

The Friday Burrito

Peace is What Happens in Between Wars

"Europe was created by history. America was created by philosophy."

Margaret Thatcher

"The 'what should be' never did exist, but people keep trying to live up to it. There is no 'what should be', there is only 'what is.'"

Lenny Bruce



Do you care to join me in feeling (sick) that the fabric of the civilized world is coming undone? My heart aches for the victims in Israel and my hate intensifies for terrorist organizations like Hamas and Hezbollah. The downward swing in my outlook started on January 6, 2021. I thought our democratic form of government was suddenly at risk and I haven't changed my tune in that regard since. Then the Russian invasion of the Ukraine piled on more sorrow ... and more unanswerable questions. What can I say about this week's attack of Israel in the Gaza? Organized hate is in vogue. The question remains how did civilization ever progress from the cave? Does social progress randomly reverse itself for any number of reasons and make us collectively worse off?

I continue to absorb a lot of information about the conflict in the Middle East since it started last Saturday, but I didn't realize until this week that a proposed peace settlement was percolating between Saudi Arabia and Israel and that may have sparked the leadership in Iran to commence the attack against Israel through several of its terrorist mobs. There's no such thing as a gentle peace when a third party feels threatened. And that is how the world works. People die for this. Innocents are slaughtered because of it. Retaliation thrives for it.

The Wisdom of Thomas Sowell

Two readers encouraged me to study an [opinion piece that ran in the WSJ over the weekend](#) that was an interview with 93-year old Hoover Institution Fellow Thomas Sowell. The title was, "*Thomas Sowell on the Trouble With 'Social Justice'*". I was not familiar with Sowell's extensive work in economic history. He is a Ph.D. graduate of the Chicago school and received his degree a handful of years before I started, much like this year's Nobel Prize winner in economics, Claudia Goldin. After reading Sowell's bio and list of publications I rued not following him before now.

So, what is he all about? He classically explains that the idealistic aim of achieving freedom, equality, and social justice by assuming away the obstacles that may limit it is counterproductive.

Vol. XXVI #29
October 13, 2023

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Western States Ticker

CAISO YTD Renewables Curtailment:

CAISO YTD Renewables

Curtailment:

As of 9/30/23: 2,343,123 MWh

As of 9/30/22 2,257,168 MWh

% of solar and wind output curtailed relative potential renewables production:

YTD as of Sept. 2023 4.53%

YTD as of Sept. 2022 4.50%

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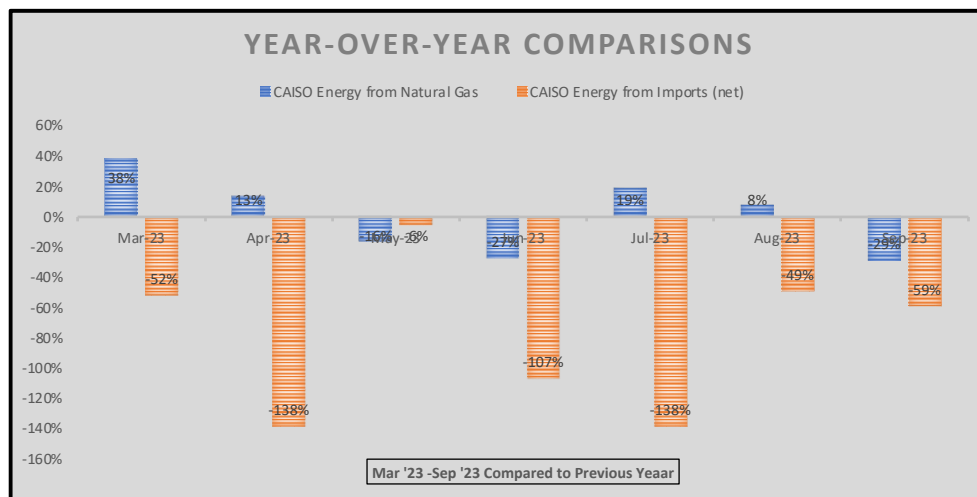
Modern liberal ideology advocates removing hurdles that disproportionately weigh upon minorities and disadvantaged groups. Sowell argues that the concept is counterproductive. Per the [WSJ](#) article, "*The ... utopian view of the human condition [is] the belief that there are no inherent limits to what mankind can accomplish, so trade-offs are unnecessary. World peace is achievable. Social problems such as poverty, crime and racism can be not merely managed but eliminated ... the central fallacy of social-justice advocacy is 'the assumption that disparities are strange, and that in the normal course of events we would expect people to be pretty much randomly distributed in various occupations, income levels, institutions and so forth.'*" It takes a lot of chutzpah to state that in today's academic environment. Amen and bravo.

