1 STATE OF NEW YORK
PUBLIC SERVICE COMMISSION
2 _____

3 Regular Meeting of the Public Service Commission

4 _____

5

6 THURSDAY, JANUARY 17, 2013
10:30 a.m.
7

8 Agency Building 3
19th Floor
9 Albany, New York

10

11

12

13 COMMISSIONERS:

14 GARRY A. BROWN, Chairman
PATRICIA L. ACAMPORA
15 MAUREEN F. HARRIS
JAMES J. LAROCCA (in New York City)
16 GREGG C. SAYRE

17

18

19

20

21

22

23

24

1 D I S C L A I M E R

2 This is an unofficial transcript of a public meeting
3 of the New York State Public Service Commission held on
4 January 17, 2013 in the Commission's Offices at Three
5 Empire State Plaza, 19th Floor Board Room, Albany, New
6 York.

7 This transcript may contain inaccuracies, and it may
8 not include all discussion conducted at the meeting.

9 The transcript is intended solely for general
10 information purposes and is not part of any formal or
11 informal record of a Commission decision of any matter
12 discussed. Expressions of opinions in this transcript
13 do not necessarily reflect final determination of
14 beliefs which are set forth in the Commission's
15 Decisions and Order.

16 No pleading or paper may be filed with the Commission
17 in any proceeding as a result of or addressed to any
18 statement or argument contained in this transcript,
19 except as the Commission may authorize.

20

21

22

23

24

1 CHAIRMAN BROWN: I would like to call the
2 January 17, 2013 session of the New York State Public
3 Service Commission to order.
4 Obviously Commissioner Larocca is joining us
5 from the New York City office.
6 Madam Assistant Secretary, are there any
7 changes to the agenda this morning?
8 ASSISTANT SECRETARY LYNCH: There is one
9 change today. Item 464, case 12-W-0051, petition for
10 approval pursuant to Public Service Law Section 113(2)
11 of a proposed allocation of certain tax refunds between
12 Long Island Water Corporation d/b/a Long Island American
13 Water and ratepayers is over.
14 CHAIRMAN BROWN: Thank you, Madam Assistant
15 Secretary.
16 So, let's move to the consent agenda. Any
17 of the commissioners wish to recuse or abstain from
18 voting on any of the consent agenda items?
19 COMMISSIONER HARRIS: I do, Mr. Chairman.
20 I would like to abstain from voting on item
21 267. Thank you.
22 CHAIRMAN BROWN: Thank you.
23 So, all those in favor of the
24 recommendations on the agenda please say "aye".

1 COMMISSIONER LAROCCA: Mr. Chairman, if I
2 might.
3 In the consent item, all of those cable
4 items at the back of the agenda in the 600 series, I
5 would like to just get up on the record a quick
6 description of what our role is in those cases.
7 In the workup to this session, our role as
8 commissioners was described to me as one of a
9 ministerial act. Upon examination, I find that we may
10 be making some judgment.
11 I just wanted to get on the record as we
12 take that batch -- and I notice one of them -- I will
13 leave that alone. But just to have on the record what
14 it is specifically that we are acting upon, what
15 judgment we are making when we approve those franchise
16 renewals, which I think is what most of them are.
17 CHAIRMAN BROWN: Chad?
18 MR. HUME: The role that the commission has
19 is to review franchises that are approved at the local
20 government level to assure that they comply with our
21 rules and our minimum standards that are established for
22 cable television franchises in the state.
23 So, the commission is essentially confirming
24 that those franchises, as negotiated at the local level,

1 do comport and conform with our rules.
2 CHAIRMAN BROWN: So each one of these has
3 been approved by the local municipality.
4 MR. HUME: Right.
5 CHAIRMAN BROWN: It's then sent to us and we
6 review them to make sure that the contracts they have
7 signed, or the franchises, they have agreed to abide by
8 our rules.
9 Is that kind of --
10 MR. HUME: Correct.
11 CHAIRMAN BROWN: -- what you are saying?
12 Is there anything else, Commissioner
13 Larocca, on that?
14 COMMISSIONER LAROCCA: Do we make any
15 judgment about the availability of competition, about
16 the quality of the service, or do we simply confirm that
17 the franchise authority has exercised its end of the
18 process?
19 MR. HUME: Yes. To begin with, underneath
20 state law all those franchises are non-exclusive. There
21 is nothing preventing a local community, as upwards of
22 200 communities here in New York have done, in granting
23 a second franchise to a competitive provider.
24 So, in that context, we don't make a

1 judgment as to whether or not competition is currently
2 available, but those franchises are required to be
3 non-exclusive.
4 COMMISSIONER LAROCCA: Mr. Chairman, I would
5 just make the observation that when we put our
6 imprimatur on the action of the local franchisee it's a
7 very limited review and confirmation, and would seem if
8 it doesn't examine such things as the availability of
9 competition, service quality and so forth, that we are
10 not performing a very meaningful service or meaningful
11 role for the customers in that territory.
12 I don't have a remedy for that but, as these
13 roll through, most times we routinely confirm sort of a
14 minimal procedural review, and I just wonder over time
15 if that's enough.
16 So I raise it here, but I am not offering
17 any remedy to the thought, but it's something I think we
18 should be thinking about.
19 CHAIRMAN BROWN: I'll ask our folks to kind
20 of -- this was a little bit off the cuff -- to more
21 thoroughly kind of describe the process to all of us so
22 that we understand completely what it is we do and what
23 it is we do not do, which is a fair question.
24 COMMISSIONER LAROCCA: Thank you.

1 CHAIRMAN BROWN: So, we still haven't voted
2 yet.
3 So, all those in favor of the
4 recommendations on the consent agenda with the
5 abstention noted please say "aye".
6 (Response of "aye".)
7 Opposed?
8 (No response.)
9 Hearing none, the recommendations are
10 adopted.
11 Let's move to the regular agenda. The first
12 item for discussion item 201, case 10-M-0451, proceeding
13 on the motion of the commission to investigate National
14 Grid affiliate cost allocations, policies and
15 procedures. This will be presented today by Joe
16 Lochner, Chief of the Office of Accounting and Finance.
17 Good morning, Joe.
18 MR. LOCHNER: Good morning, commissioners.
19 I thought I would run through these slides
20 -- there's ten of them, I'll try to do it as quickly as
21 possible -- to give you a background of how this all
22 transpired and what the recommendations are in the draft
23 order that's before you.
24 Turning to the background slide, slide 2.

1 The indicators are the problem that caused this
2 proceeding to commence. Back in December of 2009 in a
3 management audit of Niagara Mohawk's electric
4 operations, Northstar Consulting, in its report, found
5 that there was ineffective management control of the
6 service company charges for shared services that Niagara
7 Mohawk electric received from its affiliates.
8 The management auditor recommended that
9 there be an establishing of service level agreements
10 that would more carefully define the services, the
11 quantity of them, and their relative cost so the company
12 can manage that.
13 Shortly after that the company filed --
14 Niagara Mohawk filed an electric rate case in 2010 and
15 the staff examined the service company charges. As part
16 of their testimony of the service company charges, they
17 found -- explained significant increases in service
18 company charges, particularly increases in NIMO electric
19 charges compared to other affiliate allocations.
20 The staff came to an adjustment of $26
21 million macro adjustment for misallocation, and the
22 company basically, in its position throughout the
23 proceeding, removed $6 million of charges primarily to
24 expatriate expenses and service company executive costs.

1 Also, at the same time, during this 2010, in
2 the Boston gas rate filing in Massachusetts, the
3 Massachusetts Attorney General uncovered questionable
4 transactions, service company transactions, related to
5 employee expenses for expatriate employees, political
6 lobbying and other such costs charged above the line.
7 So, that is what basically kicked off the
8 investigation. As a result of this, in November of 2010
9 -- going to slide 3 -- an investigation was initiated.
10 In November 2010, the commission established
11 a proceeding, this proceeding, to investigate National
12 Grid affiliate allocations to determine if the rate
13 adjustments were needed for New York utilities.
14 This includes Niagara Mohawk Electric and
15 Gas, KeySpan Energy Delivery New York, and KeySpan
16 Energy Delivery Long Island and their rates.
17 The proceeding started in November and there
18 was -- an RFP was issued, request for proposal, and
19 there were five different consulting proposals presented
20 for evaluation.
21 In the intervening period, the commission
22 decided and the electric rate case had started for NIMO
23 in 2010 -- in May -- in January, though, of 2011 the
24 rates in the litigated rate case, one year rate case for

1 NIMO electric.
2 In that decision issued in January 24, 2011,
3 the Commission established $50 million in temporary
4 rates for NIMO electric to be related to what was
5 discovered in this investigation to protect customers
6 from the potential of overcharges to NIMO electric
7 customers.
8 In March -- then in March of 2011, Overland
9 Consulting was selected and the investigation proceeding
10 was initiated and began its audit.
11 Turning now to slide 4. The RFP expected
12 the report to be issued by November of 2011; however, it
13 took approximately an additional year to complete the
14 audit. This was basically caused by the unexpected
15 complexity and size of the National Grid accounting
16 allocation system, and also a lack of timely response in
17 the beginning of the proceeding by the company that was
18 rectified as time went on.
19 National Grid -- Overland's report was
20 issued on October 23rd to Overland -- to National Grid
21 to be able to make comments. It presents ten
22 recommendations to improve service company accounting
23 systems, controls, and allocation methods for the New
24 York utilities.

1 Some of these are, for example, to go to a
2 single allocation methodology. Another is to make the
3 allocation of individual transactions more transparent
4 and traceable in the allocation and accounting system.
5 And also, finally, that New York utilities should
6 actually audit and verify the individual charges and
7 their monthly bills.
8 By the way, many of these recommendations
9 were also made by Liberty Consulting in its audit that
10 it performed of National Grid's service companies that
11 National Grid procured itself previously.
12 Also, Overland found, doing its audit, that
13 the NIMO electric rates in 2011 that were set included
14 -- appeared to include 11.2 million of historic
15 non-recurring service company charges that should not be
16 built into continuing rates.
17 Going on to slide 5, Overland report
18 transaction testing. This was the major area of
19 examination in the investigation. Overland tested
20 transactions of the service company during the 20-month
21 period for our New York utilities that they received
22 allocations.
23 They looked at 1425 service company
24 transactions worth about $1.8 billion out of a

1 population of basically $5 billion of service company
2 transactions which encompass 300 -- the 536,000
3 transactions.
4 Overland basically tested all transactions
5 that were valued greater than a million dollars, and
6 made a sample of transactions below that.
7 Based on the results of its testing and
8 extrapolation, they determined that, of all those
9 transactions they examined, 176 of them had errors in
10 their accounting or allocation. There were three types
11 of errors. 110 were cost direction errors, where the
12 amount was allocated to the wrong affiliate. The
13 affiliated benefitting wasn't the affiliates that the
14 cost was allocated to.
15 They also found five FERC accounting
16 transactions, where the cost was not utility-related
17 operating activity. For example, this could be
18 charitable contributions or political lobbying, or other
19 costs of that nature, that should be charged below the
20 line and not allocated to the utilities above the line
21 and be put in rates.
22 And finally, there were 61 unsupported
23 transactions. Now, these are transactions where there
24 was -- the order found insufficient documentation to

1 support the accounting or its proper allocation to the
2 various affiliates in the system.
3 It's important to point out, though, I think
4 that we -- that Overland in this report made it very
5 clear that they found no systematic bias in the
6 accounting allocation of these costs to purposely shift
7 these costs to any affiliate to -- in any unfair or
8 benevolent way. It doesn't appear that they were
9 purposeful, that these errors were purposely done.
10 Turning to the next slide, slide 6. Based
11 on the extrapolation of these transaction testings that
12 were performed, Overland determined that the New York
13 utilities were overcharged in their test years by $44
14 million. That's an estimate.
15 This combined $44 million estimate affected
16 -- it shows that material amounts, and three out of the
17 four of those utilities had statistically significant
18 estimates, meaning they were within the bounds of the
19 confidence limits, where they used a 95 percent
20 confidence level.
21 The only one that wasn't was Niagara Mohawk
22 electric. Also, if you will note, they had less than
23 one percent of estimated overcharges as a comparison of
24 the annual bill. All the others had much higher levels

1 of overcharges of percentage of the overall bill for the
2 year, as high as nine percent.
3 Turning to the next slide, slide 7.
4 National Grid, as I said before, received the report and
5 filed comments related to the report on November 9,
6 2012.
7 National Grid stated they will implement or
8 consider implementing all ten of the recommendations.
9 Notice, of course, that many of these recommendations
10 they had previously received from their own auditor,
11 Liberty Consulting, in changing the accounting
12 allocation system for the service companies.
13 National Grid pointed out that it's already
14 begun implementation of five of the Overland
15 recommendations. This involved going to a --
16 consolidating service companies -- going to a single
17 accounting system and a single allocation system among
18 others. That occurred in November of this year, of this
19 last year, 2012.
20 However, Niagara Mohawk disagreed that the
21 NIMO electric rates that were set in the last rate case,
22 as current rates included the $11 million of
23 non-recurring service company charges. They believed
24 that that was dealt -- considered and dealt properly

1 within the rate case and the commission decision.
2 Let's go to the next slide, slide 8. In its
3 comments related to the transaction testing, National
4 Grid disagreed with 37 transaction errors out of the 176
5 that affected the cost of service periods for each of
6 the utilities.
7 It's important to note that 36 of the
8 transactions they disagreed were unsupported
9 transactions. Only one was a cost direction error,
10 which appears to have very little effect.
11 For the -- related to the unsupported
12 transactions, the company -- they believe -- National
13 Grid/Overland did not consider the fact that there was
14 sufficient documentation -- there's sufficient
15 documentation that proved that there was a legitimate
16 utility purpose for the expenditure that would
17 demonstrate that the utilities benefitted and there
18 should be costs charged above the line.
19 They were concerned that Overland was
20 throwing out or was disallowing the allocation of
21 transactions simply because there wasn't always a
22 documented support for the basis of its allocation.
23 They believed many of these transactions
24 still should be allocated in some manner to the

1 utilities and reflected above the line for rate
2 purposes.
3 The other major area of disagreement that
4 National Grid presented in its comments related to
5 Overland's statistical analysis and how it extrapolated
6 the sample results to the population of charges to come
7 up with their estimate of $44 million.
8 They believe that the level of sampling was
9 insufficient, and that the sample results should not be
10 extrapolated. They basically found that for the
11 individual subpopulations, seven of the 12 company
12 specific expense category subpopulations, the amounts
13 were not statistically significant.
14 In other words, the overcharge estimate, the
15 band of it broke, the zero dollars. And so, that was a
16 concern they had. And finally -- and also that the
17 population estimate, the estimate that was for the
18 overcharge was overstated, but that was because the
19 populations that they extrapolated from were larger than
20 the subpopulations that the samples were drawn from.
21 And finally, also, both, too, is that the
22 confidence intervals, the bands around these estimates
23 of overcharges were very significant. In fact, for the
24 overall $44 million, the band is 60 percent on each

1 side. So, they believe it's a very -- it was an
2 imprecise estimate.
3 National Grid in its comments summarized by
4 saying that correcting for the unsupported transactions
5 and removing the extrapolation, the New York utilities,
6 during these periods, were overcharged by only $175,000.
7 Turning to the next slide. Final slide,
8 slide 10. As you can see, there's significant
9 disagreement between the auditor and the utility with
10 regard to the estimate of overcharges.
11 So, that's what we have to deal with going
12 forward in this proceeding. The recommendation, as you
13 will see in the draft order we presented to you, first,
14 we order National Grid to file an implementation plan
15 for the ten Overland audit report recommendations to
16 improve the accounting allocation system and the
17 monitoring of these costs by our utilities.
18 We also, however, are establishing a new
19 proceeding to examine if the rate adjustments are needed
20 that Overland has estimated in its report.
21 We're going to -- so, all the parties,
22 including the company, have the opportunity to examine
23 the auditor's estimates and the back up to it and
24 present their side of the story, really.

1 And particularly we find this necessary for
2 the estimate of overcharges for NIMO electric, KEDNY and
3 KEDLI. It's KeySpan Energy Delivery New York and
4 KeySpan Energy Delivery Long Island.
5 The fact is is that the overcharges that
6 were estimated for NIMO gas, although we found
7 significant, were not sufficient to break the earnings
8 sharing measurement in the years that these charges were
9 made because the company was deficient in its earnings.
10 We also were going to allow the company and
11 parties to examine Overland's estimate determination
12 that there was $11 million of non-recurring charges set
13 in the current electric rates for NIMO to see if there's
14 an adjustment necessary for that.
15 That is basically where we got to. Do you
16 have any questions?
17 CHAIRMAN BROWN: Questions or comments?
18 Commissioner Sayre.
19 COMMISSIONER SAYRE: I support the staff's
20 recommendation, and I look forward to the donnybrook
21 over the ratemaking adjustment, and I think it's a good
22 thing to let everybody have their say and make a
23 decision on the ratemaking treatment.
24 I have a legal question for Peter McGowan.

1 With respect to the ten recommendations where we are
2 directing the company to file an implementation plan, I
3 want to make sure that it's clear that we have the legal
4 jurisdiction to change the plan that they file and
5 direct that they do something other than what they file
6 if we are dissatisfied with it after the notice and
7 comment review.
8 MR. MCGOWAN: Yes. The commission does have
9 the power to insist that the recommendations, if they
10 are the appropriate thing to implement and the company
11 doesn't implement them to the commission's satisfaction,
12 that the commission could order a different outcome than
13 the company's implementation plan.
14 So, when we go through the notice and
15 comment process on the company's implementation plan, it
16 will have as its root the recommendations from the
17 Overland recommendation -- from the Overland report.
18 COMMISSIONER SAYRE: Thank you.
19 CHAIRMAN BROWN: Commissioner Harris.
20 COMMISSIONER HARRIS: Joe, if you would, at
21 our briefings we had the benefit of discussion with you
22 all with respect to the need for a new proceeding.
23 The purpose of the November 10th Overland
24 audit was to investigate if rate adjustments were

1 needed, but seems that we're going forward now
2 investigating whether rate adjustments are needed with a
3 new proceeding.
4 Can you just explain why a new proceeding is
5 needed and we are not dealing with those rate
6 adjustments here with those findings.
7 MR. LOCHNER: I think probably -- I think
8 this is also a legal issue, but there has been
9 significant disagreement between the company and the
10 auditor, and it appears that there is arguments of fact
11 involved here, disagreements on fact.
12 And so to a great extent I think there needs
13 to be a proceeding that there is a fair airing of this,
14 and also for other parties to also be able to enter into
15 discussion and comment on this.
16 So, I think that's possibly the reason.
17 Before we make any monetary decision here -- the
18 Commission does -- they should give all parties,
19 especially the company, the ability to make its case in
20 a record.
21 COMMISSIONER HARRIS: And also to allow
22 other parties an opportunity to weigh in, which they
23 would not have had if we made a determination today on
24 these findings.

