

1 **STATE OF NEW HAMPSHIRE**
2 **PUBLIC UTILITIES COMMISSION**

3
4 **September 25, 2019** - 1:40 p.m.
5 Concord, New Hampshire

6
7 RE: **DE 19-139**
8 **EVERSOURCE ENERGY:**
9 **2019 Least Cost Integrated**
10 **Resource Plan.**
11 **(Prehearing conference)**

NHPUC 14OCT19PM1:40

12 **PRESENT:** Cmsr. Michael S. Giaimo, Presiding
13 Cmsr. Kathryn M. Bailey

14 Sandy Deno, Clerk

15 **APPEARANCES:** **Reptg. Public Service Company of**
16 **New Hampshire d/b/a Eversource Energy:**
17 Matthew J. Fossum, Esq

18 **Reptg. Residential Ratepayers:**
19 D. Maurice Kreis, Esq., Consumer Adv.
20 Office of Consumer Advocate

21 **Reptg. PUC Staff:**
22 Brian D. Buckley, Esq.
23 Kurt Demmer, Electric Division
24 Elizabeth Nixon, Electric Division

25 Court Reporter: Steven E. Patnaude, LCR No. 52

CERTIFIED
ORIGINAL TRANSCRIPT

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I N D E X

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**DISCUSSION ON THE MOTION FOR CONFIDENTIAL
TREATMENT AND PROTECTIVE ORDER** 5

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P R O C E E D I N G

1
2 CMSR. GIAIMO: Good afternoon. We
3 are here today in Docket DE 19-139, Eversource
4 Energy's 2019 Least Cost Integrated Resource
5 Plan. I note for the record that we received
6 an affidavit of publication earlier this month
7 from the Company. We also, on August 27,
8 received notice that the Consumer Advocate
9 would be participating in the docket.

10 With respect to interventions, to the
11 best of my knowledge, we have none. And seeing
12 only the familiar faces, I'm assuming that that
13 is, in fact, the case.

14 We do have one motion, a Motion for
15 Confidential Treatment and Protective Order,
16 from Attorney Fossum. Mr. Fossum, after we
17 take appearances, I'll give you, as well as the
18 Staff and OCA, the ability to comment on the
19 motion. But, in general, if I understand the
20 motion correctly, the Company asserts that
21 there's certain information, including one-line
22 diagrams that go to the substation level, as
23 well as transformer ratings and line loading
24 information, which the Company deems is

1 confidential, because, at their essence, this
2 is confidential energy infrastructure
3 information, and the release of that type of
4 information could violate federal and state
5 commission rules and create a threat to the
6 system, to system security as well.

7 The other part of the motion is that
8 the Company asks to seek that certain
9 employees' names redacted for employee privacy
10 reasons.

11 Before turning to the parties to get
12 their opinion on that motion, let's take
13 appearances. Mr. Fossum.

14 MR. FOSSUM: And good afternoon,
15 Commissioners. Matthew Fossum, here for Public
16 Service Company of New Hampshire, doing
17 business as Eversource Energy.

18 CMSR. GIAIMO: Thank you.

19 MR. KREIS: Good afternoon,
20 Commissioner Bailey, Commissioner Giaimo. It's
21 great to see Commissioner Giaimo wielding the
22 gavel.

23 Oh. I'm Don Kreis, D. Maurice Kreis.
24 I am the Consumer Advocate. And I'm here on

1 behalf of residential customers of this
2 excellent utility.

3 CMSR. GIAIMO: Thank you, Mr. Kreis.

4 MR. BUCKLEY: Good afternoon,
5 Commissioners Bailey and Giaimo. My name is
6 Brian D. Buckley. And I am the Staff attorney
7 in this matter. And to my left is
8 Ms. Elizabeth Nixon and Mr. Kurt Demmer, the
9 Staff analysts on this matter as well.

10 CMSR. GIAIMO: Thank you, Mr.
11 Buckley.

12 So, turning our attention back to the
13 confidentiality motion. Mr. Fossum, I'm hoping
14 you can maybe start the discussion, and make
15 sure that my understanding is, in fact, right.
16 And the one question I did have is, why did the
17 Company include names in the filing, if the
18 names are essentially immaterial, as your
19 confidentiality motion suggests?

20 MR. FOSSUM: Certainly. I think, in
21 general, your summation of our motion is
22 accurate. So, I'll take each of the two issues
23 that we raised in the same order that you did,
24 and I'll answer your question along the way.

