

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of WOLVERINE)
PIPE LINE COMPANY for authority under 1929 PA 16)
to construct, operate and maintain a pipe line for the)
transportation of liquid petroleum products.)

Case No. U-13225

PREFILED REBUTTAL TESTIMONY
OF
C.S. WOODBURN
ON BEHALF
OF
WOLVERINE PIPE LINE COMPANY

DYLEMA CASSETT • A PROFESSIONAL LIMITED LIABILITY COMPANY • 800 MICHIGAN NATIONAL TOWER • LANSING • MICHIGAN 48911-1742

1 Q₁ PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

2 A₁ My name is C. S. Woodburn. I am employed by ExxonMobil Pipeline Company (“Exxon
3 Mobil”) as a Joint Interest Coordinator. I am also the Assistant Secretary of Wolverine
4 Pipe Line Company (“Wolverine”) and the Project Executive in charge of the project
5 proposed by Wolverine in the pending application. My business address is Room 625H,
6 800 Bell Street, Houston, Texas 77002.

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8 Q₂ ARE YOU THE SAME C.S. WOODBURN WHO SUBMITTED PREFILED
9 DIRECT TESTIMONY IN THIS CASE ON DECEMBER 5, 2001?

10 A₂ Yes.

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12 Q₃ WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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A₃ The purpose of my testimony is to respond to statements made by Patricia Cook in her prefiled direct testimony.

Q₄ DO YOU AGREE WITH MS. COOK'S OPINION AT PAGE 4, LINE 19 THROUGH PAGE 5, LINE 1 THAT THE PIPELINE WILL NOT PRODUCE JOBS OR BENEFITS TO THE LOCAL ECONOMY?

A₄ I do not.

Q₅ PLEASE EXPLAIN.

A₅ Wolverine Pipe Line Company ("Wolverine") estimates that it will spend approximately \$10,000,000 on construction activity for the proposed pipeline. It is customary practice that local labor is used by the contractor chose to perform the work.

Also, Mid-Michigan and Northern Michigan have been unable to meet the demand for petroleum product through pipeline transportation since the Alma Total Ultra Diamond Shamrock refinery closed in 1999. The proposed pipeline will supply distribution centers that serve the needs of a 29 county area in Mid-Michigan and will have sufficient capacity to supply the public's liquid petroleum product requirements. The pipeline will also provide access to competitively priced petroleum products from the Chicago and Gulf Coast area refineries. Finally, the pipeline will help ensure that Mid-Michigan and Northern Michigan consumers are protected from price spikes due to transportation upsets from the Chicago and Gulf Coast area refineries.

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Q₆ DOES THIS CONCLUDE YOUR TESTIMONY?

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A₆ Yes, it does.