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SOAH DOCKET NO. 473-10-5919  
PUC DOCKET NO. 38484

APPLICATION OF WIND ENERGY  
TRANSMISSION TEXAS, LLC FOR A  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY FOR THE PROPOSED  
SCURRY COUNTY SOUTH – LONG  
DRAW – GRELTON – ODESSA 345-KV  
CREZ TRANSMISSION LINES IN  
SCURRY, MITCHELL, BORDEN,  
HOWARD, DAWSON, MARTIN,  
MIDLAND, AND ECTOR COUNTIES

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BEFORE THE STATE OFFICE  
  
OF  
  
ADMINISTRATIVE HEARINGS

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REBUTTAL TESTIMONY

OF

STANLEY C. TESSMER

ON BEHALF OF

WIND ENERGY TRANSMISSION TEXAS, LLC

NOVEMBER 9, 2010

8/81

November 9, 2010  
WIND ENERGY TRANSMISSION TEXAS, LLC

**SOAH DOCKET NO. 473-10-5919  
PUC DOCKET NO. 38484**

<b>APPLICATION OF WIND ENERGY</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>TRANSMISSION TEXAS, LLC FOR A</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE AND</b>	<b>§</b>	
<b>NECESSITY FOR THE PROPOSED</b>	<b>§</b>	<b>OF</b>
<b>SCURRY COUNTY SOUTH – LONG</b>	<b>§</b>	
<b>DRAW – GRELTON – ODESSA 345-KV</b>	<b>§</b>	
<b>CREZ TRANSMISSION LINES IN</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>SCURRY, MITCHELL, BORDEN,</b>	<b>§</b>	
<b>HOWARD, DAWSON, MARTIN,</b>	<b>§</b>	
<b>MIDLAND, AND ECTOR COUNTIES</b>	<b>§</b>	

**REBUTTAL TESTIMONY OF STANLEY C. TESSMER ON BEHALF OF**  
**WIND ENERGY TRANSMISSION TEXAS, LLC**

- I. POSITION AND QUALIFICATIONS**
- II. PURPOSE OF TESTIMONY**
- III. WETT’S ESTIMATED COSTS COMPARED TO THE CTO STUDY ESTIMATES**
- IV. OIL AND GAS DEVELOPMENT AND WATER WELLS**
- V. MONOPOLES**
- VI. PROPERTY NEAR SUBSTATIONS AND SWITCHING STATIONS**
- VII. EFFECT ON RADIO, CELLULAR AND OTHER FORMS OF WIRELESS COMMUNICATION.**
- VIII. CONSTRUCTABILITY OVER ROUGH TERRAIN**
- IX. SAFETY CONCERNS**
- X. RESPONSE TO BOBBY CALLOWAY’S PROPOSED MODIFICATION**
- XI. CONCLUSION**
- XII. AFFIDAVIT**

**Exhibit: STR-1: Stanley Tessmer's Work Papers**

1 **I. POSITION AND QUALIFICATIONS**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Stanley C. Tessmer. My business address is 210 Barton Springs  
4 Road, Suite 150, Austin, Texas 78404.

5 **Q. PLEASE STATE YOUR CURRENT EMPLOYER AND POSITION.**

6 A. I am a Project Manager for Wind Energy Transmission Texas, LLC (WETT).

7 **Q. DID YOU PROVIDE DIRECT TESTIMONY IN THIS DOCKET?**

8 A. Yes. My direct testimony provides information regarding my background and  
9 qualifications.

10 **Q. HAVE YOU REVIEWED THE TESTIMONY FILED BY AND ON BEHALF OF**  
11 **INTERVENORS AND THE TESTIMONY FILED BY PUBLIC UTILITY**  
12 **COMMISSION OF TEXAS STAFF (STAFF) IN THIS DOCKET?**

13 A. Yes.

14 **II. PURPOSE OF TESTIMONY**

15 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

16 A. The purpose of my rebuttal testimony is to respond to certain aspects of the  
17 testimony filed by and on behalf of various intervenors concerning the proposed Scurry  
18 County South to Long Draw to Grelton to Odessa 345 kV CREZ transmission line,  
19 including the proposed transmission line's cost, mitigation of impact to land owners,  
20 construction, maintenance, operation and structures. I address concerns related to oil and  
21 gas development and water wells, the use of monopoles, communication equipment  
22 interference, safety and the issue of constraints associated with land near substations or  
23 switching stations in particular detail.

