

**EXH. AW-5T
DOCKETS UE-190529/UG-190530
UE-190274/UG-190275
2019 PSE GENERAL RATE CASE
WITNESS: ANDREW WAPPLER**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**Docket UE-190529
Docket UG-190530(*Consolidated*)**

In the Matter of the Petition of

PUGET SOUND ENERGY

**For an Order Authorizing Deferral
Accounting and Ratemaking Treatment
for Short-life IT/Technology Investment**

**Docket UE-190274
Docket UG-190275 (*Consolidated*)**

PREFILED REBUTTAL TESTIMONY (NONCONFIDENTIAL) OF

ANDREW WAPPLER

ON BEHALF OF PUGET SOUND ENERGY

JANUARY 15, 2020

PUGET SOUND ENERGY

**PREFILED REBUTTAL TESTIMONY (NONCONFIDENTIAL) OF
ANDREW WAPPLER**

CONTENTS

I. INTRODUCTION1

II. PSE SUPPORTS PUBLIC COUNSEL’S RECOMMENDATION TO
REPORT ON THE IMPACT OF GET TO ZERO ON EFFORTS TO
PREVENT DISCONNECTION FOR NON-PAYMENT2

III. PSE REJECTS ALL OTHER PUBLIC COUNSEL
RECOMMENDATIONS SPONSORED BY MS. BALDWIN3

IV. PSE’S RESPONSE TO RECOMMENDATIONS BY THE ENERGY
PROJECT.....14

V. CONCLUSION.....19

1 **PUGET SOUND ENERGY**

2 **PREFILED REBUTTAL TESTIMONY (NONCONFIDENTIAL) OF**
3 **ANDREW WAPPLER**

4 **I. INTRODUCTION**

5 **Q. Are you the same Andrew Wappler who submitted prefiled direct testimony**
6 **on June 20, 2019, on behalf of Puget Sound Energy (“PSE” or the**
7 **“Company”) in this proceeding?**

8 A. Yes.

9 **Q. What is the purpose of your rebuttal testimony?**

10 A. The purpose of my rebuttal testimony is to address the information and
11 recommendations presented in the response testimony of Susan M. Baldwin, Exh.
12 SMB-1CT, on behalf of Public Counsel and Shawn M. Collins, Exh. SMC-1T, on
13 behalf of The Energy Project. Specifically, I will address several of Public
14 Counsel’s proposals regarding reporting, certain of PSE’s service quality indices
15 (“SQI”), creation of new working groups as well as address assertions related to
16 the digital fluency of PSE customers and that certain of PSE’s surveys are biased.
17 I will also address proposals by The Energy Project to develop a Disconnection
18 Reduction Plan, report on disconnection trends, increase community action
19 partnership (“CAP”) agency administrative fees for implementing PSE’s low
20 income program and require a “last visit” before disconnection for nonpayment.

1
2
3
4

**II. PSE SUPPORTS PUBLIC COUNSEL'S
RECOMMENDATION TO REPORT ON THE IMPACT OF GET
TO ZERO ON EFFORTS TO PREVENT DISCONNECTION FOR
NON-PAYMENT**

5 **Q. What reporting recommendations does Public Counsel make related the**
6 **impact of Get to Zero (“GTZ”) on disconnections for non-payment?**

7 A. Public Counsel, through its witness Ms. Baldwin, recommends that, in addition to
8 continuing to report on disconnections for non-payment, PSE should also report
9 on efforts to prevent disconnection such as participation in financial assistance
10 programs, field collections and deferred payment arrangements and that this
11 reporting should be conducted separately for digital and non-digital enrollments.¹

12 **Q. Does PSE agree with this recommendation?**

13 A. Yes. If the Commission would find the information helpful, PSE is supportive of
14 reporting participation in financial assistance programs, field collection, and
15 deferred payment arrangements, for both digital and non-digital enrollments. We
16 believe this data would enable increased utilization of the presently under-utilized
17 low-income energy assistance funding.

¹ Baldwin, Exh. SMB-1CT at 5:9-13.

