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DOCKET NO. 58005

APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE LEGEND TO SANDLING 230 KV TRANSMISSION LINE PROJECT IN JEFFERSON COUNTY	**§**	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

DIRECT TESTIMONY

OF

KELECHI K. OSIGWE

ON BEHALF OF

ENTERGY TEXAS, INC.

APRIL 2025

DIRECT TESTIMONY OF KELECHI K. OSIGWE
ENTERGY TEXAS, INC.
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I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Kelechi K. Osigwe. My office is located at 2107 Research Forest Drive, The Woodlands, TX 77380.

Q2. PLEASE STATE HOW YOU ARE EMPLOYED.

A. I am employed by IK POWER System Solutions, Inc, a contractor for Entergy Services, LLC ("ESL"),[1] as a Senior Project Manager of Capital Projects—Transmission. My area of responsibility includes management of new transmission projects for Entergy Texas, Inc. ("ETI" or the "Company").

Q3. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL QUALIFICATIONS AND BUSINESS EXPERIENCE.

A. I graduated from Louisiana State University at Baton Rouge in December 2010 with a Bachelor of Science degree in Electrical Engineering, and from Mississippi State University at Starkville in December 2016 with a Master of Science degree in Electrical and Computer Engineering. I started as a transmission planning engineer in the ESL Transmission Planning organization in October 2011 and held roles in the Project Management group, Transmission Capital Projects group, and Power Delivery group until July 2016. From July 2016 to the present, I held roles at Lower

[1] ESL is an affiliate of the Entergy Operating Companies ("EOCs") that provides engineering, planning, accounting, legal, technical, regulatory, and other administrative support services to each of the EOCs. The EOCs are Entergy Louisiana, LLC, Entergy Arkansas, LLC, Entergy Mississippi, LLC, Entergy New Orleans, LLC, and ETI.

Colorado River Authority as a Senior Project Manager; at Burns & McDonnell as an EPC Project Manager; at POWER Engineers as a Senior Project Manager, and at IK POWER Solutions as a Senior Manager of Capital Projects.

II. PURPOSE OF TESTIMONY

Q4. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my Direct Testimony is to describe the proposed new single-circuit Legend to Sandling 230 kilovolt ("kV") transmission line project in Jefferson County, Texas (the "Project") for which ETI seeks to amend its Certificate of Convenience and Necessity ("CCN") in this docket. I also (1) identify ETI's witnesses and briefly introduce the subject areas addressed in their testimony; (2) describe the ETI Project Team and its functions; (3) describe the Project components, including conductor, structures, right-of-way ("ROW"), and substation; and (4) describe the alternative route development process for the Project. Further, I describe the alternative route ETI believes best addresses the requirements of the Public Utility Regulatory Act ("PURA") and the Commission's Substantive Rules. Finally, I describe how the cost estimates for the Project were developed; identify the affected counties, municipalities, and utilities; and describe the notice that will be provided related to the Project.

Q5. PLEASE IDENTIFY THE OTHER WITNESSES PROVIDING DIRECT TESTIMONY IN THIS CASE.

A. In addition to my testimony, ETI's CCN Application ("Application") is supported by the testimony of the following witnesses:

- **Taylor A. Garvey**, Engineer III of Transmission Planning Department, ESL – Ms. Garvey provides an overview of the Project from a transmission planning perspective, describes the need for the Project, and addresses review of the project by Midcontinent Independent System Operator, Inc. ("MISO").

- **Scott A. Childress**, Project Manager in the Environmental Division of POWER Engineers, Inc. ("POWER") – Mr. Childress discusses the Environmental Assessment and Alternative Route Analysis ("EA") for the Project and identifies and explains the criteria POWER evaluated in the route analysis process.

Q6. WHAT QUESTIONS IN THE APPLICATION ARE YOU SPONSORING?

A. I am sponsoring or cosponsoring in whole or in part the responses to Question Nos. 1 through 13, 17 through 19, and 25 of the Application.

Q7. WHAT APPLICATION ATTACHMENTS ARE YOU SPONSORING?

