1		STATE OF NEW HAMPSHIRE
2		PUBLIC UTILITIES COMMISSION
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4	21 South Frui Suite 10	23 - 1:42 p.m. It Street
5	Concord, NH	
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7	RE:	DE 23-004
8		PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY:
9		Proposed Purchase of Receivables Program. (Prehearing conference)
10		
11	PRESENT:	Chairman Daniel C. Goldner, Presiding Commissioner Pradip K. Chattopadhyay
12		Commissioner Carleton B. Simpson
13		Eric Wind , Esq./PUC Legal Advisor
14		Tracey Russo, Clerk
15	APPEARANCES:	Reptg. Public Service Company of New Hampshire d/b/a Eversource Energy:
16		David K. Wiesner, Esq.
17		Reptg. Community Power Coalition of New Hampshire:
18		Clifton Below, Chair
19		Reptg. New Hampshire Dept. of Energy: Matthew C. Young, Esq.
20		Alexandra K. Ladwig, Esq. Amanda Noonan, Dir./Consumer Division
21		Elizabeth Nixon, Dir./Electric Division (Regulatory Support Division)
22		(negatatory bapport Division)
23	Court Rep	orter: Steven E. Patnaude, LCR No. 52
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INDEX PAGE NO. STATEMENTS OF PRELIMINARY POSITION BY: Mr. Wiesner Mr. Young Mr. Below QUESTIONS/STATEMENTS BY: Cmsr. Simpson Cmsr. Chattopadhyay 18 Chairman Goldner DISCUSSION RE: PROCEDURAL SCHEDULE

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	PROCEEDING	
2	CHAIRMAN GOLDNER: Okay. We are here	
3	this afternoon in Docket DE 23-004, in which the	
4	Commission has docketed Public Service Company of	
5	New Hampshire, doing business as Eversource,	
6	Proposed Purchase of Receivables Program, a	
7	component facilitating retail electric service	
8	sales, required by RSA 53-E:9 and Administrative	
9	Rule Puc 2205.16.	
10	We will hear preliminary positions from	
11	the parties on Eversource's Proposal, as well as	
12	address the development of a procedural schedule	
13	today.	
14	First, let's take appearances,	
15	beginning with Eversource.	
16	MR. WIESNER: Good afternoon, Mr.	
17	Chairman, Commissioners. I'm David Wiesner,	
18	representing Public Service Company of New	
19	Hampshire, doing business as Eversource Energy.	
20	And, yes, you heard that correctly.	
21	CHAIRMAN GOLDNER: Welcome back,	
22	Mr. Wiesner.	
23	MR. WIESNER: Thank you. It's good to	
24	be back.	

1 CMSR. SIMPSON: Nice to see you. 2 MR. WIESNER: With me today is a team of our experts, although not perhaps the full 3 4 complement that we might have brought: Our 5 witness, Brendan O'Brien, of the Accounting 6 Department; Daryush Donyavi, of the -- who works 7 with suppliers for the Company; Sandra Gagnon, of 8 Regulatory Affairs; and Helen Gagnon, of our IT 9 Department. 10 CHAIRMAN GOLDNER: Very good. Very 11 And the Department of Energy? qood. 12 MR. YOUNG: Good afternoon, 13 Commissioners. This is Matthew Young, appearing 14 on behalf of the Department of Energy. And with 15 me today is Alexandra Ladwig, who's serving as 16 co-counsel. With us today is also Amanda Noonan, 17 who is the Director of Consumer Services; and Liz 18 Nixon, who is the Director of the Electric 19 Division. 20 CHAIRMAN GOLDNER: Very good. And the 21 Community Power Coalition of New Hampshire? 2.2 MR. BELOW: Good afternoon, 23 Commissioners. Clifton Below, on behalf of the 24 Coalition.

