

P R O C E E D I N G S

1
2 **CHAIRMAN BROWN:** Moving along to the last item
3 on the agenda, which is Item 3, and we have several
4 parties here that wish to speak on this item.

5 Good morning.

6 **MR. BARRETT:** Good morning, Commissioners.
7 I'm Michael Barrett from the AFD staff.

8 Item 3 is a joint petition from Duke Energy
9 Florida, Florida Power & Light Company, Tampa Electric
10 Company, and Gulf Power Company seeking approval of
11 modifications to their respective risk management plans.
12 The petitioning parties assert that the request responds
13 to the Commission's directive to explore possible
14 changes to their hedging programs to minimize the
15 potential losses to be recovered from customers in
16 periods of falling natural gas prices. There have been
17 no customer comments filed in this docket, although OPC
18 and FIPUG have intervened in this case and may wish to
19 address you.

20 The parties are present as well. James
21 Beasley, representing Tampa Electric Company, has
22 introductory remarks on behalf of the petitioners.
23 Staff recommends approval and is available to address
24 your questions.

25 **CHAIRMAN BROWN:** Thank you, Mr. Barrett.

1 Hello.

2 **MR. BEASLEY:** Thank you, Madam Chair,
3 Commissioners. Jim Beasley for Tampa Electric Company,
4 and as Mr. Barrett indicated, I'd like to present some
5 brief opening comments on behalf of the four joint
6 petitioners.

7 We support your staff's recommendation. We
8 believe the actions proposed in the joint petition will
9 accomplish two objectives. First, it will continue the
10 Commission's hedging objective, which is to reduce
11 customers' exposure to price volatility, and, secondly,
12 it will honor the directive contained in your 2015 fuel
13 adjustment order asking us to review possible changes to
14 reduce potential hedging losses borne by our customers.

15 We believe that by reducing a utility's
16 maximum percentages of hedged natural gas procurement
17 and adjusting the period of time over which those hedges
18 are made, we will reduce customer exposure to hedging
19 losses and at the same time continue to provide
20 protection from the impacts of price volatility. We
21 believe this is a reasonable and balanced approach, and
22 we would urge your approval. We're here to answer any
23 questions you may have.

24 **CHAIRMAN BROWN:** Thank you. Office of Public
25 Counsel.

1 **MR. SAYLOR:** Thank you, Madam Chairman. Good
2 morning, Commissioners. My name is Erik Saylor with the
3 Office of Public Counsel on behalf of the customers in
4 this matter.

5 In 2015, the Office of Public Counsel took the
6 position that natural gas financial hedging activities
7 should be discontinued due to the enormous losses that
8 have been incurred by the utilities that the ratepayers
9 have paid for as a result of these activities.

10 The companies' joint petition to modify the
11 plan does not change our position. The cost of
12 financial hedging activities still greatly outweigh any
13 potential benefits that the customers may receive from
14 hedging.

15 We would like to note that in response to some
16 discovery that we served as it relates to the 2016
17 hedging loss, the companies are projected to lose
18 another \$560 million of the customers' money. That
19 brings the total natural gas hedging losses to just a
20 little over \$6.6 billion. \$6.6 billion of hedging
21 losses. And that concludes our remarks. Thank you.

22 **CHAIRMAN BROWN:** Thank you, Mr. Saylor.

23 Mr. Moyle, good morning.

24 **MR. MOYLE:** Good morning, Madam Chairman.
25 Thank you for the chance to address you. And this is a

1 PAA, so interested parties can share thoughts and
2 comments, and on behalf of the Florida Industrial Power
3 Users Group, it's my privilege to do so.

4 A number of you have served in the legislature
5 previously, and there is a tentative law that says one
6 legislature can't bind another legislature. And it
7 makes sense because when you all are up there making
8 decisions, it's your prerogative to make judgment calls
9 as you see fit. The corollary, one Commission can't
10 bind another Commission, I would submit to you is also
11 applicable and true.

12 And I say this because in reading your staff
13 recommendation, I kind of wanted to back up and say, you
14 know, how did we get here today where we're talking
15 about -- Mr. Saylor says 6.6 billion? You know, the
16 hedging is supposed to work in a way where it evens out
17 over a period of time. And since it's been in place
18 since 2002, it doesn't appear to be looking like it's
19 evening out with -- to the tune of 6.6 billion in
20 losses.

