



Metropolitan Cases

Eastern Municipal Water District v. Metropolitan (Riverside County Superior Court)

A Metropolitan employee filed a complaint against Eastern Municipal Water District (Eastern) on March 5, 2020, seeking damages for alleged work-related injuries from an incident during the Colorado River Aqueduct Shutdown.

The incident involved an unplanned flow of water from a member agency's facility into Metropolitan's Perris Valley Siphon while Metropolitan employees were working inside the siphon. Metropolitan, as the employer, is currently paying workers' compensation benefits. The complaint against

Eastern includes general damages beyond workers' compensation. Eastern filed a cross-complaint against Metropolitan on August 6, 2020, seeking reimbursement for these damages. The cross-complaint contains three causes of action for: (1) Equitable Indemnity; (2) Equitable Contribution and Apportionment; and (3) Declaratory Relief. On November 9, Metropolitan filed a demurrer on the grounds that Labor Code Section 3864 bars actions for indemnity against the employer absent a written agreement executed prior to the injury to reimburse or hold a third-party (in this case Eastern) harmless. The hearing on Metropolitan's demurrer is January 20, 2021.

Matters Impacting Metropolitan

State Water Resources Control Board Seeks Public Input on Cost Estimates for Potential Hexavalent Chromium MCLs

On December 8 and 9, 2020, the State Water Resources Control Board (State Board) held two public workshops to receive public input regarding cost estimates associated with a range of potential hexavalent chromium maximum contaminant levels (MCLs) and treatment technologies. The potential MCLs range between 1 part per billion (ppb) and 30 ppb. The deadline to submit written comments was by noon on December 31, 2020. The State Board is expected to propose hexavalent chromium MCL regulations in early 2021.

California law requires the State Board to set an MCL as close to the public health goal (PHG) as is technologically and economically feasible. The PHG is the concentration of a constituent in drinking water that does not pose a significant risk to health. In 2011, the Office of Environmental Health Hazard Assessment (OEHHA) established a PHG for hexavalent chromium of 0.02 ppb. In 2014, California set an MCL for hexavalent chromium of 10 ppb. However, in 2017, the Sacramento County Superior Court invalidated that MCL, finding that the State Board failed to consider whether any of its cost estimates for complying with the MCL of 10 ppb were economically feasible.

As part of the development of a new MCL, the State Board prepared preliminary estimates of the following: (1) the number of public water system sources that would be impacted at various potential MCL values; (2) information on the costs of various treatment technologies to lower the levels of hexavalent chromium in the water delivered to the public; and (3) information on the anticipated overall costs for public water systems impacted by various potential MCL values. The occurrence and cost estimate data, as well as information on the public workshops, are available at

https://www.waterboards.ca.gov/drinking_water/cer/tlic/drinkingwater/Regulations.html.

Metropolitan staff will continue to monitor the development of a new California MCL for hexavalent chromium.

EPA Issues Draft Guidance Regarding Discharges Through Groundwater to Navigable Waters

On December 10, 2020, the United States Environmental Protection Agency (EPA) published in the *Federal Register* a draft Guidance Memorandum (Draft Guidance) on applying the United States Supreme Court's recent decision in *County of Maui v. Hawaii Wildlife Fund*, 140 S. Ct. 1462 (2020) ("*Maui*"), in the Clean Water Act (CWA) Section 402 National Pollutant Discharge



Elimination System (NPDES) permit program. Comments on EPA’s Draft Guidance must be received on or before January 11, 2021.

As previously reported, in its *Maui* decision, the Supreme Court held that an NPDES permit would be required for a discharge from a point source that reaches jurisdictional waters through groundwater if the discharge is the “functional equivalent” of a direct discharge from a point source into navigable waters and set forth seven factors that help determine “functional equivalency.” EPA’s Draft Guidance proposes an additional factor for the regulated community and

permitting authorities to consider in the “functional equivalency” analysis: “the design and performance of the system or facility from which the pollutant is released.”

EPA’s Draft Guidance also states that before the functional equivalency test is applied, (1) there must be an actual discharge of a pollutant to Waters of the United States (as defined by the CWA), and (2) the discharge must be from a point source.

Metropolitan staff is evaluating the Draft Guidance memorandum and potential impacts it might have on Metropolitan.

