

From: j.russow@shawlink.ca
Sent: Thursday, September 29, 2005 12:00 PM
To: Commission Secretary BCUC:EX
Subject: eNorthernBC: A postcard from a concerned BC citizen re: Sale of Terasen Gas

KMI_TERASEN Acquisition– Exhibit E-70

I am writing to protest the sale of Terasen Gas to the US company Kinder Morgan. The sale must be approved by the BC Utilities Commission which will hold hearings on the sale and so it is still possible to stop.

My Specific Concern:

The Canadian government and the BC government are bound by obligations under the 1992 Framework Convention on Climate Change, and the Convention on Biological Diversity. Both these conventions will be violated by the sale of Terasen Gas. The corporations cannot argue that Canada must concede because of NAFTA. The Canadian government, in its 1992 publication Environmental Assessment Review of NAFTA affirmed the following:

"In other words these international environmental or conservation agreements will take precedence over the NAFTA

Dr. Joan Russow - Global Compliance Research Project
1230 St. Patrick St.
Victoria, B.C V8S 4Y4

Copies To:
The Premiere of BC
BC Utility Commission
Industry Canada-Investment Review Division
Bob Simpson, MLA, Cariboo North
Richard Neufeld - BC Minister of Energy, Mines and Petroleum Resources
Vancouver Sun
Vancouver Province
Victoria Times Colonist
Prince George Citizen
Prince George Free Press
Quesnel Cariboo Observer
The Quesnel Advisor
Williams Lake Tribune
100 Mile House Free Press

* Sent from the [Terasen Gas Petition](#) on eNorthernBC.com.

From: Joan Russow [j.russow@shawlink.ca]
Sent: Friday, September 30, 2005 9:05 PM
To: Commission Secretary BCUC:EX
Subject: RE exhibit Aiv need for oral hearing and public process

KMI - Terasen Acquisition
Exhibit E-70

RE: Terasen: Intervener meeting held to have input into the process for accessing the application made by the Kinder group .I would also hope that would you included this submission along with Exhibit A. iv.

Robert J. Pellatt
Commission Secretary
BC Utilities Commission
Box 250
Sixth Floor, 900 Howe Street
Vancouver, BC V6Z 2N3
Telephone: 604-660-4727
Facsimile: 604-660-1102
Email: commission.secretary@bcuc.com

Dear Robert Pellatt,

I am responding to the letter in which you referred to Exhibit A 4- the letter to the Mr. Cassidy the Lawyer for the Applicant; this letter was supposedly an overview of the Conference of Interveners on September, 9th, 2005. In the letter you stated the following: "Interveners such as Corky Evans, MLA and the Canadian Action Party supported oral submissions and cross examination While other interveners such as the lower mainland large Gas Users, Commercial Energy Consumers Assoc. of B.C. and BC Old Age Pensioners did not take a position."

It is important to fairly represent a public consultation process; I believe that Exhibit A IV. misrepresented the concerns of the majority of interveners about the compressed time-line, and about the need to have some form of oral public process whether a town hall or a more formal oral hearing.

I understand that the consultation meeting was about the nature of the consultation process so I will not refer to the concerns expressed, by the interveners, about the environment, about deep integration with the US, about scarcity of resources, about overconsumption, about global warming. etc.

You initially called for submissions "with respect to whether or not there should be an oral or written proceeding," It was only in response to the representative from the Council of Canadians that you clarified the distinction between an oral hearing- with opportunity for cross examination, and public hearing or town hall meeting - with no opportunity for cross examination.

I appreciate that you made public the transcripts from the consultation with the Interveners. After reading the transcripts, I have concluded the following. Apart from the lawyer representing Terasen, the representative from Terasen, the representative from the Ministry of Energy, Mines and Petroleum , and Resources; and Inland Industrials, almost all interveners expressed dismay at the compressed time line, and called for an extension up to as much 3 months. (17 participants) A large proportion of the interveners

called for an oral public process of some kind (15) , and many of those who appreciated your distinction between a public process and a oral hearing supported an oral hearing with the opportunity to cross examine. (13)

POSITIONS TAKEN:

A. Against or indifferent to public oral meetings and oral hearing and cross examination, and compressed time reasonable, support for October 18 stakeholder meeting

- MR CASSIDY-the lawyer acting for the applicants declared that there was no dispute about the facts, and that there should be no oral hearing. , , , little gained by an oral hearing involving cross-examination. Where there are issues of fact which may be in dispute, sometimes an oral hearing is appropriate, but what we are dealing with here is not a factual dispute,

- MR. BIERLMEIER: appearing for the Ministry of Energy, Mines and Petroleum Resources. The Ministry submits no position on item 1 of Exhibit A-3 and places its trust in the Commission that it will determine which process is best suited to the application. Thank you.