1 MR. LOCHNER: Yes.
2 MR. BOUTEILLER: If I may interject,
3 Overland is an auditor, and their auditing was to inform
4 the ratemaking here. The primary rate makers I think
5 that you're going to be relying upon are the staff
6 entities that were in our rate cases previously.
7 They are familiar with the ratemaking
8 history in each of these contexts. Overland did not
9 have that experience or that specialty.
10 So, I think what you need is the benefit of
11 our own trial staff members who will be examining these
12 items very carefully with the knowledge of the treatment
13 that was had in the rate cases.
14 Had the company agreed with Overland, then
15 that could have settled everything out now. Given their
16 disagreement, I think we need to activate the trial
17 staff, who will bring and inform the process with their
18 knowledge of the accounts, of the systems, of the
19 intents and purposes that were intended to be
20 accomplished in each of the ratemaking contexts that you
21 had before you.
22 COMMISSIONER HARRIS: If I could, I have one
23 other question or comment really for the new proceeding.
24 It seems as though there's some very strong disagreement

1 on the statistical analysis that Overland used with
2 respect to the extrapolation and the sampling groups.
3 Is this an industry standard when audits are
4 conducted, to extrapolate the way that Overland did in
5 this particular case? And if you don't know now I just
6 want that -- I need to have a better understanding,
7 because it seems as though that is the real point of
8 contention here.
9 MR. SCHULER: Commissioner Harris, I think
10 National Grid in its comments indicated a government
11 standard for precision levels. We don't have a tax
12 audit here similar to the sources that the company
13 cited.
14 We have done things with different precision
15 levels in the past, but I guess in spite of the
16 company's comments we think there is enough validity to
17 the statistical methods in the audit to continue on with
18 a further proceeding.
19 COMMISSIONER HARRIS: That's great. I am
20 looking for some additional information on private audit
21 companies and their review of service companies or
22 energy companies for this particular application here.
23 If we have any background information on
24 what the Liberty audit or an Overland audit would use as

1 their sort of industry standard for this.
2 MR. LOCHNER: Actually, in that respect,
3 generally, yes, statistical sampling is used in
4 performing audits. In fact, the auditing standards have
5 specific standards with regards to using statistical
6 auditing techniques.
7 Now, you don't have to use it in an audit.
8 You can use judgmental sampling. But statistical
9 sampling provides a rigor and discipline as to how you
10 approach and come to a decision in your sampling.
11 So, it is used and it's particularly used in
12 situations like this where you have a significantly
13 large population of items to sample, to examine the
14 population. Here, as I said, the period that we're
15 examining has 536,000 transactions. A single bill,
16 monthly bill, had approximately 30,000 transactions in
17 it.
18 And the amount that was being examined, you
19 know, $5 billion, it's a lot for us to be able to do and
20 do it in an economical and efficient fashion. So, using
21 statistics, inferential statistics allows us to do that
22 in this environment. It's used in other industries and
23 by the outside auditors.
24 MR. SCHULER: But it's our expectation that

1 information on sampling standards would come out in the
2 new proceeding.
3 COMMISSIONER HARRIS: That's what I am
4 looking for is to delve into that, to give some
5 confidence in that sampling that was used and that it is
6 used in elsewhere and the like.
7 Lastly, I would just ask the timing of this
8 new proceeding. I mean, I think we have all been
9 dealing with this particular -- these issues for a very
10 long, long time, and if we could have some timeframe as
11 to expect -- when we can expect this to come back before
12 us?
13 Anybody?
14 MR. MCGOWAN: Well, I don't know that we --
15 I certainly haven't mapped this thing out. What I would
16 hope is that we can focus this proceeding on the issues
17 that really need to be disputed out, and I would hope
18 that we would balance fairness with swiftness to get to
19 the final result for the benefit of ratepayers.
20 MR. BOUTEILLER: There will be an
21 opportunity here for as much litigation as is necessary;
22 however, all the shortcuts for litigation, including
23 issue settlement and issue resolution, remain available
24 to the parties, and that should be fully explored in the

1 beginning of the case.
2 Once that's had, then we will have a better
3 parameter of how long the case will be, how much of the
4 resources of the administrative law judges will be
5 necessary, what kinds of steps will be employed.
6 But initially there will be probably a
7 conference of the parties and they will see how close
8 they can come to issue resolution among themselves.
9 COMMISSIONER SAYRE: So, am I correct that
10 this is going to be an administrative law judge case,
11 not just a notice of comment case?
12 JUDGE LIEBSCHUTZ: That's correct.
13 And as Bill mentioned, I assume the ALJ will
14 meet with the parties and take into account their views
15 as to a litigation track and a negotiation track, and
16 whether those occur in tandem or sequentially is
17 something that the judge will work out with the parties.
18 But I think, with due regard to Commissioner
19 Harris' comments, that we understand the commission's
20 desire for a relatively swift resolution of something
21 that's already been ongoing for quite some time.
22 CHAIRMAN BROWN: Anything from New York
23 City?
24 COMMISSIONER LAROCCA: Do we have the

1 authority to act on what we have so far today? In other
2 words, do we have the authority to act on this matter
3 without initiating this new proceeding?
4 MR. MCGOWAN: I think it would be much
5 preferable to allow additional process since we're going
6 --
7 COMMISSIONER LAROCCA: That's not my
8 question. That's not my question. My question is do we
9 have the authority.
10 CHAIRMAN BROWN: The answer is yes, isn't
11 it, Peter? Could take action but we might not have a
12 proper record to support our action.
13 MR. MCGOWAN: The risk is that we are about
14 to embark on a rate -- potentially a rate reduction
15 exercise, and we need to make sure that we have a proper
16 rational basis. So, I wouldn't want to say that we
17 couldn't do it today, but there would be risks
18 associated with that.
19 MR. BOUTEILLER: Commissioner, you could act
20 today. However, I think around the table we would
21 advise not to just simply accept or endorse the Overland
22 results. You do not have the information that the
23 advisory staff would convey to you as to how comfortable
24 they are with any specific number offered here.

1 So, at a minimum, we would offer you another
2 memo if you were inclined to want to try to resolve this
3 case currently.
4 Alternatively, the recommendation is to let
5 a formal proceeding run through the criticism offered by
6 National Grid, and allow an administrative law judge to
7 provide you that guidance ultimately with another
8 memorandum or advice coming from the advisory staff.
9 COMMISSIONER LAROCCA: In the narrative
10 somebody described that it took one year to do the RFP
11 because the company was resistant and not cooperating.
12 Tell me more about that.
13 MR. LOCHNER: Well, it wasn't -- the RFP
14 didn't take that long. The audit took longer than
15 expected, but I -- and some of it had to do with the
16 fact that the company initially had to gear up to
17 provide responses to the backup to these 1425
18 transactions.
19 And that -- they were slow in the beginning
20 on that. However, we came to a discovery, three-party
21 discovery agreement, Overland, the company and staff, in
22 the end of 2011. And after that point in time things
23 speeded up and the company was right on target in
24 responding to the data requests.

1 Now, that was one element.
2 COMMISSIONER LAROCCA: As you described, it
3 took one year to get the RFP out.
4 MR. LOCHNER: No. It didn't take one year
5 to get the RFP out. Actually, the RFP went out in
6 November of 2010 and we selected the auditor in March of
7 2011.
8 The audit was supposed to be done -- we
9 expected to be reporting the audit to you at the end of
10 2011, and instead we are now reporting, really, at the
11 end of 2012. So, it took an additional year for the
12 actual audit to be performed.
13 That's what the issue was, and it really
14 related to two things. Like I said, initially providing
15 responses to questions took a little longer than it
16 should have.
17 And also, however, I think that the sheer
18 size and complexity of the accounting allocation system
19 -- it's important to realize they had two separate
20 accounting systems and two separate allocation
21 methodologies for many billions of dollars of
22 transactions.
23 So, it was quite an effort to get through
24 all that. So, that took a little extra time, too.

1 MR. BOUTEILLER: Commissioner, going into
2 this audit we knew that the records were in a state of
3 disrepair. That was indicated by previous audits of the
4 company's operations. So, we knew it was an arduous
5 event to go into here and we were anticipating that some
6 of these problems would occur and slow the thing down.
7 COMMISSIONER LAROCCA: Joe, I'm not
8 quarreling with you, but in the course of your narrative
9 you used the phrase one year delay in the RFP and I
10 apparently misunderstood that.
11 MR. LOCHNER: I am sorry.
12 COMMISSIONER LAROCCA: The overall concern I
13 have, which you have heard before in our informal run up
14 to this session, is that we are dealing with a matter
15 that came to notice in 2009.
16 Some of that notice came to us from others,
17 from Boston, from an Attorney General up there, from
18 some journalism, from some discovery in our own audit
19 processes and so forth.
20 So, as we approach the fifth anniversary of
21 this, we are initiating a proceeding that we are not
22 even hearing today what the timetable for that
23 proceeding will be, but rather a vigorous defense of why
24 we need an elaborate proceeding and the company needs

1 opportunities, which I honestly hear in the narrative,
2 that they have had all along the trail. We have been
3 arguing with this company about these matters for some
4 time.
5 I also am concerned to hear we're not --
6 sounds today that we are not embracing the quality of
7 the result we have from Overland. I thought we thought
8 enough of their work and their outcome to have
9 instructed us that there was a serious problem and we
10 need to remedy it.
11 It sounds softer to me today, and that
12 everything is now going into a proceeding of uncertain
13 duration. And I find it, frankly, puzzling, a little
14 embarrassing, disappointing, that a matter where we
15 pretty much know what we think about it -- there is
16 always room for dispute, but if there is a dispute at
17 this point between a couple hundred thousand and
18 multi-millions of dollars, this proceeding you are about
19 to launch could go on for a very long time.
20 So, I would prefer today that we move toward
21 a remedy even if it wouldn't be as neat in terms of
22 process perhaps as we would like it to be.
23 I will not oppose the order we are going to
24 issue today, but I think we have missed an important

1 opportunity to act decisively and with crispness on a
2 matter that's been around coming up on five years.
3 CHAIRMAN BROWN: Well, to defend the process
4 a little bit, we're going to have a couple cases coming
5 our way over the next little while that one of the key
6 words is extrapolation and statistical analysis, which
7 always makes me little bit nervous before we hit a
8 company with penalties or not allow costs that we have a
9 great deal of confidence in both the statistical
10 analysis and the extrapolation.
11 It sounds like there is still enough
12 uncertainty here that we need a little more record
13 before we go forward and make final decisions.
14 I completely agree with you, and I think
15 Peter also has come to the agreement, we do need to
16 move. This can't linger on. We can't just let the
17 record get in the way of progress, but I think we need a
18 more complete record.
19 So, I support what we are doing today. I
20 also support your call for expedition as quickly as we
21 can within properly getting that record to us.
22 COMMISSIONER ACAMPORA: I agree with
23 everything that's been said, and I think that this is an
24 important proceeding because we are talking about

1 matters that other utilities may have some problems and
2 may determine how we want to move forward with SLAs and
3 external benchmarking when it comes to these matters.
4 So, I think getting a really good grasp on
5 this, and setting up a really definitive policy when it
6 comes to those regulated utilities that we are dealing
7 with, is extremely important.
8 So, I really applaud moving forward on this.
9 I really think that Overland did a pretty good job as
10 far as bringing these matters to our attention that
11 really do need to be dealt with, and do it as soon as
12 possible, but let's do it in the right way and get this
13 policy straight, how we're dealing with all these
14 utilities.
15 CHAIRMAN BROWN: I guess I will also note we
16 are doing two things today. One is the series of
17 recommendations that we are ordering the company to
18 implement at this time, not waiting any further for
19 further record to move forward with those
20 recommendations.
21 But the other proceeding is to finalize what
22 the actual final result is, the final number that we
23 want to do. So, there's two parts to the proceeding.
24 Commissioner Harris.

1 COMMISSIONER HARRIS: Just on that piece. I
2 forgot, I looked at my notes here.
3 Part of what you said was that National Grid
4 will implement or will considering implementing the five
5 out of 10 recommendations.
6 Can you just explain what consider
7 implementing means.
8 MR. LOCHNER: Yes. What they will do is
9 they are going to examine in detail the costs and the
10 benefits of the recommendations. We want them to do
11 that. We don't want them to move forward and implement
12 recommendations that aren't to the benefit of the
13 ratepayers ultimately.
14 And so, this is the opportunity for them to
15 carefully look at the auditor's recommendations and come
16 back with a good explanation of how they are going to
17 implement it in detail, and if they believe there needs
18 to be modifications to the recommendations or they
19 shouldn't be modified.
20 In the end, we want their input and we want
21 to do the right thing and not just order them to do
22 something. So, that's why we are going about this
23 process.
24 MR. MCGOWAN: And again, if we don't agree

1 with their final balancing of the costs and benefits,
2 the commission will be in a position to order something
3 different.
4 COMMISSIONER HARRIS: I thought that the
5 company had already had an opportunity to comment on
6 those recommendations to date.
7 MR. LOCHNER: Remember that Overland gave
8 them the audit report on October 23rd, and they filed
9 their comments on November 9th. They didn't have the
10 recommendations that long.
11 Now, the other point -- let me make this
12 clear -- is almost all these recommendations their own
13 auditor has already made that they implement. A number
14 of them they have implemented.
15 So, I don't think that they are -- I think
16 we are going to get a quick response from the company on
17 this. I don't think they are -- I think to a great
18 extent they are going to be able to implement them
19 swiftly or already have.
20 CHAIRMAN BROWN: Any other comments or
21 questions?
22 COMMISSIONER SAYRE: I am afraid that with
23 the notice and comment process we are slowing down
24 perhaps the final decision on the recommendations, but I

1 think it's a necessary opportunity for other parties to
2 comment on that implementation plan because then that
3 will give us the record to order what we think is right
4 at that point.
5 CHAIRMAN BROWN: So, let's go to -- we have
6 the recommendations, the two parts, the implementation
7 plan and the new proceeding.
8 All those in favor of the recommendations
9 please say "aye".
10 (Response of "aye".)
11 Opposed?
12 (No response.)
13 No opposition, the recommendations are
14 adopted.
15 Thank you, Joe, and everybody else that
16 worked so hard on this. Good luck moving it quickly in
17 the future.
18 Second item for discussion, item 301, case
19 12-E-0577, in the matter of examining repowering
20 alternatives to utility transmission reenforcements,
21 presented by Raj Addepalli, Deputy Director of the
22 Office of Electric Gas and Water, and Liz Grisaro,
23 managing attorney of the Office of Counsel, is also
24 available for questions.

1 Raj.
2 MR. ADDEPALLI: Good morning, Chairman Brown
3 and commissioners.
4 Over the last year, we have been discussing
5 with you issues associated with generator retirement and
6 how we address reliability needs when generators retire
7 or are mothballed. I am going to use retirement and
8 mothballing synonymously for this purpose.
9 Our typical process is to seek input from
10 the New York Independent System Operator and the
11 interconnecting local utility on the reliability
12 implications of the retirement. If there are no
13 reliability concerns, generators can retire.
14 However, if there is a reliability concern
15 that needs to be addressed, it will be addressed either
16 through utility transmission upgrades or by keeping the
17 generator open until the need is addressed or if other
18 resource solutions are available.
19 Over 4,000 megawatts of generation resources
20 have retired or mothballed in the last number of years.
21 Only in two cases recently was there a need to keep the
22 generators open to address reliability needs.
23 And the commission approved reliability
24 support service contracts between National Grid and

1 Dunkirk and between NYSEG and the Cayuga plant owners to
2 keep some of those units available as those units were
3 necessary to address reliability needs. Those contracts
4 were for nine months' and 12 months' duration
5 respectively.
6 The commission also asked National Grid and
7 NYSEG to explore other alternative solutions that may be
8 in ratepayers' interest over the medium term, two to
9 four year timeframe, to address the reliability need.
10 That is how long it is expected to take for the
11 utilities to implement their own transmission projects
12 to address the reliability needs.
13 However, there is no systematic examination
14 at this time as to whether the repowering of these two
15 coal plants would be more beneficial to ratepayers over
16 the long run compared to the proposed utility
17 transmission upgrades.
18 To address this gap, staff recommends that
19 the commission institute a proceeding to examine
20 repowering as an alternative to utility transmission
21 reinforcements to meet the identified reliability needs,
22 and require both National Grid and NYSEG to analyze and
23 compare the costs and benefits of repowering the Dunkirk
24 and Cayuga generation plants with the costs of their own

1 transmission reenforcements.
2 The New York Energy Highway Task Force
3 blueprint also specifically calls for an immediate
4 analysis of the potential repowering of Dunkirk and
5 Cayuga plants.
6 The draft order in front of you directs
7 National Grid and NYSEG to estimate the costs of longer
8 term transmission solutions and file with us within 30
9 days from the order in this case.
10 The draft order also requires the utilities
11 to issue a solicitation within 30 days from the issuance
12 of this order seeking bids from the generation owners
13 for the level of any out of market payments the
14 generators would need to facilitate repowering. And the
15 generators should submit their bids within 60 days of
16 the issuance of this order.
17 The utilities are then required to compare
18 the reliability, environmental, customer and other
19 impacts of the alternative solutions and to file reports
20 of their evaluations and recommendations with the
21 commission within 90 days from the date of this order.
22 Thereafter, staff will bring any further
23 recommendations to the commission depending on the
24 results of the analyses.

