BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

PCN-2

In the Matter of the Petition of	)
	)
TILLAMOOK PEOPLE'S UTILITY	)
DISTRICT	)
	)
PETITION FOR CERTIFICATE OF	)
PUBLIC CONVENIENCE	)
AND NECESSITY	)
	)
_____	)

DORIS MAST - INTERVENOR CROSS ANSWERING

March 26, 2019

Doris Mast – Intervenor Cross-Answering

I. Introduction

Doris Mast Intervenor feels that staff's requests for data and examination of data was conscientious but feels that staff was not given enough spatial information and enough information on the critical role of feeder 51 in the transmission line project. Consequently, Doris Mast feels ORS 758.015 was not met. Therefore, Doris Mast Intervenor will recommend that the Commission find a Certificate should not be issued after considering the record and arguments on necessity, safety, practicability and justification in the public interest.

Doris Mast Intervenor recommends the commission find a certificate for the proposed transmission line is not supported by the necessity, safety, practicability and justification in the public interest.

II. Discussion

A. Necessity

Petitioner has not demonstrated that Oregonians will forego something desirable and useful absent the transmission line and substation.

Staff describes the applicant's proposal as follows: 1. Construct a 115-kV transmission line 2. Construct a substation near Oceanside and 3. Construct two distribution feeders from the substation. The applicant **WANTS** this project to reduce load under normal operating conditions at the Wilson River by sending load from the BPA Tillamook substation to Oceanside on the transmission line. Under normal operating conditions, the average load of Wilson 1 & Wilson 2 is 33% of the new nameplate capacity of 90 MW[1]. The highest ever annual coincident peak of 2009 would be at 70% of the nameplate capacity of 90 MW.

While TPUD may **WANT** to spend $28.4 Million[2] to construct a transmission line and substation in Oceanside so 5 MW – 11 MW of power can be transferred, the current loads of Wilson River are such that absent the transference of 5 MWs – 11 MWs, no

[1] David Mast/300 p 6
[2] David Mast/500 p 7

person will forego something desirable and useful because Wilson River is able to meet current and future loads.

Transformer capacity was given as one of the primary reasons behind TPUD's petition[3]. At current capacity TPUD is able to reliably meet load and has adequate peak capacity. Staff also states that the transmission line project will provide TPUD the ability to transfer load to adjoining substations and serve expected load growth. TPUD already has the ability to transfer load to adjoining substations and the Wilson River can serve expected load for over 100 years under normal operating conditions before the capacity of 90 MW is reached at a growth rate of 0.45% and using the average of coincident peaks of the 5 previous years as the starting load[4]. Even using KC Fagen's method of starting with the highest coincident peak of 2009 with a growth rate of 0.9259%, the capacity of 90 MW is not reached for 38 years[5].Fagen uses the 1-hour highest load in TPUD's history (1 hour out of 631,152 hours) as the starting point and adds growth each year. The petitioner has not shown a great or absolute **NEED** for the transmission line because the Wilson River transformers currently provide sufficient capacity to meet current and future loads. The highest Wilson River 1 + Wilson River 2 + Garibaldi + Trask coincident peak was only 83% of the 106.7 MW capacity in the central valley under an N -1 scenario. This still leaves 18 MWs for even larger peaks in the future[6]. Using appropriate longevity analysis, the central valley will not reach the new capacity of 151.90 MWs for 147 years and the N -1 capacity of 106.5 MWs will be reached at 69 years with a growth of 0.45% and at 33 years with a growth of 0.9259%.[7]

KC Fagen uses the highest one hour out of 631,152 hours to calculate his N -1 scenario and he uses 0.9259% growth rate to adjust from 2009. He is calculating whether he can do a N -1 scenario when the new system peak happens. The problem KC Fagen has is feeder 51. TPUD wants to construct the transmission line because feeder 51 cannot reliably take 5 MW – 11 MW power from Tillamook to Oceanside. Consequently, the transmission line and substation would not be desirable or useful in any N -1 scenario (let alone a new system high peak) because it must use feeder 51 to return the needed power to the central valley. If the N -1 scenario is as urgent as TPUD portrays, reason dictates that the load should not be placed at the end of the worst feeder in the system.