1 **Q. IS THE INFORMATION CONTAINED IN YOUR TESTIMONY TRUE AND**  
2 **CORRECT TO THE BEST OF YOUR KNOWLEDGE?**

3 A. Yes it is.

4 **III. WETT'S ESTIMATED COSTS COMPARED TO THE CTO STUDY**  
5 **ESTIMATES**

6 **Q. MICHAEL LEE, TESTIFYING ON BEHALF OF COMMISSION STAFF, NOTES**  
7 **THAT WETT'S ESTIMATED TRANSMISSION LINE COSTS ARE HIGHER**  
8 **THAN THE CTO STUDY ESTIMATES. CAN YOU EXPLAIN WHY?**

9 A. Yes. As expected, WETT's cost estimates for building the transmission line  
10 appear higher than the estimates provided in the CTO Study, because the CTO Study  
11 admittedly did not include all the costs involved in building the lines. Comparing  
12 WETT's comprehensive estimates to the limited factors included in the CTO Study is not  
13 an "apples to apples" comparison. As an example, the CTO estimates did not include all  
14 expense values for securing the land for the ROWs necessary to build the lines; WETT's  
15 estimates include these figures. As another example, the CTO Study assumed endpoints  
16 at stations that did not then exist, and also assumed the transmission lines would follow  
17 direct, straight-line path between those fixed points. In reality, the stations are in slightly  
18 different places than the endpoints hypothesized in the CTO Study. For example, the  
19 CTO Study assumes that the Long Draw and Grelton stations are 25 miles apart, using  
20 straight-line distances. In fact, the Long Draw and Grelton stations are about 41 miles  
21 apart, using straight-line distances. Even more importantly, in actuality, transmission  
22 lines do not follow a direct path between end points, but instead periodically make turns  
23 as necessary to overcome engineering constraints and to mitigate impacts to the

1 environment and landowners. As a consequence, WETT's proposed routes are longer  
2 than the straight line estimates contained in the CTO Study.

3 One can make more of an "apples to apples," and thus a more meaningful,  
4 comparison of WETT's estimates to the CTO study by excluding real estate acquisition  
5 costs from WETT's cost estimates and then comparing those estimates to the CTO  
6 estimate on an equivalent line length basis. Such a comparison shows that the WETT-  
7 proposed preferred routes actually cost *less* per mile than the CTO Study estimate.

8 For more detail, note that the CTO Study cost estimate for the entire Proposed  
9 Project was \$167.44 million based on a total straight-line distance between the estimated  
10 endpoint locations of 111 miles and a cost basis of \$1.68 million per mile for the double-  
11 circuit line and \$1.4 million per mile for the single-circuit, double-circuit-capable lines.<sup>1</sup>  
12 Adjusted for length, the CTO cost assumptions would result in a total Proposed Project  
13 estimated cost of \$232,557,000. After removing real estate acquisition costs from  
14 WETT's estimates, WETT's estimated cost for building its proposed transmission lines is  
15 just \$226,049,000. Thus, WETT's cost estimates actually provide a savings of \$6.5  
16 million over CTO estimates, after considering line length.

17 Thus, excluding real estate acquisition costs from WETT's cost estimates, the  
18 WETT-proposed preferred routes actually cost less per mile than CTO cost estimates.

19 A copy of the summarized cost estimates for each alternative route is included in  
20 Attachment 5 to the Application. The cost estimate for the preferred routes, including a

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<sup>1</sup> The \$167.44 million and 111 mile figures were calculated by adding together the CTO Study estimates provided for each of the three lines included in the Proposed Project. For the Scurry County South to Long Draw (Central A to West A), Long Draw to Grelton (West A to West C), and Grelton (West C) to Odessa lines, the CTO Study provided cost estimates of \$72.24 million, \$35 million, and \$60.2 million and approximate lengths of 43 miles, 25 miles, and 43 miles, respectively. The estimated costs per mile for single- and double-circuit lines were specifically established in the CTO study.

