:18 160:25 165:15 167:11 172:6 181:8 208:25	rounds 124:10 158:18
request 68:3,7,11,15, 19,24,25 69:5,6,8,17 70:4,9,13 71:6 80:7,25 81:25 132:14 145:13 154:6 161:24,25 201:18 206:13	restarted 197:15 198:25	reviewed 57:9 93:19 154:12 208:22	routine 196:22
requesting 123:9	restarting 98:14 142:11 154:23 180:21 197:11	reviewing 181:9 209:23	rows 127:6
requests 85:25 136:4	restate 159:20	reviews 91:6 114:2 136:18 140:5 141:2 144:20 153:22 198:4	rule 84:23
require 114:4 131:13 165:1	resting 95:12	revised 53:13,14 69:23	rules 165:7 166:1
required 144:18,23 155:11 172:5 175:7 178:14 199:23 200:18	restore 108:3	reward 128:24	ruling 165:1,5,20
requirement 55:3 86:24 100:23 167:16 185:12	restrain 118:6	RFP 206:5 209:10	run 130:24 169:23 178:19 196:16
requirements 110:17 190:22	result 92:14 142:21 156:24 207:22 208:8	rigging 92:17,24 94:15, 17,18 100:16 102:25 111:15 118:5	runs 181:25 190:13 191:5 198:22
requires 122:4,12	resulted 155:9	right-hand 201:17 202:11,25 204:6 207:2 210:12 212:20	Ryan 55:12 85:19
reserve 159:10	resulting 112:13 149:15	ring 92:15,16,20 94:12, 16 95:7,12,13,16,20 96:9,13,18 118:5 138:21 207:21	<hr/> S <hr/>
reserved 85:20 136:2	results 123:4 178:16	rings 96:16	safe 108:4 110:14 117:10,18 152:4 205:2
resolution 158:11 213:4	resume 97:10 166:21 204:21 205:10 207:12 208:23 209:1	risk 119:5	safely 92:24 94:21 96:22 97:7,22 110:2 119:20 130:19,25 131:3,23 132:13 143:15 149:20 154:23 178:11 187:19 188:3
resolved 191:10	resumed 110:16	Riverside 199:21	safety 98:12,13,16 108:7 115:23 116:1 156:25 187:23 194:16 199:5 208:1,8 213:12
Resource 126:9,13	resumes 203:9	Robert 55:8 67:8,12,17, 22	sampling 144:21
respect 127:7 131:10 148:8 152:20 209:18,25	resuming 200:16 202:7 210:10	robotic 209:20	San 51:8 90:17,22 93:23 101:6 115:19 121:11 140:5 145:23 155:14 157:12 164:20 170:16 171:3 180:7 199:19,20 206:15,18 209:13 210:20 213:15
respond 146:10	resumption 195:9 205:20	Rod 74:23 75:2,7 200:12 201:11 202:5	satisfied 194:24 209:2
responding 186:21	retained 107:22	rods 117:14	satisfying 213:8
responds 146:20	retaining 148:19	role 65:14 90:9 99:15 121:1	
response 54:15 58:12 68:7,11,15,19,24 69:5, 7,17 70:9 71:6 80:7,25 113:6,14 145:13 154:6 161:23 162:8 195:12			

save 134:9 135:12	173:14	SDGE-03 66:6,8	199:1 201:20 210:21
SCE 60:4,8,12,14,18,25 61:4,16,20,25 62:5,11, 17,21,25 63:8,13,18,23 64:4,20 65:5 68:2,7,10, 15,18,19,24,25 69:4,5, 7,12,17 70:9,13 71:11 80:7,25 81:15,20 84:8 85:19,25 89:1 90:14,15 97:14,15 98:17,19,25 99:21 102:15,17,20 103:5,7,18 110:7,18 111:21 113:21 114:11, 15,19 115:8 124:9,13, 20 125:4 126:5 127:17, 25 128:6 129:1,11,18 130:9 131:8,14 145:12, 13 162:12 173:17 198:4 200:20 203:2 204:7 205:4 206:4 207:3,7 209:1,9 211:4	SCE-09C 64:24 65:2,4, 7	SDGE-03-C 66:10,12	Settlement 70:18
SCE-1 88:12	SCE-10 65:9,11	SDGE-04 66:14,17	severalfold 199:22
SCE-11 71:5,7 85:24	SCE-A4NR-001 71:6	SDGE-04-A 66:19,22	severity 155:7,9,12,25 156:12,13,14
SCE/SDGE 59:23	SCE/SDGE-01 59:21, 23 60:1	SDGE-05 66:24 67:5	share 124:21 128:6,9 129:20 148:9 157:11
