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June 4, 2019

VIA ELECTRONIC FILING

Mr. Joel H. Peck, Clerk
Document Control Center
State Corporation Commission
1300 East Main Street - 1st Floor
Richmond, VA 23219

**Re: Application of Virginia Electric and Power Company
For approval and certification of electric facilities:
Potomac Yards Undergrounding and Glebe GIS Conversion
Case No. PUR-2019-00040**

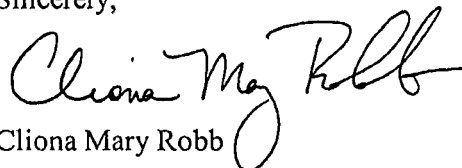
Dear Mr. Peck:

On behalf of City of Alexandria, please find enclosed for filing the *Direct Testimony of Heather Diez, Jeffrey Farner, and Carl W. Eger, III*, together with a certificate of service, in the above referenced matter.

This filing is being submitted electronically, pursuant to the Commission's electronic document filing system. The Commission's acknowledgment of this filing should be emailed to me at crobb@cblaw.com.

Please contact me if you have any questions about this filing. Thank you for your assistance.

Sincerely,



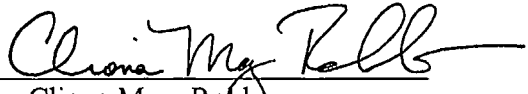
Cliona Mary Robb

Enclosure

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the *Direct Testimony of Heather Diez, Jeffrey Farner, and Carl W. Eger, III* was hand-delivered, emailed, and/or mailed, first-class postage prepaid, to the parties below on this 4th day of June 2019.


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COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC AND POWER
COMPANY

CASE NO. PUR-2019-00040

For approval and certification of electric
facilities: Potomac Yards Undergrounding
and Glebe GIS Conversion

DIRECT PRE-FILED TESTIMONY OF

HEATHER DIEZ

ON BEHALF OF

THE CITY OF ALEXANDRIA, VIRGINIA

JUNE 4, 2019

DIRECT TESTIMONY SUMMARY

Heather Diez is the Deputy Director of Development and Right of Way for the City of Alexandria's Department of Transportation & Environmental Services ("Department"), which oversees work being conducted within the City's right-of-way, including but not limited to, public and private development, utility work, excavations, reserved parking, maintenance of traffic, and other impacts to the right-of-way to ensure safe access, construction, and restoration.

Her testimony addresses the environmental mitigation measures set forth in the report submitted by the Virginia Department of Environmental Quality on May 1, 2019 regarding the Project proposed by Virginia Electric and Power Company .

Her testimony also stresses the importance of taking Route 1 traffic flows into account during construction of the Project, emphasizing the volume of traffic on Route 1 and the important role Route 1 plays in in facilitating traffic flows for not only members of the Alexandria and Arlington County communities, but also to those throughout Northern Virginia for daily commuting and other purposes.

1 I. INTRODUCTION

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

3 A. My name is Heather Diez. My business address is 301 King Street, Alexandria,
4 VA 22314. I am employed as the Deputy Director of Development and Right of
5 Way for the City of Alexandria's Department of Transportation & Environmental
6 Services ("Department"), a position which I have held since August 2018.

7 Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

8
9 A. I am testifying on behalf of the City of Alexandria regarding the Application of
10 Virginia Electric and Power Company for approval and certification of the
11 Potomac Yards Undergrounding and Glebe GIS Conversion ("Project").

12 Q. PLEASE DESCRIBE YOUR ROLE AND PROFESSIONAL EXPERIENCE.

13 A. I am responsible for a team of professional plan reviewers, permit technicians,
14 inspectors, and surveyors. We represent the Department's position on work
15 being conducted within the City's right-of-way, including but not limited to,
16 public and private development, utility work, excavations, reserved parking,
17 maintenance of traffic, and other impacts to the right-of-way to ensure safe
18 access, construction, and restoration.

19 Q. WHAT IS YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE?

20 A. I hold a Bachelor of Science in Civil Engineering, a Master's in Public
21 Administration, and a Graduate Certificate in Local Government Management
22 from the Virginia Polytechnic and State University in Blacksburg, Virginia. I am a

1 registered Professional Engineer in the Commonwealth of Virginia. I began
2 serving the City of Alexandria in April 2018. Prior to working here, I have held
3 positions in public and private industry for more than 20 years in Colorado,
4 California, and Virginia

5 **Q. HAVE YOU EVER TESTIFIED BEFORE THE VIRGINIA STATE CORPORATION**
6 **COMMISSION OR ANY OTHER UTILITY REGULATORY AGENCY OR LEGISLATIVE**
7 **BODY?**

8 A. I have not testified before the Virginia State Corporation Commission. I have on
9 numerous occasions made presentations to various local boards and local and
10 regional commissions. These include presentations to the Fairfax County Board
11 of Supervisors and also the City of Alexandria Planning Commission and Council
12 regarding work being conducted within rights of way addressing impacts to
13 ensure safe access, construction, and restoration development.

14 **II. PURPOSE OF TESTIMONY AND SUMMARY OF RECOMMENDATIONS**

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

17 A. The purpose of my testimony is to first address the environmental mitigation
18 measures set forth in the report submitted by the Virginia Department of
19 Environmental Quality ("DEQ") on May 1, 2019 in this proceeding regarding the
20 Project and then to stress the importance of taking Route 1 traffic flows into
21 account during construction of the Project.

22 **Q. DO YOU SPONSOR ANY EXHIBITS?**
23

1 A. Yes. I sponsor one exhibit: the City's letter to DEQ, which is enclosed with this
2 testimony as Exhibit HD-1.

3 **III. ENVIRONMENTAL MITIGATION**

4
5 **Q. DID THE CITY OF ALEXANDRIA SUBMIT A LETTER TO DEQ PROVIDING**
6 **COMMENTS TO INFORM THE ENVIRONMENTAL IMPACT REVIEW?**

7
8 A. Yes.

