

Comment #6– 5/3/17 – 3:40 p.m.

I would like to suggest a couple clarifications regarding the proposed ASOP 17:

- The first paragraph of the Scope does not specifically mention legislative hearings or legislative committee hearings, although these could be considered adversarial proceedings, as there would be proponents and opponents to almost any bill. The fourth paragraph of the Scope makes reference to a legislative forum, so this would imply that legislative hearings are within the scope. Clarification would be helpful.
- The definition of “expert” appears self-referential, unless perhaps the phrase “as an expert” were to be deleted.

As for the four-month lag before becoming effective, I have been involved in prior situations where there has been a lag of almost a year between written testimony and oral testimony. I wouldn’t necessarily anticipate issues related to this, but would it be possible to stagger the effective date in such a way that if a report is submitted supporting oral testimony and prior to the ASOP effective date, the prior ASOP rather than the new ASOP would apply to the oral testimony?

Sincerely,

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Principal and Consulting Actuary