

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

January 14, 2022 -11:30 a.m.

[Remote Hearing conducted via Webex]

RE: DE 21-029
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
Petition for Approval of Change in
Regulatory Reconciliation Adjustment
Rate
[Hearing]

PRESENT:

Chairman Daniel C. Goldner, Presiding
Commissioner Carleton B. Simpson

Doreen Borden, Clerk
Corrine Lemay, Web Moderator

APPEARANCES:

Reptg. Public Service Co. of NH, d/b/a
Eversource Energy:
Jessica Bruno Ralston, Esq. (Keegan...)

Reptg. N.H. Department of Energy:
Paul D. Dexter, Esq.

COURT REPORTER: SUSAN J. ROBIDAS, NHLCR NO. 44

I N D E X

WITNESS PANEL: MARISA B. PARUTA
 ERICA L. MENARD
 JENNIFER A. ULLRAM

EXAMINATION	PAGE
Direct Examination By Ms. Ralston	7
Cross-examination by Mr. Dexter	16
INTERROGATORIES BY COMMISSIONERS:	
By Commissioner Simpson	30
CLOSING ARGUMENTS:	
Mr. Dexter	39
Ms. Ralston	41

E X H I B I T S

EXHIBIT ID	D E S C R I P T I O N	PAGE NO.
10	Updated Petition for Approval for Change in Regulatory Reconciliation Adjustment Mechanism Rate	Premarked
11	RECORD REQUEST: Provide Excel versions of Attachments MBP/ELM/JAU-1/2/3	5

P R O C E E D I N G S

CHAIRMAN GOLDNER: Okay. Good morning. I'm Chairman Goldner, joined by Commissioner Simpson. I'll now call the second hearing today, Docket 21-029, to order. This hearing is on Eversource's petition for approval of change in the regulatory rate reconciliation adjustment mechanism rate. I'll note for the record that this is a request for an off-cycle adjustment resulting from the record being left open following a hearing occurring on July 16th, 2021 and Order 26,503 on July 30th, 2021. The Commission held the record open for additional filings, testimony if needed, and a further hearing to resolve issues concerning the settlement, the recoupment calculation, and the appropriate amount for recovery of vegetation management costs.

I'll also note that in Order 26,503, the Commission specifically requested that the filing parties provide the Commission with live spreadsheets for all

1 work papers relating to request for rate
2 recovery or any other financial recovery.
3 So, unfortunately, I need to start the
4 hearing off with a record request for live
5 spreadsheets of Attachments MBP/ELM/JAU-1,
6 MBP/ELM/JAU-2, and the same for /3.

7 So let's take appearances.
8 Eversource.

9 MS. RALSTON: Jessica Ralston from
10 the law firm of Keegan Werlin, on behalf of
11 Public Service Company of New Hampshire,
12 doing business as Eversource Energy.

13 CHAIRMAN GOLDNER: Thank you, Ms.
14 Ralston.

15 Department of Energy.

16 MR. DEXTER: Good morning, Chairman
17 Goldner and Commissioner Simpson. My name is
18 Paul Dexter. I'm an attorney with the
19 Department of Energy.

20 CHAIRMAN GOLDNER: Thank you, Mr.
21 Dexter.

22 So for preliminary matters,
23 Exhibit 10 has been prefiled and premarked
24 for identification. Is there anything else

1 that we need to cover regarding exhibits?

2 [No verbal response]

3 MR. DEXTER: Nothing from the
4 Department.

5 CHAIRMAN GOLDNER: Thank you.

6 Any other preliminary matters
7 before we have the witnesses sworn in?

8 [No verbal response]

9 CHAIRMAN GOLDNER: No. Does anyone
10 object to the witnesses in the prefiled
11 testimony?

12 [No verbal response]

13 MR. DEXTER: No objection.

14 CHAIRMAN GOLDNER: Thank you. So
15 let's proceed with the witnesses.

16 Ms. Robidas, would you please swear
17 in the panel of witnesses.

18 (WHEREUPON, MARISA B. PARUTA, ERICA L.
19 MENARD, JENNIFER A. ULLRAM were duly
20 sworn and cautioned by the Court
21 Reporter.)

22 MARISA B. PARUTA, SWORN

23 ERICA L. MENARD, SWORN

24

1 JENNIFER A. ULLRAM, SWORN

2 CHAIRMAN GOLDNER: Okay. Very
3 good. We'll move to direct examination.
4 I'll recognize Ms. Ralston.

5 MS. RALSTON: Thank you.

6 DIRECT EXAMINATION

7 BY MS. RALSTON:

8 Q. I will start with Ms. Paruta. Would you
9 please state your full name, your company
10 position and your responsibilities.

11 A. (Paruta) My name is Marisa Paruta. I'm the
12 director of revenue requirements for
13 Connecticut and New Hampshire. I'm
14 responsible for the coordination and
15 implementation of revenue requirement
16 calculations and regulatory filings for the
17 Connecticut and New Hampshire electric and
18 gas subsidiaries of Eversource Energy.

19 Q. And are you familiar with the exhibit that
20 has been marked as Exhibit 10, which is the
21 Company's initial filing submitted on
22 January 4th that's under consideration today?

23 A. (Paruta) Yes. Exhibit 10 includes testimony
24 and attachments that I co-sponsored with Ms.

1 Menard and Ms. Ullram.

2 Q. Do you have any corrections or amendments to
3 Exhibit 10?

4 A. (Paruta) No, I do not.

5 Q. And do you adopt Exhibit 10 as part of your
6 sworn testimony today?

7 A. (Paruta) Yes, I do.

8 Q. Thank you.

9 And Ms. Menard, would you please state
10 your full name, company position and
11 responsibilities.

12 A. (Menard) My name is Erica Menard. I'm the
13 manager of revenue requirements, employed by
14 Eversource Energy Service Company,
15 responsible for New Hampshire rates.

16 Q. Thank you. And are you familiar with the
17 exhibit marked as Exhibit 10, which is the
18 Company's initial filing as submitted on
19 January 4th?

20 A. (Menard) Yes, I am. Exhibit 10 includes
21 testimony that I co-sponsored with Ms. Ullram
22 and Ms. Paruta.

23 Q. And do you have any corrections or amendments
24 to Exhibit 10?

1 A. (Menard) No, I do not.

2 Q. And do you adopt Exhibit 10 as part of your
3 sworn testimony today?

4 A. (Menard) Yes, I do.

5 Q. Thank you.

6 And Ms. Ullram, would you please state
7 your full name, company position and
8 responsibilities.

9 A. (Ullram) My name is Jennifer Ullram. I'm the
10 manager of rates. In this role I'm
11 responsible for all activities pertaining to
12 rate design, cost of service and rates
13 administration for the Eversource Energy
14 subsidiaries in both New Hampshire and
15 Connecticut.

16 Q. And are you familiar with the exhibit marked
17 as Exhibit 10, which is the Company's initial
18 filing as submitted on January 4th?

19 A. (Ullram) Yes. That exhibit includes
20 testimony and attachments that I co-sponsored
21 with Ms. Paruta and Ms. Menard.

22 Q. And do you have any corrections or amendments
23 to Exhibit 10?

24 A. (Ullram) No, I do not.

1 Q. And do you adopt Exhibit 10 as part of your
2 sworn testimony today?

3 A. (Ullram) Yes, I do.

4 Q. Thank you.

5 And could the panel summarize the
6 Company's request today with respect to the
7 regulatory reconciliation adjustment rate,
8 also known as the RRA rate.

9 A. (Paruta) Yes. So the Company's RRA rate was
10 effective August 1 of 2021 pursuant to the
11 Settlement Agreement that was approved in
12 Docket 19-057. The Company is proposing an
13 adjustment to the RRA rate for effect
14 February 1, 2022, and that adjustment is
15 going to be for a six-month period.

16 Q. And why is the Company proposing an interim
17 adjustment to the RRA rate at this time?

18 A. (Paruta) Pursuant to the terms of the
19 Settlement Agreement that was approved in
20 19-057, Eversource refunded \$3.482 million
21 through the RRA for the six-month period of
22 July through December 2020 that was related
23 to the vegetation management portion of the
24 RRA. That over-recovered vegetation

1 management amount of 3.482 million was the
2 difference between the amount that was used
3 as the base rate recovery level within our
4 calculation and the actual vegetation
5 management spend. The Department of Energy
6 did dispute that base rate recovery level at
7 the July 16, 2021 hearing in this docket, and
8 in response to the issues that were raised by
9 the Department of Energy, the Commission did
10 leave the record open with respect to the
11 vegetation management portion of the RRA.
12 And since that time, the Company has
13 conducted additional analysis, engaged with
14 DOE Staff, and now presenting a proposed rate
15 adjustment.

16 Q. Than you. And can you please provide a brief
17 overview of the Company's analysis and
18 findings?

19 A. (Paruta) Sure. The Company determined that
20 the amount used as the base rate recovery
21 level was incorrect, and this filing proposes
22 a revised reconciliation amount to reflect
23 this. The base rate recovery level that
24 should have been used was the annualized

1 amount for vegetation management allowed in
2 temporary rates pro rated for the period from
3 July 1, 2020 to December 31, 2020. This is
4 appropriate because it was approved in our
5 Settlement Agreement. The recoupment
6 calculation included a specific adjustment
7 for vegetation management to remove the
8 effects of the difference between the
9 temporary and permanent rates. So, said
10 differently, the recoupment calculation that
11 brought our temporary rates to permanent
12 rates had to be negated for vegetation
13 management, as it was decided that the
14 temporary rates for vegetation management
15 specifically would stay in effect for the
16 full temporary rate period ending
17 December 31, 2020.

