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CALIFORNIA ENERGY COMMISSION

In the matter of:

General Rulemaking Proceeding)	
for Developing Regulations,)	Docket No. 23-OIR-03
Guidelines, and Policies for)	
Implementing SB X1-2 and)	
SB 1322)	
_____)	

STAFF WORKSHOP ON SB X1-2 PRE-RULEMAKING

REMOTE VIA ZOOM

TUESDAY, NOVEMBER 12, 2024

10:00 A.M.

Reported by:

Martha Nelson

APPEARANCES

CEC STAFF

Jeremy Smith, Deputy Director, Energy Assessments Division

Aria Berliner, Special Advisor to Vice Chair Gunda

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1 P R O C E E D I N G S

2 10:00 a.m.

3 TUESDAY, NOVEMBER 12, 2024

4 MR. SMITH: Good morning everyone. We're going
5 to wait until a little bit after ten o'clock to give
6 everyone time to join.

7 (Pause)

8 MR. SMITH: All right, let's go ahead and get
9 started.

10 Once again, good morning everyone and thank you
11 for joining this California Energy Commission workshop. My
12 name is Jeremy Smith. I'm a Deputy Director in the Energy
13 Assessments Division. In this webinar, I'll present draft
14 data regulations and reporting requirements currently in
15 development under the SB X1-2 Emergency Rulemaking. The
16 topics included are the three-month projections for
17 refiners and major marketers, as well as refinery
18 maintenance reporting guidelines.

19 Before we get any further, I'll share some
20 housekeeping items with everyone.

21 First, please be aware this meeting is being
22 recorded.

23 Second, comments are welcome at the end of the
24 presentation. At that time, if you do have a comment,
25 please use the raised-hand feature in Zoom. Someone on our
26 team will call on you. You'll unmute your microphone and

1 you can provide your comment. For phone participants, you
2 can dial star nine to raise your hand and star six to mute
3 and unmute your line. When you do speak, please start by
4 spelling your name and providing your affiliation before
5 beginning your comment. We'll present a slide with these
6 instructions when it's time for public comment.

7 The purpose of today's workshop is to receive
8 public input on draft data regulations and data collection
9 forms, either through oral comments shared today or through
10 written comments submitted to docket 23-OIR-03 before 5:00
11 p.m. on December 9th, 2024.

12 I'll provide an overview of draft language for
13 emergency data regulations and draft data collection forms
14 for refiner and major marketer three-month projections and
15 refinery maintenance.

16 The goal of the three-month projection
17 regulations is to provide the CEC as the state's primary
18 energy policy and planning agency the forward visibility to
19 identify potential supply constraints in the California
20 transportation fuels market that could lead to price spikes
21 like those observed in late summers 2022 and 2023, as well
22 as spring 2024.

23 Our mission is to be objective, improve our
24 understanding of how the industry and market operates under
25 certain conditions, and follow the facts to protect

1 Californians from price spikes that might occur due to
2 market illiquidity or other issues.

3 The goal of the updated Refinery Maintenance
4 Guidebook, which includes instructions on how refiners
5 notify the CEC of planned and unplanned maintenance events,
6 is to improve tracking of events and clarify the reporting
7 requirements based on feedback we have received from
8 industry.

9 This is the agenda for today's webinar. I'll
10 start by providing some background on and purpose for these
11 data regulations, the rulemaking process, and the relevant
12 data collection topics we're covering today.

13 I'll then go through each of the following three
14 data collection topics, three-month projections for
15 refiners, three-month projections for major marketers, and
16 refinery maintenance reporting guidelines. For each topic,
17 I'll begin by discussing the draft regulations and
18 reporting requirements. Afterwards, I'll demonstrate the
19 proposed forms.

20 Then, I'll share the next steps, and we'll close
21 the presentation with a public comment period.

22 Let's start by going over some of the background
23 on the rulemaking process and data collection efforts.

24 With the passage of Senate Bill X1-2 in 2023, the
25 legislature provided the CEC with emergency rulemaking

1 authority to support the many implementation activities the
2 law calls for. This includes the majority of data collected
3 under the Petroleum Industry Information Reporting Act, or
4 PIIRA for short, analysis and reporting requirements,
5 confidentiality requirements, enforcement authority, and
6 the timing of turnaround and maintenance rules. The draft
7 regulations discussed today are all contained in California
8 Code of Regulations, Title 20, Chapter 3, Article 3.