21 But what struck me was this Commission has
22 been in existence for a long, long time. These
23 utilities who are represented here today have been in
24 existence for a long, long time. Hedging has not been
25 in existence for a long, long time. It came into being,

1 as your staff points out, I think, in 2002 as a result
2 of some price volatility with respect to fuel prices in
3 2001 and 2000. So, you know, at that point in time,
4 probably a very good reaction to price volatility.

5 The facts on the ground have changed. You all
6 have had briefings and I know about the advents in
7 extraction technology for natural gas, the abundance of
8 natural gas. There is a lot of natural gas. I agree no
9 one can predict what the future prices of natural gas
10 are going to be, but the facts today are much different
11 than they were in 2001 and 2002. And I state that to
12 emphasize that we think it's time to do away with
13 hedging. It is not working well for consumers. It's a
14 big loser for consumers. And I did a little bit of a
15 different tally on numbers -- we had a lot of discussion
16 last year -- you know, I had the number close to
17 6 billion.

18 The way it works is utilities will file their
19 testimony, I think it's in April, and they'll say here's
20 what the results were for the last year. So for 2015,
21 in April they gave you a filing for what 2015 looked
22 like. And the total tally numbers for 2015, based on
23 what I extracted from their filings was: FP&L,
24 \$504 million in losses; Duke, \$226 million in losses;
25 Gulf, 50 million in losses; and TECO, 40 million. I

1 think it was 38.8, but, you know, 400 (sic) million for
2 a total of 820.

3 Now Mr. Saylor just said that in the response
4 to discovery it's looking like another 560. So the
5 time -- between the time you all were considering this
6 last year and now, it looks like we're looking at
7 1.3 billion, okay, which is 1.3 billion in losses going
8 in a way that hurts the consumers.

9 You all last year in your order suggested that
10 efforts be taken to minimize hedging losses. The
11 utilities have filed something to reduce hedging
12 exposure. I know Commissioner Edgar always says "words
13 matter," and they do. And I would suggest that
14 minimization is different from reduction. I mean,
15 minimization is you can take a lot more aggressive steps
16 than proposing, you know, a 25 percent reduction.

17 And I think the, you know, the 25 percent
18 reduction -- I looked up on Google the definition of the
19 phrase "half measure," and again I'm revealing the
20 source, so take it for what it's worth, but it defines
21 it as an action or policy that is not forceful or
22 decisive enough. And I would submit to you that what
23 the utilities have filed is -- I'm not even sure it's a
24 half measure. It might be a quarter measure because
25 it's a 25 percent reduction, and it doesn't get us where

1 we need to be. You know, we have maintained and will
2 continue to maintain that hedging ought to just be done
3 away with. I mean, you guys can look at it and say
4 "There are different facts on the ground than 2001.
5 We're not going to continue it." If things change five
6 years from now, another Commission could be free to look
7 at it and say, well, you know, maybe we need to do it.

8 So our message is please discontinue hedging.
9 They have huge losses; they continue. And in terms of
10 what this is proposing is -- I've used the phrase, you
11 know, "stop the bleeding." You know, we continue to
12 bleed significant dollars.

13 I know, Commissioner Edgar, I appreciate your
14 interest for the ratepayer money on the last agenda
15 item, and it was, you know, less than a million dollars.
16 I mean, here we're talking, you know, numbers that start
17 with Bs. And so, you know, we really are urging you to
18 take strong measures and to discontinue hedging, and so
19 we would ask that you take that action.

20 You know, the suggestion by the utilities is
21 putting a Band-Aid on a, you know, on a gaping gunshot
22 wound. It's just not going to get us there, and we
23 would ask that you go further than what the utility has
24 proposed. Thank you.

25 **CHAIRMAN BROWN:** Thank you, Mr. Moyle.

1 Staff, would you like to provide any response
2 or comments before we bring it back to the bench?

3 **MR. BARRETT:** Commissioner, the only thing I
4 would add is I did -- Mr. Moyle did accurately express
5 the 2015 results.

6 **CHAIRMAN BROWN:** So those total -- can you
7 read that total again?

8 **MR. BARRETT:** I have them by company. I don't
9 have the total. He may have to express the total. But
10 for all of 2015, hedging activities for Duke Energy
11 Florida was a hedging cost of 260 -- excuse me --
12 \$226 million; for Florida Power & Light, hedging costs
13 of \$504 million; for Gulf, hedging costs of \$50 million;
14 and for Tampa Electric Company, hedging costs of
15 \$39.8 million, so you might as well call it \$40 million.