1 I also want to bring to your attention one
2 minor correction to the draft order. Item two, in the
3 other impact section, subsection C, it should simply say
4 "the economy" as opposed to "the local economy" that is
5 to provide a broader perspective.
6 So, bottom line, we are trying to expedite
7 this process and get results within 90 days of the
8 issuance of this order, to value the two alternatives,
9 and pick the best one for the ratepayers' benefit.
10 That concludes my presentation, and Liz and
11 I are available to answer any questions.
12 CHAIRMAN BROWN: I just want to emphasize
13 how important I think -- you just talked about the other
14 impacts besides reliability, that this needs to be a bit
15 of a broader look than the next three years, what is the
16 cheaper alternative.
17 And consideration I think really needs to be
18 given of if that generating facility, if it gets
19 repowered, provides you probably 40 to 50 years of a new
20 source. It's got to be a longer term look as you
21 analyze the repowering now.
22 MR. ADDEPALLI: That's correct.
23 CHAIRMAN BROWN: Transmission upgrades also
24 have a more permanent life as well. So, you just have

1 to look at the specifics of the case I think in order to
2 really provide the proper analysis here.
3 MR. ADDEPALLI: Absolutely.
4 COMMISSIONER HARRIS: Raj, are you just
5 taking out the word "local" --
6 MR. ADDEPALLI: Yes.
7 COMMISSIONER HARRIS: -- under 2C?
8 That's it. Okay.
9 CHAIRMAN BROWN: Any other comments or
10 questions on this?
11 COMMISSIONER ACAMPORA: I have just a quick
12 question.
13 Have we -- we have retired plants in the
14 past. Have we ever associated the thinking that we have
15 now in the past about the importance of at least looking
16 at the option of repowering? I am just kind of
17 wondering if we have missed some opportunities in the
18 past?
19 MR. ADDEPALLI: I believe there were
20 informal evaluations by the utilities and staff, but
21 this one is going to be a more formal -- it will shine
22 the light on the numbers and make sure, as the chairman
23 said, we look at longer term impacts, as well as
24 broader, beyond just the reliability benefits, there are

1 other impacts that need to be looked at.
2 COMMISSIONER ACAMPORA: I think it's really
3 important and this is a really good move.
4 CHAIRMAN BROWN: Let's take all those in
5 favor of the recommendations as described by Raj, please
6 say "aye".
7 (Response of "aye".)
8 Opposed?
9 (No response.)
10 Hearing none, the recommendations are
11 adopted.
12 Thank you, Raj and Liz.
13 The final two items for discussion will be
14 presented together, items 501A and 501B, case 10-C-0202,
15 proceeding on motion of the commission to consider the
16 adequacy of Verizon New York's service quality
17 implementation plan. Presented by Chad Hume, Director
18 of the Office of Telecommunications.
19 Good morning, Chad.
20 MR. HUME: Good morning, Chairman Brown and
21 commissioners.
22 Before you today are two items dealing with
23 Verizon's service quality and consideration of remedial
24 actions to improve performance in certain areas.

1 I will start with item 501B, which
2 recommends approval of a draft order that resolves a
3 petition by the Attorney General of New York State filed
4 in April 2012 requesting modification of Verizon New
5 York's service quality improvement plan, otherwise known
6 as the SQIP.
7 The petition essentially requests that the
8 commission reinstate its pre-SQIP service quality
9 metrics and enforce them with sufficient penalties and
10 rebates.
11 Its main points are that the SQIP is not
12 ensuring that adequate service quality is being provided
13 to all Verizon customers, and that competition does not
14 have any impact on Verizon's service quality that the
15 commission expected when it adopted the SQIP in December
16 2010.
17 In adopting the SQIP, the commission sought
18 to apply its longstanding policy of adapting telephone
19 regulation to the needs of an increasingly competitive
20 market. Accordingly, the SQIP streamlined many of the
21 existing service quality metrics and reporting
22 requirements, and directed, among other things, that
23 Verizon focus its service quality efforts on core
24 customers, finding that those customers have limited

1 options available to them other than regulatory
2 protections.
3 The SQIP defines "core" as residential
4 lifeline customers, those with special needs such as
5 those with medical conditions, or who are elderly, blind
6 or disabled, and customers without competitive choice.
7 Core customers currently consist of
8 approximately eight percent of Verizon's total
9 customers, or around 320,000.
10 In addition to the Attorney General's
11 claims, the draft order considers comments by other
12 parties that included Verizon, Communication Workers of
13 America, and Joint Commentators, representing many civic
14 organizations and members of the public.
15 The draft order concludes that the
16 underlying premise for adopting the SQIP, to protect
17 customers most in need of protection in the face of
18 declining resources and increasing competition is as
19 compelling today as it was when the plan was first
20 adopted.
21 It finds the choice of telecommunications
22 services for residential customers is not diminished.
23 In fact, the order finds that the market has become more
24 competitively robust, and Verizon continues to lose

1 market share and revenues to both cable and wireless
2 alternatives.
3 A review of SQIP data indicates that, for
4 core customers, Verizon has performed relatively well,
5 meeting out of service greater than 24 hours and service
6 affecting greater than 48 hour standards well over 90
7 percent of the time, including periods where storms or
8 other circumstances produced abnormal results.
9 Since adoption of the SQIP, there have been
10 only six incidents in over 200 measurement opportunities
11 over the course of 21 months where Verizon has been
12 subject to penalty action, and in lieu of further
13 proceedings has made payments of a hundred thousand
14 dollars per miss as required by the plan.
15 Additionally, for all customers, core and
16 non-core, Verizon's performance for customer trouble
17 report rates, the key metric for measuring network
18 reliability, demonstrates no material deterioration
19 under the SQIP.
20 Data does indicate, though, for non-core
21 residential customers it does not appear that Verizon's
22 service quality has improved. However, we find that
23 expanding the SQIP to include non-core residential
24 customers for this reason is unwarranted, given that

1 these customers have choice and are therefore not
2 without recourse.
3 What is clear is that, as the migration to
4 broadband and wireless networks continues, the company's
5 ability to maintain staffing levels, and investments
6 necessary to achieve the highest level of service
7 quality for all customers in its footprint, is
8 compromised due to diminished revenues from these
9 customer migrations.
10 A requirement for Verizon to comply with the
11 full panoply in service quality metrics for non-core
12 residential customers at the levels sought by the
13 Attorney General would essentially force the company to
14 incur costs to rehabilitate and operate an increasingly
15 obsolete network.
16 Such an action would attenuate service
17 quality problems and undermine service quality to those
18 core customers who need the protections most.
19 The proposed order does conclude that
20 certain aspects of Verizon's service quality may need
21 improvement. These issues are addressed in item 501A,
22 the proposed notice on tariff modifications and business
23 lines.
24 As previously noted by the commission,

1 Verizon's performance in repairing out of service
2 conditions for core customers beyond the initial 24 hour
3 repair metric window is of a concern. While existing
4 metric provides some measure of protection, once the 24
5 hour window has elapsed we believe there is insufficient
6 incentive to restore service as soon as practicable.
7 Therefore, we believe specific tariff
8 changes may be warranted in order to encourage faster
9 response from Verizon in the event the company misses
10 the initial 24 hour metric restoration period.
11 Staff recommends issuance of a notice
12 soliciting comments on proposed tariff modifications for
13 core customers that would make rebates for out of
14 service conditions more automatic, and increase the
15 rebate amount the longer the trouble is unresolved.
16 Specifically, we propose that rebates for
17 core customers should be increased from the 2/30ths of a
18 monthly bill after the first 24 hours and to 3/30ths of
19 a monthly rate on and after 72 hours of a service
20 interruption.
21 Under these revised parameters, the affected
22 core customer would receive a full month's credit by the
23 twelfth day of the interruption provided service has not
24 yet been restored.

1 With regard to business service quality,
2 staff's review of data provided in response to the
3 commission's concerns raised in November 2011 indicates
4 that, generally, while the percentage of troubles
5 experienced on these customer lines is better than that
6 of total core and non-core customers statewide,
7 Verizon's performance in repairing troubles within 24
8 hours is poorer than its repair performance for its
9 core.
10 In fact, performance for basic business
11 service appears to mirror the subpar performance
12 experienced for non-core customers since the inception
13 of the SQIP.
14 While business access lines are currently
15 subject to SQIP treatment in white spot areas, that is
16 those areas where no wireline competition exists in the
17 residential market, this criteria for excluding basic
18 business lines from SQIP protection in non-core areas
19 may not be appropriate if competition is not as robust
20 for business as it is for residential.
21 Pursuant to the uniform measurement
22 guidelines, the SQIP currently includes voice grade
23 business access lines, business centrex, payphone and
24 voice-grade PBX trunks in the core areas.

1 In light of these concerns, staff has sought
2 to examine the competitiveness in the business market
3 statewide. Our general understanding is that cable
4 companies' market share in the business segment,
5 although gaining, is relatively small.
6 A preliminary analysis of wholesale
7 migration data indicates that residential customers are
8 choosing alternative providers at a far greater rate
9 than business customers.
10 Therefore, in the proposed notice, we are
11 recommending that Verizon be directed to perform and
12 file with the commission a root cause analysis of, and
13 remedy plan for, out of service conditions associated
14 with basic business services.
15 This should allow the commission to identify
16 and implement a more tailored regulatory response if
17 business customers are indeed experiencing poor service
18 quality because they, too, should be afforded
19 protections if insufficient competitive alternatives
20 exist.
21 In addition, the notice seeks comment on a
22 proposal to apply the automatic 3/30ths tariff-based
23 rebate enhancement discussed previously to these
24 business services.

1 Finally, the notice would also direct staff
2 to conduct an end user-focused dialogue to enhance our
3 understanding of the nature of the business service
4 quality problems, as well as a broader dialogue with the
5 industry on the status of competition and barriers
6 thereto.
7 For the items proposed, Verizon would be
8 required to respond within 30 days of the issuance date
9 of this notice. Interested parties will also be invited
10 to comment on these proposals.
11 Following its review of comments and further
12 analysis, staff would present its findings and
13 recommendations to the commission at a subsequent
14 session.
15 That concludes my presentation on the items
16 and I'm happy to entertain any comments, concerns or
17 questions.
18 CHAIRMAN BROWN: Thank you.
19 I am just going to start with a couple of
20 comments. You know, when we went to the core -- first
21 of all, I am happy that for the core customers that we
22 have identified, the customers that most need the
23 service, that the service quality has been maintained
24 pretty well, that we have achieved what we wanted to

1 achieve, which was get a focus on to the customers that
2 need it the most. I think that's a positive.
3 It was never an invitation, however, to let
4 non-core customers deteriorate. I think we made that
5 clear when we originally did that. So, we do keep our
6 eyes I think very -- on the core customers, or non-core
7 customers, even if they have alternatives, because we
8 don't always know how many alternatives are out there
9 and where they are or where they aren't.
10 That gets me to the business group. What we
11 don't have right now, I think we just discovered as we
12 went through this, is a lot of data to know where I
13 think what Mark Reeder described as white business
14 areas, in other words, a place there is adequate
15 competition for residential customers.
16 But the strip mall, whatever sort of
17 business, may not actually have some alternatives
18 available to them. We don't really know a lot, and
19 that's what I think part of this process we are trying
20 to learn, is this a problem or isn't this a problem for
21 business customers.
22 Are there business customers that don't have
23 alternatives that when they are not getting service
24 repairs in a timely basis their business is jeopardized

1 in a serious way and they don't have an alternative way
2 of communicating with the world.
3 We need to know more information before I
4 think we apply metrics and divert the company from
5 maintaining their success ratio for the core customers
6 that are out there.
7 So, I think this is a useful proceeding to
8 try to find out a little bit more about where the
9 problems really exist, especially for this small
10 business group that's kind of undefined and amorphous at
11 this point, and really having good, hard data on it.
12 I know Commissioner Sayre wanted to...
13 COMMISSIONER SAYRE: I have a few comments
14 in support of the recommendation to take a harder look
15 at the small business customer market.
16 I don't have a statistically significant
17 extrapolation here, but we are seeing an increase in the
18 number of Verizon small business customer complaints to
19 our consumer service's call centers, including
20 complaints of repeated outages on the same lines,
21 ineffective repairs, and seven-day intervals being given
22 to fix out of service conditions.
23 I am hoping that this is not a trend, but
24 just a short term issue that can be addressed by the

1 company. And I particularly understand the huge effort
2 that Verizon is currently making in New York City to
3 replace damaged copper with fiber that will withstand
4 the next superstorm, but I am asking that the Office of
5 Consumer Services continue to monitor these types of
6 complaints and keep the commissioners appraised of the
7 trends.
8 And I very look forward to the filing we are
9 asking Verizon to make about service to basic business
10 customers.
11 CHAIRMAN BROWN: Commissioner Acampora.
12 COMMISSIONER ACAMPORA: I totally agree with
13 Commissioner Sayre. We know that Superstorm Sandy
14 really wreaked a lot of havoc, and I think it's
15 important that during this transition for the company in
16 getting rid of some of its old copper line system and
17 moving toward FIOS, that we do give them the
18 opportunity.
19 But I think it is important, as the chairman
20 said, to gather the information, to make sure that --
21 particularly small businesses that we need desperately
22 in our state to rebound from that storm, have an
23 opportunity to have repairs done in a quick and
24 efficient manner, and the opportunity that we find out

1 if they have options for different service when they
2 feel that the problems are not being resolved quickly.
3 The superstorm, I don't think we have yet to
4 see the economic ramifications from what happened, so
5 it's really important to make sure that these small
6 businesses do have what is necessary for them to operate
7 and to keep people employed.
8 So, I think the proceeding is a good one. I
9 would hope that as we move forward that the
10 communication with the company in letting us know what
11 their plans are is extremely important. We need to have
12 this dialogue. We can't just sit here and guess what's
13 going on over there.
14 So, I think this opens the door for an
15 opportunity for better communication with the company so
16 that the people of our state are better served.
17 So, good job. Thank you.
18 CHAIRMAN BROWN: Thank you, Commissioner
19 Acampora.
20 Any other comments or questions?
21 COMMISSIONER LAROCCA: Two things. One is
22 this notion that's been around that if we were to
23 require the company to report on or be held to some
24 metrics of service quality to the business sector, the

1 small business sector, there was a danger that their
2 efforts would be diverted or diluted, and that the core
3 would then somehow be neglected, I find that a troubling
4 idea.
5 If we find it necessary and in the public
6 interest to gather more information and to hold them to
7 a more enforceable standard on a non-core category,
8 which we might describe as small business, I think it
9 would come with a heavy burden if they say, well, we
10 can't do as good a job on the other. That's just not an
11 acceptable frame of thinking in my mind.
12 We shouldn't think it and they shouldn't
13 think that we think it and they shouldn't think it. The
14 reporting and the requirement will be what we find is
15 necessary.
16 The second concern I have through the
17 discussions we've had in the last week or so is that
18 there is -- the chairman mentioned there is no uniform
19 definition of small business.
20 In the early days, the SBA -- somebody once
21 observed that everything but General Motors was small
22 business under the SBA definitions. We certainly don't
23 mean that here, but I think we know what we mean when we
24 are talking about smaller business in a place like New

1 York. Mom and pops, small businesses perhaps defined by
2 a small number of employees and so forth.
3 So, if we -- and I think what Commissioner
4 Sayre made reference to is what anecdotally has been
5 heard a little bit from indisputably smaller enterprises
6 that we -- while we are thinking about all this, that we
7 get to work on defining some boundaries or some
8 definitions of the small business categories that we
9 would be concerned about from a service quality point of
10 view upon which we might require some reporting.
11 But right now we can't say what we mean, I
12 am told, and the company hasn't been able to tell us
13 even in whole numbers what they mean. So, I think we
14 need to get that definitional work done. While we go
15 forward in considering whether or not we are going to
16 extend any reporting into that sector, we need to know
17 what sector we are talking about.
18 MR. HUME: I would agree, and it's our
19 intent, our intent through the notice and the
20 information that we gather through that notice, to be
21 able to more clearly define those sectors of the
22 business community, whether it's defined based upon the
23 services Verizon has to provide, or other competitors
24 have to provide, but we should be able to, through this

1 process, have a clearer definition of that segment of
2 the business community that may be a concern.
3 COMMISSIONER HARRIS: If I can, I
4 wholeheartedly agree that we need to look at which
5 businesses we are talking about. We keep referring to
6 small businesses and needing the protections and I
7 agree, but as we've come to learn during Hurricane
8 Sandy, it was even impossible for the company to discern
9 which mom and pop shops may have been residential or
10 small business because some of those small businesses
11 actually don't take the basic business product. They
12 would take a separate product sometimes.
13 So, and as it's defined now you either have
14 Enterprise, what Commissioner Larocca -- General Motors,
15 and residential, and every other business is in between.
16 But we are talking about, or are we talking about the
17 basic business product.
18 So, I think, like you are saying, getting
19 the right categories and definitions to discuss, and the
20 data within those categories, I think will be helpful.
21 For example, I know in Sandra Sloane's
22 office she has complaints for non-residential, but that
23 could be -- is it based on the business product that
24 they take? I mean you could have a business with 300

1 employees taking a basic business product, and we would
2 lump that into the same category as potentially a mom
3 and pop pizza shop.
4 So, they are very different animals, but
5 they may be taking the same product, but are afforded
6 the same protections. So, that's just something I want
7 to delve down and get some more data so we are not --
8 CHAIRMAN BROWN: Guessing.
9 COMMISSIONER HARRIS: -- we are not
10 guessing, and we're not -- I want to narrow down these
11 categories a little bit more based on products and maybe
12 the nature of the size of the company as well.
13 But as we get forward and get this data, I
14 think I would like to look at the state of competition
15 for the business community, and what it was last year,
16 what it is this year, where we see the trends going for
17 this business category.
18 I think that might need a broader
19 perspective than just the company to gather this
20 information, but I'd like to see that if competition is
21 increasing and how fast it might be increasing, and if
22 it's not increasing what are those obstacles and what
23 are those barriers.
24 Are they within the company's control? Are

1 they franchise agreements in the city? Is it geographic
2 obstacles? So, that's part of what I am looking for in
3 this proceeding as well.
4 MR. HUME: I think from our perspective
5 those are all questions that we at the staff level
6 understand. Not only ourselves needing a better
7 understanding, but to be able to answer those questions
8 and give the commission a much better understanding of,
9 for wont of a better term, you know, the status of the
10 business telephone market in New York today and going
11 forward and what we envision as already happened and
12 what may be happening.
13 COMMISSIONER SAYRE: I would like to invite
14 the company and commenting parties to comment on what
15 should be the appropriate definition of small business,
16 because we have all got a pretty good understanding that
17 if you are General Motors or IBM we really don't need to
18 be monitoring their service quality directly and
19 establishing penalties and programs because they procure
20 their telecommunications service competitively.
21 And if they don't like the service provider
22 that they are using they have a lot of choices, but
23 where you draw the line between those big enterprise
24 customers and a one line or two line pizza parlor I

1 don't know and would welcome guidance.
2 CHAIRMAN BROWN: I think we need to take
3 votes on two different items here.
4 So, we start with 501A, that's the notice
5 directing Verizon to perform the root cause analysis,
6 etc., as Chad described it.
7 So, all those in favor of the
8 recommendations in 501A please say "aye".
9 (Response of "aye".)
10 Opposed?
11 (No response.)
12 Hearing no opposition, the recommendations
13 are adopted.
14 The second vote is on 501B, the order
15 resolving the Attorney General petition and requiring
16 further investigation, once again as described by Chad.
17 All those in favor please say "aye".
18 (Response of "aye.")
19 Opposed?
20 (No response.)
21 Hearing none, the recommendations are
22 adopted.
23 Before we adjourn, we have one more piece of
24 business this morning. I know I have been disconcerted

1 all day because out of my right eye on peripheral vision
2 is supposed to be Jackie Brilling over there, and I find
3 her out there, which has confused me all morning. It's
4 just not the place she's supposed to be and where she's
5 been since I've been doing this for over five years.
6 But I would like to offer a resolution of
7 the Public Service Commission of the State of New York
8 for Jackie. So, I would like to enter into the record
9 as follows and take a vote at the end.
10 Whereas, Jaclyn A. Brilling, Jackie, has
11 served the citizens of the State of New York through a
12 variety of positions as Secretary of the Public Service
13 Commission, Secretary to the New York State Board on
14 Electric Generation Siting and the Environment,
15 Administrative Law Judge, Assistant Counsel in the
16 Department of Public Service, Deputy Counsel and
17 Associate Counsel at the Commission on Cable Television,
18 Ethics Officer to the Public Service Commission
19 Department of Public Service.
20 Whereas, she served the citizens of the
21 state for over 33 years, starting at the age of 12.
22 Whereas, she holds a bachelor's degree in
23 international economics from Georgetown University and a
24 Juris Doctorate from the Vermont Law School.

