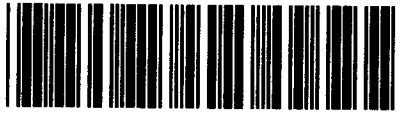




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SOAH DOCKET NO. 473-11-1266
PUC DOCKET NO. 38825

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TRANSMISSION LINES IN BORDEN, §
COKE, GLASSCOCK, HOWARD, §
MITCHELL, AND STERLING §
COUNTIES §

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REBUTTAL TESTIMONY

OF

STANLEY C. TESSMER

ON BEHALF OF

WIND ENERGY TRANSMISSION TEXAS, LLC

FEBRUARY 21, 2011

391

February 21, 2011

**SOAH DOCKET NO. 473-11-1266
PUC DOCKET NO. 38825**

APPLICATION OF WIND ENERGY	§	BEFORE THE STATE OFFICE
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MITCHELL, AND STERLING	§	
COUNTIES	§	

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

- I. POSITION AND QUALIFICATIONS**
- II. PURPOSE OF TESTIMONY**
- III. OIL AND GAS DEVELOPMENT, WIND DEVELOPMENT, AND WATER WELLS**
- IV. MONOPOLES**
- V. EFFECT ON GPS, CELLULAR AND OTHER FORMS OF WIRELESS COMMUNICATION**
- VI. RESPONSE TO VARIOUS INTERVENORS' PROPOSED ROUTE MODIFICATIONS**
- VII. RESPONSE TO PAT AND DAWN FOSTER'S CONCERNS REGARDING TOWER PLACEMENT**
- VIII. CONCLUSION**
- IX. AFFIDAVIT**

Exhibits: STR-1: Partee/Garrett Family Partnership Map
STR-2: Statement Regarding 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 Long
18 Draw to Sand Bluff, Sand Bluff to Divide, Sand Bluff to Bearkat 345 kV CREZ
19 transmission line, including mitigation of impact to land owners, construction,
20 maintenance, operation, and structures. I address concerns related to costs, oil and gas
21 development, water wells, wind generation, the use of monopoles, communication
22 equipment interference, and the feasibility of particular routing modifications proposed
23 by intervenors.

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. OIL AND GAS DEVELOPMENT, WIND DEVELOPMENT, AND WATER**
5 **WELLS**

6 **Q. DO ANY INTERVENORS EXPRESS CONCERNS ASSOCIATED WITH**
7 **LOCATING THE TRANSMISSION LINE IN CLOSE PROXIMITY TO OIL AND**
8 **GAS WELLS OR PIPELINES?**

9 A. Yes. Witnesses testifying on behalf of Targa,¹ Pat and Dawn Foster, Clark
10 McDaniel, the Currie Ranch, and the Parramore 66 Ranch² express concerns related to
11 the proposed transmission lines' proximity to oil and gas facilities.

12 **Q. DOES WETT INTEND TO CONSTRUCT ITS TRANSMISSION LINE WITH**
13 **ANY TYPE OF ACTIVE WELL OR PIPELINE IN THE TRANSMISSION**
14 **RIGHT OF WAY (ROW)?**

15 A. No. WETT does not intend to construct the transmission line with any active
16 wells within the ROW or with an active pipeline paralleling the transmission line within
17 the ROW. If, after a route is selected, WETT determines that an oil and/or gas facility or
18 other obstacle is in the proposed ROW of that route, WETT will work with all relevant
19 parties to either relocate the facility if there is a feasible alternative or make minor route

¹ "Targa" refers collectively to Targa Texas Field Services LP, Targa Resource Texas GP LLC, Targa Permian LP, Targa Permian GP LLC, and Targa Permian Intrastate LLC.

² All testimony discussed herein is addressed subject to the objections made by WETT on February 4, 2011. To the extent WETT's motions to strike are granted, any rebuttal testimony addressing the stricken testimony may be disregarded.

1 adjustments in the transmission line route to accommodate the existing facility and avoid
2 potential impact.

3 In the case of paralleling pipelines, WETT generally designs the transmission line
4 to be constructed in a parallel easement so that the respective easements may abut but
5 will not overlap, as is the standard practice. WETT will also work with the pipeline
6 owner to determine appropriate safety and design requirements to reduce any potential
7 impact to both facilities due to their proximity to each other. Such installations are not
8 uncommon.

