

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

ADMINISTRATIVE LAW JUDGE TREVOR PRATT, presiding

In the Matter of the Application of)	PREHEARING
Crimson California Pipeline L.P.)	CONFERENCE
(PLC-26) for Authority to Withdraw a)	
Segment of its Seal Beach Pipeline from)	Application
Public Utility Service.)	25-01-003
)	

REPORTER'S TRANSCRIPT
Virtual Proceeding
March 14, 2025
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Reported by: Doris Huaman, CSR No. 10538

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA



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VIRTUAL PROCEEDING

MARCH 14, 2025 - 1:31 P.M.

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ADMINISTRATIVE LAW JUDGE PRATT: Let's go on
the record.

This is the virtual prehearing conference for
Application 25-01-003 filed on January 13th, 2025, by
Crimson California LLP to withdraw the southern portion
of the Seal Beach Pipeline from public utility service
with the intention to close it.

I'm Trevor Pratt, the administrative law judge
assigned to this proceeding. The assigned commissioner
Matthew Baker is not available to join us today, but his
advisor Kyle Navas is here at this prehearing
conference.

The purpose of this prehearing conference is to
discuss the issues and the scope and schedule and
procedural matters for this proceeding. As such, my
agenda for today is to:

One, go over the service list;

Two, discuss the categorization of this
proceeding;

Three, discuss the scope of issues;

Four, discuss the need for hearings;

And five, discuss the schedule for the

1 remainder of this proceeding.

2 Nothing will be decided today as these matters
3 will be determined by the assigned commissioner in an
4 upcoming scoping memo. Since this prehearing conference
5 is being held virtually, I will remind parties and all
6 attendees to refrain from speaking and mute your lines
7 until I direct you to speak.

8 First, let's turn to the service list. In
9 Commission proceedings, the applicant and those who have
10 filed protests or responses are automatically added to
11 the service list. For each company organization, there
12 will be one representative listed as the party. All
13 others will be listed as information only.

14 One formal protest to the application was filed
15 and served. However, I will give members of the public
16 an opportunity to request party status momentarily.
17 First, I will ask the applicant's primary representative
18 to state their name and spell their last name for the
19 record.

20 MR. SQUERI: Thank you, your Honor. My name is
21 James Squeri, S-q-u-e-r-i, appearing on behalf of
22 Crimson California Pipeline.

23 ALJ PRATT: Thank you.

24 Next I will ask the second representative for
25 the applicant to please state their name and spell their

1 last name for the record.

2 MS. KROETSCH: (No audible response.)

3 ALJ PRATT: Ms. Kroetsch.

4 MR. SQUERI: Oh. I'm sorry. Did you ask for
5 whoever is appearing upon behalf of Crimson California?

6 ALJ PRATT: Yes.

7 MR. SQUERI: Ms. Kroetsch was available. I'm
8 not sure where she is.

9 ALJ PRATT: It appears that Ms. Kroetsch has
10 fallen off of the panelists -- has lost internet
11 connection.

12 Going off the record.

13 (Off the record.)

14 ALJ PRATT: Going back on the record.

15 Ms. Kroetsch has fallen offline. Hopefully, she will be
16 back, but Mr. Squeri will proceed forward without her.

17 Next I will ask the representative for DCOR to
18 please state their name and spell their last name for
19 the record.

20 MR. HILTON: Good afternoon, your Honor. Seth
21 Hilton, H-i-l-t-o-n, on behalf of Protestant DCOR LLC.

22 ALJ PRATT: Thank you.

23 Does anyone present seek to become a party to
24 this proceeding?

25 (No response.)

1 Going off the record.

2 (Off the record.)

3 ALJ PRATT: Going back on the record.

4 While off the record, I was checking if any
5 member of the public sought to make a motion. Hearing
6 none, the service list is complete, and we will continue
7 with the prehearing conference.

8 As you may know, the Commission encourages
9 electronic service and requires all documents served
10 electronically to go to everyone on the service list.
11 That includes those who are listed as information only.

12 Next we'll turn to categorization. In its
13 application, Crimson California proposed to categorize
14 this proceeding as ratesetting. In its protest, DCOR
15 concurred that the proceeding should be categorized as
16 ratesetting.

17 On January 30th, 2025, in Resolution ALJ
18 176-3558, the Commission preliminarily determined that
19 the category of this proceeding is ratesetting.