[3] Staff's Brief-PCN2 p 3
[4] Doris Mast/Exhibit 301 Mast/1 Mast/2 Column C
[5] TPUD/Exh 401 Fagen/1
[6] Doris Mast/Exhibit 304 Mast/1
[7] Doris Mast/305 Mast/1, 2, 3

I need to resolve staff's conclusions that TPUD will gain only 8 – 17 years of load growth from the additional 11.5 MWs while the transmission project will accommodate 38 – 48 years. As mentioned above, KC Fagen uses the highest coincident peak in 71 years as his starting point and uses 0.9259% growth rate even though in the 2018 TPUD Construction Work Plan, he gives the growth of Wilson River 1 at 0.65% and Wilson River 2 at 0.90%[8]. This method is useful for determining if Wilson River has enough capacity to handle a new system peak but it does not give an accurate longevity analysis. He also fails to mention that his starting point of 63.1 MWs is 14.9 MWs below the capacity level of 78 MWs at which the transformer is added. (78 MWs – 63.1 MWs = 14.9 MWs). When I read his data[9], I read the first column of peak load numbers from 63.1 MWs down to the 90 MWs and find that the system can handle the largest ever coincident peak at Wilson River with growth of 0.9259% added for 38 years now that the additional capacity is added. That is what his table shows. His method, while telling us something important, is not appropriate to use as longevity analysis occurring under normal operating conditions. My tables do that as mentioned in the previous paragraphs.

If I interpret exhibit TPUD/401 Fagen/1 allegorically, what his chart is actually telling us becomes easier to understand.

Tale of the Wilson River Monster

KC Fagen has heard stories of a monster that lurks in the vicinity of the Wilson River Substation. This monster leaves behind a smell of ozone. All you see of him are scattered bursts of light described by some frightened souls as static electricity on steroids and by others as, like lightening man! This monster jumps into feeders and load goes up! No more normal operating conditions! Folk lore says he only comes once every 12 – 15 years and stays for an hour.[10] KC Fagen worries about this monster. This monster is growing at 0.9259% a year. KC Fagen keeps a chart of how big this monster gets year after year[11]. So, when he installed 11.5 MWs of additional capacity, he consulted his chart. The monster had been growing since 2009 and if he showed up in 2018 right after the additional 11.5 MWs was installed, half of his additional capacity was gone before he finished installing it. If the monster comes in 2026, he will gobble up the whole 11.5 MWs of additional capacity in one hour.

[8] CWP 2018 Section 5 p 38
[9] TPUD/Exhibit 401 Fagen/1
[10] TPUD/400 p 8
[11] TPUD/401 Fagen/1

> The intervenors have also been "peeking" at the chart tracking the monster's growth because if the monster gobbles all of the capacity at the Wilson River and the power goes off, intervenors have been threatened with tarring and feathering. Lucky for the intervenors, the monster will not be big enough to gobble all the 90 MWs capacity at the Wilson River until he is 38 years old and that assumes that he is growing at 0.9259%. If he grows out of his growth spurt and only grows at 0.45%, he will be 76 before he gobbles up the 90 MWs available. Hence, the year of tar and feathers seems far enough away that intervenors can stand their ground and say, "a substation and transmission line are not necessary". **The End**

Under normal operating conditions, the Wilson River can provide capacity for annual coincident peaks for 105 years at a growth rate of 0.45%[12]. I conclude that since TPUD has sufficient capacity to accommodate load growth of the highest coincident peak at the Wilson River for 38 years no one will forego something desirable and useful if the transmission line is not built.

Both Option 3 and the transmission line provide a redundant source of power so that repairs can be made without long outages to Oceanside – Netarts. Also, even with a simple rebuild of feeder 51, a generator can be used so that Netarts – Oceanside are not without power. So, while petitioner may **WANT** to build a transmission line in order to replace the aging feeder 51 wires, petitioner cannot argue that without the transmission line people will be without power and fails to provide evidence of great or absolute need where Oregonians will forego something desirable and useful without the transmission line project for the purpose of replacing aging infrastructure[13].

Intervenor Doris Mast argues that if the replacement of aging infrastructure is not included in the price of the project, it cannot be considered necessary. A reasonable person would assume if replacing aging infrastructure is a stated need of the project, it would be included in the price as good faith that what has been stated as a need will be constructed. A CPCN should not be granted to allow for replacement of aging infrastructure.

