

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



FILED
06/05/26
11:35 AM
A2601001

ADMINISTRATIVE LAW JUDGE AMIN NOJAN, presiding

Application of Suburban Water Systems) EVIDENTIARY
(U339W) for Authority to Increase Rates) HEARING
Charged for Water Service by)
\$19,971,673, or 19.41%, in 2027; by)
\$10,876,890, or 8.91%, in 2028; and by) Application
\$10,831,656, or 8.15%, in 2029.) 26-01-001

REPORTERS' TRANSCRIPT
Virtual Proceeding
June 1, 2026
Pages 940 - 1050
Volume 9

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

INDEX

WITNESSES		PAGE
ANTHONY ANDRADE		
Direct Examination By Mr. Hockema		948
Cross-Examination By Ms. Dolqueist		952
Examination By ALJ Nojan		967
ANDREW RUBANG		
Direct Examination By Mr. Hockema		973
Cross-Examination By Ms. Dolqueist		975
Examination By ALJ Nojan		984
EXHIBITS	MARKED	RECEIVED
PUBADV-AA-001	951	1043
SWS-016	952	
PUBADV-AR-001A	972	
SWS-014	975	
SWS-015	975	
SWS-001 - SWS-005	1034	1035
SWS-005C	1034	1035
SWS-006 - SWS-007	1035	1035
SWS-007C	1035	1035
SWS-008	1035	1035
SWS-014 - SWS-016		1036
SWS-BD-001	1037	
SWS-BD-001C	1037	
SWS-CG-001	1037	
SWS-JF-001	1037	
SWS-JF-001C	1037	
SWS-JF-002	1037	
SWS-JS-001	1038	
SWS-JS-002	1038	
SWS-RH-001	1038	
SWS-RH-001C	1038	
SWS-RH-002	1038	
SWS-SJ-001	1038	
SWS-BD-001		1039
SWS-BD-001C		1039
SWS-CG-001		1039
SWS-JF-001		1039
SWS-JF-001C		1039
SWS-JF-002		1039
SWS-JS-001		1039
SWS-JS-002		1039
SWS-RH-001		1040
SWS-RH-001C		1040
SWS-RH-002		1040
SWS-SJ-001		1040
PUBADV-003A	1042	1043

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
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18
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20
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PUBADV-004
PUBADV-AR-001A

1042

1043
1043

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VIRTUAL PROCEEDING

JUNE 1, 2026 - 9:04 A.M.

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ADMINISTRATIVE LAW JUDGE NOJAN: Let's be on the record.

It is June 1st, 2026, and this is the final day of evidentiary hearing for Suburban's (sic) Water GRC. The proceeding number is 26-01-001. Today we will be having two witnesses take the stand. We have -- we have Andrade for Public Advocates and Rubang for Public Advocates.

After we hear from the witnesses, parties will be given a maximum of 15 minutes each for closing arguments. At that point, we'll consider moving in any final exhibits into the record and other housekeeping matters.

So I think what we'll do is we'll begin, as we normally do, by having the attorneys read the attorney attestations, which I'll be pulling up on my screen. And I'll have Ms. Dolqueist begin, and then we will go to Mr. Hockema.

When you're ready, Ms. Dolqueist.

MS. DOLQUEIST: Thank you, your Honor.

I, Lori Dolqueist, attest that I agree to the evidentiary hearing in this instant proceeding being

1 held via Webex;

2 I, Lori Dolqueist, attest that I agree to the
3 witness testimony and exhibits being presented via
4 Webex;

5 I, Lori Dolqueist, attest that I agree to the
6 oaths of remote witness being received by Webex
7 communication;

8 I, Lori Dolqueist, attest that I agree to
9 adhere to all formal rules of decorum including the
10 prohibition against coaching witnesses;

11 I, Lori Dolqueist, attest that I agree that I
12 will not make any recording of the proceeding;

13 I, Lori Dolqueist, attest that I understand
14 that any recording of a proceeding held by Webex and/or
15 teleconference, including screenshots or other visual
16 copying of a hearing, is absolutely prohibited;

17 I, Lori Dolqueist, attest that I understand
18 that a violation of these prohibitions may result in
19 sanctions, restricted entry to future hearings, denial
20 of entry to future hearings or any other sanctions
21 deemed necessary by the Commission;

22 I, Lori Dolqueist, attest that during the
23 evidentiary hearing I will use only the exhibits
24 premarked and identified by the parties;

25 I, Lori Dolqueist, attest that I agree that

1 during the evidentiary hearing I will not use documents
2 not previously shared with the opposing party.

3 ALJ NOJAN: Thank you, Ms. Dolqueist.

4 Mr. Hockema.

5 MR. HOCKEMA: Good morning, your Honor.

6 I, Corwin Hockema, attest that I agree to the
7 evidentiary hearing in this instant proceeding being
8 held via Webex;

9 I, Corwin Hockema, attest that I agree to the
10 witness testimony and exhibits being presented via
11 Webex;

12 I, Corwin Hockema, attest that I agree to the
13 oaths of remote witnesses being received via Webex
14 communication;

15 I, Corwin Hockema, attest that I agree to
16 adhere to all formal rules of decorum including the
17 prohibition against coaching witnesses;

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19 will not make any recording of the proceeding;

20 I, Corwin Hockema, attest that I understand
21 that any recording of a proceeding held by Webex and/or
22 teleconference, including screenshots or other visual
23 copying of a hearing, is absolutely prohibited;

24 I, Corwin Hockema, attest that I understand
25 that a violation of these prohibitions may result in

1 sanctions, restricted entry to future hearings, denial
2 of entry to future hearings or any other sanctions
3 deemed necessary by the Commission;

4 I, Corwin Hockema, attest that during the
5 evidentiary hearing I will use only exhibits premarked
6 and identified by the parties;

7 I, Corwin Hockema, attest that I agree that
8 during the evidentiary hearing I will not use documents
9 not previously shared with the opposing party.

10 ALJ NOJAN: Thank you, Mr. Hockema.

11 My notes show that we have -- do we have the
12 witness Andrade, if I'm pronouncing that correctly,
13 present?

14 MR. HOCKEMA: Yes, your Honor.

15 ALJ NOJAN: Am I pronouncing your last name
16 correctly?

17 MR. ANDRADE: Yes.

18 ALJ NOJAN: Mr. Andrade, I'll be pulling up the
19 attestations here for you to read, and just insert your
20 name in the appropriate place.

21 MR. ANDRADE: I, Anthony Andrade, do solemnly
22 state under penalty of perjury that the testimony I give
23 in the case now pending before this Commission shall be
24 the truth, the whole truth and nothing but the truth;

25 I, Anthony Andrade, attest I will testify based

1 on my own knowledge and memory from external influences
2 or pressures;

3 I, Anthony Andrade, attest I will adhere to all
4 formal requirements of testifying under oath including
5 the prohibition against being coached;

6 I, Anthony Andrade, attest I will only refer to
7 materials provided by the parties, exhibits premarked
8 and identified by the parties and previously shared with
9 the opposing party;

10 I, Anthony Andrade, attest I will not make any
11 recording of the proceeding. I attest I understand that
12 any recording of a proceeding held by Webex, including
13 screenshots or other visual copying of a hearing, is
14 absolutely prohibited;

15 I, Anthony Andrade, attest that I understand
16 that violation of these prohibitions may result in
17 sanctions including removal from the evidentiary
18 hearing, restricted entry to future hearings, denial of
19 entry to future hearings or any other sanctions deemed
20 necessary by the Commission;

21 I, Anthony Andrade, attest I will not engage in
22 any private communications by phone, text or email, any
23 other mode of communication while under oath and being
24 examined;

25 If I, Anthony Andrade, experience any attempts

1 to tamper with my witness testimony, I will report the
2 occurrence to the presiding officer immediately.

3 ALJ NOJAN: Thank you, Mr. Andrade.

4 Mr. Hockema, the witness is yours for direct.

5 ANTHONY ANDRADE,

6 called as a witness by Public Advocates

7 Office, having been sworn, testified as

8 follows:

9 MR. HOCKEMA: Thank you, your Honor.

10 DIRECT EXAMINATION

11 BY MR. HOCKEMA:

12 Q Mr. Andrade -- drade, please state and spell
13 your name for the record.

14 A My name is Anthony Andrade. First name
15 A-n-t-h-o-n-y. Last name A-n-d-r-a-d-e.

16 Q Thank you. Do you have a copy of your
17 testimony in front of you?

18 A I do, yes.

19 Q Do you have any corrections to make to that
20 testimony?

21 A I do.

22 Q Please proceed.

23 A On page 1-1 of my testimony, starting at line
24 13, I wrote:

25 The Commission should authorize 20,277,180

1 in test year 2026 and \$19,788,780 in test year
2 2027 to fund pipeline replacement projects.
3 Suburban proposes 30,723,000 and -- in 2026 and
4 \$29,983,000 in 2027.

5 And so what it should say is, starting again at
6 line 13:

7 The Commission should authorize \$20,277,180
8 in test year 2027 and \$19,788,780 in test year
9 2028 to fund pipeline replacement projects.
10 Suburban proposes \$30,723,000 in 2027 and
11 \$29,983,000 in 20 -- 2028.

12 The next correction is on page 1-10, starting
13 with the sentence on line 5:

14 The Commission should authorize \$20,277,180
15 in test year 2026 and \$19,788,780 in test year
16 2027. Suburban proposes \$30,723,000 in 2026
17 and \$29,983,000 in 2027.

18 That should say, starting again at line 5:

19 The Commission should authorize \$20,277,180
20 in test year 2027 and \$19,788,780 in test year
21 2028. Suburban proposes \$30,723,000 in 2027
22 and \$29,983,000 in 2028.

23 And I have a final correction. Starting on
24 this same page, on line 10, I stated:

25 Ratepayers would save \$10,445,820 in the

1 2026 rate base forecast and \$10,194,220 for the
2 2027 forecast if the Commission adopts this
3 recommendation compared to Suburban's proposal
4 of a 1.0 percent replacement rate.

5 That should say, starting at line 10:

6 Ratepayers would save \$10,445,820 in the
7 2027 rate base forecast and \$10,194,220 for the
8 2028 forecast if the Commission adopts this
9 recommendation compared to Suburban's proposal
10 of the 1.0 percent replacement rate.

11 And that is all the corrections.

12 Q Thank you. To the best of your knowledge, is
13 the information contained in these documents true and
14 correct?

15 A It is.

16 Q And to the extent you make statements to the
17 nature of judgment in these documents, do they represent
18 your best judgment?

19 A They do.

20 Q Do you sponsor these documents as your
21 testimony in this proceeding?

22 A Yes.

23 Q Thank you, Mr. Andrade.

24 MR. HOCKEMA: Your Honor, the witness is
25 available for cross-examination.

1 ALJ NOJAN: Okay. Thank you, Mr. Hockema.

2 For the purposes of this cross-examination,
3 I'll be marking the exhibit as PUBADV-AA-001, Report on
4 Pipeline Replacement, PFAS Treatment, San Jose Hills
5 Plant and Water Quality sponsored by Witness Anthony
6 Andrade from the Public Advocates Office.

7 (Exhibit PUBADV-AA-001 was marked for
8 identification.)

9 ALJ NOJAN: I will note that for this
10 particular exhibit, and after thinking about it, those
11 in the past that have had a good number of corrections
12 to the figures I'll be asking the Public Advocates
13 Office to submit a corrected version so that when we do
14 reference we won't have to look at the figures in the
15 transcript side by side so that -- those changes are
16 captured in the record, but for ease of reference, in
17 the citation, it would be -- I'll be making that known
18 at the end, but I wanted to note it now as well.

19 So with that being said, Ms. Dolqueist, the
20 witness is yours for cross.

21 MS. DOLQUEIST: Thank you, your Honor. Your
22 Honor, I also have an exhibit that I'll be using for
23 cross-examination that was circulated yesterday. This
24 is SWS-016, Water Main Break Rates in the US and Canada:
25 A Comprehensive Study.

1 ALJ NOJAN: Okay. I'm seeing -- we're -- okay.
2 I see one and then two for the other witnesses. Okay.
3 So let me go ahead and mark that as SWS-016. This is
4 Water Main Break Rates in the USA and Canada:
5 Comprehensive Study.

6 (Exhibit SWS-016 was marked for
7 identification.)

8 MS. DOLQUEIST: Thank you, your Honor.

9 CROSS-EXAMINATION

10 BY MS. DOLQUEIST:

11 Q Good morning, Mr. Andrade.

12 A Good morning.

13 Q I'm Lori Dolqueist, the attorney from Suburban,
14 and I have some questions for you regarding the document
15 that's been marked as PUBADV-AA-001. But first, I'd
16 like to ask some questions about your expertise. You
17 have a bachelor's degree in mechanical engineering; is
18 that correct?

19 A Yes.]

20 Q Okay. But you're not a licensed professional
21 engineer in the state of California, correct?

22 A Correct, I am not.

23 Q Okay. And you don't have any experience
24 managing capital projects for a water utility, do you?

25 A I do not.

1 Q Okay. And you don't have any experience
2 shutting off service to address water main breaks,
3 correct?

4 A I do not.

5 Q You don't have any experience communicating
6 with customers about how long service will be out due to
7 a main break, correct?

8 A I do not.

9 Q You don't have any experience responding to
10 customer concerns about lost business revenue from a
11 main break, correct?

12 A Correct.

13 Q You've never been part of a utility crew
14 working to restore water service on a holiday, have you?

15 A I have not.

16 Q And you've never been part of a utility crew
17 working to restore water service in the middle of the
18 night, have you?

19 A I have not.

20 Q And you've never been part of a utility crew
21 working to restore service in a busy commercial
22 district, have you?

23 A I have not.

24 Q Thank you.

25 Mr. Andrade, I want to talk a little bit about

1 the pipeline replacement program and Cal Advocates'
2 recommendations.

3 You propose a pipeline replacement rate of
4 0.66 percent per year for Suburban, right?

5 A I -- I propose a pipeline replacement of
6 0.66 percent per year starting in 2027 and 2028.

7 Q Thank you.

8 And you propose this because you believe it's
9 comparable to other utilities; is that correct?

10 A There were a number of factors I considered but
11 that is one of them.

12 Q Okay. And the Los Angeles Department of Water
13 and Power, which is also known as LADWP, that's one of
14 the comparable utilities, correct?

15 A Yes, that -- that was one of the utilities that
16 was selected by Suburban's consultant HDR in their
17 benchmarking program, and I looked at it for that
18 reason.

19 Q All right. And LADWP also plans to achieve a
20 replacement rate of 0.66 percent per year, correct?

21 A Yes.

22 Q Now, I want to turn to your report,
23 specifically page 1-5, lines 16 and 17, if you'd let me
24 know when you're there.

25 A I am there.

1 Q Okay. Now, in this you reference a national
2 average break rate of 25 breaks per 100 miles, correct?

3 A Correct, yes. I am referencing LADWP's
4 reference to that national average.

5 Q Okay. And I would like to turn to your report
6 Attachment 1-1, page 3, and electronically I think
7 that's page -- PDF page 46 if you're scrolling -- or
8 those who are -- who might be scrolling.

9 A I am there.

10 Q Okay. So this is the source of the national
11 average break rate of 25 breaks per 100 miles that you
12 cite in your testimony, correct?

13 A That is correct.

14 Q And did you review this 2017 water research
15 source cited here?

16 A I did search for it, and I believe this -- this
17 particular one on -- wait one second.

18 Yes, I -- in my response to Suburban's data
19 request, I believe that was -- that's been included as
20 Attachment 1 to Suburban's rebuttal by Jorge Lopez; it's
21 included there, and I identified that -- that Water
22 Research Foundation 2017 document as most likely being,
23 "Knowledge Portals: Asset Management: Breaks & Leaks:
24 FAQ's."

25 Q All right. Thank you.

1 Now, I'd like to bring to your attention the
2 document that has been marked as SWS-16, and this was
3 the one that was circulated previously. It's the water
4 main breaks in the USA and Canada, a comprehensive
5 study.

6 Do you have that handy?

7 A Yes, I do.

8 Q And you referenced the results of this study in
9 your report, correct?

10 A I did.

11 Q Now, if you could turn to page 34 of this
12 document, it says page 34 on the side. PDF page,
13 though, it's page 35.

14 A Okay, I am there.

15 Q Okay. And I am referencing to Figure 35,
16 "Overall Break Rates By Region."

17 Do you see that?

18 A Yes, I do.

19 Q And according to this, the national average
20 break rate is 11.1 breaks per 100 miles, correct?

21 A Yes.

22 Q Okay. And this is quite different than the 25
23 breaks per 100 miles cited by LADWP, correct?

24 A Yes, it is.

25 Q Did that -- seeing this discrepancy cause you

1 to doubt the LADWP reference?

2 A I did realize there was a discrepancy, yes.

3 Q Now, this also shows regional averages,
4 correct, Table -- or sorry -- Figure 35?

5 A It shows -- I'm sorry, could you repeat the
6 question?

7 Q It also shows regional overall break rates,
8 correct?

9 A Yeah. Yes, it does.

10 Q Okay. And one of the regions is Region 2,
11 correct?

12 A That is correct.

13 Q And is it your understanding that California is
14 part of Region 2?

15 A Yes, that is my understanding.

16 Q Okay. And the Region 2 average, as shown on
17 this, is 6.5, correct?

18 A Yes, according to the way it was calculated
19 or -- or tallied in this report by the Utah State
20 University, it is.

21 Q Okay. Now, going back to LADWP, it claimed to
22 have a break rate of 19.4 breaks per 100 miles; is that
23 correct?

24 A Yes.

25 Q So that is significantly higher than both the

1 national and regional average in this USU report,
2 correct?

3 A 19.4 is larger than the 11.1 national number in
4 the Utah State report and the 6.5 number in the -- in
5 the regional number for this report, and there may be an
6 explanation -- well, a small explanation for some of
7 that discrepancy.

8 Q Now, Suburban's break rate is also higher than
9 these regional and national averages, correct?

10 A Suburban's -- Suburban's break rate is 13; that
11 was measured in one year, and it happens to be the
12 average of -- the same as the average of five years, and
13 that 13 number is larger but close to that 11.1 number
14 here and smaller than various other regions but larger
15 than the region two number in this report.

16 Q Okay. I want you to turn to page 45 of this
17 report, and it's -- which is -- it says 40 -- has the
18 page number 45, but it says it's PDF page 46; and I am
19 looking in the middle of the page and the paragraph that
20 starts, "In 2018,"...

21 A Okay, I am there.

22 Q All right. And if you look at the third
23 sentence in this paragraph, it says:

24 Generally, most utilities target a one
25 percent annual replacement rate representing a

1 100-year replacement cycle.

2 Correct?

3 A That's what it says on this page of this
4 report.

5 Q And that is what Suburban is proposing in this
6 GRC, correct?

7 A That is correct. I was going to add that on
8 PDF page 5, and it's written on page 4 -- but as page 4,
9 it also says that other -- there's a bullet point in the
10 middle:

11 Pipe life estimates of 70 to 100 years
12 contrast with an average replacement schedule
13 of about 200 years.

14 So there's -- a different number other than
15 that one percent and annual replacement rate that it
16 says later in this report.

17 Q And is that 200-year what is actually being
18 done now or as compared to what utilities are working
19 towards?

20 A I belie -- yes, I believe it was referring to
21 what is currently being done now.

22 Q Okay. And it's not holding out that this
23 200-year standard is best for customers. It doesn't
24 make any claim like that, correct?

25 A Correct. It doesn't make claims that either

1 the 200-year or the one percent is best for customers.

2 Q Okay. And also it notes that the overall
3 assessment of water infrastructure condition in the U.S.
4 is not good, and that it's currently the grade as a C
5 minus; is that right?

6 A That is correct, but it doesn't discuss what
7 the metrics the American Society of Civil Engineers
8 used, and it doesn't discuss what the other assessments
9 for other infrastructure also given by American Society
10 of Civil Engineers are.

11 Q Okay. In the next paragraph on that page you
12 pointed out, it starts deteriorating. It says:

13 Deteriorating water mains are threats to
14 the physical integrity of distribution systems
15 causing adverse effects on flow capacity,
16 system pressure and water quality.

17 Do you agree with that statement?

18 A Generally, yes.

19 Q Okay. And then it also states:

20 In addition to maintenance requirements and
21 economic impacts, consequences of broken water
22 mains include local flooding, interruption of
23 water delivery, and damage to roads and private
24 property. These outcomes also negatively
25 affect a utility's customer satisfaction.

1 Did you consider those consequences in your
2 report?

3 A I did.

4 Q Now, I would like to move onto page 1-6 of your
5 report, specifically lines 9 and 10; if you could let me
6 know when you're there.

7 A What was the line number again?

8 Q Sure. It's page 1-6, and it's like lines 9 and
9 10. Basically, I believe that's where you reference the
10 partnership for safe water national service level goal?

11 A I am there.

12 Q Okay. And here you state that the goal is 15
13 water breaks per mile. Is that -- do you mean 15 water
14 breaks per 100 miles?

15 A Yes, that's -- that sounds right. 15 water
16 breaks per 100 miles.

17 Q Okay. And are you aware that this 15 water
18 breaks per 100 miles figure includes appurtenances.

19 A I -- I did read that in Suburban's rebuttal but
20 that is not how -- how it was referenced in -- in HDR's
21 report included in Suburban's initial testimony.

22 Q But that is what the Partnership for Safe Water
23 notes that it is -- that figure is based on
24 appurtenances, correct?

25 A It is. It is based on breaks on distribution

1 system including appurtenances.]

2 Q Okay. Now, Suburban's break rate of 13 breaks
3 per 100 mile does not include appurtenances; correct?

4 A I think I missed the -- the number you
5 mentioned --

6 Q Oh, sure.

7 A -- of Suburban's.

8 Q Yeah. Suburban, there is the 13 breaks per 100
9 miles.

10 That figure does not include appurtenances;
11 correct?

12 A That depends exactly how appurtenances is
13 defined. So appurtenances, I think, can mean main
14 fittings -- main valves. Yeah. But there -- it could
15 also mean in main joints. And I believe sometimes
16 appurtenances excludes joints and sometimes it doesn't.

17 Q So when Cal Advocates is making a reference to
18 a certain number of breaks per miles, how are you
19 defining that, with or without the appurtenances?

20 A Generally, without appurtenances but including
21 joints. And that's -- that is my understanding of how
22 it is defined by the American Water Works Association in
23 its manual. I can get that manual number. It's in
24 Suburban's testimony.

25 ALJ NOJAN: Okay. Let's go off the record.

1 (Off the record.)

2 ALJ NOJAN: Let's be on the record.

3 THE WITNESS: So that is American Water Works
4 Association Manual 36.

5 BY MS. DOLQUEIST:

6 Q Now, if you were to calculate Suburban's break
7 rate, including appurtenances, it would be higher than
8 13 breaks per mile; correct?

9 A Correct.

10 Q Okay. And I believe Suburban has testified
11 that its break rate, including appurtenances, is 34
12 breaks per 100 miles; correct?

13 A Correct.

14 Q Okay. And this is in comparison to the
15 Partnership for Safe Water's goal of 15 water breaks per
16 mile; correct?

17 A Correct. With the understanding that that's
18 not usually -- or that's not how it was used in the
19 initial testimony.

20 Q Mr. Andrade, I would like to move on to the
21 next subject, which is the issue of grants. And I'd
22 like to turn to page 2-11 of your testimony. In
23 particular, lines 9 to 11.

24 A I'm there.

25 Q Okay. Now, here, you claim that the Sativa

1 water system is a good candidate for their Water
2 Replenishment District, also known as WRD, of Southern
3 California's PFAS Remediation Program; correct?

4 A That's correct.

5 Q And to qualify for this program, Suburban would
6 have to release PFAS-related claims against WRD and
7 commit to not taking any positions that could result in
8 WRD being liable; correct?

9 A Yes. That -- that is how I -- how I read it --
10 how I understood it.

11 Q Okay. Do you think that releasing WRD from
12 reliability related to PFAS benefits Suburban's
13 customers?

14 A It may, yes. That I -- I'm not aware of
15 any -- any pending plans that Suburban may have
16 for -- for pursuing like -- pursuing action against WRD.

17 Q So since you are not aware of any actions
18 against WRD, can you truly evaluate whether releasing
19 liability would benefit customers?

20 A I cannot, but I do know that using -- that
21 other utilities have used this program, other utilities
22 regulated by the Commission.

23 Q Okay. Now, looking forward -- looking more
24 ahead, the -- with this program, Suburban would have to
25 repay any grant it gets from the WRD when it gets PFAS

1 litigation awards; correct?

2 A That -- that's correct.

3 Q And so if it did that -- if Suburban did that,
4 it would mean that the amount of litigation awards it
5 could use for its PFAS projects would be reduced by the
6 amount of the grant; correct?

7 A Yes.

8 Q Okay. Alternatively, Suburban could just apply
9 the litigation awards directly to a Sativa PFAS project;
10 correct?

11 A Correct. And I believe I -- I recommended that
12 action.

13 Q So the WRD does not grant -- does not increase
14 the amount of funds available to address PFAS in the
15 Sativa District, does it?

16 A It may or it may not.

17 Q If Suburban has to pay back the grant using
18 litigation proceeds in that circumstance, it would not
19 increase the overall amount of funds available; correct?

20 A I believe so. I'm not sure in the case if
21 it -- if it used the -- the funds -- the litigation
22 funds for -- for another project elsewhere what happens
23 in that case.

