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9 SHANGHAI ELECTRIC POWER JAPAN CO., LTD. and  
10 TERRA ENERGY, INC.

**BEFORE THE PUBLIC AUDITOR  
PROCUREMENT APPEALS  
TERRITORY OF GUAM**

11 IN THE APPEAL OF

12 SHANGHAI ELECTRIC POWER  
13 JAPAN CO., LTD. and TERRA  
14 ENERGY, INC.,

Appellants.

Appeal No. OPA-PA-17-008

**APPELLANTS' WITNESS LIST**

15 The Appellants Shanghai Electric Power Japan Co., Ltd. and Terra Energy, Inc.  
16 (collectively, "SEPJ") submit the following list of witnesses for the Hearing:

- 17 1. Dale Gauthier of AECOMM
- 18 2. Diax Xu, Manager of Shanghai Electric Power Japan Co., Ltd.
- 19 3. Jun Xia of Shanghai Electric Power Japan Co., Ltd.
- 20 4. Eddie Woo of Terra Energy, Inc.
- 21 5. Any and all witnesses endorsed or called by the Guam Power Authority;  
22 Hanwha Energy Corporation and Pacific Petroleum Corporation  
23 ("Hanwha"); and Korea Electric Power Corporation and LG CNS  
24 Consortium ("KEPCO").
- 25 6. Any rebuttal witnesses reasonable and appropriate to respond to  
26 unexpected testimony.

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DATED this 16 day of October, 2017.

Respectfully submitted,

**BERMAN O'CONNOR & MANN**  
Attorneys for Appellants  
*SHANGHAI ELECTRIC POWER JAPAN CO.,  
LTD. and TERRA ENERGY, INC.*

By:   
\_\_\_\_\_ DANIEL J. BERMAN