

**BEFORE THE STATE OF NEW JERSEY  
OFFICE OF ADMINISTRATIVE LAW**

**I/M/O THE PETITION OF NUI UTILITIES, INC )  
D/B/A ELIZABETHTOWN GAS COMPANY ) BPU DOCKET NO. GR02040245  
FOR APPROVAL OF INCREASED BASE ) OAL DOCKET NO. PUC 3719-02  
TARIFF RATES AND CHARGES FOR GAS )  
SERVICE AND OTHER TARIFF REVISIONS )**

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**DIRECT TESTIMONY AND EXHIBITS OF BARBARA ALEXANDER  
ON BEHALF OF THE  
NEW JERSEY DIVISION OF THE RATEPAYER ADVOCATE**

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Filed: September 6, 2002

1 Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

2 A. My name is Barbara R. Alexander. I use a business title of Consumer Affairs Consultant.  
3 My address is 83 Wedgewood Dr., Winthrop, ME 04364. I appear in this case as a  
4 witness on behalf of the New Jersey Division of the Ratepayer Advocate (Ratepayer  
5 Advocate).

6 Q. PLEASE DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS FOR YOUR  
7 TESTIMONY IN THIS PROCEEDING.

8 A. I opened my consulting practice in March 1996, after nearly ten years as the Director of  
9 the Consumer Assistance Division of the Maine Public Utilities Commission. While  
10 there, I testified as an expert witness on consumer protection, customer service and low-  
11 income issues in rate cases and other investigations before the Commission. My current  
12 consulting practice is directed to consumer protection, customer service, and low-income  
13 issues associated with the regulation of public utilities and the move to retail competition.  
14 My recent clients include the Pennsylvania Office of Consumer Advocate, New Jersey  
15 Division of the Ratepayer Advocate, Maine Office of Public Advocate, Texas Public  
16 Utility Commission, West Virginia Office of Consumer Advocate, AARP, and the  
17 National Center for Appropriate Technology. Among my publications are: Retail  
18 Electric Competition: A Blueprint for Consumer Protection, (U.S. Department of Energy,  
19 Office of Energy Efficiency and Renewable Energy, October 1998)<sup>1</sup>, “How to Construct  
20 a Service Quality Index in Performance Based Ratemaking,” The Electricity Journal,  
21 April 1996, and “The Transition to Local Telecommunications Competition: A New

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<sup>1</sup> Available on the Internet: [http://www.eren.doe.gov/electricity\\_restructuring](http://www.eren.doe.gov/electricity_restructuring).

1 Challenge for Consumer Protection” (Public Counsel Section, Washington Attorney  
2 General, October 1997). My most recent publication, “Default Service for Retail Electric  
3 Competition: Can Residential and Low-Income Customers be Protected When the  
4 Experiment Goes Awry?” (April 2002), explores how states have implemented default  
5 service policies to accompany the move to retail electric competition.

6 I have assisted the Ratepayer Advocate in its participation in restructuring  
7 activities concerning both electricity and natural gas since 1997. I submitted testimony  
8 on behalf of the Ratepayer Advocate in all the electric utility restructuring proceedings  
9 on consumer education, customer protection, and Code of Conduct issues. I submitted  
10 testimony on behalf of the Ratepayer Advocate on all the natural gas restructuring  
11 proceedings on these same issues. Most recently, I filed testimony on behalf of the  
12 Division of Ratepayer Advocate on the merger of FirstEnergy and GPU Energy (Jersey  
13 Central Power & Light), the merger of Conectiv (Atlantic City Electric) with Potomac  
14 Electric Power Co., and the acquisition of New Jersey American Water Co. and Thames  
15 Water Aqua Holdings GmbH (Thames) by RWE AG (RWE), a multinational corporation  
16 based in Essen, Germany.

17 I am also an attorney and a graduate of the University of Michigan (1968) and the  
18 University of Maine School of Law (1976).