1 comparison with CTO Study cost estimates, is also found in WETT's response to  
2 Question No. 13 of the Application.

3 **IV. OIL AND GAS DEVELOPMENT AND WATER WELLS**

4 **Q. INTERVENORS, INCLUDING "OCCIDENTAL"<sup>2</sup> AND CLAYTON HOOPER,**  
5 **EXPRESS CONCERNS ASSOCIATED WITH LOCATING THE**  
6 **TRANSMISSION LINE IN CLOSE PROXIMITY TO OIL AND GAS WELLS OR**  
7 **PIPELINES. DOES WETT INTEND TO CONSTRUCT ITS TRANSMISSION**  
8 **LINE WITH ANY TYPE OF ACTIVE WELL OR PIPELINE IN THE ROW?<sup>3</sup>**

9 A. No. WETT does not intend to construct the transmission line with any active  
10 wells within the ROW or with an active pipeline paralleling the transmission line within  
11 the ROW. If, after a route is selected, WETT determines that an oil and/or gas facility or  
12 other obstacle is in the proposed ROW of that route, WETT will work with all relevant  
13 parties to either relocate the facility if there is a feasible alternative or make minor route  
14 adjustments in the transmission line route to accommodate the existing facility and avoid  
15 potential impact. In the case of paralleling pipelines, WETT will generally design the  
16 transmission line to be constructed in a parallel easement so that the respective easements  
17 may abut but will not overlap. WETT will also work with the pipeline owner to  
18 determine appropriate safety and design requirements to reduce any potential impact to  
19 both facilities due to their proximity to each other. Such installations are not uncommon.

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<sup>2</sup> "Occidental" refers collectively to Occidental Permian, LLC, Permian Basic Limited Partnership, and Oxy USA WTP LP.

<sup>3</sup> All testimony discussed herein is addressed subject to the objections made by WETT on October 29, 2010. To the extent WETT's motions to strike are granted, any testimony addressing the stricken testimony may be disregarded.



1 **Q. OCCIDENTAL HAS EXPRESSED CONCERNS ASSOCIATED WITH ROUTES**  
2 **CROSSING THROUGH ITS OIL AND GAS FACILITIES. IF THE**  
3 **COMMISSION WERE TO ORDER WETT TO UTILIZE A ROUTE THAT**  
4 **CROSSES THROUGH OCCIDENTAL'S FACILITIES, WOULD**  
5 **OCCIDENTAL'S FACILITIES BE AN IMPEDIMENT TO PROJECT**  
6 **VIABILITY?**

7 A. No. There is enough flexibility built into the process for WETT to sufficiently  
8 address any of the potential obstacles raised by Occidental. This is especially true  
9 regarding Occidental's Sharon Ridge field described by Thomas Payton, who testified on  
10 behalf of Occidental. At this time, WETT does not anticipate the need to modify the  
11 routing of Link UY2. Accordingly, it appears Occidental concedes that routing through  
12 Sharon Ridge is feasible. Furthermore, WETT can address any of the potential obstacles  
13 raised by Occidental regarding its Dora Roberts and South Curtis fields. If necessary,  
14 examples of options for flexibility available to WETT in connection with this process  
15 include, but are not limited to, minor structure location adjustments, alignment changes,  
16 and structure height adjustments.

17 **Q. DOES WETT CONSIDER OCCIDENTAL'S FACILITIES TO BE A SAFETY**  
18 **HAZARD THAT WOULD RESTRICT THE CONSIDERATION OF A ROUTE**  
19 **CROSSING THROUGH OCCIDENTAL'S FACILITIES?**

20 A. Should the Commission select a route for this project that crosses through  
21 Occidental's facilities, WETT will conduct field investigations to determine any potential  
22 safety issues or other design requirements that may result from the presence of the  
23 pipeline. WETT will then address those requirements as a part of the detailed

1 transmission line design and will consult with Occidental to determine design  
2 requirements specifically related to the presence and location of Occidental's facilities.