Matters Received by the Legal Department

<u>Category</u>	<u>Received</u>	<u>Description</u>	
Action in which MWD is a party	1	Complaint filed in Los Angeles County Superior Court, in the case <i>Imperial Irrigation District (IID) v. MWD</i> , Case No. 20STCV46404, in which IID alleges MWD breached the California Intentionally Created Surplus Agreement, including the implied covenant of good faith and fair dealing, and that MWD converted IID’s water. IID seeks a constructive trust over 87,594 acre-feet of water in Lake Mead or MWD’s system and a judgment against MWD for \$20,896,640.	
Government Code Claims	1	Claim by contractor Stronghold Engineering for costs relating to delays and release of monies withheld for the Mills Electrical Upgrades - Stage 1A	
Requests Pursuant to the Public Records Act	20	<u>Requestor</u>	<u>Documents Requested</u>
		Elite Property Research	Records on balances due on utilities bills for Ventura residents
		Geoscience Support Services	Data on Colorado River water diverted to the Whitewater River
		K&B Engineering	As-built plans of MWD facilities near project in San Diego
		Kleinfelder	Request for Qualifications for As-Needed Environmental Site Assessments
		LeaseQuery	Records relating to accounting standard GASB 96 and subscription-based information technology arrangements (SBITA) contracts
		Los Angeles Times (2 requests)	Records relating to sexual misconduct/harassment claims
Loyola Marymount University Student	Data on number of rebates for cisterns/rain barrels in South Los Angeles and Westchester		



<u>Requestor</u>	<u>Documents Requested</u>
Private Citizen (2 requests)	(1) Records relating to MWD easement on side of residential property in Temecula; and (2) total spent on legal online service and outside counsel for the period 2018-2020, number of in-house attorneys
Rothner, Segall & Greenstone	MWD policies regarding employment probationary period and termination
Santa Margarita Water District	List of attendees who participated in the public call-in sessions and web address for the survey pertaining to MWD's General Manager recruitment
Satwic Inc.	Winning proposals for on-call consulting services for Microsoft Azure Application and IBM Maximo Support Services
Stetson Engineers	GIS data relating to MWD's imported water pipelines
Stream Kim Hicks Wrage & Alfaro	Documents relating to the UPC-12 switchgear for the Mills Electrical Upgrades - Stage 1A Project
TeamDynamix	Winning proposal and contract for ITSM Tool - Service Desk Application
Tetra Tech	List of MWD's local resources program projects
Western Policy Research	Data regarding rebates issued between 2013 and 2019 for toilets, clothes washers, smart controllers, turf replacement, rain barrels, sprinkler nozzles, soil moisture sensors

Other Matters 1 Wage garnishment



PLEASE NOTE

- ADDITIONS ONLY IN THE FOLLOWING TABLES WILL BE SHOWN IN RED.
- ANY CHANGE IN CONTRACT AMOUNTS WILL BE SHOWN IN REDLINE FORM (I.E., ADDITIONS, REVISIONS, DELETIONS).



Bay-Delta and SWP Litigation	
Subject	Status
<p>DCP Revenue Bond Validation Action <i>DWR v. All Persons Interested</i> Sacramento County Superior Ct. (Judge Wood)</p>	<ul style="list-style-type: none"> • Filed Aug. 6, 2020 • Answers or cross-complaints were due October 30, 2020 • Metropolitan, Mojave Water Agency, Coachella Valley Water District, and Santa Clarita Valley Water Agency have filed answers in support • Kern County Water Agency, Tulare Lake Basin Water Storage District, Oak Flat Water District, County of Kings, Kern Member Units & Dudley Ridge Water District, and City of Yuba City filed answers in opposition • North Coast Rivers Alliance et al., Howard Jarvis Taxpayers Association, Sierra Club et al., County of Sacramento & Sacramento County Water Agency, CWIN et al., Clarksburg Fire Protection District, Delta Legacy Communities, Inc, and South Delta Water Agency & Central Delta Water Agency have filed answers in opposition • <u>DWR is seeking a stipulation to consolidate the validation action with the CEQA case for purposes of trial because several answering parties have raised CEQA as an affirmative defense</u>
<p>DCP Revenue Bond CEQA Case <i>Sierra Club, et al. v. California Department of Water Resources</i> Sacramento County Superior Ct. (Judge Earl)</p>	<ul style="list-style-type: none"> • Sierra Club, Center for Biological Diversity, Planning and Conservation League, Restore the Delta, and Friends of Stone Lakes National Wildlife Refuge filed a stand-alone CEQA lawsuit challenging DWR’s adoption of the bond resolutions • Alleges DWR violated CEQA by adopting bond resolutions before certifying a Final EIR for the Delta Conveyance Project • <u>DWR is seeking a stipulation to consolidate the validation action with the CEQA case for purposes of trial</u>