24 Q So -- but the -- if they -- if Suburban takes
25 this grant, if it gets litigation proceeds, it has to

1 pay -- it has to use that to pay back the grant; right?

2 A Yes. The -- that is, I believe, what it says.

3 Q So the end result would be no increase in the
4 amount of funds but actually release of liability for
5 WRD; correct?

6 A Correct. With the -- with the possible
7 difference that -- that the project would be -- the
8 project's impact to rate base would be reduced. And the
9 impact to rate base would then flow through to customers
10 instead of -- instead of receiving the litigation funds
11 through -- through a balancing and memorandum account.

12 Q You are -- are you aware that, for both grants
13 and litigation proceeds, Suburban is not able to earn a
14 return on those amounts in rate base? Is that correct?

15 A Yes. But I don't think that's getting to what
16 I'm saying. I believe, in Suburban's rebuttal, Suburban
17 stated that it would -- it would be receiving -- or
18 applying the litigation funds through its balancing and
19 memorandum accounts, so that does not sound like a
20 reduction to rate base.

21 Q So you believe, that because this will be done
22 through a balancing account, somehow Suburban will be
23 able to earn a return on the litigation proceeds?

24 A No, that's not what I'm saying.

25 Q But again, the amounts, no matter whether they

1 go through a litigation -- a balancing account or a
2 memorandum account, the proceeds would have to be used
3 to pay back this grant; correct?

4 A Correct.

5 MS. DOLQUEIST: No further questions, your
6 Honor.

7 EXAMINATION

8 BY ALJ NOJAN:

9 Q Mr. Andrade, in this -- the latter few
10 questions, what is the advantage of your recommendation?

11 A Yes. So the -- the projects -- well, first of
12 all, I would like to say this section that we referred
13 to on page 2-11, it is the second grant that I discuss.

14 I also discuss another grant, the DWSRF, that's
15 the Drinking Water State Revolving Fund
16 emergency -- emerging contaminants. And that is another
17 grant that Suburban could apply for and then receive
18 that -- that grant -- grant money and apply it as a
19 contribution in aid of construction reducing the overall
20 project cost and reducing the impact of the project to
21 ratepayers.

22 So the second project -- the second grant
23 program I discuss was for DW -- I'm sorry. WRD, Water
24 Replenishment District of Southern California. And so
25 under the scenario that -- that I'm discussing in my

1 testimony in -- for this project, the -- Suburban would
2 receive this grant and reduce rate base immediately by
3 applying this grant as contributions in aid of
4 construction.

5 The other scenario, if this grant and the other
6 one is not -- are not pursued and are not accepted, that
7 then -- then suburban could apply the litigation in
8 funding. But in that case, I believe the rate base
9 would be increased and then the reduction would be to
10 revenue requirement. So overall, I do not think they
11 are the same benefit to ratepayers.

12 Q You are saying that the grant would not -- or
13 rather, the grant would yield benefits that -- to
14 ratepayers that the alternative would not; is that
15 right?

16 A Yes, it's a separate process or mechanism.

17 Q And based on your understanding, to what extent
18 do you believe that the grant would be awarded based on
19 the selection criteria and how well Suburban fits the
20 criteria?

21 A It -- so there are two -- two grants. The
22 first one is the Drinking Water State Revolving Fund. I
23 believe it has a very high chance. It is specifically
24 for small or disadvantaged communities, and the proposed
25 project this grant would be applied to is a -- is a

1 treatment system in Sativa. The Sativa water system
2 serves a population of 4,339 people. Also, that makes
3 it a small community. And I believe it has -- yes. I
4 wrote that -- yeah. I wrote that Suburban identified
5 Sativa as meeting the conditions for a disadvantaged
6 community. So for this -- this project -- for this
7 program, it does fit the criteria, to the best of my
8 knowledge.

9 And then for the second one, Water
10 Replenishment District, Suburban's Sativa system draws
11 from the central basin. This is the same central basin
12 that other water utilities regulated by -- by the
13 Commission, such as California Water Service Company and
14 San Gabriel Valley Water Company, draw from. And both
15 of these companies have executed a funding agreement
16 with Water Replenishment District.]

17 Q Are you recommending that the balancing or
18 memorandum accounts be denied?

19 A No. I -- I'm saying specifically for this --
20 for this project -- or -- if the Drinking Water State
21 Revolving Fund Grant is not -- is not granted, then
22 Suburban could pursue the Water Replenishment District
23 Grant and then -- and would not have to -- or would
24 reduce rate base by con -- contributions in aid of
25 construction and would not have to use the balancing and

1 memorandum account mechanism.

2 Q And what's your understanding of the timeline
3 for that grant being awarded?

4 A I believe this was discussed in -- in a
5 separate rate case. And it does -- I think from the
6 time when it was considered -- but I don't know the --
7 when -- the application date. That might be in one of
8 these attachments. It could take one or two years.

9 Q Okay. And -- so in the interim period, what
10 would your recommendation be while, say, that grant is
11 pending?

12 A Well, I recommend that the application for this
13 pro -- for this grant funding is done immediately. This
14 project -- this project is scheduled for construction, I
15 believe, in 2028. So for the Drinking Water State
16 Revolving Fund Grant, I believe -- well, they generally
17 do not provide grants to projects that have begun
18 construction. So construction would have to wait until
19 that grant is accepted.

20 ALJ NOJAN: Mr. Hockema, the witness is yours
21 for redirect.

22 MR. HOCKEMA: Thank you, your Honor. No
23 redirect.

24 ALJ NOJAN: Mr. Andrade, you're dismissed from
25 the stand.

1 Let's go off the record.

2 (Off the record.)

3 ALJ NOJAN: Let's be on the record.

4 Mr. Rubang, I will be pulling up the witness
5 attestations. Please read them and insert your name in
6 the appropriate place.

7 MR. RUBANG: Excuse me. Thank you, your Honor.

8 I, Andrew Rubang, do solemnly state under
9 penalty of perjury that the testimony I give in the case
10 now pending before this Commission shall be the truth,
11 the whole truth and nothing but the truth;

12 I, Andrew Rubang, attest I will testify based
13 on my own knowledge and memory free from external
14 influences or pressures;

15 I, Andrew Rubang, attest I will adhere to all
16 formal requirements of testifying under oath including
17 the prohibition against being coached;

18 I, Andrew Rubang, attest I will only refer to
19 materials provided by the parties, exhibits premarked
20 and identified by the parties and previously shared with
21 opposing party;

22 I, Andrew Rubang, attest I will not make any
23 recording of the proceeding. I attest I understand that
24 any recording of the proceeding held by Webex, including
25 screenshots or other visual copying of a hearing, is

1 absolutely prohibited;

2 I, Andrew Rubang, attest that I understand that
3 a violation of these prohibitions may result in
4 sanctions including removal from the evidentiary
5 hearing, restricted entry to future hearings, denial of
6 entry of future hearings or any other sanctions deemed
7 necessary by the Commission;

8 I, Andrew Rubang, attest I will not engage in
9 any private communications by phone, text or email or
10 any other mode of communication while under oath and
11 being examined;

12 If I, Andrew Rubang, experience any attempts to
13 tamper with my witness testimony, I will report -- I
14 will report the occurrence to the presiding officer
15 immediately.

16 ALJ NOJAN: And I am seeing two exhibits
17 sponsored by you, Mr. Rubang. I believe they are the
18 same save that one of them is a corrected version. So
19 what I'll be doing is I'll have us refer to the
20 corrected version, and I'll be marking this exhibit as
21 PUBADV-AR-001A. This is the Report on Balancing and
22 Memorandum Accounts, Special Request No. 1, 9, 10 and 12
23 (corrected) sponsored by Witness Andrew Rubang.

24 (Exhibit PUBADV-AR-001A was marked for
25 identification.)

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ANDREW RUBANG,

called as a witness by Public Advocates
Office, having been sworn, testified as
follows:

ALJ NOJAN: Mr. Hockema, the witness is yours
for direct.

MR. HOCKEMA: Thank you, your Honor.

DIRECT EXAMINATION

BY MR. HOCKEMA:

Q Mr. Rubang, please state and spell your name
for the record.

A Andrew Rubang. Andrew is A-n-d-r-e-w. Rubang,
R-u-b-a-n-g.

Q Do you have a copy of the document that has
just been identified as PUBADV-AR-001A in front of you?

A Yes. But I think your Honor made a mistake by
saying Special Request 12. It's Special Request 11. 1,
9, 10 and 11.

ALJ NOJAN: Let's be off the record.

(Off the record.)

ALJ NOJAN: Let's be on the record.

The title of the corrected exhibit should read
"Special Request 11," not "12."

Mr. Hockema, please continue.

MR. HOCKEMA: Thank you, your Honor.

1 Q Okay. Mr. Rubang, please confirm that you have
2 the document identified as PUBADV-AR-001A in front of
3 you.

4 A Yes.

5 Q Do you have any changes or corrections to this
6 document?

7 A No.

8 Q To the extent that you make statements to the
9 nature of judgment in these doc -- in this document, do
10 they represent your best judgment?

11 A Yes.

12 Q Do you sponsor this document as your testimony
13 in this proceeding?

14 A Yes.

15 Q Thank you.

16 MR. HOCKEMA: Your Honor, this witness is
17 available for cross-examination.

18 ALJ NOJAN: Ms. Dolqueist, the witness is yours
19 for cross.

20 MS. DOLQUEIST: Thank you, your Honor. I also
21 distributed two exhibits to be used during this
22 cross-examination. The first is SWS-014, Mandatory
23 Conservation Memorandum Account Preliminary Statement,
24 and the second is SWS-015, Rule No. 14.1, Water Shortage
25 Contingency Plan.

1 ALJ NOJAN: Okay. Let's mark these exhibits
2 now. I'll mark SWS-014 as SWS-014, the Mandatory
3 Conservation Memorandum Account Preliminary Statement
4 and SWS-015 as SWS-015, Rule No. 14.1, Water Shortage
5 Contingency Plan.

6 (Exhibit SWS-014 was marked for
7 identification.)

8 (Exhibit SWS-015 was marked for
9 identification.)

10 MS. DOLQUEIST: Thank you, your Honor.

11 CROSS-EXAMINATION

12 BY MS. DOLQUEIST:

13 Q Good morning, Mr. Rubang.

14 A Good morning.

15 Q I'm Lori Dolqueist, attorney for Suburban, and
16 I have some questions for you regarding the document
17 that has been marked as PUBADV-AR-001A. I'd like to
18 first talk about the mandatory conservation memorandum
19 account, which is also known as the MCMA. And you
20 recommend that this should be closed, correct?

21 A Correct.

22 Q And your reason for this recommendation is that
23 it's been inactive since 2023, correct?

24 A Correct.

25 Q Mr. Rubang, I'd like to turn your attention to

1 SWS-014, which is the preliminary statement for the
2 mandatory conservation memorandum account.

3 Do you have that document?

4 A Give me a second. Make sure I do. Yes.

5 Q And this is a Suburban tariff sheet, correct?

6 A Yes, correct.

7 Q And it's the preliminary statement for the
8 MCMA, correct?

9 A Correct.

10 Q Did you review this in preparation for your
11 report?

12 A I did.

13 Q Okay. And according to this, the purpose of
14 the MCMA is to track incremental costs and penalties
15 associated with the implementation of mandatory
16 conservation and water rationing moratorium through Rule
17 14.1 and Schedule 14.1, correct?

18 A That's what it states, yes. Correct.

19 Q And the applicability states that it is -- if
20 you look under Section 2, small Roman Numeral ii(a):

21 Incremental operating and administrative
22 costs associated with the implementation of
23 mandatory conservation measures under Rule 14.1
24 and Schedule 14.1.

25 Correct?

1 A That's what it states, yes.

2 Q All right. Are you familiar with Rule 14.1?

3 A Barely. Not off top of my head. I'd have to
4 actually read it.

5 Q All right. If you could turn to SWS-015. Do
6 you have that document?

7 A That would be the second one you said?

8 Q Yeah. Mm-hmm.

9 A Okay. Yes.

10 Q And you see up there it says, "Rule No. 14.1,
11 Water Shortage Contingency Plan"?

12 A Yes.

13 Q And this is a Suburban tariff sheet, right?

14 A It appears to be.

15 Q Okay. Can you review that first paragraph
16 under Water Shortage Contingency Plan heading?

17 A Starting with "Suburban Water System's water
18 supply"?

19 Q Mm-hmm.

20 A You want me to read an entire par...

21 Q Just review. I just wanted to make sure you've
22 had a chance to review that language. You don't need to
23 read it.

24 A Oh. Okay. Okay. Yes. I read it once before.

25 Q Okay. Now, are you recommending that Suburban

1 remove its water shortage contingency plan?

2 A Yes.

3 Q So you're stating that this tariff rule should
4 be deleted?

5 A Removed, yes, out of the (inaudible).

6 Q And is your statement then that Suburban does
7 not need a plan to address water supply interruptions?

8 A That is not what I'm saying. Actually, no.
9 No.

10 Q Then are you stating that there's a different
11 plan that should be implemented in place of Rule 14.1?

12 A Absolutely not. No. That's not what I'm
13 saying.

14 Q So I just asked if you were gonna -- if Rule
15 14.1 should be removed, and you said yes.

16 A Correct.

17 Q And so without Rule 14.1, there is no water
18 shortage contingency plan?

19 A Correct.

20 Q Okay. Now, without the water shortage
21 contingency plan, there is no plan for Suburban to
22 address interruptions or reductions due to drought or
23 catastrophic events, correct?

24 A Correct. I also want to state that we are no
25 longer in a state of emergency drought. So that is

1 correct.

2 Q Okay. Are you able to predict whether Suburban
3 will be in a state of emergency drought within this rate
4 case period?

5 A I don't think anyone can predict that, but no,
6 I'm not present -- definitely not me.

7 Q Okay. And so can you predict whether there
8 will be any water shortages due to earthquake or fire in
9 the rate case period?

10 A No. But I do believe that this memorandum
11 account was specific to a governor's state of emergency,
12 which has expired. So I think that for anything in the
13 future, by all means, a memorandum account may be
14 appropriate, but as of this particular one, my
15 understanding is that it -- it was used appropriately at
16 the time, and it's time to move on and close the
17 account.

18 Q So what I'm asking about is not the memorandum
19 account at this point. I'm talking about this Rule 14.1
20 that sets forth the process for how -- what Suburban is
21 supposed to do when one of these catastrophic conditions
22 occurs. That's what you're suggesting should be
23 deleted?

24 A Only according to the memorandum account. I
25 don't know anything about this account that you're

1 talking about, but if there's a correlation between the
2 memorandum account and this account and if that is the
3 case, that this memorandum account deletes the other
4 tariff, that is a different issue. But I'm just
5 discussing about this mandatory conservation memorandum
6 account.

7 Q So the mandatory conservation memorandum
8 account, if you look back to SWS-014 and you see its
9 purpose is implementation of mandatory conservation and
10 water rationing pursuant to Rule 14.1, right?

11 A Correct.

12 Q Okay. So what I'm asking you is, if you look
13 next to Rule 14.1, should that rule remain in effect?

14 A I don't know, but my understanding is that if
15 you remove mandatory conservation memorandum account,
16 that's done with. I don't know what it -- happens to
17 the other tariff we're talking about. Because the
18 memorandum -- conservation memorandum account is
19 specifically about implementation to address Rule
20 No. 14, at least that's my understanding. So if we
21 remove the memorandum account -- and my understanding is
22 that that shortage account possibly could still be
23 there.

24 Q So let me get this straight. You want to keep
25 this contingency plan or not? I can't understand your

1 answer.

2 A Well, I -- that's not -- that is not my
3 expertise in terms of what I read. I did not read about
4 the Rule No. 14. So that's -- that's up to the
5 Commission to decide if the shortage -- the -- that
6 other account that we're addressing right now is
7 appropriate. But my -- my testimony is specifically on
8 the MCMA.

9 Q The MCMA, which is -- the purpose is to --

10 A Implement.

11 Q -- Rule No. 14.1, which -- but you're not
12 familiar with Rule No. 14.1?

13 A Only from what I read, and it looks like a
14 great policy.

15 Q Right. So with respect to costs related to,
16 say, a drought or a catastrophic event, is Suburban able
17 to forecast those costs in this general rate case?

18 A No. That's what memorandum accounts are for.
19 If you cannot forecast them, then that would be an
20 appropriate use of a memorandum account, absolutely.

21 Q And is Suburban able to determine whether such
22 an event would occur so that it's able to ask for a
23 memorandum account in advance?

24 A No. But that's the point of a memorandum
25 account. It's supposed to be that when it occurs they

1 can ask for it immediately, and the Commission can make
2 the -- band authority to grant that beyond the GRC
3 understanding that we can't forecast these type of
4 emergencies.

5 Q Okay. So do you know how long the process
6 would take of Suburban preparing an advice letter, that
7 advice letter being subject to review and then possibly
8 approved by the Commission's Water Division?

9 A The timing of it?

10 Q Yeah.

11 A No. But I believe it is on a more expedited
12 advice letter. That's my understanding. Because the
13 Commission does a great job of understanding the
14 emergencies, and that's, again, what memorandum accounts
15 are for. It's for the emergencies, in my opinion.

16 Q So you're saying that if an emergency occurred,
17 then such an memorandum account would be justified?

18 A Absolutely.

19 Q Okay. But you want Suburban and the Water
20 Division and the Public Advocates Office to go through
21 that process of submitting it for review rather than
22 just keeping the memorandum account established?

23 A Absolutely. Absolutely. There is a difference
24 between a GRC process and a memorandum account in terms
25 of ratepayer benefits let alone rate -- mechanisms of

1 rate recovery, and I think that is the purpose of a
2 memorandum account is that it is --

3 ALJ NOJAN: Okay. Go ahead and finish,
4 Mr. Andrade.

5 THE WITNESS: Oh. Sorry, your Honor. I'm
6 done.

7 BY MS. DOLQUEIST:

8 Q So the only difference --

9 ALJ NOJAN: One -- sorry. One moment, please.
10 I'm going to ask Mr. Andrade, let Ms. Dolqueist finish
11 her question before you respond. I want the record to
12 reflect the entirety of each of your respective
13 responses and questions.

14 Ms. Dolqueist.

15 BY MS. DOLQUEIST:

16 Q So just the sum of it, sounds like we're both
17 in agreement that a memorandum account would be
18 justified in this type of situation; is that correct?

19 A Well, can you define that, "in this type of
20 situation."

21 Q Sure. A water shortage due to drought or a
22 catastrophic event.

23 A Correct.

24 Q Okay. And the only difference is that Suburban
25 says that this account should be -- remain open so that

1 it's available immediately, and you state that Suburban
2 should have to ask for it and have it approved by the
3 Water Division?

4 A Because every catastrophic event is different.
5 So I do want to be clear that the previous catastrophic
6 event appeared to be appropriate for a memorandum
7 account, and the next event, though Suburban may believe
8 so, I think it -- that would be up to the Commission to
9 make that decision if it's the ca -- the, quote,
10 unquote, catastrophic event is -- is appropriate for
11 memorandum account treatment.

12 Q Now, did you review the resolutions that
13 establish this memorandum account?

14 A I did.

15 Q And did you review the resolutions that
16 established the water shortage contingency plan?

17 A Water shortage contingency plan. No, I did
18 not.

19 Q All right. No further questions in that area.

20 What I'd like to turn to now is page 1 --

21 ALJ NOJAN: One moment, please.

22 MS. DOLQUEIST: Oh. Sure.

23 EXAMINATION

24 BY ALJ NOJAN:

25 Q I have some questions for the witness on that

1 issue. So, Mr. Rubang, what is the -- what is the
2 advantage of closing this account and reopening it upon
3 request?

4 A Thank you for that question, your Honor. Our
5 understanding from the Public Advocates Office is that
6 memorandum accounts are appropriate in emergencies. The
7 closing of this account brings back all -- all
8 ratemaking back to the general rate case. There's a
9 bigger issue to bring back ratemaking back to the
10 general rate case, such as -- such as understanding
11 transparency or allowing intervenors to address a rate
12 increase or even the volatility of rates.

13 And so if we close this account particularly
14 and any account that is deemed to be used appropriately,
15 then we can go back to -- for the Commission to decide
16 if there's another appropriate use.

17 And we -- at Public Advocates Office, we
18 recognize that droughts may be more often coming down
19 the pike than not in California, but that doesn't
20 necessarily mean just because it's a drought a
21 memorandum account treatment is appropriate. And I
22 think the Commission should have that authority to
23 decide when it is appropriate.

24 Q So Mr. Rubang, do you believe that the
25 resolution and other directives that provide the

1 parameters for that memorandum account are inadequate?

2 A If we're talking about this one specifically,
3 your Honor, Resolution W-5000, that -- and that's why I
4 brought up the state of emergency. That was particular
5 to the state of emergency. So until there's another
6 state of emergency, I think the Commission should then
7 look back. But if this account is left on their books,
8 it is possible that Suburban would believe that any
9 drought -- and that could be broadly defined -- any
10 drought --

11 Q Mr. Rubang, I'm looking for a "yes" or a "no."
12 Do you believe the parameters to be inadequate?

13 A To be inadequate? I think -- I think it's
14 adequate.

15 Q You think it's adequate?

16 A That is correct.

17 Q Okay. Do you believe the level of review done
18 by the Commission's Water Division to these advice
19 letters is inadequate?

20 A The reviews, no. I think they do a fantastic
21 job. It's adequate.

22 Q Okay. So if you think that the parameters of
23 the memorandum account which specify what type of costs
24 are to be included or may be included for consideration
25 and they are subject to a review by Water Division when

1 the advice letter is filed, I'm not entirely sure what
2 the efficiency would be in terms of having them request
3 it at a later date?

4 A Your Honor, what -- what I hear from your
5 question, at least I believe it to say that therefore
6 the Water Division should have an end date, because I
7 don't think the Commission wants this in perpetuity.

8 Q Mr. Rubang, I'm considering the efficiency of
9 having this request come before the Commission again
10 against the likelihood of a disaster or whatever
11 criteria is appropriate for recording this account. And
12 so I'm asking -- I suppose my question is -- in this
13 scenario, I'm not understanding what the problem is. If
14 the costs that are to be recorded are, in your
15 estimation, adequately specified and the level of review
16 that follows the request to recover those costs to be
17 adequate, I don't understand what the problem is.

18 A Oh. I'm sorry, your Honor. I misunderstood.
19 Because you said "the level of review." Initially, I
20 think you -- I thought you talked about the review
21 coming from Water Division. Your Honor, the review
22 comes from the Public Advocates Office, and that's where
23 it's difficult.

24 Q No. My question initially was Water
25 Division -- depending on the tier of the advice letter,

1 Water Division is the first industry division or
2 industry staff that reviews this. So my question is, do
3 you feel that level of review by Commission staff to be
4 inadequate?

5 A No, your Honor. I do not. Sorry. May I add
6 one? I think -- cuz maybe I'll answer the question. I
7 do believe when a cata -- catastrophe event occurs, I do
8 believe the Commission is well-equipped to -- to address
9 it.

10 Q Your recommendation to close this account and
11 have it reviewed upon request, I'm not -- I'm not sure I
12 understand the advantage of having that if the system in
13 place seems to be adequate both in terms of defining the
14 type of costs that could be considered for recovery as
15 part of these accounts and also the process in place to
16 review these costs.

17 So I'll give you one more opportunity to
18 respond to that, if you'd like. But I believe I've, for
19 the most part, heard your thoughts on this. So we can
20 move on if you don't have anything new to add.

21 A Yeah. And the last thing I would say, your
22 Honor, is that a memorandum account reasonableness is
23 much harder than the GRC process reasonableness.
24 Well -- yeah. Review.

25 Q But I will say that my understanding is you're

1 not suggesting that the request for the account to be
2 reopened would be in a GRC but, rather, at whatever
3 point a disaster may happen. So how does that tie into
4 the GRC?

5 A Affordability in ratemaking, your Honor. The
6 concept is that in a GRC process we have the ability to
7 provide ratepayers some predictability and -- and -- and
8 then -- which as -- whereas, if you use memorandum
9 accounts more often, then there are a lot more
10 volatility with rates, and that's not to say that we're
11 not -- we're not against it. Again, it would have to be
12 just appropriate to, quote, unquote, the catastrophe,
13 and I think that is -- that would be reasonable.

14 ALJ NOJAN: Mr. Hockema, the witness is yours
15 for redirect.

16 MS. DOLQUEIST: I'm sorry. I was just done
17 with that area of cross. I --

18 ALJ NOJAN: Oh. I'm sorry. I -- you know
19 what? Ms. Dolqueist, please resume cross.

20 MS. DOLQUEIST: Okay.

21 Q Mr. Rubang, actually, just to follow-up briefly
22 on what was said, if this memorandum account remains
23 open and a catastrophe occurs in the future, Cal
24 Advocates will have the opportunity to review those
25 costs for reasonableness in future rate cases, correct?

1 Q Okay. I would like to turn to Attachment 3 of
2 your report, where you provide a little more details on
3 these. If you can go -- I am looking specifically at
4 page 2, Table 2.

5 A Okay.

6 Q Okay. And I want to look specifically at items
7 9, 10 and 11 of this table. These are all interim rates
8 memo accounts, correct?

9 A Correct.

10 Q And for -- these are for Suburban's last three
11 GRCs?

12 A Correct.

13 Q Now, under the Public Utilities Code, if a
14 Commission decision isn't effective by the first day of
15 the first test year, the water utility may file a tariff
16 implementing interim rates; is that correct?