1 Yes. The first group of information
2 is, by our analysis, CEII, Confidential Energy
3 Infrastructure Information. We took care to go
4 through all of our documents. You've seen they
5 have been sort of as minimally redacted as we
6 felt was reasonable. We have not asked for
7 blanket protection on any document. And we
8 have kept it to information specific to the
9 bulk system. The lower voltage system we have
10 not redacted any information.

11 We believe that we have appropriately
12 identified the information, and that it is
13 appropriate, for the reasons stated in the
14 motion, to protect that information.

15 Relative to the names of personnel,
16 that was sort of an unavoidable issue. Many of
17 the documents that we needed to introduce were
18 produced by people. And, so, the Project
19 Authorization forms, where an employee seeks
20 authorization to proceed with a capital
21 investment, identifies which employee that is.
22 And, so, to provide those documents, we wanted
23 to protect the information of those lower level
24 employees, and say this is consistent with what

1 we have done in the past. And, though you may
2 not have seen it, it is consistent with what --
3 I believe it's consistent with what we're doing
4 over in the rate case with similar information.

5 CMSR. GIAIMO: Thank you. Others?
6 Do others have opinion? Mr. Kreis.

7 MR. KREIS: Thank you. You mentioned
8 earlier that we would have the "ability" to
9 express an opinion. Of course, we always have
10 the ability to express --

11 CMSR. GIAIMO: The willingness then?

12 MR. KREIS: It's really about the
13 opportunity to express an opinion. And I do
14 have the following opinions:

15 I don't think that employees of
16 Eversource have any privacy interest in the
17 fact that they are employees of Eversource.
18 Now, you know, I'm a state employee. So, the
19 fact of my employment is a matter of public
20 record. And I just -- I don't have any
21 recollection of anybody ever claiming in the
22 past that the mere fact that one is employed by
23 an investor-owned utility is private
24 information.

1 But, if that is something that the
2 Commission feels is a cognizable privacy
3 interest, I promise you I will not be appealing
4 that determination to the New Hampshire Supreme
5 Court. So, I can assign that question to your
6 good judgments.

7 And, then, on the question of other
8 redacted information, I don't think I object to
9 the proposed confidential treatment of that
10 information. But I do have a question/concern.
11 And it has to do with the fact that the edition
12 of certain documents that I've received is
13 redacted. And I'm looking, for example, on
14 Bates Page 109, and also on Bates Page --
15 there's another Bates Page that I dog-eared,
16 and that I can't -- oh, here we go. Bates
17 Pages 063 and -- 063. So, these are places
18 where maps have been redacted from the edition
19 of these documents that the OCA received. And
20 I don't know whether the same is true of the
21 edition of these documents that the PUC or the
22 Staff has received. But -- and they're line
23 drawings. And, frankly, we don't have need of
24 those drawings, because I don't have the

1 expertise to review system diagrams anyway with
2 that level of engineering sophistication.

3 But I do assert, on behalf of the
4 OCA, the right to receive and review unredacted
5 versions of what the Company files with the
6 Commission. And, if the information is subject
7 to confidential treatment, that's another
8 consideration altogether. And, of course, we
9 adhere, because we're obliged to adhere, to the
10 Commission's determinations about what
11 information is ultimately subject to
12 confidential treatment.

13 CMSR. GIAIMO: Okay. Mr. Buckley.
14 Commissioner Bailey.

15 CMSR. BAILEY: I don't know what your
16 copy looks like, but my copy is also missing
17 that information. And I don't know if -- it
18 might just be a production problem. It looks
19 like there should be some information on
20 Pages -- one-line diagrams on Pages 160, 161.

21 MR. FOSSUM: I will admit, yes. For
22 every copy that was provided, both to the
23 Commission and the OCA, there was, my memory, I
24 don't know, about ten or so pages where that

1 information was removed. And there is the
2 notation that you see there that it was
3 redacted, that it was removed.

4 CMSR. BAILEY: So, it wasn't supposed
5 to be filed?

6 MR. FOSSUM: Correct. It was not
7 intended to be filed with anyone, my
8 understanding. And the reason for that is that
9 those who are entitled to see Confidential
10 Energy Infrastructure Information have to have
11 a certain clearance. And that we're certain of
12 that information, without those clearances, we
13 are not supposed to be providing it to anyone.
14 That's my understanding.