1 Thank you. 2 CHAIRMAN GOLDNER: Thank you. At the 3 outset, the Community Power Coalition of New 4 Hampshire and the NRG Retail Companies submitted 5 a timely Petition to Intervene, neither of which 6 were objected to. 7 Does anyone have anything further to say with respect to either of these Petitions to 8 Intervene? 9 10 MR. WIESNER: We have no objection to 11 either intervention, Mr. Chairman. 12 CHAIRMAN GOLDNER: Thank you. So, we 13 have reviewed and determined that the Community 14 Power Coalition of New Hampshire and the NRG 15 Retail Companies' intervention would be in the 16 interest of justice, and would not impair the 17 orderly and prompt conduct of the proceedings, 18 and therefore grant intervention pursuant to Puc 19 203.17 and RSA 541-A:32, II. 20 Are there any other matters that need to be raised before we take preliminary 21 2.2 positions? 23 [No verbal response.] 24 CHAIRMAN GOLDNER: Okay. Seeing none.

1 Let's turn to the Proposal. We'll plan to hear 2 positions on Eversource's Purchase of Receivables 3 Program, and the Commission may have some 4 follow-up questions. And we'll begin with 5 Eversource. 6 MR. WIESNER: Thank you, Mr. Chairman. 7 I was going to reference "Ground Hog Day", but 8 you beat me to it. 9 So, in this docket, Eversource has 10 proposed a Purchase of Receivables Program in 11 compliance with RSA 53-E:9 and the Commission's 12 rules at Puc 2205.16(e). 13 The Company's POR Program leverages our 14 experience with affiliates in Massachusetts and 15 Connecticut, and will apply to all competitive 16 suppliers using consolidated billing services, 17 including those not serving community power 18 aggregations, and, as well, the aggregations 19 themselves, when they are acting as load-serving 20 entities. 21 Consistent with current practices in 2.2 Connecticut and Western Massachusetts, payments 23 will be made to suppliers on a monthly basis, with the payment amount calculated with reference 24

1 to the supplier's portion of accounts receivable 2 and the applicable discount rate. 3 The proposed discount rate of 1.066 4 percent is based on an Uncollectible Expense 5 Factor and a three-year amortization of the 6 estimated incremental costs associated with POR 7 Program implementation in New Hampshire. At this 8 time, the Company anticipates it will not incur incremental costs to administer collection 9 10 efforts under the POR Program, and, therefore, no 11 related administrative costs have been included 12 in the proposed discount rate. The discount rate 13 will be recalculated on an annual basis, subject 14 to Commission approval. 15 Now, Eversource is proposing to use a 16 single discount rate for all supplier accounts 17 receivable regardless of the customer rate class. 18 The Company did not consider proposing discount 19 rates that differed by class, because that would 20 require significant modifications to its two very 21 different legacy billing systems. 2.2 Due to the need to accommodate those 23 two different systems, the Company determined 24 that the potential benefits would be outweighed

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1 by the additional costs associated with system 2 upgrades required to facilitate multiple discount 3 rates. 4 It's currently estimated that an 5 eight-month development and transition period 6 will be required to implement the proposed POR 7 Program in the state, and that the related system upgrade costs will total approximately \$1.9 8 million. 9 10 Importantly, Eversource proposes to 11 extend the POR Program to cover suppliers' 12 existing receivables as of the time of Program 13 implementation, as well as their receivables 14 going forward, with the existing receivables 15 purchased subject to an appropriate discount 16 rate. 17 Finally, certain details related to the 18 POR Program will be covered in revised tariff 19 provisions that will be submitted as part of a 20 compliance filing following Commission approval, 21 if granted. 2.2 We look forward to working with the DOE 23 and other parties to clarify and further develop, 24 if necessary, the record in this proceeding to

1 support Commission approval of the Company's POR 2 Program. 3 To that end, we've circulated a 4 proposed procedural schedule, which we expect 5 will be discussed during the technical session to 6 follow. That draft procedural schedule proposes 7 that a hearing would be held in mid-June, 8 although it seems that there may be interest in postponing that until the following month. 9 10 So, that concludes my initial comments. 11 And we would be happy to address any clarifying 12 questions at this time. 13 Thank you. 14 CHAIRMAN GOLDNER: Thank you. Let's 15 move to the Department of Energy. 16 MR. YOUNG: Thank you, Mr. Chairman. 17 At this stage, the Department has 18 reviewed the filing. And we look forward to 19 working with the Company and to address relevant 20 questions and clarify the factual context for the 21 record. 2.2 We do appreciate the Company proposing 23 a procedural schedule. However, we do have some 24 concerns that we will endeavor to iron out in the

