

BEFORE THE  
CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

IN RE THE MATTERS OF:

SWRCB Enforcement Actions  
ENFO1951; ENFO1949

WEST SIDE IRRIGATION  
DISTRICT CEASE AND DESIST  
ORDER HEARING,

and

BYRON-BETHANY IRRIGATION  
DISTRICT ADMINISTRATIVE  
CIVIL LIABILITY HEARING.

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DEPOSITION OF JEFFREY YEAZELL

November 13, 2015

Reported By: KATHRYN DAVIS, CSR No. 3808

WSID CDO/BBID ACL  
WSID0151

kathryndavis & associates  
deposition reporting

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APPEARANCES CONTINUED

Also Present:

NICHOLAS BONSIGNORE, P.E.  
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THOMAS K. BURKE, P.E.  
HSI HYDROLOGIC SYSTEMS

KENNETH R. HENNEMAN  
KENNETH R. HENNEMAN CONSULTING

TULLY & YOUNG  
GREG YOUNG, P.E.

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1 BE IT REMEMBERED, that on Friday, November 13,  
2 2015, commencing at the hour of 9:35 thereof, at the  
3 offices of SOMACH SIMMONS & DUNN, 500 Capitol Mall,  
4 Suite 1000, Sacramento, California, before me, KATHRYN  
5 DAVIS, a Certified Shorthand Reporter in the State of  
6 California, duly authorized to administer oaths and  
7 affirmations, there personally appeared

8 JEFFREY YEAZELL,

9 called as witness herein, who, having been duly sworn,  
10 was thereupon examined and interrogated as hereinafter  
11 set forth.

12 --oOo-

13 (Whereupon, Exhibits 23 - 25  
14 premarked for identification.)

15 EXAMINATION BY MS. SPALETTA

16 Q BY MS. SPALETTA: Good morning, Mr. Yeazell. My  
17 name is Jennifer Spaletta. I'm an attorney representing  
18 the Central Delta Water Agency and South Delta Water  
19 Agency in both the West Side Irrigation District  
20 enforcement proceeding and the BBID enforcement  
21 proceeding.

22 Are you familiar with those proceedings?

23 A I am.

24 Q The purpose of our deposition today is to gather  
25 information that is related to those proceedings, so all

DEPOSITION OF JEFFREY YEAZELL

1 of the parties can learn about some of the foundational  
2 things related to those enforcement proceedings. I'm  
3 going to go through a couple of rules to start out.

4 First of all, before we get started with the  
5 rules, we did mark a couple of exhibits before we  
6 started the deposition. We probably should go ahead and  
7 put those on the record.

8 I marked as Exhibit 23 the Amended Notice of  
9 Deposition of Jeffrey Yeazell and Request For Production  
10 of Documents that was issued by Byron-Bethany Irrigation  
11 District.

12 Do you have that in front of you?

13 A Yes.

14 MS. TEMPLE: Jennifer, do you want to let the  
15 other lawyers make their appearances on the record?

16 MS. SPALETTA: Oh, I'm sorry. Yes, we should.  
17 Let's do that first. We have Mr. Yeazell there and why  
18 don't we just go around the room.

19 MS. TEMPLE: Jennifer Kalnins Temple, Deputy  
20 Attorney General from the Department of Justice.

21 MR. TAURIAINEN: Andrew Tauriainen, Office of  
22 Enforcement, State Water Board.

23 MR. PRAGER: John Prager, State Water Board.

24 MR. BURKE: Tom Burke, Hydrologic Systems.

25 MS. SPALETTA: I'm Jennifer Spaletta.



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1 MR. YOUNG: Greg Young, Tully & Young.

2 MS. ZOLEZZI: Jeanne Zolezzi, counsel for West  
3 Side Irrigation District, Banta-Carbona Irrigation  
4 District and Patterson Irrigation District.

5 MR. VERGARA: Good morning. Mike Vergara,  
6 Somach Simmons & Dunn on behalf of Byron-Bethany  
7 Irrigation District.

8 MS. LEEPER: Good morning. Elizabeth Leeper.  
9 Kronick Moskovitz on behalf of Westlands Water District.

10 MR. BONZIGNORE: Nick Bonzignore with Wagner &  
11 Bonsignore Consulting Civil Engineers, consultant to  
12 West Side Irrigation District and BBID.

13 MS. MORRIS: Stephanie Morris, general counsel,  
14 State Water Contractors.

15 MR. O'LAUGHLIN: Are those just the guys in the  
16 Sacramento Valley? Sorry.

17 All right. Tim O'Laughlin. I represent the San  
18 Joaquin Tributaries Authority.

19 MS. MCGINNIS: Robin McGinnis, counsel for  
20 California Department of Water Resources.

21 MS. SPALETTA: Okay. So turning back to the  
22 exhibits. Our first exhibit that we marked was  
23 Exhibit 23, the Deposition Notice issued by  
24 Byron-Bethany Irrigation District.

25 We marked Exhibit 24, which was the Deposition

DEPOSITION OF JEFFREY YEAZELL

1 Notice issued by Central Delta and South Delta Water  
2 Agencies; and Exhibit 25, which was the Deposition  
3 Notice issued by West Side Irrigation District.

4 And counsel for State Board, do you want to  
5 explain your exhibit?

6 MS. TEMPLE: Marked as Exhibit 26 is the State's  
7 objections to the deposition notices.

8 (Whereupon, Exhibit No. 26 was  
9 marked for identification.)

10 Q BY MS. SPALETTA: So at this time, I would just  
11 like to go over what the rules of the deposition are.  
12 Mr. Yeazell, have you ever had your deposition taken  
13 before?

14 A No.

15 Q Have you ever testified under oath?

16 A No.

17 Q Okay. So we are going to go through the rules  
18 in detail since this is your first time. The purpose of  
19 the deposition is for questions to be asked and  
20 answered. I'll be asking questions. There will be some  
21 other counsel in the room that ask you questions as we  
22 go through the day.

23 Your attorney will have a chance to object to  
24 the questions, and then you will provide an answer to  
25 the questions. The testimony is taken under oath and it

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1 may, in fact, be used at a hearing or a court  
2 proceeding. Do you understand that?

3 A Yes.

4 Q It is very important that you are prepared to  
5 provide complete and accurate testimony today, and that  
6 there is nothing that would prevent you from doing that.

7 Is that okay with you?

8 A Yes.

9 Q Is there anything that would prevent you from  
10 providing complete and accurate testimony today?

11 A Not that I'm aware of.

12 Q Okay. The other thing that is very important is  
13 we have a court reporter here who is recording  
14 everything that we say. And so unlike a normal  
15 conversation where we might be anticipating the end of  
16 each other sentences, we can't do that in a deposition.

17 The conversation has to go a little bit slower,  
18 so that we allow each other to finish our sentences  
19 completely. There is a pause so that your counsel can  
20 lodge an objection that she wants to lodge, and then you  
21 provide an answer. So it is important that we go a  
22 little bit slower and allow the court reporter to get  
23 down everything that we say. Okay?

24 A (Witness nods.)

25 Q I'm noticing that you are nodding your head.

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1 That is the other thing I need to tell you about a  
2 deposition. Because we have to have a written  
3 transcript of what occurs during the deposition, we  
4 cannot have you nodding your head up or down or side to  
5 side. And we cannot have an inaudible response, such as  
6 "uh-huh" because it doesn't come across well in the  
7 deposition. We really can't tell if it is a yes or a  
8 no.

9 So I need to make sure, when I ask you a  
10 question, that you provide an audible response and a yes  
11 or a no, if that is appropriate. Do you understand?

12 A Yes.

13 Q The other thing that is important in a  
14 deposition is I don't want you to speculate or guess in  
15 order to provide me with an answer to the question. If  
16 you don't understand the question, I just want you to  
17 tell me that you don't understand the question and I'll  
18 try to ask a better question.

19 If you don't know the answer or you are unsure  
20 about the answer for some reason, I just want you to  
21 tell me that or explain why you are unsure. If you  
22 don't remember, I want you to tell me that as well and  
23 we'll try to see if there are things that might jog your  
24 memory.

25 Do you understand that?

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1 A Yes.

2 Q Okay. So we are going to start today with  
3 looking at the deposition notices that we just described  
4 as Exhibits 23, 24 and 25. Have you had a chance to  
5 review these notices before?

6 A Yes.

7 Q And when was that?

8 A I don't recall offhand.

9 Q Within the last week?

10 A Could have been. I know I've looked at them  
11 in the past since they were emailed to me by Andrew.

12 Q There is an attachment to the first notice,  
13 Exhibit 23, Attachment A. This are documents to be  
14 produced. Did you go through this list and look for the  
15 documents that were responsive to the request?

16 A Yes.

17 Q And did you provide all the documents that you  
18 knew that were responsive?

19 A As part of the PRA, yes.

20 Q Did you actually organize the documents to be  
21 produced as part of the PRA or did you hand them over to  
22 someone else to do that?

23 A I did not organize them. I did hand -- I  
24 gave the location to Andrew, where they were on our  
25 hard drive.

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1 Q I'm going to ask you the same question for  
2 Exhibits 24 and 25. They ask for a slightly different  
3 set of documents. Did you also review the requests in  
4 Exhibits 24 and 25 and compile the responsive documents?

5 A I provided Andrew Tauriainen the location on  
6 the hard drive where they were.

7 Q At this point, do you feel like you've provided  
8 all of the responsive documents and that there are no  
9 others that you've yet to provide?

10 A At this point, yes.

11 MS. SPALETTA: And Mr. Tauriainen, have we  
12 had produced to us, at this point, all of Mr.  
13 Yeazell's documents that he collected?

14 MR. TAURIAINEN: You've had produced all of the  
15 PRA responsive documents, including those from Mr.  
16 Yeazell.

17 Q BY MS. SPALETTA: My next question is: What did  
18 you do to prepare for your deposition today?

19 A I just reviewed the water availability part  
20 of the PRA documents.

21 Q And how did you get those documents? Were they  
22 documents that you already had available to you or did  
23 you actually review the file that was produced as part  
24 of the PRA?

25 MS. TEMPLE: Objection. Compound question.

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1 Q BY MS. SPALETTA: I didn't give you an  
2 instruction on this, so let's stop there. When your  
3 attorney lodges an objection, she is most often, as she  
4 just did, objecting to the form of my question which  
5 thinks she could have asked it better. A lot of times,  
6 I probably could have.

7 When that happens, you are still required to  
8 answer the question, unless I elect to modify the way  
9 I'm asking it. There are times, though, where she may  
10 object on the ground of the question asking you to  
11 disclose privileged information, and she will actually  
12 instruct you not to answer.

13 Unless she instructs you not to answer, when she  
14 lodges an objection, then we just pause for a moment and  
15 then you can provide an answer. Okay?

16 A Okay.

17 Q So she just objected to the form of the  
18 question, which was probably a compound question, so  
19 I'll reask it.

20 You told me that you reviewed the documents in  
21 preparation for your deposition that related to your  
22 water availability analysis. Were those documents  
23 contained on the water availability file that was  
24 produced as part of the PRA or were they in a different  
25 location?

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1 A They were in a different location but it was,  
2 to my understanding, a copy of what was provided in  
3 the PRA.

4 Q Okay. Was that a location on your computer?

5 A Yes.

6 Q Other than reviewing those documents, did you do  
7 anything else to prepare for your deposition?

8 A No.

9 Q Did you speak to anyone at the State Water  
10 Resources Control Board about the deposition other than  
11 your counsel?

12 A My supervisor.

13 Q And who is your supervisor?

14 A Brian Coats.

15 Q And when did you speak to him about your  
16 deposition?

17 A A few times over the past few weeks.

18 Q Did you speak to Mr. Coats after his deposition  
19 yesterday?

20 A Briefly.

21 Q And what was the content of that conversation?

22 A Just how it went, what to expect and that is  
23 about it.

24 Q Did he tell you anything about the types of  
25 questions that he was asked?



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1 A A couple.

2 Q What did he tell you?

3 A I can't remember here. The types of  
4 questions that were asked had more --

5 MS. TEMPLE: If you don't recall.

6 THE WITNESS: Yeah, I don't recall.

7 Q BY MS. SPALETTA: Okay. We may come back to  
8 that later in your deposition. At this point, I want to  
9 go into your background. Do you have a college  
10 education?

11 A Yes.

12 Q And what is it?

13 A Bachelor of Science.

14 Q From where?

15 A Humboldt State University.

16 Q In what subject?

17 A Environmental Resources Engineering.

18 Q And what year did you obtain your BS?

19 A 1992.

20 Q Do you have any other specialized education?

21 A I'm a civil engineer, registered.

22 Q What state are you registered in?

23 A California.

24 Q Anything else?

25 A No.

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1 Q Have you received any other specialized  
2 training?

3 A Special classes or continuing education  
4 classes in data analysis, statistical analysis.  
5 Those are pretty much the two additional areas that  
6 I focus in.

7 Q Do you have any training in water availability  
8 analysis?

9 A No formal training, other than college.

10 Q What did you do in college that was related to  
11 water availability analysis?

12 A I had a couple classes, a class or two. I  
13 don't recall. That is too long ago.

14 Q Did you do a senior project or a thesis while  
15 you were in college?

16 A Yes.

17 Q What was the subject matter?

18 A Groundwater modeling and transport.

19 Q Was that the senior project?

20 A Yes.

21 Q Have you ever published any of your work?

22 A No.

23 Q Have you ever contributed to something that was  
24 published?

25 A Not that I know of, but you never know about

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1 those college professors.

2 Q What is your experience with hydrology?

3 A Mostly groundwater hydrology with previous  
4 companies, like running a lot of the groundwater  
5 monitoring programs, contaminated transport, some  
6 pump studies -- a lot of statistical analysis with  
7 the groundwater data.

8 Q Any prior experience with surface water  
9 hydrology?

10 A No.

11 Q What was your first job out of college?

12 A I was with a consulting company.

13 Q What was the name of the company?

14 A ELM Environmental.

15 Q And what did you do there?

16 A I was a staff engineer.

17 Q What were your job responsibilities?

18 A Assisting the senior staff with various  
19 engineering projects, groundwater monitoring,  
20 underground storage tank investigations. That was  
21 pretty much the bulk of it.

22 Q How long were you there?

23 A About four years.

24 Q '92 to '96?

25 A '93 to '97.

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1 Q What was your next job?

2 A It was BSK Associates. Another private  
3 consulting company.

4 Q What did you do there?

5 A Staff engineer to project engineer. All  
6 sorts of various projects: underground storage tank  
7 investigations, construction management, stormwater  
8 management and consulting, hazardous waste landfill,  
9 monitoring. Again, those were probably the bulk of  
10 my responsibilities there.

11 Q What years were you there?

12 A '90 -- I'm sorry. 1997 through 2013.

13 Q What was your next job?

14 A With the State Water Board.

15 Q What position?

16 A Water resource control engineer.

17 Q Do you hold that same position today?

18 A Yes.

19 Q And what have your job responsibilities been at  
20 the State Board since starting that position?

21 A Pretty much evaluating supply and demand data  
22 for the recent droughts; also some review of reports  
23 from licensees and permittees to assure compliance  
24 with their licenses and permits. That is about it.

25 Q Who has your supervisor been at the State Board?

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1 A Originally it was Aaron Miller. Currently,  
2 it is Brian Coats.

3 Q And then is there anyone that you supervise?

4 A No.

5 Q Is there anyone that you work with side by side?

6 A No.

7 Q What is your familiarity with the West Side  
8 Irrigation District?

9 MS. TEMPLE: Objection. Vague.

10 THE WITNESS: My familiarity is one water right  
11 in many.

12 Q BY MS. SPALETTA: Have you ever been to the West  
13 Side Irrigation District's service area?

14 A No.

15 Q Have you ever seen its facilities?

16 A No.

17 Q Have you ever taken any field measurements or  
18 performed an investigation related to West Side?

19 A No.

20 Q If I asked you all of those same questions with  
21 respect to Byron-Bethany Irrigation District, would I  
22 get any different answers?

23 A No.

24 Q You explained to me that your work at the State  
25 Board has involved supply and demand evaluation for

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1 drought. When did that start? Which month of which  
2 year?

3 A Sometime in 2014.

4 Q Do you remember what the first thing was that  
5 you did?

6 A No.

7 Q If you had to generally describe for me what you  
8 have done related to supply and demand analysis in 2014  
9 and 2015, would you be able to do that?

10 A Generally, yes.

11 Q Okay. Let's go ahead and have you explain that.

12 A I took the demand, I took the supply, plotted  
13 them on a graph to see which was which, to compare  
14 the two.

15 Q Did you make any decisions about what data to  
16 include in supply?

17 A No.

18 Q Did you make any decisions about what data to  
19 include in demand?

20 A No.

21 Q Did you set up a spreadsheet to perform the  
22 analysis you just described?

23 A Yes.

24 Q What did you call that effort when you set up  
25 the spreadsheet?

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1 A Formally, for me, I named it the Water Rights  
2 Use Data Set -- WRUDS.

3 Q The Water Rights Use Data Set. And WRUDS for  
4 short, which is W-R-U-D-S?

5 A Correct.

6 Q Is that supply only or demand only?

7 A That was demand.

8 Q Were you the only person at the State Board that  
9 worked on the spreadsheet?

10 A I was -- yes.

11 Q You hesitated.

12 A I did show some other people, just for proof  
13 checking, to see if my thoughts were right and just  
14 for, you know, a small peer review, I guess.

15 Q Who were the people that you went to for this  
16 peer review?

17 A I forgot her name. She is no longer with the  
18 Water Board right now. I remember her first name,  
19 Eleanor. I can't remember her last name.

20 MR. VERGARA: Did you say Eleanor?

21 THE WITNESS: Eleanor. If it comes to me, I'll  
22 let you know.

23 Q BY MS. SPALETTA: Anyone else?

24 A No. She was the primary one or the only one,  
25 really.

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1 Q Did Brian Coats review the spreadsheet and give  
2 you feedback?

3 A I don't think necessarily on the exact  
4 spreadsheet. But as far as procedures, yes, on how  
5 I created parts of the spreadsheet.

6 Q Is it fair to say that you and Brian discussed  
7 how you should treat data in this spreadsheet, but Brian  
8 did not actually review the mechanics of the  
9 spreadsheet?

10 A Yeah. I think you could say that. He did,  
11 like I said -- I never received any negative  
12 feedback from him. But any ideas that I had to  
13 accomplish what he requested, I did, you know,  
14 discuss those with him.

15 Q What about John O'Hagan? Did he make any  
16 changes to the spreadsheet?

17 A No.

18 Q Did he review the spreadsheet with you?

19 A No.

20 Q So other than the review you said that you  
21 sought from Eleanor and the discussions you had with  
22 Brian Coats, was there anyone else who did anything with  
23 respect to the spreadsheets that you put together?

24 A No.

25 Q Do you remember anything about the specifics of



DEPOSITION OF JEFFREY YEAZELL

1 what Eleanor did?

2 A No.

3 Q How many times did Eleanor review the  
4 spreadsheet?

5 A A couple. I don't remember an exact number.

6 Q Would that have been in 2014 or 2015?

7 A 2015.

8 Q And then when did she leave?

9 A It has been a couple of months ago. I don't  
10 remember exactly. It has been awhile.

11 Q What type of comments did she provide to you?

12 A Just some excessive water rights that she  
13 knew about that appeared to be over reporting that I  
14 wasn't aware of or weren't easily identifiable in  
15 the spreadsheet without her having the prior  
16 knowledge that she did about that particular water  
17 right.

18 Q Do you remember which water rights they were?

19 A It was some small, less than one acre-foot  
20 water right that reported a very large number that  
21 was corrected.

22 Q And when you made that correction, did you make  
23 some type of a notation in the spreadsheet?

24 A Yes.

25 Q So if we pulled up the spreadsheet today, you

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1 would be able to show me where that is?

2 A Yes.

3 Q Are you a member of the State Board Prosecution  
4 Team in the West Side matter?

5 A Am I?

6 MS. TEMPLE: To the extent that you know.

7 Objection to the extent it calls for communications with  
8 legal counsel.

9 THE WITNESS: I think so. I --

10 Q BY MS. SPALETTA: Are you a member of the  
11 Prosecution Team in the BBID matter?

12 MS. TEMPLE: Same objection.

13 THE WITNESS: And same answer.

14 Q BY MS. SPALETTA: So you think so. Do you know  
15 who the other members of the team are?

16 A I believe that would be -- if I am, then it  
17 is probably Brian Coats and Kathy Mrowka.

18 Q What have you done as a member of the  
19 Prosecution Team?

20 A Showed up here.

21 Q Is there any other work that you've done that  
22 you understand is part of the enforcement action for  
23 West Side Irrigation District?

24 A Not yet.

25 Q And is there any of the work that you've done

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1 that you understand is part of the enforcement action  
2 for BBID?

3 A No.

4 Q You said "not yet." Do you anticipate doing  
5 work for either of those?

6 A I am currently working on a witness statement  
7 that is still under attorney-client privilege and  
8 that will be provided when the testimony is due.

9 Q Is it your intention, with respect to your  
10 testimony at the West Side hearing, to explain the  
11 spreadsheet analysis that you previously did or is it  
12 your intention to actually perform new work?

13 MS. TEMPLE: Objection to the extent this calls  
14 for attorney work product. You'll find out what his  
15 testimony is when you get the witness statement.

16 Q BY MS. SPALETTA: I'm not asking you for  
17 anything that you communicated with your attorney, but  
18 I'm just asking you about the work that you did.

