# In Re: <br> DE 10-188 <br> 2011 CORE ELECTRIC PROGRAMS 

## DAY 1 - MIDAFTERNOON SESSION ONLY June 6, 2012

SUSAN J. ROBIDAS, LCR
(603) 622-0068 shortrptr@comcast.net


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| STATE OF NEW HAMPSHIRE <br> PUBLIC UTILITIES COMMISSION <br> June 6, 2012 - 2:25 p.m. <br> DAY 1 <br> Concord, New Hampshire <br> MIDAFTERNOON SESSION <br> RE: <br> DE 10-188 <br> 2011 CORE ELECTRIC PROGRAMS AND NATURAL GAS ENERGY EFFICIENCY PROGRAMS: <br> Energy Efficiency Programs <br> PRESENT: <br> Chairman Amy L. Ignatius, Presiding <br> Commissioner Michael D. Harrington <br> Commissioner Robert R. Scott <br> Sandy Deno - Clerk <br> APPEARANCES: <br> Reptg. Public Service Co. of N.H.: Gerald M. Eaton, Esq. <br> Reptg. Unitil Energy Systems and Northern Utilities: <br> Rachel A. Goldwasser, Esq. (Orr \& Reno) <br> Reptg. Granite State Electric Co., D/b/a National Grid and EnergyNorth Natural Gas, d/b/a National Grid NH: Carol J. Holahan, Esq. (McLane, Graf) <br> COURT REPORTER: SUSAN J. ROBIDAS, N.H. LCR NO. | I N D EX <br> WITNESS PANEL: Gilbert E. Gelineau, Jr. Thomas Palma <br> EXAMINATION <br> INTERROGATORIES: <br> EXHIBITS <br> PAGE |
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| ```APPEARANCES (CONT'D) Reptg. The Way Home: Alan Linder, Esq. (N.H. Legal Assistance) Reptg. N.H.Community Action Association: Dana Nute, Director Reptg. Conservation Law Foundation: Jonathan Peress, Esq. Reptg. the Office of Energy & Planning: Eric Steltzer, Energy Policy Analyst Reptg. Residential Ratepayers: Rorie E. P. Hollenberg, Esq. Stephen R. Eckberg Office of Consumer Advocate Reptg. NHPUC Staff: Marcia A.B. Thunberg, Esq. James J. Cunningham, Jr., Electric Div. Al-Azad Iqbal, Electric Division``` | (WHEREUPON, after brief recess and change of court reporters, the hearing resumed at 2:25 p.m.) <br> * * * * * * * * * * <br> MS. THUNBERG: Thank you for the break. Prior to our break, I had distributed a three-page document. I have since retracted that document and replaced it with a one-page document which should help us steer clear of any unintended supplementing of the PSNH IRP docket. But with that, I'd still like to have Staff ask the question first of this document and wait to make sure that Gerry doesn't have any objection to it. Thank you. <br> CHAIRMAN IGNATIUS: All right. <br> Well, let's mark this for identification as <br> 37. And that's the one page entitled "Exhibit IV-15." <br> (The document, as described, was herewith marked as 37 for identification.) <br> MR. EATON: And maybe counsel <br> could correct me, but it appears to be a page from the original filing of the Least Cost |



|  | Page 9 | [WITNESS PANEL: GELINEAU\|PALMA] Page 11 |
| :---: | :---: | :---: |
| 1 | creeping into the other docket any further. | 1 this potential. |
| 2 | And most of the parties to that docket are not | 2 A. (By Mr. Gelineau) I'm sorry, but I don't see |
| 3 | here, and we are not reopening the evidentiary | 335 percent anywhere, and I'm not sure what |
| 4 | reco | 4 it is you're referring to. |
| 5 | erg, can | 5 Q. Yeah. If you divide 226 by 640, you get |
| 6 | me an offer of proof on why the Exhibit 37 | 6 around 3 |
| 7 | numbers are significant to what we're trying | 7 A. (By Mr. Gelineau) Well, I don't think you're |
| 8 | to work through today? | 8 interpreting the table from the Least Cost |
| 9 | MS. THUNBERG: Iqbal Al-Azad | 9 Plan correctly, for starters. But if I |
| 10 | [sic] can answer it a lot more succinctly than | 10 could just say that it indicates here in |
| 11 | I can, so I'm deferring to him. | 11 that table, in the last column, it says that |
| 12 | CHAIRMAN IGNATIUS: All right. | 12 the 2015 Market Potential is 619, what we |
| 13 | MR. IQBAL: We are looking at | 13 said succinctly is that in 2015 we would |
| 14 | that number because that identified | 14 save, annually, 619. What we're saying in |
| 15 | weatherization potential annually, which is | 15 the 2012 plan is that we're going to save |
| 16 | submitted by PSNH. They said that they can | 16 993. So we're actually about a third higher |
| 17 | save 640 megawatt hour every year, but they | 17 than what it is -- than what it is that's |
| 18 | are saving 226 megawatt hour. So the point we | 18 shown here. |
| 19 | are trying to make, that on one side they are | 19 So I'm not sure what -- in other words, |
| 20 | saying that they cannot find these potential | 20 as I indicated, this is weatherization, all |
| 21 | customers, but GDS found that every year they | 21 weatherization, for both low-income and the |
| 22 | could save $400-640$ megawatt hour and leave | 22 Home Performance with ENERGY STAR Program. |
| 23 | it -- they are saving only 226. So they are | 23 And so its value, as I say, is 619. And if |
| 24 | leaving out almost 65-percent annual saving | 24 you look at the addition associated under |
|  | PITNESS PANEL: GELINEAU\|PALMA] Page 10 | [WITNESS PANEL: GELINEAU\|PALMA] Page 12 |
| 1 | potential every year. | 1 the annual megawatt hours of the 767.4 and |
| 2 | CHAIRMAN IGNATIUS: All right. | 2 the 226.0, you're going to get 993.4, which |
| 3 | Why don't you ask that question and focus on | 3 is substantially higher than what's in the |
| 4 | what PSNH believes is the potential for these | 4 Least Cost Plan. |
| 5 | programs, which is consistent with other | 5 Q. So you're saying that on Exhibit 37, this |
| 6 | testimony today, as opposed to what did it | 6226 megawatt hour doesn't include the |
| 7 | mean in the Least Cost Plan and how is it | 7 low-income program? |
| 8 | developed. All right? | 8 A. (By Mr. Gelineau) It does include it. But |
| 9 | MS. THUNBERG: So we can forego | 9 you see, again, without explaining what this |
| 10 | the offer of explaining the columns from -- | 10 table is, we're using these numbers -- we're |
| 11 | CHAIRMAN IGNATIUS: Well, why | 11 pulling these numbers out of this table and |
| 12 | don't we begin, first, with the question. I'm | 12 not explaining what it is that this table is |
| 13 | hoping it's not necessary to go into that | 13 supposed to characterize. And I think |
| 14 | detail, but... | 14 it's... I don't think you're using the table |
|  | BY MR. IQBAL | 15 correctly. That's my bottom line. |
| 16 | Q. So the direct question is that you | 16 CROSS-EXAMINATION (cont'd) |
| 17 | identified that you are saving only one -- | 17 BY MS. THUNBERG: |
| 18 | 35 percent of the annual potential in | 18 Q. Final question on this point is, if there |
| 19 | your -- in this docket and leaving out | 19 are potential energy savings out there, why |
| 20 | almost 65 percent of the potential every | 20 is PSNH and Unitil going after HPwES -- or |
| 21 | year; whereas, here you are saying that we | 21 why is the vast majority of savings in HPwES |
| 22 | have to shift this money to save fuels or | 22 coming from the non-electric savings? And |
| 23 | other sources; whereas, you identified that | 23 we talked about that either 98 percent or |
|  | you are not even achieving 35 percent of | $24 \quad 90$ percent. |

