

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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ADMINISTRATIVE LAW JUDGES RAFAEL L. LIRAG and
ELAINE LAU, co-presiding

)	EVIDENTIARY
)	HEARING
)	
Application of Pacific Gas and)	
Electric Company for Authority,)	
Among Other Things, to Increase)	Application
Rates and Charges for Electric and)	18-12-009
Gas Service Effective on January 1,)	
2020. (U39M))	
)	

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2
3
4
5
6
7
8
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10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I N D E X

WITNESSES:	PAGE
Jerry Oh	
Direct Examination By Mr. Sher	2754
Cross-Examination By Mr.	2754
Buchsbaum	
Examination By ALJ Lau	2765
Examination By ALJ Lirag	2771
Recross-Examination By Mr.	2773
Buchsbaum:	
JENNY AU	
Direct Examination By Ms.	2789
Schaefer	
Garrick Jones	
Direct Examination By Ms.	2798
Goodson:	
Cross-Examination By Ms. Zimney	2806
Examination By ALJ Lirag	2819
Redirect Examination By Ms.	2821
Goodson	
Cross-Examination By Mr. Ouborg	2822
Examination By ALJ Lau	2867
Redirect Examination By Ms.	2868
Torres	
Recross-Examination By Mr.	2871
Ouborg	
Exhibits:	
Iden.	Evid.
274	2751 2752
269	2753 2779
270	2753 2779
271	2753 2780
272	2753 2780
273	2753
274-C	2788
274, 274-C	2792
275	2793
275-C	2793
276	2794
276-R	2794
276-C	2795
276-CR	2795
277	2795
278-C	2795

1	279	2795	
	280	2797	
2	281	2797	
	282	2797	
3	283	2802	2803
	284-R	2803	
4	285	2803	2805
	286	2803	
5	286		2805
	286-C		2805
6	276, 276-R, 276-C		2872
	and 276-C-R		
7	277, 278-C and 279		2873
	280, 281 and 282		2873
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
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1 SAN FRANCISCO, CALIFORNIA

2 OCTOBER 17, 2019 9:35 a.m.

3 * * * * *

4 ADMINISTRATIVE LAW JUDGES LIRAG and

5 LAU: Let's go on the record.

6 This is the continuation of the
7 Evidentiary Hearing for PG&E's 2020 General
8 Rate Case A. 18-12-009.

9 This morning Mr. Sher from the
10 Public Advocates Office served an exhibit.
11 We will identify that exhibit as Exhibit-274.
12 It is titled Data Request Responses Regarding
13 Exhibit PG&E-4, Chapter 6, Electric
14 Distribution Maintenance.

15 (Exhibit No. 274 was marked for
16 identification.)

17 ALJ LAU: Mr. Sher, can you provide
18 more description of what this exhibit
19 provides?

20 MR. SHER: Thank you, your Honor. In
21 response to certain questions posed to
22 Mr. Calvert that he was unable to answer,
23 PG&E has agreed to allowing certain data
24 responses into the record in lieu of bringing
25 up another witness. So this data response
26 and one tomorrow should resolve those issues.

27 ALJ LAU: All right. Is there a move
28 to move this into the record?

1 MR. SHER: Yes, your Honor.

2 ALJ LAU: Any objections?

3 MS. GANDESBERY: No, your Honor.

4 ALJ LAU: So Exhibit-274 is moved into
5 the record.

6 (Exhibit No. 274 was received into
7 evidence.)

8 ALJ LAU: So let's have Mr. Jerry Oh
9 approach the witness stand.

10 Go off the record.

11 (Off the record.)

12 ALJ LAU: Back on the record.

13 Mr. Oh, can you raise your right
14 hand?

15 Jerry Oh, called as a witness by
16 Public Advocates Office, having been
sworn, testified as follows:

17 THE WITNESS: I do.

18 ALJ LAU: You may lower your right
19 hand. And can you state for the record your
20 full name, spell your last name, and also
21 give us your business address?

22 THE WITNESS: My full name is Jerry Oh.
23 Last name is spelled O-h. My business
24 address is 505 Van Ness Avenue.

25 ALJ LIRAG: All right. We will first
26 identify several exhibits. The next two
27 exhibits were provided by Mr. Oh.

28 Exhibit-269 is Mr. Jerry Oh's

1 Testimony on Summary of Earnings, Other
2 Operating Revenues, and Taxes on behalf of
3 Public Advocates Office.

4 (Exhibit No. 269 was marked for
5 identification.)

6 ALJ LAU: Exhibit-270 is Mr. Oh's
7 Workpapers Supporting His Testimony on
8 Summary of Earnings, Other Operating
9 Revenues, and Taxes.

10 (Exhibit No. 270 was marked for
11 identification.)

12 ALJ LAU: There are three
13 cross-examination exhibits from PG&E. And we
14 will identify them right now.

15 First exhibit is Exhibit-271 titled
16 Tax Authorities.

17 (Exhibit No. 271 was marked for
18 identification.)

19 ALJ LAU: Exhibit-272 is titled Cal
20 Advocates Data Response to PG&E on Taxes.

21 (Exhibit No. 272 was marked for
22 identification.)

23 ALJ LAU: Exhibit-273 is Cal Advocates
24 Data Request to PG&E-00R.

25 (Exhibit No. 273 was marked for
26 identification.)

27 ALJ LAU: All right. Mr. Sher, are you
28 ready to begin your direct?

1 MR. SHER: Yes. Thank you, your Honor.

2 ALJ LAU: Please proceed.

3 DIRECT EXAMINATION

4 BY MR. SHER:

5 Q Mr. Oh, do you have what's been
6 marked 269 and Exhibit 270 in front of you?

7 A Yes, I do.

8 Q And were those prepared by you?

9 A Yes.

10 Q And do you have any corrections to
11 make?

12 A No.

13 Q And these were true and correct to
14 the best of your knowledge?

15 A Yes.

16 Q And any opinion expressed therein
17 is based on your professional expertise?

18 A Yes.

19 MR. SHER: Your Honor, the witness is
20 available for cross-examination.

21 ALJ LIRAG: Mr. Buchsbaum.

22 CROSS-EXAMINATION

23 BY MR. BUCHSBAUM:

24 Q Thank you, your Honor. good
25 morning, Mr. Oh.

26 A Good morning.

27 Q So I wanted to get started just
28 looking at your testimony. If you could turn

1 to page 26.

2 ALJ LAU: And that's Exhibit-269.

3 BY MR. BUCHSBAUM:

4 Q Yes. This is Exhibit-269.

5 A I'm there.

6 Q And under Cal Advocates analysis,
7 your first sentence argues for keeping the
8 TMA open so that it can continue to litigate
9 any tax-related ratemaking implications
10 resulting from estimating and differences
11 between forecast and encourage deductions,
12 changes in tax law, and some other items; is
13 that correct?

14 ALJ LAU: Mr. Buchsbaum, can you
15 identify for the record what TMA is?

16 MR. BUCHSBAUM: Thank you. The TMA,
17 your Honor, is the tax memorandum account.

18 ALJ LAU: Right. And so relating to
19 taxes, there may be a lot of acronyms. We
20 should try to spell it out before we use it.

21 MR. BUCHSBAUM: Thank you, your Honor.
22 I should do that, and I will.

23 Q So if we could turn to lines 4
24 through 8 of page 27, and I'm going to
25 paraphrase your statement. You're basically
26 recommending that PG&E's account be broadened
27 to those consistent with the other utilities;
28 is that correct?

1 A Correct.

2 Q And those utilities include the
3 Sempra utilities and SCE; correct?

4 A Yes.

5 Q Can you turn to your data response?
6 This is marked 272, and tell me when you're
7 there. This is your data response dated 12th
8 of August. It's actually the second data
9 request in the tax package.

10 A I'm there.

11 Q And then the first question asks
12 you: Is Cal Advocates aware that we had a
13 identical account to that of the Sempra
14 utilities; is that correct?

15 A Yes.

16 Q And before I continue, I assume
17 that all the questions that have been asked
18 in these data responses, that your answers
19 would be the same today as they were given in
20 the past?

21 A Yes.

22 Q And in that question, we asked you
23 to confirm whether you were aware that the
24 memorandum accounts were correct -- were -- I
25 am sorry. Identical. Isn't that correct?

26 A Yes. Identical.

27 Q Can you read the quote and let's go
28 to the appropriate Bate. I'm going to try to

1 find it for you. In the PG&E GRC --

2 ALJ LAU: Off the record.

3 (Off the record.)

4 ALJ LAU: On the record.

5 BY MR. BUCHSBAUM:

6 Q Can we go to Bate-187?

7 A What Exhibit? 271?

8 Q This is Bate-187. And it's
9 footnote 267. The Bates are in the lower
10 right-hand corner. And when you're there,
11 tell me you're there. And just for the
12 record, this is PG&E 2017 GRC.

13 A Okay. Page 187 of Exhibit-271;
14 correct? Okay. I'm there.

15 Q And can you read footnote 267 into
16 the record?

17 A Footnote 267:
18 We have clarified the
19 language in the PD to
20 indicate that the
21 memorandum account is
22 'identical' to the account
23 adopted in Decision
24 16-06-054 and Decision
25 16-12-024 rather than
26 similar.
27 Unquote.

28 Q Okay. And then I would ask if you

1 could turn to Bate-156, and this is the --
2 this is the 2016 GRC of the Sempra utilities.
3 And I'm wondering if you can read -- I would
4 ask you to read in the first full paragraph,
5 there's a definition of the account. And
6 it's the second sentence from the bottom on
7 the only full paragraph on the page. And I
8 wonder if you could read that?

9 ALJ LAU: Mr. Oh, Can I request that
10 you also slow down your reading so it's
11 easier for the court reporter to transcribe?

12 THE WITNESS: All right.

13 BY MR. BUCHSBAUM:

14 Q Are you with me? It says, "The
15 account shall have separate line items"?

16 A Yes. I found it. So the sentence
17 reads:

18 The account shall have
19 separate line items
20 detailing the difference
21 between tax expenses
22 forecasted and tax expenses
23 incurred specifically
24 resulting from 1, net
25 revenue changes; 2,
26 mandatory tax law changes;
27 3, tax accounting changes,
28 tax procedural changes, or

1 tax policy changes; and 3,
2 electrical tax law changes,
3 tax accounting changes, tax
4 procedural changes, or tax
5 policy changes.

6 Q And I'd like you to read from
7 Bate-182. This is the last time we'll read
8 this into the record by the way. On
9 Bate-182, beginning at the top of the page,
10 the second full sentence beginning with, "The
11 memorandum account."

12 Are you with me?

13 A Yes. I'm there.

14 Q If you could read that into the
15 record.

16 A Says:

17 Memorandum account shall
18 have separate line items
19 detailing differences
20 between tax expense
21 forecasted and tax expenses
22 incurred. Specifically
23 resulting from net revenue
24 changes, mandatory tax law
25 changes, tax accounting
26 changes, tax procedural
27 changes, or tax policy
28 changes. And 3, elective

1 tax law changes, tax
2 accounting changes, tax
3 procedural changes, or tax
4 policy changes.

5 Q And would you agree with me subject
6 to check that the language of those two --
7 those sentences are substantively identical?

8 A Subject to check, yes. I would
9 agree.

10 Q Now, for simplicity and relying on
11 the administrative law judges' request,
12 rather than repeating -- rather than
13 repeating mandatory tax law changes, et
14 cetera, and elective tax law changes, et
15 cetera, I'm going to use the word "tax rule
16 changes," to refer to all of those items. Is
17 that acceptable to you --

18 A Yes.

19 Q -- for purposes of cross?

20 A Yes.

21 Q And can you refer to your data
22 request answer to question No. 4? This is
23 going back to Exhibit-272 and the 4th
24 question. And the question is basically for
25 the record: If PG&E agrees that the memo
26 account is identical to SDG&E and SoCalGas,
27 why does Cal Advocates recommend that the
28 Commission adopt the broadened memo account

1 for PG&E?

2 And if I characterized your
3 response correctly, you're saying that Cal
4 Advocates recommended a broadened account
5 because of the Tax Cuts and Jobs Act and
6 uncertainties and interpretations; is that
7 correct?

8 A Partially. I would say -- the
9 response was that the recommendation was to
10 be consistent with -- of those instituted for
11 SDG&E, SoCalGas, and SDG&E in light of the
12 Tax Cuts and Jobs Act and uncertainty
13 regarding interpretation so they're
14 consistent.

15 Q That's fine. Thank you. And
16 you're aware now that PG&E in its rebuttal
17 testimony agrees that the tax memo account
18 should be continued --

19 A Correct.

20 Q -- for -- to reflect tax rule
21 changes? You're --

22 A Yes. The rebuttal from PG&E's
23 stated that they now agree with the tax
24 memorandum being --

25 Q Okay. Turning to the Sempra case,
26 you're aware that on the tax issue and the
27 tax memorandum account, the TMA, there was
28 some litigation regarding the scope of the

1 tax memorandum account. Are you aware of
2 that? You were the witness in that case.

3 Well, that's okay. I can lead you
4 through it if you like?

5 A Yeah. Please do.

6 ALJ LIRAG: Mr. Buchsbaum, this is the
7 2016 Sempra?

8 MR. BUCHSBAUM: No this is -- I am
9 sorry. Let's be clear. This is the 2020
10 Sempra Decision that just --

11 ALJ LAU: 2019.

12 ALJ LIRAG: So test year 2019.

13 MR. BUCHSBAUM: Okay.

14 Q So let's turn to the recent Sempra
15 decision, Bate-209. And when you're -- you
16 might get there before me -- tell me.

17 A Okay. I'm there.

18 Q And if you refer -- I'll give you
19 an opportunity to read under the tax
20 memorandum account language so you're
21 familiar with it and able to answer some
22 questions.

23 Tell me when you're ready.

24 A I'm ready.

25 Q So the issue as I see it in these
26 paragraphs -- and we can read through them if
27 we need to -- is that basically Cal Advocates
28 was taking the position this tax memorandum

1 account should reflect all differences
2 between taxes paid and taxes estimated for
3 ratemaking purposes. While the utilities,
4 the Sempra utilities, were arguing that it
5 should just reflect tax rule changes; is that
6 correct?

7 A I'd have to review my testimony for
8 the Sempra rate case. But based on this
9 decision, I would say that my testimony for
10 Sempra was to have a broadened -- or track
11 more of a -- track more than what the
12 decision finally authorized.

13 Q Well, let's turn to the third
14 sentence under the words, "Tax memorandum
15 account." And can you read that sentence
16 into the record?

17 A Starting with "however"?

18 Q With "we agree."

19 A Okay.

20 We agree with SoCalGas that
21 the TMA is not meant as a
22 true-up mechanism for
23 actual and forecast tax
24 expenses that are not
25 caused by changes in tax
26 law, tax accounting
27 methods, tax procedures,
28 and tax policies.

1 Q Basically the tax rule changes as I
2 defined them; correct?

3 A Correct.

4 Q Then it says:

5 The TMA should continue to
6 track only differences from
7 the tax rule changes.

8 Do you see that?

9 A Well, they also have the first AI
10 net revenue changes. So additional stuff
11 besides tax rule changes.

12 Q Okay. Fair enough. But the first
13 sentence makes clear that it's -- that it
14 isn't meant as a true-up mechanism between
15 actual and forecasted taxes that are not
16 caused by changes in -- by tax rule changes;
17 correct?

18 A Yes.

19 Q And then in the last sentence, it
20 says you disagree -- it says:

21 Thus, we disagree with
22 ORA's proposal to track all
23 differences.

24 Do you see that?

25 A Yes.

26 Q And so your testimony was basically
27 founded on the principle that whatever should
28 apply to Sempra should be applied to PG&E; is

1 that correct?

2 A Yes. They would be consistent.

3 Q And do you agree that what the
4 finding here should be also applied to PG&E?

5 A Yes.

6 MR. BUCHSBAUM: I have no further
7 questions, your Honor.

8 ALJ LAU: Judge Lirag, do you have any
9 questions.

10 ALJ LIRAG: Probably not. Probably
11 best not to ask questions regarding this
12 part.

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

14 (Off the record.)

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

16 EXAMINATION

17 BY ALJ LAU:

18 Q Mr. Oh, I just want to clarify your
19 testimony. So your testimony is basically to
20 adopt Sempra's 2019 decision to align PG&E's
21 tax memorandum account to align with Sempra's
22 tax memorandum account to track only
23 differences resulting from the tax law
24 changes, and not to track all differences
25 between actual and forecasted tax expenses?

26 A So my testimony was that PG&E
27 should have a memorandum account -- a tax
28 memorandum account that tracks for the

1 different changes that are happening. And it
2 should be consistent with other utilities'
3 memorandum accounts. That would be some
4 level.

5 Q But if currently the Sempra Tax
6 Memorandum Account are somewhat -- if it was
7 somewhat different from -- let's --
8 hypothetically if it was different from
9 Edison's current tax memorandum account in
10 which Edison's tax memorandum account tracks
11 forecasted and actual tax expenses, what do
12 you mean by aligning? What do you propose
13 how we treat PG&E's tax memorandum account?

14 A From my understanding, PG&E's --
15 their -- I think the first part of the cross
16 was that PG&E's identical to SCE's. So --

17 MR. BUCHSBAUM: Excuse me. Identical
18 to Sempra.

19 THE WITNESS: Sempra. Okay.

20 So your question is if SCE's
21 memorandum account is different from Sempra
22 and PG&E?

23 BY ALJ LAU:

24 Q No. So hypothetically if Edison's
25 tax memorandum account is similar to PG&E's
26 currently but differ from Sempra's, then if
27 you were to ask for consistent treatment,
28 which consistency are you recommending as a

1 hypothetical?

2 MR. BUCHSBAUM: Well, it's a
3 hypothetical that's not correct. Because we
4 show --

5 MR. SHER: I'm sorry. Can the witness
6 respond to the question?

7 MR. BUCHSBAUM: I'm sorry. But --

8 MR. SHER: Mr. Buchsbaum, there's a
9 hypothetical put forward by the judge. The
10 witness should answer before you --

11 ALJ LAU: You will have a chance.

12 ALJ LIRAG: You can ask further
13 questions after.

14 MR. BUCHSBAUM: I'm sorry to interrupt.

15 THE WITNESS: I'm trying to wrap my
16 head around the question. I would say as
17 broadening, all three utilities should be
18 consistent in the definitions of the
19 memorandum accounts. But if there's
20 differences, I don't -- I'm trying to think
21 of the details of what SCE's memorandum
22 account is how that is different from
23 Sempra's or PG&E's.

24 BY ALJ LAU:

25 Q Can I clarify my question? Let's
26 say Edison is currently consistent with
27 PG&E's tax memorandum account to track actual
28 and forecasted tax expenses, but Sempra's tax

1 memorandum account tracks only actual tax
2 expenses and tax expenses related to any tax
3 law changes. Which -- according to your
4 testimony that you're providing today --
5 which are you asking that the Commission be
6 consistent -- for this -- for PG&E to be
7 consistent with the other utilities. What is
8 your recommendation?

9 To be consistent with Edison's,
10 which is to track actual and forecasted tax
11 expenses? Or with Sempra's if Sempra was to
12 only track actual and -- actual tax expenses
13 and forecasted expense -- or tax law changes?

14 A Hypothetically, I would go with
15 Edison because it's broader. You have more
16 information at that point.

17 From my understanding, Sempra's is
18 limited to certain qualifications: tax
19 changes, law changes. Where Edison didn't
20 have those qualifiers. So it would be a
21 broader memorandum account. Hypothetically,
22 I would support that one.

23 Q And I have another question
24 relating to the advice letter that you
25 recommended -- advice letter process that you
26 recommended. You said that if tax changes --
27 do you want me to refer you to your
28 testimony?

1 A Please.

2 Q So it's page 27 of your testimony
3 and Exhibit-269 on line 20 you say that:

4 If tax changes result in
5 significant balances, PG&E
6 should file an advice
7 letter -- annual advice
8 letter to make appropriate
9 adjustments to PG&E's base
10 rate revenue requirement.

11 Is that still your recommendation?

12 A Yes.

13 Q Do you recognize that that
14 mechanism would be similar to having a
15 true-up mechanism?

16 A I'm not sure what you mean by
17 "true-up mechanism." It's the reporting of
18 actual and forecasting.

19 Q Right. So the memorandum account
20 records costs but does not -- the Commission
21 doesn't -- hasn't given authority to -- not
22 until after reasonableness review does the
23 Commission gives authority for the treatment
24 of the expenses recorded in the memorandum
25 account.

26 But if we -- the Commission were to
27 authorize an advice letter mechanism that
28 allows tax changes to be flowed through to

1 revenue requirement, then that is essentially
2 similar to a true-up mechanism?

3 A So the question is: If the
4 Commission makes a decision on the advice
5 letter, that that turns it into a balancing
6 account?

7 Q If the Commission were to in this
8 decision for this application to allow the
9 advice letter mechanism, it is similar to --
10 the treatment would be similar, as you said,
11 to a balancing account or a true-up
12 mechanism, which I think PG&E referred to in
13 the rebuttal testimony relating?

14 A I don't believe it would -- I don't
15 believe it would be a balancing account. But
16 it would be a true-up based upon the changes
17 based on the tax law that changed. So there
18 was forecasting numbers based upon existing
19 report what the taxes are -- what the tax
20 laws are. But there's some questions about
21 it in the case of three years. And if
22 there's tax changes, then an advice letter --
23 the tax law changes, then the forecast
24 numbers change. And so at that point, an
25 advice letter should be filed to correct and
26 say, "This is what the actual changes is.
27 This is the new number."

28 Q So why -- Mr. Oh, why do you

1 propose such a mechanism? What is your
2 reasoning? What are your reasons for
3 proposing this mechanism? The advice letter?

4 A The advice letter? How else would
5 you -- between the three years that the rate
6 cases is in effect, if there's changes in the
7 tax law, how else would the utility notify
8 the Commission of the changes that the tax
9 law change impact would have on them?

10 Because just -- because you have a
11 memorandum -- it's before until the next rate
12 case. Is that would be my argument I guess.
13 Without the reporting mechanism and some
14 actions to be taken. So memorandum account
15 really doesn't serve the purpose.

16 ALJ LAU: Okay. Judge Lirag?

17 EXAMINATION

18 BY ALJ LIRAG:

19 Q Let me just clarify. So first, the
20 tax memo account will track differences in
21 change in tax law, et cetera?

22 A Yes.

23 Q And so once that is tracked and
24 there's an actual difference because of a
25 change in tax law, the advice letter will be
26 your mechanism to sort of -- I wouldn't use
27 the word "true-up" -- but sort of to apply
28 the taxes, the actual taxes based on the

1 change in tax law et cetera?

2 A I'm not sure about the actual. But
3 generally, yes. An example we like to --
4 what happened with tax adjustment when they
5 went from 34 percent to 21 percent. If there
6 was nothing happening basically until the
7 next rate case, that decrease you wouldn't
8 capture that.

9 Q So the advice letter is merely to
10 implement the 21 percent taxed, and that is
11 to be applied?

12 A Well, the 21 percent -- the advice
13 letter would be to capture or record the
14 changes that happened from 34 to 21 in that
15 example, and apply that for the duration of
16 the rate case.

17 Q And that's the purpose of the
18 advice letter is the mechanism to implement
19 that change?

20 A To capture that.

21 Q Okay.

22 ALJ LAU: Mr. Buchsbaum, do you have
23 any further cross?

24 MR. BUCHSBAUM: Yes. Can we go off the
25 record for one second?

26 ALJ LAU: Off the record.

27 (Off the record.)

28 ALJ LAU: Back on the record.

1 Mr. Buchsbaum?

2 RECROSS-EXAMINATION

3 BY MR. BUCHSBAUM:

4 Q Thank you, your Honor. So some
5 questions were asked about the Southern
6 California Edison case. Are you aware as to
7 whether there was any issue in that case
8 raised with respect to this issue of whether
9 the tax memorandum account should reflect all
10 tax changes?

11 When I use the word "all tax
12 changes," I mean tax changes involving the
13 difference between forecasted taxes and
14 actual taxes, or whether they're limited to
15 tax rule changes? Are you aware whether that
16 issue was addressed in SCE's --

17 MR. SHER: Mr. Buchsbaum, could you
18 point us to where in the Edison decision we
19 can find this?

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

21 (Off the record.)

22 ALJ LAU: Let's go on the record.

23 BY MR. BUCHSBAUM:

24 Q Thank you, your Honor. We're
25 looking at Decision 19-05-020. This is the
26 Southern California Edison 2018 General Rate
27 Case. And I'm referring within our binder to
28 Bates 192 through 195. And my question was:

1 Is there any evidence within this discussion
2 of the issue that I just raised earlier being
3 litigated?

4 MR. SHER: And before Mr. Oh answers,
5 I'd like to have an opportunity for him to
6 read these three pages.

7 ALJ LAU: Let's go off the record.]

8 (Off the record.)

9 ALJ LAU: Back on the record.

10 Mr. Buchsbaum, can you repeat your
11 question, please.

12 BY MR. BUCHSBAUM: Yes, your Honor.

13 Q Is there any discussion in the
14 Edison decision indicating a dispute in
15 interpretation between Southern California
16 Edison Company and Cal Advocates, and/or the
17 Commission, in respect to their memorandum
18 account?

19 A I don't believe there is. In the
20 decision there's a quote that said no
21 intervenor opposed this proposal. So I don't
22 believe there was a dispute.

23 Q You received some questions from
24 our judges here about whether there was an
25 option to obtaining this information through
26 some other means than the advice filling.

27 Do you remember that line of
28 questioning?

1 A I remember questions about the
2 purpose of advice letter filing then.

3 Q Do you recall the question
4 regarding the purp -- you said you recall the
5 question regarding the purpose of the advice
6 filing?

7 A Yes.

8 Q And you recall that one of those
9 purposes was to provide information of the
10 Commission; correct?

11 A Right.

12 Q And you're aware that all parties
13 to a rate proceeding have a right to
14 discovery; is that correct?

15 A Yes.

16 Q And are you aware that PG&E, from
17 time to time, has had discovery where members
18 of the Commission have requested to view its
19 tax returns?

20 A Members of the Commission, being?

21 Q Members of the staff or Cal
22 Advocates?

23 A Okay. I wasn't aware, but I can
24 imagine that happening.

25 Q And so if the Commission -- so the
26 question for you is, if the Commission has
27 the ability to request information from the
28 Utility, isn't that sufficient to provide

1 notice to the Commission of changes in its
2 taxes?

3 A I'm just having -- so your question
4 is because the Commission has the authority
5 to go in and look at PG&E's taxes, that's the
6 same as PG&E providing that information that
7 something changed to the Commission?

8 Q Not the same in that respect. But
9 the same in terms of other issues regarding
10 items unrelated to tax rule changes.

11 MR. SHER: Objection. Mr. Oh's
12 testimony is with regards to taxes. And I
13 don't understand this line of questioning. I
14 don't see how a staff person's discovery to
15 the Utility is anywhere, shape or form, close
16 to the Utility providing notification. And
17 if you look at Bates 195, it's clearly here.
18 The decision states that SCE shall notify the
19 Commission.

20 MR. BUCHSBAUM: You know --

21 ALJ LAU: Mr. Buchsbaum, can you just
22 rephrase your question to be more related to
23 Mr. Oh's testimony, in regards to the --
24 maybe -- possibly to the advice letter.