19 My resume is attached as Exhibit BA-1.

20 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

21 A. The purpose of my testimony is to respond to the petition by Elizabethtown Gas Co. (“E-  
22 town” or “the Company”) for a base rate increase and other tariff changes with respect to

1 the following issues: (1) the proposed installation of Automated Meter Reading (AMR)  
2 technology; (2) customer service performance of E-town; and (3) the Company's  
3 uncollectible expenses. I evaluated the Company's filing and data responses submitted  
4 with respect to these issues and propose specific actions that the Board should take with  
5 respect to these matters in its consideration of E-town's proposal to raise rates or charge  
6 additional fees in this case.

7 Q. PLEASE SUMMARIZE YOUR OVERALL CONCLUSIONS AND  
8 RECOMMENDATIONS.

9 A. A summary of my key conclusions and recommendations are as follows:

- 10 • I do not oppose the installation of AMR technology. This type of technology is not  
11 unusual and many large gas utilities have installed or are installing AMR devices on  
12 customer meters for reasons similar to those outlined by Ms. Bergen in her testimony.  
13 However, I do oppose the use of the Customer Technology Clause (CTC) cost recovery  
14 methodology as proposed by the Company. The Company's approach would impose  
15 costs on current customers without taking into consideration cash-flow benefits and  
16 reduced expenses that are likely to accompany the installation of these devices.
- 17 • I reviewed the Company's billing and collection system, call center performance, the  
18 incidence of customer complaints, and customer satisfaction survey data. I have  
19 concluded that the following specific improvements should be made:

20 < The Company's residential customer bill format needs significant  
21 improvement;

22  
23 < The customer call center performance has been below average, and while  
24 performance has recently improved, the Company should be required to  
25 continue its current level of performance (or better) or forfeit funds to

1 customers up to a total of \$360,000 based on two specific performance  
2 measurements;

3  
4 < E-town's customer complaint ratio is higher than most other New Jersey  
5 utilities and the Company should be required to conduct a root cause  
6 analysis and adopt programs to reduce this high level;

7  
8 < The recent performance of field service operations (appointments and  
9 timely premise visits) has deteriorated in 2002. The BPU should require  
10 E-town to provide quarterly performance reports on key performance  
11 metrics in this area and open a formal investigation if deterioration in this  
12 area continues; and

13  
14 < E-town's uncollectible expense has significantly increased since 1999, due  
15 in part to the Company's deficient collection procedures. The BPU should  
16 require a management audit to review the Company's collection protocols  
17 and identify remedial actions.  
18

19 AUTOMATED METER READING PROGRAM

20 Q. DESCRIBE THE COMPANY'S PROPOSAL FOR THE INSTALLATION OF AMR  
21 AND RATE RECOVERY OF ITS AMR PROGRAM EXPENSES.

22 A. E-town submitted the testimony of Jane Bergen, Director of Billing Services, in support  
23 of its proposed AMR program, including its method of cost recovery. E-town decided to  
24 install AMR devices in 2000 and initiated installation on customer gas meters in 2001;  
25 however, it is doing so on a very slow time frame. Under the current schedule, it will  
26 take 13 years to install AMR devices on all meters. As of May 2002, the Company has  
27 installed 19,000 devices, leaving 241,000 to be installed. [S-EP-23] These devices are  
28 an "add on" to current E-town meters. The purpose of the device is to allow the  
29 Company to read the customer's meter without accessing the meter itself, most of which  
30 are installed inside the customer's dwelling or place of business. By relying on the AMR  
31 device, E-town can electronically capture the meter reading from outside the dwelling,

1 either by a meter reader with a hand held device or in a vehicle that cruises the  
2 neighborhood. In this case, E-town is proposing to accelerate the deployment of 30,000  
3 AMR devices in certain geographic areas (Perth Amboy and Elizabeth) and recoup the  
4 costs of this accelerated installation in the CTC tariff rider that would charge all  
5 customers an additional charge to recoup \$4 million in estimated costs:

- 6 • \$559,000 for incremental meter replacement;
- 7 • \$1.63 million for the AMR devices themselves;
- 8 • \$100,000 for a mobile data command unit to obtain meter  
9 readings;
- 10 • \$1.26 million to install the devices; and
- 11 • \$405,000 to test and refurbish meters removed from customer  
12 premises.

