

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF MARYLAND**

In the Matter of the Application)	
Of CP Crane LLC for a Certificate)	
Of Public Convenience and Necessity)	Case No. 9482
Authorizing the Modification of the)	
Charles P. Crane Generating Station)	
In Baltimore County, Maryland)	

DIRECT TESTIMONY OF DR. PETER D. HALL

**ON BEHALF OF THE
MARYLAND DEPARTMENT OF NATURAL RESOURCES
POWER PLANT RESEARCH PROGRAM**

March 4, 2019

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

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

7 **Q. PLEASE DESCRIBE YOUR EXPERIENCE.**

8 A. I have conducted numerous socioeconomic impact studies for federal, state, and
9 private sector organizations for more than thirty-five years. I have conducted
10 socioeconomic assessments and provided expert testimony for the Power Plant
11 Research Program in multiple Certificate of Public Convenience and Necessity
12 (CPCN) cases before the Public Service Commission (PSC) over that time.

13 **Q. PLEASE EXPLAIN YOUR ROLE IN THE REVIEW OF THE CPCN**
14 **APPLICATION IN THIS CASE.**

15 A. I am responsible for evaluating socioeconomic impacts associated with the CP
16 Crane, LLC (CP Crane) CPCN application to modify the Charles P. Crane

1 Generating Station in Baltimore County, Maryland. It is referred to throughout
2 my testimony as the CP Crane Project (Project). My responsibilities included
3 undertaking a regional overview of current and anticipated socioeconomic
4 conditions in the Project area, and conducting comprehensive assessments of the
5 potential employment, income, population, housing, and fiscal impacts, in
6 addition to impacts upon land use, transportation, visual quality, and historical
7 and cultural resources associated with the construction and operation of the
8 Project. My evaluation is summarized in PPRP's *Project Assessment Report for the*
9 *CP Crane Generating Station* being filed in this case as PPRP Exhibit __ (SS-3).

10 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING THE ECONOMIC,**
11 **DEMOGRAPHIC AND FISCAL IMPACTS OF THE PROPOSED PROJECT?**

12 A. Modification of the facility will create temporary construction jobs. The
13 Applicant estimates that the Project will employ approximately 60 construction
14 workers over a 10-12 month period, with employment peaking at about 75.
15 Because the Project is within the Baltimore metropolitan area, most jobs will be
16 sourced locally. Additional benefits are expected from expenditures of goods
17 and services, although not all equipment will be sourced within Maryland.
18 Construction will generate a mild fiscal benefit for the State and Baltimore
19 County from taxes on direct and indirect income, personal consumption
20 expenditures, and sales of goods and services by Maryland firms. No State or
21 county expenditures will be required for infrastructure improvements, and the
22 Project will have no effect on public services or facilities. As such, the net
23 economic benefit to the State and Baltimore County will be positive.

24 Post-construction, the Project will benefit the Baltimore metropolitan area
25 through property taxes, employment, and purchases of goods and services for
26 maintenance. Plant staffing will be reduced significantly, but local contractors
27 will periodically be on site for maintenance. No population, housing, fiscal, or

traffic impacts are anticipated from Project operations.

Q. WHAT ARE YOUR CONCLUSIONS REGARDING TRANSPORTATION IMPACTS FROM THE PROPOSED PROJECT?

A. CP Crane has stated the number of construction workers onsite will be roughly the same as the retired coal- and diesel-fired units' operation and maintenance employment. PPRP has concluded existing roads are capable of handling the modest increment in traffic generated during construction.

Trucks will deliver materials and equipment to the Project site over the construction period. To the extent that any loads of materials or equipment for the Project are oversized or overweight, the Maryland State Highway Administration (SHA) requires hauling permits. Maryland's definition of an oversize or overweight vehicle is adopted by reference in Baltimore County regulations relating to maximum weights and sizes of vehicles. To address any roadway permit requirements, the Reviewing State Agencies have recommended a license condition requiring CP Crane to comply with all permit requirements for transport of oversize or overweight loads on State and county roads and obtain appropriate approvals as necessary (Initial Recommended License Condition No. H-1).

Post-construction traffic will be limited to an estimated four employee vehicles and periodic contractor visits. USLD fuel oil will be delivered via truck, although only when natural gas is not available in sufficient quantities. Natural gas will be delivered via an existing pipeline. No rail traffic is anticipated.