25 BY MR. BUCHSBAUM:

26 Q Okay. So one part of the advice
27 letter would relate to tax rule changes; is
28 that correct?

1 A Yes.

2 Q And the other part of the advice
3 letter that we are really concerned about is
4 the advice letter applying to all changes
5 relating to taxes -- differences between
6 taxes reflected for ratemaking purposes, and
7 taxes paid on the tax return.

8 Are you aware of the difference?

9 A The difference between the tax
10 expense forecast in the GRC, versus what you
11 actually file with the IRS?

12 Q Correct.

13 A Yes. I'm aware that there are
14 differences.

15 Q Okay. And so, in terms of
16 application of any advice filing that might
17 be required, you would understand the
18 difference between an advice filing that
19 would apply to tax rule changes and one that
20 would apply to all tax changes?

21 A The advice letter filing would be
22 based on changes that happened within the tax
23 law. So for the -- so that would be
24 different than just because you had -- the
25 taxes that you actually file with the IRS.

26 Q So you're in agreement that the --
27 that any advice filing under your proposal
28 would be limited to those arising from tax

1 rule changes?

2 A Yes.

3 Q Okay. You received a hypothetical
4 before, relating to a situation where PG&E's
5 account was the same as Edison's but
6 different than Sempra.

7 Do you recall that question?

8 A Yes.

9 Q And wasn't it your testimony
10 earlier today that the PG&E account was the
11 same as Sempra's?

12 A So that was in my data response
13 that I was not aware that they were
14 identical. But I think we read through the
15 decisions for -- I think, subject to check,
16 that they were is similar.

17 Q Well, they were not just similar.
18 But they were substantively identical;
19 correct?

20 A Yes.

21 MR. BUCHSBAUM: Okay. I have no
22 further questions.

23 ALJ LAU: All right.

24 Mr. Sher?

25 MR. SHER: Best not, your Honor.

26 ALJ LAU: All right.

27 Judge Lirag?

28 (No response.)

1 ALJ LAU: All right. Let us take up
2 some exhibits then.

3 So Mr. Sher, do you move
4 Exhibits 269 and 270 into the record?

5 MR. SHER: Yes. Thank you.

6 ALJ LAU: Any objections?

7 Hearing none, Exhibits 269 and 270
8 are moved into the record.

9 (Exhibit No. 269 was received into
10 evidence.)

11 (Exhibit No. 270 was received into
12 evidence.)

13 ALJ LAU: Mr. Buchsbaum, do you have a
14 motion to move Exhibits 271, 272, and 273
15 into the record?

16 MR. BUCHSBAUM: Yes, I do, your Honor.

17 ALJ LAU. Exhibits 271 --

18 MR. SHER: I'm sorry, your Honor. Just
19 a quick question before they you get moved --

20 ALJ LAU: Right.

21 MR. SHER: -- in, I don't recall -- and
22 this could be my error, that any questions
23 were asked on 273.

24 ALJ LAU: Right. So, Mr. Sher, are you
25 objecting to the admission of 273?

26 MR. SHER: Yes.

27 ALJ LAU: All right. Because no
28 questions -- would any objection -- any
response to Mr. Sher's objection?

1 MR. BUCHSBAUM: Yeah. I mean, I could
2 start asking the questions.

3 MR. SHER: No. He waived. And we're
4 done. And he didn't ask any questions. He
5 had an opportunity; it's done.

6 MR. BUCHSBAUM: Right. So, because no
7 questions ` asked of 273, Exhibit 273 is
8 denied -- admission into the record of
9 Exhibit 237 is denied.

10 Mr. Sher, are you objecting to
11 Exhibits 271 and 272 into the record?

12 MR. SHER: No.

13 ALJ LAU: Okay. Exhibits 271 and 272
14 are admitted into the record.

15 (Exhibit No. 271 was received into
16 evidence.)

17 (Exhibit No. 272 was received into
18 evidence.)

19 ALJ LAU: Mr. Oh, you are excused.

20 THE WITNESS: Thank you.

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

22 (Off the record.)

23 ALJ LAU: All right. Let's go on the
24 record.

25 We would like to take this time to
26 address the motion by the City of San
27 Francisco to inter into evidence the
28 declaration of Douglas Lipps in response to
PG&E's testimony related to its cross bore

1 work in San Francisco. So, we have received
2 a response to from PG&E.

3 And clarify me, if I'm wrong. PG&E
4 states in its response that there are certain
5 items that are out of scope. And these items
6 include -- does it only include the amendment
7 between -- or the agreement between the City
8 of San Francisco and PG&E?

9 So the items that are out of scope,
10 does it only include the agreement between
11 PG&E and City of San Francisco?

12 MR. OUBORG: I think it would include
13 the proposed agreement amendment and the
14 discussions that are ongoing around that,
15 your Honor. And I think it would include the
16 issues that are being addressed as part of
17 that negotiation between the parties. These
18 are the specifics about what it's going to
19 take to resolve UTAs.

20 PG&E never made a statement that San
21 Francisco is at fault for PG&E not being able
22 to do any UTAs. We've identified UTAs.
23 We've identified the kinds of issues that
24 caused these UTAs. Our witness on the stand
25 said that not all of these would require the
26 City's cooperation. But these are the very
27 -- given the nature of the variety of issues,
28 the different kinds of blockage, the

1 different kinds of permits, these are the
2 kinds of things we're interacting with the
3 City on.

4 So our position is that those are
5 for the parties to resolve. And what belongs
6 in the GRC is whether our forecast of cross
7 bores is reasonable, with our unit cost for
8 doing that work was reasonable, for the
9 forecast period. And how we get that work
10 done is, in essence, our responsibility. And
11 the details of that are the kinds of issues
12 we're working on with the City, your Honor.

13 ALJ LAU: Mr. Sanders, do you have a
14 response to Mr. Ouborg.

15 MR. SANDERS: Yes. I think that, you
16 know, it's not our purpose here to litigate
17 PG&E's performance of its cross bore
18 obligations in San Francisco. It's only our
19 purpose here with this motion and with this
20 declaration to clarify the record. And I
21 think there was testimony that, sort of,
22 attempted to put the onus on the lack of
23 completion of the cross bore remediation in
24 San Francisco, on San Francisco.

25 And there are also some, you know,
26 numbers concerning UTAs which seem completely
27 out of scope with what we understand. And
28 this is from the person who has been dealing

1 with this from day one. So, really, the
2 purpose of this motion and this declaration
3 is very limited. And we're only just trying
4 to clarify the record.

5 ALJ LAU: Okay. So we have decided to
6 grant, in part, the motion of City of San
7 Francisco, subject to several conditions.
8 But we are striking a portion of Douglas
9 Lipps' testimony in relation to the agreement
10 between the City of San Francisco and PG&E,
11 any proposed agreements and any issues
12 related to the negotiations between --
13 proposed or established agreements between
14 PG&E and the City of San Francisco.

15 So the conditions that we impose is
16 that PG&E shall be given the opportunity to
17 file -- to serve a rebuttal testimony -- and
18 we can coordinate on a date for that -- and
19 that the witnesses sponsoring the testimony,
20 meaning Mr. Douglas Lipps, and the witness
21 sponsoring PG&E's rebuttal testimony shall be
22 subject to cross-examination on November 6th,
23 2019. And, also, on November 6th, 2019, PG&E
24 shall be given an opportunity to mark the
25 items -- to propose the items that should be
26 stricken that are outside of scope.

27 MR. SANDERS: Can I just ask a
28 question?

1 Did you say you were striking any
2 testimony related to the existing agreement
3 and the proposed amendment?

4 ALJ LAU: Both.

5 MR. SANDERS: Both.

6 So any discuss of the agreement
7 between PG&E and the City with regard to
8 cross bores is going to be stricken?

9 ALJ LIRAG: Think of it as guidance for
10 what will be stricken. The ultimate decision
11 will be during the hearing date on
12 November 6th. So that's providing guidance
13 to both parties.

14 PG&E will be given the chance to
15 propose what they propose to strike so we
16 know exactly what they are proposing to
17 strike. And then it will be reviewed as the
18 testimony goes on.

19 MR. SANDERS: And is there a date for
20 PG&E's testimony? You have a date for the
21 cross-examination.

22 ALJ LAU: Let go off the record.

23 (Off the record.)

24 ALJ LAU: So let's go back on the
25 record.

26 So the conditions we impose upon
27 granting the City of San Francisco motion
28 shall be the following:

1 That PG&E -- on November 1st, City
2 of San Francisco and PG&E shall serve their
3 versions of the testimony, including the
4 lines that should be stricken. And, also, on
5 November 1st, PG&E shall be afforded the
6 opportunity to serve rebuttal testimony on
7 Mr. Douglas Lipps' testimony. And on
8 November 6, 2019, the witnesses sponsoring
9 the testimonies of City of San Francisco and
10 PG&E's rebuttal shall be subject to
11 cross-examination.

12 And the primary reason we are
13 granting the City of San Francisco's motion
14 is that we believe that the testimony
15 provided provides the Commission with
16 information that we find useful, relating to
17 the deferred work issues on the cross bore
18 program. And we find that the testimony
19 given by Mr. Douglas Lipps is analogous to an
20 impeachment testimony of the
21 cross-examination testimony provided by PG&E
22 in response to PG&E's cross-examination -- in
23 response to PG&E's witness. And so we do not
24 believe that PG&E's prejudiced by the late
25 filing of the City of San Francisco's
26 testimony. And so that is ruled.

27 ALJ LIRAG: So, to clarify, on
28 November 1st, it's either you submit separate

1 proposals or a joint proposal, if a joint
2 proposal is agreed upon on the revision to
3 the declaration of Mr. Lipps. Also, let's
4 add that both -- let's coordinate on whether
5 a hearing is needed. And I'll assign it to
6 PG&E, subject to Mr. Sander's agreement and
7 Ms. Goodson's, that if a hearing is not
8 needed, PG&E has until November 5 to notify
9 us whether a hearing is needed on this
10 matter. And the notification is simply an
11 e-mail to the service list.

12 And then let's give Ms. Goodson a
13 chance to say any comments, which we should
14 have done before.

15 MS. GOODSON: No, that's just fine.

16 While we were off the record, Mr.
17 Sanders and I spoke briefly about the
18 possible need for a party purchasing an
19 expedited hearing transcript, if we do have
20 hearings on the 6th, because of how soon
21 opening briefs are due after that. But it
22 seems that that's something that we can work
23 out, should the time come.

24 ALJ LIRAG: All right. So, tomorrow,
25 we shall also -- in light of these
26 developments, we should also discuss the
27 schedule regarding opening briefs. And if
28 there is a need to move back the schedule, we

1 don't think the process of coming up with a
2 proposed decision will be delayed if the --
3 if there's a need to move to schedule for the
4 filing of opening and reply briefs.

5 MS. GOODSON: Thank you.

6 ALJ LIRAG: Sounds good.

7 ALJ LAU: All right. Let's go off the
8 record.

9 (Off the record.)

10 ALJ LAU: Back on record.

11 On the witness stand we have Ms.
12 Jenny Au. Hi, Ms. Au.

13 Can you raise your right hand?

14 JENNY AU, called as a witness by
15 Office of Safety Advocates, having been
16 sworn, testified as follows:

17 THE WITNESS: Yes, I do.

18 ALJ LAU: Can you please turn on your
19 microphone?

20 THE WITNESS: Yes, I do.

21 ALJ LAU: You may lower your right
22 hand. Thank you.

23 Ms. Au, can you state for the record
24 your full name, spelling your last name, and
25 also give us your business address.

26 THE WITNESS: Jenny Au, A-U. My
27 business address is 320 West 4th, Street,
28 Suite 500, Los Angeles, California, 90013.

ALJ LAU: Okay. So, first, before us

1 we have several exhibits. We will identify
2 them right now.

3 Exhibit 274 is the prepared
4 testimony of several witnesses on behalf of
5 Office of the Safety Advocates. And this
6 includes the testimony of Ms. Jenny Au.

7 (Exhibit No. 274 was previously
8 marked for identification.)

9 ALJ LAU: Exhibit 274-C is a
10 confidential version of the prepared
11 testimony of the Office of the Safety
12 Advocates.

13 (Exhibit No. 274-C was marked for
14 identification.)

15 ALJ LAU: Ms. Schaefer, can you explain
16 the confidential nature of this exhibit?

17 MS. SCHAEFER: Yes. The confidential
18 nature of the exhibits contains
19 personnel-identified information provided by
20 PG&E?

21 ALJ LAU: You mean personnel
22 information -- personnel data?

23 MS. SCHAEFER: Yes.

24 ALJ LAU: Because we ruled earlier that
25 personnel data is confidential, we will allow
26 the confidential nature of this exhibit.

27 There is also -- in this exhibit,
28 Exhibit 274-C, is also a CD. Ms. Schaefer,
can you describe what's in the CD and whether

1 the CD that you provided to us is archival
2 grade in accordance to Rules of Practice and
3 Procedure.

4 MS. SCHAEFER: Yes. The CD contains
5 the attachments that were provided on our
6 testimony that was served. There's both a
7 confidential and public version of the CD.
8 And the confidential version contains the
9 personnel information. And everything is in
10 accordance with the Rules of Practice and
11 Procedure on the CD.

12 ALJ LAU: Okay. All right. Thank you.

13 Ms. Schaefer, are you ready to begin
14 your direct?

15 MS. SCHAEFER: Yes, I am.

16 ALJ LAU: Please proceed.

17 MS. SCHAEFER: Thank you so much.

18 DIRECT EXAMINATION

19 BY MS. SCHAEFER:

20 Q Ms. Au, do you have the Exhibit 274
21 confidential version in front of you?

22 A Yes, I do.

23 Q Okay. Thank you.

24 Please specify the testimony that
25 you are sponsoring in this exhibit.]

26 A In this testimony I'm sponsoring,
27 Chapter 4, which is on gas operations.

28 Q Do you have any clarifications or

1 corrections you'd like to make to your
2 chapter at this time?

3 A Yes, I do. On page 4-4, line 6,
4 the -- "PG&E over 55 years." That "55"
5 should be 72.

6 Page 4-4, line 6. The number "55"
7 should be 72. Which is in the footnote.

8 And -- so you want corrections?

9 Q Yes. Please continue with any
10 corrections or amendments.

11 A Okay. In light of the rebuttal
12 testimony that PG&E provided, what they would
13 like to withdraw is recommendation regarding
14 to the Over Pressure Protection Proposal.

15 ALJ LAU: Ms. Au, would you point us to
16 where in your testimony is regarding to the
17 proposal?

18 THE WITNESS: It's on page 4-9.

19 ALJ LAU: Over pressure --

20 THE WITNESS: OPP Enhancement Program.

21 ALJ LAU: So 4-9 to 4-14 --

22 THE WITNESS: Yes.

23 ALJ LAU: -- is stricken.

24 MS. SCHAEFER: That's all of the direct
25 I have I believe.

26 Q Unless you have any more amendments
27 that you'd like to make?

28 A I'm currently a senior UE with the

1 Energy Division. When I prepared the
2 testimony, I was working for the Office of
3 the Safety Advocates. Today I'm testifying
4 in that role.

5 ALJ LAU: Let's go off the record.
6 (Off the record.)

7 ALJ LAU: Back on the record.

8 Ms. Au, do you have further
9 corrections to make?

10 THE WITNESS: Yes. Let's start with
11 page 3, lines 31 to 34.

12 MR. OUBORG: Your Honor, sorry. I
13 don't think the witness intended to strike
14 the bullet --

15 THE WITNESS: Sorry. Thank you. Just
16 line 33 to 34.

17 ALJ LAU: Just to clarify, we're
18 striking 33 to 34 only.

19 THE WITNESS: And page 4-1, lines 17 to
20 21.

21 ALJ LAU: Is there also -- Ms. Au, is
22 there also a correction to line 8 to 9?

23 THE WITNESS: Yes. Line 8 starting
24 with "on measurements and control." To the
25 end of line 9.

26 ALJ LAU: Are those all the
27 corrections, Ms. Au?

28 THE WITNESS: Do you want me to correct

1 my statement of qualifications?

2 That's it.

3 ALJ LAU: Ms. Schaefer, is Ms. Au ready
4 to be crossed?

5 MS. SCHAEFER: She is. Thank you.

6 ALJ LAU: Mr. Ouborg.

7 MR. OUBORG: Thank you, your Honor.

8 All my questions are related to the
9 testimony that's been withdrawn. So I have
10 no cross with Ms. Au at this point.

11 ALJ LAU: Okay. So let's take up the
12 testimony from Ms. Au then.

13 Is there a motion to move
14 Exhibit 274 and 274-C into the record?

15 MS. SCHAEFER: Yes.

16 ALJ LAU: Any objections.

17 (No response.)

18 ALJ LAU: Hearing none, Exhibits 274
19 and 274-C is moved into the record.

20 (Exhibit No. 274, 274-C was received
21 into evidence.)

22 ALJ LAU: Let's take a break until
23 11:15. And when we come back, we will have
24 Mr. Garrick Jones on the witness stand.

25 All right. Thank you.

26 Off you off the record.

27 (Off the record.)

28 ALJ LIRAG: Let's go on the record.

1 We're back from our morning break.
2 And before we start with Mr. Jones, we'd just
3 like to do a correction on the numbering of
4 the exhibits that were just identified.

5 So we had identified as Exhibit-274,
6 the Direct testimony of Jenny Au from OSA.
7 And this should be Exhibit-275.

8 Just to clarify 274 was the
9 cross-examination presented by Mr. Sher. So
10 we did that out of order, which probably
11 caused the numbering error.

12 So, again, the exhibit submitted by
13 Mr. Sher remains 274, and this is the data
14 request responses regarding exhibit premarked
15 PG&E-4, Chapter 6 on electric distribution
16 maintenance. So that remains Exhibit-274.

17 Exhibit-275 will be the prepared
18 testimony of Jenny Au.

19 (Exhibit No. 275 was marked for
20 identification.)

21 ALJ LIRAG: And the confidential
22 version shall be 275-C instead of 274-C.

23 (Exhibit No. 275-C was marked for
24 identification.)

25 MS. GANDESBERY: Your Honor?

26 ALJ LIRAG: Yes, Ms. Gandesbery?

27 MS. GANDESBERY: Your Honor, we agreed
28 that OSA's going to serve a new version of

1 its testimony and distribute it to the
2 service list.

3 ALJ LIRAG: We'll keep this for now,
4 and then we'll substitute these documents
5 that we have with the revised version that
6 will be served later on.

7 And we spoke with Ms. Schaefer
8 before she left for the break, and she agreed
9 to the numbering change just to clarify.

10 All right. Let's go off the record.

11 (Off the record.)

12 ALJ LAU: Go on the record.

13 We will first identify some
14 exhibits. First is Exhibit-276. This is The
15 Prepared Testimony of Garrick Jones on Behalf
16 of The Utility Reform Network Addressing
17 Various Gas and Electric Distribution,
18 Customer Service, and AMG Procedurals in
19 PG&E's 2020 GRC.

20 (Exhibit No. 276 was marked for
21 identification.)

22 ALJ LAU: Exhibit 276-R, is a redline
23 version of the prepared testimony of Garrick
24 Jones i.e. Exhibit-276.

25 (Exhibit No. 276-R was marked for
26 identification.)

27 ALJ LAU: Exhibit 276-C is The
28 Confidential Version of the Prepared

1 Testimony of Garrick Jones.

2 (Exhibit No. 276-C was marked for
3 identification.)

4 ALJ LAU: And Exhibit 276-CR, is The
5 Confidential Version of the Redline Version
6 of the Prepared Testimony of Garrick Jones.

7 (Exhibit No. 276-CR was marked for
8 identification.)

9 ALJ LAU: Exhibit-277 is The Attachment
10 to The Prepared Testimony of Garrick Jones.

11 (Exhibit No. 277 was marked for
12 identification.)

13 ALJ LAU: Exhibit 278-C is The
14 Confidential Version of --

15 ALJ LIRAG: It's not a version of
16 anything. It's a standalone confidential
17 document.

18 ALJ LAU: Okay. Exhibit 278-C is
19 titled Confidential Attachments to the
20 Prepared Testimony of Garrick Jones.

21 (Exhibit No. 278-C was marked for
22 identification.)

23 ALJ LAU: And Exhibit-279 is titled
24 Errata to TURN-3 with redline changes to
25 October 11, 2019 Version.

26 (Exhibit No. 279 was marked for
27 identification.)

28 ALJ LAU: Ms. Goodson, can you explain

1 what is the confidential nature of
2 Exhibit 276-C, Exhibit 276-CR, and
3 Exhibit 278-C?

4 MS. GOODSON: Yes, your Honor. Those
5 documents contain information related to
6 Aviation Services that PG&E has identified as
7 confidential and provided to TURN pursuant to
8 our nondisclosure agreement. So according to
9 that agreement, TURN has treated that
10 information as confidential.

11 ALJ LAU: PG&E, why is the Aviation
12 data that is provided confidential?

13 MR. OUBORG: Your Honor, one of them is
14 an agreement with a service provider
15 providing operational maintenance services
16 for our aircraft and contains sensitive
17 commercial terms pricing, quantity, terms of
18 service which the vendor regards as
19 confidential.

20 The second one is a contract with a
21 purchase of helicopters, which similarly has
22 pricing and other commercially sensitive
23 information.

24 ALJ LAU: And so given that good cause
25 is shown, we grant the confidential nature of
26 those documents. Exhibits 276-C,
27 Exhibit 276-CR, and Exhibit 278-C.

28 All right. Now we have

1 cross-examination exhibits from PG&E. We
2 will also identify them. We have three
3 exhibits.

4 Exhibit-280 is titled CAL FIRE
5 Commonly Used Fire Terminology.

6 (Exhibit No. 280 was marked for
7 identification.)

8 ALJ LAU: Exhibit-281 is Exhibit-G of
9 the 2018 to 2023 California Master
10 Cooperative Wildland Fire Management and
11 Stafford Act Response Agreement.

12 (Exhibit No. 281 was marked for
13 identification.)

14 ALJ LAU: Exhibit-282 is TURN's
15 response to PG&E's Data Request TURN-004.

16 (Exhibit No. 282 was marked for
17 identification.)

18 ALJ LAU: So right now we have
19 Mr. Garrick Jones on the witness stand. Good
20 morning, Mr. Jones.

21 THE WITNESS: Good morning.

22 ALJ LAU: Can you raise your right
23 hand?

24 Garrick Jones, called as a witness
25 by TURN, having been sworn, testified
as follows:

26 THE WITNESS: I do.

27 ALJ LAU: You may lower your right
28 hand. Can you please state for the record

1 your full name, spelling your last name, and
2 give us your business address?

3 THE WITNESS: Garrick Jones, J-o-n-e-s.
4 3104 O Street Sacramento, California.

5 ALJ LAU: All right. Thank you,
6 Mr. Jones.

7 Ms. Goodson, can you please proceed
8 with your direct?

9 DIRECT EXAMINATION

10 BY MS. GOODSON:

11 Q Yes, thank you, your Honor.

12 Mr. Jones, do you have before you
13 the documents that have been identified as --
14 I'm just going to do the series and make this
15 shorter. Exhibit 276 through 279?

16 A I am sorry. I think I missed what
17 279 is.

18 Q 279 is the Errata to TURN-03
19 redline changes to October 11, 2019 version.

20 A Yes, thank you.

21 Q Do you have all of those documents
22 before you?

23 A I do.

24 Q And were these prepared by you
25 Mr. Jones?

26 A Yes, they were.

27 Q And to the extent they express
28 facts, are they true and correct to the best

1 of your knowledge?

2 A Yes.

3 Q And to the extent they express
4 opinions, are they consistent with your best
5 professional judgment?

6 A They are.

7 Q And, Mr. Jones, Exhibit-279 is the
8 additional errata. And because parties
9 haven't seen this before, other than PG&E, I
10 was hoping you could briefly explain the
11 nature of these changes?

12 MS. GOODSON: And, your Honors, I'll
13 just explain rather than do this orally on
14 the stand, we put in writing some last-minute
15 eratta and have submitted them only in
16 redline for clarity.

17 Q But, Mr. Jones, if you would just
18 explain briefly, that would be helpful.

19 A Sure. So turning to the first
20 page, which on the testimony is page 19, I've
21 updated several numbers so that they are
22 consistent with edits that I made to Tables 3
23 and 5 from my testimony. They didn't -- the
24 changes did not get made originally.

25 This is the same -- this is the
26 case also for page 20, which is the next page
27 of this exhibit. The third page of the
28 exhibit, page 48, from the testimony is

1 simply a formatting update and a more
2 accurate description of what is following
3 from the testimony.

4 The fourth page, page 54, is Table
5 8. I've struck -- I've removed errant
6 superscripts. In these cases 10 and 11 and
7 simply updated the percentage of capital
8 costs -- the calculation of capital costs.
9 I've updated the percentage from 16.5 percent
10 to 14 percent. It doesn't affect the numbers
11 in the table. The numbers in the table come
12 from calculations that used 14 percent.

13 And then the final page, page 60,
14 from the testimony. The first -- so at lines
15 9 and 10, I've simply updated the values to
16 conform with the calculation that's described
17 in footnote 169. And the difference in 169
18 -- footnote 169 is simply that I erroneously
19 used \$31 million instead of \$31.5 million.
20 And that changes the result of the
21 calculation. In addition the calculation
22 simply was not described correctly, so I put
23 in the total hours that we can see there.

24 And footnote 170, the changes are
25 simply to update the original calculation,
26 which was for capital expenses. I updated it
27 so it conformed with O&M. That's it.

28 Q Thank you very much.

1 MS. GOODSON: Your Honors, this witness
2 is available for cross-examination.

3 ALJ LAU: Ms. Zimney we are looking at
4 -- would you be able to finish your first
5 line of questions in around 20 minutes before
6 we break for lunch?

7 ALJ LIRAG: Hang on, ALJ Lau.
8 My suggestion is to -- is that
9 estimate fairly accurate 85 minutes?

10 MS. ZIMNEY: My portion would be
11 30 minutes. But I --

12 ALJ LIRAG: Tag team with Ms. Slocum?

13 MS. ZIMNEY: Mr. Ouborg.

14 ALJ LIRAG: Why don't we just break for
15 lunch now, and then start fresh instead of
16 having to cut you off. Let's come back at
17 1:00 p.m. And also before you head off for
18 lunch, probably PG&E can confer -- or
19 Ms. Zimney and Mr. Ouborg can confer with
20 Ms. Goodson and Ms. Torres if needed
21 regarding these various corrections if
22 there's any clarifications that are needed.
23 Because it might change the cross-examination
24 somewhat since some of them are substantive.

25 Let's take a break -- our lunch
26 break now if ALJ Lau doesn't mind and come
27 back at 1:00.

28 Off the record.

1 (Off the record.)]

2 ALJ LIRAG: All right. Let's go back
3 on the record.

4 While we were off the record,
5 exhibits were distributed. And we'll
6 identify them right now.

7 First up is Exhibit 283. And it is
8 a document entitled "Depreciation Stipulation
9 Regarding PG&E's Test-Year 2020 General Rate
10 Case."

11 (Exhibit No. 283 was marked for
12 identification.)

13 ALJ LIRAG: Let's have Ms. Gandesbery
14 move this into the record.

15 MS. GANDESBERY: Yes, your Honor.

16 We would like to move this into the
17 record. It's a depreciation stipulation
18 between and among The Utility Reform Network,
19 the Public Advocates Office, and PG&E. The
20 sponsoring witnesses are listed as PG&E's
21 witness Beatrix Greenwell and Ned Allis, Cal
22 Advocates witness Chris Lambert, and TURN's
23 witness David Garrett.