16 **CHAIRMAN BROWN:** Okay. Thank you. So
17 bringing it back to the bench, I do have a question for
18 staff really, and my decision on this really rests on
19 your answer that I'm going to seek here.

20 Modifying the 2006 (sic) risk management plan
21 does, from my discussion earlier with you in my
22 briefing, does -- potentially could provide some
23 savings; is that correct? 2016.

24 **MS. BROWNLESS:** Yes, ma'am. It could
25 potentially provide some savings, assuming that the

1 price of natural gas for the last six months of this
2 year remains lower than the hedged price.

3 **CHAIRMAN BROWN:** So what does this really do
4 for 2017 and 2018? Are we going to have the ability to
5 reassess, look at the 2017 and 2018 in this year's fuel
6 clause?

7 **MS. BROWNLESS:** Yes, ma'am. My understanding
8 of what this limited petition is, it is a request to, on
9 the part of TECO, Gulf Power, and FP&L, to modify their
10 2016 risk management plans which were previously
11 approved last year in the fuel adjustment clause and
12 allow them to reduce their hedging ranges by 25 percent.
13 My understanding is that Duke, DEF, believes that their
14 plan does not have to be modified because they have a
15 wide enough range to accomplish that goal without
16 further modification, but they support in theory such a
17 reduction.

18 **CHAIRMAN BROWN:** Okay. So if this petition is
19 protested, then we will revisit that during this year's
20 fuel clause proceeding.

21 **MS. BROWNLESS:** Yes, ma'am. If this petition
22 is protested, then it will be as if this proposal was
23 never -- well, let me back up and say let's assume that
24 the Commission votes to approve the relief requested and
25 then the PAA is subsequently protested, then there will

1 be a de novo proceeding which will be in the fuel clause
2 to address this issue. From a practical standpoint,
3 there will be no modifications to 2016 hedging
4 percentages, and you will go forward and assess the 2017
5 risk management plans which will be filed by the
6 companies in August of this year.

7 **CHAIRMAN BROWN:** Okay. Thank you.

8 Commissioner Graham has a question.

9 **COMMISSIONER GRAHAM:** Thank you, Madam Chair.

10 First, I guess I want to applaud the utilities
11 for coming forward with this. I guess you did hear us
12 last November. I was looking at a number -- I guess in
13 my head I was thinking of a number closer to 50 percent
14 than 25. But what do they say about beggars being
15 choosy? I think this brings us a step forward. Rather
16 than just kind of sitting back and us talking to deaf
17 ears, you guys came together. And I know it's not easy
18 for all of you to come together and come up with an
19 overall plan, so I applaud you for that.

20 I agree, and this is a difficult thing for me
21 to say, somewhat with Mr. Moyle --

22 **MR. MOYLE:** I'll take it.

23 (Laughter.)

24 **COMMISSIONER GRAHAM:** -- that maybe we could
25 have done more. But overall this is better than not,

1 you know, from the things that I saw. We're stepping
2 that direction. We can look at those numbers again at
3 the end of this year and make another determination.
4 And I know everybody -- they'll say do more now than
5 later. And I tend to move cautiously, so taking these
6 kind of steps I don't have a problem with. I do have a
7 problem with the numbers, but hedging was the decision
8 that was made and, as was said earlier, it's a decision
9 that we can always change. But let's just
10 systematically figure out a way how we're going to get
11 there, and I see this as being the first step.

12 **CHAIRMAN BROWN:** Thank you, Chairman Graham.
13 And I concur with your -- some of your comments there.
14 I do think this is a fair start. And I did think a
15 higher percentage. I was hoping somewhere around the
16 50 percent mark too. But I appreciate you bringing
17 these -- and I'd like to see what these reductions
18 actually show so that we can reassess it. I'm looking
19 forward -- some of the concerns I have in these are the
20 duration. My big -- and they vary by utility. Some of
21 these are very long-term duration. TECO is the only one
22 that really made a robust, so to speak, effort on
23 shortening the term, and I appreciate that. The other
24 utilities were not able to come to a consensus. Is
25 there a reason for that, Mr. Beasley?

1 **MR. BEASLEY:** I'm not certain. Just a
2 different manner they implement their own programs, I
3 would assume.