of all, the reason that the large majority of the savings are going to come from non-electric measures goes back to my point that I made earlier. You can't do this program cost-effectively unless you include weatherization. Weatherization is the big-ticket item. And so it's going to be -it can be expected that if you do weatherization for a non-electric home, it's going to have a significant amount of the savings that's not going to be electric. And if you don't do those measures, you are going to do two things: One is you're not going to be able to do the program cost-effectively; and the other thing is you're going to miss out on a lot of savings.

And I guess I would call your attention to a recommendation that comes out of the GDS report. And that GDS report says -- and I'm just -- basically, this is a recommendation which appears on Page 22 of the GDS study. It's talking about trying to
[WITNESS PANEL: GELINEAU|PALMA] Page 14

1 reach the expanding number and types of 2 products and services available through the existing residential energy-efficiency programs and promotion of these programs to include a larger number of potential participants may lead to increased overall energy savings is important --
Q. Can I just interrupt you and ask you which page are you reading from again?
A. (By Mr. Gelineau) It's Page 22.
Q. Thank you.
A. (By Mr. Gelineau) And it goes on to say, "It is important to recognize that such an expansion would require providing services to customers that heat with fuels other than electric or natural gas."

So what it's telling me, and I think it's kind of directing us, is that this GDS report says that if you want to get all of the electric savings, you're going to have look beyond just doing electric heat. And if you look at the GDS report, it's interesting. If you look at the potential energy savings, they not only have potential

| A. (By Mr. Gelineau) Couple of things. First | 1 |
| :--- | :--- |
| of all, the reason that the large majority | 2 |
| of the savings are going to come from | 3 |
| non-electric measures goes back to my point | 4 |
| that I made earlier. You can't do this | 5 |
| program cost-effectively unless you include | 6 |
| weatherization. Weatherization is the | 7 |
| big-ticket item. And so it's going to be -- | 8 |
| it can be expected that if you do | 9 |
| weatherization for a non-electric home, it's | 10 |
| going to have a significant amount of the | 11 |
| savings that's not going to be electric. | 12 |
| And if you don't do those measures, you are | 13 |
| going to do two things: One is you're not | 14 |
| going to be able to do the program | 15 |
| cost-effectively; and the other thing is | 16 |
| you're going to miss out on a lot of | 17 |
| savings. | 18 |
| And I guess I would call your attention | 19 |
| to a recommendation that comes out of the | 20 |
| GDS report. And that GDS report says -- and | 21 |
| I'm just -- basically, this is a | 22 |
| recommendation which appears on Page 22 of | 23 |
| the GDS study. It's talking about trying to | 24 |

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CHAIRMAN IGNATIUS: Please proceed.

MR. FRANZ: Thank you. CROSS-EXAMINATION
BY MR. FRANZ:
Q. Good afternoon, gentlemen.
A. (By Mr. Gelineau) Good afternoon.
A. (By Mr. Palma) Good afternoon.
Q. I just have a few questions that were questions addressed a little bit earlier concerning your data and the 1.3 and 1.4 percent respectively versus the census data, which really comes from the Department of Energy, Energy Information Administration Survey. Do you recall that discussion earlier?
A. (By Mr. Gelineau) Yes.
A. (By Mr. Palma) Yes.
Q. And in that, you raised a concern, Mr. Gelineau, that without seeing the survey, you weren't sure whether or not they just asked the simple question, "Well, what is your primary heating source for your residential house?" and whether they