24 ALJ LIRAG: All right. On the subject
25 of depreciation. So it's good we have TURN
26 and Cal PA here.

27 Any objections to the document?

28 MS. GOODSON: No your Honor.

1 MS. SHEK: No, your Honor.

2 ALJ LIRAG: All right. Exhibit 283 is
3 received into the record.

4 (Exhibit No. 283 was received into
5 evidence.)

6 ALJ LIRAG: Next, we will identify
7 Exhibit 284-R. And this is the redline
8 version of the prepared testimony of
9 Mr. Finkelstein.

10 (Exhibit No. 284-R was marked for
11 identification.)

12 ALJ LIRAG: Next, Exhibit 285 is
13 responses -- PG&E's Response to TURN Data
14 Request 109. So that that's Exhibit 258.

15 (Exhibit No. 285 was marked for
16 identification.)

17 ALJ LIRAG: Exhibit 286 is a document
18 entitled -- correction. This is responses to
19 TURN Data Request 90, Responses 2 to 6,
20 Response to Data Request 103, Responses 2 to
21 3 and 5 to 8, and Responses to TURN Data
22 Request 63, Response 1.

23 So those are PG&E's responses. And,
24 again, that is Exhibit 286.

25 (Exhibit No. 286 was marked for
26 identification.)

27 ALJ LIRAG: Exhibit 286-C is the
28 confidential version of the document we had

1 just described as Exhibit 286.

2 And question to Ms. Goodson
3 regarding the confidential nature of
4 Exhibit 286-C.

5 MS. GOODSON: Yes, your Honor.

6 TURN has identified this as
7 confidential because it includes information
8 that PG&E provided to TURN related to
9 insurance. And PG&E deemed that information
10 confidential. And so, consistent with our
11 non-disclosure agreement, we are treating it
12 thusly.

13 ALJ LIRAG: All right. And I believe
14 we already ruled previously in one of that
15 hearings that that information is
16 Confidential when we tackled -- or when we
17 dealt with PG&E's exhibits relating to
18 insurance. And so, we accept the
19 confidential nature of Exhibit 286-C.

20 So, with that, Ms. Goodson, is there
21 a move to admit Exhibits 284 and 284-R,
22 first, into the record.

23 MS. GOODSON: Yes, your Honor.

24 ALJ LIRAG: Any objections?

25 MS. GANDESBERY: No objection, your
26 Honor.

27 ALJ LIRAG: Hearing none, Exhibits 284
28 and 284-R are received into the record.

1 And then a move to admit
2 Exhibits 285, 286, and 286-C into the record?

3	Ms. Goodson?
---	--------------

4 MS. GOODSON: Yes, your Honor.

5 ALJ LIRAG: Any objections?

6 MS. GANDESBERY: No, your Honor.

7 ALJ LIRAG: Hearing none, Exhibits 285,
8 286, and 286-C are received into the record
9 as well.

10 (Exhibit No. 285 was received into
evidence.)

12 (Exhibit No. 286 was received into evidence.)

13 (Exhibit No. 286-C was received into
evidence.)

15 ALJ LIRAG: Thank you.

16 I think that takes care of the
17 exhibit business. And so we can take care of
18 lunch business. So let's go on our lunch
19 break. And let's still take the longest
20 lunch break ever on this series of GRC for
21 PG&E's 2020 General Rate Case. So let's come
22 back at 1:10 on that clock.

23 Off the record. 1

24 (Whereupon, at the hour of 11:49
a.m. a recess was taken until 1:10
25 p.m.)

* * * * *

1 AFTERNOON SESSION - 1:14 P.M.

2

3 * * * * *

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

5 So it seems that today PG&E served
6 the common briefing outline, and so we will
7 follow that common briefing outline that PG&E
8 served.

9 So we are back from lunch recess.
10 It is now 1:15. We have on the stand Mr.
11 Garrick Jones, who we've already sworn in,
12 and Ms. Goodson already performed the direct
13 examination. And Mr. Jones is ready to be
14 crossed.

15 So Ms. Zimney, can you begin your
16 cross. Thank you.

17 MS. ZIMNEY: Yes. Thank you, your
18 Honor.

19 CROSS-EXAMINATION

20 BY MS. ZIMNEY:

21 Q Good afternoon, Mr. Jones. First
22 of all, I'll be questioning you on the
23 customer service offices, and then my
24 colleague Peter Ouborg will be asking you gas
25 and aviation as a preliminary matter.

26 So regarding the CSOs, first
27 looking at your statement of qualifications
28 in attachment 1 of your testimony, which is

1 marked as Exhibit 276, it appears you
2 testified and provided support for testimony
3 before the CPUC on several different matters
4 throughout your career. Have you previously
5 worked -- in your work on the testimony, have
6 you worked on customer service or customer
7 care before?

8 A Not to my recollection.

9 Q Turning to the body of your
10 testimony on page 30, starting at line 17 --

11 ALJ LAU: Ms. Zimney, that is
12 Exhibit --

13 MS. ZIMNEY: Exhibit 276.

14 ALJ LAU: Thank you.

15 THE WITNESS: Can you say which page
16 again, please.

17 BY MS. ZIMNEY:

18 Q Page 30, line 17.

19 A Okay. I'm there.

20 Q You stated that while some cash
21 paying customers may have access to
22 banking -- excuse me -- have access to
23 banking service it's at least possible that
24 some do not, correct?

25 A I'm sorry. I think I'm looking at
26 the wrong document.

27 MS. GOODSON: I think I am too.

28 ALJ LAU: I think -- yes, the page and

1 line reference is different items.

2 MS. GOODSON: Are you working off of
3 the version that was revised on October 11th?

4 MS. ZIMNEY: I may not be.

5 ALJ LAU: Let's go off the record.
6 (Off the record.)

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

8 BY MS. ZIMNEY:

9 Q Thank you. So we're looking at
10 Section A, payment transactions, second
11 paragraph, the first line starting with,
12 "While some cash paying customers."

13 A Okay. I'm there.

14 Q Thank you. So you stated, "While
15 some cash paying customers may have access to
16 banking services, it is at least possible
17 that some do not," correct?

18 A Yes.

19 Q Are you familiar with PG&E's
20 neighborhood payment centers or NPCs?

21 A Generally.

22 Q Isn't it true that unbanked or
23 underbanked customers can make cash payments
24 at an NPC?

25 A Yes, that's true.

26 Q Isn't it true that an NPC can
27 provide in-person bill pay as effectively as
28 a CSO?

1 A I'm not sure about that.

2 Q It's true that customers can pay
3 their bills there in person, though, correct?

4 A Correct.

5 Q Isn't it true that PG&E has 565
6 NPCs?

7 A If you say so.

8 Q On -- I'm looking at page 33 of
9 your testimony -- of the original testimony,
10 lines 9 to 10 right under Section (b),
11 nonpayment transactions.

12 A Okay.

13 Q You state that nonpayment
14 transactions, or NPTs, warrant special
15 attention because CSOs provide the only
16 in-person opportunity for customers to handle
17 a list of matters that you've provided,
18 correct?

19 A Yes.

20 Q And all of these services can be
21 handled over the phone, correct?

22 A Likely most of them. I don't know
23 about all of them categorically.

24 Q Are you aware that Southern
25 California Edison, or SCE, just received
26 approval to close the last of its in-person
27 payment offices?

28 A SoCalGas, you say?

1 Q Correct -- or, no, Southern
2 California Edison.

3 A Oh. Edison.

4 Q SCE.

5 A I think I remember seeing that,
6 yes.

7 Q Their payment offices don't provide
8 services for nonpayment transactions, do
9 they?

10 A I think that's correct, yes.

11 Q So --

12 MS. GOODSON: Your Honor, just a moment
13 here, if I may, Ms. Zimney. I just want to
14 be clear if Mr. Garrick is testifying from
15 knowledge or if he's just generally assuming
16 that what you're saying is correct just so
17 we're clear here. So would you mind going
18 back and giving Mr. Jones -- I'm actually not
19 sure if he's familiar with the Commission's
20 resolution or not. So I think it would be
21 helpful for the record to know what Mr. Jones
22 is personally attesting to from his own
23 knowledge versus just sort of allowing you to
24 move along. I thought that was unclear in
25 his responses.

26 ALJ LAU: Ms. Zimney, how about --

27 MS. ZIMNEY: I can reask the question.

28 ALJ LAU: -- hypothetically if these are

1 true, and then you can ask your question. So
2 assuming that --

3 MS. ZIMNEY: I guess I'm asking about
4 his specific knowledge.

5 ALJ LAU: Okay. All right.

6 MS. ZIMNEY: So if he wants to respond
7 that he's not aware, that's fine.

8 Q My first question was whether
9 you're aware if SCE had received approval to
10 close the last of its payment offices?

11 A I seem to remember that, but I
12 don't know the specifics.

13 Q Okay. And do you know whether
14 these payment offices provide services for
15 nonpayment transactions?

16 A I don't know.

17 Q Okay. And on lines -- again, it
18 was -- in the same section, the first
19 paragraph under nonpayment transactions,
20 Section (b), the end of that paragraph, you
21 stated that nonpayment transactions are the
22 reason the Commission has historically
23 considered the distance to the nearest CSO
24 when evaluating CSO closures; is that
25 correct?

26 A I'm having trouble finding the
27 reference.

28 MS. GOODSON: This is page 34, lines 17

1 to 19 is where Ms. Zimney is referring.

2 MS. ZIMNEY: Thank you, Ms. Goodson.

3 Q And, again, my apologies.

4 A Okay.

5 Q So that's Decision 16-06-046 that
6 you're citing to, correct?

7 A Correct.

8 Q And in that decision, for their
9 recommendation or their refusal to allow the
10 closure of the San Luis Obispo office, they
11 noted that the next closest SoCalGas branch
12 office was in Santa Maria, which is 30 miles
13 away; is that correct?

14 A Yes.

15 Q But didn't they also go on to state
16 that the San Luis Obispo office also didn't
17 meet SoCalGas's own criteria to authorize
18 payment locations or APLs within a three-mile
19 radius?

20 A One more time, please.

21 Q So in their decision to not allow
22 that closure, in addition to considering the
23 next CSO, the Commission also stated that
24 they were considering that there were -- but
25 it had not met SoCalGas's own criteria of
26 having two other APLs within the three-mile
27 radius?

28 MS. GOODSON: Ms. Zimney, do you want

1 to point Mr. Jones to where in that decision
2 you're referring to.

3 MS. ZIMNEY: Yes, I'd be happy to.
4 That is on page 43 of that decision. It's
5 the second large paragraph on that page.

6 A Yes. Yes.

7 Q I'm looking about halfway through
8 the paragraph. It says, "As noted, the San
9 Luis Obispo branch office currently does not
10 meet SoCalGas's own criteria regarding the
11 necessary number of APLs within a three-mile
12 radius."

13 A Yes, I see that.

14 Q So the Commission considered both
15 the nearest branch office and the number of
16 authorized payment locations within the
17 vicinity, correct?

18 A Yes. Specifically, yes. They may
19 have considered other information in making
20 this decision.

21 Q Okay.

22 A Which would -- could include the
23 fact that the San Luis Obispo branch, to my
24 knowledge, they had the highest percentage of
25 the number of -- what do they call it -- they
26 don't call them CSOs -- branch offices --

27 Q Right.

28 A -- who -- of people who try to go

1 there for nonpayment transactions but could
2 not make them because they only had a cashier
3 there.

4 Q Where do you --

5 A That is from my reading of TURN's
6 brief in that case.

7 Q Thank you. Are the APLs analogous
8 to PG&E NPCs, to your knowledge?

9 A Generally. I don't know the
10 specifics.

11 Q And generally, to your knowledge,
12 do you know whether the San Luis Obispo
13 branch office processes service orders?

14 A I don't.

15 Q You also pointed to the
16 Commission's rejection of SoCalGas's request
17 to close the Santa Barbara office in that
18 same decision, correct?

19 A Yes. That's correct.

20 Q And the Commission cited several
21 factors in that decision, correct?

22 A Yes.

23 Q One of those factors was the
24 nearest branch office, correct?

25 A Yes.

26 Q And another was that SoCalGas did
27 not have a technological solution for the
28 need to provide identity verification

1 documents in person; is that correct?

2 A Yes.

3 Q PG&E does have a technological
4 solution to provide identity verification
5 other than in person, correct?

6 A I don't know.

7 Q Do you know whether that can be
8 done online or over the phone?

9 A No.

10 Q My citation is page 33, line 22. I
11 apologize. It's the same citation. So the
12 end of that paragraph under Section (b).

13 ALJ LAU: Go off the record.

14 (Off the record.)

15 ALJ LAU: On the record.

16 BY MS. ZIMNEY:

17 Q You stated that the Commission
18 rejected SoCalGas' request to close these
19 offices on the basis of distance to the next
20 closest branch notwithstanding the
21 infrequency of transactions; is that correct?

22 A Would you point me to the right
23 reference, please.

24 Q So it's page 34, lines 19 to 22.
25 It says that the Commission rejected the
26 request on the basis --

27 A Oh, okay. Thank you.

28 Q -- of distance notwithstanding

1 infrequency of transactions, correct?

2 A Yes.

3 Q As a hypothetical, assume that a
4 CSO has no customers using it. Do you agree
5 that maintaining that CSO solely based on
6 distance to the next CSO would be not
7 cost-effective?

8 A Yes.

9 Q And on -- just a moment. I can
10 move on. And would you agree that as a
11 regulated utility that PG&E must consider
12 these costs that come from rates when
13 planning their customer service?

14 A Yes.

15 Q Now, turning to your analysis of
16 the surveys -- sorry. I'm looking for the --
17 it was on page 35 starting on line 2
18 regarding the sampling of the total
19 population.

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

21 (Off the record.)

22 ALJ LAU: On the record.

23 BY MS. ZIMNEY:

24 Q So we're looking at page 36, line
25 10. You criticized PG&E's survey stating
26 that it was not designed to include a random
27 sample of the total population of customers
28 who were within the vicinity of a targeted

1 CS0.

2 A Yes.

3 Q You stated that makes it difficult
4 to calculate the number of customers who are
5 in the pool of customers who would be
6 impacted by the proposed closures?

7 A Yes.

8 Q Would you agree that it stands to
9 reason that the customers who are in the CSOs
10 and actively using them would be most
11 impacted by their closure compared to those
12 who live nearby them but aren't actively
13 using them?

14 A Yes, to a point. I mean, we have
15 to consider the people who may use them but
16 aren't actually using them when the survey
17 was taken.

18 Q If they may use them but aren't
19 using them, they are able to use other
20 avenues for payment --

21 A Not if they don't need the service
22 now. Maybe they need it in three years.

23 ALJ LAU: Mr. Jones, you may want to
24 wait for the counsel to finish the question
25 because our court reporter is transcribing.

26 THE WITNESS: I apologize, your Honor.

27 ALJ LAU: Thank you.

28 ///

1 BY MS. ZIMNEY:

2 Q And then you had recommended that
3 the survey should be conducted by mail and
4 phone instead of only at CSOs; is that
5 correct?

6 A Yes.

7 Q Have you ever designed a survey
8 regarding customer service before?

9 A No.

10 Q Before you filed your testimony,
11 did you do any studies to compare the
12 accuracy or significance of responses to mail
13 and phone surveys versus in-person surveys?

14 A No. This recommendation is not
15 necessarily based on accuracy. It's based on
16 the universe of people who are being reached
17 in the survey.

18 Q Did you, before you filed your
19 system, do any studies to compare the
20 response rates to mail and phone surveys
21 versus in-person surveys?

22 A No.

23 Q Then you stated that the survey
24 should target a statistically valid
25 cross-section of customers, correct?

26 A Correct.

27 Q Do you have any data to show that
28 the -- doing the surveys in the CSOs was not

1 statistically valid?

2 A No.

3 Q Those are all the questions I have
4 for CSOs.

5 ALJ LAU: Did you -- okay.

6 Ms. Goodson, do you have any
7 redirect?

8 MS. GOODSON: I don't.

9 ALJ LAU: Ms. Zimney, do you have any
10 more questions?

11 MS. ZIMNEY: I don't. But I believe my
12 colleague, Mr. Ouborg, does on other matters.

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

14 (Off the record.)

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

16 Judge Lirag actually has a question
17 regarding CSOs.

18 EXAMINATION

19 BY ALJ LIRAG:

20 Q Just clarificatory stuff.

21 So on page 34, I'm only focusing on
22 the nonpayment transactions. So these are
23 reasons for your opposition to the closure --
24 to the proposed closure of CSOs. So can you
25 give specific examples of these nonpayment
26 transactions, reasons for opposing the
27 closure?

28 A I believe it's turning on and

1 turning off service. It's requesting payment
2 plans. I think it includes signing up for
3 medical baseline, things like that.

4 Q Did your reasoning take into
5 account the frequency of these, just the
6 nonpayment transactions?

7 A Yes. For example, the Commission
8 in the SoCalGas case wanted to leave the Palm
9 Springs open, and their reasoning was -- in
10 part, their reasoning was that it was 21
11 miles away from the next closest office, and
12 it had 1600 approximately NPTs.

13 Q But that's for that specific branch
14 office, right?

15 A Right. But that was part of the
16 reasoning for them to leave it -- declined to
17 close it.

18 Q So your reasoning applies that to
19 probably I would say all the proposed branch
20 offices. Like that --

21 A I mean, that's a data point.

22 Q Okay. Okay. So you're using that
23 as a data point applying it to the
24 branches --

25 A Correct.

26 Q -- not the branches -- the CSOs --

27 A CSOs.

28 Q -- that PG&E is proposing to close.

1 A Correct.

2 Q But there is no individual analysis
3 of each branch office; is that correct?

4 A Um --

5 Q Or you can extrapolate from the
6 data point.

7 A Yeah. And if you turn to page 39,
8 we do have some analysis for individual
9 branches.

10 Q That's all I wanted to know. Thank
11 you.

12 A Okay. Sure.

13 MS. GOODSON: Your Honor, if I may ask
14 sort of an unusual redirect question. I'm
15 afraid the record may be a little bit unclear
16 about the ultimate outcome in the SoCalGas
17 case. So I wanted to ask Mr. Jones a
18 follow-up question, if that's all right.

19 ALJ LIRAG: All right.

20 REDIRECT EXAMINATION

21 BY MS. GOODSON:

22 Q Mr. Jones, do you recall that Judge
23 Lirag asked you about -- asked you a question
24 about nonpayment transactions and you
25 discussed the Commission's analysis of the
26 Palm Springs branch office in the SoCalGas
27 case?

28 A Correct.

1 Q You said that the Commission
2 declined to close that office, in part,
3 because its concerning about the volume of
4 nonpayment transactions; is that what you
5 recall?

6 A Yes.

7 Q Is it also true that in that
8 decision the Comission at that time declined
9 to close it but created a process for
10 SoCalGas to come back to the Commission to
11 close that office once it had met certain
12 conditions?

13 A Yes.

14 Q Thank you.

15 ALJ LAU: All right. So now we're
16 ready to move on to the next topic. We have
17 Mr. Ouborg. Mr. Ouborg, are you ready to
18 begin your cross?

19 MR. OUBORG: Yes, your Honor. I am.

20 ALJ LAU: Please proceed.

21 CROSS-EXAMINATION

22 BY MR. OUBORG:

23 Q Afternoon, Mr. Jones.

24 A Good afternoon.

25 Q I'm Peter Ouborg, in-house counsel
26 at PG&E.

27 And I wanted to start this
28 afternoon by asking you some questions about

1 PG&E's gas distribution Overpressure
2 Protection Enhancements Program, or OPP
3 Program. And, in particular, I wanted to
4 focus on PG&E's proposal to install slam-shut
5 devices at its pilot-operated distribution
6 regulator stations to reduce the risk of
7 large overpressure events.

8 And if you could turn to your
9 testimony. This is Exhibit 276, page 17.

10 A I'm there.

11 Q Okay. And is it fair to say that
12 under recommendation, which I believe is up
13 on line 1 of that page, TURN is recommending
14 that the Commission eliminate the capital
15 expenditure forecast for this OPP Program?

16 A Yes.

17 Q And going down to line 5, is it
18 also fair to say that the reason for your
19 recommendation is that you believe the
20 existing configuration for regulator stations
21 with a regulator and a monitor is adequate to
22 protect against overpressure events and
23 there's no incremental benefit of the
24 slam-shut devices that PG&E is proposing --
25 or you don't believe PG&E has shown there's
26 any incremental benefit of the slam-shut
27 devices?

28 A I would characterize it slightly

1 differently. In terms of the common mode of
2 failure that the regulator and -- that the
3 regulator set has shown, I believe that PG&E
4 is following a program on the O&M side to
5 install filters that will prevent debris,
6 water, et cetera, sulphur from entering the
7 system and creating these failures.

8 Q Do you believe that those -- so
9 you're referring to the expense portion of
10 this -- of PG&E's proposal which involves
11 sulphur filtration and liquids filtration and
12 other debris filtration. Is it your opinion
13 that those kinds of measures could eliminate
14 common mode failure on these regulator
15 stations?

16 A At a one hundred percent rate, I'm
17 not sure.

18 Q So there's some probability that --

19 A I don't know what the probability
20 is.

21 Q But it's not zero?

22 A Perhaps.

23 Q So you referred to the common mode
24 failure a minute ago. Is it your
25 understanding that in normal operation of a
26 pipeline operated regulator station the
27 monitor would be -- would serve to protect
28 against overpressure events in the event of a

1 regulator failure?

2 A Yes.

3 Q However, both the monitor and the
4 regulator fail together. That's referred to
5 as the common mode failure; is that correct?

6 A If they both fail in the open
7 position.

8 Q Okay. And would you agree that if
9 that occurs there's no protection against an
10 overpressure event migrating downstream?

11 A In the absence of something like a
12 slam-shut, that is correct.

13 Q Thank you. Let's -- if you
14 could -- I believe I provided you with a copy
15 of Exhibit 41. Do you have that in front of
16 you? It was previously identified in this
17 proceeding as Exhibit 41.

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

19 (Off the record.)

20 ALJ LAU: Back on the record.

21 BY MR. OUBORG:

22 Q So just to recap, what this -- this
23 is a data request response by PG&E to a TURN
24 data request. And if you look at the answer
25 and under the red text in the answer -- are
26 you there?

27 A Yes. Okay.

28 Q And it summarizes what the data

1 request response is about. It says, "PG&E
2 has reviewed 32 large overpressure events
3 that occurred from 2016 to 2019 and has
4 prepared causal assessments of those events
5 to better understand the need for actions to
6 prevent recurrence."

7 And if you could look at the second
8 page of the data response, at the top,
9 there's a table.

10 Do you see that?

11 A Yes.

12 Q And in the third column of the
13 table, the heading of that column is Events
14 Attributable to Common Mode Failure at Pilot
15 Operated Stations, and underneath that, PG&E
16 lists -- I believe when you add those numbers
17 up, it's 14 events. Will you accept that as
18 correct?

19 A Including 2019, yes.

20 Q Yeah. And so -- do you agree that
21 the purpose of a slam-shut device -- well,
22 first off, I just want to reiterate. These
23 are 14 events that occurred in the last three
24 years or so related to common mode failure of
25 pilot-operated stations. And is it fair to
26 say that the purpose of slam-shut devices
27 would be to protect against situations like
28 this where there's a common mode failure --

1 one of the purposes?]

2 A It is a protection against the
3 effects of common mode failure. It does not
4 prevent the common mode failure.

5 Q So if there was a high pressure,
6 overpressure event, and the regulator and
7 monitor failed in the open position in the
8 common mode, then the slam shut, the probe to
9 the slam shut to be installed, would be to
10 then prevent that high pressure event
11 migrating downstream?

12 A Yes.

13 Q Does TURN think that some level of
14 overpressure event is acceptable?

15 A TURN believes that -- I believe
16 that PG&E is taking steps to prevent
17 overpressure events, including filters,
18 including a plethora of sort of management
19 organizational steps. And I think that those
20 steps should be allowed to manifest and see
21 the effect, their effectiveness.

22 Q But as you testified a short while
23 ago, all those measures, filtration and those
24 other measures, can't guarantee that there
25 won't be common mode failures; isn't that
26 correct?

27 A PG&E hasn't installed them yet, so
28 I'm not sure.

1 Q Are you aware, Mr. Jones, would you
2 agree that PG&E has already installed
3 slam-shut devices on its low pressure
4 systems?

5 A Yes.

6 Q And do you believe that the
7 installation of those devices was a
8 reasonable measure to protect against
9 overpressure events on the low pressure
10 systems?

11 A I think that -- I'm sorry. Can you
12 rephrase or repeat the question?

13 Q Sure. Do you believe that the
14 installation of those slam-shut devices on
15 our low-pressure systems was a reasonable
16 measure to protect against overpressure
17 events on the low-pressure systems?

18 A My understanding of the
19 low-pressure systems is that they -- that it
20 serves many customers. And I think in that
21 case it probably was reasonable.

22 Q Thank you.

23 I wanted to ask you next about the
24 Merrimack Valley incident. So I wanted you
25 to refer to Exhibit 40, which I distributed
26 earlier, which is the NTSB report on the
27 Merrimack Valley incident.

28 A Okay. I have it.

1 Q Do you agree, or does your reading
2 of this document confirm, that this event was
3 caused by a common mode failure of the
4 regulator station?

5 A I don't know that I saw the words
6 "common mode."

7 Q That it was a failure of
8 regulation, was it not?

9 A Yes.

10 Q Do you agree that this event was
11 unrelated to the fact that the system had
12 cast iron pipe?

13 A In terms of the impact of the
14 event, I'm not so sure. But the incident,
15 the part that created the problem, I would
16 agree with that.

17 Q They could have been replacing a
18 steel pipe or a plastic pipe?

19 A In terms of causing the event,
20 correct.

21 Q Do you also agree that the event
22 was not caused by the fact this was a
23 low-pressure systems?

24 A Correct.

25 Q Do you agree that had this utility
26 had a slam -- installed a slam-shut device
27 below its regulator station, it could have
28 prevented this incident?

1 A I don't know that personally. But
2 I do know that the -- one of the
3 recommendations, until Columbia Gas and the
4 Commonwealth of Massachusetts improved their
5 management of change, was to place slam shuts
6 onto the asset as a temporary measure.

7 MR. OUBORG: Okay. Could we go off the
8 record for a minute?

9 ALJ LAU: Off the record.

10 (Off the record.)

11 ALJ LAU: On the record.

12 BY MR. OUBORG:

13 Q Mr. Jones, in a follow-up to the
14 answer you just gave about Columbia Gas
15 installing slam shuts, or planning to, on its
16 low-pressure systems, a follow-up from the
17 event, could you take a look at PG&E's
18 rebuttal testimony, if you have that in front
19 of you?

20 ALJ LAU: Is that PG&E-17?

21 MR. OUBORG: Yes. It is Hearing
22 Exhibit 15, I believe, your Honor, and
23 page 5-21.

24 ALJ LAU: Off the record.

25 (Off the record.)

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

27 Mr. Ouborg, can you point us to
28 where we are looking at again?

1 MR. OUBORG: Yes. It is Hearing
2 Exhibit 15, which is PG&E's rebuttal
3 testimony, formerly known as PG&E-17,
4 page 5-21, and I would like to refer the
5 witness to line 15.

6 Q And there, Mr. Jones, it says: In
7 the recent safety management system plan,
8 communicated by my source, Columbia Gas, to
9 National Transportation Safety Board,
10 following the Merrimack Valley incident, the
11 company includes adding --

12 A I'm sorry. I don't see what you
13 are reading there. I must have the wrong
14 copy.

15 ALJ LAU: Off the record.

16 (Off the record.)