1 And whereas, she served with great
2 enthusiasm and purpose for seven years on the
3 department's Employees Assistance Program committee,
4 assisting numerous employees within the agency in many
5 ways.
6 Whereas, she helped train many employees in
7 alternative dispute resolution, including facilitation
8 skills and mediation training.
9 Whereas, she aided many consumers along the
10 way using her strong skills in mediation and
11 collaborations over her career.
12 And whereas, she dedicated herself to the
13 development of improved technologies, including the
14 movement from the outdated case management system to the
15 document and management system, where she spent
16 countless hours tirelessly working to ensure migration
17 of thousands of documents from paper form to electronic
18 form, and took the lead role in preparing new, hard
19 rules allowing for electronic service of commission
20 documents.
21 And whereas, she enthusiastically
22 entertained us over many years as a member of the
23 department's holiday choir, a regular participant in the
24 director's cup golf tournament, and as she reminds us

1 every March, is a faithful and loyal fan of the Hoyas.
2 Now, therefore it be resolved that the New
3 York State Public Service Commission expresses its
4 appreciation to Jaclyn A. Brilling for her faithful
5 service, extends best wishes to Jackie, her husband
6 Michael, and their five children J.B., Allison, Mickey,
7 Andrew and Matthew.
8 And further directs that this resolution be
9 entered into the public record of the commission session
10 on this date and that a copy of it be presented to
11 Jackie.
12 Therefore, all those in favor of this
13 resolution please say "aye".
14 (Response of "aye".)
15 Opposed?
16 (No response.)
17 Hearing none, the resolution is adopted.
18 Once again, thank you, Jackie.
19 (Applause)
20 Just once again, thank you so much for your
21 service, moving us from the 19th century to the 21st
22 century. Our old system wasn't even 20th century I
23 don't think. And all the dedication you showed in
24 getting that project.

1 I know from the time I got here -- and it's
2 gone smoothly relatively. I mean it's amazing how well
3 that seems to be working. Usually things don't work
4 that smoothly.
5 So, once again, thank you for all you have
6 done for the department.
7 COMMISSIONER HARRIS: I just wanted to say a
8 few words.
9 Jackie, it's been an absolute pleasure to
10 work with you the past six and a half years. You have
11 been helpful since the moment I walked in the door, and
12 you'll probably remain to be helpful to all of us and to
13 the department and the commission in years to come.
14 You are missed already and I wish you all
15 the best.
16 COMMISSIONER SAYRE: I would like to add my
17 appreciation of Jackie for the years in which I was
18 practicing before the commission rather than sitting on
19 the commission.
20 She has been invaluable to many people on
21 the outside, teaching them and me how to find things in
22 the commission's files and how to do things in the right
23 way.
24 COMMISSIONER ACAMPORA: I, too, would like

1 to join my colleagues in thanking Jackie for the many
2 years that I have been here.
3 I found this lady greeting me to drag me
4 through the process of being confirmed, and then taking
5 me by the hand and showing me the ropes on how to be a
6 good commissioner.
7 She is always there for everyone. She has a
8 wonderful heart. And I know all the people that have
9 worked closely with her truly do miss her. I am sure
10 that she will remain friendly with all of them. They
11 have made long friendships.
12 So, for all the years of your public
13 service, Jackie, which so many people never get to know,
14 when you talk over 30 years of service to the people of
15 the State of New York, you and your family have
16 something to be very proud of. For those New Yorkers
17 who don't know you, I thank you on their behalf.
18 CHAIRMAN BROWN: Thank you. I think we are
19 complete here today.
20 COMMISSIONER LAROCCA: Just a quick word
21 from New York.
22 Jackie, I'm sorry I can't be up there today.
23 I was called away unexpectedly.
24 I just can't understand how such a young

1 girl could be retiring with all those years behind her.
2 All the best to you. I hope you stay in touch with us
3 all.
4 CHAIRMAN BROWN: Thank you very much,
5 commissioner.
6 Any other -- I don't have my script in front
7 of me. I don't know how to say this.
8 DEPUTY SECRETARY LYNCH: That completes
9 today's agenda. I would like to make one announcement,
10 though.
11 The next regularly scheduled session will be
12 held here in Albany on February 13th, beginning at 10:30
13 a.m. That is a change from the venue that was published.
14 CHAIRMAN BROWN: We had originally scheduled
15 New York City, but it's going to be in Albany on
16 February 13th.
17 DEPUTY SECRETARY LYNCH: Yes.
18 CHAIRMAN BROWN: It's also a Wednesday and
19 not a Thursday.
20 DEPUTY SECRETARY LYNCH: It's a Wednesday
21 instead of a Thursday.
22 CHAIRMAN BROWN: Okay, very good.
23 Meeting is adjourned.
24 (Meeting adjourned at 1:19 p.m.)

$

$11 [2] - 14:22, 18:12
$175,000 [1] - 17:6
$26 [1] - 8:20
$44 [4] - 13:13, 13:15, 16:7, 16:24
$50 [1] - 10:3

1

1.8 [1] - 11:24
10 [2] - 17:8, 33:5
10-C-0202 [1] - 41:14
10-M-0451 [1] - 7:12
10:30 [2] - 1:6, 65:12
10th [1] - 19:23
11.2 [1] - 11:14
110 [1] - 12:11
113(2 [1] - 3:10
12 [3] - 16:11, 37:4, 60:21
12-E-0577 [1] - 35:19
12-W-0051 [1] - 3:9
13th [2] - 65:12, 65:16
1425 [2] - 11:23, 27:17
17 [3] - 1:6, 2:4, 3:2
176 [2] - 12:9, 15:4
19th [3] - 1:8, 2:5, 62:21
1:19 [1] - 65:24

2

2 [1] - 7:24
2/30ths [1] - 46:17
20-month [1] - 11:20
200 [2] - 5:22, 44:10
2009 [2] - 8:2, 29:15
201 [1] - 7:12
2010 [7] - 8:14, 9:1, 9:8, 9:10, 9:23, 28:6, 42:16
2011 [9] - 9:23, 10:2, 10:8, 10:12, 11:13, 27:22, 28:7, 28:10, 47:3
2012 [4] - 14:6, 14:19, 28:11, 42:4
2013 [3] - 1:6, 2:4, 3:2
20th [1] - 62:22
21 [1] - 44:11
21st [1] - 62:21
23rd [2] - 10:20, 34:8
24 [7] - 10:2, 44:5, 46:2, 46:4, 46:10, 46:18, 47:7
267 [1] - 3:21
2C [1] - 40:7

3

3 [2] - 1:8, 9:9
3/30ths [2] - 46:18, 48:22
30 [4] - 38:8, 38:11, 49:8, 64:14
30,000 [1] - 23:16
300 [2] - 12:2, 56:24
301 [1] - 35:18
320,000 [1] - 43:9
33 [1] - 60:21
36 [1] - 15:7
37 [1] - 15:4

4

4 [1] - 10:11
4,000 [1] - 36:19
40 [1] - 39:19
464 [1] - 3:9
48 [1] - 44:6

5

5 [3] - 11:17, 12:1, 23:19
50 [1] - 39:19
501A [4] - 41:14, 45:21, 59:4, 59:8
501B [3] - 41:14, 42:1, 59:14
536,000 [2] - 12:2, 23:15

6

6 [2] - 8:23, 13:10
60 [2] - 16:24, 38:15
600 [1] - 4:4
61 [1] - 12:22

7

7 [1] - 14:3
72 [1] - 46:19

8

8 [1] - 15:2

9

9 [1] - 14:5
90 [3] - 38:21, 39:7, 44:6
95 [1] - 13:19
9th [1] - 34:9

A

a.m [2] - 1:6, 65:13
abide [1] - 5:7
ability [2] - 20:19, 45:5
able [8] - 10:21, 20:14, 23:19, 34:18, 55:12, 55:21, 55:24, 58:7
abnormal [1] - 44:8
absolute [1] - 63:9
Absolutely [1] - 40:3
abstain [2] - 3:17, 3:20
abstention [1] - 7:5
ACAMPORA [6] - 1:14, 31:22, 40:11, 41:2, 52:12, 63:24
Acampora [2] - 52:11, 53:19
accept [1] - 26:21
acceptable [1] - 54:11
access [2] - 47:14, 47:23
accomplished [1] - 21:20
accordingly [1] - 42:20
account [1] - 25:14
accounting [12] - 10:15, 10:22, 11:4, 12:10, 12:15, 13:1, 13:6, 14:11, 14:17, 17:16, 28:18, 28:20
Accounting [1] - 7:16
accounts [1] - 21:18
achieve [2] - 45:6, 50:1
achieved [1] - 49:24
act [5] - 4:9, 26:1, 26:2, 26:19, 31:1
acting [1] - 4:14
action [5] - 6:6, 26:11, 26:12, 44:12, 45:16
actions [1] - 41:24
activate [1] - 21:16
activity [1] - 12:17
actual [2] - 28:12, 32:22
adapting [1] - 42:18
add [1] - 63:16
Addepalli [1] - 35:21
ADDEPALLI [5] - 36:2, 39:22, 40:3, 40:6, 40:19
addition [2] - 43:10, 48:21
additional [4] - 10:13, 22:20, 26:5, 28:11
additionally [1] - 44:15
address [6] - 36:6, 36:22, 37:3, 37:9, 37:12, 37:18
addressed [6] - 2:17, 36:15, 36:17, 45:21, 51:24
adequacy [1] - 41:16
adequate [2] - 42:12, 50:14
adjourn [1] - 59:23
adjourned [2] - 65:23, 65:24
adjustment [4] - 8:20, 8:21, 18:14, 18:21
adjustments [5] - 9:13, 17:19, 19:24, 20:2, 20:6
administrative [3] - 25:4, 25:10, 27:6
Administrative [1] - 60:15
adopted [8] - 7:10, 35:14, 41:11, 42:15, 43:20, 59:13, 59:22, 62:17
adopting [2] - 42:17, 43:16
adoption [1] - 44:9
advice [1] - 27:8
advise [1] - 26:21
advisory [2] - 26:23, 27:8
affected [3] - 13:15, 15:5, 46:21
affecting [1] - 44:6
affiliate [5] - 7:14, 8:19, 9:12, 12:12, 13:7
affiliated [1] - 12:13
affiliates [3] - 8:7, 12:13, 13:2
afforded [2] - 48:18, 57:5
afraid [1] - 34:22
age [1] - 60:21
Agency [1] - 1:8
agency [1] - 61:4
agenda [8] - 3:7, 3:16, 3:18, 3:24, 4:4, 7:4, 7:11, 65:9
agree [7] - 31:14, 31:22, 33:24, 52:12, 55:18, 56:4, 56:7
agreed [2] - 5:7, 21:14
agreement [2] - 27:21, 31:15
agreements [2] - 8:9, 58:1
aided [1] - 61:9
airing [1] - 20:13
Albany [4] - 1:9, 2:5, 65:12, 65:15
ALJ [1] - 25:13
Allison [1] - 62:6
allocated [4] - 12:12, 12:14, 12:20, 15:24
allocation [16] - 3:11, 10:16, 10:23, 11:2, 11:3, 11:4, 12:10, 13:1, 13:6, 14:12, 14:17, 15:20, 15:22, 17:16, 28:18, 28:20
allocations [4] - 7:14, 8:19, 9:12, 11:22
allow [6] - 18:10, 20:21, 26:5, 27:6, 31:8, 48:15
allowing [1] - 61:19
allows [1] - 23:21
almost [1] - 34:12
alone [1] - 4:13
alternative [7] - 37:7, 37:20, 38:19, 39:16, 48:8, 51:1, 61:7
alternatively [1] - 27:4
alternatives [8] - 35:20, 39:8, 44:2, 48:19, 50:7, 50:8, 50:17, 50:23
amazing [1] - 63:2
America [1] - 43:13
American [1] - 3:12
amorphous [1] - 51:10
amount [3] - 12:12, 23:18, 46:15
amounts [2] - 13:16, 16:12
analyses [1] - 38:24
analysis [10] - 16:5, 22:1, 31:6, 31:10, 38:4, 40:2, 48:6, 48:12, 49:12, 59:5
analyze [2] - 37:22, 39:21
Andrew [1] - 62:7
anecdotally [1] - 55:4
animals [1] - 57:4
anniversary [1] - 29:20

announcement [1] - 65:9
annual [1] - 13:24
answer [3] - 26:10, 39:11, 58:7
anticipating [1] - 29:5
appear [2] - 13:8, 44:21
appeared [1] - 11:14
applaud [1] - 32:8
Applause [1] - 62:19
application [1] - 22:22
apply [3] - 42:18, 48:22, 51:4
appraised [1] - 52:6
appreciation [2] - 62:4, 63:17
approach [2] - 23:10, 29:20
appropriate [3] - 19:10, 47:19, 58:15
approval [2] - 3:10, 42:2
approve [1] - 4:15
approved [3] - 4:19, 5:3, 36:23
April [1] - 42:4
arduous [1] - 29:4
area [2] - 11:18, 16:3
areas [6] - 41:24, 47:15, 47:16, 47:18, 47:24, 50:14
arguing [1] - 30:3
argument [1] - 2:18
arguments [1] - 20:10
aspects [1] - 45:20
Assistance [1] - 61:3
Assistant [3] - 3:6, 3:14, 60:15
ASSISTANT [1] - 3:8
assisting [1] - 61:4
Associate [1] - 60:17
associated [4] - 26:18, 36:5, 40:14, 48:13
assume [1] - 25:13
assure [1] - 4:20
attention [2] - 32:10, 39:1
attenuate [1] - 45:16
attorney [1] - 35:23
Attorney [6] - 9:3, 29:17, 42:3, 43:10, 45:13, 59:15
audit [21] - 8:3, 10:10, 10:14, 11:6, 11:9, 11:12, 17:15, 19:24, 22:12, 22:17, 22:20, 22:24, 23:7, 27:14, 28:8, 28:9, 28:12, 29:2, 29:18, 34:8
auditing [3] - 21:3, 23:4, 23:6
auditor [7] - 8:8, 14:10, 17:9, 20:10, 21:3, 28:6, 34:13
auditor's [2] - 17:23, 33:15
auditors [1] - 23:23
audits [3] - 22:3, 23:4, 29:3
authority [4] - 5:17, 26:1, 26:2, 26:9
authorize [1] - 2:19
automatic [2] - 46:14, 48:22
availability [2] - 5:15, 6:8
available [8] - 6:2, 24:23, 35:24, 36:18, 37:2, 39:11, 43:1, 50:18
aye [1] - 59:18
aye" [12] - 3:24, 7:5, 7:6, 35:9, 35:10, 41:6, 41:7, 59:8, 59:9, 59:17, 62:13, 62:14

B

bachelor's [1] - 60:22
background [3] - 7:21, 7:24, 22:23
backup [1] - 27:17
balance [1] - 24:18
balancing [1] - 34:1
band [2] - 16:15, 16:24
bands [1] - 16:22
barriers [2] - 49:5, 57:23
based [6] - 12:7, 13:10, 48:22, 55:22, 56:23, 57:11
basic [7] - 47:10, 47:17, 48:14, 52:9, 56:11, 56:17, 57:1
basis [3] - 15:22, 26:16, 50:24
batch [1] - 4:12
become [1] - 43:23
began [1] - 10:10
begin [1] - 5:19
beginning [4] - 10:17, 25:1, 27:19, 65:12
begun [1] - 14:14
behalf [1] - 64:17
behind [1] - 65:1
beliefs [1] - 2:14
below [2] - 12:6, 12:19
benchmarking [1] - 32:3
beneficial [1] - 37:15
benefit [5] - 19:21, 21:10, 24:19, 33:12, 39:9
benefits [4] - 33:10, 34:1, 37:23, 40:24
benefitted [1] - 15:17
benefitting [1] - 12:13
benevolent [1] - 13:8
best [4] - 39:9, 62:5, 63:15, 65:2
better [8] - 22:6, 25:2, 47:5, 53:15, 53:16, 58:6, 58:8, 58:9
between [8] - 3:11, 17:9, 20:9, 30:17, 36:24, 37:1, 56:15, 58:23
beyond [2] - 40:24, 46:2
bias [1] - 13:5
bids [2] - 38:12, 38:15
big [1] - 58:23
Bill [1] - 25:13
bill [5] - 13:24, 14:1, 23:15, 23:16, 46:18
billion [3] - 11:24, 12:1, 23:19
billions [1] - 28:21
bills [1] - 11:7
bit [7] - 6:20, 31:4, 31:7, 39:14, 51:8, 55:5, 57:11
blind [1] - 43:5
blueprint [1] - 38:3
Board [2] - 2:5, 60:13
Boston [2] - 9:2, 29:17
bottom [1] - 39:6
boundaries [1] - 55:7
bounds [1] - 13:18
BOUTEILLER [4] - 21:2, 24:20, 26:19, 29:1
break [1] - 18:7
briefings [1] - 19:21
Brilling [3] - 60:2, 60:10, 62:4
bring [3] - 21:17, 38:22, 39:1
bringing [1] - 32:10
broadband [1] - 45:4
broader [5] - 39:5, 39:15, 40:24, 49:4, 57:18
broke [1] - 16:15
BROWN [32] - 1:14, 3:1, 3:14, 3:22, 4:17, 5:2, 5:5, 5:11, 6:19, 7:1, 18:17, 19:19, 25:22, 26:10, 31:3, 32:15, 34:20, 35:5, 39:12, 39:23, 40:9, 41:4, 49:18, 52:11, 53:18, 57:8, 59:2, 64:18, 65:4, 65:14, 65:18, 65:22
Brown [2] - 36:2, 41:20
Building [1] - 1:8
built [1] - 11:16
burden [1] - 54:9
business [46] - 45:22, 47:1, 47:10, 47:14, 47:18, 47:20, 47:23, 48:2, 48:4, 48:9, 48:14, 48:17, 48:24, 49:3, 50:10, 50:13, 50:17, 50:21, 50:22, 50:24, 51:10, 51:15, 51:18, 52:9, 53:24, 54:1, 54:8, 54:19, 54:22, 54:24, 55:8, 55:22, 56:2, 56:10, 56:11, 56:15, 56:17, 56:23, 56:24, 57:1, 57:15, 57:17, 58:10, 58:15, 59:24
businesses [6] - 52:21, 53:6, 55:1, 56:5, 56:6, 56:10