A. I am sponsoring or co-sponsoring the following Application attachments in whole or in part:

- Application Attachment 2 – Route Cost Estimates
- Application Attachment 3 – Landowner Maps
- Application Attachment 4 – List of Landowners

- Application Attachment 5 – Notice to Landowners (including attachments for Route Segment Descriptions, Notice Maps, Landowners Brochure, Protest Form, and Intervention Form)
- Application Attachment 6 – Notice to Counties/Cities and List of Counties/Cities
- Application Attachment 7 – Notice to Department of Defense Siting Clearinghouse
- Application Attachment 8 – Newspaper Notice Publication and List of Newspapers
- Application Attachment 9 – Notice to Office of Public Utility Counsel
- Application Attachment 10 – Notice to Texas Parks and Wildlife Department

III. OVERVIEW OF THE PROJECT AND PROJECT TEAM

Q8. PLEASE PROVIDE AN OVERVIEW OF THE PROJECT.

A. The Project will include a new single-circuit 230 kV transmission line in Jefferson County, Texas. The proposed transmission line will be routed from the existing Legend 230 kV Substation (located approximately 1.25 miles east of the J.D. Murphree Wildlife Management Area ("WMA") and approximately 0.75 mile southwest of the intersection of State Highway ("SH") 82 and SH 73) to the currently-under-construction Sandling 230 kV Substation (located approximately half a mile west of the intersection of SH 87 and State Park Road). The Sandling 230 kV Substation is expected to be completed in January 2026. The substations

and existing transmission facilities in the area are shown on Figures 1-1 and 2-1 of the EA provided as Attachment 1 to the Application.

As further detailed in the Direct Testimony of ETI witness Taylor A. Garvey, the Project was identified during the 2024 MISO Transmission Expansion Plan ("MTEP24") process. During that process, MISO identified the Project as needed to comply with Electric Reliability Organization (*i.e.*, the North American Electric Reliability Corporation or "NERC") reliability standards for transmission planning.

Q9. PLEASE DESCRIBE THE KEY BENEFITS ETI EXPECTS TO SEE FROM THE PROJECT.

A. As further detailed in the Direct Testimony of Ms. Garvey, key benefits from the Project include:

1. **Supporting customer growth.** The Project will serve to support the area's growing power demands driven by significant commercial and industrial growth.

2. **Enhancing and improving operational reliability.** The Project is necessary to ensure ETI can reliably serve all load, including new load growth during the buildout of other infrastructure in the region. As Ms. Garvey explains, the Project enables ETI to maintain compliance with NERC reliability standards for transmission planning.

Q10. PLEASE DESCRIBE YOUR INVOLVEMENT IN THE PROJECT.

A. As a Senior Project Manager of Capital Projects—Transmission contracted to manage this Project for ETI, I secure the resources and necessary personnel to form the ETI Project Team for the Project. I also monitor team progress and performance throughout the entire life-cycle of the Project, including scoping, construction, and energization.

Q11. PLEASE DESCRIBE THE PROCESS OF DEVELOPING A TRANSMISSION LINE PROJECT FROM YOUR PERSPECTIVE AS PROJECT MANAGER.

A. Once a need is identified, ETI's Technical System Planning group, MISO, and other stakeholders develop a solution to satisfy the identified electrical need. In my role as project manager, I request resources from various departments and form the ETI Project Team to start development of the project plan to execute the solution identified. I also direct a team of subject matter experts to ensure that the Project is completed on time, within budget, and performs as intended. Generally, the ETI Project Team is comprised of individuals with expertise in transmission planning, ROW acquisition, transmission design, electrical engineering and design, distribution asset planning, maintenance, operations, customer service, construction, environmental aspects, legal, and regulatory affairs. The ETI Project Team develops a detailed project execution plan, which defines the scope of work, schedule, cost estimate, and project construction plan. Once the project execution plan is complete, the project is forwarded to executive management for approval.

Q12. WHAT IS THE ESTIMATED SCHEDULE FOR THE PROJECT?

A. The following table provides the projected completion dates for certain Project milestones consistent with the Company's response to Question 8 in the Application.

Estimated Dates of:	Start	Completion
Right-of-way and Land Acquisition	10/06/2025	05/27/2026
Engineering and Design	10/20/2025	07/07/2026
Material and Equipment Procurement	04/01/2024	11/02/2026
Construction of Facilities	08/04/2026	05/02/2027
Energize Facilities	04/23/2027	05/06/2027

IV. PROJECT COMPONENTS

A. Conductors

Q13. PLEASE DESCRIBE THE CONDUCTOR ETI PLANS TO USE FOR THE PROJECT.