- BURSEY INLAND INDUSTRIALS no comment about procedure

- Mr. JOHNSON acting for Terasen CITED Section 54 of the Utilities Commission Act and that section of the Act does not have a requirement for a hearing process

B. indifferent to oral or written [may not appreciate distinction] but concern about time

-MR. GATHERCOLE: Thank you, Mr. Chairman. With respect to the oral or written hearing, BCOAPO et al is prepared to go either way. there appears to be less so with respect to this application, ..not sufficient consultation process ...seems to me regardless of whether we have a written proceeding, an oral hearing or the hybrid process, the suggested time table is to short, and as I submitted earlier, it clearly is driven, and the applicant's position and Mr. Johnson's position is driven by the need to have a decision before the shareholders' meeting, and I think that -- .. The idea, for example, that was suggested of, well if you have the hybrid process, you know, there won't be a need for written submissions. Of course, there are a number of interveners who would not be attending those town hall meetings, and I think it's important that the process and the timetable meet the requirements of this Commission and not just the applicant.

B. Concern about compression of time: but not process

MR. WEAFFER: LOWER MAINLAND LARGE GAS USERS There's no way we'd see a process put forward and impose this kind of deadline [October 18] on the Commission in that environment, and I don't see any reason why it should be here. That date was set by the company. That date was assessed by management as a reasonable date. It's not a reasonable date. and we're yet to hear any credible reason as to why that's required, and that October 18th date

Mr. Yardley city of Abbotsford

I would agree with the comments earlier made that the process does appear TO BE A LITTLE COMPRESSED.

C. Concern about compressed time, and support for written and oral public meeting and oral hearing but no cross-examination

MS. BROWN: Canadian Office and Professional Employees Union, Local we submit that the commission should allow for both written and oral submissions to provide for a more careful review to assist you

[comment before the distinction between public town hall and oral hearing.] w would prefer the public town hall meeting, oral hearing, as opposed to oral submission. I don't think we have interest in cross-examination. ...both written submissions and town hall meetings, and while being cognizant of the time frame, as set out by KMI, but not driven by it.

D Concern about time line, and support for written and oral public meeting.

MR. DOWNEY: Democratic Reform Party of B.C. Proceeding Time 10:24 a.m.

: As I'm sure the Commission can see, I believe in written submissions. I don't believe that a timeline, as indicated by Mr. Cassidy, of KMI, with respect to their shareholders bears any relevance on this process. it is mandatory that this be taken to the public in town hall . I seek to make both written and oral presentations

E. Concern about compressed time, and support for written and oral, including (public meetings and oral hearing with opportunity for cross examination)

MS. MAXEY Council of Canadians

Council of Canadians would like to recommend that we have an opportunity to cross-examine. This goes directly to the insufficiency of the record that we have placed before us now. The compressed time line is also of deep concern to us.

MR. SIMPSON: (NDP) I would relate to and would encourage you to not just do an oral hearing, and I do believe that the town hall process - is an important one, and I believe it is important because I think that as this agreement -- as this transaction begins to unfold more and more British Columbians will be looking at the question of whether this is good for British Columbia. And they need an opportunity to voice that concern in an informal -- a more informal way than might come through the more structured procedures.

MR. EVANS: To allow cross examination by people who may not be comfortable in the literate form and may not have the money to afford lawyers to do it for them. And for goodness sakes to get out of this wonderful town and go to the place where they actually take the gas out of the grounds and go to our towns where they use it to smelt lead and make pulp.

MS. FOGAL: Canadian Action party. Clearly, there has to be as much oral presentation to you as is possible. I agree that when you have masses of paper to read somebody has -- you will read everything but it's -- the impact on you is different when you hear certain things. You need, in my view, the combination of written, and certainly an awful lot of oral. ...And it's on that written material in particular that there would be the cross-examination and there absolutely has to be cross-examination. ...the most important hearings you're going to have to deal with in terms of its impact as it's perceived on Canadians as a whole. It's not just British Columbia. ...They say to you there are no facts in dispute. Well, with respect, that would not be what the massive numbers of Canadians would say is the issue. ... The October 18th date is absolutely unreasonable...

