

OF THE STATE OF CALIFORNIA

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In the Matter of the Application of Crimson California Pipeline L.P. (PLC-26) for Authority to Increase Rates for Its Crude Oil Pipeline Services. (SOUTHERN CALIFORNIA)

Application No.	

APPLICATION

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Attorneys for Crimson California Pipeline, L.P.

Date: June 30, 2025

OF THE STATE OF CALIFORNIA

In the Matter of the Application of Crimson California Pipeline L.P. (PLC-26) for Authority to Increase Rates for Its Crude Oil Pipeline Services. (SOUTHERN CALIFORNIA)

Application N	lo

APPLICATION

Pursuant to Section 455.3 of the California Public Utilities Code¹ and in accordance with Rules 2.1, 2.2, 3.2, and 7 of the Commission's Rules of Practice and Procedure, Crimson California Pipeline L.P. ("Crimson" or "Applicant") respectfully requests that the California Public Utilities Commission ("Commission") authorize Crimson to increase the rates that it charges for transportation of crude oil on its southern California ("SoCal") pipeline system by 10 percent effective August 1, 2025, subject to refund. Crimson's SoCal system consists of approximately 300 miles of active pipeline connecting various producing fields in the Los Angeles Basin to refineries in Los Angeles.

Section 455.3 authorizes an oil pipeline to increase its rates by up to 10 percent upon providing 30 days' notice and without the need for prior Commission approval, provided that the increase remains subject to retroactive Commission adjustment and refund with interest, as appropriate. Given required and proper notice to its shippers, Crimson proposes to increase each of the individual rates on its system by 10 percent thereby increasing its current average transportation rate from \$1.1325/bbl. to \$1.2458, resulting in an estimated increase in annual

¹ All statutory references are to the California Public Utilities Code unless otherwise noted.

revenue of approximately \$2.85 million. Crimson requests that the subject rate increase become effective August 1, 2025.

Pursuant to the provisions of Section 455.3(b)(5), Crimson requests that the Commission authorize Crimson to retroactively recover the difference, if any, between the rates in effect as of August 1, 2025 and the rates ultimately approved by the Commission in the subject proceeding. In conjunction with its request for Commission authorization of retroactive rate recovery pursuant to Section 455.3(b)(5), Crimson asks that any retroactive relief authorized by the Commission include interest calculated at the 90-day commercial paper rate.

1. Applicant Information Required by Rule 2.1(a)

Applicant Crimson is a California limited partnership. Its principal place of business is 1900 Main St., Suite 600; its telephone number is (562) 285-4100. Its general partner is Crimson Pipeline, LLC, which is wholly owned by Crimson Midstream Operating, LLC. Crimson Midstream Operating, LLC is wholly owned by Crimson Midstream Holdings, LLC. Crimson Midstream Holdings, LLC is jointly owned by Mr. John Grier (50.5% ownership) and CorEnergy Infrastructure Trust, Inc. (49.5% ownership).²

2. Correspondence and Communication Information Required by Rule 2.1(b)

Correspondence and communications concerning this Application should be directed to the following Crimson representatives:

² Application No. 24-05-007 filed May 15, 2024 requests Commission authorization for the transfer of control of Crimson and San Pablo Bay Pipeline Company LLC to CorEnergy Infrastructure Trust, Inc.

revenue of approximately \$2.85 million. Crimson requests that the subject rate increase become effective August 1, 2025.

Pursuant to the provisions of Section 455.3(b)(5), Crimson requests that the Commission authorize Crimson to retroactively recover the difference, if any, between the rates in effect as of August 1, 2024 and the rates ultimately approved by the Commission in the subject proceeding. In conjunction with its request for Commission authorization of retroactive rate recovery pursuant to Section 455.3(b)(5), Crimson asks that any retroactive relief authorized by the Commission include interest calculated at the 90-day commercial paper rate.

1. Applicant Information Required by Rule 2.1(a)

Applicant Crimson is a California limited partnership. Its principal place of business is 1900 Main St., Suite 600; its telephone number is (562) 285-4100. Its general partner is Crimson Pipeline, LLC, which is wholly owned by Crimson Midstream Operating, LLC. Crimson Midstream Operating, LLC is wholly owned by Crimson Midstream Holdings, LLC. Crimson Midstream Holdings, LLC is jointly owned by Mr. John Grier (50.5% ownership) and CorEnergy Infrastructure Trust, Inc. (49.5% ownership).²

2. <u>Correspondence and Communication Information Required by Rule 2.1(b)</u>

Correspondence and communications concerning this Application should be directed to the following Crimson representatives:

² Application No. 24-05-007 filed May 15, 2024 requests Commission authorization for the transfer of control of Crimson and San Pablo Bay Pipeline Company LLC to CorEnergy Infrastructure Trust, Inc.

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3. Organization and Qualification to Transact Business Documents Required by Rule 2.2

Per Rule 2.2 of the Commission's Rules of Practice and Procedure, Crimson's Certificate of Status as a California limited partnership in good standing is included as Exhibit A hereto.

4. Information Required by Rule 3.2

A. Balance Sheet and Income Statement:

Financial statements, including the most recently available balance sheet and income statement for Crimson, are attached as Exhibit B hereto.

B. Statement of Presently Effective and Proposed Rates:

Current and proposed rates for Crimson's SoCal pipeline reflecting the 10 percent increase in rates implemented pursuant to Section 455.3 are set forth in Exhibit C.

C. General Description of Crimson's Property and Equipment:

Crimson currently owns and operates six common carrier crude oil pipeline systems in California, including various common carrier crude oil pipeline systems acquired pursuant to Commission authorization.³

³ For clarity, the six Crimson jurisdictional pipeline systems are identified as follows: (1) THUMS; (2) Wilmington (Ventura) 10"; (3) Wilmington (Ventura) gathering; (4) Line 600/700; (5) Brea West; and (6) Chevron Northam, Inglewood and #3-6" line.

II. JUSTIFICATION FOR REQUESTED RATE INCREASE

Exhibit D hereto, the Declaration of Michael J. Webb, sets forth the basis, as well as justification, for Crimson's Section 455.3 rate increase request. The proposed increase is reasonable given that requested rate increases will provide Crimson with the opportunity to realize the reasonable return on its utility investment to which it is entitled by law.

As set forth in Dr. Webb's Declaration, on June 28, 2024, Crimson filed A.24-06-019, in which he calculated a cost of service which supported a 36.92 percent increase above the then effective rates, which were approved in Decision No. D.24-05-007. As part of A.24-06-019, on August 1, 2024, Crimson then increased the SoCal rates by 10 percent pursuant to P.U. Code Section 455.3.

On April 21, 2025, Administrative Law Judge LeQuang, the presiding officer in A. 24-06-019, issued a ruling requesting further information from Crimson, including recalculated achieved returns reflecting removal of specified costs from Dr. Webb's previously submitted declaration in support of Crimson's request in A. 24-06-019 to increase rates by 36.92 percent.

On May 15, 2025, Crimson provided its response to ALJ LeQuang's ruling, including Dr. Webb's calculated of a modified cost of service which excluded all allocated expenses associated with CorEnergy Infrastructure Trust, Inc. ("CorEnergy"). The modified cost of service supported a rate increase of 26.35 percent above the rates approved in D.24-05-007, or 14.67 percent above the current rates which went into effect on August 1, 2024.⁴

The cost of service and achieved return figures relied upon by Dr. Webb in this application (attached as) are the same cost of service and achieved return figures calculated by Dr. Webb in Crimson's May 15, 2025 response to ALJ LeQuang's ruling in pending A.24-06-

⁴ SoCal has since raised its rates by 10%. (1 + 26.35%)/(1 + 10%) - 1 = 14.87%.

019.⁵ This modified cost of service supports a rate increase of 26.35 percent above the rates approved in D.24-05-007, or 14.67 percent above the current rates which went into effect on August 1, 2024.⁶

If the Commission approves the rate increase requested in A. 24-06-019, the subject application will become moot.

III. INFORMATION REQUIRED FOR RULE 2.1(C) AND RULE 7 COMPLIANCE

The subject application seeks authorization, pursuant to Section 455.3 of the Public Utilities Code, for Crimson to increase the rates it charges for intrastate public utility pipeline services by ten percent effective August 1, 2025.

Crimson has provided all shippers affected by the proposed rate increases with copies of the subject application.

- A. Proposed Category: Crimson proposes that the application be treated as a "ratesetting" proceeding.
- B. Need for Hearing: Hearings will be needed on this application only to the extent a material issue of fact is raised by timely protest. Accordingly, Crimson does not know whether a hearing will be required. If no hearing is required, Crimson would request that an ex parte decision approving the rate increase request be issued by the Commission by year end 2025. If a hearing is required, Crimson proposes a schedule as set forth below.
- C. Issues Requiring Consideration: The issues raised by this application are as follows: (1) whether Crimson's proposal to increase rates by 10% on its pipeline effective August 1, 2025 is just and reasonable.

⁵ Exhibit D; Declaration of Michael J. Webb; Exhibit No. MJW-2.

⁶ SoCal has since raised its rates by 10%. (1 + 26.35%)/(1 + 10%) - 1 = 14.87%.

D. Proposed Schedule: Crimson proposes the following schedule:

Application Filed June 27, 2025

Notice in Daily Calendar TBD by CPUC Docket Office

Protests Due 30 Days After Daily Calendar Notice

Prehearing Conference August, 2025
Applicant's Opening Testimony October, 2025

Intervenor Testimony Due November, 2025
Applicant's Rebuttal Testimony December, 2025

Harrings January 2026

Hearings January, 2026

Concurrent Opening Briefs February, 2026

Concurrent Reply Briefs March, 2026

ALJ Draft Decision June, 2025

Commission Decision July, 2026

IV. EXHIBITS

As required by Commission Rules 15, 16, and 23, Crimson provides the following information and exhibits:

Exhibit A Crimson Certificate of Status

Exhibit B Crimson Financial Statements

Exhibit C Current and Proposed Rates

Exhibit D Declaration in Support of Rate Increase

WHEREFORE, Crimson requests:

- 1. That the Commission issue an opinion and order approving the requested increases in Crimson's SoCal crude oil pipeline tariff rates as quickly as is practicable; and
- 2. That the Commission grant such other and further relief as shall be just and proper. Crimson is prepared to review the analysis and forecasts supporting this filing with Staff upon request.

Respectfully submitted this 30th day of June, 2025 at San Francisco, California.

CBL ENERGY LAW PLLC

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1800 West Loop South, Suite 1680

Houston, Texas 77027

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DOWNEY BRAND LLP

James D. Squeri

455 Market Street, Suite 1500 San Francisco, California 94105 Telephone: (415) 848-4831

Email: jsqueri@downeybrand.com

By: /s/ Deborah R. Repman

Deborah R. Repman

By: /s/ James D. Squeri

James D. Squeri

Attorneys for Crimson California Pipeline, L.P.

VERIFICATION OF COUNSEL

I, James D. Squeri, declare:

I am an attorney at law duly admitted and licensed to practice before all courts of

this state and I have my professional office at Downey Brand LLP, 455 Market Street, Suite

1500, San Francisco, California 94105.

I am an attorney for Applicant, Crimson California Pipeline, L.P., in the above-

entitled matter.

No officer of Crimson California Pipeline, L.P. is present in the county in which I

have my office and for that reason I am making this verification on behalf of Crimson California

Pipeline, L.P.

I have read the foregoing Application and know its contents thereof.

I am informed and believe that the matters stated therein are true and,

on that ground, I allege that the matters stated therein are true.

I declare under penalty of perjury under the laws of the State of California that the

foregoing is true and correct.

Executed at San Francisco, California on this 30th day of June, 2025.

/s/ James D. Squeri

James D. Squeri

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EXHIBIT A

Certificate of Status



Secretary of State Certificate of Status

I, SHIRLEY N. WEBER, PH.D., California Secretary of State, hereby certify:

Entity Name:

CRIMSON CALIFORNIA PIPELINE, L.P.

Entity No.:

200405400002

Registration Date: 02/20/2004

Entity Type:

Limited Partnership - CA

Formed In:

CALIFORNIA

Status:

Active

The above referenced entity is active on the Secretary of State's records and is authorized to exercise all its powers, rights and privileges in California.

This certificate relates to the status of the entity on the Secretary of State's records as of the date of this certificate and does not reflect documents that are pending review or other events that may impact status.

No information is available from this office regarding the financial condition, status of licenses, if any, business activities or practices of the entity.



IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of June 23, 2025.

SHIRLEY N. WEBER, PH.D.

Secretary of State

Certificate No.: 340362128

To verify the issuance of this Certificate, use the Certificate No. above with the Secretary of State Certification Verification Search available at bizfileOnline.sos.ca.gov.