1 **III. PSE REJECTS ALL OTHER PUBLIC COUNSEL**
2 **RECOMMENDATIONS SPONSORED BY MS. BALDWIN**

3 **Q. What other recommendations does Ms. Baldwin make on behalf of Public**
4 **Counsel?**

5 A. In addition to those that are addressed in the Prefiled Rebuttal Testimony of
6 Joshua J. Jacobs, Exh. JJJ-11T, PSE rejects all other recommendations made by
7 Ms. Baldwin on behalf of Public Counsel, including:

- 8 • recommending that the Commission consider modifying PSE’s SQI
9 metrics at some future time to measure service quality as customers
10 increasingly use digital channels to transact with PSE;²
- 11 • suggesting that it may be appropriate to design a new SQI metric that
12 specifically assesses the quality of interactive voice response (“IVR”)
13 transactions;³
- 14 • establishing a GTZ working group to determine how to best ensure that
15 the IVR is customer-friendly;⁴
- 16 • ensuring that GTZ benefits all customers, regardless of income, home
17 ownership, and demographics;⁵

² *Id.* at 5:1-3.

³ *Id.* at 5:4-6.

⁴ *Id.* at 5:6-8.

⁵ *Id.* at 6:1-2.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16

- directing PSE to coordinate with consumer stakeholder groups to ensure all customers adopt and benefit from self-help digital channels;⁶
- having PSE demonstrate that surveys submitted to the Commission and conducted by or on behalf of PSE are based on representative samples in terms of demographics and digital fluency;⁷
- recommending that the Commission revise the standard for PSE’s SQI 10 from 92 to 100 percent;⁸
- requiring the Company to provide an annual call-reason dashboard to Commission Staff and Public Counsel;⁹
- recommending the Commission evaluate PSE customer IVR experience;¹⁰
- recommending the Commission monitor PSE’s implementation of GTZ;¹¹
- requiring the Company to educate its customer base and facilitate a transition to digital platforms;¹²
- requiring the Company to facilitate a transition to digital platforms with agencies and institutions that serve the less digitally fluent, economically vulnerable and those with disabilities;¹³ and

⁶ *Id.* at 5:15-17.
⁷ *Id.* at 6:3-8.
⁸ *Id.* at 38:2-7
⁹ *Id.* at 15:6-9.
¹⁰ *Id.* at 15:17-20.
¹¹ *Id.* at 26:11-12.
¹² *Id.* at 26:13-16.
¹³ *Id.*

- 1 • requiring PSE to fully involve GTZ advisory committees to mitigate
- 2 risk;¹⁴
- 3 • recommending the GTZ working group consider a call-abandonment rate
- 4 SQI,¹⁵
- 5 • requiring the Company to report an average call-answering speed,¹⁶
- 6 • recommending the Commission explore whether the use of web-based
- 7 customer satisfaction surveys under-represents customers lacking digital
- 8 fluency,¹⁷
- 9 • recommending the Commission expand customer service metrics to
- 10 include measures related to customer bill payment assistance,¹⁸ and
- 11 • recommending the Commission direct the Company to provide copies of
- 12 all telephone scripts and training materials and to provide annual updates
- 13 if these materials are changed or updated.¹⁹

14 **Q. Why does PSE reject Public Counsel’s recommendation to update PSE’s**
15 **SQIs to reflect higher digital usage in the future?**

16 A. As noted by Public Counsel, the Company, like most service providers in both the
17 private and government sectors, is responding to customer demand for the option
18 of digital interactions as a normal course of everyday life in 2020. The decline in

¹⁴ *Id.* at 26:17.

¹⁵ *Id.* at 37:11-13.

¹⁶ *Id.* at 37:13-14.

¹⁷ *Id.* at 43:1-9.

¹⁸ *Id.* at 45:3-4.

¹⁹ *Id.* at 45:4-8.

1 live telephone call volumes and greater usage of the Company's digital service
2 options, including web, mobile and IVR, are clear evidence customers find these
3 tools satisfying. Public Counsel has failed to provide any specific basis, evidence
4 or data supporting this recommendation. The recommendation would be
5 burdensome to the Company and would require Customer-funded resources to be
6 developed and implemented speculatively.

7 **Q. Why does PSE reject Public Counsel's recommendation to design a new SQI**
8 **metric that assesses the quality of IVR transactions?**

9 A. Public Counsel noted the marked gains in IVR utilization.²⁰ This data indicates
10 customers are increasingly choosing this mode and find it satisfying. We believe a
11 new SQI should only be implemented when there are indications of a lag or
12 service deficiency, circumstances for which Public Counsel fails to provide any
13 specific data or evidence.