18 The Company recommends a corrected
19 vegetation management program refund amount
20 of \$4.332 million for the six-month period
21 July to December 2020, which is \$850,000
22 higher than the refund that we had proposed
23 in the initial RRA filing and presently
24 included in rates. The 4.332 million amount

1 represents the difference between the actual
2 amount recovered in base distribution rates
3 and the actual vegetation management
4 spending.

5 Q. And have you provided any documents
6 demonstrating this revised refund amount?

7 A. (Paruta) Yes, Attachment MBP/ELM/JAU-1. And
8 then MBP/ELM/JAU-2 shows the revised refund
9 amount. And the Company has also presented
10 this analysis to DOE Staff.

11 Q. And can you just summarize Eversource's
12 request in terms of what we're asking the
13 Commission to approve today?

14 A. (Paruta) The Company is requesting approval
15 to adjust the RRA to refund the
16 over-collection for vegetation management.
17 And the requested adjustment would apply to
18 the six-month period from February 1, 2022 to
19 July 31, 2022. The adjusted rate is .023
20 cents per kilowatt hour, a higher credit than
21 the presently approved rate of negative .012
22 cents a kilowatt hour. The Company is
23 requesting this off-cycle adjustment to
24 resolve the vegetation management issue that

1 remains outstanding. Approving this
2 adjustment for February 1, 2022 aligns nicely
3 with the other adjustments proposed by the
4 Company for the same date, and it will help
5 to mitigate any overall bill impacts that may
6 occur from those other adjustments.

7 Q. And has this proposed adjustment been
8 calculated consistent with the terms of the
9 Settlement Agreement from Docket DE 19-057?

10 A. (Paruta) Yes. Attachments MPB/ELM/JAU-1 and
11 2 do provide the calculation of the revised
12 vegetation management variance for the
13 calendar year 2020. No other adjustments to
14 the currently approved RRA rate were made.
15 And the Company has allocated the total
16 average RRA rate to each rate class
17 consistent with the allocation methodology
18 that we used to allocate the Step 1 and
19 Step 2 rate adjustments. These allocations
20 are shown in Attachment MPB/ELM/JAU-2.

21 Q. And can you provide the bill impact for an
22 average residential customer associated with
23 the adjustment?

24 A. (Paruta) Jen, I'm going to ask you --

1 A. (Ullram) Yeah. Sorry. I couldn't get myself
2 off mute.

3 Certainly. So in MPB/ELM/JAU-3, we
4 included the impact to the average
5 residential customer for customers with 550,
6 600 and 650 kilowatt hours per month. And
7 those bill impacts range from a credit of 8
8 cents a month on a customer's bill to 11
9 cents. Obviously the higher the usage, the
10 larger the credit. And that's provided in
11 Bates Page 27 of the filing.

12 Q. Thank you. And does the adjustment result in
13 rates that are just and reasonable?

14 A. (Ullram) Yes, it does.

15 Q. Thank you.

16 MS. RALSTON: No further questions.
17 The witnesses are now available for
18 cross-examination.

19 CHAIRMAN GOLDNER: All right.
20 We'll move to cross-examination, and I'll
21 recognize Mr. Dexter.

22 MR. DEXTER: Thank you, Chairman
23 Goldner.

24 CROSS-EXAMINATION

1 BY MR. DEXTER:

2 Q. I guess I would like to start by turning to
3 Bates Page 21 -- Bates Page 20. And I would
4 like to ask the witnesses about the column
5 labeled "Change" and Lines 8 and 9. I see
6 two rates there -- or two, I guess they're
7 rates, cents per kWh -- of 0.23 and 0.35.
8 And I would like to ask them what exactly is
9 proposed in this case and what's the
10 difference between those two numbers.

11 A. (Ullram) So Erica, I can take this. It
12 doesn't matter.

13 So the Line 8, the adjusted average RRA,
14 so that's the incremental credit on top of
15 the already average rate that's currently
16 being billed of .012. So the total of those
17 two would be from February 1st to July 2022.
18 The average RRA rate would be a credit of
19 .035 cents per kilowatt hour.

20 Q. And so I know -- and we'll get into the
21 differences in the classes shortly. But are
22 you saying that what's proposed for approval
23 in this docket is an RRA rate of negative
24 .035 for effect February 1st, and to stay in

1 effect for six months?

2 A. (Ullram) Correct.

3 Q. Okay. And if we -- okay. I'll leave it at
4 that.

5 So let's turn now to Page 22. This page
6 looks familiar to me from the very hot
7 hearing day we held back in July that I
8 recall. And I'd like the witnesses to tell
9 me what's the difference between this
10 schedule and what was presented back in July
11 on the equivalent schedule.

12 A. (Paruta) Yes. So if you look at Line 7 of
13 the schedule, when this was originally filed
14 within our RRA filing and reviewed in July
15 during our hearing, the July through
16 December 2020 base rates amount of 6850
17 indicated an even \$6 million.

18 Q. And everything else on this schedule is the
19 same as we saw it last summer?

20 A. (Paruta) We have not changed anything else in
21 this schedule.

22 Q. Okay. And then could you -- I know you went
23 over it fairly quickly on direct. But could
24 you just explain again why the number in that

1 box goes -- what was 6 million -- you said
2 was 6 million and is now \$6,850,000.

3 A. (Paruta) Sure. I can walk through what we
4 believe to be the history behind that, based
5 on hindsight and taking a look at what's on
6 record.

7 So the Company -- and I apologize. The
8 Company, during the temporary Settlement
9 Agreement, determined that the amount that
10 would be recovered for vegetation management
11 costs would be a total of \$7.7 million for
12 the period of July 1, 2019 through
13 December 31, 2019, and the subsequent
14 six-month period in the temporary Settlement
15 Agreement for January 1, 2020 through
16 June 30, 2020 would be \$6 million. When
17 COVID occurred, there was an extension of the
18 temporary rate settlement, resulting in an
19 18-month period of the temporary settlement
20 as opposed to the 12-month period. So,
21 essentially, the Company had determined that
22 the amount that would be allowed to be
23 recovered in that third trunk in the
24 temporary settlement period as a result of

1 the COVID extension was \$6 million. So that
2 was the assumption used when determining the
3 RRA calculation that was submitted in our --
4 and reviewed in our July hearing, the
5 \$6 million.

6 Upon further evaluation when the DOE
7 Staff had challenged that number, we did go
8 back and we took a look at the amounts that
9 were actually included within the rate
10 calculation. And what we determined was the
11 permanent Settlement Agreement locked in the
12 vegetation management allowance in rates that
13 was 13.7 million for the 12-month period. So
14 we determined that within the permanent
15 Settlement Agreement, our rates effective for
16 the period July 1, 2019 through December 31,
17 2020 would be at 13.7 times a 1.5 factor, if
18 you will, to carry you over through the full
19 18-month period.

20 What we didn't -- at the time when we
21 were preparing our RRA calculation, what we
22 didn't evaluate was the fact that for the
23 third trunk period, our rates reflected the
24 13.7 million simply divided by two, which is

1 how it was calculated when we ultimately
2 determined the rates billed to customers.

3 So when the DOE Staff challenged us,
4 there was certain, I'll say confusion in
5 terms of what was actually included in
6 permanent rates for vegetation management.
7 And they challenged us to say that that 6
8 million should have been 13.1 million, which
9 is the vegetation management allowed in
10 permanent rates, but did not take effect
11 until January 1, 2021. And they had
12 challenged us -- the DOE Staff had challenged
13 us that the 6 million should be 13.1 million
14 divided by 2, which was the 6,550,000 that
15 was discussed at the hearing. But again,
16 when we went back and took a look at the
17 records and took a look at the rates, we had
18 calculated the rates in effect for the period
19 July 1, 2019 through December 31, 2020, using
20 the 13.7 times a 1.5 factor. So as a result
21 of that, the amount that should have been
22 included in that RRA schedule was truly the
23 6,850,000.

24 Q. And, again, the 6,850,000 is an annual amount

1 of vegetation management costs built into
2 base rates of 13.7 million -- do I have that
3 right -- divided by two?

4 A. (Paruta) That's correct.

5 Q. Thank you. So getting to the -- so that
6 explains, then, I believe, where the \$850,000
7 that shows up on Bates 21 comes from. And
8 we've talked about how that gets translated
9 into the proposed rate.

10 With that, I'd like to turn to Bates
11 Page 23, where the rate is being allocated to
12 the various classes. And starting with the
13 residential rate, just confirm that the rate
14 has -- the size of the credit has doubled on
15 Line 1. Do I have that right?

16 A. (Ullram) Yes, it has.

17 Q. Okay. And again, we don't -- if we go back
18 to Page 20, we see three different rates on
19 that sheet on Lines 8 and 9 that we just
20 talked about. Those are in cents per kWh.
21 And then I go forward to Page 23, and I guess
22 I'm in dollars per kWh for Rate R. But I
23 don't see any of those other three rates that
24 are on the prior page either in effect or

1 proposed. Can you explain that?