19 A I don't know yet.

20 Q And the same question for the BBID matter.

21 A Also, I don't know yet.

22 Q Are you familiar with the Draft Cease and Desist  
23 Order that was issued to West Side Irrigation District?

24 A Yes, somewhat.

25 Q Have you ever read it?

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1 A Briefly.

2 Q Did you have any part in drafting it?

3 A No.

4 Q And the same question for the BBID draft ACL?

5 A No -- well, yes, the same answers.

6 Q So you read it but you had no part in drafting  
7 it?

8 A Correct.

9 Q You told me that you discussed your spreadsheet  
10 with both Eleanor and Brian Coats.

11 A Yes.

12 Q Have you discussed the spreadsheet with anyone  
13 else at the State Board?

14 A No.

15 Q Have you ever discussed the spreadsheet or the  
16 findings from the spreadsheet with a member of the State  
17 Board, a board member?

18 A Board member, no.

19 Q How about with Tom Howard?

20 A No.

21 Q With John O'Hagan?

22 A Yes.

23 Q What discussions have you had with John O'Hagan?

24 A Primarily with him, it was creating -- more how  
25 he wanted the visual presentation, how to make it look

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1 good to make it understandable to the public.

2 Q Other than the discussions regarding visual  
3 presentation of the graph, did you have any other  
4 discussions with Mr. O'Hagan?

5 A Not that I recall.

6 Q How about with Les Grober?

7 A None.

8 Q And Katherine Mrowka?

9 A Same thing. Also input on presentation of  
10 the finally graph.

11 Q Did you have any discussions with people outside  
12 of the State Water Resources Control Board regarding the  
13 work in this spreadsheet?

14 A Yes.

15 Q Who?

16 A MBK.

17 Q Who at MBK?

18 A Marc Van Camp and Anne -- I'm not very good  
19 with last names.

20 Q That is okay.

21 A It begins with an "L." I'll try to remember.

22 Q When did those discussions occur?

23 A A few times over -- in 2015. I don't recall  
24 exactly when.

25 Q What was the content of those discussions?

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1 A The structure of the database of the  
2 spreadsheet and our analysis process.

3 Q What do you remember about the substance of the  
4 discussions?

5 A Mostly for them to get an understanding of  
6 how everything -- of how it worked and how we used  
7 it.

8 Q Did someone provide the spreadsheet to them to  
9 allow them to provide that input?

10 A It was available on the website.

11 Q So they contacted you after it was available on  
12 the website?

13 A Yes.

14 Q Were they providing comments on the Water Rights  
15 Use database that included the demand numbers or on  
16 something else?

17 A Yes, the demand numbers.

18 Q Did they provide any comments on the supply  
19 numbers?

20 A I don't recall.

21 Q So when you said the spreadsheet was posted on  
22 the website, are you referring to the spreadsheet that  
23 is just the WRUDS demand numbers or are you referring to  
24 the Water Availability analysis spreadsheet that  
25 includes both the supply and demand?

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1 A Both.

2 Q We are going to get into detail about the  
3 spreadsheets a little later on, but I'm going to keep  
4 asking you some general questions.

5 Do you remember any more specifics about the  
6 substance of your conversations with these two  
7 individuals from MBK?

8 A No.

9 Q Did you make all of the changes that they  
10 requested that you make?

11 A I don't recall. Any changes they requested  
12 went through my supervisor. So there may have been,  
13 you know -- I didn't directly do anything that MBK  
14 asked for. Anything that was done was directed  
15 through my supervisor.

16 Q Would there be some written record of what was  
17 requested and what you did?

18 A I don't know.

19 Q When you made a change to the spreadsheet, did  
20 you put a notation in there?

21 A When I thought it was important, yes.

22 Q So is it possible that there are some changes to  
23 the spreadsheet that were made where there is no  
24 notation?

25 A Yes.

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1 Q And would you be able to show those to me when  
2 we pull the spreadsheets out?

3 A I doubt it.

4 Q And do you remember anything about the changes  
5 you made where there was no notation?

6 A I don't think -- either that the demand was  
7 so low it was negligible and it didn't really matter  
8 or it had nothing to do with the demand data.

9 Q What is an example of the change that had  
10 nothing to do with the demand data?

11 A There are a couple of flags in there that I use  
12 for -- well, there are some fields in there I use for  
13 filtering that -- for my use that I can turn on and off.  
14 It is kind of hard to explain without having a  
15 spreadsheet in front of me.

16 Q Okay. We will get to that, then, and we will  
17 pull it up. Do you have an understanding, as you sit  
18 here today, what the purpose was of the spreadsheets  
19 that you created?

20 A Yes.

21 Q What is your understanding?

22 A To have an idea of whether there is enough  
23 water to meet all the demand of all the water right  
24 holders that we looked at.

25 Q And who explained that purpose for you?



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1 A Mr. Coats, my supervisor.

2 Q Anyone else?

3 A Various textbooks.

4 Q Do you have an understanding of the different  
5 types of water that each water right is allowed to  
6 divert?

7 A Yes.

8 Q What is your understanding of the type of water  
9 that a riparian water right is allowed to divert?

10 A That they must be contiguous to their  
11 property. They can't -- they can only use it on  
12 their property. And it can't be stored. It has to  
13 be direct -- directly used.

14 Q And where did that understanding come from?

15 A Textbooks and my supervisor, Brian Coats.

16 Q And do you have an understanding of the type of  
17 water that an appropriative right holder can divert?

18 A Yes.

19 Q What is your understanding?

20 A That it does not necessarily have to be  
21 contiguous to their property, they can store it and  
22 use it on other properties.

23 Q Beyond that, do you have any more understanding  
24 as to what types of water an appropriator can divert?

25 A I'm sure there is more but that is it right

1 now.

2 Q Does your understanding come from the same  
3 sources that you previously described?

4 A Yes.

5 Q Do you understand that your spreadsheet captured  
6 all of the different sources of water that are available  
7 for an appropriator to divert?

8 A Yes.

9 Q What is that understanding based on?

10 A What is provided in the water rights use  
11 data -- or in the eWRIMS are the water rights  
12 database from the Water Board.

13 Q But the eWRIMS database only relates to demand,  
14 correct?

15 A Right.

16 Q So my question is whether your spreadsheet  
17 captured all the different types of water supply.

18 A It captures what I was told to capture by my  
19 supervisors.

20 Q And do you have an understanding, one way or the  
21 other, as to whether the types of water that you put in  
22 the spreadsheet include all of the available types of  
23 supply?

24 MS. TEMPLE: Objection. Vague.

25 THE WITNESS: Can you repeat the question?

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1 Q BY MS. SPALETTA: Sure. You explained to me  
2 your understanding of the types of water that an  
3 appropriator can divert. Do you understand that the  
4 spreadsheet you created includes, in the supply section,  
5 all of the different types of water that an appropriator  
6 can divert?

7 MS. TEMPLE: Objection. Vague and ambiguous.

8 MS. MORRIS: Objection. Calls for a legal  
9 opinion.

10 THE WITNESS: I'm going to repeat my answer to  
11 that. I understand that water in there was -- the  
12 supply provided in that spreadsheet was the supply I was  
13 directed to put in there by my supervisor, Brian Coats.

14 Q BY MS. SPALETTA: Okay. Let's go ahead. We are  
15 going to pull up on the screen the Water Availability  
16 section of the State Water Resources Control Board's  
17 website.

18 And we previously marked yesterday a printout of  
19 the file path that Mr. Coats explained to us. You can  
20 look at that.

21 MS. TEMPLE: It is Coats' Exhibit 5.

22 MS. SPALETTA: Oh, no. It is Coats' Exhibit 12.

23 MR. YOUNG: We are having some technical  
24 difficulties.

25 MS. SPALETTA: We are having technical

1 difficulties. Let's go off the record.

2 (Whereupon, a recess was then taken.)

3 Q BY MS. SPALETTA: Back on the record.

4 Mr. Yeazell, we are back from a quick break and  
5 we are fixing our technical difficulties. But while we  
6 do that, I wanted to have you look at what we've marked  
7 as Exhibit 5 yesterday, which is a printout of the  
8 contents of the Water Availability subfile that was  
9 produced to us as part of the Public Records Act  
10 request.

11 So page 1 shows the four subset files of the  
12 Water Availability file. And then page 2 through 4  
13 shows the contents of the 2015 subfile. I wanted to ask  
14 you a question about the contents of this 2015 subfile.

15 There are additional subfiles that are dated by  
16 the date of the three different curtailment notices that  
17 the State Board issued: April 23rd, May 1st and  
18 June 12th. Do you see that?

19 A Yes.

20 Q And then there are a variety of other subfiles.  
21 And then there are numerous individual PDF and Excel  
22 files that are not grouped as part of those notice  
23 dates.

24 Are you familiar with all of the different files  
25 that are listed here?

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1 A Not all of them.

2 Q Which ones are you familiar with?

3 A It is kind of hard to tell because some of  
4 the names are truncated on the file names; but some  
5 of those do look like supply demand graphs at  
6 various -- for various analyses that we have done  
7 through the course of this process.

8 Q So I want to ask you just some general questions  
9 about how you saved the different Water Availability  
10 analysis spreadsheets as you went over time. Can you  
11 describe that process to me, please?

12 MS. TEMPLE: Objection. Vague and ambiguous.

13 Q BY MS. SPALETTA: Do you understand my question?

14 A Yeah. It is vague and ambiguous.

15 Q Okay. What would make the question clearer for  
16 you?

17 A I don't know.

18 Q Well, let me try to ask it another way. I want  
19 to make sure that you understand the question. We  
20 received a bunch of files. They include spreadsheets  
21 and they have different file names and they have  
22 different dates.

23 What I need to understand from you is what that  
24 means, so that we can look at the right spreadsheet. So  
25 I would like you to describe for me the process that you

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1 went through to save different versions of your  
2 spreadsheet work.

3 A Well --

4 MS. TEMPLE: Objection. Vague and ambiguous.  
5 Go ahead.

6 THE WITNESS: To save you time, a lot of this --  
7 you know, my understanding of the PRA request is that  
8 everything that is on the hard drive needs to go if it  
9 is associated with the request.

10 So a lot of this is just exploratory stuff that  
11 I created over time that just happened to be on the hard  
12 drive that the data requests. So a lot of it isn't  
13 really -- it was more for my use to figure out how to  
14 create or how to ultimately figure out my means to get  
15 to the end to make the spreadsheets.

16 Q BY MS. SPALETTA: Okay.

17 A So that's what the bulk of that file is.

18 Q Do you understand that there was essentially a  
19 complete version of your spreadsheet that was saved at  
20 different dates in time to be used for the curtailment  
21 process?

22 MS. TEMPLE: Objection. Assumes facts not in  
23 evidence.

24 THE WITNESS: There are several versions of the  
25 spreadsheet in the folder, yes.

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1 Q BY MS. SPALETTA: Well, let me ask you a more  
2 specific question. Do you understand that the State  
3 Water Resources Control Board curtailed certain water  
4 rights on April 23rd, 2015?

5 A Yes.

6 Q Do you understand that that curtailment decision  
7 was based on one of the spreadsheets that you created?

8 A Yes.

9 Q Do you know which spreadsheet it was based on?

10 A That would be -- the demands in all of the  
11 spreadsheets are essentially the same, so it could  
12 be from any spreadsheet. Yeah, I don't know.

13 Q Okay. Let me ask a different line of questions.  
14 When you completed a spreadsheet that you believed was  
15 then used for a curtailment, did you post it to the  
16 website?

17 A I did no posting.

18 Q What did you do with the spreadsheet once you'd  
19 completed it?

20 A I provided it to Brian Coats or showed him  
21 where it was on the hard drive.

22 Q Do you know who made the decision regarding what  
23 to post to the website?

24 A No.

25 Q Do you know who made the decision as to when to

1 post spreadsheets to a website?

2 A No.

3 Q Do you know when your spreadsheets were actually  
4 posted to the website?

5 A Specifically on an exact date, no.

6 Q Do you know generally?

7 A No.

8 Q Who would have that information?

9 A Brian Coats.

10 Q Okay. Let's look, then, at the information that  
11 is posted to the State Water Resources Control Board's  
12 spreadsheets. We have pulled up the Water Availability  
13 link on the Drought Information page, which is the way  
14 that Brian Coats told us to get to this information as  
15 depicted on Exhibit 12.

16 Do you agree that this is the right way to go?

17 A I agree that is a way to go.

18 Q What is the other way?

19 A Just typing in --

20 Q Typing?

21 A Just typing in the url. There is more than  
22 one way to get to the same place.

23 Q Okay. So from here, we are going to click on  
24 the link that says Preliminary Supply and Demand  
25 Analysis Graphs for the 2015 Water Year. And now we



1 have a new page that is opened up entitled Watershed  
2 Analysis, and it includes a variety of links to  
3 documents. Are you familiar with this page?

4 A Yes.

5 Q So there is a screen shot of this page that is  
6 page 3 of Exhibit 12. You described for us your WRUDS  
7 database, which includes the demand information that you  
8 used in your spreadsheets. This page has two documents  
9 with the same title. The first is "2015 Informational  
10 Order and Demand Data Set" updated April 8th, 2015. And  
11 the second is "2015 Informational Order Demand Data  
12 Set," dated June 15, 2015.

13 A Okay. Yes.

14 Q Are you familiar with those data sets?

15 A I don't know what the underlying file names  
16 are, so no.

17 Q Let's go ahead and open the first one so you can  
18 look at it, which is the April 8th, 2015 data set.  
19 While it is downloading, I'll ask you a question.

20 One of these data sets is 12.7 megabytes. The  
21 other one is much larger, 41.534 megabytes. It says it  
22 has embedded calculations. Do you know what the  
23 difference is?

24 A That is exactly why. It has the calculations  
25 embedded in it.

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1 Q What does that mean, "embedded calculations"?

2 A That means it has all the spreadsheet  
3 calculations in it.

4 Q Can you give me an example, more specific?

5 A Without going into how you use Microsoft  
6 Excel, probably not.

7 Q You can go into it.

8 A That has all the calculations that I used to  
9 determine various calculations to come up with the  
10 data set.

11 Q Is the raw data the same in both of those data  
12 sets?

13 MS. TEMPLE: Objection. Vague and ambiguous.

14 THE WITNESS: Which raw data?

15 Q BY MS. SPALETTA: You said that you took data  
16 from eWRIMS and you created the WRUDS data set.

17 A The raw data that came from eWRIMS, yes, that  
18 is the same.

19 Q And you also explained various corrections or  
20 modifications that you made to that data. Are those  
21 corrections or modifications going to be the same  
22 between the two?

23 MS. TEMPLE: Objection. Vague and ambiguous.  
24 Assumes facts not in evidence.

25 THE WITNESS: No. Because as time goes by, you

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1 know, the staff is made aware of additional changes that  
2 should be made that we weren't aware of previously.

3 Q BY MS. SPALETTA: Okay. So we have now opened  
4 up the first one, which had a date of April 8th. And as  
5 you can see, then, the file path at the top is  
6 "info\_order\_demand\_nocals-2.xlsx.

7 Are you familiar with this file?

8 A That particular file name, no; but what I see  
9 on the spreadsheet, yes.

10 Q Okay. So we are going to go ahead and go  
11 through the tabs of this spreadsheet. Does this look  
12 like a spreadsheet that you created?

13 A Yes.

14 Q So there are multiple tabs reflecting multiple  
15 sheets in the Excel workbook, correct?

16 A Yes.

17 Q What is the first tab?

18 A The first tab --

19 MS. TEMPLE: So the record is clear, do you want  
20 to read out what the tab is followed so it can be  
21 followed later?

22 Q BY MS. SPALETTA: The first tab is  
23 WRUDS2015-04-06. Did you name this tab?

24 A Yes.

25 Q What is contained in this tab?

1 A That contains all the diverter information,  
2 beneficial uses, their reported demands from eWRIMS  
3 for 2010 to 2013, water rights use types, diversion  
4 uses for 2010 through 2014, and various other  
5 calculation fields to get to the ultimate monthly  
6 demands that we use by each diversion. So basically  
7 what we used as the diversion amounts in our  
8 spreadsheets.

9 Q So there are multiple columns here. We can't  
10 view them all at the same time on the screen. What I  
11 would like to do is we are going to go ahead and scroll  
12 over. I would like you to tell me to stop when we have  
13 gotten to the point where we are done with what you  
14 downloaded from eWRIMS, and we get to the point where  
15 you actually were doing something else that wasn't from  
16 eWRIMS.

17 MS. TEMPLE: Objection. Vague and ambiguous.

18 Q BY MS. SPALETTA: Do you understand the  
19 question?

20 A I do, but those are sort of intermingled.

21 Q Okay. So we are just going to scroll over here.  
22 We have column A, which is the ID for the application or  
23 the statement. We are going to scroll all the way over  
24 to column P, which says "priority date."

25 Where did that information come from?

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1 A That came from eWRIMS.

2 Q Scroll over some more and we get to column U.  
3 It says "projects." What does that mean?

4 A That was just an internal column for me, just  
5 so I had an idea of where -- so I knew what could  
6 easily filter, what were some of the projects --  
7 project water rights -- just a quick filter for my  
8 personal use.

9 Q What were the different projects you were  
10 looking for?

11 A Just the CVP, Central Valley Project, and the  
12 State Water Project.

13 Q What did you do with that filter?

14 A Nothing.

15 Q The next column is B, "use\_pow\_flag." What was  
16 that column for?

17 A That was for my "power only" evaluation. If it  
18 was a "power only" water right, then I identified what  
19 type of diversion it had. POS stands for point or place  
20 of storage. So that tells me that that "power only"  
21 water right stored water. It wasn't necessarily  
22 drought-diverted.

23 Q What did you do with the information in this  
24 column?

25 A That told me how to treat the demand.

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1 Q What were the different options for how you  
2 treated the demand?

3 A If the "power only" water right was direct  
4 diversion only, we assumed that it did not or was  
5 not consumptive use, so the demands were set to zero  
6 for those water rights. So we took that demand out  
7 of the database, essentially.

8 Q What were the other alternatives?

9 A The other one was PO, place of storage, point  
10 of storage. And then the other one was combination  
11 point of storage, point of diversion.

12 Q What did you do with the information, if it was  
13 a POS?

14 A There, we assumed if it was point of storage,  
15 that means they did store water. If it was "power  
16 only," we -- by "we," I mean the staff. We assumed  
17 that the amount -- I'm trying to put this in  
18 layman's terms. The consumptive use or the demand  
19 was the net of the reported diversion minus the  
20 amount used. In other words, so we treated -- that  
21 was the amount that was actually stored.

22 If the reported diversion was less than --  
23 I'm not sure I have this right. So if the reported  
24 diversion amount was greater than the amount  
25 reported used for each month, the difference was

1 considered consumptive use, and that was considered  
2 the demand for the demand analysis.

3 If the amount used was greater than the  
4 amount diverted in a given month, that was  
5 considered no diversion because they were releasing.  
6 They weren't storing water. So we assumed that for  
7 that particular month, the demand was zero.

8 Q So we are looking at just the first 25 rows of  
9 this spreadsheet. There are hundreds of rows, but we  
10 have in row 7 a POS designation. So if we scroll over,  
11 are we going to be able to see the computation that you  
12 just described?

13 A It is embedded in the cell.

14 Q In that cell?

15 A What you are looking at? If this is the  
16 small version, you won't be able to see it but you  
17 can see the result. All right. Click on that cell.  
18 Okay, yeah. This doesn't have the equations in it.  
19 That is why it is smaller.

20 Q So if we open the larger version of this and we  
21 look at cell V 7, we should be able to see the  
22 computation that you just described?

23 A Provided it is in the same cell, yes.

24 Q Going to the next column, it says, "man\_entry."  
25 What was this column for?

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1 A That is a flag to signify that I went in and  
2 added demands manually so it wasn't direct. It was  
3 not a direct download out of eWRIMS. If you look at  
4 the one, two, three, four -- the tab that says  
5 "manual entries."

6 Q Yes.

7 A So whatever values that are in that "manual  
8 entries" gets repopulated if the "manual entries" is  
9 flagged yes. So that usually happens when there is  
10 information that isn't readily available in eWRIMS, that  
11 staff becomes aware of as we are proceeding. So  
12 everything that we do, you know -- yeah.

13 Q And we should be able to open that "manual  
14 entry" tab later on and see all of the manual entries?

15 A Right.

16 Q The next column is X and the label is  
17 "dup\_flag." What was this column for?

18 A That was to search for any potential duplicate  
19 flags or any potential duplicate reporting. If the  
20 basic algorithm in the spreadsheet, it looked for  
21 identical owners. And each average, monthly demand had  
22 to be identical for all 12 months. And if that was the  
23 case, then those two water rights would be flagged as  
24 potential duplicates.

25 Once I had those flagged, I went back into



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1 eWRIMS and reviewed whether they could -- based on the  
2 information available in eWRIMS, if there was any  
3 indication that they could be duplicates. And if they  
4 were, I removed the demand from one of the water  
5 rights -- just to reduce, you know, to reduce that  
6 demand so it is not counted twice.

7 Q Other than the methodology that you just  
8 described, was there any other efforts made to identify  
9 duplicative demand reporting?

10 A In this spreadsheet, no. But there are other  
11 instances where staff was made aware of them, and  
12 that is where the "manual entries" come into play.

13 Q Was there ever any discussion, that you were  
14 aware of, where the topic was how can we identify other  
15 duplicative reporting?

16 MS. TEMPLE: Objection. Vague and ambiguous.

17 THE WITNESS: No.

18 Q BY MS. SPALETTA: Was there any effort to  
19 actually contact the people who have these water rights  
20 to determine whether they had duplicative reporting?