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

18 BY MR. OUBORG:

19 Q Mr. Jones, did you have a chance to
20 read lines 15 through 20 of page 5-20 of 21
21 of PG&E's rebuttal testimony?

22 A Yes.

23 Q And I merely wanted to ask if that
24 confirms your earlier answer that Columbia
25 Gas is -- now has a plan to install
26 overpressure protection devices as one of its
27 follow-up actions after this incident?

28 A I don't believe that is the

1 characterization that is in the -- in the
2 report.

3 Q This doesn't refer to the report.
4 This is a subsequent implementation plan,
5 which is referenced in Footnote 68. So that
6 would not be in the report.

7 A I thought you were referencing an
8 earlier answer I gave from the report?

9 Q No. I think I asked you whether a
10 slam-shut device could have prevented the
11 Merrimack Valley incident. I think you
12 said it could have, or you weren't sure.
13 Then you said you knew the company was
14 considering adding those. I thought that is
15 what your answer said. I may have
16 misunderstood you.

17 A That is not what I was trying to
18 say. The response that I gave in my opinion
19 was that these are recommendations from the
20 NTSB, which is to include -- install slam
21 shuts while they are in this process of
22 recovering from this incident in managing
23 their change.

24 Q Okay. Thank you. Let's turn back
25 to the Exhibit 40, if you would. And I
26 wanted you to look at page 7 of that.

27 A Sure.

28 MS. GOODSON: Mr. Ouborg, is that

1 page 7 of the final report?

2 MR. OUBORG: Yes.

3 MS. GOODSON: Thank you.

4 BY MR. OUBORG:

5 Q The top of the page says,
6 "Recommendations." Are you there, Mr. Jones?

7 A Yes.

8 Q If you look down at the
9 recommendations to NiSource, Inc., the third
10 recommendation states: Apply management of
11 change process to all changes to adequately
12 identify system threats that could result in
13 a common mode failure. Do you see that?

14 A Yes.

15 Q And isn't the intent of that
16 regulation what PG&E has done with its
17 proposal here? In other words, by tracking
18 OP failures due to the common mode, PG&E has
19 identified the risk of common mode failure
20 that seems to continue on its system, and has
21 proposed a solution to prevent the
22 eventuality of a large pressure spike, if
23 there is a common mode failure?

24 A No. I wouldn't agree with that.

25 This third paragraph here talks
26 about taking steps to reduce the actual
27 failure itself, and not to protect after the
28 failure happens, which is what the slam shut

1 does.

2 Q But wouldn't you agree that, based
3 on the causal valuations PG&E has done with
4 its overpressure events, it has identified
5 causes of these common mode failures?

6 A Including debris, sulfur, water, et
7 cetera, yes.

8 Q And given that, although PG&E can
9 do certain things, like install filtration,
10 they could still be a residual threat for the
11 residual risk of common mode failure?

12 A It is possible. I don't know that.
13 I also think that PG&E hasn't installed these
14 things yet, so we don't know.

15 Q For example, if the failure or the
16 failure regulation caused Merrimack Valley
17 incident was not due to debris, or anything
18 like that, right?

19 A It was due to an inexperienced
20 engineer who created a plan based on not
21 looking at diagrams. It was due to the fact
22 that in Massachusetts you don't need to have
23 a professional engineer review drawings
24 before they are implemented. So there was a
25 large-scale systemic failure that I would
26 hope PG&E is -- is not similar in that
27 regard.

28 Q But there could be one-off causes

1 and events still that cause common mode
2 failure, right?

3 A There could be.

4 MR. OUBORG: All right. That is all
5 the questions I have on this topic,
6 Mr. Jones. I wanted to turn now to aviation.

7 Could we go off the record, your
8 Honor?

9 ALJ LAU: How about Ms. Goodson?

10 MR. OUBORG: Sorry, I apologize.

11 ALJ LAU: Ms. Goodson, do you have any
12 redirect on this topic?

13 MS. GOODSON: Thank you, your Honor. I
14 don't. Let's move on.

15 I'm going to just, while we are off
16 the record --

17 ALJ LAU: We are still on the record.

18 Off the record.

19 (Off the record.)

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

21 Mr. Ouborg.

22 MR. OUBORG: Thank you, your Honor.

23 Q Mr. Jones, I now want to turn to
24 your testimony that relates to PG&E's
25 purchase of the four heavy-lift Black Hawk
26 helicopters. First I would like to establish
27 at a high level what PG&E's proposal was, and
28 TURN's position in that proposal.

1 With respect to PG&E's proposal,
2 could you turn to PG&E's rebuttal testimony
3 Exhibit 68, page 2-11.

4 A I'm there.

5 Q And on line 29 of that page. It
6 says: PG&E purchased the helicopters to help
7 it prepare for and respond to fire hazards
8 and internal construction and restoration
9 activities. Owning heavy-lift helicopters
10 provide PG&E heavy-lift resource availability
11 and control for its restoration and
12 construction support during fire season, and
13 will provide additional helicopter resources
14 to the California Department of Forestry and
15 Fire Protection, CAL FIRE, for fire response.

16 Can you now turn to your testimony,
17 which I believe is Exhibit 276.

18 MR. OUBORG: Can we go off the record,
19 your Honor?

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

21 (Off the record.)

22 ALJ LAU: Back on the record.

23 BY MR. OUBORG:

24 Q Mr. Jones, I wanted to refer you to
25 page 41 of your testimony, line 7. Are you
26 there?

27 A Yes.

28 Q And there it states: TURN's

1 analysis demonstrates that PG&E has not
2 justified the additional cost of purchasing
3 and owning these helicopters. And the safety
4 and reliability benefits can be achieved very
5 substantially lower costs by executing
6 exclusive use contracts with heavy-lift
7 vendors to utilize heavy-lift helicopters, as
8 needed.

9 And what I wanted to ask you about
10 is your recommendation that PG&E rent
11 helicopters instead of owning them. In
12 the -- sorry. In the language we just read
13 from in your testimony, you refer to an
14 exclusive use contract. Is it your position
15 that under such an exclusive use contract
16 PG&E would have guaranteed access to
17 helicopters for power restoration during fire
18 emergencies?

19 A As per the contract, yes.

20 Q And do you agree to get that
21 guaranteed access PG&E would have to ensure
22 that CAL FIRE did not use those helicopters
23 under the vendors' Call When Needed, or CWN,
24 contract with CAL FIRE?

25 A Yes. Although, I believe that PG&E
26 has thus far provided helicopters under the
27 UC, at least in 2018, during fire conditions.

28 Q But if PG&E doesn't exercise its

1 exclusive use rights under that contract,
2 there might be a situation where the
3 helicopters are being used for firefighting
4 duty at the same time PG&E needs the
5 helicopters to restore service. What I'm
6 trying to say is the only way to prevent that
7 is to tell the vendor they can't provide
8 these helicopters to CAL FIRE and exercise
9 full exclusivity. That would be the only way
10 to prevent that scenario, wouldn't it?

11 A Yes.

12 Q Are you aware that PG&E has said in
13 its testimony that it will not block CAL
14 FIRE's access to helicopters that PG&E rents,
15 because PG&E does not want to deprive CAL
16 FIRE of helicopters that CAL FIRE may need to
17 fight fires?

18 A I'm aware of that, yes.

19 Q Okay. So given that position by
20 PG&E to not undermine CAL FIRE's firefighting
21 ability, do you agree then that exclusive use
22 contract will actually not provide PG&E the
23 guaranteed access to helicopters?

24 A If PG&E accesses, according to the
25 statements in the testimony, then yes, that
26 would be correct.

27 MR. OUBORG: I want to turn next to the
28 likelihood that the marketplace will add

1 additional helicopters to the California Call
2 When Needed fleet. Can you turn to your
3 testimony at page 46.

4 Can we go off the record, your
5 Honor?

6 ALJ LAU: Off the record.

7 (Off the record.)

8 ALJ LAU: On the record.

9 BY MR. OUBORG:

10 Q Mr. Jones, at page 47 of your
11 testimony, can you look at line 11? Tell me
12 when you are there.

13 A Okay. I'm there.

14 Q There you say: If wildfires
15 continue in frequency and intensity, to the
16 degree that they have the last few years, it
17 is likely that helicopter contractors in the
18 marketplace will adjust by adding more units
19 to their fleet. Do you see that?

20 A Yes.

21 Q Is it TURN's position that we
22 should wait for further catastrophic fires to
23 occur, and then if there is shortage of
24 helicopters rely on the marketplace to add
25 incremental firefighting resources?

26 A No. That is not my position.
27 My -- we have already had catastrophic fires.
28 And the testimony shows that because we have

1 this experience, it is likely that the market
2 will respond to this -- the situation that we
3 have already experienced.

4 Q Have you -- are you aware of how
5 many helicopters are in the California Call
6 When Needed fleet?

7 A I couldn't say with specificity.

8 Q Have you done any analysis or study
9 in preparing your testimony to determine what
10 the optimal number of helicopters would be in
11 the call when needed fleet?

12 A I haven't. But I do know that PG&E
13 itself did not confer with CAL FIRE when
14 taking the decision to purchase helicopters.

15 Q Mr. Jones, you have a background in
16 economics, don't you?

17 A Yes.

18 Q Do you believe that this is the
19 kind of situation where private companies
20 will accurately assess the need for resources
21 and provide them? And let me just explain
22 what I mean by that. Catastrophic fires,
23 would you agree with me, are low-probability,
24 high-consequence events?

25 A Recently, maybe not.

26 Q Okay. And -- but there is a high
27 degree of uncertainty, right, about the
28 future intensity and frequency of fires?

1 A From year to year, that is correct.
2 But I would say, you know, the State of
3 California is ramping up for large fires.
4 PG&E itself is ramping up for large fires.
5 It is something that PG&E is expecting.

6 Q But wouldn't a private -- a private
7 vendor has to cover the fixed costs of owning
8 a large and expensive capital item like a
9 helicopter; isn't that true?

10 A They do, and those costs are
11 deferred when there is fires.

12 Q So if they don't have ongoing
13 revenue to cover the fixed costs, perhaps in
14 years where there aren't large fires, that
15 really would drive them buying helicopters,
16 isn't it? There wouldn't be --

17 A There is --

18 Q Sorry, can I finish?

19 A I'm sorry.

20 Q Okay. They wouldn't react well to
21 the expectation of some future event that --
22 uncertain, and rely on that to cover their
23 costs. Would that be fair to say?

24 MS. TORRES: Objection. This calls for
25 speculation. I think we are getting a little
26 far afield from the witness's testimony. I
27 don't want him to feel like he has to
28 speculate on what may or may not motivate

1 certain, unknown helicopter vendors.

2 ALJ LAU: I'm going to overrule it,
3 because Mr. Jones is an expert, and we are
4 just asking for his opinion. If he doesn't
5 know, he doesn't have to -- he can just
6 answer he doesn't know.]

7 THE WITNESS: I am going to have to ask
8 you to rephrase or at least restate.

9 BY MR. OUBORG:

10 Q I am just trying to -- I am trying
11 to ask your opinion as to whether a private
12 helicopter vendor could reasonably rely on
13 revenues from uncertain future events like
14 large fires to justify owning a resource that
15 has day-in and day-out fixed unvariable costs
16 like a helicopter?

17 A I think there is a market for --
18 that supplies helicopters already. And they
19 are supplying those helicopters based on the
20 current climate, including, you know,
21 supplying to companies like PG&E for
22 construction, supplying to CAL FIRE for
23 fighting fires.

24 So we know that there's already
25 this market. The fact that the market -- the
26 fact that the -- one of the factors that
27 drives this market, which is fires, is
28 presumably increasing; based on recent

1 history, it's fair to assume that the market
2 will respond.

3 Q Are private vendors obligated to
4 ensure there are enough helicopters for
5 firefighting emergencies?

6 A No.

7 Q Would a private helicopter services
8 provider justify its helicopter purchase
9 based on the public benefits that that those
10 helicopters might confer in case of a large
11 fire? Is that a factor that they would
12 consider?

13 A I would assume that they would
14 consider the underlying cost of that public
15 benefit which is fighting fires.

16 Q But the public benefits of fighting
17 fires which could be large, I assume, those
18 don't accrue to the bottom line of the
19 private --

20 A No.

21 Q Do you think there should be no
22 proactive approach by PG&E or the Commission
23 to try and anticipate future worst-case
24 scenarios like catastrophic fires?

25 A Restate, please.

26 Q I am just asking, your approach
27 appears to be that the marketplace is
28 best-equipped to acquire helicopters in the

1 face of rising frequency of fires.

2 MS. TORRES: Objection. That misstates
3 the witness' testimony. He talks about
4 multitude of factors, including the private
5 market but also CAL FIRE's own procurement of
6 helicopters.

7 ALJ LAU: I will sustain that
8 objection.

9 If, Mr. Ouborg, you can lay a
10 foundation on where Mr. Jones' testimony
11 relates to your line of questioning.

12 BY MR. OUBORG:

13 Q Okay. Let me restate the question.

14 Do you think PG&E or the Commission
15 should have any concern or any role in
16 anticipating the need for resources like
17 helicopters for future catastrophic fires?

18 A I think in terms of anticipating, I
19 am going to return to the fact that I think
20 that --

21 ALJ LIRAG: Let's go off the record.

22 (Off the record.)

23 ALJ LIRAG: Let's go back on the
24 record.

25 THE WITNESS: My opinion is that PG&E
26 should give the private market a chance to
27 adjust to the new fire climate in California.

28 ///

1 BY MR. OUBORG:

2 Q Thank you. Next I want to discuss
3 the consequences to PG&E's customers of
4 unavailability of heavy-lift helicopters.
5 And I handed you a reference exhibit earlier.
6 This is an excerpt from the testimony of
7 Sumeet Singh.

8 ALJ LAU: Let's go off the record.
9 (Off the record.)

10 ALJ LAU: Back on the record.

11 Mr. Ouborg, can you identify the
12 reference exhibit that you --

13 MR. OUBORG: Yes, your Honor. I've
14 provided the witness with an excerpt from the
15 rebuttal -- PG&E's rebuttal testimony on
16 wildfire risk policy and overview. This was
17 originally PG&E-18. And I am -- I apologize
18 for not having the hearing exhibit number of
19 that.

20 ALJ LAU: It's a reference document, so
21 there is no exhibit number.

22 MR. OUBORG: Right. But I can't
23 identify the exhibit number of the testimony
24 it came from. Sorry.

25 ALJ LAU: Right.

26 ALJ LIRAG: Let's just use the
27 reference document and just point to which.
28 There's only a few pages in there.

1 MR. OUBORG: Right. Thank you, your
2 Honor.

3 Q So I wanted to refer you to
4 page 2A-30 of that reference exhibit. And on
5 page -- on line 7 rather, Answer 67, it
6 states:

7 When helicopters are needed
8 after an emergency event
9 such as a wildfire,
10 unavailability can cause
11 delays in restoration of
12 power to PG&E's customers.
13 Since these helicopters are
14 needed to carry heavy
15 loads, such as poles and
16 towers to repair electric
17 distribution in
18 transmission facilities,
19 unavailability of aircraft
20 could keep these
21 distribution and
22 transmission lines out of
23 service and potentially
24 delay restoration for a
25 large number of customers.
26 And it concludes with:
27 In addition, construction
28 projects on critical assets

1 may not be completed in a
2 timely manner but can pose
3 safety and reliability
4 risks to PG&E customers.

5 I am still laying a foundation for
6 my question.

7 I next want to refer you to PG&E's
8 rebuttal testimony again, Exhibit 68,
9 page 2-19.

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

11 (Off the record.)

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

13 BY MR. JONES:

14 Q Are you at that page, Mr. Jones?

15 A Two dash --

16 Q 2-19. And starting at line 10,
17 PG&E 10 and 11, PG&E describes four occasions
18 since 2011 where it was unable to access
19 heavy-lift helicopters. And I wanted to
20 refer you particularly to line 16 where it
21 states:

22 During the 2015 Butte Fire,
23 PG&E service restoration in
24 the affected area was
25 delayed a few days due to
26 unavailability of
27 heavy-lift helicopters, as
28 they were being used for

1 firefighting activities.

2 My question to you, Mr. Jones, is:
3 Do you think it's acceptable for PG&E to wait
4 for several days or a few days for a
5 heavy-lift helicopter to restore service
6 during an emergency?

7 A It's not acceptable. I would add,
8 though, that under an exclusive-use contract,
9 this is likely not to be the case.

10 Q But that, as we discussed earlier,
11 that would require PG&E to exercise its
12 exclusive-use rights to ensure its
13 availability, right?

14 A That's correct.

15 Q Given that -- I realize that you
16 don't think PG&E should be doing this, but
17 given that PG&E will not prevent CAL FIRE
18 under a rental agreement from having access,
19 we are just not going to do that, don't you
20 agree that we would still be exposed to this
21 scenario of not having access during -- to
22 restore service during an emergency?

23 I think you've said this before.
24 And if I've misstated it, tell me, but I
25 realize your position is we should exercise
26 the exclusive use and then we'd always have a
27 helicopter. We are not going to that. Our
28 testimony says we are not going to do that.

1 So we're going to be exposed to this
2 potential delay.

3 Let me ask this question: Do you
4 think that that's unreasonable of us to do
5 that and incur this exposure? Maybe that is
6 the question I should ask you.

7 I mean, since you said it wasn't
8 acceptable to delay restoration, it sounds
9 like what you're saying is it's not
10 reasonable or acceptable for PG&E under the
11 rental contract to let CAL FIRE use the
12 helicopters because we need to have them.

13 A I'm sorry. I think you're question
14 also presupposes that the market will not
15 have responded by providing additional
16 helicopters.

17 Q So you're saying there is no
18 probability that -- I mean we had 11 --
19 sorry, four instances since 2011 where we
20 couldn't access helicopters. Fortunately, in
21 three of the four we were able to get one.
22 The one I talked about a minute ago, we
23 couldn't get one right away. You're saying
24 that can occur in the future?

25 A It's an infrequent once-in-four
26 years.

27 Q Okay. Let's move on to
28 firefighting benefits of ownership. That is

1 something I wanted to talk to you about.

2 Do you agree that by bringing four
3 additional helicopters into California, PG&E
4 has increased the statewide CWN fleet by four
5 helicopters, three of which PG&E intends to
6 make available to CAL FIRE during the fire
7 season and under PG&E's CWN contract with CAL
8 FIRE?

9 MS. TORRES: Can you restate the
10 question? Are you saying you're increasing
11 the fleet by three helicopters or by four
12 helicopters?

13 BY MR. OUBORG:

14 Q All four are under CWN according to
15 testimony and I can refer the witness to
16 that, but we also say in the testimony we
17 would make three available at any one time to
18 CAL FIRE.

19 So do you agree that we are
20 increasing the CWN fleet by three helicopters
21 by our proposal?

22 A Yes. By decreasing the potential
23 demand for private helicopters.

24 Q Can you explain that?

25 A Well, if PG&E brings in three
26 helicopters and CAL FIRE hires those
27 helicopters, then there are -- then they are
28 not hiring helicopters from private

1 operators.

2 Q Do you agree that if in a large
3 fire emergency in PG&E's service territory
4 perhaps covering multiple fires burning
5 simultaneously like the 2017 North Bay Fires,
6 the CWN fleet may not have enough helicopters
7 for CAL FIRE's needs?

8 A It's possible.

9 Q If CAL FIRE did suffer a shortage
10 of CWN Hawk helicopters in a given fire, do
11 you agree that the extent of that fire might
12 be greater and the damages from it might be
13 greater as a result?

14 A Yes.

15 Q Mr. Jones, do you agree that one of
16 the -- that the kinds of damages that result
17 from wildfires include destruction of
18 structures like homes?

19 A Yes.

20 Q And do you also agree that damages
21 from fires include -- can include damage to
22 utility infrastructure like electric power
23 lines and above-ground gas facilities?

24 A Yes.

25 Q And of course tragically you agree
26 that one of the consequences of wildfires can
27 be loss of life?

28 A Yes.

1 Q Compared to PG&E's forecast for
2 \$5.7 million per year of additional costs
3 from ownership compared to renting
4 helicopters, could the damages from a
5 single-fire event be much, much higher than
6 that number?

7 A Yes.

8 Q If the Commission adopts TURN's
9 proposal to deny funding for the four
10 helicopters that PG&E has purchased, and as a
11 result PG&E releases or sells those
12 helicopters and returns to a rental model and
13 subsequently a fire occurs in PG&E's service
14 territory where CAL FIRE experiences a
15 shortage of helicopters, do you agree that
16 PG&E shouldn't be liable for any damages that
17 result from a shortage of the helicopters?

18 MS. TORRES: Objection. That is beyond
19 the scope of this witness' testimony.

20 ALJ LAU: Sustained. That calls for a
21 lot of speculation.

22 MR. OUBORG: I will move on, your
23 Honor.

24 ALJ LAU: Okay.

25 BY MR. OUBORG:

26 Q Next, Mr. Jones, I wanted to talk
27 about whether PG&E has any responsibility to
28 take steps to reduce wildfire risk and to

1 share resources with CAL FIRE. And what I
2 wanted do is refer to a document which I
3 provided to you yesterday. This is CPUC
4 Resolution ERSB-4. And this has not been
5 marked as an exhibit. It will be a reference
6 document. Let me know when you have the
7 document in front of you.

8 A Oh. Yes, I do.

9 Q For orientation, at the top of
10 page 1 of that document under the heading
11 "Resolution," it says that:

12 This resolution directs
13 investor-owned electric
14 utilities to take remedial
15 measures to reduce the
16 likelihood of fire started
17 by or threatening utility
18 facilities.

19 Do you see that?

20 A Which page is it?

21 Q On the very first page under the
22 heading "Resolution," there's a --

23 A Okay. Yes.

24 Q And further down in the summary, it
25 states that:

26 This resolution was in
27 response to a state of
28 emergency in 2014 declared

1 by Governor Brown, which
2 directed State officials to
3 take actions to mitigate
4 against conditions that
5 could result from a
6 drought.

7 That is the first sentence in the
8 summary. Do you see that?

9 A Yes.

10 Q So now I wanted to turn you to
11 page 9 of the document.

12 ALJ LAU: Mr. Ouborg, as a time check,
13 do you think you can finish in 15 minutes or
14 less?

15 MR. OUBORG: I may be able to, your
16 Honor.

17 ALJ LAU: Thank you.

18 BY MR. OUBORG:

19 Q And on page 9, about halfway down,
20 there's a paragraph beginning, "It is cognate
21 and germane." Do you see that?

22 A Yes.

23 Q I am just going to read a few lines
24 from that.

25 It is cognate and germane
26 to our regulation of the
27 utilities to acquire them
28 to further protect their

1 electric power lines and
2 poles, as discussed herein,
3 in order to prevent their
4 facilities from causing
5 wildfires and to protect
6 their transmission and
7 distribution facilities,
8 which are threatened by
9 wildfires.

10 It is essential so that
11 the people of California
12 can rely -- continue to
13 rely on the IOUs' critical
14 electric infrastructure for
15 the provision of safe and
16 reliable service.

17 In addition, the utilities
18 can help reduce the risk of
19 wildfires by coordinating
20 with CAL FIRE and engaging
21 certain forest management
22 efforts.

23 And finally I just wanted to turn
24 you to the Ordering Paragraphs. Can you go
25 there? That's page 14. And are you there?

26 A Yes.

27 Q And under Order and Ordering
28 Paragraph 3, it says:

1 Additionally,
2 investor-owned utilities
3 should examine and create
4 public/private partnerships
5 during the state of
6 emergency that they find
7 necessary to reduce the
8 likelihood of fires
9 associated with their
10 facilities or to mitigate
11 the impact of fires on
12 their facilities.

13 My question for you, Mr. Jones, is:
14 If instead of owning helicopters, PG&E adopts
15 an exclusive-use rental contract model, as
16 you recommend, and exercises its
17 exclusive-use rights under that contract
18 during a fire emergency to prevent CAL FIRE
19 from using the helicopters to fight fires,
20 wouldn't that approach be inconsistent with
21 the intent of this resolution that utilities
22 be required to take steps to protect their
23 assets and coordinate with CAL FIRE to
24 mitigate the impact on utility facilities?

25 MS. TORRES: Objection. That calls for
26 a legal conclusion to interpret a Commission
27 Resolution and then the Ordering Paragraph to
28 the Commission Resolution. The witness is

1 not an attorney. He's not testifying on this
2 resolution at all and I just believe it's (a)
3 calls for a legal conclusion and seems to be
4 beyond the scope of his testimony.

5 ALJ LAU: I am going to overrule it
6 because I -- just based on your opinion, you
7 can answer Mr. Ouborg's question, to the best
8 of your knowledge.

9 THE WITNESS: So I guess I am
10 struggling with the fact that in my opinion
11 anyways and the evidence I think shows that
12 PG&E itself hasn't done its due diligence in
13 examining and creating public partnerships
14 with CAL FIRE.

15 It's my understanding that PG&E
16 didn't even talk to CAL FIRE in preparation
17 for purchasing these helicopters.

18 BY MR. OUBORG:

19 Q So, Mr. Jones, my question isn't
20 about that. My question is assuming PG&E
21 does what you're asking us to do, we sell it;
22 we don't have the helicopters anymore; we are
23 not funded for them, and we move to a rental
24 model. So that is the premise of my
25 question.

26 Under that exclusive-use rental,
27 which you recommend, do you believe us
28 exercising our exclusive-use rights and

1 blocking CAL FIRE from having access to those
2 helicopters is consistent with the intent or
3 the spirit of this resolution, which appears
4 to require coordination and cooperation with
5 respect to resources that CAL FIRE has?

6 MS. TORRES: Objection. This assumes
7 facts that are not in evidence. PG&E has not
8 demonstrated that there are not other
9 call-when-needed helicopters that CAL FIRE
10 has access to. So by implying, as counsel
11 is, that PG&E would be -- if PG&E had an
12 exclusive-use contract, there would not be
13 any other helicopter resources available to
14 CAL FIRE, that's assuming facts that are not
15 in evidence.

16 ALJ LAU: We'll just use it as a
17 hypothetical.

18 How about, Mr. Ouborg, let's use a
19 hypothetical?

20 MR. OUBORG: Well, I can try and lay a
21 foundation to the question that is a little
22 different as well.

23 ALJ LAU: Okay.

24 BY MR. OUBORG:

25 Q I think earlier on -- well, let me
26 ask you another question. I'm not going to
27 ask you to remember what you said earlier.
28 If PG&E has an exclusive-use contract and

1 exercises its exclusive-use rights and tells
2 the vendor that CAL FIRE cannot have access
3 to these helicopters, has PG&E removed two
4 helicopters from the CWN fleet?

5 A In the short term, yes, but that
6 assumes that the market is not going to
7 respond by providing more helicopters.

8 Q And let's be "short term" then. So
9 you said, "Yes, in the short term it does
10 remove."

11 If there's a fire where CAL FIRE
12 needs the helicopters, it now has two fewer
13 to draw on, would PG&E's action in removing
14 those from the pool be consistent with the
15 spirit of this resolution?

16 A I don't know.

17 Q Okay. Thank you. I've got a final
18 line of questions which I think is going to
19 be like five minutes.

20 ALJ LAU: Okay. Please proceed.

21 BY MR. OUBORG:

22 Q So, the last thing I wanted to talk
23 about, Mr. Jones, is the way CAL FIRE uses
24 helicopters when it fights fires. And in
25 your testimony -- and can we go off the
26 record for one second?

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

28 (Off the record.)