1 technical session to follow. 2 Thanks. 3 CHAIRMAN GOLDNER: Thank you. And the 4 Community Power Coalition of New Hampshire. 5 MR. BELOW: Thank you. 6 Obviously, the same concern, although I 7 think I heard Attorney Wiesner just address that, 8 by indicating they would be proposing agreements, 9 appropriate agreements and/or tariffs appropriate 10 to both community power aggregation serving as an 11 LSE, as well as for competitive electric power 12 suppliers. 13 The other sort of elephant in the room is the 1.9 million estimated cost, it's four 14 15 times Liberty, 340 times Unitil, even though 16 Eversource already operates a POR on its other 17 systems. And one has to start to wonder at what 18 point very large expenditures for pretty simple 19 math calculations, I mean, they presented 20 illustrated math calculations on a single sheet 21 of paper, why that costs so much money? 2.2 And you have to wonder if legacy 23 systems that are, as I understand it, perhaps 30 24 years old or more, it wouldn't be more prudent to

1 update to a 21st century billing system that 2 could be modified at a more reasonable cost? 3 CHAIRMAN GOLDNER: Thank you, Mr. 4 Below. I think their quote on a new system was 5 "100 million". So, I'm not sure that's the 6 answer we're looking for. But that is a good 7 point, and one that we'd like to probe on further. 8 9 Let's move to Commissioner questions, 10 and beginning with Commissioner Simpson. 11 CMSR. SIMPSON: Thank you. 12 And I'll continue on that topic, 13 because it appears that the Company's affiliate 14 has a system that is capable of offering POR. 15 So, I'm curious to understand, and to confirm, 16 first off, is the Company using a different 17 billing/customer management system in 18 Massachusetts and Connecticut than they are in 19 New Hampshire? 20 MR. WIESNER: There are, this is my 21 understanding, there are different systems in 2.2 place for different utilities in different parts 23 of the Company. And, in particular, in New 24 Hampshire, there is the quite old Large Power

1 Billing system that is still in use. And, as a 2 result, there are two billing systems that need 3 to be modified in order to accommodate POR in New 4 Hampshire. And at least my understanding is 5 that's not the case in Massachusetts or 6 Connecticut. 7 CMSR. SIMPSON: And can anybody just 8 elaborate on a higher level strategy to integrate 9 these operating companies on single IT systems? 10 There is an initiative MR. WIESNER: 11 that is heading in that direction. It is several 12 years away. And I'm not really in a position 13 today to speak more definitively toward that 14 initiative or its timing or potential cost. 15 CMSR. SIMPSON: Okay. I mean, I would 16 say, as a general matter, it seems like we hear a 17 similar issue arise in other proceedings with 18 respect to other initiatives that are 19 data-driven. And I'm eager to hear from the 20 Company on a corporatewide strategy to update 21 customer-facing and customer systems that integrate with metering, integrate with EDI, 2.2 23 integrate with, you know, demand-side systems. 24 So, it certainly is a concern of mine

1 to see the estimated cost just to update a legacy 2 system for this Proposal. So, as we continue on 3 in this proceeding, I'll look forward to hearing 4 more about that strategy. And I expect to hear 5 more from the Company as we continue in this 6 docket. And I encourage the Company to weave 7 those concepts into our dockets before the Commission moving forward. 8 9 MR. WIESNER: We do understand the 10 concern. Thank you. 11 CMSR. SIMPSON: Thank you. 12 I asked Liberty a question about "How 13 the Company will interface with customers served 14 by competitive electricity suppliers and 15 aggregators?" Will that -- are you aware of how 16 customers will be paid? Will it be through EDI? 17 Will it be through the billing system? Something 18 else? 19 MR. WIESNER: When we say "customers", 20 I think you mean "suppliers", Commissioner 21 Simpson, is that right? 2.2 CMSR. SIMPSON: Yes. How will the 23 payments to suppliers and aggregators be 24 facilitated?