9 **Q. CAN YOU PROVIDE A COPY OF THAT LETTER?**

10

11 A. Yes: the letter submitted by the City to DEQ is enclosed as Exhibit HD-1 to the
12 testimony.

13 **Q. HAVE YOU READ DEQ'S COMMENTS REGARDING PUR-2019-00040 POTOMAC**
14 **YARDS UNDERGROUNDING AND GLEBE GIS CONVERSION REVIEWED UNDER**
15 **DEQ#19-0265?**

16

17 A. Yes.

18 **Q. DO YOU AGREE WITH THE LIST OF PERMITS OR APPROVALS DEQ IDENTIFIES AS**
19 **LIKELY NECESSARY AS PREREQUISITES TO PROJECT CONSTRUCTION?**

20 A. Yes, to the best of my understanding these are the permits or approvals likely
21 necessary as prerequisites to project construction

22 **Q. DO YOU AGREE WITH THE SUMMARY OF FINDINGS AND RECOMMENDATIONS**
23 **THAT DEQ IDENTIFIES?**

24 A. Yes. To the extent of DEQ's review, I agree with DEQ's summary of findings and
25 recommendations. In particular, I would like to emphasize Subsection 17
26 regarding Local Participation, which provides an overview of the City of

1 Alexandria's comments, and outlines the City's Requirements and
2 Recommendations. I take this opportunity to reiterate the City's requirements:

- 3 • Submission of a water quality impact assessment will be required for any
4 disturbance within the RPA;
- 5 • Per DEQ Guidance Memo No. 15-2003, Linear projects consisting of
6 underground or above ground utilities that will not result in significant
7 changes to the predevelopment runoff characteristics of the land surface
8 after the completion of construction and final stabilization may receive a
9 waiver from the post-construction stormwater requirements and the
10 preparation and implementation of a stormwater management plan;
- 11 • Dominion will need to coordinate with the City regarding any permitting
12 needed for VMRC or US Army Corps of Engineers on City property.

13 Moreover, I take this opportunity to reiterate the City's recommendation that a
14 detailed plan be submitted that:

- 15 • Reflects the Cities concerns about the impacts to the Four Mile Run
16 streambank. As such, the City recommends that Dominion provide a
17 detailed plan that shows the impacts to the Four Mile Run streambank,
18 more information on the plan to restore the streambanks and substation
19 site, and a cross section of the proposed line and width of easement to
20 determine if the Project will impact either the planned streetscape on

1 Route 1 or the planned development for this portion of North Potomac
2 Yard.

3 • Provides information on future easements surrounding the Four Mile Run
4 streambank to evaluate the impacts on planned open space, including:

- 5 • Where will there be a need for permanent access?
- 6 • What can be placed on top of the easement. For example, can
7 trails, trees, and vegetation be placed over or around the buried
8 line? What are the limitations?

9 • Reflects the City's concerns about the impact to the Four Mile Run trail
10 during construction due to the proximity of the Project to the trail area.

11 The City recommends that Dominion provides more information on the
12 impact to the Four Mile Run trail, any necessary detour and staging
13 operations, and inclusion of appropriate erosion and sediment control
14 measures in place.

15 **Q. DO YOU HAVE ANYTHING TO ADD TO THE CONSIDERATIONS LISTED ABOVE?**

16 **A.** Yes. I want to inform the Commission that the City will conduct further detailed
17 review and evaluation after the Commission approves Dominion's application
18 and Dominion has submitted final plans to the City for construction of the
19 project.

20 **Q. DO YOU HAVE ANY FURTHER COMMENTS REGARDING THE PROJECT'S**
21 **MITIGATION OF ENVIRONMENTAL IMPACT TO THE PROJECT AREA?**

1 A. Yes. While DEQ provided a full review of the Project scope and provided
2 determination on environmental impact and environmental mitigation
3 measures, I take this opportunity to reiterate and emphasize the City of
4 Alexandria's comments regarding environmental mitigation in the project area.

5 Specifically, the City of Alexandria recommends:

- 6 • Dominion Energy comply with all State and Local Stormwater
7 Management ordinances and requirements:
 - 8 • Submission of a water quality impact assessment will be
9 required for any disturbance within the Resource Protection
10 Area (RPA).
 - 11 • Per VDEQ Guidance Memo No. 15-2003, Linear projects
12 consisting of underground or above ground utilities that will not
13 result in significant changes to the pre-development runoff
14 characteristics of the land surface after the completion of
15 construction and final stabilization may receive a waiver from
16 the post-construction stormwater requirements and the
17 preparation and implementation of a stormwater management
18 plan.
 - 19 • As necessary, Dominion will need to coordinate with the City
20 regarding any permitting needed for Virginia Marine Restoration

1 Commission ("VMRC") or United States Army Corps of Engineers
2 ("USACE") on City property.

3 **IV. TRAFFIC MANAGEMENT AND CONSTRUCTION**

4
5 **Q. DO YOU HAVE ANY OBSERVATIONS REGARDING THE PROJECT'S**
6 **IMPLEMENTATION AND IMPACTS TO TRANSPORTATION FLOWS?**

7
8 **A.** Yes, I have several observations concerning the daily traffic flows along Route 1
9 in the City of Alexandria and Arlington County in the vicinity of the Project.

10 **Q. WHAT ARE YOUR OBSERVATIONS?**

11 **A.** According to Virginia Department of Transportation ("VDOT") data for traffic
12 flows reflecting Route 1 in the area of the Project, average annual weekday
13 traffic is about 47,000 vehicles with peak traffic flows occurring weekdays
14 between 7:30am to 8:30am in the northbound direction and 4:30pm to 5:30pm
15 in the southbound direction. Route 1 serves an important role in facilitating
16 traffic flows for not only members of the Alexandria and Arlington County
17 communities, but also to those throughout Northern Virginia for daily
18 commuting and other purposes.

19 **Q. HAVE YOU REVIEWED TESTIMONY BY COMPANY WITNESS MULLIGAN?**

20 **A.** Yes.

21 **Q. DO YOU HAVE ANY COMMENTS REGARDING THE PROJECT'S CONSTRUCTION**
22 **TECHNIQUES?**

23 **A.** I am not an expert on the benefits and trade-offs of the various construction
24 techniques identified in the Company's application. However, I wish to

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1 acknowledge that certain construction methods may have lesser impact on
2 overall transportation flows and stream impacts as compared to others. The City
3 of Alexandria advocates that construction methods be used that seek to
4 minimize the overall disruption to the community, including transportation flows
5 or the disruption of public right of way and the Four Mile Run stream area.