Staff errs in arguing that the transmission line is the best option to address capacity and reliability for TPUD[14]. The commission must decide if the "needs" TPUD has brought forward are credible and then, if the transmission line is not built will Oregonians forego

[12] Doris Mast/301 Mast/1 Column C
[13] ORCA Response Testimony of Sean Malone with Exh A – E, p 9
[14] Staff's Brief – PCN 2 p 4

something desirable and useful. It is not the commission's task to say they think one option is better than another. Having said that, I still need to discuss why the topics raised by staff can or cannot be met by options other than the transmission line. Staff argues that from a reliability standpoint, if a transmission line is not built, voltage regulators would need to be installed on feeder 51[15]. Is staff aware the proposed transmission line project will use voltage regulators to pick up Cape Meares and part of Wilson River[16]? If voltage regulators are acceptable on feeder 51 with the transmission line surely voltage regulators are acceptable on feeder 51 in Option 3. Installing a voltage regulator does not mean that Oregonians had to forego something desirable and useful. The CPCN should not be granted on the argument that building the transmission line is better than using a voltage regulator on Option 3.

I mentioned previously staff's brief describes the project as including two distribution feeders[17]. I do not think TPUD gave enough detailed information to staff so the commission could fully understand what the project actually constructs in the two 'distribution feeders"[18] as required by ORS 758.015. Later descriptions said the substation was a half mile from Oceanside and two miles from Netarts[19]. This dovetails with a simple sketch[20] which shows blue lines for the transmission project construction as coming from the BPA substation to the new Oceanside substation, with 2 blue lines coming out of the Oceanside substation (2.5 miles total) to feeder 51 shown as green lines. Off side are 2 green circles representing Oceanside and Netarts. When TPUD says two **NEW** Oceanside and Netarts feeders would provide electricity to about 775 customers each and the risk of outages would be .5 miles and 2 miles respectively, with 775 customers each[21], does Staff believe it? When the argument is made that there are 19.2 miles of overhead exposure and 3.3 miles of underground exposure in Option 3 which gives a greater probability of outage than the transmission line with 2.5 miles of underground lines **FOR** the Oceanside and Netarts feeders, 8.4 miles of overhead exposure of feeder 51 and 8.7 miles from the transmission line,[22], does staff believe it? I hope not. The above arguments imply that the 2 new distribution feeders will each serve 775 customers. One is .5 miles long and one is 2 miles long. Please consult the

[15] Staff's Brief – PCN 2 p 4
[16] TPUD 2018 Construction Work Plan 402B p 41, p 42
[17] Staff 200 Hanhan 8
[18] TPUD/200 Fagen/4
[19] TPUD/400 p 22
[20] TPUD/ 205 Fagen/48
[21] TPUD/400 Fagen 23 lines 1 - 4
[22] TPUD/400 Fagen 23 lines 19 - 23

map showing the described .5 mile and 2-mile feeders[23]. This map shows that these two new distribution lines do not serve 775 people on either the .5-mile line or the 2-mile line. The 2-mile line is in the forest where there are no homes. The .5 mile on is by the water treatment plant with no homes. These 2 ties merely connect the substation to feeder 51. Those miles of feeder 51 are missing from the tally and the probability of outage evaluation. Feeder 51 delivers all the power in Option 3 and feeder 51 delivers all the power in the transmission line project. Even broken into segments and renamed, the miles of overhead lines that used to be part of feeder 51 and are now connected to the 2 new getaways are the overhead wires used to distribute power and must be included as miles of overhead wires.

The transmission line evaluation for outage probability[24] also does not include the Cape Meares line as it is added to feeder 51[25]. I do not feel that staff was given enough spatial information and description of feeder 51's role in the transmission line project as required under ORS 758.015.

Staff erroneously argues that Option 3 would not resolve reliability issues because "the old and the new distribution routes would cross wooded areas"[26]. The transmission line does nothing to reduce the many trees along feeder 51 nor does it address car hit pole incidents. Since the transmission line is not connected to any homes in Netarts – Oceanside, all power service will be delivered using feeder 51. KC Fagen argues that the probability of an outage is greater on Option 3 because its exposure to overhead lines is greater[27]. This is incorrect. Since feeder 51 is the only way power is distributed to homes with either Option 3 or the transmission line, the 5.6 miles of feeder 51 that will be connected to the new 2.5 mile getaway feeder and the new .5 mile getaway feeder are still overhead line, thus, exposure to outage. Don't forget the 6.5 miles added by picking up Cape Meares. (14 miles feeder 51 + 8.6 miles transmission line + 6.5 miles Cape Meares = 29.1 miles for the transmission line overhead wires). This means the overhead exposure to lines for the transmission line is 29.1 miles.