21 MS. TEMPLE: Objection. Vague and ambiguous.

22 THE WITNESS: That would seem like a lot of work  
23 for tens or thousands of water rights, but no.

24 Q BY MS. SPALETTA: Let's go to the next column  
25 and it is Y. It is "dup\_result." What was this column

1 used for?

2 A That indicated the action taken on the  
3 results of the findings of the duplicate analysis.  
4 It would help if you could scroll down to one where  
5 there was actually --

6 Q So I'm looking at column Y. Let's go ahead and  
7 scroll down until we see an entry. We have an entry in  
8 row 93, and the entry is a "Y."

9 A So that indicates that -- I assume that one  
10 was a duplicate.

11 Q And then the next column B, it says "dup\_notes."  
12 What was the purpose of this column?

13 A I explained why I considered it was a  
14 duplicate.

15 Q All right. Where it says "see notes," does that  
16 mean we would have to scroll somewhere else?

17 A Yes, all the way to the end of this  
18 spreadsheet.

19 Q So we will get there. The next column AA is  
20 entitled, "reasonable\_flag." What does that mean?

21 A That was a -- that is where there is a  
22 formula that tests for potential overreporting based  
23 on the information that was available in eWRIMS for  
24 post-14 appropriative water rights. It compared the  
25 face value that was in eWRIMS to the total average

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1 annual demand of the water rights. So it would be  
2 the total demand for the year of the average of the  
3 2010 to 2013 data that we have in there.

4 If the demand was -- so if that demand was  
5 greater than the face value, the average monthly  
6 demand was reduced by that factor, so that the total  
7 annual demand would not exceed the face value for  
8 that water right. So, basically, we reduced demand  
9 so those demands could not exceed the water right.

10 So that was one easy way to, you know,  
11 account for overreporting there and was reducing the  
12 net total demand for the water.

13 Q Was that process used for permits and licenses?

14 MS. TEMPLE: Objection. Vague and ambiguous.

15 THE WITNESS: Post-14 permits and licenses, yes.

16 Q BY MS. SPALETTA: Was that process used for  
17 statements?

18 MS. TEMPLE: Objection. Vague and ambiguous.

19 THE WITNESS: Different processes were used for  
20 statements. That only evaluated -- let me back up to  
21 the post-14 water rights. That only evaluated for  
22 rights that did have a value in the face value field in  
23 eWRIMS.

24 Q BY MS. SPALETTA: Can we scroll down in this  
25 column AA until we get to one, so that we can see what

1 that looks like.

2 So we have a couple here. Row 82 in column --  
3 I'm sorry. Let's stop right here. Row AA in column --  
4 let's start again.

5 Row 10, column AA, there is an entry FV. So  
6 what did you do with this particular water right?

7 A So that told me that the total average demand  
8 for the year exceeded the face value.

9 Q And then in the next column, column AB entitled  
10 "reasonable\_factor," there is an entry of 1.20. What  
11 does that mean?

12 A That the reported demand -- the average  
13 reported demand exceeded the face value by 1.5  
14 times.

15 Q 1.2 or 1.5?

16 A 1.5.

17 Q Are you looking at row 10 or row 17?

18 A I'm sorry. I'm looking at 17.

19 Q So in row 10 --

20 A -- that would be 1.2.

21 Q What does that tell us?

22 A That the average demand, the average annual  
23 demand exceeded the face value by 1.2 times. So it  
24 was 120 percent greater than the face value.

25 Q So then per your prior testimony, you made a

1 reduction to get it to 100 percent?

2 A To get it to one, yes.

3 Q All right. The next row or column, excuse me,  
4 is AC. The title is "DIV\_Factor." What was that column  
5 for?

6 A That instructed the spreadsheet how to deal  
7 with the demand. If you click on -- click on the  
8 little triangle, the filter arrow just below the  
9 factor. Yeah. So you can see at the bottom, there  
10 are three different fields. There is "all," "net"  
11 and "none."

12 The "all" flag indicates that the demand  
13 should be essentially used as is after -- all the  
14 demands should be used. This mostly concerns "power  
15 only" diversions and duplicates. So "all" basically  
16 I don't do any other modifications.

17 With "net," that is for the "power only"  
18 where I describe the -- that includes just the  
19 consumptive part of the "power only" diversions, as  
20 I explained before. And "none," that is for the not  
21 consumptive, direct diversion only power diversions,  
22 or it is a duplicate that I removed from demand.

23 Q Thank you.

24 The next column is column AD and the title is  
25 "factor\_notes." What was the purpose of this column?

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1 A That explains notes on why the particular  
2 diversion factor was used. So I can see row 7 AC  
3 says "net." And the reason being, it is the "power  
4 only" point of storage, so I used the "net" value.

5 Q Now the decisionmaking that you've been  
6 describing so far related to these power rights, was  
7 that a decisionmaking authority that you had or did  
8 someone else tell you to do that?

9 A I was told to do that.

10 Q By who?

11 A Brian Coats.

12 Q All right. Let's go over to the next column.  
13 We are going to look at several columns at the same time  
14 because they look similar. Would you look at column AE  
15 through AM. What do these columns represent?

16 A Those are the reported diversions for  
17 January, February, March, April, May, June, July and  
18 August of 2010 from the eWRIMS database.

19 Q Did you make any modifications to the data in  
20 these columns?

21 A No.

22 Q Let's scroll over some more. We have columns AN  
23 through AP. Is that just the eWRIMS information for the  
24 last three months of 2010?

25 A Yes.

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1 Q Then you have the next set of columns beginning  
2 at AQ and going through BB. Is that the eWRIMS reported  
3 diversion information for 2011?

4 A From June to December, yes.

5 Q I scrolled past ones for the first half of the  
6 year. You have the whole year in there, right?

7 A Yeah. It is all years for 2010 through 2013.

8 Q All right.

9 A If you keep going --

10 Q We'll keep going. Tell us when to stop.

11 A You'll see the color change. Okay. Stop.

12 Q So we stopped at column B 7. Does this complete  
13 the columns that contain the eWRIMS diversion  
14 information for 2010 through 2013?

15 A Yes.

16 Q Did you make any changes to any of those numbers  
17 or do they come straight out of eWRIMS?

18 A No changes. Straight out of eWRIMS.

19 Q Now, which information out of eWRIMS  
20 specifically is populating these cells? Is it the  
21 diversion information or the use information?

22 MS. TEMPLE: Objection. Compound.

23 Q BY MS. SPALETTA: Do you understand the  
24 question?

25 A Yes. What we just went over, that was

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1 diversion.

2 Q Was there any analysis done as part of your  
3 spreadsheet effort to look at the use numbers from  
4 eWRIMS reports?

5 A Only for power diversions, as I already  
6 described.

7 Q So now let's scroll over a little more and look  
8 at the columns beginning with CA. The CA column title  
9 is "Jan\_use\_2010." What does this column include?

10 A That is the reported use from eWRIMS for the  
11 month of January 2010.

12 Q So that is related to the question I just asked  
13 you, right, about whether it was diversion information  
14 or use information?

15 A Correct. So this is the use information.

16 Q So why did you include both of them?

17 A That is the data that was given to me, and  
18 also it came into use for "power only" diversions as  
19 I described before.

20 Q So let's keep scrolling over. It looks like you  
21 have their eWRIMS use data for every month of 2010  
22 through 2013; is that correct?

23 A Yes.

24 Q So that data populates the spreadsheet all the  
25 way through column DV?



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1 A Is that a question?

2 Q Yes.

3 A Oh, yes.

4 Q All right. Let's start looking at the next  
5 column which is DW. The title on column DW is  
6 "avg\_div\_jan." What is in this column?

7 A Those are the average diversions for January  
8 per each water right for the four years in the data  
9 set, so for 2010 to 2013.

10 Q What was the purpose of this column?

11 A To determine what the average diversions were  
12 for that month.

13 Q And how was that information used?

14 A Ultimately, those would be the demands used  
15 in analysis after various -- the adjustments we  
16 already discussed were made.

17 Q Let's scroll over some more. I want to stop at  
18 column EE. What does column EE represent?

19 A That is just the annual total of the  
20 12 months of the diversions.

21 Q That is the average diversion?

22 A No, the annual total of the average  
23 diversion.

24 Q The annual total of the average diversion for  
25 the years 2010 through 2013?

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1 A Yes.

2 Q Then let's move to column EJ. What does column  
3 EJ, which is entitled "ave\_use\_jan" include?

4 A That is the average use for each water right  
5 for the month of January 2010 through 2013.

6 Q And it looks like the next columns continue the  
7 same data all the way through December?

8 A Yes.

9 Q And what was the purpose of the information in  
10 these columns?

11 A Same thing. Those were provided in the data  
12 set download and also used for "power only"  
13 diversion evaluations.

14 Q Other than the "power only" issue, was this  
15 average use data for the other water rights utilized in  
16 the supply and demand analysis?

17 A No.

18 Q Why not?

19 A I don't know.

20 Q The next column we will look at is column EV  
21 which is entitled "demand\_JAN." What does this column  
22 include?

23 A That is the demand used in the Supply/Demand  
24 Analysis spreadsheet.

25 Q And how did each of these cells get populated?

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1 A You have to scroll all the way back to the  
2 beginning of the spreadsheet. Based on all the  
3 different adjustments made from the previous columns  
4 -- once again, it follows through from the equation  
5 that you can't see on this spreadsheet. But if the  
6 power is "all," then it is just -- I'm sorry. It  
7 is -- I can't explain it without going back to the  
8 other columns.

9 Q So you asked us previously to click on the  
10 little arrow button that is in the top of these columns.  
11 What do you call that thing?

12 A The filter.

13 Q The filter. What is the purpose of the filter?

14 A That is just a standard thing that you can  
15 use in Microsoft to filter. It is just like a query  
16 so I can filter out specific water rights based on  
17 -- it is a filter.

18 Q Did you use a filter for these purple columns  
19 that we are looking at starting with column ED?

20 A Of course.

21 Q So let's open the filter for January.

22 MS. TEMPLE: Jennifer, if we could take a break  
23 at the next appropriate moment. Thanks.

24 Q BY MS. SPALETTA: Sure. What was the purpose of  
25 the filter that you have here in column ED?

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1 A It is No purpose. It is just there. If you  
2 have a filter for one column, you have it for all of  
3 them.

4 Q You didn't use it?

5 A I could use it to sort demand filters to see  
6 who is high, who is low.

7 MS. SPALETTA: All right. Let's take a  
8 break.

9 (Whereupon, a recess was then taken.)

10 Q BY MS. SPALETTA: Okay. We just took a quick  
11 break and now we are back. We are looking at the same  
12 spreadsheet which is the "infoorder\_demand\_nocalcs.2"  
13 Excel spreadsheet. We are on the first tab. We are  
14 looking at purple columns and starting with column EV.

15 The first question: There are dashes in some of  
16 these columns. What does the dash mean?

17 A Zero.

18 Q Let's go over and scroll over to the end of the  
19 purple columns. We have a column entitled  
20 "FHdemand\_total." What does this column include?

21 A That is the annual, the total of the  
22 12 months of the demand -- of the 12 previous demand  
23 columns.

24 Q And this is the demand that was actually used  
25 for the supply and demand analysis, correct?

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1 A Yes.

2 Q So using the filters you just described to me,  
3 could we actually sort this demand total column by  
4 magnitude?

5 MS. TEMPLE: Objection. Vague.

6 THE WITNESS: Yes.

7 Q BY MS. SPALETTA: So let's try and do that and  
8 see if we do it right. We'll pull down the filter. How  
9 would we do that?

10 A Just sort "descending."

11 Q That gives us the smaller on top or the biggest  
12 on top?

13 A That puts the biggest on top, except it puts  
14 empty cells on top.

15 Q So then we have to scroll down until we find the  
16 biggest ones?

17 A Or on that window, go down to the bottom  
18 where it says "select all." And then to the right  
19 you see another scroll. Scroll. Pull that all the  
20 way to the bottom. And then uncheck "blanks."

21 Q So we now have this database sorted with the  
22 largest demands on top?

23 A The largest total demand on top, so the  
24 largest annual demands on top.

25 Q Got it. So the column right next to it, which

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1 is column FI entitled "demand\_apr-sep," what does that  
2 column include?

3 A The demands, the total demands from April  
4 through September.

5 Q So the first three applications here have total  
6 demands for April through September of approximately  
7 4 million acre feet; is that correct?

8 A If that is what the numbers say, yes.

9 Q And then the next 10 or 20 or so add up to  
10 another several million acre feet, correct?

11 A If that is what the numbers say. I don't  
12 have a calculator in front of me.

13 Q As part of the QA/QC process, did you or anyone  
14 else that you are aware of contact the owners of these  
15 water rights to verify these numbers?

16 A No. We relied on the demand data in the  
17 eWRIMS to be true and accurate as required to be  
18 reported --

19 Q Okay.

20 A -- by the diverters.

21 Q Have you done any estimates of what a 5 or  
22 10-percent change in these numbers would have on the  
23 supply and demand analysis?

24 A No.

25 MS. TEMPLE: Objection. Compound, vague and

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1     ambiguous.

2             THE WITNESS:   No.

3     Q           BY MS. SPALETTA:   Were you asked to do that?

4     A           No.

5     Q           All right.   Let's unsort, so the data goes back  
6     to the way it was as we were looking at it.   How do we  
7     unsort, Mr. Yeazell?

8     A           I don't know what you did.   What do you mean?

9             MR. VERGARA:   You have to reverse whatever he  
10    did in that column.

11            (Whereupon, discussion held off the record.)

12    Q           BY MS. SPALETTA:   All right.   Let's go back and  
13    scroll over to what we were looking at.   We just  
14    finished talking about column FH and FI, so let's look  
15    at the next column which is column FJ entitled "notes."

16            What is this column?

17    A           Notes.

18    Q           Who put the notes in this column?

19    A           Me.

20    Q           Anyone else?

21    A           No.

22    Q           Let's scroll down and look at an example of your  
23    notes.   So we have an example at row 93 related to  
24    application 1232.   And the note says, "Collections to  
25    storage for irrigation and M & I uses under the

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1 District's licenses are also reported as collection  
2 storage under the District's licenses for power since  
3 they have the same place of storage."

4 What was the purpose for this note?

5 A I don't recall without more context.

6 Q Do these notes explain any modifications that  
7 you made?

8 A Yes.

9 Q Where would the modification appear?

10 A One of the previous columns.

11 Q Which one?

12 A I don't know off the top of my head. You'd  
13 have to scroll.

14 Q Please scroll back. Would it have appeared in  
15 the purple columns?

16 A No.

17 Q In the bright blue?

18 A No.

19 Q In the light lavender?

20 A No.

21 Q Now we are in the --

22 A Okay. So it would have to be in the factor  
23 notes. Move the cell over one more time.

24 Q I'm sorry. I didn't hear.

25 A I'm sorry. There is more information in the



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1 factor notes. So that tells me that it was a "power  
2 only" place of storage, and that I used a net  
3 storage.

4 But the notes indicate that I had to change  
5 -- that I ended up changing that to "none," meaning  
6 the demand was removed for whatever the notes say.  
7 But I don't recall exactly what or how -- what  
8 happened for me to put that note in there.

9 MR. O'LAUGHLIN: Can I ask a favor? Can you  
10 scroll back and tell us who owns the license or the  
11 application?

12 MS. TEMPLE: For the record, we are talking  
13 about column AD entitled "factor notes," right?

14 MS. SPALETTA: Correct.

15 MR. O'LAUGHLIN: Go back to 93.

16 Q BY MS. SPALETTA: We are going to row 93. We  
17 are going to scroll all the way back to B to see who  
18 owns that.

19 MR. O'LAUGHLIN: Thank you. Thanks.

20 Q BY MS. SPALETTA: Okay. Now, we are going to  
21 scroll all the way to the last column of the spreadsheet  
22 that we were looking at, which was "notes." Are there  
23 any more columns to this spreadsheet?

24 A Nope. That should be the last one.

25 Q So let's go to the "notes" column. And let's

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1 scroll down until we find a note that is in the  
2 statements section. And just to be clear for the  
3 record, it looks like the data is organized as all of  
4 the application numbers first and then the statement  
5 numbers; is that correct?

6 A It can be -- with the sorting ability, it can  
7 be organized however you want. So right now it is,  
8 yes.

9 Q Okay. So we have located a note that is  
10 associated with statement 2909 which is row 7735 and  
11 column FJ. Can you describe for me what this note is  
12 and what its purpose was?

13 A It appears that I made some adjustment to the  
14 demand. Without looking at the rest of the  
15 spreadsheet, I couldn't tell you.

16 Q There is a name. It is E. Mortazavi. Is that  
17 someone's name?

18 A Oh, that is a coworker.

19 Q Did your coworker make this change?

20 A She asked that I make that change.

21 Q And what is the first name of the coworker? Is  
22 that Eleanor?

23 A No, that is not Eleanor. That is -- Emily, I  
24 believe.

25 Q What was your interaction with Emily with

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1 respect to this spreadsheet?

2 A They were using it for some of their studies  
3 or some of their work. I don't know exactly what.

4 Q Who is "they"?

5 A Other units in the Water Rights.

6 Q And what unit does she work in?

7 A I don't recall.

8 Q So did you share this spreadsheet with her and  
9 then she requested the change?

10 A It was available to anyone on the floor in  
11 the Division.

12 Q All right. We have now looked at all of the  
13 columns in this first tab. We are going to look at the  
14 second tab which is entitled "legend." What information  
15 is on this sheet entitled "legend"?

16 A Everything I just explained. It just  
17 explains what all the tabs are, what all the columns  
18 are for the WRUDS for the previous worksheet. And  
19 it also includes the formulas.

20 Q It also includes the what?

21 A The formulas for the previous sheet.

22 Q Okay.

23 A It just shows what they are.

24 Q We have scrolled down to row 42 in column B.  
25 And it says, "AC (for riparian and pre-14 rights.) The

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1 annual duty that avg\_div\_total would provide for  
2 irrigation is greater than 8 acre feet per acre based on  
3 acreage in net\_acres."

4 What does this refer to?

5 A That is part of the reasonableness check for  
6 statement holders that have a reported net acreage.  
7 Same sort of thing as its face value, a face value  
8 reasonable check. It basically checks to see if --  
9 that the flag identifier, if the total annual  
10 average diversion is greater than the 8 acres. So  
11 if the demand is greater than 8 acre feet per acre,  
12 based on the acreage -- net acreage listed in  
13 eWRIMS, the same sort of reduction was done, as was  
14 done for the post-14 as their face value.

15 Q When you say the same sort of deductions, Do you  
16 mean the demand was reduced to be no more than 8 acre  
17 feet per acre?

18 A Correct.

19 Q Where did the 8 acre feet per acre come from?

20 A My supervisor, Brian Coats.

21 Q And do you have any more information about where  
22 he got it?

23 A No.

24 Q Do you have an opinion about whether it is  
25 correct or not?

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1 A I have no opinion.

2 Q All right. We are going to go to the next  
3 entitled "change log." What information is contained in  
4 the "change log" tab?

5 A That just includes a summary of changes I  
6 made as information becomes known to us on the  
7 demands. It is on the date that it occurred on the  
8 left and what I did on the right.

9 Q I want to ask you about row 8, February 5th,  
10 2015. "Added rights in Legal Delta that are outside of  
11 the Sacramento and San Joaquin Watershed."

12 Can you explain in greater detail what you did?

13 A There is a little -- let's see. There is a  
14 part of the Legal Delta map that is not within the  
15 Sacramento Delta or San Joaquin Delta Watershed -- sort  
16 of around Suisun. So they were not accounted for in the  
17 previous model, so I added those into the model.

18 Q When you say "not accounted for" in the  
19 watershed, what are you referring to as the defined  
20 watershed?

21 A The watershed boundaries that I used in the  
22 analysis.

23 Q And where did those watershed boundaries come  
24 from?

25 A A map in ArcGIS system or a layer in ArcGIS

1 system.

2 Q So when you added those rights, how did that end  
3 up affecting the supply and demand analysis that you  
4 performed?

5 A Probably negligible.

6 Q Which analysis did those demands get included  
7 in?

8 A Any analysis that involved the Delta.

9 Q All right. You say it was "probably  
10 negligible." Did you actually add them up?

11 A I don't recall.

12 Q Would there be a way for us to add them up?

13 A Right here, right now? Probably not.

14 Q How did you code the watershed areas that they  
15 were associated with?

16 MS. TEMPLE: Objection. Vague and ambiguous.

17 THE WITNESS: I don't understand the question.

18 Q BY MS. SPALETTA: So you said that they were not  
19 associated with the two watersheds. And I recall a  
20 prior column in the first tab of this spreadsheet that  
21 had the watershed designation, the HUC designation.

22 Do you recall that?

23 A Yes.

24 Q So how did you code the HUC designation with  
25 these water rights -- or did you?

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1 A They would be assigned an area flag of Legal  
2 Delta.

3 Q Then the row 10 was an April 2nd, 2015 entry:  
4 "Adjusted spreadsheet to use 2014 monthly diversion data  
5 provided by responders to order 2015-0002-DWR."

6 What did you do here?

7 A That is where I replaced that annual average  
8 demand with the actual 2014 demands reported on by  
9 those diverters who are subject to Information Order  
10 2015-0002-DWR.

11 Q Now, the Information Order also asked people to  
12 respond by including their projected 2014 monthly  
13 diversion data. Do you understand that?