6 **Q. DOES THIS COMPLETE YOUR DIRECT PREFILED TESTIMONY?**

7 **A. Yes.**

Exhibit HD-1

City of Alexandria Response to DEQ



DEPARTMENT OF TRANSPORTATION
AND ENVIRONMENTAL SERVICES

P.O. Box 178 - City Hall
Alexandria, Virginia 22313
703-746-4025

130510003

130610085

April 12, 2019

Ms. Janine Howard
Department of Environmental Quality
Office of Environmental Impact Review
1111 East Main Street
Richmond, VA 23219

Re: Potomac Yards Undergrounding and Glebe GIS Conversion
Dominion – PUR-2019-000040, Application No. 291
DEQ#19-026S

Dear Ms. Howard:

Thank you for giving the City of Alexandria the opportunity to provide comments on this project.
We have the following comments:

1. Dominion Energy (Dominion) will have to comply with all State and Local Stormwater Management ordinances and requirements:
 - a. Submission of a water quality impact assessment will be required for any disturbance within the RPA. Please submit the water quality impact assessment to Melanie Mason at: Melanie.Mason@alexandriava.gov.
 - b. Per VDEQ Guidance Memo No. 15-2003, Linear projects consisting of underground or above ground utilities that will not result in significant changes to the predevelopment runoff characteristics of the land surface after the completion of construction and final stabilization may receive a waiver from the post-construction stormwater requirements and the preparation and implementation of a stormwater management plan.
 - c. Dominion will need to coordinate with the City regarding any permitting needed for VMRC/USACE on City property, if necessary.
2. The City is concerned about the impacts to the Four Mile Run Streambank. The City recommends that Dominion provides a detailed plan that shows the impacts to the Four Mile Run Streambank, more information on the plan to restore the streambanks and substation site and a cross section of the proposed line and width of easement to determine if the proposal will impact the planned streetscape on Route 1 and the planned development for this portion of North Potomac Yard.

Ms. Janine Howard
April 12, 2019
Page 2

3. We recommend that Dominion provides information on future easements surrounding the streambank to evaluate the impacts on the planned open space, including:
 - a. Where will there be a need for permanent access?
 - b. What can be placed on top of the easement - can trails, trees, and vegetation be placed over or around the buried line? What are the limitations?
4. The City is concerned about the impact to the Four Mile Run trail during construction due to the proximity of the project to the Run. The City recommends that Dominion provides more information on the trail impact, detour and staging operations during construction with appropriate erosion and sediment control measures in place.
5. The City recommends that Dominion identifies and addresses any transportation impacts.
6. The City recommends that Dominion coordinates with the Northern Virginia Regional Commission (NVRC), Arlington County and the City on the Four Mile Run Restoration Project and outreach to the surrounding Community and Civic Associations: Potomac Yard Civic Association, Lynhaven, Arlandria and Del Ray Civic Associations.
7. The City finds that the removal of the terminal station and overhead lines is consistent with the intent and recommendations of the North Potomac Yard Small Area Plan.
8. Further detailed review and evaluation will be conducted when final plans are submitted to the City for construction.

If you have any further questions or need clarification, please do not hesitate to contact me at 703.746.4065.

Sincerely,



William Skrabak, Deputy Director
Transportation & Environmental Services

- cc: Yon Lambert, AICP, Director, Transportation and Environmental Services
 Heather Diez, PE, Deputy Director, Transportation & Environmental Services
 Bill Eger, PE, Energy Manager, General Services
 Jeffrey Farmer, Deputy Director, Planning & Zoning
 Karen Snow, City Attorney's Office
 Jack Browand, Division Chief, Recreation, Parks & Cultural Activities

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC AND POWER
COMPANY

CASE NO. PUR-2019-00040

For approval and certification of electric
facilities: Potomac Yards Undergrounding
and Glebe GIS Conversion

DIRECT PRE-FILED TESTIMONY OF
JEFFREY FARNER
ON BEHALF OF
THE CITY OF ALEXANDRIA, VIRGINIA

JUNE 4, 2019

DIRECT TESTIMONY SUMMARY

Mr. Farner recommends that the Commission approve the Project and direct Virginia Electric and Power Company d/b/a Dominion Energy Virginia ("Dominion") to work with the City regarding steps needed to implement the relocation of the Potomac Yards Station, including an extension of the Special Use Permit ("SUP").

This relocation will enable implementation of the North Potomac Yard Small Area Plan and the Four Mile Run Master Plan and Design Guidelines for this important redevelopment site for the City and the region. This is situated in an important gateway to the City of Alexandria that is one of the City's most important redevelopment areas. The planned mix of land uses and density due to the planned Metrorail station, as well as the proximity to Four Mile Run stream ("Four Mile Run"), result in the location of the Potomac Yards Station being an important open space for the planned development in the Potomac Yards area. The 70-acre North Potomac Yard site is one of the larger redevelopment sites in the City and the only large redevelopment site in close proximity to National Airport. This location is the closest in the City to Washington, D.C. and is part of the growing urban neighborhood of Pentagon City-Crystal City-Potomac Yard, recently dubbed "National Landing" for the successful bid to attract Amazon's HQ2. The location along an existing Metrorail line also gives this area a strong rationale for redevelopment.

The critical nature of this site is demonstrated by the City's efforts concerning this area. The City worked extensively with Arlington County to jointly develop the Four Mile Run Restoration Master Plan and Design Guidelines ("Four Mile Run Master Plan"), which was adopted by both localities in 2016. In 2008, the City adopted a Transportation Master Plan that resulted in the City approving in 2010 the North Potomac Yards Small Area Plan ("North Potomac Yards SAP"), which is an element of the City-wide Master Plan and established the vision, land use parameters, infrastructure and open space for this portion of Potomac Yard. In addition, the City has approved the Coordinated Development District ("CDD") Zoning; the CDD zoning and associated special use permit approval(s) are the zoning requirements that implement the vision of the North Potomac Yard SAP and establish the implementation for infrastructure.

The City has expended significant resources to transform Richmond Highway and North Potomac Yard through implementation of a dedicated transit corridor and a new Metrorail station. The small area plan envisions North Potomac Yard as an environmentally and economically sustainable and diverse 21st century urban, walkable, transit-oriented, mixed-use community that completes a vital link in the open space and transit networks in the City.