9 The one exception to this is that the refinery
10 maintenance activity reporting is exempt from the
11 Administrative Procedure Act, so the CEC may institute new
12 rules through a guidebook. This draft guidebook is also
13 part of the scope of today's workshop.

14 The CEC has numerous forms to collect data from
15 the petroleum industry. These generally fall into the
16 following four categories: refinery costs and profits,
17 which informs the California Oil Refinery Cost Disclosure
18 Act Monthly Report, and whether a maximum refiner margin
19 should be set; market analysis, which informs whether there
20 is market manipulation or market failures; refinery
21 maintenance, which provides insights into the timing and
22 impact of planned and unplanned outages; and finally, other
23 miscellaneous data.

24 There are four forms we're discussing today.
25 Under Refinery Maintenance are the planned and unplanned

1 maintenance and turnaround reports. Under Other Data, we
2 have the two newly proposed forms, the Refinery Three-Month
3 Projection and Major Marketer Three-Month Projection
4 Reports.

5 All relevant files discussed today were posted to
6 the docket last week. Please note all the regulations and
7 forms presented during this workshop are drafts, so even if
8 I say things like new or updated, please know none of these
9 changes have been adopted, nor are final.

10 Before we discuss the draft rules and associated
11 forms, I just briefly wanted to share some of the things
12 we're doing to improve data collection, to reduce burden on
13 industry, improve accuracy of the data collected, and
14 expedite data processing and analysis.

15 Our current data submission portal, which
16 launched in June 2023, is a secure drop box where industry
17 can upload reports. While this was an improvement in both
18 security and tracking of submitted reports, the process to
19 validate, aggregate, and analyze the data is time intensive
20 and requires a lot of manual intervention.

21 Many of the existing PIIRA data collection forms
22 were not designed to be machine readable, meaning reporting
23 entities need to either design systems to export data in a
24 specific format or enter data into the forms manually,
25 which increases the likelihood of errors.

1 To address this, staff are designing new forms to
2 be filled in and submitted as flat files, meaning the data
3 is stored in a two-dimensional database structure where
4 columns represent different values, the first row has the
5 column headers, and all subsequent rows represent separate
6 records. Forms designed in this way will be easier for
7 industry to export information from a database and will
8 make for much easier data storage once received by CEC.

9 Further, staff have begun developing pre-
10 validation worksheets in which industry can paste their
11 data to ensure it meets the reporting requirements. One
12 such example is the D354 spot market report tool, which has
13 been demonstrated and shared with numerous reporting
14 entities.

15 We'll continue to improve instructions to ensure
16 reporting requirements are clear and hope to establish
17 strong relationships with all reporting entities so any
18 issues with data collection can be easily addressed.

19 Let's now discuss the draft regulatory language
20 and forms for the three-month refinery and major marketer
21 projections.

22 Under California Code of Regulations Title 20,
23 Section 1363.2, this is the Specific Definitions for
24 Purposes of Reporting Requirements, we've proposed a minor
25 clarification to the definition of a Major Petroleum

1 Products Marketer or Major Marketer for short. The intent
2 is to clarify that individual service stations and truck
3 stops that sell less than 20,000 barrels of petroleum
4 products are excluded from this reporting requirement, but
5 chains of service stations or truck stops that exceed that
6 threshold are required to report.

7 We want to make it clear it is not our intent to
8 collect forms from small individual service stations. We
9 are open, however, to feedback on whether the 20,000 barrel
10 threshold is appropriate or needs to be adjusted.

11 California Public Resources Code 25354,
12 subdivision (c) provides the CEC with the authority to
13 collect monthly projections of the same information
14 detailed under subdivision(a). For refiners, this includes
15 volume, price, type, and source information for receipts,
16 inputs, exports, and inventories of crude oil, feedstocks,
17 petroleum products, blend stocks, and ethanol. This
18 information is currently collected for past months in the
19 CEC M810, California Refinery Monthly Report.

20 For major marketers, this includes volume, price,
21 type, and source information for receipts, inventories, and
22 distributions of finished petroleum products, blend stocks,
23 and ethanol. This information is currently collected for
24 past months in the M700, California Imports, Exports, and
25 Intrastate Movements Monthly Report.

1 Under California Code of Regulations, Title 20,
2 Section 1366, which is the Requirement to File section, we
3 have drafted the following language to implement provisions
4 of Public Resources Code 25354 to require the filing of the
5 three-month projections for refiners and major petroleum
6 product marketers.