14 A Yes.

15 Q Did you do anything with the projected 2014  
16 diversion data?

17 A No.

18 Q I'm sorry. 2015 data, the projected 2015  
19 diversion data.

20 A In this spreadsheet?

21 Q Yes.

22 A No.

23 Q In any other spreadsheet?

24 A No.

25 Q Did you ever analyze the difference between the

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1 projected 2015 diversions and the actual 2014  
2 diversions?

3 A I don't recall.

4 Q Brian Coats testified yesterday that there was  
5 an analysis done that compared the two that showed a 4  
6 percent difference. Does that refresh your memory?

7 MS. TEMPLE: Objection. Vague and ambiguous.  
8 Assumes facts not in evidence.

9 THE WITNESS: Yeah, I don't recall.

10 Q BY MS. SPALETTA: All right. Let's go to the  
11 fourth tab in this spreadsheet which is entitled  
12 "app\_ID adjustments." What information is in this tab?

13 A I think that was an earlier version of my  
14 change log. Yeah, just other adjustments that I  
15 made.

16 Q So what is the first one that is in row 2?

17 MS. TEMPLE: Objection. Vague and ambiguous.

18 Q BY MS. SPALETTA: The first change. It is in  
19 row 2 that says, "Moved primary watershed from San  
20 Joaquin Delta to Shasta Bally."

21 A That was a mis-mapped Delta diversion, so I  
22 moved it to where it was supposed to be.

23 Q Where is Shasta Bally?

24 A Up north.

25 Q Did the demand remain in the spreadsheet?



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1 A Yes.

2 Q How did you determine that there was a need to  
3 make this change?

4 A Through looking at the POD locations in the  
5 ArcGIS system. When I selected a group of PODs that  
6 were supposed to be in the Sacramento area, I  
7 noticed that this one particular POD also appeared  
8 in the San Joaquin, which is much farther south than  
9 Sacramento. And that indicated to me that this may  
10 be mapped incorrectly.

11 Q So what you've just described tells me that you  
12 went through a process of actually looking at where  
13 these PODs are on a map.

14 A Correct.

15 Q Why did you do that process?

16 A To make sure the PODs were located in the  
17 right watersheds.

18 Q Did you look at that map to determine if there  
19 were multiple water rights with the same POD?

20 MS. TEMPLE: Vague and ambiguous.

21 THE WITNESS: Not with that intention, no.

22 Q BY MS. SPALETTA: Did you ever conduct that  
23 analysis?

24 A No.

25 Q Why not?

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1 A I wasn't directed to.

2 Q Actually before we go on, this mapping exercise  
3 that you undertook, do we have copies of the maps that  
4 you looked at somewhere in the PRA response?

5 A I don't think I ever even saved them.

6 Q So let's look at the next tab which is entitled  
7 "manual entries." What is in this tab?

8 A Exactly that. Other entries that I entered  
9 manually, where they did not exist in eWRIMS. You  
10 see a lot of statements there where they were  
11 entered -- their primary or initial statement, that  
12 data was not populated in eWRIMS yet. So I had to  
13 enter that information manually. Those are for some  
14 of them, but that is an example.

15 Q So I'm going to ask Mr. Young, who is sitting  
16 next to me, to freeze columns A and B and then scroll  
17 over.

18 So we have A, B and C on the screen and we are  
19 going to scroll over. We are scrolling through the  
20 columns. These have the same information that we saw in  
21 the first tab. So is it correct to assume that we are  
22 looking at information that was from eWRIMS or to be  
23 entered into eWRIMS from the statement?

24 A It was constructed the same, just so I could  
25 copy and paste easier from one to the other.

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1 Q We have gotten to column H which is entitled,  
2 "adg\_div\_total." What does this column represent?

3 A The same information as on WRUDS. That would  
4 be the total average reported diversions.

5 Q For what time period?

6 A Two thousand --

7 Q I'm sorry.

8 A I have to -- I have to remember where I am.

9 Q I think there is a formula. Was it 2010 through  
10 2014?

11 A No, you are in the wrong column. Yeah.

12 Q So I'm looking at column EH which is entitled,  
13 "average diversion total."

14 A So, yeah. That is the total average  
15 diversions 2010 through 2013 purported by the  
16 diverters.

17 Q I'm looking at row 13, which is statement 24533,  
18 Sierra Pacific Industries, with an average diversion of  
19 a little over a million acre feet a year; is that  
20 correct?

21 A That is correct.

22 Q Was that demand added to the demand data set?

23 A That is not correct.

24 Q Okay. What was done with this demand?

25 A You have to scroll further to the right. It

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1 seems a bit high, doesn't it?

2 MR. O'LAUGHLIN: A lot of dust control.

3 Q BY MS. SPALETTA: So we have scrolled over to  
4 column FG which says "demand total." And it includes  
5 the number for row 13 of a little over a million acre  
6 feet. How was this number used?

7 MS. TEMPLE: Objection. Vague and ambiguous.

8 Q BY MS. SPALETTA: How was the number used?

9 A I don't recall off the top of my head.

10 Q Do you need to scroll over further to the notes?  
11 We have now scrolled over to the notes column F1. And  
12 the note says, "J. Mazell, 2013 diversion amount added  
13 from the initial statement of 2/26/2015."

14 A Now you have to go to the main database to  
15 look up that water right to see what happened to it.

16 Q For this particular water right, did you do any  
17 QA/QC to verify the amount?

18 A I can't recall.

19 MS. SPALETTA: Mr. O'Laughlin would like to  
20 interrupt because he has a specific question.

21 MR. O'LAUGHLIN: So are you saying if we  
22 scrolled back to the original starting point, we would  
23 see whether or not that million acre feet, plus or  
24 minus, was actually included within the --

25 THE WITNESS: Right, yeah. I can't answer

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1 questions on specific water rights.

2 MR. O'LAUGHLIN: From here?

3 THE WITNESS: From there, right.

4 MR. O'LAUGHLIN: From here, right.

5 Q BY MS. SPALETTA: So we will go ahead and do  
6 that right now. We are going to go to the first tab and  
7 we'll do a search for statement 24533.

8 MR. TAURIAINEN: While we are doing that, can I  
9 ask the deponent -- I want to make sure I get his lunch  
10 order so we can get lunch quicker today. Just  
11 15 seconds.

12 (Whereupon, brief interruption in proceedings.)

13 Q BY MS. SPALETTA: We can go back on the record.

14 We are scrolling through the first column of the  
15 first tab to try and find statement No. 24533. We have  
16 located it in row 15192. There we are.

17 So we will scroll over to find out the  
18 information associated with this row. And we look at  
19 column FH and see the number 2. So Mr. Yeazell, can you  
20 explain to us what that means?

21 A That demand looks a lot better, doesn't it?

22 Q So what happened?

23 A You have to scroll back to the beginning of  
24 this spreadsheet, so I can look at the adjustment  
25 factors.

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1 Q Okay. So it has a flag in column W for "manual  
2 entry," a "yes." What other column do we need to look  
3 at?

4 A Hmm. That is interesting. Do we have the  
5 right application ID number?

6 Q 24533, Sierra Pacific Industries, dust control.  
7 24533. So by "manual entry," does that mean that you  
8 went in and put the "2" in there.

9 A I know I did something to make the demand more  
10 reasonable. And 2 acre feet per year is a lot better  
11 than 1 million acre feet, especially for dust control.  
12 So the diverter should be happy for that.

13 Q Okay. So basically I think what we have learned  
14 from this is that whatever the numbers are in this first  
15 tab, those are the ones that actually got used in the  
16 supply and demand analysis?

17 A Yes, that is correct.

18 Q All right. Now we have another question. We  
19 are back on the "manual entries" sheet. You previously  
20 told me that you made some changes to the spreadsheet  
21 based on input you received from MBK Engineers. Are  
22 those reflected here in the "manual entry" tab?

23 A I don't see them in that one.

24 Q Would they be reflected, though, in the "manual  
25 entry" tab in another version?

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1 A Possibly.

2 Q Let's go to the next tab, which is the last tab  
3 of this spreadsheet entitled, "order\_DIV\_2014. "What is  
4 in this sheet?

5 A Those are the reported diversions of the  
6 statement holders subject to the Information Order.

7 Q Which reported diversions?

8 A 2014.

9 Q The actual diversions?

10 A As reported by the diverters.

11 Q And so, then, was this information populated  
12 into the first tab?

13 A Yes.

14 Q Okay. So now we are going to go back to the  
15 State Board Website, Water Availability Analysis page,  
16 where we located this spreadsheet. You already told us  
17 that the next spreadsheet which has the same name -- but  
18 was updated June 15th, 2015 -- would be similar, except  
19 may include some updated modifications, correct?

20 MS. TEMPLE: Objection. Vague and ambiguous.

21 THE WITNESS: Yes. But without looking at it  
22 exactly, I couldn't confirm that.

23 Q BY MS. SPALETTA: So it is almost 42 megabytes.  
24 So we are going to download that over lunch and we will  
25 look at it when we come back instead of taking the time

1 now.

2 But let's go to the next item under which is  
3 entitled, "Combined Sacramento/San Joaquin Watershed  
4 with Delta." Open that up and it is a graph. Is this a  
5 graph that you prepared?

6 A Yes.

7 Q And is there a supporting spreadsheet for this  
8 graph?

9 A Being that the demand and the supply are --  
10 yes.

11 Q So if we go back to the website, we see right  
12 underneath this graph, there is a link to a supporting  
13 analysis spreadsheet. Is that the spreadsheet that  
14 supports the graph?

15 A Without looking at it, I can't answer.

16 Q Well, I don't want to open that one because I  
17 need to ask you another question first. Do you know  
18 which one of these graphs and spreadsheets was used to  
19 support the May 1st curtailment?

20 A No.

21 Q So we are going to go, then, with what Mr. Coats  
22 told us yesterday. Mr. Coats told us yesterday that it  
23 was the "Sacramento River with Prorated Delta Demand"  
24 analysis that related to the May 1st curtailment. And  
25 you see that link under "Sacramento River Watershed" on



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1 this page?

2 A Okay. Yes.

3 MS. TEMPLE: Objection. Assumes facts not in  
4 evidence.

5 Q BY MS. SPALETTA: We are going to go ahead and  
6 open up that "Sacramento River With Prorated Delta  
7 Demand" and that opens up a graph. We previously marked  
8 this yesterday as Exhibit --

9 MR. VERGARA: 13.

10 MS. SPALETTA: 13.

11 MS. MCGINNIS: I don't think they are the same.

12 MS. ZOLEZZI: One is black and white.

13 MS. MORRIS: They have a different date.

14 MS. SPALETTA: I believe they have a different  
15 date on the bottom because when we printed, it printed  
16 the date that we printed it.

17 MS. MORRIS: For the record, Exhibit 13 is not  
18 really what is on the screen. You can see it has the  
19 "D" down here. And the line where it says, "projected  
20 senior demand" on the bottom right-hand corner, what is  
21 on the screen is dashed where as here it is not dashed.

22 MS. SPALETTA: Okay. So what we are going to do  
23 is we are going to go ahead and print what we are seeing  
24 on the screen. And we will make that a new exhibit and  
25 we will print it in color.

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1 Q Mr. Yeazell, the graph that we see on the screen  
2 that we will mark as Exhibit 27, is this the graph that  
3 you prepared?

4 A Yes.

5 MS. MORRIS: Counsel, it appears to be marked as  
6 Exhibit 11, what you were projecting on the screen.

7 Q BY MS. SPALETTA: Mr. Yeazell, could you look at  
8 Exhibit 11 to see if that is the graph you were  
9 projecting on the screen?

10 A Yes.

11 Q Okay, good. Then we don't have to mark another  
12 exhibit. Then we have Exhibit 11 from yesterday, which  
13 is the "Sacramento River Basin Supply/Demand Analysis  
14 With Proportional Delta Demand," which you testified you  
15 prepared.

16 Now, there was a spreadsheet link under this  
17 graph on the website, so let's go back to the website.  
18 We are going to open up the Supporting Analysis  
19 Spreadsheet.

20 MS. TEMPLE: For the record, the link you just  
21 clicked on is on page 3 of Exhibit 12 entitled  
22 Supporting Analysis Spreadsheet, 18.31 megabytes,  
23 correct?

24 MS. SPALETTA: Correct.

25 Q So we have opened up the Supporting Analysis

1 Spreadsheet and it has a file name of  
2 "sacprorated.xlsx." Do you recognize this spreadsheet?

3 A Yes.

4 Q And is it the spreadsheet that supports the  
5 graph that we previously marked as Exhibit 11?

6 A Yes.

7 Q Now this spreadsheet has multiple tabs. One of  
8 the tabs is entitled "Chart" and it shows us the chart,  
9 but it does look a little bit different than what we  
10 marked as Exhibit 11, right? Are the differences other  
11 than just display issues?

12 MS. TEMPLE: Objection. Vague and ambiguous.  
13 Assumes facts not in evidence. Are you talking about  
14 where it says "Projected Senior" and the "d" is falling  
15 down? That is a solid line with a dash, so it is not  
16 the same as Exhibit 11.

17 MS. SPALETTA: Correct. It looks like it is the  
18 same as Exhibit 13.

19 MS. TEMPLE: Is there a question pending?

20 MS. SPALETTA: I'm trying to formulate one.

21 MS. TEMPLE: Okay.

22 Q BY MS. SPALETTA: Mr. Yeazell, can you tell us  
23 whether there is any substantive difference between the  
24 graphs that we have marked as Exhibit 11 and Exhibit 13?

25 MS. TEMPLE: Objection. Vague and ambiguous.

1 THE WITNESS: I don't see any.

2 Q BY MS. SPALETTA: So the chart that is depicted  
3 on the screen, is it the same as what we have marked as  
4 Exhibit 13?

5 A Yes.

6 MS. TEMPLE: Except Exhibit 13 is in black and  
7 white.

8 MS. SPALETTA: Can we have a stipulation on the  
9 record to replace Exhibit 13 with a color copy of the --  
10 graph?

11 MS. TEMPLE: Yes.

12 MS. SPALETTA: We will do that at the next  
13 break.

14 MS. TEMPLE: Sure.

15 Q BY MS. SPALETTA: What I would like to do at  
16 this point is start with this chart, Mr. Yeazell, and  
17 have you walk us through where the information is that  
18 ends up getting depicted on the chart.

19 So let's start with the demand information.  
20 At the bottom of the chart, there is a light yellow area  
21 entitled, "Riparian Demand." Do you see that?

22 A Yes.

23 Q What does that light yellow area represent?

24 A The riparian demand.

25 Q Where?

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1 A In the Sacramento River Basin with parts of  
2 it in the Delta.

3 Q Now is there another tab in this spreadsheet  
4 that includes the data compilation that results in the  
5 light yellow area on the chart?

6 A Yes.

7 Q Where is that?

8 A For the riparian, it would be -- can you  
9 scroll the tabs over to the left?

10 Q Yes.

11 A It would be a combination of the "WRUDS 2015"  
12 tab and the "Delta senior combining" tab.

13 Q So we are going to open the "Delta senior  
14 combined" tab. This tab looks very similar to the  
15 "WRUDS" tab that we previously went through, as far as  
16 the columns. Am I correct in that?

17 A Yes.

18 Q What are the differences?

19 A This spreadsheet just has the demands for the  
20 Legal Delta in it.

21 Q So where do you get the numbers that are  
22 represented in the "riparian demand" in the light yellow  
23 on the chart?

24 A So if you scroll to the left a little bit --  
25 okay, stop. And you select "riparian." You filter

1 the "riparian," just check on "riparian" which it  
2 already is. So only the riparians are shown -- the  
3 only water rights that have a riparian claim as  
4 indicated in eWRIMS are selected.

5 And if you scroll all the way to the bottom  
6 to the right, you will see the subtotals of the  
7 demands. And you scroll all the way to the bottom  
8 of the table.

9 Q The graph we are looking at, though, on Exhibit  
10 13, does it only represent the Delta demand in the Delta  
11 or does it represent riparian demand in the larger area  
12 than the Delta?

13 MS. TEMPLE: Objection. Compound.

14 THE WITNESS: Yes, a portion of the Delta  
15 plus -- it includes demand from the Delta and the  
16 Sacramento River Basin.

17 Q BY MS. SPALETTA: So the tab we are looking at  
18 here is entitled, "Delta senior combined." Does that  
19 include both of those types of riparian demands?

20 A No, just the Delta.

21 Q So where is the number that was used for each  
22 month?

23 A Those are the subtotals. And right now it is  
24 filtered at row 2405. So those are the Delta  
25 riparian demands. And then those numbers are copied

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1 into the -- scroll to the right a bit -- "demand  
2 summary."

3 Q Let's take a representative month. We have got  
4 demand in June of 176,421 acre feet. So if we open up  
5 the "demand summary" tab, where do we find that number.

6 A So you see it at "Delta, June."

7 Q Got it.

8 A Is it the same number?

9 Q Yes.

10 MS. TEMPLE: So E7, for the record?

11 Q BY MS. SPALETTA: Correct. Now looking at this  
12 "demand summary" tab, there is also a row for "Delta  
13 south of Mossdale." And the number there is 1780.  
14 Where does that number come from?

15 A That will come from your main -- that will  
16 come from your "riparian demand pivot" tab. You can  
17 close the pivot window. It is already set up.

18 So I filter -- so basically that queries the  
19 WRUDS, the main tab, the WRUDS -- whichever  
20 that first one is -- yeah, that one, the "WRUDS  
21 2015-08-28" tab. So that queries that. So with the  
22 filters up top, I can filter out the Delta. So the  
23 area is the Delta south of Mossdale.

24 Q Why were you filtering for that area?

25 A I was directed to treat that -- even though

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1 it is within the Legal Delta, I was directed to  
2 treat that as part of the San Joaquin.

3 Q Let's go back to the "demand summary." You said  
4 you were directed to treat it as part of the San  
5 Joaquin. Why is it in the "demand summary" for the  
6 "Sacramento River Basin With Proportional Delta Demand"?

7 MS. TEMPLE: Objection. Vague and ambiguous.

8 THE WITNESS: In this case, for this particular  
9 spreadsheet, I was directed to.

10 Q BY MS. SPALETTA: By whom?

11 A Brian Coats.

12 Q Do you know why?

13 A No.

14 Q So then looking again at this Demand Summary  
15 Spreadsheet and looking at column E, row 5, there is a  
16 number for June for Sacramento at 62,858. Where does  
17 that number come from?

18 A That comes from the "WRUDS" tab by way of the  
19 "riparian demand pivot."

20 Q So there is another tab called "riparian demand  
21 pivot." We will open that. How would you use this tab  
22 to get to that number?

23 A So that pivot table just queries the "WRUDS  
24 demand" table. And you select that top filter, you  
25 select that to be "Sacramento." You unselect "Delta



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1 south of Mossdale."

2 Q Close the filter?

3 A Yes, close the filter.

4 Q So if we scroll down to the end of June, we see  
5 62,858.

6 A Okay.

7 Q So going back to our chart. Our chart in June,  
8 the light yellow area appears to be somewhere in the,  
9 what, 2800 CFS range; is that right?

10 A Approximately.

11 Q So where is that number coming from that is  
12 driving the depiction on the chart, the 2800 CFS?

13 A That would be from the "chart data" tab.

14 Q We open the "chart data" tab. Can you show me  
15 exactly where that is?

16 A So you would to scroll down to a particular  
17 date.

18 Q Let's look at June. On June 1st, walk us  
19 through what we are seeing there on row 105 on the  
20 "chart data" tab.

21 A So you have your date, your riparian demand  
22 in acre feet, your pre-14 demand in acre feet, and  
23 other post-14 demand for 1927, post-14 demand for  
24 1948, point column, riparian demand in CFS, pre-14  
25 demand in CFS. And I believe these are

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1 accumulative.

2 Q What does that mean?

3 A They are just added together. So the pre-14  
4 -- "all" is riparian, plus pre-14.

5 Q What is the difference between the post-14 A, B  
6 and C?

7 A They are just different. I can add or --  
8 they are different lines I can plot on the map just  
9 to compare, just to show what the total demand is up  
10 to that priority date.

11 Q What priority date did you select for the cutoff  
12 of the A, B and C date?

13 A C wasn't used. In this particular  
14 spreadsheet, I used 1927 and 1948.

15 Q I am sorry. What?

16 A C was not used. In this particular  
17 spreadsheet, I used 1927 and 1948.

18 Q As Group A or Group B?

19 A A is 1927; B is 1948.

20 Q Why did you pick those two dates?

21 A No particular reason. Those seemed to match  
22 the area of the -- I guess that is a reason. That  
23 seemed to be bracketing the area where the full  
24 natural flow was at that time.

25 Q I want to make sure I understand this. Were you

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1 trying to see how much of the demand could be covered by  
2 what you were computing as full natural flow on given  
3 dates?

4 A Correct.

5 Q Is that break of dates reflected on the chart?

6 Let's go back to the chart which, I guess, is

7 Exhibit 13. Can we see that break here?

8 A Yeah. The red-dashed line is 1927. The

9 solid-red line is 1948.

10 Q So you only looked at that information after the

11 end of September?

12 A No, we just plotted it after September.

13 Q But you did look at it earlier in the year?

14 A Yes.

15 Q Was there any effort to plot it earlier in the

16 year?

17 A For the -- it is kind of a vague question.

18 Q Was it plotted before the end of September?

19 A Not for this particular spreadsheet that we

20 are looking at.

21 Q Why not?

22 A I wasn't directed to.

23 Q Okay. Let's go back to your chart data. On the

24 chart, there is the "riparian demand" in the light

25 yellow and there is a darker color for the "pre 1914

1 demand." Can we see here on this "demand summary" tab  
2 where the data is that results in the "pre 1914 demand"  
3 as it is depicted in the chart?

