

MEMORANDUM

To: Parties to PSB Docket No. 7970

From: Susan M. Hudson, Clerk of the Board

Re: Questions for Palmer Witness Freedman

Date: September 18, 2013

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Mr. Curt Freedman submitted prefiled testimony on behalf of Nathan and Jane Palmer. In lieu of having Mr. Freedman appear at the hearing, the Public Service Board ("Board") requests that Mr. Freedman respond to the following questions in writing.

1. On page 3 of Mr. Freedman's testimony, he estimates the necessary setbacks for the portion of the pipeline that would pass through the Palmer property based upon the Rhodes report. Can you please provide a citation to where the Rhodes report may be available electronically.

2. Mr. Freedman's testimony recommends setbacks that should apply to the placement of the proposed pipeline. He states that these are based upon the Rhodes report. However, he does not explain how he derived his recommendations. Please provide the calculations and assumptions that led to his conclusion?

3. Is Mr. Freedman aware of any domestic or international jurisdictions that have adopted the Rhodes methodology as the basis for establishing setbacks for natural gas pipeline construction. If so, please identify them.

The Board requests that Mr. Palmer file responses from Mr. Freedman to these questions by October 1, 2013. The Board intends to incorporate them into the evidentiary record. Other parties may request an opportunity to respond.