EXHIBIT B

Crimson Financial Statements

Consolidated CorEnergy

202-Crimson California Pipeline For the Twelve Months Ending Tuesday, December 31, 2024

Accounts and other receivables Inventory Prepaid expenses and other Assets Operating Right-of-Use Asset Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	
Current Assets Cash Accounts Receivable - Trade Accounts and other receivables Inventory Prepaid expenses and other Assets Operating Right-of-Use Asset Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	(55,819) 2,678,155 664,025 125,551 1,302,815 3,988,151 8,702,878 1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Current Assets Cash Accounts Receivable - Trade Accounts and other receivables Inventory Prepaid expenses and other Assets Operating Right-of-Use Asset Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	2,678,155 664,025 125,551 1,302,815 3,988,151 8,702,878 1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Cash Accounts Receivable - Trade Accounts and other receivables Inventory Prepaid expenses and other Assets Operating Right-of-Use Asset Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	2,678,155 664,025 125,551 1,302,815 3,988,151 8,702,878 1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Accounts Receivable - Trade Accounts and other receivables Inventory Prepaid expenses and other Assets Operating Right-of-Use Asset Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	2,678,155 664,025 125,551 1,302,815 3,988,151 8,702,878 1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
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Inventory Prepaid expenses and other Assets Operating Right-of-Use Asset Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	125,551 1,302,815 3,988,151 8,702,878 1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Prepaid expenses and other Assets Operating Right-of-Use Asset Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	1,302,815 3,988,151 8,702,878 1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Operating Right-of-Use Asset Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	3,988,151 8,702,878 1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Total Current Assets Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets 3 Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	8,702,878 1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Fixed Assets Property and Equipment (Accum. Dep.) Total Fixed Assets 3 Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets **TOTAL ASSETS** **LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue **3 **Autocounts Dept.** **Total Accounts Dept.**	1,932,574 (223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Property and Equipment Property and Equipment (Accum. Dep.) Total Fixed Assets 3 Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililities AP and other accrued liabilities AP and other Assets Other Current Liabilities Income Tax Liability Unearned Revenue	(223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Property and Equipment (Accum. Dep.) Total Fixed Assets 3 Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	(223,865) 1,708,709 1,340,084 6,741,229 8,081,313
Property and Equipment (Accum. Dep.) Total Fixed Assets 3 Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	1,708,709 1,340,084 6,741,229 8,081,313
Other Assets Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	1,340,084 6,741,229 8,081,313
Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	6,741,229 8,081,313
Intercompany Receivables Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	6,741,229 8,081,313
Investment in Subsidiary Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	6,741,229 8,081,313
Total Other Assets TOTAL ASSETS \$ 44 LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	8,081,313
TOTAL ASSETS LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	
LIABILITIES & EQUITY Liabililites AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	8,492,900
Liabililities AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	
Liabililities AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	
AP and other accrued liabilities Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	
Total Accounts Payable Other Current Liabilities Income Tax Liability Unearned Revenue	5,725,429
Other Current Liabilities Income Tax Liability Unearned Revenue	5,725,429
Income Tax Liability Unearned Revenue	3,723,429
Unearned Revenue	
	800
Total Other Current Liabilities	1,784,953
	1,785,753
Long-Term Liabilities	
	1,598,222
	4,250,477
	5,848,699
Total Liabilities 1	3,359,882
Equity	
·	4,384,163
	4,671,270
	6,077,585
, ,	
TOTAL LIABILITIES & EQUITY \$ 4	5,133,018

Consolidated CorEnergy 202-Crimson California Pipeline For the Twelve Months Ending Tuesday, December 31, 2024

		202
	Crim	son California
	Pi	peline, L.P.
Revenue		
Transportation	\$	37,268,835
Other		332,051
Total Revenue		37,600,887
Expenses		
Operating Expenses		
Salaries & Benefits Opex		(5,354,515)
Materials and Supplies		(237,686)
Field Office		(64,608)
Asset Maintenance		(6,242,016)
Outside Services		(2,534,813)
Utilities and Power		(2,318,713)
Right of Way		(2,674,520)
Regulatory, Environmental, and Safet	3	(1,430,578)
Insurance and Bonds		(1,968,428)
Taxes		(605,665)
Other Expenses		(1,521,782)
Total Operating Expenses		(24,953,322)
SG&A Expenses		
Salaries & Benefits - G&A		(3,279,312)
Professional Services		(1,703,133)
Director's Fees		(161,829)
Other expenses - G&A		(870,601)
Total SG&A Expenses		(6,014,876)
Total Expenses		(30,968,198)
Net Ordinary Income		6,632,689
Other Income/Expense		
Gain (Loss) on Sale of Fixed Assets		10,724
Depreciation Expense		(607,677)
Current Tax Expense		(800)
Other Income/Expense		42,650
Total Other Income/Expense		(555,103)
Net Income		6,077,585

EXHIBIT C

Current and Proposed Rates

Crimson California Pipeline L.P.

10% increase; rates in cents per barrel

Current Tariff	P/L - Route	Current Rate, cpb	Proposed 10% Rate, cpb Effective 08/01/25	Increase, 9
		41100		
_ine 700 - Gath	•			
CPUC 90.8	01 - REDU - Stewart	65.54	72,09	10%
CPUC 90.8	02 - Stearns Jct - Stewart	65.54	72.09	10%
CPUC 90.8	03 - W Naranjal - Stewart	65.54	72.09	10%
CPUC 90.8	04 - Sansinena - Stewart	65.54	72.09	10%
CPUC 90.8	05 - Trucks - Stewart	44.57	49.02	10%
CPUC 90.8	06 - Butler Road - Norwalk	65.54	72.09	10%
ine 700 - Trun	k			
CPUC 91.10	01 - Stewart - Phillips 66	154.68	170.14	10%
CPUC 91.10	02 - Stewart - World Oil	159.12	175.03	10%
CPUC 91.10	03 - Norwalk - Phillips 66	133.70	147.07	10%
CPUC 91.10	04 - Norwalk - World Oil	141.85	156.03	10%
ine 600 - Gath	oring			
	•	85.54	72.00	400/
CPUC 92.8	01 - Mandalay - Ventura	65.54	72.09	10%
CPUC 92.8	02 - Saticoy - Santa Paula	65.54	72.09	10%
CPUC 92.8	03 - Sulphur Crest - Santa Paula	65.54	72.09	10%
CPUC 92.8	04 - South Mtn - Santa Paula	65.54	72.09	10%
CPUC 92.8	05 - Trucks - Santa Paula	44.57	49.02	10%
CPUC 92.8	07 - Torrey Gath - Torrey	65.54	72.09	10%
ine 600 - Trun	k			
CPUC 93.9	01- Ventura - PBF	175.65	193.21	10%
CPUC 93.9	02 - Ventura - Torrance	175.65	193,21	10%
CPUC 93.9	03 - Ventura - Sepulveda Vault	175.65	193.21	10%
CPUC 93.9	04 - Santa Paula - PBF	175,65	193.21	10%
CPUC 93.9	05 - Santa Paula - Torrance	175.65	193.21	10%
		175.65	193.21	10%
CPUC 93.9	06 - Santa Paula - Sepulveda Vault	175.65	193.21	
CPUC 93.9	07 - Torrey - PBF			10%
CPUC 93.9 CPUC 93.9	08 - Torrey - Torrance 09 - Torrey - Sepulveda Vault	175.65 175.65	193.21 193.21	10% 10%
	•			
West LA Gathe	•	QE E4	72.09	10%
CPUC 94.8	01 - Las Cienegas - Venice Tie-in	65.54	72.09	1076
Vest LA Trunk				
CPUC 95.9	01 - Pico Tie-in (Tennessee Ave) - PBF	117.97	129.76	10%
CPUC 95.9	02 - Pico Tie-in (Tennessee Ave) - Torrance	117.97	129.76	10%
CPUC 95.9	03 - Pico Tie-in (Tennessee Ave) - Sepulveda Vault	117.97	129.76	10%
CPUC 95.9	04 - Venice Tie-in (Las Cienegas) - PBF	117.97	129.76	10%
CPUC 95.9	05 - Venice Tie-in (Las Cienegas) - Torrance	117.97	129.76	10%
CPUC 95.9	06 - Venice Tie-in (Las Cienegas) - Sepulveda Vault	117.97	129.76	10%
Nohawk to Ver	ntura Tank Farm			
CPUC 96.8	01 - Mohawk to Ventura TF	39.56	43.51	10%
Seena to Santa	Paula / Ventura			
		22.88	25.16	10%
CPUC 97.8 CPUC 97.8	01 - Sespe to Santa Paula 02 - Santa Paula to Ventura	36.70	40.37	10%
entura Tank F	Farm to LA Area Refineries 02 - Ventura - PBF	149.67	164.63	10%
CPUC 98.9	03 - Ventura - Phillips 66	149.67	164.63	10%
CPUC 98.9	04 - Ventura - Lomita Manifold Area	149.67	164.63	10%
CPUC 98.9	05 - Ventura - Marathon	166.84	183.52	10%
CPUC 98.9	06 - Ventura - Torrance	149.67	164.63	10%

Inglewood Cor	nnection to LA Area Refineries			
CPUC 99.9	01 - Inglewood - Sepulveda Vault (0 to 360 mbl/month)	142.06	156.26	10%
CPUC 99.9	02 - Inglewood - PBF (0 to 360 mbl/month)	142.06	156.26	10%
CPUC 99.9	03 - Inglewood - Torrance Station (0 to 360 mbl/month)	142.06	156.26	10%
CPUC 99.9	04 - Inglewood - Sepuvelda (over 360 mbl/month)	81.52	89.67	10%
CPUC 99.9	05 - Inglewood - PBF (over 360 mbl/month)	81.52	89.67	10%
CPUC 99.9	06 - Inglewood - Torrance Station (over 360 mbl/month)	81.52	89.67	10%
Lomita Manifol	ld Area to Tesoro			
CPUC 100.8	01 - Lomita Manifold Area to Tesoro	20.26	22.28	10%
Ventura Gathe	rina			
CPUC 101.8	01 - Sespe to Ventura	65.54	72.09	10%
CPUC 101.8	02 - San Miguelito to Ventura	46.24	50.86	10%
CPUC 101.8	03 - Ventura (Taylor/RBU, C&D) to Ventura	46.24	50.86	10%
Thums System	1			
CPUC 102.9	01 - Beta to Marathon, Phillips 66, Valero	71.26	78.38	10%
CPUC 102.9	03 - Thums to Marathon, Phillips 66, Valero	71.26	78.38	10%
CPUC 102.9	05 - WTU to Marathon, Phillips 66, Valero	71.26	78.38	10%
CPUC 102.9	07 - NWU to Phillips 66	71.26	78.38	10%
Inglewood Pip	peline			
CPUC 103.8	01 - Inglewood to Crimson	52.42	57.66	10%
Northam Truni	k System			
CPUC 104.10	01 - Montebello to Norwalk Station	212.13	233.34	10%
CPUC 104.10	02 - Seal Beach to Norwalk Station	121.56	133.71	10%
CPUC 104.10	03 - Huntington Beach to Phillips 66	271.73	298.90	10%
CPUC 104.10	04 - Huntington Beach to World Oil	271.73	298.90	10%
CPUC 104.10	05 - Huntington Beach to PBF	286.52	315.17	10%
CPUC 104.10	06 - Huntington Beach to Marathon	332.27	365.49	10%
Stewart Norwa	ilk to PBF			
CPUC 107.6	01 - Stewart - PBF	169.67	186.63	10%
CPUC 107.6	02 - Norwalk - PBF	148.69	163.55	10%
Stewart Norwa	ılk to Marathon			
CPUC 108.7	01 - Stewart - Sepulveda Vault	169.67	186.63	10%
CPUC 108.7	02 - Norwalk - Sepulveda Vault	148.69	163.55	10%

EXHIBIT D

Declaration in Support of Rate Increase

Declaration of Michael J. Webb

I. Introduction and Statement of Qualification

- My name is Michael J. Webb. I am Vice President with Regulatory Economics Group, LLC ("REG"), a consulting firm located in Reston, Virginia. My address is 11180 Sunrise Valley Drive, Reston, Virginia 20191. I hold a PhD and MA in Economics from George Mason University and a BA in Economics from American University. I have more than 25 years of experience in the oil pipeline industry. I have provided testimony before this Commission, the Federal Energy Regulatory Commission ("FERC"), the National Energy Board (Canada), the Canadian Energy Regulator, the Kansas Corporation Commission, the Regulatory Commission of Alaska, the Wyoming Public Service Commission, the Virginia State Corporation Commission, the Railroad Commission of Texas, the American Arbitration Association, the Pennsylvania Public Utilities Commission, the Louisiana Public Service Commission, the Court of Chancery of the State of Delaware, and the District Court for the 269th District of Texas. In these forums, my testimony has addressed a variety of issues relating to oil pipeline regulation. I have attached my curriculum vitae as Exhibit No. MJW-1.
- 2. I have been asked by Crimson California Pipeline L.P. ("Crimson") to provide a cost of service and an achieved return figure for its Southern California Pipeline System ("SoCal"). The purpose of these calculations is to demonstrate to the California Public Utilities Commission ("CPUC" or "Commission") that the request to increase rates by 10 percent, filed with this statement is reasonable.

3. An achieved return figure provides a way to calculate the return which a utility, such as SoCal, will earn at a given rate level. In the next section of my statement, I will present a summary of the elements used to calculate these figures. I will then present a cost of service and two achieved return figures (Exhibit No. MJW-2). The first will present the achieved return resulting from the currently effective rates and the second will present the achieved return that would result from a 10-percent increase.

II. Cost of Service and Achieved Return

- 4. On June 28, 2024, Crimson filed A.24-06-019, in which I calculated a cost of service which supported a 36.92 percent increase above the then effective rates, which were approved in Decision No. D.24-05-007. As part of A.24-06-019, on August 1, 2024, Crimson then increased the SoCal rates by 10 percent in accordance with P.U. Code Section 455.3
- 5. On April 21, 2025, ALJ LeQuang issued a ruling for Crimson to file additional information, stating:

"Remove CorEnergy's finances (including debt, reorganization costs, etc.) from Crimson's A.24-06-019 application and recalculate achieved returns. Crimson's inclusion of CorEnergy's finances goes against the holding in D.2212-032."

On May 15, 2025, in response to ALJ LeQuang's ruling, I calculated a modified cost of service which excluded all allocated expenses associated with CorEnergy Infrastructure Trust, Inc. ("CorEnergy").

This modified cost of service supports a rate increase of 26.35 percent above the rates approved in D.24-05-007, or 14.67 percent above the current rates which went into effect on August 1, 2024.¹

- 6. The cost of service and achieved return figures I rely on this application (attached as Exhibit No. MJW-2) are the same cost of service and achieved return figures I calculated in the May 15, 2025 response in the ongoing A.24-06-019 case. If the Commission approves that rate increase, then this application will become moot. Explanations of my assumptions regarding volumes, revenues, rate base, depreciation, and cost of capital, can be found in my original Declaration. Explanations of my assumptions regarding operating expenses can be found in my response Declaration.
- An achieved return calculation (Exhibit No. MJW-2) begins with the revenue generated by a given set of rates, subtracts costs of providing service, and divides the residual by the cost of the assets used to provide service. The figure, expressed as a percentage, is compared against various capital market metrics for comparable companies to determine if it is within the zone of reasonableness, presuming one is setting a cost-based rate. To the extent the achieved return generated by the current rates is significantly below the capital market metrics, it is appropriate to allow the utility to raise its rates to a level that will generate an achieved return aligned with these market metrics.
- 8. Exhibit No. MJW-2, Achieved Return, Line 13, Column [a] shows the achieved return if SoCal does not raise its rates at all, instead maintaining the rates approved in D.24-05-007. Under this scenario, SoCal would achieve an overall return on rate base of approximately

¹ SoCal has since raised its rates by 10%. (1 + 26.35%)/(1 + 10%) - 1 = 14.87%.

