

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF MARYLAND**

In the Matter of the)	
Application of Catoctin Power, LLC)	
for a Certificate of Public Convenience and)	Case No. 8997
Necessity To Construct a 600 MW Generating)	
Facility in Frederick County, Maryland)	

SUPPLEMENTAL TESTIMONY OF PETER D. HALL

1 Q. PLEASE STATE YOUR NAME, OCCUPATION, AND CURRENT
2 POSITION.

3 A. My name is Peter D. Hall. I am President of Metametrics, Inc., of
4 Charlottesville, Virginia, and a consulting economist who specializes in
5 regional economics and socioeconomic impact assessments. A statement
6 of my educational background, occupational history, and professional
7 qualifications is appended to this testimony as Appendix A.

8 Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?

9 A. The purpose of this supplemental testimony submission is to present my
10 conclusions regarding the socioeconomic impacts associated with Catoctin
11 Power’s proposed natural gas pipeline and the primary and secondary
12 water supply and discharge pipeline alternatives. These analyses are
13 contained in PPRP’s report titled *Environmental Review of the Proposed*
14 *Catoctin Power Project* (DNR Exhibit __ (DHB-2A)). Specifically related to
15 this testimony, I am sponsoring parts of Section 5.3.3 – Linear Facilities
16 Impacts.

17 Q. WHAT ARE YOUR CONCLUSIONS REGARDING IMPACTS FROM
18 THE NATURAL GAS PIPELINE ASSOCIATED WITH THE
19 CATOCTIN POWER FACILITY?

1 A. Construction impacts are expected to be limited to nuisance impacts
2 associated with excavation and trenching. The route crosses three public
3 roads, but few traffic disruptions are anticipated if jack and bore
4 technology is used to construct the pipeline under these facilities. There
5 are no known archaeological or historical resources in the right-of-way or
6 within 100 meters of the right-of-way.

7 **Q. PLEASE DESCRIBE CATOCTIN POWER’S PRIMARY WATER**
8 **SUPPLY AND DISCHARGE PIPELINE.**

9 A. Catocin Power’s primary water supply/ discharge alternative would
10 obtain treated wastewater effluent from Frederick County, and discharge
11 the used wastewater after treatment through an existing 18-inch outfall
12 line connection from Eastalco to the Potomac River. The pipeline corridor
13 would follow Manor Woods Road, with one proposed route running
14 along the north side of the right-of-way and another running along the
15 south side of the road. All property along the route is owned by Eastalco
16 except for the Manor Woods Road right-of-way, which is owned by
17 Frederick County. The area is comprised of either open land, agricultural
18 fields or wooded areas.

19 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING IMPACTS FROM**
20 **THE CATOCTIN POWER’S PRIMARY WATER SUPPLY AND**
21 **DISCHARGE PIPELINE?**

22 A. Excavation for the pipeline would be parallel to the Manor Woods Road
23 right-of-way, thereby avoiding impacts to traffic. Locating the pipeline
24 corridor on the north side of the Manor Woods Road, however, would
25 route the pipeline under the road, which would delay or detour traffic if
26 the pipeline trench is excavated. No other significant socioeconomic
27 impacts are anticipated.

28 **Q. PLEASE DESCRIBE CATOCTIN POWER’S SECONDARY WATER**
29 **SUPPLY AND DISCHARGE PIPELINE?**

1 A. Catoctin Power’s secondary water supply/ discharge alternative would
2 draw water directly from the Potomac River through a new pipeline and
3 related infrastructure, and discharge wastewater directly into the Potomac
4 River through an adjacent wastewater pipeline. A total of thirteen routes
5 were evaluated by the Applicant, of which two, Route A and Route B,
6 were preferred by Catoctin Power.

7 Both routes utilize the southernmost of two APS transmission line rights-
8 of-way that connect the project site to the Doubs substation and a segment
9 that skirts the Doubs substation and crosses the US 15 right-of-way. Route
10 A takes a more westward route, traversing Catoctin Mountain and
11 entering the Potomac River about 2.5 miles upstream from Point of Rocks.
12 Route B follows the US 15 corridor to the Potomac River Bridge.