7 In short, the proposed language states that
8 refiners and major marketers shall submit monthly reports
9 containing projections of the specified information for
10 each of the following three months. The specific
11 information to report is included on the next two slides.

12 For refiners, we have proposed adding Appendix B,
13 Section 9, detailing the information required to file in
14 the monthly projections. This includes, for each of the
15 following three months, projected stocks of crude oil,
16 gasoline, aviation fuels, distillate, and residual fuel oil
17 at the beginning of each month, projected receipts of
18 foreign and domestic crude oil, and the previously listed
19 products, projected refinery inputs, meaning the amount of
20 each product used by the refinery, projected refinery
21 production of gasoline, aviation fuels, distillates, and
22 residual fuel oil, projected shipments or outflows of each
23 product, and the projected stocks of products at the end of
24 each month.

25 For major petroleum product marketers, we have

1 proposed adding Appendix B, Section 10, detailing the
2 information required to file in the monthly projections.
3 This includes, for each of the following three months,
4 projected stocks of gasoline, aviation fuels, distillate,
5 and residual fuel oil at the beginning of each month,
6 projected acquisitions of each product from California
7 refineries, other California sources, and other domestic or
8 foreign sources, projected distributions of each product to
9 California purchasers, non-California purchasers, and for
10 the reporting entity's own consumption.

11 Next, I'd like to walk through the proposed forms
12 for the M05 Refinery Projection Report and the M07 Marketer
13 Projected Acquisitions and Distributions Report. Both forms
14 are intended to be submitted monthly, as noted by the M at
15 the beginning of the form name.

16 These draft forms, along with the draft
17 regulations, are available for further review on docket 23-
18 OAR-03.

19 I'll now switch to the first form. This is our
20 M05 Refinery Projections Report.

21 The first tab you can see is the company
22 information. Similar to a lot of our other data collection
23 forms, this is where the submitter would fill in their
24 information, including the period for which they're
25 submitting the report, their company name, ID, address,

1 email, and phone number, as well as the contact name, phone
2 number, email for the person that's submitting the report,
3 and the date that the report is being filed.

4 On the next tab, which is the refinery
5 projection, you can see we have several columns here,
6 starting with column A, which is the product name. These
7 are pre-filled, so this is just a list of all of the
8 applicable products. The product code is already filled in
9 as well, so this is just the appropriate product code for
10 each of these products.

11 And then next, which is intended to be filled in,
12 and I just filled this in for demonstration purposes, but
13 you would fill in the year and the month for whichever
14 month is being projected. So for all of these different
15 products, you would just list that same month over and over
16 again for each product.

17 Then you have each of the following five columns
18 to fill in the appropriate information, the volumes for
19 each product, so the projected receipts for that month, the
20 projected refinery inputs, the projected production, the
21 projected shipments or outflows from the refinery, and
22 finally the projected closing inventories.

23 If you scroll down, you can see this list repeats
24 again for the second month to be included in the projection
25 report. Again, this is filled in for demonstration

1 purposes, but it should be filled in as whatever the second
2 month is in the projection. And again, the same information
3 for that month. And then finally, sectioned off at the
4 bottom would be the third month that the estimates are
5 included for.

6 Okay, let's now look at the M07. This is the
7 Major Marketer Projected Acquisitions and Distributions
8 Report.

9 Once again, we have a company information tab
10 with the same information that I just talked about, the
11 reporting period for which the report is being submitted,
12 company information, contact name and information for the
13 person submitting the report, and the date that the report
14 is filed.

15 We have two tabs. The first is the acquisitions.
16 This, again, you can see several columns here starting with
17 product type. This is now a drop-down knowing that the
18 number of products that are to be included in each report
19 may differ month to month. So rather than spelling them all
20 out, what we've done is just given the option to include
21 whichever product types will be expected to be acquired
22 that month.

23 So you can choose from this drop-down menu. Let's
24 say you pick gasoline. If you know the product name, which
25 may be known if it's projected for, say, the next month,

1 but when you're projecting for information, say, you know,
2 two or three months in advance, the product name more
3 specifically may not be known. So fill this in if it is
4 known at the time. Let's say for gasoline, we wanted to say
5 CARBOB, so you can choose that from the drop-down. The
6 product code will fill in. If a product name is selected,
7 it will automatically fill in.