17 A I believe so.

18 Q Okay. And these interim rates are subject to
19 refund, and there are -- can be adjusted upward or
20 downward, correct?

21 A And surcharges, correct. Oh, no -- yeah.
22 Interim rates, yeah.

23 Q Okay. And are you aware that in requesting
24 interim rates, the water utility must show that any
25 delay in the proceeding is not due to its own actions?

1 A I am sorry. Can you repeat that?

2 Q Are you aware that when a water utility
3 requests interim rates, it must show that any delay in
4 the proceeding is not due to its own actions?

5 A No, I did not know.

6 Q Okay. So I want to look at the first account
7 there. This is for the GRC A.17-01-001.

8 And are you aware that the decision in that
9 proceeding, which was D.19-05-029, was nearly a
10 year-and-a-half late?

11 A No, I didn't know that.

12 Q Okay. And then, for the next proceeding, that
13 was A.20-03-001, are you aware that the decision in that
14 proceeding, D.21-11-024, was approximately seven months
15 late?

16 A No.

17 Q Okay.

18 A I did not know that.

19 Q For Suburban's last GRC, which was A.23-00 --
20 A.23-01-001, are you aware that that decision,
21 D.24-12-030, was nearly a year late?

22 A To some degree, but yeah, no, not to that
23 point, yeah.

24 Q Okay. Now, if you were to take these three
25 accounts together and combine them, the balance would

1 be, 9,821,327, correct?

2 A If that is your math, I -- I would have to
3 trust you on your math.

4 Q No reason to doubt that, does that look --
5 eyeballing it looks like it might be about correct?

6 A Yeah. Sure, yeah.

7 Q All right. Now I want the move over to page 1,
8 Table 1, to look at these accounts; and this is --
9 you're still in Attachment 3, but it's page 1, Table 1.

10 A Oh, page 1, oh gotcha, okay. Correct, okay.

11 Q All right. So, here, it says when you look at
12 these accounts that Suburban sought to interim -- to
13 amortize these interim rate balances through Advice
14 Letter 407-W-A, correct?

15 A Yes.

16 Q Okay. And Cal Advocates protested 407-W-A and
17 urged the Commission to suspend the Advice Letter,
18 correct?

19 A Oh, I -- I don't know. I was not that on that.
20 I don't -- I don't know what happened to that Advice
21 Letter.

22 Q Okay. But since it's been suspended, Suburban
23 doesn't have the ability to currently amortize these
24 amounts, correct?

25 A I don't -- I don't know. I don't know how that

1 works, the Advice Letter suspension.

2 Q So what is your tab -- what are you saying in
3 your Table 3(sic), page 1, Table 1 regarding these
4 accounts?

5 A Table 3(sic), page 1, Table 1 with these three
6 accounts? That was the remarks from, I believe, I just
7 copied and pasted from the workpapers or whatever was
8 prov -- oh, I got that from a DR.

9 Q Okay.

10 A That was -- if I am not mistaken.

11 Q So it's your understanding, however, that if an
12 Advice Letter suspended, the Advice Letter seeking
13 recovery, then Suburban can't recover them currently, is
14 that -- is that how it works?

15 A I don't understand -- I -- I don't do Advice
16 Letter suspensions. I -- I don't know.

17 Q Okay. And you're not familiar at all with the
18 Advice Letter process despite providing testimony on
19 balancing and memorandum accounts?

20 A I am familiar. I --

21 Q -- but not --

22 A -- but not suspension.

23 Q Not suspension, okay.

24 No further questions, your Honor.

25 ALJ NOJAN: Mr. Hockema, the witness is yours

1 for redirect.

2 MR. HOCKEMA: Your Honor, no redirect.

3 Thank you.

4 ALJ NOJAN: Let's be off the record.

5 (Off the record.)

6 ALJ NOJAN: Let's be on the record.

7 Mr. Rubang, you're dismissed from the stand.

8 THE WITNESS: Thank you, your Honor.

9 ALJ NOJAN: Let's be off the record.

10 (Off the record.)

11 ALJ NOJAN: Let's be on the record.

12 We are returning from a brief recess, and we
13 will be hearing from parties on closing arguments.

14 So the order that I am going to have us follow
15 is I will have Ms. Flemming from CalWEP go first, then
16 we will hear from Ms. McKenna, then we will hear from
17 Ms. Dolqueist and we will hear from Mr. Hockema at the
18 end.

19 So, Ms. Flemming, if you're ready, please
20 proceed.

21 MS. FLEMMING: Thank you. Thank you for the
22 opportunity to address this proceeding.

23 My name is Tia Flemming, and I am the executive
24 director at the California Water Efficiency Partnership.
25 I just want to start with a word about why I am here

1 today.

2 I run a statewide nonprofit that works with
3 more than 240 urban water suppliers across California.
4 On any given day, my staff and I are helping utilities
5 build and sustain water efficiency programs; that means
6 supporting agencies as they navigate an expanding set of
7 conservation requirements, as they work through new
8 compliance obligations as they try to maintain the
9 institutional capacity to do all of this without
10 dropping the ball on programs that are already
11 delivering results.

12 The regulatory landscape California's water
13 agencies are operating in today is more demanding than
14 it was five years ago, and it's not getting any simpler.

15 The Public Advocates Office made a
16 straightforward argument. Conditions look better,
17 customers have already cut back and rate design will
18 carry the load from here. I understand the appeal of
19 that argument, but I think it completely misreads what
20 conservation actually is in California right now.

21 I was honestly pretty shocked when I read the
22 argument, and I felt like CalWEP had no choice but to
23 take time out of supporting water suppliers to come and
24 intervene as a party in this case.

25 Conservation is not a drought response program

1 that you can turn off in dry years -- or turn on in dry
2 years and pause in wet years. It's demand management
3 infrastructure.

4 The operational capacity that allows utility to
5 stabilize water use over time, support customers and
6 making lasting changes and maintain the savings that
7 they have already achieved is done through ongoing
8 support.

9 When that infrastructure is allowed to atrophy,
10 savings erode. Customer turnover, landscape changes,
11 population growth, additional factors, these are all not
12 hypothetical pressures. They are ongoing and the work
13 against conserva -- efficiency gains -- and they work
14 against efficiency gains that took years to build.

15 The whole premise behind making conservation a
16 way of life is that conservation and efficiency become
17 permanent programs baked into the infrastructure of
18 every urban water supplier in the state. It's not a
19 destination or a checklist; it is active and ongoing
20 programming.

21 The April 1st snowpack data is already on the
22 record. This year's measurements at fill-up stations
23 was the second lowest ever recorded. One year after,
24 PAO is pointing to reservoir conditions as evidence that
25 conservation programs are no longer necessary, but this

1 kind of year-to-year variability is exactly what
2 conservation programs are designed to manage.

3 California, we're moving towards a more
4 volatile hydrologic future, not a more stable one; and
5 in this environment, the value of sustained demand
6 management only increases.

7 I also just want to briefly address the cost
8 question directly, because PAO has framed conservation
9 funding as a burden on ratepayers. Our research says
10 otherwise. Our work with the Alliance for Water
11 Efficiency including a 2024 analysis we did with Cal
12 Water Service found that customers across Cal Water
13 Service's 24 service districts face bills 1.2 to
14 20.5 percent higher without the conservation investments
15 those utilities made. We've made similar finding with
16 LADWP and other communities across the state and nation.

17 Conservation does not raise bills over time;
18 the absence of conservation does because deferred demand
19 management accelerates the need for new supply and new
20 infrastructures that ratepayers ultimately fund.

21 I recognize that administrative law judge and
22 the Commission has to balance competing interests, and I
23 understand that some budget has been preserved for
24 compliance-related work and that is totally appropriate,
25 but the programs at issue here that were specifically

1 called out -- customer education, technical assistance,
2 landscape outreach, those aren't overhead. They are how
3 utilities keep customers engaged, keep savings from
4 slipping and build the kind of institutional capacity
5 that California's water future is going to require.

6 So CalWEP's position is that suspending these
7 programs would be inconsistent with where California is
8 heading and ultimately more costly to ratepayers than a
9 modest investment being proposed.

10 So we urge the authorization of Suburban's
11 conservation budget.

12 Thank you very much for your time. That
13 concludes my testimony. Sorry, I don't know the -- all
14 the exact words I am supposed to say.

15 ALJ NOJAN: Ms. Flemming, do you have data on
16 or metrics on the efficacy of the conservation programs
17 relative to price signals that are incurred by or
18 demonstrated through higher rates?

19 MS. FLEMMING: I am not totally sure I
20 understand your question. Can you repeat it?

21 ALJ NOJAN: Do you have any data that
22 quantifies the efficacy of conservation programs
23 relative to the efficacy of higher rates in terms of
24 inducing conservation?

25 MS. FLEMMING: I do not recall off the top of

1 my head. I know we have research that is showing how
2 water efficiency can help keep rates low, and we have
3 research on rate design being one piece of that.

4 I think when we look at the holistic body of
5 research, we see that is a combination of both that
6 continues to drive savings down.

7 ALJ NOJAN: Okay. Is any of that included in
8 the testimony that was submitted from CalWEP?

9 MS. FLEMMING: Yeah, I -- we -- we cited
10 several studies that point to -- point to those points.

11 ALJ NOJAN: Okay. Thank you.

12 MS. FLEMMING: Point to those points, sorry.

13 ALJ NOJAN: Okay. Let's hear from Ms. McKenna.

14 MS. MCKENNA: Thank you, your Honor. I am
15 going to start (inaudible) --

16 ALJ NOJAN: Let's be off the record.

17 (Off the record.)

18 ALJ NOJAN: Let's be on the record.

19 Okay. Ms. McKenna, we will hear from you now.

20 MS. MCKENNA: Okay. Thank you, your Honor.

21 I wanted to start off with a brief thanks for
22 the diligence and active listening and questioning that
23 you have shown in managing this proceeding and thank you
24 for this opportunity to present closing arguments. Your
25 attention has not gone unnoticed, and it is appreciated.

1 CWA thanks you for your oversight of the matter
2 and for keeping the proceeding on schedule as timely
3 decisions are very important for these water utility
4 rate cases.

5 The California Water Association is a trade
6 organization representing more than 90 water utilities
7 operating within California serving more than 6 million
8 customers within the state.

9 CWA advocates on water policy before the
10 legislature and regulatory agencies including the State
11 Water Resources Board and this Commission. CWA provides
12 a forum for member utilities to share best practices and
13 support the delivery of safe, reliable water service to
14 customers.

15 While Suburban, the applicant in this
16 proceeding, is a member of CWA, CWA is not in this
17 proceeding to represent Suburban's interests rather
18 CWA's focus is on the subset of issues that could have
19 broader implications for water operators within the
20 state.

21 Specifically, CWA is in this proceeding to
22 address issues on decoupling, conservation planning and
23 plant retirement. CWA supports Suburban's proposal to
24 implement a decoupling mechanism now that it is moving
25 to a three-tier rate structure as directed by the

1 Commission.

2 Decoupling is a valuable tool that enables the
3 utilities to achieve conservation goals without
4 compromising financial stability. It is used widely in
5 other industries regulated by this Commission, and there
6 is no reasonable basis to deny water utilities the use
7 of the same tool particularly on the record before us;
8 and the record bears emphasis here because
9 Cal Advocates' arguments against Suburban's proposed
10 decoupling mechanism, the revenue stabilization
11 mechanism, or RSM, rest largely, if not entirely, on
12 allegations tied to other proceedings.

13 For example, Cal Advocates raises concerns
14 about surcharges citing large, or in Cal Advocates'
15 words, enormous balances accrued by other utilities
16 operating under the WRAM, or Water Revenue Adjustment
17 Mechanism. But Cal Advocates ignores that Suburban
18 proposes a sales reconciliation mechanism to work in
19 tandem with its RSM to mitigate just the in -- just
20 those instances and to adjust sales forecasts in the
21 upcoming year when there's a material change in sales
22 during the prior year.

23 Cal Advocates also makes repeated references to
24 the Commission's Decision 24-12-025, which address a
25 different utility's rate case. Cal Advocates relies on

1 D.24-12-025 for its proposition that a decoupling
2 mechanism writ large inequitably shifts risks onto
3 ratepayers.

4 Cal Advocates does not explain and reckon with
5 why the Commission has authorized electric utilities to
6 utilize decoupling mechanisms for decades
7 notwithstanding this purported flaw. Cal Advocates'
8 testimony ignores this plain fact.

9 As Mr. Ronco testified, however, Cal Advocates
10 acknowledges and agrees that a core purpose of
11 decoupling is to reduce consumption of the utilities
12 sold commodity; i.e., its purpose is to conserve.
13 Decoupling mechanisms were widely adopted by the
14 California electric and gas utilities after the energy
15 crisis and increased state focus to improve energy
16 conservation, and they remain in place today with
17 ongoing focus on supporting energy efficiency and
18 conservation programming.

19 These mechanisms remain in place despite that
20 the energy sector, and particularly the electric sector,
21 is experiencing a fundamental shift in this reality as
22 there's increasing focus on electrification and growing
23 demand for the product sold, but this is not the case
24 for water companies, which continue to face volatile and
25 precarious climate conditioning -- climate conditions

1 reminding us of the finite and fickle supply of this
2 critical resource.

3 Against this backdrop of California's climate
4 -- climate situation, water -- conserving water is
5 paramount, which I will discuss in a moment on
6 conservation planning. But I would like to emphasize
7 that decoupling is a critical tool to achieving
8 California's policy of making conservation a way of
9 life.

10 So looking at Suburban's conservation budget,
11 there really isn't a softened way to go about addressing
12 Cal Advocates' position that Suburban's conservation
13 budget should be eliminated. Cal Advocates has provided
14 a very thin basis on which it reaches the conclusion
15 that Suburban's conservation spending is not necessary.

16 Cal Advocates cites to conservation targets
17 that were established under the Schwarzenegger
18 Administration and observed that Suburban has, quote,
19 "met its required conservation target," while we found
20 out on the stand that Ms. Goldberg is aware of the more
21 recent and more stringent conservation standards
22 established under the Making Conservation a Way of Life
23 Framework. This -- this was not addressed in
24 Cal Advocates written testimony.

25 Next, for support, Cal Advocates cites, without

1 any discussion, an article from the Drought Monitor,
2 which allegedly supports its position that Suburban's
3 conservation program -- programming are not necessary.

4 On the stand, Ms. Goldberg pointed to findings
5 that California's "reservoir storage has improved
6 substantially," and that current conditions are notably
7 improved from the multiyear drought that began in 2021.

8 Ms. Goldberg acknowledged, however, that in the
9 phase of data that came out just a short while later,
10 California's current water conditions are far more
11 bleak. Ms. Goldberg acknowledged that California
12 remains in a precarious position as it relates to water
13 supply.

14 And on Cal Advocates' final alleged basis on
15 which to deny Suburban's conservation programming
16 budget, it points to a down -- a downward trend in the
17 last few years of Suburban's sales Data, which
18 Cal Advocates states should be taken into account
19 alongside the concept of demand hardening.

20 Cal Advocates concludes by noting that if these
21 conservation programs become necessary in the future; in
22 other words, if we were to enter into a drought
23 situation, the State Water Resources Control Board is
24 authorized to implement emergency regulations that would
25 be able to address the need for those programs.

1 This is not the way to go about prudent
2 conservation planning. Relying on emergency measures
3 is -- is not going to reflect a sustainable pathway to
4 continue to implement conservation programming and to
5 keep customers aware. In fact, if folks recall, from
6 the 2022 sustained heat wave that was experienced in
7 California, there was repeated reliance on emergency
8 Flex Alert measures to require customers to reduce their
9 electric consumption to that we would avoid an instance
10 of blackouts on the electrical grid.

11 Impressively, customers were able to rise to
12 the occasion and meet that challenge and blackouts were
13 avoid, but there was significant discussion and
14 retrospective review after that discussing why -- why we
15 cannot rely on such emergency measures to require
16 customers to act in a certain way as customers may
17 experience fatigue and not take the -- the alerts or the
18 measures as seriously as they should.

19 At the end of the day, Cal Advocates' proposed
20 elimination of Suburban's conservation programming is a
21 case and point on being pennywise and pound foolish, and
22 CWA urges the Commission to reject Cal Advocates'
23 position on this issue.

24 Finally, on the issue of plant retirements.
25 Cal Advocates relies on a -- relies on a standard

1 practice from U-4-W and the use of quote, "extraordinary
2 obsolescence" to make an adjustment to Suburban's
3 depreciation reserve to account for what it
4 characterizes as early retirement. In doing so,
5 Cal Advocates ignores the plain language of the manual
6 that defines the concept of extraordinary obsolescence
7 as applying to quote, "major units of property."

8 Cal Advocates states that its understanding of
9 this word "major" actually re -- should actually refer
10 to any unit of property paid for by ratepayers. This
11 flies in the face of any standard -- standard practice
12 of interpretation including the rules of statutory
13 interpretation and essentially renders the word "major"
14 meaningless.

15 Cal Advocates' definition appears nowhere in SP
16 U-4-W and is contrary to the very concept of grouped
17 appreciation whereby assets have a balancing effect on
18 the reserve calculation except in instances of
19 extraordinary circumstances involving major units of
20 property.

21 Cal Advocates solely relies on D.24-12-03A(sic)
22 for its position that the Commission has adopted this
23 practice, but CWA hopes that decision reflects an
24 aberration on this point as it is contrary to
25 longstanding Commission practice and the plain language

1 of Standard Practice put out by the Commission.

2 CWA urges the Commission to avoid issuing a
3 decision that would extend this misapplication of the
4 long-held and clearly written Standard Practice on
5 depreciation.

6 Thank you very much for this opportunity.

7 ALJ NOJAN: Let's be off the record.

8 (Off the record.)

9 ALJ NOJAN: Let's be on the record.

10 Ms. McKenna, earlier you spoke of decoupling
11 being implemented in the electric industry and some of
12 your points touched on, I believe the phrase was
13 something to the extent of there's no reason why the
14 water industry should be denied that opportunity or the
15 same treatment.

16 I would like to hear from you a bit on how you
17 would acknowledge or take into account the high cost in
18 the electric industry to the extent that you've
19 considered that as part of your argument and how that
20 timing of the increase in rates has some degree of
21 correlation to decoupling being implemented?

22 MS. MCKENNA: Your Honor, your question is
23 whether there could be a correlation or an actual cause
24 and effect between decoupling in the electric industry
25 and high rates in the electric industry?

1 Is that your question?

2 ALJ NOJAN: Let's me rephrase it more
3 succinctly.

4 The electric industry in California has among
5 the highest rates in the country, and they are
6 decoupled.

7 MS. MCKENNA: Yeah.

8 ALJ NOJAN: How would you address the fear that
9 decoupling in the water industry would also yield
10 runaway rates?

11 MS. MCKENNA: I understand and appreciate it,
12 your Honor.

13 I -- on the high cost in the electric industry,
14 I think there are a number of complex factors that drive
15 those high costs that are not directly related to the
16 water utilities. High cost of undergrounding, for
17 example, wildfire mitigation costs, as I understand it,
18 have been significant drivers of increased costs in the
19 electric industry; and I believe those fall outside of,
20 you know, the mere presence of decoupling.

21 I would also point to, as far as affordability
22 concerns and how that would work for water utilities, in
23 CWA's testimony of Jeffrey Linam, we attached as an
24 exhibit, a report are from Manuel Teodoro, who analyzed
25 affordability impacts in the context of decoupling and

1 that there's more information in there that the overall
2 result of that analysis showed that the use of
3 decoupling for -- in the water industry actually has a
4 mitigating impact on rates and, particularly, for
5 low-income customers.

6 ALJ NOJAN: Okay. And how would you address
7 the -- that answered my question. Okay. Thank you,
8 Ms. McKenna.

9 We will hear from Ms. Dolqueist next.

10 MS. DOLQUEIST: Thank you, your Honor, just to
11 let you know; briefly, in the beginning of my statement,
12 I will be sharing my screen to show certain pieces of
13 testimony that have already been admitted in this
14 proceeding. I will provide citations as I speak, but I
15 wanted to share my screen so people don't have to flip
16 through or scroll through to find them while I'm
17 speaking.

18 Thank you, your Honor, and thank you for the
19 opportunity to provide this closing argument.

20 I want to start by noting that the record in
21 this proceeding shows that Suburban's current and
22 proposed rates are affordable.

23 Let me start by sharing SWS-CB-001. This shows
24 that Suburban's weighted average residential bills are
25 the second lowest among Class A water utilities.

1 Moving on to SWS-CB-002, page 2, Suburban's
2 rates are also affordable in comparison to other
3 regional water providers. As you can see for
4 Whittier/La Mirada, they are the lowest and for this --
5 for San Jose Hills, they are below average.

6 Suburban's service also falls within the
7 affordability range determined by the Commission itself.
8 The affordability ratio, or AR, metrics quantifies the
9 percent of a household income used to pay for essential
10 utility service. AR20 quantifies this for the 20th
11 percentile income level, and although the Commission has
12 not set a specific affordability figure, it has stated
13 that the demarcation for affordability is an AR20 of
14 10 percent, and AR percentages above that indicate
15 affordability concerns.]

16 The affordability metrics for San Jose Hills in
17 SWS-CB-001, Attachment 1, show that Suburban's rates are
18 above the 10 percent affor -- I'm sorry. Are well below
19 the 10 percent affordability demarcation for both
20 essential and average usage and for cap and noncap
21 customers.

22 The affordability metrics for this Whittier-La
23 Mirada service area in SWS-CB-001, page 32, also shows
24 that Suburban's rates showing the AR20 metric are well
25 below the affordability demarcation.

1 Simply put, there is not an affordability
2 crisis here. And Cal Advocates' attempts to
3 characterize Suburban's proposed rates as unaffordable
4 when the data on the record demonstrates otherwise to
5 mean the actual affordability crisis facing other
6 customers and water providers elsewhere in California.

7 Now, although Suburban's proposed rates are
8 affordable, it still makes every effort to provide safe
9 and reliable water service as efficiently as possible.
10 In addition to penalizing employees who fail to meet
11 water quality safety or training standards, Suburban's
12 performance pay program incentivizes employees to
13 prioritize affordability by penalizing them for failing
14 to keep costs down. Artificially holding down water
15 rates by preventing Suburban from recovering its cost of
16 providing service and denying capital investments will
17 not make a meaningful difference in affordability for
18 individual customers. It will, however, make a
19 meaningful difference to Suburban's ability to operate
20 systems and invest in infrastructure. And this, in
21 turn, will have a meaningful impact on safety and
22 reliability of the customer's water service.

23 Suburban takes its obligation to demonstrate
24 the reasonableness of every dollar seriously. Suburban
25 knows that it must prove, by a preponderance of the

1 evidence, that its proposals are reasonable, and that
2 this requires that evidence in support of Suburban's
3 proposals, when weighed against opposing evidence, has
4 greater convincing force.

5 And although Suburban has the burden of proof,
6 Cal Advocates also must support its claims with record
7 evidence. And in order to determine what expenses and
8 capital projects are necessary to provide safe and
9 reliable service, and how to forecast and recover the
10 revenue necessary to provide that service, Suburban
11 relied on witnesses with extensive experience and
12 appropriate credentials. They provided data and
13 in-depth analysis of the needs of the systems in
14 Suburban's customers. Cal Advocates, however, has a
15 credibility problem, and it is persistent throughout its
16 testimony.

17 Let's start with one of Suburban's most
18 important programs, its Pipeline Replacement Program.
19 Because this is so significant in terms of both cost and
20 impact on service, Suburban turned to HDR, a
21 professional engineering firm with more than 100 years
22 of water experience, to better understand how various
23 investment levels will impact future service. HDR used
24 industry best practices to forecast how many breaks will
25 occur. HDR also conducted an AI pilot to determine

1 whether it would provide more accurate results than
2 existing methods and examined when to use pipeline rehab
3 as opposed to replacement.

4 HDR's report uses a project risk score to
5 identify and prioritize projects but consider the
6 likelihood of failure based on data related to break
7 history, pipeline characteristics, and condition
8 assessments. It also considers the consequence of
9 failure based on customer impact, community and
10 environmental impact, and damage resulting from a break.

11 Based on extensive data and analysis, HDR
12 concluded that replacing one percent of pipeline per
13 year is the prudent investment that will enable Suburban
14 to provide safe and reliable service to customers now
15 and into the future.

16 Obviously, Cal Advocates doesn't have the
17 resources to match this level of analysis. But the Cal
18 Advocates' witness does not even meaningfully engage
19 with this material. Instead of addressing the data
20 provided by Suburban that quantifies the benefits for
21 presenting its own, Cal Advocates provides a few
22 anecdotal examples of water systems that aren't
23 comparable to Suburban. Cal Advocates holds up LADWP as
24 a model for its proposed 0.66 percent replacement level
25 even though LADWP's break level far exceeds regional and

1 national averages.

2 Moreover, Cal Advocates ignores the customer
3 impact. It doesn't address the fact that reduced
4 investment levels will lead to significantly more
5 frequent service interruptions in the future. As I
6 mentioned before, Suburban's proposed rates are
7 affordable, but water service that is not reliable is
8 not affordable.

9 Loss of water service might mean that customers
10 have to buy expensive bottled water. A customer might
11 not be able to stay in their home while the water is out
12 due to medical reasons. A water outage might result in
13 a loss of revenue that significantly effects the bottom
14 line for local businesses, or it might mean lost wages
15 for customers if their workplace is closed.