4 A That would be the columns that are entitled,  
5 "pre-14 all."

6 Q Which is column M?

7 A Or H or C. Those are basically just the data  
8 points used to construct the graph.

9 MR. O'LAUGHLIN: But doesn't H include the  
10 "riparian demand," not just the "pre-14"?

11 MS. TEMPLE: Objection. Vague and ambiguous.

12 THE WITNESS: Yes, but that was used to create  
13 the "post-14" line.

14 Q BY MS. SPALETTA: So we have now reviewed the  
15 data that has been used to depict the "riparian demand"  
16 and the "pre-1914 demand" on our chart, Exhibit 13. And  
17 we have also reviewed the data that was used to depict  
18 the red lines for the 1948 and 1927 data, pre-1914  
19 subsets. Is there any other demand data depicted on  
20 this chart? I think there is. There is the green line?

21 A Correct.

22 Q So there are two different labels for the green  
23 line on the chart. The first label is "adjusted  
24 senior." And the second label is "projected senior."  
25 What does "adjusted senior" refer to?

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1 A That is the reduction or the difference in  
2 demand from what was originally reported for the  
3 2010 through 2013 eWRIMS data. And with the 2014  
4 Informational Order, data demands included -- and  
5 these are the reductions or the change, looking at  
6 what was actually diverted in 2013 as reported by  
7 the diverters under the Information Order.

8 Q So just to clarify. The green line that is  
9 entitled "adjusted senior" is the actual 2015 diversion  
10 information as reported on the monthly Information Order  
11 reports in 2015?

12 A Correct.

13 Q And where is that information in the tabs of  
14 this spreadsheet?

15 A Further to the right.

16 Q Which tab?

17 A Keep going. That would be in your "2015  
18 pre-14 actual" and "2015 riparian actual."

19 Q For people who reported both riparian and  
20 pre-1914 right, how did you treat their demand data?

21 MS. TEMPLE: Objection. Vague and ambiguous.

22 Q BY MS. SPALETTA: Do you understand the  
23 question?

24 A I understand the question. For what -- for  
25 which holders?

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1 Q Okay. So let's start with these actual use  
2 numbers from 2015 provided in the Information Order.  
3 Did you do anything with this data for people who  
4 claimed both the riparian and pre-1914 rights?

5 A No.

6 Q So this data just comes straight out of what  
7 they populated on the website when they filled out their  
8 report?

9 A For their 2015 diversions, yes.

10 Q So if someone reported diverting under a  
11 pre-1914 right, it shows up in your pre-1914 actual  
12 data?

13 A Did you say "2015 actual data"? Under which  
14 tab?

15 Q Let me repeat the question.

16 If someone filling out the Information Order  
17 reported a diversion in 2015 under a pre-1914 right, it  
18 shows up in the tab entitled "2015 pre-1914 actual"?

19 A Correct.

20 Q And then if someone is filling out the same  
21 report, reported diversion under the riparian cell, it  
22 shows up as "2015 riparian actual"?

23 A Correct.

24 Q Now going back to the WRUDS database, which has  
25 all the application and statement information in it,

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1 isn't it true that some people who filled out statements  
2 claimed both a riparian and pre-1914 right?

3 A Yes.

4 Q But they only reported their diversions as one  
5 lump sum, right?

6 A Correct.

7 Q How did you treat those diversions for the  
8 people who claimed both the riparian and pre-1914  
9 rights?

10 A As riparians.

11 Q And was that a decision that you made?

12 A No.

13 Q Who told you to do that?

14 A My supervisor, Brian Coats.

15 Q Was there any discussion about that?

16 A No.

17 Q All right. So turning back to our chart which  
18 is Exhibit 13, we have talked about the "adjusted senior  
19 demand" which is green. Now let's talk about the  
20 "projected senior," which is also a green line but  
21 covers actually the October through November time frame.

22 Where is that data noted?

23 A "IO 2015 adjustment" tab.

24 Q Walk us through what is depicted on this "IO  
25 2015 adjustment" sheet.

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1 A So basically this workbook -- the 2015 data  
2 was more for looking at water availability to  
3 release the notices of unavailability. So to get an  
4 idea of what -- we use that information, the 2015  
5 actual diversions, to see what those under the  
6 Informational Order actually used and see if we  
7 could reduce demand even more to release -- to  
8 bring -- I'm sorry -- to use more current data  
9 basically from the Information Order to see what the  
10 demand looked like.

11 Q All right. Looking at this tab on the "IO 2015  
12 adjustments" and let's just take June as representative  
13 here. We have a number of 12,942 in cell E 6. Does  
14 that represent the actual acre feet of diversions  
15 reported on the Information Order for the Sacramento  
16 area in June?

17 A No.

18 Q That is 2014 data. Okay. Sorry.

19 Are those the same numbers that we looked at  
20 before for the riparians?

21 MS. TEMPLE: Objection. Vague and ambiguous.

22 Q BY MS. SPALETTA: For 2014.

23 A Without comparing the two side by side --  
24 they should be but I can't say.

25 Q Let's just walk through this. The first part of



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1 this table, which is rows 5 through 12, what does it  
2 represent?

3 A The riparian diversions for 2014.

4 Q And when we look at row 9, it is entitled,  
5 "Return flow adjustment" and it has an adjustment of  
6 60 percent. What is that?

7 A That was the adjustment made for the Delta  
8 demand, assuming a 40-percent return flow.

9 Q Who made that decision to put the 60 percent in  
10 there?

11 A I don't know.

12 Q Who told you to do it?

13 A Brian Coats.

14 Q Did you discuss it with anyone?

15 A No.

16 Q Do you have an opinion regarding its accuracy?

17 A I have no opinion.

18 Q The next row is row 10. It says "FNF ratio" and  
19 it has the number 82.8 percent. What does that  
20 represent?

21 A That is the contribution of the Sacramento River  
22 Watershed full natural flow to the Delta based on a  
23 90-percent full natural flow exceedance forecast from  
24 the Bulletin 120 DWR documents.

25 Q Can you put your curser on 82.8 percent. So

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1 that is a hard-entered number, it appears. There is no  
2 formula, right?

3 A Right.

4 Q Where is the formula that gives us that number?

5 A That is in another spreadsheet.

6 Q Which one?

7 MS. TEMPLE: He is looking at Exhibit 5.

8 THE WITNESS: Yeah, it is in a different folder.

9 Q BY MS. SPALETTA: Which folder is it in?

10 A I think it is the "water supply."

11 Q You are looking at Exhibit 5, which is file list  
12 of some of the items produced in the Public Records Act  
13 request. So we are going to go ahead and pull that up  
14 and see if we can locate the proper file. It is the  
15 last one on there.

16 So we have pulled up the contents of the first  
17 PRA request. It has various subfiles. Should we be  
18 looking in the Water Availability subfile?

19 A Yes.

20 Q We'll open that up. And our four choices are:  
21 1977 drought report, 2014, 2015, or unimpaired flow.

22 A Unimpaired flow.

23 Q Then we have a list of several files on the  
24 screen. Which file would contain the formulas that  
25 resulted in the percentages we were just discussing?

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1 A Okay. I'm not seeing it there.

2 Q This is something that you want to peruse over  
3 the lunch hour maybe.

4 A Yeah. There it is (indicating.)

5 Q So you are looking at Exhibit 5?

6 A Yes. I'm looking at Exhibit 5. Water  
7 Availability. Are we in Water Availability.

8 Q Okay.

9 A 2015 -- 20150612 notice. And then WY 2014-  
10 2015, the CDEC supply tables. And if you scroll to  
11 the last tab.

12 Q This tab is entitled, "B 120 - May 2015  
13 forecast"?

14 A Yes.

15 Q What are we looking at in this tab?

16 A Can you shrink it a bit, so we can see more?  
17 There we go. So each of those tables are the full  
18 natural flow forecasts from the May Bulletin 120  
19 from the Department of Water Resources for each of  
20 the various stations.

21 If you scroll down a bit -- keep going. If  
22 you go to the "combined 90-percent table." So there  
23 we have -- so for each month, we have the full  
24 natural flow of the four Sacramento stations, and  
25 then the full natural flow of the San Joaquin Basin

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1 stations.

2 Q Okay.

3 A There we go. And then we have the total full  
4 natural flow at the 90-percent exceedance level.  
5 And then the proportion of that total for the  
6 Sacramento and then the San Joaquin basins.

7 Q So we see in this chart for June 2015, you have  
8 the percentage calculated. It represents Sacramento at  
9 82.8 percent which matches the percentage we were just  
10 looking at, correct?

11 A Correct.

12 Q And that includes the formula. That cell  
13 includes the formula?

14 A Yeah. You can see it there on top.

15 Q Cell E 122.

16 A Okay.

17 Q Who came up with this methodology?

18 MS. TEMPLE: Objection. Vague and ambiguous.

19 Q BY MS. SPALETTA: Who came up with the  
20 methodology that is depicted in the tab we are looking  
21 at, which is "B 120 - May 2015 forecast"?

22 MS. TEMPLE: Objection. Vague and ambiguous.

23 THE WITNESS: Can you repeat the question?

24 Q BY MS. SPALETTA: Let me ask it differently. It  
25 is probably not being asked well. Who told you to do

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1 this?

2 A My supervisor.

3 MS. TEMPLE: Objection. Vague and ambiguous.

4 THE WITNESS: My supervisor, Brian Coats.

5 Q BY MS. SPALETTA: Did he tell you why?

6 A Yes.

7 Q What did he tell you?

8 A How some sort of estimate as to how much each  
9 greater watershed contributes full natural flow to  
10 the Delta.

11 Q Any more to the explanation than that?

12 A No.

13 MS. SPALETTA: All right. Let's go ahead and  
14 close this file. It is 12:01. We'll take our lunch  
15 break and when we come back, we will get back into  
16 it.

17 (Whereupon, a lunch recess was taken.)

18 MS. SPALETTA: Back on the record after lunch  
19 break. We took advantage of the lunch break to mark  
20 two exhibits. One was a replacement of Exhibit 13,  
21 which was a color version of the graph that is  
22 associated with the spreadsheet we have been  
23 reviewing from the State Board website entitled  
24 "sacprorated.xlsx."

25 We also marked Exhibit 27, which is a

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1 printout of the chart from the "demand summary" tab  
2 of the same spreadsheet, "sacprorated.xlsx.

3 (Whereupon, Exhibit No. 27 was  
4 marked for identification.)

5 Q BY MS. SPALETTA: Mr. Yeazell, can you just  
6 confirm that Exhibit 27 is, in fact, a printout of the  
7 chart?

8 MS. TEMPLE: Objection. Vague and ambiguous.

9 THE WITNESS: Yes, it is.

10 Q BY MS. SPALETTA: I'm noticing it only has the  
11 first two categories. It doesn't have the Information  
12 Order and the demand data set, so I think we will need  
13 to reprint this one. Did you notice that as well?

14 A Can you repeat the question?

15 Q Sure. The printout I just gave you doesn't  
16 appear to contain everything in this tab.

17 A Correct.

18 Q It just has the riparian and pre-1914 demand for  
19 March through September, and then the pre-1914 only  
20 demand?

21 A Correct.

22 Q As far as the information that is depicted on  
23 the chart, is all of that demand information on  
24 Exhibit 27 or do we need to print something else to get  
25 all the demand information?

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1 MS. TEMPLE: Objection. Vague and ambiguous and  
2 compound.

3 THE WITNESS: All the additional information on  
4 that spreadsheet that is not on the printout is used to  
5 create the green lines on the chart.

6 Q BY MS. SPALETTA: Okay. We'll go back then and  
7 make a new printout. But for now, let's continue our  
8 discussion that we were having before we broke for  
9 lunch.

10 You'd just explained to us Excel cell E 9,  
11 82.8 percent. You had walked us through the process and  
12 the other spreadsheet that was used to come up with that  
13 number. So let's move onto the next cell below, which  
14 is E 10. It has an adjusted Delta number of  
15 89,233 acre-feet.

16 Where does that number come from?

17 A That is multiplying the Delta demand by the  
18 return flow adjustment by the full natural flow  
19 ratio.

20 Q Is that 176,421, times 60 percent, times  
21 82.8 percent?

22 A Correct.

23 Q And why was that done?

24 A That adjusts -- that takes the Delta demand  
25 from the "Delta demand" summary tab. Then it is

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1 adjusted for the 60 percent. So the 40 percent  
2 return flow, and then the contribution of the  
3 Sacramento Basin full natural flow to the Delta.

4 Q Now I'm looking at the formula for E 10 and it  
5 looks different than what you just described. It has  
6 two things at the end.

7 MS. TEMPLE: Objection. Vague and ambiguous.

8 THE WITNESS: Oh, plus the Sacramento  
9 contribution to the Delta south of Mossdale.

10 Q BY MS. SPALETTA: Multiplied by the full natural  
11 flow ratio?

12 A Correct.

13 Q Does that mean that the return flow adjustment  
14 is not being applied to the Delta south of Mossdale?

15 A Correct.

16 Q Why not?

17 A I was not directed to do that.

18 Q This "demand summary" information in the format  
19 that we are looking at right here on the Excel  
20 spreadsheet, was that shared with Brain Coats?

21 A I didn't directly share it, but I knew it was  
22 on our drive, so he could have had the opportunity  
23 to look at it.

24 Q Did you discuss the methodology of the return  
25 flow adjustment with him?



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1 A Yes.

2 Q Did you also discuss the adjustment of the full  
3 natural flow with him?

4 A Yes.

5 Q Did you discuss it with Mr. O'Hagan?

6 A Not that I recall.

7 Q Did you discuss it with anyone else that you  
8 recall?

9 A No.

10 Q So now let's look at the next cell which is --  
11 I'm sorry. Strike that.

12 Before we go on, the adjusted Delta number,  
13 which is the 89,233, is that supposed to represent  
14 diversion demand or consumptive use demand?

15 A That is the demand reported by the Delta  
16 diverters who responded from, as of the 2014 demand,  
17 from the diverters who responded to the monthly 2015  
18 Informational Order to the demand.

19 Q What is the purpose, though, of the 60-percent  
20 adjustment factor as you've described the way it is?

21 A That is supposed to account for the  
22 40-percent return flow in the Delta.

23 Q So the next cell, which is E 11, has a total of  
24 152,091 acre feet. What does that number represent?

25 A That is some of the Sacramento demand for

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1 June, plus the adjusted Delta demand for June.

2 Q Is that number reflected on the chart?

3 A Yes.

4 Q How do we get from here to there?

5 A There are still further steps that you have to  
6 take to get to that number.

7 Q Walk us through the step, please.

8 A So, you do the same thing for the "pre-14,  
9 only" demand -- basically the same thing that I did  
10 for the "riparian pre-14" demand but just using the  
11 "pre-14 only" demand.

12 Q For the record, that is reflected in rows 13  
13 through 21 of the spreadsheet?

14 A Can you scroll down? So then we have the  
15 "2015 Informational Order Demand Adjustment." So we  
16 have the "total senior demand" which is the sum of  
17 the "pre-14 only" and the "riparian," plus the  
18 "pre-14" above.

19 Q Which is in cell E 25, the 533,347 acre feet?

20 A So that is the sum of the "riparian" and  
21 "pre-14 only," minus the reduction -- where are we  
22 at -- the demand summary. Okay. So the reduction,  
23 the "IO reduction" is the difference between the  
24 2014 and 2015 demand from the Informational Order  
25 data set which would be your --

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1 Q So E 26 represents the difference between the  
2 2014 --

3 A -- and the 2015, just for those diverters who  
4 responded to the 2015. I had to compare apples to  
5 apples. So then that is the baseline "total senior  
6 demand," which represents the solid green line on the  
7 chart.

8 Q So the 393,885 acre feet in cell E 27 is the  
9 "adjusted senior demand" reflected in the green line for  
10 June on the chart that we have marked as Exhibit 13?

11 A Yeah. If you go to the "chart data" tab, you  
12 will see the row 6, column F.

13 Q Is that the same number?

14 A That is the same number.

15 Q 393,885.

16 A So that represents the "senior demand" for  
17 June, taking the 2015 actual data into account from  
18 those who reported for the 2015 Informational Order  
19 into account.

20 Q Okay.

21 A And the bottom rows at the bottom convert the  
22 acre feet into cubic feet per second, so I can plot  
23 it on the graph.

24 Q So we are now looking at the chart data. And  
25 when you say "bottom rows," you are referring to rows 10

1 and above?

2 A Correct.

3 Q All right. I believe we have now discussed the  
4 data that corresponds to both of the green lines on  
5 Exhibit 13. Let's look at the red lines on Exhibit 13.  
6 First, the solid red line entitled, "Projected post-14  
7 demand through 1948."

8 A The same spreadsheet that I just described.

9 Q It was just projected out?

10 A Those are not projected out, no.

11 Q Where does that data come from that forms the  
12 red line? I think earlier you told me it was on the --

13 A All I can say is it is all in that  
14 spreadsheet.

15 Q Is it in the "IO 2015 adjustments" tab?

16 A No. It is right there. There is the source.  
17 Thank you.

18 Q So we have a reference to the column X in the  
19 "chart data" tab. You scroll down to October. We have  
20 numbers in there. Where do those numbers come from?

21 A That is the "post-14 demand" for whatever  
22 year it corresponds to, "post-14 B" from the  
23 "post-14 pivot" table.

24 Q So look at the "post-14 pivot" tab, which is a  
25 different spreadsheet. We have opened up the "post-14

1 pivot" tab. What is in this tab?

2 A And as you are seeing it right now, that  
3 represents the accumulative running total of post-14  
4 demand in the Legal Delta for the months of March  
5 through November.

6 Q And that comes from the WRUDS database analysis?

7 A Correct.

8 Q Now I take it that the same explanation would  
9 apply to the red dotted line on Exhibit 13. We would  
10 just be looking at a different subset with different  
11 priority dates?

12 A Correct.

13 MS. TEMPLE: Objection. Vague.

14 Q BY MS. SPALETTA: Did you understand the  
15 question?

16 A Correct. Yes, I did.

17 Q Okay. Now let's turn to the supply information  
18 on the charts. Let's look again at Exhibit 13. And we  
19 have -- correct me if I'm wrong -- but we have on this  
20 chart supply depicted with two different things: one  
21 being a solid blue line labeled "daily FNF" and another  
22 being a dotted blue line labeled, "2014 actual monthly  
23 FNFs." Is that correct?

24 A I'm not seeing "actual monthly FNFs." Oh  
25 that, yes. Okay. Yes, correct.

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1 Q Other than those two lines, is there anything  
2 else on this chart that relates to supply?

3 A No.

4 Q Let's start with the daily FNF, which is the  
5 solid blue line that goes up and down. What does that  
6 line represent?

7 A The daily full natural flow is from the --  
8 from the four tributary stations in the Sacramento  
9 River Basin.

10 Q Is that the only information that is compiled to  
11 result in that solid blue line?

12 A Yes.

13 Q So is there a tab that includes that information  
14 as part of the spreadsheet?

15 A That is in the -- that previous spreadsheet  
16 we opened.

17 Q Okay. So let's take a sample, so that we can  
18 actually trace the exact number. If we open up the  
19 "chart data" tab in our spreadsheet "sacprorated.xlsx,"  
20 and we go to June 1st for the daily full natural flow in  
21 column Q. The June 1st, full natural flow, column Q is  
22 7458 acre feet; is that correct?

23 A Yes.

24 Q And that is the value that is plotted in the  
25 solid blue line on the chart?

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1 A Yes.

2 Q Is that CFS or acre feet?

3 A CSF.

4 Q Now where do I go to find the source of that  
5 number?

6 A To the Water Availability 2015 -- 20150612  
7 notice folder.

8 Q The May 1st folder?

9 A The one on the top, 201506. Then the "WY  
10 2014/2015 CDEC Supply Tables" spreadsheet.

11 Q So the number we are looking for was for June  
12 1st and it was for 7458 CFS. Where can we find that in  
13 this spreadsheet entitled, "WY 2014/2015 CDEC Supply  
14 Table"?

15 A Make sure you are on that first tab. It  
16 says, "CDEC daily." Go to the corresponding date  
17 and you are column H. That is the sum of the four  
18 Sacramento stations' full natural flows.

19 Q Where did you get the data for the four  
20 stations' full natural flow?

21 A The Department of Water Resources CDEC  
22 website.

23 Q How frequently would you download that data to  
24 populate the spreadsheet?

25 A I tried to be as current as the data was

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1 provided, so at least two or three times a week --  
2 daily if I could.

3 Q We are looking at this spreadsheet and some of  
4 the numbers are red and some are black. Why is that?

5 A The reds indicate that they were flagged as  
6 estimated values on the website.

7 Q Did you ever go in and change them from an  
8 estimated value to something else later?

9 A No.

10 Q So if it showed up as estimated, it just got  
11 plugged in that way and remained that way?

12 A As long as that remained that way on the  
13 website. I updated it to reflect whatever was in  
14 the website -- for the previous usually two weeks,  
15 just to make sure nothing had changed.

16 Q So this particular file that was produced as  
17 part of the Public Records Act request, how current is  
18 the data that appears in it?

19 A Scroll down to the bottom -- September 29th.

20 Q And are you continuing to update a spreadsheet  
21 like this at your office?

22 A Yes.

23 Q We are looking at the lower part of this  
24 spreadsheet in row 357 and the box is yellow with a dash  
25 in it. What does that mean?



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1 A That means there was a negative value there  
2 and we treated it as a zero. And I just flagged it  
3 as yellow to indicate that is what we had done.