8 And then similar to the other report, we fill in
9 the year and the month, so let's say this is for 2025 and
10 month one. The formatting looks like it should be a little
11 different. It should just be the year and then the month
12 number, so say 2025 and then 01.

13 The mode of transportation. So let's say this is
14 a marine vessel. The source. Did it come from a foreign or
15 domestic import, say foreign imports? The source, the
16 region location where it's coming from. The receiving
17 location, if it's known, if that's going to Northern or
18 Southern California. If it's known at the time, the port or
19 load location, and the total volume in thousands of
20 barrels.

21 Once all of the product types are listed for that
22 month, then you can just continue on further down the list
23 and repeat for the second and third months. This is very
24 similar to, like I said before, the M700 for past
25 information, just intended to be projections for future

1 months. So this report could be 10 rows long one month, or
2 it could be 50 rows long another month, just depending on
3 the activity in the upcoming three months.

4 Distribution tab is very similar to the
5 acquisitions. Once again, we have, in column A, we have the
6 product type, which is a drop-down. So similar to the last
7 time, you can just choose the product type, and if it's
8 known, the product name more specifically. If the product
9 name is known, the product code will automatically fill in.
10 And then you'll fill in the year and month for the
11 projection.

12 The mode of transportation, again, if it's
13 pipeline, marine vessel, or rail. This is, again, for
14 distribution, so this is sales mode of transportation. The
15 purchaser, if it's a California purchaser, non-California,
16 foreign, or domestic, or it's for your own company's own
17 consumption. The destination. The region, if known, either
18 northern or southern California. The port or distribution
19 location, if it's known, for California purchases only. And
20 finally, the volume in thousands of barrels.

21 Those are both the M05 and M07 proposed forms to
22 collect the three-month refinery and major marketer
23 projections.

24 Now I will present the draft revisions to the
25 Refinery Maintenance Guidebook and associated data

1 collection forms.

2 The draft language for the refinery maintenance
3 reporting requirements is captured in the California
4 Refinery Maintenance Reporting Guidebook. I won't go
5 through the entire guidebook itself, but will highlight
6 some of the proposed changes here.

7 The substantive changes are contained in Chapter
8 3, Maintenance Reports. In this chapter, we have proposed
9 adding to the informational requirements a process unit ID
10 for each processing unit involved in a planned or unplanned
11 maintenance event.

12 Next, for in-state purchases, out-of-state
13 purchases, and foreign imports, we are proposing to change
14 the reporting units from barrels per day to barrels.

15 Finally, we have proposed language that the
16 values for each of these three categories are intended to
17 be the expected purchase amount, knowing the exact volume
18 may not be known at the time of the report.

19 Next, I'd like to walk through the proposed forms
20 for the EBR-1P, which is the planned maintenance report,
21 and EBR-1U, unplanned maintenance report. Both forms are
22 intended to be submitted based on a qualifying event
23 occurring, noted by the EBR at the beginning of the form
24 name, which stands for Event-Based Report.

25 These draft forms, along with the draft Refinery

1 Maintenance Guidebook, are available for further review on
2 Docket 23-OIR-03.

3 Great, so now let's now look at both of the
4 refinery maintenance reports. Again, these are drafts.

5 The first is the EBR-1P, the California Refinery
6 Planned Refinery Maintenance and Turnaround Report. This
7 report is to be submitted at least 120 days before the
8 planned maintenance or turnaround.

9 At the top, you can see the company information
10 section, which, similar to the other forms, includes things
11 like the report period for which the month, day, and year
12 that the report is being submitted, company information
13 including name, ID number, the refinery name, the refinery
14 ID number, address, email, and phone number, as well as
15 contact name, email, phone number for the person submitting
16 the report, the date filed, the date of the previous
17 submission, if applicable, so if this is a revision to a
18 Planned Maintenance Report, the ID from the previous
19 submission should be included here -- or the date, sorry,
20 of the previous submission. This is a planned event, so
21 that's just static. The type of submission, whether this is
22 initial, a revision, or final version, and then if it is a
23 revision or a final, to include the initial submission ID.

24 You can see we've also added in several of these
25 little pop-ups that will help explain, provide notes for

1 what information should be filled in.

2 Scrolling down, you can see that there's this one
3 last column that says, if this is a revised report, to
4 please specify the reason for the revision.

5 Underneath that, in the section called event
6 description, we have a field for a brief description of the
7 planned work. No changes here. This is in the current
8 version of the form.