1 MR. DONYAVI: This is Daryush, --2 CMSR. SIMPSON: Thank you. 3 MR. DONYAVI: -- with Supply Services. 4 Is this on? 5 CMSR. SIMPSON: Yes, it is. 6 MR. DONYAVI: So, in the Proposal that 7 we have, suppliers would get 810 transactions, 8 they would get --9 [Court reporter interruption.] MR. DONYAVI: -- EDI 810 transactions. 10 11 So, they would be able to -- they would be able 12 to see what the usage is and what the 13 kilowatt-hours are, so they'd be able to shadow 14 bill. And then, when we make the payment, they 15 would get a payment detail, similar to what we do 16 in Connecticut and Massachusetts -- and Western 17 Massachusetts, that would tie back the payment to 18 each account with the usage, allowing them to tie 19 back the payment. 20 CMSR. SIMPSON: So, you mentioned 21 "Western Massachusetts", so, former "WMECo", it 2.2 sounds like they have a system that you're 23 leveraging for part of this process? 24 MR. DONYAVI: Connecticut and Western

1 Massachusetts is similar, yes. 2 CMSR. SIMPSON: And elaborate a bit 3 more on that for us. Just help us understand 4 what that system is, how you're leveraging it, 5 within the context of this Proposal for New 6 Hampshire? And then, what do you need to do to 7 tie that output to your New Hampshire system? 8 MR. DONYAVI: I can't speak to the 9 actual, like, CIS systems. But, from the EDI 810 10 that goes out to the suppliers, it's similar in 11 Western Massachusetts and in Connecticut. The 12 suppliers would get the 810 transactions, but 13 their payment would be a wire once a month, and 14 they would also get, when they request it from 15 us, their payment detail from my team, which 16 would tie back that payment to each account, with 17 the usage, et cetera, et cetera. And we propose 18 to do a similar method here in New Hampshire. 19 But, as far as the actual CIS system, I 20 can't speak to that, unfortunately. I know, in New Hampshire, as Attorney 21 2.2 Wiesner said, we have two systems. We have an 23 LPB system, which is only in New Hampshire, and 24 then there's also a C2 system, so the similar

1 system to the other two states. But there's a 2 stand-alone, complete separate system in New 3 Hampshire, as Dave mentioned. 4 CMSR. SIMPSON: And what part of your 5 customer base does that stand-alone system serve? 6 MR. DONYAVI: That I don't know. 7 CHAIRMAN GOLDNER: Do any of the 8 witnesses here today have any insight into that? MR. O'BRIEN: Yes. 9 This is Brendan 10 O'Brien. That system, Large Power Billing, 11 usually serves -- primarily serves the larger 12 commercial/industrial-type customers. 13 CMSR. SIMPSON: Okay. So, your large 14 C&I customers in New Hampshire, they have a 15 unique system. And then, your residential 16 customers, they're in an enterprisewide system? 17 MR. O'BRIEN: "Enterprisewide", meaning 18 "serving multiple utilities in different 19 jurisdictions"? 20 CMSR. SIMPSON: Yes. 21 MR. O'BRIEN: Yes. Yes. So, that the C2 system is serving other jurisdictions as well, 2.2 23 and primarily oversees the residential customers. 24 CMSR. SIMPSON: Okay. And what is

1 driving the cost estimate? What are the key 2 system or systems challenges that you face that 3 are so costly? 4 MS. H. GAGNON: Hi. I'm Helen Gagnon. 5 CMSR. SIMPSON: Hello. 6 MS. H. GAGNON: I'm from IT. So, for 7 New Hampshire, as he explained, there are 8 separate stand-alone billing systems. The older one, it's called "New Hampshire LPB", was written 9 10 about 1980ish. It's about 38 years old. And 11 then, the other one, the C2 system, is used by 12 other operating companies, but they're completely 13 stand-alone and separate. So, it's double the 14 programming, and the platforms are completely different. 15 16 The older one is a very old mainframe 17 system, requiring a special skillset to do that 18 programming. And we can't leverage anything in 19 that older system. But we can leverage some 20 processing in the 15ish year-old system from 21 WMECo and CL&P. 2.2 So, I don't know if that helps? 23 CMSR. SIMPSON: Yes, that's helpful. 24 Okay. I don't think I have anything

1 further at this time. Thank you. CHAIRMAN GOLDNER: Commissioner 2 3 Chattopadhyay. 4 CMSR. CHATTOPADHYAY: So, before I lose 5 track, I will stick with what we were talking 6 about just now. 7 And I'll use the terms "old system" and the "new system". So, please confirm my 8 understanding that, when you talk about the new 9 10 system, that system is more about the residential 11 customers, right? 12 MR. WIESNER: The C2 system serves 13 residential customers. "New" is a relative term, 14 but it is certainly newer. 15 CMSR. CHATTOPADHYAY: Let's say 15 16 years is long enough that I consider that to be 17 "new". Just kidding. 18 [Laughter.] 19 CMSR. CHATTOPADHYAY: So, this cost 20 estimate you have, can you confirm that that's 21 largely driven by the replacement of the old 2.2 system? 23 MR. WIESNER: This is not a replacement These are modifications to the 24 of either system.