6.15 percent and an achieved return on equity of 2.25 percent, which is insufficient to

attract capital.

9. Exhibit No. MJW-2, Achieved Return, Line 17, Column [b] shows the achieved return

SoCal would earn if it raised its current rates by 10 percent. Under this scenario, SoCal

would earn an overall return on rate base of approximately 11.29 percent and an achieved

return on equity of 10.82 percent and thus would still be unable to attract capital. If the

rates are raised to the full 14.87 percent, the overall return on rate base of would be 13.80

percent and the achieved return on equity would be 14.99 percent.²

III. Conclusion

10. As shown in Exhibit No. MJW-2, Achieved Return, under its current rates SoCal will earn

an overall return on rate base of 6.15 percent in the Test Period; its achieved return on

equity will be 2.25 percent. This low return will be partially mitigated by the 10 percent

rate increase. Allowing the full 14.87 percent rate increase would allow Crimson to recover

its expenses and earn a reasonable return on capital. By contrast, without a rate increase,

its achieved return will fail to attract new investment, violating the central premise of

ratemaking.

The foregoing declaration is submitted under penalty of perjury in accordance with the

laws of the State of California.

Dated: June 30, 2025

/s/ Michael J. Webb Michael J. Webb

² The 14.99% achieved return on equity falls just short of my 15.00% recommended ROE due to tariff rates being rounded down to the nearest \$0.0001 after the 14.87% increase.

5065797.1



MICHAEL J. WEBB

Vice President

Dr. Webb has more than twenty-five years of energy industry experience. Dr. Webb has extensive experience in all aspects of pipeline rate regulation at the Federal and State levels, as well as international levels. He has filed expert testimony in numerous cases involving the calculation of cost-based rates. He has also prepared several applications for authority to charge market-based rates on interstate oil pipelines. He has filed testimony addressing issues of natural gas pipeline ratemaking and has been qualified as an expert in principles of natural gas rate making. He has prepared whitepapers and met with FTC Staff to gain approval for mergers on behalf of oil companies. Dr. Webb holds a PhD in economics from George Mason University in Fairfax, Virginia and has published in the journals Public Choice and Natural Gas & Electricity. His academic interests include applied microeconomics, industrial organization, and auction theory. He has taught courses in Law and Economics, the Economics of Regulation, and the Economics of Energy at the graduate and undergraduate level for sixteen years.

Relevant Experience

Testimony

Jun 17-18, 2025 Presented oral testimony and cross examination on behalf of SFPP, L.P. at the California Public Utilities Commission Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure, cost-allocation and the jurisdictional status of terminal operations. May 29, 2025 Filed Answering Testimony on behalf of Colonial Pipeline at FERC responding to testimony of ATMI in Docket No. No. OR22-5-001 addressing issues related to damages and economic theory. May 19, 2025 Submitted Rebuttal Testimony on behalf of Colonial Pipeline at FERC in Docket No. IS25-268-000 addressing issues of price formation. April 25, 2025 Submitted Supplemental Rebuttal Testimony on behalf of SFPP, L.P. before the California Public Utilities Commission in Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure, cost-allocation and the jurisdictional status of terminal operations.	•	
FERC responding to testimony of ATMI in Docket No. No. OR22-5-001 addressing issues related to damages and economic theory. May 19, 2025 Submitted Rebuttal Testimony on behalf of Colonial Pipeline at FERC in Docket No. IS25-268-000 addressing issues of price formation. April 25, 2025 Submitted Supplemental Rebuttal Testimony on behalf of SFPP, L.P. before the California Public Utilities Commission in Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure, cost-allocation and the	Jun 17-18, 2025	L.P. at the California Public Utilities Commission Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure, cost-allocation and the
FERC in Docket No. IS25-268-000 addressing issues of price formation. April 25, 2025 Submitted Supplemental Rebuttal Testimony on behalf of SFPP, L.P. before the California Public Utilities Commission in Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure, cost-allocation and the	May 29, 2025	FERC responding to testimony of ATMI in Docket No. No. OR22-
L.P. before the California Public Utilities Commission in Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure, cost-allocation and the	May 19, 2025	FERC in Docket No. IS25-268-000 addressing issues of price
	April 25, 2025	L.P. before the California Public Utilities Commission in Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure, cost-allocation and the



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Jan. 29, 2025	Filed a Verified Statement on behalf of San Pablo Bay in support of a 10 percent rate increase at the California Public Utilities Commission.
Dec. 20, 2024	Submitted an Affidavit at FERC in Support of the Reply Comments of the Designated Carriers in RM25-2-000 discussing the impact of oil pipeline rates on consumer prices.
Nov. 26, 2024	Submitted an Affidavit at FERC in Support of the Comments of the Designated Carriers in RM25-2-000 discussing issues related to the FERC's Income Tax Policy and statistical issues.
Oct. 23, 2024	Submitted Supplemental Declaration on behalf of Crimson California Pipeline L. P. in support of a rate increase for its Southern California Pipeline at the California Public Utilities Commission.
Oct. 7, 2024	Submitted Supplemental Direct Testimony on behalf of SFPP, L.P. before the California Public Utilities Commission in Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure and cost-allocation.
Jul. 26, 2024	Filed Cross-Answering Testimony on behalf of Colonial Pipeline at FERC responding to the testimony of FERC Trial Staff in Docket No. OR22-5-001
June 28, 2024	Submitted Verified Statement on behalf of Crimson California Pipeline L. P. in support of a rate increase for its Southern California Pipeline at the California Public Utilities Commission.
Feb 28, 2024	Oral Rebuttal Testimony and cross examination on behalf of the Board of Supervisors of Loudon County before the Virginia State Corporation Commission in Docket No. PUR-2023-00089 addressing regulatory issues associated with setting tolls for the privately owned Dulles Greenway.
Feb 8, 12, 2024	Oral cross examination at the California Public Utilities Commission on behalf of KLM and San Pablo Bay Pipeline in Docket No. A.22-7-015 <i>et. al.</i> discussing principles of cost-based ratemaking, and supporting the pipeline's rate increase.



Feb. 5, 2024	Submitted Rebuttal Testimony and Affidavit on behalf of Phillips 66 Pipeline LLC addressing issues related to cost-of-service calculations including return on equity, capital structure, and the application of the FERC's Opinion No. 154-B methodology in Docket Nos. IS21-747-000 and IS23-92-000 at the FERC.
Jan 25, 2024	Filed a Verified Statement on behalf of San Pablo Bay in support of a 10 percent rate increase at the California Public Utilities Commission.
Jan. 12, 2024	Filed Direct Testimony on behalf of the Board of Supervisors of Loudon County before the Virginia State Corporation Commission in Docket No. PUR-2023-00089 addressing regulatory issues associated with setting tolls for the privately owned Dulles Greenway.
Dec. 29, 2023	Filed Rebuttal Testimony at the California Public Utilities Commission on behalf of KLM and San Pablo Bay Pipeline in Docket No. A.22-7-015 <i>et. al.</i> discussing principles of cost-based ratemaking, and supporting the pipeline's rate increase.
Nov. 7, 2023	Filed a Verified Statement in support of emergency rate relief at the California Public Utilities Commission in Docket No. A.22-7-015 et al.
Sept. 8, 2023	Filed Direct Testimony on behalf of KLM and San Pablo Bay Pipeline in Docket No. A.22-7-015 et. al. discussing principles of cost-based ratemaking, and supporting the pipeline's rate increase at the California Public Utilities Commission.
Jul. 19-20, 2023	Oral testimony and cross examination on behalf of Crimson California Pipeline L.P. in Docket Nos. A-22-06-017 and A-22-03-013 discussing principles of cost-based ratemaking, and supporting the pipeline's rate increase.
Jun. 29, 2023	Submitted Verified Statement on behalf of Crimson California Pipeline L. P. in support of a 10 percent rate increase for its Southern California Pipeline at the California Public Utilities Commission.
May 15, 2023	Submitted Supplemental Rebuttal Testimony on behalf of Crimson California Pipeline L.P. in Docket Nos. A-22-06-017 and A-22-03-013 discussing principles of cost-based ratemaking, and supporting the pipeline's rate increase.



Mar. 17, 2023	Submitted Direct Testimony on behalf of Crimson California Pipeline L.P. in Docket No. A22-07-015 discussing cost-based ratemaking principles and supporting the rate increase of the KLM pipeline.
Mar. 10, 2023	Submitted Direct Testimony and Affidavit on behalf of Phillips 66 Pipeline LLC addressing issues related to cost-of-service calculations including return on equity, capital structure, and the application of the FERC's Opinion No. 154-B methodology in Docket Nos. IS21-747-000 and IS23-92-000 at the FERC.
Mar. 3, 2023	Submitted Verified Statement on behalf of Crimson Company California Pipeline, L.P. regarding its KLM System before the California Public Utilities Commission in addressing the cost of service, cost of capital and achieved return supporting the applicant's rate increase.
Jan. 27, 2023	Submitted Verified Statement on behalf of San Pablo Bay Pipeline Company before the California Public Utilities Commission in addressing the cost of service, cost of capital and achieved return supporting the applicant's rate increase.
Jan. 3, 2023	Submitted and Affidavit on behalf of Phillips 66 Pipeline LLC addressing issues related to cost-of-service calculations including return on equity, capital structure, and the application of the FERC's Opinion No. 154-B methodology in Docket No. IS23-92-000.
Dec. 23, 2022	Submitted Rebuttal Testimony on behalf of Crimson California Pipeline L.P. in Docket Nos. A-22-06-017 and A-22-03-013 discussing principles of cost-based ratemaking, and supporting the pipeline's rate increase.
Sept. 13, 2022	Submitted Direct Testimony on behalf of Crimson California Pipeline L.P. in Docket No. A-22-06-017 discussing principles of cost-based ratemaking, and supporting the pipeline's rate increase.
Aug. 24, 2022	Submitted Verified Statement on behalf of Crimson California Pipeline L.P. in Docket No. A-20-06-010 responding to questions raised by ALJ and supporting the pipeline's rate increase.
Aug. 6, 2022	Submitted Testimony on behalf of Crimson California Pipeline L.P. in Docket No. A-22-03-013 regarding surcharge to implement AB-864 safety measures.



Jul. 29, 2022	Submitted Declaration on behalf of San Pablo Bay Pipeline Company and KLM Pipeline Company before the California Public Utilities Commission in addressing the cost of service, cost of capital and achieved return supporting the applicant's rate increase.
Jun. 30, 2022	Submitted Declaration on behalf of Southern California Pipeline System before the California Public Utilities Commission in addressing the cost of service, cost of capital and achieved return supporting the applicant's rate increase.
Nov. 19, 2021	Submitted Rebuttal Testimony on behalf of SFPP, L.P. before the California Public Utilities Commission in Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure and cost-allocation.
Oct. 1, 2021	Submitted Direct Testimony on behalf of SFPP, L.P. before the California Public Utilities Commission in Docket No. A.21-01-015 addressing issues related to risk, return on equity cost-of-debt and capital structure.
Sep. 20, 2021	Submitted an Affidavit on behalf of Phillips 66 Pipeline LLC addressing issues related to cost-of-service calculations including return on equity, capital structure and the application of the FERC's Opinion No. 154-B methodology.
Jun. 30, 2021	Submitted Declaration on behalf of KLM Pipeline System before the California Public Utilities Commission in addressing the cost of service, cost of capital and achieved return supporting the applicant's rate increase.
Jun. 30, 2021	Submitted Declaration on behalf of Southern California Pipeline System before the California Public Utilities Commission in addressing the cost of service, cost of capital and achieved return supporting the applicant's rate increase.
Jun. 10, 2021	Direct Testimony and Cross Examination on behalf of Cenovus Energy, Inc. before the Canada Energy Regulator ("CER") in Docket for S.C. 2019, c 28, s. 10 regarding the Application of Enbridge Inc. requesting approval of tolling structure involving contract tolls on its Mainline.
May 28, 2021	Submitted Declaration on behalf of San Pablo Bay Pipeline Company before the California Public Utilities Commission in



addressing the cost of service, cost of capital and achieved return supporting the applicant's rate increase.

- Feb. 21-22, 2021 Direct Testimony and Cross Examination on behalf of Bandera Master Fund LP et al in the Court of Chancery of the State of Delaware Docket No. 2018-0372-JTL addressing issues related to issues of FERC ratemaking.
- Dec. 7, 2020 Submitted Evidence at the request of Cenovus Energy, Inc. before the Canada Energy Regulator ("CER") in Docket for S.C. 2019, c 28, s. 10 regarding the Application of Enbridge Inc. requesting approval of tolling structure involving contract tolls on its Mainline. The Evidence recommended a methodology to employ to assess whether the tolls would be just and reasonable and consistent with the public interest.
- Nov. 10, 2020 Submitted Affidavit on behalf of SFPP, L.P. at the Federal Energy Regulatory Commission responding to issues rates by FERC Trial Staff and Complainants in Docket No. OR16-6-000 addressing issues related to adjustments to the calculation of the Return on Equity.
- Oct. 26, 2020 Oral Testimony on behalf of Colonial Pipeline Company in Docket No. OR18-7-002 addressing the proper methodology to employ in allocating cost between jurisdictional and non-jurisdictional services and issues related to depreciation.
- Oct. 19, 2020 Submitted Affidavit on behalf of SFPP, L.P. at the Federal Energy Regulatory Commission in Docket No. OR16-6-000 addressing issues related to adjustments to the calculation of the Return on Equity.
- Oct. 16, 2020 Submitted Rebuttal Expert Report on behalf of Bandera Master Fund LP et al in the Court of Chancery of the State of Delaware Docket No. 2018-0372-JTL addressing issues related to issues of FERC ratemaking.
- Sept. 11, 2020 Submitted Expert Report on behalf of Bandera Master Fund LP et al in the Court of Chancery of the State of Delaware Docket No. 2018-0372-JTL addressing issues related to issues of FERC ratemaking.
- Sept. 11, 2020 Submitted Affidavit on behalf of The Designated Carriers in Docket No. AD20-10-000 responding to issues raised by certain shipper comments regarding the appropriate factors to employ in calculating the Index the FERC applies to adjust oil pipeline rates.