13 The Company does not acknowledge any cost savings that will reduce the CTC  
14 charges, although Ms. Bergen describes several long term positive benefits, including  
15 reduced complaints associated with the current practice of issuing estimated bills, a more  
16 efficient meter reading work force, an increased percentage of actual meter reads  
17 (particularly if monthly meter reads are done in some areas), improved cash flow due to  
18 fewer disputed bills, and better information to detect theft of service. [Bergen at 9-11] E-  
19 town proposes to recover the costs of the accelerated program (*i.e.*, the \$4 million) in the  
20 CTC over five years and alleges that this approach would be cheaper for ratepayers than  
21 traditional rate recovery because there is no allowance for an equity return in the CTC  
22 and the installation costs would be recovered at the same interest rate used in the Social

1 Benefits Charge. The Company also suggests public policy benefits for this type of rate  
2 recovery, such as positive impacts on conservation and competitive programs due to the  
3 installation of AMR. [Bergen at 12]

4 Q. PLEASE DESCRIBE YOUR OVERALL OPINION REGARDING THE  
5 INSTALLATION OF AMR.

6 A. I do not oppose the installation of AMR technology. This type of technology is not  
7 unusual and many large gas utilities have installed or are installing AMR devices on  
8 customer meters for reasons similar to those outlined by Ms. Bergen in her testimony.  
9 For example, the following utilities in the New England and mid-Atlantic region have  
10 installed such devices on a large scale: PECO Energy; Philadelphia Gas Works;  
11 Baltimore Gas and Electric, PPL Electric Utilities in Pennsylvania, Keyspan Energy in  
12 New York, Public Service Electric & Gas in New Jersey, Duquesne Light Company,  
13 Southern Connecticut Gas, Northeast Utilities, Philadelphia Water Dept., Bay State Gas,  
14 Boston Gas Company, Commonwealth Gas (Massachusetts), and Providence Gas Co. [S-  
15 EP-21]. However, I do oppose the use of the CTC cost recovery methodology as  
16 proposed by the Company. The Company's approach would impose costs on current  
17 customers without taking into consideration cash-flow benefits and reduced expenses that  
18 are likely to accompany the installation of these devices. Mr. David Peterson on behalf  
19 of the Ratepayer Advocate will propose the proper ratemaking treatment for costs  
20 associated with the AMR program.

21 Q. PLEASE EXPLAIN IN MORE DETAIL YOUR OPPOSITION TO THE COMPANY'S  
22 PROPOSED CTC.

1       A.     I have three reasons for opposing E-town's CTC proposal. First, the Company's  
2             proposed cost recovery approach method would include not only the cost of the AMR  
3             devices themselves—estimated at approximately \$53 per device [RAR-CS-31]—but the  
4             costs of removing, testing and refurbishing the meter. These costs are part of the  
5             Company's normal meter inspection and maintenance program and should not be  
6             allocated to separate cost recovery under the AMR program. In addition, E-town is  
7             proposing to include the labor costs to conduct the meter inspection, maintenance, and  
8             meter removal and replacement in the CTC. However, these expenses are not associated  
9             with the labor cost to install the AMR device itself, but again relate to the regular meter  
10            inspection and maintenance program. The actual labor cost to install an AMR device is  
11            only \$1.00 for devices installed at the meter manufacturer and \$1.50 per meter for  
12            devices installed at the location where the current meters are being refurbished. [RAR-  
13            CS-31 and 32]. Finally, E-town is proposing to include the costs of replacing certain  
14            meters, an expense that is not related to the installation of the AMR device itself, but  
15            again is part of the Company's normal meter maintenance and replacement program.  
16            According to RAR-CS-28, the Company has spent over over \$1 million annually in 2000  
17            and 2001 to replace meters without any relationship to the AMR program. The attempt  
18            to add meter inspection, maintenance, replacement costs (meters and labor) to the CTC  
19            for AMR installation is not proper.