9 **Q. DO ANY INTERVENORS EXPRESS CONCERNS THAT INSTALLATION OF**
10 **THE PROPOSED TRANSMISSION LINE COULD POTENTIALLY IMPACT**
11 **THE DEVELOPMENT OF WIND GENERATION OR WIND LEASES ON**
12 **THEIR PROPERTIES?**

13 A. Yes. James R. Currie, the Glass family, and James Irvin Terry all mentioned
14 concerns with how close transmission lines can be placed to existing wind mills or wind
15 turbines.

16 **Q. DOES WETT INTEND TO CONSTRUCT ITS TRANSMISSION LINE IN A WAY**
17 **THAT WOULD IMPEDE THE OPERATION OF EXISTING WIND TURBINES?**

18 A. No. WETT will confine construction activities to within the transmission line
19 160-foot ROW, and no turbines will be located within the ROW. Further, WETT has
20 generally attempted to maintain a 500-foot distance between the existing wind turbines
21 and the transmission ROW. This is to ensure that the transmission line will be positioned
22 beyond the wind turbine topple distance.

1 **Q. COULD TRANSMISSION LINES IMPACT FUTURE DEVELOPMENT OF**
2 **WIND GENERATION ON AFFECTED PROPERTIES?**

3 A. Not significantly. Just as WETT has kept its proposed lines a reasonable distance
4 from existing wind turbines, wind generators locating potential sites for future turbines
5 would keep their turbines a reasonable distance from existing transmission lines. In that
6 manner, wind development might be slightly impacted. However, WETT's standard
7 ROW is just 160 feet wide, so the future development of wind generation should not be
8 unduly burdened.

9 Additionally, since wind generators must connect to the electric grid in order to
10 distribute their energy to load, I believe generators consider the existence of transmission
11 lines or substations to be a positive attribute when identifying potential locations for wind
12 farms.

13 **Q. HAVE OTHER INTERVENORS BROUGHT UP ANY OTHER ISSUES IN**
14 **REGARDS TO WIND GENERATION?**

15 A. Yes. Several witnesses, including Clark McDaniel, Jordan Partee, Pat and Dawn
16 Foster, and Wesley Hodges, have said that landowners who have chosen to lease their
17 lands and profit from wind development should be burdened with transmission lines,
18 rather than landowners who have chosen to keep wind development off their properties.
19 Consistent with this, the Horwood family, which has wind development on its properties,
20 has said that because it has wind energy generation it is willing to take transmission lines,
21 so long as it has input into where the lines are located on its properties.

22

1 **Q. DO YOU AGREE WITH THE ARGUMENT THAT TRANSMISSION LINES**
2 **SHOULD BE LOCATED ON PROPERTIES WITH WIND TURBINES?**

3 A. The theory makes some implicit sense as an equity argument. More importantly,
4 it is consistent with some of the routing criteria WETT has to consider, such as aesthetics
5 and environmental concerns. Lands with extensive wind development already have very
6 tall vertical structures visible from great distances. They also are disturbed lands from a
7 natural habitat perspective.

8 However, WETT has not specifically attempted to route on lands that have wind
9 turbines, since this is not an explicit routing consideration. Additionally, as I mentioned
10 above, WETT will not place a line too close to existing turbines, so turbines are to some
11 extent a routing constraint that must be avoided.

12 **Q. DO ANY INTERVENORS EXPRESS CONCERNS THAT INSTALLATION OF**
13 **THE PROPOSED TRANSMISSION LINE COULD POTENTIALLY IMPACT**
14 **WATER WELLS OR WATER TANKS ON THEIR PROPERTY?**

15 A. Yes, Esther Bird Bunton, James R. Currie, F Bar Lands, HR Clay Ranch, Mims
16 C. Reed, Robert Michalewicz, and James Irvin Terry voiced concerns related to water
17 wells or water tanks. Eleanor Hoppe and William J. Stroman discussed year-round
18 creeks or springs on their properties as well.