1 ALJ LAU: On the record.

2 BY MR. OUBORG:

3 Q Mr. Jones, in the interest of time,
4 I can't find the reference, but I believe you
5 made a statement in your testimony that says
6 -- you're speaking about CAL FIRE's recent
7 acquisitions of helicopters and other
8 aircraft and you made the statement that:

9 CAL FIRE's new helicopters
10 will reduce the number of
11 helicopters CAL FIRE will
12 require to use from third
13 parties, given equivalent
14 demand conditions.

15 Do you remember that statement?

16 A Yes.

17 Q Okay. Thank you. Is it your
18 understanding, Mr. Jones, that CAL FIRE uses
19 its own aircraft to fight fires and also
20 draws on the call-when-needed fleet?

21 A Yes.

22 Q And are you familiar with the
23 extent to which CAL FIRE's relies -- CAL FIRE
24 relies on the CWN helicopters when it fights
25 fires and under which circumstances it uses
26 the call-when-needed helicopters?

27 A I don't have that information.

28 Q Could you refer to what is being

1 labeled Exhibit 280?

2 A I have it.

3 Q And this document, for the record,
4 is a fact sheet from CAL FIRE's website and
5 it's -- the label on the document is CAL FIRE
6 Commonly-Used Fire Terminology. Have you
7 reviewed this document, Mr. Jones?

8 A Yes.

9 Q I wanted to look at two of the
10 definitions in the document. The first one
11 is under the heading "Initial Attack and
12 Extended Attack."

13 Firstly, there's a definition for
14 "Initial Attack." It says:

15 Initial Attack means the
16 first attack on a fire.
17 The number of resources
18 sent on the first dispatch
19 to a wildfire depends on
20 the location of the fire,
21 the fuels in the area and
22 current weather conditions.
23 Municipal fire departments
24 would call this the first
25 alarm. Most fires are
26 caught within the first
27 burn period after the first
28 two hours. Therefore the

1 vast majority of the fires
2 CAL FIRE responds to are
3 considered Initial Attack
4 fires.

5 Do you see that?

6 A Yes.

7 Q And then under that there is a
8 definition of an Extended Attack Fire. It
9 says:

10 Extended Attack means that
11 the fire has burned beyond
12 the area or building of
13 origin and beyond the
14 Initial Attack phase and
15 additional resources are
16 called. If the fire cannot
17 be confined in the area or
18 building of origin, even
19 with the substantial
20 addition of resources and a
21 long-term resource
22 commitment and logistical
23 support will be required,
24 then it is considered a
25 Major Attack or a major
26 fire.

27 Do you see that?

28 A Yes.

1 Q And next I wanted to refer you to
2 the other cross-exhibit, which I believe is
3 282 -- 281. Sorry, yes. 281.

4 A Yes.

5 Q Right. So, is it your
6 understanding that in the case of an extended
7 attack fire as we just read about, CAL FIRE
8 returns its helicopters that it used for the
9 initial attack to base and if possible
10 replaces them with CWN aircraft?

11 A Subject to check, I would allow --
12 yeah, I would.

13 Q And so if I could refer you to the
14 Exhibit 281 which is -- it's an agreement
15 that if you look at the first page of the
16 exhibit, it's a cooperative agreement between
17 a number of federal agencies and CAL FIRE --

18 A I see.

19 Q -- who are involved in
20 firefighting. Would that be a fair
21 characterization? I could read the whole
22 page but I am trying to --

23 A Yes. I would agree with that.

24 Q And this -- it's your understanding
25 this document -- let me refer you to page 4,
26 "Purpose" and there it says that:

27 This contract, this
28 agreement, is to document

1 the commitment of the
2 agencies to improve
3 efficiency by facilitating
4 coordination and exchange
5 of personnel, equipment,
6 supplies, services and
7 information among the
8 agencies to this agreement.
9 Do you see that?

10	A Yes.
----	--------

11 Q Okay. So, on the next page, page
12 5, there's a list of the exhibits to the
13 agreement. And, in particular, Exhibit G is
14 entitled "Interagency Aircraft Utilization
15 Guidelines." Do you see that?

16	A Yes.
----	--------

17 Q And then I've attached just that
18 exhibit to this document and I wanted to turn
19 you to Exhibit G and in particular page G-4
20 of Exhibit G.]

21 | A Okay. I'm there.

22 Q Okay. And it says, "helicopters"
23 about two-thirds of the way down the page.

24	Do you see that?
----	------------------

25	A Yes.
----	--------

26 Q And it first talks under A about
27 initial attack and how the agencies would use
28 their resources for that, but what I wanted

1 to focus on is B, which talks about extended
2 attack/major incidents. And I'm just going
3 to read it because it's very short.

4 Under that, it states, "Request for
5 additional helicopters after initial attack
6 will be placed through established dispatch
7 channels. Because the initial attack
8 helicopter modules are so valuable on initial
9 attack, it's desirable to replace them with
10 CWN helicopters when such aircraft are
11 available and can meet the missions of the
12 incident. If an initial attack helicopter is
13 not being used for technical firefighting
14 purposes, it should be replaced with a CWN
15 helicopter and module whenever possible."

16 Do you agree that if Cal Fire
17 adhered to that guideline that Cal Fire would
18 return its helicopters back to base as soon
19 as possible in a large extended fire so those
20 helicopters would be available for further
21 initial attack?

22 A I'm sorry.

23 Q Yeah. Sorry. That -- yeah. Go
24 ahead.

25 A I thought you were finished. I'm
26 sorry.

27 Q That's fine.

28 A I would agree.

1 Q Would you also agree that given
2 this guideline, Cal Fire's new helicopters
3 did not lessen the need for CWN helicopters
4 for extended attack fires in California?

5 A That would make sense, yes.

6 MR. OUBORG: Your Honor, could I go off
7 the record for one minute.

8 ALJ LAU: Okay.

9 Off the record.

10 (Off the record.)

11 ALJ LAU: On the record.

12 BY MR. OUBORG:

13 Q I do have one more question for
14 you, Mr. Jones. This relates to your
15 qualifications.

16 I did look through your
17 qualifications, and do you agree that you
18 didn't list in your qualifications any
19 aviation industry background or experience?

20 A Yes. I agree with that.

21 Q And since you talk about a lot of
22 testimony you filed -- I'm not sure of the
23 topics -- do you have any expertise in
24 firefighting by utilities or firefighting in
25 general and how the resources are coordinated
26 for firefighting?

27 A No.

28 Q And do you have any expertise in

1 the way aircraft are used to fight fires?

2 A No.

3 MR. OUBORG: Thank you.

4 I have no further questions, your
5 Honor.

6 EXAMINATION

7 BY ALJ LAU:

8 Q I have a couple questions very
9 quickly. So, Mr. Jones, your response was
10 that the market will respond by providing
11 more private aircrafts given that there is
12 more catastrophic wildfires in the recent
13 history.

14 How did you come up with that
15 conclusion?

16 A It was based on the fact that --
17 the understanding that there would be more
18 demand in a higher -- high-fire climate and
19 includes the understanding that these types
20 of helicopters are becoming more available as
21 the U.S. Army surpluses them.

22 Q How did you con -- how did you
23 conclude that PG&E did not confer with Cal
24 Fire in determining whether to buy the
25 helicopters that PG&E is proposing?

26 A So that was a TURN interrogatory on
27 PG&E.

28 Q You mean data request?

1 A Sorry. Data request. I can't
2 recall offhand which data request it is, but
3 it is in my attachments.

4 ALJ LAU: Okay.

5 Judge Lirag.

6 ALJ LIRAG: (Shaking head.)

7 ALJ LAU: Ms. Torres.

8 MS. TORRES: I do have some redirect.

9 ALJ LAU: Yes. Do you need a couple of
10 minutes?

11 MS. TORRES: That would be great.

12 ALJ LAU: Off the record.

13 (Off the record.)

14 ALJ LIRAG: Let us go back on the
15 record for redirect.

16 MS. TORRES: Thank you, your Honor.

17 REDIRECT EXAMINATION

18 BY MS. TORRES:

19 Q Mr. Jones, when counsel for PG&E
20 asked you if the only way to guarantee
21 exclusive use of the helicopters under an
22 exclusive-use contract is to exercise
23 exclusivity rights, you agreed with him,
24 correct?

25 A Yes.

26 Q And so under the 2018 exclusive-use
27 contract, is it your understanding that PG&E
28 had a choice to execute the call-when-needed

1 stipulation?

2 A Yes.

3 Q Have you seen any evidence that Cal
4 Fire asked PG&E or the vendor to include that
5 call-when-needed stipulation?

6 A No.

7 Q Then you also discussed the private
8 market's availability to provide sufficient
9 resources and mentioned that the private
10 market could respond to recent high-fire
11 years by procuring more helicopters. I was
12 wondering is Cal Fire adjusting for recent
13 high-fire years by procuring more helicopters
14 as well?

15 A They are procuring replacement
16 helicopters that are higher capacity, more
17 capable helicopters.

18 Q By "higher capacity," what are you
19 referring to?

20 A I believe the capacity of the new
21 helicopters is around a thousand gallons, and
22 the old helicopters were around 380, if I
23 recall correctly.

24 Q Thank you. Do you know if Cal Fire
25 recently lowered it's call-when-needed hourly
26 rate it provides to helicopters it has a
27 contract with?

28 A Yeah. In my testimony, it shows

1 that it reduced it from in the \$9,000 range
2 to the \$6,000 range.

3 Q Thank you. Counsel from PG&E asked
4 you about the 2015 Butte Fire and discussed
5 how PG&E had to wait a few days to access a
6 helicopter. Do you know if in 2015 PG&E had
7 an exclusive-use contract for any
8 helicopters?

9 A I believe they did not.

10 Q Thank you. Regarding this
11 Cross-Exhibit 281, counsel for PG&E
12 referenced the fact that the initial attack
13 helicopters Cal Fire has are so valuable they
14 would be called back after the initial attack
15 and replaced with call-when-needed
16 helicopters.

17 Do you recall that?

18 A Right. Yes.

19 Q Do you know if Cal Fire has other
20 firefighting aircraft beyond the initial
21 attack helicopters?

22 A Yeah. They have a fleet of
23 fixed-wing aircraft.

24 Q Do you know what type of activities
25 those are used for?

26 A Not in particular. I would assume
27 that they are used for the extended use --
28 extended-fire conditions.

1 Q Do you know if they drop flame
2 retardant on fires?

3 A Oh. Yes, they do.

4 MS. TORRES: Thank you. That's all my
5 questions.

6 ALJ LIRAG: Any recross, Mr. Ouborg?

7 MR. OUBORG: I have one --

8 ALJ LIRAG: Go ahead.

9 RECROSS-EXAMINATION

10 BY MR. OUBORG:

11 Q Mr. Jones, your counsel asked you a
12 few minutes ago about whether Cal Fire
13 reduced its call-when-needed rates for
14 payment for usage of call-when-needed
15 aircraft.

16 Do you recall that?

17 A Yes.

18 Q And you stated that it had gone
19 down from \$9,000 to \$6,000?

20 A In the neighborhood of that, yes.

21 Q Is your basis for that that PG&E
22 forecast they would get \$9,000 an hour from
23 Cal Fire and ultimately secured a contract
24 which had \$6,000?

25 A Yes. I believe that's correct.

26 Q But you don't have any knowledge of
27 other call-when-needed rates charged by Cal
28 Fire for other -- or paid by Cal Fire for

1 other aircraft?

2 A I do not.

3 Q Thank you.

4 MR. OUBORG: That's all my questions,
5 your Honor.

6 ALJ LIRAG: Thank you. So let's
7 address the exhibits. I'll direct it to Ms.
8 Torres. Ms. Goodson is on the transcript a
9 lot already.

10 So Ms. Torres, is there a move to
11 admit Exhibits 276, 276-R, 276-C and 276-C-R
12 into the record.

13 MS. TORRES: Yes, your Honor.

14 ALJ LIRAG: Any objections?

15 (No response.)

16 ALJ LIRAG: Hearing none, Exhibits 276,
17 276-R, 276-C and 276-C-R are received into
18 the record.

19 (Exhibit Nos. 276, 276-R, 276-C and
20 276-C-R were received into
evidence.)

21 ALJ LIRAG: And then the same question
22 for 277, 278-C and 279.

23 MS. TORRES: Yes, your Honor. TURN
24 requests they be moved into the record.

25 ALJ LIRAG: Any objections?

26 (No response.)

27 ALJ LIRAG: Hearing none, Exhibits 277,
28 278-C and 279 are received into the record.

1 (Exhibit Nos. 277, 278-C and 279
2 were received into evidence.)

3 ALJ LIRAG: To Mr. Ouborg, is there a
4 move to admit Exhibits 280, 281 and 282 into
5 record?

6 MR. OUBORG: Yes, your Honor.

7 ALJ LIRAG: Any objections?

8 (No response.)

9 ALJ LIRAG: Hearing none, Exhibits 280,
10 281 and 282 are received into the record.

11 (Exhibit Nos. 280, 281 and 282 were
12 received into evidence.)

13 ALJ LIRAG: So let's excuse Mr. Jones.
14 Thank you very much.

15 THE WITNESS: Thank you, your Honor.

16 MS. TORRES: Your Honor, can I ask a
17 clarifying question?

18 ALJ LIRAG: Yes.

19 MS. TORRES: What 282 is?

20 ALJ LIRAG: Yes, 282 --

21 Let's go off the record. .

22 (Off the record.)

23 ALJ LIRAG: Let's go back on the
24 record.

25 Earlier Ms. Gandesbery and Ms.
26 Ramaiya weren't here, but we said that PG&E
27 had served the briefing outline, and we
28 directed parties to, as much as possible,

1 follow it. But you had something to clarify
2 about Mr. Reid?

3 MS. GANDESBERY: Yes, your Honor. I
4 wanted to let you know that I thought we were
5 able to accommodate everyone's changes, but
6 we were not able to accommodate Mr. Reid's
7 changes. He didn't want the lines of
8 business in the particular work categories to
9 be listed, and he did kind of high-level
10 headings without the traditional GRC briefing
11 outline. So I wasn't able to accommodate his
12 suggestions.

13 ALJ LIRAG: That's fine. At least it
14 accommodates 99 percent of the parties.

15 MS. GANDESBERY: I believe so.

16 ALJ LIRAG: So parties should try to
17 follow it. We won't not admit Mr. Reid's
18 opening brief, if he does not file it. So
19 we'll just see what he submits.

20 A question: Does PG&E typically
21 submit a comparison exhibit?

22 MS. GANDESBERY: Yes, we've been
23 working with the parties on the
24 joint-comparison exhibit.

25 ALJ LIRAG: So hopefully that can be
26 submitted along with the updated testimony,
27 if that's possible.

28 MS. GANDESBERY: On November 1?

1 ALJ LIRAG: Right.

2 MS. GANDESBERY: Yes, your Honor. We
3 can do that.

4 ALJ LIRAG: Also, this is probably more
5 to TURN and CAL PA. We'll figure it out
6 tomorrow, but start thinking about when you
7 think you can make a motion for transcript
8 corrections. Just let me know how much time
9 you'd need. And if possible, it might make
10 sense to coordinate and submit a joint one
11 for the intervenors. I mean, just explore
12 that possibility so there's less filings to
13 consider.

14 So also, I think this is Marianne's
15 last day. She won't be here for the end of
16 the hearing. So thank you, Marianne. Let's
17 have you say something on the record.

18 MS. DIVINA: Let's go off the
19 record.

20 ALJ LIRAG: All right. I think she
21 wanted to express thanks for folks thanking
22 her when she received her employee
23 recognition award; is that correct?

24 MS. DIVINA: Yes. Thank you.

25 ALJ LIRAG: See, that "yes" is enough
26 to get you on the record.

27 All right. One final thing -- well,
28 let's do it tomorrow. I'm talking about --

1 also think of if briefing schedule needs to
2 be moved in light of recent developments, but
3 I think it will depend on what happens with
4 regards to the possible hearings. One caveat
5 regarding that is we promised that any -- if
6 briefing schedule is it moved back by one to
7 two weeks, we can assure you -- at least,
8 Judge Lau and I can assure you that that will
9 not impact the overall schedule. We are able
10 to start working on the decision -- or at
11 least on the proposed decision right away.

12 So tomorrow we'll have Mr. Borden
13 and Ms. Dowdell, and then we'll address any
14 remaining matters. So if there's anything we
15 haven't addressed yet, please think of that
16 and bring it up. And also, everyone should
17 bring a calendar tomorrow because we're
18 probably going to look at dates tomorrow.

19 Yes, Ms. Goodson.

20 MS. GOODSON: Your Honor, could we go
21 off the record for a moment so that I can
22 confer with PG&E so I don't surprise them
23 with the next thing I'm going to say.

24 ALJ LIRAG: All right.

25 Let's go off the record.

26 (Off the record.)

27 ALJ LIRAG: Let's go back on the
28 record.

1 I'd also like to add that tomorrow
2 we also have Mr. Kerans, and I believe this
3 will be -- he's available for
4 cross-examination on his surrebuttal, which
5 we'll identify right now. I'll identify as
6 Exhibit 288 the surrebuttal testimony of Mike
7 Kerans on the Cross Bore Project. So he will
8 be here tomorrow.

9 Also, one final thing. Mr. Lipps'
10 name is spelled incorrectly prior to now. So
11 it's spelled L-I-P-P-S, and so previously it
12 had been misspelled. And so I instructed the
13 court reporters that there's no need to
14 change every single spelling that occurred in
15 today's hearing regarding Mr. Lipps. So it
16 will appear as a slightly different spelling.
17 I don't know what that is, but I'm saying
18 there's no need to correct that.

19 And also, I think because Marianne
20 spoke, her last name is Divina, D-I-V-I-N-A.
21 All right. So that concludes our hearing
22 today. Tomorrow it's our last day, and we
23 will do the "all rise" that was recommended
24 by Ms. Ramaiya and Ms. Gandesbery.

25 MS. GANDESBERY: Okay.

26 ALJ LIRAG: All right. Thank you.

27 We are adjourned until tomorrow at
28 9:30.

1 Off the record.

2 (Whereupon, at the hour of 3:11
3 p.m., this matter having been continued
4 to 9:30 a.m., October 18, 2019 at
San Francisco, California, the
Commission then adjourned.)

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
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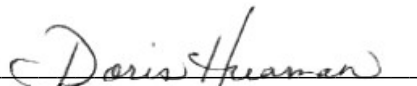
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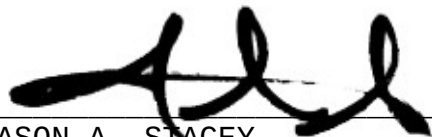
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A handwritten signature in black ink, appearing to read 'JAS STACEY', written over a horizontal line.

JASON A. STACEY
CSR NO. 14092


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KARLY POWERS
CSR NO. #13991

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<hr/> \$ <hr/>	17 2791:19 2807:10,18 2811:28 2823:9	237 2780:9	283 2802:7,11 2803:2,4
\$31 2800:19	170 2800:24	258 2803:14	284 2804:21,27
\$31.5 2800:19	187 2757:13	26 2755:1	284-R 2803:7,10 2804:21,28
\$5.7 2852:2	19 2799:20 2812:1 2815:24	267 2757:9,15,17	285 2803:12,15 2805:2, 7,10
\$6,000 2870:2 2871:19, 24	19-05-020 2773:25	269 2754:6 2779:4,7,9	286 2803:17,24,25 2804:1 2805:2,8,11
\$9,000 2870:1 2871:19, 22	192 2773:28	27 2755:24 2769:2	286-C 2803:27 2804:4, 19 2805:2,8,13
<hr/> (<hr/>	195 2773:28 2776:17	270 2754:6 2779:4,7,10	29 2836:5
(a) 2857:2	1:00 2801:17,27	271 2757:7 2779:13,16 2780:11,13,15	2A-30 2846:4
(b) 2809:10 2811:20 2815:12	1:10 2805:22,24	272 2756:6 2779:13 2780:11,13,16	<hr/> 3 <hr/>
<hr/> 1 <hr/>	1:14 2806:1	273 2779:13,22,24 2780:7	3 2758:27 2759:1,28 2791:11 2799:22 2803:21 2855:28
1 2758:24 2803:22 2806:28 2823:13 2853:10 2874:28	1:15 2806:10	274 2788:3,7 2789:20 2792:14,18,20 2793:8, 13	30 2801:11 2807:10,18 2812:12
10 2800:6,15 2809:10 2816:25 2847:16,17	<hr/> 2 <hr/>	274-C 2788:8,12,27 2792:14,19,20 2793:22	31 2791:11
103 2803:20	2 2758:25 2803:19,20 2816:17	275 2793:19	3104 2798:4
109 2803:14	2-11 2836:3	275-C 2793:22,23	32 2826:2
11 2795:25 2798:19 2800:6 2839:11 2847:17 2849:18	2-19 2847:9,16	276 2794:20 2798:15 2807:1,13 2823:9 2836:17 2872:11,16,19	320 2787:26
11:15 2792:23	20 2769:3 2799:26 2801:5 2831:20	276-C 2794:27 2795:2 2796:2,26 2872:11,17, 19	33 2791:16,18 2809:8 2815:10
11:49 2805:24	2011 2847:18 2849:19	276-C-R 2872:11,17	34 2772:5,14 2791:11, 16,18 2811:28 2815:24 2819:21
11th 2808:3	2014 2853:28	276-CR 2795:4,7 2796:2,27	35 2816:17
12th 2756:7	2015 2847:22 2870:4,6	276-R 2794:22,25 2872:11,17,19	36 2816:24
14 2800:10,12 2826:17, 23 2855:25	2016 2758:2 2762:7 2826:3	277 2795:11 2872:22,27 2873:1	380 2869:22
15 2830:22 2831:2,5,20 2854:13	2017 2757:12 2851:5	278-C 2795:13,18,21 2796:3,27 2872:22,28 2873:1	39 2821:7
16 2847:20	2018 2773:26 2797:9 2837:27 2868:26	279 2795:26 2798:15, 17,18 2872:22,28 2873:1	<hr/> 4 <hr/>
16-06-046 2812:5	2019 2762:11,12 2765:20 2783:23 2785:8 2795:25 2798:19 2826:3,19	280 2797:6 2861:1 2873:4,9,11	4 2755:23 2760:22 2789:27 2863:25
16-06-054 2757:24	2020 2762:9 2794:19 2802:9 2805:21	281 2797:12 2863:3,14 2870:11 2873:4,10,11	4-1 2791:19
16-12-024 2757:25	2023 2797:9		4-14 2790:21
16.5 2800:9	21 2772:5,10,12,14 2791:20 2820:10 2831:20		4-4 2790:3,6
1600 2820:12			

4-9 2790:18,21	85 2801:9	accounting 2758:27 2759:3,25 2760:2 2763:26	addressed 2773:16 2781:16 2876:15
40 2828:25 2832:25	<hr/> 9 <hr/>	accounts 2756:24 2766:3 2767:19	Addressing 2794:16
41 2825:15,17 2836:25	9 2791:22,25 2800:15 2809:10 2854:11,19	accrue 2843:18	adequate 2823:21
43 2813:4	90 2803:19	accuracy 2818:12,15	adequately 2833:11
46 2839:3	90013 2787:27	accurate 2800:2 2801:9	adhered 2865:17
47 2839:10	99 2874:14	accurately 2840:20	adjust 2839:18 2844:27
48 2799:28	<hr/> A <hr/>	achieved 2837:4	adjusting 2869:12
4th 2760:23 2787:26	A-U 2787:25	acquire 2843:28 2854:27	adjustment 2772:4
<hr/> 5 <hr/>	a.m. 2805:24	acquisitions 2860:7	adjustments 2769:9
5 2786:8 2799:23 2803:21 2823:17 2864:12	ability 2775:27 2838:21	acronyms 2755:19	administrative 2760:11
5-20 2831:20	above-ground 2851:23	Act 2761:5,12 2797:11	admission 2779:24 2780:8
5-21 2830:23 2831:4	absence 2825:11	action 2859:13	admit 2804:21 2805:1 2872:11 2873:4 2874:17
500 2787:27	accept 2804:18 2826:17	actions 2771:14 2826:5 2831:27 2854:3	admitted 2780:14
54 2800:4	acceptable 2760:17 2827:14 2848:3,7 2849:8,10	actively 2817:10,12	adopt 2760:28 2765:20
55 2790:4,6	access 2807:21,22 2808:15 2837:16,21 2838:14,23 2847:18 2848:18,21 2849:20 2858:1,10 2859:2 2870:5	activities 2836:9 2848:1 2870:24	adopted 2757:23
565 2809:5	accesses 2838:24	actual 2763:23 2764:15 2765:25 2766:11 2767:27 2768:1,10,12 2769:18 2770:26 2771:24,28 2772:2 2773:14 2833:26	adopts 2852:8 2856:14
<hr/> 6 <hr/>	accommodate 2874:5, 6,11	add 2786:4 2826:16 2838:28 2839:24 2848:7	advice 2768:24,25 2769:6,7,27 2770:4,9, 22,25 2771:3,4,25 2772:9,12,18 2774:26 2775:2,5 2776:24,26 2777:2,4,16,18,21,27
6 2785:8 2790:3,6 2793:15 2803:19	accommodates 2874:14	adding 2831:11 2832:14 2839:18	Advocates 2755:6 2756:12 2760:27 2761:4 2762:27 2774:16 2775:22 2787:14 2788:5,11 2791:3 2802:19,22
60 2800:13	accordance 2789:2,10	addition 2800:21 2812:22 2846:27 2855:17 2862:20	affect 2800:10
63 2803:22	account 2755:17,26 2756:13 2757:21,22 2758:5,15,18 2759:11, 17 2760:26,28 2761:4, 17,27 2762:1,20 2763:1,15 2765:21,22, 27,28 2766:6,9,10,13, 21,25 2767:22,27 2768:1,21 2769:19,25 2770:6,11,15 2771:14, 20 2773:9 2774:18 2778:5,10 2820:5	additional 2764:10 2799:8 2836:13 2837:2 2839:1 2849:15 2850:3 2852:2 2862:15 2865:5	affected 2847:24
67 2846:5		Additionally 2856:1	afforded 2785:5
68 2832:5 2836:3 2847:8		address 2780:25 2787:24,26 2798:2 2872:7 2876:13	afraid 2821:15
6th 2783:22,23 2784:12 2786:20			afternoon 2806:1,21 2822:23,24,28
<hr/> 7 <hr/>			agencies 2863:17 2864:2,8,27
7 2832:26 2833:1 2836:25 2846:5			agree 2760:5,9 2761:23
72 2790:5,7			
<hr/> 8 <hr/>			
8 2755:24 2791:22,23 2800:5 2803:21			