C

Cable [1] - 60:17
cable [4] - 4:3, 4:22, 44:1, 48:3
career [1] - 61:11
carefully [3] - 8:10, 21:12, 33:15
case [20] - 3:9, 7:12, 8:14, 9:22, 9:24, 14:21, 15:1, 20:19, 22:5, 25:1, 25:3, 25:10, 25:11, 27:3, 35:18, 38:9, 40:1, 41:14, 61:14
cases [5] - 4:6, 21:6, 21:13, 31:4, 36:21
categories [4] - 55:8, 56:19, 56:20, 57:11
category [4] - 16:12, 54:7, 57:2, 57:17
caused [2] - 8:1, 10:14
Cayuga [3] - 37:1, 37:24, 38:5
centers [1] - 51:19
centrex [1] - 47:23
century [3] - 62:21, 62:22
certain [3] - 3:11, 41:24, 45:20
certainly [2] - 24:15, 54:22
chad [1] - 4:17
Chad [4] - 41:17, 41:19, 59:6, 59:16
Chairman [4] - 1:14, 3:19, 36:2, 41:20
CHAIRMAN [31] - 3:1, 3:14, 3:22, 4:17, 5:2, 5:5, 5:11, 6:19, 7:1, 18:17, 19:19, 25:22, 26:10, 31:3, 32:15, 34:20, 35:5, 39:12, 39:23, 40:9, 41:4, 49:18, 52:11, 53:18, 57:8, 59:2, 64:18, 65:4, 65:14, 65:18, 65:22
chairman [5] - 4:1, 6:4, 40:22, 52:19, 54:18
change [3] - 3:9, 19:4, 65:13
changes [2] - 3:7, 46:8
changing [1] - 14:11
charged [3] - 9:6, 12:19, 15:18
charges [12] - 8:6, 8:15, 8:16, 8:18, 8:19, 8:23, 11:6, 11:15, 14:23, 16:6, 18:8, 18:12
charitable [1] - 12:18
cheaper [1] - 39:16
Chief [1] - 7:16
children [1] - 62:6
choice [3] - 43:6, 43:21, 45:1
choices [1] - 58:22
choir [1] - 61:23
choosing [1] - 48:8
circumstances [1] - 44:8
cited [1] - 22:13
citizens [2] - 60:11, 60:20
City [5] - 1:15, 3:5, 25:23, 52:2, 65:15
city [1] - 58:1
civic [1] - 43:13
claims [1] - 43:11
clear [5] - 13:5, 19:3, 34:12, 45:3, 50:5

clearer [1] - 56:1
clearly [1] - 55:21
close [1] - 25:7
closely [1] - 64:9
coal [1] - 37:15
collaborations [1] - 61:11
colleagues [1] - 64:1
combined [1] - 13:15
comfortable [1] - 26:23
coming [3] - 27:8, 31:2, 31:4
commence [1] - 8:2
comment [11] - 19:7, 19:15, 20:15, 21:23, 25:11, 34:5, 34:23, 35:2, 48:21, 49:10, 58:14
Commentators [1] - 43:13
commenting [1] - 58:14
comments [19] - 10:21, 14:5, 15:3, 16:4, 17:3, 18:17, 22:10, 22:16, 25:19, 34:9, 34:20, 40:9, 43:11, 46:12, 49:11, 49:16, 49:20, 51:13, 53:20
COMMISSION [1] - 1:1
commission [28] - 4:18, 4:23, 7:13, 9:10, 9:21, 15:1, 19:8, 19:12, 34:2, 36:23, 37:6, 37:19, 38:21, 38:23, 41:15, 42:8, 42:15, 42:17, 45:24, 48:12, 48:15, 49:13, 58:8, 61:19, 62:9, 63:13, 63:18, 63:19
Commission [13] - 1:3, 2:3, 2:11, 2:16, 2:19, 3:3, 10:3, 20:18, 60:7, 60:13, 60:17, 60:18, 62:3
commission's [4] - 19:11, 25:19, 47:3, 63:22
Commission's [2] - 2:4, 2:14
Commissioner [14] - 3:4, 5:12, 18:18, 19:19, 22:9, 25:18, 26:19, 29:1, 32:24, 51:12, 52:13, 53:18, 55:3, 56:14
commissioner [3] - 52:11, 64:6, 65:5
COMMISSIONER [37] - 3:19, 4:1, 5:14, 6:4, 6:24, 18:19, 19:18, 19:20, 20:21, 21:22, 22:19, 24:3, 25:9, 25:24, 26:7, 27:9, 28:2, 29:7, 29:12, 31:22, 33:1, 34:4, 34:22, 40:4, 40:7, 40:11, 41:2, 51:13, 52:12, 53:21, 56:3, 57:9, 58:13, 63:7, 63:16, 63:24, 64:20
COMMISSIONERS [1] - 1:13
commissioners [6] - 3:17, 4:8, 7:18, 36:3, 41:21, 52:6
committee [1] - 61:3
communicating [1] - 51:2
Communication [1] - 43:12
communication [2] - 53:10, 53:15
communities [1] - 5:22
community [4] - 5:21, 55:22, 56:2, 57:15
companies [6] - 11:10, 14:12, 14:16, 22:21, 22:22
companies' [1] - 48:4
company [50] - 8:6, 8:11, 8:13, 8:15, 8:16, 8:18, 8:22, 8:24, 9:4, 10:17, 10:22, 11:15, 11:20, 11:23, 12:1, 14:23, 15:12, 16:11, 17:22, 18:9, 18:10, 19:2, 19:10, 20:9, 20:19, 21:14, 22:12, 27:11, 27:16, 27:21, 27:23, 29:24, 30:3, 31:8, 32:17, 34:5, 34:16, 45:13, 46:9, 51:4, 52:1, 52:15, 53:10, 53:15, 53:23, 55:12, 56:8, 57:12, 57:19, 58:14
company's [6] - 19:13, 19:15, 22:16, 29:4, 45:4, 57:24
compare [2] - 37:23, 38:17
compared [2] - 8:19, 37:16
comparison [1] - 13:23
compelling [1] - 43:19
competition [11] - 5:15, 6:1, 6:9, 42:13, 43:18, 47:16, 47:19, 49:5, 50:15, 57:14, 57:20
competitive [4] - 5:23, 42:19, 43:6, 48:19
competitively [2] - 43:24, 58:20
competitiveness [1] - 48:2
competitors [1] - 55:23
complaints [4] - 51:18, 51:20, 52:6, 56:22
complete [3] - 10:13, 31:18, 64:19
completely [2] - 6:22, 31:14
completes [1] - 65:8
complexity [2] - 10:15, 28:18
comply [2] - 4:20, 45:10
comport [1] - 5:1
compromised [1] - 45:8
concern [6] - 16:16, 29:12, 36:14, 46:3, 54:16, 56:2
concerned [3] - 15:19, 30:5, 55:9
concerns [4] - 36:13, 47:3, 48:1, 49:16
conclude [1] - 45:19
concludes [3] - 39:10, 43:15, 49:15
conditions [5] - 43:5, 46:2, 46:14, 48:13, 51:22
conduct [1] - 49:2
conducted [2] - 2:8, 22:4
conference [1] - 25:7
confidence [5] - 13:19, 13:20, 16:22, 24:5, 31:9
confirm [2] - 5:16, 6:13
confirmation [1] - 6:7
confirmed [1] - 64:4
confirming [1] - 4:23
conform [1] - 5:1
confused [1] - 60:3
consent [4] - 3:16, 3:18, 4:3, 7:4
consider [4] - 14:8, 15:13, 33:6, 41:15
consideration [2] - 39:17, 41:23
considered [1] - 14:24
considering [2] - 33:4, 55:15
considers [1] - 43:11
consist [1] - 43:7
consolidating [1] - 14:16
consulting [1] - 9:19
Consulting [4] - 8:4, 10:9, 11:9, 14:11
consumer [1] - 51:19
Consumer [1] - 52:5
consumers [1] - 61:9
contain [1] - 2:7
contained [1] - 2:18
contention [1] - 22:8
context [1] - 5:24
contexts [2] - 21:8, 21:20
continue [2] - 22:17, 52:5
continues [2] - 43:24, 45:4
continuing [1] - 11:16
contracts [3] - 5:6, 36:24, 37:3
contributions [1] - 12:18
control [2] - 8:5, 57:24
controls [1] - 10:23
convey [1] - 26:23
cooperating [1] - 27:11
copper [2] - 52:3, 52:16
copy [1] - 62:10
core [28] - 42:23, 43:3, 43:7, 44:4, 44:15, 44:16, 44:20, 44:23, 45:11, 45:18, 46:2, 46:13, 46:17, 46:22, 47:6, 47:9, 47:12, 47:18, 47:24, 49:20, 49:21, 50:4, 50:6, 51:5, 54:2, 54:7
Corporation [1] - 3:12
Correct [1] - 5:10
correct [3] - 25:9, 25:12, 39:22
correcting [1] - 17:4
correction [1] - 39:2
cost [7] - 7:14, 8:11, 12:11, 12:14, 12:16, 15:5, 15:9
costs [14] - 8:24, 9:6, 12:19, 13:6, 13:7, 15:18, 17:17, 31:8, 33:9, 34:1, 37:23, 37:24, 38:7, 45:14
Counsel [4] - 35:23, 60:15, 60:16, 60:17
countless [1] - 61:16
couple [3] - 30:17, 31:4, 49:19
course [3] - 14:9, 29:8, 44:11
credit [1] - 46:22
crispness [1] - 31:1
criteria [1] - 47:17
criticism [1] - 27:5
cuff [1] - 6:20
cup [1] - 61:24
current [2] - 14:22, 18:13
customer [7] - 38:18, 44:16, 45:9, 46:22, 47:5, 51:15, 51:18
customers [40] - 6:11, 10:5, 10:7, 42:13, 42:24, 43:4, 43:6, 43:7, 43:9, 43:17, 43:22, 44:4, 44:15, 44:21, 44:24, 45:1, 45:7, 45:12, 45:18, 46:2, 46:13, 46:17, 47:6, 47:12, 48:7, 48:9, 48:17, 49:21, 49:22, 50:1, 50:4, 50:6, 50:7, 50:15, 50:21, 50:22, 51:5, 52:10, 58:24

D

d/b/a [1] - 3:12
damaged [1] - 52:3
danger [1] - 54:1
data [10] - 27:24, 44:3, 44:20, 47:2, 48:7, 50:12, 51:11, 56:20, 57:7, 57:13
date [4] - 34:6, 38:21, 49:8, 62:10
days [7] - 38:9, 38:11, 38:15, 38:21, 39:7, 49:8, 54:20
deal [2] - 17:11, 31:9
dealing [6] - 20:5, 24:9, 29:14, 32:6, 32:13, 41:22
dealt [3] - 14:24, 32:11
December [2] - 8:2, 42:15
decided [1] - 9:22

decision [7] - 2:11, 10:2, 15:1, 18:23, 20:17, 23:10, 34:24
decisions [1] - 31:13
Decisions [1] - 2:15
decisively [1] - 31:1
declining [1] - 43:18
dedicated [1] - 61:12
dedication [1] - 62:23
defend [1] - 31:3
defense [1] - 29:23
deficient [1] - 18:9
define [2] - 8:10, 55:21
defined [3] - 55:1, 55:22, 56:13
defines [1] - 43:3
defining [1] - 55:7
definition [3] - 54:19, 56:1, 58:15
definitional [1] - 55:14
definitions [3] - 54:22, 55:8, 56:19
definitive [1] - 32:5
degree [1] - 60:22
delay [1] - 29:9
Delivery [4] - 9:15, 9:16, 18:3, 18:4
delve [2] - 24:4, 57:7
demonstrate [1] - 15:17
demonstrates [1] - 44:18
Department [2] - 60:16, 60:19
department [2] - 63:6, 63:13
department's [2] - 61:3, 61:23
DEPUTY [3] - 65:8, 65:17, 65:20
Deputy [2] - 35:21, 60:16
describe [2] - 6:21, 54:8
described [7] - 4:8, 27:10, 28:2, 41:5, 50:13, 59:6, 59:16
description [1] - 4:6
desire [1] - 25:20
desperately [1] - 52:21
detail [2] - 33:9, 33:17
deteriorate [1] - 50:4
deterioration [1] - 44:18
determination [3] - 2:13, 18:11, 20:23
determine [2] - 9:12, 32:2
determined [2] - 12:8, 13:12
development [1] - 61:13
dialogue [3] - 49:2, 49:4, 53:12
different [7] - 9:19, 19:12, 22:14, 34:3, 53:1, 57:4, 59:3
diluted [1] - 54:2
diminished [2] - 43:22, 45:8
direct [2] - 19:5, 49:1
directed [2] - 42:22, 48:11
directing [2] - 19:2, 59:5
direction [2] - 12:11, 15:9
directly [1] - 58:18
Director [2] - 35:21, 41:17
director's [1] - 61:24
directs [2] - 38:6, 62:8
disabled [1] - 43:6
disagreed [3] - 14:20, 15:4, 15:8
disagreement [5] - 16:3, 17:9, 20:9, 21:16, 21:24
disagreements [1] - 20:11
disallowing [1] - 15:20
disappointing [1] - 30:14
discern [1] - 56:8
discipline [1] - 23:9
disconcerted [1] - 59:24
discovered [2] - 10:5, 50:11
discovery [3] - 27:20, 27:21, 29:18
discuss [1] - 56:19
discussed [2] - 2:12, 48:23
discussing [1] - 36:4
discussion [6] - 2:8, 7:12, 19:21, 20:15, 35:18, 41:13
discussions [1] - 54:17
dispute [3] - 30:16, 61:7
disputed [1] - 24:17
disrepair [1] - 29:3
dissatisfied [1] - 19:6
divert [1] - 51:4
diverted [1] - 54:2
Doctorate [1] - 60:24
document [1] - 61:15
documentation [3] - 12:24, 15:14, 15:15
documented [1] - 15:22
documents [2] - 61:17, 61:20
dollars [5] - 12:5, 16:15, 28:21, 30:18, 44:14
done [7] - 5:22, 13:9, 22:14, 28:8, 52:23, 55:14, 63:6
donnybrook [1] - 18:20
door [2] - 53:14, 63:11
down [4] - 29:6, 34:23, 57:7, 57:10
draft [8] - 7:22, 17:13, 38:6, 38:10, 39:2, 42:2, 43:11, 43:15
drag [1] - 64:3
draw [1] - 58:23
drawn [1] - 16:20
due [2] - 25:18, 45:8
Dunkirk [3] - 37:1, 37:23, 38:4
duration [2] - 30:13, 37:4
during [5] - 9:1, 11:20, 17:6, 52:15, 56:7

E

early [1] - 54:20
earnings [2] - 18:7, 18:9
economic [1] - 53:4
economical [1] - 23:20
economics [1] - 60:23
economy [2] - 39:4
effect [1] - 15:10
efficient [2] - 23:20, 52:24
effort [2] - 28:23, 52:1
efforts [2] - 42:23, 54:2
eight [1] - 43:8
either [2] - 36:15, 56:13
elaborate [1] - 29:24
elapsed [1] - 46:5
elderly [1] - 43:5
electric [13] - 8:3, 8:7, 8:14, 8:18, 9:22, 10:1, 10:4, 10:6, 11:13, 13:22, 14:21, 18:2, 18:13
Electric [3] - 9:14, 35:22, 60:14
electronic [2] - 61:17, 61:19
element [1] - 28:1
elsewhere [1] - 24:6
embark [1] - 26:14
embarrassing [1] - 30:14
embracing [1] - 30:6
emphasize [1] - 39:12
Empire [1] - 2:5
employed [2] - 25:5, 53:7
employee [1] - 9:5
Employees [1] - 61:3
employees [5] - 9:5, 55:2, 57:1, 61:4, 61:6
encompass [1] - 12:2
encourage [1] - 46:8
end [7] - 5:17, 27:22, 28:9, 28:11, 33:20, 49:2, 60:9
endorse [1] - 26:21
Energy [5] - 9:15, 9:16, 18:3, 18:4, 38:2
energy [1] - 22:22
enforce [1] - 42:9
enforceable [1] - 54:7
enhance [1] - 49:2
enhancement [1] - 48:23
ensure [1] - 61:16
ensuring [1] - 42:12
enter [2] - 20:14, 60:8
entered [1] - 62:9
Enterprise [1] - 56:14
enterprise [1] - 58:23
enterprises [1] - 55:5
entertain [1] - 49:16
entertained [1] - 61:22
enthusiasm [1] - 61:2
enthusiastically [1] - 61:21
entities [1] - 21:6
environment [1] - 23:22
Environment [1] - 60:14
environmental [1] - 38:18
envision [1] - 58:11
error [1] - 15:9
errors [5] - 12:9, 12:11, 13:9, 15:4
especially [2] - 20:19, 51:9
essentially [3] - 4:23, 42:7, 45:13
established [3] - 4:21, 9:10, 10:3
establishing [3] - 8:9, 17:18, 58:19
estimate [11] - 13:14, 13:15, 16:7, 16:14, 16:17, 17:2, 17:10, 18:2, 18:11, 38:7
estimated [3] - 13:23, 17:20, 18:6
estimates [3] - 13:18, 16:22, 17:23
etc [1] - 59:6
Ethics [1] - 60:18
evaluation [1] - 9:20
evaluations [2] - 38:20, 40:20
event [2] - 29:5, 46:9
examination [3] - 4:9, 11:19, 37:13
examine [8] - 6:8, 17:19, 17:22, 18:11, 23:13, 33:9, 37:19, 48:2
examined [3] - 8:15, 12:9, 23:18
examining [3] - 21:11, 23:15, 35:19
example [3] - 11:1, 12:17, 56:21
except [1] - 2:19
excluding [1] - 47:17
exclusive [2] - 5:20, 6:3
executive [1] - 8:24
exercise [1] - 26:15
exercised [1] - 5:17
exist [2] - 48:20, 51:9
existing [2] - 42:21, 46:3
exists [1] - 47:16
expanding [1] - 44:23
expatriate [2] - 8:24, 9:5
expect [2] - 24:11
expectation [1] - 23:24
expected [5] - 10:11, 27:15, 28:9, 37:10, 42:15
expedite [1] - 39:6
expedition [1] - 31:20
expenditure [1] - 15:16
expense [1] - 16:12
expenses [2] - 8:24, 9:5

experience [1] - 21:9
experienced [2] - 47:5, 47:12
experiencing [1] - 48:17
explain [2] - 20:4, 33:6
explained [1] - 8:17
explanation [1] - 33:16
explore [1] - 37:7
explored [1] - 24:24
expresses [1] - 62:3
Expressions [1] - 2:12
extend [1] - 55:16
extends [1] - 62:5
extent [2] - 20:12, 34:18
external [1] - 32:3
extra [1] - 28:24
extrapolate [1] - 22:4
extrapolated [3] - 16:5, 16:10, 16:19
extrapolation [7] - 12:8, 13:11, 17:5, 22:2, 31:6, 31:10, 51:17
extremely [2] - 32:7, 53:11
eye [1] - 60:1
eyes [1] - 50:6