The fallacy of placing hope ahead of hard evidence is also relevant in our industry because for the last decade there has been a virus infecting energy policy elites. They believe any idea to reduce carbon emissions is a good one regardless of either cost, outcome, or feasibility. The disparate elements of real-world energy production and distribution are treated like game pieces on a checkerboard. Move this way or jump that way and it will all work out. My tongue-in-cheek System Planning Coloring Book. Painless net zero energy for the asking. Sowell makes a similar analogy regarding social justice: "*He says that whether social-justice proponents are pushing for slavery reparations or higher taxes on the rich, their real agenda is the confiscation and redistribution of wealth. Enthralled by what he calls the 'chess-pieces fallacy,' progressives treat individuals like inert objects.*" Chess or checkers, the idea abides.

It's a thought-provoking interview and I encourage you to read it.

CAISO Energy from Gas and Imports Down in September

Social justice may be one thing, but fuel equality is another. The year-over-year comparison for September shows that both gas burn and net imports significantly dropped. The figure below shows the last seven months of comparisons.



Recall that in September of last year, California and much of the West experienced a slow-moving heatwave that popped the thermometers to the max. On September 6, 2022 the CAISO called an Emergency Energy

What we believe...

Competition yields lower electricity rates. Stable and transparent rules and regulations promote private investment.

Private investors, rather than utilities, will spend money on new power plants and transmission facilities if they can earn a return that is balanced with the risks.

Private sector investment results in lower average prices without risking consumers' money.

However, when IOUs do the investing, the risks to them are minimal or non-existent because ratepayers cover all the costs.

Overcapacity lowers electricity spot market prices; yet retail rates can increase in this case due to full cost-of-service regulation.

Markets work best when there are many buyers and sellers.

At-risk money will be put to investment where markets exist that are well regulated and yield credible price.

Alert 3 (EEA3) during the net-peak hour but never shed firm load. The California Governor's Office of Emergency Services (OES) issued a text-message alerting millions of individuals to reduce electricity consumption. It was an event day for all of us to remember. To meet load, all of CAISO's resources were needed (plus voluntary demand reductions) including the energy production from the natural gas fleet. Thus, the reduction in gas burn during this year's September relative to last year's might be expected. Also, the lack of in-state hydro availability last year was severe, and the plentiful rains did not arrive until September 16th.

The reduction in net imports demonstrates that the factors encouraging CAISO exports remain alive and well. Again, it would be nice if the CAISO reported gross imports and exports in its 'Today's Outlook' platform. Guessing what's behind, say, -2,000 MW of net imports is hazardous duty. No way to get there. On the page below is a plot of the net imports for the solstice weekday of September 21st, comparing this year with last year. That day occurred after the 2022 heat storm and after the rain started to fall in large volumes.

[Continued on the next page](#)

And what we should do ...

Believe in ourselves.

Encourage creation of independent, multi-state regional transmission organizations that coordinate policies with respective state utility commissions.

Support rules for resource adequacy that applies uniformly among all load-serving entities.

Enforce competitive solicitations by utilities for purchasing either thermal or renewable power.

Support choice among retail electricity customers.

Lobby for core/non-core split of retail customers.

Advocate against policies that limit, through bid mitigation, merchant returns on investment that are comparable to utility returns.