2 A. (Ullram) Sure. So on Bates Page 20, those
3 are average rates. So what we first do is we
4 create an overall average rate. So when we
5 had discussed on Bates Page 20 that .035
6 cents per kilowatt hour, that was the average
7 rate. And as you alluded to earlier, the --
8 we allocate differently to each rate class
9 based upon our allocation methodology that
10 was approved in the settlement. So just like
11 we did in each of our step adjustments, as
12 well as last year's RRA calculation, Bates
13 Page 25 shows the allocation to each rate
14 class.

15 And so what you'll see on Bates 25 is
16 that we are taking the entire proposed
17 adjustment that equates to the .035 cents per
18 kilowatt hour, revenues that equate to that
19 amount, and we're allocating it across each
20 of the rate classes using equal class
21 percentage increase based on revenues. And
22 so that page allocates the revenues in
23 Column C to create an RRA target, and that's
24 the total target.

1 And then Page 26 shows the detailed
2 allocation and the math behind getting to
3 either the per kW or per kilowatt-hour rate
4 for each rate class.

5 Q. Thank you for that. Just one question on the
6 rate calculation on Page 25, Line 13.

7 Can you explain why the number on
8 Line 13 is 1,764,000 and not the 854,000 we
9 were talking about -- the 850,000 we were
10 talking about earlier?

11 A. (Ullram) Because it's a total rate and not
12 just the incremental. So the 850 is the
13 incremental rate. So it's taking the rate
14 that the revenue requirements are currently
15 being recovered through the RRA, as well as
16 the \$850,000 that's also being proposed for
17 this period, because we have to set a total
18 RRA rate and not just the incremental piece
19 of it. So this is setting the total rate for
20 the period.

21 Q. Okay. Thanks.

22 So, again, back on Page 23. I see a
23 footnote in Column B, which you can read.
24 And I'd just ask you to explain that footnote

1 to me because I don't understand it.

2 A. (Ullram) That would be a leftover footnote
3 from a prior, because it should say based on
4 the average rate of the .00 -- or .012 cents
5 per kilowatt hour.

6 Q. Well, that's what it does say.

7 A. (Ullram) Oh, yeah. Sorry. Pardon me. I was
8 reading it as .011.

9 Yes, so that is just showing you what
10 the current average RRA rate is currently in
11 effect plus the incremental piece. The
12 footnote probably should be clearer, to be
13 honest with you, because it should say the
14 proposed rates are based on an average
15 retail -- yeah. I'd have to think about how
16 to make that clearer. It really just should
17 be referring back to Bates 26 or 25, in all
18 reality.

19 Q. Okay. But I thought we established that the
20 average rate for the interim period that's
21 proposed up on Bates 20 is 0.35 cents per
22 kWh; is that right?

23 A. (Ullram) Yes, you are correct. I'm looking
24 at it now. Sorry for the confusion. It was

1 a holdover from the last RRA. What it should
2 say is an average rate of .035 cents per
3 kilowatt hour. My apologies.

4 Q. Okay. So I understand, you're just trying to
5 make that tie between Page 20 to show that's
6 the rate that's proposed, and then Page 23
7 shows how it's allocated -- or shows the
8 results of the allocations between all the
9 classes.

10 A. (Ullram) Yes, that's correct. And I
11 apologize again for the confusion.

12 Q. So I want to go to Bates 27 and 28 for a
13 moment. Starting with Bates 27, can you tell
14 me what this schedule is intended to show?

15 A. (Ullram) So all the schedule's intended to do
16 is just to show the difference in the RRA
17 rate between the rates that are currently in
18 effect as of August 1st, 2021 to the rates
19 proposed for February 1st, 2022. So it's
20 just that one RRA rate change that's
21 occurring.

22 Q. How about the next page, Bates 28? What does
23 that show?

24 A. (Ullram) Yup. So that shows the rates that

1 were currently in effect as of February 1st,
2 2021 compared to what we're proposing for the
3 RRA rate change for February 1st, 2022. It
4 doesn't reflect the other changes that we
5 proposed either in the distribution rates
6 that we're proposing for February 1st or the
7 SCRC rates, or the supply rates that changed
8 also. So it's just isolating, and it's
9 really just for illustrative purposes, just
10 isolating the one change for the RRA.

11 And just for your own benefit, we do
12 have -- it's filed elsewhere in DE 21-117.
13 But we do have an exhibit that kind of
14 combines everything because, as you know, the
15 SCRC is the last one that gets filed. So we
16 wouldn't have had some of the rates in
17 effect -- or some of the proposed rates yet
18 filed. And so that's why each of these
19 individual ones, we just show the actual rate
20 that we're proposing to be changed in the
21 individual dockets. But there is an exhibit
22 that does show all of them. So I can tell
23 you the impacts overall if you'd like me to.

24 Q. No, that's fine. I guess we'll get to that

1 in the third docket today.

2 But just so I understand -- I'm on
3 Page 28 now. So, for example, the change
4 that you're pointing out, that's reflective
5 of what in this case falls in Column G;
6 correct?

7 A. (Ullram) That is correct.

8 Q. The change -- or the non-change that's shown
9 in Column F, the systems benefit charge,
10 that's not really the systems benefit charge
11 that's in effect on February 1st, 2022;
12 correct?

13 A. (Ullram) That's correct. It is not.

14 Q. It is the system benefit charge that was in
15 effect February 2021; correct?

16 A. (Ullram) That is correct.

17 Q. Just wanted to clear that up.

18 And lastly, I just want to carry these
19 rate changes into the proposed tariff which
20 is included. I had a couple questions. I'd
21 like to go to Bates Page 55.

22 A. (Ullram) Give me one second.

23 Q. Redlined version.

24 A. (Ullram) Okay.

1 Q. About the middle of the page, under the
2 heading "Water Heating - Uncontrolled" I see
3 a regulatory reconciliation adjustment of
4 .018 cents. And so if I go back to Bates
5 page, I guess 23, where all the rates are
6 laid out, I would expect to find that rate.
7 So let me do that.

8 So I'm back on Page 23. I'm at
9 Uncontrolled Water Heating, and I see that
10 the rate changed from .00009 to .00018. So
11 the proposed rate is the .00018; correct?

12 A. (Ullram) Yes. It looks like for some reason
13 the redlined change didn't get captured. I'm
14 not sure why. But you are correct, that it
15 should show, based on Bates 23, the change
16 from .009 -- a credit of .009 cents per
17 kilowatt hour to .018. And we could
18 easily -- I know we have to file a compliance
19 tariff after this, so we can make sure that
20 those redlined changes are captured.

21 Q. So the correct rate is included, it just
22 didn't show up in red as a change. Is that
23 what you're saying?

24 A. (Ullram) Yes, that's what it appears to be.

1 You know, subject to check, that's what it's
2 looking like on the sheet.

3 Q. And if we were to go to Bates Page 57 --

4 A. (Ullram) Yeah, I think this -- yeah, I just
5 noticed as I was flipping through, that one
6 looks like it didn't capture showing that we
7 are changing it from .016, but it is not
8 provided in the new one, which should be
9 .032.

10 Q. Sorry. I'm just getting there myself. So,
11 again, we're talking -- I guess you have to
12 go up to Page 55 now. And we're talking
13 about water heater controlled, and I see a
14 regulatory reconciliation adjustment that
15 looks like it's going from .016 to zero. And
16 I don't think we'd find a zero if we went
17 back to Bates Page 23; is that correct?

18 A. (Ullram) Correct. It should be .032.

19 Q. Okay.

20 A. (Ullram) Again, I'm not sure why those
21 redlined changes weren't captured, but we can
22 change those and update those when we make
23 our compliance filing to reflect the correct
24 amounts.

1 Q. Okay. Very good.

2 MR. DEXTER: That's all the
3 questions I had, Commissioners.

4 CHAIRMAN GOLDNER: Thank you, Mr.
5 Dexter.

6 I'll recognize Commissioner
7 Simpson.

8 COMMISSIONER SIMPSON: Thank you,
9 Mr. Chairman. That was a helpful line of
10 questioning from Mr. Dexter.

11 INTERROGATORIES BY COMMISSIONERS:

12 BY COMMISSIONER SIMPSON:

13 Q. I just want to go back at a high level and
14 understand where this adjustment originated
15 from.

16 So it sounds like the temporary rates
17 that Eversource put into effect were
18 different from the permanent rates as per the
19 Settlement Agreement. Is that a fair
20 characterization?

21 A. (Paruta) So I think the origination -- the
22 original discovery of an issue was not for
23 that reason, but ultimately we discovered
24 that there was a perpetual issue concerning

1 this. So the original issue was that we had
2 included an amount of \$6 million within the
3 reconciliation, and the DOE Staff challenged
4 that and said that that amount was incorrect.
5 They believed it should be what was included
6 in permanent rates for vegetation management
7 and what was allowed in permanent rates of
8 13.1 million divided by 2, which is
9 6,550,000.

10 So we had challenged and said was that
11 we were only allowed to recover \$6 million
12 for that third trunk period. COVID -- I will
13 say COVID created a bit of a complexity here
14 because it added a third period and a
15 temporary rate period, which is typically
16 only 12 months, as far as back in the history
17 I can recall for New Hampshire. So our
18 temporary rate settlement period of 12 months
19 turned into 18 months. And so that 13.1
20 million that was identified as what should
21 have been included within our RRA calculation
22 divided by 2, the 6,550,000, is what we took
23 away from the hearing and said, okay, let's
24 go back and see what was included in rates.