F

face [1] - 43:17
facilitate [1] - 38:14
facilitation [1] - 61:7
facility [1] - 39:18
fact [9] - 15:13, 16:23, 18:5, 20:10, 20:11, 23:4, 27:16, 43:23, 47:10
fair [2] - 6:23, 20:13
fairness [1] - 24:18
faithful [2] - 62:1, 62:4
familiar [1] - 21:7
family [1] - 64:15
fan [1] - 62:1
far [3] - 26:1, 32:10, 48:8
fashion [1] - 23:20
fast [1] - 57:21
faster [1] - 46:8
favor [7] - 3:23, 7:3, 35:8, 41:5, 59:7, 59:17, 62:12
February [2] - 65:12, 65:16
FERC [1] - 12:15
few [2] - 51:13, 63:8
fiber [1] - 52:3
fifth [1] - 29:20
file [7] - 17:14, 19:2, 19:4, 19:5, 38:8, 38:19, 48:12
filed [6] - 2:16, 8:13, 8:14, 14:5, 34:8, 42:3
files [1] - 63:22
filing [2] - 9:2, 52:8
final [9] - 2:13, 17:7, 24:19, 31:13, 32:22, 34:1, 34:24, 41:13
finalize [1] - 32:21
finally [5] - 11:5, 12:22, 16:16, 16:21, 49:1
Finance [1] - 7:16
findings [3] - 20:6, 20:24, 49:12
FIOS [1] - 52:17
first [5] - 7:11, 17:13, 43:19, 46:18, 49:20
five [7] - 9:19, 12:15, 14:14, 31:2, 33:4, 60:5, 62:6
fix [1] - 51:22
Floor [2] - 1:8, 2:5
focus [3] - 24:16, 42:23, 50:1
focused [1] - 49:2
folks [1] - 6:19
following [1] - 49:11
follows [1] - 60:9
footprint [1] - 45:7
Force [1] - 38:2
force [1] - 45:13
forgot [1] - 33:2
form [2] - 61:17, 61:18
formal [3] - 2:10, 27:5, 40:21
forth [4] - 2:14, 6:9, 29:19, 55:2
forward [13] - 17:12, 18:20, 20:1, 31:13, 32:2, 32:8, 32:19, 33:11, 52:8, 53:9, 55:15, 57:13, 58:11
four [2] - 13:17, 37:9
frame [1] - 54:11
franchise [4] - 4:15, 5:17, 5:23, 58:1
franchisee [1] - 6:6
franchises [6] - 4:19, 4:22, 4:24, 5:7, 5:20, 6:2
frankly [1] - 30:13
friendly [1] - 64:10
friendships [1] - 64:11
front [2] - 38:6, 65:6
full [2] - 45:11, 46:22
fully [1] - 24:24
future [1] - 35:17

G

gaining [1] - 48:5
gap [1] - 37:18
GARRY [1] - 1:14
Gas [2] - 9:15, 35:22
gas [2] - 9:2, 18:6
gather [4] - 52:20, 54:6, 55:20, 57:19
gear [1] - 27:16
general [2] - 2:9, 48:3
General [8] - 9:3, 29:17, 42:3, 45:13, 54:21, 56:14, 58:17, 59:15
General's [1] - 43:10
generally [2] - 23:3, 47:4
generating [1] - 39:18
generation [3] - 36:19, 37:24, 38:12
Generation [1] - 60:14
generator [2] - 36:5, 36:17
generators [5] - 36:6, 36:13, 36:22, 38:14, 38:15
geographic [1] - 58:1
Georgetown [1] - 60:23
girl [1] - 65:1
given [4] - 21:15, 39:18, 44:24, 51:21
golf [1] - 61:24
government [2] - 4:20, 22:10
grade [2] - 47:22, 47:24
granting [1] - 5:22
grasp [1] - 32:4
great [5] - 20:12, 22:19, 31:9, 34:17, 61:1
greater [4] - 12:5, 44:5, 44:6, 48:8
greeting [1] - 64:3
GREGG [1] - 1:16
Grid [20] - 7:14, 9:12, 10:15, 10:19, 10:20, 11:11, 14:4, 14:7, 14:13, 15:4, 16:4, 17:3, 17:14, 22:10, 27:6, 33:3, 36:24, 37:6, 37:22, 38:7
Grid's [1] - 11:10
Grid/Overland [1] - 15:13
Grisaro [1] - 35:22
group [2] - 50:10, 51:10
groups [1] - 22:2
guess [3] - 22:15, 32:15, 53:12
guessing [2] - 57:8, 57:10
guidance [2] - 27:7, 59:1
guidelines [1] - 47:22

H

half [1] - 63:10
hand [1] - 64:5
happy [2] - 49:16, 49:21
hard [3] - 35:16, 51:11, 61:18
harder [1] - 51:14
Harris [3] - 19:19, 22:9, 32:24
HARRIS [14] - 1:15, 3:19, 19:20, 20:21, 21:22, 22:19, 24:3, 33:1, 34:4, 40:4, 40:7, 56:3, 57:9, 63:7
Harris' [1] - 25:19
havoc [1] - 52:14
hear [2] - 30:1, 30:5
heard [2] - 29:13, 55:5
hearing [6] - 7:9, 29:22, 41:10, 59:12, 59:21, 62:17
heart [1] - 64:8
heavy [1] - 54:9
held [3] - 2:3, 53:23, 65:12
helped [1] - 61:6
helpful [3] - 56:20, 63:11, 63:12
herself [1] - 61:12
high [1] - 14:2
higher [1] - 13:24
highest [1] - 45:6
Highway [1] - 38:2
historic [1] - 11:14
history [1] - 21:8
hit [1] - 31:7
hold [1] - 54:6
holds [1] - 60:22
holiday [1] - 61:23
honestly [1] - 30:1
hope [4] - 24:16, 24:17, 53:9, 65:2
hoping [1] - 51:23
hour [4] - 44:6, 46:2, 46:5, 46:10
hours [5] - 44:5, 46:18, 46:19, 47:8, 61:16
Hoyas [1] - 62:1
huge [1] - 52:1
HUME [7] - 4:18, 5:4, 5:10, 5:19, 41:20, 55:18, 58:4
Hume [1] - 41:17
hundred [2] - 30:17, 44:13
Hurricane [1] - 56:7
husband [1] - 62:5

I

IBM [1] - 58:17
idea [1] - 54:4
identified [2] - 37:21, 49:22
identify [1] - 48:15
immediate [1] - 38:3
impact [2] - 39:3, 42:14
impacts [4] - 38:19, 39:14, 40:23, 41:1
implement [11] - 14:7, 19:10, 19:11, 32:18, 33:4, 33:11, 33:17, 34:13, 34:18, 37:11, 48:16
implementation [8] - 14:14, 17:14, 19:2, 19:13, 19:15, 35:2, 35:6, 41:17
implemented [1] - 34:14
implementing [3] - 14:8, 33:4, 33:7
implications [1] - 36:12
importance [1] - 40:15
important [12] - 13:3, 15:7, 28:19, 30:24, 31:24, 32:7, 39:13, 41:3, 52:15, 52:19, 53:5, 53:11
impossible [1] - 56:8
imprecise [1] - 17:2
imprimatur [1] - 6:6
improve [3] - 10:22, 17:16, 41:24
improved [2] - 44:22, 61:13
improvement [2] - 42:5, 45:21

inaccuracies [1] - 2:7
incentive [1] - 46:6
inception [1] - 47:12
incidents [1] - 44:10
inclined [1] - 27:2
include [3] - 2:8, 11:14, 44:23
included [3] - 11:13, 14:22, 43:12
includes [2] - 9:14, 47:22
including [6] - 17:22, 24:22, 44:7, 51:19, 61:7, 61:13
increase [2] - 46:14, 51:17
increased [1] - 46:17
increases [2] - 8:17, 8:18
increasing [4] - 43:18, 57:21, 57:22
increasingly [2] - 42:19, 45:14
incur [1] - 45:14
indeed [1] - 48:17
Independent [1] - 36:10
indicate [1] - 44:20
indicated [2] - 22:10, 29:3
indicates [3] - 44:3, 47:3, 48:7
indicators [1] - 8:1
indisputably [1] - 55:5
individual [3] - 11:3, 11:6, 16:11
industries [1] - 23:22
industry [3] - 22:3, 23:1, 49:5
ineffective [2] - 8:5, 51:21
inferential [1] - 23:21
inform [2] - 21:3, 21:17
informal [3] - 2:11, 29:13, 40:20
information [10] - 2:10, 22:20, 22:23, 24:1, 26:22, 51:3, 52:20, 54:6, 55:20, 57:20
initial [2] - 46:2, 46:10
initiated [2] - 9:9, 10:10
initiating [2] - 26:3, 29:21
input [2] - 33:20, 36:9
insist [1] - 19:9
instead [2] - 28:10, 65:21
institute [1] - 37:19
instructed [1] - 30:9
insufficient [4] - 12:24, 16:9, 46:5, 48:19
intended [2] - 2:9, 21:19
intent [2] - 55:19
intents [1] - 21:19
interconnecting [1] - 36:11
interest [2] - 37:8, 54:6
interested [1] - 49:9
interject [1] - 21:2
international [1] - 60:23
interruption [2] - 46:20, 46:23
intervals [2] - 16:22, 51:21
intervening [1] - 9:21
invaluable [1] - 63:20
investigate [3] - 7:13, 9:11, 19:24
investigating [1] - 20:2
investigation [6] - 9:8, 9:9, 10:5, 10:9, 11:19, 59:16
investments [1] - 45:5
invitation [1] - 50:3
invite [1] - 58:13
invited [1] - 49:9
involved [2] - 14:15, 20:11
Island [4] - 3:12, 9:16, 18:4
issuance [5] - 38:11, 38:16, 39:8, 46:11, 49:8
issue [8] - 20:8, 24:23, 25:8, 28:13, 30:24, 38:11, 51:24
issued [4] - 9:18, 10:2, 10:12, 10:20
issues [4] - 24:9, 24:16, 36:5, 45:21
item [10] - 3:9, 3:20, 4:3, 7:12, 35:18, 39:2, 42:1, 45:21
items [10] - 3:18, 4:4, 21:12, 23:13, 41:13, 41:14, 41:22, 49:7, 49:15, 59:3
itself [1] - 11:11

J

J.B [1] - 62:6
Jackie [11] - 60:2, 60:8, 60:10, 62:5, 62:11, 62:18, 63:9, 63:17, 64:1, 64:13, 64:22
Jaclyn [2] - 60:10, 62:4
JAMES [1] - 1:15
JANUARY [1] - 1:6
January [4] - 2:4, 3:2, 9:23, 10:2
jeopardized [1] - 50:24
job [3] - 32:9, 53:17, 54:10
Joe [5] - 7:15, 7:17, 19:20, 29:7, 35:15
join [1] - 64:1
joining [1] - 3:4
Joint [1] - 43:13
journalism [1] - 29:18
Judge [1] - 60:15
judge [3] - 25:10, 25:17, 27:6
JUDGE [1] - 25:12
judges [1] - 25:4
judgment [4] - 4:10, 4:15, 5:15, 6:1
judgmental [1] - 23:8
Juris [1] - 60:24
jurisdiction [1] - 19:4

K

KEDLI [1] - 18:3
KEDNY [1] - 18:2
keep [6] - 36:21, 37:2, 50:5, 52:6, 53:7, 56:5
keeping [1] - 36:16
key [2] - 31:5, 44:17
KeySpan [4] - 9:15, 18:3, 18:4
kicked [1] - 9:7
kind [5] - 5:9, 6:19, 6:21, 40:16, 51:10
kinds [1] - 25:5
knowledge [2] - 21:12, 21:18
known [1] - 42:5

L

lack [1] - 10:16
lady [1] - 64:3
large [1] - 23:13
larger [1] - 16:19
Larocca [3] - 3:4, 5:13, 56:14
LAROCCA [13] - 1:15, 4:1, 5:14, 6:4, 6:24, 25:24, 26:7, 27:9, 28:2, 29:7, 29:12, 53:21, 64:20
last [6] - 14:19, 14:21, 36:4, 36:20, 54:17, 57:15
lastly [1] - 24:7
launch [1] - 30:19
Law [3] - 3:10, 60:15, 60:24
law [4] - 5:20, 25:4, 25:10, 27:6
lead [1] - 61:18
learn [2] - 50:20, 56:7
least [1] - 40:15
leave [1] - 4:13
legal [3] - 18:24, 19:3, 20:8
legitimate [1] - 15:15
less [1] - 13:22
letting [1] - 53:10
level [8] - 4:20, 4:24, 8:9, 13:20, 16:8, 38:13, 45:6, 58:5
levels [5] - 13:24, 22:11, 22:15, 45:5, 45:12
Liberty [3] - 11:9, 14:11, 22:24
LIEBSCHUTZ [1] - 25:12
lieu [1] - 44:12
life [1] - 39:24
lifeline [1] - 43:4
light [2] - 40:22, 48:1
limited [2] - 6:7, 42:24
limits [1] - 13:19
line [10] - 9:6, 12:20, 15:18, 16:1, 39:6, 52:16, 58:23, 58:24
lines [6] - 45:23, 47:5, 47:14, 47:18, 47:23, 51:20
linger [1] - 31:16
litigated [1] - 9:24
litigation [3] - 24:21, 24:22, 25:15
Liz [3] - 35:22, 39:10, 41:12
lobbying [2] - 9:6, 12:18
local [8] - 4:19, 4:24, 5:3, 5:21, 6:6, 36:11, 39:4, 40:5
Lochner [1] - 7:16
LOCHNER [9] - 7:18, 20:7, 21:1, 23:2, 27:13, 28:4, 29:11, 33:8, 34:7
longstanding [1] - 42:18
look [10] - 18:20, 33:15, 39:15, 39:20, 40:1, 40:23, 51:14, 52:8, 56:4, 57:14
looked [3] - 11:23, 33:2, 41:1
looking [4] - 22:20, 24:4, 40:15, 58:2
lose [1] - 43:24
loyal [1] - 62:1
luck [1] - 35:16
lump [1] - 57:2
LYNCH [4] - 3:8, 65:8, 65:17, 65:20

M

macro [1] - 8:21
Madam [2] - 3:6, 3:14
main [1] - 42:11
maintain [1] - 45:5
maintained [1] - 49:23
maintaining [1] - 51:5
major [2] - 11:18, 16:3
makers [1] - 21:4
mall [1] - 50:16
manage [1] - 8:12
management [5] - 8:3, 8:5, 8:8, 61:14, 61:15
managing [1] - 35:23
manner [2] - 15:24, 52:24
mapped [1] - 24:15
March [4] - 10:8, 28:6, 62:1
Mark [1] - 50:13
market [9] - 38:13, 42:20, 43:23, 44:1, 47:17, 48:2, 48:4, 51:15, 58:10
Massachusetts [2] - 9:2, 9:3
material [2] - 13:16, 44:18
matter [6] - 2:11, 26:2, 29:14, 30:14, 31:2, 35:19
matters [4] - 30:3, 32:1, 32:3, 32:10
Matthew [1] - 62:7

MAUREEN [1] - 1:15
McGowan [1] - 18:24
MCGOWAN [5] - 19:8, 24:14, 26:4, 26:13, 33:24
mean [7] - 24:8, 54:23, 55:11, 55:13, 56:24, 63:2
meaning [1] - 13:18
meaningful [2] - 6:10
means [1] - 33:7
measure [1] - 46:4
measurement [3] - 18:8, 44:10, 47:21
measuring [1] - 44:17
mediation [2] - 61:8, 61:10
medical [1] - 43:5
medium [1] - 37:8
meet [2] - 25:14, 37:21
Meeting [2] - 1:3, 65:24
meeting [4] - 2:2, 2:8, 44:5, 65:23
megawatts [1] - 36:19
member [1] - 61:22
members [2] - 21:11, 43:14
memo [1] - 27:2
memorandum [1] - 27:8
mentioned [2] - 25:13, 54:18
methodologies [1] - 28:21
methodology [1] - 11:2
methods [2] - 10:23, 22:17
metric [4] - 44:17, 46:3, 46:4, 46:10
metrics [5] - 42:9, 42:21, 45:11, 51:4, 53:24
Michael [1] - 62:6
Mickey [1] - 62:6
might [6] - 4:2, 26:11, 54:8, 55:10, 57:18, 57:21
migration [3] - 45:3, 48:7, 61:16
migrations [1] - 45:9
million [11] - 8:21, 8:23, 10:3, 11:14, 12:5, 13:14, 13:15, 14:22, 16:7, 16:24, 18:12
millions [1] - 30:18
mind [1] - 54:11
minimal [1] - 6:14
minimum [2] - 4:21, 27:1
ministerial [1] - 4:9
minor [1] - 39:2
mirror [1] - 47:11
misallocation [1] - 8:21
miss [2] - 44:14, 64:9
missed [3] - 30:24, 40:17, 63:14
misses [1] - 46:9
misunderstood [1] - 29:10
modification [1] - 42:4
modifications [3] - 33:18, 45:22, 46:12
modified [1] - 33:19
Mohawk [5] - 8:7, 8:14, 9:14, 13:21, 14:20
Mohawk's [1] - 8:3
mom [3] - 55:1, 56:9, 57:2
moment [1] - 63:11
monetary [1] - 20:17
monitor [1] - 52:5
monitoring [2] - 17:17, 58:18
month's [1] - 46:22
monthly [4] - 11:7, 23:16, 46:18, 46:19
months [1] - 44:11
months' [2] - 37:4
morning [8] - 3:7, 7:17, 7:18, 36:2, 41:19, 41:20, 59:24, 60:3
most [6] - 4:16, 6:13, 43:17, 45:18, 49:22, 50:2
mothballed [2] - 36:7, 36:20
mothballing [1] - 36:8
motion [2] - 7:13, 41:15
Motors [3] - 54:21, 56:14, 58:17
move [9] - 3:16, 7:11, 30:20, 31:16, 32:2, 32:19, 33:11, 41:3, 53:9
movement [1] - 61:14
moving [4] - 32:8, 35:16, 52:17, 62:21
MR [32] - 4:18, 5:4, 5:10, 5:19, 7:18, 19:8, 20:7, 21:1, 21:2, 22:9, 23:2, 23:24, 24:14, 24:20, 26:4, 26:13, 26:19, 27:13, 28:4, 29:1, 29:11, 33:8, 33:24, 34:7, 36:2, 39:22, 40:3, 40:6, 40:19, 41:20, 55:18, 58:4
multi [1] - 30:18
multi-millions [1] - 30:18
municipality [1] - 5:3

