

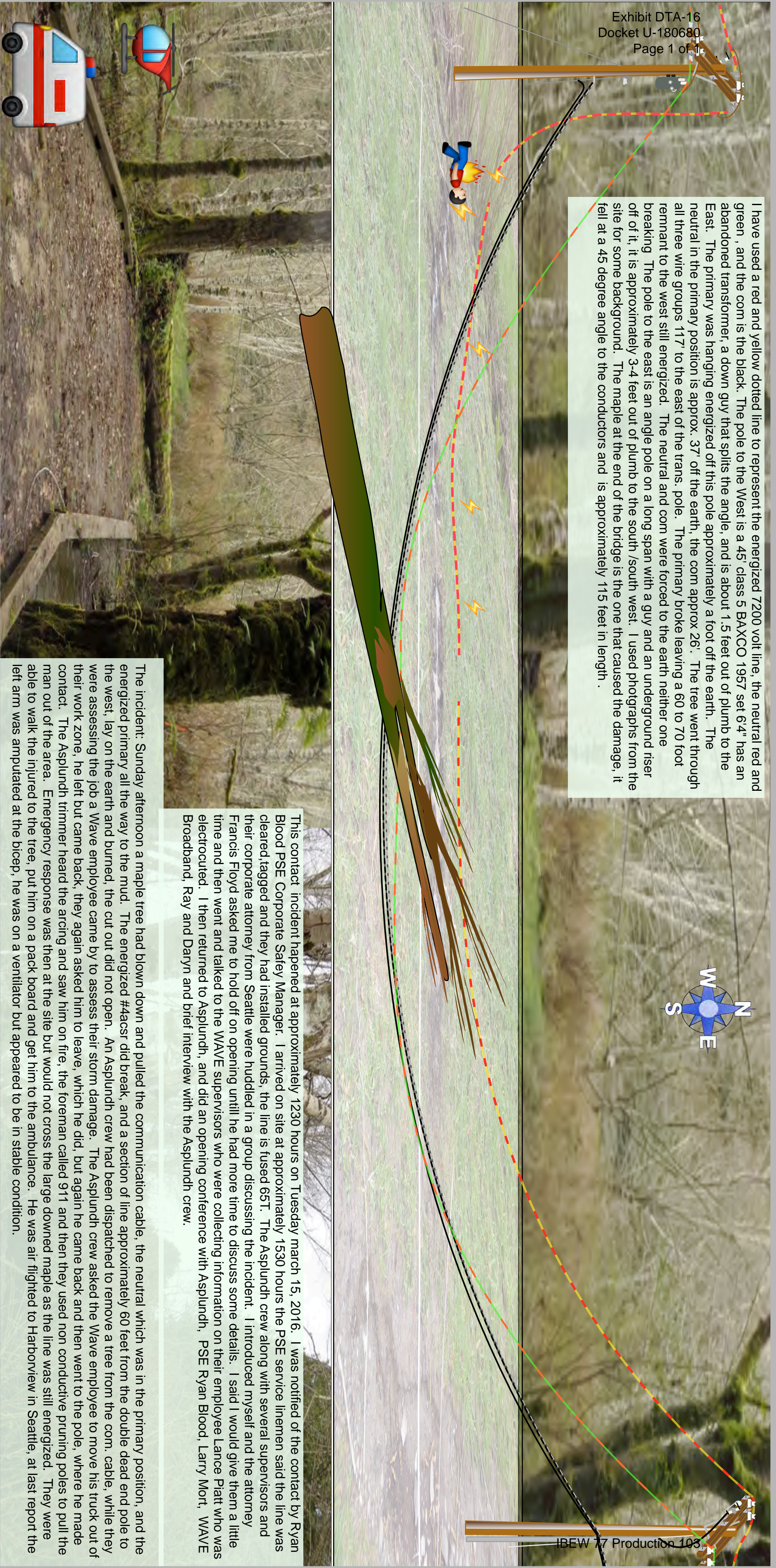
**Exhibit DTA-16**  
*Picture Diagram of Anderson Landing Incident*

**TESTIMONY OF**

**D. Timothy Arnold**

**In Opposition to the Multiparty Settlement Stipulation on Behalf of IBEW 77**

I have used a red and yellow dotted line to represent the energized 7200 volt line, the neutral red and green, and the com is the black. The pole to the West is a 45' class 5 BAXCO 1957 set 6'4" has an abandoned transformer, a down guy that splits the angle, and is about 1.5 feet out of plumb to the East. The primary was hanging energized off this pole approximately a foot off the earth. The neutral in the primary position is approx. 37' off the earth, the com approx 26'. The tree went through all three wire groups 117' to the east of the trans. pole. The primary broke leaving a 60 to 70 foot remnant to the west still energized. The neutral and com were forced to the earth neither one breaking. The pole to the east is an angle pole on a long span with a guy and an underground riser off of it, it is approximately 3-4 feet out of plumb to the south/south west. I used photographs from the site for some background. The maple at the end of the bridge is the one that caused the damage, it fell at a 45 degree angle to the conductors and is approximately 115 feet in length.



This contact incident happened at approximately 1230 hours on Tuesday March 15, 2016. I was notified of the contact by Ryan Blood PSE Corporate Safety Manager. I arrived on site at approximately 1530 hours the PSE service linemen said the line was cleared, tagged and they had installed grounds, the line is fused 65T. The Asplundh crew along with several supervisors and their corporate attorney from Seattle were huddled in a group discussing the incident. I introduced myself and the attorney Francis Floyd asked me to hold off on opening until he had more time to discuss some details. I said I would give them a little time and then went and talked to the WAVE supervisors who were collecting information on their employee Lance Platt who was electrocuted. I then returned to Asplundh, and did an opening conference with Asplundh, PSE Ryan Blood, Larry Mort, WAVE Broadband, Ray and Daryn and brief interview with the Asplundh crew.

The incident: Sunday afternoon a maple tree had blown down and pulled the communication cable, the neutral which was in the primary position, and the energized primary all the way to the mud. The energized #4acsr did break, and a section of line approximately 60 feet from the double dead end pole to the west, lay on the earth and burned, the cut out did not open. An Asplundh crew had been dispatched to remove a tree from the com. cable, while they were assessing the job a Wave employee came by to assess their storm damage. The Asplundh crew asked the Wave employee to move his truck out of their work zone, he left but came back, they again asked him to leave, which he did, but again he came back and then went to the pole, where he made contact. The Asplundh trimmer heard the arcing and saw him on fire, the foreman called 911 and then they used non conductive pruning poles to pull the man out of the area. Emergency response was then at the site but would not cross the large downed maple as the line was still energized. They were able to walk the injured to the tree, put him on a pack board and get him to the ambulance. He was air flighted to Harborview in Seattle, at last report the left arm was amputated at the bicep, he was on a ventilator but appeared to be in stable condition.