4 Q Did you use zero when you did the summation?

5 A Yes.

6 Q Why?

7 A Because I was directed to by Brian Coats.

8 Q Did you ask him what to do about that?

9 A I don't recall.

10 Q But you recall him directing you?

11 A I recall we had a discussion but I don't  
12 remember how it proceeded.

13 Q So why is the daily full natural flow used to  
14 depict supply in the chart?

15 A Because that is how I was directed to do the  
16 analysis.

17 Q Now, yesterday Mr. Coats explained to us two  
18 other sources of supply that were considered in the  
19 Water Availability Analysis. The first was additional  
20 flows from a 2007 DWR report. Does that sound familiar  
21 to you?

22 A Uh-huh. Yes.

23 Q Was that additional information included in the  
24 supply analysis that resulted in the blue line on  
25 Exhibit 14?

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1 A No.

2 Q Why not?

3 A Because I was directed not to do that.

4 Q By Brian?

5 A Yes.

6 Q Do you understand what the rationale was behind  
7 that direction?

8 A Yes.

9 Q Can you explain it, please?

10 A Because that was put in the full natural flow  
11 forecast lines which are not on this graph.

12 Q Do you understand that additional flow data,  
13 though, to represent additional supply in the watershed?

14 A Can you repeat the question?

15 Q Did you understand that additional flow  
16 information from the 2007 DWR report to represent  
17 additional supply in the watershed?

18 A Yes.

19 Q So do you agree with not depicting that  
20 additional supply as part of the available supply on  
21 your chart?

22 MS. TEMPLE: Objection. Vague.

23 THE WITNESS: I have no opinion on that  
24 question.

25 Q BY MS. SPALETTA: Does it make sense to you?

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1 A I have no opinion on that question.

2 Q The second source of supply that Mr. Coats  
3 described was a return flow supply. Do you understand  
4 what I'm talking about?

5 A Yes.

6 Q Is the return flow supply included in the blue  
7 line depicted on Exhibit 13?

8 A No.

9 Q Why not?

10 A Because that is not the line that is on the  
11 graph.

12 Q So the line on the graph is purely the full  
13 natural flow from the four stations obtained from the  
14 DWR?

15 A Correct.

16 Q So going back now to this zero value on  
17 September 21st, row 357. The day before the value is  
18 255 and the day after the value is 278. So as an  
19 engineer, does that make sense there would be a zero  
20 value in between?

21 A Does it make sense that there is a negative  
22 value in between -- no. I take the data as it is  
23 provided to me.

24 Q So if you were to make an adjustment based on  
25 what would make sense to you, as a civil engineer, what

1 would you put in that row?

2 A Personally, I would have left it as a  
3 negative.

4 Q Why?

5 A Because as a data analyst, you shouldn't  
6 really --

7 Q Go ahead.

8 A Because in the summation, it is what it is.  
9 And it is possible to have a negative value there.  
10 But I think in the long run it really doesn't make  
11 any difference.

12 Q You said it doesn't make any difference. Going  
13 back to our chart and looking at what is Exhibit 13, the  
14 September 21st, right? Go back to our chart. What  
15 happens to the blue line on September 21st? Does it  
16 dip?

17 MS. TEMPLE: Is there a question pending?

18 Q BY MS. SPALETTA: Yeah, I asked a question, if  
19 putting the zero value there on September 21st caused  
20 the line, the blue line on the graph, to dip on that  
21 date?

22 A Minimally, at best.

23 Q Okay. Now you've explained to us the source of  
24 the information for the blue line that is labeled "daily  
25 full natural flow" in the chart. Let's talk about the

1 other supply that is depicted in the chart, which was  
2 the dashed blue line with the label "2014 actual monthly  
3 FNFs." What does that represent?

4 A Those are just the monthly full natural flows  
5 from 2014, so we have an idea of what it looked like  
6 last year. Just so we had some idea what happened  
7 last year, just so we have an idea of what we could  
8 expect, or hope to expect, for this year as we are  
9 looking at rescinding the notices of water  
10 unavailability.

11 Q Why did you look at monthly values there when  
12 you used daily values for the other months?

13 A That's how the data is provided after the  
14 previous year's data is provided on a monthly basis  
15 in acre feet.

16 Q And then you converted the acre feet to data?

17 A Yes.

18 Q Where is that in your data?

19 A Probably in my calculator but it would be --  
20 if you go to the "chart data," scroll to the right a  
21 little bit.

22 Q Do you need to scroll down?

23 A Nope. It is up at the top.

24 Q Is it in column MNN, rows 8 and 9?

25 A Right.

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1 Q And you part entered those numbers?

2 A Yeah. Yes.

3 Q So you pulled the information off the website  
4 from last year, converted it to a monthly number using  
5 your calculator, and then entered it in the cell in the  
6 spreadsheet?

7 A Correct.

8 Q So before we leave this spreadsheet, let's go  
9 back to our "demand summary" tab. I'm just going to  
10 request that we get that sheet printed in its entirety.  
11 And we will --

12 MR. YOUNG: Do you want me to do it right now?

13 MS. SPALETTA: Let's go off the record.

14 (Whereupon, discussion held off record.)

15 MS. SPALETTA: Back on the record.

16 We are confirming that we are printing the  
17 complete "demand summary" tab spreadsheet from the  
18 "sacprorated.xlsx" Excel workbook that was on the State  
19 Water Resources Control Board's website, underneath the  
20 "Sacramento River With Prorated Delta Demand" updated  
21 November 2nd, 2015. And that will be marked as a  
22 replacement Exhibit 27.

23 Q Now we are going to travel back in time to see  
24 what prior versions of this spreadsheet looked like.  
25 Now, we were not able to locate prior versions of this

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1 spreadsheet on the State Board's website because we  
2 believe it has been overwritten on the website.

3 Is that your understanding as well, Mr. Yeazell?

4 A Yes.

5 Q So in the Public Records Act request, we do have  
6 a file that contains Water Availability documents  
7 related to the June 1st -- excuse me -- June 12th  
8 curtailment. First open that up.

9 We are going into the Water Availability file.  
10 Then we are going into the next file that is "20150612\_  
11 notice." And there are several spreadsheets in this  
12 file.

13 Can you identify for us the spreadsheet that  
14 would be the companion combined Sacramento/San Joaquin  
15 Watershed and Delta spreadsheet used to support the  
16 curtailment on June 12th?

17 A I created several spreadsheets to analyze  
18 several different scenarios. Which ones were actually  
19 used in the decision process, I'm not too sure of.

20 Q Well, I see one here that is labeled -- I see a  
21 file labeled "20150610 Sacramento Plus Proportional  
22 Delta Pre-14 Supply Demand Analysis Web 2015-06-10." Do  
23 you think that could potentially be the spreadsheet that  
24 was posted to the website?

25 A That is actually a PDF document.

1 Q Okay. So there is a spreadsheet document  
2 entitled, "20150610 sacprorated.xlsx." That has the  
3 same file name, but a different date than what we were  
4 looking at before. Does that look correct?

5 A Without opening and looking at the  
6 contents -- but that looks possible.

7 Q Let's open it. We've opened it and we are  
8 looking at the chart path of this spreadsheet entitled  
9 "20150610\_sacprorated."

10 Do you recognize this chart?

11 A Yes.

12 Q Does this look like the chart that you prepared  
13 in advance of the June 12th curtailment?

14 A It is possible. I prepared so many different  
15 charts that they all start to look the same after  
16 awhile.

17 MS. SPALETTA: Mr. Tauriainen, do you have  
18 any ability to narrow it down here, so we can make  
19 sure we are looking at the right one?

20 MR. TAURIAINEN: Based on the date that the file  
21 was saved, if you go back, it looks like it was created  
22 and saved on June 10th, 2015. So based on that, I would  
23 assume that that file was made on June 10th.

24 Q BY MS. SPALETTA: Okay. So then we are going to  
25 go with it. We'll take a leap of faith.



1 All right. We have the chart in front of us.  
2 This chart looks a little bit different than the charts  
3 that we have been looking at already.

4 Let's go ahead and print this chart so we can  
5 mark it as the next exhibit. Do we already have it?  
6 Okay. We are going to mark this chart as our next  
7 exhibit in order, which will be 28.

8 (Whereupon, Exhibit No. 28 was  
9 marked for identification.)

10 Q BY MS. SPALETTA: Using the information you  
11 already provided in your deposition, we have riparian  
12 demand and pre-1914 demand depicted on this chart,  
13 correct?

14 A Correct.

15 Q And you should be able to go to the "demand  
16 summary" tab to look at the numbers associated with  
17 those blocks on the chart?

18 A Correct.

19 Q So let's go to the "senior demand summary" tab.  
20 So, for example, in taking June, we have a set of tables  
21 here. There are three different tables. Can you  
22 describe for us what each table includes?

23 A The "riparian and riparian plus pre-14"  
24 includes the riparian demands from the Sacramento  
25 and the Delta. The Delta demands are adjusted by

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1 the full natural flow ratio as before. "Pre-14  
2 only" are just demands for the Sacramento and the  
3 Delta that are pre-14 only diversions. And then the  
4 "pre-14A; 1902 pre-14 demand" is the pre-14 only  
5 demand for the priority date of 1902.

6 Q When we look at this same tab in this  
7 spreadsheet from August -- or actually it is October --  
8 it had another row for a return flow adjustment of  
9 60-percent return flow adjustment.

10 Do you recall that?

11 A Yes.

12 Q That row is not in this "senior demand" summary,  
13 correct?

14 A Correct.

15 Q Why not?

16 A Because it is in the "full natural flow  
17 adjustments" tab.

18 Q So why is it in a different place here?

19 A Because on this chart, the full natural flow  
20 adjustments were done on the full natural flow  
21 forecast values, which were not on the previous  
22 charts. So we moved that adjustment from the supply  
23 to the demand.

24 Q What effect does that have on the analysis?

25 A Nothing.

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1 Q Who told you to do that?

2 A It was just a discussion between Brian and I  
3 because we knew we had to make some -- that  
4 adjustment had to be accounted for somewhere so --

5 Q Other than that difference, are there any other  
6 differences in the June demand data?

7 A It is possible there are some small  
8 differences in the demands just because one table is  
9 older than the other. And as I repeat -- stated  
10 before, more additional information becomes  
11 available to us, then we want to adjust the demands  
12 to make sure those are accounted for.

13 Q And I can see a difference right away. So, for  
14 example, in cell E 5 for the June Sacramento demand, we  
15 have a number of 56,102 in the June 10th version of the  
16 spreadsheet. The more recent version of the spreadsheet  
17 for June had a value of 62,858. So there is a  
18 difference of 7,000 acre feet or so.

19 Am I understanding you correctly that difference  
20 is the result of changes that were made to the WRUDS  
21 file?

22 A It could be more than that. I'd have to sit  
23 down and review both spreadsheets to answer that.

24 Q Is there some kind of a log that would account  
25 for all of the changes to the demand numbers that were

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1 made between June 10th and the present?

2 A If there was, it would be on the "change  
3 log."

4 Q And where is the "change log"?

5 A It is in the WRUDS database.

6 Q We have two versions of the WRUDS database that  
7 were on the State Board website. One of them was dated  
8 April -- excuse me -- dated April 8th and the other one  
9 was dated June 15th.

10 Could there be another version of the WRUDS  
11 database that has been updated since June 15th?

12 A That would be the one that we were just looking  
13 at, I believe. The latest version I'm aware of is the  
14 June 15th.

15 Q Okay. So that is this big 41.53 megabyte file?

16 A Correct.

17 Q I think we downloaded it, so let's open it up.  
18 So we have now opened up the "info\_order\_demand.xlsx"  
19 spreadsheet from the State Water Resources Control Board  
20 website, which indicates it is a 41.53 megabyte file  
21 updated on June 15, 2015.

22 We are looking for the "change log," so we'll go  
23 to that tab. And we have opened up the "change log"  
24 tab. What does this "change log" show us, Mr. Yeazell?

25 A I'm reading it.

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1 Q Okay.

2 A It shows the changes made to the WRUDS tab.  
3 Mostly just removing some demands, adjusting some  
4 demands. You can see some from MBK. We removed some  
5 applications that have been revoked, statements that  
6 have been inactivated.

7 Q So let's start with the first one which is on  
8 row 8 with a date of May 15th. It says, "Distributed  
9 Oakdale Irrigation District, pre-1914 diversion reported  
10 in Information Order into adjudicated priority dates."

11 Where did you get the information to make that  
12 change?

13 A From the adjudication.

14 Q And is that part of the Public Records Act  
15 request documents that you provided?

16 A I don't know.

17 Q So where are the actual changes? How would we  
18 find those?

19 A If you go to the "WRUDS" tab, search for  
20 "Oakdale Irrigation District." Just filter it on  
21 "primary owner."

22 Q And then what do we do?

23 A If you look at the bottom, you see -- it came  
24 back up to the statement numbers. If you look at  
25 the bottom, you see one, two, three, four, five --

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1 Oakdale Irrigation District with the same statement  
2 number.

3 Basically they had different adjudicated  
4 amounts with different priority years. So I took  
5 that and distributed what they reported, and  
6 allocated it to their different adjudicated rights  
7 in priority.

8 Q And who told you to do that?

9 A Brian Coats, my supervisor.

10 Q Did you have any discussions with anybody else  
11 about that?

12 A No.

13 Q With respect to these particular rights for  
14 Oakdale Irrigation District, was there any effort to  
15 determine if those rights were being satisfied through  
16 stored water?

17 A Not to my -- no, I don't know.

18 Q Was there any discussion about that?

19 A No.

20 Q Was there any reduction made to Oakdale  
21 Irrigation District's demand numbers to account for  
22 stored water deliveries?

23 A Not that I'm aware of.

24 Q Let's go back then to the "change log." We have  
25 row 11 on June 12th. It says you updated statement 480

1 and statement 925, May through December, 2015 forecasted  
2 diversions, per MBK, April 24th, 2015 email.

3 Can you explain that change, please?

4 A I can't remember it off the top of my head.

5 Q So if you go to the "WRUDS" database and we look  
6 up 480 and 925, would that give us the information?

7 A I don't know.

8 Q Let's try it. So statement 480, according to  
9 this "WRUDS" tab, it has a primary owner of Joint Water  
10 Districts Board. Do you know where they are located?

11 A Nope.

12 Q And if you scroll over where we see the change  
13 that was made --

14 A I don't know. Let's find out.

15 Q So as we are scrolling, we see that there is no  
16 data for 2010 through 2013. Do you know why that is?

17 A That is because it was an Informational Order  
18 demand, and that demand got replaced by the 2013 --  
19 the 2010/2013 demand.

20 Q Do you mean the opposite? Do you mean that the  
21 2010 through 2013 demand was replaced with what was  
22 reported on the Information Order?

23 A Yes.

24 Q All right. So we have scrolled over to the  
25 notes, and it says "May through December, 2015

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1 forecasted diversions per MBK, April 24th, 2015 email."

2 Does that refresh your memory?

3 A It is apparent that I made some sort of  
4 change. If anything, it was to reduce the demand.  
5 That is all I can glean from that right now.

6 Q Do you think that that was basically to reduce  
7 the demand, based on information that was provided by  
8 MBK Engineers?

9 A That is what it says, so I would say yes.

10 Q Do you know if the purpose here was to reduce  
11 the demand to account for the delivery of stored water?

12 A I don't know that.

13 Q I'm going to ask you a more general question  
14 about accounting for the delivery of stored water. Did  
15 you make any adjustments to the demand numbers in these  
16 spreadsheets to account for the delivery of stored water  
17 to people who had reported a demand under riparian and  
18 pre-1914 rights?

19 A No.

20 Q Did you ever talk about that with anyone?

21 A No.

22 Q Okay. So we have talked about the fact that you  
23 believe that you probably made a reduction. But when we  
24 go back to the June demand from the "demand summary" --  
25 so on June 10th, the spreadsheet had a Sacramento demand



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1 of 56,102. But today the spreadsheet, the current  
2 spreadsheet, has a higher June demand of 62,858. So if  
3 the adjustments were to reduce demand, how did the  
4 demand number get higher?

5 A I can't answer that without sitting down with  
6 both spreadsheets and looking at them more closely.

7 Q All right. Now I just want to confirm this. I  
8 think you testified to this already but the "change log"  
9 for the WRUDS database, the one we have on the website  
10 says it is dated June 15th, 2015.

11 Is it your testimony that there were not any  
12 other changes to the WRUDS database after June 15, 2015?

13 A I would have to look at the other  
14 spreadsheets to answer that.

15 Q So what else would we need to look at?

16 A The previous spreadsheet.

17 Q The one from the website? What is the name of  
18 it?

19 A Which is that date? Is that the 6/16?

20 Q Yes.

21 A That should be the final spreadsheet, the  
22 April, May and June notices were derived from.

23 Q Now the State Board has recently made decisions  
24 about lifting curtailments based upon your updated  
25 spreadsheet chart that we just reviewed.

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1 A Correct.

2 Q So, were there any changes made to demand for  
3 the purposes of that updated spreadsheet to aid in the  
4 decision of when to lift the curtailments?

5 A I don't believe so.

6 MS. SPALETTA: We are going to take a  
7 five-minute break at this point.

8 (Whereupon, a recess was then taken.)

9 MS. SPALETTA: Back on the record.

10 So we had just finished talking about the  
11 "20150610 sacprorated" spreadsheet. And during the  
12 break, we have printed two things from this spreadsheet.  
13 We have printed the chart, which we've marked as  
14 Exhibit 28. And we have printed the "Senior demand  
15 summary" which we will mark as Exhibit 29 when they get  
16 off the printer.

17 Q BY MS. SPALETTA: What I would like to do now is  
18 try to locate your similar spreadsheets for the  
19 "sacprorated" that would have been done at the time of  
20 the May 1st curtailment.

21 So as you sit here right now, do you know where  
22 I would go to find that?

23 A No.

24 Q Okay. So I'm going to look in the "Water  
25 Availability" folder from the Public Records Act request

1 production. Then I'm going to open up the 2015 file.  
2 And previously we noticed that there were subfiles  
3 relating to the date of each curtailment notice.

4 So now I'm going to look at the subfile entitled  
5 "20150501\_notice." So we have opened up the subfile  
6 associated with the May 1st, 2015 notice. There are  
7 several files in here, both PDFs and Excel spreadsheets.

8 I'm going to make the file names complete. Can  
9 you see a spreadsheet related to the Sacramento Basin  
10 analysis?

11 A "Sacramento Basin Charts With WRUDS 2015-05-01."

12 Q Let's open that one. Let's look at the chart  
13 associated with this spreadsheet entitled, "Sacramento  
14 Basin Charts With WRUDS 2015-05-01."

15 It looks like there are actually two different  
16 charts in this spreadsheet. One is entitled "prorated  
17 chart" and the other one is entitled "Sac w N. Delta  
18 chart."

19 Do you see that?

20 A Yes.

21 Q So to try and make as much as an  
22 apples-to-apples comparison with the prior spreadsheets  
23 we have been looking at today, which of these two charts  
24 should we look at?

25 A They both look at two different scenarios.

1 Can you switch to the other one?

2 Q Now we are opening the chart entitled, "Sac w N.  
3 Delta chart."

4 A Apples to apples, I would say the prorated  
5 demand with the return flow.

6 Q Big picture, what is the difference between  
7 these two charts?

8 A One looks at the prorated Delta demand where  
9 we had the proportional FNF adjustment. And the  
10 other one only takes the entire -- includes the  
11 entire demand from the North Delta.

12 Q Does it also include a different subset of the  
13 Delta demand? Does it only include the North Delta  
14 demand?

15 A The North Delta only includes the North  
16 Delta. The prorated includes the entire Delta but  
17 at the prorated full natural flow adjustment  
18 percentages.

19 Q If I'm understanding you correctly, there are  
20 actually demand differences and supply differences  
21 between the two charts?

22 A Yes.

23 MS. SPALETTA: So let's look at the prorated  
24 chart. We are going to go ahead and print this and  
25 mark it as Exhibit 30.

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1           Exhibit 30 will be the prorated chart from  
2 the spreadsheet dated May 1st, 2015, "sacprorated."

3                               (Whereupon, Exhibit No. 30 was  
4                               marked for identification.)

5       Q       BY MS. SPALETTA: Okay. We are looking now at  
6 this chart and it looks like it includes a lot of the  
7 same type of data that we've seen on the other charts.  
8 The difference appears to be the addition of the 50-year  
9 average full natural flow and the Water Year 2010 full  
10 natural flow; is that correct?

11       A       Correct.

12       Q       Are there any other differences besides the  
13 values?

14       A       I don't think we saw the full natural flow  
15 forecast ones yet on previous graphs.

16       Q       Didn't we have those in the June 10th graph?

17       A       I don't remember.

18       Q       So to go ahead and do a comparison, we marked as  
19 Exhibit 28 the graph from the June 10th spreadsheet.

20       A       Yes.

21       Q       And we are now looking on the screen at what is  
22 marked as Exhibit 30, which is the graph from the  
23 May 1st spreadsheet.

24               MS. SPALETTA: Let's go off the record.

25                               (Whereupon, discussion held off the record.)

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1 MS. SPALETTA: Back on the record.

2 We took a quick break to sort out what we had  
3 printed from these various spreadsheets. We marked as  
4 Exhibit 28 the chart from the June 10th spreadsheet and  
5 Exhibit 29, the "demand summary" from the June 10th  
6 spreadsheet. We also marked as Exhibit 30 the prorated  
7 chart from the May 1st spreadsheet.