Marshall James individual. I think I've had something between 300 and 350 letters come through as a privilege intervener. And invariably they're against this takeover of Terasen by the Kinder group. We haven't got time today to go over them, ,, ,hey seem to be represented by counsel. The Kinder group the same way. Why isn't Mr. -- the Kinder President up here this morning and listening to peoples' concerns about his plans to take over Terasen? ...You know one of the problems with cross examination if we are going to be faced to cross

examination from professional counsel will be that we should have the opportunity or there should be a pool of lawyers available to interveners so that they can defend themselves against these high powered attorneys that are representing the two groups here, Terasen and Kinder.

MR. ANDERSON: [INDIVIDUAL] Speaking on the matter of the hearing process I believe that we should include oral hearings as part of the process. I have a couple of reasons that maybe haven't been fully stated by other people here. One of them, I think is in a written process you submit, you know, a question and get a response in writing. MR. ANDERSON: Regarding the time table I definitely feel that it is too short. For one of the reasons I gave previously that a lot of this process has occurred over the month of August when many of B.C. public are on vacation and not fully aware of what's going on. I also believe that the hybrid process is important.

MR. SYKES: Mr. Chair, I appreciated your comments on the oral submission. I am in favour of the oral public hearing with the full cross examination and transcribed material.

REVEREND MEAKES I would strongly affirm the thought that this process should be comprehensive and that we would begin with written submissions. ... not have a great deal of credibility unless it can be cross examined in an oral process so that the Commission can see clearly the merits of whatever written material are submitted.

MR. DUNNET: I speak as a private citizen, but also as a member of the World Federalists, ... I wonder how many people here understand the term "the hubbart peak". I don't know whether I could ask them to raise their hands, but if they don't understand that term, then they don't understand the fundamentals of what we are facing at this point in time.

MR. HELTON: I definitely would go for an oral submissions from the public. I think that we -- I agree with many of the speakers today. We should slow this down and look at it very carefully, and if I may have a show of hands, if a decision was made today

Mr. Helton, I'm not going to permit you to do that.....
I agree with the timetable he's proposing and I agree with Ms. Fogal that we should have two rounds of information requests and perhaps even the Commissioner would consider delaying the

MR. WESSLER: Mr. Chairman, I would like to say that I'm in favour of oral hearing and cross-examination. With regard to the town hall meetings, would you classify the town hall meetings which were held so far by Terasen/Kinder as town hall meetings or were they just open houses?. In the context of my comments about town hall meetings, I was referring to a meeting at which presentations were made to this Panel. ... would like to add something, that if there is a compromise between the company's position and the public hearing process must -- can be accommodated, then I would be in favour of oral argument following an oral hearing.

MR. ASKEW Council of Canadians.with respect to the regulatory process and the discussion that is taking place on written and oral submissions and town hall meetings, we would like to see a full public process that involves town hall meetings held in regional centres around the province, and we would be in favour of including written submissions and the opportunity for cross-examination. But as I said earlier, our main focus is on urging you to provide the opportunity for citizens around the province to have input.

MS BALDAZZI. I would suggest over three months before I am your typical person and I know that life is very difficult as is to get the kids out to school and all that. So over three months I would

suggest definitely. And we have to allow for cross-examination. It's part of our justice system, and it needs to be part of any just process of such great importance as this, and this is being a young Canadian, our future is potentially at stake here. And of course you have to allow cross-examination, especially when you have very intelligent people working for the company,

I would concur with those who call for an extension of time, for written and oral submission, with extensive, comprehensive and widespread oral public processes, and with an oral hearing and opportunity for cross examination.