19 **Q. DOES WETT INTEND TO CONSTRUCT ITS TRANSMISSION LINE WITH**
20 **ANY TYPE OF ACTIVE WATER WELL IN THE ROW?**

21 A. No. As with oil wells, WETT does not intend to construct the transmission line
22 with any active water wells within the ROW. If, after a route is selected, WETT
23 determines that a water well or other obstacle is in the proposed ROW of that route,

1 WETT will work with all relevant parties to either relocate the well if there is a feasible
2 alternative or make minor route adjustments in the route to accommodate the existing
3 well and avoid potential impact.

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

6 A. Transmission lines are safely routed near and over bodies of water on regular
7 occasion. The proposed transmission line will not affect livestock or humans' ability to
8 safely enter nearby water. Livestock and wildlife will be able to drink from stock tanks
9 and ponds near WETT's proposed transmission lines.

10 **IV. MONOPOLES**

11 **Q. DO ANY INTERVENORS EXPRESS A PREFERENCE FOR MONOPOLES**
12 **OVER LATTICE TOWERS?**

13 A. Yes. Many intervenors indicated they would prefer the line to be constructed
14 using monopole structures rather than lattice towers. A few also specified they would
15 prefer spun concrete monopoles, and witness C. Jerry Wong went into great detail about
16 another company's use of spun concrete monopoles.

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 eight percent more than would lattice towers. However, WETT is capable

1 of 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 **Q. IS WETT WILLING TO CONSTRUCT THE LINE USING SPUN CONCRETE**
4 **MONOPOLES?**

5 A. Possibly. WETT believes concrete monopoles have disadvantages over steel
6 monopoles. For example, concrete monopoles are extremely heavy—around 35 tons—
7 which can make transportation, installation and maintenance issues in some areas. If
8 significant cost savings are achievable, then the cost advantage might outweigh other
9 disadvantages. However, the company about which Mr. Wong testifies has a long history
10 utilizing concrete monopoles and may have established proprietary processes or special
11 relationships with manufacturers that allow it to obtain uniquely low costs for spun
12 concrete poles. Such a situation would not necessarily indicate that similar cost savings
13 are available across the marketplace. WETT would also be concerned with the ability of
14 concrete monopole manufacturers to supply them in sufficient quantities and in the
15 timeframes in which WETT will require them – especially since the manufacturer may
16 already be supplying for another Texas utility. Thus, if ordered to use monopoles, WETT
17 believes it should have the flexibility to use whatever type of monopole it believes is
18 appropriate for a particular project.³

19

³ This is consistent with previous Commission precedent. *See* Finding of Fact 46 in Docket No. 38354, where the Commission found: “Wherever monopole structures are approved, LCRA will have the flexibility in design to deploy both steel and spun concrete poles where appropriate for each to produce a cost effective result.”

1 **V. EFFECT ON GPS, CELLULAR AND OTHER FORMS OF WIRELESS**
2 **COMMUNICATION**

3 **Q. HAVE ANY INTERVENORS EXPRESSED CONCERNS REGARDING**
4 **INTERFERENCE WITH WIRELESS COMMUNICATIONS?**

5 A. Yes. Witnesses Charles and Marie Pechacek, Eric Seidenberger, and John B.
6 Phillips expressed concerns regarding the transmission line's effect on communication
7 equipment. These individuals are particularly concerned with the impact the proposed
8 transmission line may have on GPS-guided farm equipment.

9 **Q. WILL THE TRANSMISSION LINES AFFECT THE FUNCTIONALITY OF**
10 **WIRELESS COMMUNICATIONS?**

11 A. No. As stated in Section 8.6.6 of the EAs, construction and operation of the
12 various proposed routes are not expected to interference with the functionality of
13 microwave towers, radio or cellular communications, or GPS functionality. In fact,
14 cellular antennas are sometimes installed on transmission towers. The potential impact of
15 transmission lines on cellular or GPS communications are addressed in detail in the
16 rebuttal testimony of Jim Byerley.

