

DAVID J. MEYER  
VICE PRESIDENT AND CHIEF COUNSEL OF  
REGULATORY & GOVERNMENTAL AFFAIRS  
AVISTA CORPORATION  
P.O. BOX 3727  
1411 EAST MISSION AVENUE  
SPOKANE, WASHINGTON 99220-3727  
TELEPHONE: (509) 495-4316  
EMAIL: david.meyer@avistacorp.com

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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION ) CASE NO. AVU-E-13-09  
OF AVISTA CORPORATION FOR A ) CASE NO. AVU-G-13-02  
FINDING OF PRUDENCE FOR 2010-2012 )  
EXPENDITURES ASSOCIATED WITH )  
PROVIDING ELECTRIC AND NATURAL GAS ) DIRECT TESTIMONY  
ENERGY EFFICIENCY SERVICE IN THE ) OF  
STATE OF IDAHO ) CHRIS D. DRAKE  
\_\_\_\_\_ )

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

1 I. INTRODUCTION

2 Q. Please state your name, employer and business  
3 address.

4 A. My name is Chris Drake. I am employed by Avista  
5 as Manager of Demand Side Management (DSM) Program  
6 Delivery. My business address is East 1411 Mission  
7 Avenue, Spokane, Washington.

8 Q. Would you please describe your education and  
9 business experience?

10 A. I graduated from Gonzaga University in 1992 with  
11 a Bachelor of Arts degree in Communications. I completed  
12 my Project Management certificate in 2005 from Washington  
13 State University and Gonzaga University.

14 I joined the Company in 1996 in the Hydro Licensing  
15 and Safety Department. In 1999 I accepted a program  
16 coordinator position and later became a program manager  
17 within the Marketing Department in 2000. After the 2001  
18 energy crisis, I assumed responsibilities for the majority  
19 of the residential portfolio that included prescriptive  
20 rebate offerings and later became responsible for the Low  
21 Income Weatherization program. I began my current position

1 in August of 2010. I am responsible for design and  
2 implementation of in-house and third-party implemented  
3 program delivery which includes Avista's prescriptive  
4 residential and some commercial and industrial DSM program  
5 offerings.

6 Prior to joining Avista, I served as an Infantry  
7 officer in the United States Army from 1992 until 1996,  
8 finishing my service as the battalion logistics officer  
9 deployed to Panama.

10 **Q. What is the scope of your testimony in this**  
11 **proceeding?**

12 A. I will provide an overview of the Company's DSM  
13 program offerings available to Idaho customers in the  
14 2010-2012 program years. I will also respond to the  
15 results from the third-party evaluation, measurement and  
16 verification (EM&V) memo specific to non-residential  
17 process evaluation.

18 **Q. Are you sponsoring any exhibits to be introduced**  
19 **in this proceeding?**

20 A. Yes. I am sponsoring Exhibit No. 2, Schedules 1  
21 and 2. Schedule 1 illustrates programs offered during

1 2010-2012, along with program descriptions, eligibility  
2 requirements, incentive amounts and significant  
3 implementation changes made during this time period. Also  
4 included in this schedule are total savings, cost-  
5 effectiveness, non-energy benefits when applicable, net-  
6 to-gross values, discount rates, total expenditures by  
7 incentives and non-incentive utility cost, and a list of  
8 measures with energy savings, and measure lives.<sup>1</sup> Schedule  
9 2 is the Cadmus 2012 Process Evaluation Memorandum dated  
10 August 2, 2013.

## 11 II. OVERVIEW

12 **Q. Would you please provide a brief overview of**  
13 **Avista's DSM programs?**

14 **A. Yes.** Avista's core objective has historically  
15 been to provide customers with cost-effective energy  
16 efficiency services. Avista is in its 35<sup>th</sup> year of doing  
17 so. Avista's approach is to use the most effective  
18 "mechanism" to deliver energy efficiency services to  
19 customers. These mechanisms are varied and include: 1)

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<sup>1</sup> Labor is included within non-incentive utility cost. DSM labor is charged at a multi-state and fuel level, rather than a program level, and allocated to the individual states. The "labor" distinction or coding is dropped during this allocation process. For purposes of Exhibit No. 2, Schedule 1, non-incentive utility cost expense is allocated based on an avoided cost.