Consequently, one of the conditions of the SUP is that Dominion is responsible for relocating the Potomac Yards Station and all necessary terminal facility equipment by January 1, 2021. Mr. Farner notes that Dominion will need to apply for an extension of the SUP, prior to the expiration of the SUP on January 1, 2021, if implementation of the Project results in the relocation of the Potomac Yards North Terminal Station not being completed by January 1, 2021.

1 I. INTRODUCTION

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

3 My name is Jeffrey Farner. My business address is 301 King Street, Suite 2100,
4 Alexandria, Virginia 22314. I am employed as the Deputy Director of Planning
5 and Zoning for the City of Alexandria, Virginia.

6 Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

7
8 A. I am testifying on behalf of the City of Alexandria regarding the Application of
9 Virginia Electric and Power Company for approval and certification of the
10 Potomac Yards Undergrounding and Glebe GIS Conversion ("Project").

11 Q. PLEASE DESCRIBE YOUR ROLE AND PROFESSIONAL EXPERIENCE.

12 A. I have more than twenty two years of planning, urban design, and development
13 experience in both the public and private sectors. For the past nineteen years, I
14 have been responsible for overseeing new urban development and larger, more
15 complex planning and urban design projects in the City of Alexandria.
16 Alexandria is used as a model for new urbanism infill development and historic
17 preservation and has experienced considerable redevelopment and population
18 growth throughout the past decade. I have overseen and managed
19 approximately 200 large scale development projects and 20 master plan
20 amendments and plans, including those involving brownfield and
21 redevelopment projects such as North Potomac Yard. Other recent projects I

1 have worked on include a soon to be constructed Metro rail station, the
2 Beauregard Small Area Plan, the Eisenhower East and West Small Area Plans,
3 and the Oakville Triangle and Route 1 West Corridor Plan. My involvement with
4 these projects encompassed plan preparation, development of urban design
5 standards and guidelines, and implementation strategies for major
6 infrastructure. I have also worked extensively with numerous stakeholders,
7 including the development community, various boards and commissions, and
8 diverse neighborhood citizen groups.

9 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

10 A. In 1992 I received a B.A. in Environmental Studies and Planning from
11 Shippensburg University in Shippensburg, Pennsylvania. In 1995 I received an
12 M.S. in Land Use Studies from Shippensburg University.

13 **Q. HAVE YOU EVER TESTIFIED BEFORE THE VIRGINIA STATE CORPORATION**
14 **COMMISSION OR ANY OTHER UTILITY REGULATORY AGENCY OR LEGISLATIVE**
15 **BODY?**

16 A. I have not testified previously before the Virginia State Corporation Commission.
17 I have on numerous occasions conducted presentations regarding zoning
18 matters before the Alexandria City Council. I have on numerous occasions made
19 presentations regarding development, zoning and long range planning proposals
20 before the Alexandria Planning Commission and City Council. I am normally
21 responsible for presenting and appearing before the Alexandria Planning
22 Commission and City Council, nearly every month at their regular public hearing.

1 I am also responsible for presenting to various local boards and commissions
2 such as the Washington Council of Governments, National Capital Planning
3 Commission, Fine Arts Commission and the Board of Architectural Review.

4 **II. PURPOSE OF TESTIMONY AND SUMMARY OF RECOMMENDATIONS**

5
6 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

7 A. The purpose of my testimony is demonstrate the significance of the relocation of
8 the Potomac Yards North Terminal Station (“Potomac Yards Station”) to the
9 development of the North Potomac Yards area in the City of Alexandria and to
10 explain the status of Special Use Permit #2011-014, which contemplates such
11 relocation.

12 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION?**

13
14 A. I recommend that the Commission approve the Application and direct Virginia
15 Electric and Power Company d/b/a Dominion Energy Virginia (“Dominion”) to
16 work with the City regarding steps needed to implement the relocation of the
17 Potomac Yards Station, including an extension of the Special Use Permit. This
18 relocation will enable implementation of the North Potomac Yard Small Area
19 Plan and the Four Mile Run Master Plan and Design Guidelines for this important
20 redevelopment site for the City and the region.

21

- 1 **III. SIGNIFICANCE OF RELOCATION OF POTOMAC YARDS STATION**
2
- 3 **Q. HOW DOES THE RELOCATION OF THE POTOMAC YARDS STATION IMPACT THE**
4 **CITY OF ALEXANDRIA?**
- 5 A. The facility is at the northern entrance to the City and is at the physical and
6 visual entrance to an important redevelopment site for the City. The relocation
7 of the facility, situated in an important gateway to the City of Alexandria, is
8 critical to the development and public planning of the City because the location
9 of the Potomac Yards Station is one of the City's most important redevelopment
10 areas. The planned mix of land uses and density due to the planned Metrorail
11 station, as well as the proximity to Four Mile Run stream ("Four Mile Run"),
12 result in the location of the Potomac Yards Station being an important open
13 space for the planned development in the Potomac Yards area.
- 14 **Q. CAN YOU PROVIDE EXAMPLES THAT DEMONSTRATE THE MAGNITUDE OF THE**
15 **CITY'S EFFORTS REGARDING THE POTOMAC YARDS STATION AREA?**
16
- 17 A. Yes. The City worked extensively with Arlington County to jointly develop the
18 Four Mile Run Restoration Master Plan and Design Guidelines ("Four Mile Run
19 Master Plan"), which was adopted by both localities in 2016. In 2008, the City
20 adopted a Transportation Master Plan that resulted in the City approving in 2010
21 the North Potomac Yards Small Area Plan ("North Potomac Yards SAP"), which is
22 an element of the City-wide Master Plan and established the vision, land use
23 parameters, infrastructure and open space for this portion of Potomac Yard.

1 In addition, the City has approved the Coordinated Development District ("CDD")
2 Zoning; the CDD zoning and associated special use permit approval(s) are the
3 zoning requirements that implement the vision of the North Potomac Yard small
4 area plan and establish the implementation for infrastructure. The City has
5 expended significant resources to transform Richmond Highway and North
6 Potomac Yard through implementation of a dedicated transit corridor and a new
7 Metrorail station. The North Potomac Yard small area plan and CDD #19 can be
8 found on the City's website at alexandriava.gov/Potomac Yard Plan. The small
9 area plan envisions North Potomac Yard as an environmentally and economically
10 sustainable and diverse 21st century urban, walkable, transit-oriented, mixed-use
11 community that completes a vital link in the open space and transit networks in
12 the city.