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| :---: | :---: |
| 1 asked -- and whether they asked, "Do you | 1 of order, I intend to use a page from the GDS |
| 2 have a secondary source and which one do you | 2 report also. I don't know if it would mak |
| 3 use?" Do you remember that comme | 3 sense to -- I mean, we can do them |
| 4 A. (By Mr. Gelineau) I do. That was in the | 4 separately. It's actually one of the pages |
| 5 context of trying to understand | 5 that Mark was referring to earlier. I just |
| 6 question was, "Can you explain why there may | 6 didn't know if you wanted to have two |
| 7 be differences? | 7 different pages from the same report as two |
| 8 Q. Glad | 8 different exhibits. I'm |
| 9 Have either of you actually reviewe | 9 CHAIRMAN IGNATIUS: If Staff |
| 10 the census or EIA survey that we a | 10 comfortable with combining them and making |
| 11 referring to? | 11 them one exhibit, that's probably clearer. |
| 12 A. (By Mr. Palma) I have not reviewed | 12 (Discussion among counsel) |
| 13 A. (By Mr. Gelineau) I have not reviewed | 13 MS. THUNBERG: We have different |
| 14 either. I assume the i | 14 pages, so I'm going to pass out Page 8 of the |
| 15 provided is accura | 15 GDS study. |
| 16 Q. So it wouldn | 16 CHAIRMAN IGNATIUS: All right. |
| 17 that that energy survey is 96 pages long and | 17 And that will be Exhibit 38 for |
| 18 highly detailed and asked exactly those kind | 18 identification. |
| 19 of follow-up questions concerning energy | 19 (The document, as described, was |
| 20 use, primary use, secondary sources, type of | 20 herewith marked as 38 for |
| 21 insulation, age of house, and | 21 identification.) |
| 22 more information that you had concerns | 22 BY MS. THUNBERG: |
| 23 about. | 23 Q. I'd like to just, if you have the document, |
| 24 A. (By Mr. Gelineau) No, it wouldn't | 24 Page 8 of the GDS study, in front of you -- |
| [WITNESS PANEL: GELINEAU\|PALMA] Page 18 | [WITNESS PANEL: GELINEAU\|PALMA] Page 20 |
| 1 necessarily surprise me. But the size of | 1 A. (By Mr. Gelineau) Yes. |
| 2 the document doesn't necessarily tell me how | 2 Q. -- I'm looking at the very first column. |
| 3 accurate the information is. And I think | 3 The first block of descriptions has at the |
| 4 that the information that we have | 4 bottom "Potentially Obtainable." Do you see |
| 5 specifically relates to our customers and | 5 that -- |
| 6 their actual usage, and I just have to put a | 6 A. (By Mr. Palma) Yes. |
| 7 lot more weight on that than, you know, any | 7 Q. -- row? And it has a estimated annual |
| 8 size document that might come up that's not | 8 savings of 698 million. Do you see that? |
| 9 based on that same source information. | 9 A. (By Mr. Palma) Yes. |
| 10 Q. Even if it's highly detailed and asked | 10 A. (By Mr. Gelineau) Yes. |
| 11 questions that you raised concerns about. | 11 CHAIRMAN IGNATIUS: I'm sorry. |
| 12 A. (By Mr. Gelineau) Even then. | 12 I'm sorry. I thought I was getting different |
| 13 MR. FRANZ: Nothing further | 13 numbers. So which line are you in? |
| 14 Thank you. | 14 MS. THUNBERG: Fifth number |
| 15 MS. THUNBERG: I'd like to ask | 15 down -- row down, in the column entitled |
| 16 the clerk, have we marked the GDS study as an | 16 "Estimated Annual Savings by 2018, Kilowatt |
| 17 exhibit? | 17 Hours." And it's in the "Residential" sector. |
| 18 I'm getting a "No" from | 18 We're looking at Page 8 of the GDS study; |
| 19 PSNH. So I'd like to distribute a page from | 19 correct? |
| 20 the GDS report. This is a report that is on | 20 CHAIRMAN IGNATIUS: I've got |
| 21 the Commission's web site. Most people are | 21 Page 8. After that I'm not with you. |
| 22 familiar with it in here, but I have | 22 CMSR. HARRINGTON: You're in the |
| 23 questions about a particular table. | 23 first column? |
| 24 MS. GOLDWASSER: Just as a point | 24 MS. THUNBERG: Second column. |


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| :---: | :---: |
| 1 It's 698,069,156 estimated annual savings in | 1 budget that we are using. We have a budget |
| 2 kilowatt hours. | 2 of about $\$ 7$ million. They're using a budget |
| 3 CHAIRMAN IGNATIUS: Thank you. | 3 of about \$38 million. We have a savings of |
| 4 BY MS. THUNBERG: | 4 16.1. Their savings is 69.8. So there |
| 5 Q. Now, would you agree that there appear to be | 5 is -- you know, all of those factors need to |
| 6 significant remaining potentially obtainable | 6 be considered as you're considering the |
| 7 overall annual residential electric sector | 7 comparison of these numbers. |
| 8 savings? | 8 Q. Okay. I'm trying to establish -- I guess |
| 9 A. (By Mr. Gelineau) Yes. | 9 we're in agreement, then, is it fair to say, |
| 10 Q. Given that there are -- | 10 that there are potentially obtainable annual |
| 11 A. (By Mr. Gelineau) One point of clarity here | 11 savings that remain in -- |
| 12 before we get too far into this, though. | 12 A. (By Mr. Gelineau) Absolutely. |
| 13 What's not really clear from looking at this | 13 Q. Okay. |
| 14 table is that these numbers represent | 14 A. (By Mr. Palma) To the extent it's exactly |
| 15 10-year implementation. And so if you want | 15 this number that GDS has indicated is not - |
| 16 to consider the annual value, you need to | 16 you know, requires more study. This is a |
| 17 divide that number by 10. So that's not | 17 potential study. It's not an exact science. |
| 18698 -- or 698 annually. It's 69.8 annually. | 18 CMSR. HARRINGTON: Can I just |
| 19 Q. Thank you for that clarification. | 19 ask a clarifying question on this? Maybe I |
| 20 A. (By Mr. Gelineau) And I will say that it's | 20 can't read this. Is this number that we're |
| 21 not very -- I think that this report is | 21 talking about, the 69,156, those are commas |
| 22 particularly confusing in this aspect. But | 22 and not decimal points there? |
| 23 that's -- I did contact the principal who | 23 MS. THUNBERG: Those are commas, |
| 24 wrote the report prior to our meeting today | 24 yes. |
| [WITNESS PANEL: GELINEAU\|PALMA] Page 22 | [WITNESS PANEL: GELINEAU\|PALMA] Page 24 |
| 1 to get clarification on that. | 1 CMSR. HARRINGTON: So we're |
| 2 Q. Now, do you still have page -- Mr. Gelineau, | 2 dealing with, at this level, before we |
| 3 do you still have Page 24 of -- this was the | 3 adjusted by a factor of 10, it's 698 million, |
| 4 CORE document that was Attachment A with | 4 et cetera. |
| 5 Exhibit 23. | 5 MS. THUNBERG: Hmm-hmm. |
| 6 A. (By Mr. Gelineau) Yes. | 6 CMSR. HARRINGTON: And then if |
| 7 Q. And that shows annual megawatt savings -- | 7 we divide that by 10 , we're at 69 million, not |
| 8 A. (By Mr. Gelineau) Correct. | 869,000 as people were saying. So, I mean, |
| 9 Q. -- of 16,113.2? | 9 that's a pretty big difference when you start |
| 10 A. (By Mr. Gelineau) Yes, that's correct. | 10 to compare, 'cause you're talking about 16,000 |
| 11 Q. And that 16,000 number is less than if we | 11 on Page 24 comparing to 69,000. It's actually |
| 12 back into -- divide by 10 the 698 million | $12 \quad 69$ million -- |
| 13 that comes out to 69,000. So 16 is less | 13 A. (By Mr. Gelineau) I'm sorry, Commissioner. |
| 14 than that; correct? | 14 It's 16.1-megawatt hours, and these are |
| 15 A. (By Mr. Gelineau) That's correct. But the | 15 kilowatt hours. |
| 16 other thing that you want to look at as | 16 CMSR. HARRINGTON: Kilowatt |
| 17 you're reviewing that is Column No. 2, which | 17 hours. Okay. |
| 18 talks about utility costs of \$7 million. | 18 A. (By Mr. Gelineau) So they do work out to be |
| 19 And the last column in this report which | 19 the same factor. |
| 20 says that you've got -- even when you divide | 20 CMSR. HARRINGTON: That's what I |
| 21 by 10, you've got a budget of almost | 21 was trying to get straight, because people |
| $22 \quad \$ 40$ million. You've got \$38-something | 22 were using the terms back and forth, megawatt |
| 23 million. So the budget associated with | 23 [sic] hours, on Page 24. Okay. So that puts |
| 24 those larger savings is much larger than the | 24 about 16 million versus 69 million, just on |