Aug. 17, 2020 Submitted Affidavit on behalf of The Designated Carriers in Docket No. AD20-10-000 regarding the appropriate factors to employ in calculating the Index the FERC applies to adjust oil pipeline rates.

Aug. 13-14, 2020 Provided oral sur-rebuttal testimony and subject to cross examination on behalf of the Board of Supervisors of Loudon County in Docket No. PUR-2019-00218 addressing regulatory issues associated with setting tolls for the privately owned Dulles Greenway.

Jul. 10, 2020 Submitted Direct Testimony on behalf of Williams MLP Operating LLC and Mockingbird Midstream Gas Services, LLC before the Railroad Commission of Texas in Docket No. GUD-10606 addressing regulatory economics issues associated with price discrimination.

Jun. 26, 2020 Submitted Direct Testimony on behalf of the Board of Supervisors of Loudon County before the State Corporation Commission in Docket No. PUR-2019-00218 addressing regulatory issues associated with setting tolls for the privately owned Dulles Greenway.

May 12-18, 2020 Oral testimony and cross examination on behalf of MPLX Ozark Pipe Line, LLC in Docket No. OR19-14-000 addressing issues related to product and destination markets and HHI calculations.

Apr. 8, 2020 Filed Rebuttal Testimony on behalf of MPLX Ozark Pipe Line, LLC in Docket No. OR19-14-000 addressing issues related to product and destination markets and HHI calculations.

Feb. 20, 2020 Filed Cross-Answering Testimony on behalf of Colonial Pipeline Company in Docket No. OR18-7-002 addressing the proper methodology to employ in allocating cost between jurisdictional and non-jurisdictional services and the economic life to use in depreciation calculations.

Nov. 20, 2019 Filed Answering Testimony on behalf of Colonial Pipeline Company in Docket No. OR18-7-002 addressing the proper methodology to employ in allocating cost between jurisdictional and non-jurisdictional services.



Sep 13, 2019	Filed Supplemental Direct Testimony on behalf of MPLX Ozark Pipe Line, LLC addressing issues related to product and destination markets and HHI calculations in Docket No. OR19-14-000.
Aug. 13, 2019	Filed an affidavit on behalf of Buckeye Pipeline Company, L.P. regarding the calculation of a substantial change in economic circumstances under the Energy Policy Act of 1992, in Docket No. OR19-26-000.
Jul. 5, 2019	Filed an affidavit on behalf of Buckeye Pipeline Company, L.P. regarding the justness and reasonableness of rates it charges to transport jet fuel to the New York City Airports, in Docket No. OR19-26-000.
Jun. 26, 2019	Filed an affidavit on behalf of the Association of Oil Pipe Lines discussing issues related to the calculation of the cost of capital in Docket No. PL19-4-000.
Jun. 19, 2019	Filed an affidavit on behalf of SFPP, L.P. discussing methodology employed to calculate cost of capital used in SFPP's Page 700 in Docket No. IS19-508-000.
Mar. 27, 2019	Filed an affidavit on behalf of MPLX Ozark Pipe Line, LLC addressing issues related to product and destination markets and HHI calculations in Docket No. OR19-14-000.
Mar. 20-21, 2019	Oral testimony and cross examination on behalf of White Cliffs Pipeline. LLC at the Federal Energy Regulatory Commission in Docket No. OR18-9-000 addressing issues related to market power.
Jan. 22, 2019	Filed Rebuttal testimony on behalf of White Cliffs Pipeline. LLC at the Federal Energy Regulatory Commission in Docket No. OR18-9-000 addressing issues related to market power.
Dec. 21, 2018	Filed Direct testimony on behalf of MPLX Ozark Pipe Line, LLC addressing issues related to product and destination markets and HHI calculations in Docket No. OR19-14-000.
Sept. 10, 2018	Filed an affidavit on behalf of SFPP, L.P addressing issues related to rates deemed just and reasonable by the Energy Policy Act of 1992 in Docket No. OR11-13-000 <i>et al.</i>



Aug. 7, 2018	Filed affidavit on behalf of SFPP, L.P. in support of motion to reopen the record with regard to issues related to the impact of the Commission's Policy Statement on Income Tax Allowance in Docket No. IS08-390-000 et al.
Jul. 30, 2018	Filed Supplemental Direct Testimony on behalf of White Cliffs Pipeline, L.L.C. containing a market power analysis in support of White Cliffs' application for authorization to charge market-based rates in Docket No. OR18-9-000
Jul. 11, 2018	Filed affidavit on behalf of SFPP, L.P. explaining the basis for eliminating ADIT for a MLP that is not entitled to a tax allowance in Docket Nos. IS08-390-000 et al.
Jun. 14, 2018	Filed Prepared Supplement Direct Testimony on behalf of West Texas LPG Pipeline Limited Partnership ("WTXP") addressing issues related to market power analyses in support of WTXP's application for authorization to charge market-based rates in Docket No. OR17-19-000.
May 2, 2018	Filed Prepared Supplemental Direct Testimony on behalf of Wood River Pipe Lines LLC that contains a market power analyses in support of Wood River's application for authorization to charge market-based rates in Docket No. OR17-11-000.
Apr. 9, 2018	Filed affidavit in support of the answer of Buckeye Pipeline Company, L.P. to the protest of various shippers to the tariff filing on Buckeye's Eastern Products System in Docket No. IS18-229-000.
Apr. 9, 2018	Filed affidavit in support of the answer of Buckeye Pipeline Company, L.P. to the protest of various shippers to the tariff filing on Buckeye's Midwest Products System in Docket No. IS18-230-000.
Mar. 22, 2018	Filed affidavit in support of the answer of White Cliffs Pipeline, L.L.C. to Protest of the Liquids Shippers Group to application of White Cliffs Pipeline, LLC's request for market-based ratemaking authority.
Dec. 22, 2017	Filed affidavit in support of the request for rehearing of Plains Marketing, L.P. discussing pricing dynamics in the crude petroleum market.



Dec. 21, 2017	Prepared Direct Testimony on behalf of White Cliffs Pipeline, L.L.C. in support of application for Market-Based Ratemaking Authority at the Federal Energy Regulatory Commission in Docket No. OR18-8-000.
Nov. 7, 2017	Cross Examination on behalf of Laurel Pipe Line Company, L.P. at the Pennsylvania Public Utilities Commission in Docket No. A- 2016-2575829 supporting Laurel's request to make operational changes to its pipeline service.
Nov. 1, 2017	Filed Supplemental Rejoinder testimony on behalf of Laurel Pipe Line Company, L.P. at the Pennsylvania Public Utilities Commission in Docket No. A-2016-2575829 supporting Laurel's request to make operational changes to its pipeline service.
Oct. 6, 2017	Filed Rejoinder testimony on behalf of Laurel Pipe Line Company, L.P. at the Pennsylvania Public Utilities Commission in Docket No. A-2016-2575829 supporting Laurel's request to make operational changes to its pipeline service.
Aug. 31, 2017	Filed Rebuttal testimony on behalf of Laurel Pipe Line Company, L.P. at the Pennsylvania Public Utilities Commission in Docket No. A-2016-2575829 supporting Laurel's request to make operational changes to its pipeline service.
Aug. 28, 2017	Filed Rebuttal Expert Witness Statement in Suburban Heating Oil Partners, LLC v. Buckeye Terminals LLC before the American Arbitration Association Case No. 01-16-0003-4900 involving the calculation of damages for alleged breach of contract.
Aug. 7, 2017	Filed affidavit on behalf of Wood River Pipe Line, LLC responding to Protest of the application for Market-Based Ratemaking Authority at the Federal Energy Regulatory Commission in Docket No. OR17-11-000.
Jul. 20, 2017	Cross Examination in Suburban Heating Oil Partners, LLC v. Buckeye Terminals LLC before the American Arbitration Association Case No. 01-16-0003-4900 involving the calculation of damages for alleged breach of contract.
Jun. 26, 2017	Filed Rebuttal Expert Witness Statement in Suburban Heating Oil Partners, LLC v. Buckeye Terminals LLC before the American Arbitration Association Case No. 01-16-0003-4900 involving the calculation of damages for alleged breach of contract.



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Jun. 19, 2017	Filed Expert Witness Statement in Suburban Heating Oil Partners, LLC v. Buckeye Terminals LLC before the American Arbitration Association Case No. 01-16-0003-4900 involving the calculation of damages for alleged breach of contract.
Jun. 1, 2017	Filed a Verified Statement at the CPUC on behalf of Crimson California Pipeline L.P. supporting its request for a rate increase for its KLM Pipeline System.
May 5, 2017	Filed Direct testimony on behalf of Wood River Pipe Line, LLC in support of application for Market-Based Ratemaking Authority at the Federal Energy Regulatory Commission in Docket No. OR17-11-000.
Mar. 8, 2017	Oral testimony and cross examination of Crimson Pipeline, L.P. at the California Public Utilities Commission in Docket No. A.16-03-009 addressing issues related to cost of capital, risk and the use of the cost-of-service methodology in assessing whether rates are just and reasonable.
Feb. 7, 2017	Filed Direct testimony on behalf of Laurel Pipe Line Company, L.P. at the Pennsylvania Public Utilities Commission in Docket No. A-2016-2575829 supporting Laurel's request to make operational changes to its pipeline service.
Feb. 3, 2017	Filed 2 nd Supplemental Rebuttal Testimony on behalf of West Texas LPG Pipeline Limited Partnership at the Railroad Commission of Texas in GUD No. 10455 regarding the calculation of cost-based rates in the presence of competition.
Feb. 2, 2017	Oral testimony and cross examination in on behalf of SFPP, L.P. at the Federal Energy Regulatory Commission in Docket No. OR16-6-000 addressing issues related to cost of capital, risk, and billing determinants used to set cost-based rates for SFPP.
Jan. 16, 2017	Filed Rebuttal Testimony on behalf of Crimson Pipeline, L.P. at the California Public Utilities Commission in Docket No. A.16-03-009 addressing issues related to cost of capital, risk and the use of the cost-of-service methodology in assessing whether rates are just and reasonable.
Oct. 28, 2016	Filed Prepared Answering Testimony in response to Commission Trial Staff on behalf of SFPP, L.P. at the Federal Energy Regulatory Commission in Docket No. OR16-6-000 addressing issues related to the cost of capital.



Oct. 21, 2016	Filed Supplemental Rebuttal Testimony on behalf of West Texas LPG Pipeline Limited Partnership at the Railroad Commission of Texas in GUD No. 10455 regarding the calculation of cost-based rates in the presence of competition.
Oct. 18, 2016	Filed Prepared Answering Testimony in response to Commission Trial Staff on behalf of SFPP, L.P. at the Federal Energy Regulatory Commission in Docket No. OR16-6-000 addressing issues related to test period volumes and market evaluation.
Sep. 19, 2016	Filed Affidavit on behalf of Enterprise TE Products Pipeline Company, LLC in Docket No. OR16-23-000, addressing issues related to cost-of-service and cost-allocation.
Sep. 16, 2016	Filed Rebuttal Testimony on behalf of West Texas LPG Pipeline Limited Partnership at the Railroad Commission of Texas in GUD No. 10455 regarding economic theory underpinning the analysis of market rates.
Aug. 17, 2016	Filed Direct Testimony on behalf of Crimson Pipeline, L.P. at the California Public Utilities Commission in Docket No. A.16-03-009 addressing issues related to cost of capital, risk and the use of the cost-of-service methodology in assessing whether rates are just and reasonable.
Aug. 12, 2016	Filed Answering Testimony on behalf of SFPP, L.P. at the Federal Energy Regulatory Commission in Docket No. OR16-6-000 addressing issues related to cost of capital, risk, and billing determinants used to set cost-based rates for SFPP.
Aug. 1, 2016	Filed Direct Testimony in support of the application for market-based ratemaking authority of Buckeye Linden Pipe Line Company LLC.
Jul. 25, 2016	Provided Verified Statement on behalf of Crimson Pipeline, L.P. at the California public Utilities Commission in Docket No. A.16-03- 009 addressing issues raised by shippers in response to request for emergency rate relief
Jun. 15, 2016	Provided Verified Statement on behalf of Crimson Pipeline, L.P. at the California public Utilities Commission in Docket No. A.16-03-009 regarding the need for emergency rate relief.
Mar. 11, 2016	Provided Testimony on behalf of Crimson Pipeline, L.P. at the California Public Utilities Commission in Docket No. A.16-03-009 regarding achieved return and cost of capital



Oct. 8, 2015	Presented Oral Testimony on behalf of Buckeye Pipe Line Company, L.P. at FERC in Docket No. OR14-4-000 responding to testimony regarding the competitive status of certain markets served by the carrier
Jul. 1, 2015	Provided Testimony on behalf of Newfield Production Company at the 269th District Court in Case No. 201534624 regarding FERC process and principles related to committed rates
Jun. 26, 2015	Filed Prepared Answering Testimony on behalf of Buckeye Pipe Line Company, L.P. at FERC in Docket No. OR14-4-000 responding to testimony regarding the competitive status of certain markets served by the carrier
May 15, 2015	Filed Prepared Rebuttal Testimony on behalf of Zydeco Pipeline Company LLC at FERC in Docket No. IS14-607-000 et al responding to overhead cost allocation, rate design and cost of capital related issues
Mar. 24-27, 2015	Presented Oral Testimony at FERC on behalf of Buckeye Pipe Line Company, L.P. in Docket No. OR12-28-001 regarding economic principles of cost allocation and evaluation of allocation methodology
Jan. 20, 2015	Filed Prepared Answering Testimony at FERC on behalf of Buckeye Pipe Line Company, L.P. in Docket Nos. OR14-4-000 et al. regarding analyses underlying a market power determination
Dec. 19, 2014	Filed Prepared Answering Testimony Responding to Commission Trial Staff at FERC on behalf of Buckeye Pipe Line Company, L.P. in Docket No. OR12-28-001 regarding economic principles of cost allocation and evaluation of allocation methodology
Dec. 15, 2014	Filed Direct Testimony at FERC on behalf of Zydeco Pipeline Company LLC in Docket No. IS14-607-000 et al discussing regarding cost allocation and cost of capital issues
Oct. 7, 2014	Filed Prepared Answering Testimony on behalf of Buckeye Pipe Line Company, L.P. at FERC in Docket No. OR12-28-001 regarding economic principles of cost allocation and evaluation of allocation methodology
Aug. 7, 2014	Filed Rebuttal Written Evidence at the Canadian National Energy Board on behalf of Shell Trading Canada on matters regarding apportionment methodologies in Hearing Order RHW-001-2013