For significant outages on feeder 51 in Option 3 caused by car-hit pole, the outage duration would drop from 6 – 8 hours to 1 -2 hours[28]. Since vehicles cause 59,057[29] customer hours out (42% of all outages), a 75% reduction in car-hit poles customer

[23] TPUD/105 Simmons/12
[24] TPUD/400 Fagen 23
[25] Doris Mast 300 Exhibit 307
[26] Staff's Brief – PCN 2 p 5
[27] TPUD/400 Fagen /23
[28] TPUD/400 Fagen/25
[29] TPUD Exh 414 Outage Summary

hours out would remove 44,306.25 customer hours out. (59,075 customer hr X .75 = 44,306.25 customer hr). No customer will endure a longer outage in car-hit outages whether redundancy comes from Option 3 or the transmission line option.

Since both the transmission line project and Option 3 distribute power to homes on feeder 51, it follows that if staff argues Option 3 cannot resolve reliability problems, neither can the transmission line. The petition should not be granted on staff's erroneous conclusion that reliability issues on Option 3 would not be resolved.

The worst feeder in the system is delivering all of the power to homes in Oceanside and Netarts whether in Option 3 or the transmission line option. The worst feeder in the system is being asked to deliver power back to 10,000 customers during an N -1 scenario! The segment of feeder 51 that caused 84% of the outages is the segment TPUD will use to return capacity to Tillamook. (Total of major outages from Phelps getaway feeder to Tillamook = 1 + 1 + 12 + 1 + 1 = 16 Since there were 19 major outages shown for feeder 51 16/19 = 84%)[30] Poor reliability has been shifted from a smaller population of 1,650 customers, 40% of whom are seasonal meters, to a larger population of 10,000 regular residential, large commercial, hospital and industry. When 10,000 people face a loss of reliability in an effort to improve reliability for 1,650 people, TPUD has not demonstrated that reliability on TPUD's system has been improved.

Reliability in TPUD's system has not been improved by building the transmission line and the necessity standard has not been met. Option 3 improves reliability for Oceanside – Netarts without causing loss of reliability in Tillamook, therefore, no Oregonian is harmed if the transmission line is not built.

Staff investigated whether conservation efforts could mitigate the need for the line but notes that conservation does not address the two issues of replacing aging infrastructure or improving reliability[31]. ORCA has entered testimony that both of those issues can be addressed by upgrading existing infrastructure and concludes that the project is not necessary because no Oregonians forego something desirable or useful if aging infrastructure and reliability are addressed through upgrades rather than building the transmission line and substation[32].

The transmission line is not desirable and useful because capacity is already sufficient, aging infrastructure can be replaced absent the transmission line and reliability

[30] TPUD-Staff DR-31 p 1 Map Proposed Oceanside Substation and Feeders
[31] Staff's Brief – PCN 2 p 5
[32] ORCA Rsponse Testimony of Sean Malone filed 3-02-2018 p 9

improves with Option 3 without shifting reliability problems from a smaller to a larger population as the transmission line project does.

Based on the above, Intervenor Doris Mast recommends the commission find the proposed transmission line is not necessary.

B. Safety

Putting a transmission line through the center of Stimson forest will create a fire hazard due to the steep terrain with high coastal winds. Evacuating the population of Oceanside and Netarts would be difficult because a major road has been closed for several years due to landslides. It is not in the public interest to subject the Oceanside – Netarts rate payers to a fire hazard when a distribution line rebuild or Option 3 could increase reliability. Increasing the conductor size would allow TPUD to serve the existing and future loads of Oceanside – Netarts and Whiskey Creek [33].

Doris Mast Intervenor concurs with the Kurt Mizee testimony that TPUD could improve safety on feeder 51 substantially without building the transmission line[34]. The transmission line project does not improve safety for the public driving on highway 131.