A. ETI intends to use 1,272 Thousand Circular Mils ("kcmil") Aluminum Conductor, Steel Supported ("ACSS") "Bittern" conductor with one conductor per phase.

Q14. WHAT IS THE CONTINUOUS SUMMER STATIC CURRENT RATING FOR THE PROJECT?

A. The continuous summer static current rating is 1,957 Amperes ("Amps").

Q15. WHAT IS THE CONTINUOUS SUMMER STATIC LINE CAPACITY AT OPERATING VOLTAGE FOR THE PROJECT?

A. The continuous summer static line capacity at operating voltage is 780 Million Volt Amps ("MVA") at 230 kV.

Q16. WHAT IS THE CONTINUOUS SUMMER STATIC LINE CAPACITY AT DESIGN VOLTAGE?

A. The continuous summer static line capacity at design voltage is 780 MVA at 230 kV.

B. Structures

Q17. PLEASE DESCRIBE THE TYPICAL STRUCTURES THAT WILL BE USED FOR THE PROJECT.

A. The new single-circuit 230 kV transmission line would be supported by steel monopoles for tangent structures and three-pole configurations as needed for turning structures, depending on location.

Q18. WHY DID ETI SELECT THESE STRUCTURE TYPES FOR THE PROJECT?

A. Steel monopoles for tangent structures were selected due to their relatively small footprint compared to H-frame structures (two poles) or four leg steel lattice towers. Steel monopole structures are also easier to engineer and are generally more aesthetically appealing to property owners and require less ROW than the alternatives. For turning structures, three-pole structures were selected to reduce

the ground line overturning moment to reduce foundation sizes for each pole. Depending on the need at a particular point in a proposed route, the typical structures will be one of three types as illustrated in ETI's CCN Application in response to Question No. 5.

C. Right of Way

Q19. PLEASE DESCRIBE THE NEW ROW REQUIRED FOR THE PROJECT.

A. Depending on the route chosen, the necessary new ROW length will range from approximately 8.81 to 9.93 miles. All of the primary alternative routes will require new ROW. The nominal width of the ROW will be 125 feet, which will consist of approximately 62.5 feet on either side of the centerline of the proposed transmission facilities, some of which could overlap with other compatible rights-of-way.

D. Substations

Q20. PLEASE DESCRIBE THE TECHNICAL ASPECTS OF THE WORK TO BE CONDUCTED AT THE SUBSTATIONS ASSOCIATED WITH THE NEW TRANSMISSION LINE.

A. ETI will expand the existing Legend 230 kV Substation to a breaker and half configuration by adding two (2) 230 kV circuit breakers, switches, and relay panels upgrades to the new transmission line node for the 230 kV line to Sandling. At the Sandling 230 kV Substation, ETI will add one (1) 230 kV circuit breaker, switches, and relay panels installations for the new transmission line node for the 230 kV line to Legend Substation.

V. THE PROJECT ROUTING STUDY

Q21. WAS A ROUTING STUDY PREPARED FOR THE PROJECT?

A. Yes. ETI retained POWER, an engineering and environmental consulting firm, to prepare the EA for the Project. As described in more detail in the Direct Testimony of ETI witness Mr. Childress, together with the ETI Project Team, developed and evaluated four primary alternative routes made up of 12 primary alternative route segments.

Q22. PLEASE SUMMARIZE THE ROUTING STUDY PROCESS.

A. As Mr. Childress explains in his Direct Testimony, the routing study was prepared by first selecting the study area based on the Project endpoints and other constraints within the area, identifying and characterizing the existing land use and environmental and cultural resource constraints, and developing route segments and ultimately the alternative routes within the study area. POWER also contacted governmental officials and other stakeholders, whose comments were taken into account in the route development process. A public open house meeting was not held for this project because there are less than 25 directly affected landowners, and as such no public meeting is required. In lieu of a public open house meeting, ETI has been in communication with each of the directly affected landowners regarding this project to incorporate public input in the route development process. Once individual route segments were developed, they were linked to create geographically diverse alternative routes for analysis based on their potential impacts on existing land use and environmental and cultural resources.