13 **Q. WHAT IS YOUR INVOLVEMENT WITH THE POTOMAC YARDS STATION?**

14 **A.** I have participated in the preparation of the Four Mile Run Master Plan and
15 served as the lead planner on the North Potomac Yards SAP.

16 **Q. PLEASE DESCRIBE HOW THE FOUR MILE RUN MASTER PLAN RELATES TO THE**
17 **RELOCATION OF THE POTOMAC YARDS STATION.**

18 **A.** The goal of the Four Mile Run Master Plan is to ecologically and aesthetically
19 improve the Four Mile Run. This plan also calls for transforming Four Mile Run's
20 adjacent open space areas into functional recreational and environmental
21 destinations, in contrast with the former utilitarian or industrial uses of many of

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1 these areas. As such, the Four Mile Run Master Plan recommends “the
2 undergrounding of the high voltage electrical transmission lines that currently
3 occupy, and visually dominant the corridor...” The Potomac Yard is a 225 -acre
4 former railyard switching yard and brownfield site located in the northeast area
5 of the City, immediately south of downtown Washington, D.C. and Ronald
6 Reagan Washington National Airport. The Potomac Yard area is planned to
7 convert from its industrial heritage to a mixed use transit-oriented development.
8 The removal of the industrial nature of the 230KV lines will be consistent with
9 the on-going transformation of this area. The North Potomac Yard and Potomac
10 Yard Small Area Plan establish the vision and development parameter of
11 Potomac Yard.

12 **Q. PLEASE DESCRIBE HOW THE NORTH POTOMAC YARDS SAP RELATES TO THE**
13 **RELOCATION OF THE POTOMAC YARDS STATION.**

14 **A.** The North Potomac Yards SAP and related approvals, including the CDD zoning,
15 build on the Four Mile Run Restoration Master Plan, requiring a 2.3 acre
16 Crescent Park adjacent to Four Mile Run as well as other improvements next to
17 Four Mile Run intended to provide a wide range of opportunities for active and
18 passive open space. Together, the Four Mile Run Master Plan and the North
19 Potomac Yard approvals provide open space amenities along both sides of Four
20 Mile Run and emphasize the valuable ecological and urban assets the area has to
21 offer. Removal of the Potomac Yards Station is consistent with the intent of the

1 North Potomac Yard SAP to provide improved open space and enhance the
2 visual quality of this gateway entrance to the City, adjacent to Four Mile Run.
3 Removal of the Potomac Yards Station would eliminate the overhead lines,
4 remove the facility from the resource protection area (RPA) and remove this
5 structure from the middle of the 3.5 acres of open space planned adjacent to
6 Four Mile Run.

7 **Q. PLEASE DESCRIBE GENERALLY HOW THE RELOCATION OF THE POTOMAC YARDS**
8 **STATION RELATES TO THE OVERALL REDEVELOPMENT IN THIS AREA OF THE**
9 **CITY.**

10
11 **A.** The 70-acre North Potomac Yard site is one of the larger redevelopment sites in
12 the City and the only large redevelopment site in close proximity to National
13 Airport. This location is the closest in the City to Washington, D.C. and is part of
14 the growing urban neighborhood of Pentagon City-Crystal City-Potomac Yard,
15 recently dubbed "National Landing" for the successful bid to attract Amazon's
16 HQ2. The location along an existing Metrorail line also gives this area a strong
17 rationale for redevelopment.

18 **Q. WHY IS PROXIMITY TO A METRORAIL LINE SIGNIFICANT?**

19
20 **A.** For more than a decade, the Washington region has worked together to steer
21 new development to areas well-served by existing transit and areas that can be
22 served by future high-capacity transit. Through the Metropolitan Washington
23 Council of Governments (MWCOG), the region has modelled future growth
24 scenarios and determined that concentrating future growth into "regional

1 activity centers” that can be well-served by high capacity transit is essential to
2 the region’s future. In 2008, the City of Alexandria adopted a Transportation
3 Master Plan which established high capacity transit corridors so that the City
4 could absorb its share of the region’s growth in a way that wouldn’t overwhelm
5 the transportation network. Since then, the City has adopted Small Area Plans
6 (SAP) that maximize the potential development in every location along that
7 growth crescent.

8 **Q. HOW DOES THE NORTH POTOMAC YARDS SAP MAXIMIZE THE POTENTIAL**
9 **DEVELOPMENT OF THE GROWTH CRESCENT?**

10
11 **A.** It envisions the North Potomac Yards area as an environmentally and
12 economically sustainable and diverse 21st century urban, walkable, transit-
13 oriented, mixed-use community that completes a vital link in the open space and
14 transit networks in the City. The land use strategy of the North Potomac Yards
15 SAP is fundamentally based on proximity to the Metrorail station, high-capacity
16 transit and market conditions. The North Potomac Yards SAP emphasizes a
17 balanced mix of uses overall, while concentrating office uses near the Metrorail
18 station to make the sites attractive to potential tenants and maximize transit use
19 by workers.

20 A fundamental premise of North Potomac Yard SAP is to integrate a Metrorail
21 station within the site to maximize ridership. By integrating the Metrorail station
22 immediately adjacent to the planned development, it integrates land use and

1 transportation while also creating a safe and attractive access to the future
2 Metrorail station.

3 **Q. WHAT IS THE IMPACT OF THE EXISTING TRANSMISSION LINES ON THE NORTH**
4 **POTOMAC YARDS SAP?**

5
6 The three poles that cross Route 1 and Four Mile Run range in height from
7 approximately 100 feet to 130 feet, and the structures within the Potomac Yards
8 Station range from 180 feet to 250, which is incompatible with the residential
9 uses, height and proximity of the adjoining planned buildings. While this area
10 was historically industrial and commercial, the poles and Potomac Yards Station
11 structures are not consistent with the planned urban mixed used development
12 and urban scale buildings in North Potomac Yard SAP.