15 I'm happy to be corrected in that
16 understanding. But that is my present
17 understanding, and that was the decision that
18 we made relative to those documents.

19 If, ultimately, somebody has better
20 information about that, we can resubmit those
21 pages and provide them appropriately. But that
22 was the decision that we made, given the
23 information we had.

24 CMSR. BAILEY: So, then, can you

1 point me, in the confidential document, to
2 where Critical Energy Information --
3 Infrastructure Information is located? Or, has
4 it all been removed? And, if so, what's
5 confidential?

6 MR. FOSSUM: Well, the material that
7 has been -- some of it has been redacted and
8 some of it has been removed. And the redacted
9 information, the copies that you have, should
10 have been -- I believe they have the graying of
11 the material that is redacted.

12 That is, there are, as I understand
13 again, certain levels of Confidential Energy
14 Infrastructure Information. There's one level
15 where the text information has been provided in
16 a confidential format. There is another level,
17 involving the maps and one-line diagrams, that
18 information has been removed, based upon our
19 understanding at present.

20 As I said, I'm open to be corrected
21 about that understanding. If I am corrected,
22 we will resubmit appropriately. But that was
23 the decision that we made, based upon our
24 understanding of how that information was to be

1 handled.

2 CMSR. BAILEY: Okay. Thanks.

3 MR. KREIS: Well, I would just point
4 out that there's only two flavors:

5 Confidential and public. At least that's what
6 RSA 91-A says, and the Commission's rules.

7 MR. FOSSUM: And I guess my quick
8 rejoinder would be, this is not a request under
9 necessarily 91-A and the Commission rules.
10 This is a request under federal law.

11 CMSR. GIAIMO: And we still haven't
12 heard from one. So, we'll give Mr. Buckley an
13 opportunity, if he has anything to opine.

14 MR. BUCKLEY: Thank you, Commissioner
15 Giaimo.

16 The Staff takes the position that the
17 Commission should not rule on this request for
18 confidential treatment at the hearing today,
19 but, rather, take the matter under advisement
20 today. And this is largely because we still
21 have a number of questions relative to the
22 request for confidential treatment.

23 As far as the employee names, there
24 are some employee names that are redacted, and

1 some employee names that are not redacted.
2 We'd be interested in trying to understand why
3 that is the case. As far as, in one instance,
4 a project manager is redacted, but another
5 position, I forget, it's project initiator is
6 not redacted. Just questions relative to that
7 type of thing.

8 But, also, with respect to the
9 Critical Energy Infrastructure Information, my
10 understanding is that that is largely a
11 creature of federal law, and would largely
12 apply to the transmission system. And we have
13 some questions about how exactly it would apply
14 to some of the assets which are being sought
15 for confidential treatment here.

16 I know that there are some criteria,
17 loading criteria, and current loading numbers
18 that are redacted in this instance. And I
19 think, I may be incorrect, in other instances,
20 for example, the Unitil 2016 LCIRP, such
21 numbers are open and available to the public.

22 So, we would ask that the Commission
23 not rule on this motion at the hearing today,
24 and take the matter under advisement. And we

1 would hope to be able to iron out some of those
2 questions, with the Company and the OCA, in the
3 technical session that follows.

4 CMSR. GIAIMO: That sounds like a
5 prudent -- a prudent suggestion. So, we'll
6 take you up on that.

7 Mr. Fossum, I actually have some
8 knowledge of CEII clearance from my prior
9 employment. And I am of the belief that we
10 could probably have all interested parties
11 cleared within a week or two. Would that make
12 sense, to the extent that others want the CEII
13 information?

14 I guess I'll pause and hear what you
15 have to think about that.

16 MR. FOSSUM: I will take your word
17 for how that process would happen. I have no
18 specific knowledge of how that's done or what
19 it takes to get those kinds of clearances.

20 I will say, the only parties here are
21 the Staff, the OCA, and the Company. And the
22 only information that they do not have full
23 access to are those ten or so maps. Other than
24 that, everything that they could wish to see

1 they can see in this filing.

2 So, I guess, if the issue is just
3 those maps, I would say, rather than go through
4 the process of trying to get somebody, you
5 know, some appropriate clearance, and then
6 having to manage that clearance, maybe the
7 better course would be, as Mr. Buckley has
8 suggested, let's talk about what we can
9 provide.