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| :---: | :---: |
| 1 Q. Is PSNH and Unitil of the opinion that Staff | 1 that. |
| 2 opposes a permanent fuel-neutral HPwES | 2 A. (By Mr. Gelineau) Certainly we haven't come |
| 3 program? | 3 close to exhausting all of the potential |
| 4 A. (By Mr. Gelineau) Well, I would hope | 4 savings opportunities identified in the |
| 5 because otherwise I don't know why we're | 5 Climate Action Plan. If this question is |
| 6 here, quite frankly | 6 intended to get at the -- I think that in |
| 7 Q. Now, | 7 Staff testimony there was some discussion as |
| 8 A. (By Mr. Palma) Only thing I could add is | 8 to a portion of the Climate Action Plan |
| 9 nothing's ever permanent. But I think for | 9 addressed electric measures as opposed to |
| 10 the foreseeable two-year plan, they do | 10 other types of measures. And I think that |
| 11 oppose -- | 11 we tried to indicate in our testimony that, |
| 12 Q. Would you agree that Staff -- to the extent | 12 with the exception of maximized efficiency |
| 13 you think that Staff opposes it, would you | 13 in buildings, all of the other electric, |
| 14 agree that Staff only opposes HPwES because | 14 so-called "electric measures," are outside |
| 15 it's based on the system benefit charge and | 15 the scope of what it is that one would do in |
| 16 raises the issues of fairnes | 16 the energy-efficiency arena, particularly as |
| 17 A. (By Mr. Gelineau) Certainly I believe that | 17 it relates to the systems benefits charge. |
| 18 Staff's feeling is that that is an issue. | 18 I mean, some of these measures include |
| 19 I think that one of my -- one of my | 19 things like the RPS; they include REGGI; |
| 20 concerns is that this issue has come up time | 20 they include nuclear power; they include -- |
| 21 and again, even after the Commission had | 21 I'm trying to remember all of them. But the |
| 22 ruled that it was all right to use systems | 22 only 1 out of the 10 recommendations that |
| 23 benefits charges for fuel-neutral programs. | 23 relate directly to the systems benefits |
| 24 And I think that, more than anything, that's | 24 charge and energy efficiency is maximizing |
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| 1 why I'm glad that we're here today and we'll | 1 efficiency in buildings, which is also a |
| 2 finally have an opportunity to get this | 2 recommendation from another portion of the |
| 3 issue to bed, in back of us. | 3 plan, and that's the portion under which |
| 4 Q. Do you think that PSNH and Unitil exhausted | 4 this particular program is focused. It is |
| 5 all electric savings opportunities which | 5 aimed at trying to reduce energy in |
| 6 support the New Hampshire Climate Action | buildings. All energy. |
| 7 Plan goal of reducing greenhouse gas | 7 Q. I just have a few questions on performance |
| 8 emissions? | 8 incentive, to wrap up. |
| 9 A. (By Mr. Gelineau) Have we exhausted all | 9 MS. THUNBERG: And Chairman |
| 10 possibilities of -- have we done all the | 10 Ignatius, I just want clarification. I forget |
| 11 savings associated with the Climate Action | 11 how in depth we can go or should not go on |
| 12 Plan? | 12 performance incentive. We talked about it |
| 13 Q. Do you have an opinion as to the extent of | 13 this morning, whether it was ripe for |
| 14 exhaustion PSNH and Unitil have done with | 14 discussion today. I just had a few questions |
| 15 looking at electric savings opportunities | 15 bringing in the VEIC report. But I guess I |
| 16 and, I guess, exhausting those opportunities | 16 need a refreshing -- refreshment on the extent |
| 17 to support the New Hampshire Climate Action | 17 I should be going into it. |
| 18 Plan? You've mentioned your programs in the | 18 CHAIRMAN IGNATIUS: Well, my |
| 19 past -- or let me retract that. | 19 sense was the question of whether the HPwES |
| 20 Your testimony earlier today included | 20 program should be entitled to performance |
| 21 why you were using the HPwES -- or offering | 21 incentives on all measures, not just electric, |
| 22 the HPwES program was because it was partly | 22 is what's here as almost a policy question, I |
| 23 consistent with the New Hampshire Climate | 23 think, not the actual -- any change to |
| 24 Action Plan. So this question is going to | 24 incentives in the future for this program or |




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| :---: | :---: |
| 1 A. (By Mr. Gelineau) Certainly. | 1 that aside. |
| 2 Q. Okay. And just for clarification, it's all | 2 But if it is utility costs, utility |
| 3 of these costs that we talked about | 3 needed a budget to achieve that potential |
| 4 Page 24, the 7,053.1 number. It's these | 4 around 38 million; is that correct addition? |
| 5 costs that you are asking to be included in | 5 A. (By Mr. Gelineau) Could you repeat the |
| 6 the performance incentive calculation; | 6 question, please? |
| 7 that correct? | 7 Q. That you divide that 383 by 10, it gives |
| 8 A. (By Mr. Geline | $8 \quad 38$ million? |
| 9 similar to that, in all likelihood, but it | 9 A. (By Mr. Gelineau) Yes. |
| 10 not exactly the same. The way th | 10 Q. So, to achieve this 69 million megawatt hour |
| 11 performance calculation | 11 by year, you need a budget around |
| 12 now, it would use the actual expenditures as | 1238 million. That's what GDS is saying. Is |
| 13 opposed to the planned expenditures. So, to | 13 it correct? |
| 14 the extent that there is a difference, then | 14 A. (By Mr. Gelineau) Yes, it's just I don't |
| 15 there would be an adjustment there | 15 know -- yes. |
| 16 Q. Fair enough. Thank you | 16 Q. So what is the budget for residential |
| 17 MS. THUNBERG: Sorry. I'm j | 17 customers right now? |
| 18 doing a last call on questions from Staff. | 18 A. (By Mr. Gelineau) Well, 7 million. |
| 19 CHAIRMAN IGNATIUS: Please, take | 19 Q. So it's almost one fifth of that number? |
| 20 your time. | 20 A. (By Mr. Gelineau) Again, it'd be good to |
| 21 CROSS-EXAMINATION (cont'd) | 21 know whether or not the number in the GDS |
| 22 BY MR. IQBAL: | 22 study is -- includes customer money or no |
| 23 Q. Do you remember when we talked about the GDS 24 report on Page 8, we talked about the table, | 23 But, yes, if it's strictly the utility <br> 24 costs, the math would work out to a little |
|  | 24 costs, the math would work out to a rittle |
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| 1 Summary of Energy Saving Potential by 2018- | 1 over 20 percent -- a little under |
| 2 Electric? | $2 \quad 20$ percent. |
| 3 A. (By Mr. Gelineau) Yes. | 3 Q. So is it fair to say that, to achieve the |
| 4 Q. And do you remember you said that these | 4 potential electric savings every year, we |
| 5 savings actually have some cost, which is | 5 don't have enough funding right now? Is it |
| 6383 million for 10 years; so if you divide | 6 fair to say? |
| 7 that by 10, it would be 38 million? | 7 A. (By Mr. Gelineau) That is very fair to say. |
| 8 (Witness reviews document.) | 8 Q. So if we shift that level of funding from |
| 9 A. (By Mr. Gelineau) I think I would like to | 9 electric savings to save something else, |
| 10 review the definition of that column and | 10 does it make the situation worse? |
| 11 specifically -- it's not clear as to whether | 11 A. (By Mr. Gelineau) Again, I'm going to go |
| 12 or not that includes the customer cost as | 12 back and suggest that both the GDS study, |
| 13 well as the utility cost; whereas, | 13 which is the study we're looking at, and the |
| 14 other -- on Page 24 column, for example, | 14 Vermont study, are both suggesting that in |
| 15 it's talking just about utility costs. I'm | 15 order to maximize the savings, you need to |
| 16 not certain. I think this may be the | 16 look at all fuels. So if we fail to do |
| 17 overall cost, both customer and utility | 17 that, we're going to leave a lot of electric |
| 18 here. | 18 savings on the table. We're not going to |
| 19 A. (By Mr. Palma) Well, just to show where -- | 19 get them. |
| 20 it might require digging back a few pages in | 20 A. (By Mr. Palma) One thing I want to point out |
| 21 the study to see what the definition is of | 21 is that potential studies shows what |
| 22 that column. | 22 potential exists, but it doesn't factor in |
| 23 Q. Let's take a -- my understanding is it is | 23 the customer's ability and interest and |
| 24 utility costs. But we can -- let's keep | 24 desire to actually invest in energy |