1 two existing systems. And I, personally, don't 2 have the details on what all is involved, or how 3 the costs align with the two different systems. 4 Ms. Gagnon may have more information 5 for you. 6 CMSR. CHATTOPADHYAY: Please. 7 MS. H. GAGNON: So, the cost estimate 8 was developed as a project cost estimate. So, it's a high-level order of magnitude estimate, 9 10 with those separate efforts, separate technical 11 skills, to deliver the Purchase of Receivables. 12 And, of course, again, New Hampshire 13 Large Power Billing system, this skillset is a 14 little more involved, because it's very old 15 technologies. 16 And also, as far as the estimate being 17 the high-level order of magnitude, it's managed 18 as a project. So, you know, there is incremental 19 resources, like a project manager, with a life 20 cycle of the project, that eight-month time 21 period, in addition to contingency. So, again, 2.2 the estimate is a high-level order of magnitude capital project estimate for two separate 23 24 systems.

1 CMSR. CHATTOPADHYAY: Understood. But 2 what I'm trying to get at is, again, sticking to 3 that earlier classification, "old system" versus 4 "new system", the old system is the one where you 5 have to make more changes? 6 MS. H. GAGNON: Right. It's brand-new 7 There's nothing we can leverage. We do code. not have a Purchase of Receivables. 8 CMSR. CHATTOPADHYAY: And that is 9 10 exclusively non-residential? 11 MS. H. GAGNON: Yes. Basically, it's 12 the commercial and industrial, but also municipal 13 streetlights are in that older 38 year-old 14 system. 15 CMSR. CHATTOPADHYAY: Okav. 16 The overall discount, can you confirm, 17 if I -- I think it was mentioned it's "1.066 18 percent", illustratively? 19 [Mr. O'Brien indicating in the 20 affirmative.] 21 CMSR. CHATTOPADHYAY: Is that correct? 2.2 MR. O'BRIEN: Sorry. Yes, that's 23 correct. 24 CMSR. CHATTOPADHYAY: But you wouldn't

1 know right now, given the prior discussion I'm 2 having about how this is driven by perhaps 3 largely improving the old system to accommodate 4 PORs, the percentage here may be actually very 5 different for different classes, if you were 6 applying, you know, a class-based allocation? 7 In terms of the C2 newer MR. O'BRIEN: 8 system being where the residential customers lie, there are also commercial and industrial 9 10 customers that are included in that system as 11 But it's not all of them. well. They're, 12 obviously, split between the two. So, it's not a 13 complete distinction system-by-system, by class 14 of customers. 15 But, from a residential perspective, if 16 I'm interpreting the question right, it's 17 exclusively in the C2 system to evaluate that 18 cost difference. 19 CMSR. CHATTOPADHYAY: Can you -- of 20 course, this is all illustrative. Can you give 21 me a sense of, if you were able to do it, if you 2.2 had the discounts being different for commercial 23 customers and residential customers, can you tell 24 me what that would be for the residential

1 customers, relative to the commercial customers? 2 Would it be significantly lower? 3 MR. O'BRIEN: In terms of in totality? 4 CMSR. CHATTOPADHYAY: Yes. 5 MR. O'BRIEN: Or specific to the cost 6 of the system upgrades? 7 CMSR. CHATTOPADHYAY: No. Since you've translated that, and you've looked at the 8 discount rate as well, I'm just -- I'm more 9 10 focused on the discount rate. 11 Sure. So, one of the MR. O'BRIEN: 12 complications, and probably the key complication 13 in breaking that down, is from an uncollectible 14 expense perspective. We do not currently have 15 the data broken down at that level by individual 16 customer class. And, also, as mentioned in the 17 initial filing, there is also a complication --18 just there would be additional costs, in terms of 19 the older system, to break that data down in a 20 more fine level of detail to be able to 21 distinguish discount rates at that individual 2.2 level. And we felt that the benefits outweigh 23 the costs of incurring that, to break that data 24 down to split by class.