8 Do we have a stipulation of the parties that  
9 those are accurate?

10 MS. TEMPLE: I'll let the witness confirm.

11 THE WITNESS: Yes.

12 (Whereupon, Exhibit 29 was  
13 marked for identification.)

14 Q BY MS. SPALETTA: Okay. So what we were trying  
15 to do was look at the difference between your May 1st  
16 spreadsheet and the prior ones.

17 So in the May 1st spreadsheet, you were just  
18 telling me two of the differences were the inclusion of  
19 the 50-year average full natural flow and the Water Year  
20 2010 full natural flow, correct?

21 A Correct.

22 Q Any other differences?

23 A No.

24 Q So then if we go to the "demand summary" that is  
25 associated with this "prorated chart," where would that

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1 be?

2 A "Prorated demand," I believe.

3 Q This "prorated demand" chart associated with the  
4 May 1st, 2015 Sacramento Basin chart spreadsheet has a  
5 June Sacramento riparian demand of 57,476 in cell E 4;  
6 is that right?

7 A Yes.

8 Q Is that the same or different than the  
9 Sacramento riparian demand was in our June 10th "demand  
10 summary," which you have in front of you as Exhibit 29?

11 A It is close.

12 Q And then the total riparian demand in June on  
13 your May 1st spreadsheet is 97,392; is that right?

14 A Yes.

15 Q And how does that compare to the total riparian  
16 demand on your June 10th "demand summary" which we  
17 marked as Exhibit 29?

18 A It is bigger -- I mean, smaller.

19 Q By about half?

20 A Yes.

21 Q What represents that difference?

22 A I couldn't tell you without looking at both  
23 spreadsheets side by side.

24 Q Go ahead and compare them.

25 MS. TEMPLE: Take your time.

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1 THE WITNESS: No, I'd have to get into both  
2 spreadsheets and look at them.

3 Q BY MS. SPALETTA: One of the numbers that looks  
4 very different is the Delta riparian number. On the  
5 May 1st version that we have on the screen, it shows a  
6 Delta riparian demand of 51,152. And on the June 10th  
7 version, which is Exhibit 29, it is 178,460.

8 A Yeah, I can't answer that without sitting  
9 down and look through both spreadsheets.

10 MS. TEMPLE: Could we take just a second?

11 MS. SPALETTA: We'll take a break off the  
12 record.

13 (Whereupon, discussion held off the record.)

14 MS. SPALETTA: We are back on the record.

15 Q We were trying to explain the difference between  
16 the total riparian demand numbers between May 1st and  
17 the June 10th versions. Were you able to --

18 A I can't answer that without sitting down with  
19 both spreadsheets and comparing them cell by cell and  
20 just retracing my steps.

21 Q Do you remember a conversation with Mr. Coats or  
22 Mr. O'Hagan where you were instructed to go back and  
23 treat the riparian pre-1914 dual claimants differently  
24 for purposes of the Sacramento spreadsheet?

25 A The only difference I recall is for the



1 diverters under the Informational Order in the  
2 Delta, if they had both riparian and pre-14 demands,  
3 to combine them and treat those as riparian demands.  
4 Other than that, for anyone outside of the  
5 Informational Order, no different treatment.

6 Q So I did notice a difference in just the  
7 headings of these tables. Like you'll see here on the  
8 May 1st version the heading is just "riparian." But on  
9 the June 10th version, the heading is "riparian and  
10 pre-1914" -- excuse me. "Riparian and riparian plus  
11 pre-1914."

12 Does that help jog your memory at all?

13 A I thought I answered the question.

14 Q Okay. So at some point, though, along the way  
15 in these spreadsheets, did you get an instruction to go  
16 back and change it and do it differently than you had  
17 originally done it?

18 A No, not that I remember.

19 Q Now for the supply side of this spreadsheet, is  
20 there anything different about the methodology than what  
21 you already described to me in the June 10th version, as  
22 far as the full natural flow?

23 A As far as the daily full natural flow?

24 Q Yes.

25 A No.

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1 Q What about as far as the projected or forecasted  
2 full natural flow?

3 A Yeah, also should be the same.

4 Q And again, what does the forecasted full natural  
5 flow include in this chart? Go back to the chart.

6 A Go to the prorated -- can you scroll to the  
7 beginning? Can you scroll all the way to the end so  
8 I can see all the tabs?

9 Can you click on one of the forecast lines?  
10 "Prorated chart data" tab. Can you select that tab?  
11 Select the cell in the 50 percent FNF. Yeah, one of  
12 those.

13 Scroll to the right on the spreadsheet. Each  
14 one of these is a little different. Are we at the  
15 very top? More to the right. Can you scroll to the  
16 very top, all the way to the top? So after 12 comes  
17 13. And then scroll to the right. There we go.

18 Q So we are looking at the "prorated chart data"  
19 and we are in columns Z through AF, row 12 through 24.  
20 And there is a chart entitled, "Adjusted full natural  
21 flow and CFS." Is this the data that is plotted on the  
22 prorated chart?

23 A That is the data.

24 Q And where did the numbers that were in this  
25 chart come from?

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1 A This was one of the earlier spreadsheets.  
2 I'd have to retrace my steps. I created this  
3 spreadsheet before I did a lot of the  
4 standardizations, so I have to look at how  
5 everything was formed. So once again, I'd have to  
6 go back and look through the spreadsheet.

7 Q We might be able to help you out by looking at  
8 the notations that are on the chart that we printed as  
9 Exhibit 30.

10 A Yeah, that is just --

11 MS. TEMPLE: That is 29 and this is 30. I think  
12 she means this (indicating.)

13 THE WITNESS: Yeah, it is there. It is  
14 calculated somewhere and I copied it. All I can say is  
15 that this was one of the spreadsheets that was done  
16 before I had a standardized foresight to keep everything  
17 more tidy -- but it is easily recreatable. I mean, you  
18 just have to follow the recipe that is there and --

19 Q BY MS. SPALETTA: So it looks like the projected  
20 full natural flow -- excuse me. The title you gave it  
21 is "Full Natural Flow Forecast"?

22 A Yes.

23 Q On the chart, it includes DWR's April 2015 full  
24 natural flow forecast for the four stations, correct?

25 A Yes.

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1 Q As well as the full natural flow of the minor  
2 streams from DWR's May 2007 and for unimpaired flow data  
3 reports?

4 A Yes.

5 Q Anything else?

6 A No.

7 Q So no return flow numbers?

8 A As far as I can tell, no, but --

9 Q But those were --

10 MS. TEMPLE: He wasn't quite finished.

11 Q BY MS. SPALETTA: Go ahead. I'm sorry.

12 A I'd have to go back and look at the data and  
13 verify it and see -- I would have to look at the  
14 spreadsheet to confirm that.

15 Q But we did confirm previously today that the  
16 return flow numbers were added as part of the full  
17 natural flow forecast on the June 10th charts?

18 A Correct.

19 Q But as you sit here today, you are not able to  
20 confirm one way or the other whether they were part of  
21 the full natural flow forecast on the May 1st chart?

22 A Correct.

23 Q Do you recall any discussions about adding the  
24 return flow information?

25 A For this particular draft?

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1 Q For any drafts.

2 A Yes. At one point, that I should do it.

3 Q So it was a decision to add something new that  
4 you had not done in prior versions?

5 MS. TEMPLE: Objection. Vague and ambiguous.

6 THE WITNESS: I don't recall.

7 Q BY MS. SPALETTA: I guess what I'm getting at is  
8 you didn't always have the return flow factor in your  
9 spreadsheets from the beginning. It was a decision that  
10 was made as you went to include it?

11 A Yes. But when, I don't recall.

12 Q That leads me to another question that I have  
13 that I keep meaning to ask you. When you created this  
14 spreadsheet, did you start from scratch?

15 MS. TEMPLE: Objection. Vague and ambiguous.

16 THE WITNESS: I used what was done last year as  
17 a guiding point. But as far as the spreadsheet, yes, it  
18 was created from scratch.

19 Q BY MS. SPALETTA: When you say you used what was  
20 done last year, who set up this spreadsheet that was  
21 used last year?

22 A That I don't recall.

23 Q It wasn't you?

24 A It wasn't me.

25 Q And where would I find the spreadsheet that was

1 used last year which was 2014?

2 A I don't recall.

3 Q I'm going to ask you a couple more general  
4 questions while we are waiting for printouts. You said  
5 in your work history that you'd spent a lot of time on  
6 groundwater work.

7 A Yes.

8 Q Did you give any thought to whether you should  
9 address the interplay of surface water and groundwater  
10 for the purpose of this analysis?

11 A No.

12 Q Why not?

13 A My role in this was to develop the analysis  
14 based on the parameters provided to me by my  
15 supervisor, Brian Coats.

16 Q Did you have any discussions with including flow  
17 that comes into the Delta from the west through the Bay?

18 A No.

19 Q Do you have an opinion about it?

20 A No.

21 Q We've talked about both monthly and daily full  
22 natural flow calculations that you obtained from DWR.  
23 Do you understand what the difference is between them,  
24 other than the time step?

25 MS. TEMPLE: Objection. Vague and ambiguous.

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1 Q BY MS. SPALETTA: Do you know what I mean when I  
2 say "time step"?

3 A Yes.

4 Q Once daily, once monthly?

5 A I know daily -- one is accumulated over the  
6 month and one is by the day.

7 Q Other than that difference, do you understand  
8 there to be any other difference between those two full  
9 natural flow numbers from DWR?

10 A If there are -- there could be. I don't  
11 know.

12 Q And in these graphs, we've seen different  
13 exceedance forecasts, the 50 to 90 and the 99. Where do  
14 those exceedance forecasts come from?

15 A The Department of Water Resources Bulletin  
16 120 and the water supply indexes. They are also  
17 available online.

18 Q They come from DWR?

19 A Yes.

20 Q It wasn't a decision that you made?

21 A No.

22 Q Okay. So now we have talked about three  
23 different spreadsheets. We have talked about the one  
24 that is currently on the website. We talked about the  
25 June 10th spreadsheet, and we've talked about the

1 May 1st spreadsheet.

2 Now, there was the initial curtailment which was  
3 April 23rd. Do you know which spreadsheet was used for  
4 that curtailment decision?

5 A Not off the top of my head, no.

6 Q So let's go back to our Water Availability file  
7 from the Public Records Act request. Open up the Water  
8 Availability file and the 2015 subfolder. And then  
9 there is a subfolder that is entitled "20150423\_notice."  
10 Open that up.

11 Do you see the Excel spreadsheet in here that  
12 was used to support the April 23rd curtailment?

13 A Can you scroll down? Are there more files?  
14 There are only two Excel spreadsheets in there. The  
15 "20150406, Sac/SJ Basin with Proportional Delta  
16 Demand."

17 Q Open up that one.

18 A Okay.

19 (Whereupon, Exhibit No. 31  
20 was marked for identification.

21 MS. SPALETTA: Before we get into this April 6th  
22 spreadsheet, I'm going to pass around what we've marked  
23 as Exhibit 31, which was the "demand summary" from the  
24 May 1st worksheet.

25 Q Before we go on, Mr. Yeazell, I want to make



1 sure we have in front of us, for comparative purposes,  
2 the demand summaries that we already looked at.

3 So we have Exhibit 27, which is the "demand  
4 summary" from the August 28th spreadsheet, correct?

5 A Correct.

6 Q Then we have Exhibit 31, which is the "demand  
7 summary" from the May 1st, 2015 spreadsheet?

8 A Correct.

9 Q Then we have Exhibit 29, which is the "demand  
10 summary" from the June 10th, 2015 spreadsheet, correct?

11 A Correct.

12 Q And all three of those were from the "Sacramento  
13 and Delta Prorated Basin Analysis"?

14 A Correct.

15 Q Now we are turning our attention to a new  
16 worksheet, Excel file, entitled "20150406\_Sac-SJ Basin  
17 With Proportional Delta Demand" that was produced as  
18 part of the Public Records Act request. We've opened  
19 the tab entitled "supply and demand chart."

20 Do you recognize this chart?

21 A It looks familiar. It has been awhile.

22 Q Is this a chart that you prepared in advance of  
23 the April 23rd curtailment?

24 A I prepared it. I don't remember exactly for  
25 what purpose.

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1 MS. TEMPLE: Are you marking this for the  
2 record?

3 MS. SPALETTA: Yes. We are going to go ahead  
4 and mark it for the record as Exhibit 32.

5 (Whereupon, Exhibit No. 32 was  
6 marked for identification.)

7 Q BY MS. SPALETTA: This chart looks a little bit  
8 different than the ones we have looked at today. Is the  
9 first difference the geographic scope analysis?

10 A Yes.

11 Q Can you explain that difference?

12 A It just includes the entire San Joaquin and  
13 Sacramento River Basin Watersheds.

14 Q So the "demand data" that is illustrated on this  
15 chart, does it come from WRUDS in the same fashion as  
16 how we described earlier today in your deposition?

17 MS. TEMPLE: Objection. Vague and ambiguous.

18 THE WITNESS: I don't recall.

19 Q BY MS. SPALETTA: Where would we need to look to  
20 verify that?

21 A "2010-2013 demand."

22 Q We have opened up that tab. We are scrolling  
23 over. It appears to have been populated with the  
24 reported information for 2010 through 2013; is that  
25 right?

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1 A Yes.

2 Q Now this chart also has the purple demand  
3 columns starting with column EV.

4 A So this is a version of the demand data set  
5 before I started calling it WRUDS. That was current  
6 at the time of the April -- was it April -- the  
7 post-14 curtailments.

8 Q This spreadsheet is dated April 6th, 2015. Is  
9 that the date that this data was current that we are  
10 looking at?

11 A I assume so.

12 Q So the purple demand columns, do they include  
13 the data from 2010 to 2013 averaged?

14 A Yes.

15 Q So previously today we talked about the  
16 Information Order reporting for actual use in 2014. Is  
17 it correct to state that those actual 2014 demands are  
18 not included in this spreadsheet?

19 A I don't recall if they are or not.

20 Q How could we check that?

21 A I'd have to go and compare the spreadsheets.

22 Q At this point in time in April of 2006, had you  
23 gone in and fixed the duplicate issue?

24 A I can't recall.

25 Q So we would have to go through each row and

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1 check to see if you'd made notes there?

2 A Yes.

3 Q What about the reasonable use issue?

4 A We'd have to look again.

5 Q All right. Let's look again at the "supply and  
6 demand chart." Now as far as the supply information on  
7 this chart, we've got a solid blue line labeled "Daily  
8 FNF." What is the source of that?

9 A Same source as the daily FNFs.

10 Q But the previous ones were just for the  
11 Sacramento Basin. Is this more expansive?

12 A It also includes those in the San Joaquin.

13 Q And where would we find that information?

14 A On the CDEC supply tables spreadsheet.

15 Q That is the one that we pulled up from the Water  
16 Availability file?

17 A Yes.

18 Q That was produced as part of the Public Records  
19 Act request?

20 A Correct.

21 Q Then we also have the forecasted FNF. What is  
22 included in the forecasted FNF on this chart from  
23 April 6th?

24 A At a minimum, the forecasted FNFs provided by  
25 the Department of Water Resources from Bulletin 120

1 and the water supply index papers.

2 Q Now in the prior charts we looked at, we had a  
3 "demand summary." Is there something similar in this  
4 Excel workbook?

5 A I don't see one.

6 Q Let's look at the "senior demand" chart. We  
7 have pulled up the "senior demand" tab. What is  
8 reflected on this sheet?

9 A Can you scroll to the top? That is the  
10 riparian and pre-14 demand by watershed.

11 Q So is that a summation from the WRUDS? It is  
12 not called WRUDS in this spreadsheet, but from the first  
13 tab that is called "2010 - 2013 Demand"?

14 A Correct.

15 Q So which of the numbers in this chart were then  
16 used to populate the graphic under the chart tab?

17 A So that grand total would represent -- you go  
18 to the supply demand chart. It represents the --  
19 oh, I didn't filter it out. So if you go to the  
20 "chart data" tab, on top you see the riparian demand  
21 and the pre-14 demand. Those have gotten --

22 Q -- sourced?

23 A Sourced from the "senior demand" tab by -- it  
24 is just the way that the filter was that had all the  
25 riparians. The way the filter was set on the

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1 "senior demand" as it is had all the riparian and  
2 the pre-14 demand in it. But you just filter it  
3 using the filters to pull out the riparian and the  
4 pre-14 demand. And you can populate it up into the  
5 rows up top.

6 MS. SPALETTA: I think Mr. O'Laughlin has  
7 some questions about your chart.

8 MR. O'LAUGHLIN: Can you go back to the "senior  
9 demand" chart real quick? No, the "senior demand"  
10 chart, please.

11 I'm perplexed. On the Stanislaus River, it says  
12 on line 30 that the demand for May is 61,000. Do you  
13 have any understanding why the demand would drop  
14 dramatically in June, July and August when irrigation  
15 demands would be going up?

16 THE WITNESS: I just look at the numbers. I'm  
17 not looking for causation.

18 MR. O'LAUGHLIN: Okay. So that would be the  
19 same on the Tuolumne. You would have 301 in May and  
20 then all of a sudden, it drops to 103 and then 30?

21 THE WITNESS: Like I said, I just look at -- I  
22 just plot what the numbers say.

23 MR. O'LAUGHLIN: Okay. And that is coming from  
24 what, those numbers?

25 THE WITNESS: From eWRIMS.

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1 Q BY MS. SPALETTA: So, for example, on the  
2 Stanislaus River, if the eWRIMS report for Oakdale  
3 Irrigation District included the amounts that were being  
4 diverted to storage in May, would that be showing up as  
5 part of the 61,876 acre feet in May on your "senior  
6 demand" chart?

7 A Let's look at the spreadsheet.

8 Q All right. So let's scroll over and sort by --  
9 So we have sorted the "2010-2013 demand" tab to  
10 pull out just the Oakdale Irrigation District's  
11 applications and statements. And we are going to scroll  
12 over to the demand column to see which demands were used  
13 for the month of May.

14 Scroll up a bit.

15 So we see total demands for Oakdale Irrigation  
16 District of 58,906 under a statement file.

17 A Correct.

18 Q Do you know whether that 58,906 represented  
19 water that was being both directly diverted and diverted  
20 to storage?

21 A No.

22 Q So let's ask a broader question then. For all  
23 of the demand data that got included in these various  
24 spreadsheets, was there any effort made to differentiate  
25 between direct diversion and diversion to storage as

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1 reported on a pre-1914 statement of diversion?

2 A No. Only if it was a "power only."

3 MR. O'LAUGHLIN: How would you treat power in,  
4 like, M&I or power in irrigation?

5 THE WITNESS: We looked at the individual  
6 statements in eWRIMS and made -- if some of them were  
7 very clear on, you know, small, like ten acres of  
8 irrigation or maybe ten or municipal for ten people or  
9 some small number of people -- if they had something  
10 like that, that was sufficient enough for us to treat  
11 that as "power only."

12 But if there was really -- if we couldn't make  
13 that kind of judgement call, we had to treat it as a  
14 "power only" treatment because there is not enough  
15 information to differentiate or make that call.

16 MR. O'LAUGHLIN: Thanks.

17 Q BY MS. SPALETTA: So you just described a  
18 process where you actually pulled up the statements and  
19 read the recorded information. Did you only do that for  
20 the statements that were associated with power?

21 A Yes.

22 Q Was there any effort to pull up the statements  
23 that were associated with simply large diversions?

24 MS. TEMPLE: Objection. Vague and ambiguous.

25 THE WITNESS: No.



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1 Q BY MS. SPALETTA: So in the prior spreadsheets  
2 we looked at, there was a proration of Delta demand.  
3 Was that done in this spreadsheet?

4 A I don't recall. This was an early one of the  
5 first spreadsheets created.

6 Q Well, it says in the title, "Sac/San Joaquin  
7 Basin With Proportional Delta Demand." So what did that  
8 mean?

9 A It makes no sense to proportion the Delta  
10 demand when it seemed higher -- the "Sacramento/San  
11 Joaquin Basin," that is probably just a misnamed  
12 file.

13 Q Let's go ahead and go back out of this file.

14 We'll just confirm for the record that we did  
15 get Exhibit 32 marked, which was the chart from this  
16 April 6th, 2015 chart.

17 A Yes.

18 Q Now, moving on. Let's go back to the Public  
19 Records Act request, the same April 23rd file folder --  
20 sorry -- yes, the April 23rd, 2015 file folder.

21 There was a second Excel spreadsheet that  
22 contained this folder towards the bottom, so let's  
23 scroll all the way down. There it is. "San Joaquin  
24 River to Mendota Pool Supply/Demand" analysis file.  
25 Is this a graph you prepared?

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1 A It looks familiar.

2 Q What is the geographical area represented by  
3 this graph?

4 A I'll have to remember. This one was just a  
5 little exercise I was asked to do. Didn't pay too  
6 much attention to it.

7 Q Who asked you to do this exercise?

8 A It was either Brian Coats or John O'Hagan.

9 Q Do you know whether or not the results of this  
10 exercise were used to support the April 23rd  
11 curtailment?

12 A I do not know.

13 MS. SPALETTA: Let's go ahead and print this  
14 graph and then we will mark it as Exhibit 33.

15 (Whereupon, Exhibit No. 33 was  
16 marked for identification.)

17 Q BY MS. SPALETTA: Can you scroll to the top  
18 where it says "Curtailment PODs" tab? We have opened up  
19 the tab "Curtailment PODs."

20 What does this tab represent?

21 A Those were the statements that were used to  
22 create that graph.

23 Q How were they selected?

24 A Through mapping in the GIS. I just picked  
25 the area of interest and selected all of the water

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1 rights within that area, created that list, and put  
2 it in the table. And then through a VLOOKUP, I can  
3 look at what demand spreadsheets to use in the  
4 demand analysis.