 they wouldn't be. May, June, September and October, they're using 30 kilowatts a day. That would tell me that there's a substantial potential at least there for some electric efficiency measures simply because of the large amounts of electricity being consumed. That sound correct?
A. (By Mr. Gelineau) That's correct. That's exactly why they were on the list.
Q. So if we have the other customers that still -- even if they do have electric heat, they're even using more electricity then, because during the non-heating season they still meet the 30-kilowatts-a-day criteria, which would make me think, in the heating season, for the people that did have electric heat and used it, it would even be higher than that.
A. (By Mr. Gelineau) Correct.
Q. Okay. So we've established that now.

How many of these 63,700 customers have participated in the program to date that you're aware of? I mean, what would that
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number be now of those initial 63,700? If you just look back on page circle 9 there, it says only about 250 of these high-use customers have participated in general high-use, retrofit energy-efficiency programs. That, of course, was at the time. That's 10 years ago. Trying to find out, of these 63,700 customers, how many out there have not participated.
A. (By Mr. Gelineau) I think a round number to use would probably be about 1,000 customers a year.
Q. So that would be 10,000 customers probably have participated?
A. (By Mr. Gelineau) Something like that, yeah. And I think it's also fair to say that customers are going to drop off of that for other reasons other than participation in the program, particularly those that have electric heat.
Q. But you could also add some of those ones, the ones for non-electric heat. You might add some.
A. (By Mr. Gelineau) Possibly, yes.
Q. So the best guess is 10,000 , average. Gives us somewhere around 53,000 of those customers that have not participated. Okay. I just wanted to get that issue straight, 'cause we spent an awful lot of time discussing that.

Kind of moving along to a different subject, just to kind of get some of the basics down so I make sure we're talking about the same thing, where does the money come from for the -- I can't even pronounce this thing -- H-P-W-E-S?
A. (By Mr. Gelineau) Systems benefits charge.
Q. So the pilot program comes from systems benefits charge. And you're proposing if this new permanent -- more permanent program comes in, it would come from the systems benefits charge as well?
A. Correct.
Q. And what has happened to the systems benefits charge revenues over the last couple years? Just generally. Has the trend been a large increase, about the same, decrease?
A. (By Mr. Gelineau) It's about the same. But, you know, overall, things are starting -there is another component that goes into this. It's not just the systems benefits charge revenue. It also includes the Forward Capacity Market revenue, which has been going up.
Q. Well, for the short term maybe.
A. (By Mr. Gelineau) But it's probably adding 10 percent now, something like that.
Q. So the Forward Capacity Market, flat on the systems benefits charge, but increases on the Forward Capacity Market.
A. (By Mr. Gelineau) We're about $\$ 21$ million overall right now.
Q. Now, if this program, this -- how is it pronounced again?
A. Home Performance with ENERGY STAR.
Q. Okay. I'll just stick with the H-P-W-E-S then. Those funds come out of the systems benefits charge. Right now there's no plans to increase the systems benefits charge. So this money would have to come at the expense of some other electrical efficiency