17 **VI. RESPONSE TO VARIOUS INTERVENORS' PROPOSED ROUTE**
18 **MODIFICATIONS**

19 **Q. HAVE YOU REVIEWED THE MODIFICATION PROPOSED IN JORDAN**
20 **PARTEE'S DIRECT TESTIMONY?**

21 A. Yes. Mr. Partee generally asks that all routes through any of the Garrett Family
22 Partnership properties be located along property boundaries or parallel to existing lines.
23 More specifically, he asks that Link BD5 turn west and cross Highway 87 along the north

1 edge of a Garrett property and run along this northern boundary line until it meets Link
2 BC5 parallel to an existing 138 kV line. I have included a map of his proposed
3 modification at Exhibit STR-1.

4 **Q. CAN WETT CONSTRUCT THE MODIFICATION TO LINK BD5 PROPOSED**
5 **BY MR. PARTEE?**

6 A. WETT will consider it. However, the exact route he identified may be
7 problematic. Highways need to be crossed at 90-degree angles. Additionally, a turn
8 more acute than 90 degrees would be required where the modified Link BD5 would meet
9 Link BC5. A single turning structure can accommodate only a 90-degree turn, so at least
10 two structures would be required to accomplish this turn, and the line would have to
11 encroach south into the Garrett Family's property slightly. The route modification would
12 also add slightly over one-third of a mile of length. I estimate that the route proposed by
13 Mr. Partee would cost approximately \$750,000 more than the Link BD5 as it is currently.
14 If the Commission orders this modification, WETT will construct it, but WETT wants to
15 ensure the Commission is aware of the engineering and cost issues.

16 Alternatively, if the property owner to the north of the Garrett property is
17 agreeable, then perhaps a more affordable modification could be made. Link BD5 could
18 cross Highway 87 at 90 degrees north of the Garrett property and continue southwest in a
19 straight line until it meets Link BC5 at a 90 degree angle at the Garrett property line. In
20 the event the Commission orders a route containing Link BD5, WETT will pursue further
21 discussions with landowners in this area in an attempt to address the Garrett Family's
22 concerns without raising the feasibility and cost issues that their route modification
23 raises.

1 **Q. HAVE YOU REVIEWED THE MODIFICATION PROPOSED IN COURTNEY**
2 **KING AND THE HORWOOD GROUP'S DIRECT TESTIMONY?**

3 A. Yes. Since this modification is described and mapped in Kenda Pollio's rebuttal
4 testimony, I will not describe it again here.

5 **Q. IS THE MODIFICATION PROPOSED BY MR. KING AND THE HORWOODS**
6 **FEASIBLE?**

7 A. Pending agreement by affected landowners, Ms. Pollio finds it feasible from a
8 routing constraints perspective. If constructed as indicated in Exhibit KPR-2 to Ms.
9 Pollio's testimony, I find it feasible from an engineering perspective.

10 **Q. WHAT IS THE ESTIMATED COST OF THE MODIFICATION PROPOSED BY**
11 **MR. KING AND THE HORWOODS?**

12 A. The King/Horwood modification proposed in their direct testimony appears to be
13 a minor change from a route modification WETT previously discussed with these and
14 other parties. The original route modification was longer than WETT's preferred route
15 and consequently increased cost. The new modification presented in the Horwood and
16 King direct testimony would involve a cost *decrease* of approximately \$300,000 from the
17 previous route modification, as it reduces its length slightly.

18 However, this cost estimate assumes that where this route modification parallels a
19 pipeline for several thousand feet, a sufficient distance would be left between the
20 transmission line and the pipeline such that no additional pipeline mitigation would be
21 required.

22

1 **Q. HAVE YOU REVIEWED THE MODIFICATION PROPOSED IN DANNY AND**
2 **REED STEWART'S DIRECT TESTIMONY?**

3 A. Yes. Since this modification is described and mapped in Kenda Pollio's rebuttal
4 testimony, I will not describe it again here.

5 **Q. IS THE MODIFICATION PROPOSED BY THE STEWARTS FEASIBLE?**

6 A. Pending agreement by affected landowners, Ms. Pollio finds it feasible from a
7 routing constraints perspective. If constructed as indicated in Exhibit KPR-3 to Ms.
8 Pollio's testimony, I find it feasible from an engineering perspective.

9 **Q. WHAT IS THE ESTIMATED COST OF THE MODIFICATION PROPOSED BY**
10 **THE STEWARTS?**

11 A. I believe this modification would involve a cost increase of \$370,000 over
12 WETT's preferred route, previously adjusted to accommodate the proximity of a Targa
13 gas processing facility on the north side of Highway 87 near Link P6.