16 The toll of service interruptions on Suburban's
17 customers is completely missing from Cal Advocates'
18 testimony. Cal Advocates' anecdote-heavy and data-light
19 analysis, and its failure to consider the impact on
20 service to customers, makes its testimony less credible
21 and convincing. And these credibility issues occur
22 throughout Cal Advocates' testimony on capital projects.
23 For example, Cal Advocates either does not understand or
24 deliberately minimizes the fire safety concerns in the
25 disadvantaged Sativa District.

1 Cal Advocates appears not to get that it
2 doesn't matter how much water supply capacity a system
3 has, if the pipes are undersized, as they are in Sativa,
4 there will always be insufficient flow. Cal Advocates
5 bizarrely suggests valve flushing as a solution to fire
6 flow issues and, for some reason, includes in its report
7 a recommendation for maintenance of a backflow
8 prevention valve despite the fact that there are no such
9 valves in the Sativa District.

10 Given the catastrophic fires not far from
11 Suburban service area last year, Cal Advocates' failure
12 to understand basic water hydraulics is downright scary.
13 Indeed, it appears that Cal Advocates may be opposing
14 capital projects just for the sake of a lower revenue
15 requirement, not because of the merits of the project or
16 the quality of the support.

17 In the previous GRC, Suburban proposed a test
18 well and production well at Plant 216. The Commission
19 denied the production well but directed Suburban to move
20 forward with a test well. Suburban did this and
21 included in this proceeding a certified hydro geologist
22 report with more than 100 pages of results from physical
23 tests justifying the production capacity. Cal Advocates
24 claimed that there is an absence of physical test is not
25 only easily disapproved but shows that there might

1 simply be no level of support that Cal Advocates would
2 agree is sufficient.

3 Furthermore, Cal Advocates ignored the evidence
4 showing that this project will result in millions of
5 dollars in savings for customers even if the capacity is
6 less than Suburban estimates. Apparently, Cal Advocates
7 is willing to sacrifice these savings in the future in
8 order to get a lower revenue requirement now.

9 And with these types of recommendations, Cal
10 Advocates' claim that its acting in the interest of
11 customers is hardly credible. Cal Advocates' rejection
12 of the Stage Road well project is similarly glib. It
13 rejects this project because it claims that Suburban
14 only collected a single water quality sample, but this
15 ignores the extensive well profiling Suburban conducted
16 during the test well phase that collected hydraulic
17 conductivity and water quality data at various steps.

18 The result of this extensive test well data,
19 which was ignored by Cal advocates, was confirmed by
20 this single sample that Cal Advocates mentions.
21 Moreover, the sample is not a single test; it's a
22 comprehensive suite of tests of over 200 constituents
23 performed by an accredited laboratory. Even Cal
24 Advocates' use of CPI, the Consumer Price Index, to
25 gauge inflation instead of the Engineering News-Record

1 Index, the industry-recognized tool to capture
2 construction cost increases, reflects the shallowness
3 and lack of expertise of its analysis. This is another
4 project that Suburban has demonstrated will save
5 customers millions of dollars over time but that Cal
6 Advocates shortsightedly rejects in favor of a reduced
7 revenue requirement now.

8 Also lacking credibility is Cal Advocates'
9 off-repeated claim that approving projects that were
10 proposed in previous GRCs but not completed, such as
11 PFAS Plant 201, will somehow result in customers paying
12 for them twice. Projects that were forecasted and
13 approved in the last GRC, and their associated revenue
14 requirements, were included in rates solely on the basis
15 of their forecasted in-service date. That funding
16 covered no more than three years of the service life of
17 these projects, a period when other projects were placed
18 into service in there instead, and does not constitute
19 duplicative recovery. I get why Cal Advocates keeps
20 making this claim. It's an attention grabber, but it is
21 untrue and misleading. And the fact that Cal Advocates
22 keeps repeating it makes their testimony less credible.

23 Cal Advocates also disregards the impact of the
24 delayed decision in the last GRC on the capital project
25 process in this GRC. By the time it was issued,

1 Suburban had already begun to complete certain proj --
2 already begun certain projects that were later rejected.
3 It can't go back in time and change this.

4 Suburban also had to delay starting other
5 projects, such as the Plant 201 PFAS project, until it
6 got the decision. Although Suburban engaged a
7 contractor for that project, as soon as it received the
8 decision, the late start meant that there was simply no
9 way to complete construction during 2025 and 2026 as
10 that decision contemplated. Cal Advocates' testimony
11 refuses to engage in this reality for (indecipherable)
12 Suburban for not completing the Plant 201 project by
13 2026. Now, Cal Advocates suggest delaying recovery for
14 this project until 2030 at the earliest even though
15 Suburban expects to use it to provide service to
16 customers by the end of 2027 because Suburban is
17 applying for grants and engaging in PFAS litigation.

18 Cal Advocates recommends that the Commission
19 effectively penalize Suburban for seeking to reduce cost
20 to customers, which hardly creates an incentive for
21 water utilities to pursue these opportunities. Indeed,
22 Cal Advocates not only disregards the customer impact of
23 service issues but also seems hostile to Suburban's
24 efforts to communicate with its customers.

25 Although Suburban provides information on its

1 website and in bill inserts, it is insufficient and
2 unfair to expect customers to just find the information
3 on water quality, low income assistance, or conservation
4 on their own. Instead, Suburban meets customers where
5 they are. Food distributions attract a large number of
6 customers and provide a valuable opportunity to
7 communicate directly with them about things like
8 conservation and the CAP programs and get direct
9 feedback on service issues. These are not corporate
10 goodwill programs but vital community outreach.

11 Finally, I want to address Cal Advocates'
12 spurious claim that Suburban's accounting procedures are
13 insufficient. Suburban follows Generally Accepted
14 Accounting Principles and the Commission's USOA, and the
15 veracity of its financial data has been confirmed by an
16 audit. In its application and workpapers, Suburban
17 provided the level of support required by the
18 Commission's Rate Case Plan, which was, until recently,
19 the level of support that Cal Advocates agreed was
20 sufficient to prove the reasonableness of Suburban's
21 expenses.

22 As part of discovery in this GRC, Suburban
23 provided additional support, including raw general
24 ledger data on every financial transaction. Based on
25 this, Cal Advocates can track costs from the RO model

1 back through to the general ledger data. Cal Advocates
2 makes much of the fact that Suburban doesn't have a
3 regulatory accounting manual, but it doesn't need one.
4 The USOA serves this function and provides all the
5 necessary instructions. Any separate manual would just
6 echo the USOA.

7 Suburban also reviews transactions prior to the
8 filing of the GRC to check for errors and remove
9 one-time or non-reoccurring expenses. Like any system
10 involving humans, it's not perfect. But the fact that
11 Cal Advocates discovered a handful of errors does not
12 prove that Suburban's accounting system is unreliable.
13 Suburban provided data on hundreds of thousands of line
14 entries, which cover millions of underlying
15 transactions. The errors discovered by Cal Advocates
16 are de minimis, both in terms of dollars and as a
17 percentage of transactions.

18 I'm aware that Cal Advocates -- Cal Advocate
19 witnesses get paid for recommending the lowest possible
20 revenue requirement, but their single-minded focus on
21 this objective makes them lose sight of the impact of
22 their recommendations on safety, reliability, and
23 quality of service to customers. By grasping at
24 anything that might reduce the revenue requirement, no
25 matter how farfetched, Cal Advocates undermines its

1 credibility and makes proposals that are not in the best
2 interest of customers.

3 Suburban has an obligation to provide safe and
4 reliable service to its customers. This is a serious
5 matter. Water is the only utility that is ingested.
6 The Commission should adopt Suburban's proposal because
7 they are supported by the preponderance of the evidence
8 and will result in the best outcome for Suburban's
9 customers. Thank you, your Honor.

10 ALJ NOJAN: Ms. Dolqueist, earlier you
11 mentioned that you showed us some charts -- or data that
12 showed Suburban is either among the lowest or below
13 average in specified service area. I believe it might
14 have been Sativa.

15 Can you tell me the source of those numbers?
16 Is this something Suburban compiled itself or is it
17 available in some other place as well?

18 MS. DOLQUEIST: So the -- I believe for the
19 weighted average residential monthly bill, that's the
20 first one, and that was based comparing it to other
21 Class A water utilities. That's based on the
22 Commission-approved rates as of 2025. So you would need
23 to look at the -- at the tariff and rates for these
24 Commission-regulated utilities.

25 The second one was 3/4 meter size monthly cost

1 for Whittier-La Mirada, where it shows they were the
2 three lowest, and San Jose Hills, where it was below
3 average. This was all based on -- this is included in
4 testimony and was based on looking at the tariffs for
5 these municipal utilities.

6 And then the third was the -- was the metrics
7 that were in the report by Tom Chesnutt.

8 ALJ NOJAN: Okay. And if the Commission were
9 to grant Suburban's request in its entirety, do you know
10 where that would place Suburban's rates relative to the
11 other utilities?

12 MS. DOLQUEIST: I believe that the data that we
13 have at this point shows that was based on the current
14 rates, so I'm not -- I don't know offhand how that would
15 result in the adoption of the proposed rates as compared
16 to other utilities.

17 ALJ NOJAN: Okay.

18 Mr. Hockema, are you prepared for your closing
19 argument?

20 MR. HOCKEMA: Yes, your Honor. I do have a
21 demonstrative exhibit that I previously shared with the
22 parties, PUBADV-004, which is handwritten note cards.

23 ALJ NOJAN: I see that. Okay. I will have
24 this ready to reference.

25 You may begin when you're ready.

1 MR. HOCKEMA: Okay. Your Honor, Suburban
2 requests to raise rates 40 percent over the next three
3 years. This request is unaffordable, unnecessary, and
4 unjustified. It's unaffordable.

5 Suburban's request will have a grave
6 affordability impact on its customers. "Grave" is the
7 word used by Suburban's own witness, Dr. Chesnutt, and
8 it accurately describes the situation. The worst metric
9 in Dr. Chesnutt's Appendix B is that AR20 in the San
10 Jose Hills service territory, at the average usage of
11 12.7 CCFs, which would reach 8.6 percent in 2029. Now,
12 it's on target on a trajectory to reach 10 percent, and
13 10 percent is not just a concern. That's the point at
14 which the Commission calls it unaffordable -- officially
15 unaffordable, but all customers will feel the pinch.
16 The problem does not get better. It only gets worse
17 regardless of service area, income, usage, or year.

18 Affordability never improves under Suburban's
19 plan. Despite this, not one of Suburban's performance
20 pain metrics rewards its executives based on
21 affordability according to Mr. Mustich's testimony.
22 Instead, executives are richly rewarded for improving
23 investment performance for shareholders. This is the
24 context in which the Commission must set just and
25 reasonable rates.

1 Planning budgets, a significant portion of
2 Suburban's requested increase is due to unnecessary
3 plant budgets. Cal advocates does not dispute that
4 water utilities must maintain safe and reliable
5 infrastructure. We were focused on the budgets. For
6 many of these projects, the question is the appropriate
7 level of funding and whether the funding should occur in
8 this rate cycle.

9 During this hearing, we heard testimony on
10 three key projects: Pipeline replacement, Plant 201
11 PFAS upgrades, and Stage Road with Project 216.

12 First, pipeline replacement request illustrates
13 the problem with Suburban's application. Suburban seeks
14 funding consistent with a one percent replacement rate.
15 Cal Advocates recommends a lower replacement rate at two
16 thirds of a percent, which better balances
17 infrastructure needs with affordability.

18 Suburban's break rate, IOI, and age of system
19 all point to a well-performing mid-life system. A one
20 percent rate risks premature replacements, which would
21 raise customer bills without providing commensurate
22 value. This is underscored by the fact that Suburban
23 doesn't quantify the marginal customer benefit of a one
24 percent rate versus a two thirds of the percent rate.
25 While replacing mid-life pipe may have some benefit,

1 it's like paying 7.98 per case of bottled water with
2 delivery when it can be picked up in the store for 3.99.
3 The marginal benefit of the bottled water delivery needs
4 to be quantified and considered just like the marginal
5 benefit of a one percent replacement rate over a two
6 third replacement rate.

7 Plant 201, Plant 201 is another problematic
8 budget. Cal Advocates does not dispute the need for
9 PFAS compliance. The problem is that ratepayers have
10 already paid for it and should not be required to pay
11 twice. Suburban's position on Plant 201 is internally
12 inconsistent. Suburban suggests that ratepayers pay
13 only once. However, Decision 24-12-030 took the unusual
14 step of explicitly earmarking funds and making the
15 increase conditional on the project being used and
16 useful. Suburban chose to shift those funds. Now,
17 Suburban asked the Commission to ignore its own decision
18 and act as if those words didn't have any effect and
19 fully fund the project again in this rate case.

20 The Commission should not allow a ratemaking
21 result that effectively rewards the utility for ignoring
22 this decision, shifting funds, and then returning to
23 ratepayers for more. Customers need, pay for, and
24 deserve clean PFAS safe water. Suburban unfairly asked
25 for more money before building the system to deliver it.

1 The Commission should require Suburban to expend the
2 funds it has already earmarked for the project on the
3 project.

4 On Stage Road and Plant 216, third, Stage Road
5 and Plant 216 projects should not be funded now because
6 the asserted benefits are uncertain and unlikely to
7 materialize in this rate cycle.

8 For Stage Road, Suburban is asking for funds
9 they already spent on the project before it was denied
10 in the last GRC decision. Allowing this project into
11 rate base would be retroactive and the ratemaking
12 treatment should be critically considered. Moreover,
13 just because Suburban has constructed the well does not
14 mean that the Commission has to approve the budget for
15 the remaining infrastructure. That would be a sunk cost
16 fallacy. The success of this project is not certain
17 even though Suburban has started building it.

18 For Plant 216, it will not be used and useful
19 in this rate cycle. Mr. Lopez testified that the
20 production well could be drilled in this cycle but not
21 equipped, not connected for blending, and not treated
22 until the next cycle. Suburban has not shown that Stage
23 Road and Plant 216 will provide benefits that are
24 sufficiently certain, sufficiently defined, and
25 sufficiently tied to this rate cycle to justify charging

1 customers now.

2 In this hearing, Cal Advocates asked
3 Ms. Carlson about 14 specific expenses not just a
4 handful. These expenses were a sample of expenses
5 contained in Ms. Goldberg's testimony, which itself was
6 a sample selected from Suburban's workpapers. There are
7 many more in the record.

8 Cal Advocates has three categories of concern:
9 Errors, excesses, and goodwill enhancement, none of
10 which should be born by ratepayers.

11 Errors, we saw some of these, like the turkey
12 transport and Whittier 5k. Just human error. They
13 shouldn't be in there.

14 Excesses, this is like having a annual
15 breakfast at the country club; fun, but not necessarily
16 necessary for the provision of safe water. And Suburban
17 can go ahead and do that, but shareholders should pay
18 that expense.

19 And then finally, goodwill. So goodwill has
20 been -- had it -- like has to add a few different things
21 in the expenses that we looked at. Some of them are
22 branding, which is a little bit different than goodwill,
23 but it is a similar concept. Community reputation
24 enhancement is another part of this. It's focus, the
25 reputation of the community, drives into the goodwill

1 and enhances it directly.

2 Third, donations or charitable contributions.
3 Suburban is very active in the community. They do give
4 out a lot of things, food and many other products,
5 apparently, including the pet bowls and, you know, the
6 branded wagons to deliver it. But goodwill is an asset.
7 It is an intangible asset, and it adds value to the
8 company. Ratepayers should not have to pay for it, so
9 these expenses are a problem.

10 But the real problem is the ratemaking system.
11 No written procedures, no expense classification manual,
12 no automated review to ensure accurate ratemaking
13 treatment. The system is error prone and unreliable.
14 An expense forecast based on an unreliable system cannot
15 be justified.

16 So we're back to Suburban's request of 40
17 percent. It is unaffordable, unnecessary, and
18 unjustified. For these reasons, the Commission should
19 reject Suburban's application and adopt Cal Advocates'
20 well-rounded proposal of 12 percent. Thank you, your
21 Honor.

22 All right. Your Honor, I'm sorry. You're on
23 mute.

24 ALJ NOJAN: Mr. Hockema, earlier you mentioned
25 avoiding the sunk cost fallacy. I would like to ask

1 you, in regards to that issue and recommendation, is
2 your position -- or is the position, rather, of the
3 Public Advocates Office that the Commission should deny
4 costs that -- or rather deny funds that would allow
5 Suburban to complete those projects? Is that right?

6 MR. HOCKEMA: Your Honor, I -- I don't want to
7 mischaracterize our position. I think our exact
8 position is that Suburban hasn't sufficiently shown that
9 this project is going to be successful, or projected to
10 be successful, so they -- they haven't made the -- the
11 complete showing yet for it. And so because there is
12 also a lot of uncertainty with the project, it's not
13 something that should be just approved since they're
14 already started.

15 ALJ NOJAN: Okay. And how would you account
16 for -- or what would your response be to the difficulty
17 in stopping an in progress project?

18 MR. HOCKEMA: Yeah. And, your Honor, I do want
19 to acknowledge that there is a very practical real --
20 real problem here, that Suburban went forward before the
21 last decision was issued and started building it. And
22 we have to think about the -- the treatment of this.

23 So I -- I don't know what the right solution is
24 exactly, but I do know that the Commission should not
25 feel like their hands are tied and they have to because

1 that would -- that would lead to a result where, I mean,
2 other utilities could start doing the same thing and
3 just build projects that have not been approved or were
4 denied and then -- and then come to the Commission and
5 ask for money to finish the projects. And for the -- or
6 that they did do before approval being merged into rate
7 base. So that's not -- that's not a result that is
8 consistent with the forward-looking ratemaking process.

9 So in acknowledging the real difficulties here,
10 and the fact that this decision was late, the Commission
11 should give -- give this project extra consideration and
12 consider both sides of the argument.

13 ALJ NOJAN: Okay. And does the Public
14 Advocates Office have a position on whether allowing for
15 the continuation of these projects, and the benefits
16 that they may yield to ratepayers, how that may compare
17 to the potential for higher costs by either pausing or
18 denying these projects, given the amount that has
19 already been spent towards these projects.]

20 Let me rephrase that. So does the Public
21 Advocates Office feel that the benefits to ratepayers
22 from stopping or deny -- stopping these projects or
23 denying additional funding is higher than the benefit
24 that would be reaped from allowing the continuation of
25 these projects so that they can yield some benefit given

1 that some funds were already expended toward their
2 completion?

3 MR. HOCKEMA: So, your Honor, my understanding
4 is we don't have a clear marginal benefit analysis for
5 those two things, and I -- at this time, we think that
6 there's not enough information to approve the project.
7 So I think our analysis is limited to what to do in this
8 rate cycle, but there is more information that could,
9 you know, move the needle either way.

10 ALJ NOJAN: Okay. Okay. Thank you,
11 Mr. Hockema.

12 Let's be off the record.

13 (Off the record.)

14 ALJ NOJAN: Let's be on the record.

15 We're -- so what I would like to see from
16 parties is -- if there are exhibits that have already
17 been accepted into the record of this proceeding, I
18 would like to see a corrected version along with an
19 accompanying motion to have it admitted into the
20 evidentiary record I would say no later than Friday of
21 this week. So I believe that's June 5th. And while
22 some of these exhibits were admitted and they may -- the
23 corrections are reflected in the transcript, I'd like to
24 see a cleaner version for reference throughout the
25 remainder of the proceeding. I'll also note that -- I

1 think that settles that issue.

2 All right. So with that being said, I'm going
3 to look at the exhibit list for this proceeding, and
4 I'll be turning to the respective counsel for each party
5 one at a time for consideration of a motion to have
6 various exhibits moved for admission. I suppose the
7 first thing I'll ask -- and I'll start with Suburban.

8 Ms. Dolqueist, do you intend to have -- or I'm
9 seeing several exhibits that maybe were not either
10 referenced yet or marked yet. So I'll let you speak on
11 which of these you'd like to have marked and moved for
12 admission.

13 Ms. Dolqueist.

14 MS. DOLQUEIST: Thank you, your Honor.
15 Suburban does have several exhibits. Some of them are
16 workpapers that are referenced in the testimony of
17 others that we'd like to mark and identify and others
18 are the testimony of witnesses who did not appear at
19 hearing. So I'll go through the list of those now.

20 Starting is SWS-001, Suburban Water System's
21 2026 GRC Workpapers Volume I, SWS-002, Suburban Water
22 System's 2026 General Rate Case - Application Supporting
23 Documents Workpapers Volume II, SWS-004, Workpapers
24 Volume IV Suburban Water System's Water Main Renewal
25 Technical Memorandum 2025, SWS-005, Workpapers Volume

1 V-A Master Plans PUBLIC VERSION, SWS-005C, Workpapers
2 Volume V-A Master Plans CONFIDENTIAL, SWS-006,
3 Workpapers Volume VI Supporting Documents, SWS-007,
4 Suburban Water System's 2026 GRC Supplemental Workpapers
5 PUBLIC VERSION, SWS-007C, Suburban Water System's 2026
6 GRC Supplemental Workpapers CONFIDENTIAL, SWS-008,
7 Results of Operations for Test Years Ending December
8 31st, 2027 and 2028, and Attrition Year 2029.

9 I can move on to the witness-specific ones, or
10 do you want to handle these ones as a batch now?

11 ALJ NOJAN: Let's do these as a batch now, but
12 I want to make sure I heard this correctly. So it is
13 essentially 001 through 008. And SWS-003C was already
14 accepted in the past, and that's why you didn't mention
15 it again, correct?

16 MS. DOLQUEIST: That's correct, your Honor.

17 ALJ NOJAN: Okay. So SWS-001, 002, 004, 005,
18 which is the public version, and 005C, SWS-006, SWS-007,
19 SWS-007C, and SWS-008 are hereby marked as stated, SWS
20 followed by the number read accordingly.

21 (Exhibits SWS-001 - SWS-005 were marked for
22 identification.)

23 (Exhibit SWS-005C was marked for
24 identification.)

25 ///

1 (Exhibits SWS-006 - SWS-007 were marked for
2 identification.)

3 (Exhibit SWS-007C was marked for
4 identification.)

5 (Exhibit SWS-008 was marked for
6 identification.)

7 ALJ NOJAN: And are there any objections to the
8 admission of these exhibits into the record?

9 MR. HOCKEMA: No, your Honor.

10 ALJ NOJAN: Okay. These exhibits are received
11 into the evidentiary record of this proceeding.

12 (Exhibits SWS-001 - SWS-005 were received
13 into evidence.)

14 (Exhibit SWS-005C was received into
15 evidence.)

16 (Exhibits SWS-006 - SWS-007 were received
17 into evidence.)

18 (Exhibit SWS-007C was received into
19 evidence.)

20 (Exhibit SWS-008 was received into evidence.)

21 ALJ NOJAN: Ms. Dolqueist, you can move on to
22 the ones sponsored by specific witnesses now.

23 MS. DOLQUEIST: Actually, before that, your
24 Honor, I'd like to move into evidence the three
25 cross-examination exhibits that were identified earlier

1 today. This is SWS-014, SWS-015 and SWS-016.

2 ALJ NOJAN: Are there any objections to these
3 exhibits being received into the record?

4 MR. HOCKEMA: No, your Honor.

5 ALJ NOJAN: Okay. SWS-014, 015 and 016 are
6 hereby received into the evidentiary record.

7 (Exhibits SWS-014 - SWS-016 were received
8 into evidence.)

9 MS. DOLQUEIST: Thank you. Next I'd like to
10 identify SWS-BD-001, Direct Testimony of Brian Deveraux
11 PUBLIC VERSION, SWS-BD-001C, Direct Testimony of Brian
12 Deveraux CONFIDENTIAL VERSION, SWS-CG, Direct Testimony
13 of Craig Gott, SWS-JF-001, Direct Testimony of Jeff
14 Farney PUBLIC VERSION, SWS-JF-001C, Direct Testimony of
15 Jeff Farney CONFIDENTIAL VERSION, SWS-JF-002, Rebuttal
16 Testimony of Jeff Farney, SWS-JF-001, Direct Testimony
17 of John J. Spanos, SWS-JS-002, Rebuttal Testimony of
18 John J. Spanos, SWS-RH-001, Direct Testimony of Robert
19 M. Hunter PUBLIC VERSION, SWS-RH-001C, Direct Testimony
20 of Robert M. Hunter CONFIDENTIAL VERSION, SWS-RH-002,
21 Rebuttal Testimony of Robert M. Hunter, SWS-SB-001
22 (sic), Direct Testimony of Stephen B. Johnson,
23 Consulting Civil Engineer. And that is the last one,
24 your Honor.

25 ALJ NOJAN: Okay. I'm going to read these back

1 to make sure we're on the same page. So I see here I
2 have -- I'm going to mark SWS-BD-001 as SWS-BD-001.

3 (Exhibit SWS-BD-001 was marked for
4 identification.)

5 ALJ NOJAN: I'm marking SWS-BD-001C as
6 SWS-BD-001C.

7 (Exhibit SWS-BD-001C was marked for
8 identification.)

9 ALJ NOJAN: I have SWS-CG-001 marked as
10 SWS-CG-001.

11 (Exhibit SWS-CG-001 was marked for
12 identification.)

13 ALJ NOJAN: I have SWS-JF-001 marked as
14 SWS-JF-001.

15 (Exhibit SWS-JF-001 was marked for
16 identification.)

17 ALJ NOJAN: I have SWS-JF-001C marked as
18 SWS-JF-001C.

19 (Exhibit SWS-JF-001C was marked for
20 identification.)