Environmental data regarding each of the route segments and routes were compiled in Table 4-1 of the EA. Finally, POWER ranked the alternative routes included in ETI's Application from an environmental, land use, and cultural resource perspective. ETI then considered POWER's ranking along with other factors in its identification of a route that ETI believes best addresses the requirements of PURA and the Commission's Substantive Rules.

Q23. DID ETI HAVE INPUT INTO THE PROJECT'S ROUTING STUDY?

A. Yes. Specifically, ETI participated in the consideration of and decisions related to: (1) the delineation of the study area; (2) the information gathering process from governmental agencies and other stakeholders, including directly affected landowners; (3) the preliminary alternative route segments developed based on those communications; (4) routing adjustments based on landowner input, engineering considerations, land use impacts, and input from governmental agencies and officials; and (5) the primary alternative routes proposed in the Application.

VI. ROUTE BEST ADDRESSING PURA AND COMMISSION ROUTING CRITERIA

Q24. HAS ETI IDENTIFIED A ROUTE THAT IT BELIEVES BEST ADDRESSES THE REQUIREMENTS OF PURA AND THE COMMISSION'S SUBSTANTIVE RULES?

A. Yes. ETI identified Route 2 as the route that ETI believes best addresses the requirements of PURA and the Commission's Substantive Rules. Route 2 is 9.88 miles long and consists of Segments A-B-D-F-H-I-O-Q-S. However, each of the proposed routes contained in ETI's Application is viable, constructible, and addresses the need for the Project. ETI will build the Project using whichever route the Commission selects.

Q25. PLEASE DESCRIBE IN GREATER DETAIL THE EVALUATION PROCESS USED TO IDENTIFY ROUTE 2 AS THE ROUTE THAT BEST ADDRESSES THE REQUIREMENTS OF PURA AND THE COMMISSION'S SUBSTANTIVE RULES.

A. ETI used a consensus process to independently select Route 2 as the primary alternative route that ETI believes best addresses the requirements of PURA and the Commission's Substantive Rules for this Project. ETI reviewed each alternative route and POWER's environmental and land use evaluation and recommendations. This review included the consideration of the factors and criteria listed in PURA and the Commission's Substantive Rules, including potential environmental, cultural, and land use impacts; engineering and construction constraints; reliability

issues; and estimated costs. ETI concluded, after reviewing the results of POWER's routing study and a wide range of factors, including cost, that Route 2 is the route which best overall addresses the requirements of PURA and the Commission's Substantive Rules.

Q26. PLEASE EXPLAIN ETI'S BASIS FOR SELECTING ROUTE 2 AS THE ROUTE BEST ADDRESSING PURA AND THE COMMISSION'S SUBSTANTIVE RULES.

A. ETI's identification of Route 2 as the route that ETI believes best addresses the requirements of PURA and the Commission's Substantive Rules was the product of balancing many factors, including environmental and land use analysis; engineering, design, and construction constraints; costs; community values; and future planning needs. Primary drivers in ETI's selection of Route 2 were constructability, cost, POWER's environmental analysis, prudent avoidance, and input from all directly affected landowners. All routes have the same number of habitable structures within 300 feet of the centerline (at 2). While POWER identified Route 3 as best from an environmental and land use perspective, POWER also concluded that all primary alternative routes were viable from an environmental and land use perspective, that all primary alternative routes share positive attributes, and that the differences among the primary alternative routes are relatively narrow.

Q27. PLEASE DESCRIBE IN GREATER DETAIL THE CHARACTERISTICS OF ROUTE 2 THAT LED THE COMPANY TO IDENTIFY IT AS THE ROUTE THAT BEST ADDRESSES PURA AND THE COMMISSION'S SUBSTANTIVE RULES.