14 **Q. HAVE YOU REVIEWED THE MODIFICATIONS PROPOSED IN JAMES**
15 **IRVIN TERRY'S DIRECT TESTIMONY?**

16 A. Yes. Since the modifications are described and mapped in Kenda Pollio's rebuttal
17 testimony, I will not describe them again here.

18 **Q. ARE THE MODIFICATIONS PROPOSED BY MR. TERRY FEASIBLE?**

19 A. Ms. Pollio finds them feasible from a routing constraints perspective. I find them
20 feasible from an engineering perspective, albeit with fairly significant costing
21 implications.

22

1 **Q. WHAT IS THE ESTIMATED COST OF THE MODIFICATION PROPOSED BY**
2 **MR. TERRY?**

3 A. I believe that moving Link BM6 to Mr. Terry's section line modification would
4 involve a cost increase of approximately \$1,800,000 over the link's current routing.
5 Moving Link BM6 to the section line then following the caliche road through his
6 property would involve a cost increase of approximately \$1,500,000 over the link's
7 current routing.

8 **VII. RESPONSE TO PAT AND DAWN FOSTER'S CONCERNS REGARDING**
9 **TOWER PLACEMENT**

10 **Q. DID ANY INTERVENORS EXPRESS CONCERNS REGARDING TOWER**
11 **PLACEMENT?**

12 A. Yes. Pat and Dawn Foster stated that Link Q6 would put "a pole right at" the
13 entrance to their property, which concerns them because their business relies on the
14 public viewing their sign from the highway.

15 **Q. HAS WETT DECIDED TOWER PLACEMENT YET?**

16 A. No. Tower placement has not yet been decided. After a route is certificated, then
17 WETT will begin the detailed design phase. Tower placement is flexible and will not be
18 decided until more detailed line designs are developed. WETT will work with
19 landowners to ensure that towers are placed in a manner that mitigates impacts to
20 properties to the greatest extent possible. For example, under normal circumstances,
21 WETT would not locate a tower in a manner that would impede driveway access or
22 signage. If for some reason there were particular terrain issues such that the *only* possible

1 location for a tower were directly in front of the Foster's sign—which is highly
2 unlikely—then WETT would relocate the Foster's sign to ensure it remains visible.

3 **VIII. CONCLUSION**

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

5 **A.** Yes. In summary, my testimony states as follows:

- 6 • It is feasible to construct the proposed project through areas developed for oil and
7 gas exploration or production, areas developed with wind energy generation, and
8 properties with water wells and wind mills.
- 9 • The Proposed Project will not create safety concerns related to electrical charges
10 affecting water or fuel tanks.
- 11 • WETT is willing to construct the proposed project or portions of the proposed
12 project on monopoles if the Commission so orders, but WETT estimates for this
13 Proposed Project indicate that steel monopoles would cost approximately eight
14 percent more than lattice towers. WETT has not developed detailed cost
15 estimates for concrete monopoles, and requests that the Commission give the
16 company flexibility to select the appropriate type of monopole, if monopole
17 construction is ordered.
- 18 • The Proposed Project will not interfere with the functionality of communication
19 equipment.
- 20 • The route modification proposed by Jordan Partee presents engineering
21 difficulties and increased costs. The route modifications proposed by Courtney
22 King and the Horwood Group, Danny and Reed Stewart, and James Irvin Terry
23 do not present engineering difficulties but, would increase costs over WETT's
24 initially proposed links. The route modification proposed Mr. King and the
25 Horwoods, however, would reduce costs from previously discussed
26 modifications.
- 27 • WETT will not decide tower placement until a route is selected by the
28 Commission, and will work with landowners to mitigate impacts through tower
29 placement wherever possible.

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

31 **A.** Yes.