4 **MR. BUTLER:** Madam Chair, I would note for FPL
5 that we were already kind of at the short end, and so it
6 didn't make sense to go shorter than we already were.
7 But we're certainly committed to staying short.

8 **MR. BADDERS:** And for Gulf, our -- just the
9 way we hedge may be a little different. I'm not
10 familiar with each of the other companies' program. We
11 will go back and we'll look at that -- the duration of
12 what we're hedging and see if we can work with that.

13 **CHAIRMAN BROWN:** Specifically Gulf.

14 **MR. BADDERS:** Yes.

15 **MR. BERNIER:** And for DEF it's the same thing.
16 We're layering hedging transactions over time, and we
17 felt that by reducing the percentage, we were getting
18 closer to where the Commission seems to want us to head.
19 But it is something that we will continue to look at.

20 **CHAIRMAN BROWN:** Can you tell me kind of how
21 you derived the 25 percent reduction figure?

22 **MR. BEASLEY:** It was a judgment call that we
23 all got together and thought that would be a reasonable
24 way to proceed. And it's -- there's no math to it.
25 It's just a judgment on what would be a reasonable and

1 meaningful shift.

2 **CHAIRMAN BROWN:** Okay. Thank you.

3 Commissioner Brisé, followed by Commissioner
4 Edgar.

5 **COMMISSIONER BRISÉ:** Thank you.

6 So to the companies, would a 50 percent be a
7 reasonable judgment call to you? I mean, you don't have
8 to make that call today. You can recall the petition
9 and come back to the Commission. If you hear from us
10 that 50 percent is more reasonable to us, does that
11 present a problem in terms of timing or anything of that
12 sort?

13 **MR. BEASLEY:** Commissioner, just from my
14 standpoint, I would have to consult with our client and,
15 of course, can't make a judgment on that myself here
16 today, but we hear you.

17 **MR. BUTLER:** Speaking for FPL, sort of the
18 same thing. I certainly am not in a position to agree
19 to a 50 percent sitting here at the counsel's table.

20 One other thing I want to be sure that is
21 understood, though, that relates both to your point and
22 one that's kind of embedded in the recommendation, we
23 are hedging now for 2017 and we're already pretty deeply
24 into it. The longer this gets delayed, the deeper we
25 will be. And obviously the question of what to approve

1 for hedging next year will be addressed at the annual
2 fuel hearing. But if we don't move pretty quickly --
3 for example, if we were directed to come back with a
4 different petition, we're just going to be losing more
5 time that we could be reducing hedges being placed this
6 year.

7 And then that brings me to an issue I just
8 want to be sure you're aware of about this petition,
9 which is that, you know, paragraph 13 in it talks about
10 our implementing the reduction in hedges that we are
11 proposing 15 days after the vote if the Commission were
12 to approve our proposal. But after discussing this with
13 staff and, you know, hearing some of the strong
14 objections that OPC and FIPUG have raised here, we
15 really have to wait and see whether this gets protested.
16 Because if it were protested, our understanding is that
17 the Commission precedent is treating, you know, the PAA
18 order as a nullity. So we'd be having reduced our
19 hedges without there basically being any authority to do
20 so until the protest was resolved, and apparently that's
21 not going to be until, you know, the fuel hearing.

22 So where we are is I think to get reductions
23 in place at a point where they actually do something for
24 this year, sort of, one, need to stick with what we have
25 filed and, number two, for there not to be a protest of

1 it. Otherwise, realistically we're really talking about
2 what we'll do -- what you direct us to do as reductions
3 for hedging next year.

4 **CHAIRMAN BROWN:** Okay. Thank you.

5 Commissioner Brisé.

6 (No response.)

7 **COMMISSIONER EDGAR:** I find this item somewhat
8 perplexing. I, as was Commissioner Graham, I appreciate
9 the companies coming forward with a joint request or
10 recommendation or suggestion, whichever is the
11 appropriate word. Since the very long discussion that
12 the Commission had on this item the last time, I know my
13 office has asked staff many times "Where are we on
14 this?" I believe that we were clear as a body when we
15 approved the 2016 mitigation plans that we were asking
16 for suggestions and recommendations as to how to further
17 limit customer exposure to risk, and I think those words
18 are meaningful, Mr. Moyle.

