

In the Matter Of:

ACT vs

Puget Sound Clean Air Agency

BLAKE LITTAUER

December 16, 2020



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| <p style="text-align: center;">1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">POLLUTION CONTROL HEARINGS BOARD STATE OF WASHINGTON</p> <p>-----</p> <p>ADVOCATES FOR A CLEANER TACOMA, SIERRA CLUB, WASHINGTON ENVIRONMENTAL COUNCIL, WASHINGTON PHYSICIANS FOR SOCIAL RESPONSIBILITY, STAND.EARTH, AND THE PUYALLUP TRIBE OF INDIANS,</p> <p style="text-align: center;">Appellants,</p> <p style="text-align: right;">PHCB NO. P19-087C</p> <p style="text-align: center;">-vs-</p> <p>PUGET SOUND CLEAN AIR AGENCY, PUGET SOUND ENERGY, INC., Respondents.</p> <p>-----</p> <p style="text-align: center;">RULE 30(b)(6) REMOTE VIDEOTAPED DEPOSITION OF BLAKE LITTAUER December 16, 2020</p> <p>Job No. 2020-767013 Reported by: Amy L. Larson, RPR</p> | <p style="text-align: center;">1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>APPEARANCES:</p> <p>Counsel for Appellants Advocates For A Cleaner Tacoma; Sierra Club; WA Environmental Council; WA Physicians For Social Responsibility; And Stand.Earth:</p> <p>Jan Hasselman, Esquire jhasselman@earthjustice.org Jaimini Parekh, Esquire jparekh@earthjustice.org Earthjustice 810 Third Avenue, Suite 610 Seattle, WA 98104</p> <p>Co-Counsel for Puget Sound Energy, Inc.:</p> <p>Joshua B. Frank, Esquire joshua.frank@bakerbotts.com Sterling Marchand, Esquire sterling.marchand@bakerbotts.com Baker Botts 700 K Street NW Washington, D.C. 20001</p> <p>Counsel for Respondent Puget Sound Energy, Inc.: Tadas A. Kisielius, Esquire tak@vnf.com</p> <p>Sara Leverage, Esquire sleverage@vnf.com Van Ness Feldman, LLP 719 Second Avenue, Suite 1150 Seattle, WA 98104 Counsel for Appellant The Puyallup Tribe of Indians:</p> <p>Geoff J.M. Bridgman, Esquire gbridgman@omwlaw.com Nicholas Thomas, Esq. nthomas@omwlaw.com Ogden Murphy Wallace, PLLC 901 5th Avenue, Suite 3500 Seattle, WA 98164</p> |
| <p style="text-align: center;">1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">RULE 30(b)(6) REMOTE VIDEOTAPED DEPOSITION OF BLAKE LITTAUER, taken on this 16th day of December, 2020, commencing at approximately 1:40 p.m., reported stenographically by Amy L. Larson, a Registered Professional Reporter and Notary Public.</p> | <p style="text-align: center;">1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>APPEARANCES: (Cont'd.)</p> <p>Counsel for Puget Sound Clean Air Agency:</p> <p>Jennifer Dold, Esquire jenniferd@psccleanair.gov</p> <p>Jennifer Elias, Esquire jenniferE@psccleanair.gov</p> <p>Puget Sound Clean Air Agency 1904 3rd Avenue, Suite 105 Seattle, WA 98101</p> <p>Co-Counsel for the Puyallup Tribe of Indians:</p> <p>Lisa A. Anderson, Esquire lisa.anderson@puyalluptribe-nsn.gov</p> <p>Law Office, Puyallup Indian Tribe 3009 East Portland Avenue Tacoma, WA 98404</p> <p>ALSO PRESENT: Lorna Luebbe, Esquire Ed Caswell, IV, Videographer</p> |