3 **Q. OCCIDENTAL EXPRESSED CONCERNS ASSOCIATED WITH THE EFFECT**  
4 **OF CONSTRUCTION ACTIVITIES ON OCCIDENTAL'S OPERATIONS. IF**  
5 **ORDERED TO CONSTRUCT THE TRANSMISSION LINE THROUGH**  
6 **OCCIDENTAL FACILITIES, COULD WETT CONSTRUCT THE**  
7 **TRANSMISSION LINE IN A MANNER THAT MINIMIZES IMPACT ON**  
8 **OCCIDENTAL'S OPERATIONS?**

9 A. As with all relevant parties, WETT will work with the owners of mineral interests  
10 to attempt to minimize the impact of the transmission line on the use of the land during  
11 both construction and operation. Additionally, WETT's proposed transmission line  
12 design will permit WETT to parallel existing facilities at a safe distance and/or span  
13 roads and pipelines to attempt to minimize any impact on Occidental's use of its roads  
14 and pipelines.

15 **Q. MR. PAYTON SUGGESTED THAT WETT USE HYDROVAC EXCAVATION**  
16 **DURING CONSTRUCTION. WILL WETT IMPLEMENT HYDROVAC**  
17 **EXCAVATION?**

18 A. Upon selection of the route, WETT will further analyze appropriate construction  
19 techniques to efficiently and safely construct the transmission line. If WETT determines  
20 that hydrovac excavation is necessary at any point along the line, WETT is capable of  
21 implementing hydrovac excavation and will do so, if necessary.

22 **Q. GUADALUPE FALCON EXPRESSED CONCERNS THAT INSTALLATION OF**  
23 **THE PROPOSED TRANSMISSION LINE COULD POTENTIALLY COLLAPSE**

1           **WATER WELLS ON HIS PROPERTY. DOES WETT INTEND TO**  
2           **CONSTRUCT ITS TRANSMISSION LINE WITH ANY TYPE OF ACTIVE**  
3           **WATER WELL IN THE ROW?**

4    A.           No. As with oil wells, WETT does not intend to construct the transmission line  
5           with any active water wells within the ROW. If, after a route is selected, WETT  
6           determines that a water well or other obstacle is in the proposed ROW of that route,  
7           WETT will work with all relevant parties to either relocate the well if there is a feasible  
8           alternative or make minor route adjustments in the route to accommodate the existing  
9           well and avoid potential impact.

10   **V.    MONOPOLES**

11   **Q.    HAVE ANY INTERVENORS EXPRESSED A PREFERENCE FOR**  
12   **MONOPOLES OVER LATTICE TOWERS?**

13   A.           Yes. Witnesses Craig Hubbard, Ralph Miller, Tim Wilson, Bobby Calloway,  
14           James and Lois Cave, Sidney Crawford, Hunter Crawford, Mary Lou Crawford, John  
15           Anderson, and Arthur Wight II all indicated they would prefer the line to be constructed  
16           using monopole structures rather than lattice towers.

17   **Q.    IS WETT WILLING TO CONSTRUCT THE LINE USING MONOPOLES**  
18   **RATHER THAN LATTICE TOWERS?**

19   A.           Yes. As indicated in WETT's Application, WETT selected lattice towers based  
20           chiefly on cost and efficiency. WETT believes that lattice structures have advantages  
21           over monopoles, including that WETT's estimates indicate that monopoles would cost  
22           approximately 10 percent more than would lattice towers. However, WETT is capable of

1 and willing to construct the transmission line utilizing monopoles if the Commission  
2 orders that the project or portions of the project be constructed using monopoles.

3 **VI. PROPERTY NEAR SUBSTATIONS AND SWITCHING STATIONS**

4 **Q. HAVE ANY INTERVENORS EXPRESSED PARTICULAR CONCERNS**  
5 **RELATED TO THEIR PROPERTIES' LOCATION BEING VERY NEAR A**  
6 **SUBSTATION OR SWITCHING STATION?**

7 A. Yes. Mikel Jack Nail and Brandy Leigh Nail and Flint Hills Resources expressed  
8 concerns that are primarily a function of their properties' location near substations or  
9 switching stations.