Simply Suedeem

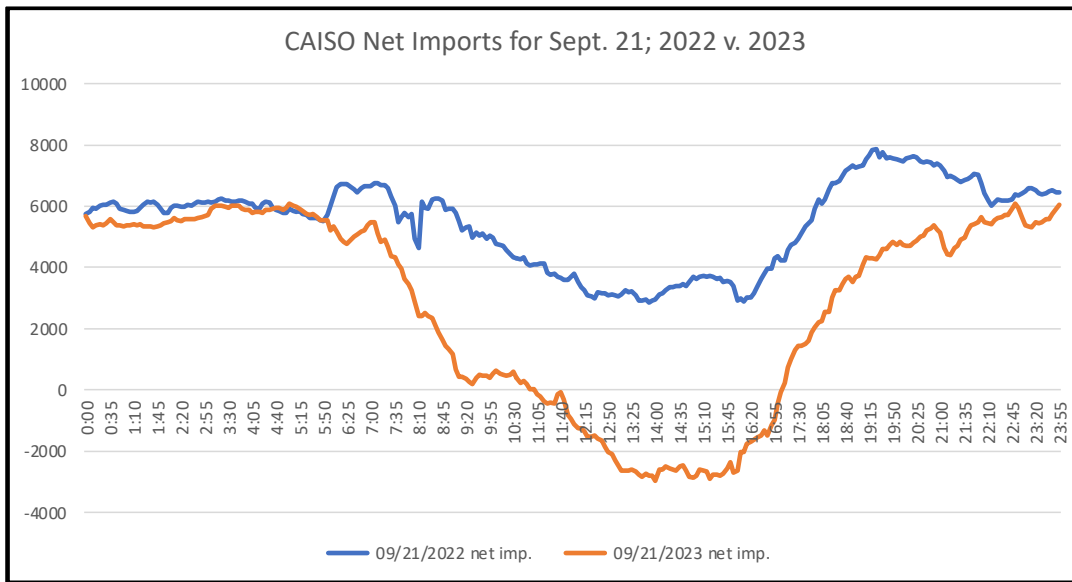
[Click here to learn more about Suedeem Kelly](#)



It's been two months since CAISO filed tariff changes to implement its Day-Ahead Market Enhancement and Extended Day-Ahead Market initiatives to "increase reliability, decrease costs to ratepayers, optimize generation dispatch across a wider footprint, and help participants in the states they serve achieve clean energy policy objectives." This is likely the most anticipated filing at FERC in the last decade, and it has drawn a record-breaking 70+ interventions from across the Western states. Notably, only a few have protested the filing. Even the Western Energy Imbalance Market Body of State Regulators "generally supports" it. This widespread support makes it pretty much a slam dunk to win FERC approval. CAISO requests approval by December 21st to "go live" in 2026.

Although there are few protests, some ask FERC to "adjust" the filing, including directing CAISO to mitigate potential natural gas-electric coordination issues, encouraging CAISO to work with the Western Power Pool on interoperability concerns, and encouraging CAISO to collaborate with SPP on a seams agreement. Also, Western states' concerns about California's outsized influence over this market remain intense--leading directly to the growing popularity of SPP's competing day-ahead and real-time markets, SPP Markets+. So far, 31 Western entities support SPP Markets+. One big player, Bonneville Power Administration, has not yet chosen between the two, but CAISO's state-run governance appears to be a non-starter for Bonneville. As SPP's proposal gains traction, some worry California could find itself isolated. SPP replies, not to worry—its expansion into the West will not impact California's ability to trade with other states. (Note, I don't think that's exactly what worries California....) SPP says it will file its market plan with FERC in Q1 2024. The Wild West continues to earn its name.

The maximum difference between the same days one year apart is 6,600 MW in net imports at 3:20 p.m. Let's posit that the variance is due mostly, if not entirely, to power exports out of the CAISO. It could be. And the numbers, if correct, are astonishing.



Green Hydrogen Startup Company Makes Waves

I have been more than a bit skeptical about the promise of green hydrogen. At least with respect to the supply needed at a competitive price. Subsidies and free-renewable-energy assumptions abound when investigating the merits of green hydrogen, but the reality is that subsidies eventually go away (presumably) and nothing is free. However, [the WSJ reported last week that a Massachusetts startup called Electric Hydrogen](#) came up with a better mousetrap.