19 I know that -- and I know we all are cognizant
20 that this is also an issue that many other state
21 commissions and utility companies are looking at and
22 examining and grappling with across the country. I have
23 asked staff a number of times to, for the benefit of my
24 understanding, look at what some of those things are
25 that other state commissions are considering. Quite

1 frankly, I have yet to receive anything on that, but I
2 have asked for it since January.

3 You know, this may be the right first step. I
4 don't know. 25 percent, 50 percent, candidly, there's
5 not enough information in here for me to make a
6 reasonable judgment call as to what that right number
7 is. I recognize that our staff is recommending
8 approval, but with no analysis as to what a different
9 percentage amount reduction would be.

10 I also think that whatever decision we make
11 today is, as Mr. Butler has very appropriately, thank
12 you, pointed out, will probably have a great impact on
13 what we will see for the 27 mitigation plans, which is
14 right around the corner. And I think that that
15 should -- that we should all be fully cognizant of that.

16 So with that, I once again feel like we don't
17 really have enough information before us, which I find
18 frustrating because it's been since November, and some
19 of the information that I've requested has not been
20 supplied by staff. But I recognize that time is of the
21 essence as well, if, indeed, we are going to be able to
22 make any meaningful changes for this year. So with
23 that, when you, Madam Chairman and my fellow
24 Commissioners, are ready for a motion, I will be
25 prepared to make one, if that is your will.

1 **CHAIRMAN BROWN:** Commissioners, any other
2 comments?

3 Commissioner Graham.

4 **COMMISSIONER GRAHAM:** Well, back to the
5 comment about this being a PAA, I mean, I understand
6 that and I realize that. Of course, I can't imagine why
7 if anybody wanted to get rid of hedging would protest
8 this, because it may not be a full step in the right
9 direction, it may be a half step in the right direction,
10 but it's still a step in the right direction. So
11 protesting this doesn't benefit anybody, I think, that's
12 against hedging. I just -- I think protesting it just
13 basically protests it. And so I can't say that it's not
14 going to happen, but I just -- it doesn't make sense to
15 me.

16 **MR. BUTLER:** Well, from discussions with --

17 **CHAIRMAN BROWN:** Mr. Butler.

18 **MR. BUTLER:** Is that directed -- if it's not
19 --

20 **COMMISSIONER GRAHAM:** Yes. Yes.

21 **MR. BUTLER:** From discussions with Office of
22 Public Counsel and FIPUG and staff earlier on this, it
23 was my impression that both Public Counsel and FIPUG
24 were still considering whether to protest. I mean, I
25 agree with you, sort of logically it seems that the half

1 a loaf is better than none and it shouldn't be
2 protested, but it's obviously not my decision to make.
3 And I was simply wanting to express the cautionary note
4 that with the potential for the protest, we would
5 obviously have to wait to see whether that came before
6 we could move forward so that we didn't get caught with
7 having done something that's different than our approved
8 plan and no order that's directing us to change our
9 approved plan.

10 Because, of course, this could turn. I mean,
11 if fuel prices went up and we end up reducing hedging
12 percentages compared to what we had approved, that won't
13 look like a good thing. So we need to be sure that we
14 have direction that we understand and, you know, is
15 official action of the Commission before we can move
16 forward. That is the only point that I was making.

17 **CHAIRMAN BROWN:** Mr. Moyle.

18 **MR. MOYLE:** Thank you. If I could just
19 comment. I have had the privilege of working with
20 Mr. Butler for a long time and, you know, we're talking
21 about serious matters here, but I can't pass up the
22 opportunity to suggest that his analogy of a half loaf
23 might be better stated as to a quarter loaf because
24 that's what we have. And --

25 **MR. BUTLER:** I thought about saying that but

1 decided not to.

2 **MR. MOYLE:** But the point about the protest, I
3 just want to try to make a couple of comments and also
4 put them on the record because we want change now, but
5 we're in a little bit of a pickle because we want
6 hedging stopped. So if you all vote and say, well, we
7 think it should be 25 percent, I think you can, you
8 know, say up to 50 percent and provide some discretion.
9 I don't know that you've got to peg the number, and give
10 them a little bit of judgment. But if you do act to
11 take a step to, you know, minimize customer risk, our
12 objective is just do away with it completely.