20 Does any party have any concerns about the
21 categorization of ratesetting?

22 MR. SQUERI: No concerns on Crimson's part,
23 your Honor.

24 MR. HILTON: Not on DCOR's part either.

25 (Reporter clarification.)

1 MR. SQUERI: I'm sorry. James Squeri,
2 S-q-u-e-r-i, appearing on behalf of Crimson.

3 Yes. We do not object to ratesetting as the
4 categorization.

5 MR. HILTON: Seth Hilton on behalf of DCOR LLC.
6 We also do not object to having this set as
7 ratesetting.

8 ALJ PRATT: All right. Hearing no objections,
9 I agree. And we'll recommend to the assigned
10 commissioner that the ratesetting categorization is
11 appropriate for this case.

12 Please note that the ratesetting categorization
13 triggers ex parte rules described in Article 8 of the
14 Commission's Rules and Practice and Procedure. Parties
15 that communicate procedural issues with me should do so
16 by email and copy the entire service list. Parties
17 should not communicate with me about nonprocedural
18 issues outside of a public forum that has been noticed
19 to the official service list of this proceeding.

20 Before we discuss the scope and schedule of
21 this proceeding, I have a few questions to both parties
22 about circumstances related to this application.

23 Mr. Squeri, what is the underlying property
24 ownership type of the portion of Seal Beach Pipeline,
25 such as fee ownership or easements?

1 MR. SQUERI: Well, to the extent I understand
2 your question, your Honor, the pipeline is owned by
3 the -- by Crimson California. The property rights, the
4 easements are various and are property rights between
5 Crimson and whatever particular entity that they have
6 arranged for ability to construct a pipeline in that
7 easement.

8 I've had indication from Ms. Kroetsch she's
9 lost her -- the internet connection. She's trying to
10 get back on. And I assume if you have any more specific
11 questions about the property ownership or the underlying
12 easement holders, she might be able to elucidate, but as
13 I said to -- there are a variety of easements under
14 which the 5.8 mile segment of pipeline crosses.

15 ALJ PRATT: Thank you. So to the best of your
16 understanding, is all on easement and Crimson California
17 does not own any of the underlying property and fee
18 status.

19 MR. SQUERI: That is -- Jim Squeri here.

20 That is correct, your Honor.

21 ALJ PRATT: Okay. Thank you.

22 Mr. Hilton, did you have any comment about
23 that?

24 MR. HILTON: Thank you, your Honor. Seth
25 Hilton on behalf of DCOR.

1 No additional comment.

2 ALJ PRATT: Great.

3 Mr. Squeri, where is the Caltrans San Gabriel
4 Bridge widening project in its development process?

5 When does Caltrans expect to begin
6 construction, and when does Caltrans require the
7 pipeline relocation to be completed?

8 MR. SQUERI: Jim Squeri on behalf of Crimson.

9 We have not received any specific construction
10 start date from Caltrans. It's -- it's not always easy
11 dealing with the Caltrans bureaucracy. Our
12 understanding and the assumption that we've been
13 operating on was that the construction start date would
14 be sometime in the 3rd quarter of October, but that's
15 relatively old information.

16 Perhaps when Ms. Kroetsch manages to reconnect
17 and get back on this call she might be able to elucidate
18 further. Ah. There she is.

19 MS. KROETSCH: My apologies. I'm in a new
20 construction area, and my internet goes out sometimes.
21 Of course it was during this moment. So my apologies.

22 So I hear we're talking about timing for the
23 Caltrans construction project. Did I get that correct?

24 ALJ PRATT: Yes.

25 MS. KROETSCH: Okay. So last we had heard was

1 we had been asked to complete a front-end engineering
2 design package for Caltrans by the end of Q1 2025. So
3 essentially, that was to keep them on track to start
4 breaking ground at the beginning of Q3 of this year,
5 2025. We have not received an updated date. We have
6 requested that information, but we have --
7 unfortunately, we haven't heard anything beyond that at
8 this time.

9 ALJ PRATT: Thank you.

10 Mr. Hilton, do you have anything to add about
11 that?

12 MR. HILTON: Thank you, your Honor. Seth
13 Hilton on behalf of DCOR.

14 I do not have anything to add.

15 ALJ PRATT: Thank you. Mr. Hilton, has DCOR
16 been able to secure an alternative route for transfers
17 from Platform Esther?