TPUD placed the transmission line poles 25 feet off the shoulder of the Wilson River Loop because it has heavy traffic[35] and argues this makes the transmission line more reliable. Feeder 51 is not being maintained in a way that protects the public from danger, as evidenced by the fact that 59,075 customer hours out are caused by car-hit pole incidents. To Kurt Mizee's point, moving the poles further back on the heavily traveled state road 131 improves both safety and reliability. By doing nothing to decrease the car-hit poles on 131, TPUD is failing to address a safety problem. Since building the transmission line in a safe manner does not reduce the safety hazards on state road 131, no one is safer after the transmission line is built, and as ORCA testified, TPUD is creating the possibility of significant fire hazards by putting a transmission line where only distribution lines are permitted. Petitioner is creating a significant safety risk that otherwise would not exist in the area[36]

C. Practicability

If the transmission line were feasible, i.e. possible without difficulty or damage, it would already be built. Instead TPUD has been embroiled in controversy for over 8 years.

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[33] Doris Mast/300 p 2
[34] Kurt Mizee/400 p 2
[35] TPUD/400 Fagen/23
[36] ORCA Response Testimony of Sean Malone with exhibits A – E, p 3

TPUD has spent enormous sums of money on lawyer fees, consultants on evaluating easements, the CAG, and various experts to prepare applications for permits. 2 long time TPUD board members have been voted out of office, one had been on the board for 29 years, the other for 22 years. TPUD's difficulty getting easements exemplifies that this transmission line project is not feasible.

TPUD may experience more difficulty than expected in getting an easement from Eric Peterson. They are demanding an easement from Eric in order to place Oceanside – Netarts residents on reconfigured segments of feeder 51 and then they turn around and place Eric at the end of the feeder 51[37] segment that has caused 84% of feeder 51's outages. This could easily become the issue that unites all the property holders on the route. This route causes damage to Eric by construction and permanent inconveniences of the electrical system on his property but to add insult to injury, it gives Eric the less reliable service that Netarts – Oceanside had before TPUD took Eric's property to build the transmission line. This damage is not acceptable. The route is not practicable.

Option 3 is more suitable because it can be constructed without difficulty. Option 3 consists of building a 2-mile section of distribution lines in the road right of way connecting 2 already existing distribution lines. Contrast that to the transmission line with only 2 miles in a public right of way[38] and the rest in farmers fields, on privately owned roads in forests, and privately-owned railroad right of way. Option 3 is more convenient to construct. 2 miles of distribution poles in the road right of way can be built by TPUD's own crews. Option 3 does not cause damage by removing 36 acres of trees, or build poles in the estuary, and the middle of farms.

Doris Mast Intervenor disagrees with staff's conclusion that there is no potential route that would not cross agricultural lands, so the proposed route is appropriate[39]. Certainly, staff can argue that no new transmission line can be constructed between Tillamook and Oceanside without crossing farm land. However, the 2-mile build in the road right of way connecting a Trask feeder to feeder 51 adds no new poles on farm land. The connection from Bayocean to the northern part of the Oceanside feeder 51 does not place any new poles on farm land.

Option 3 is more suitable both on greater ease of construction and greater ease of obtaining easements. Just rebuilding feeder 51 would require no new easements and renting a generator so people would not be without power during construction is less

[37] Doris Mast/300 p 9, 10
[38] Kurt Mizee Reply Testimony 3/02/2018 p 1
[39] Staff's Brief - PCN 2 p 7

than TPUD has spent with their 8-year pursuit of building this transmission line. As ORCA argues, the transmission line places unnecessary infrastructure in rural Tillamook County rather than providing workable alternatives for identified problems. ORCA goes on to argue that the transmission line is disrupting the landscape, local businesses and families[40].

TPUD has failed to understand the damage they are inflicting to their own reputation by not allowing rate payers to discuss need at the CAG and by refusing to meet with property owners to discuss alternatives[41] and further by using outside experts to push the line through. As Don Aufdermauer eloquently put it, "I am appalled that our TPUD Board of local citizens would hire somebody to come to Tillamook to trample over the local people for a transmission line that is not needed nor can they afford it. I am embarrassed that business and life has gone to this level when citizens have no voice."[42].

Doris Mast Intervenor declares that if there is no need for a transmission line, no route would be practicable. Doris Mast Intervenor recommends the commission find the project is not practicable.