Jul. 27, 2014	Filed Affidavit on behalf of SFPP, L.P. in Docket No. OR14-35 regarding the efficiency of the FERC's indexing methodology
Jun. 4, 2014	Filed Direct Testimony at FERC on behalf of Shell Pipeline Company, L.P. in Docket No. IS14-104-000 et al. discussing regarding cost allocation and cost of capital issues
Apr. 25, 2014	Filed Direct Written Evidence at the Canadian National Energy Board on behalf of Shell Trading Canada on matters regarding apportionment methodologies in Hearing Order RHW-001-2013
Nov. 12-14, 2013	Presented oral testimony, cross examination before the Virginia State Corporation Commission regarding cost-of-service and rate design issues for a private toll road in PUE-2013-00011
Nov. 4, 2013	Filed Affidavit at FERC on behalf of Buckeye Pipeline Company, L.P. in Docket No. OR14-4 in support of its motion to dismiss
Oct. 15, 2013	Filed Rebuttal testimony at the Virginia State Corporation Commission regarding cost-of-service regulation and ratemaking issues in Case No. PUE-2013-00011
Sept. 23, 2013	Filed prepared testimony at the Regulatory Commission of Alaska on behalf of BP Pipelines (Alaska) Inc. calculating a cost-based rate and providing theoretical support in Docket No. TL143-311
Apr. 30, 2013	Submitted Joint Expert Report to the Virginia State Corporation Commission regarding cost-of-service regulation and ratemaking issues in Case No. PUE-2013-00011
Apr. 29, 2013	Presented oral testimony and cross examination at the California Public Utilities Commission on behalf of SFPP, L.P. discussing theoretical principles of cost allocation with regard to Application No. 09-05-014
Dec. 12, 2012	Filed Rebuttal Testimony at FERC on behalf of Enterprise TE Products Pipeline Company LLC in Docket No. IS12-203-000 on matters relating to rate design and cost-of-capital
Nov. 5, 2012	Filed Direct Testimony at the California Public Utilities Commission on behalf of SFPP, L.P. discussing theoretical principles of cost allocation with regard to Application No. 09-05-014
Oct. 10, 2012	Filed Verified Statement at FERC on behalf of Buckeye Pipeline Company, L.P. in Docket No. OR12-28-000 regarding the justness and reasonableness of the pipeline's rates



Jul. 18, 2012	Filed Affidavit at FERC on behalf of Association of Oil Pipe Lines in Docket No. OR12-4-000 on issues related to assessing competition in the context of applications for market-based ratemaking authority
Jul. 16, 2012	Filed Reply Verified Statement at FERC on behalf of Buckeye Pipeline Company, L.P. in Docket No. IS12-185-000
Jul. 9, 2012	Filed Prepared Direct Testimony at FERC on behalf of Enterprise TE Products Pipeline Company LLC in Docket No. IS12-203-000 on matters relating to rate design and cost-of-capital
May 15, 2012	Filed Verified Statement at FERC on behalf of Buckeye Pipeline Company, L.P. in Docket No. IS12-185-000 addressing issues related to ratemaking in the context of the company's ratemaking program
Apr. 18-20, 2012	Presented oral testimony and responded to questions of Commissioners at the Public Service Commission of the State of Wyoming on behalf of Belle Fourche Pipeline Company in Docket no. 50000-61-PR-11 on issues related to cost-of-service and cost-of-capital
Feb. 1, 2012	Filed Supplement Direct Testimony at the Public Service Commission of the State of Wyoming on behalf of Belle Fourche Pipeline Company in Docket No. 50000-61-PR-11 on issues related to cost-of-service and cost of capital
Jan. 10-11, 2012	Presented Oral Testimony and cross examination at the FERC on behalf of Enbridge Pipelines (Southern Lights) LLC in Docket Nos. IS10-399-000 et al. on issues related to cost-of-service and rate design
Jan. 9, 2012	Filed Supplemental Direct Testimony at FERC on behalf of SFPP, L.P. in Docket No. IS11-444-001 revising calculations to accord with Commission's new cost-of service ruling
Jan. 6, 2012	Filed Rebuttal Testimony before the State Corporation Commission of the State of Kansas on behalf of Mid-America Pipeline Company, LLC in Docket No. 12-MDAP-068-RTS on issues related to cost-of-service and rate design
Dec. 13, 2011	Filed Direct Testimony at FERC on behalf of SFPP, L.P. in Docket No. IS11-444-001 regarding the proposed indexation of pipeline



	rates and the economic principles of the Commission's indexing methodology
Nov. 1, 2011	Filled Rebuttal Testimony at the Federal Regulatory Commission on behalf of Enbridge Pipelines (Southern Lights) LLC in Docket Nos. IS10-399-000 <i>et al.</i> on issues related to cost-of-service and rate design
Oct. 25, 2011	Filed Affidavit on behalf of Mid-America Pipeline Company, LLC before the State Corporation Commission of the State of Kansas in Docket No. 12-MDAP-068-RTS in support of a Motion to Compel
Oct. 14, 2011	Filed Direct Testimony before the Public Service Commission of the State of Wyoming on behalf of Belle Fourche Pipeline Company in Docket No. 50000-61-PR-11 on issues related to cost- of-service and cost-of-capital
Aug. 19, 2011	Filed Direct Testimony before the State Corporation Commission of the State of Kansas on behalf of Mid-America Pipeline Company, LLC in Docket No. 12-MDAP-068-RTS on issues related to cost-of-service and rate design
Jun. 7, 2011	Filed Direct Testimony at FERC on behalf of Enbridge Pipelines (Southern Lights) LLC in Docket Nos. IS10-399-000, et al. on issues related to cost-of-service and rate design
Jul. 2, 2010	Presented oral cross examination of behalf of SFPP, L.P. addressing issues associated with cost allocation and volume projections in Docket No. IS09-437
May 14, 2010	Filed Rebuttal Testimony on behalf of SFPP, L.P. addressing issues associated with cost allocation, and volume projections in Docket No. IS09-437
May 10-11, 2010	Presented oral cross examination behalf of San Pablo Bay Pipeline Company, LLC at the California Public Utility Commission supporting its Application for market based rates in Docket No. A.08-09-024
Apr. 15, 2010	Filed Direct Testimony on behalf of Kuparuk Transportation Company on cost of service issues before the Regulatory Commission of Alaska
Feb. 23-24, 2010	Presented oral Testimony on behalf of SFPP, L.P. at the California

Public Utilities Commission addressing issues associated with



	competition, sound regulatory policy, and macro-economic conditions in Docket No. 09-05-014
Feb. 8, 2010	Filed Rebuttal Testimony on behalf of San Pablo Bay Pipeline Company LLC in Docket No. A-08-09-024 addressing issues related to competitive analysis of its markets
Jan. 25, 2009	Filed Rebuttal Testimony on behalf of SFPP, L.P. at the California Public Utilities Commission addressing issues associated with competition, sound regulatory policy and macro-economic conditions in Docket No. A. 09-05-014
Dec. 29, 2009	Filed Verified Statement on behalf of San Pablo Bay Pipeline, LLC supporting Motion to Compel in Docket No. A 08-09-024
Dec. 11, 2009	Filed Direct Testimony on behalf of SFPP, L.P. addressing issues associated with cost-allocation, and volume projections in Docket
Sept. 21, 2009	No. IS09-437 Filed Affidavit supporting SFPP, L.P.'s Petition for Rehearing in Docket No. IS09-437
Jun. 26, 2009	Presented Oral Sur-rebuttal testimony on behalf of SFPP, L.P. addressing issues associated with volume projections and economic conditions
Jun. 18-19, 2009	Presented Oral Testimony on behalf of SFPP, L.P. at FERC in Docket No. IS08-390-002 addressing issues discussed in prepared Direct and Rebuttal Testimony
Mar. 27, 2009	Filed Rebuttal Testimony at FERC discussing cost-allocation, depreciation, and the economic conditions associated with demand for refined petroleum products in SFPP's destination market
Jan. 13, 2009	Filed Sworn Declaration on behalf of San Pablo Bay Pipeline, LLC supporting its Response to Tesoro's Motion for Summary Adjudication in Docket No. A.08-09-024
Dec. 2-4, 2008	Presented Oral Testimony on behalf of SFPP, L.P. at FERC addressing theoretical issues related to allocation of cost and the economic life of the pipeline
Oct. 16, 2008	Filed Direct Testimony at FERC on behalf of SFPP, L.P. in Docket No. IS08-390-002 discussing theoretical principles of cost allocation



Sept. 30, 2008	Filed Direct Testimony on behalf of San Pablo Bay Pipeline Company LLC at the California Public Utilities Commission in Docket No. A.08-09-024 supporting its market based rates and examining the competition in origin and destination markets using conventional measures of market concentration and competition
Sept. 9, 2008	Filed Answering Testimony at FERC on behalf of SFPP, L.P. in Docket No. OR03-5-000, discussing theoretical issues associated with cost-allocation and the economic life of the pipeline
Jul. 6, 2007	Filed Affidavit at FERC in support of a motion for rehearing of Frontier Pipeline Company in Docket No. OR01-2-000 and OR01-4-000 discussing calculation of refunds owed by Frontier.

Rate Regulation Issues

- Led the project team in developing data and preparing cost-of-service calculation in cost-based rate cases. Assisted multiple witnesses in drafting testimony regarding FERC requirements for cost-based ratemaking.
- Prepared cost-of-service filings, consistent with FERC regulations in 18 CFR §
 346.2 on behalf of numerous oil pipelines.
- Assisted counsel in preparing cross examination regarding cost-based ratemaking and regulatory theory.
- Assisted multiple witnesses in drafting testimony presenting Stand-Alone Cost theory to the FERC.

Contract and Investor Disputes

- Provided expert testimony on behalf of an investor class before the Court of Chancery of the State of Delaware that was favorably cited by the Court in finding liability and damages to the investor class in excess of \$800 million.
- Developed complex economic models to demonstrate that a lease between a joint venture operator and an affiliate had been conducted at arms-length and did not represent self-dealing, resulting in a favorable settlement for the client.
- Led a multi-witness project team opposing a claim of damages in a liquids terminal dispute, resulting in a finding of no damages for the client.



Antitrust Matters

- o Prepared a whitepaper for the Federal Trade Commission analyzing the competitive impact of a pipeline acquisition in the Eastern Pennsylvania area.
- Developed a computer-based model to analyze the competitive impact of an oil pipeline acquisition in the mid-continent region. Prepared a detailed whitepaper explaining the theory behind the analysis and the results of the analysis. Met with FTC Staff to discuss the results of the analysis.
- O Analyzed the competitive impact of a refinery acquisition in the northeastern United States. Constructed a computer-based simulation based on publicly available data and an analysis of how the acquisition would impact the market. Prepared multiple whitepapers reporting results of the analysis. Met with FTC Staff to discuss the results of the analysis.

Market-Based Rate Filings

- Assisted in the preparation of an application for market-based ratemaking authority and associated exhibits consistent with 18 CFR § 348 on behalf of Sunoco Pipeline, LP's market-based rate filing.
- Assisted in the preparation of expert testimony and exhibits filed in Shell Pipe
 Line Company LP in market-power case.
- Participated in the development of applications for market-based ratemaking authority on behalf of Chase Pipeline Company, Inc. West Shore Pipeline Company, Inc, and Marathon-Ashland Pipe Line LLC.

Acquisition Due Diligence

- o Participated in a project team analyzing the regulatory risk that a private equity fund faced if it acquired a controlling interest in liquids.
- o Participated in a project team analyzing the regulatory risk that a pipeline company considering a conversion in ownership structure from a corporation to a master limited partnership could face if its rates were contested by its shippers.