Here is how the process works, according to the article: *"Inside the company's electrolyzers, heated water moves horizontally through ridges and channels in specially designed stacked plates. Metal-coated membranes split the water into hydrogen and oxygen. The reaction creates hydrogen bubbles, which are then cooled. The oxygen is vented into the air or reused. It is a delicate dance that can be thrown off by the smallest impurities in the water or difficulties getting power to the plates where reactions happen ... Electric Hydrogen believes it has cracked the device by starting from scratch and using new plate engineering focused on the performance of bigger electrolyzers. Testing hundreds of the larger devices that use less precious metal and can run on intermittent renewable power lowered costs and unlocked better results."* I sort of understand the process, but it hasn't been demonstrated at commercial scale, yet! Electric Hydrogen has tested many small-scale and large-scale electrolyzers to see how water splits in different conditions, but that aside the company has attracted a cool \$1 billion in funding.

High Interest Rates Can Cripple the Power Biz

Most of you may be too young to remember the high-inflation era that began during the Carter Administration in the late 1970s. I was an analyst at a consulting firm that started every report or proposal prepared for either EPRI or DOE funding with the same tired line: "In an age of high interest rates and rapidly escalating capital costs ..." It seemed that everything followed from that. Inflation was tamed, eventually, and I believe it was due to the growth in productivity starting with the dot-com boom that ushered in the worldwide web and the internet. Limits to monetary growth not so much. Glory be, we haven't quite gotten off that productivity uplift yet. However, persistent inflation causes many bad things to happen in our industry. For example, investor-owned utilities suffer from regulatory lag. Costs race ahead of revenues and earnings drop, and then credit ratings are lowered. Evil cycle.

Capital intensive projects become utility albatrosses. I believe that the inflation of the Carter era helped arrest the nuclear power industry along with strong objections by environmentalists, and equally deep negative public opinion in the aftermath of the Three-Mile Island accident. Oh yeah, lest we forget the 1979 shock-movie, [The China Syndrome](#).

Well, inflation is back and will be around for a while. The analysts at Bank of America/Merrill Lynch (BofA Securities, or BofAS) observed in a recent industry overview that higher interest rates are causing financing challenges for utility-scale renewable projects that are close to commercial operation or under construction. It's not that the renewable-project developers are suffering, but that the financing costs are escalating and ruining what were deemed reasonable cost projections even six months ago. *"Renewable generation projects are effectively a microcosm of large-scale infrastructure projects and thus the return profile and associated cost of capital ultimately mirrors that of industries in that vein ... Our latest checks suggest that while the cost of debt has undoubtedly increased, debt structuring remains effectively stagnant with utility scale solar projects ... Investors are asking us how asset level returns are affected by an increase in rates and if renewables developers will continue to develop assets as rates continue to trend higher. Our general answer is "yes," which links back to basic project economics."*

Wouldn't that be a kick in the pants if higher interest rates muted the renewables feeding frenzy caused by the Inflation Reduction Act (IRA)?

Things In the People's Republic of California

U.S. EVs on IVs

If you accept Elon Musk's view that future electricity demand will grow much faster than predicted, then you also agree with his three pillars of clean-energy growth ... power production, transportation, and electrification of processes and appliances ... and each will exceed our current expectations. I am not so sanguine with that outlook. I believe we have seen the power sector transform itself on an unsteady and uncertain path despite the legislative mandates for net-zero economies and federal tax incentives. Electrification of the transportation sector is a big if especially in regard to trucking, rail, and air. As for electrification of home appliances and businesses, I think it will be the last chapter of the System Planning Coloring book. About as fanciful as the California utilities once predicting circa 1960 there would be a nuclear power station every twenty miles along the state's coastline. How did that prediction work out?