1 Now, when we went back to take a look at
2 what was actually included in rates billed to
3 customers for that third trunk period, we
4 discovered that what we included in there was
5 the temporary rates for veg management only.
6 Veg management was the only piece, along with
7 the Tax Cuts and Jobs Act -- so there were
8 two components of the temporary rate
9 settlement compared to the final permanent
10 Settlement Agreement that were treated very
11 differently than everything else when we go
12 from temporary to permanent rates. Because
13 of that, the amount that was included within
14 the temporary rate period was never adjusted
15 to reflect permanent rates, as is typical in
16 the type of rate reconciling factors in a
17 rate Settlement Agreement.

18 So because of that, the temporary rate
19 that was approved within the temporary
20 Settlement Agreement for the vegetation
21 management continued to be carried through
22 the 18-month period, and that temporary rate
23 Settlement Agreement had 13.7 million
24 annualized allowance for vegetation

1 management. So when you extend that through
2 that third trunk, because of COVID-created
3 complexity, the 13.7 divided by 2, which is
4 what was included in rates, is the 6,850,000.

5 A. (Menard) Commissioner Simpson, just if I
6 could add to it.

7 So because of the pandemic and because
8 our temp rate was separated into two pieces,
9 the language, when we extended the temp rate,
10 said to continue to spend at the temp rate
11 level. So the second piece of the year --
12 you know, as Ms. Paruta said, the first half
13 of the year was 7.7 and the second half of
14 the year was 6 million. The intent was to
15 ratchet down vegetation management spending
16 in the temp rate.

17 When the pandemic extended the temp
18 rate, we extended our vegetation management
19 spending at the \$6 million level because that
20 was the intent, only spend \$6 million. So
21 when we put together the reconciling
22 schedules, that's what we were thinking. We
23 compared it to the \$6 million level because
24 that's what we were allowed to spend. But

1 then when you take a look back at, well, what
2 did you actually recover in rates, we didn't
3 adjust rates down to that \$6 million level.
4 Temporary rates remained at the two pieces,
5 the 7.7 plus the 6 million. So the temp rate
6 level remained at that \$13.7 million. So if
7 you cut that in two, you say, okay, well,
8 half of that, when you extend it because of
9 the pandemic, it's really half of the 13.7
10 that got extended. So that led to the
11 confusion was just the intent of the temp
12 Settlement Agreement and the level of
13 spending versus what was actually collected
14 in rates, if that's helpful.

15 Q. So it was ultimately a somewhat
16 administrative error in terms of interpreting
17 what should be billed for vegetation
18 management costs in transition from temp
19 rates to permanent rates as dictated by the
20 Settlement Agreement?

21 A. (Paruta) I would say -- go ahead, Ms. Menard.

22 A. (Menard) I wouldn't say that we continued to
23 bill at the temp rate level. So, you know,
24 there wasn't any error in what we billed to

1 customers. It was just an interpretation of
2 what we were reconciling against for purposes
3 of RRA.

4 A. (Paruta) And to add to what Ms. Menard said,
5 the error occurred within the RRA schedule.
6 There was no error within temporary rates
7 that were billed. I will say this: There
8 was no error within the rates that were
9 billed to customers within the temporary rate
10 period. It was just a human error when we
11 interpreted the amount that was included in
12 base rates as what was recovered.

13 As Erica indicated, because we were
14 ratcheting it down, we expected a \$6 million
15 amount, which was the 6 million in the second
16 six-month period. And it can get confusing.
17 We keep tripping over this 18-month temporary
18 rate period. So I'm trying to make sure I
19 keep my six-month periods in order in my
20 mind, because that second six-month period
21 within the temporary rates was 6 million, and
22 the way the COVID extension happened, we
23 moved that 6 million within our thought
24 process into a third trunk. But because of

1 the way rates were calculated, it simply took
2 the 13.7 million and multiplied it by a 1.5
3 factor. So it essentially extended it out.
4 13.7 divided by 2 is what was included in
5 customers' rates, which is the 6,850,000.
6 So, no error in rates. It was simply an
7 error in what was ultimately used in the
8 calculation included in the RRA that was
9 evaluated and reviewed in the hearing this
10 summer.

11 Q. Okay. How is that not a rate error?

12 A. (Paruta) Let me go back and rephrase what I
13 said.

14 The temporary rates that were in effect
15 from July 1, 2019 through December 31, 2020
16 were not erroneous. The rate error that did
17 occur is in the calculation of the RRA that
18 ultimately impacted the rates that we changed
19 this past summer. Correct. I agree with you
20 there.

21 Q. Okay. Generally speaking, when
22 over-collections occur, does anyone on the
23 panel have thoughts regarding how to make
24 customers whole, in terms of the lost

1 opportunity cost and the cost of capital from
2 that over-collection?

3 A. (Paruta) Because this is going back to
4 customers within the rate year for which it
5 would have ultimately, we did discuss that
6 and determined that there would not be -- the
7 customers have not been held harmless because
8 it will go back to them appropriately within
9 the rates by the end of this rate period.

10 Q. Thank you.

11 COMMISSIONER SIMPSON: I have no
12 further questions, Mr. Chairman.

13 CHAIRMAN GOLDNER: Okay. Thank
14 you.

15 So I have no questions, but one
16 comment. And I'll just say that it does not
17 build confidence when the redline is wrong,
18 and it makes me wonder what else is wrong in
19 the filing. So I'll just mention that on the
20 record.

21 Any redirect for your witnesses,
22 Ms. Ralston?

23 MS. RALSTON: No redirect. Thank
24 you.

1 CHAIRMAN GOLDNER: Okay. The
2 witnesses are released. Thank you.

3 Without objection, we'll strike
4 I.D. ON Exhibit 10 and admit it as a full
5 exhibit.

6 And just as a reminder for the
7 record request I mentioned at the outset,
8 we'll mark that as Exhibit 11. That's
9 MPB/ELM/JAU-1, 2 and 3.

10 And Ms. Ralston, I know that you
11 are looking for, on these first two
12 dockets -- and I apologize for mixing my
13 dockets this morning. But would it be
14 reasonable on this docket and the prior one
15 to get the data by, say, Tuesday of next week
16 so that we have an opportunity to reply by
17 the timeline that you've asked for?

18 MS. RALSTON: I believe that
19 Tuesday is reasonable for the record request
20 in this docket. I am not sure if Tuesday is
21 feasible for the record request in the prior
22 docket. We may need a couple extra days for
23 those just to verify the data.

24 CHAIRMAN GOLDNER: Sure, sure.

1 MS. RALSTON: If we can have until
2 Wednesday or Thursday for the prior docket --

3 CHAIRMAN GOLDNER: Very sensible.
4 We will react as quickly as we can, in terms
5 of your requested deadline. So just know
6 that sooner is better, and it gives us a
7 better chance of hitting the February 1st --
8 or January 24th, depending on which deadline
9 you're looking for. So, yeah, the sooner the
10 better. So thank you.

11 MS. RALSTON: Of course.

12 CHAIRMAN GOLDNER: Okay. Thank
13 you.

14 So let's move to the closing
15 arguments. Energy and Mr. Dexter.

16 MR. DEXTER: Thank you. The
17 Department of Energy supports the rate change
18 presented here. We are pleased that \$850,000
19 will be passed back to customers through the
20 proposed rate, and we support doing it over
21 the remaining period so that it does take
22 place in the originally contemplated period
23 of the RRA mechanism.

24 We want to thank the Commission for

1 holding this issue open last summer when we
2 raised the issues that we did; that was our
3 questioning of the numbers in that case. I
4 don't think it was welcomed by the Company,
5 frankly, if you look at the statements during
6 that summer hearing. But we believed that we
7 were right at the time. And we understand
8 that this record shows that we weren't
9 necessarily right at the time, but we were
10 correct, it appears that we were correct that
11 there was a fairly significant error in the
12 schedule that shows up in this case on Bates
13 Page 22.

14 Having said that, we very much
15 appreciate the effort that Eversource put
16 forth before this hearing to investigate this
17 matter and look into this very complicated
18 issue of base rates, temp rates, COVID, and
19 reconciliation for the RRA, and, in fact,
20 contacted us to tell us, us being the
21 Department of Energy, that they believed that
22 an \$850,000 refund was appropriate. So we
23 appreciate the efforts that Eversource put in
24 to correct this, given the time allotted by

1 the Commission. But it was important that
2 the Commission held this issue open for
3 further investigation, particularly given
4 that the reconciliation dockets that the
5 Commission hears have to be decided fairly
6 quickly.

7 So having said all that, we
8 recommend approval of the rates as requested.

9 CHAIRMAN GOLDNER: Thank you, Mr.
10 Dexter.

11 Eversource and Ms. Ralston.

12 MS. RALSTON: Thank you, Chair
13 Goldner and Commissioner Simpson. And thank
14 you to the Department of Energy for raising
15 this issue and for working with us to reach
16 the resolution that we proposed today.

17 We don't have anything to add, just
18 simply we request that it be approved as
19 filed. And as I previously stated, we will
20 endeavor to provide the additional
21 information requested as quickly as possible.

22 CHAIRMAN GOLDNER: Okay. Thank
23 you, Ms. Ralston.

24 So before we close here, I'll just

1 mention that let's start the next hearing at
2 1 p.m. And that would be in 19-117. And
3 we'll regroup then. And if nobody has any
4 questions or concerns, I'll thank everyone.
5 We'll take the matter under advisement and
6 issue an order. We are adjourned. Thank
7 you.

8 (Whereupon the hearing was concluded at
9 12:26 p.m.)

