

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

APPLICATION OF PUBLIC SERVICE COMPANY)
OF OKLAHOMA ("PSO") FOR APPROVAL OF)
THE COST RECOVERY OF THE WIND)
CATCHER ENERGY CONNECTION PROJECT; A)
DETERMINATION THERE IS A NEED FOR THE)
PROJECT; APPROVAL FOR FUTURE) CAUSE NO. PUD 201700267
INCLUSION IN BASE RATES COST RECOVERY)
OF PRUDENT COSTS INCURRED BY PSO FOR)
THE PROJECT; APPROVAL OF A TEMPORARY)
COST RECOVERY RIDER; APPROVAL OF)
CERTAIN ACCOUNTING PROCEDURES)
REGARDING FEDERAL PRODUCTION TAX)
CREDITS; WAIVER OF OAC 165:35-38-5(e);)
AND SUCH OTHER RELIEF THE COMMISSION)
DEEMS PSO IS ENTITLED)

REBUTTAL TESTIMONY OF

TIMOTHY B. GAUL

FOR

PUBLIC SERVICE COMPANY OF OKLAHOMA

DECEMBER 22, 2017

FILED
DEC 22 2017
COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

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1 I. INTRODUCTION

2 Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

3 A. My name is Timothy B. Gaul. I am Director of Transmission Line Siting for American
4 Electric Power Company Service Corporation. My business address is 8500 Smiths Mill
5 Road, New Albany, Ohio 43054.

6 Q. WHAT ARE YOUR CURRENT RESPONSIBILITIES?

7 A. As Director of the Siting Department, I lead the team responsible for providing
8 transmission project siting support for projects across AEP's 13 state transmission
9 footprint and our competitive transmission efforts.

10 Q. PLEASE SUMMARIZE YOUR EDUCATION BACKGROUND AND WORK
11 EXPERIENCE.

12 A. I have a Bachelor of Science degree from the State University of New York College of
13 Environmental Science and Forestry in Syracuse, New York and a Master of Science
14 degree from Creighton University, in Omaha, Nebraska. Throughout my career I have
15 supported a range of environmental science and planning studies, and I specialized in
16 planning efforts for infrastructure, environmental impact assessment and modeling,
17 natural resource inventory and permitting, and GIS analysis in support of environmental
18 planning and compliance. Prior to joining AEP, I served as Vice President in the Power
19 and Energy Division at Louis Berger. In that capacity, I provided management and
20 oversight of Transmission Services, GIS Services, and Hydropower Teams. I have
21 served as a siting lead on a number of transmission line projects.

22 Q. HAVE YOU APPEARED AS WITNESS BEFORE THE OKLAHOMA
23 CORPORATION COMMISSION (OCC OR COMMISSION)?

1 A. No, I have not.

2 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN CAUSE NO. PUD
3 201700267 BEFORE THE OCC?

4 A. No, I have not.

5 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE
6 COMMISSIONS ON SITING AND PERMITTING MATTERS?

7 A. Yes, I have provided testimony on siting and permitting matters before the utility
8 commissions of Kansas, Missouri, Illinois, Pennsylvania, Virginia, West Virginia, and
9 New Jersey.

10 II. PURPOSE OF TESTIMONY

11 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

12 A. The purpose of my rebuttal testimony is to respond to positions brought forward by
13 Plains & Eastern Clean Line witness Hurtado. Specifically, my rebuttal testimony will
14 address certain specific requirements of the siting and routing processes, including
15 permitting, in the state of Oklahoma and a discussion of the comparison of the route of
16 Clean Line's Plains & Eastern project to the routing work completed on the Gen-Tie to
17 date.

18

19 III. UNCERTAINTY OF PLAINS AND EASTERN CLEAN LINE
20 PERMITTING PROCESS

21 Q. ON PAGE 12, LINE 1, MR. HURTADO STATES THAT "PLAINS AND EASTERN
22 HAS SECURED ALL NECESSARY ENVIRONMENTAL PERMITS." DO YOU
23 BELIEVE THIS STATEMENT TO REMAIN TRUE IF "AEP-PSO WORK WITH

1 PLAINS AND EASTERN WERE TO EXECUTE THE WIND CATCHER PROJECT”
2 AS STATED ON PAGE 19 OF MR. HURTADO’S TESTIMONY?

3 A. No. It is my understanding based upon public information¹ that Clean Line requested the
4 use of federal powers of eminent domain through an arrangement with the U.S.
5 Department of Energy under Section 1222 of the Energy Policy Act of 2005 for the
6 Plains and Eastern project. This request required the development of an Environmental
7 Impact Statement under the National Environmental Policy Act (NEPA) within which the
8 specific purpose and need for the project, siting considerations, and specific
9 environmental impacts for the Plains and Eastern Clean Line project were assessed and
10 considered in order to receive final approval through a Record of Decision for the Plains
11 and Eastern project.

12 Witness Hurtado has not provided any additional insight or discussion in his
13 responses as to what potential additional permitting requirements and schedule risks may
14 be associated with using a portion of right of way for the Plains and Eastern Clean Line
15 project that was originally acquired for a project that was approved under a different
16 purpose and need, under a different regulatory authority, and potentially, with different
17 permitting requirements. Specifically, it is unclear what additional NEPA process may
18 be required to use portions of the Plains and Eastern project, the scope of any such review
19 (as applicable), what federal and state permits (if any) would be transferrable, and what
20 additional permitting requirements (either under NEPA or otherwise) might be expected
21 if a portion of the Plains and Eastern project were used for the Gen-Tie.

¹ <https://energy.gov/sites/prod/files/2016/03/f30/Clean%20Line%20-%20Participation%20Agreement%20-%20-%20EXECUTED%20VERSION%20%28dated%20March%2025....pdf>.

1 Q. DOES THE PLAINS AND EASTERN CLEAN LINE ROUTE, AS SHOWN IN
2 EXHIBIT "A" TO MR. HURTADO'S RESPONSIVE TESTIMONY, PROVIDE AN
3 INTERCONNECTION TO THE TULSA 345 KV NETWORK?

4 A. No.

5 Q. HOW DOES THE PLAINS AND EASTERN CLEAN LINE ROUTE COMPARE TO
6 THE GEN-TIE LINE'S ASSUMED 380-MILE ROUTE IN THE EPC CONTRACT?

7 A. Although the Plains and Eastern route provided in Mr. Hurtado's Exhibit is scaled at a
8 very high level with very few geographic boundaries or demarcations, it appears that the
9 Plains and Eastern route would add additional mileage to the Gen-Tie. Based upon a
10 review of this limited information provided by witness Hurtado compared to the routing
11 work completed on the Gen-Tie to date, it is my estimate that use of the Plains and
12 Eastern route for the Wind Catcher Project could surpass 380 miles, which is the assumed
13 line length in the Company's EPC Contract. A specific mileage comparison would
14 depend upon both the length to connect to the Tulsa area 345 kV transmission network
15 and the length to connect the Twin Counties substation to the Plains and Eastern right of
16 way, as it may exist.

17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

18 A. Yes.