5 Q Are there any other questions about this file  
6 before I move on?

7 Why don't you go ahead and look at something  
8 that is in the exhibits in front of you that we marked.  
9 Could you compare Exhibit 29 to Exhibit 31, please.

10 Exhibit 29 is the "demand summary" sheet from  
11 June 10th and Exhibit 31 is the "demand summary" sheet  
12 from May 1st.

13 What I'm looking at is the full natural flow  
14 ratio that was used in June, for example. In the  
15 June 10th version, it was 82.8. And in the May 1st  
16 version, it was 78.0. Why are they different?

17 A The May what? What was the date again?

18 Q May 1st, 2015.

19 A May 1st, those are the values from the  
20 April -- the FNF forecasts are updated on a monthly  
21 basis. The May 1st spreadsheet reflects the FNF  
22 forecasts from April because the May ones haven't  
23 been released yet. The later spreadsheet has the  
24 May and final for the water year FNF workups in it.

25 Q So for that reason, we would expect to find that

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1 the only full natural flow ratio that match between  
2 these two exhibits are the ones in March?

3 A For that particular watershed analysis, yes.

4 Q Would there have been a CDEC table file that  
5 goes along with the May 1st, 2015 worksheet? We had the  
6 supply table that went along with the one from June.

7 A Yeah. That would be the B 120, April 2015  
8 forecast.

9 MS. SPALETTA: Let's take a five-minute break.

10 (Whereupon, a recess was taken.)

11 MS. SPALETTA: We are back on the record.

12 Q We passed out during the break what we  
13 previously marked as Exhibit 33. I want to confirm that  
14 this was Exhibit 33 from the April 6th, 2015 spreadsheet  
15 for the "San Joaquin River Watershed to Mendota Pool  
16 Supply/Demand."

17 A Yes.

18 Q You testified previously that you created this  
19 spreadsheet from scratch. Did you rely on any other  
20 spreadsheets that you'd seen to use as a basis to  
21 influence how you created this spreadsheet?

22 A I had an understanding of what was done as  
23 far as the -- you know, looking at -- I had an  
24 understanding of what the graphs looked like from  
25 last year so --

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1 Q What was your role at the State Board regarding  
2 the graphs in 2014?

3 A Mostly maintaining them after they were  
4 developed. And by that, I mean just updating the  
5 full natural flows and the daily full natural flows.

6 Q And did you say that Eleanor created the graphs  
7 from 2014?

8 A No.

9 Q Who did you say created those?

10 A I did not say anyone created them.

11 Q Who created the graphs from 2014?

12 A I believe Aaron Miller. And I think Brian  
13 played a part in it as well, Brian Coats.

14 Q Was there a supporting spreadsheet for the 2014  
15 graphs?

16 A I'm sure there was.

17 Q Did you work on it?

18 A Did I? Well, yeah. There had to have been  
19 because I had to add the full natural flows to it.

20 Q Did you set up the 2014 spreadsheet?

21 A No.

22 Q So the spreadsheets, then, that you created for  
23 2015, does that represent the first time that you've  
24 ever created the surface water availability spreadsheet?

25 MS. TEMPLE: Objection. Vague and ambiguous.

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1 THE WITNESS: Yes. It is not the first time I  
2 created a spreadsheet before.

3 Q BY MS. SPALETTA: But it was the first time you  
4 created one to look at water availability?

5 A Yeah.

6 MS. SPALETTA: I don't have any further  
7 questions for you, Mr. Yeazell. Does anyone else have  
8 any questions?

9 MR. O'LAUGHLIN: Sure. I have a couple, if you  
10 don't mind.

11 MS. SPALETTA: Okay.

12 EXAMINATION BY MR. O'LAUGHLIN

13 Q BY MR. O'LAUGHLIN: My name is Tim O'Laughlin.  
14 I represent the San Joaquin Tributaries Authority. I  
15 want to follow-up on a couple of questions that I asked  
16 Mr. Coats yesterday to make sure we are talking the same  
17 language.

18 I'm going to give you a brief hypothetical.  
19 Your attorney will probably object to it as being  
20 incomplete; but if you have the ability to answer it,  
21 hopefully, we'll get an answer out of you.

22 So go back to May 1st in time and the FNFs at  
23 Goodwin. You've used Goodwin as a measuring station on  
24 the Stanislaus River for FNF, correct?

25 A Correct.

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1 Q Okay. So let's say the FNF on May 1st is 800  
2 CFS. Got that in your head?

3 A Yes.

4 Q The districts have an entitlement to 1860.6.  
5 I'll just tell you that. Okay? And they were taking  
6 all 800 CFSs on that day. Okay? Got that in your head?

7 A Yes.

8 Q Okay. Now if that is true, if there was 250 CFS  
9 going past Goodwin, how did you treat that water?

10 MS. TEMPLE: Objection. Assumes facts not in  
11 evidence. Incomplete hypothetical.

12 You may answer.

13 THE WITNESS: We did not look at it to that  
14 level of detail. Strictly -- other than the adjustments  
15 I discussed previously, we just looked at how the demand  
16 is reported by the water diverters into the eWRIMS  
17 database.

18 Q BY MR. O'LAUGHLIN: Now, you have an  
19 understanding of the difference between riparian and  
20 appropriative rights, correct?

21 A Correct.

22 Q So if the districts were taking the full natural  
23 flow on that day and Reclamation was releasing the 250  
24 CSF from stored water down the Stanislaus River -- on  
25 the Stanislaus River, if you were a riparian, would you

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1 be entitled to divert that stored water?

2 MS. TEMPLE: Objection. Assumes facts not in  
3 evidence. Incomplete hypothetical. Calls for a legal  
4 opinion.

5 THE WITNESS: I have no opinion.

6 Q BY MR. O'LAUGHLIN: Go ahead.

7 A I don't know.

8 Q You don't know?

9 A I don't know.

10 Q Do you know how that water would be treated if  
11 it got to the San Joaquin River?

12 MS. TEMPLE: Same objections.

13 THE WITNESS: Not requested for me to be of  
14 concern in the model.

15 Q BY MR. O'LAUGHLIN: How did you treat the  
16 changes in the Temporary Urgency Change Petitions filed  
17 by Reclamation in regards to the flows that would be  
18 made available February through June at Vernalis?

19 A I was not directed to address that in the  
20 model.

21 Q Were you asked to address the Temporary Urgency  
22 Change Petitions in regard to the changes in water  
23 quality for Vernalis?

24 A No.

25 MS. TEMPLE: Objection. It assumes facts not in



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1 evidence.

2 Q BY MR. O'LAUGHLIN: Go ahead. You can answer.

3 Did you answer? I'm sorry.

4 A Not directed.

5 Q Oh, okay. And finally, in regards to the  
6 Temporary Urgency Change Petitions for the April/May  
7 pulse flow for Vernalis, were you directed to change  
8 your analysis?

9 A No.

10 MS. TEMPLE: Objection. Assumes facts not in  
11 evidence.

12 THE WITNESS: No.

13 Q BY MR. O'LAUGHLIN: Thanks.

14 How did you treat in your analysis how the ag  
15 barriers operated in the Delta?

16 MS. TEMPLE: Assumes facts not in evidence.

17 THE WITNESS: I was not directed to address that  
18 in the analysis.

19 Q BY MR. O'LAUGHLIN: Did you ask to look at any  
20 particle tracking models modeling work that had been  
21 done by DWR in regards to how the ag barriers operated  
22 in the Delta?

23 MS. TEMPLE: Objection. Assumes facts not in  
24 evidence.

25 THE WITNESS: You know, I was not asked to look

1 at that.

2 Q BY MR. O'LAUGHLIN: Did you ask if you could  
3 look at that?

4 A No.

5 Q Earlier we went through these charts 29 and 31.  
6 It appears that the Delta demand for riparians and  
7 pre-14s switched between April and June. Do you have  
8 those charts in front of you, 29 and 31?

9 A Yes.

10 Q So I'm looking at chart 29. In June it has the  
11 Delta riparian and pre-14 -- riparian and pre-14 as  
12 178,000. And then it has pre-14 only for the Delta as  
13 40,000. And if you look at Exhibit 31, if you look at  
14 the Delta for riparian for June, it has 51,000. And  
15 pre-14 in Delta is now 250,000.

16 Do you see that? So here is my question.

17 MS. TEMPLE: He didn't answer you yet.

18 Q BY MR. O'LAUGHLIN: Do you see that?

19 A Yeah, I see that.

20 Q Is it your understanding, at some point in time,  
21 that Mr. Coats or Mr. O'Hagan told you to change the  
22 claimants that were pre-14 and riparians to strictly  
23 riparians?

24 A I don't recall.

25 Q When you did your analysis on your spreadsheet,

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1 did you try to quantify the number of people who claimed  
2 to be both riparians and pre-14 in the Delta?

3 A By "quantify" --

4 Q Just how many people in the Delta claim to be  
5 pre-14 and riparians.

6 A No.

7 Q If I wanted to, though, I could go into your  
8 spreadsheet because it does have it in your spreadsheet?

9 A Correct.

10 Q And I could add all those people up and figure  
11 out how many claimants, correct?

12 A Correct.

13 Q Okay. Did your shop make any attempt to try to  
14 determine what the pre-1914 water rights were of any  
15 claimants in the Delta?

16 MS. TEMPLE: Objection. Vague and ambiguous.

17 THE WITNESS: I don't know.

18 Q BY MS. SPALETTA: Did you go and look at the San  
19 Joaquin County Recorder for any filings that had been  
20 made pre-14?

21 A No.

22 Q When you got done with your analysis, did you  
23 try to quantify the water supply difference between  
24 treating people who were pre-14 riparians, and then  
25 moving them all to riparians, as to what the water

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1 quantity difference would be?

2 MS. TEMPLE: Objection. Vague and ambiguous.

3 THE WITNESS: No.

4 Q BY MR. O'LAUGHLIN: Did you have any discussions  
5 with Mr. O'Hagan as to whether or not the Delta Pool  
6 Theory would apply to the determination of changing  
7 pre-14 and riparians to strictly riparians?

8 MS. TEMPLE: Objection. Assumes facts not in  
9 evidence.

10 THE WITNESS: No.

11 Q BY MR. O'LAUGHLIN: Do you know what the Delta  
12 Pool Theory is?

13 A I have a vague knowledge of it.

14 Q Did you look to see what, if any, diversions  
15 were being made by the United States Bureau of  
16 Reclamation at the Jones Pumping Plant in May of 2015?

17 A No.

18 Q Did you do that for the Jones Pumping Plant in  
19 June of 2015?

20 A No.

21 Q Did you review the United States Bureau of  
22 Reclamation's permits for the Jones Pumping Plant to  
23 ascertain what their water source was for their facility  
24 at Jones?

25 MS. TEMPLE: Objection. Assumes facts not in

1 evidence.

2 THE WITNESS: No.

3 Q BY MR. O'LAUGHLIN: Do you know why the  
4 determination was made to start the Delta at Mossdale  
5 and not at the legal limit at Vernalis?

6 MS. TEMPLE: Objection. Calls for speculation.

7 Q BY MR. O'LAUGHLIN: If you know.

8 A My understanding is, as I was told, that is a  
9 rough demarcation of where there is no longer tidal  
10 influence to the Delta.

11 Q Were you told to ascertain what water that had  
12 been released from water quality objectives was  
13 abandoned at any source in the Sacramento/San Joaquin  
14 Bay Delta?

15 A No.

16 Q If stored water was released to meet a water  
17 quality objective, that water would not show up in your  
18 analysis; is that correct -- stored water?

19 MS. TEMPLE: Objection. Vague and ambiguous.

20 THE WITNESS: No.

21 Q BY MR. O'LAUGHLIN: No, it would not show up?

22 A It would not show up.

23 Q It would not show up. Thank you.

24 I have no further questions. Thank you very  
25 much.

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1 EXAMINATION BY MS. MORRIS

2 Q BY MS. MORRIS: I have a couple of questions  
3 just really quickly. I am Stefanie Morris, State Water  
4 Contractors. Good afternoon.

5 You spoke about some of your previous experience  
6 before you came to the State Water Board. During that  
7 time frame when you were working for other consulting  
8 companies, did you create spreadsheets, Excel  
9 spreadsheets?

10 A That's probably the simplest number analysis  
11 I've done with spreadsheets, so yes.

12 Q And you did other modeling?

13 A I did data analysis but some modeling, yes.

14 Q Would you consider the spreadsheets that we have  
15 been walking through today -- it is kind of like  
16 modeling, right?

17 A It is a model in one sense but I wouldn't  
18 consider -- it is a rudimentary model maybe.

19 Q So you have a lot of -- let me take that back.

20 You have previous experience doing other things,  
21 including creating simple spreadsheets like you created  
22 for these exercises we have been going through all  
23 today?

24 A Yes.

25 Q If I'm not getting this correct, please correct

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1 me. You weren't making decisions as to what inputs were  
2 going into the model. You were being told what  
3 inputs -- I'm sorry -- what inputs were going into the  
4 spreadsheet. That was given to you?

5 A Correct.

6 Q You didn't have any say or discretion over what  
7 was going into the spreadsheet?

8 A Correct.

9 Q You might have had opinions about how it was  
10 organized.

11 A Yes.

12 Q And how to put it together.

13 A Yes.

14 Q Right, because that is your expertise.

15 A Correct.

16 Q Thanks. A couple more quick questions.

17 You were talking about -- I forget which  
18 exhibits -- but on several of the spreadsheets there  
19 were columns that were labeled "duplicative" or "dup"  
20 and "reasonable" -- but you were looking at, sort of,  
21 checking the data. Is that a correct characterization?

22 A Correct, yeah.

23 Q We talked a lot about that today. Why was it  
24 necessary to make those adjustments?

25 A I think the biggest thing is we wanted to

1 avoid any potential obvious overreporting. One of  
2 the biggest examples is a small -- if I can give an  
3 example.

4 Q Please.

5 A There is a -- there was a domestic statement  
6 holder that had a reported diversion of somewhere,  
7 like, tens of millions of acre feet. It was  
8 obviously wrong. It turns out it was just a single  
9 household. That was probably the biggest red flag  
10 in the entire data set, and that threw everything  
11 off.

12 On further analysis, we found out that it was  
13 an older lady. She reported it wrong. We ended up  
14 striking that demand from the database. It would  
15 have thrown everything off.

16 And that was -- I personally didn't do the  
17 follow-up on that. It happened to be Eleanor, who I  
18 discussed previously. That was one of the inputs  
19 she brought. She actually contacted the person on  
20 her own and said, "this doesn't add up." So we  
21 fixed that.

22 The intent was to reduce demand, reduce the  
23 demand that was reported. And I think that is a  
24 benefit to all the diverters, ultimately.

25 Q So, in essence, you were taking the data set



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1 that you pooled from the eWRIMS on demand, right? The  
2 first data set came from eWRIMS?

3 A Correct.

4 Q So that data -- well, can you tell me what the  
5 eWRIMS data is? Where does it come from?

6 A Can you --

7 Q Let me ask the question differently. Do you  
8 know what a Statement of Diversion and Use is?

9 A Yes.

10 Q You know what that is?

11 A Yes.

12 Q The data that is in eWRIMS, is part of that  
13 coming from the water user through their Statements of  
14 Diversion and Use?

15 A That is where it is coming from, yes.

16 Q So the data set that you started with was  
17 essentially just pulled from there and is what the water  
18 users were actually reporting?

19 A Correct.

20 Q And then you went through this exercise of  
21 trying to take that data set and make it more accurate  
22 to make the demand more accurate for use in this  
23 analysis?

24 A To the best that we could, yes.

25 Q All right. Because you only -- the data that

1 you have is the data that you have. And you are stuck  
2 with using that as a first step?

3 A Right.

4 Q Okay. In order for you to do your work, would  
5 it be better if you actually had actual diversion  
6 measured data or some type of data that wasn't  
7 estimated? Would that have made this exercise easier?

8 MS. TEMPLE: Objection. Vague and ambiguous.

9 MS. SPALETTA: Objection. Relies on facts that  
10 are not in evidence.

11 MR. O'LAUGHLIN: Clearly not in evidence.

12 THE WITNESS: In a perfect world, there would be  
13 a measuring device on every point of diversion. That  
14 would --

15 Q BY MS. MORRIS: Let's assume there was a  
16 measuring device on every point of diversion. Would  
17 that have made this analysis more accurate?

18 MS. TEMPLE: Objection. Calls for speculation.

19 THE WITNESS: It could.

20 Q BY MS. MORRIS: Would it have made it easier to  
21 do this analysis?

22 A I think it would be about as -- well, as far  
23 as --

24 MS. TEMPLE: Objection. Calls for speculation.

25 Q BY MS. MORRIS: You don't have to answer it.

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1 I'm done.

2 A It would be about the same.

3 MR. VERGARA: No questions.

4 CONTINUED EXAMINATION BY MS. SPALETTA

5 Q BY MS. SPALETTA: I have one follow-up question  
6 to Ms. Morris. I asked this of Mr. Coats yesterday and  
7 I forgot to ask you.

8 The information from the statements and the  
9 reports of permittee and licensee, did you look at any  
10 of the comments that were included in the statement  
11 reports or the permittee or licensee reports?

12 MS. TEMPLE: Objection. Compound.

13 THE WITNESS: I looked at those to determine  
14 what to do with the potential duplicates, and I looked  
15 at those for "power only" to help decide how to treat  
16 "power-only" diversions.

17 Q BY MS. SPALETTA: So if a given Statement of  
18 Diversion and Use reporter had explained in the comment  
19 section of their report that they were reporting  
20 duplicatively for a particular reason, and it wasn't one  
21 that you had checked for the reasons you just described,  
22 that would have gone undetected?

23 A The spreadsheet only assumes it is a  
24 duplicate reporting if the diversions are identical.  
25 Other than that, there is no way to really know

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1 without looking at every individual statement which  
2 is -- there are tens of thousands in the database.  
3 That would be difficult to do.

4 But I did find, in looking at duplicates in  
5 the Delta, the majority of them that appeared to be  
6 duplicates stated on their statements that they  
7 divided the demand equally among however many  
8 statements they had. So if they had two statements,  
9 it was divided by two. So they are not duplicates.

10 MS. SPALETTA: I have nothing further.

11 MS. TEMPLE: Thank you. You are done.

12 (The deposition concluded at 3:43 p.m.)

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\_\_\_\_\_  
THE WITNESS

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DEPONENT'S CHANGES OR CORRECTIONS

Note: If you are adding to your testimony, print the exact words you want to add. If you are deleting from your testimony, print the exact words you want to delete. Specify with "add" or "delete" and sign this form.

DEPOSITION OF: Jeffrey Yeazell

CASE: In re: Byron-Bethany Irrigation District

DATE OF DEPO: November 13, 2015

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REPORTER'S CERTIFICATE

State of California        )  
                                  ) ss.  
County of Sacramento     )

I certify that the witness in the foregoing deposition,

JEFFREY YEAZELL,

was by me duly sworn to testify in the within-entitled cause; that said deposition was taken at the time and place therein named; that the testimony of said witness was reported by me, a duly Certified Shorthand Reporter Of the State of California authorized to administer oaths and affirmations, and said testimony was thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for either or any of the parties to said deposition, nor in any way interested in the outcome of the cause named in said deposition.

IN WITNESS WHEREOF, I have hereunto set my hand this 16th day of November 2015.

\_\_\_\_\_  
KATHRYN DAVIS  
Certified Shorthand Reporter  
Certificate No. 3808

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DISPOSITION OF ORIGINAL TRANSCRIPT

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\_\_\_\_\_ Signature waived.

\_\_\_\_\_ I certify that the witness was given the statutory allowable time within which to read and sign the deposition, and the witness failed to appear for such reading and signing.

\_\_\_\_\_ I certify that the witness has read and signed the deposition and has made any changes indicated therein.

By \_\_\_\_\_  
KATHRYN DAVIS & ASSOCIATES

--oOo--

DEPOSITION OF JEFFREY YEAZELL

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KATHRYN DAVIS & ASSOCIATES  
Certified Shorthand Reporters  
555 University Avenue, Suite 160  
Sacramento, California 95825  
(916) 567-4211

November 16, 2015

Jeffrey Yeazell  
Department OF Justice, Office of the Attorney General  
JENNIFER KALNINS TEMPLE, Attorney  
300 S. Spring Street, Suite 1702  
Los Angeles, California 90013

Re: Westside Irrigation District Cease and Desist Order  
and Byron-Bethany Irrigation District Civil Hearing

Date Taken: November 13, 2015

Dear Jeffrey Yeazell:

Your deposition transcript is now available for review  
And signature, and will be available for the next 30  
days. This review is optional. An appointment is  
required to review your transcript. Please bring this  
letter with you.

You may wish to discuss with your attorney whether  
he/she requires that it be read, corrected, and signed,  
before it is filed with the Court.

If you are represented by an attorney, you may read his  
or her copy of the transcript. If you read your  
attorney's copy of the transcript, please send us a  
photocopy of the Signature Line and Deponent's Change  
Sheet.

If you choose not to read your deposition, please sign  
here and return this letter to our office.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Sincerely,

KATHRYN DAVIS, CSR No. 3808

cc: Ms. Spaletta; Mr. Vergara; Ms. Zolezzi; Ms. Leeper;  
Mr. Williams; Mr. O'Laughlin; Mr. Tauriainen; Mr.  
Prager; Ms. McGinnis; Ms. Morris



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