13 And it sounds, based on what Commissioner
14 Edgar says, that there's maybe a lack of information on
15 certain key points and that, you know, this may be
16 appropriate for a protest to get a lot of facts out
17 there and then make the best informed decision that can
18 be made, you know, about hedging. So we will have to
19 take a consideration of what to do based on your
20 decision.

21 But I do want to make this representation, you
22 know, on the record that to the extent, you know, you
23 all adopt something that says we're going to reduce it
24 by 25 or 50 percent and there is a protest, you know,
25 filed, FIPUG would waive its right to challenge any kind

1 of, you know, reduction. If they said voluntarily
2 they're going to do 25 percent, you know, we're not
3 going to come in and say, well, they did 25 percent,
4 give this money back, or anything like that. I mean,
5 that -- I want to put that on the record so that if that
6 gives them some comfort or ability, they're smart
7 lawyers, to figure out a way even with a protest where
8 the protest is designed to look at the issue
9 holistically based on full information. We don't want
10 to slow up, you know, a baby step in the right
11 direction. So that was the point that I wanted to make.

12 The other is we get it that natural gas prices
13 potentially could go up, and I don't want anyone to say,
14 well, you know, you were up here advocating this
15 position when prices were going down and ratepayers were
16 losing money. What if the shoe was on the other foot
17 and, you know, you could be saving money? We understand
18 that there's risk and it's bilateral, it goes both ways.
19 We'll take that risk. You know, we will take that risk.
20 We understand it, we get it, and if it works against us,
21 you know, welcome to the NFL. But I don't want there to
22 be any lack of clarity on that point either.

23 **CHAIRMAN BROWN:** Thank you, Mr. Moyle, for
24 that.

25 Commissioners, any other comments or

1 questions? And I think we're ripe for a motion at this
2 time. Commissioner Edgar.

3 **COMMISSIONER EDGAR:** Thank you, Madam Chair.

4 Again, I -- this is a very, very complex
5 issue, lots of moving parts, and the calendar and the
6 timing of all of it is an important piece of it as well.

7 I would point out again that my understanding
8 and my thinking is that the purpose of hedging is to
9 reduce the impact to ratepayers due to fuel cost
10 volatility. And historically for many years fuel costs,
11 primarily natural gas, were very volatile, as Mr. Moyle
12 and others have pointed out. In recent years that has
13 minimized, but none of us have that crystal ball. I do
14 believe that we need to continue to examine ways to, if
15 possible, further limit customer exposure to risk with
16 hedging, but certainly with anything, with every program
17 and every circumstance but with hedging as well. So
18 just as one Commissioner, I would ask our staff and the
19 companies to continue, and I know they will, to look at
20 these issues. It will be coming back to us in other
21 ways over the next few months and probably the next few
22 years. Let's look at what other states are considering
23 as well and continue to examine this issue.

24 But for where we are today, I, again,
25 appreciate the companies working together and being

1 responsive to our request for recommendations as to
2 potential change, and I would move approval of the staff
3 recommendation on all items.

4 **CHAIRMAN BROWN:** Okay. Thank you. Is there a
5 second?

6 **COMMISSIONER PATRONIS:** Second.

7 **CHAIRMAN BROWN:** Okay. Any further
8 discussion? All those in favor, say aye.

9 (Vote taken.)

10 Opposed? The motion passes.

11 Thank you to the parties for coming today.

12 Thank you.

13 And that concludes our Commission Agenda
14 Conference. We will be having Internal Affairs at a
15 time certain at 1:00 in the IA room. And so with that,
16 happy summer, happy holidays to everybody, happy
17 weekend. Enjoy.

18 (Commission Conference adjourned.)
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1 STATE OF FLORIDA)
2 COUNTY OF LEON) : CERTIFICATE OF REPORTER

3
4 I, LINDA BOLES, CRR, RPR, Official Commission
5 Reporter, do hereby certify that the foregoing
6 proceeding was heard at the time and place herein
7 stated.

8 IT IS FURTHER CERTIFIED that I
9 stenographically reported the said proceedings; that the
10 same has been transcribed under my direct supervision;
11 and that this transcript constitutes a true
12 transcription of my notes of said proceedings.

13 I FURTHER CERTIFY that I am not a relative,
14 employee, attorney or counsel of any of the parties, nor
15 am I a relative or employee of any of the parties'
16 attorney or counsel connected with the action, nor am I
17 financially interested in the action.

18 DATED THIS 13th day of June, 2016.

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25


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