2763:18,20 2765:3 2816:4,10 2817:8 2825:8 2826:20 2828:2 2829:1,10,16,21,25 2833:24 2834:2 2837:20 2838:21 2840:23 2848:20 2850:2,19 2851:2,11, 15,20,25 2852:15 2863:23 2865:16,28 2866:1,17,20	23 2789:12,16 2790:15, 19,21,23 2791:5,7,17, 21,26 2792:3,6,11,16, 18,22,28 2793:21,26 2794:3,12,22,27 2795:4,9,13,15,18,23, 28 2796:11,24 2797:8, 14,18,22,27 2798:5 2801:3,7,12,14,26 2802:2,13,24 2803:2,6, 12,17,27 2804:13,24,27 2805:5,7,15 2806:4 2807:11,14,28 2808:5,7 2810:26,28 2811:5 2815:13,15 2816:20,22 2817:23,27 2819:5,9, 13,15,19 2821:19 2822:15,20 2825:18,20 2830:9,11,20,24,26 2831:15,17 2835:9,11, 17,20 2836:20,22 2839:6,8 2842:2 2844:7,21,23 2845:8, 10,20,25,26 2847:10,12 2852:20,24 2854:12,17 2857:5 2858:16,23 2859:20,27 2860:1 2866:8,11 2867:7 2868:4,6,7,9,12,14 2871:6,8 2872:6,14,16, 21,25,27 2873:3,7,9,13, 18,20,23 2874:13,16,25 2875:1,4,20,25 2876:24,27	answers 2756:18 2774:4 anticipate 2843:23 anticipating 2844:16, 18 anymore 2857:22 APLS 2812:18,26 2813:11 2814:7 apologies 2812:3 apologize 2815:11 2817:26 2835:10 2845:17 appears 2807:1 2843:27 2858:3 application 2770:8 2777:16 applied 2764:28 2765:4 2772:11 applies 2820:18 apply 2764:28 2771:27 2772:15 2777:19,20 2833:10 applying 2777:4 2820:23 approach 2843:22,26 2856:20 approval 2809:26 2811:9 approximately 2820:12 archival 2789:1 area 2847:24 2861:21 2862:12,17 argues 2755:7 arguing 2763:4 argument 2771:12 arising 2777:28 Army 2867:21 asks 2756:11 assess 2840:20 assessments 2826:4 asset 2830:6	assets 2846:28 2856:23 assign 2786:5 assume 2756:16 2816:3 2843:1,13,17 2870:26 assumes 2858:6 2859:6 assuming 2810:15 2811:2 2857:20 2858:14 assure 2876:7,8 attached 2864:17 attachment 2795:9 2806:28 attachments 2789:5 2795:19 2868:3 attack 2861:11,12,14, 15,16 2862:3,8,10,14, 25 2863:7,9 2864:27 2865:5,7,9,12,21 2866:4 2870:12,14,21 attack/major 2865:2 attempted 2782:22 attention 2809:15 attesting 2810:22 attorney 2857:1 Attributable 2826:14 Au 2787:12,14,22,25 2788:6 2789:20 2790:15 2791:8,21,27 2792:3,10,12 2793:6,18 August 2756:8 authority 2769:21,23 2776:4 authorize 2769:27 2812:17 authorized 2763:12 2813:16 availability 2836:10 2848:13 2869:8 avenues 2817:20 aviation 2796:6,11 2806:25 2835:6
agreed 2786:2 2793:27 2794:8 2868:23 agreement 2777:26 2781:7,10,13 2783:9 2784:2,6 2786:6 2796:8,9,14 2797:11 2804:11 2848:18 2863:14,16,28 2864:8, 13 agreements 2783:11, 13 agrees 2760:25 2761:17 ahead 2865:24 2871:8 AI 2764:9 aircraft 2796:16 2846:19 2860:8,19 2863:10 2864:14 2865:10 2867:1 2870:20,23 2871:15 2872:1 aircrafts 2867:11 alarm 2861:25 align 2765:20,21 aligning 2766:12 ALJ 2754:2,21 2755:2, 14,18 2757:2,4 2758:9 2762:6,11,12 2765:8, 10,13,15,17 2766:23 2767:11,12,24 2771:16, 18 2772:22,26,28 2773:20,22 2774:7,9 2776:21 2778:23,26 2779:1,6,12,16,19,23, 26 2780:13,18,20,22 2782:13 2783:5 2784:4, 9,22,24 2785:27 2786:24 2787:6,7,10, 17,20,28 2788:8,14,20,	Allis 2802:21 allowed 2827:20 allowing 2810:23 amendment 2781:6,13 2784:3 amendments 2790:10, 26 AMG 2794:18 analogous 2785:19 2814:7 analysis 2755:6 2816:15 2821:2,8,25 2837:1 2840:8 and/or 2774:16 Angeles 2787:27 annual 2769:7		

2866:19	basis 2815:19,26 2871:21	branch 2812:11 2813:9,15,23,26 2814:13,24 2815:20 2820:13,19 2821:3,26	buying 2841:15
award 2875:23	Bate 2756:28		<hr/> C <hr/>
aware 2756:12,23 2761:16,26 2762:1 2773:6,15 2775:12,16, 23 2777:8,13 2778:13 2809:24 2811:7,9 2828:1 2838:12,18 2840:4	Bate-156 2758:1 Bate-182 2759:7,9 Bate-187 2757:6,8 Bate-209 2762:15 Bates 2757:9 2773:28 2776:17 Bay 2851:5 Beatrix 2802:21 begin 2789:13 2806:15 2822:18 beginning 2759:9,10 2854:20 behalf 2788:4 2794:15 believes 2827:15 belongs 2782:5 benefit 2823:23,26 2843:15 benefits 2837:4 2843:9,16 2849:28 best-equipped 2843:28 bill 2808:27 bills 2809:3 binder 2773:27 bit 2821:15 Black 2835:25 block 2838:13 blockage 2781:28 blocking 2858:1 Board 2831:9 body 2807:9 Borden 2876:12 bore 2780:28 2782:17, 23 2785:17 bores 2782:7 2784:8 bottom 2758:6 2843:18	branches 2820:24,26 2821:9 break 2792:22 2793:1 2794:8 2801:6,14,25,26 2805:19,20 briefing 2806:6,7 2873:27 2874:10 2876:1,6 briefly 2786:17 2799:10,18 briefs 2786:21,27 2787:4 bring 2876:16,17 bringing 2850:2 brings 2850:25 broadened 2755:26 2760:28 2761:4 2763:10 broadening 2767:17 broader 2768:15,21 Brown 2854:1 Buchsbaum 2754:21, 23 2755:3,14,16,21 2757:5 2758:13 2762:6, 8,13 2765:6 2766:17 2767:2,7,8,14 2772:22, 24 2773:1,3,17,23 2774:10,12 2776:20,21, 25 2778:21 2779:12,15 2780:1,6 building 2862:12,18 bullet 2791:14 burn 2861:27 burned 2862:11 burning 2851:4 business 2787:24,26 2798:2 2805:17,18 2874:8 Butte 2847:22 2870:4 buy 2867:24	Cal 2755:6 2756:12 2760:27 2761:3 2762:27 2774:16 2775:21 2797:4 2802:21,26 2836:15 2837:22,24 2838:8,13, 15,16,20 2840:13 2842:22 2844:5 2848:17 2849:11 2850:6,7,18,26 2851:7, 9 2852:14 2853:1 2855:20 2856:18,23 2857:14,16 2858:1,5,9, 14 2859:2,11,23 2860:6,9,11,18,23 2861:4,5 2862:2 2863:7,17 2865:16,17 2866:2 2867:23 2869:3, 12,24 2870:13,19 2871:12,23,27,28 2875:5 calculate 2817:4 calculation 2800:8,16, 21,25 calculations 2800:12 calendar 2876:17 California 2773:6,26 2774:15 2787:27 2797:9 2798:4 2809:25 2810:2 2836:14 2839:1 2840:5 2841:3 2844:27 2850:3 2855:11 2866:4 call 2813:25,26 2837:23 2839:1 2840:5,11 2861:24 call-when-needed 2858:9 2860:20,26 2868:28 2869:5,25 2870:15 2871:13,14,27 called 2787:14 2797:24 2862:16 2870:14 calls 2841:24 2852:20 2856:25 2857:3 capable 2869:17 capacity 2869:16,18, 20
<hr/> B <hr/>			
back 2760:23 2765:15 2772:28 2774:9 2784:24 2786:28 2787:10 2791:7 2792:23 2793:1 2801:16,27 2802:2 2805:22 2806:4,9 2808:7 2810:18 2819:15 2822:10 2825:20 2830:26 2831:17 2832:24 2835:20 2836:22 2844:23 2845:10 2847:12 2865:18 2868:14 2870:14 2873:23 2876:6,27 background 2840:15 2866:19 balances 2769:5 balancing 2770:5,11, 15 banking 2807:22,23 2808:16 Barbara 2814:17 base 2769:9 2863:9 2865:18 based 2754:17 2763:8 2770:16,17,18 2771:28 2777:22 2816:5 2818:15 2834:2,20 2842:19,28 2843:9 2857:6 2867:16 baseline 2820:3 basically 2755:25 2760:24 2762:27 2764:1,26 2765:19 2772:6			

capital 2800:7,8,26 2823:14 2841:8	2832:23 2833:11	close 2776:15 2809:26 2811:10 2814:17 2815:18 2820:17,28 2822:2,9,11	Commonwealth 2830:4
capture 2772:8,13,20	changed 2770:17 2776:7		communicated 2831:8
care 2805:16,17 2807:7	channels 2865:7	closest 2812:11 2815:20 2820:11	companies 2840:19 2842:21
career 2807:4	chapter 2789:27 2790:2 2793:15	closure 2812:10,22 2817:11 2819:23,24,27	company 2774:16 2831:11 2832:13
carry 2846:14	characterization 2832:1 2863:21	closures 2811:24 2817:6	compare 2818:11,19
case 2761:25 2762:2 2763:8 2770:21 2771:12 2772:7,16 2773:6,7,27 2799:26 2802:10 2805:21 2814:6 2820:8 2821:17, 27 2828:21 2843:10 2848:9 2863:6	characterize 2823:28	cognate 2854:20,25	compared 2817:11 2852:1,3
cases 2771:6 2800:6	characterized 2761:2	colleague 2806:24 2819:12	comparison 2874:21
cash 2807:20 2808:12, 15,23	charged 2871:27	Columbia 2830:3,14 2831:8,24	completed 2847:1
cashier 2814:2	check 2760:6,8 2778:15 2854:12 2863:11	column 2826:12,13	completion 2782:23
cast 2829:12	choice 2868:28	Comission 2822:8	con 2867:22
catastrophic 2839:22, 27 2840:22 2843:24 2844:17 2867:12	Chris 2802:22	comments 2786:13	concern 2844:15
categorically 2809:23	circumstances 2860:25	commercial 2796:17	concerned 2777:3
categories 2874:8	citation 2815:10,11	commercially 2796:22	conclude 2867:23
caught 2861:26	cited 2814:20	Commission 2760:28 2768:5 2769:20,23,26 2770:4,7 2771:8 2774:17 2775:10,18,20, 25,26 2776:1,4,7,19 2785:15 2811:22 2812:23 2813:14 2814:20 2815:17,25 2820:7 2822:1,10 2823:14 2843:22 2844:14 2852:8 2856:26,28	concludes 2846:26
causal 2826:4 2834:3	citing 2812:6		conclusion 2856:26 2857:3 2867:15
caused 2763:25 2764:16 2781:24 2793:11 2829:3,22 2834:16	City 2780:25 2781:7,11 2782:3,12 2783:6,10,14 2784:7,27 2785:1,9,13, 25		conditions 2783:7,15 2784:26 2822:12 2837:27 2854:4 2860:14 2861:22 2870:28
causing 2829:19 2855:4	City's 2781:26	Commission's 2810:19 2814:16 2821:25	conducted 2818:3
caveat 2876:4	clarifications 2789:28 2801:22	commitment 2862:22 2864:1	confer 2801:18,19 2840:13 2843:10 2867:23 2876:22
CD 2788:27,28 2789:1, 4,7,11	clarificatory 2819:20	common 2806:6,7 2824:1,14,23 2825:5 2826:14,24,28 2827:3, 4,8,25 2829:3,6 2833:13,18,19,23 2834:5,11 2835:1	confidential 2788:9, 15,16,24,25 2789:7,8, 21 2793:21 2794:28 2795:5,14,16,19 2796:1,7,10,12,19,25 2803:28 2804:3,7,10, 16,19
centers 2808:20	clarified 2757:18		configuration 2823:20
cetera 2760:14,15 2771:21 2772:1 2824:6 2834:7	clarify 2765:18 2767:25 2771:19 2781:3 2782:20 2783:4 2785:27 2791:17 2793:8 2794:9 2874:1	Commonly 2797:5	confined 2862:17
chance 2767:11 2784:14 2786:13 2831:19 2844:26	clarifying 2873:17	Commonly-used 2861:6	confirm 2756:23 2829:2
change 2770:24 2771:9,21,25 2772:1,19 2794:9 2801:23 2830:5	clarity 2799:16		confirms 2831:24
	clear 2762:9 2764:13 2810:14,17		
	climate 2842:20 2844:27 2867:18		
	clock 2805:22		

conform 2800:16	correct 2754:13	2857:13	
conformed 2800:27	2755:13,28 2756:1,3, 14,24,25 2757:14	criteria 2812:17,25 2813:10	D
consequences 2845:3 2851:26	2761:7,19 2763:6 2764:2,3,17 2765:1 2767:3 2770:25 2775:10,14 2776:28 2777:12 2778:19 2791:28 2798:28 2807:24 2808:17 2809:3,4,18,21 2810:1, 10,16 2811:25 2812:6, 7,13 2813:17 2814:18, 19,21,24 2815:1,5,21 2816:1 2818:5,25,26 2820:25 2821:1,3,28 2825:5,12 2826:18 2827:26 2829:20,24 2838:26 2841:1 2848:14 2868:24 2871:25 2875:23	critical 2846:28 2855:13 criticized 2816:25 cross 2760:19 2766:15 2772:23 2780:28 2782:6,17,23 2784:8 2785:17 2792:10 2806:16 2822:18 cross-examination 2754:20,22 2783:22 2784:21 2785:11,21,22 2793:9 2797:1 2801:2, 23 2806:19 2822:21 cross-exhibit 2863:2 2870:11 cross-section 2818:25 crossed 2792:4 2806:14 CSO 2808:28 2811:23, 24 2812:23 2816:4,5,6 2817:1 CSOS 2806:26 2809:15 2813:26 2817:9 2818:4, 28 2819:4,17,24 2820:26,27 current 2766:9 2842:20 2861:22 customer 2794:18 2806:23 2807:6 2816:13 2818:8 customers 2807:21 2808:12,15,23 2809:2, 16 2816:4,27 2817:4,5, 9 2818:25 2828:20 2845:3 2846:12,25 2847:4 cut 2801:16 Cuts 2761:5,12 CWN 2837:23 2850:4,7, 14,20 2851:6,10 2859:4 2860:24 2863:10 2865:10,14 2866:3	damage 2851:21 damages 2851:12,16, 20 2852:4,16 dash 2847:15 data 2756:5,7,8,18 2760:21 2778:12 2788:21,24 2793:13 2796:12 2797:15 2803:13,19,20,21 2818:27 2820:21,23 2821:6 2825:23,24,28 2826:8 2867:28 2868:1, 2 date 2783:18 2784:11, 19,20 dated 2756:7 dates 2876:18 David 2802:23 day 2783:1 2875:15 day-in 2842:15 day-out 2842:15 days 2847:25 2848:4 2870:5 dealing 2782:28 dealt 2804:17 debris 2824:5,12 2834:6,17 decided 2783:5 decision 2757:23,24 2762:10,15 2763:9,12 2765:20 2770:4,8 2773:18,25 2774:14,20 2776:18 2784:10 2787:2 2812:5,8,21 2813:1,4,20 2814:18,21 2822:8 2840:14 2876:10,11 decisions 2778:15 declaration 2780:27 2782:20 2783:2 2786:3 declared 2853:28 declined 2820:16
continued 2761:18	correction 2791:22 2793:3 2803:18 corrections 2754:10 2790:1,8,10 2791:9,27 2801:21 2875:8 correctly 2761:3 2800:22 2869:23 cost 2782:7 2837:2 2843:14 cost-effective 2816:7 costs 2769:20 2800:8 2816:12 2837:5 2841:7, 10,13,23 2842:15 2852:2 counsel 2817:24 2822:25 2858:10 2868:19 2870:3,11 2871:11 couple 2867:8 2868:9 court 2758:11 2817:25 cover 2841:7,13,22 covering 2851:4 CPUC 2807:3 2853:3 create 2856:3 created 2822:9 2829:15 2834:20 creating 2824:7	conform 2800:16 conformed 2800:27 consequences 2845:3 2851:26 considered 2811:23 2813:14,19 2862:3,24 consistency 2766:28 consistent 2755:27 2761:10,14 2765:2 2766:2,27 2767:18,26 2768:6,7,9 2799:4,22 2804:10 2858:2 2859:14 construction 2836:8, 12 2842:22 2846:27 continue 2755:8 2756:16 2764:5 2790:9 2833:20 2839:15 2855:12 contract 2796:20 2837:14,15,19,24 2838:1,22 2848:8 2849:11 2850:7 2856:15,17 2858:12,28 2863:27 2868:22,27 2869:27 2870:7 2871:23 contractors 2839:17 contracts 2837:6 control 2791:24 2836:11 cooperation 2781:26 2858:4 cooperative 2797:10 2863:16 coordinate 2783:18 2786:4 2856:23 2875:10 coordinated 2866:25 coordinating 2855:19 coordination 2858:4 2864:4 copy 2825:14 2831:14 corner 2757:10	

2822:2,8	details 2767:21 2782:11	dispute 2774:14,22	2848:10 2858:25,27 2873:25
decrease 2772:7	determine 2840:9	distance 2811:23 2815:19,28 2816:6	easier 2758:11
decreasing 2850:22	determining 2867:24	distribute 2794:1	economics 2840:16
deductions 2755:11	developments 2786:26 2876:2	distributed 2802:5 2828:25	Edison 2767:26 2768:15,19 2773:6,18, 26 2774:14,16 2809:25 2810:2,3
deemed 2804:9	device 2826:21 2829:26 2832:10	distribution 2793:15 2794:17 2823:1,5 2846:17,21 2855:7	Edison's 2766:9,10,24 2768:9 2778:5
deferred 2785:17 2841:11	devices 2823:24,27 2826:26 2828:3,7,14 2831:26	DIVINA 2875:18,24	edits 2799:22
defined 2764:2	devises 2823:5	Division 2791:1	effect 2771:6 2827:21
definition 2758:5 2861:13 2862:8	diagrams 2834:21	document 2795:17 2802:8,27 2803:17,28 2807:26 2829:2 2845:20,27 2853:2,6,7, 10 2854:11 2861:3,5,7, 10 2863:25,28 2864:18	effectively 2808:27
definitions 2767:18 2861:10	differ 2766:26	documents 2794:4 2796:5,26 2798:13,21 2815:1	effectiveness 2827:21
degree 2839:16 2840:27	difference 2758:20 2771:24 2773:13 2777:8,9,18 2800:17	Douglas 2780:27 2783:8,20 2785:7,19	effects 2827:3
delay 2846:24 2849:2,8	differences 2755:10 2759:19 2763:1 2764:6, 23 2765:23,24 2767:20 2771:20 2777:5,14	Dowdell 2876:13	efficiency 2864:3
delayed 2787:2 2847:25	differently 2824:1	downstream 2825:10 2827:11	efforts 2855:22
delays 2846:11	difficult 2817:3	draw 2859:13	elective 2759:28 2760:14
demand 2850:23 2860:14 2867:18	diligence 2857:12	drawings 2834:23	electric 2793:15 2794:17 2846:16 2851:22 2853:13 2855:1,14
demonstrated 2858:8	direct 2754:3 2789:14, 18 2790:24 2793:6 2798:8,9 2806:12 2872:7	draws 2860:20	electrical 2759:2
demonstrates 2837:1	directed 2854:2 2873:28	drive 2841:15	eliminate 2823:14 2824:13
denied 2780:8,9	directs 2853:12	drives 2842:27	emergencies 2837:18 2843:5
deny 2852:9	disagree 2764:20,21	drop 2871:1	emergency 2846:8 2848:6,22 2851:3 2853:28 2856:6,18
Department 2836:14	discovery 2775:14,17 2776:14	drought 2854:6	employee 2875:22
departments 2861:23	discuss 2784:6 2786:26 2845:2	due 2786:21 2833:18 2834:17,19,21 2847:25 2857:12	encourage 2755:11
depend 2876:3	discussed 2821:25 2848:10 2855:2 2869:7 2870:4	duration 2772:15	end 2791:25 2811:20 2815:12 2875:15
depends 2861:19	discussion 2774:1,13	duty 2838:4	Energy 2791:1
depreciation 2802:8, 17,25	discussions 2781:14	<hr/> E <hr/>	engaging 2855:20
deprive 2838:15	dispatch 2861:18 2865:6	e-mail 2786:11	engineer 2834:20,23
describe 2788:28		earlier 2774:2 2778:10 2788:23 2828:26 2831:24 2832:8 2845:5	Enhancement 2790:20
describes 2847:17			Enhancements 2823:2
description 2800:2			
designed 2816:26 2818:7			
desirable 2865:9			
destruction 2851:17			
detailing 2758:20 2759:19			

ensure 2837:21 2843:4 2848:12	2789:18 2798:9 2806:13 2819:18 2821:20 2867:6 2868:17	2861:1 2863:14,16 2864:13,18,19,20 2872:19 2873:1,11 2874:21,24	experienced 2840:3
entering 2824:6			experiences 2852:14
entitled 2802:8 2803:18 2864:14	examine 2856:3	Exhibit-269 2755:2,4 2769:3	expert 2842:3
equipment 2864:5	examining 2857:13	Exhibit-271 2757:13	expertise 2754:17 2866:23,28
equivalent 2860:13	examples 2819:25	Exhibit-272 2760:23	explain 2788:14 2795:28 2799:10,13,18 2840:21 2850:24
eratta 2799:15	excerpt 2845:6,14	Exhibit-274 2793:5,16	explore 2875:11
errant 2800:5	exchange 2864:4	Exhibit-275 2793:7,17	exposed 2848:20 2849:1
errata 2795:24 2798:18 2799:8	exclusive 2837:6,14, 15 2838:1,21 2848:26 2868:21	Exhibit-276 2794:14, 24	exposure 2849:5
erroneously 2800:18	exclusive-use 2848:8, 12 2856:15,17 2857:26, 28 2858:12,28 2859:1 2868:22,26 2870:7	Exhibit-277 2795:9	express 2798:27 2799:3 2875:21
error 2779:21 2793:11	exclusivity 2838:9 2868:23	Exhibit-279 2795:23 2799:7	expressed 2754:16
ERSB-4 2853:4	excuse 2766:17 2807:22 2873:13	Exhibit-280 2797:4	extended 2861:12 2862:8,10 2863:6 2865:1,19 2866:4 2870:27
essence 2782:10	excused 2780:18	Exhibit-281 2797:8	extended-fire 2870:28
essential 2855:10	excuse 2766:17 2807:22 2873:13	Exhibit-282 2797:14	extent 2798:27 2799:3 2851:11 2860:23
essentially 2770:1	excused 2780:18	Exhibit-g 2797:8	extrapolate 2821:5
establish 2835:26	execute 2868:28	exhibits 2779:2,4,7,13, 16 2780:11,13 2788:1, 17 2792:18 2793:4 2794:14 2796:26 2797:1,3 2802:5 2804:17,21,27 2805:2,7 2864:12 2872:7,11,16, 27 2873:4,9	<hr/>
established 2783:13 2865:6	executing 2837:5	existing 2770:18 2784:2 2823:20	F
estimate 2801:9	exercise 2837:28 2838:8 2848:11,25 2868:22	expectation 2841:21	face 2844:1
estimated 2763:2	exercises 2856:16 2859:1	expecting 2841:5	facilitating 2864:3
estimating 2755:10	exercising 2857:28	expedited 2786:19	facilities 2846:18 2851:23 2853:18 2855:4,7 2856:10,12,24
evaluating 2811:24	exhibit 2754:6 2757:7 2779:9,10 2780:7,9,15, 16 2788:3,7,8,12,15,25, 26,27 2789:20,25 2792:14,20 2793:12,14, 19,23 2794:20,22,25,27 2795:2,4,7,11,13,18,21, 26 2796:2,3,27 2797:6, 12,16 2798:15 2799:27, 28 2802:7,11 2803:2,4, 7,10,12,14,15,17,24,25, 27 2804:1,4,19 2805:10,11,13,17 2807:1,12,13 2823:9 2825:15,17 2828:25 2830:22 2831:2 2832:25 2836:3,17 2845:5,12,18,21,23 2846:4 2847:8 2853:5	expenditure 2823:15	fact 2813:23 2829:11, 22 2834:21 2842:25,26 2844:19 2857:10 2861:4 2867:16 2870:12
event 2824:28 2825:10 2827:6,10,14 2829:2, 10,14,19,21 2830:17 2841:21 2846:8 2852:5		expense 2759:20 2768:13 2777:10 2824:9	factor 2843:11
events 2823:7,22 2824:28 2826:2,4,13, 17,23 2827:17 2828:9, 17 2834:4 2835:1 2840:24 2842:13		expenses 2758:21,22 2759:21 2763:24 2765:25 2766:11 2767:28 2768:2,11,12 2769:24 2800:26	factors 2814:21,23 2842:26 2844:4
eventuality 2833:22		expensive 2841:8	facts 2798:28 2858:7, 14
everyone's 2874:5		experience 2840:1 2866:19	fail 2825:4,6
evidence 2774:1 2779:9,11 2780:15,17, 26 2792:20 2803:4 2805:10,12,13 2857:11 2858:7,15 2869:3 2872:20 2873:1,11			failed 2827:7
examination 2754:3 2765:16 2771:17			

failure 2824:2,14,24 2825:1,5 2826:14,24,28 2827:3,4 2829:3,7 2833:13,19,23,27,28 2834:11,15,16,25 2835:2	finding 2765:4 2811:26	2859:4 2860:20 2870:22	2844:1
failures 2824:7 2827:25 2833:18 2834:5	fine 2761:15 2786:15 2811:7 2865:27 2874:13	flowed 2769:28	fresh 2801:15
fair 2764:12 2823:11,18 2826:25 2841:23 2843:1 2863:20	finish 2801:4 2817:24 2841:18 2854:13	focus 2823:4 2865:1	front 2754:6 2789:21 2825:15 2830:18 2853:7
fairly 2801:9	finished 2865:25	focusing 2819:21	fuels 2861:21
familiar 2762:21 2808:19 2810:19 2860:22	Finkelstein 2803:9	folks 2875:21	full 2758:4,7 2759:10 2787:23 2798:1 2838:9
fault 2781:21	fire 2797:4,5,10 2836:7, 12,15 2837:17,22,24,27 2838:8,16 2840:13 2842:22 2843:11 2844:27 2847:22 2848:17 2849:11 2850:6,8,18,26 2851:3, 9,10,11 2852:13,14 2853:1,16 2855:20 2856:18,23 2857:14,16 2858:1,5,9,14 2859:2, 11,23 2860:11,18,23 2861:5,6,16,20,23 2862:2,8,11,16,26 2863:7,17 2865:16,17, 19 2867:24 2869:4,12, 24 2870:4,13,19 2871:12,23,28	follow 2806:7 2874:1, 17	funded 2857:23
federal 2863:17	FIRE's 2838:14,20 2844:5 2851:7 2860:6, 9,23 2861:4 2866:2	follow-up 2821:18 2830:13,16 2831:27	funding 2852:9
feel 2841:27	firefighting 2838:3,20 2839:25 2843:5 2848:1 2849:28 2863:20 2865:13 2866:24,26 2870:20	footnote 2757:9,15,17 2790:7 2800:17,18,24 2832:5	future 2840:28 2841:21 2842:13 2843:23 2844:17 2849:24
fewer 2859:12	fires 2838:17 2839:22, 27 2840:22,28 2841:3, 4,11,14 2842:14,23,27 2843:15,17,24 2844:1, 17 2851:4,5,21 2856:8, 11,19 2859:24 2860:19, 25 2861:25 2862:1,4 2866:4 2867:1 2871:2	forecast 2755:11 2763:23 2770:23 2777:10 2782:6,9 2823:15 2852:1 2871:22	<hr/> G <hr/>
fight 2838:17 2856:19 2860:19 2867:1	Firstly 2861:13	forecasted 2758:22 2759:21 2764:15 2765:25 2766:11 2767:28 2768:10,13 2773:13	G-4 2864:19
fighting 2842:23 2843:15,16	fixed 2841:7,13 2842:15	forecasting 2769:18 2770:18	gallons 2869:21
fight 2859:24 2860:24	fixed-wing 2870:23	forest 2855:21	Gandesbery 2793:25, 26,27 2802:13,15 2804:25 2805:6 2873:25 2874:3,15,22, 28 2875:2
figure 2875:5	flame 2871:1	Forestry 2836:14	Garrett 2802:23
file 2769:6 2777:11,25 2783:17 2874:18	fleet 2839:2,19 2840:6, 11 2850:4,11,20 2851:6	form 2776:15	Garrick 2792:24 2794:15,23 2795:1,6, 10,20 2797:19,24 2798:3 2806:11 2810:14
filed 2770:25 2818:10, 18 2866:22		formatting 2800:1	gas 2789:27 2794:17 2806:24 2823:1 2830:3, 14 2831:8,25 2851:23
filing 2775:2,6 2777:16, 18,21,27 2785:25 2787:4		Fortunately 2849:20	gave 2830:14 2832:8, 18
filings 2875:12		forward 2767:9	general 2773:26 2802:9 2805:21 2866:25
filling 2774:26		found 2758:16	generally 2772:3 2808:21 2810:15 2814:9,11
filters 2824:5 2827:17		foundation 2844:10 2847:5 2858:21	germane 2854:21,25
filtration 2824:11,12 2827:23 2834:9		founded 2764:27	give 2762:18 2786:12 2787:24 2798:2 2819:25 2844:26
final 2800:13 2833:1 2859:17 2875:27		fourth 2800:4	giving 2810:18
finally 2763:12 2855:23		Francisco 2780:26 2781:1,8,11,21 2782:18,24 2783:7,10, 14 2784:27 2785:2,9	
find 2757:1 2773:19 2785:16,18 2856:6 2860:4		Francisco's 2785:13, 25	
		frequency 2820:5 2839:15 2840:28	