scenario 118:19 137:9 212:7	scheduled 113:23 121:25	sealed 119:12	shared 148:12 149:5
schedule 51:17,22,23 86:2 112:13 113:19 115:11 122:4 142:5 143:16 147:19 149:15 166:16	school 108:24	section 84:24 121:8 136:15 143:10 144:1,2 157:7 159:12,14 186:22	shareholders 126:16
SCE's 70:4 96:21 97:8 105:2 114:1 128:9 129:20,21 138:9 159:24 200:14	scope 142:4 143:16 152:11 159:8 166:1 167:10 171:14,23 177:1,17	security 100:20 148:24 151:20	sharing 200:1
SCE-01 60:3,5,7,9	Scratch 109:11 125:6	seek 149:14 150:9,17 152:8 153:9,15 158:14	shield 92:15,16,20 94:12,16 95:7,11,16,20 96:8,9,12,16,18 118:4 138:21 207:21
SCE-02 60:11,16 162:1	scratches 174:18 175:12	seeking 151:6,10 162:22	shielding 118:12
SCE-03 60:18,21,23,25 61:2,4,7 141:9,17 142:2,15 143:25	scratch 109:11 125:6	selected 165:4	shorten 136:2
SCE-03C 61:9,10,13, 15,18,20,23	scratching 189:15 213:6	send 53:14 83:3,5,10 191:14 192:3	shortly 205:11
SCE-04 61:25 62:3,5,8	screen 52:4 55:8,9,20, 24 56:7,23 58:5,7 87:1, 21	senior 207:3,7	show 99:12
SCE-04C 62:10,11,14, 16,19	scroll 113:5 122:22 124:5 129:4	sense 144:25	showing 165:6
SCE-05 62:21,23	scrolled 126:22	sentence 105:5 107:8, 13,16,17 121:5 122:2 162:9	shown 55:7 91:4
SCE-06 62:25 63:3,5,8, 10,12,15,17,20	SDG&E 51:9 56:2,4 65:21 66:2 82:14 145:12 172:19 173:17	separate 83:17	shows 95:11 104:2 177:7,9 202:14
SCE-07 63:22 64:1 89:22 119:25 120:18 122:19 124:6 125:20 157:19	SDG&E's 65:14	separately 192:25	shutdown 156:11
SCE-08 64:3,6	SDGE-01 65:13,17	September 59:18 79:12,17 99:2,9,13,22 187:8	side 92:20 126:25 144:14
SCE-09 64:8,10,12,14, 17,19,22 91:1,5,6,10, 15,22,25 94:9 95:6,10 96:20 104:2,5 113:3 114:17 136:12 147:4,25 157:5 158:25 159:14	SDGE-02 65:19,23	serve 54:4 82:20 83:25 116:11,25 136:21	sign 84:23
	SDGE-02-C 65:25 66:4	served 52:11 53:8,10 82:14 116:8,22	signed 84:20 181:6
		service 54:4 82:22 83:10,15 85:9	significant 155:19
		Services 90:20 169:12 181:3	signifies 156:6
		session 54:20 85:13,14 135:1 205:14 206:3 209:9 210:3,5 213:25	simple 131:17 169:20 176:23 197:16
		sessions 202:19	simply 100:13 102:24 146:12 168:11 180:22 211:16 212:12
		set 55:23 57:2 70:24 73:10 76:7 87:1,20,23 143:9 144:6 161:24,25 180:15 197:18 198:17	single 154:22
			single-unit 211:5,9
			sink 188:1
			sir 89:20 90:8,23 91:9, 13 93:3,14 94:8,24 96:7 97:8 102:13 103:4 104:4,16,19,24 106:15 107:6,11 109:5,9,12,18

110:18 111:18 112:6 113:17 117:3,7,9 118:23 119:21 120:7, 20,22 121:16 122:25 123:15 127:5,12,24 129:3,25	sit 197:25	site 90:17 93:16 152:1 185:17 195:2	sites 123:11	situation 92:22 100:1 111:15 133:7 137:10 138:25 153:12	skills 180:20	skip 202:18 205:13	slack 118:6	slow 105:15	slower 211:23 212:15	slowly 108:9 109:21	solely 114:1	solicited 206:12	solid 117:5 206:10	solidly-funded 178:10	SONG 131:11 132:5 194:13	SONGS 60:12,14,19 61:1,5,11,16,21 62:1,6, 12,17,18 65:15,20 66:1, 7,11 67:1,3,4 69:13,22 90:16 98:2 121:12 122:16 129:12 130:2,4, 9 131:6 147:6 157:16 161:7 164:15 177:8,14 179:17 180:2,15,25 192:24 195:9 199:14, 17,19 200:10 205:18 206:6,25 209:11 