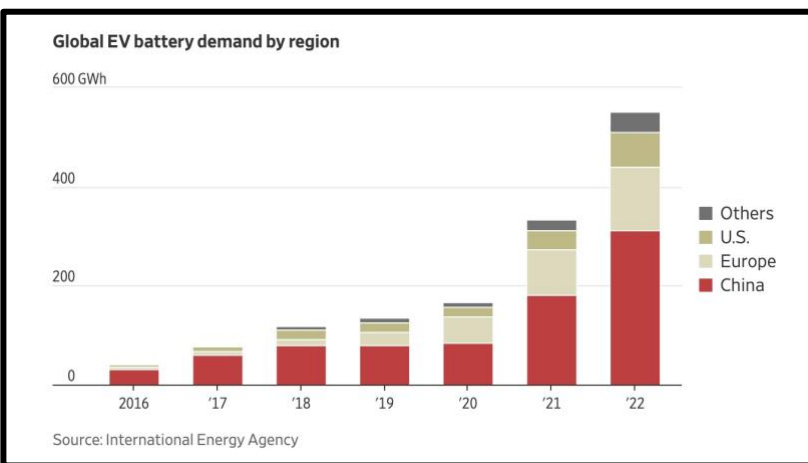
Today, I aim to gather recent media articles on the condition of the U.S. EV market. There's a lot going on, and it is difficult to winnow the wheat from the chaff. Maybe Mr. Musk is confident of the near-term outcome, and as I am an early shareholder of Tesla stock, I harbor no ill will against the company (God forbid), but I have many doubts about the success of non-Tesla EVs. Let's examine some of the reasons.

Mark Mills is a journalist I greatly admire and respect. He is a Senior Fellow at the Manhattan Institute and a faculty fellow at Northwestern University's engineering school. I have reviewed several of his [WSJ](#) contributions in past Burritos. [Last July, Mills published a report](#) entitled, "*Electric Vehicles for Everyone? The Impossible Dream*," which puts a huge dent in the concept of state governments outlawing the sale of new internal combustion engine (ICE) trucks and autos, or the EPA's attempt to jack up the mileage standards of new-car fleets sold in the U.S. His treatise is well-researched and a long read. I won't try to review it all herein. However, his opening observations are noteworthy:

- *Rarely has a government, at least the U.S. government, banned specific products or behaviors that are so widely used or undertaken. Indeed, there have been only two comparably far-reaching bans in U.S. history: the Eighteenth Amendment to the U.S. Constitution, which prohibited the consumption of alcohol (repealed by the Twenty-First Amendment); and the 1974 law prohibiting driving faster than 55 mph. Neither achieved its goals ...*
- *The thesis that an "energy transition" eliminating hydrocarbon use is both necessary and inevitable. The ICE ban echoes other energy transition ideas but with an important distinction. Electricity production mandates, for example, that ban the use of coal and even natural gas "merely" raise costs, while the product that consumers use, kilowatt-hours, remains largely unchanged in its utility. EVs ... do not have the same utility and are neither operationally nor economically equal for most citizens.*
- *Banning ICE cars and mandating the use of EVs, policymakers are explicitly betting on the truth of three crucial claims:*
 1. *EVs will lead to "profound" reductions in CO2 emissions*
 2. *EVs are now, or will soon be, cheaper than, and operationally equal to, ICE cars*
 3. *There is a diminishing role for the automobile in modern times; in effect, there is a generational realignment in how citizens seek personal mobility.*

Bad bets IMHO.

Let's move on. The critical component for EV manufacturing is the battery pack. Forty percent of a new-EV cost is embedded in the materials for such. The global sources for much of the battery raw elements are located in China, *a foreign entity of concern*, but not in the U.S. which is a problem for EVs and battery product lines that



desire federal incentives. [Yesterday, the WSJ showed how battery manufacturing](#) based in China is entering the U.S. using a side door through Morocco or South Korea to be eligible for the IRA largesse. *"Chinese businesses that supply raw materials to make EV batteries have announced at least nine joint ventures and investments worth more than \$4.5 billion in South Korea this year ... At least four Chinese firms said they plan to build plants in Morocco producing battery-related products. Morocco sits on over 70% of the world's known phosphate reserve, a raw material key*

to EV batteries." Is the bypass a lifeline for U.S. EVs or just a temporary lift?