Subject	Status
<p>SWP-CVP 2019 BiOp Cases</p> <p><i>Pacific Coast Fed'n of Fishermen's Ass'ns, et al. v. Ross, et al. (PCFFA)</i></p> <p><i>Calif. Natural Resources Agency, et al. v. Ross, et al. (CNRA)</i></p> <p>Federal District Court, Eastern Dist. of California, Fresno Division (Judge Drozd)</p>	<ul style="list-style-type: none"> • SWC intervened in both <i>PCFFA</i> and <i>CNRA</i> cases • Briefing on federal defendants' motion to dismiss CNRA's California ESA claim is complete; no hearing date set and may be decided on the papers • Federal defendants circulated administrative records for each of the BiOps • <u>December 18, 2020 PCFFA et al. and CNRA et al. filed motions to complete the administrative records or to consider extra-record evidence in the alternative with a hearing date of March 2, 2021</u>
<p>CESA Incidental Take Permit Cases</p> <p><u>Coordinated Case Name CDWR Water Operations Cases, JCCP 5117 (Coordination Trial Judge Gevercer)</u></p> <p><i>Metropolitan & Mojave Water Agency v. Calif. Dept. of Fish & Wildlife, et al. (CESA/CEQA/Breach of Contract)</i></p> <p><i>State Water Contractors & Kern County Water Agency v. Calif. Dept. of Fish & Wildlife, et al. (CESA/CEQA)</i></p> <p><i>Tehama-Colusa Canal Auth., et al. v. Calif. Dept. of Water Resources (CEQA)</i></p> <p><i>San Bernardino Valley Municipal Water Dist. v. Calif. Dept. of Water Resources, et al. (CEQA/CESA/ Breach of Contract/Takings)</i></p> <p><i>Sierra Club, et al. v. Calif. Dept. of Water Resources (CEQA/Delta Reform Act/Public Trust)</i></p> <p><i>North Coast Rivers Alliance, et al. v. Calif. Dept. of Water Resources (CEQA/Delta Reform Act/Public Trust)</i></p> <p><i>Central Delta Water Agency, et. al. v. Calif. Dept. of Water Resources (CEQA/Delta Reform Act/Public Trust/ Delta Protection Acts/Area of Origin)</i></p> <p><i>San Francisco Baykeeper, et al. v. Calif. Dept. of Water Resources, et al. (CEQA/CESA)</i></p>	<ul style="list-style-type: none"> • All 8 cases ordered coordinated <u>in Sacramento County Superior Court</u> • Stay on discovery issued until coordination trial judge orders otherwise • <u>Deadlines to prepare the administrative records extended to Jan. 21, 2021 in the four cases originally filed in Fresno County Superior Court, including MWD v. CDFW</u> • SWC and Metropolitan have submitted Public Records Act requests seeking administrative record materials and other relevant information