1 prescriptive programs (or "standard offers" such as high  
2 efficiency appliance rebates); 2) site-specific or  
3 "customized" analyses at customer premises; 3) "market  
4 transformational," or regional, efforts with other  
5 utilities through NEEA; 4) low-income energy efficiency  
6 services through local Community Action Agencies; 5) low-  
7 cost/no-cost advice through a multi-channel communication  
8 effort; and 6) support for cost-effective appliance  
9 standards and building codes. I will be describing all of  
10 these program delivery mechanisms as they apply to  
11 residential, nonresidential and low-income customers later  
12 in my testimony.

13 **Q. How does Avista make available its DSM program**  
14 **offerings and educate customers about energy savings?**

15 A. Avista continually provides opportunities for  
16 customers to learn about low cost/no cost ways to manage  
17 their home and business energy usage. The "Every Little  
18 Bit" Campaign has been the primary driver of this effort.  
19 We also provide tips through the Avista Utilities website,  
20 on billboards, as well as radio and television spots  
21 throughout both the heating and cooling seasons. A

1 variety of tips are provided throughout the year to help  
2 encourage efficient use of space heating and cooling,  
3 appliances and electronics as well as linking to and  
4 promoting related rebate opportunities as applicable. The  
5 campaign is reinforced by website tools and information  
6 including a comprehensive online Home Energy Analyzer  
7 where customers can see a representation of how their  
8 energy is being used and sign up for savings plans that  
9 fit their lifestyles. Similar broad-based techniques are  
10 used for both residential and nonresidential.

11 In addition, both residential and nonresidential  
12 customers have access to direct outreach activities.  
13 Avista offers energy fairs for residential customers, with  
14 emphasis given to low-income customers. Direct outreach  
15 for nonresidential customers is delivered through account  
16 executives and efficiency engineers who provide on-site  
17 information regarding energy savings opportunities and  
18 available program information.

19 **III. DSM PROGRAM OVERVIEW**

20 **Q. Please describe the residential DSM program and**  
21 **offerings provided in 2010 through 2012.**

1           A.    The Company's residential portfolio provides a  
2    variety of measures, through different delivery channels,  
3    offering energy efficiency improvement opportunities to  
4    Avista customers. The majority of the residential  
5    portfolio is implemented through prescriptive rebates and  
6    processed in-house by Avista. New construction and  
7    existing residential homes (up to four-plex) that heat  
8    with Avista electric or natural gas, select from a list of  
9    energy efficiency measures with rebates for consideration  
10   of installation in their homes. Customers must purchase  
11   and install the equipment or qualifying energy efficiency  
12   measure and submit a rebate application with the  
13   appropriate documentation within 90 days of installation  
14   in order to receive an incentive.

15           In the 2010-2012 program years Avista offered the  
16   following residential programs to Idaho electric and/or  
17   natural gas customers noted in Illustration 1:

18  
19  
20  
21

1 Illustration No. 1:

2 **RESIDENTIAL**

3 High Efficiency Furnace/Boiler  
4 High Efficiency Heat Pump  
5 Ductless Heat Pump  
6 Air Conditioner Replacement  
7 High Efficiency Variable Speed Motor  
8 High Efficiency Tanked and Tankless Water Heater  
9 Space Heat Conversion (Direct Use of Natural Gas)  
10 Water Heat Conversion (Direct Use of Natural Gas)  
11 Multifamily Natural Gas Market Transformation (Direct  
12 Use of Natural Gas)  
13 Ceiling, Attic, Floor, Wall Insulation  
14 Window Replacement  
15 Fireplace Damper  
16 ENERGY STAR® Homes  
17 ENERGY STAR® Appliances  
18 CFL (and CFL Recycling) Promotions  
19 "Second" Refrigerator/Freezer Recycling Program  
20 Community Events and Workshops  
21 Low-cost/no-cost information  
22 On-line Home Energy Audits and Analysis  
23 Simple Steps Smart Savings (CFLs and Showerheads)  
24 CFL Direct Mail

25  
26 The residential programs shown above are primarily  
27 standard offerings, otherwise known as prescriptive  
28 programs.