10 **Q. CAN YOU SUMMARIZE MIKEL JACK NAIL AND BRANDY LEIGH NAIL'S**  
11 **CONCERN?**

12 A. Mikel Jack Nail and Brandy Leigh Nail expressed concerns regarding one of  
13 WETT's "originally proposed routes." The Nails describe that route as running north out  
14 of Oncor's Scurry County South Switching Station, turning west along Denson Road and  
15 turning back south paralleling an existing 138 kV transmission line.

16 **Q. IS WETT CURRENTLY PROPOSING A ROUTE THAT RUNS NORTH OUT OF**  
17 **ONCOR'S SCURRY COUNTY SOUTH SWITCHING STATION, TURNS WEST**  
18 **ALONG DENSON ROAD AND TURNS BACK SOUTH PARALLELING AN**  
19 **EXISTING 138 KV TRANSMISSION LINE?**

20 A. No. It appears the Nails concerns are primarily focused on some form of route  
21 proposed at an early stage in route development and the potential that such route would  
22 be utilized. However, WETT has not proposed the route which the Nails claim is  
23 unacceptable. However, given that the Nails property is close to Oncor's Scurry County

1 Switching Station, it is likely that there will be transmission lines in the area of the Nail's  
2 property. It should also be noted that the PUC requested that WETT coordinate with  
3 other TSPs connecting to the Scurry County Switching Station due to the large number of  
4 transmission lines entering the station. Such coordination has had significant impacts on  
5 WETT's routing in the area of near the Scurry County Switching Station.

6 **Q. CAN YOU SUMMARIZE FLINT HILLS RESOURCES' CONCERNS?**

7 A. Flint Hills Resources is concerned that proposed Links JJ4 and JW4 would  
8 interfere with the operation of the rail yard on its property. Flint Hills Resources also  
9 proposes two modifications to Links IW4 and C4. The first suggestion is that Links IW4  
10 and C4 be routed in a manner that parallels an existing 345-kV transmission line that  
11 traverses Flint Hills Resources property in an approximate diagonal line from northwest  
12 to southeast. The second suggestion is that IW4 and C4 be shifted north to Flint Hills  
13 Resources' existing northern property boundary.

14 **Q. WHAT IS YOUR RESPONSE TO FLINT HILLS RESOURCES' CLAIM THAT**  
15 **PROPOSED LINS JJ4 AND JW4 WILL INTERFERE WITH THE OPERATION**  
16 **OF THE RAIL YARD?**

17 A. It appears that Flint Hills Resources requested link modifications would address  
18 its concerns.

19 **Q. CAN EITHER OF THE LINK MODIFICATIONS PROPOSED BY FLINT HILLS**  
20 **RESOURCES BE ADOPTED?**

21 A. Yes. I have discussed the use of Links C4 and IW4 as modified to be on or  
22 adjacent to Flint Hill's north property line of WETT's preferred route with various  
23 personnel at WETT, and we agree the reroute is feasible.

1 **Q. CAN YOU PLEASE EXPLAIN THE EFFECTS OF FLINT HILLS RESOURCES'**  
2 **PROPOSED REROUTE?**

3 A. Yes. The proposed reroute would result in about 1,200 feet of additional  
4 transmission line and changes to the quantity and types of structures. Several lighter duty  
5 structures would be replaced by heavier duty structures capable of accommodating the  
6 additional turns that this reroute would require. Additional costs for this reroute are  
7 estimated to be around \$1,000,000.

8 **Q. IS WETT WILLING TO ADOPT FLINT HILLS RESOURCES PROPOSED**  
9 **REROUTE?**

10 A. Yes. If the Commission finds the proposed reroute advisable and orders WETT to  
11 construct it as such, WETT will construct the line utilizing the proposed modification.