D. Justification

The petitioner must show sufficient reason for the project to be built. The project adds 22 MWs capacity at Oceanside which will not be needed for 38 years using KC Fagen's 0.9259% growth of the 1 hour highest ever coincident peak of 2009[43]. The petitioner has not shown sufficient reason for the project on capacity arguments at the Wilson River substation. Since the substation and transmission line are already 38 years old before you begin to need the capacity of the new substation, no substantial benefit has been demonstrated and there is no need for the transmission line and substation to be built at a cost exceeding $24.8 million. The petitioner has not shown sufficient reason for the project with his N -1 arguments[44]. Capacity is sufficient to allow for load growth to serve new customers. When conductors are updated on feeder 51 new customers can continue to be added to feeder 51[45]. Since the transmission line is not necessary to

[40] ORCA's Petition to Intervene p 3
[41] David Mast/200 p 3, 4; David Mast/400 p 9
[42] Don Aufdermauer/300 p 3
[43] TPUD/Exhibit 401 Fagen/1
[44] Doris Mast/300 p 6
[45] Doris Mast/300 p 2

provide power to new customers, or add capacity for normal operating conditions or N - 1 scenarios, petitioner has not shown sufficient reasons for the project to be built[46].

TPUD says a benefit of the transmission line is that it will increase overall system reliability[47]. Increasing the number of people receiving power from the segment of feeder 51 which has produced 84% of the outages on that line from 1,650 people in Oceanside – Netarts to 10,000 people of the central valley does not increase overall system reliability. Ratepayers should not pay $24.8 million for a transmission line that shifts reliability issues from 1,650 people to 10,000 people. The promised benefit will not be realized and the project is not justified.

Petitioner has not proven that the line is necessary to improve reliability[48]. The project shifts reliability from 1,650 people in Oceanside – Netarts, 40% of whom are on seasonal meters, to 10,000 people in the central valley with its critical load. If feeder 51 cannot provide reliable power to Oceanside carrying 5 MW – 11 MW, feeder 51 cannot carry a similar amount to Tillamook. It is not reasonable to expect feeder 51 to reliably carry power to the 10,000 people in the Tillamook valley or perform well in an N -1 scenario, when petitioner argued that the project is needed to carry power to Oceanside on a transmission line because feeder 51 could not reliably carry power to Oceanside. The thought process is not sound, the project is not valid and it has not been justified.

Since the transmission line project cannot reliability return power to Tillamook on the segment of feeder 51 that caused 84% of the major outages, and capacity is already adequate absent the transmission line, and aging infrastructure can be replaced absent the transmission line, ORCA is correct to argue there are more efficient and cost-effective ways of increasing reliability for the Oceanside – Netarts than building a transmission line. A cost benefit analysis does not favor finding the project is justified[49].

Petitioner's stated reasons (returning power to Tillamook by using feeder 51) cannot be met. Petitioner's stated reason (replace aging infrastructure, increase reliability to Oceanside – Netarts) can be met by other projects not requiring a petition. Petitioner's stated reason (add capacity) is not needed as current capacity is sufficient to meet current and future loads. The cost benefit analysis does not favor a finding that the project is justified. Doris Mast Intervenor recommends there is not sufficient reason for the project and it is not justified in the public interest.

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[46] Doris Mast/400 p 4, 15
[47] TPUD/100 Simmons/3
[48] Doris Mast/300 p 4, 5; Doris Mast/400 p 3, p 4
[49] ORCA Response Testimony of Sean Malone 3-02-2018 p3

The final cost of the project will be close to $24.8 million[50]. Rate payers are being asked to pay $24.8 million over the next 25 – 30 years while revenue is falling[51] for a project with only one remaining benefit, increasing reliability in Oceanside and Netarts.

Since Option 3 or rebuilding feeder 51 can increase reilability, the transmission line cannot be justified when the large cost is compared to the small benefit.

Staff's conclusions that failure to construct the line may result in continued prolonged outages, safety concerns, increases in rates and inability to provide power to new customers, are not sound and do not confirm to fact or reason. Continued failure to rebuild feeder 51 will cause the aforementioned. Since the only objective the transmission line can meet is to improve reliability to Oceanside – Netarts, the benefits from repairing feeder 51 or Option 3 are similar to the transmission line. Rate payers do not benefit from spending $24.8 million before any improvements are made to feeder 51, nor does the public derive any benefit from spending $24.8 million on unnecessary infrastructure. The benefits of this project are dwarfed by its cost and damage.

Doris Mast Intervenor recommends that there is not sufficient reason for the project and it is not justified in the public interest. Based on the above, Doris Mast Intervenor recommends that the Commission find a Certificate of Public Convenience and Necessity is not supported by the necessity, safety, practicability and justification in the public interest.

Dated this 26th day of March 2019

/s Doris Mast

[50] David Mast/500 p 7
[51] Doris Mast/300 p 12, 13