210:25 212:22	sort 104:2 108:19 112:19 161:2 182:18 191:23	sorts 155:22	sought 153:5	sounded 168:23	sounds 135:20 167:23	Southern 51:7 55:12 87:4 88:6 90:5 130:13 136:3 168:19 170:10 172:1 173:4 185:18 190:11 193:3 194:18,25 199:11 207:9 210:18 211:1	speak 87:12 199:8	speaker 87:11 182:15, 17 183:17 189:24 196:10 198:12	speaking 182:20 183:21	special 101:1,6,9,11,24 162:21 165:1 167:16 171:12,22,25 172:4 185:16	specialty 153:23	specific 88:12 112:2 139:12 141:14 152:13 167:12 174:17 175:11	specifically 85:1 137:18 144:6 147:9 161:22 162:5 174:14	spectrum 114:10	spend 162:22	spending 149:24	spent 92:9,11 96:14 97:22 110:15 115:17,18 117:14 121:10,22 122:11,16 123:6,11,13, 21 124:16 129:8 130:4, 9,18 131:6,11 132:5 133:6 142:20,21 147:12 148:23 151:20,21,22 159:4 160:5,20,24 161:8,11 162:14 187:9 211:13	spent-fuel 110:11	sponsor 120:25 159:13	sponsored 141:10 174:13,15,17 177:17	sponsoring 88:2,16, 19,22 141:14 152:22 159:12 174:11	spot 104:8	spreadsheet 84:5	staff 54:20 85:9 99:20, 25 114:8 115:21 147:14 151:20 171:10 196:8 197:7	staffing 186:15	stakeholders 204:20	stand 52:5 53:13 86:17 197:13 198:22	standard 99:18,20 104:12,19 107:10,20 108:16,18,20 109:10 114:3,13,17,20 136:13, 16 137:13 158:16	standpoint 101:13 181:8	stands 126:6 210:16	start 55:10 112:20 121:25 132:4 133:1 136:11 191:10,15 192:1 198:5 211:9,15,23 212:11,14,15	started 112:25 155:23 168:18 169:1 170:15 171:2 190:11 191:19 208:3 210:22 211:20 212:6	starting 91:18 105:4 109:16 113:15 123:3 125:18 126:3 128:1,11 136:12 138:4 142:16 143:9 155:4 159:24 164:13 182:15 185:5,10 187:22	starts 105:5,7 107:8,9, 14,17 185:9	state 52:1 81:15 109:3 123:17 132:9 138:7 147:9 159:2 164:13 169:17 170:4,6 178:7	stated 94:10 104:15 115:3,4 180:8 198:20	statement 102:19 114:15,19 168:2 174:2 185:4,6 187:12,20 191:1 212:22	statements 52:2 168:11 187:2,13 193:10 199:2 213:10	states 90:2 104:11 109:3 121:13 162:9 178:15 193:19	stating 121:24 139:6	station 111:1 121:11 132:9 140:13,17 143:22 145:24 151:23 178:12 194:5 210:20	stations 103:14 121:23	statistical 209:21	status 158:6,7 202:7 208:22 210:10	statutorily 84:25	stay 134:19 153:14	stayed 194:9	Stetson 190:7,10,15	stipulate 52:18 85:24	stipulated 52:19,21	stop 116:4 197:15	stopped 102:21 115:11 150:15	storage 92:12 93:12 96:13,15 100:3 101:17 102:14 103:24 115:17, 18,19 118:21,25 119:20 122:7,16 123:13,21 124:17 132:6 159:4 160:6,12,20,24 161:8, 11,17 194:7	store 123:5,10 130:3,9, 25 131:3,23 132:10,13	stored 96:5 97:23 104:3 118:10 130:19	storing 131:5,11 143:19	strategy 160:16	strength 196:6 197:6	Strickland 195:23 196:5,10,11,13,15,21, 23 197:5,17	strong 95:14 118:11 149:19 151:3	strongly 148:14	structure 141:4,24