12 **VII. EFFECT ON RADIO, CELLULAR AND OTHER FORMS OF WIRELESS**  
13 **COMMUNICATION.**

14 **Q. HAVE ANY INTERVENORS EXPRESSED CONCERNS REGARDING**  
15 **INTERFERENCE WITH WIRELESS COMMUNICATIONS?**

16 A. Yes. Witnesses Marcia Clark Brown, Gaudalupe Falcon, and Bobby Calloway  
17 expressed concerns regarding the transmission line's effect on various communication  
18 equipment. Ms. Brown's concerns relate to an Oncor microwave tower and access road  
19 near one of the transmission lines. Mr. Falcon's and Mr. Calloway's concerns relate to  
20 the transmission line's effect on communications equipment. Mr. Falcon also expressed  
21 concern specific to aircraft communications.

1 **Q. WILL THE EXISTANCE OF MICROWAVE COMMUNICATIONS TOWER**  
2 **AFFECT THE VIABILITY OF THE PROJECT OR WILL THE TRANSMISSION**  
3 **LINES AFFECT THE FUNCTIONALITY OF MICROWAVE TOWERS?**

4 A. No. WETT identified 62 microwave relay towers or other electronic installations  
5 within 2,000 feet of the center line of any alternative route link. Those installations are  
6 identified in Section 20 of the CCN Application. With regards to the Microwave towers  
7 specifically, as stated in Section 8.6.6 of the EAs, construction and operation of proposed  
8 links of the various proposed routes are not expected to interference with the  
9 functionality of microwave towers.

10 **Q. WILL THE PROPOSED TRANSMISSION LINE HAVE ANY EFFECT ON**  
11 **RADIO OR CELLULAR COMMUNICATION TOWERS?**

12 A. As stated in Section 8.6.6 of the EAs, WETT anticipates no interference with  
13 radio or cellular communications due to the transmission line. In fact, cellular antennas  
14 are sometimes installed on transmission towers.

15 **Q. HAS THE UNITED STATES AIR FORCE EXPRESSED CONCERNS**  
16 **REGARDING TRANSMISSION LINES?**

17 A. Yes, it has. The United States Air Force (USAF) has an antenna located south of  
18 Link UY2 called the Lake Thomas Threat Emitter Site. The USAF was concerned that  
19 WETT's proposed link might interfere with the operations of that antenna.

20 **Q. WHAT HAS WETT DONE TO ADDRESS THOSE CONCERNS?**

21 A. Mr. Dwight Williams testified on behalf of the USAF, noting that he believes a  
22 resolution can be reached that will result in little or no impact to the operations of that  
23 antenna site. Mr. Williams is correct. WETT has worked cooperatively with the USAF

1 to address line placement issues and have resolved such issues with the Air Force. This  
2 resolution is memorialized in a Cooperation Agreement between the USAF and WETT.  
3 The Cooperation Agreement has been signed by WETT and approved by USAF  
4 personnel. At this point all that is lacking is the commanding officer's signature on the  
5 Cooperation Agreement. USAF has indicated that the signature will be forthcoming. A  
6 copy of this agreement, which has been signed by WETT and delivered to USAF, is  
7 attached to the rebuttal testimony of Kenda Pollio. The transmission line is constructible  
8 in accordance with the requirements set forth in the Cooperation Agreement. Upon  
9 receipt of the USAF's signature, I will supplement this testimony to the extent necessary.

10 **VIII. CONSTRUCTABILITY OVER ROUGH TERRAIN**

11 **Q. HAVE ANY INTERVENORS EXPRESSED CONCERN REGARDING WETT'S**  
12 **ABILITY TO CONSTRUCT THE PROPOSED TRANSMISSION LINE DUE TO**  
13 **ROUGH TERRAIN?**

14 A. Yes. Gerald Lynn Fuller and Van Echols suggest that rugged terrain could  
15 interfere with WETT's construction of the transmission line.