21 ALJ NOJAN: I have SWS-JF-002 marked as
22 SWS-JF-002.

23 (Exhibit SWS-JF-002 was marked for
24 identification.)

25 ALJ NOJAN: I have SWS-JS-001 marked as

1 SWS-JS-001.

2 (Exhibit SWS-JS-001 was marked for
3 identification.)

4 ALJ NOJAN: I have SWS-JS-002 marked as
5 SWS-JS-002.

6 (Exhibit SWS-JS-002 was marked for
7 identification.)

8 ALJ NOJAN: I have SWS-RH-001 marked as
9 SWS-RH-001.

10 (Exhibit SWS-RH-001 was marked for
11 identification.)

12 ALJ NOJAN: I have SWS-RH-001C marked as
13 SWS-RH-001C.

14 (Exhibit SWS-RH-001C was marked for
15 identification.)

16 ALJ NOJAN: I have SWS-RH-002 marked as
17 SWS-RH-002.

18 (Exhibit SWS-RH-002 was marked for
19 identification.)

20 ALJ NOJAN: I have SWS-SJ-001 marked as
21 SWS-SJ-001.

22 (Exhibit SWS-SJ-001 was marked for
23 identification.)

24 ALJ NOJAN: Ms. Dolqueist, does that reflect
25 your list correctly?

1 MS. DOLQUEIST: Yes, it does, your Honor.

2 ALJ NOJAN: Are there any objections to
3 admitting these records into the -- I'm sorry. Are
4 there any objections to admitting these exhibits into
5 the record?

6 MR. HOCKEMA: No, your Honor.

7 ALJ NOJAN: These exhibits are received into
8 the evidentiary record of this proceeding.

9 (Exhibit SWS-BD-001 was received into
10 evidence.)

11 (Exhibit SWS-BD-001C was received into
12 evidence.)

13 (Exhibit SWS-CG-001 was received into
14 evidence.)

15 (Exhibit SWS-JF-001 was received into
16 evidence.)

17 (Exhibit SWS-JF-001C was received into
18 evidence.)

19 (Exhibit SWS-JF-002 was received into
20 evidence.)

21 (Exhibit SWS-JS-001 was received into
22 evidence.)

23 (Exhibit SWS-JS-002 was received into
24 evidence.)

25 ///

1 (Exhibit SWS-RH-001 was received into
2 evidence.)

3 (Exhibit SWS-RH-001C was received into
4 evidence.)

5 (Exhibit SWS-RH-002 was received into
6 evidence.)

7 (Exhibit SWS-SJ-001 was received into
8 evidence.)

9 ALJ NOJAN: And I believe that constitutes all
10 of the exhibits for Suburban.

11 So I'll be moving on to Mr. Hockema. If you'd
12 like to move any exhibits for marking or admission,
13 please do so now.

14 MR. HOCKEMA: Yes, your Honor. I have four
15 exhibits. The first I'll start with the note cards that
16 I just presented. I have premarked as PUBADV-004. I
17 request that that exhibit be marked and admitted into
18 the record. The second one is the updated current
19 uniform system of accounts, standard operating practice,
20 and that is -- it was served previously as PUBADV-003A.
21 And then, finally, the two witnesses that we had today.
22 We have Mr. Rubang, which is PUBADV-AR-001A as the
23 corrected version that we sent out on Thursday and then
24 Mr. Andre's (sic) testimony PUBADV-AA-001.

25 ALJ NOJAN: Okay. And, Mr. Hockema, the

1 corrected version that was circulated on Thursday, when
2 the witness took the stand today, it appears that he had
3 some additional corrections, or were those corrections
4 already reflected in the exhibit we're seeing today?

5 MR. HOCKEMA: That -- it was already corrected,
6 your Honor. So those were Rubang -- Mr. Rubang -- and
7 then Mr. Andre did -- he added corrections on the stand.

8 ALJ NOJAN: Okay.

9 MR. HOCKEMA: Mr. Rubang had corrections that
10 were served on Thursday.

11 ALJ NOJAN: Okay. So you're moving for the
12 admission of Mr. Andrade's exhibits even though there
13 are corrections that are not reflected in this version;
14 is that right?

15 MR. HOCKEMA: Yeah. So Mr. Andre had the
16 revisions on the stand, and so that will need to be
17 corrected and -- along with the other witnesses that
18 made on-the-stand corrections.

19 ALJ NOJAN: Okay.

20 MR. HOCKEMA: If it's -- if it's easier, we
21 could -- we could leave that off for the moment, and I
22 can just include the corrected version in the motion.

23 ALJ NOJAN: Here's what I'll do. Since we have
24 accepted the other -- with the corrections reflected in
25 the transcript, for simplicity, so we don't need to keep

1 track of which ones were included or not, we'll accept
2 it, but my guidance from earlier still stands that I
3 would like to see a corrected version.

4 And in that motion accompanying it, a reference
5 can be made that these were already accepted into the
6 record, if that's what we choose to do today, and that
7 these new versions only -- the only modifications are
8 the corrections that were provided on the stand.

9 So I'll mark these exhibits as follows: I have
10 PUBADV-003A marked as PUBADV-003A. This is a
11 cross-exhibit, Uniform Systems of Accounts for Class A
12 Water Utilities (CORRECTED).

13 (Exhibit PUBADV-003A was marked for
14 identification.)

15 ALJ NOJAN: I will mark PUBADV-004 as
16 PUBADV-004, the DEMONSTRATIVE EXHIBIT: HANDWRITTEN
17 CARDS TO ACCOMPANY CLOSING ARGUMENTS.

18 (Exhibit PUBADV-004 was marked for
19 identification.)

20 ALJ NOJAN: I believe -- Mr. Hockema, were
21 there exhibits by the witness Goldberg that you
22 mentioned?

23 MR. HOCKEMA: No, your Honor.

24 ALJ NOJAN: Okay. And the next one I'm seeing
25 on my list here is -- are for the -- the witnesses. So

1 for Mr. Andrade, it looks like that was already marked
2 on an earlier date, and for the witness -- let's see.
3 For Rubang, we marked the exhibit today -- and are there
4 any objections to the inclusion of the exhibits
5 sponsored by the witness Andrade and Rubang as well as
6 the demonstrative exhibits and the cross-exhibit being
7 admitted into the evidentiary record?

8 MS. DOLQUEIST: No objections, your Honor.

9 MS. FLEMMING: No, your Honor.

10 ALJ NOJAN: These exhibits -- or rather, the
11 exhibits, as follows, are received into the evidentiary
12 record of this proceeding: PUBADV-003A, PUBADV-004,
13 PUBADV-AA-001, and PUBADV-AR-001A.

14 (Exhibit PUBADV-003A was received into
15 evidence.)

16 (Exhibit PUBADV-004 was received into
17 evidence.)

18 (Exhibit PUBADV-AA-001 was received into
19 evidence.)

20 (Exhibit PUBADV-AR-001A was received into
21 evidence.)

22 ALJ NOJAN: Mr. Hockema, my records are showing
23 that there are, looks like, two exhibits by -- I'm not
24 sure if these are exhibits.

25 Let's be off the record.

1 (Off the record.)

2 ALJ NOJAN: Let's be on the record.

3 Earlier, in the course of evidentiary hearing,
4 there were various documents or exhibits that were
5 referenced in witness testimony that parties noted were
6 too large to be uploaded to the Commission's supporting
7 document system. I will be providing separate guidance
8 later this week on how those specific exhibits and the
9 documents that constitute those exhibits are to be
10 handled.

11 I understand they've been served to parties,
12 but I will be looking into whether there's a way to have
13 them submitted into the Commission's supporting document
14 system.

15 So with that being said, I believe that
16 constitutes all of the exhibits for Public Advocates
17 Office.

18 Mr. Hockema, is that your understanding as
19 well?

20 MR. HOCKEMA: Yes, your Honor.

21 ALJ NOJAN: Moving on to hear from Ms. McKenna.
22 My records show that we've already marked and accepted
23 all of CWA's exhibits; is that correct?

24 MS. MCKENNA: That's my understanding as well.
25 Thank you, your Honor.

1 ALJ NOJAN: Thank you.

2 And, Ms. Fleming, if you'd like to move -- for
3 us to mark or admit any exhibits, you may do so now.

4 MS. FLEMMING: I don't have anything to submit,
5 your Honor. I will just note -- and, again, apologies
6 if this is -- we had some trouble uploading my
7 testimony. We weren't listed, and we finally were
8 listed on the CPUC's website over this weekend. And so
9 that is being updated currently to get my testimony in,
10 and -- but it has been shared on the (inaudible).

11 ALJ NOJAN: Okay. And I'm seeing the exhibit
12 has not been marked, and there's no motion to have it
13 moved into the record. So if you would like us to have
14 it moved into the record, I would need a motion to that
15 extent.

16 MS. FLEMMING: I would like my testimony to be
17 in the record.

18 ALJ NOJAN: Can you please state the exhibit
19 you're referring to.

20 MS. FLEMMING: Oh, boy.

21 ALJ NOJAN: Let's be off the record.

22 (Off the record.)

23 ALJ NOJAN: Let's be on the record.

24 Okay. I will note that I will not be -- any
25 motions for additional exhibits to be received into the

1 evidentiary record should come, at the latest, by
2 Friday, June 6th of this week -- I'm sorry -- June 5th
3 of this week. So that includes any corrections or any
4 pending exhibits. And these are to be filed in
5 accordance with the Commission's Rules of Practice and
6 Procedure.

7 So I believe that that concludes our business
8 for today. I will turn to the parties one at a time for
9 any last comments, questions or concerns.

10 Ms. Dolqueist.

11 MS. DOLQUEIST: None, your Honor. Thank you.

12 ALJ NOJAN: Mr. Hockema.

13 MR. HOCKEMA: None, your Honor. Thank you.

14 ALJ NOJAN: Ms. McKenna.

15 MS. MCKENNA: None from CWA. Thank you, your
16 Honor.

17 ALJ NOJAN: And Ms. Flemming.

18 MS. FLEMMING: None from CalWEP. Thank you.

19 ALJ NOJAN: All right. Thank you.

20 Let's be off the record.

21 (Off the record.)

22 ALJ NOJAN: Let's be on the record.

23 This hearing is adjourned.

24 Let's be off the record.

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(At the hour of 12:01 p.m., the Commission
then adjourned.)

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, ASHLEIGH BUTTON, CERTIFIED SHORTHAND REPORTER
NO. 14013, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON JUNE 1, 2026.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS JUNE 04, 2026.

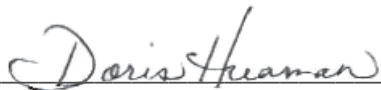

ASHLEIGH BUTTON
CSR NO. 14013

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, DORIS HUAMAN, CERTIFIED SHORTHAND REPORTER
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EXECUTED THIS JUNE 04, 2026.



DORIS HUAMAN
CSR NO. 10538

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, EOANNA KOSTAPAPAS, CERTIFIED SHORTHAND REPORTER
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I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS JUNE 04, 2026.



EOANNA KOSTAPAPAS
CSR NO. 13242

<hr/> \$ <hr/>	100 955:2,11 956:20,23 957:22 959:11 961:14, 16,18 962:3,8 963:12 1013:21 1016:22	2022 1006:6	4,339 969:2
\$10,194,220 950:1,7	100-year 959:1	2023 975:23	40 958:17 1024:2 1029:16
\$10,445,820 949:25 950:6	11 963:23 973:17,18,23 991:7	2024 998:11	407-W-A 993:14,16
\$19,788,780 949:1,8, 15,20	11.1 956:20 958:3,13	2025 1019:9 1022:22 1033:25	45 958:16,18
\$20,277,180 949:7,14, 19	12 972:22 973:17,23 1029:20	2026 949:1,3,15,16 950:1 1019:9,13 1033:21,22 1034:4,5	46 955:7 958:18
\$29,983,000 949:4,11, 17,22	12.7 1024:11	2027 949:2,4,8,10,16, 17,20,21 950:2,7 954:6 1019:16 1034:8	<hr/> 5 <hr/>
\$30,723,000 949:10, 16,21	13 948:24 949:6 958:10, 13 962:2,8 963:8	2028 949:9,11,21,22 950:8 954:6 970:15 1034:8	5 949:13,18 959:8
<hr/> 0 <hr/>	14 980:20 981:4 990:18 1028:3	2029 1024:11 1034:8	5k 1028:12
0.66 954:4,6,20 1014:24	14.1 974:24 975:4 976:17,23,24 977:2,10 978:11,15,17 979:19 980:10,13 981:11,12	2030 1019:14	5th 1032:21 1046:2
001 1034:13	15 961:12,13,15,17 963:15 990:19	20th 1011:10	<hr/> 6 <hr/>
002 1034:17	16 954:23	216 1016:18 1025:11 1027:4,5,18,23	6 1001:7
004 1034:17	17 954:23	24 998:13	6.5 957:17 958:4
005 1034:17	19.4 957:22 958:3	24-12-025 1002:24	6th 1046:2
005C 1034:18	1st 997:21	24-12-030 1026:13	<hr/> 7 <hr/>
008 1034:13	<hr/> 2 <hr/>	240 996:3	7.98 1026:1
015 1036:5	2 957:10,14,16 976:20 991:4 1011:1	25 955:2,11 956:22	70 959:11
016 1036:5	2-11 963:22 967:13	<hr/> 3 <hr/>	<hr/> 8 <hr/>
<hr/> 1 <hr/>	20 949:11	3 955:6 991:1 993:9	8.6 1024:11
1 955:20 972:22 973:17 984:20 993:7,8,9,10 994:3,5 1011:17	20,277,180 948:25	3(sic) 994:3,5	<hr/> 9 <hr/>
1-1 948:23 955:6	20.5 998:14	3.99 1026:2	9 961:5,8 963:23 972:22 973:18 991:7
1-10 949:12	200 959:13 1017:22	3/4 1022:25	9,821,327 993:1
1-4 990:17	200-year 959:17,23 960:1	30,723,000 949:3	90 1001:6
1-5 954:23	201 1018:11 1019:5,12 1025:10 1026:7,11	31st 1034:8	<hr/> A <hr/>
1-6 961:4,8	2017 955:14,22	32 1011:23	A-N-D-R-A-D-E 948:15
1.0 950:4,10	2018 958:20	34 956:11,12 963:11	A-N-D-R-E-W 973:12
1.2 998:13	2021 1005:7	35 956:13,15 957:4	A-N-T-H-O-N-Y 948:15
10 949:24 950:5 961:5,9 972:22 973:18 990:22 991:7 1011:14,18,19 1024:12,13		36 963:4	A.17-01-001. 992:7
		<hr/> 4 <hr/>	A.20-03-001 992:13
		4 959:8	

A.23-00 992:19	accurately 1024:8	adjourned 1046:23	1025:3,15 1026:8
A.23-01-001 992:20	achieve 954:19 1002:3	adjust 1002:20	1028:2,8 1030:3
aberration 1007:24	achieved 997:7	adjusted 991:19	1031:14,21 1044:16
ability 989:6 993:23 1012:19	achieving 1004:7	adjustment 1002:16 1007:2	Advocates' 954:1
absence 998:18 1016:24	acknowledge 1008:17 1030:19	Administration 1004:18	1002:9,14 1003:7
absolutely 945:23 947:14 972:1 978:12 981:20 982:18,23	acknowledged 1005:8,11	administrative 976:21 998:21	1004:12 1005:14
accelerates 998:19	acknowledges 1003:10	admission 1033:6,12 1035:8 1040:12 1041:12	1006:19,22 1007:15
accept 1042:1	acknowledging 1031:9	admit 1045:3	1012:2 1014:18
accepted 968:6 970:19 1020:13 1032:17 1034:14 1041:24 1042:5 1044:22	act 1006:16 1026:18	admitted 1010:13 1032:19,22 1040:17 1043:7	1015:17,18,22 1016:11
ACCOMPANY 1042:17	acting 1017:10	admitting 1039:3,4	1017:10,11,24 1018:8
accompanying 1032:19 1042:4	action 964:16 965:12	adopt 1022:6 1029:19	1019:10 1020:11 1029:19
accordance 1046:5	actions 964:17 991:25 992:4	adopted 1003:13 1007:22	affect 960:25
account 966:11,22 967:1,2 970:1 974:23 975:3,19 976:2 979:11, 13,17,19,24,25 980:2,3, 6,8,15,18,21,22 981:6, 20,23,25 982:17,22,24 983:2,17,25 984:7,11, 13 985:2,7,13,14,21 986:1,7,23 987:11 988:10,22 989:1,22 990:3,10,12,15 992:6 1005:18 1007:3 1008:17 1030:15	active 997:19 1000:22 1029:3	adoption 1023:15	afford 1011:18
accounting 1020:12, 14 1021:3,12	actual 1008:23 1012:5	adopts 950:2,8	affordability 989:5 1009:21,25 1011:7,8, 12,13,15,16,19,22,25 1012:1,5,13,17 1024:6, 18,21 1025:17
accounts 966:19 969:18 972:22 981:18 982:14 985:6 988:15 989:9 990:23 991:8 992:25 993:8,12 994:4, 6,19 1040:19 1042:11	add 959:7 988:5,20 1028:20	advance 981:23	affordable 1010:22 1011:2 1012:8 1015:7,8
accredited 1017:23	added 1041:7	advantage 967:10 985:2 988:12	age 1025:18
accrued 1002:15	addition 960:20 1012:10	adverse 960:15	agencies 996:6,13 1001:10
accurate 1014:1 1029:12	additional 997:11 1020:23 1031:23 1041:3 1045:25	advice 982:6,7,12 986:18 987:1,25 993:13,17,20 994:1,12, 15,18	agree 945:6,9,12,15,18 946:7 960:17 1017:2
	address 953:2 965:14 978:7,22 980:19 985:11 988:8 995:22 998:7 1001:22 1002:24 1005:25 1009:8 1010:6 1015:3 1020:11	Advocate 1021:18	agreed 1020:19
	addressed 1004:23	advocates 948:6 951:6,12 962:17 973:2 982:20 985:5,17 987:22 989:24 990:2,4 993:16 996:15 1001:9 1002:13, 17,23,25 1003:4,9 1004:13,16,24,25 1005:18,20 1006:25 1007:5,8,21 1013:6,14 1014:16,21,23 1015:2, 23 1016:1,4,13,23 1017:1,3,6,19,20 1018:6,19,21,23 1019:13,18,22 1020:19, 25 1021:1,11,15,18,25	agreement 969:15 983:17
	addressing 981:6 1004:11 1014:19		agrees 1003:10
	adds 1029:7		ahead 952:3 964:24 983:3 1028:17
	adequate 986:14,15,21 987:17 988:13		AI 1013:25
	adequately 987:15		aid 967:19 968:3 969:24
	adhere 945:16 947:3 971:15		Alert 1006:8

17,23 1029:24 1030:15 1031:13 1032:10,14 1034:11,17 1035:7,10, 21 1036:2,5,25 1037:5, 9,13,17,21,25 1038:4,8, 12,16,20,24 1039:2,7 1040:9,25 1041:8,11, 19,23 1042:15,20,24 1043:10,22 1044:2,21 1045:1,11,18,21,23 1046:12,14,17,19,22	Andre's 1040:24	approving 1018:9	15,18,22,23 972:2,8
allegations 1002:12	Andrew 971:8,12,15, 18,22 972:2,8,12,23 973:1,12	approximately 992:14	attestations 946:19 971:5
alleged 1005:14	anecdotal 1014:22	appurtenances 961:18,24 962:1,3,10, 12,13,16,19,20 963:7, 11	attorney 952:13 975:15
allegedly 1005:2	anecdote-heavy 1015:18	April 997:21	attract 1020:5
Alliance 998:10	Angeles 954:12	AR 1011:8,14	Attrition 1034:8
allowed 997:9	annual 958:25 959:15 1028:14	AR20 1011:10,13,24 1024:9	audit 1020:16
allowing 985:11 1027:10 1031:14,24	Anthony 946:21,25 947:3,6,10,15,21,25 948:5,14 951:5	area 984:19 989:17 990:21 1011:23 1016:11 1022:13 1024:17	authority 982:2 985:22
alongside 1005:19	apologies 1045:5	argument 996:16,19, 22 1008:19 1010:19 1023:19 1031:12	authorization 999:10
alternative 968:14	apparently 1017:6 1029:5	arguments 995:13 1000:24 1002:9 1042:17	authorize 948:25 949:7,14,19
Alternatively 965:8	appeal 996:18	article 1005:1	authorized 1003:5 1005:24
American 960:7,9 962:22 963:3	appeared 984:6	Artificially 1012:14	automated 1029:12
amortization 990:24	appears 977:14 1007:15 1016:1,13 1041:2	asserted 1027:6	average 955:2,4,11 956:19 957:16 958:1,12 959:12 1010:24 1011:5, 20 1022:13,19 1023:3 1024:10
amortize 993:13,23	Appendix 1024:9	assessment 960:3	averages 957:3 958:9 1015:1
amount 965:4,6,14,19 966:4 1031:18	applicability 976:19	assessments 960:8 1014:8	avoid 1006:9,13 1008:2
amounts 966:14,25 993:24	applicant 1001:15	asset 955:23 1029:6,7	avoiding 1029:25
analysis 998:11 1010:2 1013:13 1014:11,17 1015:19 1018:3 1032:4, 7	application 970:7,12 1020:16 1025:13 1029:19 1033:22	assets 1007:17	awarded 968:18 970:3
analyzed 1009:24	applied 968:25	assistance 999:1 1020:3	awards 965:1,4,9
and/or 945:21	apply 965:8 967:17,18 968:7	Association 962:22 963:4 1001:5	aware 961:17 964:14, 17 966:12 991:23 992:2,8,13,20 1004:20 1006:5 1021:18
Andrade 946:12,17,18, 21,25 947:3,6,10,15,21, 25 948:3,5,14 950:23 951:6 952:11 953:25 963:20 967:9 970:24 983:4,10 1043:1,5	applying 966:18 968:3 1007:7 1019:17	atrophied 997:9	avoiding 1029:25
Andrade's 1041:12	appreciated 1000:25	attached 1009:23	awarded 968:18 970:3
Andrane 948:12	appreciation 1007:17	Attachment 955:6,20 991:1 993:9 1011:17	awards 965:1,4,9
Andre 1041:7,15	appropriately 979:15 985:14	attachments 970:8	aware 961:17 964:14, 17 966:12 991:23 992:2,8,13,20 1004:20 1006:5 1021:18
	approval 1031:6	attempts 947:25 972:12 1012:2	avoiding 1029:25
	approve 1027:14 1032:6	attention 956:1 975:25 1000:25 1018:20	awarded 968:18 970:3
	approved 982:8 984:2 1018:13 1030:13 1031:3	attest 945:6,9,12,15,18, 20,24 946:4,7,25 947:3, 6,10,11,15,21 971:12,	awards 965:1,4,9
	approves 1024:18		aware 961:17 964:14, 17 966:12 991:23 992:2,8,13,20 1004:20 1006:5 1021:18
			backdrop 1004:3
			backflow 1016:7
			baked 997:17
			balance 992:25 998:22
			balances 990:23
			<hr/> B <hr/>
			bachelor's 952:17
			back 957:21 965:17 966:1 967:3 980:8 985:7,8,9,15 986:7 996:17 1019:3 1021:1 1029:16 1036:25