--	-------------------	---	---------------------	--	----------------------	---------------------------	--------------------	--------------------	-----------------------------	----------------------------	---------------------	-------------------------	---------------------------	------------------------------	------------------------------------	---	---	---------------------	---------------------	-----------------------	-----------------------------	--	--------------------------	---	----------------------------------	---	-------------------------	---	---	------------------------	---------------------	------------------------	--	--------------------------	------------------------------	--	--	-------------------	-------------------------	--	------------------------	----------------------------	--	--	-----------------------------------	----------------------------	--	--	--	---	---	--	---	--	--	-----------------------------	---	-------------------------------	---------------------------	--	--------------------------	---------------------------	---------------------	----------------------------	------------------------------	----------------------------	--------------------------	--	--	---	---	-----------------------------------	------------------------	-----------------------------	--	--	------------------------	---------------------------

211:1	suspension 97:17 111:25 142:8,10 148:2 195:1	technical 144:15	thoughts 189:15
structures 172:4 176:1	sustain 175:14 176:4 189:25	template 83:22	threatened 156:25
struggle 87:14	sustainable 130:13 132:12	ten 73:10	three-page 188:7 189:10
study 173:16	sustained 176:14	term 121:19 122:1 170:14 173:7	Thursday 52:12,21,22 53:21
subject 99:1 106:22 119:22 122:1 165:14	switch 119:22,23	terms 150:6 162:18 178:21 199:8	time 51:6 52:8,13 54:18 70:22 85:20 100:7 101:7 105:11 110:12 114:9 115:22 132:11 133:20 136:2 139:2 148:20 168:16 180:6 181:11 186:13 187:17, 24 195:8 196:17 197:25 198:7,18 199:2 203:14 205:6 206:16 207:4,16 208:8,9 209:23 211:7, 15,19 212:8,11,15 213:3
submarine 116:23 117:1	sworn 88:7 89:3	testified 88:8 116:8 129:6 179:13	timeline 158:10 202:12 203:1,8 204:6,7 205:10 207:2,3
submarines 116:11	symmetrical 166:3	testify 179:21 190:23	timelines 158:12 203:13
submitted 88:14 99:16,22 158:8 177:5	system 100:21 101:20 103:24 112:2 119:18 138:18 139:14 147:23 154:24 156:13 213:15	testimony 53:7 58:24 59:4,8,13,18,23 60:4, 12,14,19 61:10 62:1,11, 22 63:1,13,18,23 64:4, 9,15,21,25 65:6 66:25 67:8,12,17,22 88:11 89:3 90:25 91:24 93:9 94:9,14 95:6,10 97:8 104:11,21 105:3 110:19 111:20 114:11 115:12, 15 120:3,18 121:1 124:9 125:1,24 129:10 136:11 137:18 138:4 140:21 141:14 147:4,7 149:12 152:12 153:19 154:7 155:2 156:3 157:19 158:8,25 159:8, 12 161:3 162:5 164:10 165:16 167:25 171:14 172:20 174:12,13,15,16 175:9,22 176:3 177:5, 17 190:23 205:7 207:17	timely 200:22
subsection 121:7	systems 111:6 142:22 143:2,19 148:25 151:22	testimony's 141:9	timing 100:11,18
subsequent 108:5 113:23 121:21 148:17 154:4	<hr/> T <hr/>	text 94:10,11	title 60:13 90:9 92:2 146:9 169:11 201:18
subset 200:18	table 125:20,22 126:20, 23,25 127:3,6,17 128:1, 11,16 131:8 157:25 158:1 159:16	thereabouts 131:20	titled 58:23 59:8,12,17, 23 60:4,8,12,18 61:4,9, 16,20,25 62:5,10,16,17, 21,25 63:8,13,23 64:4, 8,15,20,25 65:5,10,14, 20 66:1,7,11,15,20,25 67:8,12,17 68:2,7,15,23 69:4,17,22 70:13 71:6, 10,20,25 72:5,10,15,20 73:15,20,25 74:5,9,18, 23 75:2,7,12,19,24 76:10,16,21 77:1,6,15, 17,23 78:4,9,14,21 79:2,7,12,17,22 80:2,7, 12,20,25 81:10,15,20, 25 145:12,13 147:5 154:9 161:25