The figure above from the same [WSJ](#) article is an interesting breakdown of the demand for EV batteries. China and Europe are the lion's share of the demand. Since China's electricity grid is heavily supplied by coal it staggers the mind to understand how global carbon emissions will decline by wider EV usage there. In the U.S., the carbon footprint of EVs relative to global emissions is modest depending on which grid supplies the electricity.

Presently there are about 40 different vendors of EV autos and light trucks. Outside of Tesla and Ford's Mustang Mach-E, the other offerings are not selling well. For example, Rivian Motors loses over \$30,000 on each light truck it sells and is burning through its cash at a rapid clip. [Per the WSJ piece on it](#), *"Rivian vehicles sell for over \$80,000 on average. Yet they're so expensive to build that in the second quarter the company lost \$33,000 on every one it sold ... In two years, Rivian has blown through half of its \$18 billion cash pile, in part because it struggled to master the nuts and bolts of manufacturing."* Sustainable EVs are not cash-flow sustainable at those levels. Rivian vehicles will be a collector item much like Deloreans are today.

Finally, the UAW strike at GM and Ford come at a time when their respective launch into EVs is costing them big bucks. The auto giants can fight only so many battle fronts at the same time. As Elon Musk tweeted on X about the auto workers strike, keeping in mind that Tesla has non-union assembly lines, "*The combination of a 40% pay rise and a 32-hour working week is a sure way to drive GM, Ford and Chrysler bankrupt in the fast lane.*" True enough, it took six years for Tesla to achieve product profitability and it's unlikely that the big three will move a lot faster than that. There is a question if the size of the UAW labor force on an EV assembly line will be the same number of laborers as that for conventional ICE vehicles. [Per the WSJ](#), "*As Ford negotiates on two fronts to keep costs in check, the big unknown is how quickly Americans will embrace EVs in the categories Detroit dominates: pickup trucks and full-size sport-utility vehicles. It is early days: F-150 Lightnings accounted for 2% of all F-series sales in the eight months through August. Rivian, the only EV startup focused on Detroit's niche, expects to produce just 52,000 vehicles this year. And Tesla still isn't selling its 'Cybertruck'.*"

I scanned about a hundred reader [feedback comments](#), and the best of the lot was this: "*EVs are going to become the Big Three's white elephant if they try to convert completely to an all EV line built by an all UAW work force. For one thing, they should plan on offering hybrids well into the future. Other car makers such as Toyota are doing exactly this. Whether any of the Big Three can ever make money on EVs manufactured entirely by a UAW work force is highly problematical. This whole EV transition forced onto the Big Three by the U.S. Government is a recipe for BK for all three companies. The U.S. population isn't likely to buy into EVs nearly as quickly as the government wants and projects.*" Amen.

Grand Phunk Salsa a la EnergyGPS

Look Back and Look Forward

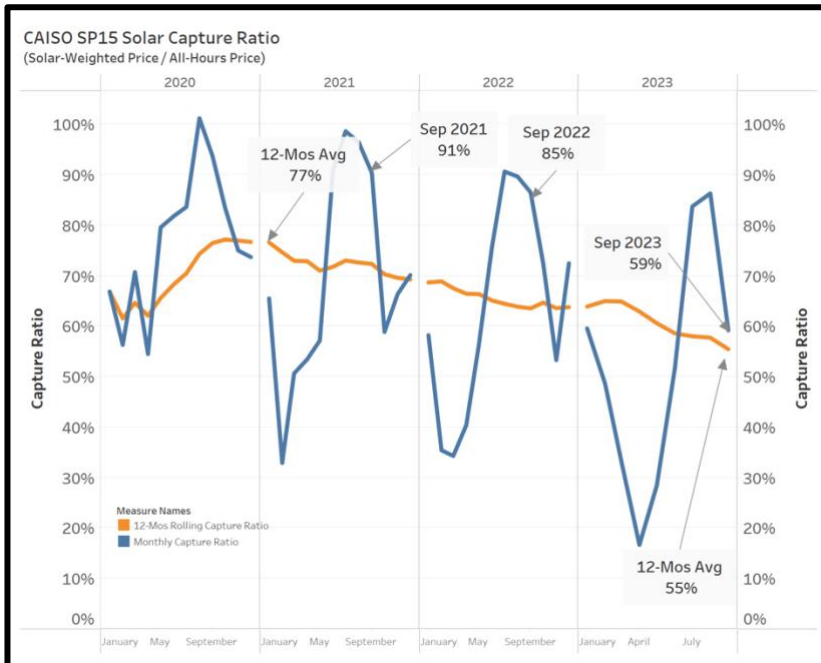
With Q3 fading in the rearview mirror, it is a good time to take stock of some of the highlights from the summer. The summer had some fireworks but was largely manageable, and the CAISO seems as healthy as we've ever noticed in recent memory (see [two paragraphs below](#)).