C E R T I F I C A T E

I, Susan J. Robidas, a Licensed
Shorthand Court Reporter and Notary Public
of the State of New Hampshire, do hereby
certify that the foregoing is a true and
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I further certify that I am neither
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	14:3,6,13,19;22:11	annual (1) 20:24	39:19	23:7,23;25:13;26:22;
\$	administration (1) 9:13	annualized (2) 11:24;32:24	base (9) 11:3,6,20,23;13:2; 17:16;21:2;35:12; 40:18	28:19;29:21;31:17;
\$13.7 (1) 34:6	administrative (1) 34:16	apologies (1) 25:3	based (6) 18:4;22:9,21;24:3, 14:28;15	35:16;39:1,4
\$3.482 (1) 10:20	admit (1) 38:4	apologize (3) 18:7;25:11;38:12	Bates (20) 15:11;16:3,3;21:7, 10;22:2,5,12,15; 24:17,21;25:12,13, 22;27:21;28:4,15; 29:3,17;40:12	capital (1) 37:1
\$4.332 (1) 12:20	adopt (3) 8:5;9:2;10:1	appearances (1) 5:7	behalf (1) 5:10	capture (1) 29:6
\$6 (11) 17:17;18:16;19:1, 5;31:2,11;33:19,20, 23;34:3;35:14	advisement (1) 42:5	appears (2) 28:24;40:10	benefit (4) 26:11;27:9,10,14	captured (3) 28:13,20;29:21
\$6,850,000 (1) 18:2	again (8) 17:24;20:15,24; 21:17;23:22;25:11; 29:11,20	apply (1) 13:17	better (3) 39:6,7,10	carried (1) 32:21
\$7.7 (1) 18:11	against (1) 35:2	appreciate (2) 40:15,23	bill (5) 14:5,21;15:7,8; 34:23	carry (2) 19:18;27:18
\$850,000 (5) 12:21;21:6;23:16; 39:18;40:22	agree (1) 36:19	appropriate (3) 4:18;12:4;40:22	billed (7) 16:16;20:2;32:2; 34:17,24;35:7,9	case (4) 16:9;27:5;40:3,12
/	Agreement (15) 10:11,19;12:5; 14:9;18:9,15;19:11, 15;30:19;32:10,17, 20,23;34:12,20	appropriately (1) 37:8	bit (1) 31:13	cautioned (1) 6:20
/3 (1) 5:6	ahead (1) 34:21	approval (4) 4:7;13:14;16:22; 41:8	both (1) 9:14	cents (14) 13:20,22;15:8,9; 16:7,19;21:20;22:6, 17;24:4,21;25:2; 28:4,16
[aligns (1) 14:2	approve (1) 13:13	box (1) 18:1	certain (1) 20:4
[No (3) 6:2,8,12	allocate (2) 14:18;22:8	approved (8) 10:11,19;12:4; 13:21;14:14;22:10; 32:19;41:18	brief (1) 11:16	Certainly (1) 15:3
A	allocated (3) 14:15;21:11;25:7	Approving (1) 14:1	brought (1) 12:11	Chair (1) 41:12
across (1) 22:19	allocates (1) 22:22	arguments (1) 39:15	build (1) 37:17	CHAIRMAN (21) 4:2,3;5:13,16,20; 6:5,9,14;7:2;15:19, 22;30:4,9;37:12,13; 38:1,24;39:3,12;41:9, 22
Act (1) 32:7	allocating (1) 22:19	associated (1) 14:22	built (1) 21:1	challenged (7) 19:7;20:3,7,12,12; 31:3,10
activities (1) 9:11	allocation (4) 14:17;22:9,13;23:2	assumption (1) 19:2	business (1) 5:12	chance (1) 39:7
actual (4) 11:4;13:1,3;26:19	allocations (2) 14:19;25:8	Attachment (2) 13:7;14:20		change (12) 4:7;16:5;25:20; 26:3,10;27:3,8;28:13, 15,22;29:22;39:17
actually (5) 19:9;20:5;32:2; 34:2,13	allotted (1) 40:24	Attachments (4) 5:5;7:24;9:20; 14:10	calculated (4) 14:8;20:1,18;36:1	changed (5) 17:20;26:7,20; 28:10;36:18
add (3) 33:6;35:4;41:17	allowance (2) 19:12;32:24	attorney (1) 5:18	calendar (1) 14:13	changes (4) 26:4;27:19;28:20; 29:21
added (1) 31:14	allowed (6) 12:1;18:22;20:9; 31:7,11;33:24	August (2) 10:10;25:18	can (16) 11:16;13:11;14:21; 16:11;18:3;22:1;	changing (1) 29:7
additional (3) 4:15;11:13;41:20	alluded (1) 22:7	available (1) 15:17		characterization (1) 30:20
adjourned (1) 42:6	along (1) 32:6	average (14) 14:16,22;15:4; 16:13,15,18;22:3,4,6; 24:4,10,14,20;25:2		charge (3) 27:9,10,14
adjust (2) 13:15;34:3	amendments (3) 8:2,23;9:22	away (1) 31:23		check (1) 29:1
adjusted (3) 13:19;16:13;32:14	amount (22) 4:19;11:1,2,20,22; 12:1,19,24;13:2,6,9; 17:16;18:9,22;20:21, 24;22:19;31:2,4; 32:13;35:11,15			class (5) 14:16;22:8,14,20; 23:4
adjustment (18) 4:8,11;10:7,13,14, 17;11:15;12:6;13:17, 23;14:2,7,23;15:12; 22:17;28:3;29:14; 30:14	amounts (2) 19:8;29:24	B		classes (4) 16:21;21:12;22:20; 25:9
adjustments (5)	analysis (3) 11:13,17;13:10	back (19) 17:7,10;19:8; 20:16;21:17;23:22; 24:17;28:4,8;29:17; 30:13;31:16,24;32:1; 34:1;36:12;37:3,8;		

clear (1) 27:17	consideration (1) 7:22	customer's (1) 15:8	30:23;32:4	32:11;37:18
clearer (2) 24:12,16	consistent (2) 14:8,17	cut (1) 34:7	discovery (1) 30:22	elsewhere (1) 26:12
close (1) 41:24	contacted (1) 40:20	Cuts (1) 32:7	discuss (1) 37:5	employed (1) 8:13
closing (1) 39:14	contemplated (1) 39:22	D	discussed (2) 20:15;22:5	end (1) 37:9
collected (1) 34:13	continue (1) 33:10		dispute (1) 11:6	endeavor (1) 41:20
column (5) 16:4;22:23;23:23; 27:5,9	continued (2) 32:21;34:22	data (2) 38:15,23	distribution (2) 13:2;26:5	ending (1) 12:16
combines (1) 26:14	controlled (1) 29:13	date (1) 14:4	divided (7) 19:24;20:14;21:3; 31:8,22;33:3;36:4	Energy (12) 5:12,15,19;7:18; 8:14;9:13;11:5,9; 39:15,17;40:21; 41:14
comment (1) 37:16	coordination (1) 7:14	day (1) 17:7	Docket (10) 4:5;10:12;11:7; 14:9;16:23;27:1; 38:14,20,22;39:2	engaged (1) 11:13
Commission (9) 4:14,22,24;11:9; 13:13;39:24;41:1,2,5	corrected (1) 12:18	days (1) 38:22	dockets (4) 26:21;38:12,13; 41:4	entire (1) 22:16
Commissioner (8) 4:4,5;17:30;6,8,12; 33:5;37:11;41:13	corrections (3) 8:2,23;9:22	DE (2) 14:9;26:12	documents (1) 13:5	equal (1) 22:20
Commissioners (2) 30:3,11	co-sponsored (3) 7:24;8:21;9:20	deadline (2) 39:5,8	DOE (6) 11:14;13:10;19:6; 20:3,12;31:3	equate (1) 22:18
Company (19) 5:11;7:9;8:10,14; 9:7;10:12,16;11:12, 19;12:18;13:9,14,22; 14:4,15;18:7,8,21; 40:4	cost (3) 9:12;37:1,1	December (9) 10:22;12:3,17,21; 17:16;18:13;19:16; 20:19;36:15	dollars (1) 21:22	equates (1) 22:17
Company's (6) 7:21;8:18;9:17; 10:6,9;11:17	costs (4) 4:20;18:11;21:1; 34:18	decided (2) 12:13;41:5	doubled (1) 21:14	equivalent (1) 17:11
compared (3) 26:2;32:9;33:23	couple (2) 27:20;38:22	demonstrating (1) 13:6	down (3) 33:15;34:3;35:14	ERICA (5) 6:18,23;8:12; 16:11;35:13
complexity (2) 31:13;33:3	course (1) 39:11	Department (8) 5:15,19;6:4;11:5,9; 39:17;40:21;41:14	duly (1) 6:19	erroneous (1) 36:16
compliance (2) 28:18;29:23	Court (1) 6:20	depending (1) 39:8	during (3) 17:15;18:8;40:5	error (11) 34:16,24;35:5,6,8, 10;36:6,7,11,16; 40:11
complicated (1) 40:17	cover (1) 6:1	design (1) 9:12	E	essentially (2) 18:21;36:3
components (1) 32:8	COVID (6) 18:17;19:1;31:12, 13;35:22;40:18	detailed (1) 23:1		established (1) 24:19
concerning (2) 4:17;30:24	COVID-created (1) 33:2	determined (7) 11:19;18:9,21; 19:10,14;20:2;37:6	earlier (2) 22:7;23:10	evaluate (1) 19:22
concerns (1) 42:4	create (2) 22:4,23	determining (1) 19:2	easily (1) 28:18	evaluated (1) 36:9
concluded (1) 42:8	created (1) 31:13	DEXTER (14) 5:16,18,21;6:3,13; 15:21,22;16:1;30:2,5, 10;39:15,16;41:10	effect (15) 10:13;12:15;16:24; 17:1;20:10,18;21:24; 24:11;25:18;26:1,17; 27:11,15;30:17; 36:14	evaluation (1) 19:6
conducted (1) 11:13	credit (7) 13:20;15:7,10; 16:14,18;21:14; 28:16	dictated (1) 34:19	effective (2) 10:10;19:15	even (1) 17:17
confidence (1) 37:17	cross-examination (3) 15:18,20,24	difference (6) 11:2;12:8;13:1; 16:10;17:9;25:16	effects (1) 12:8	Eversource (10) 5:8,12;7:18;8:14; 9:13;10:20;30:17; 40:15,23;41:11
confirm (1) 21:13	currently (6) 14:14;16:15;23:14; 24:10;25:17;26:1	differences (1) 16:21	effort (1) 40:15	Eversource's (2) 4:6;13:11
confusing (1) 35:16	customer (2) 14:22;15:5	different (2) 21:18;30:18	efforts (1) 40:23	everyone (1) 42:4
confusion (4) 20:4;24:24;25:11; 34:11	customers (9) 15:5;20:2;32:3; 35:1,9;36:24;37:4,7; 39:19	differently (3) 12:10;22:8;32:11	either (3) 21:24;23:3;26:5	exactly (1) 16:8
Connecticut (3) 7:13,17;9:15	customers' (1) 36:5	direct (3) 7:3,6;17:23	electric (1) 7:17	examination (2) 7:3,6
		director (1) 7:12	else (5) 5:24;17:18,20;	example (1) 27:3
		discovered (2)		