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| :---: | :---: |
| 1 all of those | 1 their own money yet to put in |
| 2 A. (By Mr. Gelineau) We have that situation | 2 energy-efficiency measures, as compared to |
| 3 today. And quite frankly, we are looking at | 3 the person who went out and spent money and |
| 4 trying to start a marketing campaign. We | 4 bought new windows and maybe a more |
| 5 don't -- customers are not banging down the | 5 efficient furnace or put in insulation, so |
| 6 door to get this stuff. And I think that | 6 that their consumption of fuel was lower, as |
| 7 we -- I think that the Commissioners may be | 7 compared to the neighbor across street wh |
| 8 aware that there's a companion program that | 8 didn't. The first house who spent their own |
| 9 we just started with the Better Buildings | money, your little formula would say too |
| 10 Program, which is giving -- which is putting | 10 bad, you don't qualify; whereas, the person |
| 11 additional money into this particular | 11 who chose not to spend their own money would |
| 12 program. And that is going to allow us to | 12 qualify; is that correct? |
| 13 do some extra homes. And our concern right | 13 A. (By Mr. Gelineau) Presumably if they got a |
| 14 now is not that we have too many customers, | 14 good deal on the first house, that's |
| 15 but can we get everybody that we have monies | 15 absolutely true. |
| 16 available for. So we are definitely going | 16 Q. So we got through that part. Let me see. |
| 17 to be doing some marketing to reach out to | 17 Well, let's go over this, because this |
| 18 those customers and bring them in. | 18 was something you sort of brought up when |
| 19 There is another thing here going on, | 19 you talked about DR in the Forward Capacity |
| 20 and that is that this is a program of | 20 Market. So you kind of look at -- I'm just |
| 21 self-selection. In order to participate in | 21 trying to get an idea on where we go with |
| 22 the program, customers need to have this | 22 the limits of this program. Now, I've heard |
| 23 gas-gauge home heating index that says that | 23 you say it would apply to all customers. |
| 24 they have sufficient opportunity within | 24 And this, again, either one of you answer as |
| [WITNESS PANEL: GELINEAU\|PALMA] Page 58 | [WITNESS PANEL: GELINEAU\|PALMA] Page 60 |
| their home to be able to justify our | 1 appropriate, please. |
| 2 visiting and doing an audit. And so that is | 2 So let's say there was a residence that |
| 3 a process that they need to go through. | 3 had received, from one of the various |
| 4 They can either do it online themselves or | 4 programs, grants to put in either a solar or |
| 5 call us, and we'll help them through the | 5 wind project, and they had been doing net |
| 6 process. But we need to have some data fro | 6 metering, and they had little net electric |
| 7 them that will allow us to determine that | 7 consumption. So they were effectively |
| 8 they are in fact qualified or that the | 8 paying very, very little systems benefits |
| 9 potential exists at their particular | 9 charge because their electric bill was |
| 10 residence to make it worthwhile to go out | 10 extremely small because of this net metered |
| 11 there and work with them. | 11 solar or wind project. Would they be |
| 12 Q. And that potential in the | 12 eligible under your proposal? |
| 13 basically how much do you -- how much fuel | 13 A. (By Mr. Gelineau) Yes. |
| 14 do you consume, converted to Btus, divided | 14 Q. And let's go to the further extreme. Let's |
| 15 by the square footage of your house. | 15 say their net meter was so effective, they |
| 16 A. (By Mr. Gelineau) That's correct. That's | 16 consumed absolutely no electricity. Would |
| 17 the starting point. And we also do require | 17 they still be eligible? |
| 18 that we have billing data, so that we know | 18 A. Under the current proposal, yes. |
| 19 that they actually -- some verification, so | 19 Q. Okay. One more step. Their house doesn't |
| 20 when they say they use 2,000 gallons of oil, | 20 have electric service to them at all, but |
| 21 we'd like to, you know, validate that that | 21 they burn fuel. They -- for whatever |
| 22 in fact is true. | 22 reason, they decide to live in the woods and |
| 23 Q. Okay. So, I mean, to some extent then, this | 23 they burn -- have a wood-burning stove and |
| 24 is targeting the people that haven't spent | 24 propane lights. They would qualify -- let's |



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| :---: | :---: |
| 1 yet. | 1 were consuming energy on, the program would |
| 2 Q. Right. But let's just say someone, for some | 2 be looking at it as a over program to reduce |
| 3 unknown reason, put the central air | 3 energy, however it was used. And a lot of |
| 4 conditioning heat dump on the south side of | 4 this -- and you -- it's also been mentioned |
| 5 their house and it sat in the sun all day | 5 a couple of times about funding levels. |
| 6 and they could show that by putting in a | So, as the program like this would |
| 7 number of bushes and shrubs and whatever | 7 expand, and you see all these going from an |
| 8 would reduce it by a certain amount. They | 8 opportunity of 5500 residents to 500,000 |
| 9 would at least be eligible for | residents, whatever, or maybe more than that |
| 10 consideration; is that correct? I'm not | 10 when you put in all the utilities, as a |
| 11 saying -- I'm not asking you to do the math. | 11 potential, not necessarily as necessarily |
| 12 But they wouldn't be explicitly excluded | 12 ones that are going to sign up, but as a |
| 13 under this program | 13 potential thing, it seems to me as if the |
| 14 A. (By Mr. Gelineau) We are willing to consider | 14 next logical step is to increase -- is for |
| 15 innovative ideas on what might provide an | 15 attempts to increase the fund. See how much |
| 16 energy-saving opportunity that's | 16 wonderful stuff we can do now. If we only |
| 17 cost-effective. | 17 had twice as much money, we could do twice |
| 18 Q. And you've mentioned climate change a number | 18 as much wonderful stuff. |
| 19 of times and climate change plans. So | 19 Does your company, either one of you, |
| 20 again, I'm trying to get an idea of where | 20 have any plans to try to request increase |
| 21 you try to draw the line here. | 21 for the system benefit charge to fund this |
| 22 What about -- you think this money | 22 program? |
| 23 should go to tuning up cars? After all, | 23 A. (By Mr. Palma) I mean, we're already in the |
| 24 that cuts down -- improves the efficiency of | 24 program basically at the level of, you know, |
| [WITNESS PANEL: GELINEAU\|PALMA] Page 66 | [WITNESS PANEL: GELINEAU\|PALMA] Page 68 |
| 1 cars. I mean, they burn less gas, less | 1 it's fuel-neutral. We have established |
| 2 pollution. Is that something that's open to | 2 rebate protocol. And this year's a little |
| 3 this, or is it only attached to the house | 3 bit more of a struggle than last year to |
| 4 and the land? How would you make a | 4 actually meet the goals that we set out. |
| 5 differentiation there? | 5 Our company has no intention of asking for |
| 6 A. (By Mr. Gelineau) That's not currently in | 6 more money for this program going forward. |
| 7 the plan right now. | 7 Q. Public Service? |
| 8 Q. Does the plan explicitly forbid something | 8 A. (By Mr. Gelineau) We have no plans to |
| 9 like that? | 9 request additional funding at this time. |
| 10 A. (By Mr. Gelineau) All I can think of is | 10 I think that you're probably aware that |
| 11 somebody living in their car. No, that's | 11 this is one of the recommendations that |
| 12 not the plan right now, Commissioner. | 12 appears repeatedly in the Vermont study, |
| 13 Q. My daughter at times lives in her van. | 13 that funding needs to be increased. We have |
| 14 she moved to New Hampshire, would she be | 14 been actively participating in discussions |
| 15 eligible? | 15 around that and will continue to do that. |
| 16 A. (By Mr. Palma) Does she have a meter? If | 16 But we have no plans right now to ask for |
| 17 she has a meter, she might be. | 17 additional funding. |
| 18 Q. She has a gas gauge. I think it's working | 18 Q. I think you'll see that recommendation in |
| 19 now. | 19 any study that -- |
| 20 A. (By Mr. Palma) That doesn't count. | 20 A. (By Mr. Gelineau) Potentially. You're |
| 21 Q. You had mentioned this before, 'cause it | 21 correct. |
| 22 does seem like you're targeting this package | 22 Q. This is the part that I'm having a little |
| 23 deal, all encompassing, the fact that it | 23 bit of trouble figuring out. |
| 24 would be whatever you -- whatever things you | 24 You talked about the electric heat |