Broadly speaking, we observed in the West a tale of three markets and two "summers." The first summer was July and August when we saw high prices and scarcity outside of the CAISO. For these months, Palo Verde and Mid-C were strong – but for slightly different reasons. Palo Verde was strong due to the sustained hot weather, averaging about \$123/MWh for the two months. The Mid-C came in around \$113/MWh for July and August, but perhaps \$25/MWh came from Washington carbon. The CAISO was unremarkable with ICE cash prices for SP15 averaging \$57/MWh for the two months. Then in September, scarcity left the market with Palo Verde and Mid-C prices falling precipitously, coming in at \$45 and \$63, respectively. Mid-C continued to be buoyed by carbon pricing. SP15 also came in lower at about \$41. Some of this decline was driven by lower natural gas prices, but a large portion of the decline was driven by lower market-clearing heat rates.

Speaking of a healthy CAISO, one of the metrics we track is the solar capture ratio. This is a simple function with the Solar-Weighted price in the numerator and the All-Hours price in the denominator. It's a useful indicator to compare renewable performance across time (and place). The figure on the next page below shows the solar capture ratio by month from January 2020 through September 2023 in blue, and the 12-month rolling average of the capture ratio in orange.

While it was no surprise that the solar capture ratio in SP15 declined over time – the 12-month rolling average was 77% in January 2021 and down to 55% at the end of September—the September 2023 monthly capture ratio of 59% represented a big change. The capture ratio for September 2022 was 85% and in September 2021 it was 91%. Dropping that much in one year is impressive. The maximum daily solar output in September 2023

was 14.7 GW versus 12.2 GW last year, an increase of 20%. About 10% of solar production occurred in an hour when the SP15 real-time hub LMP was negative. Total September solar curtailments were up 29% from 2022.



Concluding Comment: There is never a dull moment in Western U.S. energy markets. With new solar hitting the grid at a rapid pace, we may be at a critical inflection point. The CAISO solar additions are outstripping the ability of the Western EIM to move that energy off to other balancing authorities or to the growing battery storage fleet, which can shift the energy release to later hours.

The above Op Ed is from the team at EnergyGPS with Tim Belden as the lead writer. EnergyGPS covers the intersection of renewables and wholesale markets in our "Renewable Monthly Report," which is part of the EnergyGPS eCommerce Platinum Plus package. For more information, email sales@energygps.com.

Shout Outs and Murmurs (👁️ & 🧠)

Just a couple of notes. Steve Huntoon, who writes a regular column for RTO Insider, commented about the Burrito query regarding a WSJ story on battery energy storage critically "helping" ERCOT during last summer's heat wave. Steve reminded me of [the story he investigated](#) about a planned community in Florida that survived Hurricane Ian without any power interruptions because it was reported by others that, "the lights stayed on during the hurricane because of solar panels and battery storage." An amazing claim that Steve showed was untrue. Read his copy. It's great stuff.