Exhibit (21) 5:23;7:19,20,23; 8:3,5,17,17,20,24; 9:2,16,17,19,23;10:1; 26:13,21;38:4,5,8 exhibits (1) 6:1 expect (1) 28:6 expected (1) 35:14 explain (4) 17:24;22:1;23:7,24 explains (1) 21:6 extend (2) 33:1;34:8 extended (5) 33:9,17,18;34:10; 36:3 extension (3) 18:17;19:1;35:22 extra (1) 38:22	32:9 financial (1) 5:2 find (2) 28:6;29:16 findings (1) 11:18 fine (1) 26:24 firm (1) 5:10 first (3) 22:3;33:12;38:11 flipping (1) 29:5 following (1) 4:12 footnote (4) 23:23,24;24:2,12 forth (1) 40:16 forward (1) 21:21 frankly (1) 40:5 full (6) 7:9;8:10;9:7; 12:16;19:18;38:4 further (5) 4:16;15:16;19:6; 37:12;41:3	5:11;7:13,17;8:15; 9:14;31:17 happened (1) 35:22 harmless (1) 37:7 heading (1) 28:2 hearing (16) 4:5,6,12,16;5:4; 11:7;17:7,15;19:4; 20:15;31:23;36:9; 40:6,16;42:1,8 hears (1) 41:5 heater (1) 29:13 Heating (2) 28:2,9 held (4) 4:14;17:7;37:7; 41:2 help (1) 14:4 helpful (2) 30:9;34:14 high (1) 30:13 higher (3) 12:22;13:20;15:9 hindsight (1) 18:5 history (2) 18:4;31:16 hitting (1) 39:7 holding (1) 40:1 holdover (1) 25:1 honest (1) 24:13 hot (1) 17:6 hour (8) 13:20,22;16:19; 22:6,18;24:5;25:3; 28:17 hours (1) 15:6 human (1) 35:10	impact (2) 14:21;15:4 impacted (1) 36:18 impacts (3) 14:5;15:7;26:23 implementation (1) 7:15 important (1) 41:1 included (19) 12:6,24;15:4;19:9; 20:5,22;27:20;28:21; 31:2,5,21,24;32:2,4, 13;33:4;35:11;36:4,8 includes (3) 7:23;8:20;9:19 incorrect (2) 11:21;31:4 increase (1) 22:21 incremental (5) 16:14;23:12,13,18; 24:11 indicated (2) 17:17;35:13 individual (2) 26:19,21 information (1) 41:21 initial (4) 7:21;8:18;9:17; 12:23 intended (2) 25:14,15 intent (3) 33:14,20;34:11 interim (2) 10:16;24:20 interpretation (1) 35:1 interpreted (1) 35:11 interpreting (1) 34:16 INTERROGATORIES (1) 30:11 into (9) 16:20;21:1,9; 27:19;30:17;31:19; 33:8;35:24;40:17 investigate (1) 40:16 investigation (1) 41:3 isolating (2) 26:8,10 issue (9) 13:24;30:22,24; 31:1;40:1,18;41:2, 15;42:6 issues (3) 4:17;11:8;40:2	J January (6) 7:22;8:19;9:18; 18:15;20:11;39:8 Jen (1) 14:24 JENNIFER (3) 6:19;7:1;9:9 Jessica (1) 5:9 Jobs (1) 32:7 joined (1) 4:3 July (17) 4:13,14;10:22; 11:7;12:3,21;13:19; 16:17;17:7,10,14,15; 18:12;19:4,16;20:19; 36:15 June (1) 18:16
F	G	I	K	L
fact (2) 19:22;40:19 factor (3) 19:17;20:20;36:3 factors (1) 32:16 fair (1) 30:19 fairly (3) 17:23;40:11;41:5 falls (1) 27:5 familiar (4) 7:19;8:16;9:16; 17:6 far (1) 31:16 feasible (1) 38:21 February (12) 10:14;13:18;14:2; 16:17,24;25:19;26:1, 3,6;27:11,15;39:7 file (1) 28:18 filed (5) 17:13;26:12,15,18; 41:19 filing (10) 4:23;7:21;8:18; 9:18;11:21;12:23; 15:11;17:14;29:23; 37:19 filings (2) 4:15;7:16 final (1)	gas (1) 7:18 Generally (1) 36:21 gets (2) 21:8;26:15 given (2) 40:24;41:3 gives (1) 39:6 goes (1) 18:1 GOLDNER (20) 4:2,3;5:13,17,20; 6:5,9,14;7:2;15:19, 23;30:4;37:13;38:1, 24;39:3,12;41:9,13, 22 Good (4) 4:2;5:16;7:3;30:1 guess (6) 16:2,6;21:21; 26:24;28:5;29:11 H	ID (1) 38:4 identification (1) 5:24 identified (1) 31:20 illustrative (1) 26:9	Keegan (1) 5:10 keep (2) 35:17,19 kilowatt (9) 13:20,22;15:6; 16:19;22:6,18;24:5; 25:3;28:17 kilowatt-hour (1) 23:3 kind (1) 26:13 known (1) 10:8 kW (1) 23:3 kWh (4) 16:7;21:20,22; 24:22	labeled (1) 16:5 laid (1) 28:6 language (1) 33:9 larger (1) 15:10 last (5) 17:19;22:12;25:1; 26:15;40:1 lastly (1) 27:18 law (1)