993:13 1002:15 1025:16	blackouts 1006:10,12	building 1026:25 1027:17 1030:21	Calwep's 999:6
balancing 966:11,18, 22 967:1 969:17,25 972:21 990:23 994:19 1007:17	bleak 1005:11	bullet 959:9	Canada 951:24 952:4 956:4
ball 996:10	blending 1027:21	burden 998:9 1013:5	candidate 964:1
band 982:2	Board 1001:11 1005:23	business 953:10 1046:7	cap 1011:20 1020:8
Barely 977:3	body 1000:4	businesses 1015:14	capacity 960:15 996:9 997:4 999:4 1016:2,23 1017:5
base 950:1,7 966:8,9, 14,20 968:2,8 969:24 1027:11 1031:7	books 986:7	buy 1015:10	capital 952:24 1012:16 1013:8 1015:22 1016:14 1018:24
based 946:25 961:23, 25 968:17,18 971:12 1014:6,9,11 1020:24 1022:20,21 1023:3,4,13 1024:20 1029:14	born 1028:10	<hr/> C <hr/>	capture 1018:1
basic 1016:12	bottled 1015:10 1026:1,3	ca 984:9	captured 951:16
Basically 961:9	bottom 1015:13	Cal 954:1 962:17 989:23 990:2,3 993:16 998:11,12 1002:9,13, 14,17,23,25 1003:4,7,9 1004:12,13,16,24,25 1005:14,18,20 1006:19, 22,25 1007:5,8,15,21 1012:2 1013:6,14 1014:16,17,21,23 1015:2,17,18,22,23 1016:1,4,11,13,23 1017:1,3,6,9,11,19,20, 23 1018:5,8,19,21,23 1019:10,13,18,22 1020:11,19,25 1021:1, 11,15,18,25 1025:3,15 1026:8 1028:2,8 1029:19	cards 1023:22 1040:15 1042:17
basin 969:11	bowls 1029:5		Carlson 1028:3
basis 1002:6 1004:14 1005:14 1018:14	boy 1045:20		carry 996:18
batch 1034:10,11	branded 1029:6		case 946:23 965:20,23 968:8 970:5 971:9 979:4,9 980:3 981:17 985:8,10 990:5,7,9 996:24 1002:25 1003:23 1006:21 1020:18 1026:1,19 1033:22
bears 1002:8	branding 1028:22		cases 989:25 1001:4
began 1005:7	break 951:24 952:4 953:7,11 955:2,11 956:16,20 957:7,22 958:8,10 962:2 963:6, 11 1014:6,10,25 1025:18		cata 988:7
begin 1023:25	breakfast 1028:15		catastrophe 988:7 989:12,23 990:3
beginning 1010:11	breaks 953:2 955:2,11, 23 956:4,20,23 957:22 961:13,14,16,18,25 962:2,8,18 963:8,12,15 1013:24		catastrophic 978:23 979:21 981:16 983:22 984:4,5,10 1016:10
begun 970:17 1019:1,2	Brian 1036:10,11	calculate 963:6	categories 1028:8
belie 959:20	briefly 989:21 998:7 1010:11	calculated 957:18	causing 960:15
benchmarking 954:17	bring 956:1 985:9	calculation 1007:18	CCFS 1024:11
benefit 964:19 968:11 1025:23,25 1026:3,5 1031:23,25 1032:4	brings 985:7	California 952:21 957:13 967:24 969:13 985:19 995:24 996:3,20 998:3 999:7 1001:5,7 1003:14 1005:11 1006:7 1009:4 1012:6	central 969:11
benefits 964:12 968:13 982:25 1014:20 1027:6, 23 1031:15,21	broader 1001:19	California's 964:3 996:12 999:5 1004:3,8 1005:5,10	certified 1016:21
bigger 985:9	broadly 986:9	called 948:6 973:2 999:1	challenge 1006:12
bill 1020:1 1022:19	broken 960:21	calls 1024:14	chance 968:23 977:22
bills 998:13,17 1010:24 1025:21	brought 986:4	Calwep 995:15 996:22 1000:8 1046:18	change 1002:21 1019:3
bit 953:25 1008:16 1028:22	budget 998:23 999:11 1004:10,13 1005:16 1026:8 1027:14		characteristics 1014:7
bizarrely 1016:5	budgets 1025:1,3,5		
	build 996:5 997:14 999:4 1031:3		

characterize 1012:3	1004:3,4	1020:7	concept 989:6 1005:19 1007:6,16 1028:23
characterizes 1007:4	close 958:13 979:16 985:13 988:10	communicating 953:5	concern 990:21 1024:13 1028:8
charging 1027:25	closed 975:20 1015:15	communication 945:14 947:23 972:10	concerns 953:10 1002:13 1009:22 1011:15 1015:24 1046:9
charitable 1029:2	closing 985:2,7 995:13 1000:24 1010:19 1023:18 1042:17	communications 947:22 972:9	concluded 1014:12
charts 1022:11	club 1028:15	communities 968:24 998:16	concludes 999:13 1005:20 1046:7
check 1021:8	coached 947:5 971:17	community 969:3,6 1014:9 1020:10 1028:23,25 1029:3	conclusion 1004:14
checklist 997:19	coaching 945:17	companies 969:15 1003:24	condition 960:3 1014:7
Chesnutt 1023:7 1024:7	Code 991:13	company 969:13,14 1029:8	conditional 1026:15
Chesnutt's 1024:9	collected 1017:14,16	comparable 954:9,14 1014:23	conditioning 1003:25
choice 996:22	combination 1000:5	compare 1031:16	conditions 969:5 979:21 996:16 997:24 1003:25 1005:6,10
choose 1042:6	combine 992:25	compared 950:3,9 959:18 1023:15	conducted 1013:25 1017:15
chose 1026:16	commensurate 1025:21	comparing 1022:20	conductivity 1017:17
circulated 951:23 956:3 1041:1	comments 1046:9	comparison 963:14 1011:2	CONFIDENTIAL 1034:2,6 1036:12,15,20
circumstance 965:18	commercial 953:21	competing 998:22	confirm 974:1
circumstances 1007:19	Commission 946:3,23 947:20 948:25 949:7, 14,19 950:2,8 964:22 969:13 971:10 972:7 981:5 982:1,13 984:8 985:15,22 986:6 987:7, 9 988:3,8 991:14 993:17 998:22 1001:11 1002:1,5 1003:5 1006:22 1007:22,25 1008:1,2 1011:7,11 1016:18 1019:18 1022:6 1023:8 1024:14, 24 1026:17,20 1027:1, 14 1029:18 1030:3,24 1031:4,10	compiled 1022:16	confirmed 1017:19 1020:15
citation 951:17	Commission's 982:8 986:18 1002:24 1020:14,18 1044:6,13 1046:5	complete 1019:1,9 1030:5,11	connected 1027:21
citations 1010:14	Commission- approved 1022:22	completed 1018:10	consequence 1014:8
cite 955:12	Commission- regulated 1022:24	completely 996:19 1015:17	consequences 960:21 961:1
cited 955:15 956:23 1000:9	commit 964:7	completing 1019:12	conserva 997:13
cites 1004:16,25	commodity 1003:12	completion 1032:2	conservation 974:23 975:3,18 976:2,16,23 980:5,7,9,15,18 996:7, 20,25 997:15,16,25 998:2,8,14,17,18 999:11,16,22,24 1001:22 1002:3 1003:16,18 1004:6,8, 10,12,15,16,19,21,22 1005:3,15,21 1006:2,4, 20 1020:3,8
citing 1002:14	communicate 1019:24	complex 1009:14	conserve 1003:12
Civil 960:7,10 1036:23		compliance 996:8 1026:9	conserving 1004:4
claim 959:24 963:25 1017:10 1018:9,20 1020:12		compliance-related 998:24	
claimed 957:21 1016:24		comprehensive 951:25 952:5 956:4 1017:22	
claims 959:25 964:6 1013:6 1017:13		compromising 1002:4	
Class 1010:25 1022:21 1042:11		con 969:24	
classification 1029:11			
clean 1026:24			
cleaner 1032:24			
clear 984:5 1032:4			
climate 1003:25			

consideration 986:24 1031:11 1033:5	Control 1005:23	costly 999:8	customers 953:6 959:23 960:1 964:13,19 966:9 996:17 997:5 998:12 999:3 1001:8,14 1006:5,8,11,16 1010:5 1011:21 1012:6,18 1013:14 1014:14 1015:9,15,17,20 1017:5,11 1018:5,11 1019:16,20,24 1020:2, 4,6 1021:23 1022:2,4,9 1024:6,15 1026:23 1028:1
considered 954:10 970:6 988:14 1008:19 1026:4 1027:12	convincing 1013:4 1015:21	costs 976:14,22 981:15,17 986:23 987:14,16 988:14,16 989:25 990:5,9,10,11, 14 1009:15,17,18 1012:14 1020:25 1030:4 1031:17	cut 996:17
considers 1014:8	copy 948:16 973:14	counsel 1033:4	cuz 988:6
consistent 1025:14 1031:8	copying 945:23 947:13 971:25	country 1009:5 1028:15	CWA 1001:1,9,11,16, 21,23 1006:22 1007:23 1008:2 1046:15
constituents 1017:22	core 1003:10	cover 1021:14	CWA's 1001:18 1009:23 1044:23
constitute 1018:18 1044:9	corporate 1020:9	covered 1018:16	cycle 959:1 1025:8 1027:7,19,20,22,25 1032:8
constitutes 1040:9 1044:16	correct 950:14 952:18, 21,22 953:3,7,11,12 954:9,14,20 955:2,3,12, 13 956:9,20,23 957:4,8, 11,12,17,23 958:2,9 959:2,6,7,24,25 960:6 961:24 962:3,11 963:8, 9,12,13,16,17 964:3,4,8 965:1,2,6,10,11,19 966:5,6,14 967:3,4 975:20,21,23,24 976:5, 6,8,9,17,18,25 978:16, 19,23,24 979:1 980:11 983:18,23 986:16 989:25 990:1,5,7,15,16, 24,25 991:8,9,12,16,20, 21 993:1,5,10,14,18,24 1034:15,16 1044:23	CPI 1017:24	D
constructed 1027:13	corrected 951:13 972:18,20,23 973:22 1032:18 1040:23 1041:1,5,17,22 1042:3, 12	CPUC's 1045:8	D.19-05-029 992:9
construction 967:19 968:4 969:25 970:14,18 1018:2 1019:9	correction 949:12,23	Craig 1036:13	D.21-11-024 992:14
consultant 954:16	corrections 948:19 950:11 951:11 974:5 1032:23 1041:3,7,9,13, 18,24 1042:8 1046:3	creates 1019:20	D.24-12-025 1003:1
Consulting 1036:23	correctly 946:12,16 1034:12 1038:25	credentials 1013:12	D.24-12-030 992:21
Consumer 1017:24	correlation 980:1 1008:21,23	credibility 1013:15 1015:21 1018:8 1022:1	D.24-12-03a(sic) 1007:21
consumption 1003:11 1006:9	Corwin 945:6,9,12,15, 18,20,24 946:4,7	credible 1015:20 1017:11 1018:22	damage 960:23 1014:10
contained 950:13 1028:5	cost 967:20 998:7 1008:17 1009:13,16 1012:15 1013:19 1018:2 1019:19 1022:25 1027:15 1029:25	crew 953:13,16,20	data 955:18 997:21 999:15,21 1005:9,17 1012:4 1013:12 1014:6, 11,19 1017:17,18 1020:15,24 1021:1,13 1022:11 1023:12
contaminants 967:16		crisis 1003:15 1012:2,5	data-light 1015:18
contemplated 1019:10		criteria 968:19,20 969:7 987:11	date 970:7 987:3,6 1018:15 1043:2
context 1009:25 1024:24		critical 1004:2,7	day 991:14 996:4 1006:19
contingency 974:25 975:5 977:11,16 978:1, 18,21 980:25 984:16,17		critically 1027:12	de 1021:16
continuation 1031:15, 24		cross 951:20 974:19 989:17,19	
continue 973:24 1003:24 1006:4		cross-examination 950:25 951:2,23 952:9 974:17,22 975:11 1035:25	
continues 1000:6		cross-exhibit 1042:11 1043:6	
contractor 1019:7		current 1005:6,10 1010:21 1023:13 1040:18	
contrary 1007:16,24		customer 953:10 960:25 997:10 999:1 1014:9 1015:2,10 1019:22 1025:21,23	
contrast 959:12		customer's 1012:22	
contribution 967:19			
contributions 968:3 969:24 1029:2			

decades 1003:6	demarcation 1011:13, 19,25	diligence 1000:22	document 952:14 955:22 956:2,12 973:14 974:2,6,9,12 975:16 976:3 977:6 1044:7,13
December 1034:7	demonstrate 1012:23	direct 948:4,10 973:6,8 1020:8 1036:10,11,12, 13,14,16,18,19,22	documents 945:1 946:8 950:13,17,20 1033:23 1034:3 1044:4, 9
decide 981:5 985:15,23	demonstrated 999:18 1018:4	directed 1001:25 1016:19	dollar 1012:24
decision 984:9 991:14 992:8,13,20 1002:24 1007:23 1008:3 1018:24 1019:6,8,10 1026:13,17,22 1027:10 1030:21 1031:10	demonstrates 1012:4	directives 985:25	dollars 1017:5 1018:5 1021:16
decisions 1001:3	demonstrative 1023:21 1042:16 1043:6	directly 965:9 998:8 1009:15 1020:7 1029:1	Dolqueist 945:3 951:19,21 952:8,10,13 963:5 967:5 974:18,20 975:10,12,15 983:7,10, 14,15 984:22 989:16, 19,20 995:17 1010:9,10 1022:10,18 1023:12 1033:8,13,14 1034:16 1035:21,23 1036:9 1038:24 1039:1 1043:8 1046:10,11
decorum 945:16	denial 946:1 947:18 972:5	director 995:24	donations 1029:2
decoupled 1009:6	denied 969:18 1008:14 1016:19 1027:9 1031:4	disadvantaged 968:24 969:5 1015:25	doubt 957:1 993:4
decoupling 1001:22, 24 1002:2,10 1003:1,6, 11,13 1004:7 1008:10, 21,24 1009:9,20,25 1010:3	deny 1002:6 1005:15 1030:3,4 1031:22	disapproved 1016:25	downright 1016:12
deemed 946:3 947:19 972:6 985:14	deny 1002:6 1005:15 1030:3,4 1031:22	disaster 987:10 989:3	downward 991:20 1005:16
deferred 998:18	denying 1012:16 1031:18,23	discovered 1021:11, 15	drade 948:12
define 983:19	Department 954:12	discovery 1020:22	draw 969:14
defined 962:13,22 986:9 1027:24	depending 987:25	discrepancy 956:25 957:2 958:7	draws 969:10
defines 1007:6	depends 962:12	discuss 960:6,8 967:13,14,23 1004:5	drilled 1027:20
defining 962:19 988:13	depreciation 1007:3 1008:5	discussed 970:4	Drinking 967:15 968:22 969:20 970:15
definition 1007:15	describes 1024:8	discussing 967:25 980:5 1006:14	drive 1000:6 1009:14
degree 952:17 992:22 1008:20	deserve 1026:24	discussion 1005:1 1006:13	drivers 1009:18
delay 991:25 992:3 1019:4	design 996:17 1000:3	dismissed 970:24 995:7	drives 1028:25
delayed 1018:24	designed 998:2	dispute 1025:3 1026:8	dropping 996:10
delaying 1019:13	destination 997:19	disregards 1018:23 1019:22	drought 978:22,25 979:3 981:16 983:21 985:20 986:9,10 996:25 1005:1,7,22
deleted 978:4 979:23	details 991:2	distributed 974:21	droughts 985:18
deletes 980:3	deteriorating 960:12, 13	distribution 960:14 961:25	dry 997:1
deliberately 1015:24	determine 981:21 1013:7,25	distributions 1020:5	due 953:6 978:22 979:8 983:21 991:25 992:4
deliver 1026:25 1029:6	determined 1011:7	district 953:22 964:2 965:15 967:24 969:10, 16,22 1015:25 1016:9	
delivering 996:11	Deveraux 1036:10,12	districts 998:13	
delivery 960:23 1001:13 1026:2,3	difference 966:7 982:23 983:8,24 1012:17,19	division 982:8,20 984:3 986:18,25 987:6, 21,25 988:1	
demand 997:2 998:5, 18 1003:23 1005:19	difficult 987:23 990:1, 6,8,9,11	doc 974:9	
demanding 996:13	difficulties 1031:9		
	difficulty 1030:16		

1015:12 1025:2	electrification 1003:22	entries 1021:14	excesses 1028:9,14
duplicative 1018:19	electronically 955:6	entry 946:1,2 947:18,19 972:5,6	excludes 962:16
DW 967:23	eliminated 1004:13	environment 998:5	Excuse 971:7
DWSRF 967:14	elimination 1006:20	environmental 1014:10	executed 969:15
<hr/> E <hr/>	email 947:22 972:9	equipped 1027:21	executive 995:23
earlier 1008:10 1022:10 1029:24 1035:25 1042:2 1043:2 1044:3	emergencies 982:4, 14,15 985:6	erode 997:10	executives 1024:20,22
earliest 1019:14	emergency 967:16 978:25 979:3,11 982:16 986:4,5,6 1005:24 1006:2,7,15	error 1028:12 1029:13	exhibit 951:3,7,10,22 952:6 972:20,24 973:22 975:6,8 1009:24 1023:21 1033:3 1034:23 1035:3,5,14, 18,20 1037:3,7,11,15, 19,23 1038:2,6,10,14, 18,22 1039:9,11,13,15, 17,19,21,23 1040:1,3,5, 7,17 1041:4 1042:13, 16,18 1043:3,14,16,18, 20 1045:11,18
early 1007:4	emerging 967:16	essential 1011:9,20	exhibits 945:10 946:5 947:7 971:19 972:16 974:21 975:1 1032:16, 22 1033:6,9,15 1034:21 1035:1,8,10,12,16,25 1036:3,7 1039:4,7 1040:10,12,15 1041:12 1042:9,21 1043:4,6,10, 11,23,24 1044:4,8,9,16, 23 1045:3,25 1046:4
earmarked 1027:2	emphasis 1002:8	essentially 1007:13 1034:13	
earmarking 1026:14	emphasize 1004:6	establish 984:13	
earn 966:13,23	employees 1012:10,12	established 982:22 984:16 1004:17,22	
earthquake 979:8	enable 1014:13	estimates 959:11 1017:6	
ease 951:16	enables 1002:2	estimation 987:15	
easier 1041:20	end 951:18 966:3 987:6 995:18 1006:19 1019:16	evaluate 964:18	
easily 1016:25	Ending 1034:7	event 981:16,22 983:22 984:4,6,7,10 988:7	
echo 1021:6	energy 1003:14,15,17, 20	events 978:23	
economic 960:21	engage 947:21 972:8 1014:18 1019:11	evidence 997:24 1013:1,2,3,7 1017:3 1022:7 1035:13,15,17, 19,20,24 1036:8 1039:10,12,14,16,18, 20,22,24 1040:2,4,6,8 1043:15,17,19,21	existing 1014:2
education 999:1	engaged 999:3 1019:6	evidentiary 945:1,7 946:5,8 947:17 972:4 1032:20 1035:11 1036:6 1039:8 1043:7, 11 1044:3 1046:1	expanding 996:6
effect 980:13 1007:17 1008:24 1026:18	engaging 1019:17	exact 999:14 1030:7	expect 1020:2
effective 991:14	engineer 952:21 1036:23	EXAMINATION 948:10 967:7 973:8 984:23	expects 1019:15
effectively 1019:19 1026:21	engineering 952:17 1013:21 1017:25	examined 947:24 972:11 1014:2	expedited 982:11
effects 960:15 1015:13	Engineers 960:7,10	examples 1014:22	expend 1027:1
efficacy 999:16,22,23	enhancement 1028:9, 24	exceeds 1014:25	expend 1032:1
efficiency 987:2,8 995:24 996:5 997:13, 14,16 998:11 1000:2 1003:17	enhances 1029:1		expense 1028:18 1029:11,14
efficiently 1012:9	enormous 1002:15		expenses 1013:7 1020:21 1021:9 1028:3, 4,21 1029:9
effort 1012:8	ensure 1029:12		expensive 1015:10
efforts 1019:24	enter 1005:22		experience 947:25 952:23 953:1,5,9 972:12 1006:17 1013:11,22
electric 1003:5,14,20 1006:9 1008:11,18,24, 25 1009:4,13,19	entire 977:20		experienced 1006:6
electrical 1006:10	entirety 983:12 1023:9		

experiencing 1003:21	farfetched 1021:25	1000:9,12 1043:9	fully 1026:19
expertise 952:16 981:3 1018:3	Farney 1036:14,15,16	1045:4,16,20 1046:17, 18	fun 1028:15
expired 979:12	fatigue 1006:17	Flex 1006:8	function 1021:4
explain 1003:4	favor 1018:6	flies 1007:11	fund 949:2,9 967:15 968:22 969:21 970:16 998:20 1026:19
explanation 958:6	fear 1009:8	flip 1010:15	fundamental 1003:21
explicitly 1026:14	feedback 1020:9	flooding 960:22	funded 1027:5
extend 1008:3	feel 988:3 1024:15 1030:25 1031:21	flow 960:15 966:9 1016:4,6	funding 968:8 969:15 970:13 998:9 1018:15 1025:7,14 1031:23
extensive 1013:11 1014:11 1017:15,18	felt 996:22	flushing 1016:5	funds 965:14,19,21,22 966:4,10,18 1026:14, 16,22 1027:2,8 1030:4 1032:1
extent 950:16 968:17 974:8 1008:13,18 1045:15	fickle 1004:1	focus 1001:18 1003:15, 17,22 1021:20 1028:24	future 946:1,2 947:18, 19 972:5,6 979:13 989:23,25 998:4 999:5 1005:21 1013:23 1014:15 1015:5 1017:7
external 947:1 971:13	figures 951:12,14	focused 1025:5	
extra 1031:11	file 991:15	folks 1006:5	
extraordinary 1007:1, 6,19	filed 987:1 1046:4	follow 995:14	
eyeballing 993:5	filing 1021:8	follow-up 989:21	
	fill-up 997:22	food 1020:5 1029:4	
	final 949:23 1005:14	foolish 1006:21	
	finally 1006:24 1020:11 1028:19 1040:21 1045:7	force 1013:4	
<hr/> F <hr/>	financial 1002:4 1020:15,24	forecast 950:1,2,7,8 981:17,19 982:3 1013:9,24 1029:14	<hr/> G <hr/>
face 998:13 1003:24 1007:11	find 1010:16 1020:2	forecasted 1018:12,15	Gabriel 969:14
facing 1012:5	finding 998:15	forecasts 1002:20	gains 997:13,14
fact 990:22 1003:8 1006:5 1015:3 1016:8 1018:21 1021:2,10 1025:22 1031:10	findings 1005:4	formal 945:16 947:4 971:16	gas 1003:14
factors 954:10 997:11 1009:14	finish 983:3,10 1031:5	forum 1001:12	gauge 1017:25
fail 1012:10	finite 1004:1	forward 964:23 1016:20 1030:20	general 981:17 985:8, 10 990:5,6,9 1020:23 1021:1 1033:22
failing 1012:13	fire 979:8 1015:24 1016:5	forward-looking 1031:8	generally 958:24 960:18 962:20 970:16 1020:13
failure 1014:6,9 1015:19 1016:11	fires 1016:10	found 998:12 1004:19	geologist 1016:21
fall 1009:19	firm 1013:21	Foundation 955:22	give 946:22 971:9 976:4 988:17 1029:3 1031:11
fallacy 1027:16 1029:25	fit 969:7	framed 998:8	glib 1017:12
falls 1011:6	fits 968:19	Framework 1004:23	goal 961:10,12 963:15
familiar 977:2 981:12 994:17,20	fittings 962:14	free 971:13	goals 1002:3
fantastic 986:20	flaw 1003:7	frequent 1015:5	Goldberg 1004:20 1005:4,8,11 1042:21
FAQ's 955:24	Fleming 1045:2	Friday 1032:20 1046:2	Goldberg's 1028:5
	Flemming 995:15,19, 21,23 999:15,19,25	front 948:17 973:15 974:2	good 945:5 951:11

952:11,12 960:4 964:1 975:13,14	handwritten 1023:22 1042:16	1032:3,11 1035:9 1036:4 1039:6 1040:11, 14,25 1041:5,9,15,20 1042:20,23 1043:22 1044:18,20 1046:12,13	<hr/> I <hr/>
goodwill 1020:10 1028:9,19,22,25 1029:6	handy 956:6		i.e. 1003:12
gotcha 993:10	happen 989:3		identification 951:8 952:7 972:25 975:7,9 1034:22,24 1035:2,4,6 1037:4,8,12,16,20,24 1038:3,7,11,15,19,23 1042:14,19
Gott 1036:13	happened 993:20	holding 959:22 1012:14	identified 946:6 947:8 955:21 969:4 971:20 973:15 974:2 1035:25
governor's 979:11	hardening 1005:19	holds 1014:23	identify 990:21 1014:5 1033:17 1036:10
grabber 1018:20	harder 988:23	holiday 953:14	ignore 1026:17
grade 960:4	HDR 954:16 1013:20, 23,25 1014:11	holistic 1000:4	ignores 1002:17 1003:8 1007:5 1015:2 1017:15
grant 964:25 965:6,13, 17,25 966:1 967:3,13, 14,17,18,22 968:2,3,5, 12,13,18,25 969:21,23 970:3,10,13,16,19 982:2 1023:9	HDR's 961:20 1014:4	home 1015:11	ignoring 1026:21
granted 969:21	head 977:3 1000:1	honestly 996:21	II 1033:23
grants 963:21 966:12 968:21 970:17 1019:17	heading 977:16 999:8	Honor 945:5 946:14 948:9 950:24 951:21,22 952:8 967:6 970:22 971:7 973:7,16,25 974:16,20 975:10 983:5 985:4 986:3 987:4,18, 21 988:5,22 989:5 994:24 995:2,8 1000:14,20 1008:22 1009:12 1010:10,18 1022:9 1023:20 1024:1 1029:21,22 1030:6,18 1032:3 1033:14 1034:16 1035:9,24 1036:4,24 1039:1,6 1040:14 1041:6 1042:23 1043:8,9 1044:20,25 1045:5 1046:11,13,16	ii(a) 976:20
grasping 1021:23	hear 987:4 995:16,17 1000:13,19 1008:16 1010:9 1044:21		illustrates 1025:12
grave 1024:5,6	heard 988:19 1025:9 1034:12		immediately 948:2 968:2 970:13 972:15 982:1 984:1
GRC 959:6 982:2,24 988:23 989:2,4,6 992:7, 19 1016:17 1018:13,24, 25 1020:22 1021:8 1027:10 1033:21 1034:4,6	hearing 945:1,7,23 946:5,8 947:13,18 971:25 972:5 995:13 1025:9 1028:2 1033:19 1044:3 1046:23		impact 966:8,9 967:20 1010:4 1012:21 1013:20,23 1014:9,10 1015:3,19 1018:23 1019:22 1021:21 1024:6
GRCS 991:11 1018:10	hearings 946:1,2 947:18,19 972:5,6		impacts 960:21 1009:25
great 981:14 982:13	heat 1006:6	hopes 1007:23	implement 981:10 1001:24 1005:24 1006:4
greater 1013:4	held 945:8,21 947:12 971:24	hostile 1019:23	implementation 976:15,22 980:9,19
grid 1006:10	helping 996:4	household 1011:9	implemented 978:11 1008:11,21
grouped 1007:16	high 968:23 1008:17,25 1009:13,15,16	human 1028:12	implementing 991:16
growing 1003:22	higher 957:25 958:8 963:7 998:14 999:18,23 1031:17,23	humans 1021:10	implications 1001:19
growth 997:11	highest 1009:5	hundreds 1021:13	important 1001:3 1013:18
guidance 1042:2 1044:7	Hills 951:4 1011:5,16 1023:2 1024:10	Hunter 1036:19,20,21	
<hr/> H <hr/>	history 1014:7	hydraulic 1017:16	
handful 1021:11 1028:4	Hockema 945:4,5,6,9, 12,15,18,20,24 946:4,7, 10,14 948:4,9,11 950:24 951:1 970:20,22 973:5,7,9,24,25 974:16 989:14 994:25 995:2,17 1023:18,20 1024:1 1029:24 1030:6,18	hydraulics 1016:12	
handle 1034:10		hydro 1016:21	
handled 1044:10		hydrologic 998:4	
hands 1030:25		hypothetical 997:12	