Subject	Status
<p><u>CDWR Environmental Impact Cases Sacramento Superior Ct. Case No. JCCP 4942, 3d DCA Case No. C091771 (20 Coordinated Cases)</u></p> <p>Validation Action <i>DWR v. All Persons Interested</i></p> <p>CEQA 17 cases</p> <p>CESA/Incidental Take Permit 2 cases</p>	<ul style="list-style-type: none"> • Cases dismissed after DWR rescinded project approval, bond resolutions, decertified the EIR, and CDFW rescinded the CESA incidental take permit • January 10, 2020 – Nine motions for attorneys’ fees and costs denied in their entirety • Parties have appealed attorneys’ fees and costs rulings • <u>Reporter’s transcript filed Dec. 23, 2020, Appellants’ opening briefs due Feb. 1, 2021</u>
<p>COA Addendum/ No-Harm Agreement</p> <p><i>North Coast Rivers Alliance v. DWR Sacramento County Superior Ct. (Judge Gevercer)</i></p>	<ul style="list-style-type: none"> • Plaintiffs allege violations of CEQA, Delta Reform Act & public trust doctrine • USBR Statement of Non-Waiver of Sovereign Immunity filed September 2019 • Westlands Water District and North Delta Water Agency granted leave to intervene • Metropolitan & SWC Monitoring • Deadline to prepare administrative record extended to January 22, 2021
<p>Delta Plan Amendments and Program EIR 4 Consolidated Cases Sacramento County Superior Ct. (Judge Earl)</p> <p><i>North Coast Rivers Alliance, et al. v. Delta Stewardship Council (lead case)</i></p> <p><i>Central Delta Water Agency, et al. v. Delta Stewardship Council</i></p> <p><i>Friends of the River, et al. v. Delta Stewardship Council</i></p> <p><i>California Water Impact Network, et al. v. Delta Stewardship Council</i></p>	<ul style="list-style-type: none"> • Cases challenge, among other things, the Delta Plan Updates recommending dual conveyance as the best means to update the SWP Delta conveyance infrastructure to further the coequal goals • Allegations relating to “Delta pool” water rights theory and public trust doctrine raise concerns for SWP and CVP water supplies • Cases consolidated for pre-trial and trial under <i>North Coast Rivers Alliance v. Delta Stewardship Council</i> • SWC granted leave to intervene • Metropolitan supports SWC • Delta Stewardship Council has lodged the administrative record • <u>Answers filed</u> • <u>Parties have stipulated to the three remaining <i>Delta Stewardship Council Cases</i> challenging the 2013 Program EIR under CEQA being heard with the four cases challenging the 2018 amendments and Program EIR</u> • <u>SWC and several individual members, including Metropolitan, SLDMWA and Westlands are intervenor-defendants in the three remaining <i>Delta Stewardship Council Cases</i></u>



Subject	Status
<p>SWP Contract Extension Validation Action Sacramento County Superior Ct. (Judge Culhane)</p> <p><i>DWR v. All Persons Interested in the Matter, etc.</i></p>	<ul style="list-style-type: none"> • DWR seeks a judgment that the Contract Extension amendments to the State Water Contracts are lawful • Metropolitan and 7 other SWCs filed answers in support of validity to become parties • Four answers filed in opposition denying validity on multiple grounds raised in affirmative defenses • Case deemed related to the two CEQA cases below and assigned to Judge Culhane
<p>SWP Contract Extension CEQA Cases Sacramento County Superior Ct. (Judge Culhane)</p> <p><i>North Coast Rivers Alliance, et al. v. DWR</i></p> <p><i>Planning & Conservation League, et al. v. DWR</i></p>	<ul style="list-style-type: none"> • Petitions for writ of mandate alleging CEQA and Delta Reform Act violations filed on January 8 & 10, 2019 • Deemed related to DWR’s Contract Extension Validation Action and assigned to Judge Culhane • Administrative Record completed • DWR filed its answers on Sept. 28, 2020
<p>Delta Conveyance Project <u>Soil Exploration Case</u> <i>Central Delta Water Agency, et al. v. DWR</i> Sacramento County Superior Ct. (Judge Chang)</p>	<ul style="list-style-type: none"> • Filed Aug. 10, 2020 • Plaintiffs Central Delta Water Agency, South Delta Water Agency and Local Agencies of the North Delta • One cause of action alleging that DWR’s adoption of an Initial Study/Mitigated Negative Declaration (IS/MND) for soil explorations needed for the Delta Conveyance Project violates CEQA • <u>Jan. 8, 2021 hearing on DWR’s motion to dismiss</u>
<p>Water Management Tools Contract Amendment <i>California Water Impact Network et al. v. DWR</i> Sacramento County Superior Ct. (Judge <u>Earl</u>)</p> <p><i>North Coast Rivers Alliance, et al. v. DWR</i> Sacramento County Super. Ct. (Judge Earl)</p>	<ul style="list-style-type: none"> • Filed Sept. 28, 2020 • CWIN and Aqualliance allege one cause of action for violation of CEQA • NCRA et al. allege four causes of action for violations of CEQA, the Delta Reform Act, Public Trust Doctrine and seeking declaratory relief • <u>Deadline to prepare the administrative record extended to Jan. 26, 2021 in CWIN v. DWR case and Feb. 1, 2021 in NCRA v. DWR case</u> • <u>CWIN case reassigned to Judge Earl so both cases will be heard together</u>



San Diego County Water Authority v. Metropolitan, et al.