Yours sincerely,

Dr. Joan Russow

I am also concerned that some of the following interveners did not attend the meeting: The following is a list of invitees and participants:

MR. JOHNSON: Terasen Gas Inc.
MR. BURSEY: Inland Industrials, , four customers, Weyhausser, Tek-Cominco, Canadian Forest Products and Celgar. TheWest Fraser Mills
MR. WEAFFER: Lower Mainland Large Gas Users Association.
NO RESPONSE; Direct Energy Marketing Limited
NO RESPONSE Railex Energy Group
NOT ATTENDING Business Council of British Columbia that fact for the record. Ministry of Energy, Mines and Petroleum Resources?
MR. BIERLMEIER: Ministry of Energy, Mines and Petroleum Resources.
JAMES. YARDLEY City of Abbotsford?
NO RESPONSE; District of Chetwynd?
MR. GATHERCOLE: B.C. Old Age Pensioners Organization, Council of Senior Citizens Organizations, B.C. Coalition of People with Disabilities, Federated Anti-Poverty Group, End Legislative Poverty and Tenants Rights Action Coalition.
BROWN; Canadian Office and Professional Employees Union, Local 378.
REPRESENT THE MEMBERS AT TERASEN GAS
MR. ASKEW: Council of Canadians (Vancouver) Chapter.
MS. MAXEY Council of Canadians Powell River Chapter.
SHANE SIMPSON, MLA, Vancouver Hastings. Environment Critic for Official Opposition
CORKY EVANS MLA for Nelson Ceston and the Energy Critic for the Official Opposition
BRIAN DOWNEY Democratic Reform Party of British Columbia?
United Members of Canadian U-Grow Co-op, a co-op of farmers and consumers,
CONNIE FOGAL leader of the Canadian Action Party.
MARSHALL JAMES: I represent modest and small Terasen investors,
SAM ANDERSON: Individual
NO RESPONSE Stephen Hanison-Nagel
RUSSELL SYKES Individual
ROSS DUNNET;
REVEREND MEAKES
NO RESPONSE; Andy Shadrack
GREG HELTON individual
MR WESSLER; Individual
MS. BALDAZZI: individual

From: Joan Russow [j.russow@shawlink.ca]
Sent: Saturday, October 01, 2005 11:21 AM
To: Commission Secretary BCUC:EX
Subject: REVISED SUBMISSION ON EXHIBIT A IV

KMI - Terasen Acquisition
Exhibit E-70

RE: Terasen: Intervener meeting held to have input into the process for accessing the application made by the Kinder group .I would also hope that would you included this submission along with Exhibit A. iv.

Robert J. Pellatt
Commission Secretary
BC Utilities Commission
Box 250
Sixth Floor, 900 Howe Street
Vancouver, BC V6Z 2N3
Telephone: 604-660-4727
Facsimile: 604-660-1102
Email: commission.secretary@bcuc.com

Dear Robert Pellatt,

I am responding to the letter in which you referred to Exhibit A 4- the letter to the Mr. Cassidy the Lawyer for the Applicant; this letter was supposedly an overview of the Conference of Interveners on September, 9th, 2005. In the letter you stated the following:
"Interveners such as Corky Evans, MLA and the Canadian Action Party supported oral submissions and cross examination While other interveners such as the lower mainland large Gas Users, Commercial Energy Consumers Assoc. of B.C. and BC Old Age Pensioners did not take a position."

It is important to fairly represent a public consultation process; I believe that Exhibit A IV. misrepresented the concerns of the majority of interveners about the compressed time-line, and about the need to have some form of oral public process whether a town hall or a more formal oral hearing.

I understand that the consultation meeting was about the nature of the consultation process so I will not refer to the concerns expressed, by the interveners, about the environment, about deep integration with the US, about scarcity of resources, about overconsumption, about global warming. etc.

You initially called for submissions "with respect to whether or not there should be an oral or written proceeding," It was only in response to the representative from the Council of Canadians that you clarified the distinction between an oral hearing- with opportunity for cross examination, and public hearing or town hall meeting - with no opportunity for cross examination.

I appreciate that you made public the transcripts from the consultation with the Interveners. After reading the transcripts, I have concluded the following. Apart from the lawyer representing Terasen, the representative from Terasen, the representative from the Ministry of Energy, Mines and Petroleum , and Resources; and Inland Industrials, almost all interveners expressed dismay at the compressed time line, and called for an extension up to as much 3 months. (17 participants) A large proportion of the interveners called for an oral public process of some kind (15) , and many of

those who appreciated your distinction between a public process and a oral hearing supported an oral hearing with the opportunity to cross examine. (13)

POSITIONS TAKEN:

A. Against or indifferent to public oral meetings and oral hearing and cross examination, and compressed time reasonable, support for October 18 stakeholder meeting

- MR CASSIDY-the lawyer acting for the applicants declared that there was no dispute about the facts, and that there should be no oral hearing. , , , little gained by an oral hearing involving cross-examination. Where there are issues of fact which may be in dispute, sometimes an oral hearing is appropriate, but what we are dealing with here is not a factual dispute,

- MR. BIERLMEIER: appearing for the Ministry of Energy, Mines and Petroleum Resources. The Ministry submits no position on item 1 of Exhibit A-3 and places its trust in the Commission that it will determine which process is best suited to the application. Thank you.