29 Idaho residential customers also received Avista-  
30 sponsored programs in the form of manufacturer buy-downs  
31 for compact fluorescent lighting and low-flow showerhead  
32 measures. These products have a lower retail price point



1 at the time of purchase and are usually part of a  
2 regional, multi-state program offering.

3 Q. Please describe the nonresidential DSM offerings  
4 provided during this time.

5 A. Within the nonresidential segment, programs are  
6 offered to retail electric and natural gas customers  
7 through a combination of prescriptive rebates and site  
8 specific assessments. Prescriptive rebates are geared  
9 toward relatively uniform measures, applications and  
10 energy savings. This delivery method reduces  
11 implementation expense while simplifying participation for  
12 both customers and trade allies. The site specific  
13 offerings are available for all other efficiency measures  
14 and applications. In these situations, each energy  
15 efficiency project is individually analyzed based on the  
16 measure being installed and considers other variables that  
17 may be present in the building or in the process  
18 operation.

19 Illustration No. 2 below includes a list of  
20 nonresidential rebates available for electric and/or  
21 natural gas customers in the 2010-2012 program years:

1 Illustration No. 2:

2 **NONRESIDENTIAL (COMMERCIAL & INDUSTRIAL)**

- 3 EnergySmart Grocer
- 4 Power Management for PC Networks
- 5 Premium Efficiency Motors
- 6 Food Service Equipment
- 7 Commercial HVAC Variable Frequency Drives
- 8 Retro-Commissioning
- 9 Commercial Clothes Washers
- 10 Vending Machine Controllers
- 11 Lighting and Controls
- 12 Green Motors Rewind Program
- 13 Commercial Natural Gas HVAC
- 14 Commercial Windows and Insulation
- 15 Standby Generator Block Heater
- 16 Demand Controlled Ventilation
- 17 Steam Trap Repair/Replacement
- 18 LEED Certification
- 19 Refrigerated Warehouse Program
- 20 Side Stream Filtration
- 21 LED Traffic Signals
- 22 Electric to Natural Gas Water Heater Conversion
- 23 Program
- 24 Site Specific Offerings in Various End Uses

25

26 Avista offers site-specific incentives for commercial  
27 and industrial customers for custom projects. The site-  
28 specific program provides incentives on cost-effective  
29 commercial and industrial energy efficiency measures that  
30 meet required simple payback and measure life  
31 requirements. This is implemented through on-site audits  
32 and analyses, customized project evaluation, and dual fuel  
33 incentive calculators for energy savings generated

1 specific to the customer's premise or process ("project").  
2 Incentives were offered for any measure that had greater  
3 than a one-year and less than an eight-year simple payback  
4 for lighting measures or less than a thirteen-year simple  
5 payback for non-lighting measures.

6 Q. How does Avista address energy efficiency  
7 programs for low-income customers?

8 A. The residential low-income program is comprised  
9 primarily of site-specific offerings delivered by local  
10 Community Action Agencies (CAA) to benefit income-  
11 qualified, residential customers. Avista contracts with  
12 agencies to utilize existing infrastructure currently in  
13 place as a result of delivering the Federal Weatherization  
14 Assistance and Low Income Home Energy Assistance Programs  
15 (LIHEAP). The customer intake process includes potential  
16 consideration of participation for energy assistance and  
17 other income-qualified programs that can also serve as  
18 referrals for weatherization services.

19 Low-income efficiency measures are similar to  
20 measures offered under the traditional residential  
21 prescriptive programs.



1 filed December 7, 2012 and January 4, 2013 to the  
2 Commission Staff's draft report supporting Staff's  
3 recommendations related to Avista.

4 Subsequently, the Company has identified more  
5 opportunities to provide programs related to the direct  
6 use of natural gas for Idaho low-income customers through  
7 the CAA, such as electric to natural gas space and water  
8 heater conversions. Natural gas fuel conversion tends to  
9 be a more cost-effective measure with higher TRC results.  
10 The Company believes if more of these measures were  
11 implemented by the CAAs, it would improve cost-  
12 effectiveness for the overall low-income portfolio.

13 The 2012 results included the effects of recent  
14 efforts to identify electric to natural gas conversions  
15 along with several non-energy benefits being applied in  
16 addition to the dollar-for-dollar non-energy benefit  
17 assumed for health and human safety. These contributed to  
18 a successful TRC of 1.07 for the electric low-income  
19 program.<sup>3</sup>

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<sup>3</sup> Natural gas low-income was less than 1.0 TRC; all natural gas DSM programs are currently suspended in Idaho.