14 **Q. Why does PSE reject Public Counsel's recommendation to create a GTZ**
15 **work group?**

16 A. The issues Public Counsel suggests be addressed by this new group, such as
17 digital fluency, English proficiency and outreach, fall better fall under the
18 purview of the existing Low-Income Advisory Group, whose role could be
19 expanded to encompass these issues in relation to their impact on disadvantaged

²⁰ *Id.* at 8:9-9:3.

1 customers. A new and separate effort would not be a wise use of customer and
2 Company resources.

3 **Q. Why do you reject Public Counsel’s recommendation to ensure that GTZ**
4 **benefits all customers, regardless of income, home ownership and**
5 **demographics?**

6 A. Public Counsel’s recommendation fails to understand that the automation and
7 self-service improvements enabled by GTZ benefit all customers, whether they
8 are digital-first or prefer to utilize traditional telephone interaction with a
9 customer service representative. With the deployment of GTZ-related
10 technologies, customer service representatives now have greater access to more
11 accurate, timely and complete information when providing voice service to callers
12 in a wide-range of common interactions, including billing and payment, payment
13 arrangements, service stop, start or transfer, outage information and more. Public
14 Counsel makes an illogical and unfounded assertion that the digital foundation
15 implemented by the Company impacts only online, web and mobile service
16 platforms when it also provides customer service benefits to live agent telephone
17 services. Mr. Jacobs discusses this further in his rebuttal testimony, Exh. JJJ-11T.

18 **Q. Why does PSE reject Public Counsel’s recommendation for PSE to**
19 **coordinate with consumer stakeholder groups to ensure all customers adopt**
20 **and benefit from self-help digital channels?**

21 A. As noted above, Public Counsel makes an artificial and unsupported separation
22 between digital self-service and overall customer service experience. The

1 technologies that enable automation have also enabled the improvement of
2 traditional telephone interaction. Moreover, as discussed by Mr. Jacobs, Public
3 Counsel's use of the percentage of PSE customers who have actively used an
4 online account in the past as a proxy for those with digital access today is flawed.

5 **Q. Why does PSE reject Public Counsel's recommendation that PSE**
6 **demonstrate surveys submitted to the Commission and conducted by or on**
7 **behalf of PSE are based on representative samples in terms of demographics**
8 **and digital fluency?**

9 A. The survey providers used by the Company are well-regarded, nationally-
10 recognized experts in their fields, whose reputations and businesses are based on
11 their ability to provide accurate, inclusive data. They are well aware of, and
12 utilize, the best practices currently available in measuring customer satisfaction
13 and experience. To fail to do so would put their firms' credibility and future
14 viability at risk. Moreover, these surveys are only one of many vehicles used to
15 obtain PSE customer experience data and feedback, with many other tools,
16 including the existing SQI metrics, Low-Income Advisory group, Commission
17 customer complaint mechanisms and general rate case public comment hearings,
18 being among them.

19 **Q. Why does PSE reject Public Counsel's recommendation to revise SQI 10?**

20 A. The Service Appointments Kept benchmark (SQI 10) was set to 92 percent as part
21 of the Second Supplemental Stipulation in the order merging Puget Sound Power
22 & Light Company and Washington Natural Gas Company in 1997, in order to

1 prevent the degradation of customer service following the merger. PSE considers
2 the target of 92 percent to be a minimum threshold, and as shown by past
3 performance, has exceeded this threshold by achieving measurements for SQI 10
4 of 100 percent in the last five years. Therefore, PSE sees no reason to change the
5 minimum threshold at this time. Additionally, the \$50 service guarantee still
6 remains in place for any individual customers that experience missed
7 appointments.

8 **Q. Why does PSE reject Public Counsel’s recommendation that PSE provide an**
9 **annual call-reason dashboard?**

10 A. The existing customer complaint mechanism provides a means for tracking
11 whether any particular area of customer service merits increased Company or
12 Commission focus. Public Counsel has failed to provide any specific basis,
13 evidence or data supporting this recommendation, which would be burdensome to
14 the Company and would require customer-funded resources to be developed and
15 implemented.

16 **Q. Why does PSE reject Public Counsel’s recommendation that the Commission**
17 **evaluate the PSE IVR experience?**

18 A. Public Counsel offered no evidence or documentation of customer concerns with
19 the IVR, and, in fact, cited statistics highlighting the increasing customer adoption
20 of PSE’s IVR in its testimony.²¹ Any further evaluation without meaningful

²¹ *Id.* at 8:9-9:3.

1 evidence of the merits or potential benefits of such a process to the customer
2 would be purely speculative and unduly burden the Company and its customers.

3 **Q. Why does PSE reject Public Counsel’s recommendation that the Commission**
4 **monitor PSE’s implementation of GTZ?**

5 A. The existing general rate case proceedings, Service SQI metrics, and annual
6 reporting and customer complaint mechanisms, all provide adequate means of
7 oversight of the customer experience. Public Counsel has failed to support this
8 recommendation, which would also be burdensome to develop and implement.

9 **Q. Why does PSE reject Public Counsel’s recommendation that PSE be**
10 **required to educate its customer base and facilitate a transition to digital**
11 **platforms?**

12 A. Because the transition to digital platforms is already occurring. As explained by
13 Mr. Jacobs in his rebuttal testimony, most PSE customers are utilizing PSE’s
14 digital channels.²² The transition to digital platforms has been happening for years
15 and the efforts by the Company are in response to well-established, well-known
16 and widespread consumer and customer trends toward adoption of digital
17 technologies. Further, as noted previously, traditional customer service channels,
18 such as the telephone, remain in place for those who prefer and have benefitted
19 from the deployment of a more robust and modern technology platform.

²² Jacobs, Exh. JJJ-11T at 6:16-10:12.

1 **Q. Ms. Baldwin states that PSE has closed its customer service centers.²³ Why**
2 **did PSE recently close its local walk-in offices?**

3 A. The recent decision to close the seven local walk-in offices was made based on
4 the declining usage of these facilities by PSE customers. More than 100 third-
5 party walk-in payment facilities, including major grocery and retail outlets, such
6 as Walmart and Fred Meyer stores, remain available to customers across PSE's
7 service area.

8 **Q. Why does PSE reject Public Counsel's recommendation that the Commission**
9 **require a transition plan to digital platforms for agencies and institutions**
10 **that serve the less digitally fluent, economically vulnerable and those with**
11 **disabilities?**

12 A. Public Counsel's recommendation is not timely. The Company's EnergyHelp
13 digital portal was deployed in 2019 following several years of planning and
14 development in conjunction with area community action agencies and the
15 Commission. In addition, as cited previously, traditional telephone service
16 remains for those customers who prefer it or find it easier to access.

17 **Q. Why does PSE reject Public Counsel's recommendation that PSE fully**
18 **involve advisory committees to mitigate GTZ risk?**

19 A. Public Counsel's recommendation is overly broad and ignores the many existing
20 means for customer, community and Commission oversight and input. For further

²³ Baldwin, Exh. SMB-1CT at 8:5-6.

1 examination of the financial issues relevant to this recommendation, please see
2 the Mr. Jacobs' rebuttal testimony, Exh. JJJ-11T.

3 **Q. Why does PSE reject Public Counsel's recommendation that a GTZ advisory**
4 **group consider a call-abandonment rate SQI?**

5 A. Public Counsel's recommendation is not supported by data or evidence related to
6 call-abandonment rates and any correlation they may or may not have with
7 customer satisfaction. Moreover, the Company already measures the timeliness of
8 call answering in SQI 5. Beyond that, PSE has little to no control over the infinite
9 possibilities as to why a customer might choose to abandon a call, which could,
10 for example, include a customer not having their account information at hand or a
11 customer deciding to choose mobile or web self-service instead of a voice call.

12 **Q. Why does PSE reject Public Counsel's recommendation the Company be**
13 **required to report an average call answering speed?**

14 A. The proposal is redundant to the existing SQI 5 and is not supported by data or
15 evidence related to how an additional metric would increase customer
16 satisfaction. It is important to note that all metrics require time, money and
17 resources to implement.