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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

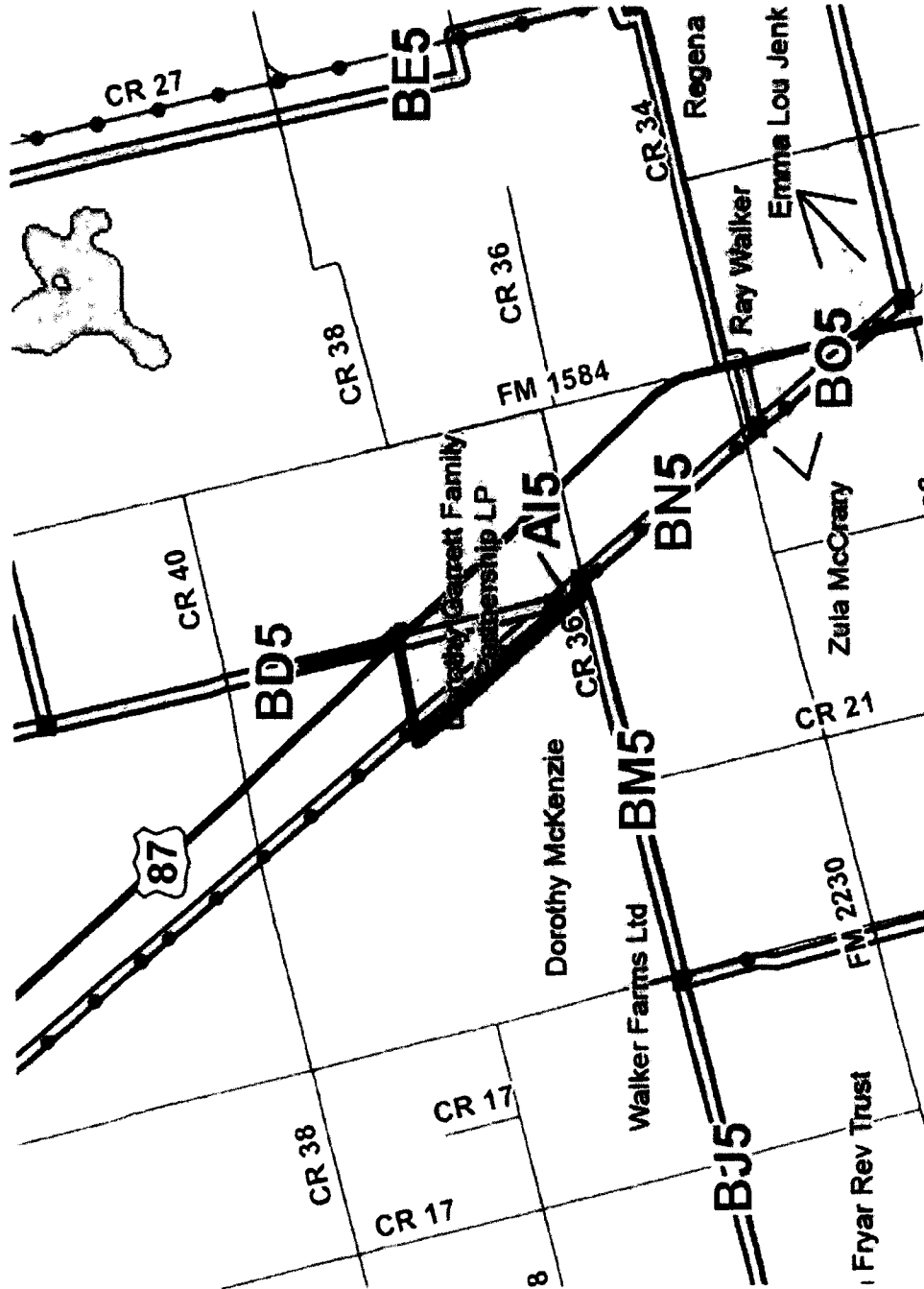
SUBSCRIBED AND SWORN TO BEFORE ME by the said Stan C. Tessmer this 12 day of February, 2011.

Carrie Lynne Marchese
Notary Public, State of Texas

My Commission Expires

06/05/2013





Proposed Modification to BD5 (in Red)

EXHIBIT STR-2

STATEMENT REGARDING STANLEY TESSMER'S WORK PAPERS

Mr. Tessmer reviewed intervenor direct testimony, Ms. Pollio's rebuttal testimony regarding route modifications, and the relevant map exhibits attached to Ms. Pollio's rebuttal testimony, which are all publicly available through the PUC Interchange. He has no additional workpapers.