Subtitle 154:10	tabled 157:22	thinking 151:9 198:10 199:9 212:6,12	titles 90:13
successful 123:12 151:1	tables 88:13 89:2	third-party 153:23 172:5 173:6,16	to-be-determined 211:3
successfully 149:20 150:4 213:8	tackle 58:17	thought 170:25 175:3 186:12 187:13	today 51:14,21 54:19
sufficient 161:6 178:21	taking 132:5 143:21 168:16 187:11 207:4		
suggest 174:12	talk 53:21 105:18		
suggesting 83:10	talked 183:11 192:8		
sum 158:19	talking 119:5,13,16 175:4,21 187:6 189:4 198:15 207:9 209:17		
summary 89:23 137:3 143:11 209:17	talks 143:12		
supervised 107:22	tax 66:15,21 165:1,7,23, 24 166:1,7,9		
supervision 88:17	taxed 165:9,10		
supervisor 94:19 97:4, 5 189:2	taxes 165:12		
supplement 167:24	Taylor 182:17		
support 94:20 95:7,17 131:2 153:23 200:22	TBD 210:13		
supported 92:17,20 95:14 142:22 178:5	team 93:23 165:19 185:17,23 191:5		
suppose 164:8			
suspend 116:5 138:10, 15 139:3 194:19,23			
suspended 97:9,13,16 110:7 138:23 139:17 147:23			

88:12 89:18 168:17 174:16	transfers 100:4	TURN-3C 67:21,24	underneath 211:2
told 165:21 191:2	transparent 198:8	TURN-4 68:2,4 135:23 161:20	understand 95:5 98:1 103:15 108:3 112:7 116:2 118:18 119:11 131:15 138:24 160:9 161:13 180:9 183:13 185:13
Tom 169:21,22 170:1 179:21 180:8,12 183:11 187:24	travel 193:22	TURN-5 145:12,15,23	understandable 132:16,17
Tom's 189:4	treatment 52:14 164:1 166:3	TURN-5-C 145:6	understanding 114:20 122:6 157:10 159:11,16 164:25
tomorrow 58:6,8,10	Trial 52:15 56:3,4,8 172:15,18 175:16 176:13	TURN-5C 68:6,8	understood 92:22 94:17 98:15 103:4 118:23 186:14 194:20 203:22 204:20 211:3 212:8
tonight 82:14	triennial 51:10 167:11	TURN-6C 68:10,12 154:2	undistributed 151:18
top 153:21	trouble 170:14	TURN-7C 68:14,16	unit 67:1,3 97:22 157:16 211:7,13,15 212:8,11
topic 141:14 206:19 209:8	true 164:16 185:12 187:14	TURN-8 68:18,21	United 90:2 109:3 121:13
total 125:10 158:19	trust 63:1,8,13,18 66:15,20 129:15 130:15,16 131:18 132:1,8,12,15,19 133:9, 12 151:7,13 157:15 160:7,10,11,13,14 161:14,16,18 162:18, 20,23,24 163:7,13,18, 22 164:14,17,23,24 165:2,3,4,12,14,24,25 166:6,10 177:7,8,10 178:4,10,14,17	TURN-9 68:23 69:2	Units 67:1,4 69:22 90:16
totally 198:3	trusts 157:12 160:23	turning 172:19	University 90:1
Tracy 86:4	turn 53:11 57:6 68:3,7, 11,15,19,24,25 69:5,6, 7,17 70:4,9,13 82:12 85:21 91:10 104:5 113:2 122:19 135:17, 20,22 136:4 145:13 154:6 157:4,18 161:19, 22,24,25 167:1 200:7 201:9,14 202:10 205:15	turnover 180:9,16 193:17,22 196:8 197:7	unknown 87:11 132:11
trained 197:11	TURN-1 67:7,9	two-page 186:5 190:5 192:15 193:15 195:7,21 202:4 205:17 206:23	unreasonable 136:21 137:6
training 98:9 112:1,10, 15,23 113:21,24 114:7 115:1 147:24 150:1 186:15 195:25 198:23 200:20 201:1 212:17	TURN-10C 69:4,9	two-unit 211:11,12 212:1	unspecified 207:4
transcribe 105:16	TURN-11 69:11,14	type 83:11 115:20,25 142:13 151:2	unsupported 100:15 103:1