18 MR. HILTON: DCOR has not been able to secure
19 an alternative route. They are in the process of
20 exploring or pursuing, really, an option that would
21 consist of starting production from another offshore
22 platform, Eva, in conjunction with a settlement with the
23 State Lands Commission. This settlement involves
24 allowing DCOR to use a natural gas pipeline, I believe,
25 that runs between Eva and yet another offshore platform,

1 Edith, so that the production would be transferred to
2 Edith and then onshore.

3 And under the settlement agreement with the
4 State Lands Commission, once Eva is producing for 30
5 days, we would shut down the Esther Platform, which is
6 the platform involved here. So that scenario would
7 eventually lead to an option where we would not need the
8 Seal Beach Pipeline.

9 Unfortunately, the timing of when that might
10 occur is unclear. The settlement with the State Lands
11 Commission is final, but there's some additional permits
12 that are needed to restart Eva. So we are waiting for
13 those particular permits.

14 The hope would be that we'd complete all that
15 process and begin production from Eva before the end of
16 this year, but it's somewhat uncertain at this point.

17 ALJ PRATT: So, for my clarification, you have
18 a pipeline that interconnects Platform Esther to
19 Platform Eva, and so you would be transferring
20 production -- the product that's being produced at
21 Platform Esther to Platform Eva and then on from there?

22 MR. HILTON: No. Slightly different. I
23 apologize. It's -- at least it's confusing to me that
24 all these platforms start with an "E" and we couldn't
25 have chosen a different letter. But it wouldn't involve

1 a direct connection from the platform that connects to
2 the Seal Beach plat -- Pipeline Esther to another
3 platform. It would be restarting Eva, that is, the
4 separate offshore platform. And Eva would -- to do
5 that, it needs to connect to yet a third offshore
6 platform, Edith. So that -- that's the connection.
7 There's no direct -- direct connection to Esther.

8 ALJ PRATT: And how does that affect the --
9 (Crosstalk.)

10 MR. HILTON: It affects -- because as part of
11 the agreement with the State Lands Commission,
12 restarting Eva would involve shutting down Esther. So
13 it's -- so as a result of putting all those pieces
14 together, once Eva starts production, we would --
15 within -- after 30 days, we would no longer be utilizing
16 the Seal Beach Pipeline.

17 ALJ PRATT: And what is driving that settlement
18 agreement with the State Lands Commission?

19 MR. HILTON: In terms of timing or -- the --

20 ALJ PRATT: For that negotiation of where you
21 are reaching a settlement. Is this --

22 MR. HILTON: Yes.

23 ALJ PRATT: -- related directly to the
24 closure -- to the proposed closure of the Seal Beach
25 Pipeline, or was this settlement...

1 (Crosstalk.)

2 MR. HILTON: I can't -- yeah. I can't speak to
3 the -- there was some litigation with the State Lands
4 Commission that resulted in the settlement. It does --
5 the settlement does directly involve Platform Esther,
6 which is the platform we are concerned about here. The
7 settlement, I believe, was entered into and approved,
8 you know, the beginning of this year. So the timing is
9 consistent with dealing with the Seal Beach Pipeline
10 issues.

11 ALJ PRATT: All right.

12 Mr. Squeri, do you have any comments regarding
13 that?

14 MR. SQUERI: No, your Honor.

15 ALJ PRATT: Thank you.

16 So, Mr. Hilton, is DCOR still interested in
17 purchasing the southern portion of the Seal Beach
18 Pipeline?

19 MR. HILTON: That is something I have to
20 explore further with my client.

21 ALJ PRATT: Could negotiations regarding the
22 purchase that had previously occurred resume?

23 MR. HILTON: I think it -- sorry. Seth Hilton
24 on behalf of DCOR.

25 I would say from DCOR's position, we are happy

1 to continue discussions with Crimson about a resolution
2 of what we're going to do with the Seal Beach Pipeline
3 considering Crimson's concerns. So it would be a --
4 kind of a broader topic of working out a resolution,
5 whether that involves sale of the pipeline or something
6 different. We are willing to continue to try and seek a
7 resolution with Crimson at this point.