A. First, all four primary alternative routes share certain attributes and characteristics. For example, all four primary alternatives have the same number of habitable structures within 300 feet of the centerline (at 2). Additionally, of the four primary alternative routes:

- None cross over a park/recreational area or over an FM/RM road or have any length of ROW within the visual zone of FM/RM roads;
- None cross land irrigated by traveling systems (rolling or pivot type);
- None are within 20,000 feet of any FAA-registered airfield with a runway more than 3,200 feet in length nor are they within 10,000 feet of any FAA-registered airfield with a runway less than 3,200 feet in length;
- None are within 10,000 feet of a private airstrip, nor are they within 5,000 feet of a heliport;
- None are within 10,000 feet of any commercial AM radio transmitter nor are they within 2,000 feet of any FM radio transmitter, microwave tower, or other electronic installation; None cross upland forest or any known habitat of federally listed endangered or threatened species; and
- None cross or are within 1,000 feet of any cemeteries, recorded historic, archeological resources, or any National Register of Historic Places listed properties.

Key distinguishing attributes in favor of Route 2 include the following:

- Route 2 is estimated to be the least costly of the four alternative routes. In particular, the lowest estimated cost alternative route (including the substation costs) is Route 2 at $87.4 million while the highest estimated cost alternative route is Route 4 at $88.6 million. The estimated cost of each route is identified in Attachment 2 to the Company's Application in this docket.

- Route 2 is tied with Route 1 for having the lowest number of pipeline crossings (15 crossings for Routes 1 and 2 vs 37 crossings for Routes 3 and 4) and is tied with Route 1 for shortest length across pasture/rangeland (0.15 mile vs 0.43 mile for Routes 3 and 4).

- While POWER recommended Route 3 as best from an environmental and land use perspective, ETI identified a potential constructability challenge on Route 3 adjacent to existing storage/evaporation ponds along Segment C that is not reflected in the environmental and land use route comparison scoring. Detailed information was not provided by the landowner, but these storage/evaporation ponds represent an unknown risk to construction and to the estimated construction costs.

- Additionally, the use of Segment C, which is used in Route 3 but not in Route 2, may be subject to conservative operation restrictions from MISO on the existing transmission lines in the Segment C corridor during construction. In particular, Segment C is in the same corridor as existing ETI transmission lines L-829 and L-830, and conservative operation restrictions could be required on some sections of these existing lines during construction in the event of a MISO-issued restriction from storm events. Given this coastal area's general vulnerability to significant storm events, this is a reasonable issue to consider, and the use of Route 2 helps to avoid the possibility of conservative operation restrictions on the existing transmission lines impacting the new Legend – Sandling 230kV transmission line construction.

- Route 2 best reflects and incorporates landowner input.

After reviewing the results of POWER's routing study and a wide range of factors including constructability, cost, and landowner input, ETI concluded that Route 2 presents an appropriate balance of the routing factors and determined there are no negative attributes that could not be addressed with mitigation and the application of best-practice engineering design and construction methods. ETI believes that Route 2 is the route that best addresses the requirements of PURA and the Commission's Substantive Rules regarding certification criteria. Route 2 is a viable and acceptable route from an environmental, land use, and cultural resource

perspective. As such, POWER supports ETI's route selection. However, ETI will construct the line along whichever route or combination of segments that the Commission selects.

VII. ESTIMATED COSTS

Q28. WHAT IS THE ESTIMATED COST RANGE FOR THE PROJECT'S ALTERNATIVE ROUTES?

A. The estimated costs for the four primary alternative routes presented in the Application range from $87,434,420 (for Route 2) to $88,616,692 (for Route 4), including substation work costs. The estimated cost for each primary alternative route (broken down for each route) is provided in Attachment 2 to the Application. These cost estimates include the costs of acquiring the ROW, materials and transportation, engineering, construction, administration, contingency, and other costs, including an allowance for funds used during construction ("AFUDC"), escalation, etc.

Q29. PLEASE DESCRIBE THE BASIS FOR THESE COST ESTIMATES.

A. ETI's transmission cost estimates for the Project were developed by contracting with a construction partner who has experience with marsh terrain construction to develop a construction estimate for four routes. This contractor has constructed similar scope projects for ETI and other EOCs. Additionally, ETI retained experienced design consultants to assist in the development of the technical scope of the substation and transmission line design and material required for the Project.

ETI retained an experienced ROW partner to provide estimates for the required easement for the ROW. Finally, a design partner also performed an independent estimate of the Project, which was used to validate the ETI cost estimate.

Q30. HOW DID ETI DEVELOP THE COST ESTIMATES FOR THE INDIVIDUAL ROUTES?