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| <p style="text-align: right;">5</p> <p>1 INDEX:</p> <p>2 EXAMINATION BY: PAGE</p> <p>3 Mr. Hasselman.....9</p> <p>4 NO EXHIBITS MARKED FOR IDENTIFICATION</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> | <p style="text-align: right;">7</p> <p>1 THE COURT REPORTER: Before we</p> <p>2 begin, I have a short read-on.</p> <p>3 The attorneys participating in this</p> <p>4 proceeding acknowledged that I am not</p> <p>5 physically present in the proceeding room and</p> <p>6 that I will be reporting this proceeding</p> <p>7 remotely.</p> <p>8 They further acknowledge that in</p> <p>9 lieu of an oath administered in person, the</p> <p>10 witness will verbally declare his testimony</p> <p>11 in this matter is under penalty of perjury.</p> <p>12 The parties and their counsel</p> <p>13 consent to this arrangement and waive any</p> <p>14 objections to this manner of reporting.</p> <p>15 Please indicate your agreement by</p> <p>16 stating your name and your agreement on the</p> <p>17 record beginning with the taking attorney.</p> <p>18 MR. HASSELMAN: I confirm my</p> <p>19 agreement. This is Jan Hasselman.</p> <p>20 MR. KISIELIUS: This is</p> <p>21 Tadas Kisielius with Van Ness Feldman on</p> <p>22 behalf of Puget Sound Energy. I also</p> <p>23 confirm.</p> <p>24 MS. ELIAS: This is Jennifer Elias</p> <p>25 for Puget Sound Clean Air Agency.</p> |
| <p style="text-align: right;">6</p> <p>1 PROCEEDINGS</p> <p>2</p> <p>3 THE VIDEOGRAPHER: We're on the</p> <p>4 record. My name is Ed Caswell, IV. I'm the</p> <p>5 videographer retained by Lexitas reporter</p> <p>6 [sic]. Today's date is December 16th, 2020.</p> <p>7 The time is 1:40. This is a Zoom conference</p> <p>8 in matter of ACT vs. PSCAA.</p> <p>9 The deponent is -- say your name,</p> <p>10 sir.</p> <p>11 THE WITNESS: Blake Littauer.</p> <p>12 THE VIDEOGRAPHER: Okay. You can</p> <p>13 swear in the witness now.</p> <p>14 Oh, before you swear, make your</p> <p>15 statement, sir.</p> <p>16 MR. BRIDGMAN: Yes, this is</p> <p>17 Geoff Bridgman with the law firm of</p> <p>18 Ogden, Murphy & Wallace representing the</p> <p>19 Puyallup Tribe of Indians. We will not be</p> <p>20 asking questions at this deposition and</p> <p>21 reserve the right to call this witness at a</p> <p>22 later date for reasons that are -- all</p> <p>23 counsel are aware of as a result of e-mail</p> <p>24 exchanges.</p> <p>25 Thank you so much.</p> | <p style="text-align: right;">8</p> <p>1 MR. KISIELIUS: Ms. Elias, I think</p> <p>2 she wants you to confirm your agreement to</p> <p>3 the --</p> <p>4 MS. ELIAS: Yeah, pardon me. We</p> <p>5 confirm.</p> <p>6 MR. BRIDGMAN: Geoff Bridgman on</p> <p>7 behalf of Puyallup Tribe of Indians, we</p> <p>8 affirm.</p> <p>9 MR. KISIELIUS: And Madam Court</p> <p>10 Reporter, since this is a new deposition, do</p> <p>11 you want full introductions of the -- of the</p> <p>12 counsel that's present for the deposition?</p> <p>13 THE COURT REPORTER: Please.</p> <p>14 MR. HASSELMAN: Okay.</p> <p>15 Jan Hasselman with the law firm Earthjustice</p> <p>16 on behalf of the Advocates for a Cleaner</p> <p>17 Tacoma.</p> <p>18 MR. KISIELIUS: And Tadas</p> <p>19 Kisielius with Van Ness Feldman on behalf of</p> <p>20 Puget Sound Energy. With me is co-counsel</p> <p>21 Joshua Frank from Baker Botts, and also</p> <p>22 Sara Leverette from Van Ness Feldman, and</p> <p>23 also Lorna Luebbe from Puget Sound Energy.</p> <p>24 MR. BRIDGMAN: Geoff Bridgman with</p> <p>25 the law firm of Ogden Murphy Wallace, also</p> |

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| <p>1 accompanying by video is my partner 2 Nick Thomas. We are both here on behalf 3 Puyallup Tribe of Indians, and Lisa Anderson 4 with the law offices located at Puyallup 5 Tribe of Indians. 6 MS. ELIAS: Jennifer Elias with 7 the Puget Sound Clean Air Agency. 8 9 BLAKE LITTAUER, 10 a witness in the above-entitled action, 11 after having been first duly sworn, was 12 deposed and says as follows: 13 14 EXAMINATION 15 BY MR. HASSELMAN: 16 Q. Good morning, Mr. Littauer. Again, my name 17 is Jan Hasselman. I'm an attorney for 18 Advocates for Clean Air Tacoma. So I 19 appreciate you being here. 20 Were you listening in to the 21 previous deposition that happened this 22 morning? 23 A. I was not. 24 Q. Okay. Well, let me go through some quick 25 ground rules for the deposition.</p> | 9 | <p>1 responsibilities? 2 A. As a business development director, my job is 3 to sell LNG fuel from the -- 4 THE COURT REPORTER: I'm sorry, 5 I'm not hearing your audio clearly. I think 6 we may need to take a break and have you call 7 in. 8 MR. HASSELMAN: Let's -- let's 9 maybe try -- because he was pretty far from 10 the computer. Can we take another crack at 11 that -- 12 THE COURT REPORTER: Sure. 13 MR. HASSELMAN: -- just closer to 14 the computer. 15 THE WITNESS: Director of business 16 development, my job is to sell LNG fuel from 17 the -- from the plant. 18 MR. HASSELMAN: Ms. Larson, is 19 that okay by you or do you want to try the 20 sound? 21 THE COURT REPORTER: It's a little 22 better. We can try and see. 23 MR. HASSELMAN: Okay. Just speak 24 up if you're not -- if you're not catching 25 it.</p> | 11 |
| <p>1 Have you had your deposition taken 2 before? 3 A. I have not. 4 Q. So a couple of things to be sure about. 5 The primary thing is to make sure 6 that your answers are -- are clearly verbally 7 stated. Saying "uh-huh" or shaking your head 8 is not going to come through on the written 9 transcripts, so try to go with "yes" or "no." 10 If any question I ask is not clear 11 to you, please ask me to clarify, I'm happy 12 to do that. 13 If you think of anything else in 14 the -- that you want to add to a previous 15 answer as we go through the conversation, 16 you're welcome at any time to go back and 17 supplement or change a previous answer. 18 And, finally, any time you need a 19 break, just speak up, happy to give you a 20 break. I don't anticipate having you here 21 very long, so hopefully we won't need one, 22 but just speak up if you do. 23 Does that all sound good? 24 A. It does. 25 Q. So can you start by describing your job</p> | 10 | <p>1 BY MR. HASSELMAN: 2 Q. Who is your employer? 3 A. Puget Sound Energy. 4 Q. Okay. How long have you been with PSE? 5 A. A little over three months. I started on 6 September 8th, 2020. 7 Q. Okay. And where did you come from previous 8 to your employment with PSE? 9 A. A company called Clean Energy. 10 Q. Tell me a little bit about that. 11 A. Clean Energy, I was with them for about 12 12 years. Primary responsibilities were 13 selling fuel, natural gas as a transportation 14 fuel for over-the-road transportation 15 customers, as well as bulk LNG. 16 Q. And so the -- do you have any other tasks 17 besides finding customers for the LNG that is 18 produced by this facility? 19 A. I do not. 20 Q. And can you tell me what you did to prepare 21 for the deposition this morning? 22 A. I spoke to our -- our legal counsel, as well 23 as reviewed some of the prior work from my 24 predecessor. 25 Q. Who was your predecessor?</p> | 12 |

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| 13 | <p>1 A. A gentleman named Jonathan Harris.</p> <p>2 Q. And he had the same job title and same job</p> <p>3 responsibilities?</p> <p>4 A. Similar -- similar. He was -- his job title</p> <p>5 was business development manager. Job</p> <p>6 responsibilities were -- were similar as well</p> <p>7 where he was also tasked with selling LNG</p> <p>8 from the plant once -- once opened.</p> <p>9 Q. Okay. And when you say you reviewed some of</p> <p>10 his materials, what did that include?</p> <p>11 A. I spoke to Jonathan about some of the</p> <p>12 customers that he spoken to in the past, some</p> <p>13 agreements that -- nondisclosure agreements</p> <p>14 that were signed, as well as some pricing</p> <p>15 proposals that were given to customers in the</p> <p>16 past few years.</p> <p>17 Q. Do you have access to his e-mails and</p> <p>18 correspondence?</p> <p>19 A. I do not. I have access to the files that</p> <p>20 were saved.</p> <p>21 Q. And it sounds like you can pick up the phone</p> <p>22 and ask him a question if that comes up; is</p> <p>23 that right?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. So I'm going to ask you some questions</p> | 15 |
| 14 | <p>1 that you might not have personal knowledge</p> <p>2 because they predate your -- your tenure, and</p> <p>3 so I'll ask to the extent that you know based</p> <p>4 on your review of -- of the documents.</p> <p>5 Is that okay?</p> <p>6 A. Okay.</p> <p>7 Q. So when -- to your knowledge, when did PSE</p> <p>8 start the conversation with TOTE Marine about</p> <p>9 providing LNG for their ships?</p> <p>10 MR. KISIELIUS: I'm going to --</p> <p>11 I'm just going to interject here with an</p> <p>12 objection on the scope of the 30(b)(6), which</p> <p>13 is about potential customers under topic 11</p> <p>14 as specified in the notice.</p> <p>15 So Mr. Littauer is not here to talk</p> <p>16 about the TOTE contract. And so, again, I</p> <p>17 think we're focused on the specific topic as</p> <p>18 clarified -- first as specified in the notice</p> <p>19 and then as clarified through subsequent</p> <p>20 correspondence with counsel.</p> <p>21 MR. HASSELMAN: Okay. And this</p> <p>22 is -- this is some word parsing, but I view</p> <p>23 potential customers as including TOTE since</p> <p>24 the facility isn't yet built. I guess that's</p> <p>25 what I -- I meant by that. So I'm going to</p> | 16 |
| 15 | <p>1 ask questions about TOTE.</p> <p>2 MR. KISIELIUS: And I guess to the</p> <p>3 extent that -- and this is exactly why we</p> <p>4 were seeking clarification repeatedly is</p> <p>5 precisely to avoid this circumstance.</p> <p>6 So Mr. -- you're free to ask him,</p> <p>7 he'd be speaking in his personal capacity at</p> <p>8 that point based on his personal knowledge,</p> <p>9 not binding on the company.</p> <p>10 MR. HASSELMAN: Okay.</p> <p>11 BY MR. HASSELMAN:</p> <p>12 Q. So when -- to the best of your knowledge,</p> <p>13 when did the conversation start with TOTE?</p> <p>14 A. I'm not familiar when that started.</p> <p>15 Q. Has -- are you now in the -- having direct</p> <p>16 conversations with TOTE Marine as part of</p> <p>17 your job responsibility?</p> <p>18 A. Yes.</p> <p>19 Q. And what do those conversations encompass?</p> <p>20 A. We are currently looking to finalize some</p> <p>21 details on our contract.</p> <p>22 Q. And what contract is that?</p> <p>23 A. The LNG fueling contract.</p> <p>24 Q. So there is -- is it the case that there is</p> <p>25 no contract yet with TOTE Marine?</p> | 17 |
| 16 | <p>1 A. There is a contract and we are working to</p> <p>2 amend that contract currently.</p> <p>3 Q. Okay. And what does the amendment encompass?</p> <p>4 A. Some different pricing terms.</p> <p>5 Q. Is that -- is that all?</p> <p>6 A. For the most part. There are some other</p> <p>7 delays in when they would bring on their ship</p> <p>8 initially. They were initially supposed to</p> <p>9 bring on their ship first quarter of '21.</p> <p>10 That's been delayed for about a year, and so</p> <p>11 we're working through some -- some details</p> <p>12 surrounding that delay, as well as, I guess,</p> <p>13 some financial details as well.</p> <p>14 Q. Can you tell me a little more about --</p> <p>15 MR. KISIELIUS: Sorry, just to --</p> <p>16 MR. HASSELMAN: Go ahead.</p> <p>17 MR. KISIELIUS: -- offer an</p> <p>18 objection to the extent, again, with the, I</p> <p>19 think, different line of questioning. I want</p> <p>20 to be clear that this -- this testimony that</p> <p>21 he's offering may need to be marked as</p> <p>22 confidential and subject to the protective</p> <p>23 order that we've signed, so I'm marking that</p> <p>24 for the record to the extent that they deal</p> <p>25 with ongoing negotiations that may governed</p> | 18 |

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| 17 | <p>1 by a nondisclosure agreement.</p> <p>2 MR. HASSELMAN: I understand, and</p> <p>3 maybe let's just get that on the record.</p> <p>4 BY MR. HASSELMAN:</p> <p>5 Q. Is there a nondisclosure agreement that</p> <p>6 applies to the negotiations around this</p> <p>7 contract?</p> <p>8 A. Not that I'm aware of.</p> <p>9 Q. So can you tell me a little bit more about</p> <p>10 this delay. When you say, "Bring on the</p> <p>11 ships," I assume that means complete the</p> <p>12 conversion to natural gas; is that correct?</p> <p>13 A. Correct.</p> <p>14 Q. So what -- what's the occasion for the delay</p> <p>15 in the conversion?</p> <p>16 A. Apparently there are some restrictions, some</p> <p>17 COVID-type restrictions that are delaying</p> <p>18 personnel coming over from Europe to Canada,</p> <p>19 which is where the conversions will be taking</p> <p>20 place. And so those restrictions have caused</p> <p>21 TOTE a delay in their project schedule.</p> <p>22 Q. Okay. And I had been under the impression</p> <p>23 that the conversion was a -- was a process</p> <p>24 that had already started and was underway.</p> <p>25 Is that not -- is that not the case?</p> | 19 |
| 18 | <p>1 A. That's not.</p> <p>2 Q. Okay. And what's the current anticipated</p> <p>3 completion date for the conversion?</p> <p>4 A. We are hoping that we are looking at the end</p> <p>5 of the first quarter of '22.</p> <p>6 Q. And this may sound obvious, but presumably,</p> <p>7 until that conversion is complete, you would</p> <p>8 not be selling any LNG to TOTE Marine; is</p> <p>9 that correct?</p> <p>10 A. Correct.</p> <p>11 Q. Do you have an understanding of why TOTE</p> <p>12 wanted to reach a contract with PSE on</p> <p>13 providing LNG at this facility? In other</p> <p>14 words, why did -- why did TOTE want LNG?</p> <p>15 A. I don't know.</p> <p>16 Q. That hasn't come up in your discussions with</p> <p>17 them?</p> <p>18 A. No.</p> <p>19 Q. Are there other sources of LNG between Tacoma</p> <p>20 and -- and Alaska that you're aware of?</p> <p>21 A. There is an LNG plant in Vancouver that could</p> <p>22 deliver LNG to a ship via a truck, unloading</p> <p>23 LNG via a truck.</p> <p>24 Q. Is that the only one that you're aware of?</p> <p>25 A. Yes.</p> | 20 |
| 17 | <p>1 Q. When the conversion is complete, is it the</p> <p>2 case that TOTE can run off either LNG or</p> <p>3 conventional fuel; is that right?</p> <p>4 A. Yes.</p> <p>5 Q. I'm sorry, I didn't catch your answer.</p> <p>6 A. Yes.</p> <p>7 Q. Do you know what the advantages for TOTE are</p> <p>8 of running off LNG?</p> <p>9 MR. KISIELIUS: Objection;</p> <p>10 foundation. Again, and I want to reiterate</p> <p>11 my objection to the questions as exceeding</p> <p>12 the scope of the 30(b)(6) testimony.</p> <p>13 But Mr. Littauer, you can answer to</p> <p>14 the best of your ability.</p> <p>15 THE WITNESS: Repeat your</p> <p>16 question, please.</p> <p>17 BY MR. HASSELMAN:</p> <p>18 Q. Do you know what the advantages for TOTE of</p> <p>19 running off LNG is as opposed to conventional</p> <p>20 fuel are?</p> <p>21 A. As a sales guy, my job is to sell the</p> <p>22 advantages of LNG. And so I sell that LNG</p> <p>23 provides greenhouse gas emissions reduction,</p> <p>24 as well as pricing benefits to the end user.</p> <p>25 As far as what TOTE's</p> | 19 |
| 18 | <p>1 decision-making process was, I'm not -- I'm</p> <p>2 not aware.</p> <p>3 Q. Okay. I want to shift to other potential</p> <p>4 marine customers. It is the case that the</p> <p>5 project anticipates finding other marine</p> <p>6 customers besides TOTE; is that true?</p> <p>7 A. Yes.</p> <p>8 Q. And what's the basis for the company's belief</p> <p>9 that there -- there will be other marine</p> <p>10 customers?</p> <p>11 A. Would you mind clarifying that, the basis for</p> <p>12 their belief?</p> <p>13 Q. Well, a very big extensive project was built</p> <p>14 with a substantial amount of fuel that it</p> <p>15 generates intended to provide fuel for -- for</p> <p>16 other vessels besides TOTE.</p> <p>17 And my question is: Why do you</p> <p>18 believe that there are other customers out</p> <p>19 there besides TOTE? For example, are you</p> <p>20 talking to other potential customers?</p> <p>21 A. I am.</p> <p>22 Q. Okay. So I want to get the complete basis</p> <p>23 for your -- the belief that there is other</p> <p>24 potential customers out there.</p> <p>25 Is there a market analysis that</p> | 20 |

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| <p style="text-align: right;">21</p> <p>1 you're aware of?</p> <p>2 A. There is not.</p> <p>3 Q. Okay. And so tell me about the conversations</p> <p>4 with potential customers then, please?</p> <p>5 A. The conversations are -- are, at this point,</p> <p>6 a lot of cold calls into -- into maritime</p> <p>7 customers that call on the Port of Tacoma and</p> <p>8 seeing if there's interest on their behalf on</p> <p>9 bringing an LNG fuel vessel to the Port of</p> <p>10 Tacoma.</p> <p>11 Q. So when you say, "Phone calls," who is making</p> <p>12 the phone calls? Is this you looking for</p> <p>13 customers?</p> <p>14 A. To clarify, a cold call at this point is</p> <p>15 mostly e-mails, and so those are e-mail</p> <p>16 exchanges back and forth that we would look</p> <p>17 to set up a -- a phone call or a video call,</p> <p>18 and that would be outbound from me to the</p> <p>19 customers that I find data mining online.</p> <p>20 Q. Okay. So what's the current state of those</p> <p>21 discussions? In other words, are you just in</p> <p>22 the cold calling state or are there other</p> <p>23 customers that you are in contract</p> <p>24 negotiations with to provide marine fuel?</p> <p>25 A. We are in no other -- we have no other</p> | <p style="text-align: right;">23</p> <p>1 Q. You're also seeking customers for trucks?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And one thing that I'm a little</p> <p>4 confused about, we talked to your colleague,</p> <p>5 Mr. Hogan the other day, and he said that the</p> <p>6 truck-loading facilities are not to provide</p> <p>7 fuel for LNG power trucks, but to fill up</p> <p>8 LNG's cargo for trucks.</p> <p>9 Is that correct? Is that your</p> <p>10 understanding too?</p> <p>11 A. It's my understanding that the -- that an end</p> <p>12 user, so a truck driver, would not come to</p> <p>13 the truck rack to fuel his rig as propulsion.</p> <p>14 Q. Right.</p> <p>15 A. A trailer, a 10,000-gallon trailer would fill</p> <p>16 up at the truck rack and for delivery to a</p> <p>17 fueling station where it would be then</p> <p>18 dispensed into vehicles.</p> <p>19 Q. Okay. So when you're filling up a -- the</p> <p>20 trailer, the cargo trailer, is there anything</p> <p>21 about that that limits the use of the fuel in</p> <p>22 that trailer to vehicles? In other words,</p> <p>23 could it be used for -- for other -- other</p> <p>24 applications?</p> <p>25 A. Our air permits requires that our end</p> |
| <p style="text-align: right;">22</p> <p>1 contracts with customers to provide fuel.</p> <p>2 All -- all calls are extremely preliminary</p> <p>3 and haven't gone beyond the factfinding</p> <p>4 stage.</p> <p>5 Q. So assuming that this facility goes online</p> <p>6 next year, do you anticipate having other --</p> <p>7 do you anticipate having any customers for</p> <p>8 marine fuel when it goes online?</p> <p>9 A. I'd love to tell you absolutely, yes.</p> <p>10 Unfortunately, no. Especially with TOTE's</p> <p>11 delay, I don't anticipate, 2021, fueling a</p> <p>12 customer at this point.</p> <p>13 Q. So do you have -- and this might be -- as a</p> <p>14 business development person you might not</p> <p>15 know this, but if the demand is not there on</p> <p>16 the marine fuel side, will the facility be</p> <p>17 making 250,000 gallons of LNG a day?</p> <p>18 A. I'm not aware how that would work on the</p> <p>19 plant production side.</p> <p>20 Q. Okay. I want to talk about trucking</p> <p>21 customers.</p> <p>22 So one thing that -- is that</p> <p>23 something that you are responsible for in</p> <p>24 your business development role?</p> <p>25 A. Yes.</p> | <p style="text-align: right;">24</p> <p>1 customer is a transportation customer.</p> <p>2 Q. So in your understanding, if you put fuel in</p> <p>3 a truck, it can be only used on a vehicle; is</p> <p>4 that correct?</p> <p>5 MR. KISIELIUS: I'm going to offer</p> <p>6 another objection here. Again, outside the</p> <p>7 scope of the 30(b)(6). We had other</p> <p>8 witnesses testify to the physical permitting</p> <p>9 limitations on the facility. Mr. Littauer is</p> <p>10 here to talk about potential customers. This</p> <p>11 is getting into territory outside of the</p> <p>12 30(b)(6) topic.</p> <p>13 MR. HASSELMAN: And I'm just</p> <p>14 trying to get the potential customers.</p> <p>15 BY MR. HASSELMAN:</p> <p>16 Q. So, again, is it your understanding that if</p> <p>17 it's put on the truck, the only potential</p> <p>18 customer for the use of that fuel would be</p> <p>19 for vehicle propulsion?</p> <p>20 A. That's my understanding.</p> <p>21 Q. Do you have some existing contracts to</p> <p>22 provide fuel to load on to trucks?</p> <p>23 A. We have an existing customer, Potelco. Their</p> <p>24 end use will be vehicular fuel.</p> <p>25 Q. Tell me a little bit more about that. How</p> |

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| 25 | <p>1 much is involved? How much -- how much LNG?</p> <p>2 A. We are estimating about a million gallons of</p> <p>3 fuel, LNG gallons of fuel per year.</p> <p>4 Q. Any other contracts for customers on that</p> <p>5 side?</p> <p>6 A. No.</p> <p>7 Q. Are you doing any active marketing on --</p> <p>8 to -- to potential customers?</p> <p>9 A. No.</p> <p>10 Q. How come?</p> <p>11 A. It's extremely miniscule, the fuel usage.</p> <p>12 For example, like, I estimate that the -- the</p> <p>13 fueling from the truck rack is going to be</p> <p>14 less than 1 percent of -- once we can</p> <p>15 theoretically sell out fuel from the plant.</p> <p>16 Truck rack fueling would really be less than</p> <p>17 1 percent of the take from the -- from the</p> <p>18 plant.</p> <p>19 Q. And is that because of the physical</p> <p>20 limitations on loading any more than that?</p> <p>21 A. It -- it's not. What -- it's just due to the</p> <p>22 fact that the demand on the over-the-road</p> <p>23 transportation side, it's -- it's more of a</p> <p>24 shotgun approach on sales. Where</p> <p>25 theoretically, you know, you can -- you can</p> | 27 | <p>1 customer.</p> <p>2 Q. Are you discussing more with other customers?</p> <p>3 A. No.</p> <p>4 Q. Okay. Have there been any draft -- I'm just</p> <p>5 trying to get a sense of how far along in the</p> <p>6 discussions -- previously you had said this</p> <p>7 is all very preliminary.</p> <p>8 Have there been any draft contracts</p> <p>9 exchanged with potential customers?</p> <p>10 A. No.</p> <p>11 Q. Do you know how many vessels that are -- are</p> <p>12 based in or transit through Tacoma have the</p> <p>13 capacity to fuel at the facility?</p> <p>14 A. No.</p> <p>15 Q. Do you know how -- you know, what portion of</p> <p>16 vessels that -- that are in Puget Sound,</p> <p>17 have -- have the current technology to use</p> <p>18 LNG?</p> <p>19 A. Currently, I believe the answer is zero.</p> <p>20 Q. So when you're reaching out to potential</p> <p>21 customers, are you seeking to persuade them</p> <p>22 to convert or to -- if they don't have the</p> <p>23 capacity to use the fuel, how do you approach</p> <p>24 someone that they should be a customer?</p> <p>25 A. At this point, again, this is more</p> |
| 26 | <p>1 call on all sorts of trucking fleets in and</p> <p>2 around that area. Making the sale line up</p> <p>3 is -- is hard.</p> <p>4 I spent my previous role with</p> <p>5 Clean Energy of doing just that. It's a</p> <p>6 tough sale where the maritime customer is a</p> <p>7 lot more focused, a lot more streamlined, and</p> <p>8 that where you would be able to see the</p> <p>9 fruits of our labor with the largest volume</p> <p>10 coming from sales.</p> <p>11 Q. Okay. So you are not actively seeking</p> <p>12 additional trucking customers besides Potelco</p> <p>13 at this time, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And you don't anticipate shifting focus to do</p> <p>16 that?</p> <p>17 A. I really don't at this point.</p> <p>18 Q. With respect to the marine customers, have</p> <p>19 you identified -- have you entered into any</p> <p>20 confidentiality agreements with potential</p> <p>21 customers?</p> <p>22 A. Nondisclosure agreements, yes.</p> <p>23 Q. Okay. How many?</p> <p>24 A. We have entered into -- I've entered into one</p> <p>25 nondisclosure agreement with a maritime</p> | 28 | <p>1 fact-finding, so we are seeing if companies</p> <p>2 are looking to bring LNG fuel vessels to</p> <p>3 their fleet, understanding that a ship takes</p> <p>4 a couple of years to build.</p> <p>5 So at this point, our sale cycle is</p> <p>6 going to be at least two years long, two</p> <p>7 years plus, to bring on a new shipping</p> <p>8 customer to Pacific Northwest.</p> <p>9 So at this point, before we're open,</p> <p>10 we are doing a lot of exploratory work to see</p> <p>11 what fleets, what shipping lines, what</p> <p>12 shipping fleets are bringing on LNG fuel</p> <p>13 ships or planning to in the near future.</p> <p>14 Q. Are there any other potential applications</p> <p>15 for the fuel from this facility that you're</p> <p>16 aware of?</p> <p>17 We have fuel for TOTE vessels, fuel</p> <p>18 for potential other marine vessels, and fuel</p> <p>19 for truck cargo.</p> <p>20 Are there any other potential uses</p> <p>21 of -- or applications for the fuel from this</p> <p>22 facility?</p> <p>23 A. There are potential uses, however, our air</p> <p>24 permit will not allow for that.</p> <p>25 Q. Well, leave aside the permits for a second.</p> |

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| 29 | <p>1 What are other potential uses?</p> <p>2 A. LNG can be used as fuel wherever natural gas</p> <p>3 is used for fuel. So it can be used for</p> <p>4 remote power generation. It can be used in</p> <p>5 greenhouses that don't have access to natural</p> <p>6 gas, pipelines. It can be used as mining</p> <p>7 applications, industrial plants, asphalt</p> <p>8 plants. A lot -- a lot of industrial</p> <p>9 applications is as a use of LNG.</p> <p>10 But, again, we're not looking to do</p> <p>11 those opportunities.</p> <p>12 Q. Okay. So you're not in conversations with</p> <p>13 anybody on -- on -- outside of the uses that</p> <p>14 I listed, you're not in conversations with</p> <p>15 anybody about selling LNG?</p> <p>16 A. We're not in active conversations, no.</p> <p>17 Q. Are -- bear with me for a second.</p> <p>18 Have you ever heard any -- anyone</p> <p>19 discuss potentially selling LNG to the</p> <p>20 WestRock facility?</p> <p>21 A. I'm not familiar with WestRock, no.</p> <p>22 Q. How about LNG for trains, being loaded onto</p> <p>23 trains?</p> <p>24 A. Not loaded onto trains, no. LNG for train</p> <p>25 propulsion is a potential use of LNG,</p> | 31 | <p>1 the record, 2:28.</p> <p>2 Proceed.</p> <p>3 MR. HASSELMAN: Go ahead.</p> <p>4 THE WITNESS: Okay, thanks.</p> <p>5 When you asked about nondisclosure</p> <p>6 agreements that were signed with maritime</p> <p>7 customers, I interpreted that as a maritime</p> <p>8 end customer ship. I -- I should mention</p> <p>9 that we have nondisclosure agreements with</p> <p>10 bunker barge providers that, as a marketing</p> <p>11 person, I don't -- I don't consider them a</p> <p>12 maritime end customer.</p> <p>13 So we do have nondisclosure</p> <p>14 agreements in place that I wanted to make</p> <p>15 sure to get on the record.</p> <p>16 MR. HASSELMAN: Okay. Well, that</p> <p>17 seems consequential.</p> <p>18 BY MR. HASSELMAN:</p> <p>19 Q. When I was asking about marine customers, you</p> <p>20 were not including selling to bunker barges;</p> <p>21 is that correct?</p> <p>22 A. Correct. Correct. I -- I consider a</p> <p>23 maritime customer an end user that has a</p> <p>24 ship, a natural gas-fueled ship, that's what</p> <p>25 I consider a maritime customer.</p> |
| 30 | <p>1 however, engine feasibility at this time is</p> <p>2 not fully fleshed out.</p> <p>3 Q. Okay.</p> <p>4 MR. HASSELMAN: Tadas, I guess</p> <p>5 what -- I think I'm mostly done, but I was a</p> <p>6 little bit turned off by Mr. Littauer's</p> <p>7 recent arrival at the company, and I had some</p> <p>8 questions that he probably can't answer.</p> <p>9 What I'd like to do is take a -- a ten-minute</p> <p>10 break and go through my notes and think about</p> <p>11 if there's anything else I'd like to ask, and</p> <p>12 then if not, then we can conclude.</p> <p>13 Is that acceptable to everybody?</p> <p>14 MR. KISIELIUS: It -- it works for</p> <p>15 me, yes.</p> <p>16 MR. HASSELMAN: So why don't we</p> <p>17 come back at 11:25, and I'll either have a</p> <p>18 couple more quick questions or we'll be ready</p> <p>19 to wrap up.</p> <p>20 THE VIDEOGRAPHER: Okay. Are we</p> <p>21 off record for now?</p> <p>22 MR. HASSELMAN: Yes.</p> <p>23 MR. KISIELIUS: Yes.</p> <p>24 (Recess.)</p> <p>25 THE VIDEOGRAPHER: We're back on</p> | 32 | <p>1 We do have nondisclosure agreements</p> <p>2 with others that do not fit into that</p> <p>3 category.</p> <p>4 Q. Okay. And I was thinking of a maritime</p> <p>5 customer as a boat.</p> <p>6 So can you tell me a little bit more</p> <p>7 about these bunker barges, who they are and</p> <p>8 who are they serving? And I don't need to</p> <p>9 know names of companies. I just need to know</p> <p>10 what they're for.</p> <p>11 A. There are -- there were -- there are three</p> <p>12 bunker barge providers that I personally have</p> <p>13 signed nondisclosure agreements with.</p> <p>14 There are five others that nondisclosure</p> <p>15 agreements that were signed previously, and,</p> <p>16 again, that was primarily to keep proprietary</p> <p>17 information in-house amongst discussions, and</p> <p>18 again -- and preliminary discussions to</p> <p>19 protect the conversation.</p> <p>20 Q. Do you have -- yeah, what's -- what's the</p> <p>21 furthest along you are with any of these</p> <p>22 potential customers? In other words, are</p> <p>23 there draft contracts in the works?</p> <p>24 A. There are not.</p> <p>25 Q. And what -- what is the fuel going to be used</p> |

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| 33 | <p>1 for that is going on these bunker barges?</p> <p>2 A. We have not gotten to that position. We're</p> <p>3 only in the nondisclosure phase where we are</p> <p>4 discussing -- again, contemplate and</p> <p>5 discussing proprietary information that would</p> <p>6 not be disclosed to others. We have not gone</p> <p>7 beyond the exploratory phase with any of</p> <p>8 these customers.</p> <p>9 Of the eight maritime customers that</p> <p>10 we have signed nondisclosure agreements with,</p> <p>11 all but three are in active discussions.</p> <p>12 Q. So three are not active because for whatever</p> <p>13 reason they don't wish to go forward or you</p> <p>14 don't wish to go forward and there's no --</p> <p>15 there's no further conversation with three of</p> <p>16 the eight; is that what you mean?</p> <p>17 A. Yes. One second. We are -- we are only</p> <p>18 looking to go forward with continued</p> <p>19 conversations with -- with three at this</p> <p>20 point.</p> <p>21 Q. And are you saying that you do not know what</p> <p>22 they intend to use the fuel for?</p> <p>23 A. They would use the fuel ships with LNG,</p> <p>24 theoretically, once -- once we regressed</p> <p>25 within our power station.</p> | 35 | <p>1 deposition, Mr. Donahue distinguished between</p> <p>2 PSE and Puget LNG, which was, I guess, a</p> <p>3 separate corporate form.</p> <p>4 Is that something that you know</p> <p>5 about?</p> <p>6 A. Distinguish between PSE and PLNG and a</p> <p>7 corporate form that would delineate that?</p> <p>8 Q. Yeah.</p> <p>9 A. What form was he referring to?</p> <p>10 Q. Well, he was just distinguishing between the</p> <p>11 two -- the two corporate entities.</p> <p>12 A. Okay.</p> <p>13 Q. So are you aware that there are -- there's a</p> <p>14 separate corporate form for PLNG?</p> <p>15 A. Yes.</p> <p>16 Q. And is -- I just want to make sure I'm --</p> <p>17 like I said, I'm not missing something.</p> <p>18 Is there somebody else at Puget LNG</p> <p>19 that is out doing the same thing as you are?</p> <p>20 Or are you the person that's responsible for</p> <p>21 finding customers for the fuel for this</p> <p>22 facility?</p> <p>23 A. I've recently hired a sales and marketing</p> <p>24 manager. And she came up to Puget LNG on</p> <p>25 November 30th of this year, 2020.</p> |
| 34 | <p>1 Q. Okay. So the bunker barges, instead of</p> <p>2 fueling a ship directly, this is a contract</p> <p>3 to fuel a bunker barge that would then go</p> <p>4 someplace else and fuel a ship; is that what</p> <p>5 I understand?</p> <p>6 A. The bunker barge would be used to fuel a</p> <p>7 ship, correct.</p> <p>8 Q. Okay. And what is the document that you are</p> <p>9 referring to? I see you looking at a</p> <p>10 document and taking notes. What is that?</p> <p>11 A. I have a list of the nondisclosure agreements</p> <p>12 that were signed and other discussions that</p> <p>13 were made.</p> <p>14 Q. What is -- are you -- have you gotten to the</p> <p>15 point where you are discussing specific</p> <p>16 volumes of fuel?</p> <p>17 A. No.</p> <p>18 Q. So one -- one thing that I'm a little</p> <p>19 confused about by your testimony is that</p> <p>20 besides TOTE it doesn't appear that there are</p> <p>21 any potential customers -- or you're not very</p> <p>22 far along in identifying potential customers</p> <p>23 for the project, and I want to make sure that</p> <p>24 I'm not missing something.</p> <p>25 In the -- in the previous</p> | 36 | <p>1 Q. Okay. And is she -- you hired her. Does she</p> <p>2 work for you?</p> <p>3 A. Yes.</p> <p>4 Q. But you work for PSE?</p> <p>5 A. Correct.</p> <p>6 Q. And she works for Puget LNG?</p> <p>7 A. She also works for Puget Sound Energy.</p> <p>8 Q. I guess what I'm trying to get at is: Is she</p> <p>9 selling a different quantity of gas than --</p> <p>10 than you are? Are you both selling the same</p> <p>11 gas?</p> <p>12 A. We are both selling the same gas.</p> <p>13 Q. Okay. So to -- to put a fine point on my</p> <p>14 question, is there somebody else out there</p> <p>15 selling the same -- the LNG produced by this</p> <p>16 facility on behalf of a different corporate</p> <p>17 form than PSE?</p> <p>18 A. No.</p> <p>19 Q. Do you know why Puget Sound Energy built this</p> <p>20 facility without knowing whether it would</p> <p>21 have any customers?</p> <p>22 A. No.</p> <p>23 Q. And as part of your job as marketing or</p> <p>24 business director, when you are negotiating</p> <p>25 with customers, is part of what you negotiate</p> |

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| <p style="text-align: right;">37</p> <p>1 the price of the LNG? 2 A. Yes. 3 Q. And do you know the -- the price point at 4 which PSE would be selling gas at a loss as 5 opposed to a profit? 6 A. At this point, no. 7 Q. And -- and when -- it seems like it would be 8 challenging to negotiate a contract when you 9 don't know if it's profitable or not. 10 So how does that work? 11 A. We're not negotiating contracts currently. 12 Q. So you anticipate at some point knowing what 13 that price point is, I presume? 14 A. Yes. 15 Q. Have you received any direction or 16 information that would lead you to think that 17 PSE would be willing to sell LNG at a loss? 18 A. No. 19 Q. With respect to the marine customers that you 20 have had some initial outreach or 21 conversations with, do you know whether they 22 are -- would anticipate building new 23 LNG-powered vessels or whether they would be 24 buying existing ones or retrofitting? Has 25 that been part of the conversation?</p> | <p style="text-align: right;">39</p> <p>1 feasibility study that I'm aware of, but it 2 has nothing to do with, I believe, the -- how 3 I interpret your question was maritime 4 customers looking to transition their -- 5 their -- a ship or their fleet from -- to 6 natural gas. 7 BY MR. HASSELMAN: 8 Q. I appreciate the clarification. And just so 9 that I'm clear, your understanding is that 10 the bunker barges would be used for marine 11 fueling, not other applications; is that 12 correct? 13 A. Yes. 14 MR. HASSELMAN: Okay. I don't 15 have any further questions. Thank you for 16 your time. 17 THE WITNESS: Thank you. 18 THE VIDEOGRAPHER: This 19 concludes -- 20 MR. KISIELIUS: Before we go off 21 the record -- 22 THE VIDEOGRAPHER: Okay, we're 23 still on. 24 MR. KISIELIUS: Okay, great. I 25 understand from Mr. Bridgman's statement that</p> |
| <p style="text-align: right;">38</p> <p>1 A. No. 2 Q. Okay. And I just want to clarify for one 3 last time, as far as potential customers for 4 the LNG produced by this facility, outside of 5 marine vessels, trucks, and PSE customers, 6 are you aware of any other potential uses for 7 the LNG that are being considered? 8 A. Not that are being considered, no. 9 MR. HASSELMAN: Okay. That's it 10 for me. Thank you very much for your time. 11 THE WITNESS: I wanted to put one 12 more thing on the record. You asked about a 13 feasibility study for maritime customers 14 converting -- bringing LNG fuel to ships or 15 bringing ships to LNG, converting ships to 16 LNG, I do want to clarify, I am not aware of 17 any feasibility studies that we're looking at 18 the feasibility of transitioning of a ship 19 from diesel to LNG. 20 There is a feasibility study that we 21 worked with, worked on, that looked at the 22 feasibility of bringing on a bunker barge, a 23 third party to make an investment to bring on 24 a bunker barge for -- for fueling at the 25 Port of Tacoma. That -- that is a</p> | <p style="text-align: right;">40</p> <p>1 they won't be asking questions. I wanted to 2 give the Agency an opportunity if Ms. Elias 3 was planning on asking any. 4 MS. ELIAS: No, the Agency is not. 5 Thank you. 6 MR. KISIELIUS: And then I guess I 7 would ask just for a five-minute break to 8 convene real quickly and then come back on 9 the record at 11:46. 10 THE VIDEOGRAPHER: Okay. Going 11 off at 2:41. 12 (Recess.) 13 THE VIDEOGRAPHER: We're back on 14 the record 2:46. 15 MR. KISIELIUS: I -- I just -- I 16 appreciate the break. I just wanted to 17 double-check my notes here, but we have no 18 questions. We will reserve signature, so 19 read and sign, please. And I think we're 20 done. 21 THE VIDEOGRAPHER: Okay. Off the 22 record at 2:46. 23 (Deposition concluded at 2:46 p.m.) 24 25</p> |

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1 DEPOSITION CORRECTION SHEET

2 TITLE: Advocates for a Cleaner Tacoma, et al. vs.
Puget Sound Clean Air Agency, et al.

3 WITNESS: Blake Littauer

4 PAGE LINE DESIRED CHANGE

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3 I, Blake Littauer, have read this

4 deposition transcript and acknowledge

5 herein its accuracy except as noted:

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8 Witness Signature

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1 REPORTER'S CERTIFICATE

2

3 Be it known that I took the foregoing

4 remote deposition of Blake Littauer, on

5 December 16, 2020;

6

7 That I was then and there a notary public

8 and that by virtue thereof, I was duly authorized

9 to administer an oath;

10

11 That the witness was by me first duly

12 sworn to testify to the truth, the whole truth and

13 nothing but the truth relative to said cause;

14

15 That the foregoing transcript is a true

16 and correct transcript of my stenographic notes in

17 said matter;

18

19 That the witness reserved the right to

20 read and sign the transcript;

21 That I am not related to any of the

22 parties hereto, nor interested in the outcome of

23 the action;

24 WITNESS MY HAND AND SEAL this 28th day of

25 December, 2020.

Amy L. Larson

Amy L. Larson, RPR
My Commission Expires 01/31/25

| | | |
|---|---|---|
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