- BURSEY INLAND INDUSTRIALS no comment about procedure

- Mr. JOHNSON acting for Terasen CITED Section 54 of the Utilities Commission Act and that section of the Act does not have a requirement for a hearing process

B. indifferent to oral or written [may not appreciate distinction] but concern about time

-MR. GATHERCOLE: Old Age Pensioners Organization, Council of Senior Citizens Organizations, B.C. Coalition of People with Disabilities, Federated Anti- Poverty Group, End Legislative Poverty and Tenants Rights Action Coalition. BCOAPO With respect to the oral or written hearing, BCOAPO et al is prepared to go either way. there appears to be less so with respect to this application, ..not sufficient consultation process ...seems to me regardless of whether we have a written proceeding, an oral hearing or the hybrid process, the suggested time table is to short, and as I submitted earlier, it clearly is driven, and the applicant's position and Mr. Johnson's position is driven by the need to have a decision before the shareholders' meeting, and I think that -- .. The idea, for example, that was suggested of, well if you have the hybrid process, you know, there won't be a need for written submissions. Of course, there are a number of interveners who would not be attending those town hall meetings, and I think it's important that the process and the timetable meet the requirements of this Commission and not just the applicant.

B. Concern about compression of time: but not process

MR. WEAVER: LOWER MAINLAND LARGE GAS USERS There's no way we'd see a process put forward and impose this kind of deadline [October 18] on the Commission in that environment, and I don't see any reason why it should be here. That date was set by the company. That date was assessed by management as a reasonable date. It's not a reasonable date. and we're yet to hear any credible reason as to why that's required, and that October 18th date

MR. YARDLEY city of Abbotsford

I would agree with the comments earlier made that the process does appear TO BE A LITTLE COMPRESSED.

C. Concern about compressed time, and support for written and oral public meeting and oral hearing but no cross-examination

MS. BROWN: Canadian Office and Professional Employees Union, Local we

submit that the commission should allow for both written and oral submissions to provide for a more careful review to assist you [comment before the distinction between public town hall and oral hearing.] w would prefer the public town hall meeting, oral hearing, as opposed to oral submission. I don't think we have interest in cross-examination. ...both written submissions and town hall meetings, and while being cognizant of the time frame, as set out by KMI, but not driven by it.

D Concern about time line, and support for written and oral public meeting.

MR. DOWNEY: Democratic Reform Party of B.C. Proceeding Time 10:24 a.m.

: As I'm sure the Commission can see, I believe in written submissions. I don't believe that a timeline, as indicated by Mr. Cassidy, of KMI, with respect to their shareholders bears any relevance on this process. it is mandatory that this be taken to the public in town hall . I seek to make both written and oral presentations

E. Concern about compressed time, and support for written and oral, including (public meetings and oral hearing with opportunity for cross examination)

MS. MAXEY Council of Canadians
Council of Canadians would like to recommend that we have an opportunity to cross-examine. This goes directly to the insufficiency of the record that we have placed before us now. The compressed time line is also of deep concern to us.

MR. SIMPSON: (NDP) I would relate to and would encourage you to not just do an oral hearing, and I do believe that the town hall process - is an important one, and I believe it is important because I think that as this agreement -- as this transaction begins to unfold more and more British Columbians will be looking at the question of whether this is good for British Columbia. And they need an opportunity to voice that concern in an informal -- a more informal way than might come through the more structured procedures.

MR. EVANS: (NDP) To allow cross examination by people who may not be comfortable in the literate form and may not have the money to afford lawyers to do it for them. And for goodness sakes to get out of this wonderful town and go to the place where they actually take the gas out of the grounds and go to our towns where they use it to smelt lead and make pulp.