Q. PLEASE DESCRIBE THE DOMINANT LAND USES PRESENT WITHIN AND AROUND THE PROPOSED PROJECT.

A. The CP Crane site occupies approximately 157 acres within the lower portion of the Middle River Neck Peninsula adjacent to Seneca Creek. The peninsula is also

occupied by the Bowleys Quarters community, and is within the rural section Baltimore County's Urban Rural Demarcation Line (URDL). Much of the interior of the peninsula is farmland or forested. Newer development is concentrated in the upper peninsula. Most of the land is zoned Rural Residential (RC-5), Resource Conservation (RC-20), or Density Residential (DR-x). Water-based businesses are zoned Business Marine Boatyard (BMB) or Business Marine Marina (BMM). The land upon which the facility sits is split-zoned RC-5. The CP Crane site is in the Chesapeake Bay Critical Area and is classified as an Intensely Developed Area (IDA) within the guidelines of the Chesapeake Bay Critical Area Act.

Q. WHAT ARE YOUR CONCLUSIONS REGARDING LAND USE IMPACTS DUE TO THE PROPOSED PROJECT?

A. Construction activities will be confined to previously developed areas of the site. Post-construction, use of the land will not be significantly different from the facility as it existed previously. In its response to PPRP Data Request No. 2-2, CP Crane stated it has consulted with Baltimore County to confirm that the improvements planned and the intended use of the property is in conformance with the county's special exception conditions.

Q. PLEASE DESCRIBE THE PROPOSED PROJECT'S VISUAL IMPACTS.

A. During construction, cranes may be visible from some perspectives, and local residents may notice an increase in the number of trucks entering or exiting the site. However, truck traffic is part of normal plant operations, and only a minor increase in the volume of truck traffic is anticipated.

Post-construction views of the CP Crane Generating Station will not change significantly. The combustion turbine (CT) power block will be west of the existing power plant, and much of the onsite infrastructure associated with the

1 coal-fired units will remain, including two 400-foot boiler stacks. The new CTs
2 will have a low visual profile, as will other Project components. The tallest
3 structures will be the CT stacks, which will be 160 feet above ground level.

4 PPRP has concluded the Project will have a minimal adverse effect on views
5 from surrounding areas.

6 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING IMPACTS ON**
7 **HISTORICAL AND CULTURAL RESOURCES FROM THE PROPOSED**
8 **PROJECT?**

9 A. Two properties listed in the Maryland Inventory of Historic Places (MIHP) are
10 within one mile of the facility, but are visually buffered by intervening forested
11 lands. Other MIHP and National Register listed properties are outside the
12 Project's area of potential effect. There are no archeological or historic resources
13 within the boundaries of the CP Crane Generating Station. PPRP has concluded
14 construction will have no adverse effect on archeological or historic sites.

15 In the event that construction reveals relics of unforeseen archeological sites, the
16 Reviewing State Agencies recommend a license condition requiring the
17 Applicant, in consultation with and as approved by the Maryland Historical
18 Trust, to develop and implement a plan for avoidance and protection, data
19 recovery, or destruction without recovery of such relics or sites (Initial
20 Recommended License Condition No. I-1).

21 The CP Crane Generating Station is located in Baltimore County's Coastal Rural
22 Legacy Area, and two Rural Legacy easements are adjacent to the property
23 parcels. Neither parcel is proximate to Project components, and both parcels are
24 separated from the nearest structures by woodlands. With a similar or slightly
25 reduced visual footprint, PPRP has concluded the Project will not affect nearby
26 cultural, scenic or other programmatic resources.

1 Q. DOES THAT CONCLUDE YOUR TESTIMONY AT THIS TIME?

2 A. Yes, it does.

**APPENDIX A:
STATEMENT OF QUALIFICATIONS
for Peter D. Hall**

Dr. Peter D. Hall is a consulting economist and president of Metametrics, Inc., a consulting firm based in Sperryville, Virginia. He has over thirty years of experience in regional economic analysis and socioeconomic impact assessment. Over that period, he has directed numerous consulting engagements assessing the economic, social and other impacts from 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 serves as an expert socioeconomic consultant and has performed a number of socioeconomic assessments for CPCN applications over the years. 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. 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 Montgomery County, the Clipper, U.S. Windforce and Synergics wind energy Projects in western Maryland and Projects resulting from Maryland's Healthy Air Act (HAA). Other assessments have included the proposed Catoctin power plant in Frederick County, the CPV St. Charles power plant in Charles County, the Wildcat Point combined cycle facility in Cecil County, the Keys and Mattawoman power plants in Prince George's County, and many transmission line cases throughout the State. Dr. Hall has conducted more than two dozen socioeconomic assessments of renewable energy Projects proposed for 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.

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.