

**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE: APPLICATION OF TRANS-ALLEGHENY	:	
INTERSTATE LINE COMPANY FOR	:	
(I) A CERTIFICATE OF PUBLIC CONVENIENCE	:	
TO OFFER, RENDER, FURNISH AND/OR	:	
SUPPLY TRANSMISSION SERVICE IN THE	:	
COMMONWEALTH OF PENNSYLVANIA;	:	
(II) AUTHORIZATION AND CERTIFICATION	:	
TO LOCATE, CONSTRUCT, OPERATE AND	:	Docket Nos. A-110172
MAINTAIN CERTAIN HIGH VOLTAGE ELECTRIC	:	A-110172F0002
TRANSMISSION LINES AND RELATED ELECTRIC	:	A-110172F0003
SUBSTATION FACILITIES; (III) AUTHORITY	:	A-110172F0004
TO EXERCISE THE POWER OF EMINENT	:	G-000721229
DOMAIN FOR THE CONSTRUCTION AND	:	
INSTALLATION OF AERIAL ELECTRIC	:	
TRANSMISSION FACILITIES ALONG THE	:	
PROPOSED TRANSMISSION LINE ROUTES	:	
IN PENNSYLVANIA; (IV) APPROVAL OF AN	:	
EXEMPTION FROM MUNICIPAL ZONING	:	
REGULATION WITH RESPECT TO THE	:	
CONSTRUCTION OF BUILDINGS; AND	:	
(V) APPROVAL OF CERTAIN RELATED	:	
AFFILIATED INTEREST ARRANGEMENTS	:	

**REJOINDER TESTIMONY OF FRANCIS R. CHIAPPETTA**

**Re: Real Estate Valuation Issues**

**March 19, 2007**

REJOINDER TESTIMONY OF FRANCIS R. CHIAPPETTA

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Francis R. Chiappetta, MAI, 1225 8<sup>th</sup> Avenue, Beaver Falls,  
3 Pennsylvania.

4

5 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

6 A. Yes. I have filed written Rebuttal Testimony on behalf of Trans-Allegheny Interstate  
7 Line Company ("TrAILCo"), which has been designated as TrAILCo Rebuttal  
8 Statement No. 17.

9

10 Q. PLEASE DESCRIBE THE PURPOSE OF YOUR REJOINDER TESTIMONY.

11 A. This Rejoinder Testimony addresses assertions about my rebuttal testimony,  
12 contained in surrebuttal testimony from Energy Conservation Council ("ECC")  
13 witness Robert Q. Hanham in ECC Surrebuttal Statement No. 2. The specifics are  
14 set forth below.

15

16 Q. WILL THE USE OF VARIOUS TERMS IN YOUR REJOINDER TESTIMONY BE  
17 CONSISTENT WITH THE DEFINITIONS ASSIGNED TO THOSE TERMS IN  
18 THE TABLE OF NOMENCLATURE ATTACHED TO TRAILCO WITNESS  
19 FLITMAN'S DIRECT TESTIMONY AS TRAILCO EXHIBIT DEF-1?

1 A. Yes. In addition, I may define other specific terms in my rejoinder.

2

3 Q. PLEASE COMMENT ON THE HANHAM SURREBUTTAL POINTS WITH  
4 WHICH YOU DISAGREE.

5 A. At pages 5-6 of his Surrebuttal, ECC witness Hanham attempts to attack my analysis  
6 and conclusions concerning impacts on real estate values in Washington and Greene  
7 Counties resulting from the TrAIL project. His testimony presents an incorrect and  
8 distorted view of my analysis, asserting that I have no evidence to back up my  
9 conclusions and that my analysis was limited to visual impairment.

10

11 In my Rebuttal I described and summarized my specific property analysis and  
12 conclusions, as well as my review of various published articles on the subject. In  
13 view of ECC witness Hanham's effort to distort my testimony, I am attaching to this  
14 Rejoinder, as TrAILCo Exhibit No. FRC-1, my entire report that underlies and  
15 corroborates my opinions. Contrary to witness Hanham's assertions, my analysis and  
16 conclusions expressly reflected various matters that were considered by property  
17 owners with respect to property crossed by HVPLs. The same is true for the  
18 published literature I reviewed. The fact that I did not single out EMFs or any of the  
19 other specific factors taken into account by property owners does not mean that such  
20 factors were not considered. In fact, numerous factors were considered, and were  
21 included in my analysis. This fact is apparent from a review of my report.

1

2 Q. DOES THIS CONCLUDE YOUR REJOINDER TESTIMONY?

3 A. Yes. However, I reserve the right to file additional testimony as may be necessary or  
4 appropriate.