20               Second, the Company fails to acknowledge the probable cost savings associated with  
21               a widespread installation of AMR technology. PECO Energy has installed AMR throughout  
22               its service territory without separate cost recovery and under the constraint of price caps



1 applicable for a lengthy time period. The same is true for PPL in Pennsylvania. I conclude  
2 that those utilities have found that long term benefits exceed the short term costs incurred for  
3 installing AMR devices. By delaying recovery of the incidental costs associated with AMR,  
4 a utility will reap benefits in improved customer service, reduced complaints, faster  
5 resolution of disputed bills and improved cash flow. Such installation also provides the  
6 utility the potential for future revenue enhancement in the form of services that can be  
7 marketed to gas marketers (in the form of real time meter information) should gas  
8 competition take off. I do not have any means of estimating the value of these benefits, but  
9 the Company's method of cost recovery leaves no possibility of ever linking these benefits or  
10 any potential benefits to the costs imposed on customers for the rapid installation program.  
11 The Company has not evaluated these benefits or attempted to quantify them in a rigorous  
12 manner.<sup>2</sup>

13 Third, the Company has every incentive to install AMR technology and reap the  
14 benefits even without relying on the CTC cost recovery method. The Company has a high  
15 incidence of interior meters and it is a costly process to obtain actual meter reads, requiring  
16 numerous attempts to reach the customer and obtain entry to read the interior meter. E-town  
17 routinely issues 30% or more estimated bills each month due to the lack of a meter reading.  
18 The Company's high volume of calls relating to meter reads, meter work, and high volume  
19 of estimated bills issued every month is a source of expense and customer dissatisfaction that  
20 will be reduced or eliminated with an AMR system. [RAR-CS-1, RAR-CS-10, RAR-CS-12]

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<sup>2</sup> A study was conducted in 2000 that estimates future savings of \$2.5 million once all the AMR devices are installed, but the Company now states that this analysis does not reflect current information. See RAR-CS-36.

1 Furthermore, the Company has already documented a reduction in unsuccessful meter reads  
2 and reduction in the issuance of estimated bills due to the relatively small number of AMR  
3 installations to date. [RAR-CS-19] The Company has acknowledged the benefits of  
4 installing AMR [as described in the testimony of Jane Bergen], but has not calculated those  
5 benefits. In any event, the use of the CTC cost recovery methodology would not allocate any  
6 of the benefits to customers, only the costs. For example, the use of AMR devices would  
7 allow the Company to bill monthly based on actual meter reads, thereby increasing its cash  
8 flow. Furthermore, a higher incidence of actual meter reads will reduce customer calls and  
9 disputes about estimated bills. Finally, there should be some labor savings associated with  
10 the use of AMR devices because such devices require fewer field visits and meter readers  
11 can operate at a higher level of efficiency. Also, the need for overtime, evening and  
12 Saturday hours will be eliminated. See RAR-CS-43.

13  
14 CUSTOMER SERVICE PERFORMANCE AND UNCOLLECTIBLE EXPENSE

15 Q. PLEASE DESCRIBE THE PURPOSE OF THIS PORTION OF YOUR TESTIMONY.

16 A. I have reviewed the customer service performance of E-town to determine whether the  
17 underlying expenses and programs reflected in the Company's test year performance are  
18 efficient and proper for inclusion in its proposed revenue requirement. If a Company fails to  
19 perform at a reasonable level of customer service, the expenses incurred to achieve  
20 inefficient or below average results should be removed from rates or, as has occurred in  
21 some jurisdictions, a reduction in the utility's rate of return is imposed.

1 Q. WHAT PROGRAMS AND POLICIES DID YOU REVIEW AND WHAT IS YOUR  
2 CONCLUSION?

3 A. I reviewed the Company's billing and collection system, call center performance, the  
4 incidence of customer complaints, and customer satisfaction survey data. I have concluded  
5 that specific improvements should be made as follows:

- 6 • the Company's residential customer bill format needs significant  
7 improvement;
- 8 • the customer call center performance has been below average, but has recently  
9 improved;
- 10 • E-town's customer complaint ratio is higher than most other New Jersey  
11 utilities;
- 12 • the recent performance of field service operations (appointments and timely  
13 premise visits) has deteriorated in 2002; and
- 14 • E-town's uncollectible expense has significantly increased in the last two  
15 years.