8 ALJ PRATT: Mr. Squeri, could Crimson resume
9 negotiations with DCOR?

10 MR. SQUERI: Your Honor, I don't think it's
11 very fruitful to discuss the sale of the pipeline to --
12 to DCOR or anyone else. I think that the problem, no
13 matter what level of indemnification we could have, that
14 anything regarding the continued operation of that
15 pipeline would still impose some potential consequential
16 very significant economic risks for Seal -- for Crimson.

17 And it just doesn't seem like a very viable
18 option, and it doesn't seem to sort of meet the time
19 constraints that we appear to be facing, whether with
20 Caltrans or with other development projects that involve
21 the location of the existing pipeline.

22 We've undertook -- we tried to negotiate for a
23 year and a half, and nothing came it of, your Honor.
24 And I frankly don't see it as a viable option for
25 resolving this matter. I think it's pretty clear from

1 the facts on the ground that the Seal Beach Pipeline
2 needs to come out of service, that -- the notion that it
3 continuing in service is too problematic, both from an
4 environmental perspective and also from the consequences
5 of how it would affect the Caltrans project and other
6 development projects.

7 So, realistically, we don't believe that it's a
8 useful expenditure of our time to sort of negotiate a
9 potential sale of the pipeline to DCOR.

10 ALJ PRATT: All right.

11 Have either/or the both of you considered
12 and/or would be interested in the Commission's
13 Alternative Dispute Resolution Program to try to
14 establish settlement? Not necessarily --

15 MR. SQUERI: Your Honor, Jim Squeri.

16 (Crosstalk.)

17 MR. SQUERI: If I -- if I might be heard. I'm
18 very much interested in a settlement. And I'm more
19 interested in the best process for us to accomplish
20 that, and I'm reasonably familiar with the ADR process.
21 And that is an option.

22 But, actually, I'm -- and I'll make this
23 overture to Mr. Hilton. I think this maybe best a
24 negotiation that appear -- that takes place between the
25 parties.

1 I'm hopeful that both of us operating in good
2 faith could reach a resolution. We've got, I think, a
3 recognition that -- that it's most realistic for the
4 pipeline to come out of service. We have a recognition
5 that DCOR has a legitimate interest in getting its
6 product to market and having a viable alternative. And
7 somewhere we're hopeful that we have a middle ground
8 that we can get sufficient assurance that we can manage
9 this so that we don't necessarily disrupt the Caltrans
10 project or other significant development projects that
11 are ongoing in the location.

12 So I'm in favor of negotiations. I'm not sure
13 at this time that it's best to go to the ADR process. I
14 would tend to recommend a two-party negotiation between
15 the parties, but I am certainly open to ADR.

16 ALJ PRATT: Mr. Hilton, your thoughts.

17 MR. HILTON: Yes. Seth Hilton on behalf of
18 DCOR.

19 DCOR would be willing to engage in the ADR
20 process but perfectly happy to engage in kind of
21 two-party negotiations along with what Mr. Squeri
22 suggested and maybe see if that process could lead to a
23 resolution of this without having to invoke the ADR
24 procedures.

25 ALJ PRATT: Great. Thank you.

1 Now let's turn to the scope of issues in this
2 proceeding. Based upon my prior review of the
3 application, protest and reply, I'm inclined to
4 recommend the following issues to the assigned
5 commissioner for the scope of the proceeding:

6 One, whether the public interest is served by
7 withdrawing a portion of the Seal Beach Pipeline from
8 public utility service;

9 (a) does the continued operation of the portion
10 of the Seal Beach Pipeline represent a risk to public
11 health and/or the environment greater than other similar
12 pipelines including the rest of the Seal Beach Pipeline?
13 If so, how can those risks be mitigated to a level
14 typical of operating oil pipelines;

15 (b) would the continued operation of the
16 portion of Seal Beach Pipeline harm Crimson California?
17 If so, what is the nature of that harm;

18 (c) what would be the expected rate impacts on
19 Crimson California's customers to continue safe
20 operation of the portion of the Seal Beach Pipeline;

21 (d) are there any service alternatives
22 available to DCOR to transfer product from DCOR's
23 Platform Esther to DCOR's refining facility;

24 Two, if approved for a withdrawal of service,
25 what is the appropriate final disposition of the portion

1 of Seal Beach Pipeline;

2 (a) can the pipeline be sold and safely
3 operated by another entity such as DCOR;

4 (b) what is an acceptable level of elimination
5 of potential pollutants for the closure of the pipeline;