13 **Q. WHAT IS YOUR OVERALL CONCLUSION?**

14 **A.** The retention of the aerial poles and terminal station would be contrary to the
15 vision for the North Potomac Yards SAP, would negatively impact the planned
16 redevelopment, and would negatively impact the intended uses of this area as a
17 future public park.

18 **Q. ARE ELEMENTS OF THE VISION FOR THE NORTH POTOMAC YARDS SAP BEING**
19 **IMPEMENTED NOW?**

20 **A.** Yes. Millions of dollars have been spent to transform a portion of Richmond
21 Highway. The City itself has spent considerable sums for the design and
22 implementation of the Metrorail station, including a Metrorail Feasibility Report
23 and Environmental Impact Statement. The \$ 370 million Potomac Yard Metrorail

1 station is now under construction. This area of Four Mile Run is an important
2 open space resource to serve the significant amount of additional residents and
3 employees. The planned development for the area encompassing North
4 Potomac Yard will generate over 10, 000 new residents and 9,000 additional
5 employees. The North Potomac Yard envisions a network of connected open
6 space to serve the new residents.

7 **IV. STATUS OF SPECIAL USE PERMIT**

8
9 **Q. WHAT IS YOUR INVOLVEMENT WITH THE SPECIAL USE PERMIT?**

10 A. I was the lead person on Special Use Permit #2011-0014 for the Potomac Yards
11 terminal station that was approved by Alexandria's City Council on October 18,
12 2014 ("SUP").

13 **Q. HOW IS THE SUP RELEVANT TO DOMINION'S APPLICATION IN THIS**
14 **PROCEEDING?**

15
16 A. One of the conditions of the SUP is that Dominion is responsible for relocating
17 the Potomac Yards Station and all necessary terminal facility equipment by
18 January 1, 2021.

19 **Q. ARE YOU AWARE THAT DOMINION'S APPLICATION CONTEMPLATES AN IN-**
20 **SERVICE DATE FOR THE PROJECT OF MAY 2022?**

21
22 A. Yes.

23 **Q. WHAT IS THE CITY'S POSITION CONCERNING THE SUP EXPIRING ON JANUARY 1,**
24 **2021 YET THE IN-SERVICE DATE FOR THE PROJECT BEING MAY 2022?**

25

1 A. Dominion will need to apply for an extension of the SUP, prior to the expiration
2 of the SUP on January 1, 2021.

3 Q. **DOES THIS COMPLETE YOUR DIRECT PREFILED TESTIMONY?**

4 A. Yes.

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC AND POWER
COMPANY

CASE NO. PUR-2019-00040

For approval and certification of electric
facilities: Potomac Yards Undergrounding
and Glebe GIS Conversion

DIRECT PRE-FILED TESTIMONY OF

CARL W. EGER, III

ON BEHALF OF

THE CITY OF ALEXANDRIA, VIRGINIA

JUNE 4, 2019

DIRECT TESTIMONY SUMMARY

Carl W. Eger, III addresses the City of Alexandria's interests in the Potomac Yards Undergrounding and Glebe GIS Conversion Project. He provides a summary history of the project from the perspective of the City of Alexandria and also provides an overview of benefits that the City of Alexandria sees resulting from the Project.

In 1996 the City issued a special use permit ("SUP") for the location of the Potomac Yards North Terminal Station. A condition of the SUP was the undergrounding of overhead transmission lines upon the expiration of the SUP.

In March 2006, the City of Alexandria, in partnership with Arlington County and the Northern Virginia Regional Commission, completed the Four Mile Run Restoration Master Plan.

In 2010, the City adopted the North Potomac Yards Small Area Plan, which envisions the North Potomac Yards area as an environmentally and economically sustainable and diverse 21st Century urban, transit-oriented, mixed-use community and which seeks to create a regional destination with diverse built and natural spaces where people want to spend time in a wide variety of pursuits. This Small Area Plan references the Four Mile Run Restoration Master Plan's ambition to remove and relocate the Company's transmission infrastructure in order to realize the vision of the Alexandria community for the North Potomac Yards and Four Mile Run communities.

In 2013, upon expiration of the original SUP, the City of Alexandria renewed the SUP with the Company. This SUP renewal extended the SUP's expiration until 2021.

In 2017, the City of Alexandria adopted an amended and updated North Potomac Yards Small Area Plan. The 2017 Small Area Plan specifically calls for the undergrounding of the Company's power transmission lines and relocation of the terminal station infrastructure, acknowledging the forthcoming expiration of the SUP within the time period of the Small Area Plan's implementation period. The 2017 Small Area Plan recommends that the final alignment of the transmission lines and terminal station minimize impacts to the planned open space area of North Potomac Yards, including the future siting of the Alexandria community's Crescent Park.

The City of Alexandria fully supports Dominion's proposed Project because the relocation of the North Potomac Yard terminal station and undergrounding of overhead transmission lines are consistent with the Alexandria community's vision and actions of the Four Mile Run Restoration Master Plan and North Potomac Yard Small Area Plan. This is in addition reflected in the SUP already renewed once in 2013 and set to expire in 2021. The benefits the Project provides to the City of Alexandria are significant, especially when considered in conjunction with the aforementioned master plan efforts. This includes the efforts to restore and naturalize the banks of the Four Mile Run corridor; enhancing the ecology, aesthetics, and access of the area in connection with the broader Chesapeake Bay Watershed; the addition of open space park areas as community amenities; and alignment of necessary electrical transmission infrastructure with areas of similar character and use, namely the Glebe Road substation.

1 I. INTRODUCTION

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

3 My name is Carl W. Eger, III. My business address is 301 King Street, Alexandria,
4 VA 22314. I am employed as the Energy Manager for the City of Alexandria,
5 Virginia, a position which I have held since June 4, 2010.

6 Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

7
8 A. I am testifying on behalf of the City of Alexandria regarding the Application of
9 Virginia Electric and Power Company for approval and certification of the
10 Potomac Yards Undergrounding and Glebe GIS Conversion ("Project").