16 **Q. IS WETT CAPABLE OF CONSTRUCTING THE TRANSMISSION LINE OVER**  
17 **THE TOPOGRAPHY WHICH THE VARIOUS ALTERNATE ROUTES**  
18 **TRAVERSE?**

19 Yes. WETT and its consultants have reviewed GIS Data from various sources to  
20 identify geographic information related to the land over which the various alternate routes  
21 traverse. Additionally, WETT acquired new aerial photography of the study area in July  
22 2009 and performed field reconnaissance of the Study Area in July, October, and  
23 November 2009; and February May, June, and July 2010. One of the objectives of the



1 field reconnaissance was to review the topography of the Study Area. WETT and its  
2 project team can state with confidence after thorough review of the topography and  
3 geographic features crossed by the various proposed alternate routes, that WETT can  
4 construct the transmission line along any of the routes proposed in its Application. After  
5 a route is selected, WETT will perform surveys of the route. If WETT determines that an  
6 unanticipated natural obstacle is in the proposed ROW and cannot be avoided by  
7 spanning the obstacle or making minor structure location adjustments, alignment  
8 changes, and/or structure height adjustments, WETT will work with all relevant parties to  
9 make minor route adjustments in the route to avoid the obstacle.

10 **IX. OTHER SAFETY CONCERNS**

11 **Q. HAVE ANY INTERVENORS EXPRESSED CONCERNS REGARDING ANY**  
12 **SAFETY ISSUES OTHER THAN ISSUES ALREADY DISCUSSED IN THIS**  
13 **TESTIMONY?**

14 A. Yes. Witnesses Ricky Miller, Sidney Jack Crawford, Hunter Grant Crawford,  
15 Mary Lou Crawford seem to express some concern over potential dangers associated with  
16 humans and/or animals wading into water near transmission lines. Additionally,  
17 Guadalupe Falcon expresses concern that fuel tanks will ignite due to electric charge.

18 **Q. CAN TRANSMISSION LINES CHARGE NEARBY BODIES OF WATER TO A**  
19 **DEGREE THAT CAN CAUSE HARM TO HUMANS OR LIVESTOCK?**

20 A. Transmission lines are safely routed near and over bodies of water on regular  
21 occasion. The proposed transmission line will not affect livestock or humans' ability to  
22 safely enter nearby water.

23 **Q. CAN TRANSMISSION LINES IGNITE FUEL TANKS BY ELECRIC CHARGE?**

1 A. WETT will not construct the line with a fuel tank in the ROW. Thus, the distance  
2 between tanks and the line will be such that a fuel tank would not ignite due to the  
3 transmission line.

4 **X. RESPONSE TO BOBBY CALLOWAY'S PROPOSED MODIFICATION**

5 **Q. HAVE YOU REVIEWED THE MODIFICATION PROPOSED IN BOBBY**  
6 **CALLOWAY'S DIRECT TESTIMONY**

7 A. Yes. The proposed reroute would shift Link Z4 from paralleling one side of an  
8 existing transmission line to the other side of the same existing transmission line. The  
9 shift would move the transmission line farther from Mr. Calloway's home. The reroute  
10 would however, place the line on Mr. Calloway's neighbor's property for a short  
11 distance. The neighbor was sent notice of this proceeding as a directly affected  
12 landowner, but has not intervened in the proceeding.

13 **Q. CAN WETT CONSTRUCT LINK Z4 AS MODIFIED BY MR. CALLOWAY?**

14 A. Yes. The modified design and its number of structures would be similar to the  
15 originally proposed alignment. However, crossing the existing 138 kV line at the north  
16 end, and again at the 90-degree turn at the south, will require taller structures. The  
17 Commission should be aware that the modification would result in an estimated cost  
18 increase of about \$150,000.

19 **XI. CONCLUSION**

20 **Q. CAN YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

21 A. Yes. In summary, my testimony states as follows:  
22 • It is feasible to construct the proposed project through areas developed for oil and  
23 gas exploration or production, properties with water wells, and areas with rough  
24 terrain.

- 1 • WETT is willing to construct the proposed project or portions of the proposed  
2 project on monopoles if the Commission so orders, but WETT estimates for this  
3 Proposed Project indicate that steel monopoles would cost approximately 10  
4 percent more than lattice towers.
  
- 5 • There are often complications regarding routing near substations as many  
6 transmission lines are located or will be located in the general area. However,  
7 WETT is willing to work with landowners to minimize the impact on their  
8 property.
  
