

BEFORE THE
ILLINOIS COMMERCE COMMISSION
PUBLIC UTILITIES OPEN MEETING
Thursday, August 3, 2023
Chicago, Illinois

Met pursuant to notice at 11:30 AM at
160 North LaSalle Street, Chicago, Illinois.

PRESENT:

MR. DOUGLAS P. SCOTT, Chairman
MICHAEL T. CARRIGAN, Commissioner
CONRAD REDDICK, Commissioner
STACEY PARADIS, Commissioner
ANN McCABE, Commissioner

MAGNA LEGAL SERVICES

BY: Michael Marciniak, CER

Notary Public

1

2 CHAIR SCOTT: Moving onto our Public utilities
3 agenda.

4 We will hear from Mr. Steinsultz. Mr.
5 Steinsultz if you're here you have three minutes. Oh.
6 You're virtual, very good. Please spell your name for
7 the court reporter; and we are keeping track of your
8 time and we will let you know when your time has
9 expired. So, go ahead.

10 MR. STEINSULTZ: Okay. Thank you. My name is
11 Matt Steinholtz, M-A-T-T, last name,
12 S-T-E-I-N-S-U-L-T-Z. Thank you. My name is Matt
13 Steinsultz and I'm a resident of Chicago and customer of
14 Com Ed. And I'm here today to ask the Commission to
15 reject the proposed rate increases for natural gas
16 service. The climate crisis is an emergency and we have
17 to be taking every action possible to end all fossil.

18 Fuel usage. Global temperatures are currently
19 the highest values reported in past 100,000 years.
20 Science has been very clear. If we have any hope of
21 avoiding the worst impacts of climate change, we have to
22 end all fossil fuels by 2050.

1 The state of Illinois has committed to
2 achieving this goal of zero carbon emissions by 2050.
3 If this Commission wants to support the state in
4 achieving such a massive change, we need to start taking
5 action now. This is why it does not make sense for
6 utilities to spend hundreds of millions of dollars
7 investing in infrastructure that when it will be
8 obsolete in less than 30 years.

9 Not only do these systems continue to prop of
10 fossil fuel usage; they put the burden of cost on rate
11 payers who are already struggling to pay their bills.
12 Furthermore, as more buildings and transportation are
13 electrified, those who can afford their gas will switch
14 to lower cost and lower emission electric devices
15 leaving a shrinking number of households to stop paying
16 the bill for these poor investments made by utility
17 companies. Fossil fuels like natural gas have no future
18 on a renewable climate. We need a comprehensive plan
19 for all of our energy utilities to provide clean and
20 affordable energy for all.

21 Continuing to build new gas infrastructure is
22 bad for the people of Illinois and bad for the planet.

1 I am asking the Commission to reject these monumental
2 gas rate hikes and instead develop a plan for investing
3 in electrification and a zero carbon energy system.

4 Thank you.

5 CHAIR SCOTT: Thank you Mr. Steinsultz.

6 For the sake of the time and convenience, we
7 will begin today's Public Utilities Agenda with item
8 O-4, which entails a presentation from Liberty
9 Consulting Group regarding its management audit of Com
10 Ed pursuant to sections 8-102 and 4-604(g) of the Public
11 Utilities Act.

12 For the presentation, Liberty will present its
13 findings to the Commission followed by questions from
14 the Commissioners.

15 Please note, Mr. Glenn Rippie and Mr. David
16 Glockner from Com Ed and Exelon will provide a brief
17 response after the presentation. And will be available
18 to answer any questions from the Commission.

19 Okay. I invite Mr. John Antonuk, I apologize
20 if I mispronounced your name, President from Liberty
21 Consulting Group, to the podium to present Liberty's
22 findings and recommendations. Sir, go ahead.

1 MR. ANTONUK: Thank you. That was
2 refreshingly accurate.

3 CHAIR SCOTT: I got one right today.

4 MR. ANTONUK: Our nearly 35 years of work with
5 more than 40 U.S. regulatory commissions include service
6 to the ICC that stretches back now more than 20 years.
7 And it's always a pleasure to meet with a client with
8 whom we've have had such a long a productive
9 relationship in our visits. Provisions of the Climate
10 and Equitable Jobs Act address utility ethical conduct
11 and transparency. Section 4604G, requires a management
12 audit following a conviction plea agreement or Defer
13 Prosecution Agreement; DPA by public utility. The US
14 attorney's office for the Northern District of Illinois
15 announced that it had reached a DPA addressing an
16 investigation involving Com Ed. The Illinois Commerce
17 Commission engaged the Liberty Consulting Group to
18 perform the audit called for upon court approval of the
19 DPA.

20 Our audit addressed all six of the elements
21 that section 4604 says need to be included in such an
22 audit group. Some what for convenience and efficiency

1 in the conduct of the audit.

2 First, financial and accounting procedures,
3 internal controls, and practices. Second, assessment of
4 ethics and compliance risks. Third, ensuring effective
5 communication of controls, codes, practices, and
6 procedures. Fourth, enforcing those controls, codes,
7 practices, and procedures. Fifth, providing support for
8 and commitment to compliance and ethics. And sixth,
9 effectiveness of actions following allegations and
10 ultimately when it occurs, confirmation of misconduct.

11 We conducted our field work over a period of
12 about five months, and we asked for and received in all
13 cases, responses to about 300 data requests. We also
14 conducted 30 interviews and participated in a number of
15 work Sessions, at which we rang through how a variety of
16 tools and systems related to compliance and ethics
17 operate on a real-time basis.

18 Company personnel at both Com Ed and Exelon
19 were fully cooperative, and provided us with complete
20 responses to our data requests and interviews; and
21 engage productively in assessing areas where possible
22 improvement opportunities arose as our field work

1 continued.

2 Turning first to the area of financial and
3 accounting procedures, controls, and practices: We
4 found them sufficient overall; we did make two
5 recommendations that we think would enhance finance and
6 accounting measures in the internal controls department.

7 The first was intended to ensure conformity
8 with the requirements of section 604D2D. At the time of
9 the audit, the then Chief Compliance and Ethics Officer,
10 since retired, had relied on work under the direction of
11 the head of Internal Audit in reviewing internal
12 controls. We found it sound to have placed substantial
13 weight on internal audits work, given the primacy of
14 that organization's role with respect to controls.
15 Nevertheless, we viewed the act as requiring a distinct
16 review of internal controls by the Chief Compliance and
17 Ethics Officer. We did find reliance in ethics
18 activities so it was not a matter of a gap, it was
19 really a matter of the issue of the separate review that
20 we believe is required by the Chief Compliance Officer.