9 Scrolling down, we have a process units section,
10 which includes several fields for the impacted units in
11 this planned maintenance, including the name, the newly
12 suggested process unit ID, halt service date, the return to
13 service date, operational capacity in barrels per calendar
14 day, the daily decrease in output of gasoline, diesel, jet
15 fuel, and other products in barrels per day, a field to
16 capture whether or not this is a revision, a yes or no for
17 that individual row, and then whether it's final, yes or
18 no. So once the plan maintenance event final report is
19 submitted, this last column would be marked yes.

20 Once again, one of the things we're doing to try
21 and make this easier is including instructions. A lot of
22 the notes that help support if you click on different cells
23 of what information needs to go there, you know, will pop
24 up, but a lot of that detail is also here. So if there are
25 any questions on what information needs to be provided,

1 we've included instructions in the form.

2 I'll now move to the EBR-1U. This is the
3 California Refinery Unplanned Maintenance and Turnaround
4 Report. This form is to be submitted within two business
5 days of the initial outage or rate reduction, and then a
6 final report within two business days of the completion of
7 repairs or when process units return to planned production
8 rates.

9 This is going to be very similar to the planned
10 report, with some slight changes or just slight
11 differences. We have the same company information section
12 with the same information about the company and the contact
13 name and information for the person submitting the report,
14 the date the file is reported, the previous submission
15 date, if applicable, if this is a revision or final report,
16 the type of submission, initial, revision, or final, and
17 then again, if it is a revision or final version, the
18 submission ID for the initial report.

19 Below that, we have, if this is a revised report,
20 to specify the reason for the revision.

21 Going down, we have a description of the event.
22 The reason for unplanned maintenance is just a free form.
23 No changes there.

24 Then we get into the process unit section, so a
25 list of the different process units that are impacted by

1 this unplanned event, listed individually, starting with
2 the name of the process unit, the process unit ID, halt
3 service date, return to service date, operational capacity,
4 and barrels per calendar day of the process unit, the daily
5 decrease in output of gasoline, diesel, jet fuel, and other
6 products. And again, as I mentioned before, these are
7 expected values until the final report is submitted. And
8 then whether this is a revised or final report.

9 I realize I skipped a section down at the bottom
10 on the first one, so I'll go back to that one in just a
11 second. I didn't scroll down far enough. There's a long
12 list here depending on how many process units are impacted.

13 So down at the bottom, we have the inventory and
14 supply adjustment section. Please keep in mind I'm talking
15 about the unplanned report now, and I will switch back to
16 the planned in just a second.

17 So in the inventory and supply adjustment
18 section, we have five different inventory types, so that's
19 California gasoline, non-California gasoline, gasoline
20 blending components, diesel fuels, and aviation fuels, and
21 for each of those five products, the current inventory at
22 the refinery at the time of the notice, the current
23 inventory at other storage locations -- oops, the expected
24 inventory drawdown at the refinery related to the event in
25 barrels, inventory drawdown at other storage locations, in-

1 state purchases from other market participants, out-of-
2 state purchases from other market participants, and foreign
3 imports.

4 Again, one of the recommendations or proposed
5 changes to the Refinery Maintenance Guidebook is for these
6 to be explicitly expected values until the final report is
7 submitted.

8 You have reductions of non-contracted sales
9 related to the event, and the quantity of contractual
10 supply obligations related to the event for California
11 gasoline.

12 At the end, we have, with the submission of the
13 report, whether or not this information has been revised,
14 and whether or not it's the final number.

15 All right, so let me switch back really quick to
16 the planned maintenance report, and I'll go down to the
17 bottom for that same section, again, the inventory and
18 supply adjustment section. We're on the planned maintenance
19 report right now, the EBR-1P.

20 Very similar to the unplanned report, we have the
21 same five inventory types, these products listed, and for
22 each of them, listing the inventory at the refinery, the
23 inventory at other storage locations, the expected
24 inventory drawdown related to the event at the refinery,
25 the inventory drawdown at other storage locations, in-state

1 and out-of-state purchases from other market participants,
2 again, if this is an initial or revised report, what the
3 expected volumes are, foreign imports related to the event,
4 reductions of non-contracted sales, the quantity of --
5 sorry, it just keeps scrolling over on me -- quantity of
6 contractual supply obligations for California gasoline, and
7 then finally, if this is a revised or final report, to mark
8 yes or no.