A. The route costs were developed by accumulating the costs of the component parts of the Project, including engineering, materials and equipment costs, ROW and land acquisition costs, construction labor, and project management costs. The total route cost estimates are not based on per-mile pricing. These components were developed by the ETI Project Team members with subject matter expertise in each of these specific disciplines.

Q31. DO THE ESTIMATED COSTS DISCUSSED ABOVE REFLECT THE ACTUAL PROJECT COSTS?

A. No. These costs are only estimates and are provided for the purpose of evaluating and ranking the routes. Estimates were produced on a comparative basis for that purpose. Once the final route is selected, the final surveying and engineering design can be performed. After both are completed, construction costs can be re-estimated based on the bids received and information gathered. At that time, ETI will update its estimated costs in the Company's monthly transmission construction reports to the Commission. Actual costs for the full Project will be supplied to the

Commission in the monthly transmission construction report after the construction has been completed.

Q32. DO YOU BELIEVE THAT THESE ESTIMATED COSTS ARE REASONABLE?

A. Yes, I believe ETI's estimated costs are reasonable based on experience with projects requiring similar construction activities.

Q33. HOW DOES ETI PLAN TO FINANCE THE PROJECT?

A. It is my understanding that ETI currently plans to finance the construction through a combination of borrowings and equity, either through withholding dividends and/or contributions from ETI's parent.

VIII. AFFECTED COUNTIES, MUNICIPALITIES, AND UTILITIES

Q34. PLEASE IDENTIFY THE COUNTIES IN WHICH THE PROJECT WILL BE LOCATED.

A. All of the primary alternative routes are located in Jefferson County.

Q35. DO ANY OF THE PROPOSED ALTERNATIVE ROUTES CROSS INTO ANY MUNICIPALITIES?

A. Yes. All four primary alternative routes will cross into the city of Port Arthur.

Q36. ARE ANY MUNICIPALITIES LOCATED WITHIN FIVE MILES OF THE PROPOSED ALTERNATIVE ROUTES?

A. Yes, the cities of Port Arthur and Nederland are located within five miles of the proposed alternative routes.

Q37. ARE THERE ANY OTHER CERTIFICATED ELECTRIC UTILITIES LOCATED WITHIN FIVE MILES OF THE PROJECT?

A. No.

Q38. ARE THERE ANY OTHER ELECTRIC UTILITIES INVOLVED WITH THE PROJECT OR DIRECTLY AFFECTED BY IT?

A. There are no other certificated electric utilities involved with the Project or directly affected by it.

IX. NOTICE

Q39. WILL ETI PROVIDE NOTICE OF THE FILING OF ITS APPLICATION WITH THE COMMISSION?

A. Yes. ETI is providing notice of the filing of its Application in accordance with 16 Texas Administrative Code ("TAC") § 22.52. Copies of notice are included as attachments to the Application. Proof of notice will be filed when available.

Q40. WILL THE COMPANY PROVIDE A COPY OF THE EA TO THE TEXAS PARKS AND WILDLIFE DEPARTMENT ("TPWD")?

A. Yes. Pursuant to 16 TAC § 22.52(a)(1)(e), the Company is providing a complete copy of the EA associated with the Project to TPWD. A representative copy of the cover letter sent to TPWD is provided in the Application and an affidavit confirming the EA's transmittal will be provided with the Company's proof of notice. ETI will also provide a copy of the Application to TPWD.

X. CONCLUSION

Q41. PLEASE SUMMARIZE YOUR TESTIMONY.

A. My testimony supports ETI's Application to amend its CCN for the Project. My testimony provides an overview of the Project and an explanation of the Project's components. As a Senior Project Manager of Capital Projects—Transmission, I assembled the ETI Project Team to assist in all aspects of the Project, including developing a detailed project execution plan and managing the Project once construction is underway. POWER evaluated and ranked, and ETI proposed, four primary alternative routes for the Project in the Application using 12 route segments. ETI identified Route 2 as the route it believes best addresses PURA and Commission routing criteria. As discussed above, the estimated costs for the Project are reasonable, and the costs associated with the Project will ultimately depend on the route selected. Finally, my testimony demonstrates that ETI plans to meet the notice requirements in 16 TAC § 22.52.

Q42. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes.