

BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

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IN THE MATTER OF: :

STANDARD MARKET DESIGN :

ENVIRONMENTAL ASSESSMENT :

SCOPING MEETING :

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Commission Hearing Room 2 C
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C.

Monday, August 12, 2002

The above-entitled matter came on for scoping meeting,
pursuant to notice, at 2:00 p.m., Charles S. Whitmore,
presiding.

APPEARANCES:

CHRIS MAC CRACKEN

JAMES TURNURE

WILLIAM MERONEY

NILS NICHOLS, ESQ.

MARK SCHAFER, ESQ.

ALISON SILVERSTEIN

TAMRAH SEMEGA

ALSO PRESENT:

JANE W. BEACH, Court Reporter

P R O C E E D I N G S

(2:00 p.m.)

MR. WHITMORE: We're going to get started in a moment or two, but let me finish passing out some handouts, first.

(Pause.)

Can everybody hear me? Okay, great. I think we can get started, whenever you're ready. I want to welcome all of you to the scoping session for the environmental assessment on FERC's Standard Market Design Rule. It's great to see such a large crowd here in the middle of the afternoon.

(Laughter.)

MR. WHITMORE: Let me go through some logistics to start with, and then I have a brief set of comments to introduce, and then I will go forward from there. First of all, joining me up here are two folks from ICF, who are the contractors on this, also on the cost-benefit study, Chris MacCracken, Jim Turnure, and then also from FERC, Bill Meroney.

And we have a couple of attorneys from FERC to keep us in line here, Miles Nichols, and Mark Schafer, who's not going to do anything, okay.

We do have a court reporter here, and this will be transcribed, and will be made available to everybody. I

believe the deal is that if you're willing to pay, you can get it tomorrow or the next day, and otherwise you have to wait ten days, and it will be on the website.

We have microphones, and, aside from the trouble that I had with this one, we have two microphones on either side here, and I would like to ask you that when you want to speak, to come on up and use the microphones. Please start off by identifying yourself and your organization, and if you have it, give the court reporter a card so she'll know who you are.

Let's see, we have three speakers pre-registered, Beth Nagusky, and Terry Black and James Loewen, and if there's anybody else who wants to speak, this is a small enough crowd that I don't think we have to be terribly formal about it.

Let's let the three of them go first, and then whoever else wants to can speak as well. Are there any questions before we get started?

(No response.)

MR. WHITMORE: No, okay.

I want to quickly go through some things about what we're thinking about this process, and then that will serve as background for you going forward. And that's this handout with the double staple and so forth. I've gotten allergic to using the television screen, so I apologize on

that.

Standard market design grows out of the Commission's strategic plan, and if you haven't seen it, we've managed to put it down on a nice dinner place mat suitable for children, and you can find it on our website.

There are three substantive goals or challenges on that, and they are: Promote a secure, high-quality, environmentally-responsible energy infrastructure through consistent policies; foster nationwide competitive energy markets as substitute for traditional regulation; and protect customers and market participants through vigilant, fair oversight of transitioning energy markets.

The Commission believes that standard market design works to achieve all three of those basic strategic objectives of the Commission. And for that reason, it is, by a considerable measure, the most important initiative that we're undertaking right now.

What would do? Next page. Let's -- this is just a few things it does. I mean, there are probably either -- there are 600 pages in the NOPR, and I'm not going go through all of them, but among the key things it does is to eliminate transmission discrimination by making sure that all transmission is handled by independent companies who don't have an interest in generation.

It sets up good day-ahead and real-time markets,

and that means that there will be good price signals, and that, in turn, means that people will value the current stock of resources properly and will generate when they should generate, and not when they shouldn't. It also means that there will be price signals for where to locate new generation, and new transmission and so forth.

It uses locational market pricing to manage congestion. That's very important because there are places in the country where people have set up to what amount to generation pockets, and in the future, it should be clear ahead of time, what the transmission issues are going to be involved in doing that.

It mitigates very high prices and market power, and that's very important in the wake of the California situation.

Perhaps in some ways, the most important aspect of it is that it enables a long-term contract market by making sure that there is a very good short-term market to settle against.

And the only way to judge long-term value is to have something that you can believe in, day-by-day, hour-by-hour, to settle against, so that's a very important part, because we believe that long-term contracting is an absolutely essential feature of how this industry needs to evolve.

And, finally, it lowers costs by standardizing an awful lot of the market, so that people don't have to invent eight or ten or 15 or 30 different systems to deal with different markets in different parts of the country.

Now, standard market design, of course, is absolutely the best thing since sliced bread, but it is also the third of a trilogy of Orders that the Commission has done on competitive energy markets. The first one was Order 888, which required functional unbundling of transmission and was our first effort to get independence on the grid -- well, second, but the first big one.

Order 2000 strongly encouraged people to join regional transmission organizations, and, finally, there is this one, standard market design. For the sake of the environmental assessment, the key thing here is that in all three cases, the goal was to get to competitive electric markets.

We have developed a better idea of what it's going to take to get us there over time, and that's the reason we've had three Orders dealing with it instead of one. But the goal has always been fundamentally the same, which is why we've approached our environmental analyses on the other two Orders in the same way.

That leads to the next page, previous environmental analyses. In effect, we have already analyzed

what competitive electric markets would look like in environmental terms, twice; once for Order 888, where we did a full-blown EIS. And there are several folks in the room here who were veterans of various sides of those discussions.

The conclusion from that study was that the effects on emissions and other environmental aspects from competition were relatively minor; that whether they were a net plus or a net minus, had primarily to do with whether the future was good for natural gas or for coal.

And, in effect, if there was lots more natural gas being built in the future, it would be a net positive; if there were lots more coal, it would be a net negative, but in either case, it would be pretty small.

On Order 2000, we had an environmental assessment, and, again, the results were very much the same; the effects are pretty small. The key point in this is that in both cases, what we looked at was what you would expect out of competition, a more efficient set of generation, better use of transmission, and in the 888 study, we also considered the possibility of transmission expansion. If I recall, we ran a version of the thing with transmission expanded by 50 percent, universally. And in all cases, the effects were pretty small.

Next page: Since that time, we believe that

things have, if anything, become more environmentally benign with regard to electric competition. Most of that is because of stuff that is in standard market design that wasn't there earlier.

The first, and in some ways, in my own view, the most important thing, is that this proposed rulemaking recognizes in the clearest possible terms, the importance of demand resources. It requires that they be treated equally in market design and operation, and I think the effect of that will be to reduce peaks, and, in the process, probably help environmental goals of many kinds.

The second thing in it is that there's explicit provision for intermittent resources, which would include demand, but it also includes wind and so forth. And there is a considerable section describing how wind can be treated and so forth.

Again, what that does is allow an environmentally-friendly resource to play on the same terms with everybody else. And we think that that is a big help going forward, or at least a medium-sized help.

Third, as a general matter, standard market design enables, allows, the entry of new supply technologies, and while there's no guarantee that every single new supply technology will be environmentally clean, it is generally the case that they're likely to be more so

than existing technologies.

And, finally, the fact that far more things are being priced in the market as a result of standard market design means that it will be a lot easier to balance new generation, transmission, and demand resources, going forward, so that you won't tend to get too much of one and too little of the other.

Again, while that could work either way in environmental terms, we think that, overall, it's likely to be positive.

What do we propose to do? What we'd like to do is study the effects of things, with and without standard market design; not worry about the absolute levels of things so much as what the change would be as a result of standard market design.

We would like not to reinvent the wheel. We have already, in effect, done the study twice. We're quite confident that doing it on a full scale again would show, because we've had by now, considerable experience with these models and what they are likely to show.

So, ideally, we would like not to do a full study of all electric competition again. What we'd like to do is concentrate on those things that may have changed since the last couple of times we ran the model, new things that we didn't know about then, things that we didn't consider then,

or whatever.

So, what do we need from you in this session and in comments and so forth? First of all, we need your thoughts. That's the reason for having this, and I can certainly speak personally, but I think also for the whole Commission, that we really do want to know what it is that you're worried about, and what you think we need to do.

And, especially, we'd like to know if the basic strategy of trying to work the changes from before, rather than reinventing the wheel is right, and if that's true, then what are the big changes that we need to worry about?

One of them, for example, which is basically benign since the 888 days, is the establishment of a Nox cap, which should take care of a bunch of problems that existed before, potentially.

So that, concludes my introduction here. And are there any questions or comments before we go to the speakers?

(No response.)

MR. WHITMORE: No? Okay.

Let me do this roughly in the order received.

Beth Nagusky, I think you were first, and you, I believe, represent the Independent Energy Producers of Maine; is that right?

MS. NAGUSKY: I represent -- should I go to a

microphone?

MR. WHITMORE: Yes. I do represent the Independent Energy Producers of Maine, and also the New England Renewable Power Producers Association.

They are both associations of renewable power producers. NERPPA, the New England group, is an association of New England state renewable power producer associations. We represent approximately 1500 megawatts of hydro, biomass, and proposed wind generation in the New England region.

And let me start by saying that the economic situation facing renewable power producers in New England is not particularly rosy. In Maine, five of our ten biomass plants have shut down; in New Hampshire, three of their nine biomass plants have shut down.

Many small hydros have shut down, as their PURPA contracts have expired, so, you know, we are hopeful that changes will be made so that we'll reverse this picture, because we believe that, fundamentally, we should not be closing renewable power plants and running our coal and oil plants more frequently, from an environmental as well as other perspective.

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First of all, let me start by saying that NERPPA recognizes the many pluses of the proposed Standard Market Design. And you listed many of them and I don't need to repeat those. But we do recognize that.

However, the worry that we have is the worry with what location marginal pricing means for renewables. We think that it will have a negative impact on the viability of our existing renewable resources as well as new renewable resources. And I will go into the reason that we're worried.

I do want to say up from that we support location marginal pricing as an economic efficiency tool. We think it produces many good results in terms of demand-side management, distributed generation, all of which we support. But we can't get away from the fact that renewables face a unique situation, and we think that they're going to likely be negatively affected with implementation of LMP.

At the end I want to propose some tentative solutions that we think could be used to try and address these negative impacts. But first of all, let me point out that we pointed out this issue in a filing we made about a little over a year ago in the New England Standard Market Design docket, and we included testimony from Janet Besser and Paul Hibbard of Lexicon, which I can submit when I submit when I submit my written comments.

But the basic points that we made there are that renewable power is unique. Renewable power cannot respond to locational price signals. You are not going to locate a hydro unit in downtown Boston because we're not going to be building hydro dams on the Charles River. It's not feasible. We're not going to locate wind generators in load pockets, and we're not going to be able to locate biomass generators in load pockets.

So unlike fossil units get new gas combined cycle which can locate near transmission, near pipelines and be in load pockets, or even nuclear power plants or coal or oil, renewable has got to go where its fuel resource is. And in New England and in most of the country, that's where the rivers are, the free-flowing rivers are, on top of ridge lines or offshore or for biomass plants in the woods. So it's the three W's, you know, wood, water and wind. And these areas do not tend to be in load pockets.

So the best sites for renewable power generally are on the wrong side of constrained interfaces and farther from load in places where the nodal price of power is going to be lower. And this is going to put generically renewable power at a competitive disadvantage.

So what we believe this is going to do and what we are worried about is that the result will be that some renewables will be bottled up on the lower price side of the

constrained interfaces and will receive the lower nodal prices. They will be backed down when transmission is constrained. And because of the decreased revenues that renewables receive relative to fossil and nuclear, this competitive disadvantage is going to impact the level of investment in new renewable resources.

So we believe that generally, and I'm speaking generally, because there are probably always exceptions to this rule, that because, one, renewable cannot choose location based on transmission constraints, they are constrained by things other than price signals; two, because they're generally located not in load pockets but where the nodal price for power will be lower, that this will all negatively affect the operation of existing and investment in new renewables. And this is going to have an environmental impact. Because when we're backed down, this means a coal plant or a gas plant or an oil plant is operating instead.

So that's our concern. In addition to the environmental impact, I just want to point out that it's also going to have an impact on fuel diversity and grid reliability concerns as well, which I know that the Commission has expressed a policy of furthering those things.

It'll also have an impact on air pollution, is

obvious. The lesser you operate a zero emission hydro or wind unit and the more you operate a coal or oil unit obviously is going to have an air pollution impact as well as toxics, mercury and greenhouse gas emissions.

So that in a nutshell, that's our worry. So while we recognized that LMP is a good tool, renewables are in a unique situation, and they cannot respond to this price signal.

We have a few things to throw out as you're thinking about, okay, so how do we address this? Because we're trying to be constructive as well. One of the things that has recently happened in New England is we have implemented a generator information system that allows the unbundling of energy from its attributes, attributes being fuel type, whether it's renewable or nonrenewable, its air emission profile, et cetera, et cetera. Its megawatt size, et cetera.

The reason that we put GIS in place in New England was to allow the regulators to track and verify compliance with state renewable portfolio standards in Maine, Massachusetts and Connecticut, and uniform disclosure laws in those states and then emission performance standards.

So we have -- and this has just started. I mean, it's just started in July where generators have actually

registered their attributes and soon will be able to sell their attributes separate from their energy.

So to the extent that there is a market for green power in New England, it's going to increase the revenues that these generators would otherwise get. What we have proposed to the FERC and what our governor and our state public utilities commission has also advocated is that the GIS, a similar GIS system, be implemented nationwide, so that renewable generators can be able to sell their attributes to markets outside of the area in which they are currently located.

This would hopefully increase the value of the renewable generation and help to offset some of the negative impacts of location marginal pricing. So that's number one. And we would hope that this GIS would be made part of a Standard Market Design nationwide.

We are also working in state and at the federal level to try and get new and better renewable portfolio standards. We're not asking FERC to help us in this necessarily. This is obviously a state battle. It's a battle that we're waging in Congress. But clearly to the extent we can increase demand for renewables through RPSes as well as green markets, then this would also help overcome some of the negatives of location marginal pricing.

Finally, we recognize, and this is where we do

think the FERC could help address the negative impact that LMP might have on renewables. RPSes are not going to be adopted overnight. The federal RPS is in a state of flux. We're not sure what's going to come out of Congress in the energy bill. And GISes are not going to happen overnight.

So in the interim, until we do get in place a workable market that allows renewables to sell their attributes nationwide, it's a liquid market, we are asking and we have asked in prior filings that what you're now calling CRRs, that some CRRs are allocated to renewables so that the price differential between let's say Maine and Boston is alleviated by the allocation of CRRs, so we don't have a situation of backing down a renewable unit and running a dirtier unit just because of transmission constraints.

That's the end of my presentation. I will be submitting written comments by the deadline.

MR. WHITMORE: Great. Thank you very, very much. I'd like to recognize Alison Silverstein from the Chairman's office who's just come into the room.

I think our next presenter is Terry Black, Project for Sustainable FERC Energy Policy.

MR. BLACK: I have a brief statement and then I want just to say a word or two regarding some of the environmental benefits that you noted that you hoped

Standard Market Design will help to convey.

My name again is Terry Black. I'm director of the Project for Sustainable FERC Energy Policy, and I represent a consortium of national, regional, state environmental and consumer public interest organizations that are primarily focused on advocating for sustainable energy policies as the electric industry is restructured and the primary focus of the project is the Federal Energy Regulatory Commission.

The project participated, as was suggested earlier, in both the Order 888 EIS development discussions as well as the Order 2000 EA. With regard to the scope of an EA for the proposed SMD rule, we have three basic suggestions to make up front, and then we'll try to supplement and detail some of those in the comments we file.

Basically, we recommend that FERC Staff first adopt the recommendations of a review that was completed late last year for the North American Commission for Environmental Cooperation, a couple of which I'll note in a second.

Second, that you focus on the emissions potential of additional coal generation, both from the existing fleet and from new facilities likely to result from increased inter and intra regional trading, as well as from additional load growth under the Standard Market Design.

And finally, that you focus on the potential mitigation benefits of regional investments in energy efficiency and renewable energy technologies.

On the first basic recommendation, the reference to the retrospective that was done last October, in a report to the North American Commission for Environmental Cooperation, which was entitled "A Retrospective Review of FERC's Environmental Impact Statement on Open Transmission Access", Synapse Energy economic staff provided a comparison of the Commission's 1996 EIS methods and its findings on likely air emissions with the actual experience that we've had up through year 2000.

In general, the EIS projections for NO_x and CO₂ emissions in year 2000 were significantly lower in both the base cases and the competition scenarios than in the actual experience we've had over that time.

The most important factor in accounting for this gap, according to the report, was the growth in generation. FERC's projection for generation in 2000 was 4.6 percent lower than the actual generation figure.

Among the lessons to be taken from the 1996 analysis to guide future impact assessments, according to the report, are these three:

It will be important for the Commission to assess the potential for increased competition to result in

increased electricity sales, which will of course lead to increased air emissions.

It will also be important for FERC to account for increased load growth related to reduced utility demand-side management efforts, which also of course leads to additional emissions.