11 Q. PLEASE DESCRIBE YOUR ROLE AND PROFESSIONAL EXPERIENCE.

12 A. My responsibilities include leading the City's Office of Energy Management. In
13 this capacity, I lead an office responsible for, though not limited to, delivering
14 the City's energy management and water efficiency programs for City-owned or
15 operated properties and facilities; delivering energy efficiency and renewable
16 energy programs to the Alexandria community; ensuring reliable and resilient
17 power systems to critical City infrastructures; providing engineering and
18 operations supports to facility management and capital project teams; servicing
19 utility billings, including billings for electric resource services, for City-owned
20 and operated properties and facilities; and providing public utility policy and
21 regulatory issues guidance to the Alexandria City Council, City Attorney's Office,
22 City Manager's Office, and City departments and agencies.

1 Q. WHAT IS YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE?

2 A. I hold a Bachelor of Science in Electrical Engineering, a Bachelor of Science in
3 Computer Engineering, and a Master of Science in Engineering (Mechanical
4 Engineering and Energy Engineering concentrations with additional graduate-
5 level education in economics, econometrics, and public policy) from the
6 University of Dayton in Dayton, Ohio. I am currently completing a Masters of
7 Professional Studies in Sustainable Urban Planning from the George Washington
8 University. I am a registered Professional Engineer in the State of Ohio, a
9 Leadership in Energy and Environmental Design (LEED) Accredited Professional,
10 an International Society of Sustainability Professionals Sustainability Associate,
11 and a Certified Public Manager. In 2018, I completed the Michigan State
12 University Institute of Public Utilities Advanced Regulatory Studies Program
13 training. In 2017, I completed the Harvard University Executive Education in
14 Sustainability Leadership and Urban Land Institute-Washington Regional Land
15 Use Leadership Institute programs. In 2013, I completed the Michigan State
16 University Institute of Public Utilities Annual Regulatory Studies Program ("Camp
17 NARUC") training. From 2012 to present, I have served on the Virginia Energy
18 Purchasing Governmental Association (VEPGA) Board of Directors. I serve on
19 numerous other boards and commissions throughout the Metropolitan
20 Washington DC area and in the Commonwealth of Virginia in service to the
21 public.

1 After joining the City of Alexandria in 2010 as its Energy Manager, I was
2 promoted in 2011 to the City's Senior Management Group.
3 Before serving the citizens and City of Alexandria, from 2004 to 2006, I was Lead
4 Engineer of the US Department of Energy Industrial Assessment Center at the
5 University of Dayton with specializations that included industrial pumping
6 systems, including water treatment and conveyance, renewable energy power
7 systems, and energy efficiency. From 2007 to 2008, I served as the Energy
8 Manager for the City of Cleveland's Division of Water before being promoted in
9 2008 to the position of Energy Manager for the City of Cleveland Mayor's Office
10 of Sustainability, a position I held until 2010.

11 **Q. HAVE YOU EVER TESTIFIED BEFORE THE VIRGINIA STATE CORPORATION**
12 **COMMISSION OR ANY OTHER UTILITY REGULATORY AGENCY OR LEGISLATIVE**
13 **BODY?**

14 **A.** I have previously submitted testimony in the following Virginia State
15 Corporation Commission dockets: PUE-2014-00066, PUE-2015-00097, PUE-2016-
16 00001, PUR-2017-00149, and PUR-2018-00175.

17 **II. PURPOSE OF TESTIMONY AND SUMMARY OF RECOMMENDATIONS**

18
19 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

20 **A.** The purpose of my testimony is to represent the City of Alexandria's interests in
21 the SCC's consideration of the Potomac Yards Undergrounding and Glebe GIS
22 Conversion project. Specifically, I provide a summary history of the project from

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1 the perspective of the City of Alexandria, and I provide an overview of benefits
2 the City of Alexandria sees resulting from the project's implementation.

3 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION?**

4
5 **A.** I recommend that the Commission approve the Application and direct Virginia
6 Electric and Power Company d/b/a Dominion Energy Virginia ("Dominion" or
7 "Company") to work with the City regarding steps needed to implement the
8 relocation of the Potomac Yards Station.

9 **III. CITY OF ALEXANDRIA'S PERSPECTIVE ON PROJECT HISTORY**

10
11 **Q. PLEASE PROVIDE AN OVERVIEW OF THE CITY'S PERSPECTIVE OF THE HISTORY**
12 **OF THE PROJECT.**

13
14 **A.** In 1996, the City of Alexandria issued Special Use Permit ("SUP") # 96-0091 for
15 the location of the Potomac Yards North Terminal Station. A condition of the SUP
16 was the undergrounding of overhead transmission lines upon the expiration of
17 the SUP. City of Alexandria witness Farner will discuss in more detail the City of
18 Alexandria's SUP process and its relevance to the Project.

19 In March 2006, the City of Alexandria, in partnership with Arlington County and the
20 Northern Virginia Regional Commission ("NVRC") completed the Four Mile Run
21 Restoration Master Plan¹ ("FMRRMP"). The FMRRMP sets forth a vision for the

¹ https://alexandriava.gov/uploadedFiles/planning/info/masterplan/City_Master_Plan_Map/Four_MileRunRestorationMasterPlanCurrent.pdf

1 community that embraces the environmental and aesthetic value of the Four Mile
2 Run corridor, which is adjacent to the North Terminal Potomac Yards Station. The
3 FMRRMP highlighted numerous public comments regarding the visual blight
4 caused by the existence of the overhead transmission lines located alongside and
5 across the Four Mile Run corridor. The FMRRMP included discussion of the
6 additional study needed to explore the specific actions required for
7 undergrounding the lines within the stream corridor. Both Arlington County and
8 the City of Alexandria adopted the FMRRMP on March 14, 2016 and March 18,
9 2016, respectively.

10 In 2010, the City of Alexandria adopted the North Potomac Yards Small Area Plan²
11 (“NPYSAP2010”), which envisions the North Potomac Yards area “...as an
12 environmentally and economically sustainable and diverse 21st Century urban,
13 transit-oriented, mixed-use community...The Plan seeks to create a regional
14 destination with diverse built and natural spaces where people want to spend time
15 in a wide variety of pursuits.” The NPYSAP2010 references the FMRRMP’s ambition
16 to remove and relocate the Company’s transmission infrastructure in order to
17 realize the vision of the Alexandria community for the North Potomac Yards and
18 Four Mile Run communities.

2

<https://www.alexandriava.gov/uploadedFiles/planning/info/masterplan/NorthPotomacYardSAP2010asAmended.pdf>

In 2013, upon expiration of the original SUP, the City of Alexandria renewed the SUP with the Company as City of Alexandria witness Farner discusses. This SUP renewal extended the SUP's expiration until 2021.