1 **Q. Why does PSE reject Public Counsel’s recommendation that the Commission**
2 **explore whether web-based customer satisfaction surveys under-represent**
3 **customers lacking digital fluency?**

4 A. Public Counsel’s recommendation ignores the existing SQI 5 and SQI 6 metrics,
5 which provide data regarding the speed at which service is provided to customers
6 using the telephone and their satisfaction with that experience. This
7 recommendation is not supported by data or evidence and is overly burdensome to
8 our customers and the Company.

9 **Q. Why does PSE reject Public Counsel’s recommendation the Commission**
10 **expand customer service metrics related to customer bill payment**
11 **assistance?**

12 A. Public Counsel provides no evidence or data that would warrant expansion of the
13 existing SQI framework. Further, matters related to customer bill assistance,
14 payment plans and programs to aid disadvantaged customers are under the
15 purview of the Low-Income Advisory Group.

16 **Q. Why does PSE reject Public Counsel’s recommendation the Company**
17 **provide copies of all telephone scripts and training materials and to provide**
18 **annual updates if those materials are changed or updated?**

19 A. The effectiveness and helpfulness of the Company’s customer service
20 representatives is already measured by the existing SQI 6, in which it is worth
21 noting that 94 percent of PSE customers reported a satisfactory customer

1 experience, as cited by Public Counsel.²⁴ Public Counsel provided no evidence of
2 what problem this additional and overly burdensome recommendation was
3 intended to solve.

4 **IV. PSE'S RESPONSE TO RECOMMENDATIONS BY THE**
5 **ENERGY PROJECT**

6 **Q. Please summarize the recommendations from The Energy Project that you**
7 **intend to address in your testimony.**

8 Among others, The Energy Project provides the following recommendations:

- 9 • Direct PSE to develop a Disconnection Reduction Plan in consultation with its
10 Low-Income Advisory Group and file the plan with the Commission by one
11 year after the final order in this docket,²⁵
- 12 • Require PSE to file a detailed annual report largely related to service
13 disconnections,²⁶
- 14 • Increase the funding for Community Action Partnership (“CAP”)
15 organizations to administer PSE’s Home Energy Lifeline Program (“HELP”)
16 from 20 to 30 percent of program costs,²⁷ and
- 17 • Require PSE to continue the “last knock” practice of premise visits by
18 appropriate personnel, such as customer service representatives, at the time of

²⁴ Baldwin, Exh. SMB-1CT at 39, Table 10.

²⁵ Collins, Exh. SMC-1T at 23:8-11.

²⁶ *Id.* at 22:9-23:7.

²⁷ *Id.* at 9:3-10.

1 remote disconnection until the proposed Disconnection Reduction Plan is filed
2 and approved.²⁸

3 **Q. Does PSE agree with any of the recommendations provided by The Energy**
4 **Project?**

5 A. Yes. PSE supports The Energy Project's goal of reducing or eliminating
6 disconnection of service. PSE views disconnection of service as the last resort and
7 to the extent we can eliminate the need to disconnect a customer for nonpayment,
8 it is in the best interest of all parties. However, sometimes disconnections for
9 nonpayment are necessary in order to minimize the cost burden or exposure to the
10 Company and to ensure equity for all customers when PSE has been unable to
11 collect for services provided to a customer. As a result, PSE supports the first two
12 recommendations above, which include: (1) development of a Disconnection
13 Reduction Plan in consultation with its Low-Income Advisory Group and to file
14 the plan with the Commission by one year after the final order in this docket; and
15 (2) filing an annual report with the information requested by The Energy Project
16 in order to properly articulate and monitor the disconnection trends on a yearly
17 basis.

²⁸ *Id.* at 23:13-17.

1 **Q. Is The Energy Project’s desire to have 30 percent of agency administration**
2 **fees covered instead of the current value of 20 percent justified?**

3 A. No. This is a significant increase in the funding of administrative costs for the
4 agencies administering the HELP program. The request for this significant
5 increase is unjustified and arbitrary. Documentation and analysis of CAP
6 administrative costs and efficiency opportunities are needed before increasing the
7 funds that go towards administration of the low-income programs.

8 **Q. What do you propose?**

9 A. PSE’s recommends an analysis of CAP administrative costs be made outside this
10 rate case and through the contracting process.