And finally, FERC must assess the potential for nuclear capacity factors to improve with increased competition as well as -- I mean as utilities continue to sell their generating units and place them in the hands of a few companies that in effect have greater experience in running nuclear facilities.

Our experience under open access demonstrates that these factors must be considered in future assessments to properly assess competitive energy markets.

In addition, although it didn't have an impact for year 2000 results, the 1996 EIS underestimated coal plant lifetimes. Plant life extensions for coal and other plants are likely to be an important result of competition in the future. And that of course has the potential for having significant impact on emissions over time. The EA we believe then must do an assessment of these impacts.

In sum, based on the Synapse report which may be found on Synapse's Web site, and I can submit a copy if you don't already have a copy of that report. You probably do.

MR. WHITMORE: We have a copy.

MR. BLACK: Based on that report, we recommend that the EA assess the potential under SMD for competition to increase demand and the extent to which increased demand will lead to increased air emissions. This assessment should include the effects that competition may have on utility DSM programs and their impact on demand of course, and it should also assess the emissions impacts of plant life extensions, certainly coal and nuclear, which would have countervailing effects on air emissions of course.

The second area of focus for the EA from our perspective should be the development of a credible estimate of the remaining unused plant capacity in the existing coal fleet, the potential additional generation that may be gained from these plants through efficiency improvements, capacity factor increases, life extensions and other actions provoked by increased competition.

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In addition, the Commission should assess the potential for increased competition to incent the building of new coal plants, and look at the potential area missions impact from that.

The final focus, I think, that we've discussed so far that should be considered by FERC Staff is based on the cost-benefit study done by ICF very recently on the RTO formation process and some of the implications from that. ICF analyses showed the potential for a very large economic gain, economic savings from a relatively small response by the demand side in electricity markets.

Project groups believe that such a dramatically positive impact is also possible for the environment for more reliance on demand side and renewable technologies. In fact, we're convinced that most, if not all of the environmental impacts, the adverse environmental impacts of increased competition could be offset with regional investments, energy efficiency, demand management and renewable resource technologies. Thus we believe FERC's EA should assess the potential for such mitigation and consider additions to the standard market design that could facilitate reasonable levels of investment in these technologies.

That concludes the statement. I wanted to say just two quick words about your -- I don't know what page

number it is -- but the standard market design helps the environment page in your handout. You note the potential value of demand side resources and the potential value of better cost recognition. And I think the concern that is shared by the groups with which I work and certainly my own concern is that doing what the standard market design has proposed to do is essential. It's a first very major and important step. But it's insufficient.

Demand side resources and the underlying infrastructure and the firms that provide the resources for implementing it to the degree that is necessary to provide positive economic as well as environmental effects, those are quite limited, and without what I would characterize in a non-pejorative way as affirmative action by the Commission on the demand side and renewable resources, which you've done to some degree.

The adoption of the California ISO net imbalance proposal is a good example of that. Without further affirmative action, requirements on the part of RTOs and the implementors, the independent transmission providers that implement the standard market design, I'm fearful that the positive economic and environmental benefits of those kinds of investments will not be recognized, not be experienced. And so I think the assessment ought to look at affirmative action options, and we're going to try to identify some of

those for you in our comments. Thanks.

MR. WHITMORE: Thank you very much.

Our third presenter is James Loewen of the California PUC. Welcome.

MR. LOEWEN: Thank you. And the views I'm going to present today are those of energy division of the CPUC. I'm not representing per se the Commission at this point.

The context for my remarks is the way in which the SMD, the NOPR presents a very, very strong push toward markets both in system dispatch and operation, as well as in system expansion and planning. And the basic point that I'd like to present today is that the switch toward a market framework for system operation as well as for system expansion represents a significant impact on land usage which, to my knowledge, has not been carefully or significantly addressed in the previous environmental studies. And I'm talking about the land usage associated with the transmission grid expansion.

The main three reasons why, the main three ways in which we see a push toward markets as causing increased transmission grid expansion are, first basically by promoting new system usages, long distance trade. The second way in which it does this is in order to combat market power, transmission capacity additions are needed. The third point is that in order to accommodate uncertainty

regarding generation plan additions, a certain amount of transmission grid over build would be required apparently.