Here is an anonymous note that was prompted by Tim Belden's column in the last Burrito that examined CAISO net interchange and how it is affected by the Energy Imbalance Market (EIM): "It is my understanding that in the movement of energy in the CAISO's EIM there is no specified-source NERC e-tag. The tag says, for example, 500 MW of CAISO gen was moved to NV Energy. I'm not sure how carbon gets measured with that general e-tag. That situation is problematic with sink accounting for Renewable Energy Certificates (REC) generation. We need a California Energy Commission ID on the NERC e-tag for Renewable Portfolio Standard (RPS)

Corn Bread with Chef [Laura Manz](#)

"Chilly weather means heartier fare. Corn bread makes a great accompaniment and can be quickly assembled with ingredients on hand. While true southern corn bread doesn't add flour, this version is a bit



fluffier. If buttermilk is not a staple in your refrigerator, then substitute Greek yogurt with terrific results.

Add more sugar if there's a sweet tooth to be satisfied, up to ¼ cup."

Whisk the dry ingredients together: 1¼ cups cornmeal, ¾ cup flour, 1 Tbsp. of sugar, 2 tsp. of baking powder, ½ tsp. of baking soda, ½ tsp. of salt. In a separate bowl, whisk together the wet ingredients: 2 eggs, ¾ cup milk, 2/3 cup Greek yogurt or buttermilk. Combine the wet and dry

accounting, which dictates the carbon and REC sink. However, this does not occur in the EIM.

"As a former Load Serving Entity (LSE) energy procurement manager, I wanted to buy the carbon-free attributes from any of the large Pacific Northwest hydro utilities and dispatch it through the EIM to California. However, the CEC would not allow this as there was no NERC e-tag for a specified source, but there was a real-time dispatch (Automated Dispatch System or ADS) deemed delivered into California. I wanted to use the ADS dispatch as proof of my import to CA vs the NERC specified source e-tag. The CEC said CARB did not like that scheme."

There's a lot to unpack in that letter. I hope Clare Breidenich gets a chance to opine on it. One thing I do know or have learned is that renewable generation scheduled by the jurisdictional utilities in California get RPS credit for their EIM exports that are coming from renewables. That's a bit crazy in my view. California ratepayers underwrite clean-energy exports to EIM partners and in so doing boost the utility's ability to comply with the in-state RPS mandate.

ingredients and add 2 Tbsp. of melted butter. Pour mixture in a buttered 9x9 baking dish, or for a crunchy exterior, a 9" cast iron skillet. Bake at 425° for 20 minutes until a toothpick in the center comes out clean.

Thanks, Laura. I like the crisp corners around the baking dish for my morsel. I've tasted corn bread, and banana bread, but I don't think I have ever seen or tasted pumpkin bread. Does it exist?

Odds & Ends (_!_)

If you selected the meat-filled Burrito, then here are your stories:



THREE ORNERY GRANDMAS

Three old ornery grandmas were sitting on a bench outside a nursing home. About then an old man walked by, and one of the grandmas says, "We bet we can tell how old you are."

The old man said, "There ain't no way you can guess it."

One of the ornery grandmas said, "Sure we can! Just drop your under shorts and we can tell your exact age." He did.

The grandmas stared at him for a while and then they all piped up and said, "You're 84 years old!"

The old man was stunned. "Amazing!" how did you guess that?" The ornery old grandmas laughed. Slapping their knees and grinning from ear to ear, all three happily yelled in unison, "You told us yesterday."

Reasons Not to Mess with Children

The children had all been photographed, and the teacher was trying to persuade them each to buy a copy of the group picture.

'Just think how nice it will be to look at it when you are all grown up and say, 'There's Jennifer, she's a lawyer,' or 'That's Michael, He's a doctor.'

A small voice at the back of the room rang out, 'And there's the teacher, she's dead.'

--oo--

A Sunday school teacher was discussing the Ten Commandments with her five and six year-olds. After explaining the commandment to 'honor' thy Father and thy Mother, she asked, 'Is there a commandment that teaches us how to treat our brothers and sisters?'

From the back, one little boy (the oldest of a family) answered, 'Thou shall not kill.'

That was fun. Let's do it again next week. Have a great weekend, y'all.

gba