good 2754:24,26 2787:6 2796:24 2797:19,21 2802:25 2806:21 2822:24	handed 2845:5	2858:2,9 2859:3,4,7,12, 24 2860:7,9,11,24,26 2863:8 2864:22 2865:5, 10,18,20 2866:2,3 2867:20,25 2868:21 2869:11,13,16,17,21, 22,26 2870:8,13,16,21	hoping 2799:10
Goodson 2786:12,15 2787:5 2795:28 2796:4 2798:7,10 2799:12 2801:1,20 2802:28 2804:2,5,20,23 2805:3, 4 2806:12 2807:27 2808:2 2810:12 2811:28 2812:2,28 2819:6,8 2821:13,21 2832:28 2833:3 2835:9, 11,13 2872:8 2876:19, 20	handle 2809:16		hour 2805:24 2871:22
	handled 2809:21		hourly 2869:25
	Hang 2801:7		hours 2800:23 2861:28
	happened 2772:4,14 2777:22		hundred 2824:16
	happening 2766:1 2772:6 2775:24	helpful 2799:18 2810:21	hypothetical 2767:1,3, 9 2778:3 2816:3 2858:17,19
	happy 2813:3	high 2827:5,10 2835:27 2840:26	hypothetically 2766:8, 24 2768:14,21 2810:28
	Hawk 2835:25 2851:10	high-consequence 2840:24	
	hazards 2836:7		<hr/> I <hr/>
	head 2767:16 2801:17 2868:6	high-fire 2867:18 2869:10,13	i.e. 2794:24
Goodson's 2786:7	heading 2826:13 2853:10,22 2861:11	high-level 2874:9	identical 2756:13,25, 26 2757:22 2760:7,26 2766:16,17 2778:14,18
Governor 2854:1	headings 2874:10	higher 2852:5 2867:18 2869:16,18	identification 2788:7, 12 2793:19,23 2794:20, 25 2795:2,7,11,21,26 2797:6,12,16 2802:11 2803:10,15,25
grade 2789:2	hearing 2779:7 2784:11 2786:5,7,9,19 2792:18 2804:27 2805:7 2830:21 2831:1 2845:18 2872:16,27 2873:9 2875:16	highest 2813:24	identified 2781:22,23 2793:4,5 2796:6 2798:13 2804:6 2825:16 2833:19 2834:4
grant 2783:6 2796:25	hearings 2786:20 2804:15 2876:4	hires 2850:26	identify 2755:15 2788:1 2794:13 2797:2 2802:6 2803:6 2833:12 2845:11,23
granting 2784:27 2785:13	heavy 2846:14	hiring 2850:28	identity 2814:28 2815:4
GRC 2757:1,12 2758:2 2777:10 2782:6 2794:19 2805:20 2874:10	heavy-lift 2835:25 2836:9,10 2837:6,7 2845:4 2847:19,27 2848:5	historically 2811:22	imagine 2775:24
	helicopter 2836:13 2839:17 2841:9 2842:1, 12,16 2843:7,8 2848:5, 27 2858:13 2865:8,12, 15 2870:6	history 2843:1 2867:13	impact 2771:9 2829:13 2856:11,24 2876:9
great 2868:11	helicopters 2796:21 2835:26 2836:6,9 2837:3,7,11,17,22,26 2838:3,5,8,14,16,23 2839:1,24 2840:5,10,14 2841:15 2842:18,19 2843:4,10,28 2844:6,17 2845:4 2846:7,13 2847:19,27 2849:12,16, 20 2850:3,5,11,12,20, 23,26,27,28 2851:6,10 2852:4,10,12,15,17 2856:14,19 2857:17,22	homes 2851:18	impacted 2817:6,11
greater 2851:12,13		Honor 2754:1,19,24 2755:17,21 2765:7 2773:4,24 2774:12 2778:25 2779:15,17 2781:15 2782:12 2791:12 2792:7 2793:25,27 2796:4,13 2798:11 2802:15,28 2803:1 2804:5,23,26 2805:4,6 2806:18 2810:12 2817:26 2821:13 2822:19 2830:22 2835:8,13,22 2836:19 2839:5 2845:13 2846:2 2852:23 2854:16 2866:6 2867:5 2868:16 2872:5,13,23 2873:6, 15,16 2874:3 2875:2 2876:20	impeachment 2785:20
Greenwell 2802:21			implement 2772:10,18
guarantee 2827:24 2868:20			implementation 2832:4
guaranteed 2837:16, 21 2838:23			implemented 2834:24
guess 2771:12 2811:3 2857:9			implications 2755:9
guidance 2784:9,12			implying 2858:10
guideline 2865:17 2866:2			
Guidelines 2864:15			
<hr/> H <hr/>			
halfway 2813:7 2854:19		Honors 2799:12 2801:1	
hand 2787:13,21 2797:23,28		hope 2834:26	

impose 2783:15 2784:26	infrequency 2815:21 2816:1	involves 2824:10	Jones' 2844:10
improve 2864:2	infrequent 2849:25	involving 2773:12	judge 2765:8 2767:9 2771:16 2778:27 2819:16 2821:22 2868:5 2876:8
improved 2830:4	initial 2861:11,14,15 2862:3,14 2863:9 2864:27 2865:5,7,8,12, 21 2870:12,14,20	IOUS' 2855:13	judges 2774:24
in-house 2822:25	install 2823:4 2824:5 2831:25 2832:20 2834:9	iron 2829:12	judges' 2760:11
in-person 2808:27 2809:16,26 2818:13,21	installation 2828:7,14	IRS 2777:11,25	judgment 2799:5
incident 2828:24,27 2829:14,28 2831:10,27 2832:11,22 2834:17 2865:12	installed 2827:9,27 2828:2 2829:26 2834:13	issue 2761:26 2762:25 2773:7,8,16 2774:2	justified 2837:2
incidents 2865:2	installing 2830:15	issues 2776:9 2781:16, 23,27 2782:11 2783:11 2785:17	justify 2842:14 2843:8
include 2756:2 2781:6, 10,12,15 2813:22 2816:26 2832:20 2851:17,21 2869:4	instances 2849:19	item 2841:8	<hr/> K <hr/>
includes 2788:6 2804:7 2820:2 2831:11 2867:19	instituted 2761:10	items 2755:12 2758:15, 19 2759:18 2760:16 2776:10 2781:5,9 2783:25 2808:1	keeping 2755:7
including 2785:3 2826:19 2827:17,18 2834:6 2842:20 2844:4	insurance 2804:9,18	it's 2776:17 2780:5 2781:18 2782:16,18 2785:28 2802:17,25	kind 2840:19 2874:9
inconsistent 2856:20	intended 2791:13	<hr/> J <hr/>	kinds 2781:23,28 2782:1,2,11 2824:13 2851:16
increased 2850:4	intends 2850:5	J-O-N-E-S 2798:3	knew 2832:13
increasing 2842:28 2850:10,20	intensity 2839:15 2840:28	Jenny 2787:12,14,25 2788:6 2793:6,18	knowledge 2754:14 2799:1 2810:15,23 2811:4 2813:24 2814:8, 11 2857:8 2871:26
incremental 2823:23, 26 2839:25	intent 2833:15 2856:21 2858:2	Jobs 2761:5,12	<hr/> L <hr/>
incur 2849:5	inter 2780:26	joint 2786:1 2875:10	label 2861:5
incurred 2758:23 2759:22	interacting 2782:2	joint-comparison 2874:24	labeled 2861:1
indicating 2774:14	Interagency 2864:14	Jones 2792:24 2793:2 2794:15,24 2795:1,6, 10,20 2797:19,20,24 2798:3,6,12,25 2799:7, 17 2806:11,13,21 2810:18,21 2813:1 2817:23 2821:17,22 2822:23 2828:1 2830:13 2831:6,19 2833:6 2835:6,23 2836:24 2839:10 2840:15 2842:3 2847:13,14 2848:2 2851:15 2852:26 2856:13 2857:19 2859:23 2860:3,18 2861:7 2866:14 2867:9 2868:19 2871:11 2873:13	lack 2782:22
individual 2821:2,8	interest 2860:3		Lambert 2802:22
industry 2866:19	internal 2836:8		language 2757:19 2760:6 2762:20 2837:12
inexperienced 2834:19	interpret 2856:26		large 2813:5 2823:7 2826:2 2833:22 2841:3, 4,8,14 2842:14 2843:10,17 2846:25 2851:2 2865:19
information 2768:16 2774:25 2775:9,27 2776:6 2785:16 2788:18,21 2789:9 2796:5,10,23 2804:7,9, 15 2813:19 2860:27 2864:7	interpretation 2761:13 2774:15		large-scale 2834:25
infrastructure 2851:22 2855:14	interpretations 2761:6		last-minute 2799:14
	interrogatory 2867:26		late 2785:24
	interrupt 2767:14		Lau 2754:2 2755:2,14, 18 2757:2,4 2758:9 2762:11 2765:8,13,15, 17 2766:23 2767:11,24
	intervenor 2774:21		
	intervenor 2875:11		
	investor-owned 2853:13 2856:2		
	involved 2863:19		

2771:16 2772:22,26,28 2773:20,22 2774:7,9 2776:21 2778:23,26 2779:1,6,12,16,19,23, 26 2780:13,18,20,22 2782:13 2783:5 2784:4, 22,24 2787:7,10,17,20, 28 2788:8,14,20,23 2789:12,16 2790:15,19, 21,23 2791:5,7,17,21, 26 2792:3,6,11,16,18, 22 2794:12,22,27 2795:4,9,13,18,23,28 2796:11,24 2797:8,14, 18,22,27 2798:5 2801:3,7,26 2806:4 2807:11,14,28 2808:5,7 2810:26,28 2811:5 2815:13,15 2816:20,22 2817:23,27 2819:5,9, 13,15 2822:15,20 2825:18,20 2830:9,11, 20,24,26 2831:15,17 2835:9,11,17,20 2836:20,22 2839:6,8 2842:2 2844:7 2845:8, 10,20,25 2847:10,12 2852:20,24 2854:12,17 2857:5 2858:16,23 2859:20,27 2860:1 2866:8,11 2867:7 2868:4,7,9,12 2876:8	let's 2780:20,22 2786:3,4,12 2787:7 2802:2,13 2805:19,21 level 2766:4 2827:13 2835:27 liable 2852:16 life 2851:27 light 2761:11 2786:25 2790:11 2876:2 likelihood 2838:28 2853:16 2856:8 limited 2768:18 2773:14 2777:28 2783:3 lines 2755:23 2785:4 2791:11,19 2800:14 2809:10 2811:17,28 2815:24 2831:20 2846:22 2851:23 2854:23 2855:1 2874:7 Lipps 2780:27 2783:20 2785:19 2786:3 Lipps' 2783:9 2785:7 liquids 2824:11 Lirag 2754:21 2762:6, 12 2765:8,10 2767:12 2771:16,18 2778:27 2784:9 2785:27 2786:24 2787:6 2792:28 2793:21,26 2794:3 2795:15 2801:7, 12,14 2802:2,13,24 2803:2,6,12,17,27 2804:13,24,27 2805:5, 7,15 2819:16,19 2821:19,23 2844:21,23 2845:26 2868:5,6,14 2871:6,8 2872:6,14,16, 21,25,27 2873:3,7,9,13, 18,20,23 2874:13,16,25 2875:1,4,20,25 2876:24,27	litigated 2774:3 litigation 2761:28 live 2817:12 loads 2846:15 location 2861:20 locations 2812:18 2813:16 logistical 2862:22 long-term 2862:21 longest 2805:19 Los 2787:27 loss 2851:27 lot 2755:19 2852:21 2866:21 2872:9 low 2828:3,9 low-pressure 2828:15, 17,19 2829:23 2830:16 low-probability 2840:23 lower 2757:9 2787:20 2797:27 2837:5 lowered 2869:25 Luis 2812:10,16 2813:9,23 2814:12 lunch 2801:6,15,18,25 2805:18,20 2806:9	makes 2764:13 2770:4 2817:3 making 2813:19 management 2797:10 2827:18 2830:5 2831:7 2833:10 2855:21 managing 2832:22 mandatory 2758:26 2759:24 2760:13 manifest 2827:20 manner 2847:2 Maria 2812:12 Marianne 2875:16 Marianne's 2875:14 mark 2783:24 marked 2754:6 2756:6 2788:7,12 2793:19,23 2794:20,25 2795:2,7, 11,21,26 2797:6,12,16 2802:11 2803:10,15,25 2807:1 2853:5 market 2840:1 2842:17,25,27 2843:1 2844:5,26 2849:14 2859:6 2867:10 2869:10 market's 2869:8 marketplace 2838:28 2839:18,24 2843:27 Massachusetts 2830:4 2834:22 Master 2797:9 matter 2786:10 2806:25 matters 2807:3 2809:17 2819:12 2876:14 meaning 2783:20 means 2774:26 2861:15 2862:10 meant 2763:21 2764:14 measure 2828:8,16 2830:6 measurements
<hr/> M <hr/>			
law 2755:12 2758:26 2759:2,24 2760:1,11, 13,14 2763:26 2765:23 2768:3,13,19 2770:17, 23 2771:7,9,21,25 2772:1 2777:23 laws 2770:20 lay 2844:9 2858:20 laying 2847:5 lead 2762:3 leave 2820:8,16 left 2794:8 legal 2856:26 2857:3 lessen 2866:3 letter 2768:24,25 2769:7,8,27 2770:5,9, 22,25 2771:3,4,25 2772:9,13,18 2775:2 2776:24,27 2777:3,4,21	list 2786:11 2794:2 2809:17 2864:12 2866:18 listed 2802:20 2874:9 lists 2826:16 litigate 2755:8 2782:16	made 2781:20 2799:22, 24 2860:5,8 mail 2818:3,12,20 maintaining 2816:5 maintenance 2793:16 2796:15 major 2862:25 majority 2862:1 make 2754:11 2769:8 2790:1,27 2791:9 2798:14 2808:23 2814:2 2850:6,17 2866:5 2875:7,9	marked 2754:6 2756:6 2788:7,12 2793:19,23 2794:20,25 2795:2,7, 11,21,26 2797:6,12,16 2802:11 2803:10,15,25 2807:1 2853:5 market 2840:1 2842:17,25,27 2843:1 2844:5,26 2849:14 2859:6 2867:10 2869:10 market's 2869:8 marketplace 2838:28 2839:18,24 2843:27 Massachusetts 2830:4 2834:22 Master 2797:9 matter 2786:10 2806:25 matters 2807:3 2809:17 2819:12 2876:14 meaning 2783:20 means 2774:26 2861:15 2862:10 meant 2763:21 2764:14 measure 2828:8,16 2830:6 measurements

2791:24	misstates 2844:2	2788:15,17,25 2796:1, 25 2799:11 2804:3,19	2814:8
measures 2824:13 2827:23,24 2853:15	misunderstood 2832:16	nearby 2817:12	NPTS 2809:14 2820:12
mechanism 2763:22 2764:14 2769:14,15,17, 27 2770:2,9,12 2771:1, 3,13,26 2772:18	mitigate 2854:3 2856:10,24	nearest 2811:23 2813:15 2814:24	NTSB 2828:26 2832:20
medical 2820:3	mode 2824:1,14,23 2825:5 2826:14,24,28 2827:3,4,8,25 2829:3,6 2833:13,18,19,23 2834:5,11 2835:1	necessarily 2818:15	number 2770:27 2790:6 2813:11,15,25 2817:4 2840:10 2845:18,21,23 2846:25 2852:6 2860:10 2861:17 2863:17
meet 2812:17 2813:10 2865:11	model 2852:12 2856:15 2857:24	Ned 2802:21	numbering 2793:3,11 2794:9
members 2775:17,20, 21	module 2865:15	needed 2786:5,8,9 2801:20,22 2837:8,23 2839:2 2840:6,11 2846:7,14	numbers 2770:18,24 2782:26 2799:21 2800:10,11 2826:16
memo 2760:25,28 2761:17 2771:20	modules 2865:8	negotiation 2781:17	
memorandum 2755:17 2756:24 2757:21 2759:11,17 2761:24,27 2762:1,20, 28 2763:14 2765:21,22, 27,28 2766:3,6,9,10,13, 21,25 2767:19,21,27 2768:1,21 2769:19,24 2771:11,14 2773:9 2774:17	moment 2810:12 2816:9 2876:21	negotiations 2783:12	<hr/> O <hr/>
mentioned 2869:9	monitor 2823:21 2824:27 2825:3 2827:7	neighborhood 2808:20 2871:20	
Merrimack 2828:24,27 2831:10 2832:11 2834:16	morning 2754:25,26 2793:1 2797:20,21	net 2758:24 2759:23 2764:10	O&m 2800:27 2824:4
met 2812:25 2822:11	motion 2779:13 2780:25 2782:19 2783:2,6 2784:27 2785:13 2792:13 2875:7	Network 2794:16 2802:18	Obispo 2812:10,16 2813:9,23 2814:12
methods 2763:27	motivate 2841:28	Nisource 2833:9	objecting 2779:24 2780:10
microphone 2787:18	move 2779:3,13 2786:28 2787:3 2792:13 2802:14,16 2804:21 2805:1 2810:24 2816:10 2822:16 2835:14 2849:27 2852:22 2857:23 2872:10 2873:4	non-disclosure 2804:11	objection 2776:11 2779:27,28 2804:25 2841:24 2844:2,8 2852:18 2856:25 2858:6
migrating 2825:10 2827:11	moved 2779:8,18 2792:19 2872:24 2876:2,6	nondisclosure 2796:8	objections 2779:6 2792:16 2802:27 2804:24 2805:5 2872:14,25 2873:7
miles 2812:12 2820:11	multiple 2851:4	nonpayment 2809:11, 13 2810:8 2811:15,19, 21 2814:1 2819:22,25 2820:6 2821:24 2822:4	obligations 2782:18
million 2800:19 2852:2	multitude 2844:4	normal 2824:25	obtaining 2774:25
mind 2801:26 2810:17	Municipal 2861:23	North 2851:5	obligated 2843:3
minute 2824:24 2830:8 2849:22 2866:7		Nos 2872:19 2873:1,11	occasions 2847:17
minutes 2801:5,9,11 2854:13 2859:19 2868:10 2871:12	<hr/> N <hr/>	noted 2812:11 2813:8	occur 2839:23 2849:24
missed 2798:16	National 2831:9	notice 2776:1	occurred 2826:3,23
missions 2865:11	nature 2781:27	notification 2776:16 2786:10	occurs 2825:9 2852:13
misstated 2848:24		notify 2771:7 2776:18 2786:8	October 2795:25 2798:19 2808:3
		notwithstanding 2815:20,28	offhand 2868:2
		November 2783:22,23 2784:12 2785:1,5,8,28 2786:8 2874:28	office 2787:14 2788:5, 10 2791:2 2802:19 2812:10,12,16 2813:9, 15 2814:13,17,24
		NPC 2808:24,26	
		NPCS 2808:20 2809:6	

2820:11,14 2821:3,26 2822:2,11	order 2793:10 2855:3, 27	owning 2836:9 2837:3, 11 2841:7 2842:14 2856:14	payments 2808:23 PD 2757:19
offices 2806:23 2809:27 2810:7 2811:10,14 2813:26 2815:19 2820:20	Ordering 2855:24,27 2856:27	<hr/> P <hr/>	people 2813:28 2817:15 2818:16 2855:11
officials 2854:2	orders 2814:13	p.m. 2801:17 2805:25 2806:1	percent 2772:5,10,12 2800:9,10,12 2824:16 2874:14
Oh's 2776:11,23	organizational 2827:19	PA 2802:26 2875:5	percentage 2800:7,9 2813:24
once-in-four 2849:25	orientation 2853:9	package 2756:9	performance 2782:17
one-off 2834:28	origin 2862:13,18	pages 2774:6 2845:28	performed 2806:12
ongoing 2781:14 2841:12	original 2800:25 2809:9	paid 2763:2 2777:7 2871:28	period 2782:9 2861:27
online 2815:8	originally 2799:24 2845:17	Palm 2820:8 2821:26	permits 2782:1
onus 2782:22	OSA 2793:6	paragraph 2758:4,7 2808:11 2811:19,20 2813:5,8 2815:12 2833:25 2854:20 2855:28 2856:27	person 2782:28 2809:3 2815:1,5
OP 2833:18	OSA's 2793:28	paragraphs 2762:26 2855:24	person's 2776:14
open 2755:8 2820:9 2825:6 2827:7	Ouborg 2781:12 2782:14 2791:12 2792:6,7 2796:13 2801:13,19 2806:24 2819:12 2822:17,19,22, 25 2825:21 2830:7,12, 21,27 2831:1,18 2832:28 2833:2,4 2835:4,10,21,22 2836:18,23 2838:27 2839:9 2842:9 2844:9, 12 2845:1,11,13,22 2846:1 2850:13 2852:22,25 2854:12,15, 18 2857:18 2858:18,20, 24 2859:21 2860:2 2866:6,12 2867:3 2871:6,7,10 2872:4 2873:3,6	paraphrase 2755:25	personally 2810:22 2830:1
opening 2786:21,27 2787:4 2874:18		part 2765:12 2766:15 2776:26 2777:2 2781:16 2783:6 2820:10,15 2822:2 2829:15	personnel 2788:20,21, 24 2789:9 2864:5
operated 2824:26 2826:15		Partially 2761:8	personnel-identified 2788:18
operation 2824:25	Ouborg's 2857:7	parties 2775:12 2781:17 2782:5 2784:13 2799:8 2860:13 2873:28 2874:14,16,23	Peter 2806:24 2822:25
operational 2796:15	outcome 2821:16	partnerships 2856:4 2857:13	PG&E 2757:1,12 2760:25 2761:1,16 2764:28 2765:4,26 2766:22 2768:6 2769:5 2770:12 2775:16 2776:6 2778:10 2781:2, 3,8,11,20,21 2783:10, 14,16,23 2784:7,14 2785:1,2,5,21 2786:6,8 2788:19 2790:4,12 2796:6,11 2797:1 2799:9 2801:18 2802:19 2804:8,9 2806:5,7 2809:5 2814:8 2815:3 2816:11 2820:28 2822:26 2823:24,25 2824:3 2825:23 2826:1,15 2827:16,27 2828:2 2833:16,18 2834:3,8, 13,26 2836:6,10 2837:1,10,16,21,25,28 2838:4,12,14,15,20,22, 24 2840:12 2841:4,5
operations 2789:27	outline 2806:6,7 2873:27 2874:11	party 2786:18	
operators 2851:1	overpressure 2823:1, 7,22 2824:28 2825:10 2826:2 2827:6,14,17 2828:9,16 2831:26 2834:4	past 2756:20	
opinion 2754:16 2824:12 2832:18 2842:4,11 2844:25 2857:6,10	overrule 2842:2 2857:5	pay 2808:27 2809:2	
opinions 2799:4	overview 2845:16	paying 2807:21 2808:12,15	
OPP 2790:20 2823:2,15	ownership 2849:28 2852:3	payment 2808:10,20 2809:27 2810:7 2811:10,14 2812:18 2813:16 2817:20 2820:1 2871:14	
opportunity 2762:19 2774:5 2780:5 2783:16, 24 2785:6 2809:16			
opposed 2774:21			
opposing 2819:26			
opposition 2819:23			
optimal 2840:10			
option 2774:25			
ORA's 2764:22			
orally 2799:13			