MS. FOGAL: Canadian Action party. Clearly, there has to be as much oral presentation to you as is possible. I agree that when you have masses of paper to read somebody has -- you will read everything but it's -- the impact on you is different when you hear certain things. You need, in my view, the combination of written, and certainly an awful lot of oral. ...And it's on that written material in particular that there would be the cross-examination and there absolutely has to be cross-examination. ...the most important hearings you're going to have to deal with in terms of its impact as it's perceived on Canadians as a whole. It's not just British Columbia. ...They say to you there are no facts in dispute. Well, with respect, that would not be what the massive numbers of Canadians would say is the issue. ... The October 18th date is absolutely unreasonable...

MARSHALL JAMES INDIVIDUAL . I think I've had something between 300 and 350 letters come through as a privilege intervener. And invariably they're against this takeover of Terasen by the Kinder group. We haven't got time today to go over them, ,, ,hey seem to be represented by counsel. The Kinder group the same way. Why isn't Mr. -- the Kinder President up here this morning and listening to

peoples' concerns about his plans to take over Terasen? ...You know one of the problems with cross examination if we are going to be faced to cross examination from professional counsel will be that we should have the opportunity or there should be a pool of lawyers available to interveners so that they can defend themselves against these high powered attorneys that are representing the two groups here, Terasen and Kinder.

MR. ANDERSON: [INDIVIDUAL] Speaking on the matter of the hearing process I believe that we should include oral hearings as part of the process. I have a couple of reasons that maybe haven't been fully stated by other people here. One of them, I think is in a written process you submit, you know, a question and get a response in writing. MR. ANDERSON: Regarding the time table I definitely feel that it is too short. For one of the reasons I gave previously that a lot of this process has occurred over the month of August when many of B.C. public are on vacation and not fully aware of what's going on. I also believe that the hybrid process is important.

MR. SYKES: (INDIVIDUAL) Mr. Chair, I appreciated your comments on the oral submission. I am in favour of the oral public hearing with the full cross examination and transcribed material.

REVEREND MEAKES (INDIVIDUAL) I would strongly affirm the thought that this process should be comprehensive and that we would begin with written submissions. ... not have a great deal of credibility unless it can be cross examined in an oral process so that the Commission can see clearly the merits of whatever written material are submitted.

MR. DUNNET: (INDIVIDUAL) I speak as a private citizen, but also as a member of the World Federalists, ... I wonder how many people here understand the term "the hubbart peak". I don't know whether I could ask them to raise their hands, but if they don't understand that term, then they don't understand the fundamentals of what we are facing at this point in time.

MR. HELTON: (INDIVIDUAL) I definitely would go for an oral submissions from the public. I think that we -- I agree with many of the speakers today. We should slow this down and look at it very carefully, and if I may have a show of hands, if a decision was made today

Mr. Helton, I'm not going to permit you to do that.....
I agree with the timetable he's proposing and I agree with Ms. Fogal that we should have two rounds of information requests and perhaps even the Commissioner would consider delaying the

MR. WESSLER: (INDIVIDUAL) Mr. Chairman, I would like to say that I'm in favour of oral hearing and cross-examination. With regard to the town hall meetings, would you classify the town hall meetings which were held so far by Terasen/Kinder as town hall meetings or were they just open houses?. In the context of my comments about town hall meetings, I was referring to a meeting at which presentations were made to this Panel. ... would like to add something, that if there is a compromise between the company's position and the public hearing process must -- can be accommodated, then I would be in favour of oral argument following an oral hearing.

MR. ASKEW Council of Canadians.with respect to the regulatory process and the discussion that is taking place on written and oral submissions and town hall meetings, we would like to see a full public process that involves town hall meetings held in regional centres around the province, and we would be in favour of including written submissions and the opportunity for cross-examination. But as I said earlier, our main focus is on urging you to provide the opportunity for citizens around the province to have input.

MS BALDAZZI. (INDIVIDUAL) I would suggest over three months before I am your typical person and I know that life is very difficult as is to get the kids out to school and all that. So over three months I would suggest definitely. And we have to allow for cross-examination. It's part of our justice system, and it needs to be part of any just process of such great importance as this, and this is being a young Canadian, our future is potentially at stake here. And of course you have to allow cross-examination, especially when you have very intelligent people working for the company,

I would concur with those who call for an extension of time, for written and oral submissions, with extensive, comprehensive and for both a widespread oral public processes, and an oral hearing and opportunity for cross examination.

Yours sincerely,

Dr. Joan Russow