5:10 leave (2) 11:10;17:3 led (1) 34:10 left (1) 4:12 leftover (1) 24:2 level (12) 11:3,6,21,23; 30:13;33:11,19,23; 34:3,6,12,23 Line (6) 16:13;17:12;21:15; 23:6,8;30:9 Lines (2) 16:5;21:19 live (2) 4:24;5:4 locked (1) 19:11 look (9) 17:12;18:5;19:8; 20:16,17;32:1;34:1; 40:5,17 looking (4) 24:23;29:2;38:11; 39:9 looks (4) 17:6;28:12;29:6,15 lost (1) 36:24	MBP/ELM/JAU-2 (2) 5:6;13:8 mechanism (2) 4:9;39:23 MENARD (14) 6:19,23;8:1,9,12, 12,20;9:1,4,21;33:5; 34:21,22;35:4 mention (2) 37:19;42:1 mentioned (1) 38:7 methodology (2) 14:17;22:9 middle (1) 28:1 million (35) 10:20;11:1;12:20, 24;17:17;18:1,2,11, 16;19:1,5,13,24;20:8, 8,13,13;21:2;31:2,8, 11,20;32:23;33:14, 19,20,23;34:3,5,6; 35:14,15,21,23;36:2 mind (1) 35:20 mitigate (1) 14:5 mixing (1) 38:12 moment (1) 25:13 month (2) 15:6,8 months (4) 17:1;31:16,18,19 morning (3) 4:3;5:16;38:13 move (3) 7:3;15:20;39:14 moved (1) 35:23 MPB/ELM/JAU-1 (2) 14:10;38:9 MPB/ELM/JAU-2 (1) 14:20 MPB/ELM/JAU-3 (1) 15:3 much (1) 40:14 multiplied (1) 36:2 mute (1) 15:2 myself (2) 15:1;29:10	40:9 need (3) 5:3;6:1;38:22 needed (1) 4:16 negated (1) 12:12 negative (2) 13:21;16:23 New (7) 5:11;7:13,17;8:15; 9:14;29:8;31:17 next (3) 25:22;38:15;42:1 nicely (1) 14:2 nobody (1) 42:3 non-change (1) 27:8 note (2) 4:9,21 noticed (1) 29:5 number (3) 17:24;19:7;23:7 numbers (2) 16:10;40:3	order (5) 4:6,13,21;35:19; 42:6 original (2) 30:22;31:1 originally (2) 17:13;39:22 originated (1) 30:14 origination (1) 30:21 out (3) 27:4;28:6;36:3 outset (1) 38:7 outstanding (1) 14:1 over (4) 17:23;19:18;35:17; 39:20 overall (3) 14:5;22:4;26:23 over-collection (2) 13:16;37:2 over-collections (1) 36:22 over-recovered (1) 10:24 overview (1) 11:17 own (1) 26:11	36:12;37:3 passed (1) 39:19 past (1) 36:19 Paul (1) 5:18 per (15) 13:20;15:6;16:7, 19:21;20,22;22:6,17; 23:3,3;24:5,21;25:2; 28:16;30:18 percentage (1) 22:21 period (33) 10:15,21;12:2,16, 20:13;18;18:12,14, 19,20,24;19:13,16, 19,23;20:18;23:17, 20:24;20;31:12,14, 15,18;32:3,14,22; 35:10,16,18,20;37:9; 39:21,22 periods (1) 35:19 permanent (13) 12:9,11;19:11,14; 20:6,10;30:18;31:6, 7;32:9,12,15;34:19 perpetual (1) 30:24 pertaining (1) 9:11 petition (1) 4:7 piece (4) 23:18;24:11;32:6; 33:11 pieces (2) 33:8;34:4 place (1) 39:22 please (5) 6:16;7:9;8:9;9:6; 11:16 pleased (1) 39:18 plus (2) 24:11;34:5 pm (2) 42:2,9 pointing (1) 27:4 portion (2) 10:23;11:11 position (3) 7:10;8:10;9:7 possible (1) 41:21 prefiled (2) 5:23;6:10 preliminary (2) 5:22;6:6
M		O	P	
makes (1) 37:18 management (27) 4:19;10:23;11:1,5, 11;12:1,7,13,14,19; 13:3,16,24;14:12; 18:10;19:12;20:6,9; 21:1;31:6;32:5,6,21; 33:1,15,18;34:18 manager (2) 8:13;9:10 MARISA (3) 6:18,22;7:11 mark (1) 38:8 marked (3) 7:20;8:17;9:16 math (1) 23:2 matter (3) 16:12;40:17;42:5 matters (2) 5:22;6:6 may (2) 14:5;38:22 MBP/ELM/JAU-1 (2) 5:5;13:7		object (1) 6:10 objection (2) 6:13;38:3 Obviously (1) 15:9 occur (3) 14:6;36:17,22 occurred (2) 18:17;35:5 occurring (2) 4:12;25:21 off (2) 5:4;15:2 off-cycle (2) 4:10;13:23 one (9) 23:5;25:20;26:10, 15;27:22;29:5,8; 37:15;38:14 ones (1) 26:19 only (5) 31:11,16;32:5,6; 33:20 open (5) 4:12,15;11:10; 40:1;41:2 opportunity (2) 37:1;38:16 opposed (1) 18:20	Page (28) 15:11;16:3,3;17:5, 5;21:11,18,21,24; 22:2,5,13,22;23:1,6, 22;25:5,6,22;27:3,21; 28:1,5,8;29:3,12,17; 40:13 pandemic (3) 33:7,17;34:9 panel (3) 6:17;10:5;36:23 papers (1) 5:1 Pardon (1) 24:7 part (3) 8:5;9:2;10:1 particularly (1) 41:3 parties (1) 4:23 PARUTA (27) 6:18,22;7:8,11,11, 23;8:4,7,22;9:21; 10:9,18;11:19;13:7, 14;14:10,24;17:12, 20;18:3;21:4;30:21; 33:12;34:21;35:4;	
	N			
	name (7) 5:17;7:9,11;8:10, 12;9:7,9 necessarily (1)			

premarked (1) 5:23	5:9,9,14;7:4,5,7; 15:16;37:22,23;	7:4;15:21;30:6	remained (2) 34:4,6	right (6) 15:19;21:3,15; 24:22;40:7,9
preparing (1) 19:21	38:10,18;39:1,11; 41:11,12,23	41:8	remaining (1) 39:21	Robidas (1) 6:16
presented (3) 13:9;17:10;39:18	range (1) 15:7	12:18	remains (1) 14:1	role (1) 9:10
presenting (1) 11:14	ratchet (1) 33:15	4:8;10:7;11:22; 28:3;29:14;31:3; 40:19;41:4	reminder (1) 38:6	RRA (35) 10:8,9,13,17,21,24; 11:11;12:23;13:15; 14:14,16;16:13,18; 23:17;14:19;3,21; 20:22;22:12,23; 23:15,18;24:10;25:1, 16,20;26:3,10;31:21; 35:3,5;36:8,17; 39:23;40:19
presently (2) 12:23;13:21	ratcheting (1) 35:14	reconciling (3) 32:16;33:21;35:2	remove (1) 12:7	S
previously (1) 41:19	rate (81) 4:8,9;5:1;9:12; 10:7,8,9,13,17;11:3, 6,14,20,23;12:16; 13:19,21;14:14,16, 16,19;16:15,18,23; 18:18;19:9;21:9,11, 13,13,22;22:4,7,8,13, 20;23:3,4,6,11,13,13, 18,19;24:4,10,20; 25:2,6,17,20;26:3,19; 27:19;28:6,10,11,21; 31:15,18;32:8,14,16, 17,18,22;33:8,9,10, 16,18;34:5,23;35:9, 18;36:11,16;37:4,9; 39:17,20	record (11) 4:9,11,15;5:4; 11:10;18:6;37:20; 38:7,19,21;40:8	rephrase (1) 36:12	
prior (5) 21:24;24:3;38:14, 21;39:2	rated (1) 12:2	records (1) 20:17	reply (1) 38:16	same (3) 5:6;14:4;17:19
pro (1) 12:2	rates (65) 8:15;9:10,12;12:2, 9,11,12,14,24;13:2; 15:13;16:6,7;17:16; 19:12,15,23;20:2,6, 10,17,18;21:2,18,23; 22:3;24:14;25:17,18, 24;26:5,7,7,16,17; 28:5;30:16,18;31:6,7, 24;32:2,5,12,15;33:4; 34:2,3,4,14,19,19; 35:6,8,12,21;36:1,5, 6,14,18;37:9;40:18, 18;41:8	recoupment (3) 4:18;12:5,10	Reporter (1) 6:21	saw (1) 17:19
probably (1) 24:12	reach (1) 41:15	recover (2) 31:11;34:2	represents (1) 13:1	saying (2) 16:22;28:23
proceed (1) 6:15	react (1) 39:4	recovered (5) 13:2;18:10,23; 23:15;35:12	request (9) 4:10;5:1,4;10:6; 13:12;38:7,19,21; 41:18	schedule (9) 17:10,11,13,18,21; 20:22;25:14;35:5; 40:12
process (1) 35:24	reading (1) 24:8	recovery (7) 4:19;5:2,2;11:3,6, 20,23	requested (5) 4:22;13:17;39:5; 41:8,21	schedules (1) 33:22
program (1) 12:19	read (1) 23:23	red (1) 28:22	requesting (2) 13:14,23	schedule's (1) 25:15
proposed (20) 11:14;12:22;14:3, 7;16:9,22;21:9;22:1, 16;23:16;24:14,21; 25:6,19;26:5,17; 27:19;28:11;39:20; 41:16	reading (1) 24:8	red (1) 28:22	requirement (1) 7:15	SCRC (2) 26:7,15
proposes (1) 11:21	reality (1) 24:18	redirect (2) 37:21,23	requirements (3) 7:12;8:13;23:14	second (6) 4:5;27:22;33:11, 13;35:15,20
proposing (5) 10:12,16;26:2,6,20	really (4) 24:16;26:9;27:10; 34:9	redline (1) 37:17	residential (3) 14:22;15:5;21:13	sensible (1) 39:3
provide (5) 4:23;11:16;14:11, 21;41:20	reason (2) 28:12;30:23	Redlined (4) 27:23;28:13,20; 29:21	resolution (1) 41:16	separated (1) 33:8
provided (3) 13:5;15:10;29:8	reasonable (3) 15:13;38:14,19	referring (1) 24:17	resolve (2) 4:16;13:24	Service (3) 5:11;8:14;9:12
Public (1) 5:11	recall (2) 17:8;31:17	reflect (4) 11:22;26:4;29:23; 32:15	respect (2) 10:6;11:10	set (1) 23:17
purposes (2) 26:9;35:2	recognize (3) 17:8;31:17	reflected (1) 19:23	response (1) 11:8	setting (1) 23:19
purported (2) 10:10,18		reflective (1) 27:4	response] (3) 6:2,8,12	settlement (22) 4:17;10:11,19; 12:5;14:9;18:8,14,18, 19,24;19:11,15; 22:10;30:19;31:18; 32:9,10,17,20,23; 34:12,20
put (4) 30:17;33:21;40:15, 23		refund (6) 12:19,22;13:6,8, 15;40:22	responsibilities (3) 7:10;8:11;9:8	sheet (2) 21:19;29:2
Q		refunded (1) 10:20	responsible (3) 7:14;8:15;9:11	shortly (1) 16:21
quickly (4) 17:23;39:4;41:6,21		regarding (2) 6:1;36:23	result (3) 15:12;18:24;20:20	show (8) 25:5,14,16,23; 26:19,22;28:15,22
R		regroup (1) 42:3	resulting (2) 4:11;18:18	
raised (2) 11:8;40:2		regulatory (5) 4:8;7:16;10:7; 28:3;29:14	results (1) 25:8	
raising (1) 41:14		related (1) 10:22	retail (1) 24:15	
RALSTON (16)		relating (1) 5:1	revenue (4) 7:12,15;8:13;23:14	
		released (1) 38:2	revenues (3) 22:18,21,22	
			reviewed (3) 17:14;19:4;36:9	
			revised (4) 11:22;13:6,8;14:11	