2842:21 2843:22 2844:14,25 2847:4,17, 23 2848:3,11,16,17 2849:10 2850:3,5,25 2852:10,11,16,27 2856:14 2857:12,15,20 2858:7,11,28 2859:3 2867:23,25,27 2868:19, 27 2869:4 2870:3,5,6, 11 2871:21 2873:26 2874:20 2876:22	plethora 2827:18 point 2768:16 2770:24 2773:18 2790:15 2792:10 2813:1 2815:22 2817:14 2820:21,23 2821:6 2830:27 2845:27 pointed 2814:15 poles 2846:15 2855:2 policies 2763:28 policy 2759:1,5,27 2760:4 2845:16 pool 2817:5 2859:14 population 2816:19,27 portion 2783:8 2801:10 2824:9 pose 2847:2 position 2762:28 2782:4 2825:7 2827:7 2835:28 2837:14 2838:19 2839:21,26 2848:25 possibility 2875:12 possibly 2776:24 potential 2849:2 2850:22 potentially 2846:23 power 2837:17 2846:12 2851:22 2855:1 Practice 2789:2,10 prejudiced 2785:24 preliminary 2806:25 premarked 2793:14 premise 2857:24 preparation 2857:16 prepare 2836:7 prepared 2754:8 2788:3,9 2791:1 2793:17 2794:15,23,28 2795:6,10,20 2798:24 2803:8 2826:4 preparing 2840:9 presented 2793:9	pressure 2790:14,19 2827:5,10 2828:3,9 2833:22 presupposes 2849:14 prevent 2824:5 2826:6 2827:4,10,16 2833:21 2838:6,10 2848:17 2855:3 2856:18 prevented 2829:28 2832:10 previously 2788:7 2804:14 2807:4 2825:16 pricing 2796:17,22 primary 2785:12 principle 2764:27 private 2840:19 2841:6 2842:11 2843:3,7,19 2844:4,26 2850:23,28 2867:11 2869:7,9 proactive 2843:22 probability 2824:18,19 2849:18 probe 2827:8 problem 2829:15 procedural 2758:28 2759:4,26 2760:3 Procedurals 2794:18 Procedure 2789:3,11 procedures 2763:27 proceed 2754:2 2789:16 2798:7 2822:20 2859:20 proceeding 2775:13 2825:17 process 2768:25 2787:1 2822:9 2832:21 2833:11 processes 2814:13 procurement 2844:5 procuring 2869:11,13, 15 professional 2754:17 2799:5 2834:23	program 2785:18 2790:20 2823:2,3,15 2824:4 projects 2846:28 promised 2876:5 proposal 2764:22 2774:21 2777:27 2786:1,2 2790:14,17 2823:4 2824:10 2833:17 2835:27,28 2836:1 2850:21 2852:9 proposals 2786:1 propose 2766:12 2771:1 2783:25 2784:15 proposed 2781:13 2783:11,13 2784:3 2787:2 2817:6 2819:24 2820:19 2833:21 2876:11 proposing 2771:3 2784:16 2820:28 2823:24 2867:25 protect 2823:22 2824:27 2826:27 2828:8,16 2833:27 2854:28 2855:5 2856:22 protection 2790:14 2823:2 2825:9 2827:2 2831:26 2836:15 provide 2775:9,28 2808:27 2809:15 2810:7 2811:14 2814:28 2815:4 2836:10,13 2838:7,22 2840:21 2869:8 provided 2785:15,21 2788:18 2789:1,5 2790:12 2796:7,12 2804:8 2807:2 2809:17 2825:14 2837:26 2845:14 2853:3 provider 2796:14 2843:8 providing 2768:4 2776:6,16 2784:12 2796:15 2849:15 2859:7 2867:10
---	---	--	---

provision 2855:15	2844:11	reads 2758:17	recommend 2760:27 2856:16 2857:27
public 2789:7 2802:19 2843:9,14,16 2857:13	questions 2756:17 2762:22 2765:7,9,11 2767:13 2770:20 2773:5 2774:23 2775:1 2778:22 2779:21,27 2780:2,4,7 2792:8 2801:5 2819:3,10 2822:28 2835:5 2859:18 2867:4,8 2871:5 2872:4	ready 2762:23,24 2789:13 2792:3 2806:13 2822:16,17	recommendation 2761:9 2768:8 2769:11 2790:13 2812:9 2818:14 2823:12,19 2833:10 2837:10
public/private 2856:4		realize 2848:15,25	
purchase 2796:21 2835:25 2840:14 2843:8		reask 2810:27	
purchased 2836:6 2852:10		reason 2785:12 2811:22 2817:9 2823:18	recommendations 2830:3 2832:19 2833:6, 9
purchasing 2786:18 2837:2 2857:17	quick 2779:18	reasonable 2782:7,8 2828:8,15,21 2849:10	recommended 2761:4 2768:25,26 2818:2
purp 2775:4	quickly 2867:9	reasonableness 2769:22	recommending 2755:26 2766:28 2823:13
purpose 2771:15 2772:17 2775:2,5 2782:16,19 2783:2 2826:21,26 2863:26	quote 2756:27 2774:20	reasoning 2771:2 2820:4,9,10,16,18	record 2755:15 2757:2, 3,4,12,16 2759:8,15 2760:25 2763:16 2765:13,14,15 2772:13, 25,26,27,28 2773:20, 21,22 2774:7,8,9 2779:4,8,14 2780:8,11, 14,20,21,23 2782:20 2783:4 2784:22,23,25 2786:16 2787:8,9,10,22 2791:5,6,7 2792:14,19, 26,27,28 2794:10,11,12 2797:28 2801:28 2802:1,3,4,14,17 2803:3 2804:22,28 2805:2,8,23 2806:4 2808:5,6,7 2810:21 2815:13,14,15 2816:20, 21,22 2819:13,14,15 2821:15 2825:18,19,20 2830:8,9,10,11,24,25, 26 2831:15,16,17 2835:7,16,17,18,19,20 2836:18,20,21,22 2839:4,6,7,8 2844:21, 22,24 2845:8,9,10 2847:10,11,12 2859:26, 27,28 2860:1 2861:3 2866:7,9,10,11 2868:12,13,15 2872:12, 18,24,28 2873:5,10,21, 22,24 2875:17,19,26 2876:21,25,26,28
purposes 2760:19 2763:3 2775:9 2777:6 2827:1 2865:14	radius 2812:19,27 2813:12	reasons 2771:2 2819:23,26	
pursuant 2796:7	raise 2787:13 2797:22	rebuttal 2761:16,22 2770:13 2783:17,21 2785:6,10 2790:11 2830:18 2831:2,21 2836:2 2845:15 2847:8	
put 2767:9 2782:22 2799:14 2800:22	raised 2773:8 2774:2	recall 2775:3,4,8 2778:7 2779:20 2821:22 2822:5 2868:2 2869:23 2870:17 2871:16	
	Ramaiya 2873:26	recap 2825:22	
	ramping 2841:3,4	received 2774:23 2778:3 2779:9,10 2780:15,16 2781:1 2792:20 2803:3,4 2804:28 2805:8,10,11, 13 2809:25 2811:9 2872:17,19,28 2873:1, 10,11 2875:22	
	random 2816:26	recent 2762:14 2831:7 2842:28 2860:6 2867:12 2869:10,12 2876:2	
	range 2870:1,2	recently 2840:25 2869:25	
qualifications 2768:18 2792:1 2806:27 2866:15,17,18	rate 2763:8 2769:10 2771:5,11 2772:7,16 2773:26 2775:13 2802:9 2805:21 2824:16 2869:26	recess 2805:24 2806:9	
qualifiers 2768:20	ratemaking 2755:9 2763:3 2777:6	recognition 2875:23	recovering 2832:22
quantity 2796:17	rates 2816:12 2818:20 2871:13,27	recognize 2769:13	
question 2756:11,22 2760:22,24 2766:20 2767:6,16,25 2768:23 2770:3 2773:28 2774:11 2775:3,5,26 2776:3,22 2778:7 2779:18 2783:28 2804:2 2810:27 2811:1, 8 2817:24 2819:16 2821:14,18,23 2828:12 2844:13 2847:6 2848:2 2849:3,6,13 2850:10 2856:13 2857:7,19,20, 25 2858:21,26 2866:13 2872:21 2873:17 2874:20	reached 2818:16	recollection 2807:8	
questioning 2774:28 2776:13 2806:22	reading 2758:10 2814:5 2829:1 2831:13		

recross 2871:6	regulation 2829:8 2833:16 2834:16 2854:26	rent 2837:10	residual 2834:10,11
RECROSS- EXAMINATION 2773:2 2871:9	regulator 2823:6,20,21 2824:2,3,14,26 2825:1, 4 2827:6 2829:4,27	rental 2848:18 2849:11 2852:12 2856:15 2857:23,26	resolution 2810:20 2853:4,11,12,22,26 2856:21,27,28 2857:2 2858:3 2859:15
recurrence 2826:6	Reid 2874:2	renting 2852:3	resolve 2781:19 2782:5
red 2825:25	Reid's 2874:6,17	rents 2838:14	resource 2836:10 2842:14 2862:21
redirect 2819:7 2821:14,20 2835:12 2868:8,15,17	reiterate 2826:22	repair 2846:16	resources 2836:13 2839:25 2840:20 2844:16 2853:1 2858:5, 13 2861:17 2862:15,20 2864:28 2866:25 2869:9
redline 2794:22 2795:5,24 2798:19 2799:16 2803:7	rejected 2815:18,25	repeat 2774:10 2828:12	respect 2773:8 2774:17 2776:8 2836:1 2858:5
reduce 2823:6 2833:26 2852:28 2853:15 2855:18 2856:7 2860:10	rejection 2814:16	rephrasing 2776:22 2828:12 2842:8	respond 2767:6 2811:6 2836:7 2840:2 2843:2 2859:7 2867:10 2869:10
reduced 2870:1 2871:13	relate 2776:27	replace 2865:9	responded 2849:15
refer 2760:16,21 2762:18 2768:27 2828:25 2831:4 2832:3 2836:24 2837:13 2846:3 2847:7,20 2850:15 2853:2 2860:28 2863:1,13,25	related 2768:2 2776:22 2780:28 2783:12 2784:2 2792:8 2796:5 2804:8 2826:24	replaced 2865:14 2870:15	responds 2862:2
reference 2808:1 2811:27 2815:23 2845:5,12,20,27 2846:4 2853:5 2860:4	relates 2835:24 2844:11 2866:14	replacement 2869:15	response 2756:5,7 2761:3,9 2778:12,28 2779:28 2780:27 2781:2,4 2782:14 2785:22,23 2792:17 2797:11,15 2803:13,20, 22 2818:20 2825:23 2826:1,8 2832:18 2836:15 2853:27 2867:9 2872:15,26 2873:8
referenced 2832:5 2870:12	relating 2755:18 2768:24 2770:13 2777:5 2778:4 2785:16 2804:17	replacing 2829:17	responses 2756:18 2793:14 2803:13,18,19, 20,21,23 2810:25 2818:12
referencing 2832:7	relation 2783:9	reply 2787:4	responsibility 2782:10 2852:27
referred 2770:12 2824:23 2825:4	releases 2852:11	report 2770:19 2828:26 2832:2,3,6,8 2833:1	restate 2842:8 2843:25 2844:13 2850:9
referring 2773:27 2812:1 2813:2 2824:9 2869:19	reliability 2837:4 2847:3	reporter 2758:11 2817:25	restoration 2836:8,11 2837:17 2846:11,24 2847:23 2849:8
reflect 2761:20 2763:1, 5 2773:9	reliable 2855:16	reporting 2769:17 2771:13	restore 2838:5 2848:5, 22
reflected 2777:6	relies 2860:23,24	request 2756:9 2758:9 2760:11,22 2775:27 2793:14 2797:15 2803:14,19,20,22 2814:16 2815:18,26 2825:23,24 2826:1 2865:4 2867:28 2868:1, 2	
Reform 2794:16 2802:18	rely 2839:24 2841:22 2842:12 2855:12,13	requested 2775:18	
refusal 2812:9	relying 2760:10	requesting 2820:1	
regard 2784:7 2834:27	remaining 2876:14	requests 2872:24	
regulated 2816:11	remains 2793:13,16	require 2781:25 2848:11 2858:4 2860:12	
	remedial 2853:14	required 2777:17 2856:22 2862:23	
	remediation 2782:23	requirement 2769:10 2770:1	
	remember 2774:27 2775:1 2810:5 2811:11 2858:27 2860:15		
	remove 2859:10		
	removed 2800:5 2859:3		
	removing 2859:13		

result 2769:4 2800:20 2833:12 2851:13,16 2852:11,17 2854:5	safety 2787:14 2788:5, 10 2791:3 2831:7,9 2837:3 2847:3	Sempra's 2765:20,21 2766:26 2767:23,28 2768:11,17 2778:11	Sher's 2779:28
resulting 2755:10 2758:24 2759:23 2765:23	sample 2816:27	senior 2790:28	short 2827:22 2859:5, 8,9 2865:3
retardant 2871:2	sampling 2816:18	sense 2866:5 2875:10	shortage 2839:23 2851:9 2852:15,17
return 2777:7 2844:19 2865:18	San 2780:25 2781:1,8, 11,20 2782:18,24 2783:6,10,14 2784:27 2785:2,9,13,25 2812:10,16 2813:8,23 2814:12	sensitive 2796:16,22	shorter 2798:15
returns 2775:19 2852:12 2863:8	Sander's 2786:6	sentence 2755:7 2758:6,16 2759:10 2763:14,15 2764:13,19 2854:7	show 2767:4 2818:27
revenue 2758:25 2759:23 2764:10 2769:10 2770:1 2841:13	Sanders 2782:13,15 2783:27 2784:5,19 2786:17	sentences 2760:7	shown 2796:25 2823:25 2824:3
revenues 2842:13	Santa 2812:12 2814:17	separate 2758:15,19 2759:18 2785:28	shows 2839:28 2857:11 2869:28
review 2763:7 2769:22 2834:23	SCE 2756:3 2776:18 2809:25 2810:4 2811:9	series 2798:14 2805:20	shut 2827:8,9 2833:28
reviewed 2784:17 2826:2 2861:7	SCE's 2766:16,20 2767:21 2773:16	serve 2771:15 2783:17 2785:2,6 2793:28 2824:27	shuts 2830:5,15 2832:21
revised 2794:5 2808:3	scenario 2838:10 2848:21	served 2789:6 2794:6 2806:5,8 2873:27	side 2824:4
revision 2786:2	scenarios 2843:24	serves 2828:20	significance 2818:12
right-hand 2757:10	Schaefer 2788:14,16, 22,27 2789:4,13,15,17, 19 2790:24 2792:3,5,15 2794:7	service 2786:11 2794:2,18 2796:14,18 2806:23 2807:6,23 2814:13 2816:13 2817:21 2818:8 2820:1 2838:5 2846:23 2847:23 2848:5,22 2851:3 2852:13 2855:16	signing 2820:2
rights 2838:1 2848:12 2856:17 2857:28 2859:1 2868:23	schedule 2786:27,28 2787:3 2876:1,6,9	services 2796:6,15 2808:16 2809:20 2810:8 2811:14 2843:7 2864:6	similar 2757:26 2766:25 2769:14 2770:2,9,10 2778:16,17 2834:26
rising 2844:1	scope 2761:28 2781:5, 9 2782:27 2783:26 2852:19 2857:4	SESSION 2806:1	similarly 2796:21
risk 2823:6 2833:19 2834:11 2845:16 2852:28 2855:18	SDG&E 2760:26 2761:11	set 2824:3	simplicity 2760:10
risks 2847:4	season 2836:12 2850:7	shaking 2868:6	simply 2786:10 2800:1, 7,15,18,22,25
role 2791:4 2844:15	section 2808:10 2809:10 2811:18,20 2815:12	shape 2776:15	simultaneously 2851:5
rule 2760:15 2761:20 2763:5 2764:1,7,11,16 2773:15 2776:10,27 2777:19 2778:1	secured 2871:23	share 2853:1	Singh 2845:7
ruled 2785:26 2788:23 2804:14	sell 2857:21	sheet 2861:4	single-fire 2852:5
Rules 2789:2,10	sells 2852:11	SHEK 2803:1	situation 2778:4 2838:2 2840:2,19
<hr/> S <hr/>	Sempra 2756:3,13 2758:2 2761:25 2762:7, 10,14 2763:4,8,10 2764:28 2766:5,18,19, 21 2768:11 2778:6	Sher 2754:1,4,19 2767:5,8 2773:17 2774:4 2776:11 2778:24,25 2779:3,5, 17,20,23,25 2780:3,10, 12 2793:9,13	situations 2826:27
Sacramento 2798:4			slam 2827:8,9 2829:26 2830:5,15 2832:20 2833:28
safe 2855:15			slam-shut 2823:4,24, 26 2825:12 2826:21,26 2828:3,14 2829:26 2832:10
			slightly 2823:28
			Slocum 2801:12

slow 2758:10	staff 2775:21 2776:14	stipulation 2802:8,17 2869:1,5	Sumeet 2845:7
Socalgas 2760:26 2761:11 2763:20 2809:28 2812:11 2814:26 2820:8 2821:16,26 2822:10	Stafford 2797:11	Street 2787:26 2798:4	summarizes 2825:28
Socalgas' 2815:18	stand 2781:24 2787:11 2792:24 2797:19 2799:14 2806:10	stricken 2783:26 2784:8,10 2785:4 2790:23	summary 2853:24 2854:8
Socalgas's 2812:17,25 2813:10 2814:16	standalone 2795:16	strike 2784:15,17 2791:13	superscripts 2800:6
solely 2816:5	stands 2817:8	striking 2783:8 2784:1 2791:18	supplies 2842:18 2864:6
solution 2814:27 2815:4 2833:21	start 2780:2 2791:10 2793:2 2801:15 2822:27 2875:6 2876:10	struck 2800:5	supplying 2842:19,21, 22
sort 2771:26,27 2782:21 2810:23 2821:14 2827:18	started 2754:27 2853:16	structures 2851:18	support 2768:22 2807:2 2836:12 2862:23
sounds 2787:6 2849:8	starting 2763:17 2791:23 2807:10 2808:11 2816:17 2847:16	struggling 2857:10	surpluses 2867:21
source 2831:8	state 2787:22 2797:28 2809:13 2812:15 2841:2 2853:27 2854:2 2856:5	studies 2818:11,19	surprise 2876:22
Southern 2773:5,26 2774:15 2809:24 2810:1	stated 2761:23 2807:20 2808:14 2811:21 2812:23 2815:17 2817:3 2818:23 2871:18	study 2840:8	survey 2816:25 2817:16 2818:3,7,17,23
speaking 2860:6	statement 2755:25 2781:20 2792:1 2806:27 2860:5,8,15	stuff 2764:10 2819:20	surveys 2816:16 2818:13,20,21,28
special 2809:14	statements 2838:25	submit 2785:28 2874:21 2875:10	sustain 2844:7
specific 2811:4 2819:25 2820:13	states 2776:18 2781:4 2833:10 2836:28 2846:6 2847:21 2853:25 2865:4	submits 2874:19	Sustained 2852:20
specifically 2758:23 2759:22 2813:18	statewide 2850:4	submitted 2793:12 2799:15 2874:26	sworn 2787:15 2797:24 2806:11
specificity 2840:7	stating 2816:25	subsequent 2832:4	system 2818:19 2824:7 2829:11 2831:7 2833:12,20
specifics 2781:18 2811:12 2814:10	station 2824:26 2829:4,27	subsequently 2852:13	systemic 2834:25
speculate 2841:28	stations 2823:6,20 2824:15 2826:15,25	substantial 2862:19	systems 2828:4,10,15, 17,19 2829:23 2830:16
speculation 2841:25 2852:21	statistically 2818:24 2819:1	substantially 2837:5	
spell 2755:20	steel 2829:18	substantive 2801:24	T
spelling 2787:23 2798:1	steps 2827:16,19,20 2833:26 2852:28 2856:22	substantively 2760:7 2778:18	table 2800:4,11 2826:9, 13
spike 2833:22		substitute 2794:4	Tables 2799:22
spirit 2858:3 2859:15		suffer 2851:9	tackled 2804:16
spoke 2786:17 2794:7		sufficient 2775:28 2869:8	Tag 2801:12
sponsoring 2783:19, 21 2785:8 2789:25,26 2802:20		suggestion 2801:8	takes 2805:16
Springs 2820:9 2821:26		suggestions 2874:12	taking 2762:28 2827:16 2833:26 2840:14
		Suite 2787:27	talk 2850:1 2852:26 2857:16 2859:22 2866:21
		sulfur 2834:6	talked 2849:22
		sulphur 2824:6,11	

talking 2875:28	testified 2787:15 2797:24 2807:2 2827:22	threats 2833:12	2809:11,14 2810:8 2811:15,19,21 2814:1 2815:21 2816:1 2819:22,26 2820:6 2821:24 2822:4
talks 2833:25 2844:3 2864:26 2865:1	testifying 2791:3 2810:14 2857:1	three-mile 2812:18,26 2813:11	
target 2818:24	testimonies 2785:9	thusly 2804:12	
targeted 2816:28	testimony 2754:28 2761:17 2763:7,9 2764:26 2765:19,26 2768:4,28 2769:2 2770:13 2776:12,23 2778:9 2780:28 2782:21 2783:9,17,19, 21 2784:2,18,20 2785:3,6,7,14,18,20,21, 26 2788:4,6,10 2789:6, 24,26 2790:12,16 2791:2 2792:9,12 2793:6,18 2794:1,15,23 2795:1,6,10,20 2799:20,23,28 2800:3, 14 2803:8 2806:28 2807:2,5,10 2809:9 2818:10 2823:9 2830:18 2831:3,21 2835:24 2836:2,16,25 2837:13 2838:13,25 2839:3,11,28 2840:9 2841:26 2844:3,10 2845:6,15,23 2847:8 2848:28 2850:15,16 2852:19 2857:4 2859:25 2860:5 2866:22 2869:28 2874:26	time 2759:7 2775:17 2780:24 2786:23 2790:2 2812:20 2822:8 2838:4 2850:17 2854:12 2860:3 2875:8	transcribe 2758:11
tax 2755:12,17 2756:9 2758:21,22,26,27,28 2759:1,2,3,4,20,21,24, 25,26,27 2760:1,2,3,13, 14,15 2761:5,12,17,20, 23,26,27 2762:1,19,28 2763:5,14,23,25,26,27, 28 2764:1,7,11,16 2765:21,22,23,25,27 2766:5,9,10,11,13,25 2767:27,28 2768:1,2, 10,12,13,18,26 2769:4, 28 2770:17,19,22,23 2771:7,8,20,21,25 2772:1,4 2773:9,10,11, 12,15 2775:19 2776:10, 27 2777:7,9,19,20,22, 28		timely 2847:2	transcribing 2817:25
tax-related 2755:9		titled 2795:19,23 2797:4	transcript 2786:19 2872:8 2875:7
taxed 2772:10		TMA 2755:8,15,16 2761:27 2763:21 2764:5	transmission 2846:18, 22 2855:6
taxes 2755:19 2763:2 2764:15 2770:19 2771:28 2773:13,14 2776:2,5,12 2777:5,6,7, 25		today 2756:19 2768:4 2778:10 2791:3 2806:5	Transportation 2831:9
team 2801:12		tomorrow 2786:24 2875:6,28 2876:12,17, 18	treat 2766:13
technical 2865:13		top 2759:9 2826:8 2833:5 2853:9	treated 2796:9
technological 2814:27 2815:3	text 2825:25	topic 2822:16 2835:5, 12	treating 2804:11
tells 2859:1	thank 2875:21	topics 2866:23	treatment 2766:27 2769:23 2770:10
temporary 2830:6	thing 2859:22 2875:27 2876:23	Torres 2801:20 2841:24 2844:2 2850:9 2852:18 2856:25 2858:6 2868:7,8,11,16, 18 2871:4 2872:8,10, 13,23 2873:16,19	trouble 2811:26
term 2859:5,8,9	things 2782:2 2820:3 2834:9,14	total 2800:23 2816:18, 27	true 2754:13 2798:28 2808:22,25,26 2809:2,5 2811:1 2822:7 2841:9
Terminology 2797:5 2861:6	thinking 2875:6	track 2763:10,11 2764:6,22 2765:22,24 2767:27 2768:10,12 2771:20	true-up 2763:22 2764:14 2769:15,17 2770:2,11,16 2771:27
terms 2776:9 2777:15 2796:17 2824:1 2829:13,19 2844:18	thought 2810:24 2832:7,14 2865:25 2874:4	tracked 2771:23	turn 2754:28 2755:23 2756:5 2758:1 2762:14 2763:13 2787:17 2796:7,9 2797:24 2802:25 2803:13,19,21 2804:6,8 2821:7 2823:8,13 2825:23 2827:13,15 2832:24 2835:6,23 2836:2,16 2838:27 2839:2 2854:10 2855:23 2864:18 2867:26 2872:23 2875:5
territory 2851:3 2852:14	thousand 2869:21	tracking 2833:17	TURN's 2797:14 2802:22 2814:5 2835:28 2836:28 2839:21 2852:8
test 2762:12	threat 2834:10	tracks 2765:28 2766:10 2768:1	TURN-004 2797:15
Test-year 2802:9	threatened 2855:8	traditional 2874:10	TURN-03 2798:18
	threatening 2853:17	tragically 2851:25	TURN-3 2795:24
		transactions 2808:10	turning 2761:25 2799:19 2807:9

2816:15 2819:28 2820:1	universe 2818:16	vendors 2837:7 2842:1 2843:3	Wildland 2797:10
turns 2770:5	unknown 2842:1	vendors' 2837:23	withdraw 2790:13
two-thirds 2864:23	Unquote 2757:27	verification 2814:28 2815:4	withdrawn 2792:9
type 2870:24	unreasonable 2849:4	version 2788:9 2789:7, 8,21 2793:22,28 2794:5,23,28 2795:5, 14,15,25 2798:19 2803:8,28 2808:3	witness' 2844:3 2852:19
types 2867:19	unrelated 2776:10 2829:11	versions 2785:3	witness's 2841:26
typically 2874:20	unusual 2821:14	versus 2777:10 2810:23 2818:13,21	witnesses 2783:19 2785:8 2788:4 2802:20
<hr/> U <hr/>	unvariable 2842:15	vicinity 2813:17 2816:28	wondering 2758:3 2869:12
U.S. 2867:21	update 2800:1,25	view 2775:18	word 2760:15 2771:27 2773:11
UC 2837:27	updated 2799:21 2800:7,9,15,26 2874:26	volume 2822:3	words 2763:14 2829:5 2833:17
UE 2790:28	usage 2871:14	<hr/> W <hr/>	work 2781:1 2782:8,9 2785:17 2786:22 2807:5 2874:8
ultimate 2784:10 2821:16	UTAS 2781:19,22,24 2782:26	wait 2817:24 2839:22 2848:3 2870:5	worked 2807:5,6
ultimately 2871:23	utilities 2755:27 2756:2,3,14 2758:2 2763:3,4 2767:17 2768:7 2853:14 2854:27 2855:17 2856:2,21 2866:24	waived 2780:3	working 2782:12 2791:2 2808:2 2874:23 2876:10
unable 2847:18	utilities' 2766:2	wanted 2754:27 2820:8 2821:10,17 2822:27 2823:3 2828:23,24 2831:23 2832:26 2835:6 2836:24 2837:9 2846:3 2847:19 2850:1 2852:26 2853:2 2854:10 2855:23 2859:22 2861:9 2863:1 2864:18,28 2874:4 2875:21	worst-case 2843:23
unavailability 2845:4 2846:10,19 2847:26	utility 2771:7 2775:28 2776:15,16 2794:16 2802:18 2816:11 2829:25 2851:22 2853:17 2856:24	warrant 2809:14	wrap 2767:15
unbanked 2808:22	Utilization 2864:14	water 2824:6 2834:6	writing 2799:14
uncertain 2841:22 2842:13	utilize 2837:7	weather 2861:22	wrong 2781:3 2807:26 2831:13
uncertainties 2761:6	<hr/> V <hr/>	website 2861:4	<hr/> Y <hr/>
uncertainty 2761:12 2840:27	valid 2818:24 2819:1	weeks 2876:7	year 2762:12 2841:1 2852:2
unclear 2810:24 2821:15	Valley 2828:24,27 2831:10 2832:11 2834:16	West 2787:26	years 2770:21 2771:5 2790:4 2817:22 2826:24 2839:16 2841:14 2849:26 2869:11,13
underbanked 2808:23	valuable 2865:8 2870:13	wildfire 2845:16 2846:9 2852:28 2861:19	yesterday 2853:3
underlying 2843:14	valuations 2834:3	wildfires 2839:14 2851:17,26 2855:5,9,19 2867:12	<hr/> Z <hr/>
undermine 2838:20	values 2800:15		Zimney 2801:3,10,13, 19 2806:15,17,20 2807:11,13,17 2808:4,8 2810:13,26,27 2811:3,6 2812:1,2,28 2813:3 2815:16 2816:23
underneath 2826:15	variety 2781:27		
understand 2776:13 2777:17 2782:27 2826:5	vast 2862:1		
understanding 2766:14 2768:17 2824:25 2828:18 2857:15 2860:18 2863:6,24 2867:17,19 2868:27	vendor 2796:18 2838:7 2841:7 2842:12 2859:2 2869:4		
unit 2782:7			
units 2839:18			

2818:1 2819:9,11