Impressively 1006:11	Index 1017:24 1018:1	interests 998:22 1001:17	Jorge 955:20
improve 1003:15	individual 1012:18	interim 970:9 991:7,16, 18,22,24 992:3 993:12, 13	Jose 951:4 1011:5,16 1023:2 1024:10
improved 1005:5,7	inducing 999:24	internally 1026:11	judge 998:21
improving 1024:22	industries 1002:5	interpretation 1007:12,13	judgment 950:17,18 974:9,10
in-depth 1013:13	industry 988:1,2 1008:11,14,18,24,25 1009:4,9,13,19 1010:3 1013:24	interruption 960:22	June 1032:21 1046:2
in-service 1018:15	industry-recognized 1018:1	interruptions 978:7,22 1015:5,16	justified 982:17 983:18 1029:15
inactive 975:23	inequitably 1003:2	intervene 996:24	justify 1027:25
inadequate 986:1,12, 13,19 988:4	inflation 1017:25	intervenors 985:11	justifying 1016:23
inaudible 978:5 1000:15 1045:10	influences 947:1 971:14	invest 1012:20	<hr/> K <hr/>
incentive 1019:20	information 950:13 1010:1 1019:25 1020:2 1032:6,8	investment 999:9 1013:23 1014:13 1015:4 1024:23	keeping 982:22 1001:2
incentivizes 1012:12	infrastructure 960:3,9 997:3,9,17 1012:20 1025:5,17 1027:15	investments 998:14 1012:16	key 1025:10
include 960:22 962:3, 10 1041:22	infrastructures 998:20	involving 1007:19 1021:10	kind 998:1 999:4
included 955:19,21 961:21 986:24 1000:7 1016:21 1018:14 1023:3 1042:1	ingested 1022:5	IOI 1025:18	knowledge 947:1 950:12 955:23 969:8 971:13
includes 961:18 1016:6 1046:3	initial 961:21 963:19	issue 963:21 980:4 985:1,9 998:25 1006:23,24 1030:1 1033:1	<hr/> L <hr/>
including 945:16,22 947:4,12,17 962:1,20 963:7,11 971:16,24 972:4 998:11 1001:10 1007:12 1020:23 1029:5	initially 987:19,24	issued 1018:25 1030:21	laboratory 1017:23
inclusion 1043:4	insert 946:19 971:5	issues 1001:18,22 1015:21 1016:6 1019:23 1020:9	lack 1018:3
income 1011:9,11 1020:3 1024:17	inserts 1020:1	issuing 1008:2	lacking 1018:8
inconsistent 999:7 1026:12	instance 1006:9	items 991:6	LADWP 954:13,19 956:23 957:1,21 998:16 1014:23
increase 965:13,19 966:3 985:12 1008:20 1025:2 1026:15	instances 1002:20 1007:18	IV 1033:24	LADWP's 955:3 1014:25
increased 968:9 1003:15 1009:18	instant 945:7	<hr/> J <hr/>	landscape 996:12 997:10 999:2
increases 998:6 1018:2	institutional 996:9 999:4	Jeff 1036:13,15,16	language 977:22 1007:5,25
increasing 1003:22	instructions 1021:5	Jeffrey 1009:23	large 1002:14 1003:2 1020:5 1044:6
incremental 976:14,21	insufficient 1016:4 1020:1,13	job 982:13 986:21	largely 1002:11
incurred 999:17	intangible 1029:7	John 1036:17,18	larger 958:3,13,14
indecipherable 1019:11	integrity 960:14	Johnson 1036:22	lasting 997:6
	intend 1033:8	joints 962:15,16,21	late 992:10,15,21 1019:8 1031:10
	interest 1017:10 1022:2		latest 1046:1

law 998:21	longstanding 1007:25	manage 998:2	19,21
lead 1015:4 1031:1	looked 954:17 1028:21	management 955:23 997:2 998:6,19	meaningfully 1014:18
Leaks 955:23	Lopez 955:20 1027:19	managing 952:24 1000:23	meaningless 1007:14
leave 1041:21	Lori 952:13 975:15	mandatory 974:22 975:2,18 976:2,15,23 980:5,7,9,15	means 979:13 996:5
ledger 1020:24 1021:1	Los 954:12	manual 962:23 963:4 1007:5 1021:3,5 1029:11	meant 1019:8
left 986:7	lose 1021:21	Manuel 1009:24	measured 958:11
legislature 1001:10	loss 1015:9,13	marginal 1025:23 1026:3,4 1032:4	measurements 997:22
let alone 982:25	lost 953:10 1015:14	mark 952:3 975:1,2 1033:17 1037:2 1042:9, 15 1045:3	measures 976:23 1006:2,8,15,18
letter 982:6,7,12 987:1, 25 993:14,17,21 994:1, 12,16,18	lot 989:9 1029:4 1030:12	marked 951:7 952:6,15 956:2 972:24 975:6,8, 17 1033:10,11 1034:19, 21,23 1035:1,3,5 1037:3,7,9,11,13,15,17, 19,21,23,25 1038:2,4,6, 8,10,12,14,16,18,20,22 1040:17 1042:10,13,18 1043:1,3 1044:22 1045:12	mechanical 952:17
letters 986:19	low 1000:2 1020:3	Master 1034:1,2	mechanism 968:16 970:1 1001:24 1002:10, 11,17,18 1003:2
level 961:10 986:17 987:15,19 988:3 1011:11 1014:17,24,25 1017:1 1020:17,19 1025:7	low-income 1010:5	match 1014:17	mechanisms 982:25 1003:6,13,19
levels 1013:23 1015:4	lower 1016:14 1017:8 1025:15	material 1002:21 1014:19	medical 1015:12
liability 964:19 966:4	lowest 997:23 1010:25 1011:4 1021:19 1022:12 1023:2	materialize 1027:7	meet 1006:12 1012:10
liable 964:8	<hr/> M <hr/>	materials 947:7 971:19	meeting 969:5
licensed 952:20	made 973:16 996:15 998:15 1030:10 1041:18 1042:5	math 993:2,3	meets 1020:4
life 959:11 997:16 1004:9,22 1018:16	main 951:24 952:4 953:2,7,11 956:4 962:13,14,15 1033:24	matter 966:25 1001:1 1016:2 1021:25 1022:5	member 1001:12,16
likelihood 987:10 1014:6	mains 960:13,22	Mckenna 995:16 1000:13,14,19,20 1008:10,22 1009:7,11 1010:8 1044:21,24 1046:14,15	memo 990:23 991:8
limited 990:14 1032:7	maintain 996:8 997:6 1025:4	MCMA 975:19 976:8,14 981:8,9	memorandum 966:11, 19 967:2 969:18 970:1 972:22 974:23 975:3,18 976:2 979:10,13,18,24 980:2,3,5,7,15,18,21 981:18,20,23,24 982:14,17,22,24 983:2, 17 984:6,11,13 985:6, 21 986:1,23 988:22 989:8,22 990:3,10,12, 14 994:19 1033:25
Linam 1009:23	maintenance 960:20 1016:7	meaningful 1012:17,	memory 947:1 971:13
lines 954:23 961:5,8 963:23 990:18	major 1007:7,9,13,19		mention 1034:14
list 1033:3,19 1038:25 1042:25	make 945:19 947:10 948:19 950:16 959:24, 25 971:22 974:8 976:4 977:21 982:1 984:9 1007:2 1012:17,18 1034:12 1037:1		mentioned 962:5 1015:6 1022:11 1029:24 1042:22
listed 1045:7,8	makes 969:2 1002:23 1012:8 1015:20 1018:22 1021:2,21 1022:1		mentions 1017:20
listening 1000:22	making 951:17 962:17 997:6,15 1004:8,22 1018:20 1026:14		mere 1009:20
litigation 965:1,4,9,18, 21,25 966:10,13,18,23 967:1 968:7 1019:17			merged 1031:6
load 996:18			merits 1016:15
local 960:22 1015:14			met 1004:19
long 953:6 982:5			
long-held 1008:4			
longer 978:25 997:25			

meter 1022:25	modest 999:9	News-record 1017:25	
methods 1014:2	modifications 1042:7	night 953:18	
metric 1011:24 1024:8	moment 983:9 984:21 1004:5 1041:21	NOJAN 945:3 946:10, 15,18 948:3 951:1,9 952:1 962:25 963:2 967:8 970:20,24 971:3 972:16 973:5,19,21 974:18 975:1 983:3,9 984:21,24 989:14,18 994:25 995:4,6,9,11 999:15,21 1000:7,11, 13,16,18 1008:7,9 1009:2,8 1010:6 1022:10 1023:8,17,23 1029:24 1030:15 1031:13 1032:10,14 1034:11,17 1035:7,10, 21 1036:2,5,25 1037:5, 9,13,17,21,25 1038:4,8, 12,16,20,24 1039:2,7 1040:9,25 1041:8,11, 19,23 1042:15,20,24 1043:10,22 1044:2,21 1045:1,11,18,21,23 1046:12,14,17,19,22	
metrics 960:7 999:16 1011:8,16,22 1023:6 1024:20	money 967:18 1026:25 1031:5	non-reoccurring 1021:9	<hr/> O <hr/>
mid-life 1025:19,25	Monitor 1005:1	noncap 1011:20	oath 947:4,23 971:16 972:10
middle 953:17 958:19 959:10	monthly 1022:19,25	nonprofit 996:2	oaths 945:13
mile 961:13 962:3 963:8,16	months 992:14	notably 1005:6	objections 1035:7 1036:2 1039:2,4 1043:4,8
miles 955:2,11 956:20, 23 957:22 961:14,16,18 962:9,18 963:12	moratorium 976:16	note 951:9,18 1023:22 1032:25 1040:15 1045:5,24	objective 1021:21
million 990:22 1001:7	morning 945:5 952:11, 12 975:13,14	noted 1044:5	obligation 1012:23 1022:3
millions 1017:4 1018:5 1021:14	motion 1032:19 1033:5 1041:22 1042:4 1045:12,14	notes 946:11 960:2 961:23	obligations 996:8
minimis 1021:16	motions 1045:25	noting 1005:20 1010:20	observed 1004:18
minimizes 1015:24	move 961:4 963:20 979:16 988:20 990:17 993:7 1016:19 1032:9 1034:9 1035:21,24 1040:12 1045:2	notwithstanding 1003:7	obsolescence 1007:2, 6
minus 960:5	moved 1033:6,11 1045:13,14	number 951:11 954:10 958:3,4,5,13,15,18 959:14 961:7 962:4,18, 23 1009:14 1020:5 1034:20	occasion 1006:12
Mirada 1011:4,23 1023:1	moving 998:3 1001:24 1011:1 1040:11 1041:11 1044:21	numbers 1022:15	occur 981:22 1013:25 1015:21 1025:7
misapplication 1008:3	multiyear 1005:7	Numeral 976:20	occurred 982:16
mischaracterize 1030:7	municipal 1023:5		occurrence 948:2 972:14
misleading 1018:21	Mustich's 1024:21		occurs 979:22 981:25 988:7 989:23
misreads 996:19	mute 1029:23		off-repeated 1018:9
missed 962:4			offhand 1023:14
missing 1015:17			Office 948:7 951:6,13 973:3 982:20 985:5,17 987:22 996:15 1030:3 1031:14,21 1044:17
mistake 973:16			officer 948:2 972:14
mistaken 994:10	<hr/> N <hr/>		officially 1024:14
misunderstood 987:18	nation 998:16		on-the-stand 1041:18
mitigate 1002:19	national 955:1,4,10 956:19 958:1,3,9 961:10 1015:1		one-time 1021:9
mitigating 1010:4	nature 950:17 974:9		ongoing 997:7,12,19 1003:17
mitigation 1009:17	navigate 996:6		open 983:25 989:23
Mm-hmm 977:8,19	necessarily 985:20 1028:15		opens 990:2
mode 947:23 972:10	needle 1032:9		operate 1012:19
model 1014:24 1020:25	negatively 960:24		operating 976:21 996:13 1001:7 1002:16 1040:19

operational 997:4 Operations 1034:7 operators 1001:19 opinion 982:15 opportunities 1019:21 opportunity 988:17 989:24 990:4 995:22 1000:24 1008:6,14 1010:19 1020:6 opposed 1014:3 opposing 945:2 946:9 947:9 971:21 1013:3 1016:13 order 995:14 1013:7 1017:8 organization 1001:6 outage 1015:12 outcome 1022:8 outcomes 960:24 outreach 999:2 1020:10 overhead 999:2 oversight 1001:1	1023:22 1032:16 1044:5,11 1046:8 partnership 961:10,22 963:15 995:24 party 945:2 946:9 947:9 971:21 996:24 1033:4 past 951:11 1034:14 pasted 994:7 pathway 1006:3 pause 997:2 pausing 1031:17 pay 965:17 966:1 967:3 1011:9 1012:12 1026:10,12,23 1028:17 1029:8 paying 1018:11 1026:1 PDF 955:7 956:12 958:18 959:8 penalize 1019:19 penalizing 1012:10,13 penalties 976:14 penalty 946:22 971:9 pending 946:23 964:15 970:11 971:10 1046:4 pennywise 1006:21 people 969:2 1010:15 percent 950:4,10 954:4,6,20 958:25 959:15 960:1 998:14 1011:9,14,18,19 1014:12,24 1024:2,11, 12,13 1025:14,16,20,24 1026:5 1029:17,20 percentage 1021:17 percentages 1011:14 percentile 1011:11 perfect 1021:10 performance 1012:12 1024:19,23 performed 1017:23 period 970:9 979:4,9 1018:17	perjury 946:22 971:9 permanent 997:17 perpetuity 987:7 persistent 1013:15 pet 1029:5 PFAS 951:4 964:3,12, 25 965:5,9,14 1018:11 1019:5,17 1025:11 1026:9,24 PFAS-RELATED 964:6 phase 1005:9 1017:16 phone 947:22 972:9 phrase 1008:12 physical 960:14 1016:22,24 picked 1026:2 piece 1000:3 pieces 1010:12 pike 985:19 pilot 1013:25 pinch 1024:15 pipe 959:11 1025:25 pipeline 949:2,9 951:4 954:1,3,5 1013:18 1014:2,7,12 1025:10,12 pipes 1016:3 place 946:20 971:6 978:11 988:13,15 1003:16,19 1022:17 1023:10 plain 1003:8 1007:5,25 plan 974:25 975:5 977:11,16 978:1,7,11, 18,21 980:25 984:16,17 1020:18 1024:19 planning 1001:22 1004:6 1006:2 1025:1 plans 954:19 964:15 1034:1,2 plant 951:5 1001:23 1006:24 1016:18 1018:11 1019:5,12	1025:3,10 1026:7,11 1027:4,5,18,23 point 959:9 979:19 981:24 989:3 992:23 1000:10,12 1006:21 1007:24 1009:21 1023:13 1024:13 1025:19 pointed 960:12 1005:4 pointing 997:24 points 1000:10,12 1005:16 1008:12 policy 981:14 1001:9 1004:8 population 969:2 997:11 Portals 955:23 portion 1025:1 position 999:6 1004:12 1005:2,12 1006:23 1007:22 1026:11 1030:2,7,8 1031:14 positions 964:7 possibly 980:22 982:7 potential 1031:17 pound 1006:21 Power 954:13 practical 1030:19 practice 1007:1,11,23, 25 1008:1,4 1040:19 1046:5 practices 1001:12 1013:24 precarious 1003:25 1005:12 predict 979:2,5,7 predictability 989:7 preliminary 974:23 975:3 976:1,7 premarked 946:5 947:7 971:19 1040:16 premature 1025:20 premise 997:15
<hr/> P <hr/>			
pages 1016:22 paid 1007:10 1021:19 1026:10 pain 1024:20 PAO 997:24 998:8 par 977:20 paragraph 958:19,23 960:11 977:15 parameters 986:1,12, 22 paramount 1004:5 part 953:13,16,20 957:14 988:15,19 1008:19 1020:22 1028:24 parties 946:6 947:7,8 971:19,20 995:13			

preparation 976:10	proceed 948:22 995:20	1018:4,24 1019:5,7,12, 14 1025:11 1026:15,19 1027:2,3,9,10,16 1030:9,12,17 1031:11 1032:6	provided 947:7 971:19 1004:13 1013:12 1014:20 1020:17,23 1021:13 1042:8
prepared 1023:18	proceeding 945:7,19, 21 947:11,12 950:21 971:23,24 974:13 991:25 992:4,9,12,14 995:22 1000:23 1001:2, 16,17,21 1010:14,21 1016:21 1032:17,25 1033:3 1035:11 1039:8 1043:12	project's 966:8	providers 1011:3 1012:6
preparing 982:6	proceedings 1002:12	projected 1030:9	providing 994:18 1012:16 1025:21 1044:7
preponderance 1012:25 1022:7	proceeds 965:18,25 966:13,23 967:2	projects 949:2,9 952:24 965:5 967:11 970:17 1013:8 1014:5 1015:22 1016:14 1018:9,12,17 1019:2,5 1025:6,10 1027:5 1030:5 1031:3,5,15,18, 19,22,25	provision 1028:16
presence 1009:20	process 968:16 979:20 982:5,21,24 988:15,23 989:6 994:18 1018:25 1031:8	prone 1029:13	prudent 1006:1 1014:13
present 946:13 979:6 1000:24	product 1003:23	pronouncing 946:12, 15	PUBADV-003A 1040:20 1042:10,13 1043:12,14
presented 945:10 1040:16	production 1016:18, 19,23 1027:20	proof 1013:5	PUBADV-004 1023:22 1040:16 1042:15,16,18 1043:12,16
presenting 1014:21	products 1029:4	property 960:24 1007:7,10,20	PUBADV-AA-001 951:3,7 952:15 1040:24 1043:13,18
preserved 998:23	professional 952:20 1013:21	proposal 950:3,9 1001:23 1022:6 1029:20	PUBADV-AR-001A 972:21,24 973:15 974:2 975:17 1040:22 1043:13,20
presiding 948:2 972:14	profiling 1017:15	proposals 1013:1,3 1022:1	public 948:6 951:6,12 973:2 982:20 985:5,17 987:22 991:13 996:15 1030:3 1031:13,20 1034:1,5,18 1036:11, 14,19 1044:16
pressure 960:16	program 954:1,17 964:3,5,21,24 967:23 969:7 996:25 1005:3 1012:12 1013:18	propose 954:3,5,8	pulling 946:18 971:4
pressures 947:2 971:14 997:12	programming 997:20 1003:18 1005:3,15 1006:4,20	proposed 968:24 999:9 1002:9 1006:19 1010:22 1012:3,7 1014:24 1015:6 1016:17 1018:10 1023:15	purported 1003:7
pretty 996:21	programs 996:5,10 997:17,25 998:2,25 999:7,16,22 1005:21,25 1013:18 1020:8,10	proposes 949:3,10,16, 21 1002:18	purpose 976:13 980:9 981:9 983:1 1003:10,12
preventing 1012:15	progress 1030:17	proposing 959:5 990:13	purposes 951:2
prevention 1016:8	prohibited 945:23 947:14 972:1	proposition 1003:1	pursuant 980:10
previous 984:5 1016:17 1018:10	prohibition 945:17 947:5 971:17	protested 993:16	pursue 969:22 1019:21
previously 945:2 946:9 947:8 956:3 971:20 1023:21 1040:20	prohibitions 945:25 947:16 972:3	prov 994:8	pursued 968:6
price 999:17 1017:24	proj 1019:1	prove 1012:25 1020:20 1021:12	pursuing 964:16
Principles 1020:14	project 965:9,22 966:7 967:20,22 968:1,25 969:6,20 970:14 1014:4 1016:15 1017:4,12,13	provide 970:17 985:25 989:7 991:2 1010:14,19 1012:8 1013:8,10 1014:1,14 1019:15 1020:6 1022:3 1027:23	put 1008:1 1012:1
prior 1002:22 1021:7			
prioritize 1012:13 1014:5			
private 947:22 960:23 972:9			
pro 970:13			
problem 987:13,17 1013:15 1024:16 1025:13 1026:9 1029:9, 10 1030:20			
problematic 1026:7			
Procedure 1046:6			
procedures 1020:12 1029:11			
			<hr/> Q <hr/>
			qualify 964:5

quality 951:5 960:16 1012:11 1016:16 1017:14,17 1020:3 1021:23	950:6 967:21 968:11,14 989:7 998:9,20 999:8 1003:3 1007:10 1026:9, 12,23 1028:10 1029:8 1031:16,21	received 945:13 1019:7 1035:10,12,14, 16,18,20 1036:3,6,7 1039:7,9,11,13,15,17, 19,21,23 1040:1,3,5,7 1043:11,14,16,18,20 1045:25	records 1039:3 1043:22 1044:22
quantified 1026:4	rates 951:24 952:4 956:16 957:7 985:12 989:10 991:7,16,18,22, 24 992:3 999:18,23 1000:2 1008:20,25 1009:5,10 1010:4,22 1011:2,17,24 1012:3,7, 15 1015:6 1018:14 1022:22,23 1023:10,14, 15 1024:2,25	receiving 966:10,17	recover 987:16 994:13 1013:9
quantifies 999:22 1011:8,10 1014:20	ratio 1011:8	recent 1004:21	recovering 1012:15
quantify 1025:23	rationing 976:16 980:10	recently 1020:18	recovery 983:1 988:14 994:13 1018:19 1019:13
question 957:6 983:11 985:4 987:5,12,24 988:2,6 998:8 999:20 1008:22 1009:1 1010:7 1025:6	raw 1020:23	recess 995:12	redirect 970:21,23 989:15 995:1,2
questioning 1000:22	reach 1024:11,12	reckon 1003:4	reduce 968:2 969:24 1003:11 1006:8 1019:19 1021:24
questions 952:14,16 967:5,10 975:16 983:13 984:19,25 994:24 1046:9	reaches 1004:14	recognize 985:18 998:21	reduced 965:5 966:8 1015:3 1018:6
quote 984:9 989:12 1004:18 1007:1,7	read 946:19 961:19 964:9 971:5 973:22 977:4,20,23,24 981:3, 13 996:21 1034:20 1036:25	recommend 970:12 975:20	reducing 967:19,20
<hr/> R <hr/>			
R-U-B-A-N-G 973:13	ready 995:19 1023:24, 25	recommendation 950:3,9 967:10 970:10 975:22 988:10 1016:7 1030:1	reduction 966:20 968:9
raise 998:17 1024:2 1025:21	real 1029:10 1030:19, 20 1031:9	recommendations 954:2 1017:9 1021:22	reductions 978:22
raises 1002:13	reality 1003:21 1019:11	recommended 965:11	refer 947:6 971:18 972:19 1007:9
range 1011:7	realize 957:2	recommending 969:17 977:25 1021:19	reference 951:14,16 955:1,4 957:1 961:9 962:17 1023:24 1032:24 1042:4
rate 950:1,4,7,10 954:3, 20 955:2,11 956:20 957:22 958:8,10,25 959:15 962:2 963:7,11 966:8,9,14,20 968:2,8 969:24 970:5 979:3,9 981:17 982:25 983:1 985:8,10,11 989:25 990:5,6,9 993:13 996:17 1000:3 1001:4, 25 1002:25 1020:18 1025:8,14,15,18,20,24 1026:5,6,19 1027:7,11, 19,25 1031:6 1032:8 1033:22	reason 954:18 975:22 993:4 1008:13 1016:6	recommends 1019:18 1025:15	referenced 956:8 961:20 1033:10,16 1044:5
ratemaking 985:8,9 989:5 1026:20 1027:11 1029:10,12 1031:8	reasonable 989:13 1002:6 1013:1 1024:25	reconciliation 1002:18	references 1002:23
ratepayer 982:25	reasonableness 988:22,23 989:25 1012:24 1020:20	record 948:13 951:16 962:25 963:1,2 971:1,2, 3 973:11,19,20,21 983:11 995:4,5,6,9,10, 11 997:22 1000:16,17, 18 1002:7,8 1008:7,8,9 1010:20 1012:4 1013:6 1028:7 1032:12,13,14, 17,20 1035:8,11 1036:3,6 1039:5,8 1040:18 1042:6 1043:7, 12,25 1044:1,2 1045:13,14,17,21,22,23 1046:1,20,21,22,24	referencing 955:3 956:15
ratepayers 949:25	reasons 1015:12 1029:18	recorded 987:14 997:23	referred 967:12
	rebuttal 955:20 961:19 966:16 1036:15,17,21	recording 945:19,21 947:11,12 971:23,24 987:11	referring 959:20 1045:19
	recall 999:25 1006:5		reflect 983:12 1006:3 1038:24
	receive 967:17 968:2		reflected 1032:23 1041:4,13,24
			reflects 1007:23 1018:2
			refund 991:19
			refuses 1019:11
			region 956:16 957:10, 14,16 958:15