13 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING LAND USE**
14 **IMPACTS FROM THE CATOCTIN POWER’S SECONDARY WATER**
15 **SUPPLY AND DISCHARGE PIPELINE?**

16 A. Most routes are within transmission corridors, which are nearby, but not
17 adjacent to occupied residences. Route A would traverse several
18 privately-owned properties between Catoctin Mountain and the Potomac
19 River. Route B would be partly within a major transportation corridor.
20 Impacts would be primarily construction-related, associated with
21 excavation and trenching for laying the pipeline.

22 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING HISTORICAL**
23 **AND ARCHEOLOGICAL IMPACTS FROM THE CATOCTIN**
24 **POWER’S SECONDARY WATER SUPPLY AND DISCHARGE**
25 **PIPELINE?**

26 A. Except for the C&O Canal National Historical Park, there are no
27 inventoried historic structures within the proposed corridors. However,
28 Route A would traverse two inventoried archeological study areas. MHT
29 has not yet made a determination of adverse effect from construction of a
30 pipeline over this route, but may require Catoctin Power to undertake a

1 Phase I archeological survey to identify sites within the project boundary
2 with potential cultural significance.

3 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING**
4 **TRANSPORTATION IMPACTS FROM THE CATOCTIN POWER'S**
5 **SECONDARY WATER SUPPLY AND DISCHARGE PIPELINE?**

6 A. Any pipeline route would cross local and state roads, and the CSX
7 railroad line. Construction impacts at crossings of major roads, such as
8 state and federal highways, and the rail corridor would be minimized by
9 employing jack and bore methods rather than excavation. Traffic on local
10 roads would be temporarily disrupted or detoured during trenching for
11 the pipeline at crossings. Routes A and B traverse the US 15 right-of-way,
12 which is a Civil War Battlefields Scenic Byway. The section of US 15
13 between the Potomac River and US 340 is listed in the Highway Needs
14 Inventory (HNI) as a potential freeway reconstruction. If a pipeline along
15 US 15 was determined to be the most viable option, then prior to
16 construction the SHA would require a Memorandum of Understanding or
17 a Letter of Agreement to be executed between the SHA and Catoctin
18 Power that would assign financial responsibility to Catoctin Power for the
19 relocation of the pipeline if any future improvements to US 15 are
20 required.

21 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING IMPACTS FROM**
22 **THE CATOCTIN POWER'S SECONDARY WATER SUPPLY AND**
23 **DISCHARGE PIPELINE ON THE C&O CANAL NATIONAL**
24 **HISTORICAL PARK?**

25 A. Because the secondary water supply and discharge alternative utilizes the
26 Potomac River, all proposed routes (with the possible exception of Route
27 B) go through the C&O Canal National Historical Park. As a result,
28 construction and operation of a water supply and discharge pipeline will
29 require a permit from the National Park Service (NPS), which is currently
30 reviewing the application. The NPS will likely require Catoctin Power to
31 conduct an Environmental Assessment or an Environmental Impact
32 Statement to assess impacts on the C&O Canal National Historical Park.

1 However, there are a number of issues that will have to be addressed by
2 the applicant before permitting is likely.

3 Direct access to the Potomac River from east of Brunswick to the
4 Monocacy River is limited to entrances to the C&O Canal National
5 Historical Park. Use of the canal towpath by construction or service
6 vehicles is an exceptional use of park facilities. Also, construction of
7 facilities on park property would require a construction staging area, for
8 which there is little available. Another area of concern to the NPS is fuel
9 storage. Catoctin Power has indicated that a backup generator would be
10 located in the pump house to supply power in the event of an outage. The
11 generator and 600 gallons of fuel would be stored inside the pump house.

12 Catoctin Power could avoid several environmental issues by locating the
13 pump house outside of the park. Of the alternative pipeline routes, there
14 are few locations where placement appears feasible. Catoctin Power has
15 targeted Route B as a preferred alternative partly because it locates the
16 pump house and intake structure within what it believes to be an
17 easement owned by the Maryland SHA. However, SHA ownership of an
18 easement through the C&O Canal National Historical Park is disputed by
19 the NPS, and definitive documentation of ownership has not been
20 produced. Furthermore, SHA ownership does not necessarily preclude
21 environmental review by the NPS since the C&O Canal National
22 Historical Park would still be adjacent to the proposed corridor and
23 vehicles would have to enter the park to access the site. Land is limited
24 for locating a pump house in this corridor, and placement of an intake
25 structure near the shoreline could interfere with a public boat ramp under
26 the Potomac River Bridge.