N

narrative [3] - 27:9, 29:8, 30:1
narrow [1] - 57:10
National [22] - 7:13, 9:11, 10:15, 10:19, 10:20, 11:10, 11:11, 14:4, 14:7, 14:13, 15:3, 15:12, 16:4, 17:3, 17:14, 22:10, 27:6, 33:3, 36:24, 37:6, 37:22, 38:7
nature [3] - 12:19, 49:3, 57:12
neat [1] - 30:21
necessarily [1] - 2:13
necessary [10] - 18:1, 18:14, 24:21, 25:5, 35:1, 37:3, 45:6, 53:6, 54:5, 54:15
need [31] - 19:22, 21:10, 21:16, 22:6, 24:17, 26:15, 29:24, 30:10, 31:12, 31:15, 31:17, 32:11, 36:17, 36:21, 37:9, 38:14, 41:1, 43:17, 45:18, 45:20, 49:22, 50:2, 51:3, 52:21, 53:11, 55:14, 55:16, 56:4, 57:18, 58:17, 59:2
needed [5] - 9:13, 17:19, 20:1, 20:2, 20:5
needing [2] - 56:6, 58:6
needs [13] - 20:12, 29:24, 33:17, 36:6, 36:15, 36:22, 37:3, 37:12, 37:21, 39:14, 39:17, 42:19, 43:4
neglected [1] - 54:3
negotiated [1] - 4:24
negotiation [1] - 25:15
nervous [1] - 31:7
network [2] - 44:17, 45:15
networks [1] - 45:4
never [2] - 50:3, 64:13
NEW [1] - 1:1
new [11] - 17:18, 19:22, 20:3, 20:4, 21:23, 24:2, 24:8, 26:3, 35:7, 39:19, 61:18
New [32] - 1:9, 1:15, 2:3, 2:5, 3:2, 3:5, 5:22, 9:13, 9:15, 10:23, 11:5, 11:21, 13:12, 17:5, 18:3, 25:22, 36:10, 38:2, 41:16, 42:3, 42:4, 52:2, 54:24, 58:10, 60:7, 60:11, 60:13, 62:2, 64:15, 64:16, 64:21, 65:15
next [8] - 13:10, 14:3, 15:2, 17:7, 31:5, 39:15, 52:4, 65:11
Niagara [6] - 8:3, 8:6, 8:14, 9:14, 13:21, 14:20
NIMO [10] - 8:18, 9:22, 10:1, 10:4, 10:6, 11:13, 14:21, 18:2, 18:6, 18:13
nine [2] - 14:2, 37:4
non [16] - 5:20, 6:3, 11:15, 14:23, 18:12, 44:16, 44:20, 44:23, 45:11, 47:6, 47:12, 47:18, 50:4, 50:6, 54:7, 56:22
non-core [10] - 44:16, 44:20, 44:23, 45:11, 47:6, 47:12, 47:18, 50:4, 50:6, 54:7
non-exclusive [2] - 5:20, 6:3
non-recurring [3] - 11:15, 14:23, 18:12
non-residential [1] - 56:22
none [4] - 7:9, 41:10, 59:21, 62:17
Northstar [1] - 8:4
note [3] - 13:22, 15:7, 32:15
noted [2] - 7:5, 45:24
notes [1] - 33:2
nothing [1] - 5:21
notice [17] - 4:12, 14:9, 19:6, 19:14, 25:11, 29:15, 29:16, 34:23, 45:22, 46:11, 48:10, 48:21, 49:1, 49:9, 55:19, 55:20, 59:4
notion [1] - 53:22
November [10] - 9:8, 9:10, 9:17, 10:12, 14:5, 14:18, 19:23, 28:6, 34:9, 47:3
number [6] - 26:24, 32:22, 34:13, 36:20, 51:18, 55:2
numbers [2] - 40:22, 55:13
numerous [1] - 61:4
NYSEG [4] - 37:1, 37:7, 37:22, 38:7

O

observation [1] - 6:5
observed [1] - 54:21
obsolete [1] - 45:15
obstacles [2] - 57:22, 58:2
obviously [1] - 3:4
occur [2] - 25:16, 29:6
occurred [1] - 14:18
October [2] - 10:20, 34:8
OF [1] - 1:1
offer [2] - 27:1, 60:6
offered [2] - 26:24, 27:5
offering [1] - 6:16
office [2] - 3:5, 56:22
Office [5] - 7:16, 35:22, 35:23, 41:18, 52:4
Officer [1] - 60:18
Offices [1] - 2:4
old [2] - 52:16, 62:22
once [7] - 25:2, 46:4, 54:20, 59:16, 62:18, 62:20, 63:5
one [24] - 3:8, 4:8, 4:12, 5:2, 9:24, 13:21, 13:23, 15:9, 21:22, 27:10, 28:1, 28:3, 28:4, 29:9, 31:5, 32:16, 39:1, 39:9, 40:21, 53:8, 53:21, 58:24, 59:23, 65:9
ongoing [1] - 25:21
open [2] - 36:17, 36:22
opens [1] - 53:14
operate [2] - 45:14, 53:6
operating [1] - 12:17
operations [2] - 8:4, 29:4

Operator [1] - 36:10
opinions [1] - 2:12
opportunities [3] - 30:1, 40:17, 44:10
opportunity [11] - 17:22, 20:22, 24:21, 31:1, 33:14, 34:5, 35:1, 52:18, 52:23, 52:24, 53:15
oppose [1] - 30:23
opposed [7] - 7:7, 35:11, 39:4, 41:8, 59:10, 59:19, 62:15
opposition [2] - 35:13, 59:12
option [1] - 40:16
options [2] - 43:1, 53:1
Order [1] - 2:15
order [26] - 3:3, 7:23, 12:24, 17:13, 17:14, 19:12, 30:23, 33:21, 34:2, 35:3, 38:6, 38:9, 38:10, 38:12, 38:16, 38:21, 39:2, 39:8, 40:1, 42:2, 43:11, 43:15, 43:23, 45:19, 46:8, 59:14
ordering [1] - 32:17
organizations [1] - 43:14
originally [2] - 50:5, 65:14
otherwise [1] - 42:5
ourselves [1] - 58:6
outages [1] - 51:20
outcome [2] - 19:12, 30:8
outdated [1] - 61:14
outside [2] - 23:23, 63:21
overall [3] - 14:1, 16:24, 29:12
overcharge [2] - 16:14, 16:18
overcharged [2] - 13:13, 17:6
overcharges [7] - 10:6, 13:23, 14:1, 16:23, 17:10, 18:2, 18:5
Overland [26] - 10:8, 10:20, 11:12, 11:17, 11:19, 12:4, 13:4, 13:12, 14:14, 15:19, 17:15, 17:20, 19:17, 19:23, 21:3, 21:8, 21:14, 22:1, 22:4, 22:24, 26:21, 27:21, 30:7, 32:9, 34:7
Overland's [3] - 10:19, 16:5, 18:11
overstated [1] - 16:18
own [6] - 14:10, 21:11, 29:18, 34:12, 37:11, 37:24
owners [2] - 37:1, 38:12

P

p.m [1] - 65:24
panoply [1] - 45:11
paper [2] - 2:16, 61:17
parameter [1] - 25:3
parameters [1] - 46:21
parlor [1] - 58:24
part [5] - 2:10, 8:15, 33:3, 50:19, 58:2
participant [1] - 61:23
particular [3] - 22:5, 22:22, 24:9
particularly [5] - 8:18, 18:1, 23:11, 52:1, 52:21
parties [13] - 17:21, 18:11, 20:14, 20:18, 20:22, 24:24, 25:7, 25:14, 25:17, 35:1, 43:12, 49:9, 58:14
parts [2] - 32:23, 35:6
party [1] - 27:20
past [5] - 22:15, 40:14, 40:15, 40:18, 63:10
PATRICIA [1] - 1:14
payments [2] - 38:13, 44:13
payphone [1] - 47:23
PBX [1] - 47:24
penalties [3] - 31:8, 42:9, 58:19
penalty [1] - 44:12
people [6] - 53:7, 53:16, 63:20, 64:8, 64:13, 64:14
per [1] - 44:14
percent [6] - 13:19, 13:23, 14:2, 16:24, 43:8, 44:7
percentage [2] - 14:1, 47:4
perform [2] - 48:11, 59:5
performance [7] - 41:24, 44:16, 46:1, 47:7, 47:8, 47:10, 47:11
performed [4] - 11:10, 13:12, 28:12, 44:4
performing [2] - 6:10, 23:4
perhaps [3] - 30:22, 34:24, 55:1
period [4] - 9:21, 11:21, 23:14, 46:10
periods [3] - 15:5, 17:6, 44:7
peripheral [1] - 60:1
permanent [1] - 39:24
perspective [3] - 39:5, 57:19, 58:4
Peter [3] - 18:24, 26:11, 31:15
petition [4] - 3:9, 42:3, 42:7, 59:15
phrase [1] - 29:9
pick [1] - 39:9
piece [2] - 33:1, 59:23
pizza [2] - 57:3, 58:24
place [3] - 50:14, 54:24, 60:4
plan [12] - 17:14, 19:2, 19:4, 19:13, 19:15, 35:2, 35:7, 41:17, 42:5, 43:19, 44:14, 48:13
plans [1] - 53:11
plant [1] - 37:1
plants [4] - 37:15, 37:24, 38:5, 40:13
Plaza [1] - 2:5
pleading [1] - 2:16
pleasure [1] - 63:9
point [8] - 13:3, 22:7, 27:22, 30:17, 34:11, 35:4, 51:11, 55:9
pointed [1] - 14:13
points [1] - 42:11
policies [1] - 7:14
policy [3] - 32:5, 32:13, 42:18
political [2] - 9:5, 12:18
poor [1] - 48:17
poorer [1] - 47:8
pop [2] - 56:9, 57:3
pops [1] - 55:1
population [5] - 12:1, 16:6, 16:17, 23:13, 23:14
populations [1] - 16:19
position [2] - 8:22, 34:2
positions [1] - 60:12
positive [1] - 50:2
possible [2] - 7:21, 32:12
possibly [1] - 20:16
potential [2] - 10:6, 38:4
potentially [2] - 26:14, 57:2
power [1] - 19:9
practicable [1] - 46:6
practicing [1] - 63:18
pre [1] - 42:8
pre-SQIP [1] - 42:8
precision [2] - 22:11, 22:14
prefer [1] - 30:20
preferable [1] - 26:5
preliminary [1] - 48:6
premise [1] - 43:16
preparing [1] - 61:18
present [2] - 17:24, 49:12
presentation [2] - 39:10, 49:15
Presented [1] - 41:17
presented [7] - 7:15, 9:19, 16:4, 17:13, 35:21, 41:14, 62:10
presents [1] - 10:21
pretty [4] - 30:15, 32:9, 49:24, 58:16
preventing [1] - 5:21
previous [1] - 29:3
previously [5] - 11:11, 14:10, 21:6, 45:24, 48:23
primarily [1] - 8:23
primary [1] - 21:4
private [1] - 22:20
problem [4] - 8:1, 30:9, 50:20
problems [6] - 29:6, 32:1, 45:17, 49:4, 51:9, 53:2
procedural [1] - 6:14
procedures [1] - 7:15
proceeding [36] - 2:17, 7:12, 8:2, 8:23, 9:11, 9:17, 10:9, 10:17, 17:12, 17:19, 19:22, 20:3, 20:4, 20:13, 21:23, 22:18, 24:2, 24:8, 24:16, 26:3, 27:5, 29:21, 29:23, 29:24, 30:12, 30:18, 31:24, 32:21, 32:23, 35:7, 37:19, 41:15, 51:7, 53:8, 58:3
proceedings [1] - 44:13
process [14] - 5:18, 6:21, 19:15, 21:17, 26:5, 30:22, 31:3, 33:23, 34:23, 36:9, 39:7, 50:19, 56:1, 64:4
processes [1] - 29:19
procure [1] - 58:19
procured [1] - 11:11
produced [1] - 44:8
product [6] - 56:11, 56:12, 56:17, 56:23, 57:1, 57:5
products [1] - 57:11
Program [1] - 61:3
programs [1] - 58:19
progress [1] - 31:17
project [1] - 62:24
projects [1] - 37:11
proper [4] - 13:1, 26:12, 26:15, 40:2
properly [2] - 14:24, 31:21
proposal [2] - 9:18, 48:22
proposals [2] - 9:19, 49:10
propose [1] - 46:16
proposed [7] - 3:11, 37:16, 45:19, 45:22, 46:12, 48:10, 49:7
protect [2] - 10:5, 43:16
protection [3] - 43:17, 46:4, 47:18
protections [5] - 43:2, 45:18, 48:19, 56:6, 57:6
proud [1] - 64:16
proved [1] - 15:15
provide [6] - 27:7, 27:17, 39:5, 40:2, 55:23, 55:24
provided [3] - 42:12, 46:23, 47:2
provider [2] - 5:23, 58:21
providers [1] - 48:8
provides [3] - 23:9, 39:19, 46:4
providing [1] - 28:14
PUBLIC [1] - 1:1
Public [10] - 1:3, 2:3, 3:2, 3:10, 60:7, 60:12, 60:16, 60:18, 60:19, 62:3
public [5] - 2:2, 43:14, 54:5, 62:9, 64:12
published [1] - 65:13
purpose [4] - 15:16, 19:23, 36:8, 61:2
purposeful [1] - 13:9
purposely [2] - 13:6,

13:9
purposes [3] - 2:10, 16:2, 21:19
pursuant [2] - 3:10, 47:21
put [2] - 6:5, 12:21
puzzling [1] - 30:13

Q

quality [24] - 5:16, 6:9, 30:6, 41:16, 41:23, 42:5, 42:8, 42:12, 42:14, 42:21, 42:23, 44:22, 45:7, 45:11, 45:17, 45:20, 47:1, 48:18, 49:4, 49:23, 53:24, 55:9, 58:18
quantity [1] - 8:11
quarreling [1] - 29:8
questionable [1] - 9:3
questions [11] - 18:16, 18:17, 28:15, 34:21, 35:24, 39:11, 40:10, 49:17, 53:20, 58:5, 58:7
quick [5] - 4:5, 34:16, 40:11, 52:23, 64:20
quickly [4] - 7:20, 31:20, 35:16, 53:2
quite [2] - 25:21, 28:23

R

raise [1] - 6:16
raised [1] - 47:3
Raj [5] - 35:21, 36:1, 40:4, 41:5, 41:12
ramifications [1] - 53:4
rate [20] - 8:14, 9:2, 9:12, 9:22, 9:24, 14:21, 15:1, 16:1, 17:19, 19:24, 20:2, 20:5, 21:4, 21:6, 21:13, 26:14, 46:19, 48:8
ratemaking [5] - 18:21, 18:23, 21:4, 21:7, 21:20
ratepayers [4] - 3:13, 24:19, 33:13, 37:15
ratepayers' [2] - 37:8, 39:9
rates [10] - 9:16, 9:24, 10:4, 11:13, 11:16, 12:21, 14:21, 14:22, 18:13, 44:17
rather [2] - 29:23, 63:18
ratio [1] - 51:5
rational [1] - 26:16
real [1] - 22:7
realize [1] - 28:19
really [20] - 17:24, 21:23, 24:17, 28:10, 28:13, 32:4, 32:5, 32:8, 32:9, 32:11, 39:17, 40:2, 41:2, 41:3, 50:18, 51:9, 51:11, 52:14, 53:5, 58:17
reason [2] - 20:16, 44:24
rebate [2] - 46:15, 48:23
rebates [3] - 42:10, 46:13, 46:16
rebound [1] - 52:22
receive [1] - 46:22
received [4] - 8:7, 11:21, 14:4, 14:10
recently [1] - 36:21
recommendation [5] - 17:12, 18:20, 19:17, 27:4, 51:14
recommendations [35] - 3:24, 7:4, 7:9, 7:22, 10:22, 11:8, 14:8, 14:9, 14:15, 17:15, 19:1, 19:9, 19:16, 32:17, 32:20, 33:5, 33:10, 33:12, 33:15, 33:18, 34:6, 34:10, 34:12, 34:24, 35:6, 35:8, 35:13, 38:20, 38:23, 41:5, 41:10, 49:13, 59:8, 59:12, 59:21
recommended [1] - 8:8
recommending [1] - 48:11
recommends [3] - 37:18, 42:2, 46:11
record [14] - 2:11, 4:5, 4:11, 4:13, 20:20, 26:12, 31:12, 31:17, 31:18, 31:21, 32:19, 35:3, 60:8, 62:9
records [1] - 29:2
recourse [1] - 45:2
rectified [1] - 10:18
recurring [3] - 11:15, 14:23, 18:12
recuse [1] - 3:17
reduction [1] - 26:14
Reeder [1] - 50:13
reenforcements [2] - 35:20, 38:1
reference [1] - 55:4
referring [1] - 56:5
reflect [1] - 2:13
reflected [1] - 16:1
refunds [1] - 3:11
regard [3] - 17:10, 25:18, 47:1
regards [1] - 23:5
Regular [1] - 1:3
regular [2] - 7:11, 61:23
regularly [1] - 65:11
regulated [1] - 32:6
regulation [1] - 42:19
regulatory [2] - 43:1, 48:16
rehabilitate [1] - 45:14
reinforcements [1] - 37:21
reinstate [1] - 42:8
related [8] - 9:4, 10:4, 12:16, 14:5, 15:3, 15:11, 16:4, 28:14
relative [1] - 8:11
relatively [4] - 25:20, 44:4, 48:5, 63:2
reliability [14] - 36:6, 36:11, 36:13, 36:14, 36:22, 36:23, 37:3, 37:9, 37:12, 37:21, 38:18, 39:14, 40:24, 44:18
relying [1] - 21:5
remain [3] - 24:23, 63:12, 64:10
remedial [1] - 41:23
remedy [5] - 6:12, 6:17, 30:10, 30:21, 48:13
remember [1] - 34:7
reminds [1] - 61:24
removed [1] - 8:23
removing [1] - 17:5
renewals [1] - 4:16
repair [2] - 46:3, 47:8
repairing [2] - 46:1, 47:7
repairs [3] - 50:24, 51:21, 52:23
repeated [1] - 51:20
replace [1] - 52:3
report [13] - 8:4, 10:12, 10:19, 11:17, 13:4, 14:4, 14:5, 17:15, 17:20, 19:17, 34:8, 44:17, 53:23
reporting [6] - 28:9, 28:10, 42:21, 54:14, 55:10, 55:16
reports [1] - 38:19
repowered [1] - 39:19
repowering [8] - 35:19, 37:14, 37:20, 37:23, 38:4, 38:14, 39:21, 40:16
representing [1] - 43:13
request [1] - 9:18
requesting [1] - 42:4
requests [2] - 27:24, 42:7
require [3] - 37:22, 53:23, 55:10
required [4] - 6:2, 38:17, 44:14, 49:8
requirement [2] - 45:10, 54:14
requirements [1] - 42:22
requires [1] - 38:10
requiring [1] - 59:15
residential [12] - 43:3, 43:22, 44:21, 44:23, 45:12, 47:17, 47:20, 48:7, 50:15, 56:9, 56:15, 56:22
resistant [1] - 27:11
resolution [8] - 24:23, 25:8, 25:20, 60:6, 61:7, 62:8, 62:13, 62:17
resolve [1] - 27:2
resolved [2] - 53:2, 62:2
resolves [1] - 42:2
resolving [1] - 59:15
resource [1] - 36:18
resources [3] - 25:4, 36:19, 43:18
respect [4] - 19:1, 19:22, 22:2, 23:2
respectively [1] - 37:5
respond [1] - 49:8
responding [1] - 27:24
Response [6] - 7:6, 35:10, 41:7, 59:9, 59:18, 62:14
response [11] - 7:8, 10:16, 34:16, 35:12, 41:9, 46:9, 47:2, 48:16, 59:11, 59:20, 62:16
responses [2] - 27:17, 28:15
restoration [1] - 46:10
restore [1] - 46:6
restored [1] - 46:24
result [5] - 2:17, 9:8, 24:19, 30:7, 32:22
results [7] - 12:7, 16:6, 16:9, 26:22, 38:24, 39:7, 44:8
retire [2] - 36:6, 36:13
retired [2] - 36:20, 40:13
retirement [3] - 36:5, 36:7, 36:12
retiring [1] - 65:1
revenues [2] - 44:1, 45:8
review [9] - 4:19, 5:6, 6:7, 6:14, 19:7, 22:21, 44:3, 47:2, 49:11
revised [1] - 46:21
RFP [8] - 9:18, 10:11, 27:10, 27:13, 28:3, 28:5, 29:9
rid [1] - 52:16
rigor [1] - 23:9
risk [1] - 26:13
risks [1] - 26:17
robust [2] - 43:24, 47:19
role [5] - 4:6, 4:7, 4:18, 6:11, 61:18
roll [1] - 6:13
Room [1] - 2:5
room [1] - 30:16
root [3] - 19:16, 48:12, 59:5
ropes [1] - 64:5
routinely [1] - 6:13
rules [4] - 4:21, 5:1, 5:8, 61:19
run [4] - 7:19, 27:5, 29:13, 37:16