10 As I said, I'm open to being
11 corrected on what information we can provide,
12 and perhaps we can address all of this without
13 going through that procedure.

14 CMSR. GIAIMO: Okay. That will be
15 great. And my understanding, again, of CEII,
16 is it's your information to protect. And you
17 have to make sure that you have various
18 safeguards and would have things appropriately
19 labeled. There's also the alternative of
20 having hard copies to be seen, to be seen as
21 well. And, then, there's, obviously, CEII
22 issues.

23 So, all right. Thank you for taking
24 the time.

1 Let's move to positions of the
2 parties. Mr. Fossum, you ready for that?

3 MR. FOSSUM: Thank you. With respect
4 to the motion -- oh, wait. I won't take a
5 terribly long time, but a little background I
6 think is appropriate.

7 Eversource filed its last IRP in mid
8 2015. And after some delay in that docket, it
9 was ultimately approved by Order 26,050, on
10 August 25th, 2017. That order approved a
11 settlement agreement. And inside that
12 settlement agreement was a list of various
13 items that Eversource was to provide along with
14 its next IRP, which was due this year.

15 We fast-forward up to 2019, and to
16 begin looking at the IRP filing that we would
17 be required to make, and the various
18 requirements that would be necessary to fulfill
19 that, we also looked at the Staff, having
20 issued its report in the pending Grid
21 Modernization docket. And among many other
22 recommendations in that report, there's a
23 recommendation that companies might seek
24 waivers of IRPs, as they might be appropriate

1 during the time the Commission worked toward
2 potential revision of the IRP statute and the
3 filing of a new Integrated Distribution Plan,
4 or IDP, in New Hampshire.

5 In view of that recommendation, the
6 other work that remains ongoing in the Grid
7 Mod. docket, in April of this year, Eversource
8 sought a waiver contemplated in the Staff's
9 report. I would note that the Eversource
10 waiver request was not simply based upon the
11 Grid Mod. activity or the Staff's report, but
12 also on the fact that the Company had an
13 upcoming rate case, where many of the issues,
14 that would otherwise be covered in a
15 traditional IRP docket, could be explored.
16 And, indeed, that has happened in that case.

17 June 14th of this year, the
18 Commission issued Order Number 26,262, granting
19 the statutory waiver requested by Eversource.
20 And, in so doing, though, the Commission left
21 in place the settlement items that were beyond
22 what was required in the statute in place. It
23 did so on the basis that those items would be
24 filed for the purpose of ensuring that

1 Eversource was adhering to its commitments made
2 in the prior LCIRP. The filing that sits
3 before you represents Eversource's
4 demonstration that it has, in fact, adhered to
5 those commitments.

6 Eversource's filing addresses the
7 eight, I believe it's eight, items specified in
8 the settlement agreement and order, and has
9 requested that the Commission approve this
10 filing, consistent with Order 26,262 and Order
11 26,050, and Eversource's prior commitments.

12 One final note that I'll make this
13 afternoon is that, in the Commission's granting
14 of the waiver sought by Eversource, it declined
15 to waive the five-year filing requirement in
16 the law. What that means is that, for
17 Eversource, the next IRP filing would be due by
18 June 19th, 2020. The reasons justifying the
19 initial waiver request that it ultimately
20 granted by the Commission continue to exist.
21 And given that, an IRP filing would be due only
22 a few months from now, Eversource would need to
23 begin working very soon to compile the
24 necessary information, for something that may

1 well be mooted out by the Commission's activity
2 relative to the IDP.

3 While we're not requesting anything
4 today, we would ask that the Commission be
5 mindful of that issue as we work through this
6 docket, as well as the Grid Mod. proceeding.
7 Because requiring an unnecessary filing in the
8 middle of next year, which may or may not come
9 after the need for an IDP filing, is not in the
10 best interest of any party.

11 Thank you.

12 CMSR. GIAIMO: Commissioner Bailey.

13 CMSR. BAILEY: Mr. Fossum, doesn't
14 this filing satisfy the five-year requirement?

15 MR. FOSSUM: I could certainly argue
16 that it does. However, I think the Commission
17 was very deliberate in its order on granting
18 the waiver, saying that it declined to waive
19 the five-year requirement. My takeaway from
20 granting a waiver of the "two years from the
21 order" requirement, but leaving in place the
22 "five years from prior filing" requirement,
23 meant that the Commission still believed that
24 that five-year requirement persisted. That was

1 my reading and interpretation.