9 So those are the four proposed forms right now
10 with this rulemaking. Once again, all forms, the draft
11 regulations, and the draft guidebook are available on
12 docket 23-OIR-03 for further review.

13 All right, so here are the next steps in our
14 emergency rulemaking process.

15 Today, November 12th, we're hosting this workshop
16 to receive feedback on our proposed regulations, guidebook,
17 and associated data collection forms.

18 Our goal is to complete stakeholder outreach and
19 finalize the proposed rules before the end of the year.

20 The rules will be presented for adoption at a CEC
21 business meeting in Q1 2025. The refinery maintenance rules
22 are APA-exempt and are effective immediately upon approval
23 at a business meeting, whereas the three-month projection
24 regulations will be submitted to the Office of
25 Administrative Law for approval. These regulations are part

1 of the SB X1-2 emergency rulemaking, so the timeline and
2 protocols are different than a standard rulemaking.

3 If the three-month projections regulatory package
4 is adopted at a CEC business meeting, it will be submitted
5 to the Office of Administrative Law the following day. OAL
6 has ten days to review the package and make a decision, and
7 will accept comments for the first five days of the ten-day
8 review period.

9 Feedback is welcome and appreciated as we refine
10 the draft language, forms, and instructions. Some areas
11 that could benefit from input include regulatory language,
12 forms, or instructions that might be unclear and would
13 benefit from further clarification, information on relevant
14 industry standards that should be considered, including IT
15 processes to compile the information and complete the
16 forms, and any suggestions for simplification.

17 If you have feedback, you can submit written
18 comments to Docket 23-OIR-03 before 5:00 p.m. on December
19 9, 2024. You can also reach out and request a meeting to
20 discuss further.

21 We'll now open it up for public comment.

22 MS. BERLINER: Good morning, everyone. Now we'll
23 move on to our public comment period. One person per
24 organization may comment, and comments are limited to three
25 minutes per speaker.

1 For the Zoom platform, use the raise-hand feature
2 to let us know you'd like to comment. We will call on you
3 and open your lines and make comments. For those on the
4 phone, dial star nine to raise your hand and star six to
5 mute or unmute your line. We will unmute your line from our
6 end.

7 Is there anyone on the Zoom platform wishing to
8 comment? Please raise your hand now.

9 Jeremy, I'm seeing no raised hands.

10 MR. SMITH: We'll give it just a second to make
11 sure we have no public comments, no raised hands, no one on
12 the phone. Dial star nine to raise your hand if you do have
13 a comment and you're on the phone.

14 MS. BERLINER: While we are waiting for people to
15 raise their hands, if anyone chooses to raise their hands,
16 I'd like to remind everyone that we welcome written
17 comments, and once again, those comments are due by the
18 close of day on December 9th at 5:00 p.m. Instructions on
19 how to provide written comments are included in the notice
20 for this workshop, which is posted on the CEC's website.

21 MR. SMITH: Still no raised hands?

22 MS. BERLINER: Correct.

23 MR. SMITH: All right. Well, we can go to the last
24 slide. I'll turn my camera back on to close this out.

25 All right, that concludes our presentation today.

1 Just want to thank you all for attending. For those that,
2 like Aria said, are planning to submit written comments,
3 thank you for participating in the rulemaking process.

4 If you have questions or would like to request a
5 meeting to discuss the draft rules in more detail, please
6 reach out to me or the PIIRA team. Our contact information
7 is on the screen.

8 There may be more upcoming workshops on topics
9 related to SB X1-2, so please watch for those notices in
10 the future.

11 Before we close, I'd like to thank the staff in
12 the Transportation Fuels Market Analysis Unit and the
13 Energy Assessments Division that met with industry prior to
14 this workshop and carefully developed these draft rules and
15 forms for input. Thank you also to the Chief Counsel's
16 Office for their continued support.

17 With that, this workshop is adjourned.

18 (The workshop adjourned at 10:38 a.m.)

CERTIFICATE OF REPORTER

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were reported by me, a certified electronic court reporter and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 19th day of November, 2024.



MARTHA L. NELSON, CERT**367

CERTIFICATE OF TRANSCRIBER

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were transcribed by me, a certified transcriber and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

I certify that the foregoing is a correct transcript, to the best of my ability, from the electronic sound recording of the proceedings in the above-entitled matter.



November 19, 2024

MARTHA L. NELSON, CERT**367