And okay, moving on to -- addressing these one by one, the first point regards these new usages. I'd like to read from a report published by the North American Electric Liability Council, October 16, 2001, entitled "Reliability Assessment 2001-2010." On page 25, they state:

"As industry restructuring promotes the movement of bulk power over long distances, loading will continue to rise on existing transmission systems. The transmission systems were designed by individual utilities to move energy from local generation to serve native load; they were not designed for open access and interconnection by hundreds of market participants. Industry restructuring significantly altered the nature of transmission service and the volume of such service being requested. The industry is seeing an increase in the uncoordinated simultaneous usage of common transmission facilities such as multiple entities scheduling over the same transmission path. Evidence of such behavior can be seen in the increasing number of problems encountered by those dealing with the impacts of heavy north to south flows within the eastern interconnection and the associated thermal and voltage limitations they caused during the summer of 2000."

So there's an example cited by the NERC of the

effect.

Moving to the second cause, that is mitigation of market power, I would point out that FERC in its NOPR itself acknowledges that the necessity of or the existence of transmission capacity upgrades has one of the tools in FERC's tool kit to mitigate market power, and this is mentioned in several places in the NOPR.

I'll just read briefly from paragraph 14 on page 9. "However, because market power mitigation may tend to suppress scarcity prices that signal the need for investment, a companion mechanism besides spot prices is needed. The Commission proposes a resource adequacy requirement to ensure adequate electric generating transmission and demand response infrastructure, the level of which is to be determined on a regional basis."

There's other places in the NOPR where it's discussed as well.

I'd also like to read an excerpt from comments that were submitted in RMO-112 by two commenters who have experience with electric restructuring in other countries. These comments were submitted by Alex Henney and Tim Russell, and they speak, as I mentioned, from their experience with electric restructuring in the U.K. and other European countries, as well as in other countries around the world. Reading from page four in their comments:

"It is important to appreciate that generally a stronger grid is needed to operate a successful wholesale market than is required by centralized command and control cost-based system. In a cost-based system, the costs can be minimized and there's no potential for the exercise of market power. In a market, generators can not only exercise market power in export constrained areas, it is often possible for portfolio generators to create artificial constraints, and then to exploit them. Thus, both to reduce the scope for the exercise of market power and to build the scope of the workable market, it is necessary to, quote 'overbuild' transmission compared with a cost-based system."

I'd like to along this point also just mention briefly an experience that I had. I work with the planning working group associated with the Seams Steering Group, Western Interconnection. The acronym is SSGWI, and this is a group sponsored under the auspices of the three would-be western RTOs to deal with seams issues.

And we are planning to use two different modeling tools in looking at potential grid expansions in the west. One of those tools is an old-fashioned model based on least cost dispatch. The other tool is a state of the art tool which is still in its trial, just being used for the first time, being used to attempt to simulate market behavior by using a gain theoretic approach.

And it's the full execution of this planning group that the model which uses least cost dispatch will -- well let me phrase it differently. That the model using a market model simulates market behavior will yield grid requirements significantly higher than the model which is based on least cost dispatch. And in fact, the California ISO representative in this working group has mentioned that in studies that the ISO has done on particular traffic corridors, in that that's exactly the results they get, that there's a greater grid requirement for a market based model than there is for a least cost dispatch model.

Moving on to my third point. In order to accommodate uncertainty regarding location of generation, under an IRP format, you pretty much know where generation is going to be and you know where transmission is going to be and you plan the two accordingly together. Under a market model, you don't know exactly where generation is going to be and it stands to reason that in order to make sure that that generation will have an ability to serve customers that it needs to, again it stands to reason that you would need to build in a certain amount of extra capacity to accommodate the uncertainty.

Finally I'd just like to close by saying that because of the capacity over-build that will certainly be entailed as result the great expansion and encouragement of

market framework, the land use impacts of these certain do need to be covered. These can be impacts on communities, impacts on other economic uses, impacts on wildlife, for example. Thank you.

MR. WHITMORE: Great. Thank you very much.

At this point, we have finished with all the people who prescheduled to speak. Are there any others who would like to come up and make comments?

(No response.)

MR. WHITMORE: Are there any comments from the front bench here?

(No response.)

MR. WHITMORE: I don't think so. Okay. Well, thank you very much for coming and we will look forward to the written comments and go forward from there. And especially the three who got up and spoke, thank you very much for coming.

(Whereupon at 2:50 p.m., the SMD Scoping Session was adjourned.)