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| :---: | :---: |
| 1 demand and we don't need to use a 50-percent | 1 amount of people. And the only way to know |
| 2 rebate, we'll cut that back | 2 this is to actually do our marketing like we |
| 3 Q. So you're going to -- you're just going | 3 planned on doing, probably later this year. |
| 4 forward on this. If it goes through, you'd | 4 We don't know for sure. There's a lot of |
| 5 be starting out looking at about the sa | 5 theories. Until you actually do the |
| 6 percentage, that same 4 percent. But that's | 6 marketing and see who comes in, we would |
| 7 going to be 4 percent of a much bigger | 7 never know of those electric heat customers |
| 8 number. So you'd have more potential | 8 who's coming in. But we do know if the |
| 9 customers or probably more people that will | 94 percent was the magic number, we'd have |
| 10 sign up for the program at least? | 10 about 2400 customers. And maybe over the |
| 11 A. (By Mr. Gelineau) I'm not clear about the | 11 last 10 years we've done 4- or 500. So |
| 124 percent. I'm sorry. | 12 there's about a couple thousand left. And |
| 13 Q. I thought you said - | 13 there's new homes being built, and that |
| 14 A. (By Mr. Gelineau) But we have capacity for, | 14 turns into old homes and whatnot. |
| 15 I think this year is something like 562 | 15 Q. So, just -- this is the part I'm trying to |
| 16 single-family homes with Public Service, | 16 get a little bit straight here. This was a |
| 17 okay. So we're looking to get 100 percent | 17 stated a number of times: "Without |
| 18 of those 562. | 18 weatherization, it's not cost-effective." |
| 19 Q. And is that under the pilot program or the | 19 But with it, it seems like at least a lot of |
| 20 pre-pilot? | 20 customers, even if you offer that, don't |
| 21 A. (By Mr. Gelineau) This is under the program | 21 want to participate, anyways, as evidenced |
| 22 for 2012, which has been labeled "the pilot | 22 by the small amount of electric heat people |
| 23 program." And going forward, we're talking | 23 that participated. |
| 24 about doing exactly the same thing. The | 24 So, my -- I think -- let me see if get |
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| 1 only thing that's changing is the "pilot" | 1 kind of the conclusion here correct, that |
| 2 disappears. But I mean the program and | 2 even though you don't anticipate a |
| 3 everything about it is consistent. | 3 percentage of the other fuel people being |
| 4 A. (By Mr. Palma) For Unitil, we have | 4 much higher than the electric heat people |
| 5 approximately 60,000 residential customers. | 5 do, the number of them is big enough so that |
| 6 And if 4 percent is the magic number, we'd | 6 you'll increase your potential population; |
| 7 be looking at 2400 all fuel customers. | is that correct? |
| 8 Q. Twenty-four hundred. | 8 A. (By Mr. Gelineau) I'm afraid that there's a |
| 9 A. (By Mr. Palma) Twenty-four hundred. And | 9 confusion with this 4 percent. Four percent |
| 10 we'd do something like 60 units a year. So | 10 doesn't mean anything, from my perspective, |
| 11 that's several -- you know, that's 40 years | 11 other than the fact that that happened to be |
| 12 of customers, which would make a sustainable | 12 the response rate from a particular |
| 13 program versus -- you know, in my -- in our | 13 offering. Again, we're trying to have 562 |
| 14 calculations, I think we came out with we | 14 customers sign up for the program. We |
| 15 think there's 800 electric heat customers. | 15 expect that five of them will be electric |
| 16 When I look at the numbers, I personally | 16 heat. I think there's some 200-some that |
| 17 think there's less than 100 that actually -- | 17 are oil heat. There's another -- there's |
| 18 Q. That actually uses -- | 18 one that's kerosene. These are all |
| 19 A. (By Mr. Palma) -- would actually qualify for | 19 projections. But I mean this is what we |
| 20 the program. And there's probably half or | 20 projected in our plan. And the actual |
| 21 less than that that would actually even pick | 21 results may vary, but -- |
| 22 up the phone and call us to want to do | 22 Q. And is part of the reason for the expansion |
| 23 something. So you're down to maybe a third, | 23 to other fuels, then, the fact that you |
| 24 maybe, a year. It's not a sustainable | 24 simply were going to run out of |







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| :---: | :---: |
| 1 that was to be able to capture and identify | 1 number that was reflective of their |
| 2 those customers while we were into the data | 2 estimate, as far as what the savings would |
| 3 base looking at that, you know, what's the | 3 be for pumps and fans associated with the |
| 4 name and address of those folks, so we could | 4 furnace or bo |
| 5 look to market to them as well | 5 Q. Thank you for that. |
| 6 Q. And I mentioned when I started this topic | 6 And I think lastly, for me, again, on |
| 7 about the impact on peak demand. Do you | 7 the 1.4 or 1.3 percent going back to the |
| 8 know if anybody's looking at the value of | 8 electric heat customers, Staff has obviously |
| 9 that reduction on peak demand? | 9 talked about the energy -- the EIA data. I |
| 10 A. (By Mr. Gelineau) We do publish that as | 10 was just curious if either one of you have |
| 11 well. And I think that Exhibit 23, I guess, | 11 experience in the past using EIA data. |
| 12 shows what the program's value is on peak | 12 A. (By Mr. Palma) No, I do not. |
| 13 demand. There's a column there that shows | 13 A. (By Mr. Gelineau) I have used it. But, |
| 14 you what the anticipated reduction on summer | 14 again, I -- well, yes, I have used it. |
| 15 and winter savings in kW are. | 15 Q. Maybe the question I'll ask might get the |
| 16 CHAIRMAN IGNATIUS: And | 16 answer you're about to say. |
| 17 that's -- Exhibit 23 was in the prior phase of | 17 When you have used it, do you find that |
| 18 this proceeding. We saw two pages brought in | 18 to be more or less granular, if you will, |
| 19 today; is that right? | 19 than doing your own, talking to your own |
| 20 A. (By Mr. Gelineau) Yes. I'm sorry. I didn't | 20 customers and surveying your own customer |
| 21 keep track of it, what the exhibits are. | 21 A. (By Mr. Gelineau) Certainly I feel as though |
| 22 But I think it's 23, and it was a two-page | 22 using the data we have on our own customers |
| 23 exhibit. And this is on Page 24 and 25. | 23 is far more accurate. |
| 24 A. (By Mr. Palma) December filing | 24 CMSR. SCOTT: Thank you very |
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| 1 Q. That was handed out today also. | 1 much. |
| 2 A. (By Mr. Gelineau) Yes | 2 CHAIRMAN IGNATIUS: I have a few |
| 3 Q. And I think -- I can't remember if it's in | 3 other questions, but many of them have been |
| 4 the reading or the docket or one of your | 4 addressed. |
| 5 statements. Is it Cadmus? Is that the name | 5 INTERROGATORIES BY CHAIRMAN IGNATIUS: |
| 6 of the company? | 6 Q. Is it correct that the HPwES program came in |
| 7 A. (By Mr. Gelineau) Cadmus, yes. | 7 partway into 2009? |
| 8 Q. You've asked them to re-look at the impact | 8 A. (By Mr. Gelineau) On June 4th of 2009 it was |
| 9 evaluation; is that correct? | 9 approved. |
| 10 A. (By Mr. Gelineau) That's correct. They | 10 Q. And so it's been in operation these last |
| 11 found some 22.3 million Btus, on average, | 11 couple of years under the term of a "pilot." |
| 12 for the energy savings in a home. And they | 12 Is there anything that's being proposed by |
| 13 expressed all of the energy savings in | 13 the companies to change in the program? |
| 14 so-called MMBtu or thermal unit. We've | 14 A. (By Mr. Gelineau) Nothing at this time. As |
| 15 asked them to take a look at that and see | 15 it's been pointed out, the major change to |
| 16 exactly what -- whether they've got the data | 16 date has been the cut-back in the rebate |
| 17 to break that out in any more detail as it | 17 from the first two years -- or year and a |
| 18 would relate to electric-specific savings. | 18 half, when it was operating at 50 percent -- |
| 19 Q. And do you know when that might be | 19 75-percent rebate, and it's been cut back to |
| 20 available? Will that be publicly available? | $20 \quad 50$ percent. |
| 21 A. (By Mr. Gelineau) We'll certainly make it | 21 Q. So the request now is to lift the term |
| 22 publicly available if we can get it. We | 22 "pilot" from it, but otherwise to keep the |
| 23 are -- we have gotten -- the only thing we | 23 program as it's currently operating? |
| 24 have from them at this point is this 42 | 24 A. (By Mr. Gelineau) That's the request right |