S

sample [4] - 12:6, 16:6, 16:9, 23:13
samples [1] - 16:20
sampling [8] - 16:8, 22:2, 23:3, 23:8, 23:9, 23:10, 24:1, 24:5
Sandra [1] - 56:21
Sandy [2] - 52:13, 56:8
satisfaction [1] - 19:11
SAYRE [8] - 1:16, 18:19, 19:18, 25:9, 34:22, 51:13, 58:13, 63:16

Sayre [4] - 18:18, 51:12, 52:13, 55:4
SBA [2] - 54:20, 54:22
scheduled [2] - 65:11, 65:14
School [1] - 60:24
SCHULER [2] - 22:9, 23:24
script [1] - 65:6
second [4] - 5:23, 35:18, 54:16, 59:14
Secretary [4] - 3:6, 3:15, 60:12, 60:13
SECRETARY [4] - 3:8, 65:8, 65:17, 65:20
section [1] - 39:3
Section [1] - 3:10
sector [4] - 53:24, 54:1, 55:16, 55:17
sectors [1] - 55:21
see [7] - 17:8, 17:13, 18:13, 25:7, 53:4, 57:16, 57:20
seeing [1] - 51:17
seek [1] - 36:9
seeking [1] - 38:12
seeks [1] - 48:21
seem [1] - 6:7
segment [2] - 48:4, 56:1
selected [2] - 10:9, 28:6
sent [1] - 5:5
separate [3] - 28:19, 28:20, 56:12
sequentially [1] - 25:16
series [2] - 4:4, 32:16
serious [2] - 30:9, 51:1
served [4] - 53:16, 60:11, 60:20, 61:1
SERVICE [1] - 1:1
service [64] - 5:16, 6:9, 6:10, 8:6, 8:9, 8:15, 8:16, 8:17, 8:24, 9:4, 10:22, 11:10, 11:15, 11:20, 11:23, 12:1, 14:12, 14:16, 14:23, 15:5, 22:21, 36:24, 41:16, 41:23, 42:5, 42:8, 42:12, 42:14, 42:21, 42:23, 44:5, 44:22, 45:6, 45:11, 45:16, 45:17, 45:20, 46:1, 46:6, 46:14, 46:19, 46:23, 47:1, 47:11, 48:13, 48:17, 49:3, 49:23, 50:23, 51:22, 52:9, 53:1, 53:24, 55:9, 58:18, 58:20, 58:21, 61:19, 62:5, 62:21, 64:13, 64:14
Service [10] - 1:3, 2:3, 3:3, 3:10, 60:7, 60:12, 60:16, 60:18, 60:19, 62:3
service's [1] - 51:19
services [6] - 8:6, 8:10, 43:22, 48:14, 48:24, 55:23
Services [1] - 52:5
session [6] - 3:2, 4:7, 29:14, 49:14, 62:9, 65:11
set [4] - 2:14, 11:13, 14:21, 18:12
setting [1] - 32:5
settled [1] - 21:15
settlement [1] - 24:23
seven [3] - 16:11, 51:21, 61:2
seven-day [1] - 51:21
share [2] - 44:1, 48:4
shared [1] - 8:6
sharing [1] - 18:8
sheer [1] - 28:17
shift [1] - 13:6
shine [1] - 40:21
shop [1] - 57:3
shops [1] - 56:9
short [1] - 51:24
shortcuts [1] - 24:22
shortly [1] - 8:13
showed [1] - 62:23
showing [1] - 64:5
shows [1] - 13:16
side [2] - 17:1, 17:24
signed [1] - 5:7
significant [8] - 8:17, 13:17, 16:13, 16:23, 17:8, 18:7, 20:9, 51:16
significantly [1] - 23:12
similar [1] - 22:12
simply [4] - 5:16, 15:21, 26:21, 39:3
single [4] - 11:2, 14:16, 14:17, 23:15
sit [1] - 53:12
Siting [1] - 60:14
sitting [1] - 63:18
situations [1] - 23:12
six [2] - 44:10, 63:10
size [3] - 10:15, 28:18, 57:12
skills [2] - 61:8, 61:10
SLAs [1] - 32:2
slide [14] - 7:24, 9:9, 10:11, 11:17, 13:10, 14:3, 15:2, 17:7, 17:8
slides [1] - 7:19
Sloane's [1] - 56:21
slow [2] - 27:19, 29:6
slowing [1] - 34:23
small [17] - 48:5, 51:9, 51:15, 51:18, 52:21, 53:5, 54:1, 54:8, 54:19, 54:21, 55:1, 55:2, 55:8, 56:6, 56:10, 58:15
smaller [2] - 54:24, 55:5
smoothly [2] - 63:2, 63:4
softer [1] - 30:11
solely [1] - 2:9
solicitation [1] - 38:11
soliciting [1] - 46:12
solutions [4] - 36:18, 37:7, 38:8, 38:19
sometimes [1] - 56:12
soon [2] - 32:11, 46:6
sorry [2] - 29:11, 64:22
sort [3] - 6:13, 23:1, 50:16
sought [3] - 42:17, 45:12, 48:1
sounds [3] - 30:6, 30:11, 31:11
source [1] - 39:20
sources [1] - 22:12
special [1] - 43:4
specialty [1] - 21:9
specific [4] - 16:12, 23:5, 26:24, 46:7
specifically [3] - 4:14, 38:3, 46:16
specifics [1] - 40:1
speeded [1] - 27:23
spent [1] - 61:15
spite [1] - 22:15
spot [1] - 47:15
SQIP [16] - 42:6, 42:8, 42:11, 42:15, 42:17, 42:20, 43:3, 43:16, 44:3, 44:9, 44:19, 44:23, 47:13, 47:15, 47:18, 47:22
staff [16] - 8:15, 8:20, 21:5, 21:11, 21:17, 26:23, 27:8, 27:21, 37:18, 38:22, 40:20, 46:11, 48:1, 49:1, 49:12, 58:5
staff's [2] - 18:19, 47:2
staffing [1] - 45:5
standard [4] - 22:3, 22:11, 23:1, 54:7
standards [5] - 4:21, 23:4, 23:5, 24:1, 44:6
start [3] - 42:1, 49:19, 59:4
started [2] - 9:17, 9:22
starting [1] - 60:21
STATE [1] - 1:1
state [7] - 4:22, 5:20, 29:2, 52:22, 53:16, 57:14, 60:21
State [9] - 2:3, 2:5, 3:2, 42:3, 60:7, 60:11, 60:13, 62:3, 64:15
statement [1] - 2:18
statewide [2] - 47:6, 48:3
statistical [8] - 16:5, 22:1, 22:17, 23:3, 23:5, 23:8, 31:6, 31:9
statistically [3] - 13:17, 16:13, 51:16
statistics [2] - 23:21
status [2] - 49:5, 58:9
stay [1] - 65:2
steps [1] - 25:5
still [3] - 7:1, 15:24, 31:11
storm [1] - 52:22
storms [1] - 44:7
story [1] - 17:24
straight [1] - 32:13
streamlined [1] - 42:20
strip [1] - 50:16
strong [2] - 21:24, 61:10
subject [2] - 44:12, 47:15
submit [1] - 38:15
subpar [1] - 47:11
subpopulations [3] - 16:11, 16:12, 16:20
subsection [1] - 39:3
subsequent [1] - 49:13
success [1] - 51:5
sufficient [4] - 15:14, 18:7, 42:9
summarized [1] - 17:3
superstorm [2] - 52:4, 53:3
Superstorm [1] - 52:13
support [8] - 13:1, 15:22, 18:19, 26:12, 31:19, 31:20, 36:24, 51:14
supposed [3] - 28:8, 60:2, 60:4
swift [1] - 25:20
swiftly [1] - 34:19
swiftness [1] - 24:18
synonymously [1] - 36:8
system [12] - 10:16, 11:4, 13:2, 14:12, 14:17, 17:16, 28:18, 52:16, 61:14, 61:15, 62:22
System [1] - 36:10
systematic [2] - 13:5, 37:13
systems [3] - 10:23, 21:18, 28:20

T

table [1] - 26:20
tailored [1] - 48:16
tandem [1] - 25:16
target [1] - 27:23
tariff [4] - 45:22, 46:7, 46:12, 48:22
tariff-based [1] - 48:22
Task [1] - 38:2
tax [2] - 3:11, 22:11
teaching [1] - 63:21
techniques [1] - 23:6
technologies [1] - 61:13
telecommunications [2] - 43:21, 58:20
Telecommunications [1] - 41:18
telephone [2] - 42:18, 58:10
Television [1] - 60:17
television [1] - 4:22
temporary [1] - 10:3
ten [5] - 7:20, 10:21, 14:8, 17:15, 19:1
term [6] - 37:8, 38:8, 39:20, 40:23, 51:24, 58:9
terms [1] - 30:21
territory [1] - 6:11
test [1] - 13:13
tested [2] - 11:19, 12:4
testimony [1] - 8:16
testing [3] - 11:18, 12:7, 15:3
testings [1] - 13:11

thanking [1] - 64:1
themselves [1] - 25:8
thereafter [1] - 38:22
therefore [5] - 45:1, 46:7, 48:10, 62:2, 62:12
thereto [1] - 49:6
thinking [4] - 6:18, 40:14, 54:11, 55:6
thoroughly [1] - 6:21
thousand [2] - 30:17, 44:13
thousands [1] - 61:17
three [4] - 12:10, 13:16, 27:20, 39:15
Three [1] - 2:4
three-party [1] - 27:20
throughout [1] - 8:22
throwing [1] - 15:20
THURSDAY [1] - 1:6
Thursday [2] - 65:19, 65:21
timeframe [2] - 24:10, 37:9
timely [2] - 10:16, 50:24
timetable [1] - 29:22
timing [1] - 24:7
tirelessly [1] - 61:16
to.. [1] - 51:12
today [18] - 3:9, 7:15, 20:23, 26:1, 26:17, 26:20, 29:22, 30:6, 30:11, 30:20, 30:24, 31:19, 32:16, 41:22, 43:19, 58:10, 64:19, 64:22
today's [1] - 65:9
together [1] - 41:14
took [8] - 10:13, 27:10, 27:14, 28:3, 28:11, 28:15, 28:24, 61:18
total [2] - 43:8, 47:6
totally [1] - 52:12
touch [1] - 65:2
tournament [1] - 61:24
toward [2] - 30:20, 52:17
traceable [1] - 11:4
track [2] - 25:15
trail [1] - 30:2
train [1] - 61:6
training [1] - 61:8
transaction [4] - 11:18, 13:11, 15:3, 15:4
transactions [23] - 9:4, 11:3, 11:20, 11:24, 12:2, 12:3, 12:4, 12:6, 12:9, 12:16, 12:23, 15:8, 15:9, 15:12, 15:21, 15:23, 17:4, 23:15, 23:16, 27:18, 28:22
transcript [5] - 2:2, 2:7, 2:9, 2:12, 2:18
transition [1] - 52:15
transmission [8] - 35:20, 36:16, 37:11, 37:17, 37:20, 38:1, 38:8, 39:23
transparent [1] - 11:3
transpired [1] - 7:22
treatment [3] - 18:23, 21:12, 47:15
trend [1] - 51:23
trends [2] - 52:7, 57:16
trial [2] - 21:11, 21:16
trouble [2] - 44:16, 46:15
troubles [2] - 47:4, 47:7
troubling [1] - 54:3
truly [1] - 64:9
trunks [1] - 47:24
try [3] - 7:20, 27:2, 51:8
trying [2] - 39:6, 50:19
turning [5] - 7:24, 10:11, 13:10, 14:3, 17:7
twelfth [1] - 46:23
two [16] - 28:14, 28:19, 28:20, 32:16, 32:23, 35:6, 36:21, 37:8, 37:14, 39:2, 39:8, 41:13, 41:22, 53:21, 58:24, 59:3
types [2] - 12:10, 52:5
typical [1] - 36:9

U

ultimately [2] - 27:7, 33:13
uncertain [1] - 30:12
uncertainty [1] - 31:12
uncovered [1] - 9:3
undefined [1] - 51:10
under [4] - 40:7, 44:19, 46:21, 54:22
underlying [1] - 43:16
undermine [1] - 45:17
underneath [1] - 5:19
unexpected [1] - 10:14
unexpectedly [1] - 64:23
unfair [1] - 13:7
uniform [2] - 47:21, 54:18
units [2] - 37:2
University [1] - 60:23
unofficial [1] - 2:2
unresolved [1] - 46:15
unsupported [4] - 12:22, 15:8, 15:11, 17:4
unwarranted [1] - 44:24
up [10] - 4:5, 16:7, 17:23, 27:16, 27:23, 29:13, 29:17, 31:2, 32:5, 64:22
upgrades [3] - 36:16, 37:17, 39:23
upwards [1] - 5:21
useful [1] - 51:7
user [1] - 49:2
user-focused [1] - 49:2
utilities [19] - 9:13, 10:24, 11:5, 11:21, 12:20, 13:13, 13:17, 15:6, 15:17, 16:1, 17:5, 17:17, 32:1, 32:6, 32:14, 37:11, 38:10, 38:17, 40:20
utility [8] - 12:16, 15:16, 17:9, 35:20, 36:11, 36:16, 37:16, 37:20
utility-related [1] - 12:16

V

validity [1] - 22:16
value [1] - 39:8
valued [1] - 12:5
variety [1] - 60:12
various [1] - 13:2
venue [1] - 65:13
verify [1] - 11:6
Verizon [17] - 41:16, 42:4, 42:13, 42:23, 43:12, 43:24, 44:4, 44:11, 45:10, 46:9, 48:11, 49:7, 51:18, 52:2, 52:9, 55:23, 59:5
Verizon's [8] - 41:23, 42:14, 43:8, 44:16, 44:21, 45:20, 46:1, 47:7
Vermont [1] - 60:24
view [1] - 55:10
views [1] - 25:14
vigorous [1] - 29:23
vision [1] - 60:1
voice [2] - 47:22, 47:24
voice-grade [1] - 47:24
vote [2] - 59:14, 60:9
voted [1] - 7:1
votes [1] - 59:3
voting [2] - 3:18, 3:20

W

waiting [1] - 32:18
walked [1] - 63:11
warranted [1] - 46:8
Water [3] - 3:12, 3:13, 35:22
ways [1] - 61:5
Wednesday [2] - 65:18, 65:20
week [1] - 54:17
weigh [1] - 20:22
welcome [1] - 59:1
whereas [8] - 60:10, 60:20, 60:22, 61:1, 61:6, 61:9, 61:12, 61:21
white [2] - 47:15, 50:13
whole [1] - 55:13
wholeheartedly [1] - 56:4
wholesale [1] - 48:6
window [2] - 46:3, 46:5
wireless [2] - 44:1, 45:4
wireline [1] - 47:16
wish [2] - 3:17, 63:14
wishes [1] - 62:5
withstand [1] - 52:3
wonder [1] - 6:14
wonderful [1] - 64:8
wondering [1] - 40:17
word [2] - 40:5, 64:20
words [5] - 16:14, 26:2, 31:6, 50:14, 63:8
Workers [1] - 43:12
workup [1] - 4:7
world [1] - 51:2
worth [1] - 11:24
wreaked [1] - 52:14

Y

year [14] - 9:24, 10:13, 14:2, 14:18, 14:19, 27:10, 28:3, 28:4, 28:11, 29:9, 36:4, 37:9, 57:15, 57:16
years [17] - 13:13, 18:8, 31:2, 36:20, 39:15, 39:19, 60:5, 60:21, 61:2, 61:22, 63:10, 63:13, 63:17, 64:2, 64:12, 64:14, 65:1
YORK [1] - 1:1
York [29] - 1:9, 1:15, 2:3, 2:6, 3:2, 3:5, 5:22, 9:13, 9:15, 10:24, 11:5, 11:21, 13:12, 17:5, 18:3, 25:22, 36:10, 38:2, 42:3, 52:2, 55:1, 58:10, 60:7, 60:11, 60:13, 62:3, 64:15, 64:21, 65:15
York's [2] - 41:16, 42:5
Yorkers [1] - 64:16
young [1] - 64:24

Z

zero [1] - 16:15