transcript 71:10,15,20, 25 72:5,10,15,20,25 73:5,15,20,25 74:6,10 181:15 182:1,9 183:1 184:6,11,12,15,20 186:5 188:7,10,11 189:10,13,14,18 190:5, 10 192:15,18,19 193:15,18,19 194:12,14 195:7,11,12,21 197:22	TURN-12C 69:16,19	types 153:6	unwedged 95:20,24
transfer 97:9,10,16,20, 21,24 98:2,14,22 102:22 110:6,16 111:25 112:2,3 115:10 138:23 141:5,12,25 142:8 143:13,17 147:23 148:2,4,16,21 149:20 150:4,7 151:11 152:5 153:17 154:24 155:5 180:21 187:19,22 191:7,11,15 192:1 194:19,23 195:2 197:9, 13 198:16,25 200:16,22 202:8 203:20 204:13,16 205:2 206:11 208:10,24 212:13	TURN-13 69:21 70:1	typically 151:18 178:16	update 158:7
	TURN-14 70:3,6	U	uphold 150:25
	TURN-15C 70:8,10	U.S. 100:22 116:11 121:9 123:8 125:15 151:2	utilities 56:20 84:24 85:2 89:13 104:13 123:6,12 174:6
	TURN-16 70:12,15	Uh-huh 162:3	utility 57:8 105:10 173:8
	TURN-17 70:17,20	ultimately 91:6 100:8 130:12 137:4 163:13,18 166:3 170:24 187:7 205:9 208:10	utilize 162:12
	TURN-1C 67:11,14	unanalyzed 99:6	utilizes 159:3
	TURN-2 67:16,19	unanimously 200:24	utilizing 161:15
		uncertainty 129:7,10 130:11	
		unclear 96:24	
		uncontrolled 119:1	
		undergoing 110:10	

<hr/> V <hr/>	warrant 162:10	work 53:2 54:3 84:3 90:1 96:21 104:14 110:9 117:11 137:14 141:1 142:4,5 143:15, 16 150:1,16 151:2 155:23 171:3 196:20 198:21 203:15 204:12, 19 205:1 208:2 213:7
validation 174:5	waste 115:14,16 117:14,17,24 118:14,20 121:20 122:4,7,8 158:23	worked 90:2,5 208:11 212:12
vary 140:8	Watch 167:3,7,9,24 178:25	worker 118:19,22,24 119:3
vendor 144:18 193:7	Watchdogs 57:13,16 58:1 59:8,13,17	workers 118:16 119:14 148:6,19 156:25 194:8
Verde 62:22	Wayne 56:19 80:20 84:15 89:11 120:14 125:14 127:16	working 90:4 97:1 99:7 117:19 199:3 207:17
verified 142:5	ways 142:14	world 137:12 151:3
verify 144:20	wear 208:25 209:18	writers 96:21
versed 108:18	Weaver 59:5	written 150:12
version 53:14 61:10 62:2,11 64:9,25	Webinar 71:16 73:21 74:1 194:13 195:8 204:23 205:22 207:25 212:20,25 213:2	wrote 96:22
versions 53:15	wedged 92:14,16 94:11,16,17	<hr/> X <hr/>
versus 125:9 165:3,12	week 54:9	X-3 181:19
vertical 112:2	weeks 54:12 186:12 187:14 198:6	X-RAY 118:11,12 119:17
vice 90:10,17,19 181:2 190:7	weight 92:19 94:20 95:8,17 97:6	<hr/> Y <hr/>
Victor 186:24	well-aware 204:15	year-to-year 131:22
view 181:10	well-planned 107:21	years 90:7 107:4 116:20 117:2 127:18,22 128:10 132:14 161:18 178:7
Vince 77:1,18 78:4,9,22 79:17 80:12 206:24 208:22 210:8	wet 115:17	yesterday 51:22 52:3, 11 53:8
violation 102:2,4 155:6,9,10,14,18 156:5, 6,7,14 181:24 183:11, 15	whatnot 177:22	<hr/> Z <hr/>
violations 155:5,22	whatsoever 118:8	Zizmor 174:6
VIRTUAL 51:1	why-did-you-do-that 115:25	
visit 146:19	wise 180:6	
voluntarily 110:6	witnesses 85:23 94:6	
voluntary 138:9	witnessing 169:14	
VP 169:11	wondering 177:12	
<hr/> W <hr/>	word 110:24 148:1	
wait 55:4 147:6	worded 185:23	
waive 85:22	words 100:17 115:6 119:1 146:25 191:13 192:9	
wanted 112:6 115:15 125:17 153:12,14 180:20 197:10 201:8 205:8 210:5 211:17,19 213:4		