regional 957:3,7 958:1,5,9 1011:3 1014:25	remote 945:13	1025:12 1029:16 1040:17	result 945:25 947:16 964:7 966:3 972:3 1010:2 1015:12 1017:4, 18 1018:11 1022:8 1023:15 1026:21 1031:1,7
regions 957:10 958:14	removal 947:17 972:4	requested 990:24 1025:2	resulting 1014:10
regulated 964:22 969:12 1002:5	remove 978:1 980:15, 21 1021:8	requesting 991:23	results 956:8 996:11 1014:1 1016:22 1034:7
regulations 1005:24	removed 978:5,15	requests 992:3 1024:2	resume 989:19
regulatory 996:12 1001:10 1021:3	renders 1007:13	require 999:5 1006:8, 15 1027:1	retirement 1001:23 1007:4
rehab 1014:2	Renewal 1033:24	required 1004:19 1020:17 1026:10	retirements 1006:24
reject 1006:22 1029:19	reopened 989:2	requirement 968:10 1016:15 1017:8 1018:7 1021:20,24	retroactive 1027:11
rejected 1019:2	reopening 985:2	requirements 947:4 960:20 971:16 996:7 1018:14	retrospective 1006:14
rejection 1017:11	repay 964:25	requires 1013:2	return 966:14,23
rejects 1017:13 1018:6	repeat 957:5 992:1 999:20	research 955:14,22 998:9 1000:1,3,5	returning 995:12 1026:22
related 964:12 981:15 1009:15 1014:6	repeated 1002:23 1006:7	reserve 1007:3,18	revenue 953:10 968:10 1002:10,16 1013:10 1015:13 1016:14 1017:8 1018:7,13 1021:20,24
relates 1005:12	repeating 1018:22	reservoir 997:24 1005:5	review 955:14 976:10 977:15,21,22 982:7,21 984:12,15 986:17,25 987:15,19,20,21 988:3, 16,24 989:24 990:4,8,9, 11,14 1006:14 1029:12
relative 999:17,23 1023:10	rephrase 1009:2 1031:20	residential 1010:24 1022:19	reviewed 988:11
release 964:6 966:4	replacement 949:2,9 950:4,10 951:4 954:1,3, 5,20 958:25 959:1,12, 15 1013:18 1014:3,24 1025:10,12,14,15 1026:5,6	resolution 985:25 986:3	reviews 986:20 988:2 1021:7
releasing 964:11,18	replacements 1025:20	resolutions 984:12,15	revisions 1041:16
reliability 964:12 1012:22 1021:22	replacing 1014:12 1025:25	resource 1004:2	Revolving 967:15 968:22 969:21 970:16
reliable 1001:13 1012:9 1013:9 1014:14 1015:7 1022:4 1025:4	Replenishment 964:2 967:24 969:10,16,22	resources 1001:11 1005:23 1014:17	rewarded 1024:22
reliance 1006:7	report 948:1 951:3 954:22 955:5 956:9 957:19 958:1,4,5,15,17 959:4,16 961:2,5,21 972:13,14,21 976:11 990:18 991:2 1009:24 1014:4 1016:6,22 1023:7	respect 981:15	rewards 1024:20 1026:21
relied 1013:11	represent 950:17 974:10 1001:17	respective 983:12 1033:4	richly 1024:22
relies 1002:25 1006:25 1007:21	representing 958:25 1001:6	respond 983:11 988:18	rise 1006:11
rely 1006:15	reputation 1028:23,25	responding 953:9	risk 1014:4
Relying 1006:2	request 955:19 972:22 973:17,23 985:3 987:2, 9,16 988:11 989:1 1023:9 1024:3,5	response 955:18 996:25 1030:16	risks 1003:2 1025:20
remain 980:13 983:25 1003:16,19		responses 983:13	RO 1020:25
remainder 1032:25		rest 1002:11	Road 1017:12 1025:11
remaining 1027:15		restore 953:14,17,21	
remains 989:22 1005:12		restricted 946:1 947:18 972:5	
remarks 994:6			
Remediation 964:3			
reminding 1004:1			

1027:4,8,23	1016:3,9 1022:14	1024:10,17	side 951:15 956:12
roads 960:23	save 949:25 950:6 972:18 1018:4	Service's 998:13	sides 1031:12
Robert 1036:18,20,21	savings 997:6,10 999:3 1000:6 1017:5,7	servicing 1001:7	sight 1021:21
Roman 976:20	scary 1016:12	set 996:6 1011:12 1024:24	signals 999:17
Ronco 1003:9	scenario 967:25 968:5 987:13	sets 979:20	significant 1006:13 1009:18 1013:19 1025:1
RSM 1002:11,19	schedule 959:12 976:17,24 1001:2	settles 1033:1	significantly 957:25 1015:4,13
Rubang 971:4,7,8,12, 15,18,22 972:2,8,12,17, 23 973:1,10,12 974:1 975:13,25 985:1,24 986:11 987:8 989:21 995:7 1040:22 1041:6,9 1043:3,5	scheduled 970:14	shallowness 1018:2	similar 998:15 1028:23
rule 974:24 975:4 976:16,23 977:2,10 978:3,11,14,17 979:19 980:10,13,19 981:4,11, 12	Schwarzenegger 1004:17	shared 945:2 946:9 947:8 971:20 1023:21 1045:10	similarly 1017:12
rules 945:16 1007:12 1046:5	score 1014:4	shareholders 1024:23 1028:17	simpler 996:14
run 996:2	screen 1010:12,15	sharing 1010:12,23	simplicity 1041:25
runaway 1009:10	screenshots 945:22 947:13 971:25	sheet 976:5 977:13	simply 1012:1 1017:1 1019:8
	scroll 1010:16	shift 1003:21 1026:16	single 1017:14,20,21
	scrolling 955:7,8	shifting 1026:22	single-minded 1021:20
	search 955:16	shifts 1003:2	situation 983:18,20 1004:4 1005:23 1024:8
	section 967:12 976:20	shocked 996:21	size 1022:25
	sector 1003:20	short 1005:9	slipping 999:4
S	seeking 994:12 1019:19	shortage 974:24 975:4 977:11,16 978:1,18,20 980:22 981:5 983:21 984:16,17	small 958:6 968:24 969:3 976:20
sacrifice 1017:7	seeks 1025:13	shortages 979:8	smaller 958:14
safe 961:10,22 963:15 1001:13 1012:8 1013:8 1014:14 1022:3 1025:4 1026:24 1028:16	selected 954:16 1028:6	shortsightedly 1018:6	snowpack 997:21
safety 1012:11,21 1015:24 1021:22	selection 968:19	show 946:11 991:24 992:3 1010:12 1011:17 1044:22	Society 960:7,9
sake 1016:14	sentence 949:13 958:23	showed 1010:2 1022:11,12	softened 1004:11
sales 1002:18,20,21 1005:17	separate 968:16 970:5 1021:5 1044:7	showing 1000:1 1011:24 1017:4 1030:11 1043:22	sold 1003:12,23
sample 1017:14,20,21 1028:4,6	served 1040:20 1041:10 1044:11	shown 957:16 1000:23 1027:22 1030:8	solely 1007:21 1018:14
San 951:4 969:14 1011:5,16 1023:2 1024:9	serves 969:2 1021:4	shows 957:3,5,7 1010:21,23 1011:23 1016:25 1023:1,13	solemnly 946:21 971:8
sanctions 946:1,2 947:17,19 972:4,6	service 953:2,6,14,17, 21 961:10 969:13 998:12,13 1001:13 1011:6,10,23 1012:9, 16,22 1013:9,10,20,23 1014:14 1015:5,7,9,16, 20 1016:11 1018:16,18 1019:15,23 1020:9 1021:23 1022:4,13	shutting 953:2	solution 1016:5 1030:23
satisfaction 960:25		sic 1036:22 1040:24	sought 993:12
Sativa 963:25 965:9,15 969:1,5,10 1015:25			sound 966:19
			sounds 961:15 983:16
			source 955:10,15 1022:15
			Southern 964:2 967:24
			SP 1007:15

Spanos 1036:17,18	starting 948:23 949:5, 12,18,23 950:5 954:6 977:17 1019:4 1033:20	subject 963:21 982:7 986:25 991:18	1029:16,19
speak 1010:14 1033:10	starts 958:20 960:12	submit 951:13 1045:4	success 1027:16
speaking 1010:17	state 946:22 948:12 952:21 957:19 958:4 961:12 967:15 968:22 969:20 970:15 971:8 973:10 978:24,25 979:3,11 984:1 986:4,5, 6 997:18 998:16 1001:8,10,20 1003:15 1005:23 1045:18	submitted 1000:8 1044:13	successful 1030:9,10
Special 972:22 973:17, 23	stated 949:24 966:17 1011:12 1034:19	submitting 982:21	succinctly 1009:3
specific 979:11 1011:12 1028:3 1035:22 1044:8	statement 960:17 974:23 975:3 976:1,7 978:6 1010:11	subset 1001:18	sufficient 1017:2 1020:20
specifically 954:23 961:5 968:23 969:19 980:19 981:7 986:2 990:18 991:3,6 998:25 1001:21	statements 950:16 974:8	substantially 990:11 1005:6	sufficiently 1027:24, 25 1030:8
spell 948:12 973:10	states 960:19 976:18, 19 977:1 1005:18 1007:8	suburban 949:3,10,16, 21 952:13 954:4 959:5 962:8 963:10 964:5,15, 24 965:3,8,17,24 966:13,16,22 967:17 968:1,7,19 969:4,22 975:15 976:5 977:13, 17,25 978:6,21 979:2, 20 981:16,21 982:6,19 983:24 984:1,7 986:8 990:2,13,22 993:12,22 994:13 1001:15 1002:17 1004:18 1012:15,23,24 1013:5, 10,20 1014:13,20,23 1016:11,17,19,20 1017:6,13,15 1018:4 1019:1,4,6,12,15,16,19, 25 1020:4,13,16,22 1021:2,7,13 1022:3,12, 16 1024:1 1025:13,22 1026:12,16,17,24 1027:1,8,13,17,22 1028:16 1029:3 1030:5, 8,20 1033:7,15,20,21, 24 1034:4,5 1040:10	suggest 1019:13
spending 1004:15	statewide 996:2	Suburban's 950:3,9 954:16 955:18,20 958:8,10 961:19,21 962:2,7,24 963:6 964:12 966:16 969:10 991:10 992:19 999:10 1001:17,23 1002:9 1004:10,12,15 1005:2, 15,17 1006:20 1007:2 1010:21,24 1011:1,6, 17,24 1012:3,7,11,19 1013:2,14,17 1015:6,16 1019:23 1020:12,20 1021:12 1022:6,8 1023:9,10 1024:5,7,18, 19 1025:2,13,18 1026:11 1028:6	suggesting 979:22 989:1
spent 1027:9 1031:19	stating 978:3,10		suggests 1016:5 1026:12
spoke 1008:10	stations 997:22		suite 1017:22
sponsor 950:20 974:12	statutory 1007:12		sum 983:16
sponsored 951:5 972:17,23 1035:22 1043:5	stay 1015:11		sunk 1027:15 1029:25
spurious 1020:12	step 1026:14		Supplemental 1034:4, 6
stability 1002:4	Stephen 1036:22		supplier 997:18
stabilization 1002:10	steps 1017:17		suppliers 996:3,23
stabilize 997:5	stopping 1030:17 1031:22		supply 977:18 978:7 998:19 1004:1 1005:13 1016:2
stable 998:4	storage 1005:5		support 997:5,8 1001:13 1004:25 1013:2,6 1016:16 1017:1 1020:17,19,23
staff 988:2,3 996:4	store 1026:2		supported 1022:7
Stage 1017:12 1025:11 1027:4,8,22	straight 980:24		supporting 996:6,23 1003:17 1033:22 1034:3 1044:6,13
stand 970:25 995:7 1004:20 1005:4 1041:2, 7,16 1042:8	straightforward 996:16		supports 1001:23 1005:2
standard 959:23 1006:25 1007:11 1008:1,4 1040:19	stringent 1004:21		suppose 987:12 1033:6
standards 1004:21 1012:11	structure 1001:25		supposed 979:21 981:25 999:14
stands 1042:2	studies 1000:10		surcharges 991:21 1002:14
start 995:25 1000:15,21 1010:20,23 1013:17 1019:8 1031:2 1033:7 1040:15	study 951:25 952:5 956:5,8		suspend 993:17
started 1027:17 1030:14,21			suspended 993:22 994:12
			suspending 999:6

suspension 994:1,22,23	SWS-CG-001 1037:9,10,11 1039:13	talking 979:19 980:1,17 986:2	theses 990:14
suspensions 994:16	SWS-JF-001 1036:13,16 1037:13,14,15 1039:15	tallied 957:19	thin 1004:14
sustain 996:5	SWS-JF-001C 1036:14 1037:17,18,19 1039:17	tamper 948:1 972:13	thing 988:21 1031:2 1033:7
sustainable 1006:3	SWS-JF-002 1036:15 1037:21,22,23 1039:19	tandem 1002:19	things 1020:7 1028:20 1029:4 1032:5
sustained 998:5 1006:6	SWS-JS-001 1037:25 1038:1,2 1039:21	target 958:24 1004:19 1024:12	thinking 951:10
sworn 948:7 973:3	SWS-JS-002 1036:17 1038:4,5,6 1039:23	targets 1004:16	thirds 1025:16,24
SWS 1034:19	SWS-RH-001 1036:18 1038:8,9,10 1040:1	tariff 976:5 977:13 978:3 980:4,17 991:15 1022:23	thought 987:20
SWS-001 1033:20 1034:17,21 1035:12	SWS-RH-001C 1036:19 1038:12,13,14 1040:3	tariffs 1023:4	thoughts 988:19
SWS-002 1033:21	SWS-RH-002 1036:20 1038:16,17,18 1040:5	technical 999:1 1033:25	thousands 1021:13
SWS-003C 1034:13	SWS-SB-001 1036:21	teleconference 945:22	threats 960:13
SWS-004 1033:23	SWS-SJ-001 1038:20,21,22 1040:7	Teodoro 1009:24	three-tier 1001:25
SWS-005 1033:25 1034:21 1035:12	system 960:16 962:1 964:1 969:1,10 988:12 1016:2 1021:9,12 1025:18,19 1026:25 1029:10,13,14 1040:19 1044:7,14	terms 981:3 982:24 987:2 988:13 999:23 1013:19 1021:16	Thursday 1040:23 1041:1,10
SWS-005C 1034:1,23 1035:14	System's 977:17 1033:20,22,24 1034:4,5	territory 1024:10	Tia 995:23
SWS-006 1034:2,18 1035:1,16	systems 960:14 1012:20 1013:13 1014:22 1042:11	test 949:1,8,15,20 991:15 1016:17,20,24 1017:16,18,21 1034:7	tie 989:3
SWS-007 1034:3,18 1035:1,16		testified 948:7 963:10 973:3 1003:9 1027:19	tied 1002:12 1027:25 1030:25
SWS-007C 1034:5,19 1035:3,18		testify 946:25 971:12	tier 987:25
SWS-008 1034:6,19 1035:5,20		testifying 947:4 971:16	time 970:6 979:16 996:23 997:5 998:17 999:12 1018:5,25 1019:3 1032:5 1033:5 1046:8
SWS-014 974:22 975:2,6 976:1 980:8 1036:1,5,7		testimony 945:10 946:22 948:1,17,20,23 950:21 955:12 961:21 962:24 963:19,22 968:1 971:9 972:13 974:12 981:7 994:18 999:13 1000:8 1003:8 1004:24 1009:23 1010:13 1013:16 1015:18,20,22 1018:22 1019:10 1023:4 1024:21 1025:9 1028:5 1033:16,18 1036:10,11,12,13,14,16,17,18,19,21,22 1040:24 1044:5 1045:7,9,16	timely 970:2
SWS-015 974:24 975:4,8 977:5 1036:1		testify 946:25 971:12	timeline 970:2
SWS-016 951:24 952:3,6 1036:1,7		testimony 945:10 946:22 948:1,17,20,23 950:21 955:12 961:21 962:24 963:19,22 968:1 971:9 972:13 974:12 981:7 994:18 999:13 1000:8 1003:8 1004:24 1009:23 1010:13 1013:16 1015:18,20,22 1018:22 1019:10 1023:4 1024:21 1025:9 1028:5 1033:16,18 1036:10,11,12,13,14,16,17,18,19,21,22 1040:24 1044:5 1045:7,9,16	timing 982:9 1008:20
SWS-16 956:2		testify 946:25 971:12	title 973:22
SWS-BD-001 1036:10 1037:2,3 1039:9		testifying 947:4 971:16	today 996:1,13 1003:16 1036:1 1040:21 1041:2,4 1042:6 1043:3 1046:8
SWS-BD-001C 1036:11 1037:5,6,7 1039:11		testimony 945:10 946:22 948:1,17,20,23 950:21 955:12 961:21 962:24 963:19,22 968:1 971:9 972:13 974:12 981:7 994:18 999:13 1000:8 1003:8 1004:24 1009:23 1010:13 1013:16 1015:18,20,22 1018:22 1019:10 1023:4 1024:21 1025:9 1028:5 1033:16,18 1036:10,11,12,13,14,16,17,18,19,21,22 1040:24 1044:5 1045:7,9,16	toll 1015:16
SWS-CB-001 1010:23 1011:17,23		testimony 945:10 946:22 948:1,17,20,23 950:21 955:12 961:21 962:24 963:19,22 968:1 971:9 972:13 974:12 981:7 994:18 999:13 1000:8 1003:8 1004:24 1009:23 1010:13 1013:16 1015:18,20,22 1018:22 1019:10 1023:4 1024:21 1025:9 1028:5 1033:16,18 1036:10,11,12,13,14,16,17,18,19,21,22 1040:24 1044:5 1045:7,9,16	Tom 1023:7
SWS-CB-002 1011:1		testimony 945:10 946:22 948:1,17,20,23 950:21 955:12 961:21 962:24 963:19,22 968:1 971:9 972:13 974:12 981:7 994:18 999:13 1000:8 1003:8 1004:24 1009:23 1010:13 1013:16 1015:18,20,22 1018:22 1019:10 1023:4 1024:21 1025:9 1028:5 1033:16,18 1036:10,11,12,13,14,16,17,18,19,21,22 1040:24 1044:5 1045:7,9,16	tool 1002:2,7 1004:7 1018:1
SWS-CG 1036:12		testimony 945:10 946:22 948:1,17,20,23 950:21 955:12 961:21 962:24 963:19,22 968:1 971:9 972:13 974:12 981:7 994:18 999:13 1000:8 1003:8 1004:24 1009:23 1010:13 1013:16 1015:18,20,22 1018:22 1019:10 1023:4 1024:21 1025:9 1028:5 1033:16,18 1036:10,11,12,13,14,16,17,18,19,21,22 1040:24 1044:5 1045:7,9,16	top 977:3 999:25
	T	tests 1016:23 1017:22	totally 998:24 999:19
	tab 994:2	text 947:22 972:9	touched 1008:12
	table 957:4 991:4,7 993:8,9 994:3,5		track 976:14 1020:25 1042:1
	takes 965:24 1012:23		
	taking 964:7		
	talk 953:25 975:18		
	talked 987:20		

trade 1001:5	uncertainty 1030:12	upgrades 1025:11	20 1032:18,24 1034:1, 5,18 1036:11,12,14,15, 19,20 1040:23 1041:1, 13,22 1042:3
training 1012:11	undergrounding 1009:16	uploaded 1044:6	
trajectory 1024:12	underlying 1021:14	uploading 1045:6	
transaction 1020:24	undermines 1021:25	upward 991:19	versions 1042:7
transactions 1021:7, 15,17	underscored 1025:22	urban 996:3 997:18	versus 1025:24
transcript 951:15 1032:23 1041:25	undersized 1016:3	urge 999:10	VI 1034:3
transparency 985:11	understand 945:20,24 947:11,15 971:23 972:2 980:25 987:17 988:12 994:15 996:18 998:23 999:20 1009:11,17 1013:22 1015:23 1016:12 1044:11	urged 993:17	violation 945:25 947:16 972:3
transport 1028:12	understanding 957:13,15 962:21 963:17 968:17 970:2 979:15 980:14,20,21 982:3,12,13 985:5,10 987:13 988:25 994:11 1007:8 1032:3 1044:18, 24	urges 1006:22 1008:2	visual 945:22 947:13 971:25
treated 1027:21	understood 964:10	USA 952:4 956:4	vital 1020:10
treatment 951:4 969:1 984:11 985:21 1008:15 1027:12 1029:13 1030:22	unfair 1020:2	usage 1011:20 1024:10,17	volatile 998:4 1003:24
trend 1005:16	unfairly 1026:24	USOA 1020:14 1021:4, 6	volatility 985:12 989:10
trouble 1045:6	uniform 1040:19 1042:11	USU 958:1	Volume 1033:21,23,24, 25 1034:2,3
true 950:13	unit 1007:10	Utah 957:19 958:4	
trust 993:3	units 1007:7,19	utilities 954:9,14,15 958:24 959:18 964:21 969:12 991:13 996:4 998:15 999:3 1001:6,12 1002:3,6,15 1003:5,11, 14 1009:16,22 1010:25 1019:21 1022:21,24 1023:5,11,16 1025:4 1031:2 1042:12	<hr/> W <hr/>
truth 946:24 971:10,11	University 957:20	utility 952:24 953:13, 16,20 991:15,24 992:2 997:4 1001:3 1011:10 1022:5 1026:21	W-5000 986:3
turkey 1028:11	unjustified 1024:4 1029:18	utility's 960:25 1002:25	wages 1015:14
turn 954:22 955:5 956:11 958:16 963:22 975:25 977:5 984:20 991:1 997:1 1012:21 1046:8	unnecessary 1024:3 1025:2 1029:17	utilize 1003:6	wagons 1029:6
turned 1013:20	unnoticed 1000:25	<hr/> V <hr/>	wait 955:17 970:18
turning 1033:4	unquote 984:10 989:12	V-A 1034:1,2	wanted 951:18 977:21 1000:21 1010:15
turnover 997:10	unreliable 1021:12 1029:13,14	Valley 969:14	water 951:5,24 952:4, 24 953:2,14,17 954:12 955:14,21 956:3 960:3, 13,16,21,23 961:10,13, 15,17,22 962:22 963:3, 15 964:1 967:15,23 968:22 969:1,9,12,13, 14,16,20,22 970:15 974:24 975:4 976:16 977:11,16,17 978:1,7, 17,20 979:8 980:10 982:8,19 983:21 984:3, 16,17 986:18,25 987:6, 21,24 988:1 991:15,24 992:2 995:24 996:3,5, 12,23 997:5,18 998:10, 12 999:5 1000:2 1001:3,5,6,9,11,13,19 1002:6,16 1003:24 1004:4 1005:10,12,23 1008:14 1009:9,16,22 1010:3,25 1011:3
type 982:3 983:18,19 986:23 988:14	unusual 1026:13	valuable 1002:2 1020:6	
types 1017:9	upcoming 1002:21	valve 1016:5,8	
<hr/> U <hr/>	updated 1040:18 1045:9	valves 962:14 1016:9	
U-4-W 1007:1,16		variability 998:1	
U.S. 960:3		veracity 1020:15	
ultimately 998:20 999:8		version 951:13 972:18,	
unaffordable 1012:3 1024:3,4,14,15 1029:17			
uncertain 1027:6			

1012:6,9,11,14,22	working 953:14,17,21
1013:22 1014:22	959:18
1015:7,9,10,11,12	workpapers 994:7
1016:2,12 1017:14,17	1020:16 1028:6
1019:21 1020:3 1022:5,	1033:16,21,23,25
21 1025:4 1026:1,3,24	1034:1,3,4,6
1028:16 1033:20,21,24	workplace 1015:15
1034:4,5 1042:12	works 962:22 963:3
Water's 963:15	994:1,14 996:2
wave 1006:6	worse 1024:16
Webex 945:8,11,13,21	worst 1024:8
947:12 971:24	WRAM 1002:16
website 1020:1 1045:8	WRD 964:2,6,8,11,16,
week 1032:21 1044:8	18,25 965:13 966:5
1046:2,3	967:23
weekend 1045:8	writ 1003:2
weighed 1013:3	written 959:8 1004:24
weighted 1010:24	1008:4 1029:11
1022:19	wrote 948:24 969:4
well-equipped 988:8	
well-performing	
1025:19	<hr/> Y <hr/>
well-rounded 1029:20	year 949:1,8,15,20
wet 997:2	954:4,6,20 958:11
Whittier 1028:12	991:15 992:21 997:23
Whittier-la 1011:22	1002:21,22 1014:13
1023:1	1016:11 1024:17
Whittier/la 1011:4	1034:8
widely 1002:4 1003:13	year's 997:22
wildfire 1009:17	year-and-a-half
witness-specific	992:10
1034:9	year-to-year 998:1
witnesses 945:13,17	years 958:12 959:11,13
952:2 1013:11 1021:19	970:8 996:14 997:1,2,
1033:18 1035:22	14 1005:17 1013:21
1040:21 1041:17	1018:16 1024:3 1034:7
1042:25	yesterday 951:23
word 995:25 1007:9,13	yield 968:13 1009:9
1024:7	1031:16,25
words 999:14 1002:15	
1005:22 1026:18	
work 996:7 997:12,13	
998:10,24 1002:18	
1009:22	