27 These issues lead the State to recommend that Catoctin Power should
28 increase the number of pipeline routes under consideration. Other
29 alternatives downstream from Catoctin Power's preferred pipeline routes
30 may be viable that are less intrusive on the C&O Canal National Historical
31 Park. For example, Route F would traverse only 292 feet of NPS property,
32 and terrain appears to be favorable for locating the pump house on
33 private property north of the CSX railroad line. This would address NPS

1 concerns about construction staging, fuel storage for the backup
2 generator, and the use of the towpath for service vehicle access and.
3 Lateral boring under the CSX railroad line, C&O Canal and park between
4 the pump house and intake structure would minimize impacts to these
5 facilities.

6 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING IMPACTS FROM**
7 **THE CATOCTIN POWER'S SECONDARY WATER SUPPLY AND**
8 **DISCHARGE PIPELINE ON THE POTOMAC RIVER?**

9 A. The Potomac River in Frederick and Montgomery counties has been
10 designated as "Scenic" by the Maryland General Assembly and is part of
11 the Maryland Scenic and Wild Rivers System. As the State is required to
12 protect and enhance the qualities of a designated river, construction and
13 operation of intake and discharge pipelines is subject to approval by the
14 Secretary of the Maryland Department of Natural Resources.

15 The effect that the water supply and discharge pipelines have on the
16 natural values of the Potomac River will depend upon the design of intake
17 and discharge structures and the location of the pump house. Catoctin
18 Power has not chosen a final alignment for the pipeline corridor or
19 specific design specifications for intake and discharge structures.
20 However, it has committed to design the pump station building to
21 minimize visual impact and noise, which would mitigate its effect upon
22 the river.

23 Catoctin describes several intake structure designs that the project could
24 utilize. Conventional and submerged screen intake structures would be
25 visually less intrusive, but none of the designs would impede the natural
26 flow of the river. Similarly, it has proposed locating the wastewater
27 discharge pipeline and submerged diffuser assembly to avoid disrupting
28 navigation. As a result, discharge from the wastewater pipeline is not
29 expected to affect the natural values of the Potomac River.

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

31 A. Yes, it does.

Appendix A

Statement of Qualifications

APPENDIX A
STATEMENT OF QUALIFICATIONS
for Peter D. Hall

Experience and Employment

Dr. Peter D. Hall is a consulting economist and president of Metametrics, Inc., a Charlottesville consulting and software services firm. He has over twenty years of experience in regional economic analysis and socioeconomic impact analysis. Over that period he has directed numerous consulting engagements assessing the economic, social and other effects of economic development and infrastructure investment projects. Dr. Hall has undertaken consulting assignments for a large number of clients including major telephone utilities, banks, the U.S. Army Corps of Engineers, the Department of Energy, the U.S. Department of Commerce and the Environmental Protection Agency.

For the Maryland Department of Natural Resources, Dr. Hall directed the Power Plant Research Program's socioeconomic assessment in the Western Maryland Power Plant Siting Study. He also conducted the socioeconomic assessments for Baltimore Gas and Electric's (BG&E's) proposed Perryman facility and Delmarva Power and Light's proposed Dorchester facility. Dr. Hall directed PPRP's environmental reviews for PEPCO's Station H power plant, PEPCO's Chalk Point CT project, Panda Energy Corporation's Panda-Brandywine cogeneration facility, and projects in Laytonsville and College Park, Maryland. He has also been involved in the estimation and forecasting of residential, commercial, industrial and peak-load electricity demand in the Allegheny Power System service territories. More recently, Dr. Hall directed socioeconomic assessments on behalf of PPRP for the ODEC/Reliant project in Cecil County, for the Kelson Ridge project in Charles County, the Mirant combined cycle facility in Montgomer County, and the Clipper and U.S. Windforce wind energy projects in western Maryland.

Dr. Hall was previously employed as a Managing Associate of Urban Systems Research and Engineering, Inc. and as a Senior Technical Engineer at the Sorites Group, Inc. He has also served as an adjunct instructor in the Department of Civil Engineering of Tufts University. He is currently president of Metametrics,

Inc. and a Senior Systems Consultant to the Health Industry Business Communications Council.

Dr. Hall received his B.A. in 1974 and M.A. in 1975 from McMaster University in Economic Geography. He received his Ph.D. in Civil Engineering (Transportation) from the Massachusetts Institute of Technology in 1980.