showing (2) 24:9;29:6	subject (1) 29:1	Thanks (1) 23:21	type (1) 32:16	34:13
shown (2) 14:20;27:8	submitted (4) 7:21;8:18;9:18; 19:3	thinking (1) 33:22	typical (1) 32:15	W
shows (9) 13:8;21:7;22:13; 23:1;25:7,7,24;40:8, 12	subsequent (1) 18:13	third (8) 18:23;19:23;27:1; 31:12,14;32:3;33:2; 35:24	typically (1) 31:15	walk (1) 18:3
significant (1) 40:11	subsidiaries (2) 7:18;9:14	thought (2) 24:19;35:23	U	Water (3) 28:2,9;29:13
simply (4) 19:24;36:1,6;41:18	summarize (2) 10:5;13:11	thoughts (1) 36:23	ULLRAM (33) 6:19;7:1;8:1,21; 9:6,9,9,19,24;10:3; 15:1,14;16:11;17:2; 21:16;22:2;23:11; 24:2,7,23;25:10,15, 24;27:7,13,16,22,24; 28:12,24;29:4,18,20	way (2) 35:22;36:1
Simpson (8) 4:4;5:17;30:7,8,12; 33:5;37:11;41:13	summer (5) 17:19;36:10,19; 40:1,6	three (2) 21:18,23	ultimately (6) 20:1;30:23;34:15; 36:7,18;37:5	Wednesday (1) 39:2
six (1) 17:1	supply (1) 26:7	Thursday (1) 39:2	Uncontrolled (2) 28:2,9	week (1) 38:15
six-month (8) 10:15,21;12:20; 13:18;18:14;35:16, 19,20	support (1) 39:20	tie (1) 25:5	under (3) 7:22;28:1;42:5	welcomed (1) 40:4
size (1) 21:14	supports (1) 39:17	timeline (1) 38:17	unfortunately (1) 5:3	weren't (2) 29:21;40:8
somewhat (1) 34:15	Sure (10) 11:19;18:3;22:2; 28:14,19;29:20; 35:18;38:20,24,24	times (2) 19:17;20:20	up (6) 21:7;24:21;27:17; 28:22;29:12;40:12	Werlin (1) 5:10
sooner (2) 39:6,9	swear (1) 6:16	today (9) 4:5;7:22;8:6;9:3; 10:2,6;13:13;27:1; 41:16	update (1) 29:22	what's (4) 16:9,22;17:9;18:5
Sorry (4) 15:1;24:7,24;29:10	sworn (8) 6:7,20,22,23;7:1; 8:6;9:3;10:2	together (1) 33:21	Upon (2) 19:6;22:9	WHEREUPON (2) 6:18;42:8
sounds (1) 30:16	system (1) 27:14	took (5) 19:8;20:16,17; 31:22;36:1	usage (1) 15:9	whole (1) 36:24
speaking (1) 36:21	systems (2) 27:9,10	top (1) 16:14	used (6) 11:2,20,24;14:18; 19:2;36:7	within (16) 11:3;17:14;19:9, 14;31:2,21;32:13,19; 35:5,6,8,9,21,23; 37:4,8
specific (1) 12:6	T	total (7) 14:15;16:16;18:11; 22:24;23:11,17,19	using (2) 20:19;22:20	Without (1) 38:3
specifically (2) 4:22;12:15	talked (2) 21:8,20	transition (1) 34:18	V	witnesses (9) 6:7,10,15,17; 15:17;16:4;17:8; 37:21;38:2
spend (4) 11:5;33:10,20,24	talking (4) 23:9,10;29:11,12	translated (1) 21:8	variance (1) 14:12	wonder (1) 37:18
spending (4) 13:4;33:15,19; 34:13	target (2) 22:23,24	treated (1) 32:10	various (1) 21:12	work (1) 5:1
spreadsheets (2) 4:24;5:5	tariff (2) 27:19;28:19	tripping (1) 35:17	veg (2) 32:5,6	working (1) 41:15
Staff (6) 11:14;13:10;19:7; 20:3,12;31:3	Tax (1) 32:7	truly (1) 20:22	vegetation (25) 4:19;10:23,24; 11:4,11;12:1,7,12,14, 19;13:3,16,24;14:12; 18:10;19:12;20:6,9; 21:1;31:6;32:20,24; 33:15,18;34:17	wrong (2) 37:17,18
start (4) 5:3;7:8;16:2;42:1	temp (10) 33:8,9,10,16,17; 34:5,11,18,23;40:18	trunk (6) 18:23;19:23;31:12; 32:3;33:2;35:24	verbal (3) 6:2,8,12	Y
starting (2) 21:12;25:13	temporary (26) 12:2,9,11,14,16; 18:8,14,18,19,24; 30:16;31:15,18;32:5, 8,12,14,18,19,22; 34:4;35:6,9,17,21; 36:14	trying (2) 25:4;35:18	verify (1) 38:23	year (5) 14:13;33:11,13,14; 37:4
state (3) 7:9;8:9;9:6	terms (7) 10:18;13:12;14:8; 20:5;34:16;36:24; 39:4	Tuesday (3) 38:15,19,20	version (1) 27:23	year's (1) 22:12
stated (1) 41:19	testimony (8) 4:15;6:11;7:23;8:6, 21;9:3,20;10:2	turn (2) 17:5;21:10	versus (1)	Yup (1) 25:24
statements (1) 40:5		turned (1) 31:19		Z
stay (2) 12:15;16:24		turning (1) 16:2		zero (2) 29:15,16
Step (3) 14:18,19;22:11		two (11) 16:6,6,10,17; 19:24;21:3;32:8; 33:8;34:4,7;38:11		0
strike (1) 38:3				

0.23 (1) 16:7	18 (1) 31:19		23:9	
0.35 (2) 16:7;24:21	18-month (4) 18:19;19:19;32:22; 35:17	3	854,000 (1) 23:8	
00 (1) 24:4	19-057 (3) 10:12,20;14:9	3 (1) 38:9	9	
00009 (1) 28:10	19-117 (1) 42:2	3.482 (1) 11:1	9 (2) 16:5;21:19	
00018 (2) 28:10,11	1st (9) 16:17,24;25:18,19; 26:1,3,6;27:11;39:7	30 (1) 18:16		
009 (2) 28:16,16		30th (1) 4:14		
011 (1) 24:8	2	31 (7) 12:3,17;13:19; 18:13;19:16;20:19; 36:15		
012 (3) 13:21;16:16;24:4	2 (8) 14:11,19;20:14; 31:8,22;33:3;36:4; 38:9	4		
016 (2) 29:7,15	20 (6) 16:3;21:18;22:2,5; 24:21;25:5	4.332 (1) 12:24		
018 (2) 28:4,17	2019 (5) 18:12,13;19:16; 20:19;36:15	4th (3) 7:22;8:19;9:18		
023 (1) 13:19	2020 (12) 10:22;12:3,3,17, 21:14;13;17:16; 18:15,16;19:17; 20:19;36:15	5		
032 (2) 29:9,18	2021 (8) 4:13,14;10:10; 11:7;20:11;25:18; 26:2;27:15	55 (2) 27:21;29:12		
035 (5) 16:19,24;22:5,17; 25:2	2022 (8) 10:14;13:18,19; 14:2;16:17;25:19; 26:3;27:11	550 (1) 15:5		
1	21 (2) 16:3;21:7	57 (1) 29:3		
1 (14) 10:10,14;12:3; 13:18;14:2,18;18:12, 15:19;16;20:11,19; 21:15;36:15;42:2	21-029 (1) 4:5	6		
1,764,000 (1) 23:8	21-117 (1) 26:12	6 (9) 18:1,2;20:7,13; 33:14;34:5;35:15,21, 23		
1.5 (3) 19:17;20:20;36:2	22 (2) 17:5;40:13	6,550,000 (3) 20:14;31:9,22		
10 (13) 5:23;7:20,23;8:3,5, 17,20,24;9:2,17,23; 10:1;38:4	23 (8) 21:11,21;23:22; 25:6;28:5,8,15;29:17	6,850,000 (4) 20:23,24;33:4;36:5		
11 (2) 15:8;38:8	24th (1) 39:8	600 (1) 15:6		
12 (2) 31:16,18	25 (4) 22:13,15;23:6; 24:17	650 (1) 15:6		
12:26 (1) 42:9	26 (2) 23:1;24:17	6850 (1) 17:16		
12-month (2) 18:20;19:13	26,503 (2) 4:13,22	7		
13 (2) 23:6,8	27 (3) 15:11;25:12,13	7 (1) 17:12		
13.1 (4) 20:8,13;31:8,19	28 (3) 25:12,22;27:3	7.7 (2) 33:13;34:5		
13.7 (10) 19:13,17,24;20:20; 21:2;32:23;33:3; 34:9;36:2,4		8		
16 (1) 11:7		8 (4) 15:7;16:5,13;21:19		
16th (1) 4:13		850 (1) 23:12		
		850,000 (1)		