16 I will describe my findings and recommendations in more detail for each issue.

17 Q. PLEASE DESCRIBE YOUR CONCERNS ABOUT THE COMPANY'S RESIDENTIAL  
18 CUSTOMER BILL FORMAT.

19 A. E-town's residential customer bill does not clearly present unbundled natural gas charges.  
20 [RAR-CS-16] The Company's bill states the total amount due for "current gas charges". In a  
21 separate location and in small print, the bill does state that the "price to compare" is \$\_\_\_ per  
22 therm. Another section of the bill is entitled "How we Calculate Your Current Gas Charges,"

1 and it contains a series of boxes that show that the customer's monthly usage, converted to  
2 terms, is multiplied by three different rates (one of which is unlabeled, one of which is  
3 labeled "Basic Gas," and once of which is labeled "SBC/WNC"). None of these three rates  
4 in the three boxes correspond to the "price to compare." They are defined on the back of the  
5 bill. "Basic gas" is probably "Basic Gas Supply Service," which is the cost of gas purchased  
6 by E-town under the purchase gas adjustment feature. The undefined box is probably  
7 regulated distribution/delivery charges, but that is not explained. Why the "Basic Gas"  
8 charge does not equate to the "price to compare" is not clear either to me or to the customer.  
9 These disclosures are insufficient to allow customers to understand how the unbundled bill is  
10 calculated, what the term "price to compare" means and how to compare their current  
11 charges from E-town with the competitive natural gas supply service that might be offered  
12 by a competitive provider. I am well aware that there is little or no natural gas competition  
13 for residential customers, but this situation is likely to change in the future and the E-town  
14 bill does not properly accommodate the requirements of the Electric Discount and Energy  
15 Competition Act (EDECA). I recommend that this bill format be improved by a clear  
16 presentation of the unbundled charges in plain language on the front of the bill. I attach an  
17 unbundled bill from South Jersey Gas that properly presents a customer's unbundled charges  
18 and that could provide a model for E-town as Exhibit BA-2.

19 Q. PLEASE DESCRIBE YOUR REVIEW OF E-TOWN CUSTOMER CALL CENTER  
20 PERFORMANCE.

21 A. E-town's customer calls were routed to a call center in Florida beginning in 1999. Since that  
22 time, the quality of the customer service provided by this call center has been below average.

1 The percentage of calls answered within 30 seconds was below 55% in 2000 and below 65%  
2 for most of 2001. The call center has, however, consistently operated above 80% in 2002.  
3 The same sort of performance (poor in 2000 and 2001) and improvement in 2002 is evident  
4 in other call center performance statistics monitored by the Company. [RAR-CS-1 and RAR-  
5 CS-13]

6 The issue here is how to ensure that the Company is incented to maintain its 2002  
7 performance into the future. I recommend that the BPU assess a specific amount of customer  
8 compensation dollars for the failure to maintain performance levels in the future:  
9 specifically, 80% of calls answered within 30 seconds, and a busy rate of 2% or less. The  
10 Company tracks these performance metrics and has internal goals that match my  
11 recommended performance levels. I recommend an amount of \$180,000 be placed at risk for  
12 the failure to achieve either performance metric in any calendar year. If triggered, the  
13 penalty amount should be returned to all customers in the form of a one-time bill credit. I  
14 base this amount (a total of \$360,000) as equal to 10% of the costs of this call center  
15 allocated to E-town and proposed to be recovered from E-town's ratepayers in this case. [S-  
16 ERD-75]

17 Q. PLEASE DESCRIBE YOUR REVIEW OF E-TOWN'S CUSTOMER COMPLAINT  
18 RATIO.

19 A. E-town has a high ratio of customer complaints filed with the BPU compared to other New  
20 Jersey utilities. The following chart reflects the BPU figures as provided in RAR-CS-1,  
21 attachment E:  
22

Year	BPU Complaint Ratio per 1,000 customers (written and verbal)	Rank (compared to other NJ utilities, where "1" is the highest complaint ratio)
1998	1.3740	4 out of 6
1999 (Through Third Q—data missing for 4 <sup>th</sup> Q	1.0432	2 out of 5
2000	2.2324	2 out of 6
2001	3.4945	2 out of 6

I cannot at this time determine the reason for this higher than average complaint ratio, but I recommend that E-town analyze the root cause(s) of these customer contacts with the BPU to determine why these customers were not provided a satisfactory response to their concern at the time they contacted the Company, as well as what practices or policies should be adopted to reduce this high rate of customer complaint. In addition, this trend relates in part to my concerns about the Company's uncollectible expense, which I describe next.