21 The second improvement opportunity arose from
22 what we observed as a lag in ensuring the policy

1 procedure document reviews and revisions to them
2 occurred within the time limits provided for doing so.
3 Eliminating that lag will reduce marginal improvement in
4 the clarity of required and expected actions and
5 processes. More significantly, it will reinforce the
6 commitment to and the importance of ethics and
7 compliance in the demonstration of that by showing
8 diligence in conducting required reviews on the
9 schedules that are set forth.

10 Turning to the second area of ethics and
11 compliance risk assessments. We found the sound
12 organization, resources, methods, and activities for
13 conducting compliance and ethics risk assessments; that
14 area was a particular strength in our opinion. The risk
15 assessment process which has recently been enhanced
16 produces descriptions of gaps and improvement -- and
17 improvement opportunities identified and means and
18 methods for addressing them.

19 We also found broad participation in risk
20 assessment activities, engaging subject matter experts
21 from across Exelon; including substantial representation
22 from Commonwealth Edison. We also found strong and

1 regular sharing of information about risks, and their
2 mitigation with executive leadership and with the boards
3 of directors of both Com Ed and Exelon. We did find one
4 area where we believe moderate improvement is possible,
5 and that is in enhancing the tracking of status and
6 implementing recommendations that resulted from risk
7 assessment and other compliance and ethics processes.
8 That improvement will enhance accountability for taking
9 improvement actions and improve Board director
10 visibility into implementation status and barriers, and
11 duration of the completion of those activities.

12 Turning now to the third and fourth areas, our
13 audit addressed communication of an enforcement of
14 controls, codes, practices, and procedures together;
15 because there's substantial overlap between them.
16 Again, we found guidance documents, internal controls,
17 codes of conduct, and practices and procedures supported
18 by effective enforcement mechanisms.

19 Specific compliance and ethics components
20 factor into individual employee performance evaluations,
21 and negative ratings can affect compensation decisions.
22 Effective methods communicate and secure widespread

1 understanding of controls of the codes of conduct,
2 practices and procedures. While finding the
3 establishment communication of effective controls
4 generally sufficient and applicable to all required
5 groups, we did observe four sources of what we construe
6 as well marginal improvement.

7 Communications about compliance in ethics,
8 expressing requirements, expectations, and values are
9 sound, and they are extensive. But the compliance and
10 ethics group should develop an overall and structured
11 annual plan to guide those compliance in ethics
12 communications to ensure that they're reaching targeted
13 issues, developments, and trends. And also to
14 provide -- and offer more insight to the Board of
15 Directors about what specific initiatives in training
16 and development our plan for the year.

17 Second, following compliance and ethics
18 training which is substantial and appropriate, the
19 compliance group should follow up through participant
20 surveys or focus groups. To measure how effective
21 training has been in communicating values and
22 expectations, and in making desired behaviors and

1 expectations clear.

2 We've found in the past that even what we as
3 people who look at training and development methods
4 regularly find clear and compelling almost. Sometimes
5 that's just not the reaction to particular elements or
6 segments of the employee population, so doing a post
7 training survey and pulsing of the employees undergoing
8 them is certainly helpful in making sure that the
9 message is getting through.

10 Third, examining the sources and frequency of
11 employee contacts with the various electronically
12 reachable information sources can provide important
13 insights about compliance in ethics, interests,
14 concerns, and importance to employees. It's one way of
15 seeing what employees are regularly looking at, what
16 they may not be looking at, despite a belief that there
17 are important documents.

18 It's not so much a matter of finding out what
19 individual employees are doing and looking at, you know
20 from a privacy protection point, but it's really more an
21 issue of looking at the hits that you get to those
22 sources to see what it is employees are or accessing.

1 Fourth and finally, progress has been made in
2 using regular employee engagement surveys to solicit
3 compliance and ethics feedback. And we think that's a
4 strong development at Com Ed; it's not something we see
5 everywhere, but it's something we think is becoming
6 increasingly important.

7 What we have recommended, however, is that
8 unlike what's typically done in employment engagement
9 surveys, which is this sort of see how employees respond
10 to the same questions and the same issues over time.

11 Compliance and ethics because of developments
12 and to some extent because of the experience that Com Ed
13 had recently, we think a benefit from a more nuanced
14 look at how questions are designed and how they may
15 change. In other words, while it's important to get a
16 consistent view over time about responses to similar
17 questions in this area, we think some tweaking is in
18 order. To make sure that the survey is engaging in
19 current issues and being responsive to things that
20 management needs to track to make sure that the program
21 is doing everything that it can.

22 We did find two other areas where we were not

1 clear on when they would be executed; we expected that
2 they would be. We basically cited them in the report
3 just as a way of putting an explanation point behind the
4 importance of getting them done. And the first of those
5 was to follow through on a series of outstanding
6 training recommendations. And the second was to
7 continue on plans to use exit interviews with departing
8 employees to address with them compliance and ethics
9 program procedures and effectiveness.

10 Turning now to the fifth area, we addressed
11 the support for and commitment to compliance and ethics.
12 Again, finding the documentation and the program
13 comprehensive, clear, appropriately scoped, and
14 supported by adequate procedures. The organization
15 primarily responsible for the program, Exelon compliance
16 and ethics, is lead by a committed senior executive
17 whose organization is sufficiently empowered; and
18 empowered is important.

19 Organizations exist just about everywhere the
20 degree to which they can -- they have the clout to get
21 done what they're there for. Is sometimes in question,
22 I don't think that's the case here; it's also well

1 experienced and well structured.

2 ECE, which is the Ethics and compliance
3 organization. Has access to and regularly makes use of
4 a broadly based group of subject matter experts from
5 across Exelon to assess risks; to be messengers for
6 ethics and compliance and to work at identifying areas
7 where changes may be appropriate that also includes
8 substantial representation from Com Ed.

9 Policies adopted since the DPA comprehensively
10 address lobbying and political consulting agreements and
11 services in interactions with public officials. We
12 found that the regular reporting required under those
13 policies was sound and has been diligently executed.
14 Controls require senior and ethics and compliance
15 approval of lock-ins retention, written contracts and
16 invoices detailing services provided, due diligence or
17 disclosure forms from lobbyists. Twice yearly
18 documented lobbyist activity and performance reviews
19 that have to be signed off by senior personnel not just
20 the person doing the review. And detailed reporting
21 requests from public officials.