In 2017, the City of Alexandria adopted an amended and updated NPYSAP³. The amended and updated NPYSAP specifically calls for the undergrounding of the Company's power transmission lines and relocation of the terminal station infrastructure acknowledging the forthcoming expiration of the SUP within the time period of the Small Area Plan's implementation period. The NPYSAP recommends that the final alignment of the transmission lines and terminal station minimize impacts to the planned open space area of North Potomac Yards, including the future siting of the Alexandria community's Crescent Park.

Q. IS THERE ADDITIONAL PROJECT HISTORY FROM THE CITY OF ALEXANDRIA'S PERSPECTIVE THAT YOU WISH TO BRING TO THE COMMISSION'S ATTENTION?

A. Yes. In approximately March of 2014, a team from the Company met with City staff to discuss the relocation of the North Potomac Yards terminal station and undergrounding of the overhead transmission lines. It is my understanding that Company and City staff discussed a potential project in context of a forthcoming project that was, at the time, in development, and may have overlap.

3

https://www.alexandriava.gov/uploadedFiles/planning/info/masterplan/City_Master_Plan_Map/NorthPotomacYardSAPCurrent.pdf

1 Subsequently, in June 2014, the Company notified the City of Alexandria of its
2 intention to implement a proposed 230-kV transmission line project from the
3 Glebe Road substation to the Potomac River Generating Station substation. This
4 project was cited as necessary as a result of several NERC reliability criteria
5 violations resulting from forecasted electrical capacity overloading as
6 determined by PJM, Inc. The proposed Project in this case would have been
7 included. The City of Alexandria subsequently formed the Underground
8 Transmission Line & Substation Working Group ("UTLWG") - a citizen task force
9 appointed to examine the effects of the 230-kV transmission line project – and
10 City of Alexandria staff subsequently worked closely with the Company from
11 June 2014 through May 2018 to evaluate and consider various options for the
12 230-kV transmission line and relocation of the Potomac Yard terminal station
13 and undergrounding of overhead lines adjacent to and across Four Mile Run.
14 Such coordination included much public outreach and communication with
15 those in the Alexandria (and Arlington) communities.

16 In September 2018, the Company notified the City that due to changes in regional
17 electrical load forecasts, it was no longer necessary to build a new 230-kV
18 transmission line from the Glebe Road substation to the Potomac River
19 Generation Station substation.

20 In January 2019, the Company met with City staff to provide updates on the
21 proposed relocation of the North Potomac Yard terminal station and

1 undergrounding of overhead transmission lines. At that time, the Company
2 presented initial plans and site remediation efforts, as well as proposed efforts
3 to transfer the site of the North Potomac Yards to the City of Alexandria. At that
4 time, the Company indicated that they intended to file an application with this
5 Commission in March 2019. During this meeting, City staff also discussed
6 elements of project implementation, including, but not limited to, several general
7 environmental impact and environmental mitigation measures, and
8 transportation management and construction techniques within the project
9 area. City of Alexandria witness Diez discusses these elements in further detail.

10 **IV. PROJECT BENEFITS TO THE CITY OF ALEXANDRIA**

11

12 **Q. DOES THE PROJECT PROVIDE SIGNIFICANT BENEFITS TO THE CITY OF**
13 **ALEXANDRIA?**

14

15 A. Yes.

16 **Q. WHAT IS THE BASIS FOR THAT ASSESSMENT?**

17

18 A. First and foremost, the relocation of the North Potomac Yard terminal station

19 and undergrounding of overhead transmission lines are consistent with the

20 Alexandria community's vision and actions of the Four Mile Run Restoration

21 Master Plan and North Potomac Yard Small Area Plan. This is in addition

22 reflected in the SUP already renewed once in 2013 and set to expire in 2021.

23 More specifically, the benefits the Project provides to the City of Alexandria are

24 significant, especially when considered in conjunction with the aforementioned

1 master plan efforts. This includes the efforts to restore and naturalize the banks
2 of the Four Mile Run corridor; enhancing the ecology, aesthetics, and access of
3 the area in connection with the broader Chesapeake Bay Watershed; the
4 addition of open space park areas as community amenities; and alignment of
5 necessary electrical transmission infrastructure with areas of similar character
6 and use, namely the Glebe Road substation. City of Alexandria witness Farner
7 further discusses many of these benefits envisioned by the Alexandria
8 community.

9 The area served by the facilities encompassed by the Project—the North
10 Potomac Yard terminal station, the overhead transmission lines adjacent to and
11 across Four Mile Run, and the Glebe Road substation— falls within the area
12 colloquially known as “National Landing” which is the future site for the Amazon
13 HQ2 location. The proposal for one of the largest economic development
14 opportunities in history was a result of the collaborative partnership between
15 Virginia Economic Development Partnership (“VEDP”), the City of Alexandria,
16 and Arlington County.⁴ Of note is the promotion of a robust underground
17 electrical network providing reliable power to the needs of those companies
18 located in the area that support the vibrant and robust Virginia economy. While I
19 am unable to speak to specific details regarding the enhanced electrical

⁴ <https://hqnova.com/>

1 reliability offered by the implementation of the project, it is the City of
2 Alexandria's opinion that the relocation of the North Potomac Yard terminal
3 station and undergrounding of overhead transmission lines supports enhanced
4 electrical reliability to support the interests and needs of the Alexandria and
5 Arlington communities, including existing residences and businesses as well as
6 those businesses and residences who may locate to this area in the future as
7 part of ongoing community and economic development efforts. By extension,
8 the Project supports the interests of the Commonwealth of Virginia.

9 **Q. DOES ARLINGTON COUNTY AGREE THAT THE PROJECT PROVIDES THESE**
10 **BENEFITS?**

11
12 **A.** I am unable to speak on behalf of Arlington County. However, based on the
13 letter sent to the City of Alexandria on September 19, 2013 (provided in the
14 Company's Application), along with recent discussions with Arlington County
15 staff, it is my understanding that Arlington County similarly supports this Project.

16 **Q. DOES THIS COMPLETE YOUR DIRECT PREFILED TESTIMONY?**

17 **A.** Yes.