11 **Q. Does PSE agree that it should continue “last knock” premise visits in**
12 **connection with remote disconnection until a Disconnection Reduction Plan**
13 **is filled and approved?**

14 A. No. PSE disagrees with establishing a blanket “last knock” requirement when
15 disconnecting a customer for nonpayment. PSE understands that the ongoing
16 rulemaking in Docket U-180525 will define the requirements for AMI
17 disconnect/reconnect process, a view that is also shared by Public Counsel.²⁹
18 Moreover, PSE believes that “door knocking” is not the only communication
19 method to prevent disconnections and that a variety of communication channels
20 (i.e., multiple mailed notices, outbound calling, text messaging, emails and billing

²⁹ Baldwin, Exh. SMB-1CT at 27:10-15.

1 inserts) already exist and are equally effective, safer and more convenient in
2 providing customers with opportunities to avoid disconnection.

3 **Q. What is your understanding of the current rulemaking process for remote**
4 **disconnect/reconnect?**

5 A. The AMI Rulemaking process is underway in Docket U-180525. This process
6 should be the forum for determining guidelines for remote connect/disconnect
7 procedures in Washington State. The current draft rules address timing for
8 executing remote commands, what premises are eligible for remote disconnection
9 versus those that will continue to receive a field visit and the notices required.
10 Therefore, discussions on these items should occur within the AMI Rulemaking
11 rather than this testimony.

12 **Q. Why does PSE disconnect customers for non-payment?**

13 A. PSE disconnects customers for non-payment per WAC 480-100-128. When a
14 customer is delinquent on payments for regulated service and does not meet the
15 requirements in the above referenced WAC for medical or agreed upon payment
16 arrangements, PSE will disconnect after issuing the proper notices. Disconnection
17 prevents outstanding charges from growing and utilizes any deposit being held to
18 cover as much of the balance as possible. Under the “Prior Obligation” rule PSE
19 must move this debt to a closed account, where some or all of the dollars may get
20 written off as bad debt. Increased bad debt write offs impact all customers. Absent
21 the ability to disconnect for nonpayment when customers are delinquent, PSE has

1 no recourse to prevent balances from continuing to increase. This in turn does not
2 help the customer as the ability to pay becomes more and more difficult for them.

3 **Q. How does PSE disconnect customers today?**

4 A. Because of PSE's legacy meter technology, the current process to disconnect
5 customers requires a Customer Field Representative to physically visit the
6 premise to disconnect service. While at the premise, if payment is not received the
7 CFR will disconnect the meter. The process to do this is to pull the meter from the
8 socket and install disconnect sleeves, and then return the meter to the socket.
9 While most site visits are uneventful, some have resulted in safety concerns for
10 the Customer Field Representatives, including encountering threatening
11 customers or potentially dangerous access issues such as animals. With the
12 extensive number of channels which customers can use to pay PSE today, the site
13 visits are not as useful. Customers can pay on the Web, the Mobile App, IVR,
14 with a telephone customer service representative or at more than 100 walk-in
15 locations.

16 **Q. How will the disconnect process change as a result of GTZ?**

17 A. When PSE implements remote connect/disconnect for non-payment, the process I
18 just outlined will change. Customers will continue to receive all required notices,
19 as well as some additional courtesy reminders, informing them that they have a
20 delinquent account and may be subject to disconnection. Each notice will include
21 information about the various payment channels and options for getting energy
22 bill assistance or making payment arrangements as needed. If the customer is

1 eligible for an AMI remote disconnect, they will be informed that the power will
2 be shut off without a physical visit from a Customer Field Representative. If the
3 customer is not eligible for remote per WAC 480-100-128, then PSE will send a
4 Customer Field Representative to the premise for disconnection. In the instances
5 where PSE is sending a Customer Field Representative to disconnect/reconnect,
6 the customer will be charged a fee of per the tariff. In the instances where a
7 customer is remotely disconnected/reconnected, the customer will not be charged
8 a fee given the automation under the current tariff.

9 **Q. Do you agree with The Energy Project’s assertion that PSE is reducing 50**
10 **percent of disconnects through site visits?**

11 A. No. We believe greater deployment, awareness and utilization of self-service
12 payment options, including payment arrangements and assistance via the
13 EnergyHelp portal, are a more effective strategy for reducing disconnections than
14 reliance on “last knock” field visits.

15 V. CONCLUSION

16 **Q. Does this conclude your prefiled rebuttal testimony?**

17 A. Yes, it does.