

VERIFICATION OF COUNSEL

I, James D. Squeri, declare:

I am an attorney at law, duly admitted and licensed to practice before all courts of this state, and I have my professional office at Goodin, MacBride, Squeri, Day & Lamprey, LLP, 505 Sansome Street, Suite 900, San Francisco, California 94111.

I am an attorney for Powerex Corp. (“Powerex”) in the above-entitled matter.

No officer of Powerex is present in the county in which I have my office and, for that reason, I am making this verification on behalf of Crimson California Pipeline, L.P.

I have read the foregoing COMMENTS OF POWEREX CORPORATION ON THE PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE SIMON and know the contents thereof.

I am informed and believe that the matters stated therein are true and, on that ground, I allege that the matters stated therein are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California, on this 28th day of October 28, 2011.

/s/ James D. Squeri
James D. Squeri