1 CMSR. CHATTOPADHYAY: Do you have PORs 2 in other jurisdictions, non-New Hampshire? 3 MR. O'BRIEN: Yes. We do. 4 CMSR. CHATTOPADHYAY: Do you track the 5 uncollectible percentage differently for 6 different classes in the other states? 7 MR. O'BRIEN: I'd have to confirm. I'm 8 not exactly sure if we do, off the top of my 9 head. But we could confirm with our Regulatory 10 team, I'm sure, unless someone else on the panel 11 would know that answer. 12 CMSR. CHATTOPADHYAY: Okay. I think 13 that's all I have for now. 14 CHAIRMAN GOLDNER: My question is 15 actually for Mr. Below. 16 You've heard a lot today. And I'm just 17 a little baffled, I know you have a lot of 18 experience in this area. On the one hand, we 19 have answers that are "\$5,000, and we need to do 20 some testing, and don't worry." And then, 21 there's another answer that says "It's \$1.9 2.2 million, and we have to adjust all these things, 23 and EDI systems, and billing systems, and all 24 these things."

1 And I just thought it might be helpful 2 to get your perspective? 3 MR. BELOW: Okay. I guess I'm just 4 somewhat also baffled by that cost estimate. And 5 do wonder, like Commissioner Chattopadhyay, how 6 that splits between the two systems? And, if 7 it's predominantly for this much older system 8 that is -- if that happens to be the case, then it sort of makes me wonder if, for those larger 9 10 C&I accounts, if the whole thing is worth it? 11 Maybe it makes sense just to do it for the 12 residential and whatever small commercial 13 customers are in the C2 system. 14 But I thought I would perhaps explore 15 that through discovery questions with the 16 utility. I think that's one thought I had. 17 I mean, obviously, Eversource has a 18 much larger customer base to spread these costs 19 So, in their illustrative example, the over. 20 ACP, the Administrative Cost Percentage, is 21 roughly half of the uncollectibles, unlike 2.2 Liberty, where it's much more. 23 I do know that, obviously, we have 24 factored into our own financial projections a

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loss rate. But the advantage of POR is that it provides predictability to that revenue stream, knowing -- although, you know, just on an annual basis, but that's certainly reasonable for it to reconcile itself. So, I guess those are some preliminary thoughts on your question. Thank you. CHAIRMAN GOLDNER: Thank you. Commissioners, any other questions? [Cmsr. Simpson and Cmsr. Chattopadhyay indicating in the negative.] CHAIRMAN GOLDNER: Okay. Okay. Lastly, on the topic of the procedural schedule, I'll start again by commenting that, although three PHCs are being held in sequence, we don't anticipate each procedural schedule necessarily being identical, and that any necessary hearings will be individually scheduled. With that said, we brought all three electric utilities in at the same time, so that the Commission and parties could effectively use their time to develop procedural schedules that can complement each

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other to the extent possible.

1 Do the parties have any comments for 2 the Commission on establishing a procedural 3 schedule to govern the remainder of this 4 proceeding? 5 Or is it acceptable to discuss this in 6 technical session following these PHCs and get 7 back to the commission with a proposal? MR. WIESNER: I think it's our 8 9 preference to discuss it with the parties during 10 the technical session, and then propose a 11 procedural schedule for the Commission's 12 approval. 13 CHAIRMAN GOLDNER: Okay. I'll note for 14 the record Attorney Young shook his head in the vertical direction. So, I think that is a "yes". 15 16 And Mr. Below didn't shake his head "no", so that 17 all seems promising. 18 Okay. Is there anything else that we 19 need to cover today? 20 [No verbal response.] 21 CHAIRMAN GOLDNER: All right. Very 2.2 good. 23 This prehearing conference in Docket DE 24 23-004 is concluded. We are adjourned. Thank

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1	you.	
2		(Whereupon this prehearing conference
3		in DE 23-004 was adjourned at
4		2:09 p.m., and a technical session was
5		held thereafter.)
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