- 9 • The Proposed Project will not interfere the functionality of communication  
10 equipment.
  
- 11 • The Proposed Project will not create safety concerns related to electrical charges  
12 affecting water or fuel tanks.
  
- 13 • The modification proposed by Bobby Calloway is feasible.

14 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

15 A. Yes.

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MIDLAND, AND ECTOR COUNTIES	§	

AFFIDAVIT

STATE OF TEXAS §  
 §  
 COUNTY OF TRAVIS §  
 §

BEFORE ME, the undersigned authority, on this day personally appeared Stan C. Tessmer, having been placed under oath by me, did depose as follows:

My name is Stan C. Tessmer. I am of legal age and a resident of the State of Texas. The foregoing testimony offered by me is true and correct, and the opinions stated therein are, to the best of my knowledge and belief, accurate, true and correct.

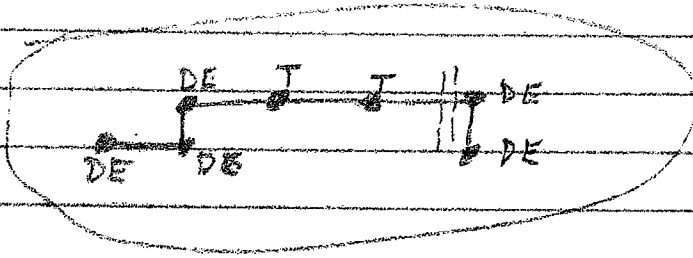
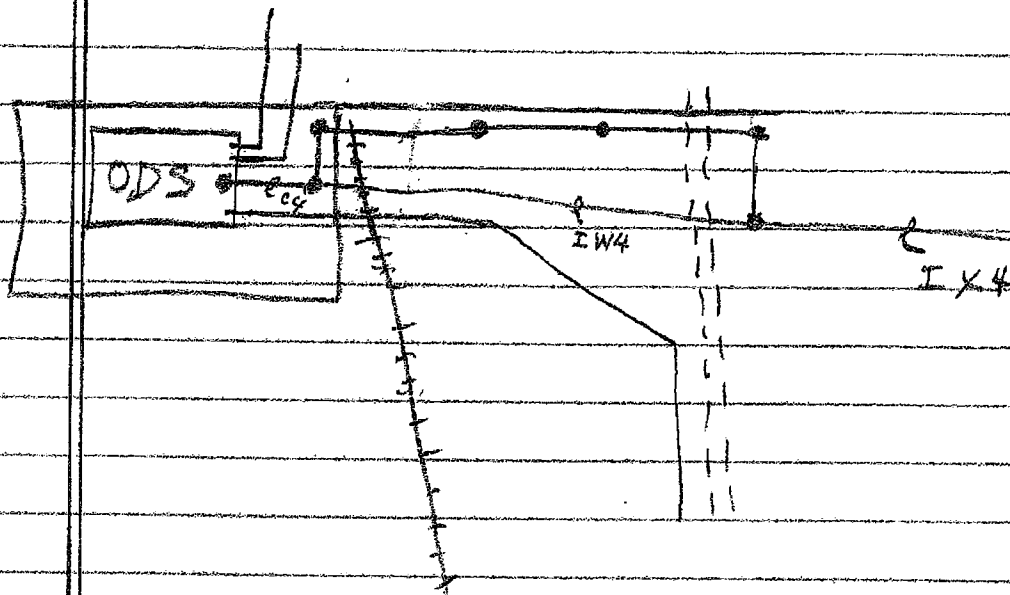
Stan C. Tessmer

SUBSCRIBED AND SWORN TO BEFORE ME by the said Stan C. Tessmer this 9<sup>th</sup> day of November, 2010.



Carrie Lynne Marchese  
Notary Public, State of Texas

06/05/2013



4000 FT

Tangents = 180 K  
 DE = 2400 K  
 Cond. = 110 K  
\$1,700



2800 FT

4 Tangents = \$90K \* 4 = \$360K  
 1 DE = \$280K

Cond. = \$80K

\$720

T = \$90K

DE = \$280K

Cond. = \$700/mi

Δ = \$ 1 M