6 (c) will the proposed closure method ensure
7 elimination of potential pollutants prior to abandonment
8 of a -- to an acceptable level;

9 (d) do any of the franchise agreements,
10 licenses, permits or other applicable statutes or
11 regulations require specific cleanup and closure
12 methods;

13 (e) what is the reasonable cost of the closure
14 of the pipeline segment;

15 Three, is the proposed pipeline withdrawal of
16 service, closure and abandonment exempt from the
17 California Environmental Quality Act;

18 Four, does the withdrawal and disposal of the
19 portion of Seal Beach Pipeline comply with the
20 Commission's tribal lands transfer policy?

21 Do you have any comments on the potential
22 issues as I have outlined them?

23 Mr. Squeri.

24 MR. SQUERI: No, your Honor. It's a very
25 comprehensive list.

1 ALJ PRATT: Mr. Hilton.

2 MR. HILTON: Thank you, your Honor. Seth
3 Hilton on behalf of DCOR.

4 The one slight addition I would make is
5 there's -- I think one of the key issues is timing, and
6 that may fit under category one. So it's the timing of
7 any potential withdrawal, the timing associated with the
8 potential risks that Crimson is facing and then, of
9 course, the timing associated with the alternative that
10 DCOR is pursuing at this time.

11 ALJ PRATT: Thank you.

12 Are there any additional issues that either of
13 the parties wishes to add? I'm especially interested in
14 knowing if there are any safety issues or environmental
15 and social justice issues that should be considered by
16 the Commission while evaluating the application.

17 Mr. Squeri.

18 MR. SQUERI: Your Honor, I'm not aware of any
19 issues relating to environmental and social justice that
20 this application raises.

21 ALJ PRATT: Mr. Hilton.

22 MR. HILTON: Nothing from me either. Thank
23 you.

24 ALJ PRATT: Thank you.

25 So now we will move to the schedule and the

1 need for hearings. The applicant in both its
2 application and reply proposed a schedule that includes
3 hearings. DCOR has identified in its protest several
4 material facts that it seeks evidentiary hearing on.

5 Mr. Hilton, do you have any additional comment
6 on material facts in dispute or changes from what you
7 discussed in the protest?

8 MR. HILTON: Seth Hilton on behalf of DCOR.

9 No, I do not, other than to say I agree there
10 are material issues that would warrant hearings in this
11 case.

12 ALJ PRATT: All right.

13 Mr. Squeri, do you have any comments on the
14 material facts that Mr. Hilton identified, and are there
15 any additional material facts that should be subject to
16 evidentiary hearings?

17 MR. SQUERI: Thank you, your Honor. No, I have
18 no further comments regarding the issues to be addressed
19 at hearing.

20 ALJ PRATT: Thank you.

21 I may ask you both for further statements
22 regarding material facts in dispute prior to the
23 scheduling of evidentiary hearings.

24 The applicant has proposed approximately 15
25 days between each round of testimony in the beginning of

1 evidentiary hearings, whereas DCOR has proposed
2 approximately 30 days between each event.

3 Is that still the case, Mr. Squeri?

4 MR. SQUERI: Yes, your Honor. We're interested
5 in moving forward as expeditiously as possible.

6 ALJ PRATT: And Mr. Hilton.

7 MR. HILTON: Yes. That's still DCOR's
8 position. We believe we need some additional time.

9 ALJ PRATT: All right. The applicant has
10 proposed a timeline for this application to result in a
11 decision to be presented to the Commission for a vote in
12 August 2025.

13 Mr. Squeri, are there any specific factors
14 driving the urgency of this application and the
15 aggressiveness of your proposed schedule?

16 Are there any specific consequences tied to a
17 specific date?

18 MR. SQUERI: Thank you, your Honor. In
19 general -- and we lack specificity with the exact sort
20 of start date with the Caltrans project, but obviously
21 that is a specific consequence that we're looking to
22 make sure that we're -- we're not in a position where
23 failure to act on the subject application causes
24 trans -- a delay in Caltrans' project.

25 There also is another project -- development

1 project that there are consequences to delay in getting
2 approval in this -- in this application, that if
3 Ms. Kroetsch is still on the line that maybe I'd ask her
4 to elaborate on the circumstances of that development
5 and how it is a consequence of any delay in getting --
6 it's a negative consequence of any delay in getting
7 timely approval of this request to withdraw service.