Cases	Date	Status
2010, 2012	Aug. 13-14, 2020	Final judgment and writ issued. Transmitted to the Board on August 17.
	Aug. 28, Sept. 1	SDCWA and Metropolitan filed memoranda of costs.
	Sept. 11	Metropolitan filed notice of appeal of judgment and writ.
	Sept. 14, 16	Metropolitan filed motion to strike SDCWA's costs memorandum, and SDCWA filed motion to strike or tax Metropolitan's costs memorandum.
	Oct. 9	Parties filed cross-motions on prevailing party, if any, as to attorneys' fees.
	Oct. 28	Court of Appeal issued order that the matter will be heard and decided on an expedited basis.
	Oct. 30	Parties filed responses to cross-motions on prevailing party, if any, as to attorneys' fees.
	Nov. 12	Hearing on cross-motion for prevailing parties in 2010-2012. Tentative in SDCWA's favor. No final ruling; matter continued to December 16.
	Nov. 25	Parties filed a joint statement on court's jurisdiction to determine prevailing party after appeal filed.
	Dec. 16	Hearing on prevailing party, if any, as to attorneys' fees (postponed from Nov. 12). <u>No ruling at hearing; court took matter under submission.</u>
	<u>Dec. 29</u>	<u>Parties filed oppositions re motions to strike or tax costs memoranda</u>
	<u>Jan. 5, 2021</u>	<u>Parties filed replies re motions to strike or tax costs memoranda.</u>
	Jan. 12	Hearing on motions to strike or tax costs memoranda.
2014, 2016	Aug. 28, 2020	SDCWA served first amended (2014) and second amended (2016) petitions/complaints.
	Sept. 28	Metropolitan filed demurrers and motions to strike portions of the amended petitions/complaints.



Cases	Date	Status
	Sept. 28-29	Member agencies City of Torrance, Eastern Municipal Water District, Foothill Municipal Water District, Las Virgenes Municipal Water District, Three Valleys Municipal Water District, Municipal Water District of Orange County, West Basin Municipal Water District, and Western Municipal Water District filed joinders to the demurrers and motions to strike.
2014, 2016 (cont.)	Nov. 12	Case Management Conference on 2014, 2016 cases; no substantive action.
	Feb. 10, 2021	Hearing on demurrers and motions to strike.
	March 3	Case Management Conference on 2014, 2016 and 2018 cases.
2017	July 23	Dismissal without prejudice entered.
2018	July 28	Parties filed a stipulation and application to designate the case complex and related to the 2010-2017 cases, and to assign the case to Judge Massullo's court.
	Nov. 13	Court ordered case complex and assigned to Judge Massullo's court.



Outside Counsel Agreements				
Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
Andrade Gonzalez LLP	MWD v DWR, CDFW and CDNR Incidental Take Permit (ITP) CESA/CEQA/Contract Litigation	185894	07/20	\$100,000
Aleshire & Wynder	Oil, Mineral and Gas Leasing	174613	08/18	\$50,000
Atkinson Andelson Loya Ruud & Romo	Employee Relations	59302	04/04	\$1,159,763
	MWD v. Collins	185892	06/20	\$60,000
	MWD Drone and Airspace Issues	193452	08/20	\$50,000
Best, Best & Krieger	Navajo Nation v. U.S. Department of the Interior, et al.	54332	05/03	\$185,000
	Iron Mountain SMARA (Surface Mining and Reclamation Act)	158043	07/17	\$250,000
	Bay-Delta Conservation Plan/Delta Conveyance Project (with SWCs)	170697	08/17	\$500,000
	Environmental Compliance Issues	185888	05/20	\$50,000
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP	FCC and Communications Matters	110227	11/10	\$100,000
Burke, Williams & Sorensen, LLP	Real Property - General	180192	01/19	\$100,000
	CA WaterFix Validation Litigation	180196	12/18	\$100,000
	Labor and Employment Matters	180207	04/19	\$50,000
	General Real Estate Matters	180209	08/19	\$50,000 \$100,000
	Delta Conveyance Project Validation Action	185893	07/20	\$100,000
Law Office of Alexis S.M. Chiu*	Bond Counsel	174595	07/18	N/A
Cislo & Thomas LLP	Intellectual Property	170703	08/17	\$75,000



Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
Curls Bartling P.C.*	Bond Counsel	174596	07/18	N/A
Duane Morris LLP	SWRCB Curtailment Process	138005	09/14	\$615,422
Duncan, Weinberg, Genzer & Pembroke PC	Power Issues	6255	09/95	\$3,175,000
Ellison, Schneider, Harris & Donlan	Colorado River Issues	69374	09/05	\$175,000
	Issues re SWRCB	84457	06/07	\$200,000
Haden Law Office	Real Property Matters re Agricultural Land	180194	01/19	\$50,000
Hanson Bridgett LLP	SDCWA v. MWD	124103	03/12	\$1,100,000
	Finance Advice	158024	12/16	\$100,000
	Deferred Compensation/HR	170706	10/17	\$300,000
	Food and Water Watch v. MWD	174612	09/18	\$200,000
	Tax Issues	180200	04/19	\$50,000
Hawkins Delafield & Wood LLP*	Bond Counsel	174601	07/18	N/A
Horvitz & Levy	SDCWA v. MWD	124100	02/12	\$600,000
	General Appellate Advice	146616	12/15	\$100,000
	Food and Water Watch v. MWD Appeal	185862	09/19	\$60,000
Hunt Ortmann Palfy Nieves Darling & Mah, Inc.	Construction Contracts/COVID-19 Emergency	185883	03/20	\$40,000
Internet Law Center	HR Matter	174603	05/18	\$60,000
Jackson Lewis P.C.	Employment: Department of Labor Office of Contract Compliance (OFCCP)	137992	02/14	\$45,000
Kegel, Tobin & Truce	Workers' Compensation	180206	06/19	\$100,000
Lesnick Prince & Pappas LLP	Topock/PG&E's Bankruptcy	185859	10/19	\$30,000



Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
Liebert Cassidy Whitmore	Labor and Employment	158032	02/17	\$201,444
	EEO Investigations	180193	01/19	\$100,000
	FLSA Audit	180199	02/19	\$50,000
	EEO Investigation	180205	05/19	\$50,000
Manatt, Phelps & Phillips	In Re Tronox Incorporated	103827	08/09	\$540,000
	SDCWA v. MWD rate litigation	146627	06/16	\$2,900,000
Meyers Nave Riback Silver & Wilson	OCWD v. Northrop Corporation	118445	07/11	\$2,300,000
	IID v. MWD	185900	08/20	\$100,000
Morgan, Lewis & Bockius	SDCWA v. MWD	110226	07/10	\$8,750,000
Musick, Peeler & Garrett LLP	Colorado River Aqueduct Electric Cables Repair/Contractor Claims	193461	11/20	\$100,000
Nixon Peabody LLP*	Bond Counsel	174600	07/18	N/A
Olson Remcho LLP	Government Law	131968	07/14	\$200,000
	Ethics Office	170714	01/18	\$350,000
Quinn Emanuel Urquhart & Sullivan	Appellate	174598	04/18	\$100,000
Ryan & Associates	Leasing Issues	43714	06/01	\$100,000
Seyfarth Shaw LLP	HR Litigation	185863	12/19	\$250,000
Stradling Yocca Carlson & Rauth*	Bond Counsel	174599	07/18	N/A
	Financial Disclosure	185880	06/21	N/A
Theodora Oringer PC	OHL USA, Inc. v. MWD	185854	09/19	\$700,000
	Construction Contracts - General Conditions Update	185896	07/20	\$50,000
Thomas Law Group	MWD v. DWR, CDFW, CDNR – Incidental Take Permit (ITP) CESA/CEQA/Contract Litigation	185891	05/20	\$250,000



Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
Thompson Coburn LLP	FERC Representation re Colorado River Aqueduct Electrical Transmission System	122465	12/11	\$100,000
	<u>NERC Energy Reliability Standards</u>	<u>193451</u>	<u>08/21</u>	<u>\$25,000</u>
Van Ness Feldman, LLP	General Litigation	170704	07/18	\$50,000
	Colorado River MSHCP	180191	01/19	\$50,000

*Expenditures paid by Bond Proceeds/Finance