Q. PLEASE DESCRIBE YOUR CONCERNS WITH THE COMPANY'S UNCOLLECTIBLE EXPENSE.

A. E-town's net write-off expense has steadily increased in the last five years, from \$1.5 million in fiscal year 1997 to \$3.9 million in 2001, a 160% increase. As a percent of revenue, uncollectible expense has increased from .82% to 1.22% [S-EREV-84 and S-EREV-33] This increase suggests that the Company has not been efficiently collecting its bills. In fact, E-town has described a lower than appropriate level of collection activity in 1999 [RAR-CS-5], but claims that its collection efforts since that time have been "steady." Unfortunately, the higher winter bills of 2000-2001 no doubt contributed to higher losses, but the lack of proper collection in 1999 only exacerbated the problem of collecting overdue bills starting the

1 following year. Other practices that may explain this indicator include the fact that E-town  
2 cannot issue a disconnection notice for an estimated bill and a large portion of the  
3 Company's bills are estimated, thus delaying routine collection activities. I also note that E-  
4 town's disconnection ratio (the percent of residential customers disconnected) also dropped  
5 in 1999 (reflecting the Company's statements about its lack of proper collection in 1999),  
6 and then rose to 1.1% in 2000, and 1.9% in 2001. [RAR-CS-1(h)] I do not suggest that the  
7 Company should necessarily increase the volume of disconnections (although that approach  
8 might be appropriate in situations in which the customer has the ability to pay and has  
9 demonstrated a refusal to do so), but the erratic volume of disconnections typically translates  
10 into customer confusion as to what to expect when the bill is not paid on time and a delay in  
11 collection until the bill is too high for the customer to handle. Furthermore, the use of a  
12 consolidated call center and the increase in customer contacts to the BPU suggests that the  
13 Company may not be properly offering and negotiating deferred payment plans and  
14 following up on those plans to obtain payment. Finally, there is an element of inability to  
15 pay reflected in this indicator, and E-town has not implemented any targeted bill payment  
16 assistance programs. The Company should be required to conduct an analysis of its  
17 collection efficiency and the increase in uncollectible expense.

18 Based on the above, it appears that the Company has inefficient collection practices  
19 which may be negatively affecting the level of uncollectibles. Therefore, I recommend that  
20 the Board require a management audit to review Company protocol and practical application  
21 of protocol in order to determine any remedial action that should be taken to improve the  
22 cash flow regarding uncollectible expenses.

1 Q. WHAT WAS YOUR CONCLUSION AFTER REVIEWING THE COMPANY'S  
2 CUSTOMER SATISFACTION SURVEY RESULTS?

3 A. I reviewed E-town's most recent customer satisfaction survey results [RAR-CS-2] to  
4 determine if there were any trends that indicated performance problems, particularly in areas  
5 in which the Company does not regularly track objective measures of performance.  
6 Customer satisfaction surveys are subjective measurement of customer service performance,  
7 but they may indicate areas in which further research and monitoring should take place.  
8 With respect to E-town's customer satisfaction surveys, the most recent quarter in 2002  
9 indicates a significant deterioration in the performance of field service operations,  
10 particularly with respect to the Company's response to the need for field visits and premise  
11 visit appointments. Twenty percent disagreed with the statement that the Company  
12 "responds quickly" to the need for service visits; 22% disagreed to the statement that E-town  
13 offers "convenient appointments;" and 9% disagreed that the Company "provides quality  
14 service visits." These results are significantly worse than other survey results in the past year,  
15 indicating some sort of recent development in field operations performance. I recommend  
16 that the BPU require E-town to gather and report objective performance data as follows:

- 17 • Average time/days to respond to request for field visit;
- 18 • Percent of on-time appointments met by the Company (excluding those  
19 failures due to the fault of the customer).

20 This performance data should be reported quarterly to the BPU and the Division of  
21 Ratepayer Advocate. If performance in this area continues to deteriorate or fails to improve,  
22 the BPU should initiate a formal investigation.



1       Q.       DOES THIS COMPLETE YOUR TESTIMONY AT THIS TIME?

2       A.       Yes, it does.

3