2 If I'm mistaken in that, I'm more
3 than happy to be corrected. And if this filing
4 satisfies the needs of the statute and the
5 Commission, I would be happy to note that.
6 That is not, however, how we have interpreted
7 the Commission's order.

8 CMSR. BAILEY: Okay. Thanks.

9 CMSR. GIAIMO: Thank you. Mr. Kreis.

10 MR. KREIS: Thank you, Commissioner
11 Giaimo.

12 As I said this morning in the
13 companion Liberty Utilities docket, the Office
14 of the Consumer Advocate is on red alert when
15 it comes to any docket related to least cost
16 integrated resource planning under RSA 378:38.
17 In Order Number 26,262, the Commission granted
18 Eversource's request for a wholesale waiver of
19 most of the LCIRP filing requirements,
20 essentially because the Commission assumed that
21 we will soon be transforming least-cost
22 integrated resource planning to so-called
23 "integrated distribution planning" in the
24 manner now being discussed in the Grid Mod.

1 docket, IR 15-296.

2 We are concerned, and we are
3 therefore alert to any signs in this docket
4 that the Commission has prejudged certain
5 issues that we believe must be adjudicated in
6 the Grid Mod. docket, or somewhere, if the
7 statutory and due process rights of ratepayers
8 are to be respected.

9 We also intend to use this docket,
10 and the companion Liberty proceeding, to
11 explore the extent to which planning processes
12 used by these utilities can be squared with the
13 approach we have proposed by the testimony we
14 have recently filed in the Grid Mod. docket.

15 At the risk of becoming even more
16 tiresome than I might have become this morning,
17 I will repeat a point I have made in every
18 single LCIRP docket in which I have appeared
19 since I became Consumer Advocate almost four
20 years ago. The Commission has reduced LCIRP
21 proceedings to examinations of the adequacy of
22 the capital planning processes used by
23 investor-owned utilities. But RSA 378:39
24 requires the Commission to go farther than

1 that, and to look at "each proposed option", by
2 which the Legislature clearly meant "each major
3 capital investment", for its "potential
4 environmental, economic, and health-related
5 impacts."

6 The overall purpose of least-cost
7 integrated resource planning is to require the
8 Commission to put the utilities to their proof
9 with respect to how they are advancing the
10 state's energy policy, as clearly and plainly
11 articulated in RSA 378:37. That simply is not
12 happening now. And I renew my call for the
13 Commission to follow the Legislature's
14 directives in this docket, and every other
15 LCIRP docket, and in the Grid Mod. docket.
16 Whether you call it "LCIRP" or "IDP", this
17 process cannot remain the rote homework
18 exercise it has been allowed to become, because
19 billions of dollars in ratepayer money is at
20 stake.

21 Let me give you a couple of examples
22 of what I'm talking about. Item number 8 on
23 the Commission's list of material it required
24 Eversource to include in the filing we're

1 talking about here is, and I quote "details
2 regarding the steps taken through each stage of
3 the planning process flow for each of the
4 highest-cost distribution capital
5 projects...within the prior two years, and a
6 demonstration of how the LCIRP plan was
7 followed through the planning process."

8 In response, Eversource provided
9 materials related to three projects, the first
10 of which was the Webster/Daniel substation
11 upgrade. Attachment I of the Company's filing
12 is a heavily redacted document entitled
13 "Webster Substation Review", bearing the odd
14 date of "June 24th, 2019". That date makes no
15 sense, because this is a project that went into
16 service in 2018.

17 If you look at Bates Page 058 of the
18 Company's filing, you'll see that under "new
19 large customers", it refers to "the Northern
20 Pass Converter Station" as "expected to add
21 another megawatt of station service load to the
22 3548 line by 2019." That station service load
23 is, obviously, not going to materialize, and
24 yet this Company invested \$20 million based on

1 the expectation that it would.

2 Then, if you look at Bates 065, you
3 will see the cursory treatment that non-wires
4 alternatives received. "Would only delay
5 spending", "not a long-term solution" say the
6 distribution planning folks at Eversource, as
7 if that's a bad thing. Which, of course, it
8 is, but only if your objective is to get as
9 many toys into rate base as possible.