1           Q.    In light of declining electric avoided costs,  
2    what program modifications do you anticipate making to  
3    assist with the low-income programs' continued cost-  
4    effectiveness?

5           A.    The 2012 low-income weatherization electric  
6    programs were cost-effective. As stated earlier, 2012 did  
7    include the additional emphasis on electric to natural gas  
8    conversions that the agency is continuing to pursue.  
9    While the most recent year was cost-effective, whether  
10   enough conversions can be identified and completed to  
11   offset lower avoided costs continues to be a challenge.

12           The delivery of low-income programs by the Community  
13   Action Agency is an important area of management focus.

14           Q.    Please provide an overview of the two new  
15   programs launched in 2011 and 2012.

16           A.    Among several new program offerings, in 2011,  
17   Avista distributed via US Postal Service boxes of energy  
18   efficient compact fluorescent light (CFL) bulbs to all  
19   residential and small commercial customers on an "opt-out"  
20   basis. In total, 745,456 bulbs (93,182 boxes) were  
21   distributed to Idaho residential and small commercial

1 customers with verified first-year savings of 13,290 MWh<sup>4</sup>.  
2 Subsequent process evaluation conducted by a third-party  
3 demonstrated high satisfaction with the program as well as  
4 a high level of awareness of energy efficiency programs.

5 During 2012, the Company leveraged regional and  
6 national efforts to accelerate the conversion of T12  
7 fluorescent lighting fixtures to higher efficiency T8  
8 fixtures. Avista's conversion program was specifically  
9 designed to target the replacement of existing operational  
10 T12 fixtures. The program featured a prescriptive  
11 incentive available for a limited period of time, an  
12 application process specific to the needs of this program  
13 and a coordinated outreach program focusing the customers  
14 attention on the need to take action by a pre-specified  
15 deadline. The program required customers to submit their  
16 rebate applications between January 1, 2012 and December  
17 31, 2012.

18 Customer participation significantly exceeded  
19 expectations with a total of 1,500 rebates being issued

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<sup>4</sup> These verified savings are higher than the Regional Technical Forum's (RTF) deemed 15 kWh/year/mailed CFL based on Cadmus independent analysis of room distribution, residential and small commercial run-times, in-service rate, etc.

1 during this time with an estimated savings of 15 million  
2 kWhs. Participation was heavily weighted towards the last  
3 month of that program, indicating the value of the pre-  
4 specified program deadline and further defining a  
5 potentially replicable approach to replace-before-burnout  
6 efficiency opportunities in the future.

7

8 IV. EVALUATION, MEASUREMENT AND VERIFICATION

9

10 Q. Would you please describe the engagement of  
11 Cadmus for Avista's evaluation, measurement, and  
12 verification (EM&V)?

13 A. Yes. A central component of Avista's EM&V  
14 Framework and Annual EM&V Plan is independent, or third-  
15 party, verification of the Company's claimed efficiency  
16 savings. Cadmus was retained, after a competitive  
17 Request-for-Proposal process, to perform impact and  
18 process evaluations. Impact evaluation independently  
19 estimates and/or measures realized savings at the customer  
20 premises through a variety of means, including metering  
21 equipment, billing analyses and quantitative methods.  
22 Process evaluations examine potential for program delivery



1 improvements based on participant and nonparticipant  
2 surveys, among other means.

3 Q. With regard to the impact evaluation, what is a  
4 realization rate and how does this affect claimed savings?

5 A. Energy efficiency savings are estimated based  
6 on the per-measure or unit (e.g., T-8 commercial lighting,  
7 ENERGY STAR® Dishwashers, or ceiling insulation) accepted  
8 value multiplied by the number of units installed.  
9 Thereafter, the number of units installed is verified for  
10 accuracy and proper installation and the actual savings  
11 value per measure and operation can be tested by data  
12 loggers, billing analysis and other analytical means. If  
13 the realized or verified savings estimate per measure are  
14 confirmed without change and if the number of  
15 installations, upon verification, are found to be properly  
16 installed and equal to those claimed, then the realization  
17 rate is 100%. If the actual savings level per measure is  
18 less or if the installed units are less, then the  
19 realization rate would be less.