Involvement in Prior Regulatory Matters

FERC Matters

OR03-5-001	Complaint against the rates of SFPP's North Line and

Oregon Line

IS05-216-000 Protest against the rates of Mid-America Pipeline



IS05-82-000, IS06-01-000	Protest and Complaint against TAPS CARRIERS rates
OR05-7-000	Sunoco Logistics Partners, L.C. Market Based Rate filing
OR96-2-000	Protest and complaint against SFPP's Sepulveda pipeline system
OR05-1-000	Petition for Declaratory Order Filed by Enbridge's Spearhead pipeline
OR01-2-000	Calculating reparations owed by Frontier to Big West and Chevron
OR02-10-000	Shell Pipe Line Company, LP application for market-based ratemaking authority
IS02-384-000	Protest and Complaint against Platte Pipe Line Company and Express Pipeline Company, LLC
OR96-2-000	Complaint against SFPP's rates
OR01-06-000	Application of West Shore Pipe Line Company for market-based ratemaking authority
OR01-03-000, OR01-05-000	Complaint against the rates of Anschutz Ranch East Pipeline Inc.
OR01-02-000, OR01-04-000	Complaint against the rates of Frontier Pipeline Company
OR01-1-000	Application of Chase Transportation Company for market-based ratemaking authority
OR00-1-000	Application of Marathon-Ashland Pipe Line, LLC for market-based ratemaking authority
State Matters	
PUR-2019-00218	Application of Toll Road Investors Partnership II, L.P. for Authorization for an Increase in the Maximum Level of Tolls at the Commonwealth of Virginia State Corporation Commission



P-03-4	Protest and complaint at the Regulatory Commission of Alaska against the rates of the TAPS Carriers
TO-01147	Protest against Olympic Pipe Line Company, Inc's rate increase at the Washington Utilities and Telecommunications Commission
P97-4 and P97-7	Protest and complaint at the Regulatory Commission of Alaska against the rates of the TAPS Carriers
TX 1999-00532	Challenge to Arizona tax court's determination that SFPP's property should be valued at other than original cost

Other Entities

Docket No. 42084	Analyzing the return of Valero's ammonia pipeline
Civ No. 96-Z-2451	Challenge to the rates charged by a CO ₂ Pipeline in Federal District Court
Case No. 70 198 00294-99	Challenge to a pro-rationing policy of Amoco Oil Company filed before the American Arbitration Association

Publications and Presentations

"Allocating Pipeline Capacity and Priority Service" Presented at the 2018 Annual Business Conference of the Association of Oil Pipe Lines

"State Regulation" Presented at the 2019 and 2018 Annual Business Conference of the Association of Oil Pipe Lines

"Market-Based Rates" Presented at the 2017, 2016, 2015, 2014, 2013, and 2012 Annual Business Conference of the Association of Oil Pipe Lines

"Allocating Pipeline Capacity: Navigating Shipper Issues in Priority Service and Proration Policies" Presented at the 2018 Annual Business Conference of the Association of Oil Pipelines

"Introduction to FERC Ratemaking" Presented at the 2022-2011 Annual Business Conference of the Association of Oil Pipe Lines



"Cost of Service Concepts" Presented at the 2022, 2021, 2019 2016, 2015 Annual Business Conference of the Association of Oil Pipe Lines

"Pipeline Update" Presented at the November 2014 Mexican Energy Infrastructure Symposium

Webb, M.J and Williams, J.C "Price Regulation Allowing NGL Pipelines to Adjust to Current Conditions" Natural Gas & Electricity (August 2013) 17-22

Presentation at EUCI regarding all aspects of ratemaking for the liquid pipeline industry, December 2012

"Regulatory Basics for Oil Pipelines" Presented at the 2015, 2013, 2012, 2011, 2010, and 2009 Annual Business Conference of the Association of Oil Pipe Lines

"Ratemaking: Beyond the Basics" Presented at the 2011, 2010, 2009, and 2008 Annual Business Conference of the Association of Oil Pipe Lines

"New Developments in Pipeline Expansions: Executing the Deal" Presented at the 2011 Annual Business Conference of the Association of Oil Pipe Lines

"FERC 101" Presented at the 2008 and 2007 Annual Business Conference of the Association of Oil Pipe Lines

The Political Economy of the Israel Palestine Conflict: An Evolutionary Game Theory Approach: Doctoral Dissertation

Rowley, C.K and M. J. Webb "Israel and Palestine: the slow road to peace or the fast track to mutual annihilation" Public Choice (July 2007) 132: 7-26

"The Antitrust Review of Oil Pipe Line Mergers at the FTC" Presented that the 2007 Annual Business Conference of the Association of Oil Pipe Lines

"Surviving a Rate Case" Presented at the 2006 Annual Business Conference of the Association of Oil Pipe Lines

Previous Relevant Employment

Association of Oil

Intern

Pipe Lines (1997-1998) Prepared statistical analysis of pipe line failures from publicly available sources. Assisted Executive Director in employing

economic theory to address industry concerns.

Education

George Mason University

PhD, Economics MA, Economics

American University

BA, Economics and International Studies (Magna Cum Laude)

	Crimson SoCal 2025 Application		MJW-2
	Name	Description	<u>Tab</u>
	Achieved Return Proposed Rates	Achieved Return for the Test Period Proposed Rates per Route	Achieved Return Proposed Rates
	Statement A Statement B Statement C Statement E Statement F1 Statement F2	Total Cost of Service Operating Expenses Overall Return on Rate Base Rate Base AFUDC Amortization of AFUDC Operating Revenues	A B C E1 F1 F2 G
E.	WorkPaper 1 WorkPaper 2	Input Data Volumes and Revenues	WP1 WP2

MJW-2 Crimson SoCal 2025 Application Achieved Return for the Test Period

Line	Description	Source	At Effective Rates	At 10% Increase [b]	At COS-Based Rates
1 2	Transportation Revenues Torrance Station (PUC-109) Revenues	Statement G, Lines 1, 2, 3 WorkPaper 2, Line 34	\$30,128,608 \$899,547	\$33,139,938 \$899,547	\$34,607,425
640	Allowance Oil Revenue PUC Accounting & Gauging Fees PUC Water Penalty	WorkPaper 2, Line 35 WorkPaper 2, Line 36 WorkPaper 2, Line 37	\$6,337,862 \$233,554 \$183,382	\$6,337,862 \$233,554 \$183,382	\$6,337,862 \$233,554 \$183,382
9	Total Revenues	Sum Lines (1 to 5)	\$37,782,953	\$40,794,283	\$42,261,770
7 8 9	Operating Expenses less Depreciation Depreciation Expense Amorization of AFUDC Total Expenses	Statement A, Line 2 Statement A, Line 3 Statement A, Line 4 Sum 1 ine (7 to 9)	\$29,499,641 \$4,541,590 \$137,716	\$29,499,641 \$4,541,590 \$137,716 \$34,178,947	\$29,499,641 \$4,541,590 \$137,716 \$34,77,716
11 12 12	Operating Income Average Original Cost Rate Base	Lines (6 - 10) Statement C, Line 1	\$3,604,005 \$58,586,189	\$6,615,336 \$58,586,189	\$8,082,823 \$58,586,189
13	Achieved Overall Return on Rate Base	Lines (11 / 12)	6.15%	11.29%	13.80%
14 15 16	Weighted Cost of Debt Weighted Rate of Return on Equity Equity Ratio	Statement C, Line 9 Lines (13 - 14) WorkPaper 1, Line 21	4.80% 1.35% 60%	4.80% 6.49% 60%	4.80% 9.00% 60%
17	17 Achieved Rate of Return on Equity	Lines (15 / 16)	2,25%	10.82%	14.99%

MJW-2 Crimson SoCal 2025 Application Proposed Rates per Route

					Pipeline Rates (\$/Bbl)	
Line	System	Receipt Location	Delivery Location	Effective on June 1, 2024	Allowed Increase	Proposed Increase 14.87%
-		REDULIA,	East Crude System, Stewart Sta.,	0.6554	0.7209	0.7528
,	East Crude System	Tonner Canyon Ln. (Stearns Junc.),	East Crude System, Stewart Sta.,	0.0224	00020	00000
7	(Line /00)	Orange Co.	Orange Co.	0.0334	0.7209	0.7328
"	Camering	Sansmena Tie-in,	East Crude System, Stewart Sta.,	0.6554	0.7209	0.7528
		Orange Co.	Orange Co.			
4	East Crude System	East Crude System, Stewart Sta.,	P66 Carson Refinery,	1.5468	1.7014	1.7768
	(Line 700)	Orange Co.	LA Co.			
ν,	Trunk	East Crude System, Norwalk Sta.,	P66 Carson Refinery,	1.3370	1.4707	1.5358
		LA Co.	LA Co.			
9		Mandalay Area (Ln. 830),	Ventura Sta.,	0.6554	0.7209	0.7528
		Ventura Co.	Ventura Co.			
7		Saticoy Junc.,	Santa Paula Sta.,	0.6554	0.7209	0.7528
	Ventura/	Ventura Co.	Ventura Co.			
04	Santa Paula/	Sulphur Crest Area Gathering,	Santa Paula Sta.,	0.6554	0 7209	0.7528
۰	Torrey Gathering	Orange Co.	Ventura Co.	10000	0.00	07010
۰	TOTICS CALICILIES	Santa Paula Truck Rack,	Santa Paula Sta.,	0 4457	0.4902	0.5110
,		Ventura Co.	Ventura Co.	0.4457	7074.0	0.011
2		Torrey Area Gathering,	Torrey Sta.,	12570	0 7209	0.7528
7		Ventura Co.	Ventura Co.	F.C.C.	0.720	0.1.0
=		Ventura Sta.,	Torrance Sta.,	1 7565	1 9321	2 0177
		Ventura Co.	LA Co.	1.1000	1.7051	7.170.77
5		Ventura Sta.,	Sepulveda Vault,	1 7565	1 9331	20177
		Ventura Co.	LA Co.		17000	
13		Santa Paula Sta.,	PBF Junc.,	1 7565	1 9321	2.0177
3		Ventura Co.	LA Co.	200 114		
7	I ine 600 Termk	Santa Paula Sta.,	Torrance Sta.,	1 7565	1 9321	2 0177
:		Ventura Co.	LA Co.	200111	19000	
7		Santa Paula Sta.,	Sepulveda Vault,	1 7565	1 9321	2 0177
2		Ventura Co.	LA Co.	7.1.700	1.7041	110.0
1,5		Torrey Sta.,	Torrance Sta.,	1 7565	1 9321	2 0177
2		Ventura Co.	LA Co.	1.1.000	13000	110.7
17		Torrey Sta.,	Sepulveda Vault,	1 7565	1 9321	20177
7		Ventura Co.	LA Co.	1.1.000	12001	7.77
10	West LA	Las Cienegas Ln.,	Ln. 600, Venice Tie-In,	0.6554	0 7200	0.7528
P	Gathering	LA Co.	LA Co.	£000.0	0.120	0.1.0
٤	W. T. A. T.	Ln. 600, Pico Tie-In,	Torrance Sta.,	70711	7000 1	1 2551
7	west LA Itunk	LA Co.	LA Co.	1.11.21	1.2770	1666.1
ç	Mohawk to	Mohawk Sta.,	Ventura Tank Farm,	93020	0.4251	0.4544
22	Ventura TF	Ventura Co.	Ventura Co.	0.55.0	1004.0	1101.0
2		Ventura Tank Farm,	PBF Junc.,	1 4967	1 6463	1 7192
1	Ventura Tank Farm	Ventura Co.	LA Co.		2010-1	
22	to LA Refineries	Ventura Tank Farm,	P66 Carson Refinery,	1.4967	1.6463	1.7192
		Ventura Co.	LA Co.			

MJW-2 Crimson SoCal 2025 Application Proposed Rates per Route

					VI 161/10/ / LE JE - 411		
					ripeline Kates (3/Bbl)		
Line	System	Receipt Location	Delivery Location	Effective on	Allowed Increase	Proposed Increase	
				June 1, 2024	10%	14.87%	
ξ,		Inglewood Connection,	Sepulveda Vault,	1 4206	1 5676	1 6318	
6.7	Inglewood to	LA Co.	LA Co.	1.4200	1,5020	1,0016	
7	LA Refineries	Inglewood Connection,	Torrance Sta.,	1 4306	7673 1	1 6210	
+ 7		LA Co.	LA Co.	1.4200	1.3920	1.0310	
35		San Miguelito,	Ventura Tank Farm,	0.4634	70050	0.5211	
3	Ventura	Ventura Co.	Ventura Co.	0.4024	0.0000	0.3311	
>	Gathering	Ventura,	Ventura Tank Farm,	0.4274	7002 0	0.6211	
07		Ventura Co.	Ventura Co.	0.4024	0.5000	0.3311	
ć		Beta,	Marathon, P66, Valero LA Refineries,	30170	0.7920	0.0105	
17	TUIT IN C. C. cotorco	LA Co.	LA Co.	0.7120	0.7030	0.0100	
ç	THOMS SYSTEM	THUMS Terminal,	Marathon, P66, Valero LA Refineries,	20170	0.7939	0.9195	
70		LA Co.	LA Co.	0.7120	0.7838	0.010.0	
۶	Inglewood	Inglewood Area,	Crimson Inglewood Connection,	0.6343	7723 0	0.6031	
77	to Crimson	LA Co.	LA Co.	U.3542	007.00	0.0021	
30		Seal Beach Area,	East Crude System, Norwalk Sta.,	1 2156	1 3371	1 3063	
25		LA-Orange Co.	LA Co.	0.012.1	1755.1	1,3703	
2.1	Mosehom Trumb	Huntington Beach Area,	P66 Carson Refinery,	27177	2 0800	2 1214	
21	IVOI MIGHT III MIES	Orange Co.	LA Co.	2.1113	4.7070	2,1217	
33		Huntington Beach Area,	World Oil Refinery South Gate,	2 7172	00800	2 1014	
76		Orange Co	I A Co	2.1113	7.7020	7.121.6	

Statement A Page 1 of 1

MJW-2 Crimson SoCal 2025 Application Total Cost of Service

1	Line	Description	Source	Base Period	Base Period Test Period
	-	Overall Return on Rate Base	Statement C, Line 7	\$7,225,978	\$8,084,894
	7	Operating Expenses Excluding Depreciation	Statement B, Line 21	\$ 25,274,572 \$ 29,499,641	\$ 29,499,641
	3	Depreciation Expense	Statement B, Line 13	\$2,727,536	\$4,541,590
	4	Amortization of AFUDC	Statement F2, Lines (4 + 10)	\$73,572	\$137,716
	80	Total Cost of Service before Revenue Credits	Sum Lines (1 to 4)	\$35,301,657	\$42,263,841
	9	Revenue Credits	WorkPaper 1, - Line 46	(\$7,887,021)	(\$7,887,021) (\$7,654,345)
	7	Total Cost of Service after Revenue Credits	Lines (5 + 6)	\$27,414,636	\$34,609,497
	00	Transportation Revenues	WorkPaper 1, Line 42	\$29,898,649	\$30,128,608
	6	Revenue Excess (Deficiency)	Lines (8 - 7)	\$2,484,013	(\$4,480,889)
	10	Revenue Excess (Deficiency) in Percent	Lines (9 / 8)	8.31%	-14.87%

Statement B Page 1 of 2

MJW-2 Crimson SoCal 2025 Application Operating Expenses

Į.	Doctoringian	2023	Norma	Normalizing Adjustments	ents		Base
		Actuals	#1	#2	#2	ŀ	Period
	OPERATIONS AND MAINTENANCE						
_	300 Salaries and Wages	\$ 3,918,836	ř		•	⇔	3,918,836
2	310 Materials and Supplies	\$ 194,300	ì	Tr.	•	69	194,300
3	320 Outside Services	\$ 8,772,655		•	1	6 3	8,772,655
4	330 Operating Fuel and Power	\$ 1,667,006	*	•	•	\$ 1,	1,667,006
'n	340 Oil Losses and Shortages	\$ 759,125	i	(759, 125)	'	69	•
9	350 Rentals	\$ 3,028,762	*	ï	•	& ,3	3,028,762
7	390 Other Expenses	\$ 488,013		i	•	69	488,013
00	Total Operations Expense	\$ 18,828,697	9	(759,125)	•	\$ 18,	\$ 18,069,572
	GENER AI						
•		,000				•	700 000
~	OUU Salaries and Wages	\$ 1,756,320			•	A	1,738,325
01	510 Materials and Supplies	\$ 143,965	•	•	(1,734)	69	142,231
11	520 Outside Services	\$ 5,050,041	(2,500,307)		(1,694,086)	69	855,648
12	530 Rentals	\$ 54,221	•	•	(46,982)	69	7,239
13	540 Depreciation and Amortization	\$2,727,536	•	ï	¥	\$ 2,	2,727,536
14	550 Employee Benefits	\$ 1,050,335	•	•	236	\$	1,050,335
15	560 Insurance	\$ 1,779,713	•	1	(59,214) \$		1,720,499
91	570 Casualty and Other Losses	· 69	•	٠	•	69	•
17	580 Pipeline Taxes	\$ 1,032,429	•	T.	1	\$	1,032,429
18	590 Other Expenses	\$ 812,770	•	•	(174,477)	69	638,293
19	Total General Expense	\$ 14,409,335	(2,500,307)	r	(1,976,493) \$		9,932,535
20	Total Operating Expenses	\$ 33,238,032	(2,500,307)	(759,125)	(1,976,493) \$ 28,002,107	\$ 28,	002,107
21	Operating Expenses, less Depreciation	\$ 30,510,497				\$ 25,	\$ 25,274,572

Normalizing Adjustments
#1 To remove rate case expenses.
#2 To remove pipeline release expenses.
#3 To remove CORR allocations.