10 The same troubling attitude is
11 reflected in Attachment E, which appears at
12 Bates Page 045, Eversource's reply to the
13 instruction to supply "the company's evaluation
14 of targeted energy efficiency solutions for
15 potential projects for 4 and 12 kV substations
16 due to loading." If the cursory information
17 presented there is truly the full extent of
18 this Company's consideration of non-wires
19 alternatives to these projects, well, all I can
20 say is that something is terribly wrong. Or,
21 these documents are just rote responses to a
22 homework assignment, and somewhere else the
23 Company's real capital planning process is
24 unfolding.

1 This cannot persist. One way or
2 another, we are going to have to transform
3 least-cost integrated resource planning in
4 which this investor-owned utility is held
5 publicly accountable for the way it spends
6 billions of dollars in ratepayer money.

7 And let me just say in response to
8 what I heard Mr. Fossum say earlier. I agree
9 with his interpretation of the Commission's
10 prior determination about LCIRP waiver. The
11 Company is obliged to file a full Least-Cost
12 Integrated Resource Plan by June 19th of 2020.
13 And whether you think of that as a few months
14 from now or almost a year from now, that is, in
15 fact, a correct interpretation of the
16 determination that the Commission has
17 previously made. And Mr. Fossum asked the
18 Commission to be "mindful" of the implications
19 of that requirement. I ask Eversource to be
20 mindful of that, and take reasonable positions
21 in the Grid Mod. docket, so that everybody,
22 meaning all the stakeholders, can come to a
23 reasonable set of understandings about how this
24 process should proceed in the future under the

1 flag of integrated distribution planning.

2 That's all I have to say at present.

3 CMSR. GIAIMO: Mr. Kreis, thank you.

4 And, at first, it felt like *déjà vu* all over
5 again, but the last half of your soliloquy was
6 new. So, thank you for providing your
7 feedback.

8 Mr. Buckley.

9 MR. KREIS: And thank you for
10 noticing.

11 MR. BUCKLEY: Thank you, Commissioner
12 Giaimo.

13 Staff is still evaluating the issues
14 presented in the instant petition. But I
15 identify today, for the Commission, some of the
16 matters, which it initially intends to explore
17 with the Company through the technical session
18 and procedural schedule that follows today's
19 hearing.

20 This includes substantive issues
21 relating to whether the Company's filing is in
22 compliance with the Commission directives
23 contained in Order Number 26,262; changes that
24 appear to have occurred since the Commission's

1 approval of the Company's 2015 LCIRP, including
2 changes to the Company's load forecasting
3 methodology and planning criteria; how the
4 Company defines whether an upgrade relates to
5 capacity or reliability conditions and needs;
6 the sufficiency of the area planning studies
7 the Company has put forward in its testimony as
8 examples; and, in agreeance with the statements
9 of the Consumer Advocate a moment ago, whether
10 the Company actually plans its distribution
11 system in a way that allows for the use of its
12 TD190 policy, and consideration of least-cost
13 alternatives to otherwise planned capital
14 investments.

15 And just as an aside, there has been
16 discussion from both the Company and the Office
17 of the Consumer Advocate as to whether the
18 deadline for the five-year filing might still
19 stand. I would add to that that the
20 Commission, in its recent order waiving and
21 directing the Company to provide a more limited
22 form of LCIRP with this filing, made no
23 reference to a previous commitment it had
24 approved related to grid needs assessments that

1 each of the companies would have to file within
2 their next LCIRP. So, I think it remains an
3 open question as to whether such grid needs
4 assessments would have to be filed in the next
5 LCIRP to be filed by the Company in the Summer
6 of 2020, as has been mentioned by both the
7 Company and OCA. So, I would just note that
8 for the Commission as well.

9 Those issues having been covered,
10 Staff looks forward to addressing these, and
11 other issues, in the technical session and the
12 procedural schedule that will follow.

13 Thank you.

14 CMSR. GIAIMO: Thank you, Attorney
15 Buckley.

16 So, wrapping up, we'll take your
17 position with respect to the Motion for
18 Confidential Treatment under advisement when we
19 get it, and provide guidance in that regard as
20 soon as possible.

21 Unless there is any other business?
22 Pausing for any? None?

23 *[No verbal response.]*

24 CMSR. GIAIMO: And seeing none, we'll

1 adjourn the prehearing conference and leave you
2 to your technical session. Thank you.

3 ***(Whereupon the prehearing***
4 ***conference was adjourned at***
5 ***2:09 p.m., and a technical***
6 ***session was held thereafter.)***

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