22 A broadly scoped and well defined set of

1 limits on provisions and gifts and other items of value
2 by employees also exist. We look specifically also at
3 how the Exelon Com Ed Boards act to set a defective tone
4 at the top. To support and foster commitment to
5 compliance and ethics and to set appropriately high
6 expectations for compliance.

7 We found these aspects of providing support
8 for a commitment to compliance and ethics sufficient;
9 but offer one recommendation. We found the governing
10 documents give only generally defined and I'll use air
11 quotes; I hate to do it.

12 But executive management and equally generally
13 defined ethics and compliance oversight. I'm omitting
14 the air quotes there. That role requires more
15 definition and specifically delimitation; particularly
16 relevant should the company face future incidents that
17 involve high level obligations of misconduct.

18 It should be made clear that executives do not
19 have the ability to self define what oversight means and
20 allows. But instead, should be made to understand that
21 their contribution focuses on promoting and acting to
22 secure compliant ethical performance not just in their

1 organization, but by themselves.

2 I believe that this is in fact the intent of
3 understanding of leadership. So, it's not a question of
4 thinking that there is any deliberate omission here; our
5 principle concern about this issue lay elsewhere.

6 Consider, for example the perspective an employee who's
7 concerned but wary about reporting circumstances or
8 incidents.

9 Fuzziness and documentation available to that
10 employee on websites and otherwise, about how executive
11 management might occur. Particularly in sensitive
12 matters involving senior managers or executives can dim
13 prospects for reporting and for continuing to provide
14 information needed for and useful in investigations.

15 The two generally described executive
16 oversight role however, I -- I want to point out stands
17 in contrast. To what we generally found otherwise and
18 we saw which is clear and confidence building statements
19 in governing documents, procedures, and other guidance
20 in communications about compliance and evidence.

21 Turning now to the sixth and last area our
22 audit addressed we found with respect to actions

1 following discovery of potential misconduct or
2 validation that it has occurred after investigation. We
3 found that the investigating processes that apply well
4 designed and timely completed.

5 And on review of specific documentation and
6 discussion of a number of actual investigations, gave no
7 indication that they lacked either objectivity or
8 diligence in their execution.

9 Participation in and actions to identify
10 remedies once misconduct was found, appeared sound in
11 deciding how to assign personal consequences for
12 misconduct. And in identifying where individual cases
13 where misconduct or other concerns that been validated
14 may warrant a review of compliance program or other
15 governing document contact or content for potential
16 improvement.

17 So, it was clear that both in responding to
18 specific incidents and in determining what implications
19 those incidents had for the program, we found a strong
20 intention and appropriate attention. We did make one
21 recommendation of moderate significance and it also
22 relates to an issue I got into a little bit earlier.

1 Which is kind of the tone or the message or
2 the perception of message by a person who is thinking
3 about reporting or participating in an investigation.
4 There is an exception to the Company's promise of
5 preservation of Anonymity in cases where legal safety or
6 security concerns exist. That exception is valid, and I
7 want to start there; we're not arguing with the
8 exception.

9 And also we asked and found no recollection by
10 anybody that exception had ever been applied.
11 Nevertheless there's importance not just in applying it
12 judiciously, but also making clear to reporters that the
13 exception will be tightly controlled. And that calls
14 for two things; documenting the process; we understand
15 the process and we think the people responsible for it
16 understand it. But we think documenting it and making
17 sure that documentation is available to employees is
18 important.

19 And second, we think that using the exception
20 should require senior executive approval. Not just at
21 the investigative level, if you put it. That
22 recommendation will not just help tighten up assurance

1 is that the exception will be, as it should be, very
2 limited. But it will also send a clear message to
3 employees that controls exist on the application of that
4 exception; because employees know exists, so it's
5 important to make sure that they're getting firm notice
6 that there are tight controls in review over its
7 application.

8 The last area we looked at was an examination
9 of the electronic capabilities used to manage case
10 assignment, status, supporting documentation, or
11 evidence and results, achieved through investigations.
12 We found those sound as well; they were brought online
13 after capable outside with substantial IT experience
14 were engaged. We found no reason to question their
15 quality or completeness in terms of access control when
16 they were -- were put into effect.

17 However, since implementation, management has
18 not undertaken periodic testing to assure that those
19 controls on access, what I mean by access is by people
20 who would find out sensitive information about
21 investigations without being authorized to do so. The
22 company has not undertaken periodic testing to make sure

1 that those procedures remain sufficiently sufficient to
2 avoid unauthorized access.

3 We saw no reason to think such access has
4 occurred but in our view, good practice calls generally
5 for both documentation of procedures and processes that
6 control access. And for, as I said periodic testing, as
7 with any other sensitive IT systems to make sure the
8 controls remain effective.

9 Overall, Com Ed and Exelon work together to
10 provide and execute an ethics and compliance program for
11 the Illinois electric utility it's important to see
12 their work as integrated. It's not a Com Ed
13 responsibility, and it's not an Exelon responsibility.
14 Accountability exists in both companies but the
15 manage -- the conduct of the program is a joint response
16 of Exelon's ECE group and Com Ed which I think is a good
17 thing.

18 It takes advantage of the resource access you
19 can gain by having such a large organization, and it
20 also continues to involve folks at the local utility
21 level in a way that's meaningful. And that in and of
22 itself, I think has material advantages in sending the

1 right message to employees. Instead of something that's
2 coming out of coming out of the home office somewhere.
3 This is something that's real and in their house. We
4 found dedicated, experienced, and as I said before
5 perhaps most significantly empowered, and well supported
6 leaders and managers in the compliance and ethics
7 function.

8 We also found substantial Board of director
9 engagement; and that means by both the Commonwealth
10 Edison and the Exelon board. The last two years have
11 brought significant positive change and a focus on
12 continuing improvements. Recommendations we made we
13 believe will improve an already generally sound
14 operating program.

15 I want to close by, I guess, where I started
16 by thanking the Commission for another opportunity to
17 serve. As always we thank the Staff whose support is
18 again as always was welcome and full in the conduct of
19 our work. And I also want to thank the Company's for
20 showing diligence in addressing our request. We asked a
21 lot of questions and we're known to be persistent and
22 stubborn in getting answers. They also GAVE free access

1 TO personal levels from those who support activities all
2 the way up to the CEO and members of both boards.

3 And we also found the Company being open in
4 considering different ways of moving its program
5 forward. I would say one of the things I was most
6 impressed was the notion that while there is confidence
7 that the program is sound there remains a desire to move
8 it forward. And I think that desire is sincere.

9 CHAIR SCOTT: Thank you for your presentation.
10 Mr. Rippie and Mr. Glockner would you like to provide a
11 response?

12 MR. GLOCKNER: I appreciate the opportunity to
13 provide comments and both Mr. Rippie and I are happy to
14 answer any questions that you may have regarding the
15 report or our compliance and ethics program generally.

16 So I -- I will start by saying that the, from
17 our perspective, the review by the Commission's Auditor
18 was thorough and objective. We appreciate their work
19 and recommendations, this was as important for us as it
20 was for the Commission. At both Com Ed and Exelon we've
21 taken a wide range of actions over the last three years
22 to strengthen our compliance and controls and functions.

1 And as Mr. Antonuk noted I think the results of that
2 work gets reflected in his report.

3 Although we've made significant improvements
4 over the last three years, We also have, as Mr. Antonuk
5 reported, are very conscious that we can always get
6 better. That is a commitment that is important to both
7 Com Ed and Exelon. The program can't be static. And we
8 appreciate the report makes a number of recommendations
9 for improvement. We are committed to implementing all
10 of the recommendations that the report makes.

11 I'm happy to walk through each of them
12 individually, you know, and let you know where we are
13 with respect to them. I don't know where you are timing
14 perspective.

15 CHAIR SCOTT: If you want to do that briefly,
16 that would be great.

17 MR. GLOCKNER: Sure. So I'll start with the
18 recommendations relating to financial accounting
19 practices and internal controls. There were two of
20 these, the first related to the Chief Compliance Ethics
21 Officer conducting distinct review of internal financial
22 controls as opposed to applying principally on a review

1 conducted by the internal audit. That really relates to
2 the structure of the program as it was when Mr. Antonuk
3 reviewed it. I am the Executive Vice President for
4 compliance audit and risk, but I am also Com Ed's
5 designated Chief compliance and ethics officer. In my
6 role I now oversee the internal audit program, I
7 review -- it's part of my work the internal audit
8 assessments of our internal control environment.

9 Mr. Antonuk is correct that it would be
10 advisable to document that distinct review which we will
11 do moving forward. The report also recommends that we
12 ensure the reviews and revisions on its policy and
13 procedures are completed on an established cycle. So
14 this was a point that was noted in different junctions
15 in their report. The company had fall behind with
16 respect to updates to a number of its policies. We have
17 systematically brought those up to date. And the
18 current State we are up to date with our policies and I
19 have established a process to ensure that we remain up
20 to date and alerts trigger when policies are not up to
21 date.

22 With respect to compliance and risk

1 assessments Liberty recommended we enhance the tracking
2 of our implementation recommendations arising up from
3 compliance and risk assessment. There were four
4 recommendations to communication policies.

5 One was the development of a structured plan
6 for addressing compliance and ethics communication.
7 That is a process of implementation we've been using a
8 creation of compliance and ethics calendar -- training
9 calendar. So a recommendation that Exelon should
10 deliver communications to employees through surveys and
11 focus groups to measure their effectiveness. And we do
12 plan to design participant surveys for future training
13 to help us asses the effect and quality of the training
14 programs and help strengthen them. There's a
15 recommendation that we implement the system for
16 compliance and ethics communications and employee access
17 to policies. This is another good idea. Something that
18 we will do we don't currently track web clicks on our
19 intranet resources because we are happy to implement
20 those on our compliance calendar.

21 A recommendation we continue evaluating and
22 adjusting employee engagement surveys. That's something

1 that we changed significantly with the employee
2 engagement survey that we conducted across Exelon in the
3 second half of last year. The sort of study, state of
4 questions that have been asked every year. Trends have
5 been, we have added significantly to that list of
6 questions for example Mr. Antonuk referred to which is
7 to make sure we were capturing a wider range of concerns
8 that we continue to adjust questions where necessary.

9 But we also want to make sure we keep a good
10 balance of new questions and questions we can track
11 trends. The report also noted in Mr. Antonuk's and two
12 other points with respect to this topic where it
13 emphasized the importance of follow through. One of
14 those is addressing outstanding issues with respect to
15 training. And including the use of exit interviews to
16 elicit information relevant to compliance and ethics.
17 We have a project in process with respect to doing
18 those.

19 There were two recommendations regarding
20 support for commitment to compliance and ethics. First,
21 was management should act as the superior in ensuring
22 compliance and ethics policies and procedures. Undergo

1 regular review and update, we talked about that a little
2 earlier but we are back on track with respect to that
3 and committed to staying on track there. As Mr. Antonuk
4 said in it's recommendation in compliance with policies
5 and procedures and actual practice should develop the
6 corporate compliance schedule of executive management.
7 As the report and Mr. Antonuk described it.

8 I think this is a significant matter and I can
9 assure you that I am fully independent in my functioning
10 and in my teams functioning. That's something that is
11 communicated by our management team and communicated by
12 our program as well. But as Mr. Antonuk points out, the
13 greater the width of our policies leaves a little
14 ambiguity with respect to that. Reach out and someone
15 will clarify.

16 There were two recommendations regarding
17 actions following discovery of misconduct. One of those
18 was to document the process; we're addressing exceptions
19 to the commitment to preserving the anonymity and legal
20 safety and security concerns. I think that's a good
21 call out and some Areas that need policy change. One of
22 the things that we're really focused on is strengthening

1 what I referred to as speak out culture within Com Ed
2 and Exelon. Having a culture around compliance and
3 ethics is what our company is already where everybody --
4 its everyone's responsibility not to just be compliant
5 and perform but appropriate themselves in this regard.

6 And the final recommendation was documenting
7 the investigation databank procedures that others
8 control access. We are going to in the future document
9 regular testing we just wanted to make clear that Exelon
10 and Com Ed are committed to the engagement and
11 expectation of our customers. But its also an
12 expectation that Com Ed and Exelon maintains directors
13 and avoidance. Happy to answer any questions.

14 CHAIR SCOTT: Mr. Rippie, did you have
15 anything you wanted to add?

16 MR. RIPPIE: No. We just wanted to make clear
17 that the commitment, engagement, and dedication, that
18 Mr. Glockner talked about is a reflection of the Com Ed
19 compliance management team. Well as across Exelon and
20 across the compliance and ethics organization Mr.
21 Glockner leads. As he said we're all to committed to
22 get an ethical and fully compliant organization.

1 CHAIR SCOTT: Thank you. Are there any
2 questions from my colleagues for either Com Ed or
3 Liberty? Commissioner Reddick.

4 COMMISSIONER REDDICK: No. I'm good.

5 CHAIR SCOTT: Commissioner McCabe.
6 Commissioner Carrigan.

7 COMMISSION CARRIGAN: You said you were going
8 to make all the recommendations in the report. I just
9 wondered where you were at with respect to updating
10 those practices.

11 MR. GLOCKNER: Sure so when I arrived in
12 spring of 2020, sort of as the company was negotiating
13 the sort of beginning of the work of kind of a really
14 systematic overhaul of the program. A number of
15 policies had fallen out of date. As I prioritized the
16 work for the program I made the choice just focus on
17 assessing the program make a change in focusing on what
18 I believe is kind of the highest priority. Particular
19 policies and procedures, what I would describe as
20 political compliance.

21 So we implemented, and systematically updated
22 since then a set of four policies pertaining to

1 interactions with public officials. Because I was
2 making significant changes to the program, I did have
3 prioritized some of the policies, the documented program
4 structure. Because I wanted to have a structure in
5 place and finalized before changing policies to reflect
6 what was going to work in prepping this. And really the
7 one policy that most significantly lagged needed
8 finished which is the policy describing the overall
9 structure of our compliance program. But in terms of
10 you know, clarity of operation communication to
11 employees about their own action, I think we've been
12 consistently clear throughout this period. Now that the
13 restructure is largely complete we have brought the Com
14 Ed to conformity with the policy. And we anticipate
15 keeping it.

16 COMMISSIONER REDDICK: I'd like to confirm
17 first with Mr. Antonuk is it fair to describe your audit
18 as a process audit. Your looking at the procedures in
19 place, but if I read your report correctly, you did not
20 have extensive contact with a lot of employees to gauge
21 their perception of the culture that Com Ed is trying
22 to --

1 MR. ANTONUK: That's correct we did. We did
2 look at the surveys, which is some evidence of
3 perception, and we also looked at that data
4 disaggregate, if you will by function location. So we
5 saw those indicators. And then with respect to
6 investigations we did not talk to any reporters of
7 misconduct or concern. We did talk to the
8 investigators. We looked at individual cases and kind
9 of you know pulled out pieces from the system, evidence,
10 notes of interviews, and questions. What about this
11 what about that? We looked to resolve -- we looked at
12 where there was a finding of noncompliance and what was
13 the remedy. We looked at what departments were engaged
14 and started taking significant personnel action in their
15 HR applications.

16 So you're right we looked a lot at the
17 documentation, but we looked at a lot of what I think
18 are tangible signs of how it plays out. So, we were
19 trying to look at evidence of whether the execution was
20 poor with all the expect the document expectation. We
21 did not however, do any kind of polling or sampling to
22 go to employees and kind of say, you know, are you

1 getting the message. Tell me what your values are no,
2 we didn't we did not do that.

3 COMMISSIONER REDDICK: Thank you. All right.
4 Mr. Glockner, from that perspective at your early
5 engagement in changing the processes at Com Ed. So,
6 it's been how many years that you've been working on
7 this.

8 MR. GLOCKNER: About three and a quarter;
9 three.

10 COMMISSIONER REDDICK: Having been there that
11 long can you give us any insight as to your perception
12 how the culture has or has not been effective.

13 MR. GLOCKNER: It's a big question. So what I
14 would say is that I think there is a strong realization
15 across Exelon and Com Ed that ethics issues were there.
16 In that we're seeing a lot of engagement with my team
17 and a lot of engagement with the front ended issues as
18 opposed to -- we have to find out about something and
19 have to clean up an issue. The employee engagement
20 survey that Mr. Antonuk talked about is a big reflection
21 point for us. The survey that was taken 2019; they're
22 typically done in two-year intervals. The delay was

1 sort of due to the pandemic and corporate separation.
2 So it's hard to read too much into that. What I'm
3 really interested to see is what we do the next time to
4 improve employee perceptions that they have with respect
5 to ethics.

6 With respect to issues, one of the things that
7 we did with the data, is we sort of filter or filtered
8 it by supervisor. Looked at the employee engagement
9 score with respect to specifically having this question
10 for every supervisor to give us a sense of whether there
11 were parts of the organization where there was
12 particular hot spots. We provided information to the HR
13 teams that had identified the supervisor where those
14 scores were the lowest and needed the follow up in those
15 areas. Other things the corporate scores across this
16 survey will help give us a sense of whether they're
17 working.

18 COMMISSIONER REDDICK: My final question is
19 really general. Recent experience suggest that your
20 executive team isn't enough engaged in the culture
21 enough.

22 MR. GLOCKNER: I would answer yes with respect

1 to Com Ed. Many of them are new in their roles as well.

2 CHAIR SCOTT: Thank you. Commissioner
3 Paradis.

4 COMMISSIONER PARADIS: Thank you. Just two
5 questions and one of them are specific. So I was
6 interested on page 79 of the report, seeing number six.
7 It states, "Four policies were adjusted to address risks
8 as they would apply when consulting with Public
9 Officials." Can you give us a general idea as to why
10 those adjustments were made; what was that in response
11 to?

12 MR. GLOCKNER: So, as I mentioned we rolled
13 out these four policies in early July 2020. They were
14 expansive, relatively complex, as one would do
15 procedures. The one thing I told, kind of my team, you
16 know, I was focused on reporting numbers and trends with
17 respect to the individuals reporting issues. I think
18 one of the things that matter is to have onsite
19 increased oversight. Some of those are going toward
20 violations. Others are management issues that we are
21 referring to HR.

22 MR. ANTONUK: I'm sorry. One quick finish no,

1 we did find the changes were sufficient to bring them in
2 accord with things we've seen elsewhere, and I should
3 mention at one of the places that we've seen elsewhere
4 is first energy. Where the use of charitable
5 contributions to not me but what federal authorities set
6 one according to charity was an issue. So I would say
7 we looked at this with reference to what we learned
8 there, and we did not find anything here that from you
9 know from a policy perspective, was lacking. We also
10 did some looking at kind of the execution of them, and
11 then it doesn't appear that, you know the rules just are
12 on paper are actually being followed.

13 CHAIR SCOTT: In terms of how the decisions
14 get made to determine who gets audited.

15 MR. RIPPIE: So there are regular practices
16 that channel requests for charitable contributions into
17 the corporate peers unit they review them for purpose
18 for alignment. Our policies as well as to determine
19 that there's nothing improper either of how the was made
20 for the relationship of the requester, depending upon
21 the amount of the request they are approved at different
22 levels all the way up to our chief executive officer.

1 Don't know what else I can tell you about particulars.

2 Thank you.

3 MR. ANTONUK: There a time I should mention
4 before we move the policies that relate to political
5 contributions do require disclosure of contributions
6 that are that are connected to political influence SO
7 even if it's a request for that, otherwise would look
8 like perfectly one for a normal charity if it comes from
9 someone who has a political connection that gets
10 reported and. That was our focus was really not so much
11 on how you're choosing from the vast array of legitimate
12 charity, but are you using what are you trying to use a
13 travel contribution to make a contribution that's a
14 little more self interested.

15 MR. RIPPIE: So the managers of any external
16 consultant are required to do performance twice a year.
17 Those are reviewed by my team. We prohibit the of any
18 invoice from an external boss unless there's a detailed
19 description of the services record that has been this
20 department sees them all, and ultimately up to the CEO.

21 MR. ANTONUK: I can't resist jumping unless
22 you mind? I think that was a good description of how to

1 approach this process and procedure perspective I'm go
2 tell you one it around these bases many times too many
3 companies but two things one, you heard on every
4 detected should follow on so to the extent you can
5 follow the money you diminish the chance the second
6 issue is or no the more people you have to engage to
7 make it an are to do with it so they have done things to
8 follow the money they created it a situation where more
9 people have participated.

10 CHAIR SCOTT: Thank you very much. We
11 appreciate all the time and effort in developing this
12 report. Thank you very much.

13 MR. GLOCKNER: Thanks.

14 MR. ANTONUK: Thank you.

15 CHAIR SCOTT: Continuing on with the Public
16 Utilities Agenda.

17 Item E-1 concerns a filing by Mid American to
18 modify its qualifying facility. Congregation & small
19 power production Facilities Rate (Rate QF) The filing is
20 an annual adjustment to rates in accordance with the
21 Illinois Administrative code part 430. Commission staff
22 recommends not suspending the filing.

1 Are there any objections to not suspending the
2 filing?

3 (No verbal response.)

4 CHAIR SCOTT: Hearing none, the filing is not
5 suspended.

6 Item E-2 concerns an investigation against
7 Liberty Power Holdings LLC. The order identifies 10
8 violations of the administrative code and the Public
9 Utilities Act and directs the company to pay \$184,327 in
10 fines.

11 There are substantive edits to the order.

12 First, for violation 3, the edits adopt
13 Staff's recommended penalty of \$2 for each non-compliant
14 Uniform Disclosure Statement (UDS) that was sent to
15 customers. The edits impose a total penalty of \$85,822
16 for violation 3 and increase the total penalty assessed
17 to \$227,238.

18 Second, the edits adopt Staff's Brief on
19 Exceptions language on violations 4, 8, and 10
20 justifying a \$10 per day multiplier over an 835-day
21 period to determine each penalty amount.

22 Third, the edits identify Staff's note in its

1 briefs on Exceptions that Liberty obtained and
2 maintained a performance bond as a condition for its
3 certification as an ARES.

4 Before we continue, are there any comments
5 from Commissioners? Commissioner Reddick.

6 COMMISSIONER REDDICK: Yes. Thank you
7 Chairman. While I concur in the ordered result, I am
8 concerned that the language of the order might be
9 understood to diminish the seriousness of systemic
10 violations like deficient customer contact scripts or
11 training materials. Regulated ARES firms should not act
12 on such a misrepresentation.

13 Systemic shortcomings can be root causes of
14 multiple distinct violations that follow. Commission
15 oversight is not designed to detect every individual
16 instance of a resulting violation. And the Commission's
17 response need not be limited by the number of instances
18 customers are harmed and individually detected. When
19 the evidence shows that violations reflect company
20 training or policies at odds with the Commission's
21 marketing rules, such systemic violations support
22 remedies and penalties of equal scope.

1 CHAIR SCOTT: Thank you Commissioner. Are
2 there any other comments?

3 (No verbal response.)

4 CHAIR SCOTT: Hearing none, I move the edits.
5 Is there a second?

6 COMMISSIONER MCCABE: Second.

7 CHAIR SCOTT: Are there any objections to
8 approving the edits?

9 (No verbal response.)

10 CHAIR SCOTT: Hearing none, the edits are
11 approved.

12 Are there any objections to approving the
13 order as edited?

14 (No verbal response.)

15 CHAIR SCOTT: Hearing none, the order is
16 approved as edited.

17 Items E-3 through E-5 concern applications for
18 authority to install distributed generation facilities
19 in Illinois. The orders grant the licenses, finding
20 that the applicants meet the licensing requirements.

21 Are there any objections to considering these
22 items together and approving the orders?

1 (No verbal response.)

2 CHAIR SCOTT: Hearing none, the orders are
3 approved.

4 Item E-6 concerns a complaint against Indra
5 Energy in Chicago. The order denies the complaint
6 finding that the Commission cannot award the additional
7 damages sought by the Complainant.

8 There are substantive edits to the order.

9 The edits modify the citation to the provision
10 in the Public Utilities Act that limits the Commission's
11 authority to award damages sought by the complainant.

12 I move the edits, is there a second?

13 COMMISSIONER REDDICK: Second.

14 CHAIR SCOTT: Are there any objections to
15 approving the edits?

16 (No verbal response.)

17 CHAIR SCOTT: Hearing none, the edits are
18 approved.

19 Are there any objections to approving the
20 order as edited?

21 (No verbal response.)

22 CHAIR SCOTT: Hearing none, the order is

1 approved as edited.

2 Item E-7 concerns a proceeding regarding the
3 termination of a Certificate of service authority to
4 operate as a retail agent, broker, and consultant. The
5 order suspends the Respondent's certificate for one
6 month.

7 Are there any objections to approving the
8 order?

9 (No verbal response.)

10 CHAIR SCOTT: Hearing none, the order is
11 approved.

12 Item E-8 concerns a joint petition by Ameren
13 and Shelby Electric Cooperative for approval to release
14 five residential customers from Shelby to Ameren. The
15 order grants the petition.

16 Are there any objections to approving the
17 order?

18 (No verbal response.)

19 CHAIR SCOTT: Hearing none, the order is
20 approved.

21 Items E-9 and E-10 concern complaints against
22 Ameren and Com Ed in West Frankfort and Highland Park,

1 Illinois. The parties have filed a joint motion to
2 dismiss in both Dockets indicating that all issues have
3 been resolved. The ALJ recommends granting both motions
4 with prejudice.

5 Are there any objections to hearing these
6 items together and granting the joint motions to dismiss
7 with prejudice?

8 (No verbal response.)

9 CHAIR SCOTT: Hearing none, the motions are
10 granted with prejudice.

11 Item E-11 concerns an application for
12 certification to install, maintain or repair Electric
13 Vehicle Charging Station Facilities in Illinois. The
14 order grants the certificate, finding that the applicant
15 meets the requirements.

16 Are there any objections to approving the
17 order?

18 (No verbal response.)

19 CHAIR SCOTT: Hearing none, the order is
20 approved.

21 Item E-12 concerns a motion to withdraw a
22 petition to cancel a certificate of service authority to

1 install energy efficiency measures. The ALJ recommends
2 granting the motion.

3 Are there any objections to approving the
4 order?

5 (No verbal response.)

6 CHAIR SCOTT: Hearing none, the order is
7 approved.

8 Items E-13 through E-15 concern petitions to
9 cancel Certificates of Service authority to install
10 energy efficiency measures. The orders cancel the
11 certificates finding that the cancellations will not
12 deprive Illinois residents of any necessary service and
13 are not otherwise contrary to the public interest.

14 Are there any objections to considering these
15 items together and approving the orders?

16 (No verbal response.)

17 CHAIR SCOTT: Hearing none, the orders are
18 approved.

19 Items E-16 through E-23 concern applications
20 for certificates to install energy efficiency measures
21 in Illinois. The orders grant the certificates, finding
22 that the applicants meet the requirements.

1 Are there any objections to considering these
2 items together and approving the orders?

3 (No verbal response.)

4 CHAIR SCOTT: Hearing none, the orders are
5 approved.

6 Moving onto our Gas items.

7 Item G-1 concerns a penalty against Nicor for
8 violation of part 590 of the Commission rules relating
9 to pipeline safety. Commission Staff and The Company
10 have agreed to a penalty and corrective actions the
11 Company must take. The order approves the agreement.

12 Are there any objections to approving the
13 order?

14 (No verbal response.)

15 CHAIR SCOTT: Hearing none, the order is
16 approved.

17 Item G-2 concerns Liberty's request to
18 reconcile revenues under its Gas Uncollectible
19 Adjustment Rider (Rider GUA) for the 2020 reporting
20 period. The order approves the reconciliation as set in
21 the appendix to the order, finding that the costs during
22 the reconciliation period were prudently incurred.

1 Are there any objections to approving the
2 order?

3 (No verbal response.)

4 CHAIR SCOTT: Hearing none, the order is
5 approved.

6 Item G-3 concerns Consumers Gas's application
7 for authority to incur up to \$1.5M in debt pursuant to
8 section 6-102 of the Public Utilities Act. The order
9 grants the authority.

10 Are there any objections to approving the
11 order?

12 (No verbal response.)

13 CHAIR SCOTT: Hearing none, the order is
14 approved.

15 Moving onto our Telecommunications items.

16 Item T-1 concerns application for a
17 certificate of authority to operate as a reseller and
18 facilities-based carrier of telecommunication services
19 in Illinois. The order grants the certificate, finding
20 that the applicant meets the requirements.

21 Are there any objections to approving the
22 order?

1 (No verbal response.)

2 CHAIR SCOTT: Hearing none, the order is
3 approved.

4 Moving onto our Water and Sewer items.

5 Item W-1 concerns Illinois American's
6 Application for a certificate of public convenience and
7 necessity to provide water service to certain areas in
8 DuPage County. The order grants the application finding
9 that service to the postponed area is necessary to
10 provide adequate, reliable, and efficient service and is
11 the least-cost means of serving customers.

12 Are there any objections to approving the
13 order?

14 (No verbal response.)

15 CHAIR SCOTT: Hearing none, the order is
16 approved.

17 Moving onto our Miscellaneous items.

18 Item M-1 concerns Docket 22-0485 directing
19 Ameren to perform an analysis and study of its continued
20 membership in the mid continent Independent System
21 Operator (MISO) In compliance with the final order,
22 Ameren submitted its study to the Commission on July 21,

1 2023. To provide the public with the opportunity to
2 review and respond to the study, Commission Staff has
3 submitted a report recommending the Commission initiate
4 a Notice of Inquiry (NOI). The order establishes an NOI
5 to allow parties 60 days from the date of the order to
6 submit comments on the report and 30 days thereafter to
7 submit reply comments. More information about the NOI
8 will be posted shortly on the Commission's website.

9 Are there any objections to approving the
10 order?

11 (No verbal response.)

12 CHAIR SCOTT: Hearing none, the order is
13 approved.

14 And I would just ask for anyone who has an
15 interest in this subject; it's a very important issue we
16 take very seriously and it's very important that folks
17 submit comments. We extended the time and gave the
18 opportunity for response in the hopes that we would get
19 a robust set of comments on this issue. I recognize we
20 have one study from one entity and some assumptions on
21 methodology and recognize that there may be more than
22 that. We very much are looking forward to seeing more

1 comments on this issue.

2 Moving on to our Petitions for Rehearing.

3 Item PR-1 concerns Docket 20-0330, which is
4 the Company's petition for reconciliation of its 2019
5 QIP investments. On July 14, Nicor submitted a petition
6 for rehearing and a request to stay the final order.
7 The Company seeks rehearing on the order's
8 disallowances, various accounting issues, and filings in
9 other proceedings to address future reconciliation years
10 and base rates. The ALJ recommends granting the
11 application in its entirety and granting the request to
12 stay. We will address this item through three votes.

13 First, on the petition for rehearing, I will
14 call roll call on this item. If you are in favor of
15 granting the petition on rehearing please say, "aye" and
16 if you are opposed say, "Nay."

17 CHAIR SCOTT: Commissioner Carrigan.

18 COMMISSIONER CARRIGAN: Aye.

19 CHAIR SCOTT: Commissioner McCabe?

20 COMMISSIONER MCCABE: Aye.

21 CHAIR SCOTT: Commissioner Reddick?

22 COMMISSIONER REDDICK: Nay.

1 CHAIR SCOTT: Commissioner Paradis?

2 COMMISSIONER PARADIS: Nay.

3 CHAIR SCOTT: I vote Nay. The Nays have it
4 and the petition is denied.

5 Under the Commission's Authority in Section
6 10-112 of the Public Utilities Act, the Commission
7 issues an Amendatory order that modifies the final
8 order's appendix to change the calculation of interest
9 for factor 0 refunds to a simple interest calculation.
10 The order also amends the appendix to modify the
11 ADIT-Federal and ADIT-State for adjusted Net QIP and
12 adjusted net depreciation to represent a sum total of
13 all adjusted investments.

14 Are there any objections to approving the
15 amendatory order?

16 (No verbal response.)

17 CHAIR SCOTT: Hearing none, the order is
18 approved.

19 Third, the Company seeks to stay the
20 effectiveness of the final order in this Docket during
21 the term of the rehearing period. Company argues that
22 it will suffer irreparable harm if the stay is not

1 granted. The Commission disagrees and the Company is
2 directed to remove the disallowed 2019 QIP plant from
3 its 2020 and 2021 QIP reconciliations as well its
4 pending rate case.

5 Are there any objections to denying the motion
6 to Stay?

7 (No verbal response.)

8 CHAIR SCOTT: Hearing none, the motion is
9 denied.

10 Before we continue are there any comments from
11 Commissioners? Commissioner McCabe.

12 COMMISSIONER MCCABE: This is the first time
13 the Commission has disallowed QIP expenses.
14 The Public Utility Act states, "The petition filed by
15 the natural gas utility shall include testimony and
16 schedules that support the accuracy and the prudence of
17 the qualifying infrastructure investment for the
18 calendar year being reconciled."

19 It appears that over time, the parties have
20 become less diligent in making their case, with the
21 expectation that all expenses will be passed through via
22 the QIP rider. In this Docket, the record was

1 insufficient in some cases to make a determination of
2 whether some or all of the project's expenses were
3 prudent.

4 The AG was the only intervenor. In some
5 instances, their requests for specific information to
6 determine prudence were rebuffed; QIP reconciliations
7 are technical cases. Having all stakeholders engaged
8 with the needed information will help the review
9 process.

10 On page 30 of its rehearing request, Nicor
11 asks to provide additional evidence, referring to the
12 Commissions "New burden of proof standard." This is not
13 a new standard. This will help the review process. And
14 provide a better record and fuller discussion in future
15 QIP cases.

16 CHAIR SCOTT: Thank you Commissioner McCabe.
17 I have some comments as well.

18 The Commission's decisions, in both the final
19 order and in response to Nicor's petition for rehearing
20 reaffirms the Commission's commitment to reviewing the
21 prudence of infrastructure installed authorized under
22 Section 9-220.3 of the Public Utilities. That while

1 this provision of the act is subject to sunset. At the
2 end of this year, the Commission will continue to review
3 plant investments made by all natural gas utilities
4 under this provision to ensure that customers only pay
5 for prudently incurred costs.

6 I also note that in future QIP proceedings,
7 the initial burden of proof lies on the company to
8 demonstrate that costs were reasonably and prudently
9 incurred. At the same time, it is imperative that all
10 parties work to develop a complete and robust record to
11 inform the Commission's decisions. The natural gas
12 systems in this state impact the lives of all
13 Illinoisans and I encourage all interested parties to
14 engage at the Commission in future proceedings.

15 As energy costs continue to increase for
16 customers and as Illinois embarks on an energy
17 transition to mitigate the effects of climate change,
18 the review of natural gas investments has never been
19 more critical. It is the Commission's duty to balance
20 affordability and reliability for natural gas customers.
21 And I look forward to ensuring those principles are met
22 in future QIP dockets and rate cases.

1 Any other comments from Commissioners?

2 Commissioner Reddick.

3 COMMISSIONER REDDICK: Thank you Mr. Chairman.

4 With several incoming Commissioners, we have
5 recently had a number of opportunities to introduce new
6 members of Commissioners' offices. Today, I am pleased
7 to welcome Julie Ward. Julie joined the Commission as
8 one of my advisers about 2 1/2 weeks ago. Actually, I
9 am more than pleased at her arrival-I am relieved.
10 After several months at less than full strength, my team
11 is complete. Our workload is already down from
12 overwhelming to merely challenging.

13 Julie came to the Commission from the
14 Northwestern University Energy and Sustainability
15 Masters Degree Program. Before that, she took her
16 undergraduate biology degree and artistic talent to the
17 University of Cincinnati's Cincinnati Law School, then a
18 stint in a law firm practice; ultimately, she chose
19 public service here at the Commission.

20 Julie joins an extraordinary cadre of advisors
21 who support the Commissioners, we take every chance we
22 get to acknowledge their efforts and their importance to

1 our work. So welcome Julie. I anticipate that the
2 addition of your perspective, insights, and challenges
3 will make our team even better.

4 CHAIR SCOTT: The Commission welcomes you
5 Julie.

6 Moving on to other business.

7 Items O-1 and O-2 concern approval of Batches,
8 contracts, and confirmations under the Illinois
9 Adjustable Block Program and Solar For All Program.

10 Are there any objections to considering these
11 items together and approving the Program Administrator's
12 Submissions?

13 (No verbal response.)

14 CHAIR SCOTT: Hearing none, the submissions
15 are approved.

16 Item O-3 concerns joint comments of the
17 Illinois Commerce Commission and the New Jersey Board of
18 Public Utilities in relation to FERC's PJM capacity
19 Market forum in Docket AD23-7-000. The comments provide
20 perspective for FERC to consider relating to generation
21 retirements within PJM, lessons learned from Winter
22 Storm Elliot, generator compensation, and the promptness

1 of PJM's capacity auctions in the future.

2 Are there any objections to authorizing the
3 submission of the Commission's Comments in FERC's
4 proceeding?

5 (No verbal response.)

6 CHAIR SCOTT: Hearing none, the filing of the
7 Comments is authorized.

8 Item O-4 was already discussed earlier and
9 this concludes our Public Utilities Agenda.

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12 (Which were all the proceedings had in
13 the above-entitled cause on this date.)

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