9	Doccrintion					Test Period Adjustments	diustments					_	Test
		#1	#2	#3	#	\$#	9#	47	8#	6#	#10	4	Period
	OPERATIONS AND MAINTENANCE												
_	300 Salaries and Wages	•	•	•	•	•	•	•	•	1	•	83 (3)	\$ 3,918,836
7	310 Materials and Supplies	•	•	١	*	,	•	•	•	•	•	6/9	194,300
3	320 Outside Services	3,319,464	(244,652)	•	*	•	•	•	•	1	•	\$ 11,	\$ 11,847,467
4	330 Operating Fuel and Power	•	•	•		•	•	•	•	•	•	\$ 1,	1,667,006
2	340 Oil Losses and Shortages	•	•	•	2	•	•	•	•	•	•	69	•
9	350 Rentals	•	•	543,090	٠	•	•	•	•	1	т	33	3,571,853
7	390 Other Expenses	1	•	•	31	•	•	•	•	•	•	69	488,013
oc	Total Operations Expense	3,319,464	(244,652)	543,090	M	•	•	•	•	•	•	\$ 21,	\$ 21,687,474
	GENERAL												
6	500 Salaries and Wages	٠	,	•	(179,331)	•		•	•	٠	1	\$ I,	1,578,995
10	510 Materials and Supplies	•	,	•	•	•	•	١	•	•	**	6/9	142,231
Ξ	11 520 Outside Services	•	•		•	(163,823)	•		•	1,500,000	,	s ,2	2,191,825
12	530 Rentals	•	•	,	•	•	•	,	•	1)))())	69	7,239
13	540 Depreciation and Amortization	•	•	•	•	•	•	•	•	•	1,814,054	& 4,	4,541,590
14	550 Employee Benefits	•	•	1	•	•	(188,300)	,	١	•	•	69	862,035
15	560 Insurance	•	•	•	•	•	ı	•	•	•	•		1,720,499
16	570 Casualty and Other Losses	1	9	•	•	•	•	'	٠	•	1	69	•
17	17 580 Pipeline Taxes	•	e.	1	•	•	,	(157,694)	•	•	•	69	874,735
18	18 590 Other Expenses	•	•	1	١	•	•	•	(203,685)	•	1	69	434,608
19	19 Total General Expense	1	*	1	(179,331)	(179,331) (163,823) (188,300)	(188,300)	(157,694)	(203,685)	1,500,000	(203,685) 1,500,000 1,814,054 \$ 12,353,756	\$ 12,	353,756
20	20 Total Operating Expenses 21 Operating Expenses, less Depreciation	3,319,464	(244,652)	543,090	(179,331)	(179,331) (163,823) (188,300)	(188,300)	(157,694)	(157,694) (203,685) 1,500,000		1,814,054	\$ 34,	\$ 34,041,231

Test Period Adjustments

#1 #2 #3 #4 #6 #7 #8 #9

To account for increases in 7000 Asset Maintenance.

To account for increases in 7022 Other Contract Services.

To account for increases in 7025 Right of Way.

To account for changes in 8007 Professional Fees and 8030 Salaries and Benefits Allocations.

To account for decreases in 8026 Employee Benefits - Other

To account for decreases in 8025 Employer Payroll Taxes.

To account for decreases in 8642 Penalties and Fines.

To account for increased depreciation expenses due to rate base.

MJW-2 Crimson SoCal 2025 Application Overall Return on Rate Base

Statement C Page 1 of 1

Line	Line Description	Source	Base Period	Base Period Test Period
-	1 Average Original Cost Rate Base	Statement E, Line 10	\$53,925,206	\$58,586,189
3 8	Equity Ratio Debt Ratio	WorkPaper 1, Line 21 1 – Line 2	60% 40%	60% 40%
4 5	Rate of Return on Equity Cost of Debt	WorkPaper 1, Line 23 WorkPaper 1, Line 22	15.00%	15.00%
9	Weighted Cost of Capital	Lines $((2 \times 4) + (3 \times 5))$	13.40%	13.80%
7	Overall Return on Rate Base	Lines (6×1)	\$7,225,978	\$8,084,894
8 6	Weighted Rate of Return on Equity Weighted Cost of Debt	Lines (2×4) Lines (3×5)	9.00%	9.00%
10	10 Return on Equity11 Interest Expense	Lines (1×8) Lines (1×9)	\$4,853,269	\$5,272,757

	Description	Source	2015	2016	2017	2018	2019	2020	2021	2022	Base Period Test Period	Test Period
Total Carrier Property Carrier Property in Ser Accumulated AFUDC	Total Carrier Property in Service Carrier Property in Service Accumulated AFUDC	WorkPaper I, Line 8 Statement F2, Lines (2 + 8)	\$52,247,447 \$487,240		\$56,820,151	\$58,334,355	\$58,334,355 \$64,277,809 \$834,401 \$964,195		\$79,433,782	\$80,885,264		\$96,626,524
stal Carrie	Total Carrier Property in Service	Lines $(1+2)$	\$52,734,687	\$55,881,266	\$57,561,050	\$55,881,266 \$57,561,050 \$59,168,756	\$65,242,004		\$68,320,818 \$81,289,732	\$82,816,620	\$96,167,881	\$99,619,000
tal Accur	Total Accumulated Depreciation Accumulated Depreciation of Carrier Property	WorkPaper 1, Line 15	\$19,510,761	\$21,192,696	\$22,946,194		\$24,748,362 \$26,993,480	69	\$31,345,889	83	\$36,582,418	\$41,124,008
cumulate	Accumulated Amortization of AFUDC Total Accumulated Depreciation	Statement F2, Lines $(5+11)$ Lines $(4+5)$	\$80,503 \$19,591,264	\$98,408 \$21,291,104	\$120,282 \$23,066,476	\$144,935 \$24,893,297	\$173,083 \$27,166,563	\$205,732 \$29,256,821	\$252,338 \$31,598,226	\$311,609 \$34,166,491	\$385,181 \$36,967,598	\$522,897 \$41,646,905
t Carrier	Net Carrier Property In Service	Lines (3 - 6)	\$33,143,423	\$34,590,162	\$34,494,574	\$34,275,458	\$38,075,441	\$34,590,162 \$34,494,574 \$34,275,458 \$38,075,441 \$39,063,997 \$49,691,506 \$48,650,129	\$49,691,506	\$48,650,129	\$59,200,283	\$57,972,095
Working Capital	apital	WorkPaper 1, Line 20	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
iginal Co	Original Cost Rate Base	Lines (7 + 8)	\$33,143,423	\$34,590,162	\$34,494,574	\$34,275,458	\$38,075,441	\$34,275,458 \$38,075,441 \$39,063,997	\$49,691,506	\$48,650,129	\$59,200,283	\$57,972,095
rerage Or	10 Average Original Cost Rate Base	Average Line 9		\$33,866,792	\$34,542,368	\$34,385,016	\$36,175,450	\$33,866,792 \$34,542,368 \$34,385,016 \$36,175,450 \$38,569,719 \$44,377,751 \$49,170,817 \$53,925,206 \$58,586,189	\$44,377,751	\$49,170,817	\$53,925,206	\$58,586,189

Description	Source	2015	2016	2017	2018	2019	2020	2021	2022	Base Period Test Period	Test Period
Equity Ratio Debt Ratio	WorkPaper 1, Line 21		60%	60%	60%	60%	60%	60%	60%	60%	60%
Rate of Return on Equity	WorkPaper 1, Line 23		14.65%	13.23%	16.25%	13.98%	14.59%	15.66%	11.45%		15.00%
Cost of Debt	WorkPaper 1, Line 22		6.50%	6.50%	6.50%	6.50%	6.50%	6.50%	8.80%	11.00%	12.00%
Depreciable Property in Service Additions	WorkPaper 1, Lines (5-1)		\$2,976,997	\$1,595,706	\$1,514,204	\$2,362,470	\$2,779,934	\$12,234,972	\$1,451,483	\$12,512,898	\$3,228,362
Equity AFUDC BOY	Prior Line 9		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
UDC Additions	Lines ((Prior $9 + \frac{1}{2} \times 1 \times 5) \times 3$)		\$130,880	\$63,334	\$73,817	\$99,082	\$121,675	\$574,887	\$49,858	\$563,080	\$145,276
UDC Transfers to Rate Base	Line 7		\$130,880	\$63,334	\$73,817	\$99,082	\$121,675	\$574,887	\$49,858	\$563,080	\$145,276
Equity AFUDC EOY	Lines (6 + 7 - 8)	\$0	0\$	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Debt AFUDC BOY	Prior Line 13		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Debt AFUDC Additions	Lines ((Prior 13 + $\frac{1}{2} \times 2 \times 5) \times 4$)		\$38,701	\$20,744	\$19,685	\$30,712	\$36,139	\$159,055	\$25,546	\$275,284	\$77,481
Debt AFUDC Transfers to Rate Base	Line 11		\$38,701	\$20,744	\$19,685	\$30,712	\$36,139	\$159,055	\$25,546	\$275,284	\$77,481
Debt AFUDC EOY	Lines $(10 + 11 - 12)$	\$0	\$0	\$0	\$0	\$0	\$0		\$0	\$0	\$0

Ë	Line Description	Source	2015	2016	2017	2018	2019	2020	2021	2022	Base Period	Test Period
	Equity AFUDC Transfers to Rate Base	Statement F1, Line 8		\$130,880	\$63,334	\$73,817	\$99,082	\$121,675	\$574,887	\$49,858	\$563,080	\$145,276
2	Accumulated Equity AFUDC	Cumulative Line 1	\$359,645	\$490,525	\$553,859	\$627,676	\$726,758	\$848,433	\$1,423,320	\$1,473,178	\$2,036,259	\$2,181,535
æ	Depreciation Rates	WorkPaper 1, Line 11		3.13%	3.13%	3.13%	3.13%	3.13%	3.13%	3.13%	3.13%	4.78%
4	Amortization of Equity AFUDC	Lines ((Prior $2 + \frac{1}{2} \times 1) \times 3$)		\$13,305	\$16,345	\$18,491	\$21,197	\$24,652	\$35,553	\$45,330	\$54,923	\$100,805
3	Accumulated Amortization of Equity AFUDC	Cumulative Line 4	\$59,086	\$72,391	\$88,736	\$107,227	\$128,424	\$153,075	\$188,628	\$233,959	\$288,881	\$389,687
9	Net Equity AFUDC	Line (2 - 5)	\$300,559	\$418,134	\$465,123	\$520,450	\$598,335	\$695,358	\$1,234,692	\$1,239,220	\$1,747,378	\$1,791,849
7	Debt AFUDC Transfers to Rate Base	Statement F1, Line 12		\$38,701	\$20,744	\$19,685	\$30,712	\$36,139	\$159,055	\$25,546	\$275,284	\$77,481
*	Accumulated Debt AFUDC	Cumulative Line 7	\$127,595	\$166,296	\$187,040	\$206,725	\$237,437	\$273,576	\$432,631	\$458,177	\$733,461	\$810,941
6	Depreciation Rates	WorkPaper 1, Line 11		3.13%	. 3.13%	3.13%	3,13%	3.13%	3.13%	3.13%	3.13%	4.78%
10	10 Amortization of Debt AFUDC	Lines ((Prior $8 + \frac{1}{2} \times 7) \times 9$)		\$4,599	\$5,530	\$6,162	\$6,951	\$7,997	\$11,052	\$13,941	\$18,649	\$36,911
11	11 Accumulated Amortization of Debt AFUDC	Cumulative Line 10	\$21,417	\$26,016	\$31,546	\$37,709	\$44,660	\$52,657	\$63,709	\$77,650	\$96,299	\$133,211
12	12 Net Debt AFUDC	Line (8 - 11)	\$106,178	\$140,280	\$155,494	\$169,016	\$192,777	\$220,919	\$368,922	\$380,527	\$637,161	\$677,731

MJW-2
Crimson SoCal
2025 Application
Operating Revenues

Line	Description	Source	Test Period
П	Revenues Under Effective Rates	Deliveries × Effective Rates	\$30,128,608
2	Revenues Under 10% Increased Rates	Delieveries \times Effective Rates \times (1 + 10%)	\$33,139,938
3	Revenues Under Proposed Rates	Deliveries × Proposed Rates	\$34,607,425