8 MS. KROETSCH: Mandy Kroetsch, Crimson.

9 I would just like to add that we have been
10 receiving several requests from a developer who is
11 looking to develop a condominium-type development close
12 to the -- in Long Beach close to the corner of 2nd and
13 PCH. It is a large development which would add
14 significant amount of housing to the area. And it is
15 such that they are getting a little nervous because they
16 expressed, in the last meeting with them, which was just
17 a few weeks ago -- two weeks ago, that they are in
18 completion of a previous project and have 100 employees
19 who are looking to transition to the next project, which
20 is this project.

21 We have been in discussions with them about us
22 relocating our pipeline or removing it completely from
23 the property because it is in conflict with their
24 development location, the footprint.

25 In the last meeting we had with them, they had

1 very detailed drawings that we went through together,
2 and it was very clear to me in that meeting that their
3 groundwork and laying of piles and formwork would come
4 within three feet our pipeline. So this is an active
5 pipeline currently carrying crude oil, and that is of
6 extreme concern to me as the president at Crimson.

7 We talked through various options for them to
8 be able to work away and from proximity to our pipeline,
9 but I recognize that in development you have to do
10 groundwork to level the ground before you can really do
11 any sequential phases of the project. So there was very
12 minimal opportunity for changes in that sense.

13 So my biggest concern is that we've been
14 delaying them for far too long because of this situation
15 that has been in negotiation for two years. And I'm of
16 concern that they are going to stop asking for a
17 resolution from Crimson and could potentially cause a
18 impact to our pipeline, right? There's only so much
19 work that they can do before we are out of their way,
20 and that's of extreme concern for me. So that's the
21 only addition I have. Thank you.

22 ALJ PRATT: Ms. Kroetsch, can you clarify the
23 nature of the land rights for that development, whether
24 you have superior rights?

25 MS. KROETSCH: I don't have the detail that of

1 which I would have to look into. What I do know is that
2 we have an easement which is allowing our pipeline in
3 the segment where it exists today, but I don't know what
4 the details of that easement are, whether it's superior
5 or not. So, unfortunately, I'm unable to answer your
6 question in the moment.

7 ALJ PRATT: Thank you. I may follow-up with
8 you about that --

9 MS. KROETSCH: Yes. Thank you.

10 ALJ PRATT: -- as to who would be paying for
11 that relocation.

12 Mr. Hilton, do you have any comment?

13 MR. HILTON: Thank you, your Honor. Yeah.
14 Just a brief comment. First of all, none these concerns
15 were laid out in any particular detail in the
16 application itself and haven't been submitted as
17 evidence to the Commission yet. And while I certainly
18 appreciate the concerns around the development, I'm not
19 sure we should assume that there's a risk that the
20 development would cause injury to the pipeline or the
21 developer would be hasty or negligent in that way that
22 they would request injury to the pipeline.

23 And although there may be significant economic
24 consequences to the developer, there is also significant
25 economic consequences to DCOR associated with that line

1 as well.

2 ALJ PRATT: Thank you. As I previously
3 mentioned, I may issue rulings requesting additional
4 information as the proceeding progresses.

5 Are there any other procedural matters that
6 should be addressed today?

7 (No response.)

8 ALJ PRATT: Hearing none, Mr. Squeri, I did
9 want to give you an opportunity. Was there anything you
10 wanted to circle back to talk about, what we had spoken
11 while Ms. Kroetsch was off the line?

12 MR. SQUERI: No thank you, your Honor.

13 ALJ PRATT: Well, in that case, thank you all
14 for your participation today.

15 We are adjourned and off the record.

16 (At the hour of 2:05 p.m., the Commission
17 then adjourned.)

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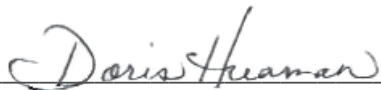
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, DORIS HUAMAN, CERTIFIED SHORTHAND REPORTER
NO. 10538, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 14, 2025.

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

EXECUTED THIS MAY 09, 2025.


DORIS HUAMAN
CSR NO. 10538

<hr/>	acceptable 17:4,8	applicable 17:10	Bridge 8:4
<hr/>	accomplish 14:19	applicant 3:9,25 19:1, 24 20:9	broader 13:4
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