DAY 1 - MIDAFTERNOON SESSION ONLY - June 6, 2012
DE 10-188 2011 CORE ELECTRIC PROGRAMS


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| $\begin{gathered} \text { 93-percent (1) } \\ \text { 104:16 } \end{gathered}$ | $45: 4,17 ; 53: 5 ; 58: 19$ 61:18;68:4;69:9,17; | $108: 22$ | 83:24 | $28: 4 ; 30: 11 ; 78: 6,13$ |
| :---: | :---: | :---: | :---: | :---: |
| 96 (2) | 71:2;74:17,18,19,21; | 6:9;23:9;38:4;108:22; | 97:14;113:21 | 113:6 |
| 17:17;71:7 | 75:2,5;80:5;87:21; | 111:10 | anyways (1) | assume (3) |
| 98 (2) | 91:10,15,16;102:14,20; | ahead (3) | 75:21 | 17:14;61:1;69:10 |
| 12:23;119:10 | 104:19;105:19;106:5, | 62:16;87:2;90:15 | apologize (1) | assuming (4) |
| 993 (1) | 24;107:4,10,12;116:20 | aimed (2) | 71:15 | 26:11,13;63:9;71:1 |
| 11:16 | ad (3) | 32:5;54:23 | apparently (1) | assurance (1) |
| 993.4 (1) | 69:7,115:6,7 | air (13) | 69:5 | 106:11 |
| 12:2 | add (4) | 64:2,18;65:3;95:9; | appear (2) | attached (3) |
| A | $\begin{aligned} & \text { 29:8;50:21,23;81:24 } \\ & \text { adding (1) } \end{aligned}$ | $\begin{aligned} & 96: 6,9,10,12,21,21 \\ & 117: 5 ; 120: 20,22 \end{aligned}$ | $21: 5 ; 119: 2$ <br> appears (3) | $\begin{array}{r} \text { 6:9;38:3;66:3 } \\ \text { Attachment (1) } \end{array}$ |
|  | 52: | air-source | 4:23;13:23;68:12 | 22:4 |
| A2 (1) | addition (2) | 103:6 | appliance (2) | attempts (1) |
| 47:19 | 11:24;43:4 | Al-Azad (1) | 62:23;102:17 | 67:15 |
| abilities (1) | additional (11) | 9:9 | appliances (3) | attention (2) |
| 46:2 | 8:15;54:9;57:11;68:9, | alleging (1) | 77:12;90:24;92:2 | 13:19;38:7 |
| ability (2) | 17;71:9;72:23;85:14,18; | 54:2 | application (1) | Attorney (1) |
| 44:23;45:17 | 103:2;116:8 | allow (8) | 64:20 | 5:17 |
| able (13) | address (2) | 35:8;56:4;57:12;58:7; | applied (1) | Auction (1) |
| 13:15;56:6,17,24; | 93:9;97:4 | 61:19;80:14;82:23; | 64:21 | 80:10 |
| 58:1;62:19;83:6,21; | addressed (4) | 110:17 | apply (2) | audit (8) |
| 87:16;88:15;97:1; | 15:18;16:10;31:9; | allowed (2) | 46:15;59:23 | 58:2;104:17;106:1,23, |
| 105:11;116:15 | 100:4 | 36:21;105:10 | Appreciate (1) | 24;107:3,6,7 |
| absent (1) | addresses (1) | allows (2) | 86:10 | auditor (4) |
| 54:9 | 86:1 | 80:7;93:1 | approach (1) | 92:10;93:19,21;107:2 |
| Absolutely (5) | adjourned (2) | almost (6) | 108:19 | auditors (2) |
| 23:12;56:14;59:15; | 123:13,16 | 9:24;10:20;22:21; | appropriate (4) | 91:13;107:8 |
| 60:16;77:2 | Adjusted (4) | 32:22;43:19;104:19 | 60:1;82:13;107:22; | audits (4) |
| AC (1) | 5:23;8:3,12;24:3 | alone (1) | 108:5 | 104:9,12;106:22; |
| 95:1 | adjustment (2) | 90:18 | approval (1) | 121:15 |
| account (2) | 41:15;47:1 | along (3) | 34:14 | available (12) |
| 61:6,7 | Administration (1) | 51:7;69:14;110:20 | approved (3) | 8:18;14:2;57:16; |
| accurate (3) | 16:14 | always (1) | 100:9;109:17;110:2 | $71: 21 ; 92: 16 ; 98: 20,20,$ |
| 17:15;18:3;99:23 | advantage (3) | 93:20 | approximately (1) | $22 ; 122: 14,17,19,21$ |
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