MJW-2 Crimson SoCal 2025 Application Input Data

Line	Description	Source	2015	2016	2017	2018	2019	2020	2021	2022	Base Period Test Period	Test Period
	Carrier Property in Service ("CPIS")											
_	Land Additions	Company Records		0\$	80	\$0	\$0	\$0	\$0	80	\$0	\$0
2	Land Retirements	Company Records		\$0	80	\$0	\$0	\$0	\$0	80	\$0	\$0
3	Land Adjustments and Transfers	Company Records		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4		Sum Lins (1 to 3 + Prior 4) 1/	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
5	CPIS Additions	Company Records		\$2,976,997	\$1,595,706	\$1,514,204	\$2,362,470	\$2,779,934	\$12,234,972	\$1,451,483	\$12,512,898	\$3,228,362
9	CPIS Retirements	Company Records		\$0	80	\$0	(\$1,448,572)	\$0	\$0	\$0	\$0	\$0
7 %	CPIS Adjustments and Transfers	Company Records Sum Line (5 to 7 + Prior 8) 1/	\$52 247 447	\$0 \$0.000,000,000,000,000,000,000,000,000,0	\$56 820 151	\$58 334 355	\$5,029,556	\$141,066	\$0 \$0	\$80 885 264	\$03	\$0
5		is (a source of one) supporting			101,020,000	20061 20000	70, 74, 75	100,011,100	10,100,100	200000	1016006	
9	Depreciable CPIS EOY Average Depreciable CPIS	Lines (8 - 4) Average Line 9	\$52,247,447	\$55,224,444	\$56,820,151	\$58,334,355	\$64,277,809	\$67,198,809	\$79,433,782	\$80,885,264 \$80,159,523	\$93,398,162	\$96,626,524
=	11 Depreciation Rates	7	3,13%	3.13%				3.13%	3.13%			4.78%
		i										
13 13	Depreciation Expense Depreciation Retirements Depreciation Adjustments and Transfers	Lines (10×11) Line 6 CPUC Decision 24-05-007		\$1,681,935 \$0 \$0	\$1,753,498 \$0 \$0	\$1,802,168 \$0 \$0	\$1,918,880 (\$1,448,572) \$1,774,809	\$2,057,609 \$0 \$0	\$2,294,800 \$0 \$0	\$2,508,993 \$0 \$0	\$2,727,536 \$0 \$0	\$4,541,590 \$0 \$0
15		Sum Lins (12 to 14 + Prior 15) 1/	\$19,510,761	\$21,192,696	\$22,946,194	\$24,748,362	\$26,993,480	\$29,051,089	\$31,345,889	\$33,854,882	\$36,582,418	\$41,124,008
16		7.7.7.	\$359,645									
19	Accum, Deot Ar UDC Accum, Amortization of Debt AFUDC	1/	\$21,417									
20	20 Working Capital	Company Records	80	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Cost of Capital											
21	l Equity Ratio	CPUC Decision 24-05-007	%09				%09	%09	%09		%09	%09
22 23	2 Cost of Debt 3 Rate of Return on Equity	Company Records MJW-2	6.50% 11.45%	6.50% 14.65%	6.50% 13.23%	6.50% 16.25%	6.50% 13.98%	6.50% 14.59%	6.50% 15.66%	8.80% 11.45%	11.00%	12.00% 15.00%
-	TOTAL STORY OF STANCE STORY OF											

 ²⁰¹⁵ EOY from 2016 CPUC Decisions
 Initial rate reflects 20-Year Remaining Life based on 2016 CPUC Decision.
 Test Period rate updated to keep 2036 end of Remaining Life

MJW-2 Crimson SoCal 2025 Application Input Data

Line	Description	Source	7707	Base Period	Test Period
	Operating Expenses				
	OPERATIONS AND MAINTENANCE				
23	300 Salaries and Wages	Statement B, Line 1		3,918,836	3,918,836
24	310 Materials and Supplies	Statement B, Line 2		194,300	194,300
25	320 Outside Services	Statement B, Line 3		8,772,655	11,847,467
56	330 Operating Fuel and Power	Statement B, Line 4		1,667,006	1,667,006
27	340 Oil Losses and Shortages	Statement B, Line 5		759,125	0
28	350 Rentals	Statement B, Line 6		3,028,762	3,571,853
53	390 Other Expenses	Statement B, Line 7		488,013	488,013
30	Total Operations Expense	Sum Lns (23 to 29)		\$18,828,697	\$21,687,474
	GENERAL				
31	500 Salaries and Wages	Statement B, Line 9		1,758,326	1,578,995
32	510 Materials and Supplies	Statement B, Line 10		143,965	142,231
33	520 Outside Services	Statement B, Line 11		5,050,041	2,191,825
34	530 Rentals	Statement B, Line 12		54,221	7,239
35	550 Employee Benefits	Statement B, Line 13		1,050,335	862,035
36	560 Insurance	Statement B, Line 14		1,779,713	1,720,499
37	570 Casualty and Other Losses	Statement B, Line 15		0	0
38	580 Pipeline Taxes	Statement B, Line 16		1,032,429	874,735
39	590 Other Expenses	Statement B, Line 17		812,770	434,608
40	Total General Expense	Sum Lns (31 to 39)		\$11,681,800	\$7,812,166
41	Operating Expenses less Depreciation	Line (30 + 40)		\$30,510,497	\$29,499,641
	Revenues				
42	210 Transportation Revenues	WorkPaper 2, Line 33		\$29,898,649	\$30,128,608
43	Torrance Station (PUC-109) Revenue	WorkPaper 2, Line 34		\$741,477	\$899,547
44		WorkPaper 2, Line 35		\$6,679,411	\$6,337,862
45 46	260 Other Revenues Total Revenue Credits	WorkPaper 2, Sum Lns (36 to 37) Sum Lines (43 to 45)		\$466,132 \$7,887,021	\$416,935 \$7,654,345
	Volumes				
47	Deliveries in Bbls	WorkPaper 2, Line 33		29,012,224	29,185,997
:		·			i

MJW-2 Crimson SoCal 2025 Application Volumes and Revenues

						Tran	Transportation Volumes	imes		Revenues at
Line	s System	Receipt Location	Delivery Location	Effective Tariff	2023 Actuals	Normalizing Adjustments	Base Period	Test Period Adjustments	Test Period	Effective Rates Test Period
	3	REDU Lu, Oranne Co.	East Crude System, Stewart Sta., Orange Co.	\$0.6554	362,110	0	362,110	(16,903)	345,207	\$226,249
2	Fast	Tonner Canyon Lu. (Stearns Junc.), Orange Co.	East Crude System, Stewart Sta., Orange Co.	\$0.6554	598,784	0	598,784	(20,953)	577,830	\$378,710
e.	Gathering	Sansinena Tie-in, Orange Co.	East Crude System, Stewart Sta., Orange Co.	\$0.6554	198,908	0	198,908	(4,517)	194,390	\$127,403
4	East	East Crude System, Stewart Sta., Orange Co.	P66 Carson Refinery, LA Co.	\$1.5468	958,491	0	958,491	41,217	999,708	\$1,546,349
'n	(Line 700) Trunk	East Crude System, Norwalk Sta., LA Co.	P66 Carson Refinety, LA Co.	\$1.3370	1,242,866	0	1,242,866	(149,098)	1,093,768	\$1,462,368
9		Mandalay Area (Ln. 830), Ventura Co.	Ventura Sta., Ventura Co.	\$0.6554	507,730	0	507,730	(19,533)	488,197	\$319,964
7		Saticoy Junc., Ventura Co.	Santa Paula Sta., Ventura Co.	\$0.6554	53,267	0	53,267	(7)	53,259	\$34,906
∞		Sulphur Crest Area Gathering, Orange Co.	Santa Paula Sta., Ventura Co.	\$0.6554	207,844	0	207,844	(6,841)	201,003	\$131,737
6	l orrey Gamering	Santa Paula Truck Rack, Ventura Co.	Santa Paula Sta., Ventura Co.	\$0.4457	841,636	0	841,636	42,006	883,642	\$393,839
2	c	Torrey Area Gathering, Ventura Co.	Torrey Sta., Ventura Co.	\$0.6554	392,451	0	392,451	(4,120)	388,331	\$254,512
=	1	Ventura Sta., Ventura Co.	Torrance Sta., LA Co.	\$1.7565	0	0	0	162,388	162,388	\$285,235
12	2	Ventura Sta., Ventura Co.	Sepulveda Vault, L.A Co.	\$1.7565	1,205,370	0	1,205,370	(220,666)	984,705	\$1,729,634
13	3	Santa Paula Sta., Ventura Co.	PBF Junc., LA Co.	\$1.7565	268,208	0	268,208	(9,432)	258,776	\$454,540
14	4 Line 600 Trunk	Santa Paula Sta., Ventura Co.	Torrance Sta., L.A Co.	\$1.7565	484,731	0	484,731	28,805	513,536	\$902,027
15	5	Santa Paula Sta., Ventura Co.	Sepulveda Vault, LA Co.	\$1.7565	521,941	0	521,941	272,913	794,853	\$1,396,160
16	15	Torrey Sta., Ventura Co.	Torrance Sta., LA Co.	\$1.7565	128,168	0	128,168	(85,247)	42,920	\$75,390
17	4	Torrey Sta., Ventura Co.	Sepulveda Vault, LA Co.	\$1.7565	143,365	0	143,365	8,074	151,439	\$266,003
188	8 West LA	Las Cienegas Ln., LA Co.	Ln. 600, Venice Tie-In, LA Co.	\$0.6554	77,360	0	77,360	(4,361)	73,000	\$47,844
19	9 West LA Trunk	Ln. 600, Pico Tie-In, LA Co.	Torrance Sta., LA Co.	\$1.1797	203,782	0	203,782	(15,380)	188,402	\$222,258
20	0 Mohawk to Ventura TF	Mohawk Sta., Ventura Co.	Ventura Tank Farm, Ventura Co.	\$0.3956	999,837	0	999,837	282,760	1,282,598	\$507,396
21	1 Ventura Tank Farm	Ventura Tank Farm, Ventura Co.	PBF Junc., LA Co.	\$1.4967	2,849,572	0	2,849,572	(806,818)	2,042,754	\$3,057,389
22	2 to LA Refineries	Ventura Tank Farm, Ventura Co.	P66 Carson Refinery, LA Co.	\$1.4967	1,453,528	0	1,453,528	860,963	2,314,491	\$3,464,098

MJW-2 Crimson SoCal 2025 Application Volumes and Revenues

						Trans	Transportation Volumes	umes		Revenues at
Line	System	Receipt Location	Delivery Location	Effective Tariff	2023 Actuals	Normalizing Adjustments	Base Period	Test Period Adjustments	Test Period	Effective Rates Test Period
5		Inglewood Connection,	Sepulveda Vault,	\$1.4206	1 824 817	-	1 824 817	(AOA ODA)	1 329 914	\$1 889 775
3	Inglewood to	LA Co.	LA Co.	41.7200	4,044,017	>	1,04=,017	(TON-TOTA)		01,000,10
24	LA Refineries	Inglewood Connection,	Torrance Sta.,	\$1.4206	175 751	-	275 253	198 082	523 335	\$743 449
+7		LA Co.	LA Co.	0071.150	Castan	>	Carlo and	700,007	Contour	61.6
36		San Miguelito,	Ventura Tank Farm,	\$0,4624	440 781	C	450 781	(176 07)	438 840	\$202 920
7	Ventura	Ventura Co.	Ventura Co.	100.00	10/4/01	,	Tarker	(1. (1.2)		
7	Gathering	Ventura,	Ventura Tank Farm,	PC9F 03	3 841 060	C	7 841 060	(142 \$71)	7 698 489	\$1 247 781
97		Ventura Co.	Ventura Co.	40.4054	4,04T,000	9	2,041,000	(1/6,5/1)		101,172,10
1		Beta,	Marathon, P66, Valero LA Refineries,	3617.0\$	1 111 722	c	1 111 732	141 946	973 576 1	\$893 371
17	TERTING Constant	LA Co.	LA Co.	90.7120	4,111,134	>	Action April 2	111,710	A topography	T. C. C. C. C.
90	IIIOIME SYSTEM	THUMS Terminal,	Marathon, P66, Valero LA Refineries,	\$0.71.26	5 184 017	c	5 184 012	268 197	5 452 209	PPC 588 E\$
07		LA Co.	LA Co.	40.7120	Sylvania	>	2,101,01,0	771,000	Combination	7,000,00
00	Inglewood	Inglewood Area,	Crimson Inglewood Connection,	\$0.5742	1 956 306	c	1 956 306	(179 198)	1 777 108	\$931 560
67	to Crimson	LA Co.	LA Co.	2000	and and a	,	an office of the	(27,57,12)	267 1 167	200620
9.0		Seal Beach Area,	East Crude System, Norwalk Sta.,	\$12156	1 044 246	C	1 044 246	(41 030)	1.003.216	\$1219510
25		LA-Orange Co.	LA Co.	0017.19	7,011,010	2	2011/10/1	(200,11)		04.674.864.5
77	Northam Trimk	Huntington Beach Area,	P66 Carson Refinery,	\$2,7173	100.938	0	100.938	247.801	348.738	\$947.627
10	THE PROPERTY OF THE PARTY OF TH	Orange Co.	LA Co.		and an	,	and the second			
23		Huntington Beach Area,	World Oil Refinery South Gate,	\$27773	464 129	c	464 129	(138 858)	325 271	\$883.850
75		Orange Co.	LA Co.		CWY SECON	·		(224,027)		
33	33 Pipeline Transportation Total	Total			29,012,224	0	29,012,224	173,773	29,185,997	\$30,128,608

\$899,547	\$6,337,862 \$233,554 \$183,382 \$6,754,798	\$37,782,953
\$741,477	\$6,679,411 \$238,788 \$27,345 \$7,145,544	
\$741,477	\$6,679,411 \$238,788 \$227,345 \$7,145,544	
ne		
34 Torrance Station (PUC-109) Revenue	35 Allowance Oil Revenue 36 PUC Accounting & Gauging Fees 37 PUC Water Penalty 38 Non-Transportation Revenues Total	39 Total Revenues