1           As noted in the Cadmus' memo at page 18, Avista's  
2 realization rate showed significant improvement from 2011  
3 to 2012.

4           Q.    The Cadmus' 2012 Process Evaluation Memorandum  
5 dated August 2, 2013, makes a series of recommendations  
6 regarding process improvements to Avista's DSM programs.  
7 What is the Company's response to these recommendations?

8           A.    First, the purpose of a process evaluation is  
9 for continued program improvement. The Company has  
10 historically reviewed and modified its DSM programs for  
11 improved use of customer funds and better service to  
12 customers. Cadmus' approach is to provide real-time  
13 feedback to allow for continuous improvements and course  
14 corrections as needed. I address specific areas for  
15 modification to Avista's systems later in my testimony.

16           Q.    Do you agree with Cadmus' conclusions and  
17 recommendations regarding the large project review?

18           A.    Yes. At page 17 of the memo, Cadmus notes "the  
19 2011 Large Project Review process was not implemented  
20 successfully..." Specifically, Cadmus had several

1 recommendations to assist Avista with successful  
2 implementation, and an effective process:

- 3 • Effectively communicate the new project review  
4 process to all key team members;  
5
- 6 • Ensure there are clear protocols in place for  
7 addressing issues identified during the review and  
8 spot-check;  
9
- 10 • Establish a goal for the number or percentage of  
11 projects that should undergo a random spot-check;  
12
- 13 • Establish a reasonable goal for how long the review  
14 process should take;  
15
- 16 • Consider adopting a tiered approach to the review so  
17 that larger, high-risk projects receive more scrutiny  
18 before contracts are issued and incentives are paid;  
19 and  
20
- 21 • Consider structuring random spot-checks, or "audits,"  
22 to occur at various times of the process.  
23

24 Consequently, we began establishing a new procedure  
25 and program implementation to assure that full  
26 documentation was in place at various stages of  
27 nonresidential site-specific projects. For example, two  
28 checklists, one prior to contracting and one prior to  
29 payment, were developed and implemented mid-2013 and  
30 accompany all site-specific projects for documentation and  
31 review purposes. This was coincident with a "roles and

1 responsibilities" initiative to assure accountabilities  
2 will be properly aligned and communication channels  
3 clearly open. These actions are intended to be responsive  
4 to Cadmus' recommendations on the Large Project Review  
5 Process.

6 Q. The Cadmus memorandum notes data entry errors, and  
7 provides recommendations for improving the database entry  
8 accuracy and processes. Do you agree with these findings?

9 A. Yes. Specifically, on page 19 of the memo,  
10 Cadmus recommends:

- 11 • Continue to move forward implementing the new  
12 review process to identify and resolve savings  
13 calculation errors;
- 14 • Clearly document legacy projects or market  
15 transformation projects in SalesLogix; and
- 16 • Continue to improve data entry in SalesLogix to  
17 reduce missing or incorrect fields and enhance  
18 the comprehensive dataset.

19  
20 The Company agrees there are improvements that should  
21 be made to data entry accuracy, as well as processes and  
22 procedures around efficient and consistent use of the  
23 database. For example, there were instances of  
24 installation dates that preceded payment dates due to  
25 incorrect entry into sales-logix. Site-specific

1 verification dates may precede payment dates, for example,  
2 where the payment date is the date the check is cut and  
3 the verification date is coincident with the verification  
4 confirmation and hand delivery of the actual check.

5 Avista agrees that documentation improvements within  
6 our nonresidential database should be made and these  
7 improvements are in progress.

8 Areas of emphasis are existing database fields that  
9 are used differently by different programs and work  
10 groups. Fields will be reviewed to confirm they are a  
11 value-added field for reporting and evaluation,  
12 consistently used by all work groups, or eliminated if  
13 appropriate. The goal, again, is to improve documentation  
14 and data fields in order to further ease reporting and  
15 evaluation.

16 Another example is the post-verification date field,  
17 which includes prescriptive projects that are randomly  
18 sampled for post-verification, customers who did multiple  
19 installations of similar measures and a percentage of like  
20 measures that were post-verified, as well as users who  
21 documented post-verification in notes or attachments

1 rather than the data field. Avista acknowledges that we  
2 need to clarify our procedures around installation  
3 verifications and ensure that documentation (e.g. pictures  
4 and dates) are consistently recorded within the  
5 nonresidential database.

6 Q. Tables 2 & 3 from the Cadmus' memorandum  
7 illustrate prescriptive projects on a system basis that  
8 exceeded the simple payback periods and 50% cap. Can you  
9 explain why these projects were provided incentives?

10 A. Yes. Prescriptive programs allow the Company to  
11 offer a fixed amount for the installation of predetermined  
12 efficiency measures without the need for individualized  
13 calculation of the rebate or the signature of a pre-  
14 project agreement. This approach is critical to the  
15 efficient marketing and administration of programs  
16 promoting these measures. Prescriptive programs have been  
17 a critical element to the Avista DSM portfolio for many  
18 years.

19 As stated in the Cadmus memo at page 6, "the sample  
20 size for manual review was not large enough to extrapolate  
21 findings to the full population. However, based on these

1 findings, it is probable that a large proportion of the  
2 projects in Table 2 involved T12 to T8 conversions...".

3 The memorandum's assumption is correct; the  
4 prescriptive lighting projects included market  
5 transformation T12 conversions that were designed to  
6 exceed the 50% cap guidelines to accelerate conversions.

7 The Company's tariff did not require prescriptive  
8 projects to be subject to the simple payback period and  
9 incentive cap restrictions at the time of rebate  
10 application approval. Avista filed tariff revisions (Case  
11 No. AVU-E-13-04), as noted in Company witness Mr. Folsom's  
12 direct testimony, on June 26, 2013, to include additional  
13 language to provide greater clarity of how these programs  
14 are offered. The following tariff language was approved by  
15 the Commission on August 22, 2013:

16 Incentive levels for these programs are based on  
17 market conditions at the time of program design and  
18 are not dependent on actual project cost relative  
19 to incentive caps. Incentives shall not exceed  
20 project costs.

21  
22 All site-specific, nonresidential projects met  
23 applicable simple payback and 50% funding cap  
24 requirements.

1           Q. What efforts are being made to improve project  
2 documentation related to nonresidential programs?

3           A. Avista agrees that process improvements can be  
4 made in its nonresidential project documentation as noted  
5 by Cadmus. In an effort to address this finding, two  
6 checklists have been implemented prior to the contracting  
7 of projects and the payment of incentives for  
8 nonresidential site-specific projects in an effort to  
9 ensure consistent and comprehensive project documentation  
10 and application of the Company's tariff Schedules 90 and  
11 190 (Electric and Natural Gas Energy Efficiency Programs).

12           Cadmus recommended additional notation of "legacy" or  
13 "market transformation" type projects within the database  
14 for ease of access, reporting and evaluation. These  
15 classifications arose from unique circumstances where  
16 particular types of measures were affected by code changes  
17 or projects requiring transition management due to tariff  
18 updates. Avista will carefully consider identification of  
19 such items in order to accommodate ease of reporting and  
20 evaluating when these unique situations occur in the  
21 future.



1           Q.    Do the findings of the Cadmus Report suggest  
2 that the energy-efficiency programs operated by the  
3 Company are not cost effective or are imprudently managed?

4           A.    No. For over 35 years Avista has had a  
5 significant and consistent commitment to energy  
6 efficiency. The Company's energy efficiency programs have  
7 been very successful offering a broad array of efficiency  
8 measures. The energy efficiency program is designed and  
9 implemented, with input from the Advisory Group, to  
10 provide customers with the means to effectively implement  
11 meaningful energy efficiency measures, in a cost-effective  
12 manner. Participating customers have benefited through  
13 lower bills. Non-participating customers have benefited  
14 from the Company having acquired lower cost resources in  
15 the form of DSM, as well as maintaining the energy  
16 efficiency message and infrastructure for the benefit of  
17 our service territory.

18           The purpose of the Impact and Process evaluation is  
19 intended to independently verify "claimed" savings and  
20 review procedures and implementation of programs for  
21 continual improvement. Avista has made, and will continue

1 to make, improvements in its energy efficiency programs  
2 based on the recent, and future EM&V evaluations.

3 Q. Does this complete your pre-filed direct  
4 testimony?

5 A. Yes.